

LOBBYING IN THE UNITED STATES:  
REPUTATION MANAGEMENT OF  
TURKEY

A thesis Presented by Memnune Alev Pak  
to

The Faculty of Economic, Administrative  
and Social Sciences

in Partial Fulfilment for the Degree of  
Master of Arts in International Relations

Bilkent University

July 1994

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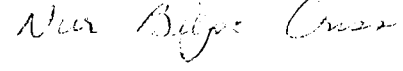
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I certify that I have read this thesis and in my opinion it is fully adequate, in scope and in quality as a thesis for the degree of Master of Arts in International Relations.

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## **Abstract**

The subject of this thesis is the Turkish lobbying mechanism in the United States, with the purpose of evaluating its effectiveness. Lobbying is an integral part of the United States governmental structure, and it is the most commonly used influential instrument. Like many other countries Turkey has been exercising certain lobbying activities in the U.S. since the mid 1970s. These activities take place both on direct and indirect grounds. Therefore this study examines the place and the importance of lobbying in the U.S. government structure, and consequently examine and evaluate the effectiveness of the Turkish lobbying mechanism within the U.S. lobbying system, and see what can be suggested for the future.

## ÖZET

Tezin konusu Amerika'daki Türk Lobi Mekanizmasının etkinliğini ve işlerliğini incelemektir. Lobicilik, Amerikan hükümet sisteminin temel bir ögesi ve toplumları en yaygın etkileme metodudur. Bir çok ülke gibi, Türkiye de, Amerika'da yetmişli yılların ortalarından beri, dolaylı veya dolaysız yollarla lobi faaliyetlerinde bulunmaktadır. Bu çalışmanın amacı lobiciliğin Amerikan hükümet sistemindeki yeri ve önemini incelemek ve Türk lobi mekanizmasının Amerikan lobi sistemi içindeki işlerliğini ve gelecekte başarılı ve etkin olabilmesi için neler önerilebileceğini incelemektir.

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## **Introduction**

Lobbying in U.S. is a part of every citizen's right to influence the government through conducting activities designed at inspiring government policy (1). It is an integral part of the United States political system, and is regarded as the oldest and the most commonly used tool of influence (2).

In 1946, the Federal regulation of Lobbying Act was adopted to set limits and publicize the lobbying activities. Due to certain shortcomings of the act (the law treated lobbyists in varying degrees; Organizations were subject to law only if lobbying was their primary purpose which changed for example I.R.S. (Internal Revenue Service) responsibilities in terms of taxation), certain measures of resignation and reporting were introduced in the 1960s and 1970s (3)(4). However, because of the First Amendment which refers to the freedom of speech, it is very difficult to control and limit the lobbying activities of an organization.

Lobbyists who are commonly public relationists, lawyers, and former Congressmen, exercise two types of lobbying, through either direct contact with the Congress or through grass-roots. These methods are complementary.

Lobbying is not only a system that functions within domestic affairs, but also within foreign affairs. Consequently, it provides a convenient way for foreign countries to pursue their interests within the Congressional arena. Foreign lobbying activities are controlled and limited by the 1938 Foreign Agents Act.

Turkey, within the context of US-Turkish relations, lobbies for two main issues, aid and anti-defamation on a case by case basis. The core of the relation between the two countries is formed by military and economic issues. In addition to aid, Turkey takes a defensive approach against problems caused by its two opponents, namely, Greeks and Armenians, who, contrary to Turks, tend to have an aggressive approach in trying to hamper Turkish interests.

The purpose of this study is to examine the Turkish lobbying activities and try to assess whether they are effective or not within the light of the above mentioned aspects. Therefore, the first chapter examines the place and the importance of domestic and foreign lobbying within the U.S. governmental structure. The second chapter discusses the evolution of the Turkish lobby, accompanied by an inter-ethnic study that will enable a better understanding of Turkish American people. Chapters Three and Four examine the activities of the Turkish lobby, on unofficial and official levels, through an examination of the functions of the unofficial organizations and officially hired companies. In regard to unofficial lobbying organizations, only two associations are dealt with, namely, the Assembly of Turkish American Associations, and the Federation of Turkish American Societies Inc.. They are the most important and the largest ones. Chapter Five, examines and evaluates the efficiency of the activities within the light of the available data. Finally, since the Turkish lobbying system appeared somewhat disorganized, Chapter Six makes certain suggestions for the betterment of the system as a result of this study.

## **Chapter 1. Lobbying and its Historical Background**

Lobbying is the process of influencing public and governmental policy (5). The term derives from 19th century New York politics. Under the Albany Regency - one of the first successful political machines in the U.S., a group of Democratic politicians that controlled the party in New York state, and influenced national and state policies between 1820 and the 1850s (6) (in the late 1820s, it was noticed that men who wished to extract favors, or otherwise to influence state legislators, waited in the lobby of the state Capitol) - since they were not allowed onto the floor itself. This gave rise to all kinds of new words, such as lobbyists forming the lobby or a particular lobby (7). The name lobby-agent, that was used at the time was later shortened by the press, to lobbyist (8).

Lobbying involves the advocacy, either by individuals or by groups of a point of view - the expression of an interest that is affected, actually or potentially, by government action. The term is very broad and vague, both in its meaning and conceptually. While the definitions made by scholars vary, the key word used in all is "interest". The word interest is a vague and a broad word in itself. This vagueness provides a flexible aspect to the term, and while welcomed by some, it is debated by others.

As for lobbyists, they are in an ever expanding profession that enables them to breed fast. Consequently, they now have their own lobbies, such as the American League of Lobbyists that provides them with guidelines for professional conduct.

