



# TURKEY'S LOBBY IN THE UNITED STATES

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FOREIGN INFLUENCE TRANSPARENCY INITIATIVE



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## About the Center for International Policy

The Center for International Policy (CIP) is an independent nonprofit center for research, public education, and advocacy on U.S. foreign policy. CIP works to make a peaceful, just, and sustainable world the central pursuit of U.S. foreign policy. CIP was founded in 1975 in the wake of the Vietnam War by former diplomats and peace activists who sought to reorient U.S. foreign policy to advance international cooperation as the primary vehicle for solving global challenges and promoting human rights. Today, we bring diverse voices to bear on key foreign policy decisions and make the evidence-based case for why and how the United States must redefine the concept of national security in the 21st century.

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

## ACKNOWLEDGEMENTS

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*Cover photo is a Turkish service member adjusting the Turkish flag prior to raising it during a Republic Day, Oct. 29, 2013. Photo via Staff Sgt. Richard Andrade/DVIDS*



*Chairman of Joint Chiefs of Staff meets with Marine Corps at the U.S. Embassy in Ankara, 2016. Photo via Dominique Pineiro/ DVIDS*

## EXECUTIVE SUMMARY

While relations between Ankara and Washington have always been delicate, Turkish President Recep Tayyip Erdogan's recent controversial foreign policy decisions and turn towards authoritarianism at home have, arguably, made U.S.-Turkey relations more strained than ever before.

Following an attempted 2016 coup in Turkey, Erdogan used the incident to purge his political opponents from the Turkish military and bureaucracy and grant himself vastly expanded powers through presidential rule. Abroad, his unusually assertive Turkish foreign policy—including recent military interventions and support for proxy forces in Syria, Libya, Iraq, and Nagorno-Karabakh—has at times clashed with U.S. interests and Turkey's other NATO allies.

Additionally, specific sources of tension in U.S.-Turkey relations include: Turkey's purchase of the Russian S-400 air defense system; the refusal of the U.S. to extradite Fethullah Gulen, a Turkish cleric who Erdogan accuses of masterminding the 2016 coup attempt; and Turkey's intervention in Syria in opposition to U.S. support for the Kurdish People's Protection Units (YPG).

While seemingly distinct sources of tension, all of these issues have at least one thing in common: lobbying. Each of these issues that has deeply strained relations between the U.S. and Turkey has been the object of considerable lobbying, public relations, and related attempts at influence by Turkey's foreign agents in the U.S.

The remainder of this report is the story of how Turkey's agents attempted—and largely failed—to shift U.S. stances on these and other issues. To tell this story, we at the Foreign



Influence Transparency Initiative (FITI) analyzed every Foreign Agents Registration Act (FARA) document filed by organizations registered to work on behalf of Turkish clients in 2020. From these documents, we recorded every single “political activity” done for those clients, every campaign contribution mentioned in these FARA filings, every piece of “informational material” distributed on Turkey’s behalf, and every dollar these organizations reported receiving from their Turkish clients.

## KEY FINDINGS

- 11 organizations were registered under FARA to work on Turkey’s behalf in 2020;
- Those organizations reported making 2,319 contacts on behalf of their Turkish clients;
- 568 campaign contributions, totaling \$526,177 made by those firms and their registered foreign agents;
- 17 elected officials received nearly \$37,000 in contributions from firms that had contacted their offices on behalf of Turkish clients.
- 1 Senator received a campaign contribution from a firm that had contacted her office on Turkey’s behalf that same day.



*Inspection of a Patriot missile battery at a Turkish military base in Gaziantep, Turkey, 2013. Photo via Master Sgt. Sean Worrell/ DVIDS*

## INTRODUCTION

U.S.-Turkey relations, long held together by their mutual membership in NATO and Turkey's strategic location, have become increasingly strained in the past decade as Turkish President Recep Tayyip Erdogan has pursued an independent and aggressive foreign policy abroad, while cracking down on democracy at home. After becoming Prime Minister in 2003, Erdogan briefly attempted to portray himself as a liberal modernizer as he sought to bring Turkey into the European Union.<sup>1</sup> However, in the past decade, Erdogan has crushed dissent and centralized power.<sup>2</sup> This authoritarian turn has been particularly noticeable since 2016 as Erdogan used an attempted coup in Turkey as justification to purge his political opponents from the Turkish military and bureaucracy and grant himself vastly expanded powers through presidential rule.

Erdogan has also implemented an unusually assertive Turkish foreign policy—including recent military interventions and support for proxy forces in Syria, Libya, Iraq, and Nagorno-Karabakh—that has at times clashed with U.S. interests and its other NATO allies.<sup>3</sup> While relations between Ankara and Washington have always been delicate, Erdogan's controversial foreign policy decisions and turn towards authoritarianism have, arguably, made U.S.-Turkey relations more strained than ever before.

Specific sources of tension in U.S.-Turkey relations include: Turkey's purchase of the Russian S-400 air defense system; the refusal of the U.S. to extradite Fethullah Gulen, a Turkish cleric who Erdogan accuses of masterminding the 2016 coup attempt; and Turkey's intervention in Syria in opposition to U.S. support for the Kurdish People's Protection Units (YPG).

Turkey's 2017 agreement to purchase the Russian S-400 air defense system immediately triggered strong opposition from the U.S. and NATO. The U.S. asserts that the presence of a Russian air defense system on NATO soil could allow Russia to access sensitive information and would compromise NATO military systems.<sup>4</sup> More broadly, Turkey's interest in purchasing a major defense system from Russia—and its insistence on continuing to do so in the face of opposition from its NATO allies—signified Ankara's drift away from NATO and

1. Peter S. Goodman, "The West Hoped for Democracy in Turkey. Erdogan Had Other Ideas," *The New York Times*, August 18, 2018, <https://www.nytimes.com/2018/08/18/business/west-democracy-turkey-erdogan-financial-crisis.html>.

2. Carlotta Gall, "Erdogan, Flush With Victory, Seizes New Powers in Turkey," *The New York Times*, July 19, 2018, <https://www.nytimes.com/2018/07/19/world/asia/turkey-erdogan.html>.

3. David Gardner, "Erdogan is in Danger of Overreaching with Foreign Interventions," *The Financial Times*, September 30, 2020, <https://www.ft.com/content/05f817a2-ed1e-4c88-b204-494870209417>.

4. Karen DeYoung and Kareem Fahim, "U.S. Sanctions NATO Ally Turkey Over its Purchase of Russian Missile Defense System," *The Washington Post*, December 14, 2020, [https://www.washingtonpost.com/national-security/us-sanctions-nato-ally-turkey-over-its-purchase-of-russian-missile-defense-system/2020/12/14/f442c342-3e38-11eb-8bc0-ae155bee4aff\\_story.html](https://www.washingtonpost.com/national-security/us-sanctions-nato-ally-turkey-over-its-purchase-of-russian-missile-defense-system/2020/12/14/f442c342-3e38-11eb-8bc0-ae155bee4aff_story.html).

raised questions about the long-term prospects of the U.S.-Turkey relationship.<sup>5</sup> In response to Turkey's S-400 deal, the U.S. removed Turkey from the F-35 program, Congress placed a hold on all arms sales to Turkey, and the Trump Administration ultimately imposed sanctions on Turkey in late 2020. As Turkey has yet to fully activate the S-400 system, both countries remain engaged in a tense back-and-forth over the issue.<sup>6</sup>

President Erdogan accuses Fethullah Gulen, a Turkish cleric who lives in Pennsylvania and operates a network of charter schools, of planning the 2016 coup attempt and using his religious movement to establish a "parallel state" in Turkey.<sup>7</sup> Turkey's persistent but unsuccessful efforts to get Gulen extradited have led to an ongoing dispute between the U.S. and Turkey.<sup>8</sup> Turkey's interior minister even recently accused the U.S. of using Gulen to carry out the attempted coup.<sup>9</sup>

Another key source of tensions in U.S.-Turkey relations is U.S. support for the YPG, the Kurdish militia that makes up a portion of the multiethnic Syrian Democratic Forces (SDF), and Turkey's interventions against the YPG in Northern Syria. While the YPG has been a vital U.S. partner in the fight against ISIS, Turkey views the YPG as synonymous with the Kurdistan Workers' Party (PKK), a Kurdish separatist insurgent group that Turkey has fought for decades. Turkey immediately objected to the Trump administration's decision to arm the YPG in 2017 and launched a controversial ground invasion against Kurdish forces in northern Syria after a partial U.S. withdrawal in 2019.<sup>10</sup> Turkey's ground offensive into Syria triggered strong bipartisan outrage and led President Trump to take the unprecedented step of sanctioning Turkish officials in response to the offensive.<sup>11</sup>

5. "U.S. Maintains Firm Stance On Turkey's Purchase Of Russian Missile-Defense System," Radio Free Europe/Radio Liberty, February 6, 2021, <https://www.rferl.org/a/turkey-russia-missile-defense-us/31089011.html>

