

AUSTIN KNUDSEN



STATE OF MONTANA

February 12, 2026

Hon. Pamela Bondi  
Attorney General of the United States  
United States Department of Justice  
950 Pennsylvania Ave., NW  
Washington, D.C. 20530

Hon. John Eisenberg  
Assistant Attorney General for National Security  
United States Department of Justice  
950 Pennsylvania Ave., NW  
Washington, D.C. 20530

Dear Attorney General Bondi and Assistant Attorney General Eisenberg:

We write to respectfully request that the Justice Department investigate over 150 U.S.-based organizations which over the past decade have collectively received nearly \$2 billion in foreign dark money from five organizations that push extreme policies and fund left-wing green-energy and climate advocacy: (1) Oak Foundation (“Oak”); (2) Children’s Investment Fund Foundation (“CIFF”)<sup>1</sup>; (3) Quadrature Climate Foundation (“QCF”); (4) KR Foundation (“KR”); and (5) Laudes Foundation (“Laudes”). At least one of the five foreign organizations, CIFF, has documented ties to the Chinese Communist Party. And all five foreign entities use funding to direct climate activism and influence energy policy in the United States, including by funding U.S. policy fights, litigation, research, protests, and lobbying to advance an extreme, foreign, activist agenda.<sup>2</sup> An October 2025 report from Americans for Public Trust traces the foreign dark money from these five left-wing organizations to over 150 U.S.-based 501(c)(3) entities.

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<sup>1</sup> A coalition of State Attorneys General recently sent a letter on December 16, 2025, highlighting CIFF’s ties to China, as well as requesting that the Department of Justice investigate two U.S.-based groups, Energy Foundation China and Center for Climate Integrity for potential violations of FARA. This letter requests that the Department likewise investigate the other 37 organizations identified in the APT report into which CIFF has funneled millions of dollars of foreign money. Letter from 26 State Attorneys General to DOJ (Dec. 16, 2025), <https://perma.cc/VKR3-783U>.

<sup>2</sup> *Foreign Charities Fueling Extreme Policies in the U.S.*, AMS. FOR PUB. TR. (Oct. 2025), <https://perma.cc/AT4Q-GTGS> (“APT Report”).

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The over 150 domestic entities that have received funding from the five foreign organizations engage in policy advocacy on local, state, and federal levels; media and messaging campaigns; climate litigation funding; research coordination and funding; policy consulting; climate grantmaking; coordinated lobbying; grassroots organizing; and planning and funding climate protests.<sup>3</sup> Among those organizations which have accepted the most money from these foreign funding groups are the following:

- ClimateWorks Foundation (\$344 million)
- Energy Foundation China (\$88 million)
- Grantham Foundation (\$80 million)
- Growald Climate Fund (\$80 million)
- New Venture Fund (\$67 million)
- The Windward Fund (\$49 million + \$12 million)
- The Sunrise Project (\$35 million + \$9 million)
- Oceana (\$30 million)
- NEO Philanthropy (\$26 million)
- Carter Center (\$25 million)
- Rockefeller Philanthropy Advisors (\$22 million + \$108 million)
- World Resources Institute (\$17 million)
- Center for International Environmental Law (\$5 million)

There is substantial evidence that many of the over 150 organizations identified in the APT Report have acted as unregistered agents of foreign principals. For these reasons, we respectfully request that the Justice Department investigate the over 150 U.S.-based organizations for potential violations of the Foreign Agents Registration Act (“FARA”).

## **I. Background**

### **A. Foreign Funding Sources**

#### **1. Oak Foundation**

The Oak Foundation is a Swiss-based group established in 1983 by British billionaire Alan M. Parker. Oak has supported extreme “net zero” initiatives, groups pushing to implement the Paris Climate Accords, and groups opposing the Keystone XL pipeline.<sup>4</sup> Oak has supported the approach of “using finance as a lever for change to challenge the fossil fuel sector,” and Oak itself states that it supports “efforts that use innovative and disruptive finance strategies to end public money for coal, oil, and gas expansion or production.”<sup>5</sup> Among the “disruptive financial strategies” Oak employs is funding U.S.-based groups that facilitate climate litigation against energy companies at local, municipal, and state levels.<sup>6</sup> In total,

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<sup>3</sup> The names of the over 150 groups registered as U.S.-based 501(c)(3) charitable organizations and the amounts they received from each of the foreign funding organizations are listed in the APT Report. *Id.* at 21–31.

<sup>4</sup> *Id.* at 11.

<sup>5</sup> *Id.* (internal quotations omitted).

<sup>6</sup> *Id.*

Oak has given \$750 million of foreign money to 152 U.S.-based groups.<sup>7</sup> Among the top U.S.-based groups receiving Oak funding are ClimateWorks Foundation (\$186 million), Rockefeller Philanthropy Advisors (\$108 million), New Venture Fund (\$67 million), Energy Foundation China (\$13 million), the Natural Resources Defense Council (\$6.5 million), and Center for International Environmental Law (\$5 million).<sup>8</sup>

Oak's grant-making page describes that Oak makes grants only to organizations that align with their "programme areas."<sup>9</sup> Oak subjects grantees to a "rigorous due diligence and selection process, which includes extensive discussion, financial reviews, and site visits to ensure that organisations have robust internal processes and controls, a clear strategy, and the capacity to thrive."<sup>10</sup> Oak also states that "the majority of awards are multi-year in duration," demonstrating that grantees enter into an ongoing relationship with Oak.<sup>11</sup> These expectations are formalized in a letter to the grantee which "aligns expectations about the terms of the grant" and which both Oak and the grantee sign.<sup>12</sup> Oak also states "[w]e support our partners' capacity to assess and measure progress," suggesting an ongoing involvement and supervision of grantees' "progress."<sup>13</sup>

## 2. Quadrature Climate Foundation

The Quadrature Climate Foundation was established in 2019 as the philanthropic arm of the London-based hedge fund Quadrature Capital, which gave the "largest single donation ever" to the UK's Labour Party.<sup>14</sup> Members of the hedge fund, including its two secretive billionaire founders, Greg Skinner and Suneil Setiya, provide funding to QCF to issue grants. QCF uses its grants to fund research and campaign groups, aiming to "steer[] the direction of both research and *lobbying on the green transition*," including through almost \$530 million in foreign money to 41 U.S.-based groups.<sup>15</sup> Among the top recipients of QCF funding and grants are ClimateWorks Foundation (\$147 million), Growald Climate Fund (\$80 million), the Grantham Foundation (\$80 million), the Windward Fund (\$49 million), and the Sunrise Project (\$36 million).<sup>16</sup>

QCF describes itself as taking a "strategic approach" to "help[] us drive meaningful climate solutions that influence systems, policies, and practices globally."<sup>17</sup> It describes its three key objectives as "reducing greenhouse gas emissions, removing greenhouse gasses, and

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<sup>7</sup> *Id.*

<sup>8</sup> *Id.* at 12.

<sup>9</sup> [Grant-making](#)

<sup>10</sup> [Grant-making](#).

<sup>11</sup> [Grant-making](#)

<sup>12</sup> [2. Grant Application Review Stages Mia](#)

<sup>13</sup> [Grant-making](#)

<sup>14</sup> APT Report at 4, *supra* n.2.

<sup>15</sup> *Id.* (emphasis in original)

<sup>16</sup> *Id.* at 5.

<sup>17</sup> *Impact Framework*, QUADRATURE CLIMATE FOUND. at 2, <https://perma.cc/58RY-R2LW> ("QCF Impact Framework").

responding effectively to climate impacts.” To accomplish these goals, QCF lists among the tools in its “toolkit” engaging in policy advocacy and “running movements and campaigns.”<sup>18</sup>

Additionally, QCF monitors grantees and collects data from their programs “to assess QCF’s contributions.”<sup>19</sup> According to QCF’s “Impact Framework,” it closely “track[s] the contribution of our programmes to climate solutions that reduce and remove emissions.”<sup>20</sup> QCF collects and monitors data from its partners through a “structured approach to data collection across our goals and our portfolio.”<sup>21</sup> In part, QCF uses its data collection to “understand how programmes are progressing, so we can provide tailored support.”<sup>22</sup> As one would expect when receiving grants for tens or even hundreds of millions of dollars, QCF grantees are subject to ongoing monitoring and reporting requirements to QCF so that QCF can provide “tailored support” and involvement.

### 3. Children’s Investment Fund Foundation

The Children’s Investment Fund Foundation,<sup>23</sup> run by billionaire and activist hedge-fund manager Christopher Hohn, has sent over \$553 million to U.S.-based groups to push extreme climate and environmental policies.<sup>24</sup> In addition to its extreme climate agenda, CIFF maintains ties to China and the CCP.<sup>25</sup> From 2014 to 2023, CIFF has given money to 39 U.S.-based groups, including The Energy Foundation China (“EFC”) (\$70 million), The Sunrise Project (\$36 million), the Institute for Governance and Sustainable Development (\$25 million), and the Environmental Defense Fund (\$17 million).<sup>26</sup>

CIFF is a registered charity in England and Wales committed to “accelerating solutions that will mitigate climate change.”<sup>27</sup> In particular, Hohn has funded and supported efforts to “batter companies with litigation and threats” to pressure businesses to report and reduce their carbon emissions.<sup>28</sup> In addition, CIFF has documented ties to China, where it is registered as an NGO, and the Chinese Communist Party (CCP) whose former officials now serve on the NGO’s board.

CIFF describes a rigorous process for selection and oversight of grantees, including “a full programme budget and mapped work plan [] developed by the grantee and the [Foundation]

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<sup>18</sup> *Id.*

<sup>19</sup> *Id.* at 3.

<sup>20</sup> *Id.* at 2.

<sup>21</sup> *Id.* at 3.

<sup>22</sup> *Id.*

<sup>23</sup> A coalition of State Attorneys General recently sent a letter on December 16, 2025, highlighting CIFF’s ties to China, as well as requesting that the Department of Justice investigate two U.S.-based groups, Energy Foundation China and Center for Climate Integrity for potential violations of FARA. This letter requests that the Department likewise investigate the other 37 organizations identified in the APT report into which CIFF has funneled millions of dollars of foreign money. Letter from 26 State Attorneys General to DOJ (Dec. 16, 2025), <https://perma.cc/VKR3-783U>.

<sup>24</sup> APT Report at 16, *supra* n.2.

