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.

About the Foreign Influence Transparency Initiative

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.

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EXECUTIVE SUMMARY

As one of the United States’ most important allies in Asia, South Korea has strong political, economic, and military ties with the U.S. By the numbers, South Korea is the U.S.’s sixth largest trading partner,\(^1\) and, through the United States Forces Korea (USFK), there are 28,500 U.S. troops stationed in South Korea,\(^2\) which would be the tip-of-the spear in any military conflict with regional adversaries like North Korea or China.

For these, and many more reasons, the government of South Korea has a vested interest in attempting to sway U.S. foreign policy in its favor, and spends tens-of-millions every year on Foreign Agents Registration Act (FARA) registered lobbying and public relations firms. The FARA filings we examined revealed what these firms are doing for a South Korea that seeks to strengthen all of its economic, cultural, political, and military ties with the U.S.

Specifically, the Foreign Influence Transparency Initiative (FITI), a program of the Center for International Policy, analyzed every FARA Supplemental Statement filed in 2019 by firms working on behalf of clients affiliated with South Korea.

The major findings of this report include the following:

- 23 different organizations served as South Korea’s registered foreign agents in the U.S.;
- Reported spending of $31.1 million on FARA registrants working on behalf of South Korea;
- 2,013 political activities carried out on behalf of South Korean interests by those organizations;
- South Korean foreign agents contacted the offices of 309 members of Congress (more than half of all members) and more than a dozen Congressional committees;
- More than 1,500 campaign contributions from those organizations, totaling $1.65 million;
- 94 of those contributions went to 55 different members of Congress that FARA registered firms had contacted on behalf of South Korea;
- 37 cases in which a firm contacted a Congressional office on behalf of South Korea within a month of that firm making a campaign contribution to that specific member of Congress.

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INTRODUCTION

The Foreign Agents Registration Act (FARA) has become a salient talking point as foreign interference has attracted increasing levels of scrutiny in the U.S. This law is meant to increase transparency for the American public so that foreign propaganda and political activities can be spotted and judged accordingly. Historically however, FARA has largely been under-enforced, leaving the public in the dark as to how foreign operations affect U.S. policy or opinions. While China and Russia receive the brunt of the attention for foreign influence activities, the highest spending nations, like South Korea, often fly under the radar. In this report we provide a comprehensive look into the immense number of FARA-registered firms that worked in the U.S. on behalf of South Korean interests in 2019.

As one of the United States’ most important allies in Asia, South Korea has strong political, economic, and military ties with the U.S. South Korea is the U.S.’s sixth largest trading partner3, while the U.S. is South Korea's second largest trading partner, responsible for 12.1%4 of its exports. The two countries have operated under a Free Trade Agreement5 for over a decade and South Korea was notably one of the six countries exempt from the Trump admin-

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administration’s aluminum and steel tariffs\(^6\) that made headlines in 2019. Furthermore, through the United States Forces Korea (USFK), there are 28,500 troops stationed in South Korea.\(^7\)

According to “South Korea’s Defense White Paper,” USFK “operates about 90 combat planes, 40 attack helicopters and about 60 Patriot missile launchers.”\(^8\)

South Korea’s relationship with the U.S. is also marked by regional politics and geopolitical concerns, especially with the rise of China and the constant nuclear threat from North Korea. Central to the U.S.-South Korea alliance is the 1953 Mutual Defense Treaty, which commits the two states to jointly respond to armed attacks on either Party in the Pacific area and allows the U.S. military to station troops in South Korea with Seoul’s approval. South Korea’s cost-sharing contributions to the U.S., pursuant to the Special Measures Agreement (SMA), to support the United States Forces Korea (USFK) in South Korea have been a subject of great controversy under the Trump administration.\(^9\)

Throughout his presidency, President Trump continued to criticize South Korea for paying what he has deemed an unreasonably low amount to the U.S. and at one point even asked South Korea to pay five-fold what it had previously been paying.\(^10\)

With the United States alliance with South Korea, and the United States with Japan, these three nations form a trilateral cooperation to balance against rivals like North Korea and China. The General Security of Military Intelligence Agreement (GSOMIA) is the crux of that-