6. Amanda Macias, "U.S. Sanctions Turkey Over Purchase of Russian S-400 Missile System," CNBC, December 14, 2020, <https://www.cnbc.com/2020/12/14/us-sanctions-turkey-over-russian-s400.html>

7. Piotr Zalewski, "Erdogan Turns on Gulenists' 'Parallel State' in Battle for Power," The Financial Times, May 6, 2014, <https://www.ft.com/content/0e7a3854-cc98-11e3-ab99-00144feabdc0>; Sasha Ingber, "Trump Says Extraditing Turkish Cleric Fethullah Gulen Is 'Not Under Consideration'," National Public Radio, November 17, 2018, <https://www.npr.org/2018/11/17/668898939/trumps-says-extraditing-turkish-cleric-fethullah-gulen-is-not-under-consideration>

8. Carlotta Gall and Abdi Latif Dahir, "Turkey Claims to Have 'Captured' Cleric's Relative in Kenya," The New York Times, May 31, 2021, <https://www.nytimes.com/2021/05/31/world/europe/turkey-kenya-gulen.html>

9. "Turkish Minister Says U.S. Behind 2016 Failed Coup - Hurriyet," Reuters, February 4, 2021, <https://www.reuters.com/article/turkey-security-usa-int/turkish-minister-says-u-s-behind-2016-failed-coup-hurriyet-idUSKBN2A41NF>

10. Sirwan Kajjo, "Syrian Kurds Optimistic About Continued US Support Under Biden Presidency," Voice of America, November 11, 2020, <https://www.voanews.com/extremism-watch/syrian-kurds-optimistic-about-continued-us-support-under-biden-presidency>

11. Alan Rappeport and Michael Crowley, "Trump Imposes Sanctions on Turkey as Syria Conflict Intensifies," The New York Times, October 14, 2019, <https://www.nytimes.com/2019/10/14/us/politics/trump-turkey-tariffs.html>

As Turkey continues to battle the YPG, the issue remains a major source of tension between the U.S. and Turkey.<sup>12</sup>

Without the Cold War security dynamics that underpinned their relationship for decades, the divergence between the interests of the U.S. and Turkey have become more pronounced in the 21st century. This, in concert with Erdogan's assertive foreign policy and autocratic turn, has helped bring the U.S.-Turkey relationship to arguably its lowest point in decades.

Yet, all of these issues have at least one thing in common: lobbying. Each of these issues that has deeply strained relations between the U.S. and Turkey has been the object of considerable lobbying, public relations, and related attempts at influence by Turkey's foreign agents in the U.S.

The remainder of this report is the story of how Turkey's agents attempted, and largely failed, to shift U.S. stances on these and other issues. It's the story of the Turkey lobby in 2020 which made 2,319 political contacts through the 11 different firms that served as Turkey's registered foreign agents in the U.S. It's a story of more than \$5 million spent by Turkish clients on these firms.<sup>13</sup> It's a story of \$526,000 in campaign contributions made by foreign agents working on behalf of Turkey. It's a story of how a large chunk of that money went to politicians who were contacted by Turkey's agents, at least one even receiving a contribution the same day they met with a Turkey lobbyist.

To tell this story, we at the Foreign Influence Transparency Initiative (FITI) analyzed every Foreign Agents Registration Act (FARA) document filed by organizations registered to work on behalf of Turkish clients in 2020. From these documents, we recorded every single "politi-

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12. Max Hoffman and Alan Makovsky, "Northern Syria Security Dynamics and the Refugee Crisis," Center for American Progress, May 26, 2021, <https://www.americanprogress.org/issues/security/reports/2021/05/26/499944/northern-syria-security-dynamics-refugee-crisis/>

13. This is revenue that was reported in 2020 filings. This money may not necessarily have been received in 2020 and may not have been intended to pay for work conducted in 2020. 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 doesn't have to indicate which is the case in its FARA filings. In this analysis, all spending figures were those reported in 2020 FARA filings, unless otherwise noted.

cal activity” done for those clients, every campaign contribution mentioned in these FARA filings, every piece of “informational material” distributed on Turkey’s behalf, and every dollar these organizations reported receiving from their Turkish clients.<sup>14</sup>

## POLITICAL ACTIVITIES

FARA requires registered foreign agents to report all of their “political activities,” which the statute defines broadly to include anything that will, “influence any agency or official of the government of the United States or any section of the public within the United States with reference to...the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.”<sup>15</sup> This covers much of the lobbying and public relations work FARA registrants do on behalf of their foreign clients. Thus, collectively, the reports of these activities provide a fairly comprehensive picture of what a country’s FARA registered agents are doing in America - and what issues matter to them.

And, the filings reveal that Turkey’s agents were doing quite a lot. Specifically, in their 2020 FARA filings, firms reported engaging in 2,319 political activities on behalf of their Turkish clients. In this section we break down these political activities to identify the most active firms, and the most contacted organizations, Congressional offices, and media outlets.

### ■ The Firms

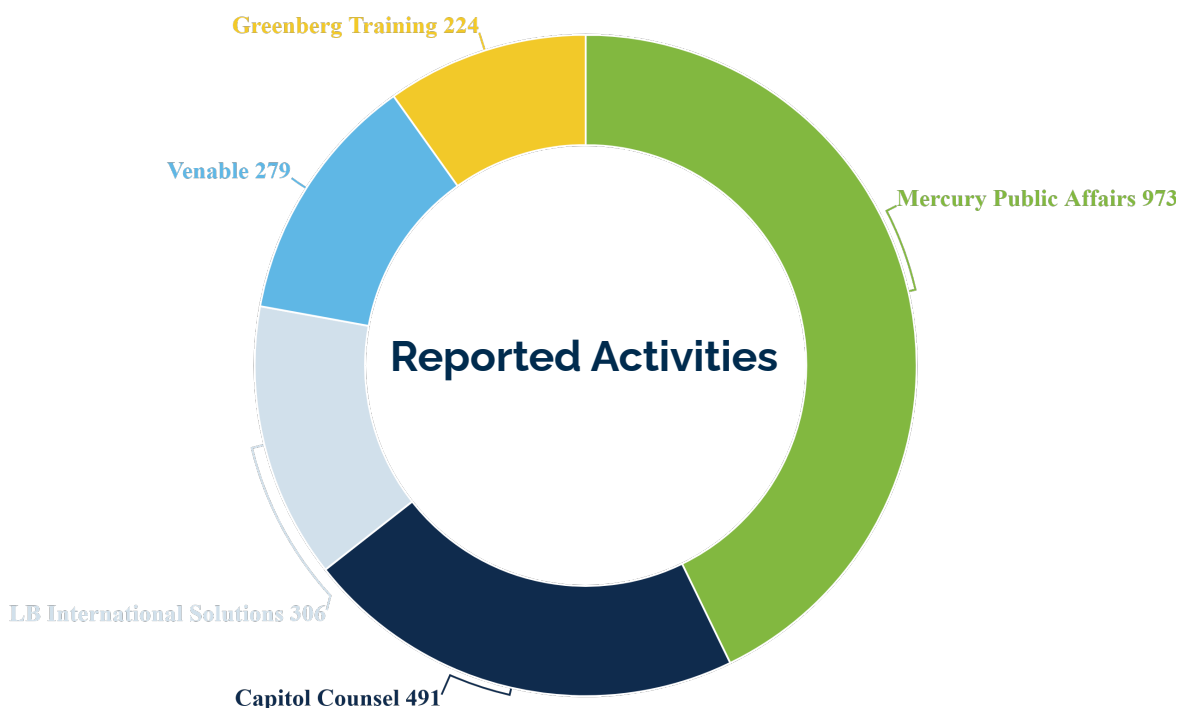
11 different firms were registered under FARA to represent Turkish interests at some point in 2020, and filed at least one Supplemental Statement, which are FARA filings made every six-months that provide a host of information, including descriptions of the work done on foreign clients’ behalf and any campaign contributions made by these FARA registrants. The five most active firms, in terms of reported political activities done on behalf of their Turkish clients, are listed in Graph 1.

14. 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 late 2020 occurred in late 2019. Similarly, some of the activities and contributions that occurred in late 2020 will only be reported in the first half of 2021.

15. Foreign Relations and Intercourse (2010 version) U.S. Code 22 § 611 (o). <https://www.gpo.gov/fdsys/pkg/US-CODE-2009-title22/pdf/USCODE-2009-title22-chap11-subchapII.pdf>.