According to one historical account. "The interaction between government and the governed has been the subject of continuing analysis and controversy since the invention of government itself. Long before, beginning at the tribal level there was government, and where there was government there were politics and lobbying" (9). Lobbying has started before the birth of the American republic, and has been on the scene ever since. Its founding father was Dr. Manasseh Cutler, a lawyer, scientist and clergyman, who in 1787 succeeded to pull off one of the greatest land deals of all times. A group of former army officers, who consolidated as the Ohio Company, hired Cutler to buy them unexplored government land in the West. After intensive lobbying of the leaders of the Continental Congress in New York for eight days, Cutler succeeded not only in convincing the Congress to sell the company 1.5 million acres at a bargain price, he also convinced them to put up another 3.5 million acres for contemplation. In fact, he walked away with such a deal that it "encompassed the future states of Ohio, Indiana, Illinois, Michigan and Wisconsin" (10). In doing so he exhibited the chief skills of the finest lobbyists. Neither the fact that the proceedings were conducted behind doors nor the pledged secrecy of the delegates could stop him. His way of lobbying has been on the arena for more than 200 years. His rules were simple: first, gain access to key legislators and then convince them on the importance of your case, and convince them to pursue it through until the goal is achieved (11).

In short, generations of Americans have been exposed to an invisible government. "From the time of the Yazoo land frauds, in 1880s, when a whole state legislator was bribed and the postmaster general was put on a private payroll as a lobbyist, to the latest logrolling scandals in Congress, Americans have enjoyed denouncing lobbyists. Some truly powerful lobbyists flourished in the last century" (12). For example, the Anti- Saloon League in 1919 succeeded to win passage of a constitutional amendment. This amendment, prohibiting the sale of alcohol, marked the era of prohibition during the Reform period. It is noted to be the most difficult and highest achievement in American politics for that time (13).

### **1.1. The Role of lobbying and lobbyists within the U.S. government system - the Congress**

The authorization for lobbying derives from the First Amendment of the U.S. Constitution, which affirms freedom of speech. Accordingly,

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of people peaceably to assemble, and to petition the government for a redress of grievances (14).

Because of the First Amendment clause and other similar provisions in many state constitutions, laws cannot restrict or limit lobbying (15). Therefore, the Federal Regulation of Lobbying Act of 1946

which lobbies were regulated in the early 1950s. She reported that in 1953, thirty eight states plus the territory of Alaska had provisions for the regulation of lobbying. However, since the definition of what exactly constituted lobbying varied widely, so did these regulations (23).

Because the law on lobbies is so general and unenforceable, the Congress has occasionally considered revising or replacing it, but has never actually done so (24). It can only limit certain activities. So far there are three main obstacles in front of the Congress. First, there is the First Amendment and the constitutional rights it provides, the second is the vague meaning of the terms lobbying and lobbyists. And finally, the increasingly vast number of lobbyists make revising the act a formidable task.

Organizations are subject to the law of the 1946 Act only if lobbying is their principal purpose. Other categories of lobbyists are treated in widely varying degrees by the law. For example, some kinds of lobbying activities are considered by the Internal Revenue Service as tax deductible, others non deductible. Direct lobbying costs such as wages, salaries, fees and commissions of companies are deductible, whereas indirect lobbying expenses, including advocacy, advertising, and grassroots communications are not (25).

However, in the 1960s and 1970s, because of charges of corruption, many of the states introduced lobby registration and reporting requirements (26). The Watergate scandal of 1973-1974 supplied the

states with a major impulse to tighten their public disclosure laws, including requirements of lobby registration. As a result of this, now all fifty states have disclosure laws (27). "Today lobbyists must register in all states with the secretary of state, the clerk of the house or secretary of the Senate, or with a special commission. In all but five states, lobbyists must file reports periodically, and in four-fifths of the states they must report expenditures" (28).

In spite of the fact that the press has a tendency to treat and to refer to lobbyists as if they are a homogenous body, and as if they were cognate in all respects, there are five different lobbyist categories. These five are as follows;

-Contract lobbyists are those who work on contract for an interest group. These are the so called hired guns of the lobbying business and the ones who get the most attention from the mass media.

-In House lobbyists are those who, as part or of all of their job represent their employer to the government.

-The third group is government legislative liaisons, who represent their government or government agency to the legislative and executive branches of the government.

-Then there are citizen or volunteer lobbyists. These are usually unpaid and represent citizens and community groups.



-Finally, private individual or self styled lobbyists simply represent themselves (29).

Besides the above mentioned categorization, a broader categorization can be made such as lawyer lobbyists, public relations lobbyists, and former members of the Congress. These are the lobbyists to whom most common references are made. Therefore, it is best to dwell briefly upon them.

*Lawyer Lobbyist:* In spite of the fact that legal training for lobbyists is not a prerequisite, due to the complexity and specialization of legislation held in the Congress, the need for legal experts has increased. Therefore, hundreds of law firms and private attorneys, specialized in one or another field which affect interest groups are now becoming involved with the political process (30).

According to one scholar, only a lawyer can successfully explain issues such as the need for a bill and the meaning of a section, and show how changing a law can meet the need. Although only few of them have a deep understanding of the legislative process, a lawyer who also has cultivated a professional lobbyist's skill would make an outstanding combination (31).

*Public Relations Lobbyists:* It is true that knowledge of the law is important, yet issues like packaging, marketing and selling are more important in the lobbying process. Thus, many public relations firms, whose members are trained especially to work with the public, and who

know how to influence people are in the lobbying profession. Since it is important to be able to make use of public relations skills in the Congressional arena, a public relations lobbyist who is an expert in the art of persuasion can be very effective (32).

*Former Members of Congress:* An increasing number of former Senators and former House members have also become lobbyists. Besides being very knowledgeable about the legislative process, they have advantages that other lobbyists do not. They know how to pitch their appeals, showing an awareness of members' districts and their political makeup. In addition, they also have access to places like the floor of the House or Senate, members' gymnasium, and the dining room. Such privileges help them maintain their status within Congressional fraternity and obtain favors for their clients. This kind of access, of course, does not guarantee success, but it can be extremely helpful, for most incumbent members of the Congress are sympathetic to requests of former colleagues. The former agency and White House personnel also have the same advantage (33). However, they do not all necessarily become successful lobbyists as some burn their political bridges while members and are not welcomed by former colleagues (34).