<sup>25</sup> See Letter from 26 State Attorneys General to DOJ (Dec. 16, 2025), <https://perma.cc/VKR3-783U>.

<sup>26</sup> APT Report at 17, 30–31, *supra* n.2.

<sup>27</sup> *Id.*

<sup>28</sup> *Id.* at 16.

sector teams during the due diligence phase,” and approvals obtained by the Board and/or Programme Investment Committees.<sup>29</sup> Additionally, all grantees must submit “performance reviews” and grant funding is conditioned “upon adherence to the work-plan, budget[s],” “milestones,” and other criteria.<sup>30</sup> This express contracting, as well as ongoing supervision and monitoring of grantees for compliance with CIFF’s goals is strong evidence of agency relationships between CIFF and its grantees.

#### 4. KR Foundation

The KR Foundation, based in Copenhagen, Denmark, has spent over \$36 million to influence U.S. climate policy, including “almost \$500,000 to Sustainable Markets Foundation for ending fossil fuel advertising, over \$300,000 to 350.org for fossil-fuel-divestment campaigns, and \$250,000 to Center for International Environmental Law for accelerating the managed decline of oil and gas.”<sup>31</sup> While the overall size of KR’s grants is not as large as the other foreign charities listed above, KR “has had a significant hand in American energy policy by funding everything from climate litigation, to U.S. climate protests, to pushing back against pro-energy legislation passes on the state level.”<sup>32</sup>

KR strategically seeks groups and movements that will have a sway on American opinion or policy on climate-related issues. KR has given nearly \$400,000 to the Conservation Law Foundation, a group that has initiated multiple climate lawsuits against the Trump administration and energy companies and has engaged in aggressive lobbying campaigns, including for the passage of climate superfund laws in Vermont and New York.<sup>33</sup> Likewise, KR has given nearly \$1.4 million to CIEL, a key proponent of legal and messaging campaigns for climate liability for carbon producers.<sup>34</sup>

KR has also given over \$300,000 to Stop the Money Pipeline, a fiscally sponsored project of 350 Seattle.<sup>35</sup> That foreign money was expressly earmarked for “Advancing Climate Financial Regulation and Pushing Back on the Anti-ESG Movement in the USA,” indicating a clear desire to influence public opinion in the U.S.<sup>36</sup>

KR’s terms and conditions for administration of grants imposes “regular reporting requirements” which include a “Narrative Progress Report” and an “Interim Financial Statement.”<sup>37</sup> KR also conditions the release of the final ten percent of the grant amount “upon approval of the grantee’s final reporting.”<sup>38</sup> Additionally, the grant terms provide that

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<sup>29</sup> *Annual Report 2024*, CHILDREN’S INV. FUND FOUND. at 40 (May, 22 2025), <https://perma.cc/DW5P-5PA8> (“CIFF 2024 Ann. Report”).

<sup>30</sup> *Annual Report 2023*, CHILDREN’S INV. FUND FOUND. at 35 (June 13, 2024), <https://perma.cc/6VWW-DVQS> (“CIFF 2023 Ann. Report”).

<sup>31</sup> APT Report at 7 (internal quotations omitted), *supra* n.2.

<sup>32</sup> *Id.*

<sup>33</sup> *Id.* at 9.

<sup>34</sup> *Id.*

<sup>35</sup> *Id.*

<sup>36</sup> *Id.*

<sup>37</sup> *Terms and Conditions for Administration of Grants*, KR FOUND. at 2 (Nov. 12, 2019), <https://perma.cc/75AY-PXXQ> (“KR Found. Grant Terms”).

<sup>38</sup> *Id.*

“[t]he Foundation reserves the right to demand supervision, research, monitoring and evaluation of the activities using own consultants, who should at any time have unlimited access to all information. The grantee accepts to bear own costs related to presenting information and participating in meetings and in activities relating to such monitoring, research and evaluation activities as may be required by the Foundation.”<sup>39</sup> Such ongoing reporting and supervisory provisions set forth in a detailed grant agreement is strong evidence of an agency relationship.

## 5. Laudes Foundation

The Laudes Foundation was established in Switzerland in 2020 by the Brenninkmeijer family as a philanthropic venture with a mission to combat climate change, biodiversity loss, and social inequality.<sup>40</sup> Since then it has funneled nearly \$20 million of foreign funding into U.S.-based groups.<sup>41</sup> Its goals include influencing policymakers, businesses, and the financial sector “to do the right thing,” which it defines as implementing laws and policies requiring action on climate and equity and inclusion.<sup>42</sup> Among the top U.S.-based groups Laudes has funded are The Pulitzer Center for Crisis Reporting (\$3.7 million), the World Resources Institute (\$2.8 million), Ceres (\$1.7 million), and Community Initiatives (\$1 million).<sup>43</sup>

Laudes’ grant information page states its requirement that each grantee’s “project aligns with our mission and priorities.”<sup>44</sup> Additionally, under the heading “Start of partnership” Laudes provides “[u]pon approval, we will sign a grant agreement outlining the grant activities, intended outcomes, general terms and conditions as well as the reporting and disbursement schedule.”<sup>45</sup> Laudes also publishes a guide for reporting requirements for grantees described as “Measurement and Evaluation.”<sup>46</sup> This guide describes annual reports and follow-up meetings with a Laudes point of contact for the duration of the grant.<sup>47</sup> These ongoing reporting requirements, express grant agreements and terms, and continued “partnership” with Laudes strongly suggest an agency relationship between Laudes and its U.S.-based grantees.

## B. U.S. Domestic Entities

A recent report from Americans for Public Trust (“APT”) provides a complete list of the U.S.-based 501(c)(3) charitable organizations that collectively receive hundreds of millions of dollars annually from the five organizations discussed above.<sup>48</sup> While this letter does not

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<sup>39</sup> *Id.*

<sup>40</sup> APT Report at 14, *supra* n.2.

<sup>41</sup> *Id.*

<sup>42</sup> *Id.*

<sup>43</sup> *Id.* at 15.

<sup>44</sup> *Becoming a Partner*, LAUDES FOUND. at 1–2, <https://perma.cc/CJR8-WFQJ> (“Laudes Becoming a Partner”).

<sup>45</sup> *Id.*

<sup>46</sup> *Measurement and Evaluation for Learning and Improvement*, LAUDES FOUND., <https://perma.cc/WUM4-6R7Q> (“Laudes Initiative Requirements”).

<sup>47</sup> *Id.* at 2.

<sup>48</sup> APT Report at 21–31, *supra* n.2.

provide a complete investigation of each of the over 150 domestic entities listed in the APT report, it highlights those entities which have received the largest grants or which have engaged in particularly extreme climate-related activism.

## 1. ClimateWorks Foundation

ClimateWorks Foundation is the largest recipient of foreign money documented in the APT Report with a combined nearly \$344 million over the past decade from the foreign entities discussed above.<sup>49</sup> ClimateWorks is a San Francisco-based 501(c)(3) and left-wing pass-through funding entity “that distributes funds from donors to environmentalist advocacy groups around the world.”<sup>50</sup> ClimateWorks aims to combat global warming and cut emissions by “fund[ing] bold climate strategies.”<sup>51</sup> ClimateWorks has received large grants to “support the acceleration of electric vehicles” and “financial regulation advocacy to address climate risk.”<sup>52</sup> ClimateWorks in turn has issued over 2,800 grants totaling over \$2 billion since 2008, including to “Center for American Progress (CAP), CERES, Environmental Defense Fund (EDF), League of Conservation Voters (LCV), New Venture Fund, and Windward Fund,” operating as a “foreign dark money ATM to fuel other liberal climate advocacy groups.”<sup>53</sup> Many of the groups it funds “lobby for climate-based policies including emissions taxes, restricting coal use, international climate treaties with strict enforcement mechanisms, and diminishing the use of cars.”<sup>54</sup> In addition to its grantmaking, ClimateWorks “advances its left-of-center environmentalism through a wide array of projects, international partnerships, and campaigns, including its [] Project Catalyst and its 2021 ‘Drive Electric Campaign’ which seeks to prohibit the new sale of combustion engine vehicles in phases by 2040.”<sup>55</sup>

## 2. Grantham Foundation

The Grantham Foundation for the Protection of the Environment (private foundation) and the related Grantham Trust (public charity) have received over \$80 million from QCF, \$50 million of which is earmarked for a “partnership to unlock neglected climate opportunities.”<sup>56</sup> Grantham’s website landing page boldly claims “[c]limate change is the greatest challenge humanity has ever faced,” and that “[h]umanity’s impact on the planet is out of control.”<sup>57</sup> Grantham reveals its ultimate goal of upending the economic order claiming we need “[n]ew kinds of breakthroughs [to] make the remaking of our economy easier.”<sup>58</sup> To that end,

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<sup>49</sup> *Id.*

<sup>50</sup> *ClimateWorks Foundation*, INFLUENCEWATCH, <https://perma.cc/L4LJ-BGPL> (“ClimateWorks Information”).

<sup>51</sup> *How We Work*, CLIMATEWORKS FOUND., <https://perma.cc/U4XH-JTQT> (“ClimateWorks Approach”).

<sup>52</sup> APT Report at 5, *supra* n.2.

<sup>53</sup> *Id.*; ClimateWorks Approach, *supra* n.51.

<sup>54</sup> ClimateWorks Information, *supra* n.50.

<sup>55</sup> *Id.*; *Home*, DRIVE ELEC. CAMPAIGN, <https://perma.cc/4A4L-GCNW> (“Drive Electric Campaign Information”); Monica Araya & Anthony Eggert, *The Drive Electric Campaign: 100% Electric Road Transportation for the World*, CLIMATEWORKS FOUND. (Mar. 17, 2021), <https://perma.cc/EB9N-KN39> (“Drive Electric Article”).

<sup>56</sup> APT Report at 5, *supra* n.2.

<sup>57</sup> *Home*, GRANTHAM FOUND., <https://perma.cc/69CS-NQQM>.

