

CHARLES E. GRASSLEY, IOWA, CHAIRMAN

LINDSEY O. GRAHAM, SOUTH CAROLINA  
JOHN CORNYN, TEXAS  
MICHAEL S. LEE, UTAH  
TED CRUZ, TEXAS  
JOSH HAWLEY, MISSOURI  
THOM TILLIS, NORTH CAROLINA  
JOHN KENNEDY, LOUISIANA  
MARSHA BLACKBURN, TENNESSEE  
ERIC SCHMITT, MISSOURI  
KATIE BOYD BRITT, ALABAMA  
ASHLEY MOODY, FLORIDA

RICHARD J. DURBIN, ILLINOIS  
SHELDON WHITEHOUSE, RHODE ISLAND  
AMY KLOBUCHAR, MINNESOTA  
CHRISTOPHER A. COONS, DELAWARE  
RICHARD BLUMENTHAL, CONNECTICUT  
MAZIE HIRONO, HAWAII  
CORY A. BOOKER, NEW JERSEY  
ALEX PADILLA, CALIFORNIA  
PETER WELCH, VERMONT  
ADAM B. SCHIFF, CALIFORNIA

United States Senate

COMMITTEE ON THE JUDICIARY

WASHINGTON, DC 20510-6275

February 14, 2025

**VIA ELECTRONIC TRANSMISSION**

The Honorable Pamela Bondi  
Attorney General  
Department of Justice

Dear Attorney General Bondi:

The Justice Department has a duty to ensure that the Foreign Agents Registration Act (FARA) remains a priority tool to address foreign lobbying and influence campaigns and that these responsibilities are executed without political weaponization.<sup>1</sup> To accomplish that, the Department must ensure FARA is applied fairly and consistently. FARA provides the American people with much needed accountability and transparency. FARA is a content-neutral statute that does not prohibit activity. It simply requires individuals to register with the Justice Department if they are acting as an agent of a foreign government or enterprise to influence U.S. public policy and opinion. This allows the American people, and Congress, to evaluate the activities of foreign agents and entities. FARA oversight has been one of my priorities over the past decade and has spanned multiple administrations.<sup>2</sup> My oversight includes efforts to ensure strong

<sup>1</sup> See 22 U.S.C. § 611 et seq.

