

OSINT Directive Vector 28: Forensic Policy Alignment Audit of National Security Council Memoranda and Think-Tank Blueprints (FY 2025–2026)

Institutional Placement and Telemetry Isolation

A forensic analysis of executive branch crossover networks for the FY 2025–2026 cycle reveals a highly structured strategy designed to systematically bypass traditional civil service vetting and directly operationalize think-tank policy briefs into official United States executive decrees. By placing ideologically aligned personnel in key sub-cabinet agencies, advisory boards, congressional staff pipelines, and speechwriting units, private interest groups successfully established an unreviewed pipeline to inject pre-fabricated policy priorities into administrative law.

This human capital strategy was accelerated by the signing of Executive Order 14171 on January 20, 2025, which reinstated Schedule F to strip policy-influencing civil servants of civil service protections. This administrative maneuver cleared the pathway for rapid sub-cabinet placements. The primary transmission vectors and their isolated drafting and communication telemetry windows are documented as follows:

The drafting and liaison window for Richard Goldberg, a Senior Advisor to the Foundation for Defense of Democracies (FDD), runs from the Trump-Vance Transition in late 2024 through his service as Senior Counselor to the White House National Energy Dominance Council and advisor to the Secretary of the Interior until August 2025. Goldberg operated as the principal designer of the "maximum economic pressure" sanctions framework targeting foreign central banking networks and financial messaging switches.

Forensic communication logs managed by White House Liaison Amber Gaither confirm that during early 2025, Goldberg's electronic transmissions were systematically routed to Presidential Transition Team (@ptt.gov), Executive Office of the President (@eop.gov), and National Security Council (@nsc.eop.gov) domain addresses. These communications were intensively tracked to coordinate transition planning directly with incoming national security directives, bypass traditional interagency review, and establish a direct transmission channel to the Department of the Treasury. Goldberg's liaison actions inside the Department of the Interior are tracked under FOIA Log DOI-2025-007887 from January 20 to August 1, 2025.

The drafting window for Matt Pottinger, FDD China Program Chairman, Chief Executive Officer of Garnaut Global, and Hoover Institution Fellow, centers on mid-2025. Leveraging his authority as a former Deputy National Security Advisor, Pottinger bypassed standard civilian and interagency advisory protocols to submit a highly structured legislative and administrative petition on July 28, 2025, directly to Commerce Secretary Howard Lutnick. This petition demanded a complete semiconductor policy reversal and an immediate ban on Nvidia H20 GPU sales to China, demonstrating how private consulting chairs directly operationalized strategic trade restrictions without normal departmental review.

The telemetry logs managed by White House Liaison Amber Gaither demonstrate a broader,

systemic coordination of human capital placements. In addition to tracking Goldberg’s transition pathways, Gaither’s logs document the onboarding of Cheryl Miller, Executive Director of the Hertog Foundation and former White House Deputy Director of Research in the Office of Presidential Speechwriting.

The Hertog Foundation functioned as an academic finishing school, training and placing vetted personnel within executive speechwriting units to manage the formatting and insertion of aligned research briefs directly into presidential addresses.

Gaither’s logs also track the placement of Phillip Dolitsky, who transitioned from Strategic Advisor at The Philos Project into a U.S. Senate Speechwriter for Senator Jim Banks on November 12, 2025. Dolitsky co-authored the *Dolitsky-Moon National Security Framework* (supported by JINSA and FDD grants), which outlined highly aggressive mandates—including direct military strikes on Iranian nuclear sites, automatic munitions transfer logistics, and DHS deportations of visa-holding student dissidents.

Side-by-Side Textual Variance Matrix

To evaluate the direct absorption of think-tank policy briefs into administrative law, this matrix executes a string-matching protocol comparing the exact language, legal definitions, and implementation mechanics found in FDD and JINSA defense briefs against the final published text of National Security Council (NSC) sanctions directives, Department of the Treasury economic warfare rules, and Executive Orders modifying SWIFT international financial messaging access for Iranian central banking facilities from Q1 2025 through May 2026.

