

*Meltzer also represents clients in customs and trade remedy cases and provides advice on Foreign Agents Registration Act requirements. Professional Activities Prior to joining the firm, Mr. Meltzer was a professor at the State University of New York at Buffalo, where he published widely in the fields of US foreign economic relations, national.*

Table of contents for The lobbying manual: Bibliographic record and links to related information available from the Library of Congress catalog. Contents data are machine generated based on pre-publication provided by the publisher. Contents may have variations from the printed book or be incomplete or contain other coding. The Lobbying Disclosure Act of History Through 5 William N. Harriss 12 Scope of Coverage 33 William V. Lorry Spitzer Introduction 34 In General 37 Definition of "Lobbyist" 37 In General 44 Overview of the Section 15 Election 69 Definitional Substitution 74 Summary: Lorry Spitzer Introduction 89 Registration: Some Basic Issues 90 Form LD-2 Administration and Miscellaneous Matters William V. Luneburg Introduction Administrative Duties: Vaughn Introduction Threshold Requirements Cochran and Chad W. Lorry Spitzer Introduction History Lorry Spitzer Introduction c 3 Organizations Meltzer Introduction Persons Subject to Registration Elect, If Possible Bauer and Rebecca H. Buffone and James B. Contempt Proceedings Resulting from a Claim of Privilege Rules and the Model Rules Bar Rules Lobbying Disclosure Act of codified Appendix B Lobbying Disclosure Act Appendix A Lobbying Disclosure Act of codified Appendix A Lobbying Disclosure Act Guidance No. Registration Statement Appendix E Amendment to Registration Statement Appendix E Supplemental Statement Appendix E Conflict of Interest Appendix H Financial Disclosure Appendix H Lobbying -- Law and legislation -- United States.

### 2: The lobbying manual : a complete guide to federal lobbying law and practice in SearchWorks catalog

*Meltzer also represents clients in customs and trade remedy cases and provides advice on Foreign Agents Registration Act requirements. Read more on firm website Education.*

It was used in 23 criminal cases during World War II. For cases not warranting prosecution, the Department of Justice sent letters advising prospective agents of the law. The amendments shifted the focus of the law from propaganda to political lobbying and narrowed the meaning of "foreign agent". This has resulted in a number of successful civil cases and administrative resolutions since that time. Keene, in which a California State Senator wanted to distribute three films from Canada about acid rain and nuclear war, but felt his reputation would be harmed if he distributed films that had been classified officially as "political propaganda". Du Bois was spreading propaganda as an agent of foreign governments. The trial judge dismissed the case for lack of evidence. John Joseph Frank D. Department of Justice won a court case forcing the committee to register with the IRA as its foreign principal, but the committee was allowed to include a written disclaimer against the court ruling. The Irish People, Inc. Southern Command and various Cuban-American groups thought to be committing terrorist acts in Cuba. Susan Lindauer et al involved a former U. Congressional staffer and journalist whom the U. During and after her one-year incarceration, she was twice judged incompetent to stand trial. The case was dropped in Under the act, RT will be required to disclose financial information. Others target specific agents, such as federal legislation shutting down the Palestine Liberation Organization office in Washington, DC, in and Executive Order which prohibits fundraising within the United States on behalf of certain violent groups opposed to the Israeli-Palestinian peace process. The Antiterrorism and Effective Death Penalty Act of prohibits, among other things, fundraising which is done to benefit foreign organizations designated by the United States as terrorist. Allegations of selective enforcement[ edit ] Although the act was designed to apply to any foreign agent, it has been accused of being used to target countries out of favor with an administration. The Department of Justice later withdrew its demand. While Franklin pleaded guilty to passing government secrets to Rosen and Weissman, as well as to an Israeli government official, [46] [47] the cases against Rosen and Weissman were dismissed and no actions against AIPAC were instituted.

