

August 6, 2024

Department of Justice/NSD Foreign Agents Registration Act Unit

Submitted via email to: fara.public@usdoj.gov

Dear Foreign Agents Registration Act Unit:

On behalf of Zachor Legal Institute (“Zachor”), a non-profit civil rights organization combating discrimination, the undersigned hereby requests that the Department of Justice, Foreign Agents Registration Act Unit (“FARA Unit”) investigate the matters described below.

Venable LLP (“Venable”) has registered under the Foreign Agents Registration Act (“FARA”) as an agent of the foreign principal the Embassy of the State of Qatar (“Qatar”), registration number 5931.

On June 5, 2024, Venable filed Information Materials (as such term is defined under FARA) titled “State of Qatar: Briefing Pack, June 2024” (the “Materials”) with the FARA Unit. The Materials are available at <https://efile.fara.gov/docs/5931-Informational-Materials-20240605-20.pdf>.

On page 11 of the Materials, at the second bullet point under the heading “K-12 Education”, the following statement appears: “Qatar Foundation International is a grant-making organization that provides financial assistance to K-12 schools that apply for assistance in teaching the Arabic Language. Beyond that, QFI has no role in setting or influencing classroom content or management.”

In May 2024, Zachor submitted a public records request to a number of K-12 institutions in California and obtained records (the “PRA Records”) showing that contrary to the statement made in the Materials, Qatar Foundation International (“QFI”) has had extensive ties in setting and influencing classroom content and management in addition to funding Arabic language classes.

For example, one email in the PRA Records documents that QFI paid for students in California to travel to, and be indoctrinated at, the “House of Palestine”. Based on further research we have done there was no Arabic language instruction at the House of Palestine; rather, students were indoctrinated on Palestinian Arab political matters. The teacher of the class posted a video of the trip on Instagram showing that the trip was not about language instruction and was, instead, a political trip:
https://www.instagram.com/reel/CqAGKUHgufk/?utm_source=ig_web_copy_link.

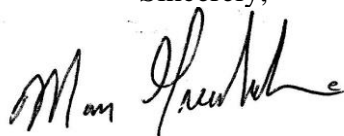
Furthermore, QFI provided a California school district with curricula materials that included modules on Israel and Palestine as well as the U.S. invasion of Iraq. Again, these materials have nothing to do with Arabic language instruction and directly contradict the claim that QFI does not set or influence classroom content. If anything, this proves that QFI is deeply involved in providing classroom content to K-12 institutions.

Moreover, the PRA Records include detailed discussions between representatives of QFI and teachers at a California K-12 institution as to QFI providing materials to be used by the school to comply with California's extremely controversial ethnic studies requirements.¹ Ethnic studies programs do not relate to language instruction in any way and in the case of California, they have been shown to consist of materials best described as propaganda, the very subject that the FARA Unit regulates.²

All of the foregoing demonstrates that the Materials included material omissions and misstatements in violation of 22 U.S.C. § 618 (a)(2).

We therefore ask the FARA Unit to investigate Venable for violations of FARA with regard to the Materials. While we have not included the PRA Records herein we would be happy to provide them to the FARA Unit upon request.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc Greendorfer". The signature is fluid and cursive, with the first name "Marc" written in a larger, more prominent script than the last name "Greendorfer".

Marc Greendorfer
President
Zachor Legal Institute

¹ See <https://www.jns.org/column/ethnic-studies/23/9/1/315400/> (“The point of the curriculum it inspired, even in its revised forms, is not one of inclusion but to indoctrinate all students in the idea of ‘translating historical lessons and critical race theory into direct action for social justice.’ Its purpose is to reinforce a leftist worldview that sees what earlier generations celebrated as the ‘American creed’ of opportunity, meritocracy and liberty as merely a ‘dominant narrative’ that serves white privilege and racism.”)

² See <https://www.washingtonpost.com/education/2019/08/14/critics-slam-draft-california-ethnic-studies-curriculum-far-left-anti-jewish-propaganda/>, <https://www.nas.org/blogs/statement/nas-statement-on-the-university-of-californias-proposed-ethnic-studies-requirement> and <https://www.tabletmag.com/sections/news/articles/california-ethnic-studies-curriculum>.