



QUINCY INSTITUTE  
FOR RESPONSIBLE  
STATECRAFT

# The Emirati Lobby in America

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**Ben Freeman**

Research Fellow

Quincy Institute for Responsible Statecraft

# Executive Summary

The United Arab Emirates (UAE) has exerted considerable influence in its region in recent years and has also been a major factor in U.S. foreign policy. The UAE military and its proxies fought for years in Yemen and still maintain significant influence there, despite a 2020 pledge to withdraw from the devastating conflict. The UAE and other Gulf states have normalized relations with Israel under the auspices of the Abraham Accords. The UAE also continues to receive billions of dollars worth of U.S. military equipment and weapons. On the soft power side, the UAE played host to World Expo 2020, also known as the Expo 2020 Dubai, a cultural event that brought together representatives from nearly every country in the world.

*25 organizations were registered under FARA to work on behalf of Emirati clients in 2020 and 2021; Those organizations reported making 10,765 contacts on behalf of their Emirati clients; Emirati clients paid over \$64 million to firms representing them.*

A small army of U.S.-based lobbyists working on behalf of the UAE has played a role in all these events, and in nearly every aspect of U.S. foreign policy in the Middle East. Based on an exhaustive analysis of all Foreign Agents Registration Act (FARA) documents filed by organizations registered to work on behalf of UAE clients in 2020 and 2021, this brief offers a number of key findings regarding legal lobbying activities of the UAE in the United States, including the following:

- In 2020 and 2021, 25 organizations were registered under FARA to work on behalf of Emirati clients;

- Those organizations reported making 10,765 contacts on behalf of their Emirati clients;
- Emirati clients paid over \$64 million to firms representing them;
- These firms and their registered foreign agents reported making over \$1.65 million in political contributions, with more than half a million dollars going to members of Congress these firms contacted on behalf of their Emirati clients;
- The UAE's lobbying efforts, including leveraging the Abraham Accords, was aimed at garnering contracts for tens of billions of dollars in advanced military materiel, including F-35s. These efforts had mixed success. The Emirati Lobby's push for greater U.S.–UAE military ties found some success in the Biden administration's pledge of a formal security pact with the UAE. These lobbying efforts could lead to outcomes not in the interests of the United States.

## Introduction

In November 2022 the Washington Post reported that, “U.S. intelligence officials have compiled a classified report detailing extensive efforts to manipulate the American political system by the United Arab Emirates,” including “ illegal and legal attempts to steer U.S. foreign policy in ways favorable to the Arab autocracy.”<sup>1</sup> According to the Post, the report was compiled by the National Intelligence Council and shared with top policymakers. In short, UAE meddling in American politics has now risen to the level of a national security concern in the intelligence community.

While the report remains classified and not publicly available, many of the UAE's attempts to meddle in American politics are well known. The United States has cooperated with the UAE on a number of key foreign policy issues, even as the UAE has gone to great lengths to further its influence in Washington, via both legal and illegal means. One salutary example is the case of Lebanese–American businessman George

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<sup>1</sup> Hudson, John. “U.S. intelligence report says key gulf ally meddled in American politics.” The Washington Post, November 12, 2022. <https://www.washingtonpost.com/national-security/2022/11/12/uae-meddled-us-politics-intel-report/>.

Nader, who pleaded guilty to charges of funneling millions of dollars into U.S. elections on behalf of the UAE.<sup>2</sup>

In one example of the UAE's legal influence efforts, U.S. military entanglements with the UAE were recently highlighted by the Washington Post and Project On Government Oversight revelations that 280 former U.S. military personnel had been legally working as contractors and consultants for the UAE.<sup>3</sup> This included a number of former generals and admirals, including General Jim Mattis, who served as Secretary of Defense during the Trump administration, after serving as an advisor to the UAE military. The UAE legally offered these former U.S. servicemembers extremely generous compensation packages that could exceed a quarter-million dollars for even lower-ranking personnel. According to the Post investigation, this raised questions about whether these arrangements posed a conflict of interest for service members, like Mattis, who would then go on to work for the U.S. government again.<sup>4</sup>

In addition to offering lavish compensation packages to former U.S. military personnel, the UAE has also spent billions of dollars purchasing U.S. military equipment and weapons. In fact, the UAE is the third-largest recipient of U.S. weapons in the last five years, behind only Afghanistan and Saudi Arabia, according to a Quincy Institute report by William Hartung.<sup>5</sup>

At the same time, however, UAE forces and their proxies fighting in the devastating Yemen war have been accused of torture, the indiscriminate killing of civilians, and other

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<sup>2</sup> Cole, Matthew. "UAE adviser illegally funneled foreign cash into Hillary Clinton's 2016 campaign. *The Intercept*, January 16, 2022.

<https://theintercept.com/2022/01/16/uae-2016-election-trump-clinton-george-nader/>.

<sup>3</sup> Whitlock, Craig and Nate Jones. "UAE relied on expertise of retired U.S. troops to beef up its military." *The Washington Post*, October 18, 2022.

<https://www.washingtonpost.com/investigations/interactive/2022/uae-military-us-veterans/> and McClure, Julianne. "State Dept Is Quietly Approving Former Servicemembers' Work for Foreign Interests. That's a Problem." *The Project on Government Oversight*, October 18, 2022.

<https://www.pogo.org/investigation/2022/10/state-dept-is-quietly-approving-former-servicemembers-work-for-foreign-interests-thats-a-problem>

<sup>4</sup> *ibid.*

<sup>5</sup> Hartung, William. "Appendix: Major U.S. arms sales under the Biden administration, January 2021 to October 2022." *The Quincy Institute*, October 20, 2022.

<https://quincyinst.org/wp-content/uploads/2022/10/QUINCY-PAPER-NO.-9-INDEX.pdf>.

war crimes.<sup>6</sup> Even after withdrawing most of its troops from Yemen in 2020, the UAE continued to back several non-state armed groups through direct training, capacity building, and logistical support – and by paying their salaries.<sup>7</sup> Throughout the Yemen war the UAE and Saudi Arabia, its partner in the conflict, have continued to receive U.S. military support and weapons, in addition to advice the UAE has received from the U.S. military advisors on its payroll.

## *UAE meddling in American politics has now risen to the level of a national security concern in the intelligence community.*

Though military entanglements are a major component of the U.S.–UAE relationship, diplomatic ties led to implementation of the 2020 Abraham Accords, which led to the normalization of relations between Israel and the UAE, Bahrain, Morocco, and Sudan. While the Abraham Accords were billed as a step towards peace in the Middle East – even though the signatories were not at war – these “peace” agreements were used to increase, not reduce, the militarization of U.S. foreign policy in the Middle East. For example, and as discussed in much greater detail below, the UAE leveraged the normalization of relations with Israel to push for even greater U.S. military entanglements, including obtaining some of the most advanced weapons in the U.S. military’s arsenal and a formal security agreement with the United States.

These and many more economic and military issues driving U.S. foreign policy in the Middle East have all been heavily influenced by Emirati interests that are often at odds with U.S. interests. A number of illicit influence operations orchestrated by the UAE government – including funneling millions of dollars into U.S. elections<sup>8</sup> – have all

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<sup>6</sup> Cumming–Bruce, Nick. “War Crimes Report on Yemen Accuses Saudi Arabia and U.A.E.” *The New York Times*, August 28, 2018.

<https://www.nytimes.com/2018/08/28/world/middleeast/un-yemen-war-crimes.html>.

<sup>7</sup> Jalal, Ibrahim. “The UAE may have withdrawn from Yemen, but its influence remains strong.” *The Middle East Institute*, February 25, 2020.

<https://www.mei.edu/publications/uae-may-have-withdrawn-yemen-its-influence-remains-strong>.

<sup>8</sup> Cole, Matthew. “UAE adviser illegally funneled foreign cash into Hillary Clinton’s 2016 campaign.” *The Intercept*, January 16, 2022.

<https://theintercept.com/2022/01/16/uae-2016-election-trump-clinton-george-nader/>.

grabbed headlines. Yet, behind the scenes, each of these issues has been the object of a sizable legal UAE influence operation. This includes an extraordinary amount of lobbying, public relations, and related attempts at influence by UAE foreign agents in the U.S., referred to here as the Emirati Lobby.<sup>9</sup>

This report aims to provide an analysis of this legal component of the UAE's influence operations in the U.S. and does not delve further into the UAE's illicit election and political interference operations.<sup>10</sup> This report also focuses solely on Foreign Agents Registration Act (FARA) registrants working for UAE clients in 2020 and 2021. Even within the limits of this research scope, the Emirati lobby's work is remarkable. In just this two-year period Emirati interests were represented by 25 firms in the U.S.; those firms reported contacting policymakers, media, think tanks, and others an astounding 10,765 on behalf of their Emirati clients. Their Emirati clients paid them more than \$64 million for this work.<sup>11</sup> This makes the Emirati Lobby one of the most well financed foreign lobbies, according to OpenSecrets;<sup>12</sup> its reported political activities outstrip even those of the notoriously aggressive Saudi lobby.<sup>13</sup>

To conduct this analysis, my colleagues at the Quincy Institute and I analyzed every FARA document filed by organizations registered to work on behalf of Emirati clients in

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<sup>9</sup> In this report, "Emirati lobby" is synonymous with the Foreign Agents Registration Act (FARA) registered firms and individuals working on behalf of Emirati clients. It encompasses more than just lobbying. As is shown throughout this report, the Emirati lobby does far more than just lobbying Congress and the Executive branch. It also sought influence at a number of media outlets and think tanks, for example. The Emirati lobby as mentioned in this report also refers to more than just the lobbyists working on behalf of the UAE government. It includes public relations, consults, and other entities registered under FARA to work for non-governmental entities in the UAE as well.