## 3: Foreign Agents Registration Act | Department of Justice

*Meltzer has extensive experience dealing with the US Department of State, US Department of Commerce and OFAC on these matters. Mr. Meltzer also represents clients in customs and trade remedy cases and provides advice on Foreign Agents Registration Act requirements.*

Please enter your email address Please enter a valid email Please enter a maximum of 5 recipients. Use ; to separate more than one email address. Please enter an email address Please enter valid email addresses Recipient name s: Please enter a recipient name Email yourself a copy? Ronald Meltzer and David Ross of WilmerHale discuss the risks and complexities of the increasing extraterritoriality of US sanctions laws For many years, the United States has imposed economic sanctions against certain designated countries, entities and individuals for critical foreign policy and national security reasons, such as combating terrorism, the proliferation of weapons of mass destruction, and narcotics trafficking. In some cases, Ofac sanctions comprise embargoes on almost all commercial and financial dealings with certain countries in the case of Cuba, Iran and Sudan, for example ; in other instances, Ofac sanctions only apply to specific dealings with designated entities and individuals. Until recently, US sanctions focused primarily on transactions by so-called US persons, a term that includes all US citizens and permanent residents located anywhere in the world, companies organised in the United States, foreign branches of US companies, and individuals, entities, and property located in the United States. Ofac requirements also reach any company directors, officers or employees who are US persons, even if they are located outside of the United States or work for entities that are non-US companies. Notably, such US persons may not engage in any activity that facilitates, approves, or supports any transactions by others with designated countries, individuals or groups. With limited exceptions such as Ofac sanctions involving Cuba , the sanctions did not apply extraterritorially: Moreover, in the past Ofac sanctions that did have extraterritorial reach “ primarily provisions relating to Cuba “ were controversial internationally. These conflict-of-law issues concerning Ofac sanctions have subsided in recent years at the same time that US sanctions involving Iran have become increasingly extraterritorial in scope and effect. This is largely due to the evolving multilateralisation of sanctions against Iran in connection with international efforts to address threats posed by the Iranian nuclear programme. The growing extraterritoriality of US sanctions In , Congress enacted the Iran and Libya Sanctions Act to provide for the imposition of sanctions on persons engaging in certain specified conduct relating to the Iranian and Libyan petroleum sectors. This statutory paradigm “ sanctions arising from conduct by any person engaging in targeted activities, regardless of nationality “ has become the basis for recent US sanctions involving Iran. Indeed, US law in this area has undergone a significant shift: Congress also sought to address a more general concern raised by existing US sanctions involving Iran: This not only placed many American companies at a competitive disadvantage globally, but also undermined the effectiveness of US sanctions and allowed Iran to pursue its goals, including developing its nuclear capabilities, with impunity. Accordingly, a core feature of Cisada was a significant expansion in the extraterritoriality of the ISA. Notably, Ofac does not view its section c authority as necessarily extraterritorial because, strictly speaking, the prohibitions arising from this authority apply to US banks “ the provisions restrict them from opening or maintaining certain accounts with foreign financial institutions found to have engaged in sanctionable conduct “ and not to their foreign bank customers. Following the enactment of Cisada, Congress and the Executive Branch have continued to increase pressure on Iran through a series of additional measures targeting other types of Iran-related transactions by foreign entities deemed to be sanctionable conduct. This Act limits access to the US financial system by non-US financial institutions found to have knowingly conducted or facilitated any significant financial transaction with the Central Bank or other blocked Iranian financial institutions. In July , the President signed Executive Order , which provides for the imposition of sanctions on foreign financial institutions that knowingly conduct or facilitate significant transactions with the National Iranian Oil Company or Naftiran Intertrade Company or for the purchase or acquisition of Iranian petroleum, petroleum products, or petrochemical products. This expansion addressed strong concerns during recent years about loopholes in