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8 Ibid.


cooperation, allowing all three nations to share intelligence on North Korea. However, Japan-South Korea relations reached their lowest point in decades in 2019 after tensions erupted due to Japan’s removal of South Korea from Japan’s whitelist trade countries. This fueled a boycott on Japanese goods in South Korea and contributed to ongoing disputes regarding reparations for Japan’s colonization of South Korea and use of Korean women as “comfort women” in the 20th century. The dispute culminated in South Korean President Moon Jae-in condemning Japan’s action in further stymying South Korea’s already slowing economy. South Korean officials stated that they would also remove Japan from South Korea’s whitelist of trade countries without an explanation, and nearly left the GSOMIA agreement. Given the U.S.’ close relationship with both Japan and South Korea, and its vested efforts in developing a trilateral alliance with Japan and South Korea, the U.S. was a natural mediator. Towards the end of 2019, Japan curbed a portion of its trade restrictions on South Korea. However, South Korea’s Trade Minister Sung Yun-mo asserted that it would not fundamentally solve the issue between the two countries. Furthermore, President Moon Jae-in urged Prime Minister Shinzo Abe to retract all the trade restrictions on South Korea at the first summit that was held in 15 months, from the formal summit in September of 2018. At the end of the year meeting, South Korean Finance Minister Hong Nam-ki stated that South Korea will continue to reduce its reliance on Japan until Japan “lifts the curbs.”

The FARA filings examined here, especially those from the latter half of 2019 provide a glimpse into the role that the U.S. played in this dispute between its two close allies, and what South Korea’s lobby did to influence U.S. lawmakers about this issue. More generally, this deep economic and strategic relationship with the U.S. explains why South Korea has such a vested interest in hiring FARA registered lobbying and public relations firms to represent it in the U.S.

The FARA filings we examined reveal a South Korea that seeks to strengthen all of these eco-


economic, political, and military ties with the U.S. The range of their influence activities was immense, including seemingly inconsequential issues at one end--like establishing a presence in the New York fashion scene--and, on the other end, existential issues, like nuclear weapons on the Korean peninsula. Unlike Japan, whose lobby we discussed in a recent report, South Korea presents a seemingly cohesive lobbying front with relatively clear objectives of encouraging trade and leveraging its relationship with the U.S. to affect its relationship with Japan. To this end, most registrants lobbying on their behalf are classic Washington, D.C. K-street lobbying and public relations firms.

To better understand the complex relationship between South Korea and the U.S., and the role that South Korea’s influence in Washington plays in it, the Foreign Influence Transparency Initiative (FITI), a program of the Center for International Policy, analyzed every FARA Supplemental Statement filed in 2019 by firms working on behalf of clients in South Korea. From this analysis we found:

- 23 different organizations served as South Korea’s registered foreign agents in the U.S.;
- Reported spending of $31.3 million on FARA registrants working on behalf of South Korea;
- 2,013 political activities carried out on behalf of South Korean interests by those organizations;
- South Korean foreign agents contacted the offices of 309 members of Congress (more than half of all members) and more than a dozen Congressional committees;
- More than 1,500 campaign contributions from those organizations, totaling $1.65 million;
- 94 of those contributions went to 55 different members of Congress those FARA registered firms had contacted on behalf of South Korea;
- 37 cases in which a firm contacted a Congressional office on behalf of South Korea within a month of that firm making a campaign contribution to that specific member of Congress.

The remainder of the report first focuses on political activities conducted by lobbying firms and South Korea stakeholders toward Congress, the Executive Branch, states, businesses, the media, and think tanks. The report highlights how defense decisions are shaped by South Korea’s U.S. lobbyists, especially regarding U.S. defense activities in the Asia Pacific. The report then looks at political contributions made by these lobbying and public relations firms, with particular focus on the extent to which these contributions go to members of Congress contacted on behalf of South Korea. It then concludes with recommendations for improving the transparency and enforcement of FARA so that the public can be aware of and equipped to assess how the U.S. government is influenced by outside interests.
Supplemental statements cover a six-month reporting period, but firms do not have uniform reporting timelines. As FARA does not have a standard reporting period, these results represent all supplemental statements filed in 2019, but activities and political contributions may have occurred throughout 2018 as well. Likewise, some late 2019 activities were filed in 2020 and are thus not within the scope of this analysis.