<sup>10</sup> Cole, Matthew. "UAE adviser illegally funneled foreign cash into Hillary Clinton's 2016 campaign." *The Intercept*, January 16, 2022.

<sup>11</sup> This is revenue that was reported in 2020 and 2021 filings. This money may not necessarily have been received in these years and may not have been intended to pay for work conducted in these years. This is because there are no standardized reporting periods for FARA filings. A firm may receive payment for work it has done previously, or for work it is expected to do, and does not have to indicate which is the case in its FARA filings. In this analysis, all spending figures were those reported in 2020 and 2021 FARA filings, unless otherwise noted.

<sup>12</sup> "Foreign Lobby Watch." OpenSecrets. November, 2022. <https://www.opensecrets.org/fara>.

<sup>13</sup> Freeman, Ben. "The Saudi Lobby in 2020." Center for International Policy, May, 2021. [https://3ba8a190-62da-4c98-86d2-893079d87083.usfiles.com/ugd/3ba8a1\\_a3f4d1858a9d4afb96f019a206573810.pdf](https://3ba8a190-62da-4c98-86d2-893079d87083.usfiles.com/ugd/3ba8a1_a3f4d1858a9d4afb96f019a206573810.pdf).

2020 and 2021.<sup>14</sup> From these documents, we recorded every single “political activity” done for those clients, “informational materials” distributed on behalf of these clients, the funds these organizations reported receiving from Emirati clients, and the campaign contributions made by these firms and the registered foreign agents working for them.<sup>15</sup> We then analyzed all of this in an attempt to follow the money, connect the dots, and provide the public with a better understanding of the legal channels Emirati interests have used to influence U.S. foreign policy.

The remainder of this brief proceeds in three parts. The next section, “The Emirati Lobby by the numbers” provides a summary of the Emirati Lobby’s work, including the political activities they reported and the money they donated to members of Congress. The subsequent “Issues” section then goes into detail about how the Emirati lobby worked to shape U.S. foreign policy on a number of key issues, including the Abraham Accords and arms sales to the UAE. Finally, the “Key findings” section offers a brief conclusion.

## **The Emirati lobby by the numbers**

This section provides an overview of the U.S. lobbying, public relations, and other firms registered under FARA that were working for Emirati interests in 2020 and 2021. It provides statistics on the activities they conducted, the money they received, and the money they donated to political campaigns in the United States. The subsequent “Issues” section attempts to document how all of this work advanced Emirati interests on several specific issues.

### **An overview of the Emirati lobby’s reported political activities**

The Quincy Institute’s analysis of FARA filings reveals that foreign agents working for the UAE were extraordinarily busy. In this two year period, they reported some 10,765 political activities. On a per year basis, this is far more reported political activities than

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<sup>14</sup> All of these documents are publicly available and can be found on the FARA website: <https://www.justice.gov/nsd-fara>

<sup>15</sup> Because FARA does not have fiscal years or standardized reporting periods, and the supplemental statements, which contain much of this information, cover a six-month reporting period, some of the political activities and contributions reported in 2020 occurred in late 2019. Similarly, some of the activities and contributions of late 2020 will only be reported in the first half of 2021.

the remarkably active Saudi lobby.<sup>16</sup> And, to be sure, this is a floor, not a ceiling, of all the work done on behalf of UAE interests in the United States. The 25 firms registered under FARA to work for UAE clients differed in the level of transparency afforded in their FARA filings. Akin, Gump, Strauss, Hauer, & Feld (henceforth referred to as Akin Gump), the highest paid and most active firm in the Emirati lobby, provided a commendable level of transparency and detail in all of the firms' FARA filings. On the other hand, several firms working for Emirati clients provided little or no details about their political activities, despite FARA regulations requiring activities be reported with "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."<sup>17</sup> The Glover Park Group, for example, reported helping the Abu Dhabi Investment Authority "in building relationships with Washington thought leaders and policymakers," but provided no further details about who these thought leaders were, when their agents met with them, and what they discussed.<sup>18</sup> Notwithstanding these caveats, the most active firms in the Emirati lobby are listed in Table 1.

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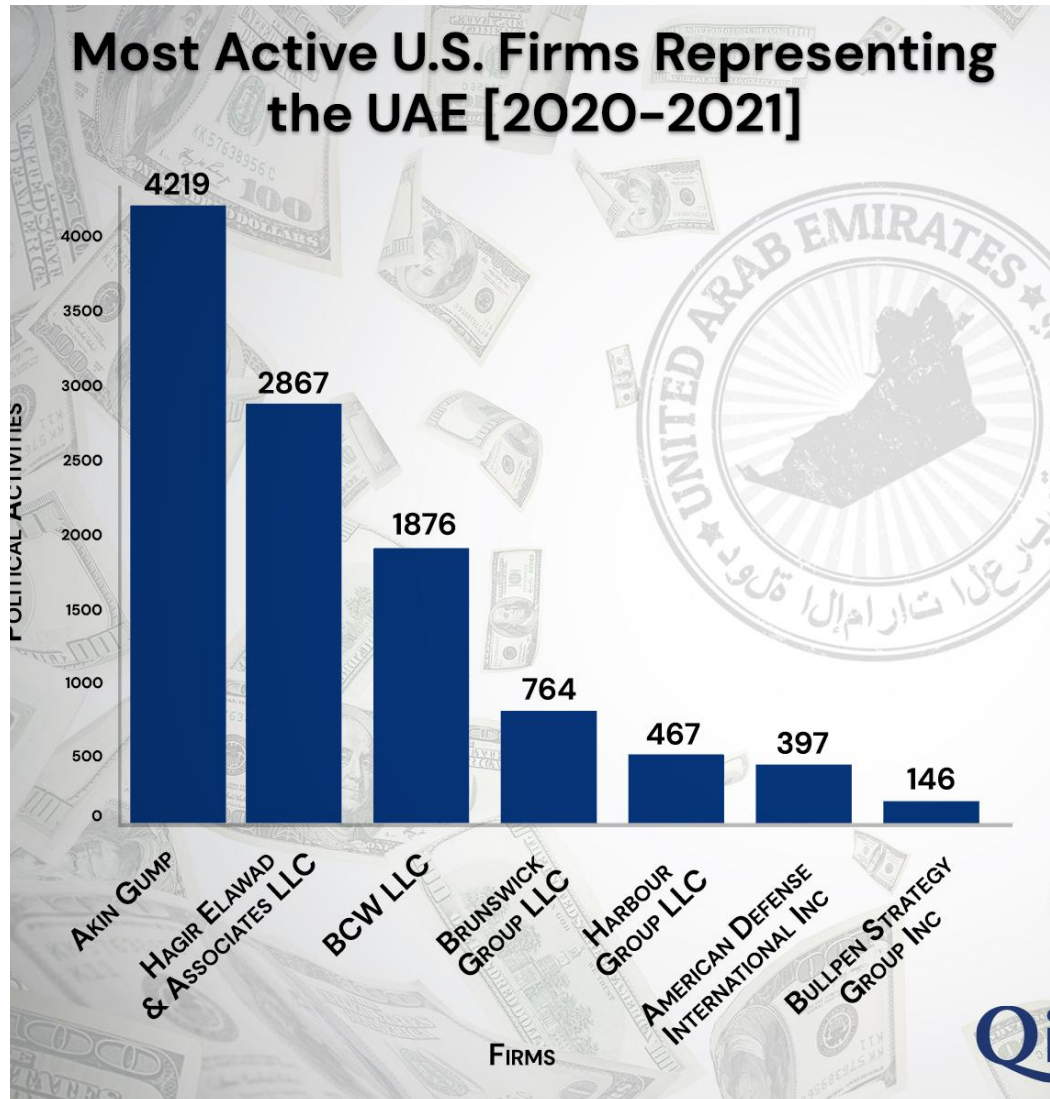
<sup>16</sup> Freeman, Ben. "The Saudi Lobby in 2020." Center for International Policy, May, 2021. [https://3ba8a190-62da-4c98-86d2-893079d87083.usrfiles.com/ugd/3ba8a1\\_a3f4d1858a9d4afb96f019a206573810.pdf](https://3ba8a190-62da-4c98-86d2-893079d87083.usrfiles.com/ugd/3ba8a1_a3f4d1858a9d4afb96f019a206573810.pdf).

<sup>17</sup> Department of Justice." U.S. Government Publishing Company. July 1, 2016 Edition. <https://www.govinfo.gov/content/pkg/CFR-2016-title28-vol1/pdf/CFR-2016-title28-vol1-part5.pdf>.

<sup>18</sup> Glover Park Group, LLC, "Supplemental Statement." Department of Justice, February 28, 2020. <https://efile.fara.gov/docs/5666-Supplemental-Statement-20200228-33.pdf>.



**Table 1: The most active firms representing Emirati clients in the U.S. in 2020 and 2021 (by reported political activities)**



These outreach efforts were overwhelmingly directed at the House (4346), Senate (2905), and media organizations (2889). Though nearly every congressional office was contacted by the Emirati lobby, key committees were the primary targets of lobbyists working for Emirati interests. Specifically, staff on the Senate Foreign Relations Committee and the House Foreign Affairs Committee – which addressed a number of key issues of interest to the UAE, as is discussed below – were contacted more than 200 times by lobbyists working for the UAE. The most contacted individual member was Lee Zeldin (R-N.Y.), a member of the House Foreign Affairs Committee and co-chair of

the House Israel Caucus, who was an outspoken proponent of the UAE–Israel peace agreement via the Abraham Accords.<sup>19</sup> Party leaders and high-ranking members on key committees were also primary targets of the Emirati lobby, with the most targeted members being Senate Majority Leader Chuck Schumer (D-N.Y.), House Majority Leader Steny Hoyer (D-Md.), and the Chairman of the House Armed Services Committee Adam Smith (D-Wash.). In addition to these highly contacted Democratic offices, a number of Republican office holders were contacted more than 50 times, including Lee Zeldin (R–N.Y.), Todd Young (R–Penn), and Ted Cruz (R–Texas). In short, the Emirati lobby’s influence activities were decidedly bipartisan.