The above mentioned groups of lobbyists have their advantages and disadvantages, thus the best solution for the person/group would be to hire a representative from each. A more important fact probably is not the categorization of lobbyists, but rather their access rate and credibility. According to scholars both are very important elements of lobbying, since,

A pervasive factor in every lobbying campaign is access not only to members of Congress, but also to the many doors of government, to the media, to the confidence of other lobbyists and information. The lobbyist who has the access has the best opportunity to wield the most information (35).

With the constant growth of government, issues are becoming more complex. Hence, Congressmen are required to vote on hundreds of issues each year, and it is impossible for them to be fully informed about all of them. Therefore, since lobbying involves the collection and communication of useful technical and political information, the overburdened members and their staffs have to rely and depend more and more on outside expertise, that is, lobbyists to provide them with adequate information. The Congressional committee hearings generally consist of professional lobbyists' testimonies (36)(37).

## **1.2. Lobbying Strategies and Techniques**

"Strategies and implementing lobbying techniques are designed to concentrate the political influence required to achieve a desired legislative objective" (38). In order to accomplish this end, lobbyists work through friends and allies in the Congress, supporting them with various kinds of assistance. This encourages them to take on projects they were already inclined to pursue by making it easier and cost efficient. Congressional members find lobbying to be basically helpful and benign (39).

All successful lobbyists, when in action tend to follow more or less the same pattern. A prototype of this pattern, set forth by Earnest Wittenberg, the author of the book How to Win in Washington; prescribes that every winning lobbyist should do the following (40):

- *Define the Issue.* To be able to get on to the agenda the goals of the lobbyist should not only be clearly stated, but also logically presented.

Example : Issues may cover topics ranging from economic aid, arms aid, foreign aid to domestic issues like farmers rights, abortion rights and environment protection.

- *Research the issue.* The lobbyist should collect more facts than required. The chances of an issue that is of no one's interest to win are more than those that are of interest. If it is of any interest then the lobbyist is likely to gain the first opponent or ally.

Example : At the time of 1975 arms embargo to Turkey, to be able to justify the use of U.S. weapons and military equipment, Turkish lobbyists made research on the mis-use of U.S. arms in similar countries in similar cases (Israel). With the embargo Greece gained its first opponent Turkey and its first ally Armenians.

- *Recruit allies.* The more supporters found the better. Hence, the lobbyist should try to find as many as possible, and then some more. The supporters can vary from the voters to the members of Congress.

Example : Greece has established a permanent coalition with American Armenians that enables both parties to support each other when in need. Their goal has been to influence members of Congress through the help of a larger voters domain to gain their support.

· *Find a Congressional sponsor.* An issue may be in the hands of Congressmen, but nothing important may happen, unless one of them becomes interested and decides to make a commitment.

Example : Congressman Stephan Solarz (Republican New York) is one of Turkey's congressional supporters who is committed to issues regarding Turkey. He was among the key names who supported Turkey in the ban of Armenian resolution 192 .

· *Raise the visibility of the issue.* What the voters have to say about a proposal has great weight, for the support of the Congressman largely depends on them. The lobbyist should find a way to the media, because the best way of getting to the voters is the media.

Example : The American Hellenic Institute in coalition with Australian Hellenic Council, has recently publicized an article inviting all the Greek and Cypriot communities to support their activities concerning Cyprus (July 1994). Articles have appeared both in newspapers in the U.S. and Australia.

· *Support the issue in public hearings.* The lobbyist should find adequate witnesses that will inform the decision committee and

subcommittee, and convince them on the need and the practicality of the project, for the fate of the project will depend on that.

Example : Hill and Knowlton referred to a Kuwait citizen, at the time of the Gulf crisis, to testify in the Congress which was effective on the decision of the Gulf War.

· *Monitor the issue tenaciously right through the legislative process.*  
The lobbyist should follow the case firmly all through the entire process, and be consistent with and supportive of his/her Congressional sponsor throughout the process.

All the above activities have to be monitored effectively for the lobbying campaigns to be successful.

To be able to apply these strategies the lobbyist requires an effective technique. There are mainly two ways of implementing them, i.e. direct or indirect lobbying. Direct lobbying is personal contact with policy makers by the lobbyist, while indirect lobbying is mobilizing grassroots support or working through the court system or influencing elections to public office. Grass root lobbying is a technique used with indirect lobbying. It is done through letters, mailgrams, telephone calls and personal contacts, to build up awareness and public pressure to influence the concerned bodies (41). (Figure 1 illustrates a number of ways in which direct and indirect pressure are applied to the Congress and their percentage of use.)

The term direct lobbying is used commonly to describe the traditional form of personal persuasion (42). Lobbyists who use this approach, providing in-depth information and giving testimonies at Congressional levels, continue to meet both with members of Congress and their staff (43).

