

THE EMIRATI LOBBY:

HOW THE UAE WINS IN WASHINGTON

BEN FREEMAN



FOREIGN
INFLUENCE
TRANSPARENCY
INITIATIVE



CENTER FOR
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While investigations into Russian influence in the 2016 election regularly garner front-page headlines, there is a half-billion-dollar foreign influence industry working to shape U.S. foreign policy every single day that remains largely unknown to the public. The Foreign Influence Transparency Initiative is working to change that anonymity through transparency promotion, investigative research, and public education.

ACKNOWLEDGEMENTS

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Cover photo: Mattis Travels to United Arab Emirates. U.S. Secretary of Defense James N. Mattis arrives at Al Dhafra Air Base, United Arab Emirates, Sept. 7, 2018. Mattis was greeted by Minister of Defense Mohammed bin Rashid Al Maktoum at arrival, ahead of meetings with senior Emirati officials. (DoD photo by Lisa Ferdinando)



EXECUTIVE SUMMARY

In October 2018, after the brutal murder of Saudi Arabian dissident and Washington Post contributor Jamal Khashoggi at the Saudi consulate in Turkey—which U.S. intelligence authorities have concluded was authorized by the Crown Prince of Saudi Arabia Mohammed bin Salman (MBS)¹—Saudi Arabia became something of a pariah in Washington, D.C. Several lobbying and public relations firms dropped the Saudis as a client, some think tanks refused to take Saudi money, and many American universities reevaluated Saudi financial support. On the other hand, Saudi Arabia's close ally, the United Arab Emirates, continues to be seen as a stalwart U.S. ally by most in the nation's capital. While the Emiratis had nothing to do with Khashoggi's murder, they've worked hand-in-hand with the Saudis in the devastating war in Yemen. Emirati involvement in Yemen—including funding a targeted assassination program there²—has contributed to the war there becoming the world's worst humanitarian crisis. And, the UAE, just like Saudi Arabia, has an abhorrent human rights record—arbitrarily detaining and disappearing its own citizens,³ and unlawfully imprisoning Western academics.⁴

How then has the UAE maintained its privileged status? In short, the UAE has a vast and immensely influential lobbying and public relations campaign in America that has allowed the monarchy to exert considerable sway over U.S. policy, while keeping the UAE's indiscretions largely hidden. In this report we attempt to tell the story of that influence operation.

The Foreign Influence Transparency Initiative (FITI), a program of the Center for International Policy, analyzed every Foreign Agents Registration Act (FARA) Supplemental Statement filed in 2018 by organizations working on behalf of clients in the United Arab Emirates. From this analysis we found:

- 20 different firms served as registered foreign agents in the U.S. for clients in the UAE;
- Over \$20 million in payments from UAE clients to these firms;
- 3,168 reported political activities done on behalf of the UAE by those firms;
- UAE foreign agents contacted more than 200 Congressional offices, 18 think tanks, and most mainstream media outlets;
- Considerable interactions between UAE foreign agents and think tanks funded by the UAE;
- Nearly \$600,000 in campaign contributions from these firms and their registered foreign agents;

All of this has contributed to the Emirati lobby's success in shaping U.S. foreign policy. Members of Congress working with Emirati foreign agents continue to fight for U.S. military support to the UAE, Middle East experts—some at think tanks which the UAE has donated millions to—echo the UAE lobby's talking points, and UAE foreign agents have effectively shaped media narratives by working closely with journalists and reporters at nearly every mainstream media outlet.

INTRODUCTION

The UAE is a collection of city-states—Emirates—that have a native population just over one million. Yet, despite its small size, the UAE has enjoyed outsized influence in America for decades. The UAE has immense strategic value to the U.S. for a variety of reasons, not the least of which is that it possesses the world's seventh largest oil reserves.⁵ In addition to oil tying the two countries together, there is a strong military connection, including the U.S.'s 380th Expeditionary Air Wing—which has been instrumental in the fights against ISIS and other terrorist groups in the Middle East—being based in the UAE, and the UAE buying approximately \$27 billion worth of U.S. military weapons and equipment in just the last ten years.⁶