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Media outreach by the Emirati lobby was similarly spread far and wide, with FARA registrants reporting contacting more than 500 different media outlets on behalf of their Emirati clients. The lion’s share of these efforts, however, focused on influencing mainstream media outlets like The New York Times (95 contacts), Forbes (61 contacts), and The Wall Street Journal (43 contacts).

Think tanks were also contacted at least 90 times by the Emirati lobby. Notably, the most contacted think tanks — the Middle East Institute, the Atlantic Council, and the

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<sup>19</sup> Nelson, Joshua. “Lee Zeldin on Israel–UAE peace deal: Middle East nations realizing Iran is the threat, not Israel.” Fox News, August 14, 2020. <https://www.foxnews.com/politics/lee-zeldin-israel-uae-peace-deal-iran-aggression>.

Center for Strategic and International Studies – have all received millions of dollars in legal donations from the United Arab Emirates.<sup>20</sup>

## Following the Emirati lobby money

As compensation for this remarkable amount of work on behalf of their Emirati clients, these FARA registered firms reported receiving nearly \$64.5 million. Though more than two dozen firms were working on behalf of Emirati clients, just five firms received the vast majority of this money from the UAE. In order of money received from Emirati clients, the top firms were Akin Gump (\$13.5 million), Brunswick Group (\$12.2 million), The Camstoll Group (\$10.5 million), Teneo Strategy (\$7.2 million), and The Harbour Group (\$6.6 million).<sup>21</sup>

The top recipients of UAE money were also the top donors to U.S. political campaigns. Specifically, in FARA filings Akin Gump alone reported making nearly \$1.1 million in campaign contributions, roughly two-thirds of the \$1.65 million made by all firms working for the Emirati lobby in 2020 and 2021. As discussed below, this does not imply any sort of illegality or that funds from the UAE were used to make these contributions, which would be a violation of the Federal Election Commission’s prohibition on foreign national contributions. Given that clarification, the top recipients of political donations from firms working on behalf of Emirati interests are listed in Table 2.

**Table 2: The top recipients of campaign contributions from FARA registrants working for Emirati interests<sup>22</sup>**

Terry McAuliffe	\$205,500
Chuck Shumer	\$19,300
Steny Hoyer	\$17,150
Liz Cheney	\$16,300

<sup>20</sup> Freeman, Ben. “Foreign Funding of Think Tanks in America.” Center for International Policy, January 2020. [https://static.wixstatic.com/ugd/3ba8a1\\_4f06e99f35d4485b801f8dbfe33b6a3f.pdf](https://static.wixstatic.com/ugd/3ba8a1_4f06e99f35d4485b801f8dbfe33b6a3f.pdf).

<sup>21</sup> This is the total amount of money each of these firms received from Emirati clients as reported in each of these firms’ Supplemental Statements filed in 2020 and 2021.

<sup>22</sup> This is the total amount of money each of these members’ campaigns received from Emirati clients as reported in the FARA Supplemental Statements filed by firms working on behalf of Emirati interests in 2020 and 2021.

Richard Blumenthal	\$14,450
Gregory Meeks	\$14,013
Mark Warner	\$11,350
Kelly Loeffler	\$11,050
Marco Rubio	\$10,900
Chris Coons	\$10,250

As Table 2 shows, the top recipient of contributions from the Emirati lobby was Terry McAuliffe (D–Va.), who received a \$200,000 contribution from Terakeet on August 31, 2021, according to the firm’s FARA filing.<sup>23</sup> McAuliffe is joined on the list by a number of other top Democratic politicians, including Senate Majority Leader Chuck Schumer (D–N.Y.) and House Majority Leader Steny Hoyer (D-Md.). While Table 2 is primarily Democratic politicians, firms working for Emirati clients were decidedly bipartisan in their giving, in fact these firms and their foreign agents donated to more than 450 campaigns from both sides of the aisle.

In many cases these contributions went to the exact same members of Congress these firms were contacting on behalf of their Emirati clients. Akin Gump and its registered foreign agents, alone, reported making campaign contributions to 104 members of Congress whom the firm’s foreign agents had contacted on behalf of the UAE. Altogether, Akin reported donating \$528,461.06 to the campaigns of elected officials the firm’s foreign agents had contacted on behalf of the UAE. In some cases these contacts and contributions were made just days apart. For example, Senator Todd Young had an in–person meeting with Akin Gump on April 15, 2021. A week later, Akin Gump donated \$5,000 to his campaign committee.<sup>24</sup>

<sup>23</sup> Terakeet, LLC. “Supplemental Statement.” Department of Justice, October 30, 2021. <https://efile.fara.gov/docs/6806-Supplemental-Statement-20211030-4.pdf>.

<sup>24</sup> Akin Gump Strauss Hauer & Feld LLP. “Supplemental Statement.” Department of Justice, July 30, 2021. <https://efile.fara.gov/docs/3492-Supplemental-Statement-20210730-36.pdf>.

While some might see these practices as pay-to-play politics, they are not illegal. FARA Supplemental Statements, where this information was obtained, make it perfectly clear that these contributions are not being made on behalf of the UAE or any other foreign client, but that they are “from your own funds and on your own behalf,” which shields these lobbyists from accusations that they are guilty of helping their Emirati clients violate the Federal Election Commission’s prohibition on campaign contributions from foreign nationals. These firms and the lobbyists working for them derive revenue from domestic clients as well, which, along with other income streams, could be used to make these contributions. And, while official resources, including congressional offices, can’t be used to raise campaign funds, no law prohibits a Member of Congress from accepting a campaign contribution from a lobbyist the same day they’ve met with them, even if that lobbyist is working on behalf of a foreign power.

## The issues

This section attempts to document how the extraordinary efforts of the Emirati lobby worked to advance Emirati interests in the United States. Specifically, this section investigates the Emirati lobby’s work related to U.S. arms sales to the UAE, the Abraham Accords, the war in Yemen, and Dubai Expo 2020.

### Arms sales

The UAE enjoys a reputation as a major military power in the Middle East, earning the moniker of “Little Sparta” among the U.S. military. As Yousef Al Otaiba, the UAE’s ambassador to the United States, writes in one filing distributed by Akin Gump to government officials, the UAE is the “only Arab country that has proudly fought alongside the United States in six military coalitions since 1990, from Kosovo to Somalia to the campaign against ISIS.”<sup>25</sup> Many retired American generals have been hired by the UAE in lucrative consulting deals, including former Defense Secretary

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<sup>25</sup> Hagir Elawad. “Informational Material.” Department of Justice, December 8, 2020. <https://efile.fara.gov/docs/6567-Informational-Materials-20201208-11.pdf>.

James Mattis, who originally gave “Little Sparta” its nickname.<sup>26</sup> Some of the military’s top brass registered to represent the Emirati embassy under FARA; these include Todd Harmer, a retired U.S. Air Force colonel who lobbied Congress to approve major arms sales to the UAE.<sup>27</sup> Harmer received a base annual salary of \$180,000 from American Defense International, a lobbyist for the UAE.<sup>28</sup>

A stronger military partnership – which includes further security commitments and arms sales – is arguably the lynchpin of the UAE’s lobbying efforts. It is the issue where the UAE’s registered foreign agents most explicitly attempt to influence the legislative process, according to filing disclosures. But the warm military relationship between the United States and the UAE has not been without critics in Congress.<sup>29</sup> As such, the Emirati lobby often has to play defense rather than offense to prevent amendments limiting arms transfers to the UAE.

For example, filings show that in July 2020 American Defense International made over a dozen contacts about proposed amendments in the NDAA and the State, Foreign Operations, and Related Programs (SFOPs) bill that would limit arms transfers to the UAE.<sup>30</sup> Rep. Tom Malinowski (D–N.J.) had introduced an amendment to SFOPs that said funds from the bill could not be used to “carry out the sale, transfer, or authorization for the transfer to the Government of Saudi Arabia or the Government of the United Arab Emirates” of certain munitions, including anti-tank missiles, rockets, and bombs.<sup>31</sup>

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<sup>26</sup> Chandrasekaran, Rajiv. “In the UAE, the United States has a quiet, potent ally nicknamed ‘Little Sparta.’” *The Washington Post*, November 9, 2014. [https://www.washingtonpost.com/world/national-security/in-the-uae-the-united-states-has-a-quiet-potent-ally-nicknamed-little-sparta/2014/11/08/3fc6a50c-643a-11e4-836c-83bc4f26eb67\\_story.html](https://www.washingtonpost.com/world/national-security/in-the-uae-the-united-states-has-a-quiet-potent-ally-nicknamed-little-sparta/2014/11/08/3fc6a50c-643a-11e4-836c-83bc4f26eb67_story.html).

<sup>27</sup> Todd Harmer. “Short Form Registration Statement.” Department of Justice, February 13, 2020. <https://efile.fara.gov/docs/6567-Short-Form-20200213-12.pdf>.

