

# Data, Disclosure, and Discrepancies: An Analysis of FARA Reporting and Reform

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## **About the Project**

The Foreign Agents Registration Act was established in 1938 but remains the foremost piece of legislation for tracking and publicizing foreign influence in the U.S. However, there are discrepancies in reporting and enforcement. This report presents the Capstone team's analysis of the literature, patterns, trends, and types of foreign principals and registrants under FARA since 2001.

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## Key Terms

<b>Foreign Agents</b>	An individual, association, or group that acts as an “agent, representative, employee, or servant, under the order, request, direction, or control of a foreign principal.” <sup>1</sup>
<b>Foreign Principals</b>	A foreign government, foreign political party, any person outside the United States (except U.S. citizens who are domiciled within the United States), and any entity organized under the laws of a foreign country or having its principal place of business in a foreign country. <sup>2</sup>
<b>Lobbying</b>	The act of attempting to influence legislation, regulations, or public opinion. <sup>3</sup>
<b>Political Activities</b>	Activities that are a means to influence an agency or U.S. government official through formulating, adopting, or changing domestic or foreign policies or relations of a foreign country or political party. <sup>4</sup>
<b>Political Propaganda</b>	Oral, visual, or written communication aimed at influencing public opinion or actions in the U.S. regarding foreign governments or policies. This also includes messages that encourage violence, civil unrest, or the overthrow of governments within the United States. <sup>5</sup>

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<sup>1</sup> Foreign Agents Registration Act, 22 U.S.C § 611 (c)(1-2).

<sup>2</sup> Foreign Agents Registration Act, 22 U.S.C § 611 (b)(1-3).

<sup>3</sup> Lobbying Disclosure Act, 2 U.S.C § 1602 (7).

<sup>4</sup> Foreign Agents Registration Act, 22 U.S.C § 611 (o).

<sup>5</sup> Harold D. Lasswell, “The Theory of Political Propaganda,” *The American Political Science Review* 21, no. 3 (1927): 627–31, <https://doi.org/10.2307/1945515>.

## Executive Summary

This report provides a comprehensive overview of the Foreign Agents Registration Act (FARA), a U.S. statute enacted in 1938 to identify foreign propaganda within the country. Initially a response to Nazi attempts to disseminate propaganda in the United States, FARA's primary purpose remains to ensure transparency in foreign influence efforts by requiring “foreign agents” representing “foreign principals” to disclose their relationships and activities to the U.S. government. Transparency and accountability enable citizens and policymakers to better understand the motivations behind foreign influence efforts, thereby maintaining the integrity of the U.S. institutions and the democratic process. FARA is the central U.S. law promoting transparency by requiring disclosure of foreign agents’ activities.

Specifically, this analysis seeks to address key questions regarding the effectiveness of FARA enforcement: What patterns emerge in foreign agent registrations and terminations over time? Which countries and entities are most frequently represented? What kinds of activities do foreign agents engage in, and how do these influence U.S. policymaking? What financial trends exist in FARA disclosures, and do they indicate gaps in transparency? By investigating these areas, we aim to provide insights that inform potential policy recommendations for strengthening FARA oversight and compliance.

### *Registration Requirements and Exemptions*

FARA requires those acting as foreign agents to register with the U.S. Department of Justice (DOJ) and submit semi-annual reports on activities and finances, made public through a DOJ database and PDFs of the reports. Exemptions for registration cover recognized diplomats, legal representation in judicial proceedings, religious and academic work, and certain U.S. subsidiaries of foreign companies. Violations—including failure to register, making false statements, or omitting information—can result in civil and criminal penalties, such as fines of up to \$250,000 and imprisonment for up to five years.

Agents representing foreign commercial interests have the option of registering under the less stringent Lobbying Disclosure Act (LDA). The 1995 LDA required those lobbying more than 20% of their time to register with Congress regardless of whether their client was domestic or international.

### *Legislative Evolution*

FARA has undergone significant evolution since 1938. Amendments in 1942 and 1966 addressed definitions and exemptions for registration. Notably, the LDA introduced a potential FARA registration exemption for commercial entities that register under the LDA, creating a dual regulatory standard. In 2007, the Honest Leadership and Open Government Act (HLOGA) mandated electronic filing and a searchable database. More recent legislative proposals reflect

ongoing efforts to modernize the framework in light of digital communication and evolving forms of foreign influence.

FARA remains the primary tool for ensuring transparency around foreign influence in the U.S., with public disclosure requirements bolstering accountability. Additionally, the U.S. model of foreign agent reporting has shaped foreign lobbying laws worldwide. However, modern applications of FARA, particularly involving foreign media, student organizations, and digital platforms, have raised enforcement challenges. The rise of social media and disinformation campaigns complicates the tracking of foreign agents, particularly when they operate outside U.S. jurisdiction. Issues persist around ambiguous exemptions, limited DOJ enforcement, and FARA's reliance on self-reporting. As foreign influence grows more complex, calls for clearer enforcement strategies and updated regulations continue to emerge.

### *Methodology*

The Capstone team analyzed DOJ semi-annual reports from 2001-2021 and FARA eFile bulk data from 1942-2024 to assess trends in foreign agent registrations, activities, and finances under FARA. Much of the analysis focused on the 20-year period where the two data sources overlapped because more detailed data were accessible during that period. Because the data sources were not easily comparable with one another through the DOJ website, the team had to compile the data and translate it into four different data sets—one for all semi-annual data supplemented by the bulk data, and three datasets focusing on bulk data (an annualized version, as well as one for spring and one for fall). All data underwent three rounds of quality control, including a line-by-line comparison of the final data with the original documents to ensure the transfer was accurate.

### *Results*

Since 2001, 2,308 foreign agents have complied with registration requirements. The information those registrants provided indicates that:

- More than 200 countries and or territories were represented by foreign agents.
- The top 10 countries – led by Japan, South Korea, and Saudi Arabia – made up ~31% of all foreign principals.
- Washington, D.C., New York, and Virginia were the most common U.S. states for registered agents to be headquartered.
- Liberia, the Republic of Korea, and Japan were the countries with the most amount of total money exchanged in the 20 years.
- The most common nature of service categories were *Public Relations* and *Lobbying*.
- The most common activities included *Public Relations*, *Government Engagement*, and *Providing Counsel*.

The reporting of the nature of services and activities can create some discrepancies. For example, 86 registrants used the word “lobbying” in their activities, but did not use the category *Lobbying* in their nature of services. Meanwhile, 9,355 registrants reported their nature of service as *Lobbying*, but did not explicitly use the word lobbying in their activities. In the last 20 years, the number of registrants who report *Lobbying* as a nature of service has increased.

From 2001 to 2024, there were 3,789 unique foreign principals. These entities were sorted into industry- and mission-based categories as well as checked for any foreign government affiliation.

- *Administrative Government* contains 49.01%, *Commercial (unspecified)* (14.12%), and *Investment/Development/Wealth* (9.24%).
- Of all the unique foreign principals, 71.07% have some form of government affiliation.
- Government affiliation has fluctuated between 55% and 85% across presidential administrations, but remains relatively consistent with a small decline (and subsequent uptick) in the Trump administration and a decline in the Biden administration.

### *Recommendations*

The Capstone team identified eight recommendations involving FARA's data management, administration, and definitional language. This included to 1) improve the searchability of the FARA bulk database; 2) include all registrant data within the FARA bulk database; 3) improve readability and quality of data; 4) ensure the timeliness of reporting; 5) set continuity standards for FARA bulk data and semi-annual reports; 6) align the reporting processes of LDA and FARA; 7) combine FARA and LDA administration; and 8) clarify ambiguous language with detailed definitions. Enacting these recommendations can allow for an easier and more positive experience using the DOJ data, making all necessary data available in one location, and improving the transparency and effectiveness of FARA data and reporting.

### *Conclusion*

FARA serves an important purpose in promoting transparency regarding foreign influence in the United States. The data points to persistent reporting inconsistencies and ambiguity undermining FARA's transparency goals. These findings can be used to better understand what foreign entities are seeking to influence people or causes within the United States and to identify potential gaps in FARA reporting that may need to be addressed in future legislation. Observed inconsistency within reporting suggests that registrants may be evading certain terms or not reporting certain things at all to avoid public reporting. It is apparent to the team that transparency, as the DOJ interprets it, is not functional, and this analysis demonstrates such. The recommendations provided emphasize the importance of the transparency, readability, and accessibility of FARA reports so that the law fulfills its intended purpose to the fullest extent.

## Introduction

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The Foreign Agents Registration Act (FARA), initially enacted in 1938 in response to concerns over the dissemination of Nazi propaganda in the United States, serves as the country's primary statutory tool for ensuring transparency in foreign influence.<sup>6</sup> FARA requires individuals and entities acting on behalf of foreign principals, known as foreign agents, to register with the U.S. Department of Justice (DOJ) and publicly disclose their activities, finances, contacts, and information regarding their foreign principal.<sup>7</sup> The law does not regulate or prohibit any activities. Rather, it was designed to provide transparency to the public and policymakers as to when and how foreign interests attempt to shape U.S. public opinion or policy.<sup>8</sup>

FARA requires foreign agents to file an initial registration with the DOJ, disclosing important information about their identity, affiliations, contracts, and activities on behalf of foreign principals.<sup>9</sup> In addition to this initial reporting, foreign agents must also periodically update the DOJ on their current activities, finances, contacts, and any changes thereto.

Foreign agents who fail to register under FARA face criminal penalties, including substantial fines and potential imprisonment.<sup>10</sup> FARA has several exemptions, including for religious institutions, diplomatic missions, and academic or scientific pursuits. Moreover, individuals or entities engaged in lobbying efforts can register under the Lobbying Disclosure Act (LDA) and be exempt from registering under FARA, even if they partake in some lobbying efforts on behalf of a foreign entity. This exemption does not exist if the lobbyist's "principal beneficiary" is a foreign entity.<sup>11</sup>

Since 2016, FARA has gained increased attention, as high-profile government officials have been charged with violating FARA at an invigorated rate.<sup>12</sup> As FARA is nearly a century old, legislation has attempted to modernize the language and the operational context of the law. However, modern challenges, such as ambiguity surrounding digital foreign influence and increased globalized markets, still raise concerns about the robustness of FARA. Additionally,

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<sup>6</sup> Foreign Agents Registration Act, 22 U.S.C § 611-621 (1938).

<sup>7</sup> Ibid, § 614-619. and Straus, Jacob R. "Foreign Agents Registration Act (FARA): Background and Issues for Congress." Congressional Research Service, 2020.

<sup>8</sup> Atieh, Jihad. "Foreign Agents: Updating FARA to Protect American Democracy." *University of Pennsylvania Journal of International Law* 31, no. 4 (2010): 1051–88. and Novak, Whitney K. "Foreign Agents Registration Act (FARA): A legal overview." *Congressional Research Service*, 2023. <https://crsreports.congress.gov/product/pdf/IF/IF11439>.<https://crsreports.congress.gov/product/pdf/IF/IF11439>.

<sup>9</sup> Foreign Agents Registration Act, 22 U.S.C § 612

<sup>10</sup> Foreign Agents Registration Act, 22 U.S.C § 618.

<sup>11</sup> Covington and Burling, "The Foreign Agents Registration Act (FARA): A Guide for the Perplexed," January 31, 2023. <https://www.cov.com/en/news-and-insights/insights/2018/01/the-foreign-agents-registration-act-fara>.

<sup>12</sup> Novak, Whitney K. "Foreign Agents Registration Act (FARA): A legal overview." *Congressional Research Service*, 2023. <https://crsreports.congress.gov/product/pdf/IF/IF11439>.

critics point to vague statutory language, inconsistent, limited, or reactive enforcement, and lasting outdated provisions as potential concerns regarding FARA's effectiveness.<sup>13</sup>

## **Purpose of the Report**

This report will use FARA reporting data to evaluate the current limitations of FARA and explore options for strengthening the law's ability to promote transparency and accountability. To achieve this, the Capstone team created and analyzed a comprehensive dataset of FARA registrations and reporting using information from both the initial foreign agent reporting and the periodical updates given to the DOJ and then submitted to Congress. Using this dataset, supplemented by recommendations cited in legal and policy scholarship, the report will provide recommendations to strengthen FARA's ability to fulfill its mission of transparency.

The report begins with a review of relevant literature on FARA, focusing on previous legislative reform efforts, critiques of the law and its implementation, and challenges FARA faces. It then describes the methodology used to create and analyze the FARA data, including how the data were collected, cleaned, and coded for analytical purposes. Individual variables within the dataset, including the nature, location, activities, and finances of foreign agents and their principals, were analyzed individually and across time to identify trends or discrepancies. The Capstone team found that transparency issues and inconsistent reporting, both from the foreign agents to the DOJ and from the DOJ to Congress and the public, substantially hindered FARA's ability to achieve its mission. The report then provides recommendations to remedy the challenges demonstrated by the Capstone team's analysis and corroborated in part by the literature.

## **Background and History of FARA**

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FARA was initially enacted in 1938 to combat Nazi propaganda in the U.S.,<sup>14</sup> with the intent to promote transparency of foreign influence activities<sup>15</sup> rather than prohibit specific activities or content.<sup>16</sup> The DOJ keeps a record of foreign activities and provides information

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<sup>13</sup> Lipinski, Arie. "The Foreign Agents Registration Act Comes to Light amidst Probe into Russian Election Meddling: An Effort to Crack Down on Foreign Lobbyists or a Sign of Corruption," 2017, 35. <https://doi.org/10.2139/ssrn.3132611>. and Straus, Jacob R. "Foreign Agents Registration Act (FARA): Background and Issues for Congress." Congressional Research Service, 2020. and Atieh, Jihad. "Foreign Agents: Updating FARA to Protect American Democracy." University of Pennsylvania Journal of International Law 31, no. 4 (2010): 1051–88. and Lipinski, Arie. "The Foreign Agents Registration Act Comes to Light amidst Probe into Russian Election Meddling: An Effort to Crack Down on Foreign Lobbyists or a Sign of Corruption," 2017, 35. <https://doi.org/10.2139/ssrn.3132611>.

<sup>14</sup> Novak, Whitney K. "Foreign Agents Registration Act (FARA): A legal overview." *Congressional Research Service*, 2023. <https://crsreports.congress.gov/product/pdf/IF/IF11439>.

<sup>15</sup> Ibid., and Straus, Jacob R. "Foreign Agents Registration Act (FARA): Background and Issues for Congress." *Congressional Research Service*, 2020.

<sup>16</sup> Robinson, Nick. "Foreign Agents in an Interconnected World: FARA and the Weaponization of Transparency." *Duke Law Journal* 69 (2019): 1075.

about the activities of foreign agents within the United States. By requiring detailed disclosures, especially regarding “political activities,” FARA aims to shed light on actions that could influence public opinion or policy decisions.<sup>17</sup> The goal is to ensure that foreign influence is visible and therefore does not undermine national interests.<sup>18</sup>

### Registration Requirements

FARA requires any individual or entity acting as an “agent of a foreign principal” to register with the DOJ, no matter how much time, money, or resources are spent on these activities.<sup>19</sup> The registration process is designed to promote transparency by disclosing the nature of the agent’s relationship with the foreign principal and the activities conducted on their behalf.<sup>20</sup> The initial registration must be filed within ten days of entering a relationship with a foreign principal and must include the agent’s name, business address, and a copy of the contract with the foreign principal. Additionally, registrants must submit supplemental statements every six months to update their activities, relationships, and finances.

### Exemptions

FARA's exemptions intend to balance the need for transparency with the protection of legitimate activities that do not threaten national security or public interest.<sup>21</sup> Exemptions apply to diplomatic and consular officers officially recognized by the U.S. government, attorneys representing foreign clients in legal proceedings (as long as their activities are limited to judicial processes), and U.S.-based subsidiaries of foreign companies operating primarily in the U.S. without direct foreign control.<sup>22</sup> Bona fide religious, academic, and scientific activities conducted by foreign entities are also exempt, provided they do not seek to influence U.S. policy or public opinion.<sup>23</sup> While these exemptions serve to protect legitimate activities, they have also created gaps in FARA's coverage, prompting ongoing calls for reform.<sup>24</sup>

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<sup>17</sup> Krishnakumar, Tarun. “Propaganda by Permission: Examining ‘Political Activities’ under the Foreign Agents Registration Act.” *Journal of Legislation* 47, no. 2 (2021): 44–74.

<sup>18</sup> Ibid.

<sup>19</sup> Foreign Agents Registration Act, 22 U.S.C § 612

<sup>20</sup> You, Hye. “Foreign Agents Registration Act: A User’s Guide.” *Interest Groups & Advocacy* 9, no. 3 (2020): 302–16. <https://doi.org/10.1057/s41309-020-00100-1>. and Straus, Jacob R. “The Lobbying Disclosure Act at 20: Analysis and Issues for Congress.” *Congressional Research Service*, 2015

<sup>21</sup> Smith, Zack, Thomas Jipping, and Paul J. Larkin. “Can Congress Limit the Ability of China (or other Foreign Nations) to Lobby US Officials? Statutory and Constitutional Considerations.” *Heritage Foundation Legal Memorandum* 307 (2022).

<sup>22</sup> Foreign Agents Registration Act, 22 U.S.C § 613

<sup>23</sup> Foreign Agents Registration Act, 22 U.S.C § 613

<sup>24</sup> Novak, Whitney K. Foreign agents registration act (FARA): A legal overview, March 9, 2023. <https://crsreports.congress.gov/product/pdf/IF/IF11439>

## Enforcement Mechanisms

FARA enforcement is overseen by the DOJ's FARA Unit, which manages the registration process and monitors compliance with FARA's requirements.<sup>25</sup> Foreign agents are required to submit any informational materials produced on behalf of a foreign principal to the FARA Unit within 48 hours of distribution of the materials in the United States.<sup>26</sup> These materials must clearly state that they are distributed on behalf of a foreign principal, ensuring that recipients are aware of any foreign influence behind the content.<sup>27</sup>

Despite these requirements, critics argue that enforcement of FARA has historically been limited.<sup>28</sup> Until 2015, the DOJ only prosecuted seven cases where FARA violation was the only crime committed.<sup>29</sup> Thus, many individuals who are prosecuted for FARA violations are also being prosecuted for another crime related to their foreign agent activity. Fattal (2018) has also noted inconsistencies in FARA's enforcement, raising concerns about transparency, accountability, and selective enforcement.<sup>30</sup>

FARA enforcement is also challenging due to complex relationships and evolving methods of engagement. The exemption for diplomatic staff serves as an example of this challenge, as this exemption allows foreign governments to engage directly with U.S. policymakers without triggering FARA registration, despite if their activities might be similar to those who are required to register.<sup>31</sup> Moreover, FARA cannot possibly address all modern digital foreign influence efforts, as it is limited to U.S.-based activity. Today's digital influence campaigns, such as foreign propaganda on social media, are often conducted by actors operating from outside the United States.<sup>32</sup> Those behind disinformation campaigns are unlikely to register under the Act, as they typically operate anonymously.<sup>33</sup>

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<sup>25</sup> Ibid.

<sup>26</sup> Straus, Jacob R. "Foreign Agents Registration Act (FARA): Background and Issues for Congress." *Congressional Research Service* (2020).

<sup>27</sup> Draffen, Chris, and Yee-Fui Ng. "Foreign Agent Registration Schemes in Australia and the United States: The Scope, Risks and Limitations of Transparency." *University of New South Wales Law Journal* 43, no. 4 (2020): 1101–36.

<sup>28</sup> Tilles, Jane. "The Lobbying Disclosure Act (LDA) and Its Exemption for Non-Government Foreign Entities." *Workshop on Ethics and Lobbying*. 2020.

<sup>29</sup> Novak, Whitney K. "Foreign Agents Registration Act (FARA): A legal overview." *Congressional Research Service*, 2023.

<sup>30</sup> Fattal, Joshua R. "FARA on Facebook: Modernizing the foreign agents registration act to address propagandists on social media." *New York University Journal of Legislation and Public Policy* 21 (2018): 903. and Krishnakumar, Tarun. "Propaganda by Permission: Examining 'Political Activities' under the Foreign Agents Registration Act." *Journal of Legislation* 47, no. 2 (2021): 44–74.

<sup>31</sup> Robinson, Nick. "Foreign Agents in an Interconnected World: FARA and the Weaponization of Transparency." *Duke LJ* 69 (2019): 1075.

<sup>32</sup> Fattal, Joshua R. "FARA on Facebook: Modernizing the foreign agents registration act to address propagandists on social media." *NYUJ Legis. & Pub. Pol'y* 21 (2018): 903.

<sup>33</sup> Ibid.

## Punitive Measures

FARA includes several punitive measures to deter violations and ensure compliance. Individuals or entities that willfully violate FARA by failing to register, making false statements, or omitting material facts can face civil and criminal penalties. These violations can result in fines ranging from \$5,000 to \$250,000, and in some cases, imprisonment for up to five years.<sup>34</sup>

FARA enforcement has been limited due to the capabilities of proving violations of the law. The U.S. Attorney General can enable the DOJ to compel compliance through court orders when voluntary compliance is insufficient or there is a risk of continued violations. However, securing convictions under FARA can be challenging due to the statutory requirement of proving “willfulness.” This challenge was evident in the case of Gregory Craig in 1945, who was acquitted because prosecutors failed to prove that his statements to DOJ officials were deliberately misleading.<sup>35</sup> Furthermore, the FARA Unit lacks the civil investigative demand, the authority to subpoena information to investigate if a violation of the law has occurred, limiting its ability to compel the production of documents during investigations.<sup>36</sup>

## **Legislative Evolution of FARA**

President Franklin D. Roosevelt signed the original version of FARA into law on June 8, 1938. By requiring public disclosure, FARA sought to prevent covert manipulation of U.S. opinion and policy.<sup>37</sup>

### 1942 Amendment: Expanding Definitions and Administration

In 1942, amid World War II, Congress amended FARA to enhance its enforcement and oversight capabilities.<sup>38</sup> These changes expanded the definitions of foreign principal and foreign agent, transferred administrative authority from the Department of State to the DOJ, and introduced exemptions for bona fide trade, religious, and educational activities, as well as for agents representing countries vital to U.S. defense. Additionally, the amendments required “political propaganda” to be labeled and submitted to both the DOJ and the Library of Congress,

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<sup>34</sup> Foreign Agents Registration Act, 22 U.S.C. § 618(a) and 18 U.S.C. § 3571

<sup>35</sup> McGregor, Shannon C., Bridget Barrett, and Daniel Kreiss. “Questionably Legal: Digital Politics and Foreign Propaganda.” *Journal of Information Technology & Politics* 19, no. 1 (2022): 1–17. <https://doi.org/10.1080/19331681.2021.1902894>.

<sup>36</sup> Draffen, Chris, and Yee-Fui Ng. “Foreign Agent Registration Schemes in Australia and the United States: The Scope, Risks and Limitations of Transparency.” *University of New South Wales Law Journal* 43, no. 4 (2020): 1101–36.

<sup>37</sup> O'Hara, Francis R. “The Foreign Agents Registration Act-The Spotlight Of Pitiless Publicity.” *Villanova Law Review* 10, no. 3 (1965): 435.

<sup>38</sup> Waters, Robert G. “The Foreign Agents Registration Act: How Open Should the Marketplace of Ideas Be.” *Missouri Law Review* 53 (1988): 795.

imposing harsher penalties for noncompliance, including fines and imprisonment for willful violations.<sup>39</sup>

### 1966 Amendment: Propaganda to Advocacy

Following World War II, congressional focus gradually shifted from military conflict to economic competition, leading FARA enforcement to increasingly target foreign lobbying activities related to economic influence.<sup>40</sup> Foreign governments and entities began employing lobbyists to shape U.S. trade policies.

During the Cold War, FARA's focus expanded further to include monitoring communist propaganda from the Soviet Union and its allies.<sup>41</sup> In the 1960s, the definition of "political activities" broadened to include lobbying government officials.<sup>42</sup> The 1966 amendments addressed lobbying and marked a significant shift from propaganda control to managing foreign influence on U.S. government policies.<sup>43</sup> These changes expanded the definitions of "foreign principal" and "agent of a foreign principal,"<sup>44</sup> clarifying that registration was required only when the recipient is subject to the direction or control of a foreign entity.<sup>45</sup> New definitions for "political activities" and "political consultant" were added to capture a broader range of lobbying efforts, including the disclosure of campaign contributions.<sup>46</sup> Finally, the attorney general's enforcement powers were strengthened, allowing penalties for noncompliance. FARA remained unchanged for the next 30 years but still drew attention due to concerns about foreign lobbying.

In the 1980s, foreign lobbying practices had become a significant concern due to Japan's aggressive lobbying efforts in Washington, particularly following the Toshiba scandal.<sup>47</sup> During

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<sup>39</sup> Ibid.

<sup>40</sup> Baker, Mark B. "Updating the Foreign Agents Registration Act to Meet the Current Economic Threat to National Security." *Texas International Law Journal* 25, no. 1 (1990): 23.

<sup>41</sup> Castrovilla, Michael. "The Inherently Political Nature of the Foreign Agents Registration Act: A Statute in Need of Improvement Comments." *National Security Law Journal* 10, no. 2 (2023): 176.

<sup>42</sup> Lipinski, Arie. "The Foreign Agents Registration Act Comes to Light amidst Probe into Russian Election Meddling: An Effort to Crack Down on Foreign Lobbyists or a Sign of Corruption," 2017, 35. <https://doi.org/10.2139/ssrn.3132611>.

<sup>43</sup> Robinson, Nick. "Foreign Agents in an Interconnected World: FARA and the Weaponization of Transparency." *Duke LJ* 69 (2019): 1075. and Fattal, Joshua R. "FARA on Facebook: Modernizing the foreign agents registration act to address propagandists on social media." *New York University Journal of Legislation and Public Policy* 21 (2018): 903.

<sup>44</sup> Lipinski, Arie. "The Foreign Agents Registration Act Comes to Light amidst Probe into Russian Election Meddling: An Effort to Crack Down on Foreign Lobbyists or a Sign of Corruption," 2017, 35. <https://doi.org/10.2139/ssrn.3132611>.

<sup>45</sup> Robinson, Nick. "Foreign Agents in an Interconnected World: FARA and the Weaponization of Transparency." *Duke Law Journal* 69 (2019): 1075.

<sup>46</sup> Ibid and Robinson, Nick. "Foreign Agents in an Interconnected World: FARA and the Weaponization of Transparency." *Duke Law Journal* 69 (2019): 1075.

<sup>47</sup> Schafer, Karlie D. "The Foreign Agents Registration Act in the Age of the Russian Federation: Combating Interference by Russian Media in the United States." *Southwestern Journal of International Law* 25, no. 2 (2019): 447. and Robinson, Nick. "Foreign Agents in an Interconnected World: FARA and the Weaponization of Transparency." *Duke Law Journal* 69 (2019): 1075.

this time, Toshiba Machine Co., a subsidiary of the Japanese conglomerate, sold sensitive technology to the Soviet Union—an act Congress viewed as a national security threat.<sup>48</sup> However, the company avoided FARA registration by exploiting an exemption for U.S.-based subsidiaries of foreign firms. Toshiba was not considered a foreign principal as defined by FARA, as the definition of a foreign principal does not include entities incorporated and having their principal place of business in the United States.<sup>49</sup> This loophole exposed significant gaps in FARA's coverage, allowing foreign-owned entities to evade registration and transparency requirements. Although Congress imposed limited sanctions, the scandal highlighted FARA's limitations in addressing foreign economic influence.

Calls for FARA reform focused on closing broad exemptions and strengthening enforcement.<sup>50</sup> The Heinz Amendments of 1987 aimed to address these issues by clarifying FARA's requirements for foreign-owned subsidiaries, removing the lawyer exemption, and introducing civil penalties.<sup>51</sup> Although these amendments failed to pass, they laid the groundwork for future reforms.

By the 1990s, foreign influence had evolved from overt political manipulation to more subtle forms of economic lobbying.<sup>52</sup> This change exposed FARA's inadequacy in addressing the complexities of modern foreign influence, particularly in the economic sphere.<sup>53</sup> Foreign lobbying had become an economic threat to U.S. national security, with corporations increasingly dependent on foreign financing and less inclined to challenge harmful foreign trade practices.<sup>54</sup> Global economic interdependence amplified the risk, as foreign influence over U.S. trade policy could severely impact American businesses and national security.<sup>55</sup> As a result,

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<sup>48</sup> Schafer, Karlie D. "The Foreign Agents Registration Act in the Age of the Russian Federation: Combating Interference by Russian Media in the United States." *Southwestern Journal of International Law* 25, no. 2 (2019): 447.

<sup>49</sup> Baker, Mark B. "Updating the Foreign Agents Registration Act to Meet the Current Economic Threat to National Security." *Tex. Int'l LJ* 25 (1990): 23.

<sup>50</sup> Straus, Jacob R. "Foreign Agents Registration Act (FARA): Background and Issues for Congress." *Congressional Research Service* (2020).

<sup>51</sup> Atieh, Jihad. "Foreign Agents: Updating FARA to Protect American Democracy." *University of Pennsylvania Journal of International Law* 31, no. 4 (2010): 1051. and Baker, Mark B. "Updating the Foreign Agents Registration Act to Meet the Current Economic Threat to National Security." *Texas International Law Journal* 25, no. 1 (1990): 23.