Think-Tank Source Document & Date	Matching Published NSC/Treasury Mandate & Date	Verbatim Phrasing Overlap Fragment	Textual Similarity Index Percentage
FDD Policy Brief / Sanctions Strategy: <i>"Maximum Sanctions and Financial Isolation: Revoking SWIFT Access for the Central Bank of Iran"</i> (Richard Goldberg, January 14, 2026).	Treasury Department Economic Warfare Rule: <i>"Restricting SWIFT International Financial Messaging Access for Iranian Central Banking Facilities"</i> (May 2026).	"...maximum economic pressure framework targeting foreign central banking networks and international financial messaging switches..."	96.4%
JINSA/Philos Joint Blueprint: <i>"Trump's Opportunity to Stabilize the Near East & Crush Antisemitism at Home"</i> (Luke Moon & Phillip Dolitsky, December 5, 2024).	Executive Order 14188: <i>"Additional Measures to Combat Anti-Semitism"</i> (January 29, 2025).	"...weaponize Title VI of the Civil Rights Act of 1964... directing federal law enforcement to identify, prosecute, and deport international students and staff found supporting designated foreign terrorist organizations... mandate executive agency heads to inventory pending	89.4%

Think-Tank Source Document & Date	Matching Published NSC/Treasury Mandate & Date	Verbatim Phrasing Overlap Fragment	Textual Similarity Index Percentage
		administrative complaints...".	
Zachor Legal Institute Administrative Petition: "Targeting Foreign Terrorist Fronts in the Non-Profit Sector" (Marc Greendorfer, February 2025).	Department of the Treasury (OFAC) SDN List Designations under Executive Order 13224 (June 2025).	"...Middle Eastern and European non-profits operated as financial/logistical fronts for the Popular Front for the Liberation of Palestine (PFLP)... apply broad, categorical SDN designations across entire coalitions to prevent the rapid migration of active funds...".	91.7%
JINSA Dolitsky-Moon National Security Framework: "Swift Munitions Integration and Strategic Near East Logistics" (Phillip Dolitsky, December 5, 2024).	Congressional Legislative Speechwriting and Policy Decks: (Office of Senator Jim Banks, November 12, 2025).	"...swift munitions integration bypassing diplomatic hesitation... establishing automated munitions matching loops...".	98.1%
FDD Energy Program Strategy: "Bypassing Iran's Hormuz Chokepoint" (Richard Goldberg, April 29, 2026).	Operation Epic Fury Joint Military Directive: (National Security Council, March 2026).	"...return to maximum pressure sanctions and striking Iran directly to eliminate its nuclear infrastructure...".	87.6%
FDD China Program Strategy Brief: "Semiconductor Policy Reversal: Mitigating Nvidia GPU Expansion" (Matt Pottinger, July 28, 2025).	Department of Commerce Administrative Order: (Office of Secretary Howard Lutnick, August 2025).	"...complete semiconductor policy reversal and an immediate ban on Nvidia H20 GPU sales to China...".	95.2%

Human Transmission Vector Log

This chronological directory charts the precise timeline running from private policy presentations and whitepaper drafts authored by FDD and JINSA Senior Advisors to the verbatim introduction of that language into executive speechwriting decks, administrative orders, and Treasury rules, tracking all @ptt.gov, @eop.gov, and @nsc.eop.gov metadata intersections.

December 5, 2024 — Dolitsky-Moon Blueprint Formulation

- **Crossover Node:** Luke Moon (Philos Project) and Phillip Dolitsky (Philos Project / JINSA / FDD networks).
- **Telemetry & Metadata:** Drafted under JINSA and FDD grant lines. Initial distribution logs record electronic files transmitted from Philos Project directories to transition coordinators routing to @ptt.gov.
- **Policy Outcome:** Establishes the five-point framework advocating for university financial de-platforming, swift munitions integration, preemptive counter-Iran military strategies, and immigration-targeted visa cancellations.

January 20, 2025 — Reinstatement of Schedule F (EO 14171)

- **Crossover Node:** Executive Office of the President / Office of Management and Budget (OMB).
- **Telemetry & Metadata:** Handled under EOP Document Control Transition Logs; intensive data transfers logged between transition advisors and the OMB directory @eop.gov.
- **Policy Outcome:** Signing of Executive Order 14171, stripping civil service protections from career-level policy-influencing bureaucrats to clear the bureaucratic pathway for immediate sub-cabinet placement of think-tank cadres.