POLITICAL ACTIVITIES

Under FARA, all political activities conducted by firms on behalf of South Korean clients must be recorded and reported at regular intervals to the Department of Justice in what are known as Supplemental Statements. The statute has a rather expansive definition of “political activities,” which includes anything that is believed or intended to “influence any agency or official of the government of the U.S. or any section of the public within the U.S. with reference to…the domestic or foreign policies of the U.S. or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.”\(^{17}\) The definition serves to cover a broad swath of influence activities FARA registrants may conduct on behalf of their foreign clients. In addition, other provisions of FARA apply to other types of outreach such as public relations and publicity. These categories also include multiple types of interactions, including in person meetings, phone calls, texts, and emails. Ideally then, the reported activities should give the U.S. government and

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its people awareness as to what objectives foreign governments like South Korea are paying registrants to pursue in America.

Unfortunately, many firms choose to only disclose certain types of communications, or give such sparse details that do not meet the standard required under FARA, i.e. “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.” Despite the limitations, we documented an extraordinarily-active South Korean influence activities during this period, and recorded over 2,000 distinct contacts based on registered 2019 filings.

The Firms

Overall, at least 2,013 political activities were disclosed by the 23 different FARA registered firms representing South Korea. The number of firms and contacts is comparable to what we have identified in previous FITI reports on the Emiratis, Qatars, and Saudis, but trails the extraordinarily large recorded influence of the Japanese lobby. We say, “at least” because, unfortunately, many FARA registered firms are not fully transparent about the work they conduct on behalf of foreign powers. Many of the groups working for South Korea are no exception, as is discussed in greater detail below. Graph 1 shows the top ten firms who reported activities on behalf of South Korean clients. While 23 firms registered as representing South Korea under FARA over the course of 2019, only 15 reported the political activities they conducted on behalf of their foreign principals.

Graph 1: Top Ten Firms in Terms of Activities Reported on Behalf of South Korean Clients in 2019 (in number of contacts disclosed)
The Korea Economic Institute of America (KEI) reported 650 political activities—by far the most of any FARA registrant working for South Korean interests in 2019. KEI describes itself as, “the premier U.S. think tank and public outreach organization solely dedicated to helping Americans understand the breadth and importance of our relations with the Republic of Korea.” KEI is the only FARA registrant working for South Korea that is considered a think tank, and the organization’s reported FARA activities reflect this unique status. Unlike other firms, KEI’s activities were primarily directed at other think tanks (229 activities), universities (136 activities), and other non-profits (93 activities). Unlike the more traditional lobbying firms on the South Korean government’s payroll, who focused heavily on Hill outreach, KEI contacted House and Senate offices just eighteen times in 2019.

Thomas Capitol Partners trailed only KEI in terms of the number of FARA activities performed on behalf of South Korean clients. In its work for both the Embassy of the Republic of Korea and the Korea International Trade Association, the firm reported 376 political activities, all of which were directed at either the House or Senate. Unfortunately, the firm did not provide detailed accounts of these activities and simply listed the names of House, Senate, and Congressional Committees that had been contacted without providing dates or even short descriptions of what was discussed in the interactions. The firm’s founder, Thomas S. Kim, the son of Korean immigrants to the U.S., has by his own account purportedly influenced every congressional and legislative issue affecting the U.S.-Korea alliance in the ten years he and his firm have been registered under FARA.

Nelson Mullins Riley and Scarborough was the third most active FARA registrant for South Korea in 2019. Like Thomas Capitol Partners the firm reached out exclusively to Congress, with 153 of its 215 reported activities being directed at House members and staff, and the other 62 activities focused on the Senate. This Congressional focus is perhaps unsurprising given that two former members of Congress joined the firm in 2019—Trey Gowdy (R-SC) and Jim Moran (D-VA)—though neither were registered under FARA to work on behalf of South Korea.

