



U.S. Department of Justice

National Security Division

Counterintelligence and Export Control Section

Washington, DC 20530

April 2, 2019

Via Email and USPS

[addressee deleted]

Re: Request for Advisory Opinion Pursuant to 28 C.F.R. § 5.2

Dear [name deleted]:

We write in response to your letter of January 24, 2019, requesting an opinion, pursuant to 28 C.F.R. § 5.2(a), with respect to the registration obligation of your client, [individual], under the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.* (“FARA” or the “Act”). Your letter states that [individual] is intending to accept an appointment as an honorary ambassador of the [foreign government] to the [foreign country].

FARA requires the registration of “agents of foreign principals” engaged within the United States in “political activities” or other specified activities. 22 U.S.C. § 611(c), (o). According to your letter, [individual] would not be engaging within the United States in any of the activities enumerated in the Act that require registration. In the event that he does engage with any U.S. government officials or the American public to advocate on behalf of [foreign government], or any other foreign principal, his registration obligation likely would change.

Accordingly, based upon the representations in your letter, we have determined [individual] does not have an obligation to register under the Act for the limited circumstances outlined in the letter. If [individual]’s activities differ in any way from those described in your letter, you must reengage with our office concerning a possible obligation to register under the Act. We will treat your submission in accordance with 28 C.F.R. § 5.2(m). Please contact [name deleted] at (202) 233-0776, if you have any questions.

Sincerely,
Brandon L. Van Grack
Chief, FARA Unit