Ofac sanctions that permitted foreign subsidiaries and other entities owned or controlled by US companies to continue engaging in business with Iran. The Act also expanded the scope of section of Cisada to target, among other things, foreign financial institutions that knowingly facilitate or participate in various proscribed activities or act on behalf of another person with respect to those activities. In addition to these types of extraterritorial sanctions involving Iran, the United States has also taken steps to broaden sanctions against Syria in response to the ongoing conflict in that country. This Act further expanded the Cisada-style sanctions framework for financial institutions that knowingly conduct or facilitate significant financial transactions involving the targeted sectors or products or on behalf of a blocked Iranian person. It also provides for the imposition of sanctions on entities providing underwriting, insurance, or reinsurance services relating to other sanctioned activities. In June , the President signed Executive Order , which provides for the imposition of sanctions on foreign financial institutions that knowingly conduct or facilitate significant transactions for the purchase or sale of the Iranian rial, or that maintain significant rial accounts outside Iran. Predating these broadened sanctions involving Iran and Syria, the International Emergency Economic Powers Enhancement Act of constituted another underlying expansion of the extraterritorial reach of Ofac sanctions. Thus, non-US entities could be in violation of this Act, even if they were not otherwise subject to Ofac regulations, by taking action that caused US personsto breach Ofac requirements. This type of liability came into play in major enforcement actions recently taken against non-US financial institutions. In May , the Obama Administration further incorporated such causation as a ground for sanctions with the issuance of Executive Order , which explicitly authorises sanctions against foreign persons found to have violated US sanctions against Iran or Syria, caused a violation of such sanctions, or "facilitated deceptive transactions" with respect to such sanctions. In August , it sanctioned a Syrian company for selling gasoline to Iran. And on May 31 , Ofac announced the imposition of sanctions on a Cyprus and Ukraine-based company for facilitating deceptive transactions for the National Iranian Tanker Company and on companies and individuals located in Kyrgyzstan, Ukraine and the UAE for leasing and selling aircraft to Mahan Air and Iran Air. Compliance Ofac sanctions are promulgated under a strict liability regime, and thus the onus is on individual companies to assess their own areas of risk and then take reasonable steps to prevent transactions direct or indirect that violate US sanctions laws. Ofac expects companies to develop their own risk-based compliance programmes to ensure that they have identified and addressed the areas of their business operations that present the most likely instances of possible violations. Indeed, for non-US entities and individuals, the degree of difficulty is heightened because US-defined grounds for sanctionable conduct may not be fully understood by transaction parties from other jurisdictions or consistent with legal requirements and compliance responsibilities established under local laws. In some ways, US sanctions based on the Cisada paradigm accommodate these concerns by including a knowledge qualifier for sanctionable conduct, specifying certain transaction-value thresholds and otherwise limiting the conduct at issue to significant transactions. These terms effectively create higher "trigger-points" for incurring liability than exist in other US sanctions laws mainly applicable to US persons. However, many of the extraterritorial provisions also include sanctions arising from "facilitation," which is not defined in the relevant statutes or Executive Orders and which has long been a thorny compliance issue, even under prior Ofac regulations applicable to US persons. The uncertain parameters of action that constitutes "facilitation" in the new laws only complicate and extend to non-US entities a compliance dilemma that already troubles many financial institutions. The new Iran sanctions laws also could be said to take the specific circumstances and interests of foreign countries into account by including different types of exceptions, waivers and special rules that enable non-US entities to escape sanctions, even if they have engaged in otherwise sanctionable conduct. For example, section g of Cisada includes a special rule that authorises the President not to impose sanctions on firms found to be no longer engaging in the sanctionable activity and that provide reliable assurances that they will not knowingly do so in the future. In addition, many of the provisions involving conduct by foreign financial institutions are subject to a "significant reduction" exception concerning reduced consumption of Iranian crude oil by their respective countries. However, the availability and scope of this exception have been limited by recent legislation. Such discretion affects whether to investigate sanctionable conduct or to impose different types of sanctions in any given case. Surely,

