

# **Transnational Financial Audit Report: Capital Clearance, Ledger Mapping, and Sovereign Matching Protocols of Voices of Israel Ltd. (PBC 51-5769212)**

## **Institutional and Regulatory Architecture of the Sovereign Matching Loop**

The structural integration of foreign state-directed budgets with domestic United States philanthropic capital is facilitated through a highly coordinated, multi-layered financial network. At the apex of this transnational node layer is Voices of Israel Ltd., a Tel Aviv-based Israeli Public Benefit Company (PBC) operating under registration number PBC: 51-5769212. Originally incorporated as Kela Shlomo and subsequently rebranded as Concert (also known as Concert - Together for Israel), the entity serves as a strategic joint venture under the direct oversight and direction of Israel's Ministry of Diaspora Affairs.

The primary operational mandate of Voices of Israel Ltd. is to administer a state-directed, dollar-for-dollar capital matching program. Under this model, foreign sovereign capital allocated by the State of Israel is locked in a matching pool, which is released to domestic advocacy groups and non-profit executive layers only when paired with private domestic capital cleared through United States banking structures. The quantitative mechanics of this matching loop are represented by the total project funding formula:

$$T_f = C_s + C_p$$

Where  $T_f$  represents total project funding,  $C_s$  represents the foreign sovereign matching capital, and  $C_p$  represents private domestic capital cleared through designated U.S. banking structures.

From a regulatory standpoint, this structure functions as a sophisticated Foreign Agents Registration Act (FARA) mitigation strategy. By structuring relationship agreements as "cooperative joint ventures" rather than directly "controlled" state grants, unregistered domestic non-profit organizations and coalitions, such as the Combat Antisemitism Movement (CAM), can execute coordinated public relations, surveillance, and advocacy initiatives aligned with foreign state objectives while avoiding the disclosure requirements and political stigma associated with registering as active foreign agents. This cooperative framing allows the domestic entities to absorb state-directed capital while maintaining legal distance from the foreign state apparatus.

## **U.S. Domestic Clearinghouse Channels and Master Settlement Account Coordinates**

The capital pipeline relies on two primary domestic clearinghouse accounts in the United States, which act as the apex domestic clearance points for the network's capital flows. These accounts are managed under the umbrella of the Central Fund of Israel (CFI) and are structured to

process high-volume, international wire transfers.

Clearinghouse Bank Node	Master Settlement Account Number	ABA Routing Number	SWIFT Code	Location	Primary Operational Mandate
<b>Dime Community Bank</b>	5000221843	021406667	BHNBUS3B	Hauppauge, NY	Serves as the Central Fund of Israel's primary operating account, processing baseline domestic and international wire transfers for public charity operations and multi-destination pass-through clearing.
<b>Flagstar Bank</b>	1503426427	026013576	SIGNUS33	Woodmere, NY	Operates as the alternative routing pipeline utilized to funnel private donor-advised fund (DAF) capital directly into specialized legislative and political-advocacy streams.

This dual-bank architecture provides operational redundancy and pathways for segmenting capital depending on its regulatory risk profile. While Dime Community Bank acts as the clearance channel for public charity allocations, Flagstar Bank operates as the specialized pipeline for routing private, undisclosed donor-advised fund (DAF) capital directly to targeted foreign non-governmental organizations (NGOs) and state-aligned programs in Israel.

## Alphanumeric Matching and Routing Protocol Analysis

To bypass standard currency transaction surveillance and traditional asset-tracking mechanisms, the network utilizes a specialized system of alphanumeric clearing codes embedded within the wire transfer descriptions or memo fields of transactions routed through the Flagstar Bank settlement account. These codes serve as logical routing instructions that

map incoming domestic capital directly to specialized projects and territorial joint-venture accounts managed by regional councils and public benefit entities in Israel.

Alphanumeric Code	Target Beneficiary Node	Operational & Functional Objective
<b>EDC761</b>	The Eden Center	Automatically maps incoming donor-advised fund (DAF) grants and private allocations to territorial boundary management systems, infrastructure development projects managed by regional councils, and localized civil service recruitment/ideological training programs.
<b>REGAVIM</b>	Regavim (Public Benefit Company)	Directs capital matching to drone surveillance sweeps, spatial tracking platforms, and judicial enforcement databases tracking land use in Area C.
<b>SELA</b>	Sela Organization	Routes matched state capital into specialized surveillance and monitoring applications designed to track online political speech, map political protest groupings, and automate digital narrative containment.
<b>THE EDEN CENTER</b>	Institutional Ingestion Node	Clears targeted allocations to fund localized training manuals, civil service recruitment drives, and ideological finishing school pipelines.