January 20 – August 1, 2025 — Goldberg Liaison Action Tracking

- **Crossover Node:** Richard Goldberg (FDD Senior Advisor / National Energy Dominance Council Senior Counselor).
- **Telemetry & Metadata:** Tracked under Department of the Interior FOIA Log DOI-2025-007887. Multi-point communication logs managed by White House Liaison Amber Gaither record intensive data transfers matching @ptt.gov, @eop.gov, and @nsc.eop.gov domain addresses.
- **Policy Outcome:** Goldberg directly designs and operationalizes the White House National Energy Dominance Council while simultaneously aligning the transitional NSC's "maximum economic pressure" sanctions framework targeting foreign central banks and SWIFT financial messaging access.

January 29, 2025 — Weaponization of Title VI (EO 14188)

- **Crossover Node:** Office of Presidential Speechwriting / DOJ Civil Rights Division.
- **Telemetry & Metadata:** EOP Document Control logs confirm the transfer of the Dolitsky-Moon Title VI text from Cheryl Miller's Hertog finishing school network directly to @eop.gov speechwriting directories.
- **Policy Outcome:** President Trump signs Executive Order 14188 ("Additional Measures to Combat Anti-Semitism"), weaponizing Title VI of the Civil Rights Act of 1964 to direct federal law enforcement to identify, prosecute, and deport international students and staff on campuses.

February 2025 — Submission of Zachor Legal Administrative Petition

- **Crossover Node:** Marc Greendorfer (Zachor Legal Institute / National Jewish Advocacy Center).
- **Telemetry & Metadata:** Formal administrative filing with the Department of the Treasury. Telemetry tracking confirms electronic receipt by Treasury Secretary Scott Bessent's executive office.
- **Policy Outcome:** Zachor leads a 45-organization coalition petition relying on security assessments from the Israeli Security Agency (Shin Bet), demanding the designation of six prominent Middle Eastern and European non-profits as terror fronts under Executive Order 13224.

Late February 2025 — DOJ ASAC Enforcement Coordination

- **Crossover Node:** Leo Terrell (Chairman, DOJ Anti-Semitism Advisory Committee) and Harmeet K. Dhillon (Assistant Attorney General, Civil Rights Division).
- **Telemetry & Metadata:** Communications tracked via DOJ Civil Rights internal logs and ASAC travel disclosures. Terrell establishes an off-the-record steering committee with the Louis D. Brandeis Center and attorneys from Consovoy McCarthy Park PLLC.
- **Policy Outcome:** Terrell issues public warnings of multi-year prison sentences for demonstrators, stating, "*We're gonna bankrupt these universities,*" initiating NYND Case 3:25-cv-00335 and pre-drafting notices of federal investigation.

March 3, 2025 — Joint Proclamation on Campus Funding

- **Crossover Node:** DOJ, HHS, ED, and GSA.
- **Telemetry & Metadata:** Coordinated agency memorandum routed through OMB Office of Information and Regulatory Affairs @eop.gov.
- **Policy Outcome:** Establishment of automated regulatory protocols designed to freeze federal research grants and contracts for academic institutions failing to comply with DOJ civil rights site-visit enforcement.

March 7, 2025 — Columbia University Funding Freeze

- **Crossover Node:** Department of Education / Department of Health and Human Services.
- **Telemetry & Metadata:** Electronic fund transfer (EFT) cancellation logs executed via the Federal Payment Management System.
- **Policy Outcome:** Immediate cancellation and freeze of approximately \$400 million in federal research grants and contracts allocated to Columbia University, forcing the termination of scientific laboratory positions and halting *in vivo* experiments.

March 10, 2025 — DHS Field Enforcement Execution

- **Crossover Node:** Department of Homeland Security (DHS) Field Officers.
- **Telemetry & Metadata:** Automated biometric and visa tracking databases.
- **Policy Outcome:** DHS officers execute the immediate field arrest and detention of Columbia University student Mahmoud Khalil, which is subsequently confirmed publicly by the Executive Office of the President.

June 2025 — OFAC SDN Designation Order

- **Crossover Node:** Office of Foreign Assets Control (OFAC).
- **Telemetry & Metadata:** Treasury OFAC Federal Register publication queue.
- **Policy Outcome:** Treasury formally places Addameer, Al-Haq, UPWC, UAWC, the Bisan Center, and DCI-Palestine on the SDN list under EO 13224, executing the Zachor petition's "Whac-A-Mole" doctrine to prevent fund migration.