<sup>58</sup> *Id.*

Grantham funds a range of climate initiatives from “grassroots efforts to stop the development of coal plants” to funding the “Global Trends in Climate Change Litigation” annual report, which tracks climate-related litigation.<sup>59</sup> The Grantham Foundation was founded in 1997 in Boston by British billionaire Jeremy Grantham.<sup>60</sup> Jeremy Grantham is a known “supporter of population control, having suggested the critical population limit of the earth at 10 billion.”<sup>61</sup> The Grantham Foundation has used money it receives to provide grants to numerous climate and environmentalist organizations.<sup>62</sup>

### 3. Growald Climate Fund

Founded in 2007 by Eileen Rockefeller Growald, the Growald Climate Fund distributes grants to fund left-wing “environmentalist causes with a focus on environmentalist energy and the electricity sector.”<sup>63</sup> The Growald Climate Fund has received over \$80 million from QCF which it will presumably use for additional grantmaking for U.S. climate initiatives. Growald uses a “venture philanthropy” model, actively “invest[ing]” in early-stage or innovative climate organizations similar to a venture capital fund.<sup>64</sup> Growald’s stated goal is to engage in high-impact “venture philanthropy” to “catalyz[e] the rapid transition to a clean energy future.”<sup>65</sup> A “core practice of [Growald’s] venture philanthropy approach is to provide grantees with resources and high-touch organizational development and programmatic guidance to help them grow into . . . effective . . . organizations.”<sup>66</sup> Growald emphasizes that their “grantees inspire key financial actors, policymakers, the media and wider movements

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<sup>59</sup> APT Report at 5, *supra* n.2.

<sup>60</sup> *Grantham Foundation for the Protection of the Environment*, INFLUENCEWATCH, <https://perma.cc/7DGG-LR5A> (“Grantham Found. Information”).

<sup>61</sup> *Id.*; Carlo Rotella, *Can Jeremy Grantham Profit From Ecological Mayhem?*, THE NEW YORK TIMES, (Aug. 11, 2011), <https://perma.cc/EW83-TFLX>.

<sup>62</sup> Grantham grantees include “the Acadia Center, American Association for the Advancement of Science, Azuero Earth Project, the Carbon Tracker Initiative, Center for Public Integrity, Climate and Health Research, Climate Foundation, CO2 Sciences, Community Foundation of Southeastern Massachusetts, Conservation Law Foundation, Conservation X Labs, Divecha Centre for Climate Change, Earth Innovation Institute, Environmental Defense Fund, Environmental League of Massachusetts, Greenpeace Fund, Health in Harmony, Linden Trust for Conservation, Lost Light Projects, Metafoundation, New England Forestry Foundation, Oxfam America, Rainforest Action Network, Rethinking Economics, Rockefeller Family Fund, Rocky Mountain Institute, Sierra Club, South Carolina Coastal Conservation, Stichting European Climate Foundation, Sustainability Accounting Standards Board, the Energy Foundation, Union of Concerned Scientists, WGBH Education Foundation, WILD AID, Woods Hole Research Center, and the World Resources Institute.” Grantham Foundation for the Protection of the Environment - InfluenceWatch; A 990-PF: Grantham Foundation for the Protection of the Environment, Return of Private Foundation Exempt From Income Tax (Form 990-PF), 2017, Form 990-PF, Part XV Line 3 – Grants and Contributions Paid During the Year or Approved for Future Payment.

<sup>63</sup> *Growald Climate Fund*, INFLUENCEWATCH, <https://perma.cc/AXP3-ULAA> (“Growald Climate Fund Information”).

<sup>64</sup> *Our Approach*, GROWALD CLIMATE FUND, <https://perma.cc/U53L-WGQC> (“Growald Climate Fund Approach”).

<sup>65</sup> *Id.*

<sup>66</sup> *Id.*



to take on the challenge of change at a critical moment for our collective future.”<sup>67</sup> Among the fund’s first grants was an award “to the ‘Beyond Coal’ campaign, a project of the left[-wing] Sierra Club that works to retire coal plants in favor of environmentalist energy.”<sup>68</sup> The Growald Fund has also issued grants to organizations including the Anti-Defamation League, the Natural Resources Defense Council, the New Venture Fund, and the World Wildlife Fund.<sup>69</sup>

#### 4. New Venture Fund

New Venture Fund was founded in 2006 by Eric Kessler, and it acts as a fiscal sponsor to 170 nonprofit projects, many of which engage in lobbying and civic engagement on behalf of left-wing causes.<sup>70</sup> New Venture Fund provides operational support to the projects that operate under its tax-exempt status, as well as serving as an incubator for early-stage or seed-funded initiatives to eventually become operational nonprofits.<sup>71</sup> NVF also administers grants and provides resources to the projects it houses, including climate and sustainability-related groups.<sup>72</sup> NVF “is the largest 501(c)(3) nonprofit in the network of five nonprofits created and managed by Arabella Advisors, a Washington, D.C.-based philanthropy consulting company that caters to major foundations and organizations on the political Left.”<sup>73</sup> Critics of NVF, “including the *New York Times*, argue that New Venture Fund is a ‘dark money’ organization, serving as a way for left-leaning foundations and donors to anonymously funnel money toward various political advocacy issues, such as attacking vulnerable Republicans or pushing environmental restrictions.”<sup>74</sup> NVF was implicated by the *New York Times*’ criticism of “Arabella’s ‘system of political financing, which often obscures the identities of donors,’ as ‘dark money,’ calling the network ‘a leading vehicle for it on the Left.’”<sup>75</sup> According to public filings, “in 2018, NVF spent \$90,387,850 on ‘civil rights, social action, and advocacy,’ of which \$44,453,476 was spent in grants to other nonprofits,” and “spent \$87,959,941 on ‘environmental programs,’ of which \$60,616,035 was spent in grants to other nonprofits.”<sup>76</sup>

#### 5. Windward Fund

Windward Fund is a nonprofit fiscal sponsor “managed by ‘behemoth liberal dark money nonprofit network’ Arabella Advisors.”<sup>77</sup> It formerly operated under Stacey Abrams and

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<sup>67</sup> *Id.*

<sup>68</sup> Growald Climate Fund Information, *supra* n.63.

<sup>69</sup> *Id.*

<sup>70</sup> APT Report at 13, *supra* n.2.

<sup>71</sup> 2024 Impact Report, NEW VENTURE FUND at 3,6, <https://perma.cc/HC25-4FTM> (“NVF 2024 Impact Report”).

<sup>72</sup> *Id.*

<sup>73</sup> *New Venture Fund*, INFLUENCEWATCH, <https://perma.cc/U3EM-2U2A> (“New Venture Fund Information”).

<sup>74</sup> *Id.*; Kenneth P. Vogel & Katie Robertson, *Top Bidder for Tribune Newspapers Is an Influential Liberal Donor*, THE NEW YORK TIMES (Apr. 13, 2021), <https://perma.cc/CQ2G-9A4X>.

<sup>75</sup> New Venture Fund Information

<sup>76</sup> *Id.*; New Venture Fund Information; Form 990, Department of the Treasury, Internal Revenue Service, New Venture Fund, Return of Organization Exempt from Income Tax 2018, Part III — Statement of Program Service Accomplishments, <https://perma.cc/9L5T-KW7Q>.

<sup>77</sup> APT Report at 5, *supra* n.2.

worked to ban gas stoves and push extreme environmental regulations.<sup>78</sup> In 2024, “Windward Fund awarded over \$154 million to 337 grantees across 48 states and territories,” distributing the money it received from foreign organizations into the U.S.<sup>79</sup> The Windward Fund operates in conjunction with its “sister” nonprofits, the 501(c)(4) Sixteen Thirty Fund and 501(c)(3) New Venture Fund, which both provide similar funding and fiscal sponsorship services to radical left-wing advocacy organizations.<sup>80</sup> Windward acts as “a fiscal sponsor of ‘various projects.’”<sup>81</sup> Windward’s activities include “provid[ing] legal compliance, finance, and HR services to its projects, and additionally seek[ing] to help its projects create greater impact through facilitating connections, providing access to information, and capacity building.”<sup>82</sup>

## 6. The Sunrise Project

The Sunrise Project is a left-wing nonprofit that uses aggressive tactics to bring about the transition from fossil fuels to renewables “as fast as possible.”<sup>83</sup> Among its tactics is coordinating protests against the fossil fuel industry to influence public opinion about U.S. energy policy.<sup>84</sup> Sunrise Project “serves as an activist hub, receiving tens of millions of dollars in grants, that it then disburses in accordance with its strategic plan,” which includes “end[ing] the use of traditional energy” and “campaign[ing] to de-bank the oil and gas industry by pressuring the financial sector and various industries to not do business with it.”<sup>85</sup> Of the tens of millions the group receives in grants, it “regrants roughly two-thirds of the funds out” to “organizations that it believes fit into its global change strategy.”<sup>86</sup> Beyond its grantmaking strategy, “the project also runs a specific initiative aimed at cajoling various aspects of international finance into cutting out traditional energy providers from finance markets and to facilitate weather-dependent energy projects instead. These efforts include targeting and pressuring insurers, asset managers, private banks, central banks, private equity, bond markets, and automakers to shut out the oil and gas industry.”<sup>87</sup>

## 7. Rockefeller Philanthropy Advisors

Rockefeller Philanthropy Advisors (RPA) was among the top recipients of funding from Oak Foundation, from whom it received over \$108 million since 2016.<sup>88</sup> RPA issues hundreds of

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<sup>78</sup> *Id.*

<sup>79</sup> C. Lynn McNair, *Collaboration is Key to Solving Climate Change*, WINDWARD FUND (Nov. 15, 2024), <https://perma.cc/BG6B-GQCU>.

<sup>80</sup> *Windward Fund*, INFLUENCEWATCH, <https://perma.cc/3BWZ-XFZ7> (“Windward Fund Information”).

<sup>81</sup> *Id.*

<sup>82</sup> *Id.*

<sup>83</sup> APT Report at 5, *supra* n.2.

<sup>84</sup> *Id.*

<sup>85</sup> *The Sunrise Project*, INFLUENCEWATCH, <https://perma.cc/LSD7-9U6U> (“Sunrise Project Information”); *About*, THE SUNRISE PROJECT, (Apr. 23, 2018), <https://perma.cc/3EY6-AXRK>; *Grants*, THE SUNRISE PROJECT (June 26, 2018), <https://perma.cc/K33V-MYRW>.

<sup>86</sup> Sunrise Project Information, *supra* n.85.

<sup>87</sup> *Id.*; *Shifting Global Finance Beyond Fossil Fuels*, THE SUNRISE PROJECT (Apr. 14, 2025), <https://perma.cc/4L38-YHGL>.

