



*A frontline worker walks in a hazmat suit. Source: Mario Hagen via Pixabay*

## INTRODUCTION

The COVID-19 pandemic has had far-reaching implications for nearly every aspect of society and policy. As the National Intelligence Council explained, the pandemic “marks the most significant, singular global disruption since World War II, with health, economic, political, and security implications that will ripple for years to come.”<sup>1</sup> These effects have been particularly significant for developing and emerging states and have served to re-emphasize existing global inequalities.

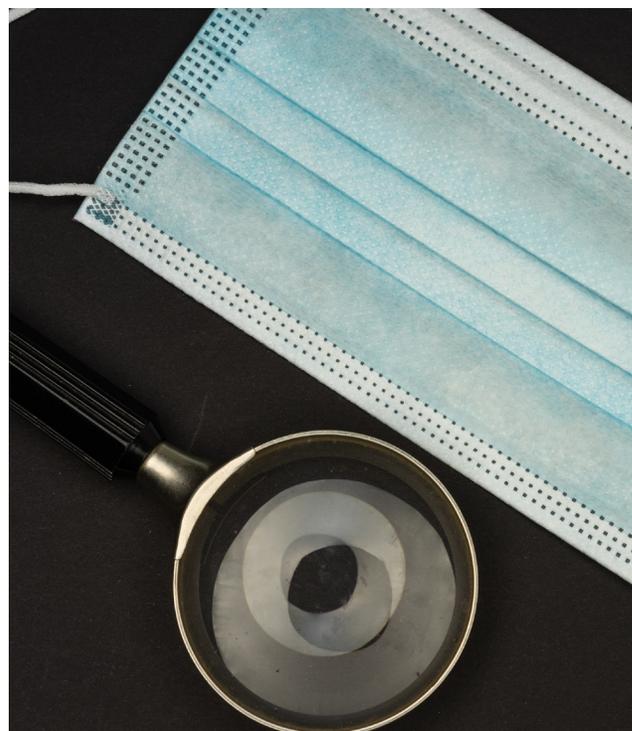
As the pandemic has continued, it has become increasingly apparent that its effects have extended beyond public health to also permeate into the formulation of foreign and public policy. The pandemic has not just had an impact on the substantive discourse in these domains, but also on the processes that underlie their formation. One particular way this has manifested relates to lobbying and foreign influence efforts on issues around the pandemic. Lobbying and influence in the United States can have real and serious consequences for pandemic-related assistance and response in other countries — particularly poorer and developing ones. Studies have shown that lobbying can have a real impact on where — and how — valuable aid and critical supplies are distributed. It is probably fair to say that influence and lobbying, in this instance, can be a matter of life and death.<sup>2</sup>

<sup>1</sup> “Global Trends 2040 A More Contested World,” National Intelligence Council, March 2021, [https://www.dni.gov/files/ODNI/documents/assessments/GlobalTrends\\_2040.pdf](https://www.dni.gov/files/ODNI/documents/assessments/GlobalTrends_2040.pdf).

<sup>2</sup> “Can Poor Countries Lobby for More US Bilateral Aid?” *World Development* 44 (4): 77–87. Licht Amanda A. 2010. “Coming into Money:

The first step to understanding these linkages and working towards more equitable distribution of aid and supplies is to study the phenomenon. Only discourse and study around the topic can lay the foundations for ensuring that the most vociferous lobbying is not conflated with the most critical needs.

Towards this objective, this brief aims to add to the discourse by, for the first time, studying how foreign influence and lobbying activities have interplayed with the COVID-19 pandemic. In particular, this brief aims to conduct a preliminary survey of how the scale of these activities have been affected by the pandemic and how substantive issues around the pandemic have become the subject, object, or channel of foreign influence activities. By doing so, this brief aims to throw light on how the pandemic has interplayed with important themes around public health, global inequality, as well as the practice of lobbying and influence bartering. It aims to serve as a foundation for future research around these themes.



*Mask with magnifying glass. Source: Markus Winkler via Unsplash*

In order to conduct this survey, the Foreign Influence Transparency Initiative (FITI) team extracted a sample of all filings made under the Foreign Agents Registration Act (FARA) which contained selectors relating to the pandemic including “coronavirus,” “COVID,” “pandemic,” and “vaccine” as of March 31, 2021.<sup>3</sup> From these searches, 570, 1078, 951 and 360 hits were received, respectively. We narrowed this dataset to filings which disclosed substantive details about a lobbying/influence relationship.<sup>4</sup> This left a total of approximately 140 filings of various types which are described below. The data from these filings was analyzed to generate observations around the ways in which foreign influence and lobbying activities have been impacted or, alternatively, reflected, the COVID-19 pandemic.