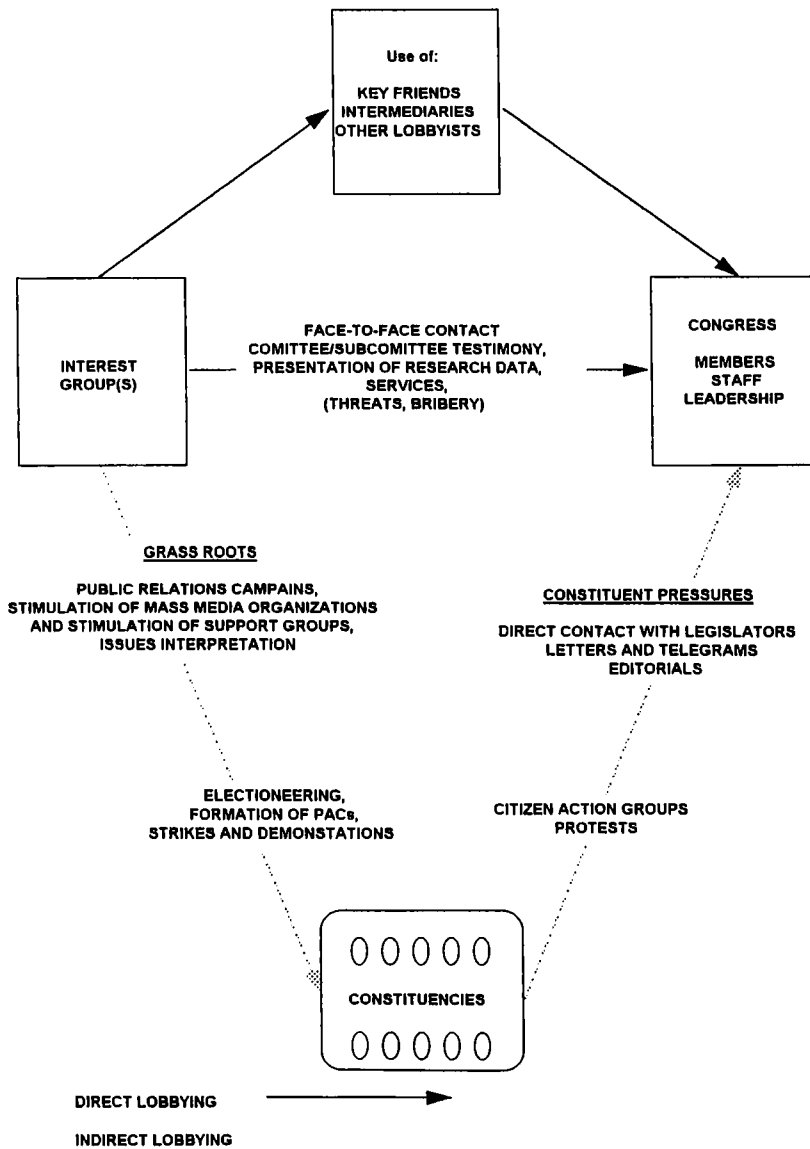
Indirect lobbying involves such activities as public letter writing, telegram campaigns or public advertising in the media. Although indirect tactics are costly and more time consuming, compared to direct contact, they are more difficult, but their ultimate effects are more permanent (44).

The techniques used in direct and indirect lobbying are variable and many. Table 1 shows a variety of techniques that fulfill the requirements of Wittenberg's prescription of a successful lobbying strategy. The percentages shown in Table 1 indicate the truth and the effectiveness of techniques used to implement a good strategy for they indicate personal choices of lobbying organizations.

Techniques associated with steps shown in Wittenberg's strategy model are :

- Research the Issue : 4,
- Recruit Allies : 3, 6, 19, 20, 23,
- Find a Congressional Sponsor : 2, 3, 12, 17, 19, 20,
- Raise the visibility of the issue : 5, 8, 11, 13,14, 18, 24, 27
- Support the issue in public hearings : 1,
- Monitor the issue : 9, 10, 15, 16

Figure I



Source: H.C. Mahhod. Interest Group Politics in America. New Jersey: Prentice Hall Inc. (1990). p. 63



Table 1

PERCENTAGE OF ORGANIZATIONS USING EACH TECHNIQUE OF EXERCISING INFLUENCE	
1. Testifying at hearings	99%
2. Contacting government officials directly to present your point of view	98
3. Engaging in informal contacts with officials- at conventions, over lunch and so on	95
4. Presenting research results or technical information	92
5. Sending letters to members of your organization to inform them of your activities	92
6. Entering into coalitions with other organizations	90
7. Attempting to shape the implementation of policies	89
8. Talking with people from the press and the media	86
9. Consulting with government officials to plan legislative strategy	85
10. Helping to draft legislation	85
11. Inspiring letter writing or telegram campaigns	84
12. Shaping the government's agenda by raising new issues and calling attention to previously ignored problems	84
13. Mounting grass-roots lobbying efforts	80
14. Having influential constituents contact their congressional representative's office	80
15. Helping draft regulations, rules or guidelines	78
16. Serving on advisory commissions and boards	76
17. Alerting congressional representatives to the effects of a bill on their districts	75
18. Filing suit or otherwise engaging in litigation	72
19. Making financial contributions to electoral campaigns	58
20. Doing favors for officials who need assistance	56
21. Attempting to influence appointments for public office	53
22. Publicizing candidates' voting records	44
23. Engaging in direct mail fund raising for organization	44
24. Running advertisements in the media about your position on issues	31
25. Contributing work of personnel to electoral campaigns	24
26. Making public endorsement of candidates for office	22
27. Engaging in protest or demonstrations	20

Source: Thomas, Dye. et al. American Politics in the Media Age.  
 California: Brooks/Cole Publishing Company. (1992). p. 190.

So one can conclude that every step of the strategy involves various techniques to apply on the basis of personal choice and resources.

### **1.3. Foreign Lobby:**

For governments, lobbying is an important tool of foreign policy. In fact, "between the sovereign powers, it is sometimes difficult to tell where diplomacy ends and lobbying begins" (45). Foreign lobby is a growing industry, and today there are more than 900 firms lobbying on behalf of a foreign country in the United States (46). The lobby network is a highly developed industry both in numbers and cash income. In the 1970s, the number of people engaged in the activity in Washington, D.C. was said to be at a minimum of 15,000. In 1975, over 600 groups had registered with the Justice Department under FARA. (Foreign Registration Act) (47).