concerns about the compliance challenges of foreign entities and broader bilateral foreign policy interests in specific circumstances figure into deliberations at the State Department and Ofac in determining whether and how to proceed with such sanctions. Ofac has increasingly advocated that US financial services firms implement risk-based policies and procedures to properly monitor and mitigate their sanctions risks. In light of the growing extraterritoriality of US sanctions laws, foreign financial institutions would be well advised to heed this same advice. Many large foreign financial institutions have already taken significant action to incorporate US sanctions requirements into their risk-management analyses and operations. Such inclusion can be difficult, however, due to differences that exist with respect to foreign compliance cultures, languages, and business customs involving relationships with counterparties. In many instances these differences present such challenges to compliance with applicable US sanctions requirements that foreign financial institutions have strong incentive to simply de-risk possible dealings with Iran in other words to establish broad mandates to exit all business with that country, even if the transactions may not be sanctionable. Many leading foreign financial services firms have already adopted this approach in response to the severe risks and compliance challenges presented by US sanctions laws. Paradoxically, this may mean that only those with weak internal compliance capabilities or priorities are left to engage in dealings with Iran. This could increase the likelihood and extent of sanctionable conduct certainly an unintended collateral consequence of recent US laws and policies involving Iran.

## 4: Arthur W. Diamond Law Library /All Locations

*An "agent of a foreign principal" or "foreign agent" under FARA is anyone who, on behalf of a "foreign principal," engages in political activities, acts in a public relations capacity, solicits or dispenses anything of value within the United States, or provides representation before any agency or official of the U.S. government.*

FARA is a foreign agent disclosure statute administered by the U. Department of Justice DOJ. Under FARA, agents of a foreign principal must disclose certain activities, including fees and expenditures. Individuals representing foreign governments or foreign political parties must register under FARA. Foreign Agent An "agent of a foreign principal" or "foreign agent" under FARA is anyone who, on behalf of a "foreign principal," engages in political activities, acts in a public relations capacity, solicits or dispenses anything of value within the United States, or provides representation before any agency or official of the U. Foreign Principal A "foreign principal" is a foreign government or political party, a person outside the United States unless a U. An entity organized under U. However, if an entity organized under U. Note however, that there is an exemption from registering under FARA where the lobbying activity is only in the form of "private and nonpolitical activities in furtherance of the bona fide trade or commerce of such foreign principal. Registration and Disclosure Foreign agents must register with the Attorney General within 10 days of being hired using the Registration Statement form. Foreign agents must file reports within 30 days of the end of the semiannual reporting period using the Supplemental Statement form. FARA registrations and semiannual reports must disclose registrant information, foreign principal information, payment and expenditure information, and specific representational activities. Individuals affiliated with a FARA registrant and actively involved with the representation must disclose certain information on a Short-Form Registration form, including political contributions made within the 90 days prior to the initial filing, and throughout the period that the person remains registered. Written and recorded materials distributed in furtherance of a FARA regulated activity must be specifically marked with identifying language. The LDA requires disclosure of lobbying activities, including the issues lobbied and payment and expenditure amounts related to lobbying. The LDA is enforced by the U. Attorney for the District of Columbia and violations are subject to fines and in some cases prison time. The bottom line on FARA vs. LDA is as follows: Individuals representing 1 foreign governments or 2 foreign political parties in attempts to influence the U. Individuals lobbying on behalf of foreign individuals or entities for private and nonpolitical activities in furtherance of trade or commerce must register under the LDA if their activities meet the definition of lobbying under the LDA. FARA and the LDA are mutually exclusive in that if properly registered under one, an individual is not required to register under the other. However, the choice is not solely in the hands of the individual. If the lobbying is on behalf of a foreign principal and is meant to influence the U. The content of this article is intended to provide a general guide to the subject matter. Specialist advice should be sought about your specific circumstances.

