



U.S. Department of Justice

National Security Division

Counterintelligence and Export Control Section

Washington, DC 20530

July 29, 2015

[addressee deleted]

Re: [text deleted]

Dear [name deleted]:

This is in reference to your letter of March 25, 2015, concerning [US organization] and its 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).

Based on the representation in your letter, the Department does not consider the [US organization] “an agent of a foreign principal” as that term is defined in the Act, because it is not acting at the request or under the direction or control of a foreign principal in activities enumerated in Section 1(c)(1)(i)-(iv) of the Act. Accordingly, registration is not required.

Please note that the question of obligation or exemption must be revisited as the nature of the relationship changes from time to time. Because the question of obligation or exemption depends on your client's relationship with any foreign principal, this opinion is limited to the facts as represented. If the facts concerning [US organization]'s relationship should change, you may wish to ask us to reexamine whether [US organization] has an obligation to register under the Act.

If you have any questions, please contact the FARA office at (202) 233-0776.

Sincerely,

Heather H. Hunt, Chief
Registration Unit