## GRAPH 1: THE 5 MOST ACTIVE FIRMS REPRESENTING TURKEY IN THE U.S. IN 2020



With 973 reported political activities, Mercury Public Affairs was, by far, the most active FARA registrant working on Turkey's behalf in 2020. Mercury—a self-proclaimed “high stakes strategy firm,” with twenty-two offices worldwide<sup>16</sup>—focused overwhelmingly on influencing the media (371 reported contacts) and Congress (405 reported contacts) on behalf of their clients, the Embassy of the Republic of Turkey and the Turkey—U.S. Business Council. Despite this considerable workload, Mercury, along with Greenberg Traurig, ultimately cut ties with the Turkish government in October 2020 under pressure from Armenian-American activists amidst tensions from the Nagorno-Karabakh conflict.<sup>17</sup>

After Mercury, Capitol Counsel was the most active firm on Turkey's behalf, reporting 491 political activities in its 2020 FARA filings. Despite making separate FARA filings, Capitol Counsel along with Venable were actually working on Turkey's behalf through Greenberg Traurig. All three firms were focused almost exclusively on lobbying Members of Congress and, as is discussed in much greater detail below, their primary focus was on arms sales issues.

16. “About Mercury,” Mercury LLC, <https://www.mercuryllc.com/about/>

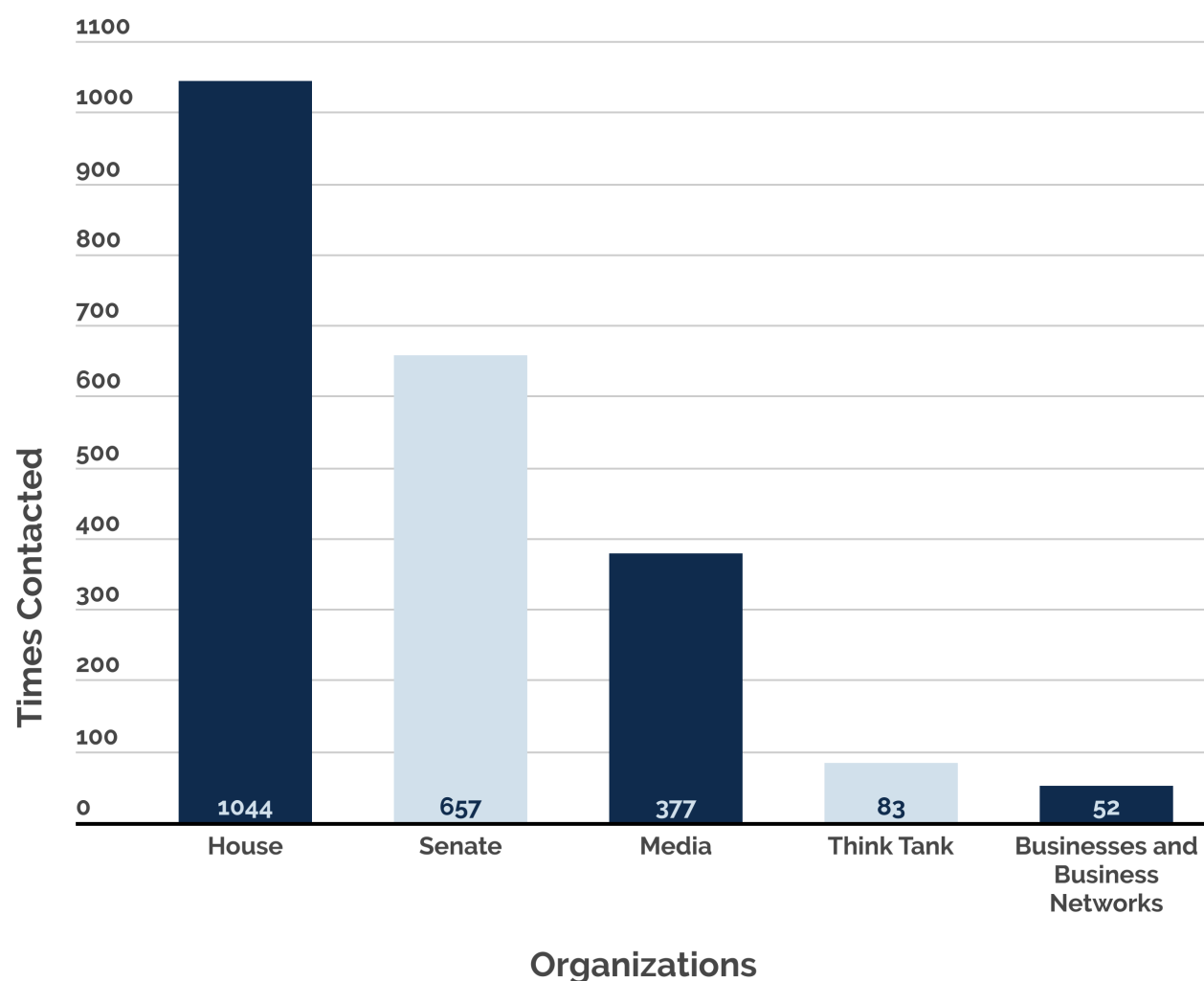
17. Theodoric Meyer, “Greenberg Traurig drops Turkey,” Politico, November 2020, <https://www.politico.com/newsletters/politico-influence/2020/11/06/greenberg-traurig-drops-turkey-791451>

LB International Solutions-whose President, Lydia Borland, was the firm's sole lobbyist working for Turkey—<sup>18</sup> though considerably smaller than the other perennial lobbying powerhouses listed in Table 1 reported 306 political activities on Turkey's behalf in 2020.

## ■ Organizations Contacted

In 2020 the eleven organizations registered under FARA to work on Turkey's behalf reported making 2,319 contacts for their Turkish clients. Graph 2 provides a list of the organizations most contacted by Turkey's foreign agents.

**GRAPH 2: TOP ORGANIZATIONS CONTACTED  
BY TURKEY'S FOREIGN AGENTS**



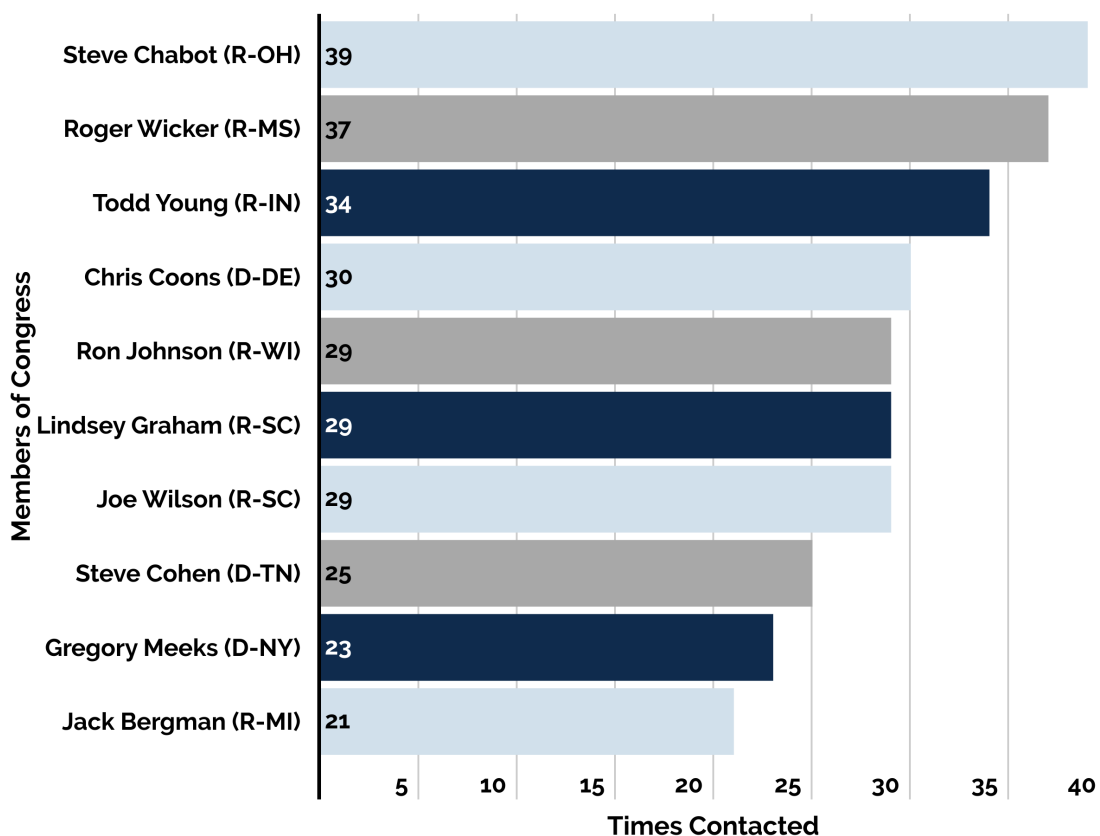
As Graph 2 indicates, the U.S. Congress was the primary target of Turkey's foreign agents. Congressional offices in the House and Senate were contacted 1,701 times more than two-

18. Lydia Borland, "Short Form Registration Statement," U.S. Department of Justice, March 3, 2014, <https://efile.fara.gov/docs/6210-Short-Form-20140303-2.pdf>

thirds of all contacts reported by Turkey's agents.