Recently, the U.S. military has been supporting the UAE and Saudi-led coalition in the Yemen war by providing arms and aerial refueling, amongst other efforts. This support had been ongoing for years and was rarely questioned until October 2018, when Saudi Arabian dissident and Washington Post contributor Jamal Khashoggi was brutally murdered at the Saudi consulate in Turkey—an act U.S. intelligence authorities have concluded was authorized by the Crown Prince of Saudi Arabia.⁷ Khashoggi's heinous murder pulled the veneer back on the Saudi monarchy and led to widespread outrage of the Kingdom's brutal human rights record at home and in Yemen. The Saudi-led coalition has been guilty of the deaths of countless civilians—including bombings of weddings and school buses—often using U.S. bombs.⁸

Following Khashoggi's murder, several lobbying, public relations firms, and think tanks ended their relationship with the Saudis. Congress passed multiple resolutions to punish the Saudis. And, generally, the Saudis were seen as something of a pariah in D.C. Yet, Saudi Arabia's close ally, the United Arab Emirates, continues to be seen as a stalwart U.S. ally by most in the nation's capital. While the Emiratis had nothing to do with Khashoggi's murder they've worked hand-in-hand with the Saudis in the devastating war in Yemen—including funding a targeted assassination program there⁹—that has become the world's worst humanitarian crisis. And, the UAE, just like Saudi Arabia, has an abhorrent human rights record—arbitrarily detaining and disappearing its own citizens,¹⁰ and unlawfully imprisoning Western academics.¹¹ Most recently, the UAE launched a crackdown on social media to silence and punish dissidents.¹²

How then has the UAE maintained its privileged status? In short, the UAE has a vast and immensely influential lobbying and public relations campaign in America, that has allowed the monarchy to exert considerable sway over U.S. policy while keeping the UAE's indiscretions largely hidden. While both the UAE's Ambassador in the U.S., Yousef al Otaiba, and the Crown Prince of the Emirate of Abu Dhabi, Mohammed bin Zayed,¹³ are well known for the enormous sway they hold over U.S. policymakers, it's much less understood how the influence operation of the lobbying and public relations firms on the Emiratis' payroll pave the way for these power brokers.

In this report we attempt to tell the story of that influence operation. To do so, the Foreign Influence Transparency Initiative (FITI), a program of the Center for International Policy, analyzed every Foreign Agents Registration Act (FARA) Supplemental Statement filed by organizations working on behalf of clients in the United Arab Emirates in 2018. We cataloged every single “political activity” and campaign contribution reported in those documents. From this analysis we document a multi-pronged approach to image management by the UAE’s foreign agents working in the U.S. The work of these foreign agents includes contacting members of Congress in hopes of maintaining U.S. military support, working hand-in-hand with Middle East experts at think tanks which the UAE has donated millions to, and attempting to shape the narrative of the UAE by contacting nearly every mainstream media outlet.

POLITICAL ACTIVITIES

FARA requires firms to report all political activities conducted on behalf of their foreign principals. The statute has a rather expansive definition of “political activities,” which includes anything that will “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...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.”¹⁴ This definition serves to cover a broad swath of activities FARA registrants do on behalf of their foreign clients, including lobbying, public relations, media outreach, and public sector engagement. It also includes multiple types of interactions, including in person meetings, phone calls, and emails. Thus, collectively, the reports of these activities provide a fairly comprehensive picture of what a country’s FARA registered agents are doing in America.

FARA regulations require this information be reported to a “degree of specificity necessary to permit meaningful public evaluation of each of the significant steps taken by a registrant to achieve the purposes of the agency relation.”¹⁵ As is discussed in detail below, our analysis revealed that many firms failed to meet this threshold, significantly impairing our ability to evaluate the work they did on behalf of their UAE clients. Nonetheless, amongst the firms that did report their work, we cataloged and analyzed 3,168 distinct political activities reported in the filings they made in 2018.

THE FIRMS

20 different firms were registered under FARA to work for clients in the UAE at some point in 2018. The four that reported in their 2018 FARA filings the political activities they conducted on behalf of the UAE are listed in Table 1.