## COVID AS THE SUBJECT AND OBJECT OF FOREIGN INFLUENCE

We focused our study on the interplay between COVID-19 and foreign influence/lobbying activities at a substantive level. Based on the dataset of filings described above, we

The Impact of Foreign Aid on Leader Survival.” *Journal of Conflict Resolution* 54 (1): 58–87.

<sup>3</sup> These searches were conducted using the DOJ’s full-text search engine available at <https://efile.fara.gov/ords/f?p=1235:10>

<sup>4</sup> We excluded other types of filings such as ‘informational materials’ — which are copies of materials developed and distributed by foreign agents on behalf of their principals e.g. fact sheets, news articles, or other advocacy material.

narrowed our survey to focus on two sets of filings: (i) Exhibit A/B filings — which form part of filings made by new registrants under FARA; and (ii) Supplemental statements — which are periodic filings made at six-month intervals by registered foreign agents.<sup>5</sup> A survey of both types of filings revealed an interesting array of influence and lobbying activities relating to the COVID-19 pandemic and related concerns. The following section presents a non-

exhaustive sample of the categories these activities formed part of.

### Impact On Influence Activities

Several supplemental filings disclosed that the pandemic has had a negative impact on foreign influence and lobbying activities in general. A number of registered agents disclosed that contracts had been terminated, that their agent activities had been suspended, or that no disbursements were made on account of the COVID-19 pandemic. For instance, one tourism-sector agent disclosed that it had conducted



View of medical worker through door. Source: SJ Objio via Unsplash

“reduced activity due to COVID-19 pandemic,”<sup>6</sup> while another stated that the pandemic “drastically changed [his] activities and services for the KBE Local Government Council. [He] did [not] travel, or have in-person contacts with anyone representing the U.S. Government during this time.”<sup>7</sup> Other agents disclosed how COVID-19 had led to suspensions of expenditures/disbursements,<sup>8</sup> work-related travel,<sup>9</sup> and delayed contract renewals.<sup>10</sup>

The pandemic has also had a notable transformative impact on the channel or medium of these activities. Several registered agents disclosed a shift to virtual meetings during

5 These filings were chosen as they provide different areas of emphasis. Exhibit A/B filings provide detailed insight into new registrations — and their purposes — thereby providing an overview of how the pandemic stimulated the formation of new influence relationships. In contrast, supplemental statements provide a report of the activities undertaken in the six months preceding the statement — providing an insight into the activities actually carried out by existing as well as new influence relationships.

6 South African Tourism, “Supplemental Statement,” U.S. Department of Justice, January 29, 2021, <https://efile.fara.gov/docs/603-Supplemental-Statement-20210129-38.pdf>.

7 Gordon Christopher Benjamin, “Supplemental Statement,” U.S. Department of Justice, November 17, 2020, <https://efile.fara.gov/docs/6482-Supplemental-Statement-20201117-7.pdf>.

8 CMGRP Entertainment, Inc., d/b/a/ Rogers & Cowan PMK, “Supplemental Statement,” U.S. Department of Justice, January 29, 2021, <https://efile.fara.gov/docs/6769-Supplemental-Statement-20210129-3.pdf>.

9 Gephardt Group Government Affairs, LLC, “Supplemental Statement,” U.S. Department of Justice, February 22, 2021, <https://efile.fara.gov/docs/5874-Supplemental-Statement-20210222-25.pdf>.

10 Barnes & Thornburg LLP, “Supplemental Statement,” U.S. Department of Justice, July 13, 2020, <https://efile.fara.gov/docs/6594-Supplemental-Statement-20200713-3.pdf>.

the relevant period,<sup>11</sup> while others disclosed only online activities such as webinars and seminars.<sup>12</sup>



People applaud from a balcony thanking COVID-19 medical workers in Barcelona, Spain. Source: David Ramos via Getty Images

## INFLUENCE AND LOBBYING AROUND COVID-19

Focusing on the substantive areas of interplay, we noted several distinct categories of influence and lobbying activities that addressed issues directly related to the COVID-19 pandemic. These centered around the following broad themes.

