



FARA: A New Era?

Presentation by Baker practitioners
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Disclaimer

This presentation includes citations to the FARA statute and excerpts from FARA advisory opinions issued by the U.S. Department of Justice. Please note that the portions of the statute and advisory opinions contained in this presentation are only excerpts and do not reproduce either the statute or the advisory opinions in their entirety. Therefore, the excerpts contained in this presentation should not be relied on as complete statements of the law or DOJ's positions. Please consult the full text of the law and the full text of the advisory opinions when deciding on a course of action.

This information is not intended as legal advice. This presentation is intended to bring relevant developments to our clients and other interested colleagues. Readers should seek specific legal advice before acting with regard to the subjects noted herein.



Agenda

- 1 FARA in the News

- 2 FARA: Background

- 3 OIG Report, 2016

- 4 The Statute (22 U.S.C. §611)

- 5 §613 Exemptions

- 6 Registration Requirements—The Onerous Ones

- 7 Advisory Opinion Process

- 8 DoJ Investigations

- 9 Future of FARA & Proposed Legislation

- 10 FARA Resources

FARA in the NEWS

REUTERS World Business Markets Politics TV

Detained In Myanmar Energy & Environment Brexit North Korea Charged: The Future of Autos Future of Money



WORLD NEWS NOVEMBER 13, 2017 / 12:37 PM / 7 MONTHS AGO

Russia's RT America registers as 'foreign agent' in U.S.

POLITICS

How the Manafort Indictment Gave Bite to a Toothless Law

The prosecution of Trump's former campaign chairman and his associate Rick Gates could be the most significant prosecution under the Foreign Agents Registration Act ever.

REUTERS World Business Markets Politics TV

Detained In Myanmar Energy & Environment Brexit North Korea Charged: The Future of Autos Future of Money Breakingviews



U.S. MAY 7, 2018 / 5:48 PM / A MONTH AGO

Pakistani pleads guilty; failed to register as U.S. foreign agent

Current Trends



POLITICO

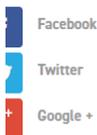
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Justice Department releases FARA advisory opinions

By MARIANNE LEVINE and THEODORIC MEYER | 06/08/2018 02:25 PM EDT

POLITICS

EP

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LAWFARE

The Party's Over for Washington's Foreign Lobbyists

Dozens race to register as foreign lobbyists since start of Mueller inquiry, fearful of Manafort's fate

FARA: Background

- The Foreign Agents Registration Act (FARA) was enacted eighty years ago, in 1938
- It is a disclosure statute that requires persons acting as agents of foreign principals in a political or quasi-political capacity to make periodic public disclosure of their relationship and activities with the foreign principal
- This disclosure allows the U.S. government to evaluate the statements and activities of such persons in light of their function as foreign agents
- The FARA Registration Unit (FARA Unit) of the Counterintelligence and Export Control Section (CES) within the Department's National Security Division (NSD) is responsible for the administration and enforcement of the Act
- A willful failure to register may result in criminal prosecution and a sentence of a fine and up to 5 years in prison

A History

- Pushed through in 1938 by the Franklin D. Roosevelt administration, the FARA was intended to help federal counterespionage authorities identify individuals supporting the Nazi and Communist movements in the U.S.
- A broadly worded statute, it requires anyone promoting the interest of foreign powers in a “political or quasi-political capacity” to disclose the relationship and report regularly on their activities and financing
- During WWII, FARA was used to prosecute 23 criminal cases ([Criminal Resource Manual](#))
- In 1966, after trade with Cuba was prohibited, FARA was amended to require any person engaged in “political activities” as an agent on behalf of a foreign principal to register. This definition is substantially narrower than the original act, which did not require that the activities be “for or on behalf of” the foreign principal ([Criminal Resource Manual](#))
- From 1966 to 2015, the Department only brought seven FARA cases— one resulted in a conviction at trial for conspiracy to violate FARA, two pleaded guilty to violating FARA, two pleaded guilty to non-FARA charges, and two cases were dismissed (OIG Report, 2016)