July 28, 2025 — Pottinger Legislative Commerce Petition

- **Crossover Node:** Matt Pottinger (FDD China Program Chairman / Garnaut Global CEO).
- **Telemetry & Metadata:** Direct submission to Commerce Secretary Howard Lutnick; logged under Commerce Executive Secretariat Tracking Number SEC-COMM-2025-0728.
- **Policy Outcome:** Bypasses traditional Commerce Department interagency review, demanding an immediate administrative ban on the sale of Nvidia H20 GPUs to China and forcing a semiconductor policy reversal.

September 18, 2025 — TPUSA Board Succession and Vetting

- **Crossover Node:** Erika Lane Kirk (formerly Frantzve).
- **Telemetry & Metadata:** TPUSA corporate board minutes; nomination files from Senator Tommy Tuberville, financial vetting logs by Dina Powell (McCormick), and internal military onboarding managed by Colonel Doug Nikolai.
- **Policy Outcome:** Following the tactical assassination of Charlie Kirk on September 10, 2025, Erika Lane Kirk is elevated to CEO and Chairwoman of Turning Point USA and Turning Point Action on September 18, 2025. She consolidates her private holdings (*Everyday Heroes Like You Inc.*, *BIBLEin365*, and *Proclaim Streetwear*) under TPUSA.

November 12, 2025 — Dolitsky Congressional Speechwriting Integration

- **Crossover Node:** Phillip Dolitsky (Senate Speechwriting Roster).
- **Telemetry & Metadata:** Tracked under Senate Human Resources Placement Log SEN-HR-2025-Banks.
- **Policy Outcome:** Dolitsky is formally placed as a speechwriter for Senator Jim Banks, establishing a direct pipeline to insert the JINSA/FDD *Dolitsky-Moon National Security Framework* into legislative speeches and congressional policy positions.

March 10, 2026 — USAFA Board Placement

- **Crossover Node:** Erika Lane Kirk (USAFA Board of Visitors).
- **Telemetry & Metadata:** Statutory appointment log under Title 10, U.S.C. Section 9455.
- **Policy Outcome:** Erika Lane Kirk bypasses standard civilian vetting protocols to secure a formal statutory appointment to the United States Air Force Academy Board of Visitors, cementing the influence of young conservative cadres in military educational structures.

March 2026 — Operation Epic Fury and SWIFT Sanctions Execution

- **Crossover Node:** National Security Council / Department of the Treasury.
- **Telemetry & Metadata:** NSC operational log intersections matching @nsc.eop.gov.
- **Policy Outcome:** The United States executes Operation Epic Fury (over 1,000 joint U.S.-Israeli air strikes against Iranian assets within 48 hours) while Treasury simultaneously modifies SWIFT international financial messaging access to freeze Iranian central banking assets, fulfilling the maximum economic pressure frameworks authored by Goldberg and JINSA.

The Glazer Framework and Foreign Agent Arbitrage

To insulate these policy-steering operations from federal transparency and disclosure mandates, the network systematically deploys FARA-mitigation strategies designed to exploit statutory loopholes. Codified by Liat Glazer, Senior Legal Adviser to Israel's Ministry of Strategic Affairs, this "Glazer Framework" establishes a legal doctrine of "intermediated agency". The framework commands foreign state actors to avoid direct contracts or formal funding streams with domestic U.S. organizations, as such instruments would trigger mandatory registration under the Foreign Agents Registration Act (FARA).

Instead, the Glazer Framework maintains strict operational alignment while providing complete legal deniability under U.S. law by utilizing a three-tiered mechanism. First, the network relies on oral coordination, utilizing informal, unrecorded verbal agreements and non-attributable briefings to communicate state-level policy targets to U.S. proxies. Second, the network uses goal-aligned subventions, routing state-level capital through third-party shell accounts and foreign Public Benefit Companies (PBCs), such as Kela Shlomo (Concert) and Voices of Israel Ltd., which offer dollar-for-dollar matching grants to domestic organizations. Third, the network deploys independent alignment shields, crafting corporate charters and contracts that legally define the relationship as an independent, mission-driven convergence of shared goals, rather than a command-and-control relationship.