### Requests for Aid and Assistance

Along expected lines, a significant number of filings pertained to requests for foreign aid and assistance from the United States. These took the form of requests for direct aid and assistance, as well as other measures such as loan forgiveness. Examples include:

- A disclosure made by an agent acting on behalf of Ghana which revealed outreach to various U.S. stakeholders including Congress and the Administration for assistance to fight the pandemic. As per the filing, the goals of outreach were “debt forgiveness, emergency assistance, addressing supply chain challenges for medications and medical supplies.”<sup>13</sup>
- A similar filing on behalf of the Kyrgyz Republic disclosed contacts by its agent with “U.S. intelligence and the executive branch of the United States of America with respect to the COVID pandemic and economic assistance.”<sup>14</sup>

11 KRL International LLC, “Supplemental Statement,” U.S. Department of Justice, August 29, 2020, <https://efile.fara.gov/docs/5788-Supplemental-Statement-20200829-27.pdf>.

12 Malaysian Rubber Council, “Supplemental Statement,” U.S. Department of Justice, February 23, 2021, <https://efile.fara.gov/docs/5444-Supplemental-Statement-20210223-32.pdf>.

13 KRL International LLC, “Supplemental Statement,” U.S. Department of Justice, February 24, 2021, <https://efile.fara.gov/docs/5788-Supplemental-Statement-20210224-29.pdf>.

14 Dickens & Madson Canada Inc., “Supplemental Statement,” U.S. Department of Justice, January 18, 2021, <https://efile.fara.gov/docs/6200-Supplemental-Statement-20210118-14.pdf>.

- The Southern Transitional Council made appeals to various U.S. stakeholders for assistance with the pandemic as well as floods affecting the area. In addition, general awareness around the role of the Council was sought to be improved.<sup>15</sup>
- An agent acting on behalf of a company with Belarusian ties disclosed contacts with the State Department to discuss the possibility of “WB [likely World Bank] or US aid to Belarus relating to COVID.”<sup>16</sup>

It is not clear if any of these specific efforts were successful. However, there are at least a few reported instances of aid being disbursed to Ghana,<sup>17</sup> Belarus,<sup>18</sup> and the Kyrgyz Republic.<sup>19</sup> While it is out of the scope of this brief to examine the success of lobbying efforts, previous studies alongside anecdotal evidence hint at a positive correlation between



Medical staff tend to a COVID-19 patient at the Ankara City Hospital. Source: Chris McGrath via Getty Images

countries lobbying for COVID aid and then receiving it from the U.S.

### Publicity over Aid Efforts and Vaccine Diplomacy

Interestingly, influence activities around foreign aid did not end with requests. Several agents disclosed activities seeking to publicize the aid and assistance efforts of their foreign principals. In other words, foreign principals sought to curry favor with U.S. stakeholders by ensuring that their charitable and related endeavors were noticed. For example:

- A statement filed on behalf of Turkey disclosed extensive efforts over email to inform policymakers of Turkey’s delivery of PPP equipment to the United States.<sup>20</sup>

15 Southern Transitional Council (US), “Supplemental Statement,” U.S. Department of Justice, June 8, 2020, <https://efile.fara.gov/docs/6552-Supplemental-Statement-20200608-6.pdf>.

16 David F Gencarelli, “Supplemental Statement,” U.S. Department of Justice, November 11, 2020, <https://efile.fara.gov/docs/6706-Supplemental-Statement-20201111-2.pdf>.

17 US Embassy in Ghana. (2020, April 25). USA Delivers Critical Medical Supplies to Boost COVID-19 Testing Capacity in Ghana. Department of State. [https://gh.usembassy.gov/news-events/page/5/?search\\_query=COVID-19&taxcategory%5B0%5D=press-releases&date\\_m#038;tax\\_category%5B0%5D=press-releases&date\\_m](https://gh.usembassy.gov/news-events/page/5/?search_query=COVID-19&taxcategory%5B0%5D=press-releases&date_m#038;tax_category%5B0%5D=press-releases&date_m).

18 USAID. (2021, January 27). The U.S. Government’s COVID-19 Response in Belarus - Updated Jan 2021: Belarus. U.S. Agency for International Development. <https://www.usaid.gov/belarus/documents/us-government%E2%80%99s-covid-19-response-belarus-jan-2021>.