These lobbying efforts were heavily focused on members of committees involved in legislation that could impact U.S. arms sales to Turkey or result in the imposition of sanctions on Turkey. For example, the most contacted Congressional Committees by Turkey's lobbyists were the House Committee on Foreign Affairs (45 contacts), the committee responsible for a hold placed on arms sales to Turkey, and the House Committee on Armed Services (42 contacts), a committee intimately involved in the drafting of the National Defense Authorization Act (NDAA). Additionally, all but one of the top 10 most frequently contacted members of Congress, as listed in Graph 3, served on either the House Committee on Foreign Affairs, the Senate Foreign Relations Committee, the House Committee on Armed Services, or the Senate Armed Services Committee. The three members of Congress contacted most by Turkish foreign agents in 2020 were: Congressman Steve Chabot (R-OH), a member of the House Committee on Foreign Affairs; Senator Roger Wicker (R-MS), a member of the Senate Armed Services Committee; and Senator Todd Young (R-IN), a member of the Senate Foreign Relations Committee. It's also worth noting that most of the members listed in Graph 3 are part of the Congressional Caucus on Turkey.

**GRAPH 3: CONGRESSIONAL OFFICES CONTACTED MOST BY TURKEY'S AGENTS**





It's worth noting that some of the Congressional offices contacted most by Turkey's lobbyists were actually the staunchest critics of Turkey. Aside from Steve Chabot, the office of Roger Wicker, for example, was contacted more than any other, yet Wicker was an outspoken critic of Turkey and, specifically, President Erdogan. In April 2019, he penned a Washington Post op-ed that blasted Erdogan for holding an American pastor hostage.<sup>19</sup> He also introduced the "Defending United States Citizens and Diplomatic Staff from Political Prosecutions Act of 2019," that would allow the President to impose sanctions on anyone the President determines is responsible for unjust political detentions.<sup>20</sup>

After Congress, media outlets were the most common targets of Turkey's foreign agents. Of the 377 times media were contacted, the vast majority went to just a handful of top media outlets. Specifically, The New York Times (83), Bloomberg (52), The Washington Post (37), CNN (35), and The Wall Street Journal (34) were the top 5 media outlets most frequently contacted by Turkish foreign agents in 2020. Most of these contacts were done through email, with almost half (185) being "in case you missed it" weekly update emails sent by Mercury Public Affairs to media outlets.



*New York Times, 2020. Photo via Sam Chills/Flickr*

But, the public relations professionals on Turkey's payroll were also actively working to spin the media narrative in the U.S., reporting 49 separate instances of submitting pitches for

19. Roger Wicker, "The U.S. Must stand up to Erdogan and his politically motivated detentions," The Washington Post, April 9, 2019, <https://www.washingtonpost.com/opinions/2019/04/09/us-must-stand-up-erdogan-his-politically-motivated-detentions/>

20. S.1075 - 116th Congress, "Defending United States Citizens and Diplomatic Staff from Political Prosecutions Act of 2019," April 9, 2019, <https://www.congress.gov/bill/116th-congress/senate-bill/1075>



stories, op-eds, or letters to the editor in 2020. Letters to the editor submitted by Turkish foreign agents typically sought to push back on critical stories such as a *New York Times* article critiquing Turkish foreign policy under Erdogan and a Washington Post article alleging that the Turkey-U.S. Business Council chairman was involved in corrupt business dealings surrounding the building of Trump Towers Istanbul.<sup>21</sup> In addition to submitting press releases or pitches for stories, at least 39 of these media contacts invited members of the media to attend events, such as a series of Turkey-U.S. Business Council webinars moderated by New York Times columnist Tom Friedman, that were hosted by Turkish foreign principals, and featured prominent politicians, like Senator Lindsey Graham (R-SC).<sup>22</sup>

While Turkey lobbyists primarily focused their efforts on members of Congress and the media, they also made 83 contacts to think tanks in 2020. And, just as previous FITI reports have documented the connection between a foreign governments' lobbyists and the think tanks it funds, here too we find that four of the think tanks contacted by Turkish lobbyists in 2020 receive funding from the Turkish government or Turkey-focused non-governmental organizations. Specifically: the Brookings Institution and the German Marshall Fund of the United States received funding from the Turkish Industry and Business Association;<sup>23</sup> the Center for Strategic and International Studies received at least \$100,000 from the Turkish government in 2019 to fund its Regional Studies program;<sup>24</sup> and the Center for American Progress received funding from the Centre for Applied Turkey Studies (CATS), a center at the German Institute for International and Security Affairs (SWP) that "acts as a hub and curator of an international network of European and Turkish think tanks and research institutions."<sup>25</sup>

## THE ISSUES

### ■ S-400, F-35, and Arms Sale Freeze

While Turkey has remained committed to acquiring the Russian S-400 air defense system in

21. Steven Erlanger, "Turkish Aggression is NATO's 'Elephant in the Room,'" *The New York Times*, August 5, 2020, <https://www.nytimes.com/2020/08/03/world/europe/turkey-nato.html>; David Ignatius, "Trump's corrupt dealings with Turkey are some of the most startling stories in Bolton's book," June 23, 2020, [https://www.washingtonpost.com/opinions/global-opinions/trumps-corrupt-dealings-with-turkey-are-some-of-the-most-startling-stories-in-boltons-book/2020/06/23/0c24a5a2-b59a-11ea-a8da-693df3d7674a\\_story.html](https://www.washingtonpost.com/opinions/global-opinions/trumps-corrupt-dealings-with-turkey-are-some-of-the-most-startling-stories-in-boltons-book/2020/06/23/0c24a5a2-b59a-11ea-a8da-693df3d7674a_story.html)

22. "Informational Materials," U.S. Department of Justice, April 9, 2020, <https://efile.fara.gov/docs/6170-Informational-Materials-20200409-371.pdf>

23. "The Brookings Institution's Contributors List", The Brookings Institution, <https://www.brookings.edu/wp-content/uploads/2016/07/The-Brookings-Institutions-Contributors-List-Fiscal-Year-2016.pdf>, "Our Partners", The German Marshall Fund of the United States, <https://www.gmfus.org/our-partners>

24. Government Donors, Center for Strategic and International Studies, <https://www.csis.org/government-donors>.

25. "Centre for Applied Turkey Studies (CATS)", The German Institute for International and Security Affairs, <https://www.swp-berlin.org/en/swp/about-us/organization/centre-for-applied-turkey-studies-cats>.

the face of strong and sustained opposition from the U.S., Turkey has also turned to lobbyists in an attempt to influence the U.S. response to its purchase of the S-400.<sup>26</sup> Most notably, as Congress sought to compel Turkey to cancel its purchase of the S-400, Turkish foreign principals employed firms to lobby against the removal of Turkey from the F-35 program, the imposition of sanctions on Turkey, and a hold that Congress placed on U.S. arms sales to Turkey.

In the spring of 2019, amid U.S. threats to expel Turkey from the F-35 program and impose sanctions if Turkey accepted the S-400s, Greenberg Traurig subcontractors Capitol Counsel and Venable distributed identical letters to the leadership of the House Armed Services Committee and the Senate Appropriations Committee which attempted to justify the S-400 purchase and argue against the retaliatory measures being considered by the U.S.<sup>27</sup> The letter, which was signed by Turkey's envoy to the U.S., asserts that Turkey would have been unable to purchase a missile defense system from a NATO state in a timely manner and thus the decision to purchase the S-400 system was “not a matter of preference but of necessity.” Though some experts argue that this argument does not hold up to scrutiny,<sup>28</sup> the letter goes on to state that removing Turkey from the F-35 program and imposing sanctions “lacks reasoning” and would harm the United States’ “reliability as a defense partner” as well as “NATO’s overall deterrence capability.” Notably, former Senator Tim Hutchinson (R-AR), once a member of the Armed Services Committee, and former Rep. Albert Wynn (D-MD), who was a member of the Foreign Affairs Committee, both worked for Traurig and lobbied on behalf of Turkey during the lobbying push surrounding the S-400.<sup>29</sup>

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26. Amanda Macias, “Biden Unable to Reach Agreement with Turkey’s Erdogan over Russian Missile System Deal During NATO Summit,” CNBC, June 17, 2021, <https://www.cnbc.com/2021/06/17/us-unable-to-reach-agreement-with-turkey-over-russian-s-400.html>.

27. Capitol Counsel, LLC, “Informational Materials,” U.S. Department of Justice, June 3, 2019, <https://efile.fara.gov/docs/6328-Informational-Materials-20190603-26.pdf>; Venable LLP, “Informational Materials,” U.S. Department of Justice, June 3, 2019, <https://efile.fara.gov/docs/5931-Informational-Materials-20190630-6.pdf>.