TABLE 1: FIRMS' POLITICAL ACTIVITIES REPORTED ON BEHALF OF UAE CLIENTS IN 2018

FIRM	POLITICAL ACTIVITIES REPORTED
Hagir Elawad & Associates	2,680
Harbour Group	441
Akin, Gump, Strauss, Hauer, and Feld	44
DLA Piper	3

While Hagir, Elawad & Associates reported, by far, the most political activities conducted on behalf of the UAE, a large number of these contacts involved mass email blasts. These political activities were listed under the group's FARA filings as "Wide Distribution," in which Hagir, Elawad contacted roughly 1,967 people across different Congressional offices and Committees. These emails were often Hagir, Elawad sharing op-eds or articles about issues and developments pertaining to the UAE. They were unabashedly pro-UAE, providing staffers with a one-sided take on issues of importance to the Emiratis, particularly their involvement in the Yemen war. For example, on June 15, 2018, Hagir Elawad & Associates disseminated an article¹⁶ by Michael Knights, a senior fellow at the Washington Institute for Near East Policy (WINEP), which argued strongly in favor of UAE efforts to liberate the port city of Hodeidah in Yemen in order to increase humanitarian assistance into the country, while glossing over the fact that aid flows had actually been halted because the Saudi-UAE coalition had "chosen to take Hodeidah's port 'off line.'" As is discussed in greater detail below, most "informational materials" (formerly called propaganda) distributed by UAE foreign agents provide Congress with an extremely one-sided view of issues related to the UAE.

In total, Hagir Elawad & Associates contacted 98 Senate offices and 132 Members of the House. While most of these contacts were via mass emails, more than 200 times Hagir, Elawad's registered foreign agents working for the UAE spoke directly with Congressional staff on the phone or in person.

Behind Hagir Elawad, the Harbour Group reported the most political activities conducted on behalf of the UAE in 2018. All of this work was done on behalf of two clients in the UAE—the Embassy of the UAE and the Executive Affairs Authority of Abu Dhabi. The latter is a government agency whose sole mission is to provide strategic policy advice to the Crown Prince of Abu Dhabi, Mohamed bin Zayed.¹⁷

Unlike Hagir Elawad, the Harbour Group's focus was not on Congress, whom they contacted just four times. Instead the firm focused heavily on influencing think tanks and other non-profits (248 contacts) and media (120 contacts).

Rounding out the list of firm's reporting political activity on behalf of the UAE in 2018 are Akin, Gump and DLA Piper. While these are two of the most influential lobbying operations in America—in fact Akin, Gump has been, by far, the top lobbying firm in D.C. over the past twenty years, with total lobbying revenue topping \$632 million, according to the Center for Responsive Politics¹⁸—their work for the Emiratis was rather limited. In its 2018 FARA filings Akin, Gump reported just 44 political activities done on behalf of the Embassy of the UAE despite being paid more than \$6 million by the Emiratis.¹⁹ And, DLA Piper reported sending just two emails and making one phone call on behalf of the UAE before terminating their relationship with the Embassy in March 2018, but not before receiving \$105,000 in compensation.²⁰

Notably, the Harbour Group and Akin, Gump were registered to represent clients in both the UAE, and their close allies, Saudi Arabia in 2018. Shortly after the brutal murder of Washington Post contributor Jamal Khashoggi at the Saudi consulate in Turkey in October 2018—which U.S. intelligence authorities have concluded was authorized by the Saudi Crown Prince²¹—the Harbour Group dropped Saudi Arabia as a client,²² but Akin, Gump did not.

More generally, while there are many differences between Saudi and Emirati influence operations in America, there has been one very common thread—Yemen. As our previous reports on the Saudi lobby have documented,²³ Saudi Arabia's foreign agents have been focused heavily on stifling legislation that would curtail or end U.S. support for the Saudi and UAE coalition's war in Yemen, which has led to the deaths of more than 17,000 civilians and resulted in the world's worst humanitarian crisis according to the United Nations.²⁴ Until the UAE announced this summer that it was removing forces from Yemen,²⁵ it was a co-belligerent in this conflict for years, so it is not surprising to note that many of the activities these firms reported doing on behalf of the UAE in 2018 were also related to this devastating conflict. In fact, more than half of all reported political activities conducted by FARA registered foreign agents representing the UAE in 2018 were explicitly related to Yemen.