<sup>28</sup> Whitlock, Craig and Nate Jones. “UAE relied on expertise of retired U.S. troops to beef up its military.” *The Washington Post*, October 18, 2022. <https://www.washingtonpost.com/investigations/interactive/2022/uae-military-us-veterans/>

<sup>29</sup> “Senators Menendez, Paul, Murphy Unveil Joint Resolutions of Disapproval for Proposed Arms Package to UAE.” Senate Foreign Relations Committee, November 18, 2020. <https://www.foreign.senate.gov/press/dem/release/senators-menendez-paul-murphy-unveil-joint-resolutions-of-disapproval-for-proposed-arms-package-to-uae>.

<sup>30</sup> American Defense International, Inc. “Supplemental Statement.” Department of Justice, February 19, 2021. <https://efile.fara.gov/docs/6567-Supplemental-Statement-20210219-5.pdf>.

<sup>31</sup> United States House of Representatives. “Department of State, Foreign Operations, and Related Programs Appropriations Act, 2021; Congressional Record Vol. 166, No. 130.” congress.gov, July 23, 2020. <https://www.congress.gov/116/crec/2020/07/23/CREC-2020-07-23-pt1-PgH3715-4.pdf>.

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Todd Harmer, a retired U.S. Air Force colonel who represented American Defense International, also met with the Senate Armed Services Committee in September of that year to “express concerns with certain restrictions” outlined in the annual intelligence bill. Those restrictions refer to Section 804 of the bill, which required the intelligence community to submit a report to Congress about the UAE’s proliferation of UAVs – including a description of any cooperation between UAE-based entities and entities in Russia and China.<sup>32</sup> It also referred to Section 807, which directed the intelligence community to submit a report to congressional intelligence committees assessing Saudi Arabia, the UAE, and Qatar’s efforts to “influence political processes, policies, policymakers, or public debate in the United States (without regard to the legality of such efforts).”<sup>33</sup>

Having warded off critics in Congress, the \$23 billion package including remotely piloted aircraft, billions of dollars in munitions, and perhaps most crucially, 50 F-35 Joint Strike Fighters was announced on November 10, 2020.<sup>34</sup> The potential sale came shortly after the Abraham Accords, leading some to suggest that the normalization was, at its core, an arms deal.<sup>35</sup>

The same day that the potential sale was announced, the Emirati embassy released an “F-35 White Paper,” a detailed report making the case for why the UAE deserves F-35 fighter jets; “The U.S. is the UAE’s partner of choice – in security, in trade, in outlook.

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<sup>32</sup>American Defense International, Inc. “Supplemental Statement.” Department of Justice, February 19, 2021. <https://efile.fara.gov/docs/6567-Supplemental-Statement-20210219-5.pdf>.

<sup>33</sup> United States House of Representatives. “H.R.7856 - Intelligence Authorization Act for Fiscal Year 2021.” congress.gov, October 30, 2020. <https://www.congress.gov/bill/116th-congress/house-bill/7856/text>.

<sup>34</sup> “Major Arms Sales Monthly Archive: November 2020.” Defense Security Cooperation Agency, November 2020. <https://www.dsca.mil/major-arms-sales/archive-date/202011>.

<sup>35</sup> Hartung, William D. “Don’t let the Abraham Accords become the Arms Sales Accords.” CNN, October 4, 2020. <https://www.cnn.com/2020/10/04/opinions/abraham-accords-hartung/index.html>.

And the US-supplied F-35 is the UAE's next generation fighter of choice." Akin Gump circulated the paper to dozens of Senate and House offices.

But, the massive arms package was, once again, met with some resistance in Congress. Senators Bob Menendez (D-N.J.), Rand Paul (R-Ky.), and Chris Murphy (D-Conn.) introduced four separate Joint Resolutions of Disapproval rejecting the sale, arguing that the Trump administration had circumvented the informal Congressional review process.<sup>36</sup> "The Emiratis are an important security partner, but their recent behavior indicates that these weapons may be used in violation of U.S. and international law," said Senator Murphy.<sup>37</sup>

To push the sale through, the UAE leaned into its lobbying operation. American Defense International and Akin Gump contacted senators dozens of times about the Joint Resolutions of Disapproval in an attempt to sway votes. Ambassador Al Otaiba was involved personally, calling Senators Ted Cruz (R-Texas) and Chris Van Hollen (D-Md.) to discuss the "UAE defense package and the pending resolutions of disapproval."<sup>38</sup> American Defense International also sought to assuage any concerns lawmakers may have had over how this would impact the U.S. relationship with Israel. In late November, they distributed a statement from the Israeli foreign minister about how the F-35 sale wouldn't impact the Abraham Accords.<sup>39</sup>

On November 30, a story broke that threatened to upend the arms package vote: the Pentagon had allegedly discovered the UAE was financing the Libya operations of the Wagner Group, a shadowy Russian mercenary organization.<sup>40</sup> The UAE vehemently

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<sup>36</sup> Chairman's Press. "Senators Menendez, Paul, Murphy Unveil Joint Resolutions of Disapproval for Proposed Arms Package to UAE." Senate Foreign Relations Committee, November 18, 2020. <https://www.foreign.senate.gov/press/dem/release/senators-menendez-paul-murphy-unveil-joint-resolutions-of-disapproval-for-proposed-arms-package-to-uae>.

<sup>37</sup> Chairman's Press. "Senators Menendez, Paul, Murphy Unveil Joint Resolutions of Disapproval for Proposed Arms Package to UAE." Senate Foreign Relations Committee, November 18, 2020. <https://www.foreign.senate.gov/press/dem/release/senators-menendez-paul-murphy-unveil-joint-resolutions-of-disapproval-for-proposed-arms-package-to-uae>.

<sup>38</sup> Akin Gump. "Supplemental Statement." Department of Justice, January 31, 2021. <https://efile.fara.gov/docs/3492-Supplemental-Statement-20210131-35.pdf>.

<sup>39</sup> American Defense International. "Informational Material." Department of Justice, November 30, 2020. <https://efile.fara.gov/docs/6567-Informational-Materials-20201130-9.pdf>.

<sup>40</sup> Mackinnon, Amy and Jack Detsch. "Pentagon Says UAE Possibly Funding Russia's Shadowy Mercenaries in Libya." *Foreign Policy*, November 30, 2020.



denied these allegations, and Ambassador Al Otaiba once again became personally involved, writing a letter to the editor of Foreign Policy, which published the story, explaining, “The UAE is not financing and has never financed the Wagner Group as suggested by a recent Foreign Policy story. And a suggestion is really all it is.” American Defense International then shared the Letter to the Editor with elected officials ahead of the arms sales vote.<sup>41</sup>

At the eleventh hour before the vote, Akin Gump circulated a letter tying all of their points together:<sup>42</sup>

“First, to be clear, the UAE is not financing and has never financed the Wagner Group as suggested by a recent DoD Inspector General report and Foreign Policy story...Second, Yemen is a difficult topic for all...The UAE liberated large parts of the country from Iranian-backed Houthi control in the West and, working with the US, diminished the AQAP threat in the East...Finally, the UAE will not waver in its long-term and staunch alliance with the United States.”

The letter concluded with a plea against the Joint Resolutions of Disapproval: “Again, with a vote expected this week on the JRDs introduced by Senators Menendez, Murphy and Paul, I urge you to send a strong message of support to the US’ closest partners and allies in the region.”<sup>43</sup>

Just before the vote, Akin Gump also embraced a strategy of targeting pivotal Senators, including Senators Mark Kelly (D–Ariz) and Krysten Sinema (D–Ariz). In the week leading up to the vote, Akin Gump requested a call between Al Otaiba and Kelly, shared the F–35 White Paper with Kelly’s office, and emailed Kelly’s staffers. Similarly, Akin Gump made inroads with Sinema’s staff, sharing a paper about the U.S.–UAE

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<https://foreignpolicy.com/2020/11/30/pentagon-trump-russia-libya-uae/>.

<sup>41</sup> American Defense International. “Informational Material.” Department of Justice, December 5, 2020. <https://efile.fara.gov/docs/6567-Informational-Materials-20201205-10.pdf>.

<sup>42</sup> American Defense International. “Informational Material.” Department of Justice, December 8, 2020. <https://efile.fara.gov/docs/6567-Informational-Materials-20201208-11.pdf>.

<sup>43</sup> American Defense International. “Informational Material.” Department of Justice, December 8, 2020. <https://efile.fara.gov/docs/6567-Informational-Materials-20201208-11.pdf>.

Partnership, requesting a call between Al Otaiba and Sinema, and emailing her national defense and military policy advisor.

Ultimately, both Sinema and Kelly voted against blocking the Reaper drone sale. Their votes proved to be decisive in the 50–46 vote on December 9, 2020 that paved the way for the arms sale. The F–35 sale was a closer 49–47 vote, also on December 9, 2020, with Sinema breaking from her party to approve the sale.<sup>44</sup> In short, the Emirati lobby, at the very least, helped to tip the scales in this legislative fight to send some of the most advanced U.S. military equipment to the UAE.

The next hurdle the Emirati lobby sought to overcome was when the Biden administration took office and pledged to review the \$23 billion arms package. The main concern for the Biden administration was cybersecurity, demanding that the UAE not transfer any U.S. military technology to China and that the weapons not be used for interventions in Yemen and Libya.<sup>45</sup>

The day the review was announced, the president of American Defense International, Michael Herson, had a phone call with a State Department official about the Biden administration's review of weapons transfer policy to the UAE.<sup>46</sup> A few days later, Herson had a similar call with Adam Smith (D–Wash.), the Chairman of the House Armed Services Committee.<sup>47</sup> American Defense International also organized in–person meetings about arms transfers with other key members of Congress including Michael McCaul (R–Texas), Mike Rogers (R–Alaska), and Bob Menendez (D–N.J.).