28. Max Hoffman, “Responding to Turkey’s Purchase of Russia’s S-400 Missile System,” Center for American Progress, March 21, 2019, <https://www.americanprogress.org/issues/security/reports/2019/03/21/467518/responding-turkeys-purchase-russias-s-400-missile-system/>.

While the U.S. removed Turkey from the F-35 joint strike fighter program in July 2019, Turkey continued to lobby for its readmittance into the program and doubled down on its efforts to lobby against other retaliatory measures.<sup>30</sup> With President Trump refusing to impose sanctions on Turkey as required by the Countering America's Adversaries Through Sanctions Act (CAATSA), members of Congress began using the powers of the legislative branch in an independent effort to punish Turkey for its acquisition of the S-400 system.<sup>31</sup> On August 12th, 2020, Defense News first reported that the leadership of the Senate Foreign Relations Committee and the House Foreign Affairs Committee had discreetly put a hold on all major arms sales to Turkey in an attempt to make Erdogan reverse course on the S-400 purchase.<sup>32</sup>

The Arms Export Control Act (AECA) requires the executive branch to notify Congress of major arms sales being considered by the Administration and offers Congress informal and formal mechanisms to block or modify major arms sales.<sup>33</sup> The informal notification process under the AECA offers the leadership of the Senate Foreign Relations Committee and the House Foreign Affairs Committee the opportunity to raise concerns about specific arms sales being considered by the President and dissuade the State Department from formally moving forward with sales.<sup>34</sup> According to Defense News' August 2020 report, House and Senate committee leadership used this informal process to quietly freeze all major arms sales to Turkey.

In addition to blocking major arms sales to Turkey, the hold prevents Turkish Aerospace Industries, a state-controlled defense company, from acquiring parts necessary to complete a \$1.5 billion helicopter sale to Pakistan.<sup>35</sup> Turkish Aerospace Industries is owned by Turkey's defense procurement agency, the Presidency of Defense Industries (SSB), an agency that has expanded significantly since Erdogan put it under the President's direct control after he

29. Albert Wynn, "Short Form Registration Statement," U.S. Department of Justice, May 20, 2029, <https://efile.fara.gov/docs/5712-Short-Form-20190520-182.pdf>; Tim Hutchinson, "Short Form Registration Statement," U.S. Department of Justice, May 23, 2018, <https://efile.fara.gov/docs/5712-Short-Form-20180523-172.pdf>

30. Aaron Mehta, "Turkey Officially Kicked Out of F-35 Program, Costing US Half a Billion Dollars," Defense News, July 17, 2019, <https://www.defensenews.com/air/2019/07/17/turkey-officially-kicked-out-of-f-35-program/>.

31. Lara Seligman, "U.S. Lawmakers Move to Punish Turkey for Buying Russian Missile System," Foreign Policy, December 10, 2019, <https://foreignpolicy.com/2019/12/10/us-lawmakers-move-punish-turkey-buying-russian-missile-system-s400/>.

32. Valerie Insinna, Joe Gould, and Aaron Mehta, "Congress Has Secretly Blocked US Arms Sales to Turkey For Nearly Two Years," Defense News, August 12, 2020, <https://www.defensenews.com/breaking-news/2020/08/12/congress-has-secretly-blocked-us-arms-sales-to-turkey-for-nearly-two-years/>.

33. Paul K. Kerr, "Arms Sales: Congressional Review Process," Congressional Research Service, May 24, 2021, <https://fas.org/sgp/crs/weapons/RL31675.pdf>.

34. Ibid.

35. Burak Ege Bekdil, "Turkey to Export T129 Helos to Philippines Despite Block on Pakistani Order," Defense News, May 25, 2021, <https://www.defensenews.com/air/2021/05/25/turkey-to-export-t129-helos-to-philippines-despite-block-on-pakistani-order/>

became president.<sup>36</sup>

Shortly after news of the Congressional hold broke, Capitol Counsel and Greenberg Traurig, both lobbying on behalf of Turkish Aerospace, made a flurry of contacts with the apparent aim of ending the hold that jeopardized billions of dollars in sales for their client. The vast majority of these contacts targeted members of Congress and professional staff members serving on the Senate Committee on Foreign Relations and the House Foreign Affairs Committee—the two committees responsible for the hold on arms sales to Turkey.<sup>37</sup>



*Vice President Mike Pence and Secretary of State Mike Pompeo participate in a news conference, 201, Photo via D. Myles Cullen/Flickr*

According to supplemental statements submitted by Capitol Counsel, Towner French, an employee of the firm, made a total of 124 contacts in 2020 “Regarding Sale of Defense Items” with members of Congress, Senate Committee on Foreign Relations and House Foreign Affairs Committee staffers, and Vice President Pence’s Deputy National Security Director. Capitol Counsel made the first two of these contacts for its client Turkish Aerospace on July 22nd and July 24th. Then, on August 13th, the day after Defense News first reported about the discreet congressional hold on arms sales to Turkey, Capitol Counsel contacted Vice President Pence’s Deputy National Security Director “Regarding Sale of Defense Items”, the first of 122 such contacts made in the three months following Defense News’ report. It is worth noting that Towner French, the Capitol Counsel employee who made these contacts, worked in the House for fifteen years and made a donation in September of 2020 to Rep.

36. Ferhat Gurini, “Turkey’s Unpromising Defense Industry,” Carnegie Endowment for International Peace, October 9, 2020, <https://carnegieendowment.org/sada/82936>.

37. Capitol Counsel, LLC, “Supplemental Statement,” U.S. Department of Justice, December 30, 2020, <https://efile.fara.gov/docs/6328-Supplemental-Statement-20201230-10.pdf>



Mike McCaul (R-TX), one of the two members of Congress who has taken responsibility for leading the hold.<sup>38</sup>

Following a similar pattern, Greenberg Traurig made 33 contacts to Congress regarding the “Arms Export Control Act process and potential sales impacting Turkish Aerospace” between August and October of 2020.<sup>39</sup> These contacts were made as part of Greenberg Traurig’s agreement to provide lobbying services to Turkish Aerospace “with regard to executive and legislative review under the Arms Export Control Act by engaging Members of Congress...” It should be noted that Turkish Aerospace’s \$1.5 billion helicopter sale to Pakistan has been blocked through the use of legislative review under the Arms Export Control Act. As being permanently removed from the F-35 program would result in Turkish Aerospace and other Presidency of Defense Industries (SSB) firms losing billions of dollars, it is no surprise that the SSB hired Arnold & Porter in early 2021 to “advise on a strategy for the SSB and Turkish



Hill Air Force Base Lockheed Martin F-35A “Lightning IIs” fly in formation over the Utah Test and Training Range, March 30, 2017. Photo via Robert Sullivan/Flickr

contractors to remain within the Joint Strike Fighter Program” and “undertake a targeted outreach to the U.S. commercial partners and stakeholders within the JSF Program to sound out and understand their interests with regard to SSB’s continued involvement as a strategically and valued partner in the JSF Program.”<sup>40</sup> Venable, a Greenberg Traurig subcontractor,

38. Valerie Insinna, Joe Gould, and Aaron Mehta, “Congress Has Secretly Blocked US Arms Sales to Turkey For Nearly Two Years,” Defense News, August 12, 2020, <https://www.defensenews.com/breaking-news/2020/08/12/congress-has-secretly-blocked-us-arms-sales-to-turkey-for-nearly-two-years/>; Capitol Counsel, LLC, “Supplemental Statement,” U.S. Department of Justice, December 30, 2020, <https://efile.fara.gov/docs/6328-Supplemental-Statement-20201230-10.pdf>; “French, C. Towner - Cozen O’Connor,” Cozen O’Connor, <https://www.cozen.com/people/bios/french-towner>

39. Greenberg Traurig, LLP, “Supplemental Statement,” U.S. Department of Justice, November 30, 2020, <https://efile.fara.gov/docs/5712-Supplemental-Statement-20201130-33.pdf>

40. Anthony Capaccio, “Turkey to Keep Making F-35 Parts into 2022, Pentagon Says,” Bloomberg, June 30, 2020, <https://www.bloomberg.com/news/articles/2020-06-30/turkey-to-keep-making-f-35-parts-through-2022-pentagon-says>; Arnold &

tor lobbying for the Turkish government, also made a number of contacts to members of Congress and professional staffers regarding the S-400 purchase and Turkish arms sales. On June 10, 2020 a Venable employee made separate contacts to a House Foreign Affairs Committee staff member and Rep. Eliot Engel (D-NY), the Chairman of the House Foreign Affairs Committee at the time, regarding “pending Turkish arms sales.”<sup>41</sup> On July 15, 2020, Venable contacted four members of the House Rules Committee to “express concern regarding three amendments to the NDAA pending before the Rules Committee.”<sup>42</sup> Notably, this came days after Rep. Adam Kinzinger (R-IL) introduced an amendment to the NDAA for consideration by the Rules Committee during the week of July 20th that would require the President to enforce CAATSA and impose sanctions on Turkey in response to its acquisition of the S-400 system.<sup>43</sup>

Venable contacted Senator Chris Van Hollen (D-Md.) on October 16th with an “inquiry into letter to Pompeo regarding S-400.”<sup>44</sup> This was likely in reference to a letter Senator Van Hollen and Senator James Lankford (R-Okla.) sent to Secretary of State Mike Pompeo on October 7th that requested information on Turkey’s reported activation of the S-400 and urged Pompeo to impose sanctions on Turkey “as required by law.”<sup>45</sup>

Ultimately, and despite the considerable efforts of Turkey’s lobbyists, Pompeo and the Trump administration agreed with the Senators and imposed sanctions on Turkey in December 2020. And, as recently as July, 2021, the Biden administration has pledged to maintain the sanctions.<sup>46</sup>

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Porter Kaye Scholer LLP, “Exhibit A to Registration Statement,” U.S. Department of Justice, February 16, 2021, <https://efile.fara.gov/docs/1750-Exhibit-AB-20210216-35.pdf>.

