



**U.S. Department of Justice**

Criminal Division

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Washington, DC 20530

July 19, 1988

[addressee deleted]

Dear [name deleted]:

This is in reference to your letter of June 28, 1988, responding to my letter of June 22, 1988, regarding your company's possible obligation to register pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.* (FARA or the Act).

You indicated in your letter that [U.S. company] is engaged in economic development activity on behalf of the [foreign local government]. Promoting economic investments in the [foreign local jurisdiction] is considered "political activity" as that term is defined in Section 1(o) of the Act. Attracting investments in any country other than the United States is considered "political propaganda" under Section 1(j) of FARA in that such activity attempts to influence a section of the public within the United States with reference to the public interests of the foreign country. Based on this, [U.S. company] is required to register pursuant to FARA.

Registration is accomplished by filing an initial statement on Form OBD-63, and Exhibits A and B on Forms OBD-67 and OBD-65 respectively. An Exhibit C, whenever applicable, may also be required to be filed.

A partner, officer, director, associate, employee, or agent of a registrant who engages directly in activity in furtherance of the interests of the registrant's foreign principal is required to file a short-form registration statement. This obligation, however, does not apply to an employee or agent of a registrant whose activities are rendered in a clerical, secretarial, or a related or similar capacity.

The initial and short-form registration statements as well as all exhibits must be filed in triplicate. The fourth copy should be retained by the registrant for his records. Also enclosed is a copy of the Act and the rules thereunder.

If you have any questions, please contact Heather H. Hunt at (202) 786-4926.

Sincerely,

Joseph E. Clarkson, Chief  
Registration Unit  
Internal Security Section

Enclosures