As negotiations stretched on, the Emirati lobby stepped up their media outreach as well. The Harbour Group, for example, representing the Emirati embassy, contacted several

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<sup>44</sup> Ahmed, Akhbar Shahid. "GOP Senators And Democratic Defectors Save Donald Trump's Biggest Arms Deal." *Huffington Post*, December 9, 2020.

[https://www.huffpost.com/entry/trump-uae-senate-weapons-sale\\_n\\_5fd1417dc5b61d81b33ba36c](https://www.huffpost.com/entry/trump-uae-senate-weapons-sale_n_5fd1417dc5b61d81b33ba36c).

<sup>45</sup> Samuels, Ben. "Two Years After Abraham Accords, Why the UAE F-35 Deal Remains Grounded." *Haaretz*, September 13, 2022.

<https://www.haaretz.com/israel-news/security-aviation/2022-09-13/ty-article/.premium/two-years-after-abraham-accords-why-the-uae-f-35-deal-remains-grounded/00000183-3743-d070-abef-f7d755450000?lts=1666601439873>.

<sup>46</sup> American Defense International, Inc. "Supplemental Statement." Department of Justice, February 19, 2021. <https://efile.fara.gov/docs/6567-Supplemental-Statement-20210219-5.pdf>.

<sup>47</sup> American Defense International, Inc. "Supplemental Statement." Department of Justice, February 19, 2021. <https://efile.fara.gov/docs/6567-Supplemental-Statement-20210219-5.pdf>.

reporters at CNN, NPR, Bloomberg, and elsewhere about the deal. The Harbour Group also reported “multiple contacts” – though unspecified dates – with Bilal Saab and Firas Maksad of the Middle East Institute, a think tank funded by the UAE, to discuss the F-35, among other items.<sup>48</sup> Throughout this time, the UAE privately grew frustrated with the negotiations and the terms the Biden administration laid out.<sup>49</sup>

In September 2021, Rep. Ilhan Omar (D-M.N.) introduced an amendment to the national defense bill that would have blocked the sale of F-35s and other weapons to the UAE.<sup>50</sup> Akin Gump sent out several emails to the U.S.–UAE Business Council about Omar’s amendments, which never made it into the defense bill. Then, in late 2021, the sale broke down as the UAE suspended talks, citing “technical requirements, sovereign operations restrictions, and cost/benefit analysis.”<sup>51</sup> Today, the behemoth sale remains frozen.

Even as the \$23 billion arms sale stalled, the Biden administration has showered the UAE with other military hardware. In total, the Biden administration has approved just under \$3.5 billion worth of arms sales to the UAE, more than the U.K. and France combined.<sup>52</sup> This includes Terminal High Altitude Area Defense (THAAD) System Missiles, support for C-17 aircraft, and parts for missiles.<sup>53</sup> This close military

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<sup>48</sup> The Harbour Group. Supplemental Statement. Department of Justice, November 5, 2021. <https://efile.fara.gov/docs/5478-Supplemental-Statement-20211105-37.pdf> ; “Middle East Institute 2021 Contributors.” Middle East Institute.

[https://www.mei.edu/sites/default/files/2022-02/2021%20Contributions\\_Amount%20Disclosure.pdf](https://www.mei.edu/sites/default/files/2022-02/2021%20Contributions_Amount%20Disclosure.pdf).

<sup>49</sup> Samuels, Ben. “Two Years After Abraham Accords, Why the UAE F-35 Deal Remains Grounded.” *Haaretz*, September 13, 2022.

<https://www.haaretz.com/israel-news/security-aviation/2022-09-13/ty-article/.premium/two-years-after-abraham-accords-why-the-uae-f-35-deal-remains-grounded/00000183-3743-d070-abef-f7d755450000?lts=1666601439873>.

<sup>50</sup> MEE Staff. “Anti-war groups urge US Congress to end support for Saudi-led war in Yemen.” *Middle East Eye*, September 21, 2021.

<https://www.middleeasteye.net/news/yemen-us-congress-urged-use-ndaa-end-support-saudi-arabia-war>.

<sup>51</sup> Samuels, Ben. “Two Years After Abraham Accords, Why the UAE F-35 Deal Remains Grounded.” *Haaretz*, September 13, 2022.

<https://www.haaretz.com/israel-news/security-aviation/2022-09-13/ty-article/.premium/two-years-after-abraham-accords-why-the-uae-f-35-deal-remains-grounded/00000183-3743-d070-abef-f7d755450000?lts=1666601439873>.

<sup>52</sup> Hartung, William. “Promoting Stability or Fueling Conflict? The Impact of U.S. Arms Sales on National and Global Security.” The Quincy Institute, October 20, 2022.

<https://quincyinst.org/report/promoting-stability-or-fueling-conflict-the-impact-of-u-s-arms-sales-on-national-and-global-security/>.

<sup>53</sup> Hartung, William. “Appendix: Major U.S. arms sales under the Biden administration, January 2021

partnership has made the UAE the third–largest recipient of U.S. weapons in the last five years, behind only Afghanistan and Saudi Arabia, according to a Quincy Institute report by Bill Hartung.<sup>54</sup>

## Abraham Accords

The Abraham Accords were an initiative initiated during the Trump administration that ultimately led to the normalization of relations between Israel and the UAE, Bahrain, Morocco, and Sudan. Some of these countries leveraged their support for the accords in exchange for various concessions, such as the United States’ recognition of Morocco’s sovereignty over the Western Sahara. The UAE is no different, leveraging the normalization of relations with Israel to push for some of the most advanced U.S. military weaponry.

Unsurprisingly, the Abraham Accords were the subject of a feverish lobbying campaign. In total, over 1,000 political activities reported by the Emirati lobby explicitly mentioned the Abraham Accords. The bulk of this – more than 600 political activities reported in the FARA filings of firms working for the UAE – came after the Abraham Accords were signed and was usually mentioned in tandem with arms sales, indicating the UAE used the signing of the Abraham Accords as a way to secure even more arms from the United States.

This campaign began in earnest on August 13, 2020, the day that American, Israeli, and Emirati leaders spoke and agreed to the normalization of relations between Israel and the UAE.<sup>55</sup> That same day, Emirati lobbyists reported making over a hundred contacts to key senators, representatives, and committees requesting meetings to discuss the Abraham Accords, including with Nancy Pelosi (D–Calif.), Bob Menendez (D–N.J.), and Jack Reed (D–R.I.). When several senators introduced legislation praising the accords,

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to October 2022.” The Quincy Institute, October 20, 2022.

<https://quincyinst.org/wp-content/uploads/2022/10/QUINCY-PAPER-NO.-9-INDEX.pdf>.

<sup>54</sup> Hartung.

<sup>55</sup> U.S. Mission Israel. “Joint Statement of the United States, the State of Israel, and the United Arab Emirates.” U.S. Embassy in Israel, August 13, 2020.

<https://il.usembassy.gov/joint-statement-of-the-united-states-the-state-of-israel-and-the-united-arab-emirates/>.

Akin Gump contacted all but one to “Discuss recent legislation lauding Abraham Accords.”<sup>56</sup>

*The Abraham Accords were the subject of a feverish lobbying campaign. In total, over 1,000 political activities reported by the Emirati lobby explicitly mentioned the Abraham Accords.*

The Emirati lobby then used the accords to justify greater arms sales to “Little Sparta,” as the UAE is nicknamed in U.S. military circles. In a report authored by the Emirati embassy and distributed by the UAE’s foreign agents titled “the UAE and the F-35,” they argued that “with the recent historic normalization accords, security and defense cooperation will be formalized and accelerated.”<sup>57</sup>

The paper calling for arms sales – which was shared with dozens of representatives and senators by Akin Gump – explained the accords were a harbinger of peace: “The signing of the UAE–Israel Accord was a disruptive reminder that Emiratis and Israelis, all the people of the Middle East are tired of conflict.” Yet, the paper goes on to suggest the exact opposite, emphasizing ongoing security threats in the region and implying the need for greater U.S. military support. The accord “was a galvanizing moment for the aggressors and radicals of the region opposed to progress, modernization, tolerance, and change... The most formidable threat is Iran’s proliferation of offensive ballistic missiles, precision rockets, and armed drones,” according to the paper.<sup>58</sup> In short, the argument is that the peace afforded by the Abraham Accords necessitates selling weapons of war.

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<sup>56</sup> Press Release. “Cardin, Graham, Menendez and Young to Introduce Resolution Praising Historic Agreement Between Israel, UAE.” The Office of Senator Ben Cardin, August 20, 2020. <https://www.cardin.senate.gov/press-releases/cardin-graham-menendez-and-young-to-introduce-resolution-praising-historic-agreement-between-israel-uae/>.

<sup>57</sup> Akin Gump. “Informational Material.” Department of Justice, November 11, 2020. <https://efile.fara.gov/docs/3492-Informational-Materials-20201111-72.pdf>.

<sup>58</sup> Akin Gump.