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

42. Ibid.

43. “H. Rept. 116-457—Report to accompany H. Res. 1053,” 116th Congress, July 20, 2020, <https://docs.house.gov/billssthisweek/20200720/CRPT-116hrpt457.pdf>.

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

45. Senator Chris Van Hollen, “Van Hollen, Lankford, Make Bipartisan Push for Answers on Turkey’s Reported Use of the S-400 Anti-Aircraft System to Detect F-16s”, October 7, 2020, <https://www.vanhollen.senate.gov/news/press-releases/van-hollen-lankford-make-bipartisan-push-for-answers-on-turkeys-reported-use-of-the-s-400-anti-aircraft-system-to-detect-f-16s>.

46. Jonathan Landay and Arshad Mohammed, “Biden committed to maintaining Turkey sanctions over S-400,” Reuters, July 21, 2021, <https://www.reuters.com/world/middle-east/biden-committed-maintaining-turkey-sanctions-over-s-400-2021-07-21/>

## I Gulen

Erdogan immediately placed blame for the 2016 coup attempt on Fethullah Gulen, an exiled former Erdogan ally who lives at a compound in Pennsylvania.<sup>47</sup> Since 2016, Erdogan and allies have attempted to get Gulen extradited and influence U.S. public opinion about Gulen and the large network of charter schools associated with his movement. According to a 2016 Amsterdam & Partners press release, the Turkish government hired the firm to lead a “global investigation into the activities of the organization led by the Turkish cleric Fethullah Gulen.”<sup>48</sup> When announcing the launch of Amsterdam & Partners’ “investigation”, founding partner Robert Amsterdam asserted that “the activities of the Gulen network, including its penetration of the Turkish judiciary and police, as well as its political lobbying abroad, should concern everyone who cares about the future of democracy in Turkey.”<sup>49</sup> Amsterdam & Partners has been paid \$2.8 million by Turkey since it began working for the Turkish government in late 2015.<sup>50</sup>



*Prime Minister of Turkey, Erdogan arrives at the White House in Washington, May 16, 2013. Photo via Sgt. Laura Buchta/DVIDS*

47. Elisha Fieldstadt, “U.S.-Based Cleric Fethullah Gulen Blamed by Erdogan in Turkey Coup Bid,” NBC News, July 15, 2016, <https://www.nbcnews.com/storyline/turkey-military-coup/who-u-s-based-cleric-fethullah-gulen-blamed-turkey-coup-n610681>.

48. “Republic of Turkey Retains Amsterdam & Partners LLP on Expanding Gulen Investigation into Africa and U.S. Charter Schools,” Amsterdam & Partners LLP, January 26, 2016, <https://amsterdamandpartners.com/republic-of-turkey-retains-amsterdam-partners-llp-on-expanding-gulen-investigation-into-africa-and-u-s-charter-schools/>.

49. Ibid.

50. Aaron Schaffer, “How Turkey’s anti-Gulen lobbyist risks Washington’s ire with Venezuela contract,” Al-Monitor, February 21, 2020, <https://www.al-monitor.com/originals/2020/02/amsterdam-partners-turkey-lobbyist-work-maduro-venezuela.html>.



Amsterdam & Partners has lobbied state legislators and Attorneys General to investigate Gulen-affiliated schools for alleged wrongdoing; published *Empire of Deceit*, a book that alleges major misconduct at the schools and has an accompanying website with a portal to submit whistleblower complaints; placed founding partner Robert Amsterdam in an HBO segment on Gulen-affiliated schools; and even put up a billboard with a picture of Gulen and the words “SCHOOL CHILDREN AT RISK” in the small Pennsylvania town where Gulen lives.<sup>51</sup> In 2020, Amsterdam & Partners contacted Secretary of Education Betsy DeVos and four state Attorneys General to discuss “Waste, fraud, and abuse in certain charter schools in the U.S.”<sup>52</sup>

Despite all these efforts by Turkey’s foreign agents in the U.S., Gulen has not been extradited and continues to live in exile in Eastern Pennsylvania.

## ■ Syria/YPG

Capitol Counsel, working on behalf of the Turkish government, has distributed a number of informational materials aimed at tying the YPG, the primarily Kurdish militia that is part of the Syrian Democratic Forces and has received U.S. support in the fight against ISIS, to the Kurdistan Workers’ Party (PKK), an insurgent group with links to the YPG that Turkey has fought for decades. In late 2019, Capitol Counsel distributed an informational material on behalf of the Turkish government titled “Statements by U.S. Officials and Institutions on the Fact that YPG is PKK” which included quotes from former Secretary of Defense Ashton Carter, Senator Lindsey Graham, and other U.S. officials regarding ties between the YPG and the PKK.<sup>53</sup> Capitol Counsel also distributed informational material in late 2019 that asserted the YPG is the “PKK’s branch in Syria” and “indiscriminately oppresses all ethnic and religious groups” and included a list of Turkey’s objectives in Syria and expectations from the U.S. such as ending its partnership with the YPG.<sup>54</sup>

In addition, some of Capitol Counsel and Mercury Public Affairs’ work on behalf of the Turkish government included distributing press releases from groups known as the Syrian National Coalition and the World Council of Arameans. On October 8, 2019, the day before

51. “Empire of Deceit,” Amsterdam & Partners LLP, <https://empireofdeceit.com/>; “Informational Materials,” U.S. Department of Justice, September 15, 2017, <https://efile.fara.gov/docs/6325-Informational-Materials-20170915-1.pdf>; “VICE News Highlights ‘Turkish Mafia’ Running Gulen Charter School in NY,” U.S. Department of Justice, January 30, 2018, <https://efile.fara.gov/docs/6325-Informational-Materials-20180130-20.pdf>.

52. Amsterdam & Partners LLP, “Supplemental Statement,” U.S. Department of Justice, December 22, 2020, <https://efile.fara.gov/docs/6325-Supplemental-Statement-20201222-10.pdf>

53. “STATEMENTS BY U.S. OFFICIALS AND INSTITUTIONS ON THE FACT THAT YPG IS PKK,” U.S. Department of Justice, October 11, 2019, <https://efile.fara.gov/docs/6328-Informational-Materials-20191011-48.pdf>.

54. “Informational Material,” U.S. Department of Justice, October 11, 2019, <https://efile.fara.gov/docs/6328-Informational-Materials-20191011-49.pdf>.



the Syrian National Army (SNA)—a coalition of Syrian opposition groups supported by Turkey—and the Turkish military launched a ground assault into northern Syria against the SDF. Capitol Counsel distributed a press release from the Syrian National Coalition on behalf of the Turkish government titled “Syrian Coalition Reaffirms Commitment to Fighting Terrorism & Liberating Syria from Tyranny & Terrorist Orgs”.<sup>55</sup> The Syrian National Coalition, which is aligned with the Syrian National Army (formerly the Free Syrian Army) and is supported by Turkey, declared that the SNA “is ready to combat terror in cooperation and joint action with the brothers in Turkey so as to safeguard the national interests of the Syrian people”.<sup>56</sup> According to Amnesty International, while carrying out the October 2019 Turkish—led offensive, the Turkish military and the SNA “displayed a shameful disregard for civilian life, carrying out serious violations and war crimes, including summary killings and unlawful attacks that have killed and injured civilians”.<sup>57</sup>



*U.S. and Turkish Militaries Conduct 15th Independent Coordinated Patrol, 2018. Photo via Sgt. Timothy Koster/DVIDS*

In July 2020, Mercury disseminated a press release from the World Council of Arameans on behalf of the Embassy of Turkey which alleged that “sources from the infamous al-Hol camp in Northeast Syria confirm that the Kurdish forces are releasing ISIS terrorists in return for

55. Mert Ozkan, “Turkey opens ground assault on Syria’s Kurds; U.S. Republicans turn on Trump”, Reuters, October 8, 2019, <https://www.reuters.com/article/us-syria-security-turkey-usa/turkey-opens-ground-assault-on-syrias-kurds-u-s-republicans-turn-on-trump-idUSKBN1WO05Z>; “Syrian Coalition Reaffirms Commitment to Fighting Terrorism & Liberating Syria from Tyranny & Terrorist Orgs”, U.S. Department of Justice, October 11, 2019, <https://efile.fara.gov/docs/6328-Informational-Materials-20191011-51.pdf>.