<sup>2</sup> In April 2015, I began my FARA oversight activities and as Chairman of the Senate Committee on the Judiciary, I held a FARA oversight hearing in July 2017, *see*: Oversight of the Foreign Agents Registration Act and Attempts to Influence U.S. Elections: Lessons Learned from Current and Prior Administrations, <https://www.judiciary.senate.gov/committee-activity/hearings/oversight-of-the-foreign-agents-registration-act-and-attempts-to-influence-us-elections-lessons-learned-from-current-and-prior-administrations>; *Also see*, Letter from Sens. Chuck Grassley, T. Scott, Ernst, Cruz, and Scott to DOJ and FBI, *FARA review of NSJP and related groups* (Oct. 8, 2024), [https://www.grassley.senate.gov/imo/media/doc/grassley\\_ernst\\_cruz\\_scott\\_to\\_doj\\_and\\_fbi\\_-\\_fara\\_-\\_nsjp\\_related\\_groups.pdf](https://www.grassley.senate.gov/imo/media/doc/grassley_ernst_cruz_scott_to_doj_and_fbi_-_fara_-_nsjp_related_groups.pdf); Letter from Sens. Chuck Grassley, T. Scott, and Risch, *FARA review of CSSA* (Dec. 8, 2023), [https://www.grassley.senate.gov/imo/media/doc/scott\\_grassley\\_et\\_al\\_to\\_doj\\_-\\_cssa\\_fara.pdf](https://www.grassley.senate.gov/imo/media/doc/scott_grassley_et_al_to_doj_-_cssa_fara.pdf); Letter from Sen. Chuck Grassley, Ranking Member, S. Budget Comm., to the Honorable Merrick Garland, Attorney General, *FARA – China Iron and Steel Compliance* (Aug. 7, 2023), [https://www.grassley.senate.gov/imo/media/doc/grassley\\_to\\_garland\\_-\\_fara\\_china\\_iron\\_and\\_steel\\_compliance.pdf](https://www.grassley.senate.gov/imo/media/doc/grassley_to_garland_-_fara_china_iron_and_steel_compliance.pdf); Press Release, Sen. Chuck Grassley, Ranking Member, S. Judiciary Comm., *Senators Push DOJ on FARA Compliance of Brookings Institution* (Aug. 6, 2022), <https://www.grassley.senate.gov/news/news-releases/senators-push-doj-on-fara-compliance-of-brookings-institution>; Press Release, Sen. Chuck Grassley, Chairman, S. Finance Comm., Sen. Ron Johnson, Chairman, and S. HSGAC Comm., *Johnson, Grassley Seek Information Regarding Blue Star Strategies' Work for Burisma Holdings* (May 25, 2022), <https://www.grassley.senate.gov/news/news-releases/grassley-johnson-to-doj-did-burismas-us-lobbying-firm-file->; Press Release, Sen. Grassley, Ranking Member, S. Judiciary Comm., *Chinese Propaganda Outfits at U.S. Schools Get Boost from Biden Admin* (Feb. 11, 2021), <https://www.grassley.senate.gov/news/news-releases/chinese-propaganda-outfits-at-us-schools-get-boost-from-biden-admin>; Press Release, Sen. Grassley, Ranking Member, S. Judiciary Comm., *Grassley Questions DOJ on Biden Family FARA Compliance Stemming from Business Deals with Chinese Communist-Backed Energy Tycoons* (Nov. 10, 2020), <https://www.grassley.senate.gov/news/news-releases/grassley-questions-doj-biden-family-fara-compliance-stemming-business-deals>; Press Release, Sen. Chuck Grassley, Chairman, Senate Finance Committee, *Lawmakers Seek FARA Evaluation Of Qatari-Owned Al Jazeera* (June 19, 2019), <https://www.grassley.senate.gov/news/news-releases/lawmakers-seek-fara-evaluation-qatari-owned-al-jazeera>; Letter from Sen. Chuck Grassley, Chairman, S. Judiciary Comm., to Dana Boente, Acting Deputy Attorney General, *FARA – Paul Manafort* (April 6, 2017), [https://www.grassley.senate.gov/imo/media/doc/2017-04-06%20CEG%20to%20DOJ%20\(Manafort%20Podesta%20FARA\).pdf](https://www.grassley.senate.gov/imo/media/doc/2017-04-06%20CEG%20to%20DOJ%20(Manafort%20Podesta%20FARA).pdf); Letter from Sen. Chuck Grassley, Chairman, Senate

registration enforcement, when required, cracking down on hidden foreign lobbying schemes and continued efforts to fix deficiencies within the FARA statute. This has led to the reintroduction of bipartisan legislation across multiple Congresses.<sup>3</sup>

Foreign interests work aggressively to shape U.S. policy to their benefit.<sup>4</sup> Based on FARA disclosures, in 2022 and 2023, FARA registrants engaged in nearly 130,000 political activities, reporting over \$14 million in political spending during the same two year period.<sup>5</sup> These figures are likely grossly understated, as they only include information for individuals that registered and disclosed activities. The public has a right to know who is attempting to influence their government on behalf of foreign interests, and FARA is an important tool that ensures the public's business remains public.

With this in mind, I write to you requesting information regarding the Justice Department's criminal and civil enforcement of FARA during the past administration. I am also pleased to see that, as you discussed during your confirmation process, steps have already been taken to review the resources necessary for the Department's FARA Unit to perform its duties.<sup>6</sup> For example, on February 5, 2025, the Justice Department issued a memorandum titled, "General Policy Regarding Charging, Plea Negotiations, and Sentencing", which contained FARA updates.<sup>7</sup> Specifically, the section "Shifting Resources in the National Security Division" states that, "to free resources to address more pressing priorities, and end risks of further weaponization and abuses of prosecutorial discretion, the Foreign Influence Task Force [FITF] shall be disbanded."<sup>8</sup> Given past weaponization and bias from the FITF, which improperly briefed me and Senator Ron Johnson in August 2020, undermining our Biden family investigation, this appears to be a step in the right direction in reallocating resources.