This notion that the Abraham Accords helped to delineate between friends and foes of the United States in the region was a common theme of the Emirati lobby. On December 15, 2020, former congresswoman Ileana Ros-Lehtinen (R–Fla) wrote an article for The Jerusalem Post titled “Abraham Accords reveals the real US allies in the Middle East.”<sup>59</sup> The article, which was distributed by Akin Gump, argued that the “groundbreaking Abraham Accords” exemplify a “new order” of steadfast allyship between the United States and the UAE. Ros–Lehtinen registered as a lobbyist for the UAE with Akin Gump just a month later.<sup>60</sup> In a later FARA filing, Ros–Lehtinen admitted that when she entered Congress she was an outspoken “skeptic” of the UAE, explaining her about–face by declaring that she eventually “fully appreciated the importance of the UAE to U.S. interests in the region.”<sup>61</sup> Ros–Lehtinen’s former colleague, Rep. Lamar Smith (R–T.X.) also joined the team at Akin Gump representing the Emirati embassy to conduct outreach on “export controls and sanctions, trade policies, human rights U.S. foreign and defense policies, etc.”<sup>62</sup>

In early 2021, the Abraham Accords faced its first real test as fighting broke out between Israel and Hamas.<sup>63</sup> The crisis ended with a ceasefire on May 21, though not before leaving more than 200 Palestinians and 11 Israelis dead.<sup>64</sup> As early as 2020, a Department of Homeland Security intel report warned that the accords would inflame tensions between Israel and Palestine rather than bring peace.<sup>65</sup> Sure enough, despite the disproportionate violence towards Palestinians, the UAE chose rapprochement with Israel, even inviting Israel to set up shop in a free trade zone on June 2.<sup>66</sup> That month,

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<sup>59</sup> Akin Gump. “Informational Material.” Department of Justice, January 4, 2021. <https://efile.fara.gov/docs/3492-Informational-Materials-20210104-79.pdf>.

<sup>60</sup> Ros-Lehtinen, Ileana. “Short Form Registration Statement.” Department of Justice, January 21, 2020. <https://efile.fara.gov/docs/3492-Short-Form-20200121-398.pdf>.

<sup>61</sup> Akin Gump. “Informational Material.” Department of Justice, July 8, 2020. <https://efile.fara.gov/docs/3492-Informational-Materials-20200708-59.pdf>.

<sup>62</sup> Smith, Lamar. “Short Form Registration Statement.” The Department of Justice, March 31, 2022. <https://efile.fara.gov/docs/3492-Short-Form-20220331-508.pdf>.

<sup>63</sup> Vohra, Anchal. “The Abraham Accords Passed Their First Big Test.” Foreign Policy, June 8, 2021. <https://foreignpolicy.com/2021/06/08/the-abraham-accords-passed-their-first-big-test/>.

<sup>64</sup> Knell, Yolande and Elsa Maishman. “Israel-Gaza: Death toll rises as Israel kills second top militant.” BBC, August 7, 2021. <https://www.bbc.com/news/world-middle-east-62445951>.

<sup>65</sup> Klippenstein, Ken. “Intel report warned: Abraham Accords would fuel violence.” The Intercept, June 6, 2022. <https://theintercept.com/2022/06/22/abraham-accords-israel-saudi-arabia-biden/>.

<sup>66</sup> Vohra, Anchal. “The Abraham Accords Passed Their First Big Test.” Foreign Policy, June 8, 2021. <https://foreignpolicy.com/2021/06/08/the-abraham-accords-passed-their-first-big-test/>.

Akin Gump ramped up lobbying operations surrounding the Abraham Accords, organizing several in-person meetings and phone calls with staff members of elected officials to discuss normalization with Israel.<sup>67</sup>

Around the first anniversary of the Abraham Accords, Akin Gump reported multiple Zoom calls with the executive director of the Abraham Accords Institute for Peace, an organization founded by Jared Kushner, President Trump's son-in-law.<sup>68</sup> Both Akin Gump and Harbour Group contacted the organization, whose mission is the "implementation and expansion of the Abraham Accords," to coordinate an event on the first anniversary of the initial signing.<sup>69</sup> Ambassador Al Otaiba spoke at the Abraham Accords Institute for Peace event, as did Kushner and the ambassadors of Bahrain and Israel.<sup>70</sup>

In addition to highlighting the agreement itself, the UAE's agents directly promoted the heightened U.S. military entanglements that resulted from the Abraham Accords. In November 2021, for example, an email was circulated to congressional staff celebrating the first joint naval exercise in the Red Sea between the United States, the UAE, Bahrain, and Israel. The email – which former congresswoman Ros-Lehtinen is copied on – explains that the exercise "comes as Iranian aggression in the region continues to percolate."<sup>71</sup>

In January 2022, eight members of Congress<sup>72</sup> founded the Abraham Accords Caucus, a self-described "cheerleading squad" for the Accords.<sup>73</sup> The caucus' first legislative initiative was to get a bill that would encourage the United States to pursue a joint

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<sup>67</sup> Akin Gump. "Supplemental Statement." Department of Justice, July 30, 2021. <https://efile.fara.gov/docs/3492-Supplemental-Statement-20210730-36.pdf>.

<sup>68</sup> Ravid, Barak. "Scoop: Jared Kushner founds "Abraham Accords Institute." Axios, May 5, 2021. <https://www.axios.com/2021/05/05/jared-kushner-abraham-accords-institute>.

<sup>69</sup> "About the Abraham Accords Peace Institute." Abraham Accords Peace Institute. <https://www.aapeaceinstitute.org/institute>.

<sup>70</sup> Deutch, Gabby. "Ambassadors to mark first anniversary of Abraham Accords." *Jewish Insider*, September 10, 2021. <https://jewishinsider.com/2021/09/kushner-backed-group-to-mark-first-anniversary-of-abraham-accords/>.

<sup>71</sup> Akin Gump. "Informational Material." Department of Justice, November 19, 2021. <https://efile.fara.gov/docs/3492-Informational-Materials-20211119-101.pdf>.

<sup>72</sup> The members were: James Lankford (R-OK), Jacky Rosen (D-NV), Joni Ernst (R-IA), Cory Booker (D-NJ), Cathy McMorris Rodgers (R-WA), David Trone (D-MD), Ann Wagner (R-MO) and Brad Schneider (D-IL).

<sup>73</sup> Rod, Marc. "Congress launches bipartisan Abraham Accords Caucus." *Jewish Insider*, January 10, 2022. <https://jewishinsider.com/2022/01/congress-abraham-accords-caucus-launch/>.

missile–defense architecture into the annual defense bill.<sup>74</sup> In July 2022, American Defense International lobbied the House Armed Services Committee in favor of the bill, known as the DEFEND act, including an in–person discussion with the House Armed Services Committee Chairman Adam Smith.<sup>75</sup> In total, members of the Abraham Accords Caucus and their staff were contacted 180 times by Emirati lobbyists over the course of this analysis.

## War in Yemen

A 2021 Quincy Institute study found that the UAE is one of the most interventionist powers in the Middle East.<sup>76</sup> In many of these interventions the United States fought alongside the UAE – such as NATO–led operations in Afghanistan and Libya. However, as public appetite for interventionism decreased in the United States, this became a public relations issue for the UAE, particularly surrounding their military operations in the devastating Yemen war.

Since 2015 the UAE has played a significant role, second only to Saudi Arabia, in the intervention in Yemen, contributing some 10,000 ground troops.<sup>77</sup> Even after withdrawing most of its troops in 2020, the UAE continued to back several non–state armed groups through direct training, capacity building, logistical support, and paying their salaries.<sup>78</sup> The UAE maintains control over several key territories in Yemen such as Socotra, a UNESCO world heritage site.<sup>79</sup> Throughout, the United States has supported

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<sup>74</sup> Ernst, Joni. “The DEFEND act of 2022.” The United States Senate.

<https://www.lankford.senate.gov/imo/media/doc/DEFEND%20Act%20Bill%20Text1.pdf>.

<sup>75</sup> American Defense International. “Supplemental Statement.” Department of Justice, August 22, 2022.

<https://efile.fara.gov/docs/6567-Supplemental-Statement-20220822-10.pdf>.

<sup>76</sup> Petti, Matthew and Trita Parsi. “No Clean Hands: The Interventions of Middle Eastern Powers, 2010-2020.” Quincy Institute, July 19, 2021.

<https://quincyinst.org/report/no-clean-hands-the-interventions-of-middle-eastern-powers/>.

<sup>77</sup> Aya Batrawy and Sam Magdy. “AP Explains: How Emirates troop drawdown impacts Yemen’s war.” Associated Press, July 25, 2019.

<https://apnews.com/article/middle-east-yemen-ap-top-news-persian-gulf-tensions-international-news-52fdf-dd37cfd4d698c56878378ced692>

<sup>78</sup> Jalal, Ibrahim. “The UAE may have withdrawn from Yemen, but its influence remains strong.” The Middle East Institute, February 25, 2020.

<https://www.mei.edu/publications/uae-may-have-withdrawn-yemen-its-influence-remains-strong>.

<sup>79</sup> Sheline, Annelle. “The Yemen War in Numbers: Saudi Escalation and U.S. Complicity.” Quincy Institute, March 21, 2022.

<https://quincyinst.org/report/the-yemen-war-in-numbers-saudi-escalation-and-u-s-complicity/>.



these operations implicitly, providing arms sale after arms sale to Saudi Arabia and the UAE.<sup>80</sup>

*Since 2015 the UAE has played a significant role, second only to Saudi Arabia, in the intervention in Yemen, contributing some ten thousand ground troops.*

Accordingly, Yemen is a key focus of the Emirati lobby. Specifically, Yemen is mentioned over a hundred times in political contacts by firms representing the UAE, often in order to position the UAE as a humanitarian actor in Yemen, despite evidence that UAE backed belligerents in the conflict have committed torture and even given U.S. arms to al-Qaeda affiliates there.<sup>81</sup> “Since April 2015 until February 2019, the UAE has provided more than \$5.2 billion in relief to the people of Yemen,” reads one memo sent by UAE Strategies on behalf of the UAE Embassy.<sup>82</sup> Filings show that after meetings with members of Congress, the firm Hagir Elawad – representing the Emirati Embassy – would frequently send follow-up emails to their offices with an attachment titled “UAE Yemen Humanitarian Info Sheet.”<sup>83</sup> In late 2020, with the \$23 billion arms package on the line, Akin Gump addressed concerns over the war in Yemen in a letter by saying the UAE “facilitated the distribution of humanitarian aid and prompted the Houthis to enter a political dialogue.”<sup>84</sup>

A central ambition of UAE’s influence operations centers around the terrorist designation of the Houthi’s in Yemen. The Houthi movement – formally known as Ansar

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<sup>80</sup> Sheline. “The Yemen War in Numbers: Saudi Escalation and U.S. Complicity.”