56. Ibid.

57. “Syria: Damning evidence of war crimes and other violations by Turkish forces and their allies”, Amnesty International, October 18, 2019, <https://www.amnesty.org/en/latest/press-release/2019/10/syria-damning-evidence-of-war-crimes-and-other-violations-by-turkish-forces-and-their-allies/>.

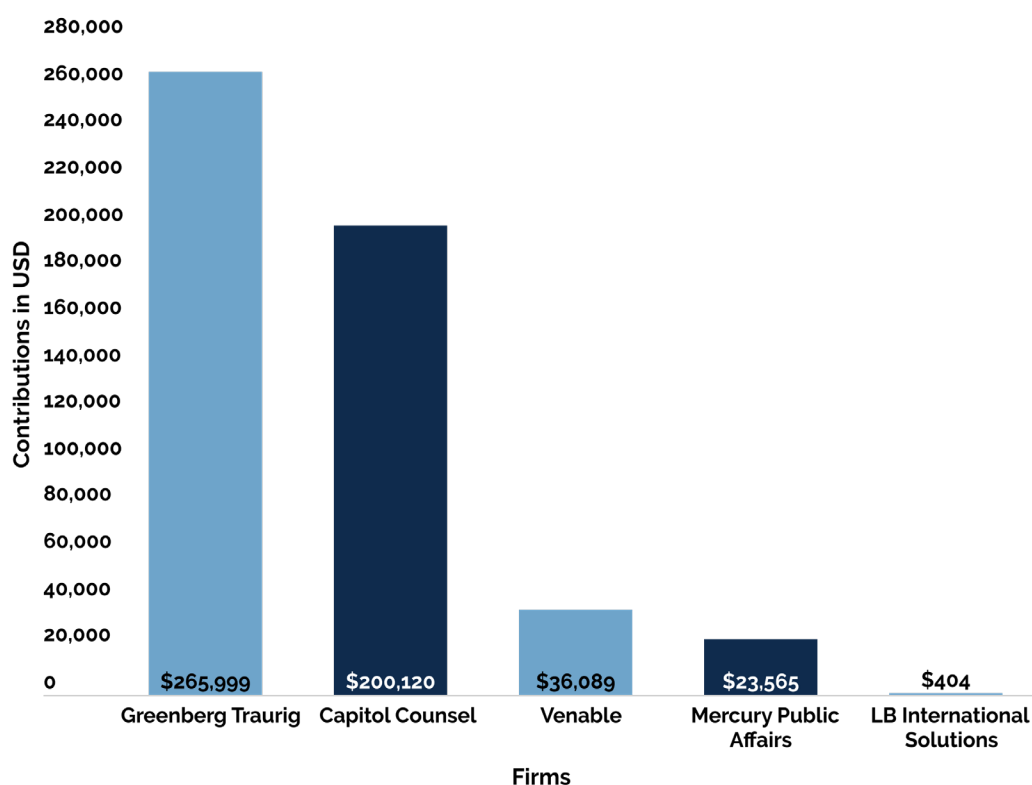
money” and that the “violent and communist PYD/YPG” has negotiated “secret deals with ISIS.”<sup>58</sup>

Mercury disseminated a letter on behalf of the Embassy of Turkey in response to an August 2020 New York Times article titled “Turkish Aggression Is NATO’s ‘Elephant in the Room.’” Signed by Turkey’s ambassador to the U.S., the letter challenged what it referred to as “unfounded accusations” about Turkey’s foreign policy and relationship with NATO, criticized the author’s “bright picture of the PKK/YPG terrorist organization,” and referred to the Treasury Department’s decision to grant a waiver allowing an American company to develop oil fields in northern Syria, which was not mentioned in the Times article, as “financing of terrorism.”<sup>59</sup>

## POLITICAL CONTRIBUTIONS

The Supplemental Statements, from which we tracked all political activities carried out on behalf of foreign principals in Turkey, also require those firms and their registered foreign agents to report any political contributions they make. We recorded all of the contributions that FARA registered firms working for Turkey reported in 2020. Note that, given the six-month reporting periods of Supplemental Statements, some of the contributions that were reported in 2020 actually occurred in 2019 and some of the 2020 contributions were only reported in the first half of 2021.<sup>60</sup>

GRAPH 4: CAMPAIGN CONTRIBUTIONS BY FARA REGISTERED FIRMS REPRESENTING TURKEY



58. “PYD SECURITY RELEASING ISIS PRISONERS IN SYRIA IN EXCHANGE FOR MONEY”, U.S. Department of Justice, August 13, 2020, <https://efile.fara.gov/docs/6170-Informational-Materials-20200713-484.pdf>.

59. “Informational Material”, U.S. Department of Justice, August 10, 2020, <https://efile.fara.gov/docs/6170-Informational-Materials-20200810-543.pdf>

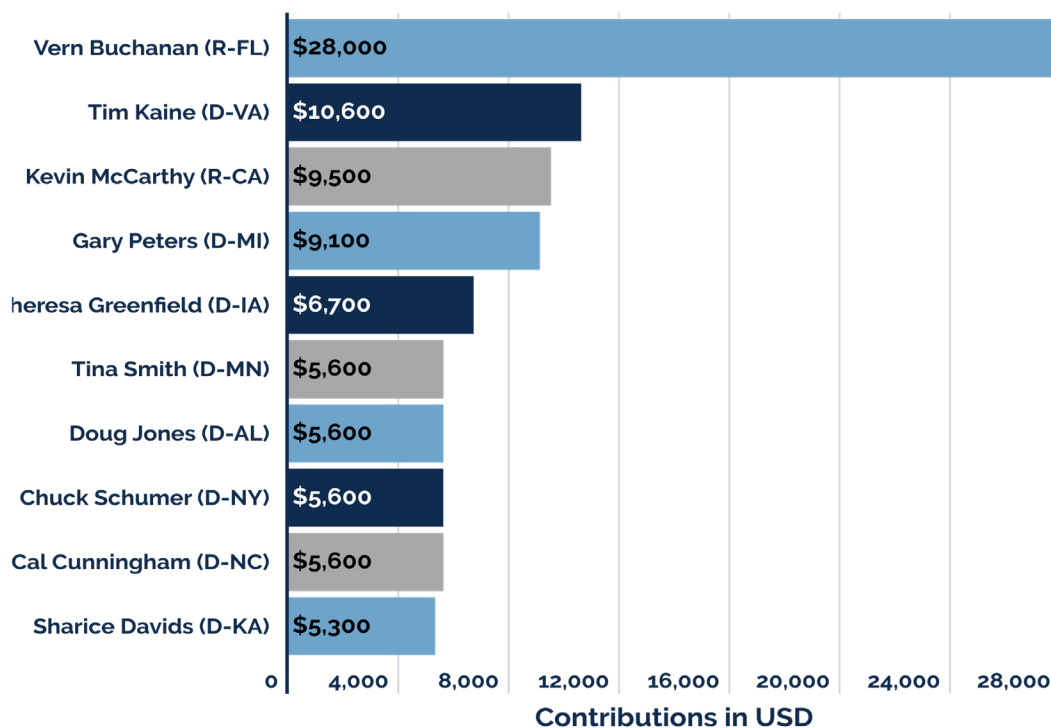
In their 2020 FARA filings, firms representing clients in Turkey reported making 568 campaign contributions, totaling \$526,177. The top donating firms, ranked by the total dollar amount of their donations, are listed in Graph 4.

As Graph 4 shows, the vast majority of campaign contributions from FARA registered firms representing clients in Turkey came from just two firms—Greenberg Traurig and Capitol Counsel. Individual donors at these firms, and the others listed in Graph 4, often donate primarily to one political party, but overall, there doesn't appear to be a strong partisan bias in terms of whom foreign agents working at firms hired by clients in Turkey donate to.

The firms listed in Graph 4 also reported the most political activity on behalf of Turkey in 2020 and, as detailed later in this report, there appears to be a strong correlation between campaign contributions and political activities conducted on behalf of their Turkish clients.

More than a quarter—\$156,495—of all the campaign contributions reported in the 2020 FARA filings of firms representing Turkish clients was given to Political Action Committees (PACs) or party organizations, making it impossible to track this money to individual candidates.