The remainder of the list of firms in Graph 1 contains lobbying heavyweights—like Squire Patton Boggs and Cornerstone Government Affairs—smaller firms—like DiNino Associates, which represents the Embassy of South Korea through Cornerstone Government Affairs—and organizations focused exclusively on trade issues—like the Korea International Trade Association and the Korea Trade Investment Promotion Agency.

18 “About the Korea Economic Institute (KEI),” Korea Economic Institute, https://keia.org/about/

Congress was, by far, the most likely target of South Korea’s foreign agents, receiving more than half (1,126) of all 2,013 FARA reported contacts in 2019, as shown in Graph 2. South Korea’s FARA registrants also focused considerable attention on intellectual influence, reaching out to think tanks 249 times and universities an additional 138 times. Surprisingly, South Korea devoted relatively little attention to the media, which was contacted just 100 times by South Korea’s registered agents. This stands in sharp contrast to the Saudi, Emirati, Qatari, and Japanese lobbies, whose FARA registrants focus heavily on shaping the media narrative, as documented in previous FITI reports.

The Korea Economic Institute conducted nearly all (229) of South Korea’s outreach to think tanks, contacting dozens of think tanks in D.C., with many of those interactions being with larger think tanks like the Center for Strategic and International Studies (22 contacts), the Brookings Institution (11 contacts), and the Carnegie Endowment for International Peace (10 contacts). A previous FITI report, “Foreign Funding of Think Tanks in America,” found that South Korea was one of the top donors to think tanks, contributing nearly $2 million dollars from 2014-2018. Notably, the Center for Strategic and International Studies was one of the top recipients of that funding.

In addition to think tanks, the Korea Economic Institute was responsible for 136 of the 138 instances of outreach to American colleges and universities reported by South Korea’s FARA registrants in 2019. The Institute ultimately contacted more than 50 colleges and universities in just this one year.

20 Ben Freeman, “Foreign Funding of Think Tanks in America,” The Center for International Policy, January 2020, https://static.wixstatic.com/ugd/3ba8a1_4f06e99f35d4485b801f8dbfe33b6a3f.pdf
DiNino Associates, LLC stands out due to their focused lobbying around a bill in Congress. Their two FARA filings in the 2019 period consisted of 142 contacts, 82 of which contained the description “Request for Cosponsorship” and eight other contacts which contained some description including “Cosponsorship”. In total, DiNino contacted 136 members of Congress, seeking to meet primarily with their legislative staff members. While DiNino does not clarify which bill its activities concerned, a closer look at their contact descriptions reveals mentions of H.R.1762 twice and S.843 once. This is the Partner with Korea Act introduced by Senator Johnny Isakson and Representative Gerry Connolly in the Senate and House, respectively, on March 14, 2019. Representative Connolly was contacted eight times by DiNino, the first of which was a phone call on October 1, 2018 regarding “Cosponsorship Follow-Up” and the last of which was an email on March 18, 2019 regarding a “Hearing Inquiry.”

The Partner with Korea Act aimed to create a special visa for 15,000 South Koreans to work in the U.S. “solely to perform specialty occupation services...” On the day the legislation was introduced, Representative Connolly’s press release said the bill “encourages greater ties between American and Korean businesses” and quoted Connolly declaring that “South Korea is an essential American ally and, as our sixth largest trading partner, an indispensable source of opportunity for American businesses.” Representative Connolly’s status as co-chair of the Congressional Caucus on Korea also explains why he was one of the most contacted Members of Congress.

It is perhaps unsurprising that Cornerstone Government Affairs records similar political contacts on behalf of South Korea. Like DiNino, the description “request for sponsorship” appears 86 times, with all contacts concerning Senate and House members. Eleven other contacts contained descriptions with “cosponsorship” as well. The staff members contacted

tended to be a variation of chiefs of staffs, legislative assistants, and legislative directors. Again, while it is unclear what specific bill Cornerstone was seeking cosponsorship for, the firm does mention “HR 7001” twice, which would suggest that is the bill in question. Why the South Korean Embassy would be concerned with this bill is not immediately apparent, given the lack of a clear description, but H.R. 7001 refers to the World Press Freedom Protection and Reciprocity Act introduced by Representative Christopher Smith, which, amongst other provisions, calls out North Korea for being one of the “countries with the most restrictive media and information environments.”28

Private companies were also a common target of South Korea’s foreign agents in 2019. Not surprisingly, a majority of this outreach to private companies was done by the Korea International Trade Association and the Korea Trade Investment Promotion Agency.