<sup>52</sup> Novak, Whitney K. "Foreign Agents Registration Act (FARA): A legal overview." *Congressional Research Service*, 2023. <https://crsreports.congress.gov/product/pdf/IF/IF11439>.

<sup>53</sup> Krishnakumar, Tarun. "Propaganda by Permission: Examining 'Political Activities' under the Foreign Agents Registration Act." *Journal of Legislation* 47, no. 2 (2021): 44–74. and Van De Velde, Jacqueline. "The foreign agent problem: An international legal solution to domestic restrictions on non-governmental organizations." *Cardozo L. Rev.* 40 (2018): 687.

<sup>54</sup> Kang, Karam, and Hye Young You. *The value of connections in lobbying*. Working Paper, 2016.

<sup>55</sup> Laufer, Samantha. "A Difference in Approach: Comparing the US Foreign Agents Registration Act with Other Laws Targeting Internationally Funded Civil Society." *International Journal of Not-for-Profit Law* 19, no. 1 (2017): 5.

policymakers began advocating for a broader definition of national security that encompassed economic vulnerabilities created by foreign lobbying.

Prior to 1995, FARA had two goals: monitoring political subversion and reporting on economic lobbying. The latter gained prominence as globalization expanded and concerns about foreign propaganda diminished.<sup>56</sup> The idea that these two objectives should be “bifurcated” into “components addressing political subversion and those addressing economic lobbying,” as described by Mark Baker in 1990, came to fruition in 1995 with the passage of the Lobbying Disclosure Act<sup>57</sup>.

### 1995 Lobbying Disclosure Act (LDA)

The LDA requires “any individual employed or retained by a client for financial or other compensation for services that include more than one lobbying contact,” engaging in lobbying more than twenty percent of the time, to register with the Secretary of the Senate and the Clerk of the House of Representatives to disclose their activities.<sup>58</sup> This legislation utilized registration systems managed by Congress and significantly changed the purpose and usage of FARA itself.<sup>59</sup>

One of the LDA’s most significant effects on FARA is the exemption it provides to entities registered under the LDA. The LDA covers lobbying activities—thus, foreign and domestic entities that register under the LDA are exempt from registering their lobbying activities under FARA.<sup>60</sup> This exemption creates a gap in the registration of foreign entities under FARA and establishes two different regulatory standards for them. According to Straus (2024), corporations are more likely to register under the LDA than under FARA.<sup>61</sup> Majority-owned subsidiaries of foreign multinational corporations represented “nearly 20% of corporate lobbying spending under LDA during 2015-2016.”<sup>62</sup> This amount was almost equivalent to the total spending recorded under FARA during the same period.<sup>63</sup> Covington and Burling (2023) found similar numbers using more recent data, which they interpreted as evidence that at least

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<sup>56</sup> Baker, Mark B. “Updating the Foreign Agents Registration Act to Meet the Current Economic Threat to National Security.” *Texas International Law Journal* 25, no. 1 (1990): 23–42.

<sup>57</sup> *Ibid.*

<sup>58</sup> Lobbying Disclosure Act of 1995, S.1060, 104th Cong. (1995).

<sup>59</sup> “Audit of the National Security Division’s Enforcement and Administration of the Foreign Agents Registration Act.” *Audit. U.S. Department of Justice Office of the Inspector General*, 2016.

<sup>60</sup> *Ibid.*

<sup>61</sup> Straus, Jacob R. “Lobbying from the Outside: Foreign Agents, Lobbyists, and Foreign Advocacy in the USA.” *Interest Groups & Advocacy* (2024) 1-19. 10.1057/s41309-024-00221-x. and Lee, Jieun. “Foreign Lobbying through Domestic Subsidiaries.” *Economics & Politics* 36, no. 1 (2024): 80–103. <https://doi.org/10.1111/ecpo.12232>.

<sup>62</sup> Lee, Jieun. “Foreign Lobbying through Domestic Subsidiaries.” *Economics & Politics* 36, no. 1 (2024): 80–103. <https://doi.org/10.1111/ecpo.12232>.

<sup>63</sup> *Ibid.*

some foreign spending is being filed under the LDA “to circumvent FARA requirements and obfuscate foreign lobbying efforts.”<sup>64</sup>

Additionally, the LDA does not cover agents representing foreign governments or political parties under this exemption. Covington Law Firm states that, even if an agent is engaged in lobbying efforts with a private entity, the exemption is still not available if the agent's “principal beneficiary” is a foreign government or political party.<sup>65</sup> The definition of “principal beneficiary” has never been clearly outlined, but is generally broad in its interpretation.<sup>66</sup> Thus, while the LDA implies that agents must register under FARA if they are involved in a particular degree of lobbying activity on behalf of a foreign government or political party, it is ambiguous and may lead to some foreign lobbying efforts going unaccounted for.

These discrepancies pose significant challenges to transparency, as the regulations and reporting requirements under the LDA are “substantially less” stringent than those under FARA, leading to potential gaps in oversight.<sup>67</sup> Albaugh (2014) states, “FARA is more restrictive than the LDA because of the fear of what agents of foreign entities could do.” In other words, domestic lobbyists are generally perceived as having a vested interest in the nation’s well-being, while foreign agents are assumed to prioritize their own governments’ “self-preservation.”<sup>68</sup> Under the LDA, lobbyists representing interest groups must submit quarterly reports about clients, spending, and lobbying activities. Still, there is no requirement to disclose “specific names of targeted policymakers or the exact dates of lobbying contacts” for LDA.<sup>69</sup> This is in contrast to FARA, where registrants must disclose the names and topics of discussion for all government contacts.<sup>70</sup>

The LDA also provides other criteria. As stated previously, the LDA includes a de minimis rule, which stipulates that individuals must spend a minimum of twenty percent of their time on lobbying efforts before they are required to register under the LDA.<sup>71</sup> FARA, however,

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<sup>64</sup> Courtney, Peter, and Tiffany Lee. “Finding the Other Manaforts: How, and How Much, Foreign Money Is Spent on Lobbying in the United States.” *APSA Preprints*, 2020.

<sup>65</sup> Covington and Burling, “The Foreign Agents Registration Act (FARA): A Guide for the Perplexed,” January 31, 2023. <https://www.cov.com/en/news-and-insights/insights/2018/01/the-foreign-agents-registration-act-fara>.

<sup>66</sup> *Ibid.*

<sup>67</sup> Albaugh, Brittany Morgan. “Two Paths to Preventing Foreign Influence: Reforming Campaign Finance and Lobbying Law Notes and Student Works.” *Journal of International Business and Law* 13, no. 2 (2014): 293., and You, Hye. “Foreign Agents Registration Act: A User’s Guide.” *Interest Groups & Advocacy* 9, no. 3 (2020): 302–16. <https://doi.org/10.1057/s41309-020-00100-1>.

<sup>68</sup> Atieh, Jihad. “Foreign Agents: Updating FARA to Protect American Democracy.” *University of Pennsylvania Journal of International Law* 31, no. 4 (2010): 1051–88.

<sup>69</sup> You, Hye. “Foreign Agents Registration Act: A User’s Guide.” *Interest Groups & Advocacy* 9, no. 3 (2020): 302–16. <https://doi.org/10.1057/s41309-020-00100-1>.

<sup>70</sup> *Ibid.* It is important to note that this information is not included in the FARA downloadable bulk data nor the semi-annual reports to Congress. Information regarding specific contacts and discussion can be found in the Supplemental Materials of the FARA eFile system.

<sup>71</sup> Robinson, Nick. “Foreign Agents in an Interconnected World: FARA and the Weaponization of Transparency.” *Duke Law Journal* 69 (2019): 1075 and Lobbying Disclosure Act of 1995, S.1060, 104th Cong. (1995).

does not have a de minimis rule, and thus any entity that is lobbying on behalf of a foreign entity must register under FARA.<sup>72</sup> Additionally, the 1995 LDA narrowed the scope of FARA’s attorney exemption, allowing only those representing foreign entities in formal court proceedings to be exempt. Although lawmakers designed this to close opportunities for taking ambiguous exemptions, it resulted in attorneys bypassing FARA’s more stringent requirements due to the vague language of “formal court proceedings.”<sup>73</sup>

Since its passage, the LDA has significantly changed the operational context of FARA. The U.S. Department of Justice Office of the Inspector General (DOJ OIG) reported a sharp decline in FARA registrations in the mid-1990s, likely due in part to the exemption carved out in the LDA<sup>74</sup>—with numbers dropping from over 2,000 registrants in 1993 to fewer than 1,500 in 1995.<sup>75</sup> Notably, despite an increase in globalization, FARA registrations peaked in the 1980s, as highlighted in a 2016 DOJ OIG report.<sup>76</sup>

The literature reveals distinct patterns in reporting activities when comparing foreign entities to corporations. While both groups lobby to shape policy outcomes, corporations tend to utilize the LDA, which has more lenient reporting requirements.<sup>77</sup> The case of Dubai Ports World (DPW) demonstrates the potential risk for foreign entities relying on the LDA.<sup>78</sup> In 2006, DPW, a state-owned company from the United Arab Emirates, sought to take control of six major U.S. ports through the acquisition of a British firm. Despite the national security concerns raised by the public and Congress, DPW was able to use the LDA exemption to avoid disclosing detailed information about its lobbying efforts. This controversy underscored the need for stricter oversight under FARA to ensure transparency in cases involving foreign control of critical U.S. infrastructure. While Congress enacted legislative reforms through the Foreign Investment and National Security Act (FINSA) in 2007, these measures failed to address a significant loophole that allowed certain foreign entities to avoid full disclosure requirements.<sup>79</sup>

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<sup>72</sup> Lobbying Disclosure Act of 1995, S.1060, 104th Cong. (1995).

<sup>73</sup> Lipinski, Arie. “The Foreign Agents Registration Act Comes to Light amidst Probe into Russian Election Meddling: An Effort to Crack Down on Foreign Lobbyists or a Sign of Corruption,” 2017, 35. <https://doi.org/10.2139/ssrn.3132611>.

<sup>74</sup> “Audit of the National Security Division’s Enforcement and Administration of the Foreign Agents Registration Act.” *Audit. U.S. Department of Justice Office of the Inspector General*, 2016.

<sup>75</sup> Castrovilla, Michael. “The Inherently Political Nature of the Foreign Agents Registration Act: A Statute in Need of Improvement Comments.” *National Security Law Journal* 10, no. 2 (2023): 176–209.

<sup>76</sup> “Audit of the National Security Division’s Enforcement and Administration of the Foreign Agents Registration Act.” *Audit. U.S. Department of Justice Office of the Inspector General*, 2016.

<sup>77</sup> Lee, Jieun. “Foreign lobbying through domestic subsidiaries.” *Economics & Politics* 36, no. 1 (2024): 80-103. And Atieh, Jihad. “Foreign Agents: Updating FARA to Protect American Democracy.” *University of Pennsylvania Journal of International Law* 31, no. 4 (2010): 1051–88.

<sup>78</sup> Atieh, Jihad. “Foreign Agents: Updating FARA to Protect American Democracy.” *University of Pennsylvania Journal of International Law* 31, no. 4 (2010): 1051–88.

<sup>79</sup> U.S. Congress, *Foreign Investment and National Security Act of 2007*, Public Law 110–49, 110th Cong. (July 26, 2007), <https://www.congress.gov/110/plaws/publ49/PLAW-110publ49.pdf>.

Additionally, separate entities administer FARA and the LDA. The DOJ administers FARA, while the LDA is managed by two different offices within Congress (one for the House and one for the Senate).<sup>80</sup> Critics argue that the problems created by the LDA exemption to FARA could be remedied by either eliminating the exemption or reconciling the two laws to work better together.<sup>81</sup> For example, the Congressional Research Service has called for Congress to consider “combining the administration” of the LDA and FARA.<sup>82</sup> Similarly, research from the American Bar Association recommends that registrants wishing to take the LDA exemption to FARA must check a box acknowledging this in their LDA registration to trigger an “automatic review” of the entity, thus promoting more thorough monitoring.<sup>83</sup> Furthermore, the 2016 DOJ OIG Report recommends that the DOJ formally assess the LDA exemption and “determine whether a formal effort to seek legislative change... on exemptions is warranted.”<sup>84</sup>

### 2007 Amendment: The Honest Leadership and Open Government Act

In response to growing concerns about transparency, Congress passed the Honest Leadership and Open Government Act (HLOGA) in 2007.<sup>85</sup> The amendment was enacted to enhance transparency, ethical conduct, and accountability in the U.S. Congress, particularly concerning lobbying.<sup>86</sup> This legislation emerged in response to a series of lobbying scandals, including the high-profile Jack Abramoff case, which exposed unethical practices such as the exchange of gifts and favors between lobbyists and lawmakers.<sup>87</sup> HLOGA aimed to restore public trust in government by tightening rules on lobbying disclosure, imposing stricter restrictions on gifts and travel funded by lobbyists, and implementing longer breaks before former members of Congress could become lobbyists.<sup>88</sup> Additionally, this amendment mandated the U.S. Attorney General to develop an electronic filing system for FARA registrations and

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<sup>80</sup> Straus, Jacob R. “Foreign Agents Registration Act (FARA): Background and Issues for Congress.” *Congressional Research Service*, 2020.

<sup>81</sup> *Ibid.*

<sup>82</sup> Straus, Jacob R. “The Lobbying Disclosure Act at 20: Analysis and Issues for Congress.” *Congressional Research Service*, 2015

<sup>83</sup> “FARA: Issues and Recommendations for Reform.” *American Bar Association*, 2021.

<sup>84</sup> “Audit of the National Security Division’s Enforcement and Administration of the Foreign Agents Registration Act.” *Audit. U.S. Department of Justice Office of the Inspector General*, 2016.

<sup>85</sup> Atieh, Jihad. “Foreign Agents: Updating FARA to Protect American Democracy.” *University of Pennsylvania Journal of International Law* 31, no. 4 (2010): 1051. and Straus, Jacob R. “The Lobbying Disclosure Act at 20: Analysis and Issues for Congress.” *Congressional Research Service*, 2015

<sup>86</sup> Holman, Craig. “The Tension Between Lobbying and Campaign Finance Laws: Rolling Back Gains Made Under the Honest Leadership and Open Government Act of 2007.” *Election Law Journal: Rules, Politics, and Policy* 13, no. 1 (2014): 45–74.

<sup>87</sup> *Ibid.*

<sup>88</sup> Straus, Jacob R. “Lobbying Registration and Disclosure: Before and After the Enactment of The Honest Leadership and Open Government Act of 2007.” *Congressional Research Service*, 2011.

disclosures, create a publicly accessible, searchable database of FARA filings, and enhance transparency and public oversight of foreign lobbying activities.<sup>89</sup>

### 2025 Developments

On February 5, 2025, U.S. Attorney General Pam Bondi issued a memorandum declaring that “criminal charges under [FARA] shall be limited to instances of alleged conduct similar to more traditional espionage by foreign government actors.”<sup>90</sup> Moreover, this guidance directed the FARA Unit away from prosecutorial actions and towards “civil enforcement, regulatory initiatives, and public guidance.”<sup>91</sup> It is unclear at this time how this guidance has affected registrants’ behavior, FARA Unit operations, or any legislative actions that may be taken by Congress.

## **FARA and Foreign Lobbying Trends**

Foreign lobbying in the United States has evolved significantly, reflecting changes in international relations and domestic policy priorities. Historically, foreign agents have engaged in a variety of activities to influence U.S. policy and decision-making.<sup>92</sup> These activities range from directly lobbying lawmakers to public relations campaigns shaping public opinion. Foreign agents are often hired to address key issues such as foreign aid, trade agreements, and defense policies. According to Straus (2024), countries seeking increased U.S. funding or favorable trade terms are more likely than other countries to hire foreign agents/lobbyists to help them navigate the complex landscape of U.S. politics and advocate for their interests effectively.<sup>93</sup> This trend underscores the strategic importance of lobbying in achieving foreign policy goals.

One common trend in foreign lobbying is targeting influential decision-makers and key lawmakers. Foreign governments and their representatives frequently direct their efforts toward individuals who hold significant sway over policy decisions, including congressional leaders and influential committee chairs.<sup>94</sup> Additionally, think tanks and advocacy groups often serve as intermediaries, providing research and policy recommendations that align with the interests of

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<sup>89</sup> Holman, Craig. “The Tension Between Lobbying and Campaign Finance Laws: Rolling Back Gains Made Under the Honest Leadership and Open Government Act of 2007.” *Election Law Journal: Rules, Politics, and Policy* 13, no. 1 (2014): 45–74.

<sup>90</sup> Office of the Attorney General. *General Policy Regarding Charging, Plea Negotiation, and Sentencing*. February 5, 2025. <https://www.justice.gov/ag/media/1388541/dl?inline>.

<sup>91</sup> *Ibid.*

<sup>92</sup> Krishnakumar, Tarun. “Propaganda by Permission: Examining ‘Political Activities’ under the Foreign Agents Registration Act.” *Journal of Legislation* 47, no. 2 (2021): 44–74.

<sup>93</sup> Straus, Jacob R. “Lobbying from the Outside: Foreign Agents, Lobbyists, and Foreign Advocacy in the USA.” *Interest Groups & Advocacy* (2024) 1-19. 10.1057/s41309-024-00221-x.

<sup>94</sup> Liu, Huchen. “Campaign Contributions and Access to Congressional Offices: Patterns in Foreign Lobbying Data.” *Political Research Quarterly* 75, no. 3 (2022): 812–28. <https://doi.org/10.1177/10659129211029711>.

foreign clients.<sup>95</sup> This dynamic highlights foreign agents' strategic approach to influencing U.S. policy through multiple channels.

Problems related to data collection and reporting have persisted since the 1960s, affecting the accuracy and comprehensiveness of foreign lobbying disclosures. While FARA aims to provide transparency, the complexity of tracking foreign influence through various channels and entities often results in incomplete or inconsistent data.<sup>96</sup> As the landscape of foreign lobbying continues to evolve, addressing these data collection issues will be paramount for enhancing the effectiveness of regulatory measures and ensuring that lobbying activities are conducted transparently and ethically.

## **Challenges of FARA in Modern Use**

FARA's application has changed in the 21st century, and Congress has considered changes to reflect modern concerns. The use of FARA with foreign media outlets, foreign-sponsored student organizations, and digital media has recently become a focus. These potential reforms can be contentious due to First Amendment concerns. Other propositions have included changing the DOJ administration and enforcement of FARA.

### Foreign Media Outlets

Concerns regarding FARA and the growing presence of foreign media outlets have led to debate over whether the law infringes on First Amendment rights.<sup>97</sup> The literature examines the implications of FARA and Congress's decisions related to restrictions on foreign actors and their intersection with the First Amendment.<sup>98</sup> When evaluating the influence of foreign nations or political parties on the U.S. government, it is important to distinguish between foreign entities and U.S. citizens acting on their behalf. Foreign entities do not have the protections of the U.S. Constitution, and U.S. citizens representing foreign principals are subject to registration and disclosure requirements under FARA. However, citizens still retain their constitutional rights, including First Amendment protections. Because of this limitation, foreign principals, who are not U.S. citizens, do not reap the benefits of the First Amendment. Complications arise for lawmakers when U.S. citizens lobby on behalf of foreign governments, as they must ensure that FARA requirements do not infringe upon these citizens' First Amendment rights.<sup>99</sup> Some argue that this guarantee and the First Amendment's freedom of speech provision should allow

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<sup>95</sup> You, Hye. "Foreign Agents Registration Act: A User's Guide." *Interest Groups & Advocacy* 9, no. 3 (2020): 302–16. <https://doi.org/10.1057/s41309-020-00100-1>.

<sup>96</sup> "Audit of the National Security Division's Enforcement and Administration of the Foreign Agents Registration Act." *Audit. U.S. Department of Justice Office of the Inspector General*, 2016.

<sup>97</sup> Brannon, Valerie C., Victoria L. Killion, Whitney K. Novak, and L. Paige Whitaker. "First Amendment Limitations on Disclosure Requirements." *CRS Report*, April 26, 2023.

<sup>98</sup> Smith, Zack, Thomas Jipping, and Paul J. Larkin. "Can Congress Limit the Ability of China (or other Foreign Nations) to Lobby US Officials? Statutory and Constitutional Considerations." *Heritage Foundation Legal Memorandum* 307 (2022).

<sup>99</sup> US Constitution, art. 5

American lobbyists to advocate for foreign governments and interests without needing to register.<sup>100</sup>

The First Amendment has been a significant proponent in cases involving foreign actors and governments relating to FARA. Russian media outlets like Russia Today (RT) have been scrutinized by the U.S. Government.<sup>101</sup> In 2018, the special counsel for FARA identified several Russian disinformation actors, TV Novosti and T&R Productions LLC, the company supplying broadcasting services to RT's U.S. affiliate, leading the DOJ to review RT and the intentions of its political actors.<sup>102</sup> The DOJ ultimately determined that RT's registration did not comply with FARA regulations, stating that "Americans have a right to know who is acting in the United States to influence the U.S. government or public on behalf of foreign principals."<sup>103</sup> That same year, China's Xinhua News Agency was also directed to register under FARA, reflecting a growing concern over foreign influence, particularly concerning RT and the Russian government.<sup>104</sup> These developments have raised questions about applying the First Amendment in the context of foreign agents.

The rise of social media platforms has given foreign agents new avenues to spread their messages to American audiences. RT, in particular, faced criticism for using bots, programs that imitate humans and legitimate users to fulfill an ulterior motive,<sup>105</sup> to spread disinformation on Twitter, exacerbating concerns about propaganda—a key motivation behind the creation of FARA.<sup>106</sup> Concerns about First Amendment protections and foreign agent regulations are likely to grow alongside the proliferation of social media and the ease with which foreign agents can operate without registering, as required by FARA. Despite these concerns, Congress and the DOJ have limited power to restrict foreign actors. Instead, they are tasked with enforcing FARA registration and may consider amending the law to address the challenges posed by the rapid spread of misinformation on social media.

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<sup>100</sup> Ibid.

<sup>101</sup> Persily, Nate, Megan Metzger, and Zachary Kowitz. "Chapter 4: Confronting Efforts at Election Manipulation from Foreign Media Organizations." In *Securing American Elections*, edited by Michael McFaul, 35–42, 2019.

<sup>102</sup> Fattal, Joshua R. "FARA on Facebook: Modernizing the foreign agents registration act to address propagandists on social media." *New York University Journal of Legislation and Public Policy* 21 (2018): 903.

<sup>103</sup> Department of Justice. "Production Company Registers Under the Foreign Agent Registration Act as Agent for the Russian Government Entity Responsible for Broadcasting RT," 2017.  
<https://www.justice.gov/opa/pr/production-company-registers-under-foreign-agent-registration-act-agent-russian-government>.

<sup>104</sup> Ibid.

<sup>105</sup> Office of Cyber and Infrastructure Analysis. "Social Media Bots Overview." *National Protection and Programs Directorate* (2018).

[https://nics.cisa.gov/sites/default/files/documents/pdf/ncsam\\_socialmediabotsoverview\\_508.pdf?trackDocs=ncsam\\_socialmediabotsoverview\\_508.pdf](https://nics.cisa.gov/sites/default/files/documents/pdf/ncsam_socialmediabotsoverview_508.pdf?trackDocs=ncsam_socialmediabotsoverview_508.pdf).

<sup>106</sup> Ibid.

## Foreign-Sponsored Student Organizations

The literature highlights significant challenges in tracking the activities of foreign-sponsored student organizations under FARA, particularly in identifying their connections to foreign principals. FARA requires individuals or entities acting under the direction or control of a foreign principal to register with the DOJ and disclose their activities.<sup>107</sup> However, determining whether a student organization is acting with significant investment from a foreign principal can be complex, especially when the foreign entity is not explicitly listed or when relationships are concealed through intermediaries.<sup>108</sup> This ambiguity complicates enforcement and raises concerns about potential ways for principals to avoid registration in the current framework, leaving gaps in how foreign influence is tracked on U.S. campuses.<sup>109</sup>

Another key issue involves balancing foreign influence concerns with protecting academic freedom. Critics argue that increased oversight of foreign-sponsored organizations may infringe on free speech and academic freedom, particularly when student groups express political views connected to foreign policy. The challenge of distinguishing between legitimate cultural exchange programs and covert foreign influence campaigns is especially pronounced in the case of China, where the lines between the Chinese Communist Party (CCP) and the People's Republic of China (PRC) are often blurred.<sup>110</sup> In response to such concerns, the Foreign Influence Transparency Act (H.R. 1819) proposes amendments to the Higher Education Act of 1965, which would require universities to disclose foreign gifts and contracts. This legislation aims to enhance transparency while raising further questions about how to ensure national security without compromising academic independence.

## Digital Lobbying Activities

In an increasingly online world, the role of FARA in social media foreign influence has come into question. These platforms offer foreign actors new ways to influence both the government and the public, which are more challenging to regulate and enforce.<sup>111</sup>

Social media platforms raise various issues related to FARA, including difficulties in tracking the content's origin, utilizing bots, and evolving tactics. It is often difficult to attribute

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<sup>107</sup> Novak, Whitney K. "Foreign Agents Registration Act (FARA): A legal overview." *Congressional Research Service*, 2023. <https://crsreports.congress.gov/product/pdf/IF/IF11439>.

<sup>108</sup> Covington and Burling, "The Foreign Agents Registration Act (FARA): A Guide for the Perplexed," January 31, 2023. <https://www.cov.com/en/news-and-insights/insights/2018/01/the-foreign-agents-registration-act-fara>.

<sup>109</sup> Greene, Jay, Adam Kissel, and Lindsey Burke. "Protecting American Universities from Undue Foreign Influence." *The Heritage Foundation*. 2024.

<sup>110</sup> Goldstein, Avery. "Explaining Politics in the People's Republic of China: The Structural Alternative." *Comparative Politics* 22, no. 3 (1990): 301-322.

<sup>111</sup> Straus, Jacob R. "The Lobbying Disclosure Act at 20: Analysis and Issues for Congress." *Congressional Research Service*, 2015. and Fattal, Joshua R. "FARA on Facebook: Modernizing the foreign agents registration act to address propagandists on social media." *New York University Journal of Legislation and Public Policy* 21 (2018): 903. and U.S. Congress, House Committee on the Judiciary "Enhancing the Foreign Agents Registration Act of 1938," 2022.

social media content to a particular source.<sup>112</sup> Moreover, enforcement would be challenging; even though the DOJ requires information to be labeled,<sup>113</sup> those who repost foreign materials online purposely or accidentally manipulate the label, and any subsequent viewer wouldn't be aware of the origin of the material. Additionally, unless a post is identified as "promoted," it isn't clear if the agent was compensated for posting or if they are simply sharing a message that they believe in.<sup>114</sup> The final challenge is that if the agent is acting outside of U.S. soil, they would not be required to register or disclose their actions.<sup>115</sup> Congress's approach to amending FARA to account for these complexities will require understanding how FARA is currently used and how the data could best be tracked with agents utilizing social media.

The use of bots by foreign agents can make influence by foreign governments even more complex on the Internet. Bots can be utilized for various purposes in the context of foreign influence. Bots can perform a variety of actions, from spamming messages and reposting foreign-originated content to spreading misinformation or obscuring the identity of the foreign influence.<sup>116</sup> Even if social media companies attempt to restrict bot accounts, they are easily replaced.<sup>117</sup> Additionally, these bots can create a large presence and noise on social media that can disrupt policymakers' goals to hear from their constituents and respond to citizens' desires.<sup>118</sup> It remains unclear how FARA amendments could best address the use of bots. One possible solution is to require all pages or profiles to provide a disclaimer similar to what has been suggested for foreign informational materials.

Potential adaptations to FARA for the 21st century include modifying social media disclosure requirements or prohibiting certain foreign principals from using these platforms for sharing messages, influencing, or lobbying. However, this raises questions about how to determine which foreign principals should be restricted and how to balance enforcement with free speech considerations.<sup>119</sup> The owners of these platforms can take action, as they already

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<sup>112</sup> Fattal, Joshua R. "FARA on Facebook: Modernizing the foreign agents registration act to address propagandists on social media." *New York University Journal of Legislation and Public Policy* 21 (2018): 903.

<sup>113</sup> Foreign Agents Registration Act, 22 U.S.C § 614.

<sup>114</sup> McGregor, Shannon C., Bridget Barrett, and Daniel Kreiss. "Questionably Legal: Digital Politics and Foreign Propaganda." *Journal of Information Technology & Politics* 19, no. 1 (2022): 1–17.

<https://doi.org/10.1080/19331681.2021.1902894>.<https://doi.org/10.1080/19331681.2021.1902894>.

<sup>115</sup> Ibid.

<sup>116</sup> U.S. Department of Justice. "Production Company Registers Under the Foreign Agent Registration Act as Agent for the Russian Government Entity Responsible for Broadcasting RT," 2017.

<https://www.justice.gov/opa/pr/production-company-registers-under-foreign-agent-registration-act-agent-russian-government> and Fattal, Joshua R. "FARA on Facebook: Modernizing the foreign agents registration act to address propagandists on social media." *New York University Journal of Legislation and Public Policy* 21 (2018): 903.