<sup>81</sup> Speri, Alice. “She helped expose secret UAE-run prisons in Yemen – and paid a steep price.” The Intercept, December 31, 2021. <https://theintercept.com/2021/12/31/uae-yemen-prisons-disappeared/>. and Elbagir, Nima and Salma Abdelaziz, Mohamed Abo El Gheit and Laura Smith-Spark. “Sold to an ally, lost to an enemy.” CNN, February 2019. <https://www.cnn.com/interactive/2019/02/middleeast/yemen-lost-us-arms/>.

<sup>82</sup> UAE Strategies. “Informational Material.” Department of Justice, March 6, 2019. <https://efile.fara.gov/docs/6455-Informational-Materials-20190306-39.pdf>.

<sup>83</sup> UAE Strategies. “Informational Materials.” Department of Justice, August 13, 2019. <https://efile.fara.gov/docs/6455-Informational-Materials-20190813-82.pdf>.

<sup>84</sup> American Defense International. “Informational Material.” Department of Justice, <https://efile.fara.gov/docs/6567-Informational-Materials-20201208-11.pdf>.

Allah — has been fighting Yemen’s government since 2004, and is accused of being backed by Iran.<sup>85</sup> In one of the Trump administration’s last moves, it designated the Houthi movement a Foreign Terrorist Organization (FTO), making humanitarian aid efforts and hope for a ceasefire far more difficult. The move was condemned by 22 aid organizations working in Yemen, who argued that “any disruption to lifesaving operations and commercial imports of food, fuel, medicine and other essential goods will put millions of lives at risk.”<sup>86</sup> The designation meant that formal channels for remittances, a lifeline that accounts for 20 percent of the country’s GDP, would come to a grinding halt.<sup>87</sup>

When the Biden administration entered office, it revoked the terrorist designation of the Houthis. The Emirati lobby immediately sought to reverse the decision following a Houthi-coordinated attack in Abu Dhabi that killed three civilians.<sup>88</sup> American Defense International circulated an email to members of Congress urging them to sign onto a letter spearheaded by Rep. Seth Moulton (D-Mass.) asking the Biden administration to re-designate the Houthi movement a Foreign Terrorist Organization. “Rep Moulton is sending the attached letter to the Biden administration urging the re-designation of the Houthis as a Foreign Terrorist Organization (FTO). I would appreciate if you would sign on to this letter. The deadline is COB Thursday, February 3.”<sup>89</sup> In total, American Defense International made 32 contacts — including in-person discussions, phone calls, texts, and emails — with members of Congress to drum up support for the letter. Simultaneously, American Defense International sought to set up a dinner between

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<sup>85</sup> Glenn, Cameron. “Who are Yemen’s Houthis?” The Wilson Center, July 7, 2022. <https://www.wilsoncenter.org/article/who-are-yemens-houthis>.

<sup>86</sup> News and Press Release. “Aid agencies make unprecedented and united call for Biden administration to revoke Ansar Allah terrorist designation.” Relief Web, January 24, 2021. <https://reliefweb.int/report/yemen/aid-agencies-make-unprecedented-and-united-call-biden-administration-revoke-ansar-allah>.

<sup>87</sup> Relief Web.

<sup>88</sup> Mallo, Charbel and Celine Alkhaldi, Sarah Sirgany and Kareem Khadder “Saudi led-coalition launches airstrikes on Yemeni capital after deadly Houthi drone strike in Abu Dhabi.” CNN, January 17, 2022. <https://edition.cnn.com/2022/01/17/middleeast/uae-abu-dhabi-explosion-drone-houthi-intl/index.html>.

<sup>89</sup> American Defense International. “Informational Material.” Department of Justice, February 2, 2022. <https://efile.fara.gov/docs/6567-Informational-Materials-20220202-18.pdf>.

Ambassador Al Otaiba and Adam Smith, Chairman of the House Armed Services Committee.<sup>90</sup>

By the time the letter was sent, it had 17 signatories.<sup>91</sup> “I urge you to re-designate the Houthis as a Foreign Terrorist Organization,” the letter read. “I understand that removing the designation was meant to help the dire humanitarian situation in Yemen, but it has done little outside of embolden the Houthis to escalate their attacks and block reconciliation efforts in the country.”<sup>92</sup> Several of the signatories had been contacted by American Defense International to discuss the letter, including an in-person discussion with Moulton and a phone call with Rep. Donald Norcross (D-N.J.).<sup>93</sup>

Akin Gump, representing the Emirati Embassy, then circulated a detailed report with a similar request. The report included a section called “Congress agrees: The Houthis are Terrorists” with excerpts from members of Congress that supposedly were unified in wanting the Biden administration to reverse its decision.<sup>94</sup> The only catch was that many of these congressmen had not actually stated support for a redesignation of the Houthis as a Foreign Terrorist Organization. The report, for example, included a tweet from Gregory Meeks, chair of the House Foreign Affairs Committee, even though Meeks came out in support of Biden’s decision.<sup>95</sup> Senator Chris Coons (D-N.J.) was quoted in the report too, even though Coons had condemned the Trump administration’s designation, saying it “undermines U.S. interests and values in Yemen and the Gulf

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<sup>90</sup>American Defense International. “Supplemental Statement.” Department of Justice, August 22, 2022. <https://efile.fara.gov/docs/6567-Supplemental-Statement-20220822-10.pdf>.

<sup>91</sup> Moulton, Seth. “Letter to President Biden.” *Jewish Insider*, February 9, 2022. [https://jewishinsider.com/wp-content/uploads/2022/02/20220209\\_Letter-to-Biden-irt-Houthi-Designation-With-Watermark.pdf](https://jewishinsider.com/wp-content/uploads/2022/02/20220209_Letter-to-Biden-irt-Houthi-Designation-With-Watermark.pdf).

<sup>92</sup> American Defense International. “Informational Material.” Department of Justice, February 2, 2022. <https://efile.fara.gov/docs/6567-Informational-Materials-20220202-18.pdf>.

<sup>93</sup> American Defense International. “Supplemental Statement.” Department of Justice, August 22, 2022. <https://efile.fara.gov/docs/6567-Supplemental-Statement-20220822-10.pdf>.

<sup>94</sup> American Defense International. “Informational Material.” Department of Justice, February 7, 2022. <https://efile.fara.gov/docs/6567-Informational-Materials-20220207-20.pdf>.

<sup>95</sup> Meeks, Gregory. “Meeks Statement on Reversal of Houthi Terrorist Designation.” House Foreign Affairs Committee, February 6, 2021. <https://foreignaffairs.house.gov/2021/2/meeks-statement-on-reversal-of-houthi-terrorist-designation>.

region.”<sup>96</sup> Nevertheless, Coons, Meeks, and others were included in the report, misleadingly implying that they supported the Emirati embassy’s position.<sup>97</sup>

These efforts, as deceptive as they may be, appear to have fallen flat as the Biden administration has yet to redesignate the Houthi movement a FTO.

## Expo 2020 Dubai

Despite considerable focus by the Emirati lobby on hard security concerns like arms sales and Yemen, the UAE’s agents also spent considerable energy promoting a positive image of the Gulf state, including highlighting economic, cultural, and scientific achievements. In press releases circulated to government officials and media outlets, firms representing the Emirati government frequently discuss art exhibitions, space exploration, children’s museums, and other successes, which boost the UAE’s image in the United States. The Louvre Abu Dhabi – which the UAE bought the licensing rights to for \$525 million – features prominently among these informational materials.<sup>98</sup> Some are more memorable than others: “Abu Dhabi Claims A Cool Guinness World Records Title!” reads one press release touting a “record-breaking event” for having the most varieties of ice cream on display.<sup>99</sup>

The crown jewel in this reputation laundering campaign was Expo 2020 Dubai. The World Expo, which was pushed to 2021 due to COVID–19, is mentioned nearly 900 times in political contacts by firms representing the UAE.

Their lobbyists worked diligently to drum up State Department funding for a U.S. pavilion at the World Expo, which was no small feat given that, for 25 years, U.S. pavilions at

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<sup>96</sup> Coons, Chris. “Yesterday’s decision by Secretary Pompeo to designate Yemen’s Houthi movement as a foreign terrorist organization undermines U.S. interests and values in Yemen and the Gulf region.” Twitter, January 11, 2021. <https://twitter.com/chriscoons/status/1348820750992613378>.

<sup>97</sup> American Defense International. “Informational Material.” Department of Justice, February 7, 2022. <https://efile.fara.gov/docs/6567-Informational-Materials-20220207-20.pdf>.

<sup>98</sup> Brunswick Group. “Informational Material.” Department of Justice, September 9, 2021. <https://efile.fara.gov/docs/6826-Informational-Materials-20210909-31.pdf>; Taylor, Alan. “The Opening of the Louvre Abu Dhabi.” *The Atlantic*, November 8, 2017. <https://www.theatlantic.com/photo/2017/11/the-opening-of-the-louvre-abu-dhabi/545333/>.