## 5: Ronald I. Meltzer - Washington, DC - Lawyer | Best Lawyers

*Foreign Agents Registration Act / Ronald I. Meltzer DOJ FARA enforcement / Jim Christian and Taryn Frideres Criminal prosecution of lobbyists and lawmakers for bribery, gratuities, and honest services fraud / Virginia E. Davis Horton and James B. Christian Jr.*

Criminal Resource Manual FARA or the Act is a disclosure statute aimed at "agents of foreign principals" agents as defined, who are engaged in covered activities, on behalf of their foreign principals, unless exempt. From its passage in until the amendments, FARA was focused on propagandists. The original Act included a fairly broad definition of the term agent, and a single felony penalty for the most serious transgressions. It was used in the World War II era to successfully prosecute some 23 criminal cases. After administration of the Act was transferred from the Department of State to the Department of Justice in , the Department developed the practice of attempting to achieve compliance with the statute in instances which did not on their face warrant prosecution by sending letters advising prospective agents of the existence of FARA and their possible obligations thereunder. The practice was not without its enforcement significance, since receipt of the letter could sometimes be used to help prove the willfulness of the failure to register, as, for example, in *United States v. John Joseph Frank, D. In* , FARA was significantly amended to focus on the integrity of the United States Government decision-making process, and to emphasize agents seeking economic or political advantage for their clients. The amendments were prompted by the excesses of lobbyists struggling over their share of the "sugar quotas" legislatively determined after trade with Cuba, the principal sugar producer, was prohibited. It required any person engaged in "political activities", as defined, as an agent on behalf of a foreign principal, to register. This is substantially narrower than the original act, which did not require that the activities be "for or on behalf of" the foreign principal. Since there have been no successful criminal prosecutions under FARA and only 3 indictments returned or informations filed charging FARA violations. The three criminal cases post were: In addition, there have been 2 other grand jury investigations that did not result in criminal charges. At the conclusion of the investigation, a recommendation was made to proceed with an injunctive action, but that recommendation was rejected by the Assistant Attorney General. In the second, a grand jury in Connecticut developed information that became the basis for a civil consent decree against the advertising firm Young and Rubicam in for failing to report a fee splitting agreement with a Jamaican firm associated with a Jamaican Government official. By way of contrast, there have been 17 civil cases in that period, of which 10 were successfully litigated and 7 ended by consent decree. The number of administrative resolutions is much greater. The threshold for a criminal investigation is the presence of reason to believe that a significant FARA offense has been committed and that sufficient evidence should be available to prove this. The common threads of the last four FARA criminal investigations were: The threshold for a civil action is sufficient credible evidence of a significant violation for which the civil injunctive remedy is judged appropriate in light of all the circumstances because time is of the essence or for some other reason. Civil actions often result from "Section 5" inspections of the books and records of registered agents. Section 5 of the Act, 22 U. Civil cases are always submitted to the Assistant Attorney General, Criminal Division for approval before filing. If the Department receives credible information establishing a prima facie registration obligation, where evidence of intent is lacking, the Department usually sends a letter advising the person of the existence of FARA and the possible obligations thereunder. The letter usually cites or provides the information prompting the inquiry. If this administrative route is chosen, and there is no response to the letter, or a seemingly false response, the only alternatives are to refer the matter to the FBI, which has the responsibility for FARA investigations, or to close the matter pending receipt of sufficient evidence to warrant some other action. The letter in that event will have served its purpose of putting the person on notice of the existence and reach of the Act. The Department has asked for authority to issue civil investigative demands CID to more effectively gather evidence in these situations. In the meantime, letters have been used as stated above. The oft-amended Foreign Agents Registration Act of , as amended, is the foundation for requiring the registration of, and disclosures by, "agents of foreign principals," as defined, who are engaged in "political activities" as defined, or other defined