**GRAPH 5: TOP RECIPIENTS OF CAMPAIGN CONTRIBUTIONS FROM FARA REGISTERED FIRMS REPRESENTING TURKEY**



60. It's important to note that this includes contributions from all foreign agents working at these firms, not just those registered to represent clients in Turkey. The reason for this is simply that the value of campaign contributions extends beyond individual donors, and firms can benefit from the contributions of all their lobbyists. For example, a large donor to a specific Member can introduce a lobbyist colleague to that office, even if the latter hasn't donated to that Member.

But, this still leaves just over \$350,000 in campaign donations traceable to individual campaigns. Graph 5 lists the top ten recipients of that money.

Unsurprisingly, some of the top recipients of contributions from firms representing Turkey are party leaders like House Minority Leader Kevin McCarthy (R-CA) and Senate Majority Leader Chuck Schumer (D-NY). These prominent figures are joined in Table 5 by lesser known elected officials like Vern Buchanan (R-FL)—whose 2020 campaign received more money from Turkey’s foreign agents than any other politician—and mixed martial artist turned Representative in the House, Sharice Davids (D-KA).

The list of politicians in Graph 5 is also noteworthy because many of these top recipients of contributions from firms representing Turkey clients were also amongst the most contacted by Turkey’s lobbyists. This is indicative of a larger pattern in deeper analysis of the Turkey lobby: the strong correlation between the politicians they contact on behalf of their Turkish clients and the politicians they donate to.



*U.S. and Turkish Militaries Conduct 15th Independent Coordinated Patrol, 2019. Photo via Sgt. Andrew Goedl/DVIDS*

## CONNECTING POLITICAL ACTIVITIES TO CONTRIBUTIONS

Separately analyzing political activities and campaign contributions made by firms working for Turkey in itself is telling, but connecting the two shows money often flows from firms working for Turkish clients to the Members of Congress whom they’re contacting on behalf of those Turkish clients. In fact, 17 elected officials received nearly \$37,000 in contributions from firms that had contacted their offices on behalf of Turkish clients.<sup>61</sup>

61. For a variety of reasons, this is a conservative estimate for the amount of campaign contributions that went to Members contacted on behalf of Turkish clients. First and foremost, this analysis relies on the self-reporting of campaign contributions and political activities in each firm’s FARA filings. Thus, any contributions or political activities omitted would not be captured here. Second, even if all contacts and contributions are reported, firms vary in how they report them, which can make it challenging to keep the coding of them consistent, and particularly to match a contact of a Members office with



This is just a conservative estimate of the flow of money from firms representing Turkish clients to elected officials whom they contacted on those clients behalf, as it cannot account for donations from these firms to PACs or party organizations that ultimately go to these elected officials. This also only reflects direct campaign contributions made from these foreign agents to Members of Congress and does not reflect other fundraising activities like bundling, which allow lobbyists to solicit contributions for candidates from friends, family, or literally anyone.

Yet, even with these challenges of tracking campaign contributions, it's apparent that Turkey's foreign agents are more likely to donate to offices whom they contact on behalf of their Turkey clients. In some cases the contribution and contact on behalf of Turkey are just days apart. For example, on June 10, 2020 a Venable lobbyist working for Turkey e-mailed the office of Elliott Engel (D-NY) with an, "Inquiry of pending Turkish arms sales," and just five days later, on June 15, 2020, a Venable foreign agent donated \$500 to Engel's campaign.<sup>62</sup> Similarly, just three days after March 9, 2020, when Joe Manchin's (D-WV) scheduler was contacted by a Turkey lobbyist working for Greenberg Traurig, the firm made a \$2,000 contribution to the Senators campaign.<sup>63</sup>

In at least one case, the contribution and contact on behalf of Turkey occurred on exactly the same day. On March 3, 2020 Venable foreign agent and former Member of Congress, Bart Stupak (D-MI), spoke with Senator Jean Shaheen's (D-NH) scheduler to request a meeting with the Senator. That same day Venable reported that one of its foreign agents made a \$1,000 contribution to Shaheen's campaign.<sup>64</sup> Though Stupak called Shaheen's scheduler three days later, on March 6, 2020 there is no record of Stupak, or any Venable lobbyist, meeting or speaking with Senator Shaheen directly.

While some might deem these practices as pay-to-play politics, these contributions are all perfectly legal. Supplemental Statements, where all of the contacts and contributions listed here are self-reported by each of these firms, make it clear that foreign agents are not declaring that these contributions are being made on behalf of Turkey or any other foreign

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a contribution to a Member's campaign. For example, some firms report contacting Lindsey Graham, while others report contacting Senator Graham, and still others report contacting Senator Lindsey Graham. While we maintained rigorous coding standards throughout our analysis and checked for errors in coding extensively, mistakes might still remain and would thus lead to not capturing every single instance where a contribution went to a Member of Congress that was contacted by a Turkey lobbyist at that firm.

62. Venable LLP, "Supplemental Statement," U.S. Department of Justice, December 3, 2020, <https://efile.fara.gov/docs/5931-Supplemental-Statement-20201203-24.pdf>

63. Greenberg Traurig LLP, "Supplemental Statement," U.S. Department of Justice, May 30, 2020, <https://efile.fara.gov/docs/5712-Supplemental-Statement-20200530-32.pdf>

64. Venable LLP, "Supplemental Statement," U.S. Department of State, June 2, 2020, <https://efile.fara.gov/docs/5931-Supplemental-Statement-20200602-23.pdf>

client, but that these contributions are “from your own funds and on your own behalf,”<sup>65</sup> which shields these lobbyists from accusations that they are helping their Turkish clients violate the Federal Election Commission’s prohibition on campaign contributions from foreign nationals.<sup>66</sup>

## CONCLUSION: TURKEY’S INFLUENCE IN AMERICA TODAY

In 2020, the Turkey lobby in America fought a number of major battles and, in nearly every instance, lost. Turkey remains sanctioned as a result of the S-400 purchase. Fethullah Gulen hasn’t been extradited to Turkey and continues to reside in Pennsylvania. And, the U.S. continues to support Kurdish fighters in Syria.



*Istanbul, Turkey, 2014 Photo via Pedro Szekely/Flickr*

This report told the story of these lobbying fights and chronicled the breadth and depth of the Turkey lobby in 2020. Yet, this only covers one part of Turkey’s influence in the U.S. This report, for example, does not address the influence of the Turkish Heritage Organization, a non-profit convener that regularly hosts events providing a platform for Turkish officials in the U.S. Nor does it discuss illicit influence operations, such as the work Michael Flynn did on Turkey’s behalf. This analysis of just one part of Turkey’s influence in America—their FARA registrants—is telling nonetheless.

## FROM THIS RESEARCH WE FOUND:

- 11 organizations were registered under FARA to work on Turkey’s behalf in 2020;

65. This is the precise language of question 15(c) in all FARA Supplemental Statements.

66. “Foreign Nationals,” Federal Election Commission, June 23, 2017, <https://www.fec.gov/updates/foreign-nationals/>.

- Those organizations reported making 2,319 contacts on behalf of their Turkish clients;
- 568 campaign contributions, totaling \$526,177 made by those firms and their registered foreign agents;
- 17 elected officials received nearly \$37,000 in contributions from firms that had contacted their offices on behalf of Turkish clients.
- 1 Senator received a campaign contribution from a firm that had contacted her office on Turkey's behalf that same day.

But, this once sizable influence operation has shrunk markedly in the past year. As previously mentioned, three firms—Greenberg Traurig, Mercury, and Venable—ended their contracts with Turkey's government in late 2020 after they came under fire for Turkey's support of Azerbaijan during the Nagorno-Karabakh conflict. While Capital Counsel continued working for Turkey beyond the fall of 2020, it terminated its contracts with the Turkish government and Turkish Aerospace in early April of 2021.<sup>67</sup>

In 2021, the Biden administration also delivered more rebukes to Turkey and its lobbyists in America. Biden has affirmed his commitment to upholding sanctions against Turkey related to the S-400 purchase and, perhaps even more notably, in April Biden became the first U.S. president to recognize the Armenian genocide,<sup>68</sup> a move which Turkey has been lobbying against for years.

Despite these myriad setbacks, Turkey certainly hasn't relented in its hopes of renewing its influence in America, as there are still ten FARA registrants working on behalf of clients in Turkey as of September 2021. But, given the recent tensions in U.S.-Turkey relations and the inability of Turkey's lobbyists to course-correct, the government of Turkey's influence in America will likely remain marginal, at best.

67. Capitol Counsel LLC, "Supplemental Statement," U.S. Department of State, June 30, 2021, <https://efile.fara.gov/docs/6328-Supplemental-Statement-20210630-11.pdf>

68. "Statement by President Joe Biden on Armenian Remembrance Day", The White House, April 24, 2021, <https://www.whitehouse.gov/briefing-room/statements-releases/2021/04/24/statement-by-president-joe-biden-on-armenian-remembrance-day/>







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