<sup>117</sup> Fattal, Joshua R. "FARA on Facebook: Modernizing the foreign agents registration act to address propagandists on social media." *New York University Journal of Legislation and Public Policy* 21 (2018): 903.

<sup>118</sup> Straus, Jacob R. "Using social media to understand constituent and follower opinions: Impact of "low quality" on US Senator information gathering." *Transforming Government: People, Process and Policy*. 17, no. 2 (2022):219-220.

<sup>119</sup> Persily, Nate, Megan Metzger, and Zachary Krowitz. "Chapter 4: Confronting Efforts at Election Manipulation from Foreign Media Organizations." In *Securing American Elections*, edited by Michael McFaul, 35–42, 2019.

have, through removing or banning certain accounts, but account management cannot be the job of the government.<sup>120</sup> Others argue that the disclosure requirements could be updated to reflect social media and how it is commonly utilized.<sup>121</sup> Part of the complexity of social media and the solutions that lawmakers are considering is that when a way to avoid registration is targeted, another replaces it.<sup>122</sup> Social media is unique and cannot be addressed like other information materials.

### Limiting or Banning Certain Foreign Actors From Hiring Foreign Agents

Ongoing concerns about foreign influence in U.S. politics have sparked debate over restricting certain foreign actors from hiring foreign agents. In the United States, there is a growing public and legislative interest in exploring measures to mitigate the risks posed by foreign influence. This discussion stems from concerns about foreign interference in domestic politics, especially from countries like Russia and China.<sup>123</sup> It underscores the complexity and potential ramifications of implementing such restrictions. As the U.S. considers its approach to this issue, Russian election interference serves as a pertinent example of how expansive foreign agent laws can be used to curtail civil liberties and control public discourse.<sup>124</sup>

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<sup>120</sup> Ibid.

<sup>121</sup> Ibid.

<sup>122</sup> Fattal, Joshua R. "FARA on Facebook: Modernizing the foreign agents registration act to address propagandists on social media." *New York University Journal of Legislation and Public Policy* 21 (2018): 903.

<sup>123</sup> Robinson, Nick. "Foreign Agents in an Interconnected World: FARA and the Weaponization of Transparency." *Duke Law Journal* 69 (2019): 1075.

<sup>124</sup> Ibid.

## Proposed Changes to FARA

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Since its last amendment in 2007, FARA has been the subject of numerous legislative proposals intended to expand its scope, increase enforcement mechanisms, and improve transparency. Across multiple congressional sessions, lawmakers have introduced bills addressing several areas, including who must register under FARA, the DOJ's investigative authority, restrictions on lobbying activities, and improving the public disclosure of foreign influence.

One of the most prevalent trends in proposed FARA-related legislation is the expansion of registration requirements. Several bills have sought to broaden the definition of foreign agents, eliminating exemptions for individuals working on behalf of adversarial nations such as China, Russia, Iran, North Korea, Cuba, and Syria (See Table 1). Other proposals have targeted foreign corporations and state-affiliated media, requiring strict compliance measures before they can engage in U.S. political or journalistic activities (e.g., H.R. 1099, which would mandate foreign media outlets registered under FARA to include disclaimers on content and submit detailed reports on funding sources and activities). Additionally, some bills have focused on eliminating technicalities that allow individuals and entities to avoid FARA registration by filing under LDA instead. Other efforts aim to remove the LDA exemption entirely.

Another consistent legislative theme is strengthening the DOJ's ability to investigate and enforce FARA violations. Multiple bills have proposed granting the attorney general explicit authority to initiate civil investigations, demand additional evidence from registrants, and establish dedicated enforcement units within the DOJ (See Table 1). Several measures have also sought to increase penalties for violations, signaling a broader effort to deter noncompliance and bolster enforcement actions (See Table 1).

Scrutiny of foreign influence in U.S. elections has also been a legislative priority. Some proposed bills have aimed to prohibit political committees from accepting contributions from registered foreign agents (e.g., H.R. 9393), while others have sought to prevent foreign corporations from engaging in political activity altogether (e.g., S. 4666). Similarly, legislators have pushed for heightened disclosure requirements, including mandating that FARA-registered individuals disclose their status before meeting with members of Congress (See Table 1).

Beyond elections, many legislative efforts have targeted lobbying practices and post-government employment. Proposals have included restrictions on former federal officials, members of Congress, and intelligence community leaders from working on behalf of foreign principals after leaving government service (See Table 1). Some bills have extended cooling-off periods, increasing former officials' wait time before engaging in foreign lobbying activities.

Finally, improving the transparency and accessibility of FARA-related information has been a recurring focus. Many legislative proposals have emphasized the need for a more user-friendly, publicly searchable FARA database, with some advocating for a National Foreign Agents Database to centralize and standardize registration information. Other measures have sought to require disclaimers on media and online content produced by foreign agents, ensuring that the public is aware of foreign-sponsored messaging.

Collectively, these legislative trends reflect an ongoing bipartisan concern over foreign influence in U.S. politics, lobbying, and policymaking. Although Congress hasn't enacted a comprehensive overhaul of FARA recently, lawmakers continue to push for stricter oversight, stronger enforcement, and increased transparency in foreign lobbying activities.

Table 1: Bills Proposed Since 2007 Related to FARA

PROPOSAL	DESCRIPTION	LEGISLATION
Expanding Scope of Registration	Expands the scope of who would need to register as a foreign agent.	H.R.9393 (2024), H.R.458 (2023), S.434 (2023), H.R.1099 (2023), H.R.1819 (2023), H.R.4041(2023), S.4901 (2022), H.R.9199 (2022), H.R.7264 (2022), H.R.1535 (2021), S.577 (2021), H.R.7063 (2020), S.3133 (2020), H.R.5733(2020), H.R.6249 (2018), H.R.5336 (2018), S.2583 (2018), S.3123 (2008)
Create and increase investigation authority	Grants authority to the U.S. Department of Justice and U.S. Attorney General.	H.R.8553 (2024), H.R.1419 (2021), S.1724 (2021), H.R.1467 (2019), S.1762 (2019), H.R.4170 (2018), S.2482 (2018), S.625 (2017), H.R. 2811 (2017)
Foreign Agents and US Elections	Increases the scrutiny of the participation of foreign agents in US elections.	H.R.9393 (2024), H.R.4847 (2021), H.R.4736 (2019), H.R.6249 (2018), S.625 (2017), H.R. 2811 (2017)
Foreign Agents and US Office-Holders	Increases the scrutiny of foreign agents and their relationships with current US office-holders.	H.R.8553 (2024), S.1762 (2019), S.3713 (2010), S. 4666
FARA Violation Penalty Increases	Increases the violation penalties for certain FARA violations.	S.1364 (2023), S.1724 (2021), S.1762 (2019), S.625 (2017), S.2039 (2017)
Retroactive Registration of Foreign Agents	Requires retroactive registration of foreign agents.	S.981 (2025), S.2229 (2023), H.R.4545 (2023)
FARA Status Disclosure to Public	Requires foreign agents to disclose their status if interacting with the public such as over media mediums.	S.319 (2021), H.R.337 (2021), S.4207 (2020), H.R.8464 (2020), S.2039 (2017), S.1679 (2017)
FARA and LDA-Exemption	Proposes the closing of the LDA exemption.	H.R.1887 (2025), S.264 (2023), H.R.2811 (2017)

PROPOSAL	DESCRIPTION	LEGISLATION
Creates a FARA Database	Note: FARA currently only requires a database available to the public with search and sort functions only to the technical extent possible.	S.3172 (2021), H.R.5122 (2021), H.R.1566 (2019), H.R.5122 (2019), H.R.4504 (2017), H.R.4679 (2006)
Prohibition of Certain Persons Serving as Foreign Agents	Prohibits political appointees, members of Congress, or flag officers (Generals and Admirals) from serving as or working with a foreign agent.	H.R.8174 (2024), H.R.3389 (2021), H.R.1522 (2019), H.R.6476 (2016), S.3713 (2010)
Prohibition of Former IC Heads Serving as Foreign Agents	Prohibits former IC element heads from serving as foreign agents.	H.R.867 (2019), H.R.4551 (2017)

## Strengths of FARA

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While much of the literature focuses on FARA's limitations and proposed changes, it does have some strengths. One praise of FARA includes that in U.S. policy, FARA remains the foremost piece of legislation for understanding and monitoring the influence of foreign powers in the U.S.<sup>125</sup> FARA effectively targets the information needed to determine the actions and materials that can influence U.S. thinking and actions.<sup>126</sup> Since its 2007 amendment, FARA has enhanced government transparency through the public disclosure of registrant activities and finances.<sup>127</sup> This transparency can increase the trust in the government by the public and can point toward the effectiveness of FARA.<sup>128</sup> Transparency is beneficial not only to increase trust but can decrease the likelihood of corruption, allow the public to be better informed, and increase government accountability.<sup>129</sup> The impact of FARA, both regarding transparency and the desired effects on foreign reporting, can point to its effectiveness as an Act; however, a deeper understanding of the registration and disclosure data can inform this opinion.

Other evidence of the strength of FARA appears in the legislation of other nations.

FARA has influenced foreign lobbying legislation in countries worldwide. The historical desire to protect governments from external influence is not new, and many tactics have been employed to address these concerns. Methods such as requiring government approval to accept international funds and capping the amount of foreign funding allowed have been used previously. Recently, an increasing number of governments have adopted registration legislation they claim is inspired by FARA.<sup>130</sup> While variations in scope, definitions, regulatory intention, and enforcement mechanisms emerge in many examples, comparisons between FARA and the foreign legislations most commonly discussed across the literature provide insights into areas where FARA works effectively.

A notable comparison can be made between FARA and Australia's Foreign Influence Transparency Scheme Act (FITSA). The DOJ was consulted during the drafting of FITSA,

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<sup>125</sup> Public Comment to DOJ Regarding "Clarification and Modernization of Foreign Agents Registration Act (FARA) Implementing Regulations." n.d. *Quincy Institute for Responsible Statecraft*. and Krishnakumar, Tarun. "Propaganda by Permission: Examining 'Political Activities' under the Foreign Agents Registration Act." *Journal of Legislation* 47, no. 2 (2021): 44–74.

<sup>126</sup> Krishnakumar, Tarun. "Propaganda by Permission: Examining 'Political Activities' under the Foreign Agents Registration Act." *Journal of Legislation* 47, no. 2 (2021): 44–74.

<sup>127</sup> Holman, Craig. "The Tension Between Lobbying and Campaign Finance Laws: Rolling Back Gains Made Under the Honest Leadership and Open Government Act of 2007." *Election Law Journal: Rules, Politics, and Policy* 13, no. 1 (2014): 45–74.

<sup>128</sup> Alessandro, Martin, Bruno Cardinale Lagomarsino, Carlos Scartascini, Jorge Streb, and Jerónimo Torrealday. "Transparency and Trust in Government. Evidence from a Survey Experiment." *World Development* 138 (February 2021). <https://doi.org/10.1016/j.worlddev.2020.105223>.

<sup>129</sup> Alt, James E. "Twenty Years of Transparency Research." *Public Sector Economics* 43, no. 1 (March 11, 2019): 5–13. <https://doi.org/10.3326/pse.43.1.2>.

<sup>130</sup> Robinson, Nick. "Foreign Agents in an Interconnected World: FARA and the Weaponization of Transparency." *Duke Law Journal* 69 (2019): 1075.

which FARA significantly influenced.<sup>131</sup> Enacted following concerns about Chinese influence in Australia, FITSA seeks to increase transparency and disclose foreign influence through a registration process.<sup>132</sup> There are many differences between FITSA and FARA, particularly regarding the definitions of parties involved in the lobbying registration process, offered exemptions, and details of the enforcement mechanisms. Nevertheless, the consultation of the DOJ and the use of FARA as a model indicate that FARA is viewed as positive and effective. Additionally, although not directly comparable, comparisons between FITSA and FARA can be used to evaluate the effectiveness of certain exemptions and whether amendments to FARA concerning exemptions would achieve the desired results of lawmakers.

Another significant comparison is between FARA and Russia's Foreign Agent Law (RFAL), which was initially introduced after the 2011 protests surrounding the federal elections in Russia. Although RFAL was initially described as a law crafted in the likeness of FARA, scholars argue that RFAL operates as a tool for the government to suppress dissenting voices.<sup>133</sup> Rebo (2022) notes that the two laws operate differently despite similarities in their construction, suggesting that the aims of FARA and RFAL also differ, in addition to diversions in scope, reporting requirements, and associated stigma.<sup>134</sup> Still, the citing of FARA as inspiration for RFAL suggests that Russia sought to capitalize on FARA's good reputation in its attempt to create a basis for greater state oversight. This arguable misuse and twisting of FARA's strengths indicate that those same strengths were effective in their original context.

The strengths of FARA suggest that it promotes transparency and awareness of foreign influence to a certain extent. The elements required within reporting contribute to an accurate picture of foreign agent activities, and the publishing of FARA documents provides a level of transparency for both government officials and the public. FARA remains one of the most influential pieces of legislation on the issue of foreign influence, a recognition that is widely acknowledged around the world. These strengths, however, do not mean the law is perfect. As indicated by some of the differences in comparable global legislation and other common criticisms, FARA could be further improved through several potential reforms.

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<sup>131</sup> Ibid.

<sup>132</sup> Draffen, Chris, and Yee-Fui Ng. "Foreign Agent Registration Schemes in Australia and the United States: The Scope, Risks and Limitations of Transparency." *University of New South Wales Law Journal* 43, no. 4 (2020): 1101–36.

<sup>133</sup> Rebo, Samuel. "FARA in Focus: What Can Russia's Foreign Agent Law Tell Us about America's?" *Journal of National Security Law and Policy* 12, no. 2 (2022 2021): 277–326. and Human Rights Watch. "Russia's Legislative Minefield: Tripwires for Civil Society since 2020." *Human Rights Watch*, 2024.

<sup>134</sup> Rebo, Samuel. "FARA in Focus: What Can Russia's Foreign Agent Law Tell Us about America's?" *Journal of National Security Law and Policy* 12, no. 2 (2022 2021): 277–326.

## Areas for Improvement as Identified by the Literature

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In 2016, the DOJ OIG issued a report criticizing FARA's broad and vague language, which allows for inconsistent enforcement influenced by the prevailing political climate.<sup>135</sup> The report found that key terms such as "foreign agent," "foreign principal," "control," and "political activities" were ambiguously defined. The report also criticized FARA for creating confusion about who is required to register by covering a wide range of entities such as nonprofits, media organizations, academics, and public officials.<sup>136</sup> Members of Congress<sup>137</sup> and legal scholars<sup>138</sup> have echoed this concern, warning that FARA's lack of clarity enables politically motivated enforcement because it enables the DOJ to selectively enforce the law based on political considerations rather than objective criteria.<sup>139</sup> Scholars further argue that FARA's overly broad scope could lead to the inclusion of individuals and organizations not genuinely under the control of foreign principals, raising concerns that the DOJ might use registration requirements to suppress dissent by labeling certain groups as "foreign agents,"<sup>140</sup> thereby undermining their perceived independence and legitimacy. Further, FARA's broad language makes it susceptible to politicized enforcement, enabling selective application against individuals or groups based on their political stances rather than clear legal violations.<sup>141</sup> In polarized climates, where foreign disinformation blurs the line between domestic and foreign influence, FARA's vague language has led to controversial uses, from targeting activists like W.E.B. Du Bois to investigations of environmental groups and media outlets like RT America.<sup>142</sup>

Since its inception, FARA has faced criticism for weak enforcement, as highlighted by investigations and official reports over the years. The historical lack of spirited enforcement of

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<sup>135</sup> Castrovilla, Michael. "The Inherently Political Nature of the Foreign Agents Registration Act: A Statute in Need of Improvement." *Nat'l Sec. LJ* 10 (2023): 176.

<sup>136</sup> Novak, Whitney K. "Foreign Agents Registration Act (FARA): A legal overview." Congressional Research Service, 2023. <https://crsreports.congress.gov/product/pdf/IF/IF11439>. and Draffen, Chris, and Yee -Fuing Ng. "Foreign agent registration schemes in Australia and the United States: The scope, risks and limitations of transparency." *University of New South Wales Law Journal, The* 43, no. 4 (2020): 1101-1136.

<sup>137</sup> Novak, Whitney K. "Foreign Agents Registration Act (FARA): A legal overview." Congressional Research Service, 2023. <https://crsreports.congress.gov/product/pdf/IF/IF11439>.

<sup>138</sup> Krishnakumar, Tarun. "Propaganda by Permission: Examining "Political Activities" Under the Foreign Agents Registration Act." *J. Legis.* 47 (2021): 44.

<sup>139</sup> Castrovilla, Michael. "The Inherently Political Nature of the Foreign Agents Registration Act: A Statute in Need of Improvement." *Nat'l Sec. LJ* 10 (2023): 176.

<sup>140</sup> Castrovilla, Michael. "The Inherently Political Nature of the Foreign Agents Registration Act: A Statute in Need of Improvement." *Nat'l Sec. LJ* 10 (2023): 176. and Novak, Whitney K. "Foreign Agents Registration Act (FARA): A legal overview." Congressional Research Service, 2023. <https://crsreports.congress.gov/product/pdf/IF/IF11439>.

<sup>141</sup> Rebo, Samuel. "FARA in Focus: What can Russia's Foreign Agent Law tell us about America's?." *J. Nat'l Sec. L. & Pol'y* 12 (2021): 277.

<sup>142</sup> *Ibid.*

FARA<sup>143</sup> has contributed to a steady decline in registrations over time.<sup>144</sup> In a 1980 report, the General Accounting Office (now the Government Accountability Office) described the number of registered agents as merely “the tip of the iceberg,” with only 51% adequately reporting the required information.<sup>145</sup> Historically, the DOJ has prioritized voluntary compliance over prosecution for registration failures,<sup>146</sup> with the FARA Unit’s primary focus being to “encourage voluntary compliance.”<sup>147</sup> As a result, the DOJ prosecuted only seven criminal cases between 1966 and 2015 where FARA was the only crime, although it has brought more than three times that many cases since 2015.<sup>148</sup> Resource constraints may also limit the FARA Unit's ability to investigate fraudulent filings or non-compliance.<sup>149</sup> The 2016 DOJ OIG report on the enforcement and administration of FARA found that the FARA Unit did not have a clear strategy for enforcing FARA.<sup>150</sup> However, the unit operates with a small staff of only eight members, six professional and two administrative, which Draffen and Ng (2020) argue is insufficient given the scope of their responsibilities.<sup>151</sup>

Another significant challenge is the absence of a clear legal mandate for the DOJ. Due to FARA relying on self-reporting, it is difficult for the DOJ to proactively identify violators since the Unit must both prosecute violations and monitor lobbying activities.<sup>152</sup>

Several legal scholars and the FARA Unit<sup>153</sup> have raised concerns about FARA’s broader impact, criticizing the negative connotations tied to the terms “foreign agent” and “propaganda.”<sup>154</sup> The term “foreign agent” carries a stigma, suggesting that the registered

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<sup>143</sup> Atieh, Jahad. "Foreign agents: updating FARA to protect American democracy." *U. Pa. J. Int'l L.* 31 (2009): 1051.

<sup>144</sup> *Ibid.*

<sup>145</sup> Baker, Mark B. "Updating the Foreign Agents Registration Act to Meet the Current Economic Threat to National Security." *Tex. Int'l LJ* 25 (1990): 23.

<sup>146</sup> Novak, Whitney K. "Foreign Agents Registration Act (FARA): A legal overview." Congressional Research Service, 2023. <https://crsreports.congress.gov/product/pdf/IF/IF11439>.

<sup>147</sup> Castrovilla, Michael. "The Inherently Political Nature of the Foreign Agents Registration Act: A Statute in Need of Improvement." *Nat'l Sec. LJ* 10 (2023): 176.

<sup>148</sup> Novak, Whitney K. "Foreign Agents Registration Act (FARA): A legal overview." *Congressional Research Service*, 2023. <https://crsreports.congress.gov/product/pdf/IF/IF11439>.

<sup>149</sup> Atieh, Jahad. "Foreign agents: updating FARA to protect American democracy." *U. Pa. J. Int'l L.* 31 (2009): 1051.

<sup>150</sup> U.S. Dept. of Justice Office of the Inspector Gen., Audit of the Nat'l SEC. Div.'s Enf't and Admin. of the Foreign Agents Registration Act, (2016) <https://oig.justice.gov/reports/2016/a1624.pdf>.

<sup>151</sup> Draffen, Chris, and Yee-Fuing Ng. "Foreign agent registration schemes in Australia and the United States: The scope, risks and limitations of transparency." *University of New South Wales Law Journal*, The 43, no. 4 (2020): 1101-1136

<sup>152</sup> Atieh, Jahad. "Foreign agents: updating FARA to protect American democracy." *U. Pa. J. Int'l L.* 31 (2009): 1051.

<sup>153</sup> Robinson, Nick. "Foreign Agents in an Interconnected World: FARA and the Weaponization of Transparency." *Duke LJ* 69 (2019): 1075. and Wark, Wesley. *How allies do it: Five Eyes foreign influence transparency registries*. Centre for International Governance Innovation, 2024.

<sup>154</sup> Baker, Mark B. "Updating the Foreign Agents Registration Act to Meet the Current Economic Threat to National Security." *Tex. Int'l LJ* 25 (1990): 23.

individual or organization lacks independence and operates under foreign influence, an often oversimplified or misleading characterization.<sup>155</sup> Additionally, the perception of “foreign influence” can suppress government criticism from civil society organizations, disproportionately affecting those with fewer resources.<sup>156</sup> Although the term “political propaganda” has been replaced with “informational materials,” the original connotation persists, reinforcing the perception that foreign agents are subversive or disloyal.<sup>157</sup>

Some experts<sup>158</sup> have highlighted a critical flaw in FARA’s implementation: inadequate disclosure. Filings are often vague, incomplete, or inaccurate, undermining FARA’s intended transparency.<sup>159</sup> Although FARA aims to ensure that agents of foreign principals disclose their activities, the quality of these disclosures often falls short, limiting meaningful public scrutiny.<sup>160</sup> Because FARA relies on comprehensive and accurate filings to inform stakeholders about foreign influence, these deficiencies weaken its effectiveness. With consistently inadequate filings, DOJ scrutiny remains low, and remedial measures are minimal, raising serious concerns about FARA’s enforcement effectiveness.

Scholars argue that broad exemptions, especially through the LDA, weaken FARA’s effectiveness. Foreign agents may avoid FARA’s stricter rules and register under the more relaxed LDA instead, making foreign lobbying less transparent.<sup>161</sup> Moreover, exemptions for activities “not serving predominantly a foreign interest” and the exclusion of domestic subsidiaries of foreign corporations provide opportunities to evade registration.<sup>162</sup> Some attorney exemptions have been clarified to apply to only formal judicial and on-the-record agency proceedings, reducing opportunities for exemption when a context would require registration.<sup>163</sup> Nonetheless, lawyers representing foreign principals in court continue to be exempt from registration. Additionally, FARA does not regulate lobbying contacts made outside the U.S.,

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<sup>155</sup> Robinson, Nick. "Foreign Agents in an Interconnected World: FARA and the Weaponization of Transparency." *Duke LJ* 69 (2019): 1075

<sup>156</sup> Draffen, Chris, and Yee-Fuing Ng. "Foreign agent registration schemes in Australia and the United States: The scope, risks and limitations of transparency." *University of New South Wales Law Journal, The* 43, no. 4 (2020): 1101-1136

<sup>157</sup> Baker, Mark B. "Updating the Foreign Agents Registration Act to Meet the Current Economic Threat to National Security." *Tex. Int'l LJ* 25 (1990): 23.

<sup>158</sup> *Ibid.*

<sup>159</sup> Krishnakumar, Tarun. "Propaganda by Permission: Examining "Political Activities" Under the Foreign Agents Registration Act." *J. Legis.* 47 (2021): 44.

<sup>160</sup> *Ibid.*

<sup>161</sup> Smith, Zack, Thomas Jipping, and Paul J. Larkin. "Can Congress Limit the Ability of China (or other Foreign Nations) to Lobby US Officials? Statutory and Constitutional Considerations." *Heritage Foundation Legal Memorandum* 307 (2022).

<sup>162</sup> Atieh, Jahad. "Foreign agents: updating FARA to protect American democracy." *U. Pa. J. Int'l L.* 31 (2009): 1051.

<sup>163</sup> Atieh, Jahad. "Foreign agents: updating FARA to protect American democracy." *U. Pa. J. Int'l L.* 31 (2009): 1051. And Smith, Zack, Thomas Jipping, and Paul J. Larkin. "Can Congress Limit the Ability of China (or other Foreign Nations) to Lobby US Officials? Statutory and Constitutional Considerations." *Heritage Foundation Legal Memorandum* 307 (2022).

further limiting oversight.<sup>164</sup> These gaps obstruct the public's ability to discern the sources of policy influence and raise concerns that foreign interests prioritize their agendas at the expense of American citizens.<sup>165</sup>

Several scholars argue that FARA's emphasis on propaganda is outdated and limits its effectiveness in addressing modern foreign influence.<sup>166</sup> Initially enacted in 1938 to combat Nazi propaganda, FARA was primarily designed to expose and counter foreign efforts to manipulate public opinion.<sup>167</sup> As foreign influence tactics evolved, FARA's focus gradually shifted toward regulating lobbying activities by foreign agents. However, despite these application changes, lawmakers have kept FARA's core language rooted in its original anti-propaganda framework, leaving much of its inflammatory wording intact.<sup>168</sup> Some critics urge lawmakers to restructure FARA and remove provisions targeting political subversion, arguing that other statutes handle this function more effectively.<sup>169</sup> Scholars and policymakers assert that FARA should prioritize transparency in foreign lobbying and emphasize the legitimate economic interests of nations.<sup>170</sup>

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<sup>164</sup> Ibid.

<sup>165</sup> Atieh, Jihad. "Foreign agents: updating FARA to protect American democracy." *U. Pa. J. Int'l L.* 31 (2009): 1051.

<sup>166</sup> Baker, Mark B. "Updating the Foreign Agents Registration Act to Meet the Current Economic Threat to National Security." *Tex. Int'l LJ* 25 (1990): 23.

<sup>167</sup> Straus, J. R. "Foreign Agents Registration Act (FARA): Background and issues for Congress." *Congressional Research Service* (2020).

<sup>168</sup> Atieh, Jihad. "Foreign agents: updating FARA to protect American democracy." *U. Pa. J. Int'l L.* 31 (2009): 1051.

<sup>169</sup> Baker, Mark B. "Updating the Foreign Agents Registration Act to Meet the Current Economic Threat to National Security." *Tex. Int'l LJ* 25 (1990): 23.

<sup>170</sup> Wark, Wesley. *How allies do it: Five Eyes foreign influence transparency registries*. Centre for International Governance Innovation, 2024. and Rebo, Samuel. "FARA in Focus: What can Russia's Foreign Agent Law tell us about America's?." *J. Nat'l Sec. L. & Pol'y* 12 (2021): 277.

## Methodology

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With a greater understanding of the background of FARA, its strengths, and areas for improvement, it was the goal of the Capstone team to see what assertions made by the literature could be affirmed by the FARA data. This required compiling available DOJ FARA data into an annualized, comprehensive dataset.

The Capstone team utilized two separate but related data sources to conduct its analysis. First, the team used the DOJ's semi-annual reports, which are published on the DOJ's website and include narrative summaries of the activities conducted by FARA registrants and the finances for the given six-month period. Second, the team used the FARA eFile bulk data. This series of datasets is also included on the DOJ's website and contains detailed information on individual registrants. The semi-annual reports include unique information not found in the bulk data that the registrants submit to the DOJ periodically as supplemental materials. This separation of information makes it difficult for the public to reference, compare, and interpret the information in both the semi-annual reports and the bulk data. Using both sources of data creates a more comprehensive dataset that can increase the amount of information one can derive.

### Timeframe and Scope

The Capstone team utilized the DOJ semi-annual reports from 2001 to 2021. This timeframe was selected to provide context across multiple presidential administrations and potentially capture the effects of HLOGA, the most recent FARA amendment. The DOJ has not published a semi-annual report covering any period since 2021. Incorporating older semi-reports would have required more labor-intensive coding and was unfeasible in the timeframe allotted. Additionally, the semi-annual reports for the years 1992 to 1994 are missing. Thus, the team couldn't expand the analysis to include a pre-post analysis of the LDA introduction.

The FARA bulk data was extracted in early 2025 and included all registrations through December 31, 2024, to include the entire year in analysis. Thus, the data analyzed ends with the Biden administration. The bulk data files included FARA\_All\_ForeignPrincipals and FARA\_All\_Registrants, which reflect all foreign principals and registered agents in the eFile system. However, the team did not pull FARA\_All\_Registrants\_Docs, which included the types of documentation filed by registrants, as it was beyond the scope of the analysis.

### Process

The Capstone team analyzed FARA registrants using the DOJ semi-annual reports (2001-2021) supplemented by DOJ bulk data files. Thus, it was essential to convert the semi-annual reports into machine-readable data files. For quality control, two team members independently processed each half-year and compared the resulting files with one another, after which a third party reviewed the data line by line with the original semi-annual reports to ensure accuracy. The

end product, and the basis for the analysis, is four datasets—one with the semi-annual report data, supplemented by bulk data, spanning 2001 to 2021, and three datasets that show the entirety of the bulk data, from 1942 to 2024. One includes full-year annualized data, and the others include the spring and fall six-month registrations and terminations, respectively. To achieve this, the team had to annualize the FARA bulk data to transform it into a panel database suitable for analysis.