Accordingly, so that Congress may conduct independent and objective oversight, please provide records and written responses to the FARA-related matters listed below for the time period of January 2021 to present.<sup>9</sup> Please provide responses no later than February 28, 2025:

1. The number of FARA civil enforcement cases that the Justice Department opened. Of those, how many were closed?

---

Judiciary Comm., to Attorney General Eric Holder, *FARA – Clinton Foundation* (Apr. 22, 2015), [https://www.judiciary.senate.gov/imo/media/doc/2015-04-22%20CEG%20to%20DOJ%20\(Clinton%20FARA\).pdf](https://www.judiciary.senate.gov/imo/media/doc/2015-04-22%20CEG%20to%20DOJ%20(Clinton%20FARA).pdf).

<sup>3</sup> S. 1364, 118th Cong. (2023); S. 2229, 118th Cong. (2023); S. 1724, 117th Cong. (2022); S. 1762 116th Cong. (2019); S. 2039, 115th Cong. (2017).

<sup>4</sup> Ben Freeman and Nick Cleveland-Stout, *Foreign Lobbying in the U.S.*, QUINCY INSTITUTE FOR RESPONSIBLE STATE CRAFT, (July 3, 2024), <https://quincyinst.org/research/foreign-lobbying-in-the-u-s/#>.

<sup>5</sup> *Id.*

<sup>6</sup> See responses to Senator Grassley, Chairman, Questions for the Record to The Honorable Pamela Jo Bondi, Nominee to be Attorney General of the United States (Jan. 16, 2025). On File with Comm.Staff.

<sup>7</sup> Office of the Attorney General, Memorandum, *General Policy Regarding Charging, Plea Negotiations, and Sentencing* (Feb. 5, 2025), <https://www.justice.gov/ag/media/1388541/dl?inline>.

<sup>8</sup> *Id.*

<sup>9</sup> "Records" include any written, recorded, or graphic material of any kind, including letters, memoranda, reports, notes, electronic data (emails, email attachments, and any other electronically created or stored information), calendar entries, inter-office communications, meeting minutes, phone/voice mail or recordings/records of verbal communications, and drafts (whether they resulted in final documents).

2. The number of FARA criminal enforcement cases the Justice Department opened. Of those, how many resulted in prosecution?
3. The total count and dollar amount of fines the Justice Department assessed under FARA. Of that amount, how much was actually paid? For the total assessed and paid fines, provide a breakdown for criminal and civil cases.
4. The total number of letters of inquiry or letters of determination the Justice Department sent to potential FARA registrants. Provide all records.
5. The number of requests for FARA advisory opinions the Justice Department received under 28 C.F.R. § 5.2. Of that number, how many advisory opinions did the Department issue? Provide all records.<sup>10</sup>
6. Provide semi-annual FARA reports to Congress for the period from 2022 to present.<sup>11</sup>
7. The Justice Department's February 5, 2025 memo states that "with respect to FARA and §951, the Counterintelligence and Export Control Section, including the FARA Unit, shall focus on civil enforcement, regulatory initiatives, and public guidance."<sup>12</sup> Please provide details on initiatives related to those areas of focus. Please describe the types of public guidance the Department plans to issue.
8. On January 2, 2025, the Justice Department issued a Notice of Proposed Rulemaking on proposed revisions to the regulations governing FARA. Does the Justice Department plan to continue with this rulemaking update. If not, why not?

Thank you for your attention to this important matter. If you have any questions, please contact my Committee staff at (202) 224-5225.

Sincerely,



Charles E. Grassley

Chairman

Committee on the Judiciary

---

<sup>10</sup> It is unclear if the list of Justice Department's Advisory Opinions linked in its FARA section is comprehensive or illustrative. Further, the opinions contain redactions. See: <https://www.justice.gov/nsd-fara/advisory-opinions>.

<sup>11</sup> On January 13, 2025, my staff requested FARA reports for the past two years. To date, I have not received a response. Email on file with Committee Staff. See: U.S. Department of Justice. FARA Reports to Congress. <https://www.justice.gov/nsd-fara/fara-reports-congress>. (Note: semi-annual reports are publicly available through 2021).

<sup>12</sup> *Id.* at 7.