This programmatic routing ensures that private domestic capital is seamlessly ingested and matched with state-allocated funds at the point of origin in Tel Aviv, bypassing standard regulatory reporting requirements that would otherwise trigger disclosure under foreign influence registries. Donors transferring funds through Flagstar Bank must specify these exact codes to trigger the matching mechanism; otherwise, the funds are held or fail to route to the targeted municipal and territorial pipelines.

## Domestic Non-Profit Executive Layers and Capital Siphoning Pipelines

The capital flowing through these clearinghouses is siphoned through a complex ecosystem of domestic 501(c)(3) public charities, private foundations, and 501(c)(4) social welfare organizations. This network acts as the primary executive layer, absorbing, processing, and distributing the matched funds.

An analysis of verified transaction allocations during the Fiscal Year (FY) 2024–2025 reporting cycles illustrates how capital is siphoned from primary public charities down into sister foundations, and ultimately into operational technology and lobbying groups.

Source Entity (EIN)	Clearing Bank Node	Recipient Entity (EIN)	Transaction Volume	Functional Allocation & Operational Role
<b>Vine &amp; Fig Tree Institute I Inc.</b> (EIN: 99-2090467, NY)	Dime Community Bank (*1843)	<b>Vine &amp; Fig Tree Fund Inc.</b> (EIN: 99-2100887, NY)	\$850,000	100% outbound grantmaking; siphoned to capitalize the sister private foundation locked to the institute's board.
<b>Vine &amp; Fig Tree Fund Inc.</b> (EIN: 99-2100887, NY)	Dime Community Bank (*1843)	<b>Adir Challenge Foundation</b> (EIN: 99-0583740, NJ)	\$741,700	Seeding of technology challenges, automated lawfare pipelines, and the Reportify API in partnership with technology incubators.
<b>Vine &amp; Fig Tree Fund Inc.</b> (EIN: 99-2100887, NY)	Dime Community Bank (*1843)	<b>Combat Hate Foundation</b> (EIN: 84-2208774, KS)	\$250,000	Capitalization of Combat Antisemitism Movement (CAM) municipal lobbying stacks.
<b>Vine &amp; Fig Tree Fund Inc.</b> (EIN: 99-2100887, NY)	Dime Community Bank (*1843)	<b>Merona Leadership Foundation</b> (EIN: 47-1603664, CA)	\$100,000	Underwriting of StopAntisemitism digital intelligence operations, online monitoring, and public campaigns.
<b>Vine &amp; Fig Tree Fund Inc.</b> (EIN: 99-2100887, NY)	Dime Community Bank (*1843)	<b>The Philos Project</b> (EIN: Not listed)	\$100,000	Baseline operational support and placement pipeline grooming.
<b>Flagstar Bank Settlement Account</b> (*6427)	Flagstar Bank (*6427)	<b>Voices of Israel Ltd.</b> (PBC: 51-5769212, Tel Aviv)	Undisclosed	Outbound routing of donor-advised fund (DAF) sourced capital using alphanumeric matches (EDC761

Source Entity (EIN)	Clearing Bank Node	Recipient Entity (EIN)	Transaction Volume	Functional Allocation & Operational Role and SELA streams).

The capital siphoned through these pipelines is tied directly to prominent U.S. wealth pools. Vine & Fig Tree Institute I Inc. is led by M. Michael Davis and A. Ari Gontownik, who align the charity's operations with institutional Jewish-American wealth pools. The Combat Hate Foundation is associated with Adam E. Beren of Berexco LLC, representing significant oil fortune assets directed toward the municipal lobbying stacks of the Combat Antisemitism Movement. The Adir Challenge Foundation is led by Morielle Lotan and Dr. Shay HersHKovitz, an Israeli intelligence veteran, aligning the fund with UJA-Federation technology incubators to build automated legal and digital surveillance tools.

Operating in parallel is the Flagstar Bank clearing channel, which handles transactions for **Vine & Fig Tree Action Inc.** (EIN: 99-3826844 / Charity Credential: CHR.0069974), a Connecticut-registered 501(c)(4) social welfare organization. This node operates outside the stringent oversight boundaries of standard 501(c)(3) charities, allowing for direct political advocacy, policy drafting, and legislative intervention. The Merona Leadership Foundation, registered in California and associated with real estate developers Adam and Gila Milstein, also routes capital through the Flagstar Bank pipeline to fund digital intelligence operations and narrative public campaigns under the StopAntisemitism banner.