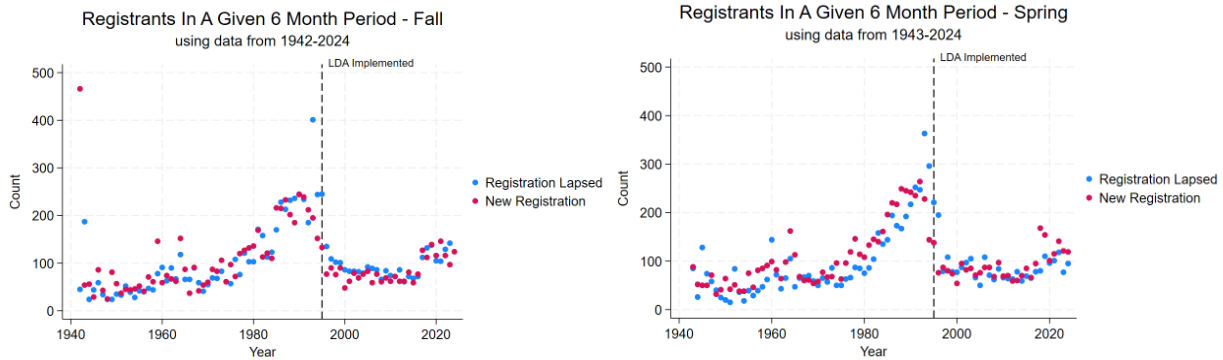
# Results

## Results by Individual Variables

### Foreign Agent Registrations and Terminations

Between 1942 and 2024, a total of 77,438 principal-agent-year observations were recorded (see Figures 1 and 2). During this period, there were 37 to 159 new agent registrations each year under FARA. Active foreign agents ranged from 153 to 886. The number of agents whose registrations lapsed annually ranged from 39 to 743. Lapsed registrations include foreign agents and principals who terminated their relationship or failed to renew their registration. In that same period, there was a range of 1 to 250 registrations lapsed in a given year between foreign agents and their principals. In the six-month fall reporting period, new registrations ranged from 25 to 466, while lapsed registrations ranged from 24 to 401. The number of new registrations in the six-month spring period ranged from 32 to 264, while lapsed registrations ranged from 15 to 363.

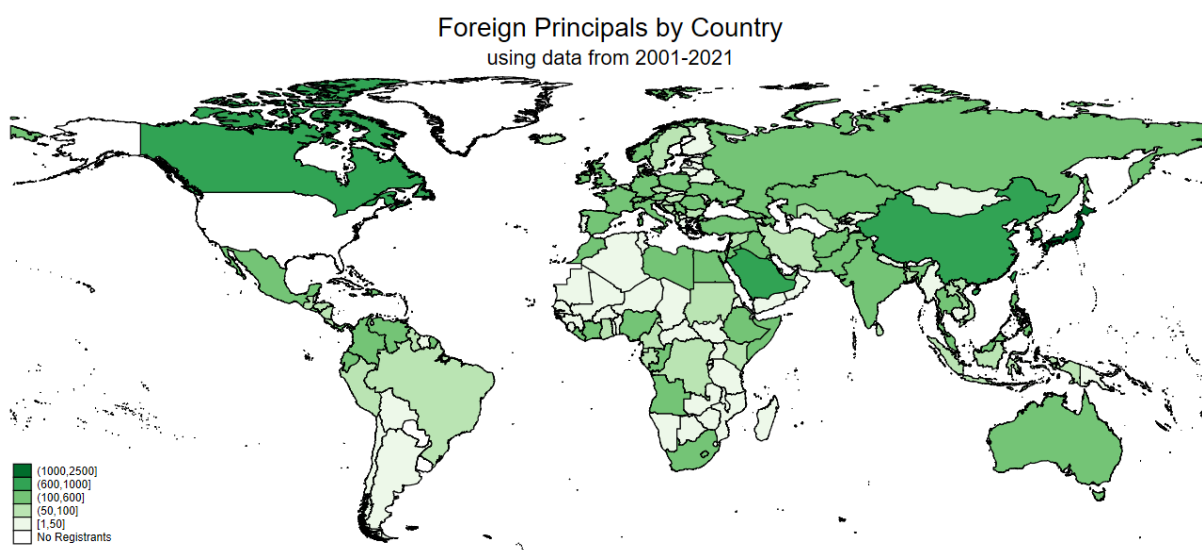
Figures 1 and 2: Semi-Annualized Registrations and Lapsed Registrations:  
Fall & Spring



## Countries Represented

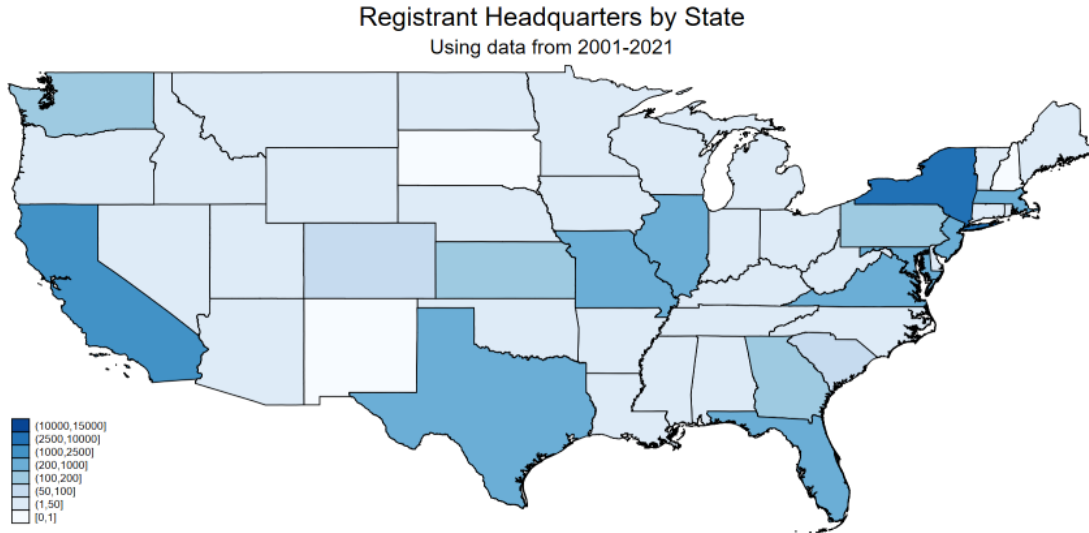
The Capstone team's analysis indicates that from 2001 to 2021, foreign principals from 212 countries were registered under FARA (see Figure 3). The ten countries with the largest number of foreign principals are: Japan (2,005); Korea, Republic of (903); Saudi Arabia (756); Canada (756); Taiwan (677); China (641); Mexico (584); Iraq (544); United Arab Emirates (526); and Great Britain (498). These countries account for ~31% of all foreign principals registered during this period, with Japan representing ~8% of the total.

*Figure 3: Foreign Principals by Country*



In addition to identifying foreign principals by country, the locations where their registered agents operated within the United States were also analyzed (see Figure 4). Foreign agents are registered in 47 states (Alaska, New Hampshire, and South Dakota have no registered agents), alongside Washington, D.C. and Puerto Rico. Most registrations are in Washington, D.C. (12,073). New York (5,038); California (1,343); Virginia (793); Illinois (637); Maryland (414); and Texas (379) had the highest rates of registrant addresses. Additionally, 2,188 registrant addresses originated in foreign countries such as Canada or the Bahamas. See Table 2 in Appendix A for more information on registrant addresses.

Figure 4: Registrant Headquarters by State



### Nature of Foreign Principals

The industry, affiliation, and sector of the reported foreign principals vary. This information could help understand trends of foreign influence in the United States by highlighting the types of entities exerting influence over time. After removing duplicate foreign principals, the 3,789 unique foreign principals recorded in the data from 2001 to 2024, including foreign principals who were a part of registrations before 2001 that continued into the timeframe, were sorted by industry. Industry category definitions are listed in Appendix B, and distributions are shown in the chart below. *Administrative Government*, which includes government agencies and figures that do not fall into other specified categories, comprised the largest percentage of foreign principals, totaling 49.01%. Government entities that fit into other specified industry categories were classified accordingly and marked as government-affiliated. *Commercial (unspecified)* was the second largest category at 14.12%, and *Investment/Development/Wealth* was the third largest at 9.24%. All other industries each comprised less than 7% of the 3,789 foreign principals. Our analysis revealed that 2,693 of 3,789 foreign principals (71.07%) had some form of foreign government affiliation. The team internally defined government affiliation as entities that were wholly or partially owned, operated, or governed by a foreign government. This includes official government agencies, elected officials, political parties and movements, and state-funded entities. The *Administrative Government*, *Political Parties*, and *Political Entities* categories were recorded as entirely government-affiliated. The categories with the following three highest government affiliation percentages were *Investment/Development/Wealth* at 67.71%, *Media* at 61.82%, and *Education/Research* at 42.55%. All other categories maintained government affiliation percentages lower than 25%. 1,096 of 3,789 foreign principals

(28.93%) had no clear foreign government affiliation. Further breakdown of industry categories and government affiliation can be found in Figures 5 and 6 below.

These findings highlight the broad scope of international influence within the U.S. and suggest that foreign governments exert their influence through fully or partially government-funded entities. Without careful inspection of these foreign principals, the full extent of foreign government influence may be underestimated. Additionally, a large number of government-affiliated foreign principals may suggest that entities without government ties utilize exemptions found in the Lobbying Disclosure Act of 1995 (LDA). The Capstone team notes that certain entities do not fall entirely into a specific category and were sorted using the team’s discretion. If nothing could be found, the foreign principal was categorized as *Other*.

Figure 5: Unique Foreign Principals by Capstone-Determined Category

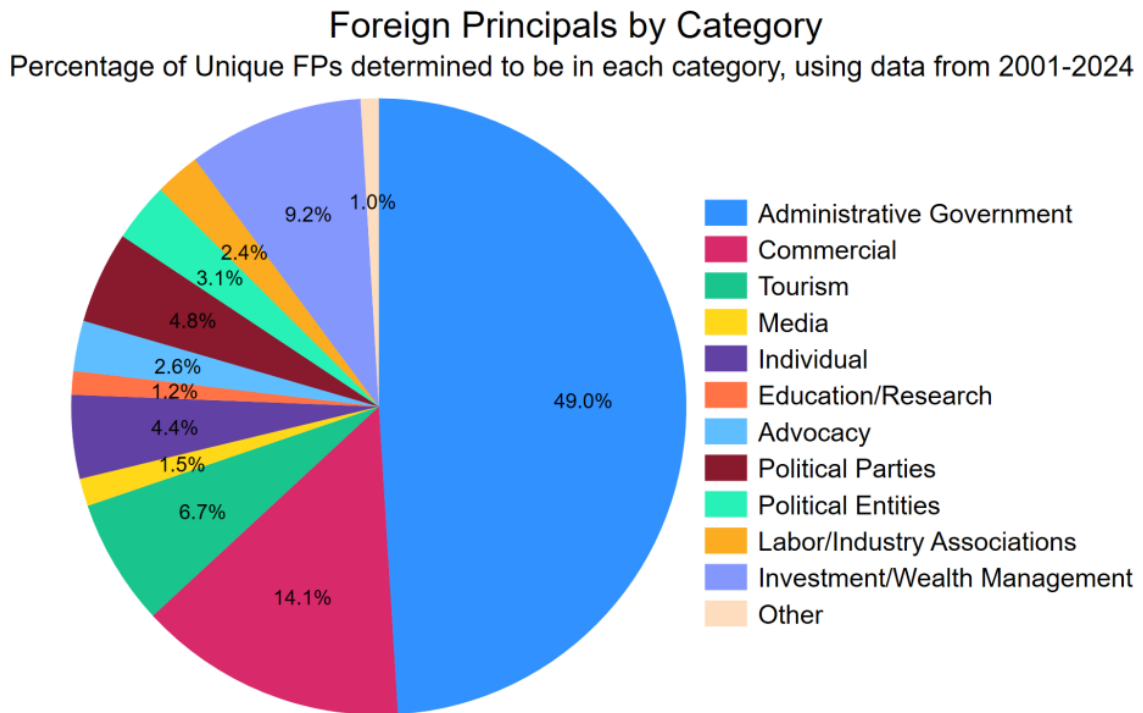
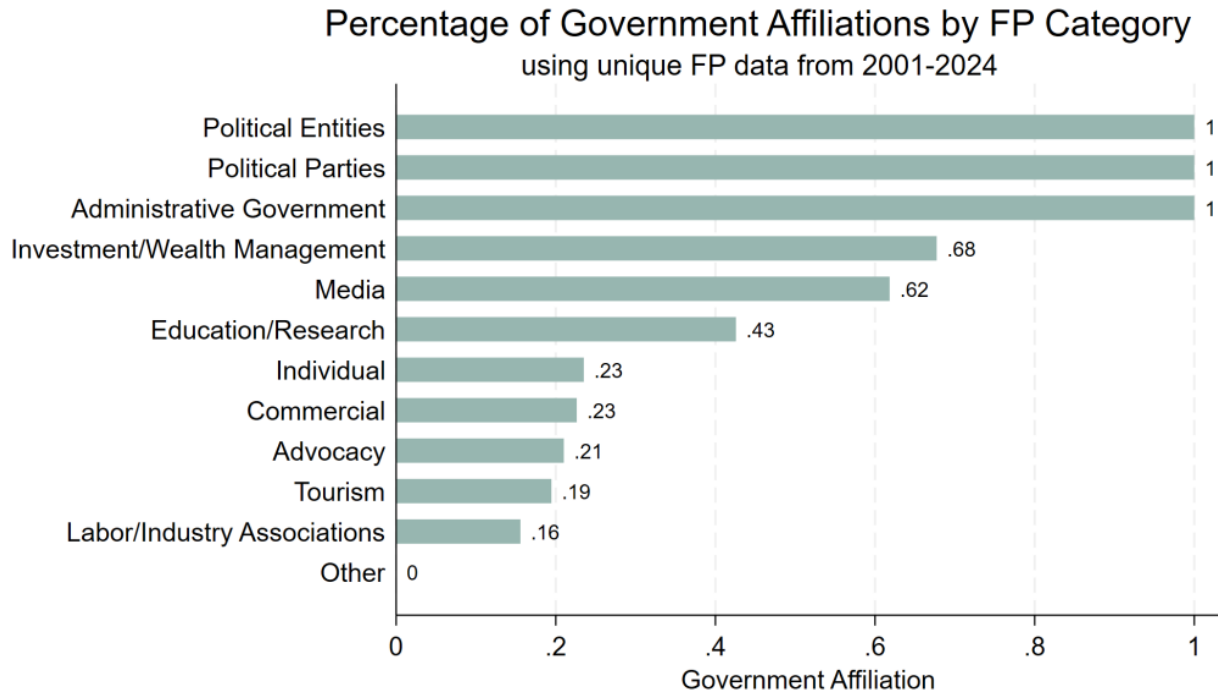


Figure 6: Percentage of Government Affiliations by Foreign Principal Category, Unique



Additional insight can be gained from viewing the categorization of foreign principals in regard to total appearances in the data, rather than as unique entities. This includes foreign principals who have multiple foreign agents and/or are registered for multiple years. Showing the categorization and government affiliation of foreign principals without removing duplicate appearances provides a holistic view of the scope of influence different industries are seeking to impart (see Figures 7 and 8).

Figure 7: Duplicate Foreign Principals by Capstone-Determined Category

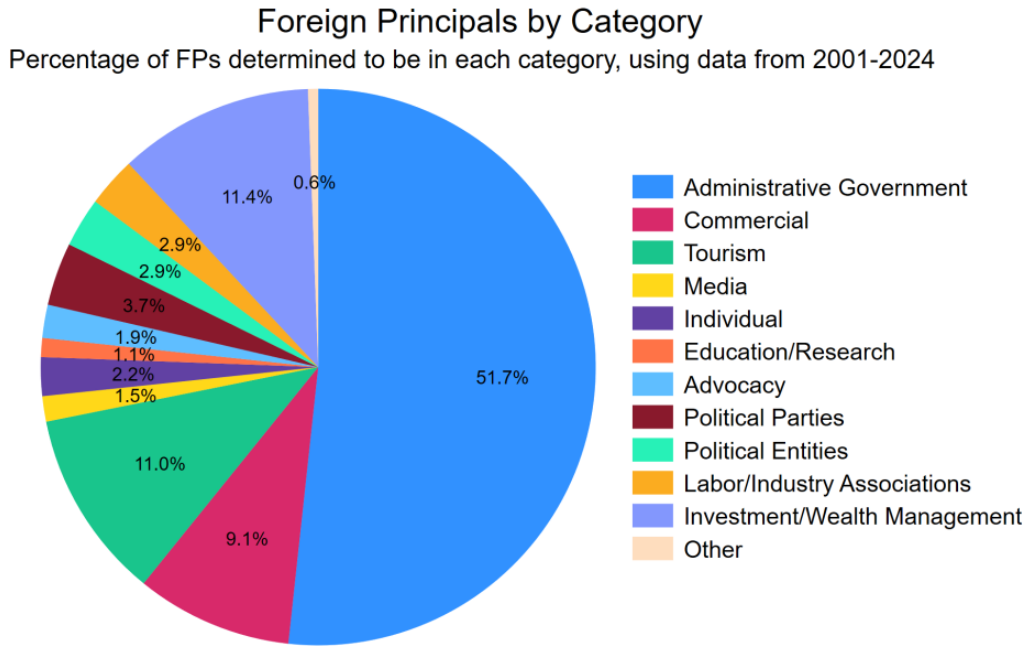
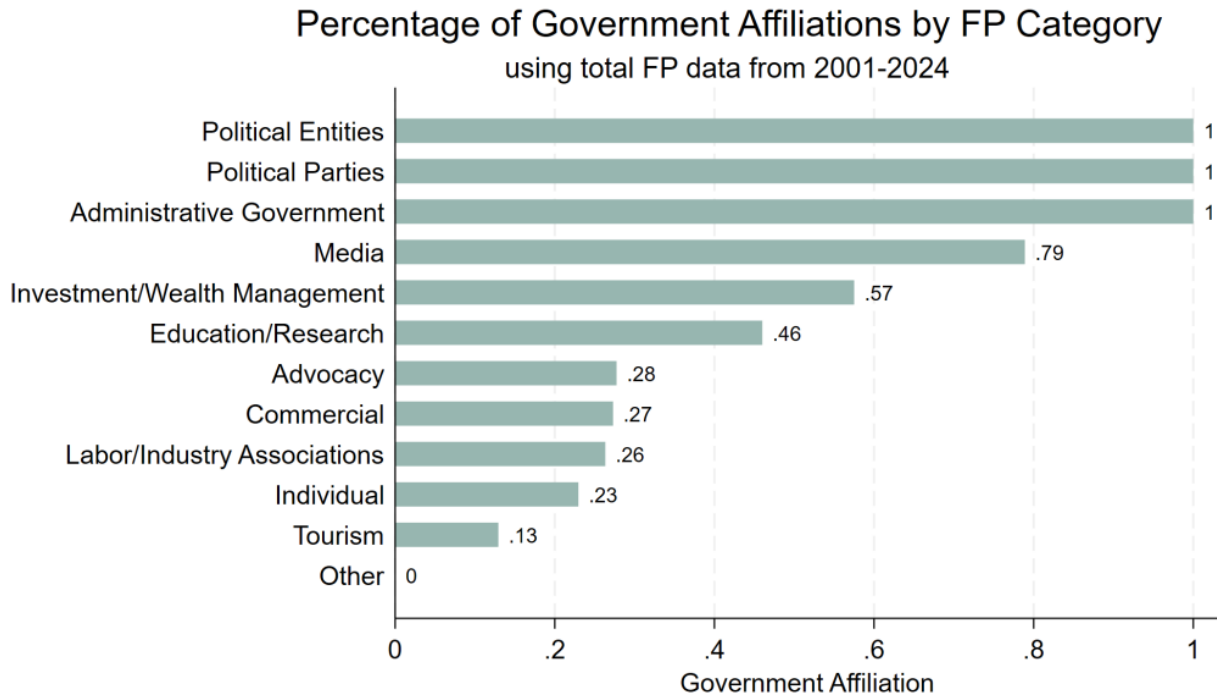


Figure 8: Percentage of Government Affiliations by Foreign Principal Category, Duplicate

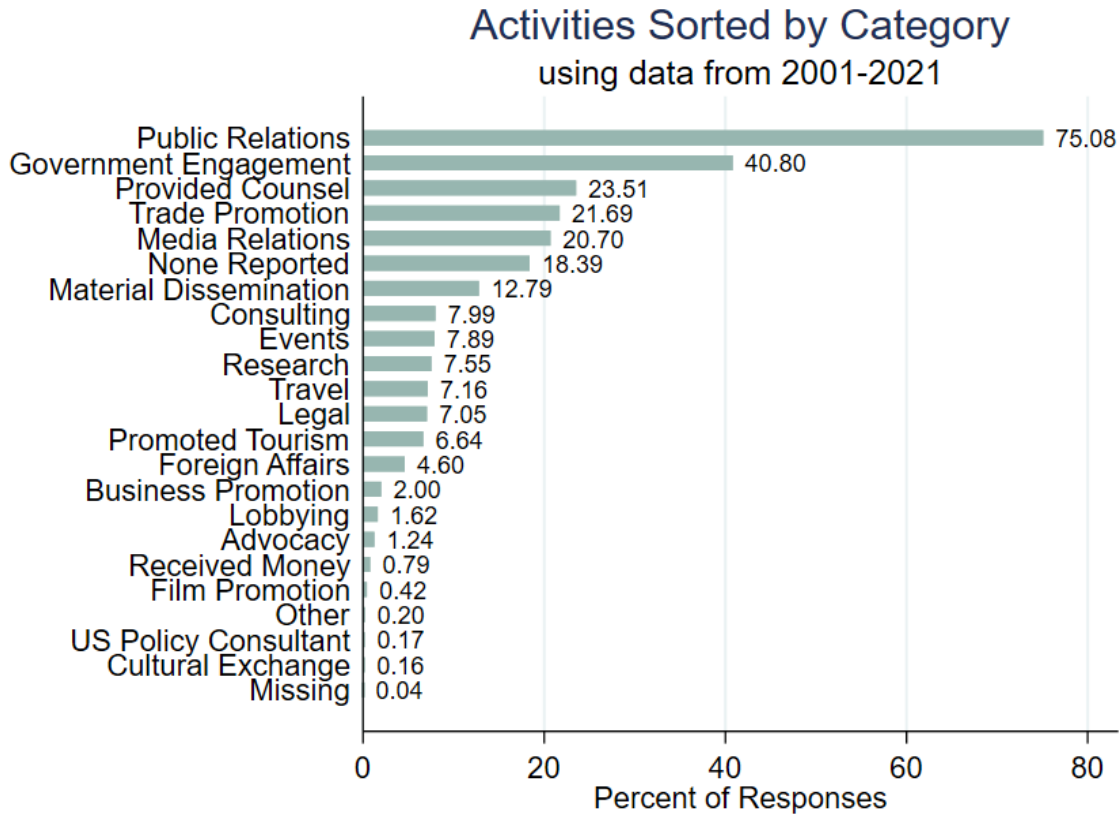


## **Types of Activities and Nature of Services Conducted by Foreign Agents**

Foreign agents engage in a variety of activities on behalf of their foreign principals, including *Government Engagement*, *Media Relations*, *Distribution of Materials*, *Trade Promotion*, and more (see Figure 9). Activities are reported in a short answer format and range from a sentence to a paragraph. Due to this, one paragraph can present multiple categories of activities. Activity categories are thus not mutually exclusive, and one response is likely to be coded for more than one category.

Findings show that the majority of agents' activities included *Public Relations*, with 75.1% of responses including this action (See Figure 9). *Government Engagement* was involved in 40.8% of responses, encompassing interactions with officials, Congress, and government agencies, as well as involvement in lobbying, public policy, government affairs, regulatory affairs, and policy recommendations. Additionally, 20.7% of agents' activities included *Media Relations*, engaging in activities related to media, journalism, and broadcasting. *Trade Promotion* is another prominent area, with 21.7% of participants involved in trade, commerce, and investment activities. Meanwhile, 12.8% of agents participated in *Disseminating Materials*, including distributing brochures and other informational content. Overall, 18.4% of registrants reported no activities. While only a small percentage of registrants are reporting *Material Dissemination* that FARA initially set out to track, a significant portion of registrants are performing *Government Engagement*, *Lobbying*, and *Providing Counsel*. These registrants are likely those that new legislation will seek to track further. However, with nearly 1 out of every 5 registrants not reporting any activities, there might also be interest in regulating the reporting of FARA registrants. The complete list and breakdown of the activities by registrants can be found in Figure 9, as well as an explanation of each activity can be found in Appendix C.

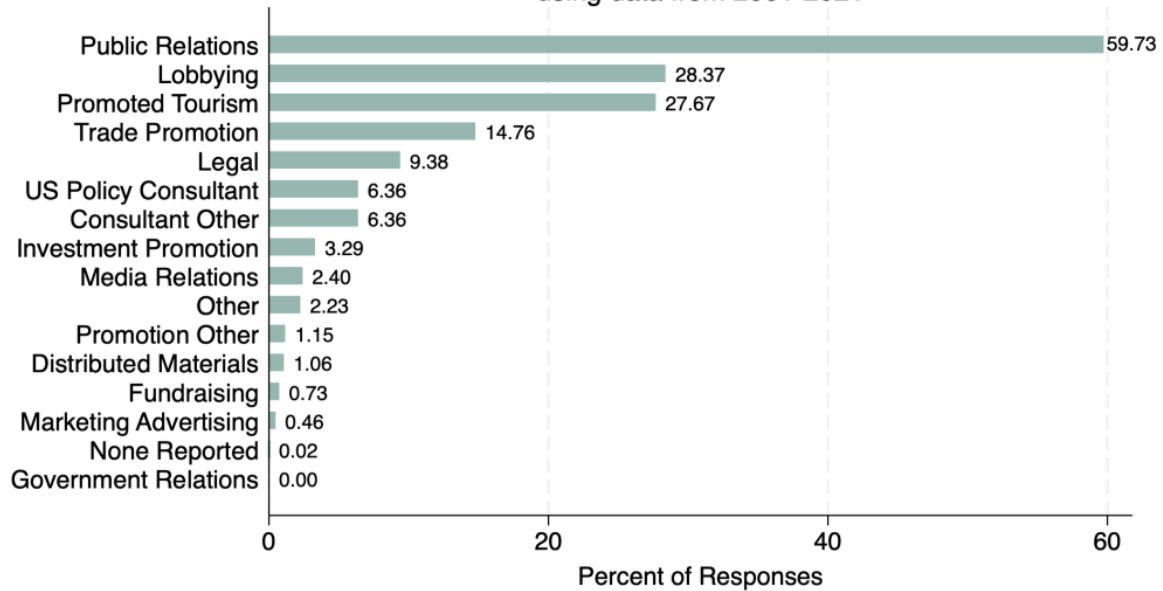
Figure 9: Activities Sorted by Capstone-Determined Category



The DOJ categorizes the activities of foreign agents according to the nature of their services. These service categories include *Lobbying*, *Public Relations*, *Tourism Promotion*, *U.S. Policy Consulting*, and other related services (see Figure 10). From 2001 to 2021, 59.7% of agents engaged in *Public Relations*, which involves activities such as influencing U.S. public opinion, media narratives, or policymaker perceptions on behalf of foreign principals. *Lobbying* was the second most common nature of service, with 28.4% of agents participating in interactions with government officials, Congress, federal agencies, and public policy work related to recommendations or lobbying for specific industries. The third most common category was *Tourism Promotion*, at 27.7%. This includes promoting countries as travel destinations through media outlets, collaborating with American airline companies, or hosting tourism-related events in major U.S. cities at expos. Less than 1% of agents engage in government relations, representing foreign governments, or strengthening their connections within the U.S. government. Compared to the high percentage of activity reports that included government engagement, these findings suggest a discrepancy between how agents categorize their work and the activities they undertake. Additionally, the high percentage of agents that indicated their nature of service as *Lobbying* raises questions about why these registrants choose to register under FARA instead of the LDA. For an explanation of each nature of service, see Appendix D.

Figure 10: Nature of Services Sorted by Category

**Nature of Services Sorted by Category**  
using data from 2001-2021



The distinction between the nature of services and activities lies in how registrants self-report the nature of their work versus the actual work they perform. Like activities, the nature of services can fall into multiple categories. For example, a broader service category of *Public Relations* might have included several activities such as *Public Relations*, *Media Relations*, and/or *Promotion* of an activity. This means that for a single nature of service, several activities could have been recorded.