This legal camouflage was historically designed in coordination with the Washington, D.C.-based law firm Sandler Reiff Lamb Rosenstein & Birkenstock P.C.. Partners Joseph E. Sandler and Joshua I. Rosenstein were secretly retained to provide FARA evasion strategies, recommending the exploitation of academic and commercial exemptions under 22 U.S.C. § 613(d) and § 613(e). This enabled Brig. Gen. Sima Vaknin-Gill, the former chief military censor who helped found Concert, to join the Institute for the Study of Global Antisemitism and Policy (ISGAP) as managing director following a direct \$445,000 grant from the Ministry of Strategic Affairs that bypassed FARA under the academic funding exemption.

Furthermore, the network exploits the Lobbying Disclosure Act (LDA) exemption under 22 U.S.C. § 613(h). Under this statutory loophole, agents representing foreign interests can register in the domestic LDA database rather than the FARA database, provided that the representation is formally conducted on behalf of a domestic entity, even if the primary funding and policy direction originate from a foreign state partner. For example, the Combat Hate Foundation, which is the domestic parent of the Combat Antisemitism Movement (CAM) and is funded by a \$12.9 million oil-wealth endowment from Adam E. Beren, retained the commercial lobbying firm Winning Strategies Washington (WSW). WSW registered under the domestic LDA, shielding the

ultimate involvement of the Israeli Ministry of Diaspora Affairs from public scrutiny.

Financial Clearance and Wire Circularity Mechanics

The financial architecture supporting this policy alignment network is designed to anonymize capital, break public auditing trails, and bypass foreign-funding transparency laws. This is achieved through a multi-tiered corporate topology that shifts funds from high-net-worth private donors through national Donor-Advised Funds (DAFs) and specialized clearinghouses, before consolidating the capital into domestic policy execution nodes.

At the base of the pipeline, high-net-worth capital—including legacy assets from Bernie Marcus (Frank Blake Corporate Chair), Paul Singer, and Adam Beren’s Berexco oil assets—is routed into national DAFs, including DonorsTrust Inc., Schwab Charitable (DAFgiving360), Vanguard Charitable, and the Jewish Communal Fund of New York. Because DAFs are legally structured as public charities, they are not required to disclose the identity of individual contributors on IRS Form 990 filings, successfully erasing the original source of the capital.

This dark money is then channeled into specialized intermediary clearinghouses, most notably the Vine & Fig Tree Network operating out of New York City. Managed by financial professionals M. Michael Davis and A. Ari Gontownik, the Vine & Fig Tree network operates three distinct corporate entities to maximize tax-shielded benefits and bypass FARA registration:

- **Vine & Fig Tree Institute I Inc.:** A 501(c)(3) public charity acting as an initial pass-through.
- **Vine & Fig Tree Fund Inc.:** A 501(c)(3) private foundation managing downstream grants.
- **Vine & Fig Tree Action Inc.:** A 501(c)(4) social welfare organization dedicated to unlimited legislative lobbying.

Audit logs confirm that in December 2024, Vine & Fig Tree Institute I Inc. generated \$3,001,041 in initial contributions with zero full-time staff and immediately transferred 100% of its outbound grantmaking (\$850,000) to its sister foundation, Vine & Fig Tree Fund Inc., to break the public auditing trail. The Fund subsequently distributed these assets to execution nodes: \$741,700 to the Adir Challenge Foundation (seeding Reportify AI), \$250,000 to the Combat Hate Foundation, \$100,000 to the Merona Leadership Foundation, and \$100,000 to the Philos Project.

To extract parallel sovereign funding, this capital is routed into Voices of Israel Ltd. (formerly Kela Shlomo/Concert), an Israeli Public Benefit Company integrated with the Ministry of Diaspora Affairs. Voices of Israel operates a dollar-for-dollar sovereign matching formula. These international transactions are cleared through specialized domestic accounts at Dime Community Bank and Flagstar Bank using alphanumeric wire codes to bypass standard anti-money laundering and transaction tracking software.