<sup>88</sup> APT Report at 12, *supra* n.2.

millions of dollars in grants to progressive groups, including over \$400 million in 2023 alone.<sup>89</sup> RPA dispenses contributions it receives from foreign organizations to U.S.-based left-wing groups. Among its largest grants in 2023 were “\$10,247,809 to the Climate Leadership Initiative, \$7,797,805 to Climate Breakthroughs, \$6,633,000 to the Sustainable Markets Foundation, \$5,082,261 to Climate Arc, \$3,910,000 to Oil Change International, \$3,069,696 to the Global Alliance for Incinerator Alternatives, and \$2,853,658 to the World Wildlife Fund.”<sup>90</sup> Aside from its grantmaking operations, RPA also “engages in research, writes papers, and creates coalitions for purposes of guiding donors and foundations,” including “a series of donor guides, addressing issues like gender and climate change.”<sup>91</sup>

#### 8. Center for International Environmental Law

CIEL is a public interest, not-for-profit environmental law firm founded in 1989 in the United States.<sup>92</sup> CIEL accepts foreign grants and uses this money to fund whitepapers and policy research related to extreme climate policies.<sup>93</sup> Among the titles of publications by CIEL are “Accelerating the Managed Decline of Oil and Gas,” “Climate Law, Liability, and Litigation: A New Era in Climate Advocacy,” and “Leveraging legal and financial risk to end global reliance on fossil fuels.”<sup>94</sup> More recently, in an attempt to aid litigation against traditional energy companies, CIEL published “Smoke and Fumes: The Legal and Evidentiary Basis for Holding Big Oil Accountable for the Climate Crisis.”<sup>95</sup> CIEL’s policy advocacy include “oppos[ition] the use of carbon emitting fuels such as petroleum, coal, and low carbon natural gas.”<sup>96</sup> In addition, “CIEL has also joined coalitions that oppose the use of carbon free nuclear power, produced reports opposing the development of carbon free hydro-electric dams, and opposed the deployment of technologies that would remove carbon emissions from the atmosphere.”<sup>97</sup> In 2023, CIEL co-produced a “report that advocated for the World Bank Group to restrict its energy financing to only ‘renewable’ projects.”<sup>98</sup> CIEL also opposes net-zero goals in favor of even more extreme “real zero” goals.<sup>99</sup> CIEL has criticized net zero goals as “hollow” attempts to “mask climate inaction and provide cover for business-as-usual fossil fuel production that spells planetary destruction.”<sup>100</sup> CIEL engages directly in policy advocacy in the U.S. to influence public opinion regarding domestic energy policy.

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<sup>89</sup> *Id.*

<sup>90</sup> *Rockefeller Philanthropy Advisors*, INFLUENCEWATCH, <https://perma.cc/9SFX-9255> (“RPA Information”); *Rockefeller Philanthropy Advisors Inc.*, PROPUBLICA NONPROFIT EXPLORER (2024), <https://perma.cc/D5NJ-WMVT> (“RPA Data”)

<sup>91</sup> RPA Information, *supra* n.90,

<sup>92</sup> *Center for International Environmental Law*, INFLUENCEWATCH, <https://perma.cc/CYW7-BAWQ> (“CIEL Information”).

<sup>93</sup> APT Report at 9, *supra* n.2.

<sup>94</sup> *Id.*

<sup>95</sup> *Id.*

<sup>96</sup> CIEL Information, *supra* n.92.

<sup>97</sup> *Id.*

<sup>98</sup> *Id.*

<sup>99</sup> *Id.*

<sup>100</sup> *Id.*

## 9. Environmental Law Institute

ELI is a left-wing environmentalist legal advocacy organization that runs judicial education programs to teach judges left-wing climate policy and legal theories.<sup>101</sup> The group is also known for teaching and advocating for the “far-left concept of environmental justice.”<sup>102</sup> The group’s Climate Judiciary Project was the subject of a House Judiciary Committee investigation to determine whether the group sought to influence judicial decision-making in climate-related litigation.<sup>103</sup> ELI “develops law and policy, advocates environmentalist policy outcomes to professionals and the public, provides data and analysis, and convenes various groups to address environmental issues.”<sup>104</sup> Additionally, ELI “supports the creation of regulatory rules to address the critical race theory-influenced concept of racial justice, operates the Climate Equity for Local Governments initiative that supports the far-left concept of environmental justice, publishes *The Environmental Law Reporter*, operates an Emerging Leaders Initiative, runs a podcast, and seeks to influence global environmental law and governance practices.”<sup>105</sup>

## 10. Ceres

Ceres Inc. is a Boston-based 501(c)(3) that coordinates institutional investors to influence corporate behavior and push the adoption of radical ESG policies in “every aspect of decision-making” and costly climate disclosures for public energy companies.<sup>106</sup> Ceres was a founding partner and driving force behind the Net Zero Asset Managers Initiative and Climate Action 100+, which brought together asset managers from around the world to engage in a coordinated effort to push for ESG policies and emissions disclosures from portfolio companies.<sup>107</sup> Ceres and its related initiatives “leverage[d] a network of investors totaling more than \$32 trillion in assets to pressure companies into adopting Ceres’ preferred [climate and ESG] policies.”<sup>108</sup> Ceres’ own stated purpose is to “pressure stock exchanges and capital market regulators to improve climate and sustainability risk disclosure, and opportunities to advocate for stronger climate, clean energy and water policies at all levels of government.”<sup>109</sup> Ceres also operates the Business for Innovative Climate and Energy Policy (BICEP) Network which “provides members with the tools and knowledge they need to effectively engage with state and federal policymakers on climate

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<sup>101</sup> *Environmental Law Institute*, INFLUENCEWATCH, <https://perma.cc/ZDQ5-5D7H> (“ELI Information”).

<sup>102</sup> *Id.*; *Welcome to the Environmental Justice Initiative at ELI*, ENV’T L. INST., <https://perma.cc/C6J5-VVY5> (“Environmental Justice at ELI”).

<sup>103</sup> Katelynn Richardson, *Exclusive: House Committee Opens Probe into Climate Activist Group Attempting to ‘influence’ Judges*, THE DAILY CALLER, (Sep. 1, 2025), <https://perma.cc/LFP8-DTTN>.

<sup>104</sup> ELI Information, *supra* n.101; *2021 Annual Report*, ENV’T L. INST. at 19, <https://perma.cc/J6KR-UZ4S> (“ELI 2021 Report”).

<sup>105</sup> ELI Information, *supra* n.101.

<sup>106</sup> APT Report at 15, *supra* n.2.

<sup>107</sup> <https://www.ceres.org/initiatives/climate-action-100>.

<sup>108</sup> *Ceres*, INFLUENCEWATCH, <https://perma.cc/5ZWX-BGWJ> (“Ceres Information”).

<sup>109</sup> *Ceres Investor Network*, CERES, <https://perma.cc/J563-GAJH> (“Ceres Investor Network”).

and energy policies.”<sup>110</sup> Additionally, “[b]etween 2020 through October 2023, Ceres increased the amount it spent on lobbying, from around \$80,000 in 2020 to at least \$270,000 in 2022, an amount which the organization claimed was on track to match or exceed as of the second quarter of 2023.”<sup>111</sup>

#### 11. Rocky Mountain Institute

RMI, founded by activist Amory Lovins in 1982, is a China-linked, U.S.-based nonprofit and think tank that engages in climate policy analysis and advocacy.<sup>112</sup> RMI’s goal is to replace fossil fuel usage with renewable energy sources, though the group also opposes nuclear energy projects.<sup>113</sup> The group also has ties to China through an official partnership with the National Development and Reform Commission, a Chinese government agency.<sup>114</sup> In 2022, RMI published a study claiming that gas stoves are linked to childhood asthma and advocating for a ban on gas stoves.<sup>115</sup> RMI is also linked to billionaire activist donor Fred Stanback and his family, who has been noted as a “proponent of anti-humanist environmentalism . . . the belief that protecting the environment hinges on population control.”<sup>116</sup> RMI’s research is used by RMI and other left-wing climate organizations to push radical environmentalist views in their efforts to influence public opinion and legislation concerning energy policy in the United States.

#### 12. Environmental Defense Fund

Founded in 1966, EDF is a nonprofit environmental activist group whose annual revenues have ballooned to nearly \$250 million in 2023.<sup>117</sup> EDF uses “litigation programming” to advance its extreme left-wing climate agenda, which includes “a federally mandated 20 percent decrease in carbon emissions in less than a decade; a 40-50 percent reduction in methane emissions resulting from natural gas production; and mandated reductions in chemicals that the EDF argues impact human health.”<sup>118</sup> EDF has deep ties to former President Barack Obama, and has pledged to oppose President Donald Trump’s environmental policies.<sup>119</sup> The group has a related lobbying arm in the Environmental

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<sup>110</sup> Ceres Information, *supra* n.108; *Client Profile: Ceres*, OPENSECRETS, <https://perma.cc/T2HT-3MMT> (“Ceres Client Profile”).

<sup>111</sup> Ceres Information, *supra* n.108.

<sup>112</sup> *Rocky Mountain Institute*, INFLUENCEWATCH, <https://perma.cc/6V2U-77ZJ> (“RMI Information”).

<sup>113</sup> *Id.*

<sup>114</sup> Colin Anderson & Joseph Simonsan, *Meet the Green Energy Group Behind the Study That’s Driving Calls To Ban Gas Stoves*, THE WASHINGTON FREE BEACON (Jan. 16, 2023), <https://perma.cc/XE9R-4YL2>.

<sup>115</sup> *Id.*

<sup>116</sup> Ken Braun, ‘Anti-Humanist Environmentalism’ and the Foundation for the Carolinas, CAP. RSCH. CTR. (June 18, 2019), <https://perma.cc/JFR8-8LGA> (internal citations omitted).

<sup>117</sup> *Environmental Defense Fund*, INFLUENCEWATCH, <https://perma.cc/TK5S-EMTV> (“EDF Information”).