OIG Report, 2016

Main Findings

- Number of active FARA registrations peaked in 1980s, with a high of 916 active registrations in 1987
- Number of registrations began to fall sharply in mid-1990s with the passage of the Lobbying Disclosure Act (LDA) which carved out a significant exemption in FARA
- Between 1966 and 2015, DoJ only brought seven criminal FARA cases
- 62% of initial registrations were untimely, submitted more than 10 days after the contract's execution
- Only 44% of registered foreign agents submitted supplemental statements within the stipulated 6 months timeframe
- FARA registrants are frequently unresponsive to FARA Unit requests to update their information
- Differing understandings between FBI personnel, prosecutors, and NSD officials about intent of FARA and what constitutes a prosecutable FARA case
 - FBI officials apply 22 U.S.C. §611 or 18 U.S.C. §951 (which governs the treatment of espionage or like behavior)

Shift in enforcement

- “We learned that the focus of the FARA Registration Unit’s enforcement efforts is encouraging voluntary compliance, rather than pursuing criminal or civil charges. Conversely, we found that FBI and USAO staff members with whom we spoke are actively pursuing FARA criminal charges. Although NSD officials disagreed with the assessment offered by these FBI staff members, we believe this disagreement reflects the lack of a comprehensive Department enforcement strategy, and a lack of mutual understanding and clarity in enforcement goals...” (OIG Report)
- “...[T]he majority of FBI field personnel we interviewed believed that NSD’s review of FARA cases was generally slow and that NSD is reluctant to approve FARA charges... We found that NSD does not track the timeliness of its handling of FARA referrals... One person from the FBI [stated] what could be an extraordinarily effective tool has instead become a point of contention and frustration, and found not just a lack of support from NSD, but ‘negative support.’ Some FBI personnel [said they] lacked confidence in FARA because it was too seldom used or too difficult to prosecute.” (OIG Report)
- “[FBI] agents felt that the Department’s reluctance to bring charges in FARA cases resulted in missed opportunities to deter agents of foreign principals from criminal or other misconduct or to obtain valuable cooperation.” (OIG Report)
- “[W]e found that there was not a coordinated strategy on FARA enforcement at the Department and, in particular, there was no strategy addressing how FARA fits into the Department’s overall national security efforts. We therefore recommend that the Department develop a comprehensive strategy for the enforcement and administration of FARA that includes the agencies that perform FARA investigations and prosecutions and integrates with the Department’s overall national security efforts.” (OIG Report)

Recommendations and responses

OIG Recommendations

- Update training for investigators and prosecutors
- Develop enforcement and administration strategies
- Establish a system for tracking FARA cases received for review, including whether cases are approved for criminal or civil action, and the timeline for approval or denial
- Standardize a system sending regular registration delinquency notices with appropriate follow-up
- Expand sources of information to assist in identifying potential or delinquent foreign agents

NSD Responses

- Agree– Commenced efforts to enhance understanding of FARA with presentations to prosecutors and law enforcement partners across the country. Presentations highlight cases suitable for prosecution.
- Agree– Current strategies under reassessment.
- Agree– Developing a new case management system.
- Agree– Expanding on the system to ensure appropriate tracking.
- Agree– Engaged in outreach to other governmental agencies to obtain access to additional information.

High profile cases

Manafort & Gates indictment (Oct. 30, 2017)

- Paul Manafort created DMP International, LLC to engage in work for foreign clients, in particular consulting, lobbying, and public relations for the Government of Ukraine; Richard Gates worked for Manafort
- Party of Regions, a pro-Russian political party in Ukraine, retained Manafort through DMP in 2006
- Between 2006-2015, the two acted as “unregistered agents” doing lobbying work in the U.S. on the party’s behalf
 - Represented Victor Yanukovich, President of Ukraine from 2010-2014, frequently meeting in person
 - Lobbied Members of Congress and staffs about Ukraine sanctions and the validity of Ukrainian elections
- Total of \$75 million in compensation was wired to offshore accounts
- DoJ sent inquiries in 2016 about their activities to which they responded with false and misleading statements

Nisar Chaudhry information (Apr. 19, 2018)

- Pakistani national and U.S. permanent resident, aged 71
- Allegedly worked to influence U.S. officials on foreign policies toward Pakistan from 2012-2018 without disclosing it
- Reported to have “sought to neutralize unfavorable views of Pakistan held by current and former U.S. government officials by employing certain methods of discussion... and/or by controlling and manipulating discussion at the roundtable events he organized or attended”
- DoJ said he misrepresented the activities as educational
- Decisive factors include: meetings with “think tank” scholars and current and former U.S. government officials; regular travel to Pakistan to brief high-level Pakistan public officials on information obtained in the U.S.
- Pled guilty in Maryland district court on May 7, 2018
- Sentencing scheduled for July 2018
- Faces maximum five years in prison, \$10,000 fine and three years of supervised release upon completion of the prison term

The Statute (22 U.S.C. §611)

Who must register?