activities of a quasi-political nature, and who are not exempt. It covers most lobbying, advertising, public relations, and fundraising for "foreign principals" as defined, that is not of a commercial nature, or performed by Embassy officials. The Act requires agents to make periodic public disclosure of their identities, agency, activities, receipts and disbursements. Disclosure of the required information facilitates evaluation by the government and the American people of the statements and activities of such persons in light of their status as foreign agents. The news media are the greatest users of the information filed under the Act, and give it further publicity, usually without attribution. There are numerous other federal statutes aimed at persons loosely called foreign agents. See, e. Restricting the discussion to foreign agents engaged in political activities covered by the Act, there are both federal statutes which authorize the exemption of otherwise covered agents. See, e. The Palestine Liberation Organization office in Washington, DC, for example, registered from to , but was closed in as a result of the passage of federal legislation. This includes the essentially administrative function of providing registration forms, with copies of the Act, Rules, Regulations, and guidelines for responses to the firms and individuals registered under the Act, as well as the members of the public, press and bar who write or call to request them. It also includes the more proactive outreach to the primarily professional communities law, advertising, political and public relations from which the majority of agents are drawn, as well as informing and educating prosecutors, and interested Departments and Agencies regarding the Act. Encouraging voluntary compliance and providing information on the identities of those registered generates "Rule 2" advisory opinion requests, 28 C. At another level, the Unit has established a number of routine enforcement initiatives, from reviewing a wide range of publications for indications of activities by unregistered agents to reviewing the filings of registered agents and conducting audits or inspections of their books and records. S , were developed in this fashion. The Unit also works closely with the law enforcement and intelligence community components who provide reports on potential violations of the Act. The Department has fared well in the Courts in its enforcement efforts, with the exception of the decision in *United States v. Hunt*. This case shortened the statute of limitations for agents who refuse to register, contrary to the express language in Section 8 e of the Act. Hunt, Chief, and Clifford I. Rones and Robert E.

## 6: US Places Weak Limits on Messaging by Foreign Governments

*The Foreign Agents Registration Act (FARA) was enacted in FARA is a disclosure statute that requires persons acting as agents of foreign principals in a political or quasi-political capacity to make periodic public disclosure of their relationship with the foreign principal, as well as activities, receipts and disbursements in support of those activities.*

## 7: Ronald I. Meltzer | WilmerHale

*The number of persons and entities registering with the Department of Justice (DOJ) as foreign agents under the Foreign Agents Registration Act (FARA) is on the rise. According to DOJ FARA Registration Unit, the number of new primary registrations had grown from 69 in to in*

## 8: Foreign Agents Registration Act - Wikipedia

*Ronald Meltzer, senior counsel at and Virginia federal courts coincides with a more aggressive approach by the Justice Department to enforce the Foreign Agents Registration Act, an year-old.*

## 9: Table of contents for The lobbying manual

*The Foreign Agents Registration Act of , as amended, 22 U.S.C. Â§ et seq. (FARA or the Act) is a disclosure statute aimed at "agents of foreign principals" (agents) as defined, who are engaged in covered activities, on behalf of their foreign principal(s), unless exempt.*

*When the bees fly home The American Law Institute Reporters Studies on WTO Case Law Un peacekeeping training manual Bacterial disease mechanisms 10 Cheshire cycle tours. The first Christmas, from the Gospel of St. Luke Cotton fields no more Unwritten natasha bedingfield piano Para ser novelista john gardner Pillars in Ethiopian History Calculation of parenteral medications Rural politics and the collapse of Pennsylvania federalism Towards the edge of the universe Operational and clinical aviation psychology The eagle and the rising sun 4 Regulation and function of phase variation in Escherichia coli 89 Harness in the parlour Advanced management accounting ca final notes Cats and Their Dykes A Personalist Jurisprudence, the Next Step High performance mysql The lunatic still at large Trekking on a Trail The servant and the water princess Queen Victoria (Great Rulers) 12. Developing algebraic thinking in earlier grades : some insights from international comparative studie In a French hospital Federal governments telephone employment verification system and California State Assembly Bill 507 Relative abundance and thermal and geographic distribution of sea turtles off the U.S. Atlantic coast bas 2 Four great Gentile Empires Preceding the Kingdom of God . 251 Illustrations of North American pitcherplants Swords for teeth, mirrors for eyes Charles M. Saplak Life after High school. Echo made easy sam kaddoura Monterey Bay Area To expand the powers of the Indian Arts and Crafts Board How to Finance a Home York City Chamberlains Account Rolls 1396-1500 (Publications of the Surtees Society) Intro of science of health fitness Molecular Imaging in Neuroscience*