



**U.S. Department of Justice**

National Security Division

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Counterintelligence and Export Control Section

Washington, DC 20530

July 2, 2015

[addressee deleted]

Dear [name deleted]:

This is in reference to your letter of March 30, 2015, concerning your possible obligation to register under the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.* (FARA or the Act) pursuant to your contract with [US company] for work conducted on behalf of [foreign government].

Based on your representation, the Department does not consider that you are “an agent of a foreign principal” as that term is defined in the Act, because your activities are not among those enumerated in Section 1(c)(1)(i)-(iv). 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 relationship with any foreign principal, this opinion is limited to the facts as represented. If the facts concerning your relationship should change, you may wish to ask us to reexamine whether you have 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