- “No person shall act as *an agent of a foreign principal* unless he has filed with the Attorney General a true and complete registration statement...”

Terminology:

- *foreign principal* includes—“a government of a foreign country and a foreign political party; a person outside of the United States, unless it is established that such person is an individual and a citizen of and domiciled within the United States..., a partnership, association, corporation, organization... organized under the laws of or having its principal place of business in a foreign country.”

Who can be a foreign principal?

- Foreign parent companies of U.S. subsidiaries
 - [July 9, 2012 opinion](#) where U.S. subsidiary of foreign company ordered to amend registration to disclose relationship with foreign company
- Foreign business partners or foreign affiliates
 - No need for a contract or payment

Who must register?

Terminology

- *agent of a foreign principal* means— “any person who acts as an agent, *representative*, employee, or servant, or any person who acts in any other capacity at the order, request, **or** *under the direction or control*, of a foreign principal **or** *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 who directly or through any other person— *engages* within the United States *in political activities* for or in the interests of such foreign principal, acts within the United States as a *public relations counsel, publicity agent, information-service employee* or *political consultant* for or in the interests of such foreign principal; within the United States solicits, collects, disburses, or dispenses contributions, loans, money, or other things of value for or in the interest of such foreign principal; or within the United States represents the interests of such foreign principal before any agency or official of the Government of the United States; and any person who agrees, consents, assumes or purports to act as, or who is or holds himself out to be, whether or not pursuant to contractual relationship, an agent of a foreign principal ...”
- *agent of a foreign principal*—“does not include any news or press service or association ... so long as it is at least 80 per centum beneficially owned by, and its officers and directors ... are citizens of the United States, and such news or press service ... is not owned, directed, supervised, controlled, subsidized, or financed ... by any foreign principal...”

Agent?

NOT an agent of a foreign principal

- when activities are in furtherance of a mission to support the U.S. ([March 23, 2018 opinion](#))
- when advocacy is humanitarian in nature and solely for the benefit of an incarcerated individual to secure release and homecoming ([Feb. 13, 2018 opinion](#))
- when acting almost exclusively outside the U.S. for duration of employment contract ([Feb. 7, 2018 opinion](#))
- when function is to “advise on social networking tools and methods used by President Obama and other U.S. political candidates to run foreign country election campaign.” Introductions to U.S. government officials to teach about methods used in the U.S. okay ([May 20, 2010 opinion](#))
- when introducing foreign official to private industry leaders ([Dec. 21, 2017](#))

Agent of a foreign principal

- when holding a fundraiser for a dual national (U.S. and other) and individual is a candidate for the Presidency of a foreign country ([Aug. 31, 2015 opinion](#))
- when “1) convening panels of former senior government officials, analysts from think-tanks and educational facilities, knowledgeable corporate figures, and foreign government officials to discuss issues of interest to the foreign government; 2) hosting foreign government officials in Washington to present their views on foreign government issues; 3) training interns and introducing them to the policy community in Washington; 4) working with the foreign government embassy in Washington about important issues; and 5) conducting educational workshops throughout the U.S. on the foreign country’s issues” ([Nov. 8, 2012 opinion](#))
- when promoting economic investments in a foreign jurisdiction. This is an attempt to influence the American public for the benefit of a foreign country ([July 19, 1988 opinion](#))

§613 Exemptions

- (a) Diplomatic or consular officers
- (b) Officials of foreign government
- (c) Staff members of diplomatic or consular officers
- (d) Private and nonpolitical activities; solicitation of funds (“commercial” exemption)
- (e) Religious, scholastic, or scientific pursuits
- (f) Defense of foreign government vital to United States defense
- (g) Persons qualified to practice law
- (h) Agents of foreign principals (“LDA” exemption)