<sup>118</sup> *Id.*

<sup>119</sup> Don’t Give Up: Stand Against Trump’s Climate Attacks.” Environmental Defense Fund. Undated. Accessed September 22,

Defense Action Fund, a 501(c)(4) organization.<sup>120</sup> EDF's activities include "lobbying, research, communications, litigation, and providing legal advisory to other organizations."<sup>121</sup> Among the initiatives EDF supports are expanding California's cap and trade program, a federally mandated 30% cut in power-plant emissions, and an approximately 40-50% reduction in methane emissions from natural gas production.<sup>122</sup>

### 13. Institute for Governance and Sustainable Development

IGSD is a radical left-wing climate advocacy organization that supports the Green New Deal and other extreme climate initiatives to "eliminate the use of conventional fuels."<sup>123</sup> In addition to its climate advocacy in the U.S., the group "works with international organizations to promote agreements to combat climate change."<sup>124</sup> Within the U.S., "IGSD targets professionals to push its environmentalist agenda, working with lawyers, political scientists, economists, and scientists," including through establishing "the Program on Governance for Sustainable Development at the University of California-Santa Barbara" to direct research to support environmentalist projects.<sup>125</sup> Additionally, "IGSD has received over \$6.2 million in grants from the U.S. government since 2008."<sup>126</sup> Among its most radical initiatives, since 2017 IGSD has operated the Center for Climate Integrity (CCI). "CCI supports lawsuits against energy companies to push for environmental regulation. CCI works to encourage citizen groups and governments to sue energy companies, billing the lawsuits as necessary to force polluters to pay for the damage of climate change instead of shifting the costs to taxpayers."<sup>127</sup>

### 14. Tides Nexus (Tides Foundation and Tides Center)

The Tides Nexus, a system of related nonprofits founded in 1976 by left-wing activist Drummond Pike, includes the Tides Network, a 501(c)(3) nonprofit headquartered in San Francisco which operates as the controlling organization for the system; the Tides Center, the group's fiscal sponsorship organization; the Tides Foundation, the system's pass through funder and grantmaking organization; and Tides Advocacy, the group's 501(c)(4) entity.<sup>128</sup> In

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2017. [https://secure2.edf.org/site/Advocacy?cmd=display&id=2852&page=UserAction&utm\\_source=twitter&utm\\_campaign=edf\\_content-share\\_upd\\_mem&utm\\_medium=referral&utm\\_id=1478728172&utm\\_content=alert-short](https://secure2.edf.org/site/Advocacy?cmd=display&id=2852&page=UserAction&utm_source=twitter&utm_campaign=edf_content-share_upd_mem&utm_medium=referral&utm_id=1478728172&utm_content=alert-short).

<sup>120</sup> EDF Information, *supra* n.117.

<sup>121</sup> *Id.*

<sup>122</sup> *Id.*

<sup>123</sup> *Institute for Governance and Sustainable Development*, INFLUENCEWATCH, <https://perma.cc/EU4G-MKGW> ("IGSD Information").

<sup>124</sup> *Id.*

<sup>125</sup> *Id.*; *Research & Education*, IGSD (2020), <http://www.igsd.org/about/research-and-education/>.

<sup>126</sup> IGSD Information, *supra* n.123; Robert Stilson, *Green New Deal Supporters Use Taxpayer Dollars*, CAP. RSCH. CTR. (June 21, 2019) <https://perma.cc/2388-YG66>.

<sup>127</sup> IGSD Information, *supra* n.123.

<sup>128</sup> *Tides Nexus*, INFLUENCEWATCH, <https://perma.cc/U2NA-ZFRQ> ("Tides Nexus Information"); *Tides Network*, INFLUENCEWATCH, <https://perma.cc/AM23-V9SE> ("Tides Network Information"); *Tides*

2023 alone, the Tides Nexus—through its associated entities—issued over 4,000 grants and served as fiscal sponsor for over 120 different groups.<sup>129</sup> The Tides Foundation, in addition to receiving millions of dollars in foreign money from groups like CIFF, has been noted as “George Soros’ Favorite Money Handler” when it was discovered that Soro’s Open Society Foundation had given at least \$17.2 million to the Tides Foundation between 2009 and 2022.<sup>130</sup> Additionally, “[t]he Tides Nexus has been described as an organization that ‘washes’ away the paper trail between its grants and the original donor.”<sup>131</sup> Tides founder Drummond Pike reportedly stated, “Anonymity is very important to most of the people we work with.”<sup>132</sup>

## II. FARA

Absent an exemption, an individual or entity must register under FARA if it acts as an “agent” of a “foreign principal” and engages in certain activities that trigger registration. See 22 U.S.C. § 612(a).

### A. Foreign Principal

FARA defines a foreign principal to include “a government of a foreign country and a foreign political party,” as well as a “partnership, association, corporation, organization, or other combination of persons organized under the laws of or having its principal place of business in a foreign country.” *Id.* § 611(b); *see also* 28 C.F.R. 5.100(a)(8). The foreign entities identified in the APT Report all appear to fall within this definition.

**OF.** As a charitable foundation incorporated in Switzerland and seemingly headquartered in Geneva,<sup>133</sup> OF (registered as Oak Philanthropy Ltd) appears to be an “organization” or “combination of persons organized under the laws of” a foreign country with a “principal place of business in a foreign country.” 22 U.S.C. § 611(b)(3). As a result, it qualifies as a foreign principal.

**QCF.** As a U.K.-registered charity with headquarters seemingly in London,<sup>134</sup> QCF appears to be an “organization” or “combination of persons organized under the laws of” a foreign country with a “principal place of business in a foreign country.” 22 U.S.C. § 611(b)(3). As a result, it qualifies as a foreign principal.

**CIFF.** As a U.K.-registered charity seemingly headquartered in London,<sup>135</sup> CIFF appears to be an “organization” or “combination of persons organized under the laws of” a foreign

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*Foundation*, INFLUENCEWATCH, <https://perma.cc/78XK-9CKB>; *Tides Center*, INFLUENCEWATCH, <https://perma.cc/LQ29-AK63>.

<sup>129</sup> Tides Network Information, *supra* n.128.

<sup>130</sup> Carl Horowitz, *The Tides Center: George Soros’ Favorite Money Handler?*, NAT’L LEGAL AND POL’Y CTR. (April 21, 2025) <https://perma.cc/28AR-NNEC>.

<sup>131</sup> Tides Nexus Information, *supra* n.128.

<sup>132</sup> *Charitable Money-Laundering*, CTR. FOR CONSUMER FREEDOM (Mar. 9, 2004), <https://perma.cc/MH6U-N2SJ>.

<sup>133</sup> *Our Values*, OAK FOUND., <https://perma.cc/TA3P-A6CX>.

<sup>134</sup> *About Us*, QUADRATURE CLIMATE FOUND., <https://perma.cc/B3RE-MJZP>.

<sup>135</sup> *About Us*, CHILD’S INV. FOUND., <https://perma.cc/5ZXB-A4DL>. [Contact](#)

country with a “principal place of business in a foreign country.” 22 U.S.C. § 611(b)(3). As a result, it qualifies as a foreign principal.

**KR.** As a charitable foundation incorporated in Denmark and seemingly headquartered in Copenhagen,<sup>136</sup> KR appears to be an “organization” or “combination of persons organized under the laws of” a foreign country with a “principal place of business in a foreign country.” 22 U.S.C. § 611(b)(3). As a result, it qualifies as a foreign principal.

**Laudes.** As a charitable foundation incorporated in Switzerland and seemingly headquartered in Zug,<sup>137</sup> Laudes appears to be an “organization” or “combination of persons organized under the laws of” a foreign country with a “principal place of business in a foreign country.” 22 U.S.C. § 611(b)(3). As a result, it qualifies as a foreign principal.

## **B. Agency Relationships**

“Agent of a foreign principal” is defined to include “[a] any person who acts as an agent, representative, employee, or servant, or [b] any person who acts in any other capacity at the order, request, or under the direction or control, [i] of a foreign principal or [ii] of a person any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign principal” and engages in specified activities. *Id.* § 611(c)(1); *see* 28 C.F.R. § 5.100(b) (defining control “[a]s used in the Act”). Each domestic entity appears to have or have had an agency relationship with a foreign principal.

*1. Each Grantee of the Oak Foundation is an Agent of Oak within the United States.* As outlined above, each of Oak’s grantees has received hundreds of thousands or millions of dollars of grants from Oak<sup>138</sup>, which generally claims that grantees go through a “rigorous due diligence and selection process, which includes extensive discussions, financial reviews, and site visits to ensure the organisations have robust internal processes and controls, a clear strategy, and the capacity to thrive.”<sup>139</sup> Oak also states that “the majority of awards are multi-year in duration,” demonstrating an ongoing relationship between Oak and grantees.<sup>140</sup> Finally, Oak “creates a grant letter to align expectations about the terms of the grant. The letter is reviewed and signed by both Oak and the grantee partner.”<sup>141</sup> Assuming Oak followed its procedures with each grantee identified in the APT report, its requirements and grant-making process are strong evidence of an agency relationship. For example, an October 15, 2021 FARA Advisory Opinion addressing a grant to a domestic nonprofit concluded an agency relationship existed where (1) there was a contract between the parties that “obligated” the requester “to perform specified and detailed obligations for the benefit of [the foreign principal] in order to receive funding,” and (2) the requester, to continue to receive funding, had to provide “detailed narrative reports of its progress in achieving the

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<sup>136</sup> *About Us*, KR FOUND., <https://perma.cc/4Y9M-68GY>.

<sup>137</sup> *Privacy Statement*, LAUDES FOUND., <https://perma.cc/D4XT-L6MA>.

<sup>138</sup> OF claims that the average award is \$900,000 USD. OF Grant-Making Pol’y, *supra* n.9.