Their activities have increased, mainly because the United States is an important part of the global economy and what happens in the nation's capital, what emanates from the executive branch and the U.S. Congress often significantly affects world markets. Therefore, there is the need for foreign countries to monitor U.S. legislation and regulation, and lobby with the people in the government and Congress, whose decisions affect foreign corporations and foreign countries (48). Secondly, according to Wendy Ross, a USIA Congressional Affairs writer, with the demise of the Soviet Union, the U.S. is becoming more and more important to many countries, so much so that even many small countries that were once adversaries now want to establish a rapport with the U.S. government. Consequently, to be able to understand the way the Congress and regulatory agencies work, it is necessary for them to hire a lobbyist (49). These are the so called lobby agents, comprising anyone

that is engaged in political, legal, legislative, fund raising or information activities for a foreign principal- government, organization or even an individual (50). Consequently,

A growing number of American lobbyists are registered, as foreign agents for various interests in South Korea, France, Mexico, Saudi Arabia, and Canada, to name a few. Even third world insurgency groups such as the Islamic unity of Afghanistan Mujahideen, have also hired lobbyists in Washington. Japan is in a category by itself, with 122 organizations listed as having registered foreign agents (51).

In fact, the rise of intergovernmental lobby has increased the employment prospects of former U.S. government officials (52). This is mainly because as in domestic lobbying, the interest group needs someone who can pursue its objectives, through access. In fact, they are likely to make use of all three categories of lobbying, but any public relations firm can publicize their side of the story. However, that alone is not sufficient.

If a leading person from a foreign country is to pay an official visit to the United States, that country is likely to hire a firm for a certain period of time to prepare the media, spread the word that s/he is actually coming, and make the logistical arrangements needed in Washington D.C. for the actual arrival (53). Logistical arrangements are very important for the success of the visit. Since official visits are made within a limited time, to

be able to make the best of the visit everything should be organized beforehand, all necessary contacts should be in order.

In 1938, believing that the people who lobby on behalf of foreign interests should be identified, particularly if they were to be paid, the Congress adopted the Foreign Agents Act, FARA (Appendix B) (54). The act was originally adopted to keep watch on the Nazis and other subversive groups, yet the focus of the law has changed since then (55).

In 1966 the Congress revised the law, by placing primary emphasis on the protection of the integrity of U.S. government's decision making process and the right of the people to identify foreign political propaganda sources (56).

Under the current law, a person must file with the Justice department as a foreign agent if he acts under the request or control of a foreign principal as an agent, employee or servant, and engages in at least one of four specified types of activities. These activities include; political activity in the United States on behalf of the foreign principal; public relations counsel, publicity agent political consultant for the principal; collecting or disbursing contributions, loans, money or items of value in the United States for the foreign principal; and representing the foreign principal before any U.S. agency or official (57).

However, due to the narrow scope of the original law, many lobbyists do not register under FARA; the key factor of the law is

payment, yet many foreign policy lobbyists are not paid from foreign funds, they can be self funded, that is to say genuinely or theoretically they earn no income from lobbying, hence, they are legally free of control. In other words if a foreign entity prefers to conduct its lobbying activities free of control, all it has to do is to find a lobbyist that will form a tax exempt institution, and yet still conduct lobbying activities.

This can be done best, through one's ethnic group in America, such as the American Hellenic Institute, a Greek American tax exempt institution, whose primary focus is to lobby in an anti-Turkish vein, and which received unofficially foreign money from Greeks all around the world (58) (This is illegal, because if an institution is to receive foreign money for the purpose of lobbying, then under U.S. law it has to register under FARA). Further, one of the major issues of foreign lobby can be an ethnic question. Confronted with foreign issues, one must bear in mind the aspect of ethnicity.

Ethnic lobbying may be considered as part of foreign lobby. In fact, in many cases ethnic American organizations are regarded as little more than an extension of foreign governments (59). In spite of the fact that all ethnic lobbyists would insist that they put the interests of America first, ethnic lobbying creates the problem of dual loyalties (60). In respect to critical foreign policy issues there is an evident ambiguity about loyalty. As former President of the U.S. Theodore Roosevelt said, "when two flags are hoisted on the same pole, one is always hoisted undermost" (61). For example, the Greek American sentiments can be seen as pro-Greek

rather than pro-American. In other words, the issue they pursue may not be to the benefit of United States' foreign policy - for example an arms embargo on Turkey was not in the best interest of the government - but nevertheless, they pursued the case in 1974 and are still ever ready to bring the issue up at every opportunity.

Foreign lobby mainly operates in the shadows and the American indifference to world affairs is the principle focus of the foreign lobbyist. This is mainly because foreign policy is a field which concerns issues on which many Americans have only little or no serious opinion at all. Many successful lobbyists represent minority opinions and enforce policy making decisions that are for Americans something which they either oppose or to which they are indifferent (62). The major issues dealt within the context of foreign lobbying, the issues they pursue are not necessarily a priority for the public. Countries that are engaged in the lobbying activity tend to have two common concerns, foreign aid and arms sales on the one hand, economic relations on the other.

When foreign aid and arms sales are on the agenda, the lobbying process operates in a similar way for both. First, the agent lobbies the executive branch which means to try to encourage the case in the Pentagon and State Department. This accomplishes the next step which is to prevent the Congress from passing a resolution of disapproval (63).

A foreign agent could legitimately influence the legislative process in two ways - by calling attention to the impact of U.S. Legislation on his

client country and therefore on U.S. relations within and by pointing out groups in U.S. that have identical legislative interests as the foreign country - for instance importers and their employees (64).