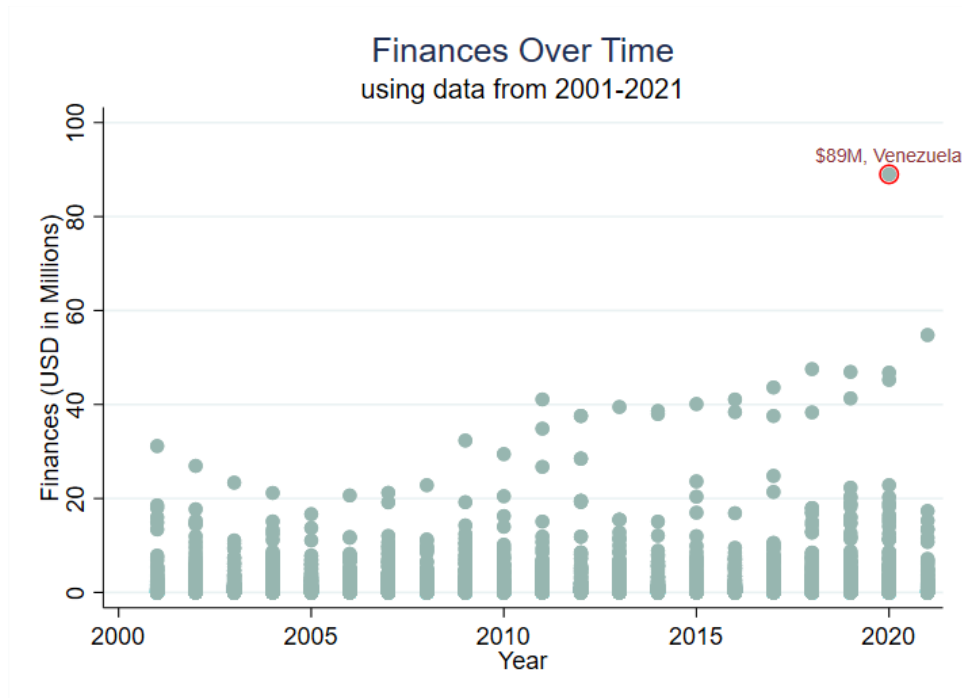
An example of how this can create discrepancies, however, is when registrants reported their nature of service as *Lobbying* and their activities did not include *Lobbying*. There were over 9,000 instances of registrants reporting *Lobbying* as their nature of service. However, in only 322 of these instances did they report their activities to include the word “lobbying”. Additionally, there were 86 instances of a registrant’s activities, including *Lobbying*, but they did not identify it as their nature of service. For registrants that reported *Lobbying* as their nature of service, their activities were primarily sorted as *Public Relations* (7,299) and *Government Engagement* (5,989).

### **Financial Transactions and Compensation**

The financial scope of foreign agent activities is significant, with semi-annual disclosed transactions ranging between \$0 and \$89 million and averaging approximately \$417,615 for the years 2001 to 2021 (see Figure 11). All finances are self-reported and not adjusted for inflation across the data. Totalling 20 years of funding, the highest reported country totals originated from Liberia, Japan, the Republic of Korea, the Bahamas, and Ireland, with foreign principals' cumulative transactions totalling \$0 to \$1,035 million over 20 years. Additionally, there were

8,701 instances where agents recorded “None Reported” in the financial section, accounting for 35.5% of the 24,509 total reported cases since 2001. Thus, more than one-third of the records reported no financial activity. It is unclear if there was no money exchanged for the services or if they were not reporting due to a lack of enforcement.

*Figure 11: All Reported Finances Over Time*



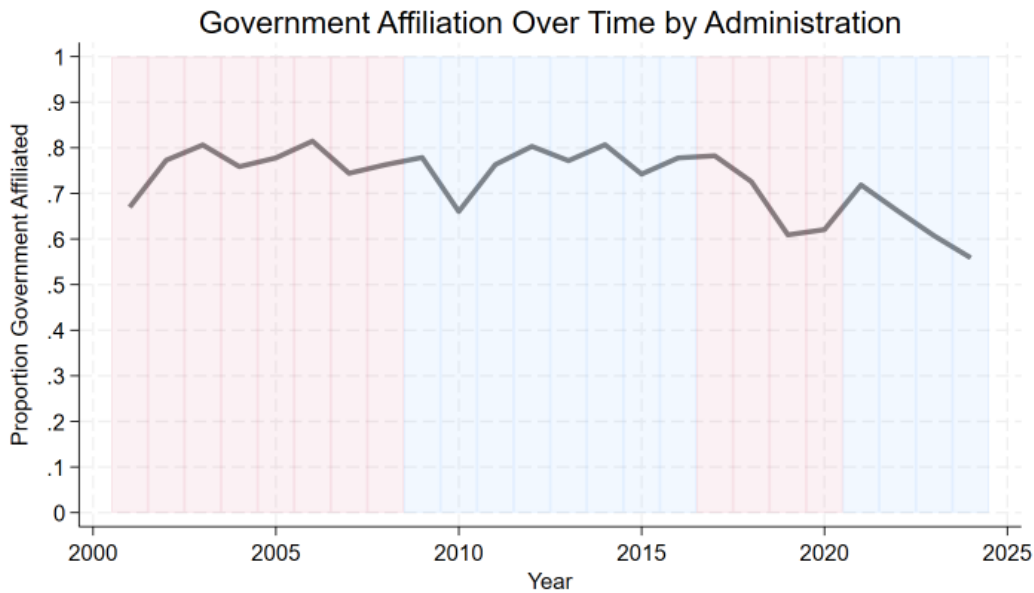
Tracking financial transactions reported under FARA offers insight into the influence of foreign entities on U.S. policy, business, and public opinion. The data show significant fluctuations in payments, with a striking outlier of \$89 million from Venezuela in 2020. As noted by the registrant, the funds were used to run pro-Venezuelan and anti-U.S. sanctions advertisements in national newspapers, enhance the foreign principal’s reputation among officials, provide policy consulting, and offer legal services to the principal and its subsidiaries, all of which can raise questions about transparency, compliance, and the broader implications of foreign lobbying efforts. Understanding these financial patterns helps assess the extent of foreign influence in U.S. affairs and informs discussions on regulatory oversight.

### ***Trends***

In an effort to provide a wider context for any changes and trends from the data, the Capstone team performed various cross-tabulations of the available data. The Capstone team evaluated several different variables to see how they might have changed over each of the presidential administrations from 2001 to 2021—George W. Bush, Barack H. Obama, Donald J. Trump, and Joseph R. Biden.

Government affiliation has fluctuated between 55% and 85% across presidential administrations, but the fluctuations remain relatively constant, with a small decline (and subsequent uptick) in the Trump administration and a decline in the Biden administration (see Figure 12). However, the data demonstrate no statistically significant upward or downward trend in the percentage of government-affiliated principals over time.

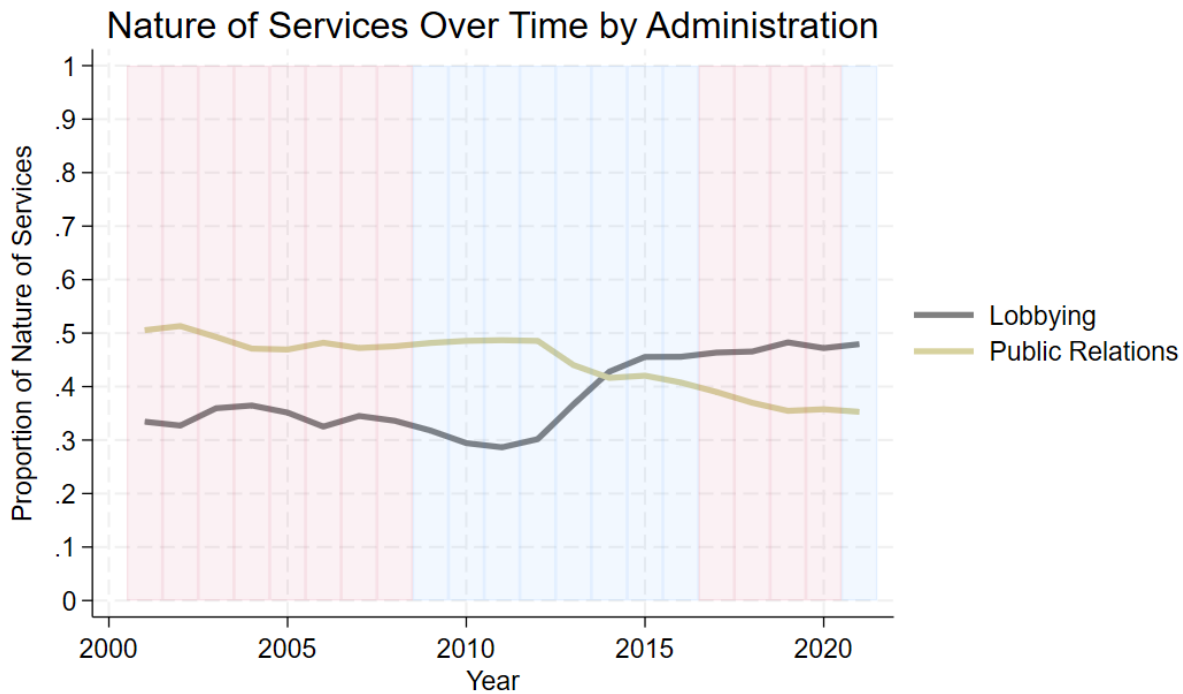
Figure 12: Government Affiliation Over Time by Administration



The Capstone team analyzed the data for any change over time in the reported nature of services or activities by the administration. It was found that the three most frequently occurring activity categories of *Public Relations*, *Government Engagement*, and *Provided Counsel* maintained relatively small and steady growth with only minor fluctuations until the start of the first Trump administration. At that point, each of the three categories experienced a small spike, and *Public Relations* continued to increase, ending the first Trump administration with its proportion of activities nearly 10% higher than at the start.

Another observation was the apparent swap in the use of *Lobbying* and *Public Relations* as the popular nature of service category (see Figure 13). The proportion of registrants citing each service stayed relatively consistent with only minor fluctuations until after 2012. At this point, *Public Relations* decreases in use and *Lobbying* increases in use, crossing each other in 2014, and seemingly replacing each other at the original proportion marks. This potential substitution of the term *Lobbying* for *Public Relations* could be the result of some kind of signaled stigma, a disappearance thereof, or an attempt to be more accurate in reporting.

Figure 13: Top Two Nature of Services Over Time by Administration

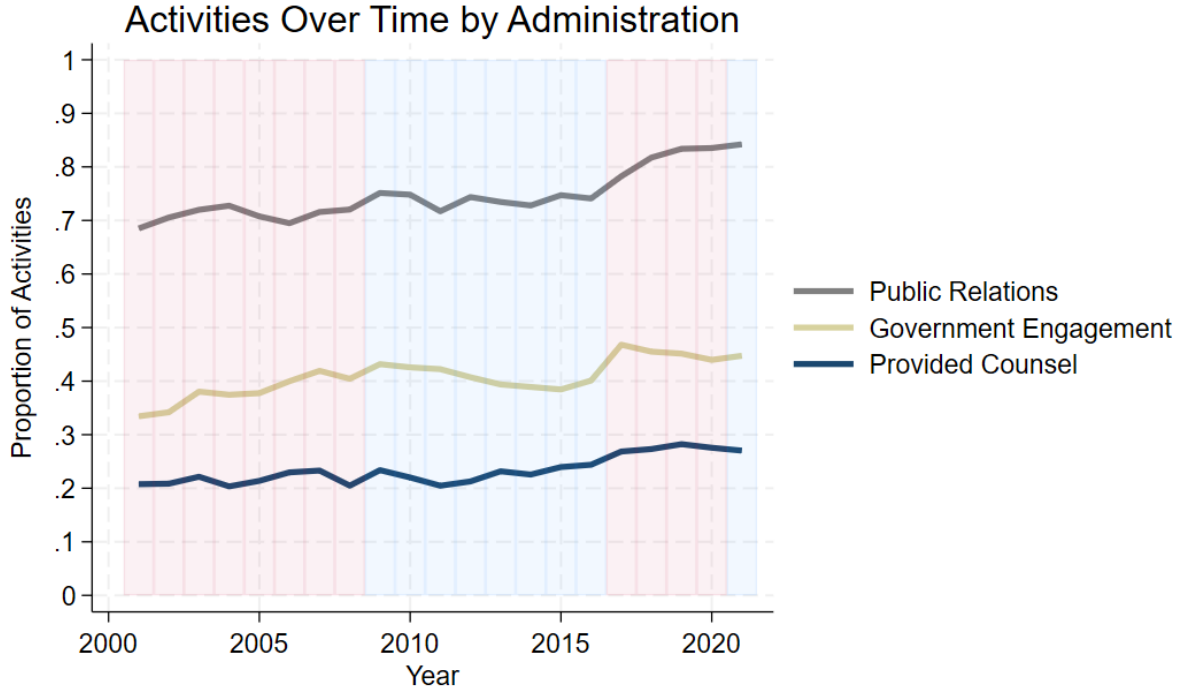


In analyzing the top three activities across the 20 years, the Capstone team did not find any statistically significant time trends, aside from one (see Figure 14). The only exception was *Public Relations*, which had a time trend with a steady increase across the 20 years. There was a statistically significant increase across each presidential administration, except between the Trump administration and the start of the Biden administration. This supports the trend of the increase of *Public Relations* as a nature of service over time.

There was no significant trend over time for *Government Engagement*, *Providing Counsel*, or *Lobbying*. However, there was some significance between administrations. For *Government Engagement*, there was an increase between the first and second terms of George W. Bush. Additionally, the Biden administration was greater than the Bush administration and Obama’s second term, but there was no difference between the Biden administration, Obama’s first term, and the Trump administration.

For *Provided Counsel*, the Biden administration was not different from the Trump administration, however, it did have a higher quantity of responses for *Providing Counsel* than the Bush and Obama administrations. *Lobbying* saw virtually no trends between administrations. The only significant difference was that the Bush administration saw less lobbying than the Biden administration, but at a small percentage point difference.

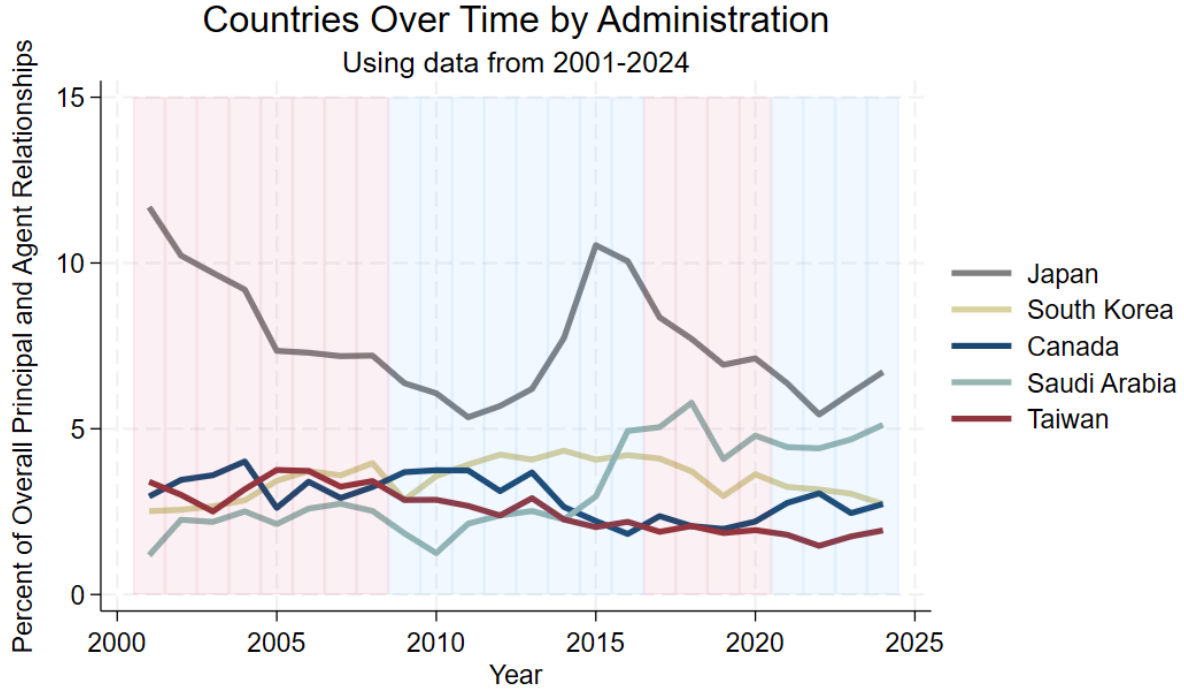
Figure 14: Top Three Activities Over Time by Administration



The Capstone team also looked at the top ten countries with the most foreign principals during each presidential administration from 2001-2024 (see Figure 15). Japan consistently stayed at the top of the list, and Canada and the Republic of Korea remained in the top ten but moved along the ranking. Interestingly, the first Bush term saw the eighth highest country being International, the DOJ-assigned catch-all category for entities that belong to multiple countries or none at all. One can also infer that the appearance of some countries on the top ten list may correspond with world events. For example, Iraq appears in the top ten for the first time during this period under the Bush's second term, perhaps corresponding with the continuation of the Iraq War. The first Trump administration saw the first appearances of China and Qatar in the top ten during this period, and both countries remained in the top ten during Biden's term. Additionally, Mexico and Canada both appear on the top ten list consistently but drop further down the list as time passes, with Mexico falling out of the top ten during the Trump administration.

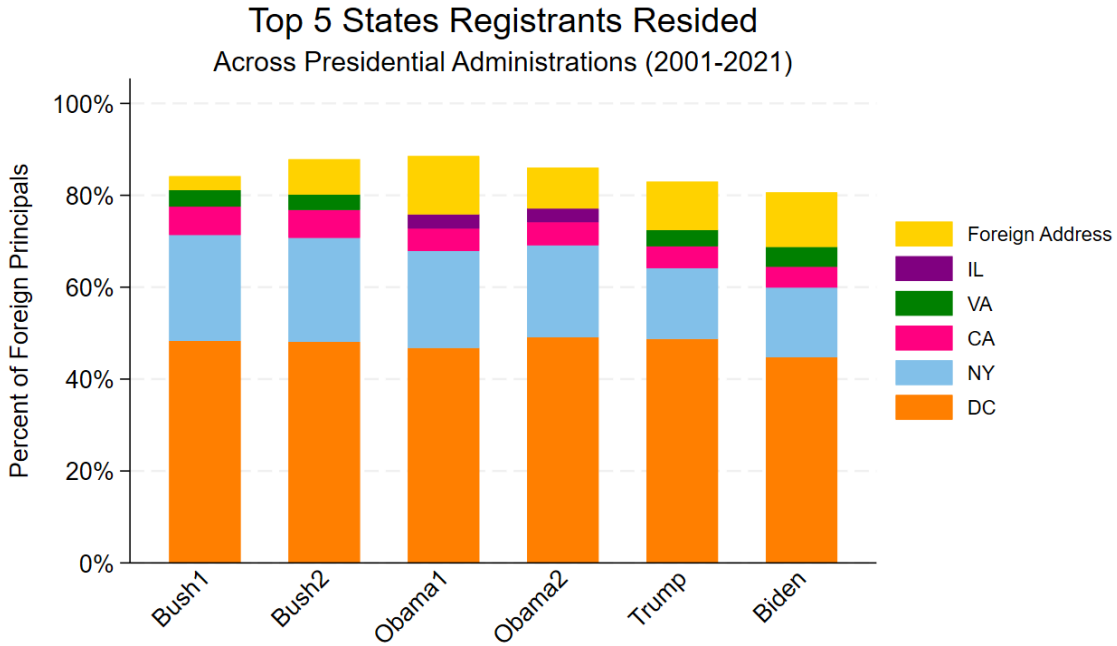
Across the top ten countries with the most foreign principals, the common types of activities performed by their foreign agents for each country maintain similar proportions to the overall trend of activities. *Public Relations* is the largest activity category for each, followed by *Government Engagement*. While the rest of the activity categories do not rank in the same order across all of the top ten countries, they maintain close proportions with each other and do not deviate by large quantities.

Figure 15: Top Five Countries Over Time by Administration



The states where registrants reported their main address remained relatively consistent across each presidential administration (see Figure 16). Washington, D.C., remained the majority across all presidential terms, with New York following. Interestingly, during the Obama administration, the state of Illinois—Obama’s home state— saw a spike in registered foreign agents, only to drop out of the top five in 2016. During this time, Illinois' addresses surpassed those in Virginia. It is unclear whether this jump is due to any increased political activity surrounding the Obama administration or just an unrelated spike.

Figure 16: Top Five States for Registrant Headquarters by Administration



The Capstone team examined finances by presidential administration, unadjusted for inflation (see Figure 17). After fluctuating between \$300,000 and \$400,000 during the Bush administration, average reported finances began increasing steadily to a peak of over \$500,000 in 2012 before dropping back to the \$400,000 mark in 2016. During the first Trump administration, finances grew each year until peaking at just under \$600,000 in 2020. In 2021, finances dropped back down to below \$400,000. Venezuela proved to be a major outlier in 2020, with around \$89 million in spending in 2020. However, Liberia was the largest spending country for seven consecutive years in a row (2013-2019) before 2020, with the nature of the services and activities provided being public relations and maritime support. Liberia is consequently the country with the highest total reported finances, with over \$1 billion for the entirety of the 20 years (see Figure 18). South Korea and Japan follow Liberia with \$817 million and \$764 million, respectively.

Figure 17: Average Finances by Administration

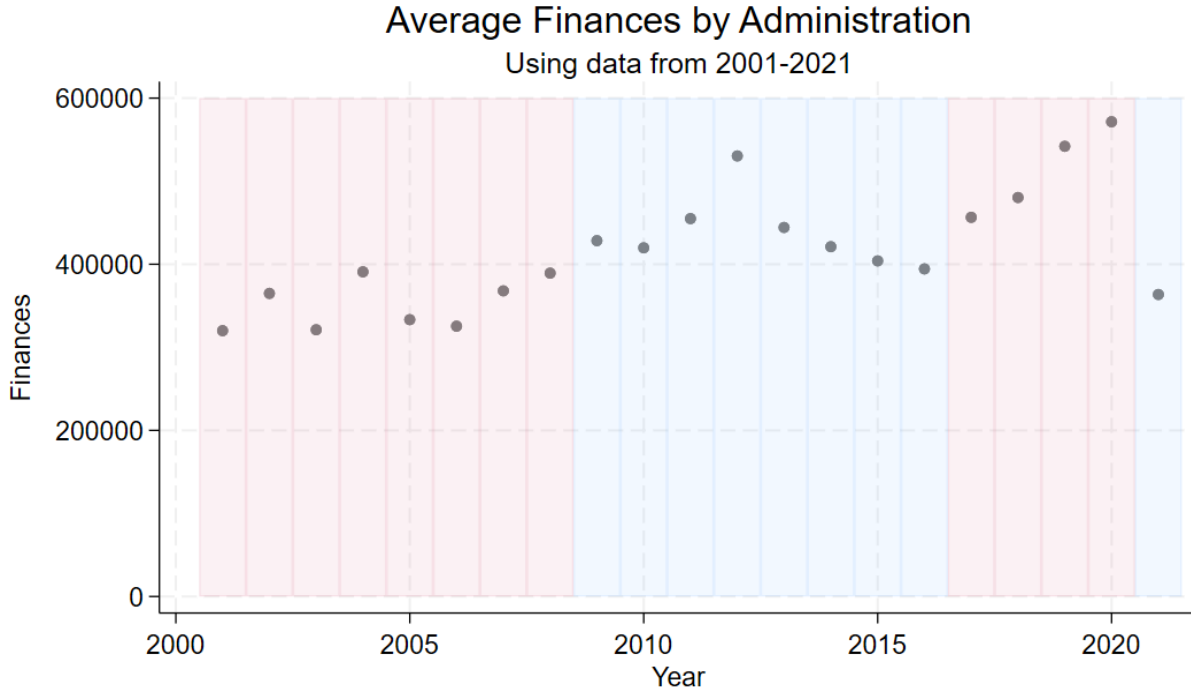
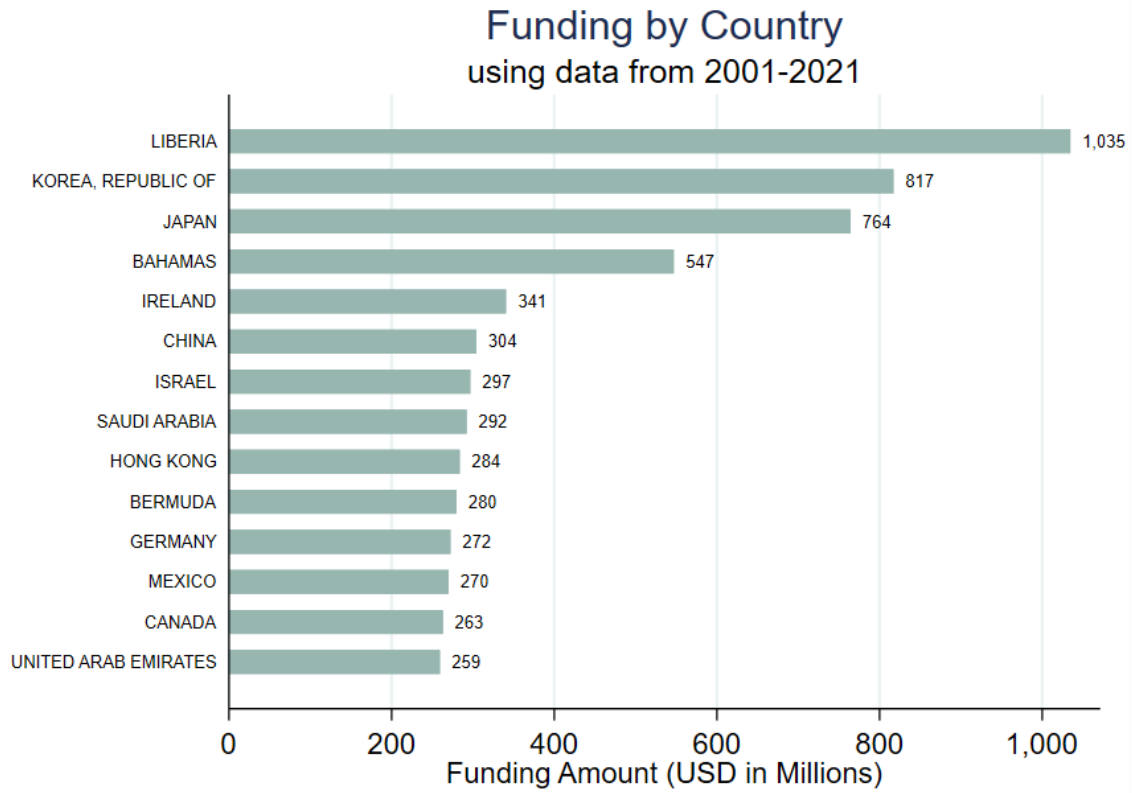


Figure 18: Total Finances by Country for the 20-Year Period



Analysis across variables also revealed potential discrepancies between activities and natures of service reported by registrants. A critical example of this practice is seen when viewing *Lobbying* as a category for activities and nature of service. The team found that 86 registrants reported lobbying as an activity but not as a nature of service. Viewed from the other direction, 9,355 registrants reported lobbying as their nature of service but did not explicitly use the word in their activity description. Only 322 registrants reported lobbying in both their activities and nature of service. This difference is statistically significant. For registrants who listed lobbying as a nature of service, common activity categories that they fell into other than *Lobbying* include *Public Relations*, *Government Engagement*, *Provided Counsel*, *Trade Promotion*, *Media Relations*, and *Legal*. This discrepancy and others like it could point to incomplete or inaccurate representations of the actions of foreign agents in the U.S.

Similar crosstabulations were run to see what natures of service were reported when the activities category was listed as *None Reported*. When activities were *None Reported*, 6,840 nature of services categories were still indicated, implying that action had been taken. The most commonly reported natures of service under this scenario were *Public Relations*, *Lobbying*, *Promoted Tourism*, *Legal*, *Consultant (Other)*, *U.S. Policy Consultant*, *Media Relations*, *Trade Promotion*, *Investment Promotion*, and *Fundraising*. Only 55 times when activities were listed as *None Reported* were the nature of service was also *None Reported*. Following the discrepancies in reporting lobbying, it is also interesting to note that the most common nature of services when activity was *None Reported* were *Public Relations* (1985) and *Lobbying* (1524). While those are the most prevalent nature of services overall, the gap between the two and the remaining natures of service exceeds that of the regular patterns (the next largest being in the 601). This inconsistency in reporting may indicate a failure of FARA to accurately convey foreign influence in the U.S. If the nature of services is reported, indicating activity took place, but no specific activity is described, information that FARA is intended to collect is being withheld.

The Capstone team also sought to analyze whether the passing of HLOGA in 2007 influenced any variables reported. The team saw a statistically significant difference in *Lobbying* as a nature of service pre- and post-HLOGA and in the foreign principal industrial categories. However, further research would be needed to determine if any part of this is due to HLOGA or simply a broader change in characterization over time.

## Discussion

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The Capstone team's data analysis reveals several patterns and considerations that warrant reflection, which demonstrate not only the importance of FARA but also the weaknesses in its current implementation.