<sup>99</sup> Action PR Group. “Informational Material.” Department of Justice, March 29, 2022. <https://efile.fara.gov/docs/6227-Informational-Materials-20220329-57.pdf>.

world expos have relied on private funding rather than federal funds.<sup>100</sup> FARA filings show that Sanitas International, a firm hired by Expo 2020 Dubai, met with the chief of staff to Rep. Dean Phillips (D–M.N.) in October 2018 to discuss “H.R. 4842.”<sup>101</sup> HR 4842, otherwise known as the EXPO Act of 2019, was formally introduced a year later by Representative Phillips. The legislation was simple: it would authorize the State Department to “provide funds for a United States pavilion at Expo 2020 Dubai.”<sup>102</sup>

The legislation passed through the House a week later, moving on to the Senate where the Emirati lobby worked to connect UAE officials with key senators. Specifically, in the span of three days in November of 2019, the UAE foreign minister held five separate in–person meetings with U.S. senators to discuss the World Expo – some of which Ambassador Al Otaiba attended as well. “As you know, time has essentially run out to build the actual building and while the UAE has moved forward with building for the US pavilion, we are doing it in hopes that the funding will come through,” one email sent by UAE Strategies warned.<sup>103</sup> Despite the UAE’s best efforts, the EXPO Act of 2019 never passed.<sup>104</sup>

Stonewalled by Congress, the Emirati government took the matter into their own hands by agreeing to foot the bill for the U.S. pavilion at the expo. In a statement, the State Department said that its participation at the World’s Fair was made possible by “the generosity of the Emirati government.”<sup>105</sup>

On May 26, Akin Gump sent out a newsletter to hundreds of elected officials’ offices promoting the World Expo. The newsletter lamented the COVID–19 pandemic which had

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<sup>100</sup> Bernstein, Fred A. “Is America Poised for Another World’s Fair Embarrassment?” *Architect Magazine*, January 28, 2020.  
[https://www.architectmagazine.com/design/is-america-poised-for-another-worlds-fair-embarrassment\\_o](https://www.architectmagazine.com/design/is-america-poised-for-another-worlds-fair-embarrassment_o).

<sup>101</sup> Phillips, Dean. “Expo Act of 2019.” congress.gov, October 23, 2019.  
<https://www.congress.gov/bill/116th-congress/house-bill/4842?r=1&s=1>.

<sup>102</sup> Phillips.

<sup>103</sup> UAE Strategies. “Informational Material.” Department of Justice, November 21, 2020.  
<https://efile.fara.gov/docs/6455-Informational-Materials-20201121-151.pdf>.

<sup>104</sup> Phillips, Dean. “Expo Act of 2019.” congress.gov, October 23, 2019.  
<https://www.congress.gov/bill/116th-congress/house-bill/4842?r=1&s=1>.

<sup>105</sup> Batrawy, Aya. “US says its pavilion at Expo 2020 in Dubai sponsored by UAE.” Associated Press, January 16, 2020.  
<https://apnews.com/article/2b9e5ae4cbaca29b85f1bd8ab8b156e5>.

pushed the start date back to 2021, but took the chance to praise the UAE’s domestic and foreign policies; “These efforts are consistent with our country’s founding principles of humanitarian solidarity. We take these steps at home because we are a responsible steward. We take them abroad because we are a responsible friend and a committed international actor.”<sup>106</sup>

With 192 participating countries—including the U.S.—the Expo itself went off without a hitch.<sup>107</sup> The event did, however, draw criticism from human rights groups for whitewashing abuses. A 2022 Freedom House report, for example, detailed how foreign workers are often exploited and subjected to harsh working conditions — even having their passports taken by the government.<sup>108</sup>

## Key findings

This brief has sought to provide an overview of the Emirati lobby’s influence efforts in America. Based on an exhaustive analysis of all Foreign Agents Registration Act (FARA) documents filed by organizations registered to work on behalf of UAE clients in 2020 and 2021, this brief offers a number of key findings, including:

- 25 organizations were registered under FARA to work on behalf of Emirati clients in 2020 and 2021.
- Those organizations reported making 10,765 contacts on behalf of their Emirati clients — a high number relative to other similar lobbies such as Saudi Arabia.
- Emirati clients paid over \$64 million to firms representing them.
- These firms and their registered foreign agents reported making over \$1.65 million in political contributions.

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<sup>106</sup>Akin Gump. “Informational Material.” Department of Justice, May 28, 2020. <https://efile.fara.gov/docs/3492-Informational-Materials-20200528-55.pdf>.

<sup>107</sup> “Understanding Expo Participants.” Expo 2020 Dubai UAE. <https://www.expo2020dubai.com/en/understanding-expo/participants>.

<sup>108</sup> “Freedom in the World 2022: United Arab Emirates.” Freedom House, 2022. <https://freedomhouse.org/country/united-arab-emirates/freedom-world/2022>.

- More than half a million dollars of this went to members of Congress these firms contacted on behalf of their Emirati clients.

This brief also aspired to provide a deeper understanding of the Emirati lobby's efforts to influence several key U.S. foreign policy decisions that have arguably led to a more militarized U.S. foreign policy in the Middle East. Specifically, the Emirati lobby played a role in advancing the Abraham Accords and using them as justification for further U.S. arms sales and military entanglements with the UAE. The Emirati lobby was also intimately involved in a concerted effort to get the U.S. to sell the UAE \$23 billion worth of some of the most advanced weapons in the U.S. military's arsenal. And, the Emirati lobby continues to advance a narrative that the UAE is a force for good in Yemen, despite its myriad transgressions in the devastating conflict there.

*If the UAE and its proxies in the Emirati lobby are successful in securing a formal security pact with the Biden administration, members of the U.S. military will be asked to fight, and possibly to die, for the UAE.*

Today, the Emirati lobby is thriving. As of this writing in November 2022, there are eighteen FARA registrants working for Emirati clients, including all of the top firms mentioned in this analysis. And, they have been continuing to help the UAE push for greater U.S. military entanglements in the Middle East. In fact, in the spring of 2022 the UAE and Saudi Arabia asked for a formal security treaty with the United States.<sup>109</sup> And this summer the Biden administration reportedly agreed to a security pact with the UAE that would effectively be “a pledge for Americans to fight and die for the kingdom,” according to one analyst.<sup>110</sup>

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<sup>109</sup> Westall, Sylvia and Ben Bartenstein. “Gulf Oil Powers Seek U.S. Security Treaty After Yemen Strikes.” *Bloomberg*, March 30, 2022. <https://www.bloomberg.com/news/articles/2022-03-30/gulf-oil-powers-seek-u-s-security-treaty-after-yemen-strikes?leadSource=uverify%20wall>.

<sup>110</sup> Petti, Matthew. “Die for Dubai? Senators in dark about reported UAE security pact.” *Responsible Statecraft*, June 6, 2022. <https://responsiblestatecraft.org/2022/06/06/die-for-dubai-biden-floating-guaranteed-military-protection-to-the-uae/>.

Though this might serve Emirati interests, the value of these foreign entanglements for the United States is, at the very least, questionable. While the lobbying firms legally making millions of dollars from their Emirati clients are certainly cashing in on this arrangement, American taxpayers are footing the bill for the militarized U.S. foreign policy in the Middle East pushed by the Emirati lobby, including paying for the more than 30,000 U.S. military personnel stationed in the Middle East.<sup>111</sup> And, ultimately, if the UAE and its proxies in the Emirati lobby are successful in securing a formal security pact with the Biden administration, members of the U.S. military will be asked to fight, and possibly to die, for the UAE. It is for this reason that more analysis of the Emirati lobby is needed, to better gauge how this expansive influence operation is putting Emirati interests before U.S. interests, and could ultimately be working towards a security arrangement that would add to costs for the United States and would put the lives of American troops at risk.

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<sup>111</sup> O'Connor, Tom. "Biden Seeks to End 'Forever Wars,' But Still Has Over 30,000 Troops in Middle East One Year On." *Newsweek*, January 20, 2022.

<https://www.newsweek.com/biden-seeks-end-forever-wars-still-has-over-30000-troops-middle-east-one-year-1668815>.

It's worth noting that the Department of Defense officially reports just over 5,000 military personnel stationed in the Middle East, though this number does not include those stationed there temporarily or in classified or contingency operations: "Military and Civilian Personnel by Service/Agency by State/Country (Updated Quarterly)." Defense Manpower Data Center, June 2022.

[https://dwp.dmdc.osd.mil/dwp/api/download?fileName=DMDC\\_Website\\_Location\\_Report\\_2206.xlsx&groupName=milRegionCountry](https://dwp.dmdc.osd.mil/dwp/api/download?fileName=DMDC_Website_Location_Report_2206.xlsx&groupName=milRegionCountry).



## About the Author

**Ben Freeman** is a Research Fellow at the Quincy Institute for Responsible Statecraft. His work focuses on how foreign governments seek to influence American government and politics. This work builds upon his book, *The Foreign Policy Auction*, which was the first book to systematically analyze the foreign influence industry in the U.S. Previously, he was Director of the Foreign Influence Transparency Initiative at the Center for International Policy. His work has appeared in numerous media outlets, including the *New York Times*, *Politico*, and *CNN*, and he has testified before the Senate Armed Services Committee.

## About the Quincy Institute

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CONTACT: Jessica Rosenblum  
Director of Communications  
Email: [rosenblum@quincyinst.org](mailto:rosenblum@quincyinst.org)  
Tel: 202 800 4662