Graph 2: Top Ten Organizations Most Contacted by South Korea’s Foreign Agents (in number of times contacted)

While South Korea’s FARA registrants had a somewhat more diffuse approach to influence than other countries FITI has analyzed, like other countries, their lobbyists were overwhelmingly focused on Congressional influence. The most contacted Congressional offices are listed in Graph 3.

As Graph 3 indicates, Democrats were the most likely targets of South Korea’s lobbyists. Speaker of the House, Nancy Pelosi (D-CA), was the most contacted member of Congress, followed closely by Jim Clyburn (D-SC) and Eliot Engel (D-NY). Though Democrats topped the list in Graph 3, Republicans certainly were not an after-thought for South Korea’s foreign agents, with the offices of Johnny Isakson (R-GA), Rand Paul (R-KY), and David Perdue (R-GA) all contacted at least a dozen times. In all, more than half of all Congressional offices (309) were contacted by South Korea’s foreign agents.
Defense Activities and U.S. Basing

While defense-related political activities did not feature heavily in these FARA filings, these specific contacts provide a glimpse of the military issues that South Korea is most concerned with. The mutual defense treaty, originally signed in 1953, and the presence of American troops on South Korean territory, as mentioned in the introduction, explains why the House Committee on Armed Services was contacted twenty times and James Inhofe, the Chairman of the Senate Armed Services, was contacted eight times.

In 2019, there were roughly 28,500 American troops stationed in South Korea, the third largest presence of U.S. troops in a foreign nation after Japan and Germany. This bilateral military alliance allows the U.S. to project power in Northeast Asia and helps South Korea deter against North Korea. In February 2019, South Korea and the U.S. reached an agreement for South Korea to pay 1.03 trillion won ($890 million) to support U.S. troops on its soil, an increase from 2018’s 960 billion won ($850m) deal. Negotiations for the following year started in November 2019, but continued with the United States originally asking South Korea to pay over 400% more than the previous year at $5 billion.\(^{29}\) Furthermore, former U.S. Secretary of Defense Mark Esper argued that “South Korea is a wealthy country and could and should pay more to help offset the cost of defense.”\(^{30}\) This dispute caused concern that it would create repercussions for the U.S.-South Korea alliance beyond the payment agree-


The Special Measures Agreement (SMA) is not the only aspect that has potential to further complicate the U.S.-South Korea alliance. In 2019, President Moon Jae-in made one of his goals to successfully transfer the Operational Control Authority (OPCON) from United States Forces Korea (USFK) to South Korea. Through OPCON transfer, President Moon wants “to establish national military sovereignty and take greater responsibility for safeguarding South Korea’s national security.” However, similar to SMA, this process yet again proved to be challenging with the two countries not seeing matters eye-to-eye.

Graph 4: Top Ten Congressional Offices and Committees Contacted by Japanese Lobbyists Regarding Defense (in number of times contacted)

In August 2019, Japan announced it was removing Korea from its whitelist (with South Korea retaliating by announcing its intention to terminate the General Security of Military Information Agreement (GSOMIA). Around this same time, Nelson Mullins Riley & Scarborough LLP requested meetings with Senator Lindsay Graham’s staff five times on behalf of their client-

32 Ibid.
the Embassy of the Republic of Korea. Though the FARA description for these contacts only says “meeting requests,” all the requests contacted some variation of Senator Graham’s national security advisor, deputy military legislative assistant, and defense fellow. Notably, Senator Graham also serves on the Senate Appropriations and Foreign Relations Committees. Seoul faced heavy criticism from top U.S. officials upon its announcement of its decision to leave the agreement with the Assistant Secretary of Defense for Indo-Pacific Security Affairs Randall Schriver commenting that “Historical disputes, animosities and political disagreements should be kept separate from shared vital military and security cooperation.” Secretary of Defense Mark Esper even announced that he met with Japanese and South Korean officials to “[urge] them to work it out between them.” In November 2019, on the last day possible for renewal, South Korea announced it was renewing the GSOMIA agreement.