ORGANIZATIONS CONTACTED

As Table 2 shows, because of the mass emails sent to Congressional offices by Hagir, Elawad, Congress was, by far, the most common target of the political activities of UAE foreign agents. But even excluding these emails, UAE foreign agents contacted Congress more than 200 times and had a rather diffuse approach. They contacted more than 50 individual Congressional offices. Yet, other than the former Speaker of the House, Paul Ryan (R-WI), whom they contacted 13 times, no member of Congress was contacted more than four times. UAE foreign agents instead focused their efforts on Congressional Committees, specifically contacting staff on the Senate Foreign Relations, Intelligence, and Judiciary Committees more than two dozen times.

TABLE 2: TOP FIVE TYPES OF ORGANIZATIONS MOST CONTACTED BY UAE FOREIGN AGENTS

TYPE	TIMES CONTACTED
Congress	2,609
Non-profit	164
Media	131
Executive Branch	88
Think Tank	85

Behind Congress, the most common targets of UAE foreign agents were non-profit organizations. While foreign agents contacting non-profits isn't uncommon, the UAE's foreign agents make an extraordinary commitment to this subtle form of influence. For the UAE, interactions with non-profits help to bolster the country's image in the U.S., increase research and business collaborations, and provide a vehicle for charitable giving from the Emiratis.

As shown in Table 3, the most contacted non-profit by UAE foreign agents was the Smithsonian Institution. In late 2017 the UAE signed a memorandum of understanding with the D.C. based museum that "will enhance cultural exchanges and create new opportunities for collaboration between the Smithsonian Institution and UAE-based cultural and research organizations."²⁶ Amongst other issues, UAE foreign agents met with Smithsonian staff about participation in the Smithsonian's Folklife Festival. Their efforts appear to have been successful as the Smithsonian recently announced that the UAE will be one of the featured countries at this iconic D.C. festival in 2020.²⁷

Behind the Smithsonian, the most contacted non-profits by UAE foreign agents were the American Jewish Committee (AJC) and the United Way of Collier County. The AJC was contacted primarily regarding coordinating a trip for representatives of the organization to visit the UAE, as was another Jewish organization, the Conference of Presidents of Major American Jewish Organizations. This coincides with increasingly closer ties between the UAE and Israel on regional security issues, most notably their joint opposition to Iran.

The United Way was contacted regarding a \$2.7 million grant the Emiratis gave to Collier County to provide relief to the Naples Florida area following Hurricane Irma.²⁸ The grant to the Naples area was part of a larger \$10 million grant from the UAE across the state of Florida, and in at least one city—Jacksonville—the City Council openly debated refusing the gift, with some local activists calling it "blood money."²⁹

TABLE 3: TOP TEN NON-PROFITS CONTACTED BY UAE FOREIGN AGENTS

NON-PROFIT	TIMES CONTACTED
Smithsonian	27
American Jewish Committee	17
United Way of Collier County	17
Anti-Defamation League	16
Conference of Presidents of Major American Jewish Orgs	8
Meridian International	8
Business Executives for National Security	7
US-UAE Business Council	7
Children's National Medical Center	6
Cleveland Clinic	6

In addition to non-profits and Congress, UAE foreign agents devoted considerable attention to shaping media narratives related to the UAE. The top ten media organizations contacted by UAE foreign agents are listed in Table 4. The most contacted media outlet by UAE foreign agents was the Washington Post. Six reporters at the Post were contacted by UAE foreign agents on a number of issues, including Yemen, the Gulf Dispute, and Iran. All but one of these contacts were made by the Harbour Group's Richard Mintz, who effectively serves as UAE Ambassador Otaiba's public relations spokesperson.