One of the clearest insights is the impact of shifting global events and ties on FARA registrations. Over the past 20 years, the number of foreign principal and agent relationships from countries like Mexico and Canada, which have generally been in the top ten countries represented in the U.S., have been falling in the ranks, while countries like Saudi Arabia, Qatar, Iraq, and the Republic of Congo have increased in registrants. An increase in representation from Middle Eastern countries may correspond with increased U.S. engagement in energy markets, regional security issues, or a desire for U.S. investment. Longstanding trade and diplomatic partners, such as Mexico or Canada, may have more established avenues of influence and economic integration, reducing the need for formal representation under FARA as their relationships with the United States are more institutionalized and less dependent on active foreign agent efforts.

The data also demonstrates the role of foreign government-affiliated entities shaping U.S. policy and public opinion. The team's research indicates that over 70% of foreign principals with an agent acting on their behalf since 2001 are either wholly or partially owned, operated, or controlled by a foreign government entity. While much of this government affiliation is, by definition, from foreign governments, legislatures, and political parties, the presence of government ties in industries not typically associated, in Western countries, with formal state actors is notable. For example, government affiliation in the *Media* category accounts for 62% when only considering unique foreign principals, and rises to 79% when including foreign principals that have multiple agents across multiple years.

Concerns about financial transparency exist in FARA reporting, as 35.5% of agents labeled their finances as *None Reported*. The lack of reporting also raises concerns about potential gaps in disclosure requirements. Given the self-reported nature of FARA filing, it is unclear whether these entries simply reflect an absence of financial transactions or are actually a failure to disclose financial transaction information.

The analysis found potential discrepancies in how agents report and frame their work. The biggest example of this is the difference between the nature of services reports and activities reports, with disclosure being inconsistent in the quantity and quality of reporting.

Taken together, the Capstone team's analysis reveals that FARA's current filing and reporting structure, both from the foreign agents themselves and administratively by the DOJ, suffers from extensive transparency challenges. Many factors prohibit transparency throughout the entire process, including providing unusable data, ambiguity in reporting (and reporting

requirements), and inconsistent enforcement practices. For example, before analysis could begin, the team faces substantial obstacles in processing, cleaning, coding, and annualizing data to make it usable. This, irrespective of the transparency issues outlined in the data analysis, indicates that FARA's current reporting mechanisms are not effectively supporting the statute's primary goal: promoting transparency. Accordingly, this report will present recommendations to strengthen the transparency and capabilities of the FARA Unit through data management, administration, and clarifying ambiguities.

## Recommendations

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The Capstone team identified eight recommendations involving FARA's data management, administration, and definitional language. The following recommendations are informed by the Capstone's literature review and data analysis:

### Data Management of FARA

#### 1) Improve searchability of the FARA bulk database

The Capstone team recommends that the DOJ enhance the searchability of the FARA bulk database by incorporating additional data filtering options and clearer signposting during searches. The FARA Bulk Database offers options to narrow the search by registrant name, registrant number, type of filing, date of filing, and registrant status. However, the Capstone team recommends implementing a method to search for the foreign principal, the nature of services, or the represented country to make the information more accessible to the public.

For example, when using the Filings Full-Text Search function to search for information about the foreign principal "CCTV," a Chinese broadcasting company, the user is provided with every instance of the keyword "CCTV" appearing in FARA eFilings (see Figure 19). The search results include documents for unrelated registrants that discuss closed-circuit television (CCTV) video surveillance, as well as unspecified informational materials or supplemental statements regarding various registrants acting on behalf of CCTV. Moreover, using the *Search by Field* function, one can search for specific registrants by registration number. However, all registrations, documents, and filings made by the registrant are compiled into one list, making it difficult to discern which filings are appropriate for which foreign principals (see Figure 20).

Figure 19: Screenshot of Search Results Using the “Search By Field” Function for Registrant #3731, Captured 4/1/2025

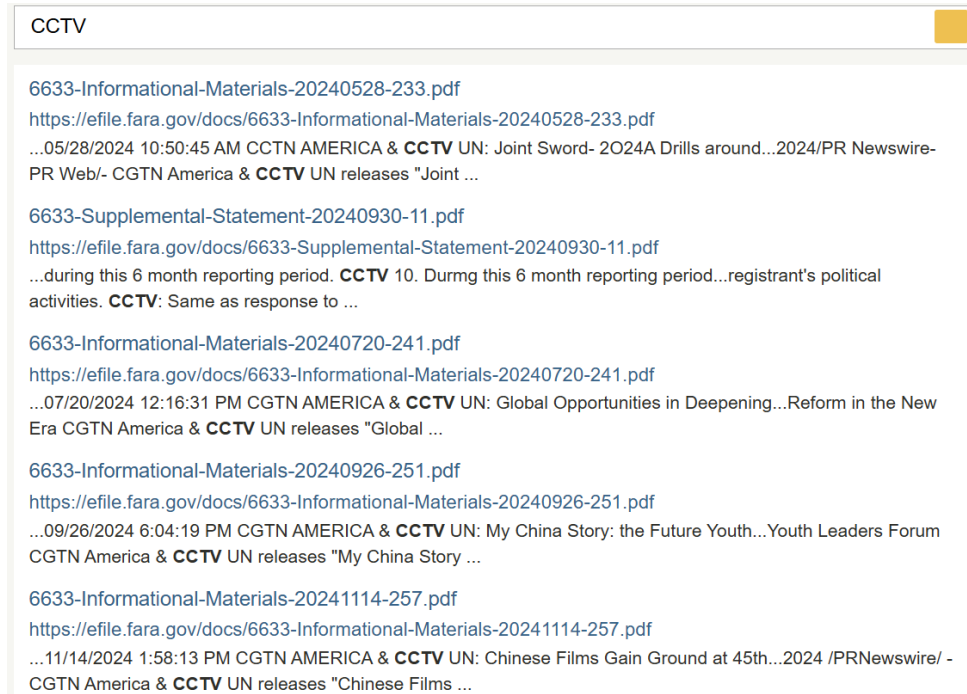


Figure 20: Screenshot from the “Filings Full-Text Search” Function, Captured 4/1/2025

DOCUMENT	REGISTRATION NUMBER	REGISTRANT NAME	DOCUMENT TYPE	STAMPED/RECEIVED DATE
<a href="#">Click Here</a>	3731	SIDLEY & AUSTIN	Exhibit AB	03/01/1992
<a href="#">Click Here</a>	3731	SIDLEY & AUSTIN	Supplemental Statement	09/01/1993
<a href="#">Click Here</a>	3731	SIDLEY & AUSTIN	Exhibit AB	10/01/1993
<a href="#">Click Here</a>	3731	SIDLEY & AUSTIN	Supplemental Statement	03/01/1993
<a href="#">Click Here</a>	3731	SIDLEY & AUSTIN	Amendment	04/01/1993
Available FARA Public Office	3731	SIDLEY & AUSTIN	Short-Form	03/10/1992
Available FARA Public Office	3731	SIDLEY & AUSTIN	Short-Form	03/10/1992
<a href="#">Click Here</a>	3731	SIDLEY & AUSTIN	Amendment	02/01/1992
<a href="#">Click Here</a>	3731	SIDLEY & AUSTIN	Exhibit AB	08/14/1991
<a href="#">Click Here</a>	3731	SIDLEY & AUSTIN	Exhibit AB	08/14/1991
Available FARA Public Office	3731	SIDLEY & AUSTIN	Short-Form	08/01/1991

**2) Include all registrant data within the FARA bulk database**

The Capstone team recommends that the DOJ include all information collected in the FARA bulk repository to provide more transparency and more robust data analysis for lawmakers and the American public. The Capstone team relied heavily on the FARA bulk database for analysis. However, there is information within the FARA filings themselves that would have been useful for analysis purposes. For example, Exhibits A, B, and C all include important information not in the downloadable FARA bulk data, including the nature and government affiliation of the foreign principal (see Figures 21 and 22). The information regarding which registrants filed what supplemental or required documentation is in the FARA\_All\_RegistrantDocs data file. However, this document operates the same as a bulk database search, in which it is unclear which document contains relevant or connected information. Additionally, the documents themselves are only accessible via web links rather than the information being included directly in the dataset.

*Figure 21: Screenshot from Exhibit AB, Registrant #3131, Filed on 11/10/2010*

5. Indicate whether your foreign principal is one of the following:

Foreign government

Foreign political party

Foreign or domestic organization: If either, check one of the following:

Partnership  Committee

Corporation  Voluntary group

Association  Other (specify): \_\_\_\_\_

Individual-State nationality \_\_\_\_\_

*Figure 22: Screenshot from Exhibit AB, Registrant #6525, Filed on 2/14/2018*

b) Is this foreign principal:

Supervised by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Owned by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Directed by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Controlled by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Financed by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Subsidized in part by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Additionally, the Capstone team recommends improving the synchronization of the bulk data and semi-annual reports. The semi-annual reports contain static data, which remain unchanged after initial publication. The bulk data, on the other hand, is a living collection of FARA reporting. These two information pools should be better linked to track elements such as registration renewals and terminations more accurately. In its analysis, the Capstone team

identified discrepancies between the semi-annual reports and bulk data, primarily due to a lack of synchronization. This lack of reconciliation paints an inaccurate picture of who should be registering during certain half-years and suggests that the DOJ could improve its oversight and reporting processes. Creating a method of synchronization would provide a more holistic view of required registrants at any given time.

### **3) Improve readability and quality of data**

The Capstone team recommends that the DOJ improve the readability and quality of both the semi-annual report and bulk data, having encountered unique challenges with each throughout the data collection and analysis processes. First, many of the semi-annual reports are not in a machine-readable format. Particularly before 2005, the reports appear to have been typed into a word processor and manually scanned. Thus, when attempting to read semi-annual report data into analysis software, the Capstone encountered many issues with the readability. For example, “government” was often read as “govemment”, zeros as Os, and ones as Is. This resulted in manual text editing to reflect the content of the semi-annual reports.

Additionally, some registrants in the semi-annual reports did not include their registration numbers with their entries. This was most commonly observed in the reports from June 2009 to December 2010, but also occurred sporadically throughout the remainder of the analyzed period. An example of an entry lacking a registration number is included below (see Figure 23). Ensuring that each entry contains the corresponding registration number is critical to proper oversight and transparency, as registration numbers serve as key identifiers. As part of its recommendation for improving data readability and quality, the Capstone team recommends ensuring that all relevant information is included consistently in the published semi-annual reports.

*Figure 23: Screenshot from FARA First Semi-Annual Report - 2010, Captured on 4/29/2025*

**Africa - African Travel Association, Inc.**

166 Madison Avenue  
Fifth Floor  
New York,, NY 10016

Africa Travel Association

Nature of Services: Promotion of Tourism

The registrant promoted travel, tourism and transport to and within Africa, and strengthened intra-Africa partnerships.

\$45,385.00, Hotel Rooms, and transportation tickets during the six month period ending June 30, 2010

#### **4) Ensure the timeliness of reporting**

The Capstone team recommends that the DOJ supply timely semi-annual reports to ensure transparency with Congress and the American people. FARA requires that the DOJ issue reports on FARA registrants to Congress “on a semi-annual basis”.<sup>171</sup> As of April 2025, the last semi-annual report published is for registrant data from the second half of 2021.

#### **5) Set continuity standards for FARA bulk data and semi-annual reports**

The Capstone team recommends that the FARA Unit set standards for data continuity for both the FARA bulk data and the semi-annual reports. Some data do not match or are entirely missing from the FARA bulk data and the semi-annual reports. For example, in several instances, one registrant was split into two observations because the registrant's name had changed. For example, a foreign principal in Kazakhstan was registered under two separate names with the same registration number—“Republic of Kazakhstan, Embassy” and “Republic of Kazakhstan, Embassy through Howard Communications.”

Moreover, the Capstone was unable to reconcile the labels of particular countries that had been modified over time. For example, some foreign principals were previously registered under the country label CONGO (BRAZZAVILLE) or CONGO (KINSHASA) (ZAIRE) and are now registered under CONGO, DEMOCRATIC REPUBLIC OF THE or CONGO, REPUBLIC OF THE, but are not always correlated to the appropriate pair for each country. In other words, some registrants were registered under CONGO (BRAZZAVILLE) and are now registered under CONGO, DEMOCRATIC REPUBLIC OF THE (registrant #6446, foreign principal Circle of Democrats and Republicans of Congo aka Cercle des Democratres et Republicains du Congo), and some registrants were registered under CONGO (KINSHASA) (ZAIRE) that are now registered under CONGO, REPUBLIC OF THE (registrant #6305, foreign principal Gecamines SA).

### **Administration of FARA**

#### **6) Align the reporting processes of LDA and FARA**

The Capstone team recommends altering the LDA reporting system to align with the FARA reporting process. As it currently operates, LDA requires its registrants to file reports with both the Secretary of the Senate and the Clerk of the House of Representatives.<sup>172</sup> Both chambers of Congress maintain searchable databases of registrant filings on their respective websites and keep records for transparency. The LDA reporting structure does not align with FARA, despite the close link between the two pieces of legislation and their potential for overlap from the LDA exemption within FARA. Due to the reach of this exemption, the Capstone team recommends aligning the LDA reporting system with that of FARA. This would create a single designated

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<sup>171</sup> Foreign Agents Registration Act, 22 U.S.C § 611-621

<sup>172</sup> Lobbying Disclosure Act of 1995, S.1060, 104th Cong. (1995).

body for LDA management and a database more akin to FARA's. This alignment would streamline LDA reporting, improve comprehension of LDA exemption utilization, and increase understanding regarding foreign influence within the United States.

### **7) Combine FARA and LDA administration**

The alignment of FARA and LDA would combine the two administrative processes. The Capstone team recommends that this combination occur within the DOJ, combining and adjusting resources accordingly. This would further increase transparency by ensuring that the reporting processes of these closely related laws follow parallel structures and maintain compatible searchability. In furtherance of transparency surrounding the LDA exemption and in alignment with a recommendation from the American Bar Association, the Capstone team also recommends that LDA reporting include a check box indicating whether a registrant is utilizing said exemption.<sup>173</sup> A review process can be instituted to ensure compliance. This addition would help to dissuade any registrants from hiding foreign activity within LDA that should, in reality, be filed under FARA. By combining the administration of FARA and LDA under the DOJ and instituting a check for the LDA exemption, reported data on influence within the United States would be more easily accessible for both the public and policymakers, contributing to FARA's goal of transparency.

### **Definitional Language**

### **8) Clarify ambiguous language with detailed definitions**

A frequent criticism of FARA is its use of vague and undefined terms regarding reporting requirements and exemption eligibility. To address this, the Capstone team recommends clarifying ambiguous language with detailed definitions. This action would help close exploitable reporting loopholes in FARA exemptions and enhance potential registrants' understanding of the expectations regarding when and where they are required to file.

One example of a currently ambiguous definition is the term "principal beneficiary." The LDA exemption is not available for foreign agents who have a foreign government or political party as their "principal beneficiary."<sup>174</sup> The interpretation of this definition is broad, and no entity has stated its exact meaning. Depending on how they interpret this definition, an agent may choose to register under FARA or LDA, subjecting themselves to a different degree of oversight than they may require. Agents could then be subject to selective prosecution, as it could be argued that they registered improperly under the wrong legislation. The lack of a firm definition also leaves a window open for potential exploitation if an agent is purposefully trying to avoid FARA registration in favor of LDA.

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<sup>173</sup> "FARA: Issues and Recommendations for Reform." *American Bar Association*, 2021.

<sup>174</sup> Covington and Burling, "The Foreign Agents Registration Act (FARA): A Guide for the Perplexed," January 31, 2023. <https://www.cov.com/en/news-and-insights/insights/2018/01/the-foreign-agents-registration-act-fara>.

Another phrase that needs clarification is “formal court proceedings.” In 1995, the LDA amendments to FARA narrowed the eligibility for FARA’s attorney exemption. Following this change, only attorneys representing foreign entities in “formal court proceedings” could utilize the exemption.<sup>175</sup> Failing to clarify what constitutes “formal court proceedings” could lead people to misuse this exemption and avoid FARA reporting in situations where it is required.

A third example of ambiguous language surrounding FARA is the phrase “traditional espionage” used in a memorandum from the Office of the Attorney General on February 5, 2025. When describing a shift in resources within the National Security Division, the memorandum states that FARA criminal charges “shall be limited to instances of alleged conduct similar to more traditional espionage by foreign government actors.”<sup>176</sup> The memorandum does not define “traditional espionage” and leaves open to speculation the range of actions that may still be criminally prosecuted. This ambiguity could benefit nefarious actors and decrease public understanding of the scope of foreign influence.

Additionally, the phrases used by the agents in their reported documents require clarification. As previously discussed, the Capstone team found that while eighty-six registrants listed lobbying as an activity, they did not list lobbying as part of their nature of service. 9,355 registrants included lobbying in their nature of service but did not explicitly describe it in their activities. This suggests that categorical definitions, such as *Lobbying*, are interpreted differently by registrants and that the self-reported FARA documents may not accurately reflect lobbying activity in the intended sense. This idea applies to all of the activities and the nature of service descriptions. Clarifying ambiguity in these definitions and standardizing the meaning of each label would provide a more accurate picture of foreign influence and registrant activity within the United States.

Clarifying definitions of key phrases would increase understanding of FARA expectations for the reporting agents, the foreign principals they represent, and the American public. These phrases are just some examples of many that demonstrate vagueness, potentially complicating FARA reporting and enforcement. Ambiguity risks creating compliance failures, and clarification would contribute to transparency in foreign influence by tightening exploitable loopholes and negating potential confusion.

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<sup>175</sup> Lipinski, Arie. “The Foreign Agents Registration Act Comes to Light amidst Probe into Russian Election Meddling: An Effort to Crack Down on Foreign Lobbyists or a Sign of Corruption,” 2017, 35. <https://doi.org/10.2139/ssrn.3132611>.

<sup>176</sup> Office of the Attorney General. *General Policy Regarding Charging, Plea Negotiation, and Sentencing*. February 5, 2025. <https://www.justice.gov/ag/media/1388541/dl?inline>.

## Limitations & Future Research

The Capstone team's research was constrained by several limitations, including the availability and accessibility of data, as well as the project's timeline. The team initially aimed to provide a more in-depth analysis of the LDA and any significant changes it may have introduced to the reporting of FARA. However, the semi-annual reports from 1992 to 1994 are currently unavailable on the DOJ's website. Since the LDA was enacted in 1995, these years would be crucial to a pre-post analysis.

Additionally, the Capstone team was interested in extending the categorization of foreign principals by nature further back to periods before 2001 using the FARA bulk data; however, this would take substantially longer than the provided timeframe and was limited by the challenge of researching older foreign principals who were active before widespread internet use. Relevant categorization information could be found in Exhibits A, B, and C of the FARA filings, but is not included in the FARA bulk data. As a result, categorizing such a large amount of foreign principals with minimal information that would have to be extracted manually was outside the scope of this project. The Capstone team would additionally be interested in doing more research into individual country reporting requirements to determine if the patterns of countries represented have their own registration requirements. The prevalence of Japan in the number of foreign principal and agent relationships due to the regionalization of agent headquarters could point to this phenomenon. If Japan has its own reporting requirements, it could drive the quantity and quality of reporting by Japan compared to other countries.

To support further research, the Capstone team has provided all relevant data, coding, and written methodological documentation to facilitate replication and expansion of the study. This would be particularly valuable if the DOJ publishes semi-annual reports to Congress after 2021. Additionally, further research can be applied to the second Trump administration and beyond to assess continuity or change based on the current data. Further research may require reframing of key questions or approaches, as the enforcement priorities, scope, and perceived importance of FARA evolve within the U.S. government. Changes in political party at the executive or legislative level, national security concerns, or other dynamics can affect the relevance of future research.

## Conclusion

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Since its passage, FARA has evolved beyond its original purpose of combating propaganda, however, it has continued to promote transparency regarding foreign influence in the United States. Ensuring that lawmakers and the American public are aware of who is operating as a foreign agent in the country is vital in safeguarding national interests.<sup>177</sup> However, with FARA nearing its ninetieth anniversary, the application of a law crafted in a vastly different era remains a topic of debate. Some argue that influence from adversarial nations like Russia and China should be scrutinized, or outright regulated, more than that from allied nations.<sup>178</sup> Moreover, in the increasingly globalized and interconnected digital world, there is debate about how FARA will apply to non-traditional media.<sup>179</sup> With the most recent changes to the administration of FARA, there are additional oversight challenges due to the FARA Unit's lack of a clear strategy and enforcement. The literature is consistent that FARA needs to be changed for better use in the 21st century and to improve the reporting of the data to ensure transparency.<sup>180</sup>

Regardless of how criticism, government priorities, and changing social environments shape FARA going forward, the Capstone team's data analysis corroborates the transparency issues that are pervasive in the literature. Additionally, the analysis helped shed light on FARA reporting and usage that contributed to providing recommendations to expand DOJ enforcement and transparency of the data.

The insight the analysis provided on FARA data and reporting included geographic trends of foreign agents and the industries in which their foreign principals were operating. It shows that Washington, D.C.; Puerto Rico; and every state except South Dakota, Alaska, and New Hampshire had at least one registrant in the period from 2001 to 2021. Over the 82 years from 1942 to 2024, a total of 212 countries were associated with foreign principals under FARA. Such geographic data is important for promoting transparency in foreign influence within the United States. Geographic data may also help to highlight important international relations, political, and economic events and trends. The industry and government affiliation status of the foreign principals may also contribute to relevant trends analysis, such as the potential link between the high government affiliation rate and the use of LDA exemptions. The Capstone team found that 72.7% of foreign principals in the period from 1942 to 2024 held some form of

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<sup>177</sup> O'Hara, Francis R. "The Foreign Agents Registration Act - The Spotlight Of Pitiless Publicity." *Villanova Law Review* 10, no. 3 (1965): 435–56.

<sup>178</sup> Robinson, Nick. "Foreign Agents in an Interconnected World: FARA and the Weaponization of Transparency." *Duke Law Journal* 69 (2019): 1075.

<sup>179</sup> Fattal, Joshua R. "FARA on Facebook: Modernizing the Foreign Agents Registration Act to Address Propagandists on Social Media." *New York University Journal of Legislation and Public Policy* 21, no. 4 (2019): 903–48.

<sup>180</sup> "Judiciary Committee Hearing: Enhancing the Foreign Agents Registration Act of 1938," 2022.

government affiliation, and the largest industry categories for these principals were *Administrative Government*, *Commercial (unspecified)*, and *Investment/Development/Wealth*.

In addition to the industry distribution of foreign principals, the team analyzed the activities and nature of services of the agents representing those principals. Common activities included *Public Relations*, *Government Engagement*, *Media Relations*, and *Trade Promotion*. The most prominent services reported include *Lobbying*, *Public Relations*, and *Promotion of Tourism*. This reporting is also important to transparency, keeping track of what actions are being taken on behalf of foreign entities within the United States. The overlap of the word “lobbying” as an activity with the nature of services of *Public Relations* and *Government Engagement* could indicate the use of ambiguous language rather than signaling that lobbying was being performed, despite it being an option for reporting the nature of services. This ambiguity of reporting is driven further by the fact that over 35% of finances were labeled as *None Reported*, and concerns whether there were in fact no financial transactions, or whether they are simply not being reported. Despite this, analysis of financial reporting in FARA could also add to the understanding of the extent of foreign influence and tracking if the average finances reported increase, or if countries like Liberia continue to top total spending per year.

Based on this analysis, supplemented with observations from the literature, the Capstone team identified eight recommendations involving three broad categories: FARA's data management, administration, and definitional language. This included to 1) improve the searchability of the FARA bulk database; 2) include all registrant data within the FARA bulk database; 3) improve readability and quality of data; 4) ensure the timeliness of reporting; 5) set continuity standards for FARA bulk data and semi-annual reports; 6) align the reporting processes of LDA and FARA; 7) combine FARA and LDA administration; and 8) clarify ambiguous language with detailed definitions. The ability of lawmakers and the American public to analyze this data and easily extrapolate trends or concerns is crucial to FARA's mission of transparency and fair reporting.

As the law currently stands, implementing these recommendations would align FARA more closely with its intended goal of promoting transparency in foreign influence within the United States. Enhancing data accessibility by improving data management, improving reporting accuracy by clarifying definitions and ambiguity in the law, and streamlining administrative processes can ensure the DOJ supports FARA's mission.

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**Appendix A:  
Tables and Figures**

**Table 2:** The Number of Foreign Principals that are Government-Affiliated or not Within Each Industry Category.

Foreign Principal Category	Not Government-affiliated	Government-affiliated	Total
Administrative Government	0	1,857	1,857
	0.00%	100.00%	100.00%
Commercial (unspecified)	414	121	535
	77.38%	22.62%	100.00%
Tourism	203	49	252
	80.56%	19.44%	100.00%
Media	21	34	55
	38.18%	61.82%	100.00%
Individuals	127	39	166
	76.51%	23.49%	100.00%
Education/Research	27	20	47
	57.45%	42.55%	100.00%
Advocacy	79	21	100
	79.00%	21.00%	100.00%

Foreign Principal Category	Not Government-affiliated	Government-affiliated	Total
Political Parties	0	183	183
	0.00%	100.00%	100.00%
Political Entities	0	118	118
	0.00%	100.00%	100.00%
Labor/Industry Associations	76	14	90
	84.44%	15.56%	100.00%
Investment/ Development/Weath	113	237	350
	32.39%	67.71%	100.00%
Other	36	0	36
	100.00%	0.00%	100.00%
Total	1,096	2,693	3,789
	28.93%	71.07%	100.00%

**Table 3:**

The Number of Registrants Per State, Territory, or if in a Foreign Country.

State	Frequency	State	Frequency	State	Frequency
DC	12,073	MI	41	WY	5
NY	5,038	MN	41	OK	4
Foreign Country Address	2,188	DE	36	WI	4
CA	1,343	NV	32	VT	3
VA	793	OR	31	AR	2
IL	637	PR	30	IA	2
MD	414	KY	27	MS	2
TX	379	TN	23	NE	2
NJ	289	AL	16	WV	2
FL	266	IN	16	HI	1
MO	240	ID	15	NM	1
MA	233	AZ	12	<b>Total</b>	<b>25,149</b>
WA	197	ME	10		
GA	184	NC	10		
PA	146	ND	9		
KS	113	LA	8		
CO	87	MT	7		
SC	74	UT	6		
CT	47	OH	5		
		RI	5		

## **Appendix B:**

### **Foreign Principal Categorization Guide**

All of the following category definitions were created by the Capstone team.

If a foreign principal is noted as being represented “through” an agency or organization (e.g., *Royal Embassy of Saudi Arabia through Qorvis Communications, LLC*), the team used the “through” entity for context and guidance. However, the categorization is based on the primary foreign principal—the initiating entity whose interests are being pursued. For example, the Royal Embassy of Saudi Arabia initiated the relationship, and their interests are being pursued. Therefore, even though Qorvis Communications is an LLC, this foreign principal will still be categorized as government.

#### **1. Administrative Government**

A branch, agency, or other arm of government that wields government authority, regulates, or otherwise acts on behalf of an established government and that does not fall into another industry category.

#### **2. Commercial (Unspecified)**

A for-profit organization whose main mission does not fall into one of the other specified industries listed below.

#### **3. Tourism**

A private or governmental organization whose mission is to promote or support the tourism industry in a region.

#### **4. Media**

An organization that produces and/or distributes digital or print media content as a primary business aim.

#### **5. Individuals**

An individual who advocates for their own cause, mission, or goals. Many of these individuals are or have been businesspeople, political candidates, or influential figures. However, their registration is not explicitly linked to those pursuits, or those pursuits are no longer relevant (e.g., they lost their political campaign).

#### **6. Education/Research**

A university, institute, or other organization specializing in education, research, and/or other academic pursuits.

## **7. Advocacy**

An organization, nonprofit or otherwise, whose mission is to advocate for a particular humanitarian, political, or social cause.

## **8. Political Parties**

An organization that holds, or seeks to hold, control over a country's government, legislature, or other elements of political authority, typically through traditional political processes.

## **9. Political Entities**

An organization that is not a formal agent of an established government or a political party but that operates for its own political interests or objectives within the country.

## **10. Labor/Industry Associations**

An organization, union, or association that advocates on behalf of a particular industry or the workers of an industry. Includes nonprofit organizations that work on related matters.

## **11. Investment/Development/Wealth**

An organization, bank, or business that manages investment or wealth for an individual, region, or country, or advocates for development and investment in a region or country.

## **12. Other**

An organization that the team did not deem as appropriate for any of the other categories.

## **Appendix C: Activities Categorization Guide**

Due to the written nature of the activities, the team needed to identify keywords that could group the different types of activities performed by agents. This guide outlines the different activity variables made from this categorization, and some examples of the activities and keywords used for each.

### **1. ActProvidedCounsel**

Activities relating to providing counsel, including counseling, advising, offering guidance, and providing information.

### **2. ActPublicRelations**

Activities relating to public relations, including marketing, communications, branding, press briefings and releases, and public speaking.

### **3. ActConsulting**

Activities relating to consulting services, including strategy advice, general support, and technical assistance.

### **4. ActPromotedTourism**

Activities relating to promoting tourism in the region, including marketing travel opportunities, tourist destinations, and regional visitor attractions.

