

Foreign Agents Registration Act (FARA)



We counsel the world's leading businesses and law firms who represent foreign companies, governments, and individuals.

The Foreign Agents Registration Act (FARA) was enacted in 1938 and requires a person acting as an “agent of a foreign principal” to register with the U.S. Department of Justice. For more than seven decades, the statute was rarely invoked by federal prosecutors. But beginning in the mid-2010s, FARA compliance emerged as a priority for federal prosecutors—one that exposes those doing business in the U.S. on behalf of foreign governments, corporations, or individuals to significant scrutiny and legal exposure.

Holtzman Vogel's FARA Group provides counsel regarding all aspects of FARA compliance to clients who do business with foreign principals or act as foreign agents. Clients include:

- Advertising firms
- Consulting firms
- Fortune 500 Companies
- Law firms
- Lobbying firms
- Media companies
- Public relations firms

Specifically, our attorneys advise clients on:

- Whether services they provide or their relationships with clients or owners require registration under FARA
- Registration and reporting requirements under FARA
- Additional obligations of individuals registered under FARA
- Exemptions to FARA's registration and reporting requirements
- Structuring service and vendor agreements to comply with FARA or to qualify for exemptions
- Responding to letters of inquiry from the Department of Justice regarding late, incomplete, or inaccurate registration or reporting under FARA
- Representing clients before the Department of Justice through a FARA audit

- Defending against Department of Justice prosecutions alleging FARA violations