While the Washington Post being the most contacted media outlet is perhaps unsurprising for a foreign power looking to influence Washington's take on foreign policy, the second media outlet on the list is much less recognizable. But, the Harbour Group developed a rather cozy relationship with OZY, a new media outlet branded as "news for the disruptive."³⁰ The Harbour Group's courtship of OZY, which included pitching stories and arranging interviews for OZY journalists, led to articles that were quite flattering for the Emiratis, including one on Dubai's "Museum of the Future,"³¹ and another declaring Dubai as, "one of the world's new fashion capitals,"³² which doesn't mention that violations of Dubai's strict dress code are punishable by up to three years in prison.³³

The remainder of the list in Table 4 consists largely of mainstream media outlets, with one notable exception, The National, which is actually a UAE based news organization that claims to be "the Middle East's leading English language news service."³⁴ All of the contacts to The National were made by the Harbour Group to Joyce Karem, including a meeting between Harbour Group foreign agent Seth Horwitz with Karem on March 6, 2018 to discuss the UAE Ambassador's trip to Houston. Perhaps not coincidentally two days later Karem published a piece highlighting the Ambassador's trip to open a new consulate in Houston, while also touting the UAE's philanthropic efforts.³⁵

It's worth noting that while registered foreign agents publishing work on behalf of a foreign power are required by law to include a "conspicuous statement" that explains whom they're working for,³⁶ there is no requirement for media to disclose when they're working closely with a foreign agent to produce a story.

TABLE 4: TOP TEN MEDIA ORGANIZATIONS CONTACTED BY SAUDI FOREIGN AGENTS

MEDIA	TIMES CONTACTED
Washington Post	16
Ozy	12
Wall Street Journal	11
Bloomberg News	10
Fox News	10
Politico	8
The National	8
Associated Press	7
The New York Times	7
Foreign Policy Magazine	5

In addition to Congress, non-profits, and media, think tanks were a key focus of the political activities of the UAE's foreign agents. The most contacted think tanks are listed in Table 5.

TABLE 5: TOP FIVE THINK TANKS MOST CONTACTED BY UAE FOREIGN AGENTS

THINK TANK	TIMES CONTACTED
Washington Institute for Near East Policy	18
Middle East Institute	14
Center for American Progress	11
American Enterprise Institute	10
Center for Strategic and International Studies	5

UAE foreign agents directed their efforts towards some of the most prominent and influential think tanks in D.C. and towards experts at think tanks the UAE was directly or indirectly funding. In turn, UAE foreign agents often help to distribute the work of these

experts at think tanks the UAE is funding. This creates a symbiotic relationship between UAE funded think tanks and the UAE's foreign agents.

For example, Policy Impact Strategic Communications in its representation of the UAE reported in its FARA filing³⁷ receiving \$225,000 to create a series of documentaries attacking Qatar and the U.S.-Qatari relationship, entitled "A Dangerous Alliance."³⁸ While viewers can see a disclaimer that the videos were created on behalf of Lapis Middle East and Africa, they're never told that Lapis is a UAE based communications firm, or that nearly all of the think tank experts featured in the videos reviling Qatar work at think tanks that have received millions directly or indirectly from the UAE.³⁹ For example, the Foundation for Defense of Democracies and the Hudson Institute, whose experts are featured in the video, reportedly received part of a \$2.7 million package to host anti-Qatari conferences, through a scheme hatched by George Nader, an advisor to the Emirati government.⁴⁰ Meanwhile, the Middle East Institute, whose expert is also cited in the videos, received a much more direct, and sizeable, infusion of money from the UAE in the form of a "secret" \$20 million donation shepherded by the UAE Ambassador, the details of which were later leaked to *The Intercept*.⁴¹ It is perhaps unsurprising then that our analysis showed the Middle East Institute was the second most contacted think tank by FARA registered foreign agents and the think tank hosted an event with the UAE Ambassador in 2018.