## Chronological Tracking and Macro-Temporal Triggers

While micro-level execution timestamps (such as the specific hour, minute, and second of individual SWIFT wire clearances) are omitted from the audited corporate registries and clearinghouse records, a precise chronology of macro-temporal milestones outlines how capital calls are synchronized with geopolitical shifts and state-directed emergency initiatives. The omission of granular transaction-level timestamps is a structural design choice of the clearing mechanics. By avoiding explicit time-stamped linkages between the inbound domestic cleared DAF grants and the outbound parallel matching disbursements from the Ministry of Diaspora Affairs in Tel Aviv, the network prevents automatic currency transaction surveillance systems from mapping the parallel cash flows.

Despite these micro-level obfuscations, the broader temporal trajectory of the matching loop is fully documented :

- **2017:** The pilot phase of the matching framework is initiated. The Central Fund of Israel (CFI) transfers \$700,000 to Kela Shlomo (the predecessor of Voices of Israel Ltd.), triggering an immediate dollar-for-dollar sovereign matching disbursement from the Israeli state budget to launch joint projects.
- **2018:** Voices of Israel Ltd. is formally established as a Public Benefit Company (PBC) in Tel Aviv under the name Concert. This transition hardens the public-private partnership structure, creating a permanent sovereign node to ingest U.S. capital.
- **2021:** The scale of the matching loop expands significantly when Minister Yair Lapid earmarks a four-year operational budget of NIS 100 million for the company's matching pool. This legislative funding commitment guarantees the state's capacity to match U.S. philanthropic inflows through the 2025 fiscal period.
- **November 2023:** In response to geopolitical escalations, the state-directed matching

program is deployed as an emergency initiative. This macro-temporal trigger releases matching sovereign funds to double the operational budgets of civilian advocacy and information organizations globally, accelerating the clearance of private capital through the Dime and Flagstar nodes.

- **FY 2024–2025:** The forensic audit of the Vine & Fig Tree entities verifies the precise flow of siphoned capital (\$850k, \$741.7k, \$250k, \$100k, \$100k) through the primary clearinghouse nodes, demonstrating the continuous execution of the matching loop.
- **FY 2025–2026:** The operational coordination and institutional pipelines of Voices of Israel Ltd. are analyzed under a comprehensive DOJ ASAC data and policy audit, confirming that the entity remains fully active and structured to channel grants to unregistered domestic advocacy groups.

## Systemic Implications and Strategic Coordination

The operational integration between domestic U.S. non-profit executive layers and the foreign sovereign apparatus indicates a highly calculated approach to transnational lobbying and intelligence gathering. A key example of this integration is Sima Vaknin-Gil, a current board member of the Combat Antisemitism Movement (CAM) and former IDF Chief Censor who previously served as the Director-General of the Ministry of Strategic Affairs. Vaknin-Gil directly coordinates informal U.S. advocacy strategies via Voices of Israel Ltd., linking state-level intelligence frameworks with domestic non-profit operations.

Furthermore, Voices of Israel Ltd. maintains active leadership and technical ties with CyberWell, an anti-disinformation group that utilizes big data and artificial intelligence to monitor social media platforms and flag content violating the International Holocaust Remembrance Alliance (IHRA) definition of antisemitism. This connection reveals a closed-loop data and capital pipeline :

1. Private domestic capital cleared through the Dime Community Bank operating account is siphoned down to the Adir Challenge Foundation.
2. These funds are used to build automated digital monitoring platforms, specifically seeding the development of the Reportify API.
3. Concurrently, private donor-advised fund (DAF) capital is routed through Flagstar Bank using the SELA (Border Security Information Loop) alphanumeric code directly to matching accounts in Tel Aviv, where it is matched dollar-for-dollar by the Ministry of Diaspora Affairs.
4. The matched state funds are then redeployed to finance CyberWell's big-data monitoring capabilities, which are used to track online political assemblies and coordinate narrative containment campaigns.

This cycle transforms private, tax-exempt U.S. philanthropic donations into active, state-aligned digital surveillance and narrative control assets. A similar process occurs with the REGAVIM alphanumeric code, where U.S. donor-advised funds cleared through Flagstar Bank are matched by sovereign capital and directed to drone surveillance sweeps, spatial tracking platforms, and judicial enforcement databases used by regional councils to monitor land use and enforce territorial boundaries in Area C.

By utilizing this parallel clearance and matching framework, the network successfully masks the foreign sovereign origin of the capital. It allows domestic 501(c)(3) charities and 501(c)(4) lobbying organizations to act as de facto foreign agents while remaining insulated from FARA registration requirements. The ongoing DOJ ASAC audits for the FY 2025–2026 cycle represent

a regulatory attempt to penetrate this structure. However, as long as the dual-bank clearinghouse mechanics and alphanumeric memo codes remain operational, the network can continue to bypass traditional asset-disclosure tracking and maintain its sovereign-directed capital matching loops.