Following the above mentioned procedure the aim for a country in question is to pass a beneficial deal with respect to aid. This task might not be a difficult one when an opposing party is absent. However, when rival lobby groups are present, they may end up imposing, something like the 10 to 7 ratio in military aid to Greece and Turkey, which indicates that every time Turkey receives military aid, Greece is also to receive military aid according to the ratio set forth. The 10 to 7 ratio is doubtlessly the outcome of an effective Greek lobby. Because of its claims of a Turkish threat Greece demanded a security guarantee, that would establish a so called balance in the region. The ratio set accordingly is arbitrary, and in fact, does not provide a balance, but instead forms an imbalance in Greece's favor (65)(66): since the two countries are not equal in terms of either population or size their needs can not be equal. First Turkey, compared to Greece, is highly populated, and has a larger military force both domestically and within NATO, and thus needs more defense equipment. Second, Turkey has one of the largest forces in NATO. Third, Turkey is strategically located in a more dangerous environment. From time to time Turkey has had certain disputes with its neighbours, and its arms and military force can be viewed as an element of deterrence. Therefore it is essential that Turkey should be sensitive to every move that may affect its security, as well as its prestige.

## Chapter 2. The Turkish Lobby

As mentioned in the previous chapter, for many foreign countries, the important issues concerning them in their relations with the United States, are foreign economic aid and arms sales. This is not different for Turkey. For decades, the U.S. has been supplying Turkey with both. Being allies, arms sales and aid, especially military aid has been the core element of this relationship within the framework of the NATO alliance.

However, both Turkey and the Turkish Americans living in the U.S. have two adversaries that mainly oppose Turkey's requirements, these namely, the Armenians and Greeks. There are certain issues that upset U.S.-Turkish relations, which evolve through the powerful Greek lobby. These are mainly the 7/10 ratio, the disputes over the Aegean sea- the illegal militarization<sup>1</sup> of the eastern Greek islands, and Greece's attempts to expand its territorial waters from 6 miles to 12 miles-, and finally the concept of "Enosis" which denotes the union of Cyprus with Greece. Because of these debates, the Greeks are a potential threat (67).

The Armenian lobby is another factor that upsets U.S.-Turkish relations, due to the Armenian attempts to secure a resolution for the

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<sup>1</sup>According to Article 13 of 1923 Lausanne Peace Treaty, Greece has military restrictions over the Islands of Mitylene, Kios, Samos and Nikaria. The restrictions are :

1. No naval base and no fortification will be established in the said islands.
2. Greek military aircraft will be forbidden to fly over the territory of the Anatolian coast. Reciprocally, the Turkish Government will forbid their military aircraft to fly over the said islands.
3. The Greek Military Forces in the said islands will be limited to the normal contingent called for military service, which can be trained on the spot, as well as to a force of gendarmerie and police in proportion to the force of gendarmerie and police existing in the whole of the Greek territory.



ongoing story of genocide, i.e. the massacre of Armenians during World War I, (1915). The issue is raised at every possible opportunity.

These two rivalries in a way have led to the increase of Turkish lobbying activities. For the Turkish people the main concern is not only aid from the U.S., but also a constant struggle to defend itself against accusations made by both parties.

### **2.1. The Cyprus Issue and the Arms Embargo**

The 1974 Cyprus crisis and the following arms embargo on Turkey are very important for certain reasons. The crisis can be considered a turning point for the Turkish lobby, because it became more active, and secondly, these issues gave rise to a powerful anti Turkish Greek lobby, which is still effective today. Thirdly, it activated the Armenians, giving them a perfect timing to pursue their cause. Lastly it provides a perfect example of how effective lobbying in U.S. politics - in this case, ethnic lobbies - can be.

Since the Truman doctrine of 1947, which extended U.S. military and economic assistance to both Turkey and Greece, the relations of the two countries, Turkey and United States have been close and friendly. The ties were strengthened in 1952 when Turkey entered NATO. Nevertheless, in 1975 the relations deteriorated, when due to the pressure of the Greek lobby, the United States, despite its own interests imposed an embargo to Turkey. The administration did not favor the embargo, which was lifted in 1978, mainly because such an embargo

would strain the relations between the two countries. The arms embargo was not within U.S. interest for two reasons, first the listening posts in Turkey which were closed in reaction to the embargo, were important for the United States for Israel's security of its most favored ally, Israel. In fact both the Israeli Embassy and American Israel Public Affairs Committee (AIPAC) were quietly lobbying against the ban, for the closure of the posts would compromise Israel's defense system. Secondly, such a ban would provoke certain Turkish groups that were against the alliance and "Western imperialism", to press the Turkish government to get closer to the Soviet Union. Unlike the 1960s Turkey did not feel very much threatened by either communism nor S.U. in the late 1970s. with the 1977 economic agreement, the S.U. provided a \$1.2 billion loan to Turkey (68).

The embargo was a consequence of events that began with the Greek Cypriot military coup in Cyprus against President Makarios, bringing Nicos Sampson to power. The aim behind the coup was to unite Cyprus politically with Greece (Enosis). In response, the Turkish government sent its military forces into Cyprus. Turkish intervention was based on the 1960 Treaty of Guarantee of Cyprus' Independence. At the time of the incidence, Turkey required of the other gurantators, namely, Greece and Great Britain to intervene together with Turkey. However, because the consultations held during the conference in London proved fruitless, the Turkish government acted to intervene on a unilateral basis (69).

The subsequent U.S. embargo was justified on the basis of Turkey's violations of the foreign military sales act, which restricted the use of U.S. military weapons (70). This was in spite of the fact that Turkey was not the only party violating the act; Israel was using U.S. arms constantly against Arabs. In fact, it was retorted that the Greek Cypriot forces had also used U.S. weapons in Cyprus which were presumably provided by Greece. As a consequence of the embargo Turkey closed 26 U.S. bases and listening posts on its soil (71).