(d) Private and nonpolitical activities; solicitation of funds

- “Commercial” exemption
- “Any person engaging or agreeing to engage only (1) in private and nonpolitical activities in furtherance of the *bona fide* trade or commerce of such foreign principal; or (2) in other activities not serving predominantly a foreign interest; or (3) in the soliciting or collecting of funds and contributions within the United States to be used only for medical aid and assistance, or for food and clothing to relieve human suffering...”
 - Available to state-owned enterprises— “a person engaged in political activities on behalf of a foreign corporation, *even if owned in whole or in part by a foreign government*, will not be serving predominantly a foreign interest where the political activities are directly in furtherance of the bona fide commercial, industrial, or financial operations of the foreign corporation, *so long as* the political activities are not directed by a foreign government or foreign political party and the political activities do not directly promote the public or political interests of a foreign government or of a foreign political party.” (28 CFR §5.304).

(d) Private and nonpolitical activities; solicitation of funds (II)

- [Jan. 20, 1984 opinion](#) (**Obligation to register** when advertising on behalf of foreign government tourist bureau).
- [Oct. 18, 2017 opinion](#) (**No obligation to register** where U.S. company entered into consulting agreement with foreign company to obtain U.S. Customs and Border Protection (“CBP”) cargo pre-inspection at foreign company’s cargo facility in foreign country. To accomplish this goal, U.S. company will engage with officials from CBP and other officials to promote the project. Activities deemed “private” because “do not directly promote the public or political interest of the foreign government” and deal with existing CBP policy).
- [Feb. 9, 2018 opinion](#) (**Obligation to register** where U.S. company retained by foreign state bank to provide: (1) assessment of bank’s cybersecurity programs and policies and programs concerning anti-money laundering and terrorist financing; (2) outreach with officials of U.S. banks, financial institutions, and officials from federal regulatory agencies such as the Federal Reserve Board and the Comptroller of the Currency, including strategic advice; and (3) outreach with financial institutions and federal agencies to familiarize them with foreign state bank’s programs to demonstrate its suitability for establishing commercial relationships with U.S. financial institutions. Activities would directly promote public interests of foreign country).

(e) Religious, scholastic, or scientific pursuits

- “Any person engaging or agreeing to engage only in activities in furtherance of bona fide religious, scholastic, academic, or scientific pursuits or of the fine arts.”
 - Exemption does not apply to persons engaged in “political activities... in the interests of [a] foreign principal” (28 CFR §5.304(d))
- [July 12, 2016 opinion](#) (**Obligation to register** where Foundation considered quasi-government arm of foreign government will be conducting exhibits at museum displaying history of diplomatic relations between U.S. and foreign country’s government with the aim of educating the American public about the strong bond that exists between the two nations. Purpose of the Act is to ensure American public and its lawmakers know the source of information intended to sway U.S. public opinion).

(g) Persons qualified to practice law

- “Any person qualified to practice law, insofar as he engages or agrees to engage in the legal representation of a disclosed foreign principal before any court of law or any agency of the government of the United States: *Provided*, that for the purposes of this subsection legal representation does not include attempts to influence or persuade agency personnel or officials other than in the course of judicial proceedings, criminal or civil law enforcement inquiries, investigations, or proceedings, or agency proceedings required by statute or regulation to be conducted on the record.”
 - Exemption does not apply to “such attempts to influence or persuade 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 or a foreign country or a foreign political party...” (28 CFR §5.306).

(g) Persons qualified to practice law (II)

- [Sept. 10, 2013 opinion](#) (**No obligation to register** where law firm hired to help remove foreign corporation from the Entity List, which prohibits listed foreign persons from receiving exports unless exporter obtains a license because deemed to have acted contrary to U.S. national security and/or U.S. foreign policy interests. Law firm will attempt to remove its client from List through civil law enforcement proceeding).
- [May 3, 2018 opinion](#) (**No obligation to register** where law firm retained by foreign bank to provide legal services in connection with potential designation of foreign bank by OFAC Sanctions Program. Representation limited to “legal services related to any investigation, proceedings, or prosecutions by the DoJ, and/or any other relevant U.S. government agency against the Clients.”)
- [Dec. 10, 2010 opinion](#) (**Obligation to register** where law firm plans to meet with State Department and seek to have officials waive the revenue rule for their foreign government client).