The Center for American Progress (CAP) also found itself at this nexus of Emirati influence in 2018. According to CAP's records the think tank has received between \$1.5 and \$3 million dollars from the UAE since 2014.⁴² Additionally, UAE foreign agents contacted Brian Katulis, a Middle East expert at CAP, at least 11 times according to their 2018 FARA filings, primarily regarding a "CAP group trip to UAE/KSA" in late April and early May 2018. Katulis' primary contact was Richard Mintz of the Harbour Group.⁴³

These UAE ties came into question after the brutal murder of Jamal Khashoggi. Following the killing, CAP released a response condemning the Saudis for their involvement in Khashoggi's murder, but not calling for specific consequences to punish the Kingdom.⁴⁴ According to reporting by *The Intercept*'s Ryan Grim, those consequences were stripped from the statement by a CAP staffer—Brian Katulis.⁴⁵ Then, in December, CAP largely sat on the sidelines as the Senate passed a historic resolution to end US involvement in the devastating Saudi-UAE war in Yemen.⁴⁶

After the *Intercept* story ran CAP announced that it would no longer accept funds from the UAE.⁴⁷ CAP fired two staffers as a result of the *Intercept* story, but not Katulis.⁴⁸ In fact, just a month later Katulis spoke at an MEI event, in a building the UAE's \$20 million donation helped pay for, entitled "The Role of Think Tanks in Shaping Middle East Policy." In his comments, Katulis said "I've never had to worry in my years at CAP about an analyst or me saying X, Y, and Z and worry about a funding source. Never thought about it. Never."⁴⁹ He also dismissed those giving "energy and dynamism" to "the Yemen debate" for ignoring "the full complexity of the challenges." Jamal Khashoggi's name wasn't even mentioned.⁵⁰

But, UAE foreign agents don't just contact experts at think tanks the country funds. Most notably, the most contacted think expert by UAE foreign agents was Michael Knights of the Washington Institute for Near East Policy (WINEP), which explicitly states it does not accept any foreign funding.⁵¹ Knights, however, appears to have an extremely close relationship with Richard Mintz, the Managing Director of the Harbour Group. According to the Harbour Group's 2018 FARA filings the two spoke or emailed about the UAE at least 18 times. One of the primary topics of these conversations was four separate trips to Yemen Knights made in 2018 to embed with UAE forces there. Knights wrote a series of articles in 2018 and late 2017 surrounding these trips, and summarized his experience following the UAE's announcement this July that it was withdrawing its forces from Yemen.⁵²

While Knights' experiences provide an extraordinary look into UAE operations in Yemen, he consistently provides a one-sided view of the UAE's role there and completely ignores the serious transgressions committed by the UAE in Yemen. Despite bemoaning that "people only remember the bad stuff" about the UAE in Yemen, Knights never actually mentions any of the bad stuff.⁵³ For example, not once in any of his pieces does Knights acknowledge the UAE funded a targeted assassination program in Yemen,⁵⁴ that it ran a network of secret prisons where prisoners were tortured,⁵⁵ or that UAE forces have given US weapons to al-Qaeda militants in Yemen.⁵⁶

Moreover, Knights' commentaries have both been distributed as "informational materials" (formerly called propaganda) by UAE lobbyists—specifically, Knights' op-eds have been the subject of Hagir, Elawad's email blasts to Congress—and sometimes mirrored the talking points in other UAE propaganda. In one case Knights' commentary mirrored UAE talking points that were published, and distributed by UAE foreign agents, the exact same day. On June 14, 2018 Knights published an article supporting the UAE's battle to liberate the key Yemen port of Hodeidah from the Houthis.⁵⁷ Many of Knights' arguments mirrored the talking points of the UAE's Minister of State for Foreign Affairs that were distributed by UAE foreign agents on the exact same day Knights published his opinion piece.⁵⁸ For example, both decry the flow of "Iranian arms" through the port and assert the need for liberating the port to provide humanitarian relief to Yemen, while both fail to mention that the United Nations and others have found that the Saudi-UAE blockade of Yemen, including the port of Hodeidah, and their military operations in the country were the primary cause of the need for aid in the first place.⁵⁹

While it's commendable of Knights to note on Twitter that he is "not an unbiased observer" because of his experiences with the UAE armed forces,⁶⁰ the average reader of his work has little way of knowing of his ties to UAE lobbyists or that his work echoes propaganda distributed by UAE's foreign agents.

This points to a critically important distinction in transparency between think tanks and lobbying firms when it comes to their relationships with foreign governments. Specifically, a country's foreign agents have to register under FARA and report the work they do on behalf of that country, while a think tank funded by a foreign government

doesn't have to reveal any of the work they do on that countries behalf. In fact, the think tank doesn't even have to disclose they received any money from the foreign government.⁶¹ Think tanks are presumably not required to register under FARA due to an exemption for "bona fide...scholastic, academic, or scientific pursuits,"⁶² even when the work of think tank experts appears to resemble the work of foreign agents, and even when the two directly collaborate.