### **5. ActGovernmentEngagement**

Activities relating to government engagement, including meetings with officials or government employees, lobbying, and direct policy engagement.

### **6. ActMediaRelations**

Activities relating to media relations, including journalism, broadcasting, collaboration with media outlets, website work, and advertising campaigns.

### **7. ActMaterialDissemination**

Activities relating to disseminating materials, such as distributing publications, reports, or informational content.

### **8. ActLegal**

Activities relating to legal work, including litigation analysis and working with legal statutes or Acts.

## **9. ActResearch**

Activities relating to research, including analysis, evaluation, and the preparation of investigative or research reports.

## **10. ActNoneReported**

Cases where no services were reported, or the registrant specifically noted “None Reported.”

## **11. ActEvents**

Activities relating to organizing and hosting events, including conferences, panel discussions, ceremonies, lectures, and dinners.

## **12. ActTravel**

Activities relating to travel, including travel planning or travel-related visits, such as student or courtesy visits.

## **13. ActTradePromotion**

Activities relating to promoting trade, including efforts to increase exports, investment, and commercial exchange.

## **14. ActForeignAffairs**

Activities relating to foreign affairs, including diplomacy, international relations, promotion of democracy, and relations with specific countries (e.g., US-Mexico relations).

## **15. ActUSPolicyConsultant**

Activities relating to US policy consultation, including US policy analysis, US legislative strategy, and US government advising.

## **16. ActFilmPromotion**

Activities relating to promoting films, including screenings, publicity campaigns, and distribution efforts

## **17. ActReceivedMoney**

Activities relating to monetary transactions, such as receiving donations, raising funds, or collecting taxes and fees.

### **18. ActBusinessPromotion**

Activities relating to promoting business(es) for a region, including attracting businesses, industrial development, encouraging commercial projects, and business outreach.

### **19. ActMissing**

Cases where no activity was recorded, or the entry was labeled “Inactive” or “Not Finalized.”

### **20. ActAdvocacy**

Activities involving advocacy for a particular cause, policy, or position.

### **21. ActCulturalExchange**

Activities relating to cultural exchange, including cultural and educational projects.

### **22. ActLobbying**

Activities that explicitly used the word “lobbying” in its description.

### **23. ActOther**

Activities that do not fall into the categories above.

## **Appendix D: Nature of Services Categorization Guide**

### **1. NOSLobbying**

Nature of Services related to lobbying, such as attempting to influence legislation, policy, or government activities.

### **2. NOSPublicRelations**

Nature of services relating to public relations, including press releases, media messaging, and branding.

### **3. NOSPromotedTourism**

Nature of Services relating to services promoting tourism in the country/region, including travel marketing, destination promotion, and services aimed at increasing regional tourism.

### **4. NOSUSPolicyConsultant**

Nature of Services relating to U.S. policy consultation, such as policy analysis, legislative strategy, and advising U.S. government officials.

### **5. NOSTradePromotion**

Nature of Services relating to services promoting trade, including import/export facilitation, trade missions, and commercial partnerships.

### **6. NOSMediaRelations**

Nature of Services relating to services regarding media relations, such as working with media outlets, producing content for broadcast or journalism, and managing media outreach.

### **7. NOSInvestmentPromotion**

Nature of Services relating to services promoting investment, including promoting commerce, business opportunities, or financial growth.

### **8. NOSConsultant(Other)**

Nature of Services relating to services regarding consulting work unrelated to policy, such as strategic planning, technical advising, or operational guidance.

### **9. NOSPromotion(Other)**

Nature of Services relating to promotion services not directly tied to tourism, trade, or investment.

**10. NOSNoneReported**

Cases where no services were reported or where the filer marked the entry as “None Reported.”

**11. NOSDistributedMaterials**

Nature of Services relating to disseminating materials, including distributing printed materials, publications, or digital resources.

**12. NOSFundraising**

Nature of Services relating to fundraising efforts or soliciting donations.

**13. NOSMarketing/Advertising**

Nature of services focused on marketing and advertising, separate from public relations or media activities

**14. NOSLegal**

Nature of Services relating to legal work, such as case analysis, legal advising, or working with statutes and regulatory matters.

**15. NOSGovernmentRelations**

Nature of Services relating direct engagement with government officials, employees, or agencies, including meetings and ongoing communications.

**16. NOSOther(Uncategorized)**

Nature of Services that do not clearly fit into any of the defined categories above.

**Codebook: Semi-Annual Dataset**

<b>Variable</b>	<b>Label</b>	<b>Description</b>	<b>Type</b>	<b>Unique Values</b>	<b>Max, Min, Mean (if applicable)</b>	<b>Examples</b>
registration_number	Registration Number of Registrant from Semi-Annual Reports	Indicates the registration number of a registrant as reported in the DOJ semi-annual reports.	numeric	1993		“6082” “2165” “579”
DOJForeignPrincipal	Foreign Principal from the Semi-Annual Reports	Indicates the foreign principal affiliated with each registration number, as listed in the DOJ semi-annual reports. We found that some registrants’ foreign principals in the bulk data did not match what was reported in the DOJ reports.	string	3639		“Embassy of Morocco” “Kurdistan Regional Government” “Republic of India, Embassy”
registrant_name	Registrant name from the Semi-Annual Reports	Indicates the name of the registrant as reported in the semi-annual reports. We cross-referenced registrant names with the same registration numbers and have matched up the registrants appearing in both the semi-annual reports and the bulk data to ensure that no two agents have the same registration number.	string	2181		“Coyné Public Relations, LLC” “Hogan & Harston, L.L.P.” “Mayeroff, Jerry M.”
Year	Year of Semi-Annual	Indicates the year of each semi-annual report. Thus,	numeric	21	[2001,2021]	“2001” “2011”

	Report	both the Spring and Fall reports for a given year will be included. This variable will be useful if analyzing registrant data by full years.				“2020”
filename	Filename from the Semi-Annual Reports	Indicates which semi-annual report the registrant was reported in. This variable will be useful if analyzing registrant data by half-years.	string	42		“FARADec2009” “FARAJune2013”
Second_FPTerminationDate	Second Termination Date for Registrant	Some foreign principals found in the FARA bulk data had two termination dates. This variable serves to record the second termination dates, if applicable. In MM/DD/YYYY format.	string	20		“7/31/2009” “12/31/2015” “ ”
Second_FPRegistrationDate	Second Registration Date for Registrant	Some foreign principals found in the FARA bulk data had two registration dates. This variable serves to record the second registration dates, if applicable. In MM/DD/YYYY format.	string	28		“4/19/2001” “11/30/1998”
FPTerminationDate	Termination Date from Bulk Data	Indicates the termination date for a given foreign principal, if applicable, as listed in the FARA bulk data, in MM/DD/YYYY	string	1627		“10/1/2023” “10/15/2019” “ ”

		format.				
ForeignPrincipal	Foreign Principal from Bulk Data	Indicates the foreign principal affiliated with each registration number, as listed in the FARA bulk data. We found that some registrants' foreign principals in the bulk data did not match what was reported in the DOJ reports.	string	3288		“Embassy of Japan” “Government of Turkey, Embassy” “Korea Trade-Investment Promotion Agency”
FPRegistrationDate	Registration Date from Bulk Data	Indicates the registration date for a given foreign principal as listed in the FARA bulk data, in MM/DD/YYYY format.	string	2883		“8/1/2001” “5/20/2019”
CountryLocationRepresented	Country from Bulk Data	Indicates the country associated with each represented foreign principal in the FARA bulk data.	string	212		“IRAQ” “COTE D’IVOIRE (IVORY COAST)”
RegistrationNumber	Registration Number from Bulk Data	Indicates the registration number of a registrant as listed in the FARA bulk data.	string	1983		“616” “3492” “5680”
FPRegistrantDate	Registrant Date from Raw Bulk Data	Indicates the registration date for a registrant (agent) as listed in the raw FARA bulk data, in MM/DD/YYYY format.	string	1708		“7/2/1996” “12/2/2011” “9/13/1985”
FPRegistrantName	Registrant Name from Bulk Data	Indicates the registrant name as it appears in the FARA bulk data. We	string	1809		“Council of Khalistan” “Hill and Knowlton Strategies, LLC”

		cross-referenced registrant names with the same registration numbers and have matched up the registrants appearing in both the semi-annual reports and the bulk data to ensure that no two agents have the same registration number.				“Manatos & Manatos”
FPAddress1	Address Line 1 from Foreign Principal Bulk Data	Indicates the first line of the registrant’s address as listed in the FARA foreign principal bulk data. Some addresses appear to have not been sparse out, particularly addresses that are not American.	string	2894		“1571 Port Vila” “Palacio De Vidro, T A, Largo 4 De Fevereiro, CX P. 2223, Luanda Republic De Angola”
FPAddress2	Address Line 2 from Foreign Principal Bulk Data	Indicates the second line of the registrant’s address as listed in the FARA foreign principal bulk data, if applicable.	string	1166		“Vancouver, BC V6A 4C7” “2nd Floor” “Suite 650”
FPCity	City from Foreign Principal Bulk Data	Indicates the city of the registrant’s listed address as listed in the FARA foreign principal bulk data, if traditional American address.	string	370		“ ” “New York” “Boston” “Washington”
FPState	State from Foreign Principal Bulk	Indicates the state of the registrant’s listed address in the FARA foreign principal	string	23		“ ” “DC” “TX”

	Data	bulk data if traditional American address.				
FPZip	Zip Code from Foreign Principal Bulk Data	Indicates the zip code of the registrant's listed address in the FARA foreign principal bulk data if traditional American address.	string	127		“ ” “20001” “2210” “75024”
Registrant_Address1	Address Line 1 from All Registrants Bulk Data	Indicates the first line of the registrant's address as listed in the FARA all registrants bulk data. Some addresses appear to have not been sparse out, particularly addresses that are not American.	string	1638		“1571 Port Vila” “Palacio De Vidro, T A, Largo 4 De Fevereiro, CX P. 2223, Luanda Republic De Angola”
Registrant_Address2	Address Line 2 from All Registrants Bulk Data	Indicates the second line of the registrant's address as listed in the FARA all registrants bulk data, if applicable.	string	597		“Vancouver, BC V6A 4C7” “2nd Floor” “Suite 650”
Registrant_City	City from All Registrants Bulk Data	Indicates the city of the registrant's listed address as listed in the FARA all registrants bulk data, if traditional American address.	string	389		“ ” “New York” “Boston” “Washington”
Registrant_State	State from All Registrants Bulk Data	Indicates the state of the registrant's listed address in the FARA all registrants bulk data if traditional American address.	string	50		“ ” “DC” “TX”

Registrant_Zip	Zip Code from All Registrants Bulk Data	Indicates the zip code of the registrant's listed address in the FARA all registrants bulk data if traditional American address.	string	694		“ ” “20001” “2210” “75024”
RegistrationDate	Registration Date of Registrant from Bulk Data	Indicates the registration date for a registrant (agent) in the cleaned FARA bulk data, in MM/DD/YYYY format.	string	1708		“7/2/1996” “12/2/2011” “5/10/2001”
TerminationDate	Termination Date of Registrant from Bulk Data	Indicates the termination date for a registrant (agent) as listed in the FARA bulk data, in MM/DD/YYYY format, if applicable.	string	914		“ ” “3/15/2010” “8/31/2023”
Name	Name from Bulk Data	Indicates the name of the registrant from the FARA bulk data.	string	1809		“Council of Khalistan” “Hill and Knowlton Strategies, LLC”
BusinessName	Business Name from Bulk Data	Indicates the business name of the registrant from the FARA bulk data, if a business name is present.	string	66		“ ” “LS2group” “TENEX-USA, Inc.”
TerminationYear	Termination Year from the Bulk Data	Indicates the year of termination for a registrant as listed in the FARA bulk data, if applicable.	Numeric (int)	29	[1993,2024]	“2021” “2019” “ ”
FPRegistrationYear	Foreign Principal Registration Year from the	Indicates the year of registration for a given foreign principal as listed in the FARA bulk data.	Numeric (int)	73	[1943,2025]	“1999” “2004” “2019”

	Bulk Data					
FPTerminationYear	Foreign Principal Termination Year from the Bulk Data	Indicates the year of termination for a given foreign principal as listed in the FARA bulk data, if applicable.	Numeric (int)	34	[1974,2025]	“2023” “2020” “2010” “.”
RegistrationYear	Registration Year from the Bulk Data	Indicates the year of registration for a registrant as listed in the FARA bulk data.	Numeric (int)	72	[1943,2021]	“1995” “2001” “2018”
RegistrationMonth	Registration Month from the Bulk Data	Indicates the month of registration for a registrant as listed in the FARA bulk data.	Numeric (byte)	12	[1,12]	“12” “6” “8”
FPRegistrationMonth	Foreign Principal Registration Month from the Bulk Data	Indicates the month of registration for a given foreign principal as listed in the FARA bulk data.	Numeric (byte)	12	[1,12]	“6” “5” “11”
TerminationMonth	Termination Month from the Bulk Data	Indicates the month of termination for a registrant, if applicable, as listed in the FARA bulk data.	Numeric (byte)	12	[1,12]	“12” “9” “.”
FPTerminationMonth	Foreign Principal Termination Month from the Bulk Data	Indicates the month of termination for a given foreign principal, if applicable, as listed in the FARA bulk data.	Numeric (byte)	12	[1,12]	“3” “11” “.”
AppendixA	Appendix A	Indicates whether or not the	Numeric	2	[0,1]	“0”

	from the Semi-Annual Reports	registrant appears in Appendix A of a semi-annual report.	(float)			“1”
registration_terminated	Registration Terminated from the Semi-Annual Reports	Indicates whether or not the registration was terminated based on the semi-annual reports.	Numeric (float)	2	[0,1]	“0” “1”
DOJcountry	DOJ Country from the Semi-Annual Reports	Indicates the country associated with each foreign principal in the semi-annual reports.	string	216		“DENMARK” “IRELAND” “MALAYSIA”
DOJAddress	DOJ Address from the Semi-Annual Reports	Indicates the address listed for each registration in the semi-annual reports.	string	3584		“1220 L Street, N.W. Suite 411 Washington, DC 20005” “655 Third Avenue, 18th Floor Suite 1810 New York, NY 10017”
Nature_of_Services	Nature of Services from the Semi-Annual Reports	Records the nature of service categories as self-reported in the semi-annual reports. This variable will be used to help categorize the kind of work being done by registrants on behalf of foreign principals.	string	79		“Lobbying” “Public Relations” “Promotion of Tourism”
Activities	Activities from the Semi-Annual Reports	The descriptions of registrant activities as self-reported in the semi-annual reports. These activities will be used to help show the kind of work	string	9615		"The registrant provided public relations services to the foreign principal which included coordinating monthly

		being done by registrants on behalf of the foreign principals.				teleconferences, visits by U.S. journalists to Brazil and interviews by U.S. journalists. The registrant also coordinated the participation of Brazilian officials at events and conferences."
Finances	Finances from the Semi-Annual Reports	Gives the actual financial description given by each registrant, according to the DOJ semi-annual reports. We noted that some reported Finances indicate different reporting periods.	string	15408		"None Reported" "\$888,337.25 for the six month period ending June 30, 2005" "\$2,584,743.60 for the six month period ending March 31, 2014" "All monies reported under International Business Organization of Osaka"
finances	Value of Finances from the Semi-Annual Reports	The numerical financial value indicated in the registrant's reporting. This variable will be numerical if a value is reported. If a registrant's Finances = None Reported, this variable is coded with a "0".	Numeric (double)	10544	[0,89000000]  Mean: 417615	"10750000" "6752617.5" "0"
FP_terminated	Foreign Principal Terminated	Indicates whether or not a foreign principal has been terminated. If FP_terminated	Numeric (float)	2	[0,1]	"0" "1"

	from the Semi-Annual Reports	= 1, the foreign principal has been terminated.				
found_in_bulkdata	Registrants from Semi-Annual Reports in Bulk Data	Indicates the registrants that are in the DOJ semi-annual reports and also the FARA bulk data. found_in_bulkdata = 1 indicates the registrants not found in the FARA bulk data, but are in the DOJ semi-annual reports. found_in_bulkdata = 2 indicates registrants that are found in both.	Numeric (float)	2	[0,1]	“1” “2”
ActProvidedCounsel	Activity Category for Providing Counsel	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that include providing counsel or related activities	Numeric (float)	2	[0,1]	“0” “1”
ActPublicRelations	Activity Category for Public Relations	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that include public relations services or related activities	Numeric (float)	2	[0,1]	“0” “1”
ActConsulting	Activity Category for Consulting	Team-created variable showing the percentage of activities reported in	Numeric (float)	2	[0,1]	“0” “1”

		semi-annual reports from 2000-2021 that include consulting services or related activities				
ActGovernmentEngagement	Activity Category for Government Engagement	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that include government engagement or related activities	Numeric (float)	2	[0,1]	“0” “1”
ActMediaRelations	Activity Category for Media Relations	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that include media relations or related activities	Numeric (float)	2	[0,1]	“0” “1”
ActMaterialDissemination	Activity Category for Material Dissemination	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that include disseminating materials	Numeric (float)	2	[0,1]	“0” “1”
ActLegal	Activity Category for Legal Work	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that include legal work and related activities	Numeric (float)	2	[0,1]	“0” “1”
ActResearch	Activity	Team-created variable	Numeric	2	[0,1]	“0”

	Category for Research	showing the percentage of activities reported in semi-annual reports from 2000-2021 that include research or related activities	(float)			“1”
ActNoneReported	Activity Category for No Activities Reported	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that state “None Reported” or claim that no services were performed	Numeric (float)	2	[0,1]	“0” “1”
ActEvents	Activity Category for Events	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that include organizing events, hosting events, or related activities	Numeric (float)	2	[0,1]	“0” “1”
ActTravel	Activity Category for Travel	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that include activities related to travel	Numeric (float)	2	[0,1]	“0” “1”
ActTradePromotion	Activity Category for Promotion of Trade	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that include promoting trade or related activities	Numeric (float)	2	[0,1]	“0” “1”

ActForeignAffairs	Activity Category for Foreign Affairs	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that include activities related to foreign affairs	Numeric (float)	2	[0,1]	“0” “1”
ActUSPolicyConsultant	Activity Category for US Policy Consultation	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that include US policy consultation or related activities	Numeric (float)	2	[0,1]	“0” “1”
ActPromotedTourism	Activity Category for Promotion of Tourism	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that include promoting tourism in a region or related activities	Numeric (float)	2	[0,1]	“0” “1”
ActFilmPromotion	Activity Category for Film Promotion	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that include promoting films	Numeric (float)	2	[0,1]	“0” “1”
ActReceivedMoney	Activity Category for Monetary Transactions	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that include	Numeric (float)	2	[0,1]	“0” “1”

		monetary transactions or related activities				
ActBusinessPromotion	Activity Category for Business Promotion	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that include promoting business(es) for a region or related activities	Numeric (float)	2	[0,1]	“0” “1”
ActMissing	Activity Category for Missing Activities	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that were blank or were entered as “Inactive” or “Not Finalized”	Numeric (float)	2	[0,1]	“0” “1”
ActAdvocacy	Activity Category for Advocacy	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that include advocacy efforts	Numeric (float)	2	[0,1]	“0” “1”
ActCulturalExchange	Activity Category for Cultural Exchange	Team-created variable showing the percentage of activities reported in semi-annual reports from 2000-2021 that include activities related to cultural exchange	Numeric (float)	2	[0,1]	“0” “1”
ActOther	Activity Category for	Team-created variable showing the percentage of	Numeric (float)	2	[0,1]	“0” “1”

	Other	activities reported in semi-annual reports from 2000-2021 that do not fall into one of the other listed categories				
NOSLobbying	Nature of Services Category for Lobbying	Team-created variable showing the percentage of natures of services reported in semi-annual reports from 2000-2021 that include lobbying or related services	Numeric (float)	2	[0,1]	“0” “1”
NOSPublicRelations	Nature of Services Category for Public Relations	Team-created variable showing the percentage of natures of services reported in semi-annual reports from 2000-2021 that include public relations, press releases, or related services	Numeric (float)	2	[0,1]	“0” “1”
NOSPromotedTourism	Nature of Services Category for Promotion of Tourism	Team-created variable showing the percentage of natures of services reported in semi-annual reports from 2000-2021 that include promoting tourism or related services	Numeric (float)	2	[0,1]	“0” “1”
NOSUSPolicyConsultant	Nature of Services Category for US Policy Consultation	Team-created variable showing the percentage of natures of services reported in semi-annual reports from 2000-2021 that include US policy consultation or related services	Numeric (float)	2	[0,1]	“0” “1”

NOSTradePromotion	Nature of Services Category for Promotion of Trade	Team-created variable showing the percentage of natures of services reported in semi-annual reports from 2000-2021 that include promoting trade or related services	Numeric (float)	2	[0,1]	“0” “1”
NOSMediaRelations	Nature of Services Category for Media Relations	Team-created variable showing the percentage of natures of services reported in semi-annual reports from 2000-2021 that include media relations or related services	Numeric (float)	2	[0,1]	“0” “1”
NOSInvestmentPromotion	Nature of Services Category for Investment Promotion	Team-created variable showing the percentage of natures of services reported in semi-annual reports from 2000-2021 that include promoting investment or related services	Numeric (float)	2	[0,1]	“0” “1”
NOSConsultantOther	Nature of Services Category for Consultation on Non-Policy Matters	Team-created variable showing the percentage of natures of services reported in semi-annual reports from 2000-2021 that include consultation outside of policy matters	Numeric (float)	2	[0,1]	“0” “1”
NOSPromotionOther	Nature of Services Category for Promotion of	Team-created variable showing the percentage of natures of services reported in semi-annual reports from	Numeric (float)	2	[0,1]	“0” “1”

	Other Industries	2000-2021 that include promoting industries other than tourism, trade, and investment				
NOSNoneReported	Nature of Services Category for None Reported	Team-created variable showing the percentage of natures of services reported in semi-annual reports from 2000-2021 that claim no services were performed or are labeled “None Reported”	Numeric (float)	2	[0,1]	“0” “1”
NOSDistributedMaterials	Nature of Services Category for Distributed Materials	Team-created variable showing the percentage of natures of services reported in semi-annual reports from 2000-2021 that include disseminating materials	Numeric (float)	2	[0,1]	“0” “1”
NOSFundraising	Nature of Services Category for Fundraising	Team-created variable showing the percentage of natures of services reported in semi-annual reports from 2000-2021 that include fundraising efforts	Numeric (float)	2	[0,1]	“0” “1”
NOSMarketingAdvertising	Nature of Services Category for Marketing and Advertising	Team-created variable showing the percentage of natures of services reported in semi-annual reports from 2000-2021 that include marketing and advertising efforts that are not media relations or press releases	Numeric (float)	2	[0,1]	“0” “1”

NOSLegal	Nature of Services Category for Legal Work	Team-created variable showing the percentage of natures of services reported in semi-annual reports from 2000-2021 that include legal work or related services	Numeric (float)	2	[0,1]	“0” “1”
NOSGovernmentRelations	Nature of Services Category for Government Relations	Team-created variable showing the percentage of natures of services reported in semi-annual reports from 2000-2021 that include government relations or related services	Numeric (float)	2	[0,1]	“0” “1”
NOSOther	Nature of Services Category for Other Services	Team-created variable showing the percentage of natures of services reported in semi-annual reports from 2000-2021 that do not fall into the other specified categories	Numeric (float)	2	[0,1]	“0” “1”
administration	Presidential Administration	Team-created categorical variable showing which records were reported during which presidential administration, where 1=Bush1, 2=Bush2, 3=Obama1, 4=Obama2	Numeric (float)	6	[1,6]	“1” “2” “4”
ObamaAll	Records Reported During Either Obama Term	Team-created categorical variable indicating which records were reported during either Obama term, with 0=(Not during the Obama	Numeric (float)	2	[0,1]	“0” “1”

		Administration) and 1=(During the Obama Administration)				
BushAll	Records Reported During Either Bush 43 Term	Team-created categorical variable indicating which records were reported during either Bush term, with 0=(Not during the Bush Administration) and 1=(During the Bush Administration)	Numeric (float)	2	[0,1]	“0” “1”
Biden	Records Reported During the Biden Administration	Team-created categorical variable indicating which records were reported during the Biden Administration, with 0=(Not during the Biden Administration) and 1=(During the Biden Administration)	Numeric (float)	2	[0,1]	“0” “1”
Trump1	Records Reported During the First Trump Term	Team-created categorical variable indicating which records were reported during the first Trump term, with 0=(Not during the first Trump Administration) and 1=(During the first Trump Administration)	Numeric (float)	2	[0,1]	“0” “1”
Obama2	Records Reported During the Second Obama Term	Team-created categorical variable indicating which records were reported during the second Obama term, with 0=(Not during the	Numeric (float)	2	[0,1]	“0” “1”

		second Obama term) and 1=(During the second Obama term)				
Obama1	Records Reported During the First Obama Term	Team-created categorical variable indicating which records were reported during the first Obama term, with 0=(Not during the first Obama term) and 1=(During the first Obama term)	Numeric (float)	2	[0,1]	“0” “1”
Bush2	Records Reported During the Second Bush Term	Team-created categorical variable indicating which records were reported during the second Bush term, with 0=(Not during the second Bush term) and 1=(During the second Bush term)	Numeric (float)	2	[0,1]	“0” “1”
Bush1	Records Reported During the First Bush Term	Team-created categorical variable indicating which records were reported during the first Bush term, with 0=(Not during the first Bush term) and 1=(During the first Bush term)	Numeric (float)	2	[0,1]	“0” “1”
NewState	State Abbreviation	Team-created variable for the state listed in the foreign agent’s reported address. If not located in a US state, “Foreign Country Address” is recorded	String (str23)	50		“DC” “NY” “Foreign Country Address”

**Codebook: Master Annual Dataset**

Variable	Label	Description	Type	Unique Values	Max, Min, Mean (if applicable)	Examples
Year	Year of Semi-Annual Report	Indicates the year of each semi-annual report. Thus, both the Spring and Fall reports for a given year will be included. This variable will be useful if analyzing registrant data by full years.	numeric	24	[2001,2024]	“2001” “2011” “2020”
FPTerminationDate	Termination Date from Bulk Data	Indicates the termination date for a given foreign principal, if applicable, as listed in the FARA bulk data, in MM/DD/YYYY format.	string	6383		“10/1/2023” “10/15/2019” “ ”
ForeignPrincipal	Foreign Principal from Bulk Data	Indicates the foreign principal affiliated with each registration number, as listed in the FARA bulk data. We found that some registrants’ foreign principals in the bulk data did not match what was reported in the DOJ reports.	string	3789		“Embassy of Japan” “Government of Turkey, Embassy” “Korea Trade-Investment Promotion Agency”
FPRegistrationDate	Registration Date from Bulk Data	Indicates the registration date for a given foreign principal as listed in the FARA bulk data, in MM/DD/YYYY format.	string	2737		“8/1/2001” “5/20/2019”
CountryLocationRe	Country from	Indicates the country	string	219		“IRAQ”

presented	Bulk Data	associated with each represented foreign principal in the FARA bulk data.				“COTE D’IVOIRE (IVORY COAST)”
RegistrationNumber	Registration Number from Bulk Data	Indicates the registration number of a registrant as listed in the FARA bulk data.	string	1854		“616” “3492” “5680”
FPRegistrantDate	Registration Date from Bulk Data	Indicates the registration date for a registrant (agent) as listed in the raw FARA bulk data, in MM/DD/YYYY format.	string	1646		“7/2/1996” “12/2/2011” “9/13/1985”
FPRegistrantName	Registrant Name from Bulk Data	Indicates the registrant name as it appears in the FARA bulk data. We cross-referenced registrant names with the same registration numbers and have matched up the registrants appearing in both the semi-annual reports and the bulk data to ensure that no two agents have the same registration number.	string	1714		“Council of Khalistan” “Hill and Knowlton Strategies, LLC” “Manatos & Manatos”
FPAddress1	Address Line 1 from Foreign Principal Bulk Data	Indicates the first line of the registrant’s address as listed in the FARA foreign principal bulk data. Some addresses appear to have not been sparse out, particularly addresses that are not	string	2911		“1571 Port Vila” “Palacio De Vidro, T A, Largo 4 De Fevereiro, CX P. 2223, Luanda Republic De Angola”

		American.				
FPAddress2	Address Line 2 from Foreign Principal Bulk Data	Indicates the second line of the registrant's address as listed in the FARA foreign principal bulk data, if applicable.	string	1089		"Vancouver, BC V6A 4C7" "2nd Floor" "Suite 650"
FPCity	City from Foreign Principal Bulk Data	Indicates the city of the registrant's listed address as listed in the FARA foreign principal bulk data, if traditional American address.	string	534		" " "New York" "Boston" "Washington"
FPState	State from Foreign Principal Bulk Data	Indicates the state of the registrant's listed address in the FARA foreign principal bulk data if traditional American address.	string	26		" " "DC" "TX"
FPZip	Zip Code from Foreign Principal Bulk Data	Indicates the zip code of the registrant's listed address in the FARA foreign principal bulk data if traditional American address.	string	141		" " "20001" "2210" "75024"
Registrant_Address1	Address Line 1 from All Registrants Bulk Data	Indicates the first line of the registrant's address as listed in the FARA all registrants bulk data. Some addresses appear to have not been sparse out, particularly addresses that are not American.	string	1589		"1571 Port Vila" "Palacio De Vidro, T A, Largo 4 De Fevereiro, CX P. 2223, Luanda Republic De Angola"