(h) Agents of foreign principals

- “LDA” exemption
- “Any agent of a person ... if the agent has engaged in lobbying activities and has registered under the Lobbying Disclosure Act of 1995 in connection with the agent’s representation of such person or entity.”
 - Exemption does not apply where “a foreign government or foreign political party is the principal beneficiary...” (28 CFR §5.307).
- [Dec. 3, 2012 opinion](#) (**Obligation to register** where law firm seeking to represent foreign firm in navigating the Committee on Foreign Investment in the U.S. (CFIUS) process and educate U.S. policymakers about foreign company’s business operation and proposed acquisition of U.S. company. Lobbying Congress on behalf of foreign company, minority owned by foreign municipal government, is deemed a political activity).
- [Dec. 3, 2012 opinion](#) (**Obligation to register** where law firm seeking to represent foreign bank by : 1) obtaining authorization from the U.S. Treasury Office of Foreign Assets Control (OFAC) for the foreign bank to have a direct relationship with U.S. financial institutions; 2) meeting with members of Congress, U.S. government officials, and federal agency representatives and providing them with informational materials; 3) proposing legislation; and 5) appealing to the public and industry leaders. Activities intend to change domestic or foreign policies of the U.S. and concern the interests of a foreign country – in this instance, Iran).
- [Feb. 29, 2012 opinion](#) (**Obligation to register** where individual married to former leader of foreign political party in exile and retained by spouse to educate U.S. policymakers about prison treatment in attempt to obtain U.S. support in third party release from foreign prison. LDA exemption does not apply because primary beneficiary is a foreign political party, even though a former leader in exile).

Registration Requirements—The Onerous Ones

Title 28 C.F.R. Part 5

- To register, a statement and exhibits must be submitted within 10 days of an agreement to become an agent and must be accompanied with a filing fee of \$305
- Every 6 months after the initial filing, the agent is required to submit supplemental statements for the duration of the principal-agent relationship along with an additional \$305 filing fee for each submission
- Exhibits required at the initial filing (§5.201)
 - Exhibit A— sets forth the information required concerning each foreign principal
 - Exhibit B— sets forth the agreement or understanding between the registrant and the foreign principal as well as the nature and method of performance
 - any change in exhibits A or B shall be reported to the Registration Unit within 10 days of the change
 - Exhibit C— when the registrant is an association, corporation, or organization, it must file:
 - a copy of registrant’s character, articles of incorporation or association, or constitution, or copy of bylaws
 - a copy of every other instrument or document, and a statement of the terms and conditions of every oral agreement relating to the organization, powers and purposes of the registrant
 - Exhibit D—a statement documenting contributions received, loans, money, or other things of value, as part of a fund-raising campaign, for or in the interests of the foreign principal
- Each partner, officer, director, associate, employee, and agent of a registrant is required to file a registration statement (§5.202)
 - Except where these do not engage directly with the registrable activity or the activity is clerical
- Registrant must supply a supplemental statement at 6-month intervals even though he did not engage in any activity in the interest of the foreign principal (§5.202)
- A statement is ‘detailed’ when it “has the degree of specificity necessary to permit meaningful public evaluation of each significant step taken by a registrant to achieve the purposes of the agency relation” (§5.202)

Title 28 C.F.R. Part 5 (II)

- Officials are authorized to inspect books and records
- A registrant must keep and preserve:
 - All correspondance, memoranda, cables, telegrams, teletype messages, and other written communications to and from all foreign principals and all other persons relating to the registrant's activities on behalf of, or in the interest of any of his foreign principals;
 - All correspondance to and from all persons, other than foreign principals, relating to registrant's political activity, or relating to political activity on the part of any of the registrant's foreign principals;
 - Original copies of all written contracts between the registrant and any of his foreign principals;
 - Records containing the names and addresses of persons to whom informational materials have been transmitted;
 - All bookkeeping related to registrant's activities on behalf of foreign principals, including canceled checks, bank statements, and records of income and disbursements, showing names and addresses of all persons who paid moneys to or received moneys from, the registrant, the specific amounts paid or received, and the date on which each item was paid or received;
 - All books and records that disclose names and addresses of employees and agents of the registrant;
 - All material must be kept and preserved for three years after the registrant terminated registration.