<sup>139</sup> *Id.*

<sup>140</sup> *Id.*

<sup>141</sup> OF Grant Application Process at 3, *supra* n.12.



objectives set out in the” parties’ agreement along with “a final narrative report at the completion of the project.”<sup>142</sup> Even if there were not an express agreement—Oak’s policies suggest there is one—an agency relationship may still exist. According to a December 21, 2023 Advisory Opinion from the DOJ FARA Unit to a nonprofit, any mutual understanding as to how a domestic entity can best “support” a foreign principal’s initiatives can potentially give rise to an agency relationship.<sup>143</sup>

2. *Each Grantee of QCF is an Agent of QCF within the United States.* As outlined above, each of QCF’s grantees has received hundreds of thousands or millions of dollars of grants from QCF,<sup>144</sup> and as one would expect when receiving grants for tens or hundreds of millions of dollars, QCF grantees are subject to ongoing QCF monitoring and reporting requirements so that QCF can provide “tailored support” and involvement.<sup>145</sup> Additionally QCF monitors grantees and collects data from their programmes “to assess QCF’s contributions.”<sup>146</sup> According to QCF’s “Impact Framework,” it closely “track[s] the contribution of our programmes to climate solutions that reduce and remove emissions.”<sup>147</sup> QCF collects and monitors data from its partners through a “structured approach to data collection across [its] goals and [its] portfolio.”<sup>148</sup> In part, QCF uses its data collection to “understand how programmes are progressing, so we can provide tailored support.”<sup>149</sup>

Assuming QCF followed its procedures with each grantee identified in the APT report, its requirements and grant-making process are strong evidence of an agency relationship. As stated above, DOJ FARA advisory opinions have found an agency relationship where (1) there was “a contract between the parties” that “obligated” the requester “to perform specified and detailed obligations for the benefit of [the foreign principal] in order to receive funding,” and (2) the requester, to continue to receive funding, had to provide “detailed narrative reports of its progress in achieving the objectives set out in the” parties’ agreement along with “a final narrative report at the completion of the project.”<sup>150</sup> Even if there were not an express agreement—QCF’s policies suggest there is—an agency relationship may still exist. As stated above, according to a December 21, 2023 Advisory Opinion from the DOJ FARA Unit to a nonprofit, any mutual understanding as to how a domestic entity can best “support” a foreign principal’s initiatives can potentially give rise to an agency relationship.<sup>151</sup>

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<sup>142</sup> Advisory Opinion Pursuant to 28 C.F.R. § 5.2 at 2–3 (U.S. Dep’t of Justice Oct. 15, 2021), <https://perma.cc/QU7H-SYCH> (“DOJ Advisory Opinion”).

<sup>143</sup> DOJ, FARA Unit, *Advisory Opinion*, at 6 (Dec. 21, 2023), <https://www.justice.gov/nsdfara/media/1355096/dl?inline>.

<sup>144</sup> APT Report at 21–31, *supra* n.2.

<sup>145</sup> See Section I.A.2., above.

<sup>146</sup> QCF Impact Framework at 3, *supra* n.2.

<sup>147</sup> *Id.* at 2.

<sup>148</sup> *Id.* at 3.

<sup>149</sup> *Id.*

<sup>150</sup> DOJ Advisory Opinion at 3, *supra* n.142.

<sup>151</sup> DOJ, FARA Unit, *Advisory Opinion*, at 6 (Dec. 21, 2023), <https://www.justice.gov/nsdfara/media/1355096/dl?inline>.

3. *Each Grantee of CIFF is an Agent of CIFF within the United States.* As described above and in the December 16, 2025 DOJ Letter, CIFF exercises considerable continuing control and oversight of its grantees, providing strong evidence of an agency relationship under FARA. CIFF describes a rigorous process for selection and oversight of grantees, including “a full programme budget and mapped work plan [] developed by the grantee and the [Foundation] sector teams during the due diligence phase,” and approvals obtained by the Board and/or Programme Investment Committees.<sup>152</sup> Additionally, all grantees must submit “performance reviews” and grant funding is conditioned “upon adherence to the work-plan, budget[s],” “milestones,” and other criteria.<sup>153</sup> This express contracting, as well as ongoing supervision and monitoring of grantees for compliance with CIFF’s goals is strong evidence of agency relationships between CIFF and its grantees.

4. *Each Grantee of KR is an Agent of KR within the United States.* As described above, KR’s terms and conditions for administration of grants imposes “regular reporting requirements” which include a “Narrative Progress Report” and an “Interim Financial Statement.”<sup>154</sup> KR also conditions the release of the final ten percent of the grant amount “upon approval of the grantee’s final reporting.”<sup>155</sup> Additionally, the grant terms provide that “[t]he Foundation reserves the right to demand supervision, research, monitoring and evaluation of the activities using own consultants, who should at any time have unlimited access to all information. The grantee accepts to bear own costs related to presenting information and participating in meetings and in activities relating to such monitoring, research and evaluation activities as may be required by the Foundation.”<sup>156</sup> Such ongoing reporting and supervisory provisions set forth in a detailed grant agreement is strong evidence of an agency relationship.

5. *Each Grantee of Laudes is an Agent of Laudes within the United States.* As described above, Laudes’ grant information page states its requirement that each grantee’s “project aligns with our mission and priorities.”<sup>157</sup> Additionally, under the heading “Start of partnership” Laudes provides “[u]pon approval, we will sign a grant agreement outlining the grant activities, intended outcomes, general terms and conditions as well as the reporting and disbursement schedule.”<sup>158</sup> Laudes also publishes a guide for reporting requirements for grantees described as “Measurement and Evaluation.”<sup>159</sup> This guide describes annual reports and follow-up meetings with a Laudes point of contact for the duration of the grant.<sup>160</sup> These ongoing reporting requirements, express grant agreements and terms, and continued “partnership” with Laudes strongly suggest an agency relationship between Laudes and its U.S.-based grantees.

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<sup>152</sup> CIFF 2024 Annual Report at 40, *supra* n.29.

<sup>153</sup> CIFF 2023 Annual Report at 35, *supra* n.30.

<sup>154</sup> KR Found. Grant Terms at 2, *supra* n.37.

<sup>155</sup> *Id.*

<sup>156</sup> *Id.* at 3.

<sup>157</sup> Laudes Becoming a Partner, *supra* n.44.

<sup>158</sup> *Id.*

<sup>159</sup> Laudes Initiative Requirements at 1, *supra* n.46.

<sup>160</sup> *Id.* at 2.

### C. Registrable Activities

While many activities give rise to the obligation to register under FARA, most relevant here are the activities of engaging in “political activities for or in the interests of [a] foreign principal.” 22 U.S.C. § 611(c)(1)(i), and “solicit[ing], collect[ing], disburse[ing], or dispense[ing] contributions, loans, money, or other things of value for or in the interest of” a foreign principal. *Id.* § 611(c)(1)(iii). Political activities are defined to include “any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or *any section of the public within the United States* with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.” *Id.* § 611(o) (emphasis added).

#### i. ClimateWorks Foundation

*ClimateWorks engages in political activities intended to “influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States.”* 22 U.S.C. § 611(o). ClimateWorks has received large grants to support “the acceleration of electric vehicles” and “financial regulation advocacy to address climate risk.”<sup>161</sup> In addition, ClimateWorks “advances its left-of-center environmentalism through a wide array of projects, international partnerships, and campaigns, including its [] Project Catalyst and its 2021 ‘Drive Electric Campaign’ which seeks to prohibit the new sale of combustion engine vehicles in phases by 2040.”<sup>162</sup> Such campaign and advocacy activities are apparently intended to “influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policy of the United States,” and therefore constitute political activity triggering registration obligations under FARA.

*ClimateWorks “disburses, or dispenses contributions . . . money, or other things of value for or in the interest of [a] foreign principal” within the United States.* 22 U.S.C. § 611(c)(iii). As stated above, ClimateWorks is left-wing pass-through funding entity “that distributes funds from donors to environmentalist advocacy groups around the world.”<sup>163</sup> ClimateWorks aims to combat global warming and cut emissions by “fund[ing] bold climate strategies.”<sup>164</sup> ClimateWorks has received large grants to “support the acceleration of electric vehicles” and “financial regulation advocacy to address climate risk”<sup>165</sup> including a combined over \$344 million from the five foreign organizations identified by the APT Report.<sup>166</sup> ClimateWorks in turn has issued over 2,800 grants totaling over \$2 billion since 2008, including to “Center for American Progress (CAP), CERES, Environmental Defense Fund (EDF), League of Conservation Voters (LCV), New Venture Fund, and

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<sup>161</sup> APT Report at 5, *supra* n.2.

<sup>162</sup> ClimateWorks Information, *supra* n.50; Drive Electric Article, *supra* n.55.

<sup>163</sup> ClimateWorks Information, *supra* n.50.

<sup>164</sup> ClimateWorks Approach, *supra* n.51.

<sup>165</sup> APT Report at 5, *supra* n.2.

<sup>166</sup> *Id.* at 21, 23, 25, 29, 30.

Windward Fund,” operating as a “foreign dark money ATM to fuel other liberal climate advocacy groups.”<sup>167</sup> Many of the groups it funds “lobby for climate-based policies including emissions taxes, restricting coal use, international climate treaties with strict enforcement mechanisms, and diminishing the use of cars.”<sup>168</sup> ClimateWorks’s activities appear to come within the ambit of FARA because they constitute “disburs[ing]” or “dispens[ing] contributions . . . money, or other things of value for or in the interest of [a] foreign principle,”—registrable activity that triggers registration obligations under FARA.

**ii. Grantham Foundation**

***Grantham “disburses, or dispenses contributions . . . money, or other things of value for or in the interest of [a] foreign principal” within the United States.*** 22 U.S.C. § 611(c)(iii). As stated above, Grantham funds a range of climate initiatives from “grassroots efforts to stop the development of coal plants” to funding the “Global Trends in Climate Change” annual report, which tracks climate-related litigation.<sup>169</sup> Grantham provides grants to dozens of left-wing climate organizations that are either pass-through funding organizations themselves or else engage in direct climate and environmental activism and advocacy.<sup>170</sup> As the APT Report shows, Grantham received over \$80 million from QCF to fund its grantmaking activities, money which Grantham “disburses, or dispenses” . . . “in the interest of a foreign principal” within the United States.

**iii. Growald Climate Fund**

***Growald “disburses, or dispenses contributions . . . money, or other things of value for or in the interest of [a] foreign principal” within the United States.*** 22 U.S.C. § 611(c)(iii). As stated above, the Growald Climate Fund distributes grants to fund left-wing “environmentalist causes with a focus on environmentalist energy and the electricity sector.”<sup>171</sup> The Growald Climate Fund has received over \$80 million from QCF which it will presumably use for additional grantmaking for U.S. climate initiatives. Growald uses a “venture philanthropy” model, actively “investing” in early-stage or innovative climate organizations similar to a venture capital fund.<sup>172</sup> Growald’s stated goal is to engage in “high-impact venture philanthropy” to “catalyz[e] the rapid transition to a clean energy future.”<sup>173</sup> Growald’s grantmaking activities using funds it receives from foreign agents apparently constitute “disburs[ing], or dispens[ing] contributions” or “money, or other things of value for or in the interest of [a] foreign principal” within the United States. As such, Growald’s activities likely trigger registration obligations under FARA.

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<sup>167</sup> APT Report at 5, *supra* n.2; ClimateWorks Approach, *supra* n.51.

<sup>168</sup> ClimateWorks Information, *supra* n.50.

<sup>169</sup> APT Report at 5, *supra* n.2.

<sup>170</sup> See Section I.B.2., above.