Registrant_Address2	Address Line 2 from All Registrants Bulk Data	Indicates the second line of the registrant's address as listed in the FARA all registrants bulk data, if applicable.	string	557		"Vancouver, BC V6A 4C7" "2nd Floor" "Suite 650"
Registrant_City	City from All Registrants Bulk Data	Indicates the city of the registrant's listed address as listed in the FARA all registrants bulk data, if traditional American address.	string	428		" " "New York" "Boston" "Washington"
Registrant_State	State from All Registrants Bulk Data	Indicates the state of the registrant's listed address in the FARA all registrants bulk data if traditional American address.	string	48		" " "DC" "TX"
Registrant_Zip	Zip Code from All Registrants Bulk Data	Indicates the zip code of the registrant's listed address in the FARA all registrants bulk data if traditional American address.	string	690		" " "20001" "2210" "75024"
RegistrationDate	Registration Date of Registrant from Bulk Data	Indicates the registration date for a registrant (agent) in the cleaned FARA bulk data, in MM/DD/YYYY format.	string	1646		"7/2/1996" "12/2/2011" "5/10/2001"
TerminationDate	Termination Date of Registrant from Bulk Data	Indicates the termination date for a registrant (agent) as listed in the FARA bulk data, in MM/DD/YYYY format, if applicable.	string	848		" " "3/15/2010" "8/31/2023"

Name	Name from Bulk Data	Indicates the name of the registrant from the FARA bulk data.	string	1714		“Council of Khalistan” “Hill and Knowlton Strategies, LLC”
BusinessName	Business Name from Bulk Data	Indicates the business name of the registrant from the FARA bulk data, if a business name is present.	string	57		“ ” “LS2group” “TENEX-USA, Inc.”
TerminationYear	Termination Year from the Bulk Data	Indicates the year of termination for a registrant as listed in the FARA bulk data, if applicable.	Numeric (int)	25	[2001,2025]	“2021” “2019” “ ” “ ”
FPRegistrationYear	Foreign Principal Registration Year from the Bulk Data	Indicates the year of registration for a given foreign principal as listed in the FARA bulk data.	Numeric (int)	71	[1943,2024]	“1999” “2004” “2019”
FPTerminationYear	Foreign Principal Termination Year from the Bulk Data	Indicates the year of termination for a given foreign principal as listed in the FARA bulk data, if applicable.	Numeric (int)	25	[2001,2025]	“2023” “2020” “2010” “ ” “ ”
RegistrationYear	Registration Year from the Bulk Data	Indicates the year of registration for a registrant as listed in the FARA bulk data.	Numeric (int)	74	[1943,2024]	“1995” “2001” “2018”
RegistrationMonth	Registration Month from the Bulk Data	Indicates the month of registration for a registrant as listed in the FARA bulk data.	Numeric (byte)	12	[1,12]	“12” “6” “8”

FPRegistrationMonth	Foreign Principal Registration Month from the Bulk Data	Indicates the month of registration for a given foreign principal as listed in the FARA bulk data.	Numeric (byte)	12	[1,12]	“6” “5” “11”
TerminationMonth	Termination Month from the Bulk Data	Indicates the month of termination for a registrant, if applicable, as listed in the FARA bulk data.	Numeric (byte)	12	[1,12]	“12” “9” “.”
FPTerminationMonth	Foreign Principal Termination Month from the Bulk Data	Indicates the month of termination for a given foreign principal, if applicable, as listed in the FARA bulk data.	Numeric (byte)	12	[1,12]	“3” “11” “.”
found_in_bulkdata	Registrants from Semi-Annual Reports in Bulk Data	Indicates the registrants that are in the DOJ semi-annual reports and also the FARA bulk data. found_in_bulkdata = 1 indicates the registrants not found in the FARA bulk data, but are in the DOJ semi-annual reports. found_in_bulkdata = 2 indicates registrants that are found in both.	Numeric (float)	2	[0,1]	“1” “2”
DOJFile	File Name and Year for Bulk Data	Team-created variable for the Master Bulk Data files that identifies the Bulk Data and the respective Year you are examining	String (str10)	24		“Annual1967” “Annual2001” “Spring2020” “Fall1945”

After running the code for sorting foreign principals and assigning government affiliation:

FPcategory	Category of Foreign Principal Affiliation	Team-created categorical variable for the category in which each foreign principal listed in the FARA Bulk Data falls, where 1=Administrative Government, 2=Commercial (unspecified), 3=Tourism, 4=Media, 5=Individuals, 6=Education/Research, 7=Advocacy, 8=Political Parties, 9=Political Entities, 10=Labor/Industry Associations, 11=Investment/Development/Wealth, 12=Other	Numeric (float)	12	[1,12]	“1” “2” “3”
govaff	Indicator of Government Affiliation	Team-created binary variable to indicate whether or not a foreign principal is government-affiliated, where 0= No Government Affiliation and 1= Government Affiliation. Government affiliation consists of any government influence or ownership.	Numeric (float)	2	[0,1]	“0” “1”

**Codebook: Master Spring Dataset**

Variable	Label	Description	Type	Unique Values	Max, Min, Mean (if applicable)	Examples
registration_number	Registration Number of Registrant from Semi-Annual Reports	Indicates the registration number of a registrant as reported in the DOJ semi-annual reports.	numeric	1717		“6082” “2165” “579”
DOJForeignPrincipal	Foreign Principal from the Semi-Annual Reports	Indicates the foreign principal affiliated with each registration number, as listed in the DOJ semi-annual reports. We found that some registrants’ foreign principals in the bulk data did not match what was reported in the DOJ reports.	string	2957		“Embassy of Morocco” “Kurdistan Regional Government” “Republic of India, Embassy”
registrant_name	Registrant name from the Semi-Annual Reports	Indicates the name of the registrant as reported in the semi-annual reports. We cross-referenced registrant names with the same registration numbers and have matched up the registrants appearing in both the semi-annual reports and the bulk data to ensure that no two agents have the same registration number.	string	1849		“Coynes Public Relations, LLC” “Hogan & Harston, L.L.P.” “Mayeroff, Jerry M.”
Year	Year of Semi-Annual	Indicates the year of each semi-annual report. Thus,	numeric	82	[1943,2024]	“2001” “2011”

	Report	both the Spring and Fall reports for a given year will be included. This variable will be useful if analyzing registrant data by full years.				“2020”
filename	Filename from the Semi-Annual Reports	Indicates which semi-annual report the registrant was reported in. This variable will be useful if analyzing registrant data by half-years.	string	21		“FARADec2009” “FARAJune2013”
Second_FPTerminationDate	Second Termination Date for Registrant	Some foreign principals found in the FARA bulk data had two termination dates. This variable serves to record the second termination dates, if applicable. In MM/DD/YYYY format.	string	10		“7/31/2009” “12/31/2015” “ ”
Second_FPRegistrationDate	Second Registration Date for Registrant	Some foreign principals found in the FARA bulk data had two registration dates. This variable serves to record the second registration dates, if applicable. In MM/DD/YYYY format.	string	17		“4/19/2001” “11/30/1998”
FPTerminationDate	Termination Date from Bulk Data	Indicates the termination date for a given foreign principal, if applicable, as listed in the FARA bulk data, in MM/DD/YYYY	string	5861		“10/1/2023” “10/15/2019” “ ”

		format.				
ForeignPrincipal	Foreign Principal from Bulk Data	Indicates the foreign principal affiliated with each registration number, as listed in the FARA bulk data. We found that some registrants' foreign principals in the bulk data did not match what was reported in the DOJ reports.	string	11091		"Embassy of Japan" "Government of Turkey, Embassy" "Korea Trade-Investment Promotion Agency"
FPRegistrationDate	Registration Date from Bulk Data	Indicates the registration date for a given foreign principal as listed in the FARA bulk data, in MM/DD/YYYY format.	string	8466		"8/1/2001" "5/20/2019"
CountryLocationRepresented	Country from Bulk Data	Indicates the country associated with each represented foreign principal in the FARA bulk data.	string	262		"IRAQ" "COTE D'IVOIRE (IVORY COAST)"
RegistrationNumber	Registration Number from Bulk Data	Indicates the registration number of a registrant as listed in the FARA bulk data.	string	6203		"616" "3492" "5680"
FPRegistrantDate	Registration Date from Bulk Data	Indicates the registration date for a registrant (agent) as listed in the raw FARA bulk data, in MM/DD/YYYY format.	string	4987		"7/2/1996" "12/2/2011" "9/13/1985"
FPRegistrantName	Registrant Name from Bulk Data	Indicates the registrant name as it appears in the FARA bulk data. We	string	5643		"Council of Khalistan" "Hill and Knowlton Strategies, LLC"

		cross-referenced registrant names with the same registration numbers and have matched up the registrants appearing in both the semi-annual reports and the bulk data to ensure that no two agents have the same registration number.				“Manatos & Manatos”
FPAddress1	Address Line 1 from Foreign Principal Bulk Data	Indicates the first line of the registrant’s address as listed in the FARA foreign principal bulk data. Some addresses appear to have not been sparse out, particularly addresses that are not American.	string	4346		“1571 Port Vila” “Palacio De Vidro, T A, Largo 4 De Fevereiro, CX P. 2223, Luanda Republic De Angola”
FPAddress2	Address Line 2 from Foreign Principal Bulk Data	Indicates the second line of the registrant’s address as listed in the FARA foreign principal bulk data, if applicable.	string	1123		“Vancouver, BC V6A 4C7” “2nd Floor” “Suite 650”
FPCity	City from Foreign Principal Bulk Data	Indicates the city of the registrant’s listed address as listed in the FARA foreign principal bulk data, if traditional American address.	string	517		“ ” “New York” “Boston” “Washington”
FPState	State from Foreign Principal Bulk	Indicates the state of the registrant’s listed address in the FARA foreign principal	string	40		“ ” “DC” “TX”

	Data	bulk data if traditional American address.				
FPZip	Zip Code from Foreign Principal Bulk Data	Indicates the zip code of the registrant's listed address in the FARA foreign principal bulk data if traditional American address.	string	142		“ ” “20001” “2210” “75024”
Registrant_Address1	Address Line 1 from All Registrants Bulk Data	Indicates the first line of the registrant's address as listed in the FARA all registrants bulk data. Some addresses appear to have not been sparse out, particularly addresses that are not American.	string	4428		“1571 Port Vila” “Palacio De Vidro, T A, Largo 4 De Fevereiro, CX P. 2223, Luanda Republic De Angola”
Registrant_Address2	Address Line 2 from All Registrants Bulk Data	Indicates the second line of the registrant's address as listed in the FARA all registrants bulk data, if applicable.	string	1415		“Vancouver, BC V6A 4C7” “2nd Floor” “Suite 650”
Registrant_City	City from All Registrants Bulk Data	Indicates the city of the registrant's listed address as listed in the FARA all registrants bulk data, if traditional American address.	string	778		“ ” “New York” “Boston” “Washington”
Registrant_State	State from All Registrants Bulk Data	Indicates the state of the registrant's listed address in the FARA all registrants bulk data if traditional American address.	string	51		“ ” “DC” “TX”

Registrant_Zip	Zip Code from All Registrants Bulk Data	Indicates the zip code of the registrant's listed address in the FARA all registrants bulk data if traditional American address.	string	1360		“ ” “20001” “2210” “75024”
RegistrationDate	Registration Date of Registrant from Bulk Data	Indicates the registration date for a registrant (agent) in the cleaned FARA bulk data, in MM/DD/YYYY format.	string	4987		“7/2/1996” “12/2/2011” “5/10/2001”
TerminationDate	Termination Date of Registrant from Bulk Data	Indicates the termination date for a registrant (agent) as listed in the FARA bulk data, in MM/DD/YYYY format, if applicable.	string	3914		“ ” “3/15/2010” “8/31/2023”
Name	Name from Bulk Data	Indicates the name of the registrant from the FARA bulk data.	string	5639		“Council of Khalistan” “Hill and Knowlton Strategies, LLC”
BusinessName	Business Name from Bulk Data	Indicates the business name of the registrant from the FARA bulk data, if a business name is present.	string	191		“ ” “LS2group” “TENEX-USA, Inc.”
TerminationYear	Termination Year from the Bulk Data	Indicates the year of termination for a registrant as listed in the FARA bulk data, if applicable.	Numeric (int)	82	[1943,2024]	“2021” “2019” “ ”
FPRegistrationYear	Foreign Principal Registration Year from the	Indicates the year of registration for a given foreign principal as listed in the FARA bulk data.	Numeric (int)	83	[1942,2024]	“1999” “2004” “2019”

	Bulk Data					
FPTerminationYear	Foreign Principal Termination Year from the Bulk Data	Indicates the year of termination for a given foreign principal as listed in the FARA bulk data, if applicable.	Numeric (int)	83	[1943,2025]	“2023” “2020” “2010” “.”
RegistrationYear	Registrant Year from the Bulk Data	Indicates the year of registration for a registrant as listed in the FARA bulk data.	Numeric (int)	83	[1942,2024]	“1995” “2001” “2018”
RegistrationMonth	Registration Month from the Bulk Data	Indicates the month of registration for a registrant as listed in the FARA bulk data.	Numeric (byte)	12	[1,12]	“12” “6” “8”
FPRegistrationMonth	Foreign Principal Registration Month from the Bulk Data	Indicates the month of registration for a given foreign principal as listed in the FARA bulk data.	Numeric (byte)	12	[1,12]	“6” “5” “11”
TerminationMonth	Termination Month from the Bulk Data	Indicates the month of termination for a registrant, if applicable, as listed in the FARA bulk data.	Numeric (byte)	12	[1,12]	“12” “9” “.”
FPTerminationMonth	Foreign Principal Termination Month from the Bulk Data	Indicates the month of termination for a given foreign principal, if applicable, as listed in the FARA bulk data.	Numeric (byte)	12	[1,12]	“3” “11” “.”
AppendixA	Appendix A	Indicates whether or not the	Numeric	2	[0,1]	“0”

	from the Semi-Annual Reports	registrant appears in Appendix A of a semi-annual report.	(float)			“1”
registration_terminated	Registration Terminated from the Semi-Annual Reports	Indicates whether or not the registration was terminated based on the semi-annual reports.	Numeric (float)	2	[0,1]	“0” “1”
DOJcountry	DOJ Country from the Semi-Annual Reports	Indicates the country associated with each foreign principal in the semi-annual reports.	string	232		“DENMARK” “IRELAND” “MALAYSIA”
DOJAddress	DOJ Address from the Semi-Annual Reports	Indicates the address listed for each registration in the semi-annual reports.	string	2718		“1220 L Street, N.W. Suite 411 Washington, DC 20005” “655 Third Avenue, 18th Floor Suite 1810 New York, NY 10017”
Nature_of_Services	Nature of Services from the Semi-Annual Reports	Records the nature of service categories as self-reported in the semi-annual reports. This variable will be used to help categorize the kind of work being done by registrants on behalf of foreign principals.	string	97		“Lobbying” “Public Relations” “Promotion of Tourism”
Activities	Activities from the Semi-Annual Reports	The descriptions of registrant activities as self-reported in the semi-annual reports. These activities will be used to help show the kind of work	string	5966		"The registrant provided public relations services to the foreign principal which included coordinating monthly

		being done by registrants on behalf of the foreign principals.				teleconferences, visits by U.S. journalists to Brazil and interviews by U.S. journalists. The registrant also coordinated the participation of Brazilian officials at events and conferences."
Finances	Finances from the Semi-Annual Reports	Gives the actual financial description given by each registrant, according to the DOJ semi-annual reports. We noted that some reported Finances indicate different reporting periods.	string	7508		"None Reported" "\$888,337.25 for the six month period ending June 30, 2005" "\$2,584,743.60 for the six month period ending March 31, 2014" "All monies reported under International Business Organization of Osaka"
finances	Value of Finances from the Semi-Annual Reports	The numerical financial value indicated in the registrant's reporting. This variable will be numerical if a value is reported. If a registrant's Finances = None Reported, this variable is coded with a "0".	Numeric (double)	5247	[0,47556357]  Mean: 454057	"10750000" "6752617.5" "0"
FP_terminated	Foreign Principal Terminated	Indicates whether or not a foreign principal has been terminated. If FP_terminated	Numeric (float)	2	[0,1]	"0" "1"

	from the Semi-Annual Reports	= 1, the foreign principal has been terminated.				
found_in_bulkdata	Registrants from Semi-Annual Reports in Bulk Data	Indicates the registrants that are in the DOJ semi-annual reports and also the FARA bulk data. found_in_bulkdata = 1 indicates the registrants not found in the FARA bulk data, but are in the DOJ semi-annual reports. found_in_bulkdata = 2 indicates registrants that are found in both.	Numeric (float)	2	[0,1]	“1” “2”
DOJFile	File Name and Year for Bulk Data	Team-created variable for the Master Bulk Data files that identifies the Bulk Data and the respective Year you are examining	String (str10)	82		“Annual1967” “Annual2001” “Spring2020” “Fall1945”

**Codebook: Master Fall Dataset**

Variable	Label	Description	Type	Unique Values	Max, Min, Mean (if applicable)	Examples
registration_number	Registration Number of Registrant from Semi-Annual Reports	Indicates the registration number of a registrant as reported in the DOJ semi-annual reports.	numeric	1730		“6082” “2165” “579”
DOJForeignPrincipal	Foreign Principal from the Semi-Annual Reports	Indicates the foreign principal affiliated with each registration number, as listed in the DOJ semi-annual reports. We found that some registrants’ foreign principals in the bulk data did not match what was reported in the DOJ reports.	string	3015		“Embassy of Morocco” “Kurdistan Regional Government” “Republic of India, Embassy”
registrant_name	Registrant name from the Semi-Annual Reports	Indicates the name of the registrant as reported in the semi-annual reports. We cross-referenced registrant names with the same registration numbers and have matched up the registrants appearing in both the semi-annual reports and the bulk data to ensure that no two agents have the same registration number.	string	1811		“Coyné Public Relations, LLC” “Hogan & Harston, L.L.P.” “Mayeroff, Jerry M.”
Year	Year of Semi-Annual	Indicates the year of each semi-annual report. Thus,	numeric	82	[1943,2024]	“2001” “2011”

	Report	both the Spring and Fall reports for a given year will be included. This variable will be useful if analyzing registrant data by full years.				“2020”
filename	Filename from the Semi-Annual Reports	Indicates which semi-annual report the registrant was reported in. This variable will be useful if analyzing registrant data by half-years.	string	21		“FARADec2009” “FARAJune2013”
Second_FPTerminationDate	Second Termination Date for Registrant	Some foreign principals found in the FARA bulk data had two termination dates. This variable serves to record the second termination dates, if applicable. In MM/DD/YYYY format.	string	7		“7/31/2009” “12/31/2015” “ ”
Second_FPRegistrationDate	Second Registration Date for Registrant	Some foreign principals found in the FARA bulk data had two registration dates. This variable serves to record the second registration dates, if applicable. In MM/DD/YYYY format.	string	14		“4/19/2001” “11/30/1998”
FPTerminationDate	Termination Date from Bulk Data	Indicates the termination date for a given foreign principal, if applicable, as listed in the FARA bulk data, in MM/DD/YYYY	string	5820		“10/1/2023” “10/15/2019” “ ”

		format.				
ForeignPrincipal	Foreign Principal from Bulk Data	Indicates the foreign principal affiliated with each registration number, as listed in the FARA bulk data. We found that some registrants' foreign principals in the bulk data did not match what was reported in the DOJ reports.	string	11159		"Embassy of Japan" "Government of Turkey, Embassy" "Korea Trade-Investment Promotion Agency"
FPRegistrationDate	Registration Date from Bulk Data	Indicates the registration date for a given foreign principal as listed in the FARA bulk data, in MM/DD/YYYY format.	string	8582		"8/1/2001" "5/20/2019"
CountryLocationRepresented	Country from Bulk Data	Indicates the country associated with each represented foreign principal in the FARA bulk data.	string	263		"IRAQ" "COTE D'IVOIRE (IVORY COAST)"
RegistrationNumber	Registration Number from Bulk Data	Indicates the registration number of a registrant as listed in the FARA bulk data.	string	6264		"616" "3492" "5680"
FPRegistrantDate	Registration Date from Bulk Data	Indicates the registration date for a registrant (agent) as listed in the raw FARA bulk data, in MM/DD/YYYY format.	string	5031		"7/2/1996" "12/2/2011" "9/13/1985"
FPRegistrantName	Registrant Name from Bulk Data	Indicates the registrant name as it appears in the FARA bulk data. We	string	5698		"Council of Khalistan" "Hill and Knowlton Strategies, LLC"

		cross-referenced registrant names with the same registration numbers and have matched up the registrants appearing in both the semi-annual reports and the bulk data to ensure that no two agents have the same registration number.				“Manatos & Manatos”
FPAddress1	Address Line 1 from Foreign Principal Bulk Data	Indicates the first line of the registrant’s address as listed in the FARA foreign principal bulk data. Some addresses appear to have not been sparse out, particularly addresses that are not American.	string	4445		“1571 Port Vila” “Palacio De Vidro, T A, Largo 4 De Fevereiro, CX P. 2223, Luanda Republic De Angola”
FPAddress2	Address Line 2 from Foreign Principal Bulk Data	Indicates the second line of the registrant’s address as listed in the FARA foreign principal bulk data, if applicable.	string	1156		“Vancouver, BC V6A 4C7” “2nd Floor” “Suite 650”
FPCity	City from Foreign Principal Bulk Data	Indicates the city of the registrant’s listed address as listed in the FARA foreign principal bulk data, if traditional American address.	string	557		“ ” “New York” “Boston” “Washington”
FPState	State from Foreign Principal Bulk	Indicates the state of the registrant’s listed address in the FARA foreign principal	string	41		“ ” “DC” “TX”

	Data	bulk data if traditional American address.				
FPZip	Zip Code from Foreign Principal Bulk Data	Indicates the zip code of the registrant's listed address in the FARA foreign principal bulk data if traditional American address.	string	141		“ ” “20001” “2210” “75024”
Registrant_Address1	Address Line 1 from All Registrants Bulk Data	Indicates the first line of the registrant's address as listed in the FARA all registrants bulk data. Some addresses appear to have not been sparse out, particularly addresses that are not American.	string	4454		“1571 Port Vila” “Palacio De Vidro, T A, Largo 4 De Fevereiro, CX P. 2223, Luanda Republic De Angola”
Registrant_Address2	Address Line 2 from All Registrants Bulk Data	Indicates the second line of the registrant's address as listed in the FARA all registrants bulk data, if applicable.	string	1413		“Vancouver, BC V6A 4C7” “2nd Floor” “Suite 650”
Registrant_City	City from All Registrants Bulk Data	Indicates the city of the registrant's listed address as listed in the FARA all registrants bulk data, if traditional American address.	string	810		“ ” “New York” “Boston” “Washington”
Registrant_State	State from All Registrants Bulk Data	Indicates the state of the registrant's listed address in the FARA all registrants bulk data if traditional American address.	string	51		“ ” “DC” “TX”

Registrant_Zip	Zip Code from All Registrants Bulk Data	Indicates the zip code of the registrant's listed address in the FARA all registrants bulk data if traditional American address.	string	1384		“ ” “20001” “2210” “75024”
RegistrationDate	Registration Date of Registrant from Bulk Data	Indicates the registration date for a registrant (agent) in the cleaned FARA bulk data, in MM/DD/YYYY format.	string	5031		“7/2/1996” “12/2/2011” “5/10/2001”
TerminationDate	Termination Date of Registrant from Bulk Data	Indicates the termination date for a registrant (agent) as listed in the FARA bulk data, in MM/DD/YYYY format, if applicable.	string	3918		“ ” “3/15/2010” “8/31/2023”
Name	Name from Bulk Data	Indicates the name of the registrant from the FARA bulk data.	string	5693		“Council of Khalistan” “Hill and Knowlton Strategies, LLC”
BusinessName	Business Name from Bulk Data	Indicates the business name of the registrant from the FARA bulk data, if a business name is present.	string	197		“ ” “LS2group” “TENEX-USA, Inc.”
TerminationYear	Termination Year from the Bulk Data	Indicates the year of termination for a registrant as listed in the FARA bulk data, if applicable.	Numeric (int)	83	[1943,2025]	“2021” “2019” “ ”
FPRegistrationYear	Foreign Principal Registration Year from the	Indicates the year of registration for a given foreign principal as listed in the FARA bulk data.	Numeric (int)	83	[1942,2024]	“1999” “2004” “2019”

	Bulk Data					
FPTerminationYear	Foreign Principal Termination Year from the Bulk Data	Indicates the year of termination for a given foreign principal as listed in the FARA bulk data, if applicable.	Numeric (int)	83	[1943,2025]	“2023” “2020” “2010” “.”
RegistrationYear	Registrant Year from the Bulk Data	Indicates the year of registration for a registrant as listed in the FARA bulk data.	Numeric (int)	83	[1942,2024]	“1995” “2001” “2018”
RegistrationMonth	Registration Month from the Bulk Data	Indicates the month of registration for a registrant as listed in the FARA bulk data.	Numeric (byte)	12	[1,12]	“12” “6” “8”
FPRegistrationMonth	Foreign Principal Registration Month from the Bulk Data	Indicates the month of registration for a given foreign principal as listed in the FARA bulk data.	Numeric (byte)	12	[1,12]	“6” “5” “11”
TerminationMonth	Termination Month from the Bulk Data	Indicates the month of termination for a registrant, if applicable, as listed in the FARA bulk data.	Numeric (byte)	12	[1,12]	“12” “9” “.”
FPTerminationMonth	Foreign Principal Termination Month from the Bulk Data	Indicates the month of termination for a given foreign principal, if applicable, as listed in the FARA bulk data.	Numeric (byte)	12	[1,12]	“3” “11” “.”
AppendixA	Appendix A	Indicates whether or not the	Numeric	2	[0,1]	“0”

	from the Semi-Annual Reports	registrant appears in Appendix A of a semi-annual report.	(float)			“1”
registration_terminated	Registration Terminated from the Semi-Annual Reports	Indicates whether or not the registration was terminated based on the semi-annual reports.	Numeric (float)	2	[0,1]	“0” “1”
DOJcountry	DOJ Country from the Semi-Annual Reports	Indicates the country associated with each foreign principal in the semi-annual reports.	string	222		“DENMARK” “IRELAND” “MALAYSIA”
DOJAddress	DOJ Address from the Semi-Annual Reports	Indicates the address listed for each registration in the semi-annual reports.	string	2609		“1220 L Street, N.W. Suite 411 Washington, DC 20005” “655 Third Avenue, 18th Floor Suite 1810 New York, NY 10017”
Nature_of_Services	Nature of Services from the Semi-Annual Reports	Records the nature of service categories as self-reported in the semi-annual reports. This variable will be used to help categorize the kind of work being done by registrants on behalf of foreign principals.	string	91		“Lobbying” “Public Relations” “Promotion of Tourism”
Activities	Activities from the Semi-Annual Reports	The descriptions of registrant activities as self-reported in the semi-annual reports. These activities will be used to help show the kind of work	string	5950		"The registrant provided public relations services to the foreign principal which included coordinating monthly

		being done by registrants on behalf of the foreign principals.				teleconferences, visits by U.S. journalists to Brazil and interviews by U.S. journalists. The registrant also coordinated the participation of Brazilian officials at events and conferences."
Finances	Finances from the Semi-Annual Reports	Gives the actual financial description given by each registrant, according to the DOJ semi-annual reports. We noted that some reported Finances indicate different reporting periods.	string	7575		"None Reported" "\$888,337.25 for the six month period ending June 30, 2005" "\$2,584,743.60 for the six month period ending March 31, 2014" "All monies reported under International Business Organization of Osaka"
finances	Value of Finances from the Semi-Annual Reports	The numerical financial value indicated in the registrant's reporting. This variable will be numerical if a value is reported. If a registrant's Finances = None Reported, this variable is coded with a "0".	Numeric (double)	5527	[0,89000000] Mean: 469629	"10750000" "6752617.5" "0"
FP_terminated	Foreign Principal Terminated	Indicates whether or not a foreign principal has been terminated. If FP_terminated	Numeric (float)	2	[0,1]	"0" "1"

	from the Semi-Annual Reports	= 1, the foreign principal has been terminated.				
found_in_bulkdata	Registrants from Semi-Annual Reports in Bulk Data	Indicates the registrants that are in the DOJ semi-annual reports and also the FARA bulk data. found_in_bulkdata = 1 indicates the registrants not found in the FARA bulk data, but are in the DOJ semi-annual reports. found_in_bulkdata = 2 indicates registrants that are found in both.	Numeric (float)	2	[0,1]	“1” “2”
DOJFile	File Name and Year for Bulk Data	Team-created variable for the Master Bulk Data files that identifies the Bulk Data and the respective Year you are examining	String (str10)	82		“Annual1967” “Annual2001” “Spring2020” “Fall1945”