19 U.S. Embassy in the Kyrgyz Republic. (n.d.). CDC Provides Equipment to the Kyrgyz Republic, Increasing Its Monthly COVID Testing Capacity by More than 80,000. Department of State. [https://kg.usembassy.gov/news-events/page/2/?search\\_query=COVID&tax\\_category%5B0%5D=press-releases&date\\_m#038;tax\\_category%5B0%5D=press-releases&date\\_m](https://kg.usembassy.gov/news-events/page/2/?search_query=COVID&tax_category%5B0%5D=press-releases&date_m#038;tax_category%5B0%5D=press-releases&date_m).

20 Venable LLP, “Supplemental Statement,” U.S. Department of Justice, December 31, 2020, <https://efile.fara.gov/docs/5931-Supplemental-Statement-20201231-25.pdf>.

- A statement filed on behalf of Taiwan disclosed diplomatic exchanges to, among other things, “educate U.S. officials on the importance of U.S. - Taiwan trade relations as well advise of Taiwan’s international philanthropy in the wake of the COVID-19 pandemic.”<sup>21</sup>
- Similarly, a statement filed on behalf of India showcased efforts to highlight that country’s connection (as a leading vaccine manufacturing hub) to the global COVID-19 vaccine supply chain.<sup>22</sup>

At least some of these efforts may have paid off. For instance, subsequent U.S. aid to India acknowledged the latter’s contributions in the early stages of the pandemic.<sup>23</sup>



People in traffic wearing masks. Source: Nikolay Likomanov via Unsplash

## Publicity and Awareness over Issues relating to Pandemic Response

A number of foreign principals sought to ensure that U.S. stakeholders (including the press and public) were made aware of their (successful) pandemic response efforts. Often, these targeted policy-makers and press outlets. For instance:

- A statement filed on behalf of Cambodia disclosed efforts to inform U.S. policymakers about “how Cambodia is dealing so well with the COVID-19 crisis.”<sup>24</sup>
- Such efforts were also observed on behalf of non-state actors. For instance, an agent acting on behalf of VEB.RF, a Russian development institution, disclosed PR activities in the form of “press release and brochures to demonstrate VEB.RF’s compliance and transparency initiatives and COVID-19 response.”<sup>25</sup>

21 The Nickles Group, LLC, “Supplemental Statement,” U.S. Department of Justice, September 25, 2020, <https://efile.fara.gov/docs/6089-Supplemental-Statement-20200925-19.pdf>

22 Cornerstone Government Affairs Inc., “Supplemental Statement,” U.S. Department of Justice, March 3, 2021, <https://efile.fara.gov/docs/6401-Supplemental-Statement-20210303-9.pdf>

23 ‘India was there for us and we will be there for them’: President Biden on India’s COVID-19 crisis, Economic Times (April 27, 2021), <https://economictimes.indiatimes.com/news/international/world-news/biden-says-us-determined-to-help-india-amid-covid-19-crisis/articleshow/82250445.cms?from=mdr>

24 Brownstein Hyatt Farber Schreck, LLP, “Supplemental Statement,” U.S. Department of Justice, September 30, 2020, <https://efile.fara.gov/docs/5870-Supplemental-Statement-20200930-27.pdf>

25 Geopolitical Solutions LLC d/b/a/ Geopols, “Supplemental Statement,” U.S. Department of Justice, October 28, 2020, <https://efile.fara.gov/docs/6740-Supplemental-Statement-20201028-2.pdf>

- These efforts also focused on narrower issues around the pandemic, including matters of economic policy. For instance, the Philippines, through its Central Bank, retained a registered agent to provide assistance around strategic communications “to promote BSP’s economic initiative and economic messages internationally.”<sup>26</sup>

A common sector involved in this type of activity was tourism. Foreign government departments and tourism agencies sought to publicize their governments’ COVID-related successes at home, likely with a view towards promoting tourism or the roll-back of travel restrictions (if applicable). For instance:

- Statements filed on behalf of the Bahamas disclosed extensive PR efforts to spread awareness about entry restrictions to the Bahamas and to highlight its status as a safe tourist destination.<sup>27</sup>



*Train en route in Japan. Source: Matthieu Gouiffes via Unsplash*

- Statements filed on behalf of the Hong Kong Trade Development Council disclosed contacts with policymakers to discuss issues impacting Hong Kong and the U.S. including “travel, tourism and COVID response.”<sup>28</sup>
- An Exhibit A/B filed on behalf of Japan disclosed its retention of a registered agent to conduct “media outreach and advertising campaigns” intended to support goals including “the promotion of tourism in Japan, as well as raise awareness of Japan’s public health initiatives and COVID response.”<sup>29</sup>