<sup>171</sup> Growald Climate Fund Information, *supra* n.63.

<sup>172</sup> Growald Climate Fund Approach, *supra* n.64.

<sup>173</sup> *Id.*

**iv. New Venture Fund**

***NVF “disburses, or dispenses contributions . . . money, or other things of value for or in the interest of [a] foreign principal” within the United States.*** 22 U.S.C. § 611(c)(iii). As stated above, NVF acts as a fiscal sponsor to 170 nonprofit projects, many of which engage in lobbying and civic engagement on behalf of left-wing causes.<sup>174</sup> New Venture Fund provides operational support to the projects that operate under its tax-exempt status, as well as serving as an incubator for early-stage or seed-funded initiatives to eventually become operational nonprofits.<sup>175</sup> NVF also administers grants and provides resources to the projects it houses, including climate and sustainability-related groups.<sup>176</sup> NVF’s activities using funds it receives from foreign agents apparently constitute “disburs[ing], or dispens[ing] contributions” or “money, or other things of value for or in the interest of [a] foreign principal” within the United States. As such, NVF’s activities likely trigger registration obligations under FARA.

**v. Windward Fund**

***Windward “disburses, or dispenses contributions . . . money, or other things of value for or in the interest of [a] foreign principal” within the United States.*** 22 U.S.C. § 611(c)(iii). As stated above, Windward Fund is a nonprofit fiscal sponsor part of the Arabella Advisors-managed group of funds.<sup>177</sup> Windward received over \$72 million from the foreign funding groups analyzed in the APT Report.<sup>178</sup> In 2024, “Windward Fund awarded over \$154 million to 337 grantees across 48 states and territories,” distributing the money it received from foreign organizations into the U.S.<sup>179</sup> The Windward Fund operates in conjunction with its “sister” nonprofits, the 501(c)(4) Sixteen Thirty Fund and 501(c)(3) New Venture Fund, which both provide similar funding and fiscal sponsorship services to radical left-wing advocacy organizations.<sup>180</sup> Windward’s activities include “provid[ing] legal compliance, finance, and HR services to its projects, and additionally seek[ing] to help its projects create greater impact through facilitating connections, providing access to information, and capacity building.”<sup>181</sup> Windward’s activities using funds it receives from foreign agents apparently constitute “disburs[ing], or dispens[ing] contributions” or “money, or other things of value for or in the interest of [a] foreign principal” within the United States. As such, Windward’s activities likely trigger registration obligations under FARA.

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<sup>174</sup> APT Report at 13, *supra* n.2.

<sup>175</sup> NVF 2024 Impact Report at 2, 3, 6, *supra* n.71.

<sup>176</sup> *Id.*

<sup>177</sup> APT Report at 5, *supra* n.2.

<sup>178</sup> *Id.* at 24, 28, 31.

<sup>179</sup> McNair, *supra* n.79.

<sup>180</sup> Windward Fund Information, *supra* n.80.

<sup>181</sup> *Id.*

**vi. The Sunrise Project**

***Sunrise Project engages in political activities intended to “influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States.”*** 22 U.S.C. § 611(o). As stated above, the Sunrise Project uses aggressive tactics to bring about the transition from fossil fuels to renewables “as fast as possible.”<sup>182</sup> Among its tactics is coordinating protests against the fossil fuel industry to influence public opinion about U.S. energy policy.<sup>183</sup> Additionally, “the project also runs a specific initiative aimed at cajoling various aspects of [] finance into cutting out traditional energy providers from finance markets and to facilitate weather-dependent energy projects instead. These efforts include targeting and pressuring insurers, asset managers, private banks, central banks, private equity, bond markets, and automakers to shut out the oil and gas industry.”<sup>184</sup> Such campaign and advocacy activities are apparently intended to “influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policy of the United States,” and therefore constitute political activity triggering registration obligations under FARA.

***Sunrise Project “disburses, or dispenses contributions . . . money, or other things of value for or in the interest of [a] foreign principal” within the United States.*** 22 U.S.C. § 611(c)(iii). As stated above, the Sunrise Project “serves as an activist hub, receiving tens of millions of dollars in grants, that it then disburses in accordance with its strategic plan,” which includes “end[ing] the use of traditional energy” and “campaign[ing] to de-bank the oil and gas industry by pressuring the financial sector and various industries to not do business with it.”<sup>185</sup> Of the tens of millions the group receives in grants, it “regrants roughly two-thirds of the funds out” to “organizations that it believes fit into its global change strategy.”<sup>186</sup> Sunrise Project’s activities using funds it receives from foreign agents apparently constitute “disburs[ing], or dispens[ing] contributions” or “money, or other things of value for or in the interest of [a] foreign principal” within the United States. As such, Sunrise Project’s activities likely trigger registration obligations under FARA.

**vii. Rockefeller Philanthropy Advisors**

***RPA engages in political activities intended to “influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States.”*** 22 U.S.C. § 611(o). As stated above, in addition to considerable grantmaking activities, RPA “engages in research, writes papers, and creates coalitions for purposes of guiding donors and foundations,” including “a series of donor guides, addressing issues like gender and climate change.”<sup>187</sup> Such campaign and advocacy activities are apparently intended to “influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policy of

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<sup>182</sup> APT Report at 5, *supra* n.2.

<sup>183</sup> *Id.* at 6.

<sup>184</sup> Sunrise Project Information, *supra* n.85; *Shifting Global Finance Beyond Fossil Fuels*, *supra* n.87.

<sup>185</sup> Sunrise Project Information, *supra* n.85; *About*, *supra* n.85; *Grants*, *supra* n.85.

<sup>186</sup> Sunrise Project Information, *supra* n.85.

<sup>187</sup> RPA Information, *supra* n.90.

the United States,” and therefore constitute political activity triggering registration obligations under FARA.

***RPA “disburses, or dispenses contributions . . . money, or other things of value for or in the interest of [a] foreign principal” within the United States.*** 22 U.S.C. § 611(c)(iii). As stated above, RPA was among the top recipients of funding from Oak Foundation, from whom it received over \$108 million since 2016.<sup>188</sup> RPA issues hundreds of millions of dollars in grants to progressive groups, including over \$400 million in 2023 alone.<sup>189</sup> RPA dispenses contributions it receives from foreign organizations to U.S.-based left-wing groups. Among its largest grants in 2023 were “\$10,247,809 to the Climate Leadership Initiative, \$7,797,805 to Climate Breakthroughs, \$6,633,000 to the Sustainable Markets Foundation, \$5,082,261 to Climate Arc, \$3,910,000 to Oil Change International, \$3,069,696 to the Global Alliance for Incinerator Alternatives, and \$2,853,658 to the World Wildlife Fund.”<sup>190</sup> RPA’s activities using funds it receives from foreign agents apparently constitute “disburs[ing], or dispens[ing] contributions” or “money, or other things of value for or in the interest of [a] foreign principal” within the United States. As such, RPA’s activities likely trigger registration obligations under FARA.

***viii. Center for International Environmental Law***

***CIEL engages in political activities intended to “influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States.”*** 22 U.S.C. § 611(o). As stated above, CIEL accepts foreign grants and uses this money to fund whitepapers and policy research related to extreme climate policies.<sup>191</sup> Among the titles of publications by CIEL are “Accelerating the Managed Decline of Oil and Gas,” “Climate Law, Liability, and Litigation: A New Era in Climate Advocacy,” and “Leveraging Legal and Financial Risk to End Global Reliance on Fossil Fuels.”<sup>192</sup> More recently, in an attempt to aid litigation against traditional energy companies, CIEL published “Smoke and Fumes: The Legal and Evidentiary Basis for Holding Big Oil Accountable for the Climate Crisis.”<sup>193</sup> CIEL’s policy advocacy include “oppos[ition] the use of carbon emitting fuels such as petroleum, coal, and low carbon natural gas.”<sup>194</sup> In addition, “CIEL has also joined coalitions that oppose the use of carbon free nuclear power, produced reports opposing the development of carbon free hydro-electric dams, and opposed the deployment of technologies that would remove carbon emissions from the atmosphere.”<sup>195</sup> In 2023, CIEL co-produced a “report that advocated for the World Bank Group to restrict its energy financing to only ‘renewable’ projects.”<sup>196</sup> CIEL also opposes net-

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<sup>188</sup> APT Report at 12.

<sup>189</sup> *Id.*

<sup>190</sup> RPA Information, *supra* n.90; RPA Data, *supra* n.90.

<sup>191</sup> APT Report at 9.

<sup>192</sup> *Id.*

<sup>193</sup> *Id.*

<sup>194</sup> CIEL Information, *supra* n.92.

<sup>195</sup> *Id.*

<sup>196</sup> *Id.*

zero goals in favor of even more extreme “real zero” goals.<sup>197</sup> CIEL has criticized net zero goals as “hollow” attempts to “mask climate inaction and provide cover for business-as-usual fossil fuel production that spells planetary destruction.”<sup>198</sup> CIEL engages directly in policy advocacy in the U.S. to influence public opinion regarding domestic energy policy. Such campaign and advocacy activities are apparently intended to “influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policy of the United States,” and therefore constitute political activity triggering registration obligations under FARA.

**ix. Environmental Law Institute**

***ELI engages in political activities intended to “influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States.”*** 22 U.S.C. § 611(o). As stated above, ELI runs judicial education programs to teach judges left-wing climate policy and legal theories.<sup>199</sup> The group is also known for teaching and advocating for the “far-left concept of environmental justice.”<sup>200</sup> The group’s Climate Judiciary Project was the subject of a House Judiciary Committee investigation to determine whether the group sought to influence judicial decision-making in climate-related litigation.<sup>201</sup> ELI “develops law and policy, advocates environmentalist policy outcomes to professionals and the public, provides data and analysis, and convenes various groups to address environmental issues.”<sup>202</sup> Additionally, ELI “supports the creation of regulatory rules to address the critical race theory-influenced concept of racial justice, operates the Climate Equity for Local Governments initiative that supports the far-left concept of environmental justice, publishes *The Environmental Law Reporter*, operates an Emerging Leaders Initiative, runs a podcast, and seeks to influence global environmental law and governance practices.”<sup>203</sup> Such campaign and advocacy activities are apparently intended to “influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policy of the United States,” and therefore constitute political activity triggering registration obligations under FARA.

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<sup>197</sup> *Id.*

<sup>198</sup> *Id.*

<sup>199</sup> ELI Information, *supra* n.101.