### Transparency Issues

FARA enforcement has long been lenient on accurate and timely reporting by registered firms. As a 2016 DOJ Inspector General’s (IG) audit of FARA found, half of all registrants file Supplemental Statements late, and filing deficiencies run rampant. Even when prompted to remedy these shortcomings, the DOJ IG found that registrants “are often unresponsive to FARA Unit requests to update their information.” In the case of South Korea, some firms offer detailed records of the political activities they conduct on behalf of their clients, while others offer barely anything at all. The firms that offer the most detailed records of their activities list the type of activity they conduct, the date conducted, the individuals involved in the interaction, and a brief description of what the activity was about. Firms that provided all this information included both

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traditional lobbying shops like Nelson Mullins Riley & Scarborough LLP and other associations like Korea International Trade Association.

Inconsistent FARA enforcement and a confusing filing system mean that registrants can both intentionally or accidentally complete FARA filings incorrectly. Florence Lowe-Lee, for instance, states in her FARA filing that she engaged in activities and services for the Korea Atomic Energy Research Institute (KAERI), but none that could be considered political.\(^36\) The dinners at the Foundation for Nuclear Studies with various Congresswomen and programs with titles such as “Nuclear Policy and Politics on the Korean Peninsula” and “CSIS US-ROK Strategic Forum” are just some of her activities that could be considered political, especially considering that the DOJ defines political activities as those that will “influence...any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States...”\(^37\) For the sake of this report, we have recorded all of Lowe-Lee’s activities as political contacts for consistency in our analysis, but the discretion that Lowe-Lee has, coupled with discrepancies in activity categorization, highlights the lack of clarity within FARA. The fact that other registrants like Nelson Mullins Riley & Scarborough LLP record attending think tank events or meetings with congressional staff and representatives as political activities only reinforces how inconsistent FARA entries are.

DiNino Associates LLC stands out as a registrant for recording its contacts with vague descriptions like “request for cosponsorship”, while neglecting to consistently clarify which bill they were discussing.\(^38\) The contact description does mention “H.R.1762” in the description a few times. This fact suggests, but does not confirm, that this is potentially the bill, the Partner With Korea Act, they were soliciting cosponsorship for.

Sachem received $40,000 in fees for conducting activities and services, none of which it reported as being political activities.\(^39\) Pillsbury Winthrop Shawman Pittman, LLP, similarly was paid $175,977 for activities and services, none of which it considered political. Korea National Tourism Organization headquarters paid its New Jersey subsidiary $1,922,434.93\(^40\),\(^41\) and

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37 Ibid.


Los Angeles subsidiary $1,147,549.51\textsuperscript{42,43} which disclosed no political activities. The Korea SMEs and Startups Agency also received $1,392,820, despite disclosing no political activities on behalf of its client, the headquarters of the agency\textsuperscript{44}

“Pillsbury provided legal services to ROK in conjunction with responses to ROK’s questions and requests regarding the new Agreement for Cooperation with the United States Concerning Peaceful Uses of Nuclear Energy, and multilateral/domestic trade related developments,” but “There was no reportable political activity performed on behalf of the Embassy of the Government of the Republic of Korea during this reporting period.”

While some of these firms may have, in fact, not engaged in political activity on behalf of their South Korean clients, it’s hard to imagine that none of them did, particularly given the exorbitant sums of money they were paid. If FARA-registered agents fail to report accurately, fully, and in time while representing close, allied nations, it begs the question of how much is hidden from view when they represent dictators, human rights abusers, and authoritarian regimes.

## Political Contributions

The supplemental statements filed under FARA include political contributions the firms reported in 2019 while actively employed by South Korean principals. Though filed in 2019, because these reports cover six-month reporting periods and FARA does not have a standardized filing schedule, some contributions reported here were made in 2018, and some contributions made by these firms in late 2019 were reported in their 2020 filings.