On the wake of the crisis, soon after Turkey's intervention, Greek Americans formed the American Hellenic Institute, to which the whole success of the embargo and the prevention of the U.S. Administration's attempts to repeal the ban are attributed. The Greek lobby was not only successful on the direct level, but made perfect use of grass root lobbying. A tremendous pressure was implemented on Congressmen, and thousands of telephone calls and letters were sent to them. The activity held on behalf of the organization was profound, and they went so far as to condemn the ones who were against the ban during Sunday Church services (72).

As for Turkish lobbying activities held against the ban, it "did no attempt to compete seriously with the Greek lobby onslaught" (73). The Turks first approached Inter public, a conglomerate which includes MC Cann- Ericson, four other advertising agencies and a public relations firm, Infoplan. Then they also hired Manning, Selvage, and Lee, a public

relations firm to do a multimedia and Congressional program, and the firm, in turn, hired a Washington law firm McNutt, Dudley, Eastword, and Losch to handle political lobbying. At the grass roots level, compared to 3 million Greeks, 450,000 Turks did not stand much of a chance. However due to the embargo in 1975, the Federation of Turkish American Associations suddenly became very active, engaging in social events, inviting their Congressmen to dinners and other activities. Moreover, a Turkish Cypriot lobby under Nail Atalay, registered under FARA (74).

For the first time, it became very clear that there was a well organized move against the Turkish community, that there were many false statements, as well as deliberately biased information that eventually stirred Turkish Americans (75). Nevertheless, it was not until the embargo act was passed, when they became aware of the fact that they had to do something.

Finally, another important consequence of the issue was that it activated the Armenians. It provided an opportunity for them not only to form a coalition with the Greek lobby, but also gave them an opportunity to bring on the agenda the issue of Armenians. A joint resolution on the "genocide of the Armenians" was introduced the day a new arms ban for Turkey was voted for in 1975. The motion of the resolution was to mark April 24, as a "National Day of Remembrance of Man's Inhumanity to Man". Its wording commemorated " all victims of genocide, especially those of Armenian ancestry who succumbed to the genocide perpetrated

in Turkey in 1915, and in whose memory this day is commemorated by all Americans and their friends throughout the world" (76).

The problems caused by the two groups, Greeks and Armenians, activated the Turks, and marked the beginning of Turkish lobbying activities in United States. In order to understand aspects of the Turkish lobby, some observations on the nature of relations in that country is needed.

## **2.2. The differences between other ethnic groups and the Turkish community in the U.S.**

When trying to analyze the Turkish lobby, it is necessary to understand the Turkish people, specifically the Turks residing in the United States, and make a brief comparison between other ethnic groups and ethnic Turkish people of the U.S.

To begin with, compared with the other ethnic minorities, Turks are a small minority. The estimated number of Turks inhabiting in the United States are approximately 450,000. This is compared to 3 million Greeks (77). Compared to the majority of other ethnic groups, the Turkish population in the United States is in a way a newly developed society. Turkish immigration to the U.S. was limited until the 1965 Immigration Act. Nevertheless, the average number of Turks immigrating to the U.S. was never more than a thousand per year (78). Secondly, an important difference, and in fact a gap lies in religion, Turks are a Muslim population, which is contrary to the high percentage' of potentially

adverse Christian ethnicity. Religious ethnicity can be an important factor when lobbying. Believers of the same religion are likely to collaborate with each other more, which is beneficial when minority groups are in question. When lobbying, religion can be used as an influential tool, for example the Greeks used Sunday Church services to condemn those Greek Americans who voted against the ban, or in other words, the ones who were blocking their way.

Ata Erim, former president of the Federation of Turkish American Societies Inc., basically divides the Turkish settlers into two, (the first settlers came to the U.S. in the 1950s and the second wave after the 1950s). According to him, the first settlers did not integrate into the society, but the second group of settlers did (79). The Turkish population in the country mainly consists of upper middle class citizens, with a high rate of literacy. Many are known to have arrived in the U.S. for a higher degree of study; undergraduate and post graduate studies, and stayed on. Therefore, their nature has enabled them to blend into the society, and in fact to become Americans (80)(81). According to Dr. Engin Holmstrom, a committee member of the American Turkish Association, Inc. of Washington, DC, they were assimilated into the society, mainly because they did not have identifiable characteristics, such as black skin or Arabic features, or in other words did not possess features which could be basis for some form of discrimination. Additionally, the fact that they were mainly well educated and well off made it easy to be assimilated (82).

Unlike the other ethnic groups they are spread around the country. This is not a problem if they were present in vast numbers concentrated in one place, but when there is only 450,000, this leaves a very small ratio per capita. Approximately 40% are spread around certain areas, but like other ethnic groups they do form groups (83). Turks have settled in or near major urban areas. The majority live in the New York area, with Chicago a distant second and smaller concentrations in Detroit, Los Angeles, San Francisco and Philadelphia (84). However, their numbers never exceed a few thousand within a community. Thus, they can not form communes, whereas the other ethnic groups when in a certain zone, can form communes, such as forming their own quarters - like the Italian quarter, or China Town -, or have their own private schools and religious centers within a neighbourhood. In fact, certain states are known to be heavily populated by certain ethnic groups. Maryland is heavily Greek populated and California is heavily Armenian populated (85). This is important in terms of affecting Senators, for whom the votes are what counts. These factors bring forth certain problems for the Turks.

These problems are mainly evident in fund raising, and in imposing a certain request on the Senators of the area. In respect to lobbying, fund raising for a Congressman who will, in return, protect one's interests is important at the grass root level. To be able to impose something on one's Congressmen, one must be able to penetrate the system; the more one instigates letters, or phone calls, the better it is for the cause. When in masses it is easier to raise one's voice, and hence to influence.

The Turkish lobby should be dealt with in the light of the above mentioned nature of the Turkish community. When assessing their activities these points should be kept in mind. Additionally, an important aspect lies in the norm of Turkish Americanism; i.e. the development of a Turkish American sense of identity, ripened step by step through the enlargement of the horizons of Turkish immigrants, which evolved because of anti-Turkish lobbying efforts of its two rivals which are the Greek and Armenian lobbyist's propaganda (86).