<sup>200</sup> Environmental Justice at ELI, *supra* n.102; ELI Information, *supra* n.101.

<sup>201</sup> Richardson, *supra* n.103.

<sup>202</sup> ELI Information, *supra* n.101; ELI 2021 Report at 19, *supra* n.104.

<sup>203</sup> ELI Information, *supra* n.101.



**x. Ceres**

***Ceres engages in political activities intended to “influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States.”*** 22 U.S.C. § 611(o). As stated above, Ceres coordinates institutional investors to influence corporate behavior and push the adoption of radical ESG policies in “every aspect of decision-making” and costly climate disclosures for public energy companies.<sup>204</sup> Ceres was a founding partner and driving force behind the Net Zero Asset Managers Initiative and Climate Action 100+, which brought together asset managers from around the world to engage in a coordinated effort to push for ESG policies and emissions disclosures from portfolio companies.<sup>205</sup> Ceres and its related initiatives “leverage[ed] a network of investors totaling more than \$32 trillion in assets to pressure companies into adopting Ceres’ preferred [climate and ESG] policies.”<sup>206</sup> Ceres’ own stated purpose is to “pressure stock exchanges and capital market regulators to improve climate and sustainability risk disclosure, and opportunities to advocate for stronger climate, clean energy and water policies at all levels of government.”<sup>207</sup> Ceres also operates the Business for Innovative Climate and Energy Policy (BICEP) Network which provides members with the tools and knowledge they need “to engage with state and federal policymakers on” climate and energy policies.<sup>208</sup> Additionally, “[b]etween 2020 through October 2023, Ceres increased the amount it spent on lobbying, from around \$80,000 in 2020 to at least \$270,000 in 2022, an amount which the organization claimed was on track to match or exceed as of the second quarter of 2023.”<sup>209</sup> Such campaign and advocacy activities are apparently intended to “influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policy of the United States,” and therefore constitute political activity triggering registration obligations under FARA.

**xi. Rocky Mountain Institute Environmental Defense Fund**

***RMI engages in political activities intended to “influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States.”*** 22 U.S.C. § 611(o). As stated above, RMI engages in climate policy research, analysis, and advocacy.<sup>210</sup> RMI’s goal is to “replace fossil fuel usage” with renewable energy sources, though the group also opposes nuclear energy projects.<sup>211</sup> RMI also has ties to China through an official partnership with the National Development and Reform Commission, a Chinese government agency.<sup>212</sup> As an example of the kinds of policy research and analysis RMI provides, in 2022 RMI published a

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<sup>204</sup> APT Report at 15, *supra* n.2.

<sup>205</sup> <https://www.ceres.org/initiatives/climate-action-100>.

<sup>206</sup> Ceres Information, *supra* n.108.

<sup>207</sup> Ceres Investor Network, *supra* n.109.

<sup>208</sup> *Id.*

<sup>209</sup> Ceres Information, *supra* n.108.

<sup>210</sup> RMI Information, *supra* n.112.

<sup>211</sup> *Id.*

<sup>212</sup> Anderson & Simonsan, *supra* n.114.

study claiming that gas stoves are linked to childhood asthma and advocating for a ban on gas stoves.<sup>213</sup> RMI's research is used by it and other left-wing climate organizations to push radical environmentalist views in their efforts to influence public opinion and legislation concerning energy policy in the United States. Such campaign and advocacy activities are apparently intended to "influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policy of the United States," and therefore constitute political activity triggering registration obligations under FARA.

**xii. Environmental Defense Fund**

*EDF engages in political activities intended to "influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States."* 22 U.S.C. § 611(o). As stated above, EDF's activities include "lobbying, research, communications, litigation, and providing legal advisory to other organizations."<sup>214</sup> Among the initiatives EDF supports are expanding California's cap and trade program, a federally mandated 30% cut in power-plant emissions, and an approximately 40-50% reduction in methane emissions from natural gas production.<sup>215</sup> EDF uses "litigation programming" to advance its extreme left-wing climate agenda, which includes "a federally mandated 20 percent decrease in carbon emissions in less than a decade; a 40-50 percent reduction in methane emissions resulting from natural gas production; and mandated reductions in chemicals that the EDF argues impact human health."<sup>216</sup> EDF also has ties to former President Barack Obama, and has pledged to oppose President Donald Trump's environmental policies.<sup>217</sup> Such campaign and advocacy activities are apparently intended to "influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policy of the United States," and therefore constitute political activity triggering registration obligations under FARA.

**xiii. Institute for Governance and Sustainable Development**

*IGSD engages in political activities intended to "influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States."* 22 U.S.C. § 611(o). As stated above, IGSD is a climate advocacy organization that supports the Green New Deal and other extreme climate initiatives to "eliminate the use of conventional fuels."<sup>218</sup> In addition to its climate advocacy in the U.S., the group "works with international organizations to promote

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<sup>213</sup> *Id.*

<sup>214</sup> EDF Information, *supra* n.117.

<sup>215</sup> *Id.*

<sup>216</sup> *Id.*

<sup>217</sup> Don't Give Up: Stand Against Trump's Climate Attacks." Environmental Defense Fund. Undated. Accessed September 22, 2017. [https://secure2.edf.org/site/Advocacy?cmd=display&id=2852&page=UserAction&utm\\_source=twitter&utm\\_campaign=edf\\_content-share\\_upd\\_mem&utm\\_medium=referral&utm\\_id=1478728172&utm\\_content=alert-short](https://secure2.edf.org/site/Advocacy?cmd=display&id=2852&page=UserAction&utm_source=twitter&utm_campaign=edf_content-share_upd_mem&utm_medium=referral&utm_id=1478728172&utm_content=alert-short).

<sup>218</sup> IGSD Information, *supra* n.123.

agreements to combat climate change.”<sup>219</sup> Within the U.S., “IGSD targets professionals to push its environmentalist agenda, working with lawyers, political scientists, economists, and scientists,” including through establishing “the Program on Governance for Sustainable Development at the University of California-Santa Barbara” to direct research to support environmentalist projects.<sup>220</sup> Additionally, “IGSD has received over \$6.2 million in grants from the U.S. government since 2008.”<sup>221</sup> Among its most radical initiatives, since 2017 IGSD has operated the Center for Climate Integrity (CCI). “CCI supports lawsuits against energy companies to push for environmental regulation. CCI works to encourage citizen groups and governments to sue energy companies, billing the lawsuits as necessary to force polluters to pay for the damage of climate change instead of shifting the costs to taxpayers.”<sup>222</sup> Such campaign and advocacy activities are apparently intended to “influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policy of the United States,” and therefore constitute political activity triggering registration obligations under FARA.

**xiv. Tides Network (and Related Entities)**

***Tides Foundation and Tides Center “disburse[], or dispense[] contributions . . . money, or other things of value for or in the interest of [a] foreign principal” within the United States.*** 22 U.S.C. § 611(c)(iii). As stated above, the Tides Foundation and the Tides Center provide thousands of grants each year and fiscal sponsorship of over 100 different groups. In 2023 alone, the Tides Network—through its associated entities—issued over 4,000 grants and served as fiscal sponsor for over 120 different groups.<sup>223</sup> As the APT Report notes, the two Tides entities, Tides Foundation and Tides Center, received a combined \$10 million from two of the foreign funding organizations analyzed in that report.<sup>224</sup> The Tides Foundation, in addition to receiving millions of dollars in foreign money from groups like CIFF, has been noted as “George Soros’ Favorite Money Handler” when it was discovered that Soros’ Open Society Foundation had given at least \$17.2 million to the Tides Foundation between 2009 and 2022.<sup>225</sup> The Tides Center, which provides fiscal sponsorship in the form of “incubation services” to emerging left-wing groups, allows these groups to accept tax-deductible donations before the groups become independent organizations.<sup>226</sup> This fiscal sponsorship arrangement “has the added effect of obscuring the donors to these individual projects, as grants to incubated organizations are paid to the Tides Center.”<sup>227</sup> Tides’ grantmaking and fiscal sponsorship activities using funds it receives from foreign agents apparently constitute “disburs[ing], or dispens[ing] contributions” or “money, or other things

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<sup>219</sup> *Id.*

<sup>220</sup> *Id.*; “Research & Education”. 2020. IGSD. <http://www.igsd.org/about/research-and-education/>.

<sup>221</sup> IGSD Information, *supra* n.123; Stilson, *supra* n.126.

<sup>222</sup> IGSD Information, *supra* n.123.

<sup>223</sup> Tides Network Information, *supra* n.128.

<sup>224</sup> APT Report at 28, 31, *supra* n.2.

<sup>225</sup> Horowitz, *supra* n.130.

<sup>226</sup> Tides Nexus Information, *supra* n.128.

<sup>227</sup> *Id.*

of value for or in the interest of [a] foreign principal” within the United States. As such, Tides’ activities likely trigger registration obligations under FARA.

### III. Conclusion

For the foregoing reasons, we respectfully submit there is substantial evidence that many of the over 150 U.S.-based organizations that collectively have received nearly \$2 billion from five foreign-registered charities are acting as unregistered agents of foreign principals by engaging in coordinated funding and advocacy efforts to influence U.S. energy policy and undermine American energy independence. Nor does it appear that the nonprofit organizations’ activities would be covered by any of FARA’s exemptions.<sup>228</sup>

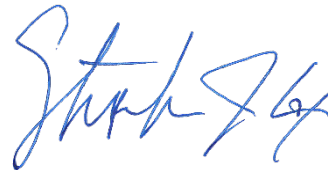
Sincerely,



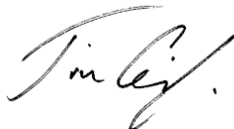
Austin Knudsen  
ATTORNEY GENERAL OF MONTANA



Steve Marshall  
ATTORNEY GENERAL OF ALABAMA



Stephen J. Cox  
ATTORNEY GENERAL OF ALASKA



Tim Griffin  
ATTORNEY GENERAL OF ARKANSAS



James Uthmeier  
ATTORNEY GENERAL OF FLORIDA



Christopher M. Carr  
ATTORNEY GENERAL OF GEORGIA



Raúl Labrador  
ATTORNEY GENERAL OF IDAHO

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<sup>228</sup> “The burden of establishing the availability of an exemption from registration under the Act shall rest upon the person for whose benefit the exemption is claimed.” 28 C.F.R. § 5.300



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