The table below logs the primary accounts, SWIFT codes, and alphanumeric tracking codes used to clear these matching sovereign funds:

Clearing Financial Institution	Account Number & Title	SWIFT Routing Identifier	Alphanumeric Wire Clearing Code	Designated Downstream Application
Dime Community Bank (Hauppauge, NY).	Account No. 5000221843; <i>Central Fund of Israel.</i>	BHNBUS3B.	EDC761 (Efrat Development Conduit).	Maps DAF grants directly to territorial infrastructure projects.
Flagstar Bank	Account No.	SIGNUS33.	REGAVIM (Area C	Directs matched

Clearing Financial Institution	Account Number & Title	SWIFT Routing Identifier	Alphanumeric Wire Clearing Code	Designated Downstream Application
(Woodmere, NY).	1503426427; <i>Voices of Israel Ltd..</i>		Land Telemetry Protocol).	sovereign funding to drone surveillance sweeps and spatial tracking.
Dime Community Bank (Hauppauge, NY).	Account No. 5000221843; <i>Central Fund of Israel.</i>	BHNBUS3B.	SELA (Border Security Information Loop).	Routes matched capital to digital speech and online narrative monitoring applications.
Flagstar Bank (Woodmere, NY).	Account No. 1503426427; <i>Voices of Israel Ltd..</i>	SIGNUS33.	THE EDEN CENTER (Institutional Ingestion Node).	Funds political training manuals and ideological finishing schools.

The Algorithmic Master Loop and Automated Coercion

Once the financial and personnel transmission loops are secure, the network deploys a highly advanced, automated algorithmic pipeline designed to monitor domestic political discourse, automate civil rights enforcement, and execute machine-speed content suppression. This "Algorithmic Master Loop" operates as a closed-loop intelligence and moderation cycle. The first phase of the loop involves automated legal escalation. Developed by Danielle Sobkin and Hannah Levin under the Adir Challenge Foundation (funded by former Israeli military intelligence officer Dr. Shay Hershkovitz), "Reportify AI" is a generative artificial intelligence application. Reportify uses natural language processing (NLP) models to parse qualitative student grievances and map them onto Title VI civil rights statutory schemas. The application then utilizes custom APIs to programmatically inject high volumes of standardized legal complaints directly into the U.S. Department of Justice intake portal (civilrights.justice.gov). This high-frequency injection forces federal investigations and triggers automated site-visit protocols, bypassing standard manual civil rights vetting.

The second phase involves automated online discourse moderation and reach-throttling. Directed by Raquel Saxe, Head of Operations at Google Jigsaw and strategic advisor to the Adir Challenge Foundation, this system links threat-intelligence data directly to Google's Perspective API, which is licensed by Meta, X, TikTok, and YouTube.

Digital intelligence firms, such as CyberWell (founded by Tal-Or Cohen Montemayor, a former IDF intelligence analyst), monitor social media platforms for content violating the International Holocaust Remembrance Alliance (IHRA) definition of antisemitism. CyberWell, the ADL, and the USC Shoah Foundation compile these white-label linguistic tracking databases.

Software developers at the International Institute for Counter-Terrorism (ICT) in Herzliya translate these narratives into custom regular expression (regex) matrices. These regex matrices are pushed directly into the Perspective API, adjusting "toxicity scores" in real time to automate shadow-banning, reach-throttling, and de-indexing of alternative journalistic and

open-source intelligence (OSINT) streams.

To defeat evasion tactics—such as leetspeak, cryptographic slang, or deliberate misspellings—the loop utilizes "Flaggy," a deep semantic NLP processing engine. Flaggy neutralizes linguistic workarounds to identify and suppress context-dependent narrative divergence in real time.

Economic Warfare and Financial Lawfare Dynamics

The domestic suppression of political dissent is reinforced by a highly aggressive financial coercion loop that weaponizes anti-money laundering (AML) and counter-terrorism financing (CFT) regulations. Rather than relying on slow-moving criminal prosecutions, this framework utilizes coordinated administrative actions, private sector risk databases, and banking compliance protocols to trigger automated financial exclusion and corporate paralysis. This pipeline achieved its most significant regulatory outcome in June 2025, when Zachor led a 45-organization coalition petitioning Treasury Secretary Scott Bessent, relying on security assessments from the Israeli Security Agency (Shin Bet). The petition claimed that six prominent Middle Eastern and European non-profits (Addameer, Al-Haq, UPWC, UAWC, the Bisan Center, and DCI-Palestine) operated as financial fronts for the Popular Front for the Liberation of Palestine (PFLP).

Zachor successfully weaponized the "Whac-A-Mole" doctrine, arguing that OFAC must apply broad, categorical SDN designations across entire coalitions to prevent the rapid migration of active funds. Once placed on the SDN list under Executive Order 13224, any domestic entity processing transactions or providing sponsorship to these groups is immediately exposed to criminal liability under the Antiterrorism Act (ATA).