THE LACK OF TRANSPARENCY IN UAE FARA FILINGS

It's important to note that everything discussed here comes from an analysis of a floor, not a ceiling, of the political activity done on behalf of foreign agents registered to represent interests in the UAE. A major reason for this is the widely divergent levels of transparency amongst FARA registrants that our analysis revealed. For example, the Harbour Group lists every covered political activity its agents engaged in on behalf of the UAE, including details such as the date, people involved, and a description of what issues the communication pertained to. This level of detail corresponds with the requirements of the FARA statute, specifically section §5.210.⁶³ On the other hand, many firms do not fully report details of the political activities they conduct on behalf of their UAE clients. For example, Definers Corp., which was hired by Akin, Gump to assist with work on behalf of the Embassy of the UAE, reports in its FARA filing that the firm's work included "one-on-one interactions with members of the news-media in the United States to support and promote the aforementioned interests of the Embassy."⁶⁴ However, the firm provides no additional details about these political activities, as Akin, Gump does in its filings.⁶⁵ In a FARA filing Greenwich Media Strategies also reported "assisting media outreach efforts and media relations, reaching out to experts and UN and US officials," in its work to assist The Harbour Group's representation of the Embassy of the United Arab Emirates.⁶⁶ Yet, unlike the Harbour Group, the firm provides no details about any of this political activity.

Similarly, the Camstoll Group, in its work for Outlook Energy Investments (which is wholly owned by the Emirate of Abu Dhabi), reports having "conducted outreach to think tanks, business interest, government officials, media and other leaders in the United States regarding issues related to illicit financial activity," yet provides details about none of this activity in the firm's FARA filings.⁶⁷ The Camstoll Group—which within ten days of its founding in late 2012 signed a contract with Outlook Energy Investments that would earn the firm a whopping \$400,000 monthly consulting fee⁶⁸—had been reporting the details of its political contacts on behalf of Outlook Energy Investments in all FARA Supplemental Statements prior to 2018, but hasn't reported a single political activity since, despite receiving nearly \$14 million from its Abu Dhabi client in the past two years. This lack of disclosure is particularly troubling given that previous investigative reporting, relying on the firm's FARA disclosures, was able to show direct links between the firm's work and multiple media reports critical of illicit financial activity in Qatar.⁶⁹

This rampant lack of transparency amongst FARA registrants working for the UAE

appears to contradict FARA requirements that firms provide a level of “specificity necessary to permit meaningful public evaluation of each of the significant steps taken by a registrant to achieve the purposes of the agency relation.”⁷⁰ Given that none of the “significant steps,” let alone “each” step, is listed in many of these firms’ FARA filings, it’s difficult to say this threshold has been met.

This lack of disclosure places significant restraints on the analysis in this report and any analysis of Emirati influence in America. It prohibits the public from knowing the full extent of the work these firms have conducted on behalf of the UAE and impedes efforts to track the results of that work, like seeing if media contacted by UAE foreign agents produce stories favorable to the UAE. It also unjustifiably punishes firms that do correctly follow FARA reporting requirements and gives them a perverse incentive to disclose less information in the future, which could ultimately lead to a downward spiral of less and less transparency that would leave the public with little idea of what foreign powers are doing to wield influence in America.

POLITICAL CONTRIBUTIONS

In 2018 firms registered under FARA to represent clients in the UAE reported making \$599,095 in campaign contributions. All of these contributions came from just four firms—Akin, Gump, DLA Piper, Glover Park Group, and Harbour Group—with Akin, Gump donating almost half of all the campaign contributions reported in FARA 2018 filings by firms representing UAE interests.