Advisory Opinion Process

28 CFR § 5.2 Requirements for a submission

- **Content:** A review request shall be *specific* and contain *in detail* all relevant and material information bearing on the actual activity, course of conduct, expenditure, receipt of money or thing of value, or transaction for which review is requested. There is no prescribed format for the request, but each request must include:
 - (1) The identity(ies) of the agent(s) and foreign principal(s) involved;
 - (2) The nature of the agent's activities for or in the interest of the foreign principal;
 - (3) A copy of the existing or proposed written contract with the foreign principal or a full description of the terms and conditions of each existing or proposed oral agreement; and
 - (4) The applicable statutory or regulatory basis for the exemption or exclusion claimed.
- **Outcome:** NSD may state its present enforcement intention; may decline to state its intention; or may take such other position or initiate such other action as it considers appropriate.
 - Failure to take action after receipt of a review request, documents, or information shall not limit or stop the NSD from taking action.
 - NSD reserves the right to retain any review request, document or information submitted to it and to use any request, document, or information for any governmental purpose.
- [Advisory Opinions](#) published in redacted form

Future of FARA

Pending legislation to revise and update FARA

- Foreign Agents Registration Modernization and Enforcement Act (S. 625 & H.R. 2811)
 - Introduced in the Senate by Sen. Jeanne Shaheen (D-NH) on March 14, 2017, and in the House by Rep. David Cicilline (D-RI) on June 7, 2017
- Foreign Agent Lobbying Transparency Enforcement Act (S. 1679)
 - Introduced in the Senate by Sen. Tammy Duckworth (D-IL) on July 31, 2017
- Disclosing Foreign Influence Act (S. 2039 & H.R. 4170)
 - Introduced in the Senate by Sen. Chuck Grassley (R-IA) and in the House by Rep. Mike Johnson (R-LA) on October 31, 2017
- Transparency in Government Act (H.R. 4504)
 - Introduced in the House by Rep. Mike Quigley (D-IL) on November 30, 2017
- Foreign Agents Registration Amendments Act of 2018 (S. 2482)
 - Introduced in the Senate by Sen. Dianne Feinstein (D-CA) on March 1, 2018
- Foreign Entities Reform Act of 2018 (H.R. 5331)
 - Introduced in the House by Rep. Anna Eshoo (D-CA) on March 19, 2018
- Foreign Influence Transparency Act (S. 2583 & H.R. 5336)
 - Introduced in the Senate by Sen. Marco Rubio (R-FL) on March 21, 2018, and in the House by Rep. Joe Wilson (R-SC) on March 20, 2018

DoJ Investigations

- The FARA Unit reviews a range of publications, websites, and LDA filings for indications of a connection between a potential agent and a foreign principal (OIG Report, 2016)
- The Unit issues a letter of inquiry to the potential registrant advising on FARA requirements. If there is no response, or a false response, the FARA Unit will refer the matter to the FBI
- According to OIG Report, out of 130 letters of inquiry issued between 2006 and 2016, 38 recipients were found to have an obligation to register
- Never ignore a request
- Never provide false information
- Review the statute carefully to determine whether the conduct is not covered or falls within an exception
- Ask for opportunity to make in person presentation

FARA Resources



FARA EFILE FREQUENTLY ASKED QUESTIONS

- Q: What is FARA eFile?
- Q: Is FARA eFile required?
- Q: How do current registrants get started?
- Q: How does a new registrant get started?
- Q: How do current registrants file a FARA Supplemental Statement?
- Q: What document formats does the FARA eFiling system accept?
- Q: Is there a file size limit for attachments?
- Q: What are my payment options?
- Q: What types of documents can be eFiled?
- Q: Do I still need to submit paper copies?
- Q: How do I know if my documents were successfully uploaded to the FARA eFiling system?
- Q: What is the benefit of using the FARA eFiling system?
- Q: Who do I contact for technical problems with the eFiling system or questions regarding the forms?
- Q: Which browsers are supported by FARA eFile and FARA forms?

FARA FORMS

Choose the appropriate form by selecting a link below.
(New Revised Forms Effective May 23, 2017)

Initial Registration Statement	Short-Form Registration Statement
Supplemental Statement	Exhibit A
Amendment to Registration Statement	Exhibit B



Office of the Inspector General
U.S. Department of Justice

Audit of the National Security Division's Enforcement and Administration of the Foreign Agents Registration Act

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