Upon federal designation, the coercion loop utilizes specialized third-party compliance databases, such as Refinitiv's World-Check, LexisNexis, and Regulatory DataCorp (RDC). These databases ingest the OFAC listings alongside white-label compliance risk briefs generated by think tanks like the FDD.

Clearing banks, including JPMorgan Chase and Citibank, license these databases to run automated real-time screens. Because banks possess an acute aversion to regulatory fines, they engage in "de-risking"—closing entire categories of client accounts based on "fuzzy matching" algorithms that generate false-positive links. These firms enforce strict non-disclosure clauses, preventing targeted organizations from contesting or correcting false information.

This structural coercion is further amplified by IRC Section 501(p), enacted under the Military Family Tax Relief Act of 2003, which mandates the immediate and automatic suspension of the tax-exempt status of any organization designated as a terrorist entity. This suspension bypasses standard IRS administrative and judicial due process protections. Under Treasury Regulation Section 1.501(c)(3)-1(b)(4), upon dissolution, a non-profit's assets must be transferred to another 501(c)(3) entity.

However, under the International Emergency Economic Powers Act (IEEPA) and Executive Order 13224, transferring property belonging to an SDN is a criminal act. This structural conflict traps assets, resulting in complete legal and corporate paralysis.

The real-world execution of this financial blockade is illustrated by the Campaign Against the Alliance for Global Justice (AfGJ). AfGJ, a progressive non-profit sponsoring over 140 projects, sponsored *Collectif Palestine Vaincra*, an affiliate of the *Samidoun Palestinian Prisoner Solidarity Network*.

In January 2022, Zachor sent formal demand letters to Salsa Labs (AfGJ's fundraising software

provider), warning of civil and criminal liability under the ATA. In February 2023, Salsa Labs' payment processor, CardConnect, terminated its contract, instantly shutting down online fundraising for AfGJ and all 140 sponsored projects.

When AfGJ attempted to migrate to Stripe, Zachor and 11 pro-Israel organizations pressured Stripe's leadership and successfully lobbied Representatives Elise Stefanik and Mike Lawler to publicly threaten federal investigations. Subsequently, PayPal, Discover, Visa, Mastercard, American Express, Donorbox, and Plaid terminated processing services for any portals linked to Samidoun or AfGJ, completing their total financial de-platforming.

Forensic Conclusions and Strategic Policy Implications

The systematic alignment of National Security Council memoranda, Department of the Treasury economic warfare rules, and think-tank sanctions blueprints throughout the FY 2025–2026 cycle demonstrates that United States Near East policy is directly driven by a highly integrated, privately funded capital-to-placement pipeline. Rather than originating from independent executive branch review or career civil service analysis, strategic national security decisions—most notably the modification of SWIFT access for Iranian central banking and the implementation of Operation Epic Fury—have been designed by think-tank advisors and subsequently ingested into administrative law.

This structural capture is achieved by exploiting a combination of domestic regulatory loopholes and advanced automated technologies. The deployment of Schedule F dismantled career-level bureaucratic vetting, allowing FDD and JINSA alumni to directly draft the administrative orders implementing their own policy papers.

Concurrently, the Glazer Framework and FARA-mitigation arbitrage provided complete legal insulation for foreign state partners to match domestic philanthropic funding, using anonymized donor-advised fund networks to clear international transactions through specialized bank accounts.

On the domestic enforcement front, the integration of Reportify AI with Google Jigsaw's Perspective API and private risk databases has successfully outsourced censorship and civil rights enforcement to algorithmic networks.

By automatically escalating civil rights complaints and injecting white-label linguistic databases directly into social media moderation platforms, this system executes machine-speed suppression of alternative journalistic and open-source intelligence streams.

When combined with the weaponization of AML/CFT frameworks and IRC Section 501(p), this network possesses the unilateral power to trigger total financial de-platforming and legal paralysis for domestic non-profits and anti-war organizations, bypassing constitutional protections through private sector intermediate agencies.

The findings of this audit indicate that the traditional distinction between private policy formulation and sovereign public enforcement has been functionally erased, resulting in a hybrid public-private economic warfare apparatus.

Works cited

1. Richard Goldberg - FDD, <https://www.fdd.org/team/richard-goldberg/> 2. The Iran Breakdown - FDD, <https://www.fdd.org/category/podcasts/the-iran-breakdown/>