Others disclosed activities intended to raise awareness about specific concerns,<sup>30</sup> including:

<sup>26</sup> BCW LLC, “Exhibit AB,” U.S. Department of Justice, May 15, 2020, <https://efile.fara.gov/docs/6227-Exhibit-AB-20200515-23.pdf>

<sup>27</sup> Bahamas Ministry of Tourism, “Supplemental Statement,” U.S. Department of Justice, March 6, 2021, <https://efile.fara.gov/docs/2310-Supplemental-Statement-20210306-35.pdf>.

<sup>28</sup> Venable LLP, “Supplemental Statement,” U.S. Department of Justice, December 31, 2020, <https://efile.fara.gov/docs/5931-Supplemental-Statement-20201231-25.pdf>

<sup>29</sup> Seven Letter, “Exhibit AB,” U.S. Department of Justice, August 4, 2020, <https://efile.fara.gov/docs/6847-Exhibit-AB-20200804-1.pdf>

<sup>30</sup> Although these are likely to have been tied to other objectives (such as requesting foreign aid, assistance, or improving publicity), many filings did not contain enough details to discern if these were present in a given instance.

- An agent registered on behalf of a local government in Japan disclosed contacts with executive branch officials on the subject of “COVID-19 spread in U.S. Military Bases in Okinawa.”<sup>31</sup>
- An agent registered on behalf of Bermuda disclosed contacts with Congressional offices to discuss “actions taken by the U.S. Customs and Border Protection that delayed the delivery of medical supplies from the United States to Bermuda in response to the COVID-19 pandemic.”<sup>32</sup>



Organized and packaged medical supplies in a drawer. Source: Ibrahim Boran via Unsplash

## Advocacy around Commerce and Business

Several statements also disclosed issues relating to trade, commerce, and business. These primarily consisted of online seminars and other such events. Often, these were organized by trade associations or other industry groups and sought to discuss or highlight certain advocacy around issues relating to the interplay of COVID and trade/commerce.

- A statement filed on behalf of representatives of German industry associations disclosed efforts to engage with Commerce Department officials to discuss “challenges facing German companies during the pandemic, and the overall state of US-German economic relations.”<sup>33</sup>
- A statement filed on behalf of Huawei Technologies disclosed efforts by the company to engage with U.S. technology news portals to highlight the role of (likely Huawei’s) artificial

31 Okinawa Prefecture DC Office, Inc., “Supplemental Statement,” U.S. Department of Justice, January 29, 2021, <https://efile.fara.gov/docs/6332-Supplemental-Statement-20200129-11.pdf>

32 theGroup DC, LLC, “Supplemental Statement,” U.S. Department of Justice, May 29, 2020, <https://efile.fara.gov/docs/6388-Supplemental-Statement-20200529-7.pdf>

33 Representative of German Industry and Trade (RGIT), “Supplemental Statement,” U.S. Department of Justice, March 1, 2021, <https://efile.fara.gov/docs/4274-Supplemental-Statement-20210301-35.pdf>

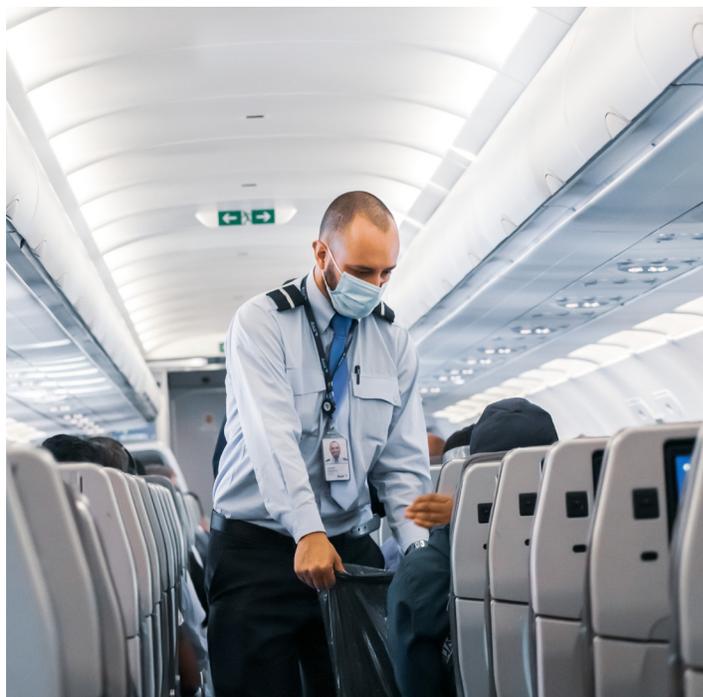
intelligence and connectivity to fight the COVID-19 pandemic.<sup>34</sup>