Within these parameters, the FITI team recorded 1,505 campaign contributions made by firms registered under FARA to represent South Korea in 2019. These contributions went to more than 700 different political campaigns and totaled just over $1.65 million. The top recipients of these campaign contributions are reported in Graph 6.

As Graph 6 indicates, the two parties’ campaign committees were prime targets of donations from firms registered under FARA to represent South Korean principals. The Democratic Senatorial Campaign Committee received $50,500, far more than any other campaign


or committee. Aside from both parties’ campaign committees, the top individual recipients of campaign contributions from South Korea’s FARA registrants was also a bipartisan mix. Senator Lindsey Graham (R-SC) was the top individual recipient of campaign contributions from South Korea’s agents, receiving $22,700. He’s joined on this top ten list by Democratic Senators Ed Markey (D-MA), Chris Coons (D-DE), and Gary Peters (D-MI), and the House Minority Leader, Kevin McCarthy (R-CA).

Graph 5: Top Ten Recipients of Campaign Contributions from Firms Representing South Korea (in total contributions)

Notably, President Donald Trump just missed this top ten list, with his campaign receiving $11,200 from firms representing South Korea in 2019.

Though there were 23 different firms registered under FARA to represent South Korea in 2019, just twelve reported campaign contributions in their FARA filings. The top ten are listed in Graph 6.
Nelson Mullins Riley & Scarborough listed political contributions totaling $528,663 in its 2019 FARA filings—the most of any FARA registered firm representing South Korea and nearly a third of the dollar value of donations from all these firms. The top recipient of funds from the firm was Lindsey Graham who hails from South Carolina, where Nelson Mullins is headquartered. Overall, however, donations from the firm and its foreign agents went to a bipartisan and rather expansive collection of more than 350 different political campaigns.

With $428,630 in total donations reported in their 2019 FARA filings, Squire Patton Boggs trailed only Nelson Mullins amongst all the firms representing South Korea. The top recipients of Squire Patton Boggs’ campaign contributions were both parties’ campaign committees. In fact, the firm was responsible for making all of the donations to the party campaign committees listed in Graph 5. Like Nelson Mullins, Squire Patton Boggs spread its donations far and wide, donating to more than 200 different campaigns.
CONNECTING POLITICAL ACTIVITIES TO CONTRIBUTIONS

Separately analyzing political activities and campaign contributions made by firms working for South Korean principals is telling, but considering these activities together reveals that lobbyists often make campaign contributions to the same members of Congress they contact on behalf of their foreign clients.

“OF THE CONTRIBUTION DOLLARS WE COULD TRACK TO INDIVIDUAL CAMPAIGNS, APPROXIMATELY ONE IN TEN WENT TO MEMBERS OF CONGRESS WHOSE OFFICES HAD BEEN CONTACTED ON BEHALF OF SOUTH KOREA.”

During the time period analyzed here, firms registered under FARA to represent South Korean interests made at least 94 campaign contributions, totaling just over $112,869, to members of Congress they had contacted on behalf of their South Korean clients. In all, 55 members of Congress received campaign contributions from firms, or their lobbyists, that had contacted them on behalf of South Korean clients. Given that South Korea’s foreign agents contacted 309 Congressional offices, this means that more than one-in-six received a campaign contribution from a firm that contacted them on behalf of South Korea.

This is just a conservative estimate of the flow of money from firms representing interests in South Korea to members of Congress they contacted on their foreign clients’ behalf. Of the $1.65 million in campaign contributions we tracked, nearly a third ($501,296) cannot be traced to individual members of Congress, as this money was given to PACs and party organizations like the Democratic Senatorial Campaign Committee and the National Republican Congressional Committee. These organizations could, potentially, then make contributions to members of Congress that meet with South Korea’s foreign agents, but we are unable to attribute those contributions to any of the firms mentioned here. This data also only reflects direct campaign contributions made from these 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 else.

