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The Louis D. Brandeis Center
for Human Rights Under Law

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May 6, 2026

By email (fara.public@usdoj.gov)

The Honorable Todd Blanche
Acting Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

FARA Unit
National Security Division
U.S. Department of Justice
175 N Street, NE
Constitution Square, Building 3 - Room 1.300
Washington, DC 20002

Re: *Georgetown University Violation of Foreign Agents Registration Act*

Dear Mr. Attorney General:

It is now publicly reported in The Washington Free Beacon¹ that Georgetown University (“GU”) had a hitherto secret agreement between GU and Qatar that clearly violates the Foreign Agents Registration Act (“FARA”), 22 USC § 611 *et seq.* According to the reportage, the agreement requires GU to “consult” with them when choosing themes and speakers for certain conferences and events. It also required that they be held in Washington, D.C. According to the House Education Committee, the following is part of this contract:

¹ Georgetown “Islamophobia” Initiative Required to “Consult” with Qatar on Guest Speakers, University Contract with Qatari Regime Reveals (May 5, 2026) (<https://freebeacon.com/campus/georgetown-islamophobia-initiative-required-to-consult-with-qatar-on-guest-speakers-university-contract-with-qatari-regime-reveals/>).

Article (4)

- The University's Bridge Initiative is committed, annually and throughout the duration of this Agreement, to organizing international conferences on the Globalization of Islamophobia and similar themes for the purpose of furthering and disseminating research on this topic. During that process, it will consult with the Islam and Muslims Initiative, which is supported by the Ministry, and consider recommendations regarding sessions, themes and speakers.
- The University shall, practically, organize and host these events and activities in Washington, D.C., in the United States of America, and shall, within its discretion, select and formulate the topics of the sessions and its participants.

There is no doubt that Qatar constitutes a foreign principal. 22 U.S.C. § 611(b). Given the nature of the activities, they fall squarely within the scope of "Political Activities" as defined by the law. An "agent of a foreign principal" includes

(1) any person who acts as an agent, representative, employee, or servant, or any person who acts in any other capacity at the order, request, or under the direction or control, of a foreign principal or of a person any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign principal, and who directly or through any other person—

(i) engages within the United States in political activities for or in the interests of such foreign principal;

(ii) acts within the United States as a public relations counsel, publicity agent, information-service employee or political consultant for or in the interests of such foreign principal;

(iii) within the United States solicits, collects, disburses, or dispenses contributions, loans, money, or other things of value for or in the interest of such foreign principal; . . .

22 U.S.C. § 611(c).

There can be little doubt that putting on a series of conferences to support the Qatari point of view falls squarely within the scope of both subsections (i) and (ii). These so-called conferences and events are simply the presentation of speakers deemed acceptable to Qatar to promote Qatar's point of view in the United States. Indeed, by running the money

through an ostensibly objective institution, it goes to the heart of what the law was originally intended to address – the secret creation of propaganda under the direction of a foreign nation. This is confirmed by the definition of publicity agent under the statute: “The term ‘publicity agent’ includes any person who engages directly or indirectly in the publication or dissemination of oral, visual, graphic, written, or pictorial information or matter of any kind, including publication by means of advertising, books, periodicals, newspapers, **lectures**, broadcasts, motion pictures, or otherwise.” 22 U.S.C. § 611(h) (emphasis added).

Further, although this requires a bit more investigation, the fact that Qatar gives GU money which it then tells GU how to spend on these self-styled conferences and events also falls within the scope of subsection (iii). GU has little discretion on this spending; it spends on the speakers that Qatar designates and pays for events. Thus, it is simply the disbursing agent on behalf of Qatar and would be within the reach of that subsection.

Qatar’s role clearly evinces some level of power over Georgetown and creates some sense of obligation on its part. See, *The Scope of Agency Under FARA*, <https://www.justice.gov/nsd-fara/page/file/1279836/dl?inline>. The requests are specific, they are directly addressed to Georgetown in a legally enforceable document, they are clearly compensated since funds are flowing into Georgetown’s pockets and are part of a larger relationship that Georgetown clearly would not want to jeopardize. *Id.*² Thus, the surrounding circumstances confirm that the FARA agency relationship exists. *Att’y Gen. of U.S. v. Irish N. Aid Comm.*, 668 F.2d 159, 162 (2d Cir. 1982) (“Once a foreign principal establishes a particular course of conduct to be followed, those who respond to its ‘request’ for complying action may properly be found to be agents under the Act.”).

The ineluctable conclusion is that GU has, and has had for some time, an unmistakable obligation to register under FARA. Nor, it would appear, can GU claim that its failure to register is just a merry mix-up. GU is a sophisticated organization in Washington, D.C., with knowledgeable legal counsel.

² It is for the same reason that the exemption contained in § 613(e) is not applicable. This is not funded research, it is a concerted course of action that constitutes “political activities” under FARA: “The term “political activities” means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party. 22 U.S.C. § 611(o) (emphasis added).

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Accordingly, we request that the FARA Unit look into this matter and ensure that the American public be fully informed of Georgetown role not as a neutral presenter of information but the creature of the Qatar government promoting its point of view.

Sincerely,

A handwritten signature in cursive script that reads "Evan Slavitt". The signature is written in black ink and is positioned above the printed name and title.

Evan Slavitt
General Counsel