- Several trade- and commerce-related entities also disclosed the organization of webinars on various topics connected with the impact of the pandemic.<sup>35</sup>

## Crisis Response, Consulting, and Related Services

Agents also undertook other activities relating to the pandemic on behalf of their foreign principals. Often this took the form of assisting or advising on pandemic response, crisis response, legal advice, PR support functions, or other unspecified consulting services.

- Similar to the example above, a registered agent of the Bahamas disclosed providing assistance to its principal “in responding to crisis situations in The Bahamas that impacted tourism, such as the COVID-19 Pandemic.”<sup>36</sup>
- The registered agent representing the Marshall Islands, in addition to lobbying activities, disclosed advisory services in relation to the US CARES Act and obtaining assessments of the impact of COVID-19 on the principal’s economy.<sup>37</sup>
- Similarly, the Kurdistan Regional Government and the Government of Haiti received, from their registered agents, advice on “critical support and assistance to help them combat the COVID-19 virus and to work with the global community to prevent its spread.”<sup>38</sup>



Masked attendant tends to traveling tourists. Source: Lukas Souza via Unsplash

34 Pivot Integrated Communications, a division of BCW LLC, “Supplemental Statement,” U.S. Department of Justice, November 11, 2020, <https://efile.fara.gov/docs/6736-Supplemental-Statement-20201111-2.pdf>

35 JETRO Los Angeles, “Supplemental Statement,” U.S. Department of Justice, January 29, 2021, <https://efile.fara.gov/docs/1833-Supplemental-Statement-20210129-35.pdf>

36 IPG DXTRA, Inc. d/b/a Weber Shandwick, “Supplemental Statement,” U.S. Department of Justice, January 29, 2021, <https://efile.fara.gov/docs/3911-Supplemental-Statement-20210129-35.pdf>

37 The Oliver Group, Inc., “Supplemental Statement,” U.S. Department of Justice, June 29, 2020, <https://efile.fara.gov/docs/6558-Supplemental-Statement-20200629-4.pdf>

38 Dentons US LLP, “Supplemental Statement,” U.S. Department of Justice, April 30, 2020, <https://efile.fara.gov/docs/6284-Supplemental-Statement-20200430-10.pdf>

Some agents also conducted market research or participated in informational events on behalf of their foreign principals. These activities likely pertained to perception analysis or reputation monitoring in relation to the principal's pandemic situation or response. Notable examples include:

- Qatar obtained from its registered agent, “information and analysis regarding current affairs in the United States based on publicly available sources to assist planning and preparations regarding delivery of the World Cup in the midst of the COVID-19 crisis.”<sup>39</sup>
- Korean principals which used their registered agents to conduct market research<sup>40</sup> as well as in relation to “monitoring activities, researching and gathering information, and providing legal analyses with respect to new developments” on various pandemic-related issues.<sup>41</sup>



World Health Organization conference. Source: Violaine Martin via Flickr

- The World Health Organization retained a registered agent to assist with “influencer understanding, message testing and planning.” This tasking stemmed from concerns around “criticism and assertions leveled against the World Health Organization (WHO) and media coverage that could undermine WHO as a trusted and critical information source on global public health issues.”<sup>42</sup>
- The Kyoto City Tourism Association also retained a registered agent to assist with “collect[ing] information on the local market trends, etc. and transmit[ing] the correct information related to Kyoto tourism in preparation for the recovery period.”<sup>43</sup>

39 Lumen8 Advisors, LLC, “Supplemental Statement,” U.S. Department of Justice, October 30, 2020, <https://efile.fara.gov/docs/6537-Supplemental-Statement-20201030-5.pdf>

40 Korea Ewes AMP Startups Agency VSA Office, Supplemental Statement,” U.S. Department of Justice, December 18, 2020, <https://efile.fara.gov/docs/6195-Supplemental-Statement-20201218-15.pdf>.