TABLE 6: TOP TEN CONGRESSIONAL RECIPIENTS OF CAMPAIGN CONTRIBUTIONS FROM FIRMS REPRESENTING THE UAE IN 2018

RECIPIENT	CONTRIBUTIONS
Sheldon Whitehouse (D-RI)	\$16,200
Paul Ryan (R-WI)	\$11,500
Heidi Heitkamp (D-ND)	\$10,250
Dianne Feinstein (D-CA)	\$9,700
Robert Menendez (D-NJ)	\$9,100
Jon Tester (D-MT)	\$9,050
Doug Jones (D-AL)	\$8,236
Chris Murphy (D-CT)	\$8,000
Josh Gottheimer (D-NJ)	\$8,000
Ed Markey (D-MA)	\$7,750

There's an obvious similarity amongst nearly all the top recipients of contributions from firms representing UAE clients, as listed in Table 6—they're Democrats. In fact, amongst the top ten recipients of contributions from firms representing UAE interests in 2018, only Paul Ryan (R-WI) is a Republican. Despite the significant amounts of money that flowed into campaign coffers from UAE's foreign agents there's little connection between these contributions and the political activity reported by the UAE's lobbyists. In fact, just one politician, Kirsten Gillibrand (D-NY) both received a campaign contribution from a firm (Akin, Gump) representing the UAE and had her office contacted by that same firm on behalf of the UAE.⁷¹ And, even in this lone example, the contact and contributions were separated by months, and thus don't appear to be related. All of this stands in stark contrast to the Saudi lobby which, as the Center for International Policy has previously documented,⁷² annually makes hundreds of thousands of contributions to the very same members of Congress its lobbyists contact on behalf of the Kingdom, in some cases making the contact and contribution on the exact same day.

Other big recipients of contributions from firms representing the UAE went to The Democratic Governors Association and Rahm Emanuel, the former Mayor of Chicago, who each received a total of \$15,000 in campaign contributions from these firms and their registered foreign agents.

CONCLUSION: EMIRATI INFLUENCE IN AMERICA TODAY

To be sure, this report only documents the tip of the iceberg of the UAE's influence in the U.S. This report does not analyze oil and business interests between the UAE and the U.S. It also only passingly discussed the considerable sums of money Emiratis spend on other influence activities, including the millions they spend on think tanks, and the hundreds of millions of dollars they've spent at American universities, for example.⁷³ It also only tangentially touches on the considerable influence that Abu Dhabi Crown Prince Mohammed bin Zayed appears to hold within the Trump administration and the sway of the UAE's Yousef al Otabia, who has been called "Washington's most powerful ambassador," due in no small part to his notoriously lavish parties.⁷⁴

This report also does not discuss misinformation operations conducted by the Emiratis including, for example, the vast program of "coordinated inauthentic behavior" that was shut down on Facebook and Instagram this summer.⁷⁵

All these caveats aside, the UAE influence operation unearthed in this analysis of FARA records is immense. Just from 2018 FARA filings by firms registered to represent the UAE we found:

- 20 different firms served as registered foreign agents in the U.S. for clients in the UAE;
- Over \$20 million in payments from UAE clients to these firms;

- 3,168 reported political activities done on behalf of the UAE by those firms;
- UAE foreign agents contacted more than 200 Congressional offices, 18 think tanks, and most mainstream media outlets;
- Considerable interactions between UAE foreign agents and think tanks funded by the UAE;
- Nearly \$600,000 in campaign contributions from these firms and their registered foreign agents;

While the UAE announcing earlier this summer that it was scaling down its military presence in Yemen was welcome news, the Emirates, like their allies in Saudi Arabia, have exhibited troubling behavior that should give pause to anyone in the U.S. concerned with human rights, democratization, or stability in the Middle East. Though the Emirati's influence operation differs notably from the Saudi's in many ways, both rely heavily on their FARA registered lobbying and public relations firms to brandish their image in the U.S., and to keep their transgressions out of the public consciousness as much as possible. The Saudi's influence operation has failed to do this in many ways after the murder of Jamal Khashoggi, but the UAE's influence operation has remained incredibly effective. As of September 2019, the Emirati's still have 19 FARA registered firms on their payroll,⁷⁶ which are working right now to provide this small country with an outsized influence on U.S. foreign policy.

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2000 M Street, NW Suite 720

Washington, DC 20036

T: +1 202 232 3317

E: info@internationalpolicy.org

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