Nonetheless, this conservative estimate of the flow of money from South Korea’s foreign agents to Members of Congress they contacted on behalf of South Korea is significant. For
starters, of the contribution dollars we could track to individual campaigns, approximately one in ten went to members of Congress whose offices had been contacted on behalf of South Korea.

In many cases these contributions and contacts occurred in close proximity to each other. In fact, there were 37 cases in which a firm contacted a Congressional office on behalf of South Korea within a month of that firm making a campaign contribution to that specific member of Congress. For example, Squire Patton Boggs PAC made a $2,000 contribution to Richard Neal’s (D-MA) campaign on February 26, 2019 and just ten days later Squire Patton Boggs agents had a meeting with a member of Neal’s staff to discuss the Partner with Korea Act, according to the firm’s FARA filing. In the case of Thomas S. Kim, founder and sole FARA registrant with Thomas Capitol Partners, he contacted the office of every member of Congress whose campaign he donated to, according to the firm’s FARA filings.

While these are correlations and in no way imply that campaign contributions were the cause or result of contacts on behalf of South Korean interests, the rate at which contacts and contributions align is alarming. It is illegal for any foreign national to make campaign contributions in the U.S. precisely because the foundation of democracy is threatened if members of Congress are paid to act on behalf of foreign powers. However, under current law, it is perfectly legal for foreign powers to hire U.S. lobbyists that can then make contributions to politicians in the U.S., even those that lobby on behalf of a foreign power.

CONCLUSION AND RECOMMENDATIONS

With nearly two dozen firms working on their behalf, the South Korean government and other entities in South Korea attempted to exert outsized influence over U.S. foreign policy in 2019. The contacts conducted in August 2019 and later were especially notable because of the emergence of the trade dispute with Japan and subsequent attempt to leave GSOMIA. While these contacts did not reveal the specific motivations of South Korean officials, they certainly suggest that the events were of great geopolitical importance and that the U.S. played a role in talking to South Korean officials. Other important facets of the South Korean influence operation include its consistent lobbying of dozens of Congress members to cosponsor the Partner with Korea Act. The substantial lobbying that was conducted by firms on behalf of the Embassy of South Korea to persuade Congress members to cosponsor the bill reveal the South Korean government’s desire to develop stronger ties. Finally, the recurrence of trade as a subject in the contacts reinforces how the development of Korean business interests in the U.S., whether it is in the form of energy or beauty products, is central to the health of the Korean economy.

This report has demonstrated the wide net cast by South Korea in the U.S. and includes:

- 23 different organizations served as South Korea’s registered foreign agents in the U.S.;
- Reported spending of $31.1 million on FARA registrants working on behalf of South Korea;
- 2,013 political activities done on behalf of South Korean interests by those organizations;
- Japanese foreign agents contacted the offices of 309 members of Congress (more than half of all members) and more than a dozen Congressional committees;
- More than 1,500 campaign contributions from those organizations, totaling $1.65 million;
- 94 of those contributions went to 55 different members of Congress those FARA registered firms had contacted on behalf of South Korea;
- 37 cases in which a firm contacted a Congressional office on behalf of South Korea within a month of that firm making a campaign contribution to that specific member of Congress.
With the transition from a Trump administration to a Biden administration, it will be as important as ever to keep a watchful eye on South Korea’s lobby in Washington. The U.S.’s foreign policy in Asia and relationship with its allies is likely to shift under a Biden administration. With these changes, South Korea may seek to use lobbying and public relations to engage with this new administration and strengthen its ties to the U.S.

This analysis of South Korea’s registered foreign agents also identified noteworthy deficiencies in FARA filings. Some filings were not transparent, filed late, and generally did not allow for meaningful evaluation of the work being done on behalf of these foreign powers, as the FARA statute requires. Thus, we recommend that the DOJ more fully enforce the provisions of FARA and demand that registrants make complete filings that are submitted on time. We also recommend that Congress give the DOJ the tools it needs to incentive compliance. This includes additional funding for the FARA unit to investigate deficient filings and the authority to impose civil fines for egregious violations of the act by registrants. With these tools DOJ can, hopefully, provide the public with a clearer picture of how foreign powers are wielding influence in the U.S.