41 Arnold & Porter Kaye Scholer LLP, “Supplemental Statement,” U.S. Department of Justice, January 30, 2021, <https://efile.fara.gov/docs/1750-Supplemental-Statement-20210130-32.pdf>

42 Hill and Knowlton Strategies, LLC, “Exhibit AB,” U.S. Department of Justice, July 14, 2020, <https://efile.fara.gov/docs/3301-Exhibit-AB-20200714-38.pdf>

43 Kyoto City Tourism Association,” Exhibit AB,” U.S. Department of Justice, December 14, 2020, <https://efile.fara.gov/docs/6549-Exhibit-AB-20201214-55.pdf>

## Local Activities (within the United States)

Foreign principals conducted several pandemic-related activities within the United States at the state and local levels.

- An agent acting on behalf of a US-based aerospace company (with foreign ties) disclosed contacting local colleges and universities about “student COVID-19 relief.”<sup>44</sup>
- An agent acting on behalf of Qatar also disclosed contacts with “the mayor of El Paso to inquire what needs his city may have arising from the COVID-19 pandemic.”<sup>45</sup>



On-campus Covid-19 testing site at a U.S. university. Source: Sean Nealon via Flickr

## Influence Activities around Foreign Policy

In addition to the categories above which addressed the interplay of the pandemic and foreign influence, some agents used COVID-19 to try to advance other objectives including broader, but not unrelated, strategic or foreign policy objectives.

- For instance, Taiwan used the opportunity to raise the issue of its membership at the World Health Organization.<sup>46</sup>
- Similarly, an agent acting on behalf of Turkey disclosed its drafting of potential diplomatic correspondence intended to be shared with the Department of Justice “regarding expedited treatment of a Turkish national’s prison transfer request in light of COVID-19.”

<sup>44</sup> Ott, Bielitzki & O’Neill PLLC, “Supplemental Statement,” U.S. Department of Justice, February 25, 2021, <https://efile.fara.gov/docs/6573-Supplemental-Statement-20210225-6.pdf>

<sup>45</sup> Mr. Charles Graves Untermeyer, “Supplemental Statement,” U.S. Department of Justice, December 28, 2020, <https://efile.fara.gov/docs/6751-Supplemental-Statement-20201228-2.pdf>

<sup>46</sup> Gephardt Group Government Affairs, LLC, “Supplemental Statement,” U.S. Department of Justice, August 4, 2020, <https://efile.fara.gov/docs/5874-Supplemental-Statement-20200804-24.pdf>

## CONCLUSION

As the above examples show, the COVID-19 pandemic had wide-ranging implications for foreign influence and lobbying activities within the United States. These have manifested both in terms of impact on the practice and methods of lobbying, as well as on its subject matter and objectives. While the pandemic has fostered new influence relationships, it has also had negative effects on several existing ones.

All in all, these observations are notable for how they describe influence activities in general as well for what they do not show. It is not likely the case that the states with the most critical needs were the ones that were most vociferous or sought to achieve the most through lobbying. For instance, foreign states that requested aid from the United States are likely to be a small subset of the states that need it. In this manner, lobbying and influence activities can create new inequalities or exacerbate existing ones by leading to an inefficient allocation of resources.

Taken with prior research on the effectiveness of lobbying campaigns, these observations go some way towards showing that lobbying can serve as a rite of passage to those seeking aid and assistance. While further research will be needed to correlate COVID-related lobbying with successful outcomes, this brief is intended to begin discussions in this direction. If influence around COVID is correlated with aid and assistance, this can raise serious questions around foreign policy and the allocation of resources to fight the global pandemic. This also means that aid need not be flowing to the countries that need it most or those that use it best — creating concerns around corruption and diversion.

Most critically, if a positive correlation is found — as is likely — there is a case to be made to consider alternative approaches to aid allocation. The loudest or most vociferous voices in Washington should not automatically be entitled to the most aid. If they are, the entire system may require a rethink — and a case may be made for a more objective or evidence-based approach to resource allocation.

Within this context, it is hoped that this initial effort will stimulate deeper research and study into some of the indicative trends highlighted above — both in relation to FARA filings in general as well as the unseen ways in which the pandemic is shaping the international order. In particular, future efforts may consider several issues not explored here including: the identities of the foreign countries seeking aid within context of their developmental statuses, the effectiveness of lobbying based on a correlation between efforts and aid ultimately received, comparisons with domestic lobbying on similar issues, and connections between broader inequalities on issues such as global health and foreign influence/lobbying efforts.