### **2.3 Turkish Americanism**

According to Kemal Gökner, former president of the Assembly of Turkish American Associations, "the importance of defining Turkish Americanism lies in the fact that may shed light on the present and future of our associations' organized activities and provide a theoretical framework in raising new generations" (87).

The first generation of Turkish Americans (Turks who immigrated to the U.S. after the 1950s) went through three stages; from transition to adversity and finally to organization. Each period has affected their identity. Stage one is the transition from one culture to another, which has touched upon the deepest sense of the national character that is built on the system of honour and shame of the traditional society from which they sprang. The first arrivals in the U.S. were mainly people with high educational ambitions, who planned to return home and to serve their countrymen in their respective fields, and be beneficial to their nation.



This was based on the notion that it was not honorable to leave one's country, hence not honorable to be an immigrant. Due to this mentality they only engaged in certain cultural and social activities, leaving political matters to the Turkish government. The Turkish government in the meantime had a tendency to not to share its foreign policy matters with its people, and it was hardly interested in its immigrants. Therefore, there was a lack of unity, in each family Turkish culture was passed from one generation to another in its own peculiar way, each like an island isolated from one another.

The second stage began in the 1960s and 1970s when two changes occurred. First, the majority of Turkish immigrants decided to stay on and secondly, now that their ethnic pride was endangered, with the anti-Turkish propaganda efforts instigated by the Greeks and Armenians, it was clear to them that there was no one else to defend the Turkish cause but themselves. This led the local leaders to emphasize the similarities between them and consequently realize the need to get together. Thus association after association flourished. The second stage has given way to the third, and the 1980s was the time for unity and coordination of all Turkish Americans. The time became ripe to form not only regional, but also national organizations (88).

In short, Turkish lobbying activities began as a result of problems caused by the adversaries and thus due to the recognition of Turkish causes, both at the level of Turkish government and Turkish-American citizens of the U.S.

## **2.4. Turkish Lobbying Mechanism**

When analyzing Turkish lobbying activities it is probably necessary to make a distinction between unofficial lobbying institutes and official lobbying companies. This division is needed to be able to distinguish not only the direct lobbying elements from grass roots lobbying elements, but also to distinguish the characteristics and the differences between them.

The unofficial institutes are institutes mainly operating on the grass roots level exercising an indirect lobbying approach. They handle lobbying on an unprofessional basis, whereas the official companies are officially registered in FARA and operate as lobbying companies on behalf of the Turkish government. They operate on a professional level, to pursue Turkish interests in the United States.

Both the unofficial and the official lobbying groups have had to contend two adversaries, namely the Greek and Armenian lobbies in their efforts to achieve their aims against the Turkish community and Turkey. These lobby groups have one major common aspect, which is that they are both linked to the Turkish state either officially or unofficially. This is to say that these unofficial lobbying groups are linked to the Turkish government. For example, it is the Turkish embassy that prompts them to such actions as fund raising for a certain Senator. The following analysis will focus on these two levels of lobbying.

### **Chapter 3. Unofficial Lobbying Institutes and Associations**

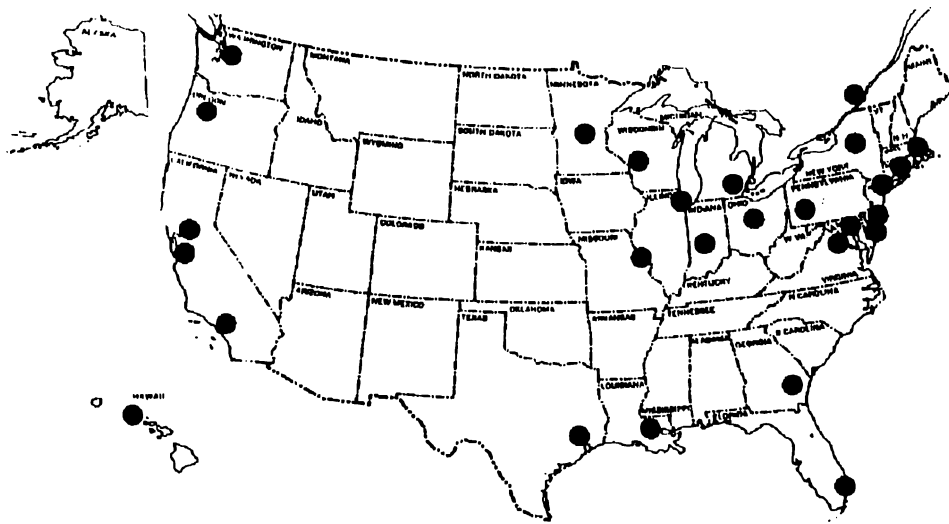
These institutes and associations are mainly operated by people of Turkish ancestry living in the U.S. As mentioned previously they do not perform official lobbying. The majority are formed in order to educate the Americans about Turkish culture and the Turkish community. Their base line is Turkish Americanism, and are all non-profit, tax exempt organizations. The common denominator is to keep the Turkish culture alive, and enlighten the American community both in historical and cultural terms as well as to lobby unofficially on behalf of Turkish interests.

There are over sixty Turkish American associations operating in the United States (Appendix C). These associations were originally formed to enable Turks to gather in social activities, such as celebrating the Feast of Sacrifice. The oldest one, according to Dr. Engin Holmstrom, is the Association of Turkish Americans of Columbia, formed in 1965 (89). (Figure 2 shows the states with Turkish associations as of 1980.) With the arms embargo the shape of the organizations changed, for they decided it was time to meet the intensive campaign conducted against Turkey and Turks by ancient rivalries which spilled over to the U.S. (90). First they engaged in local lobbying activities (91). From then on, the Turkish Americans shared one common cause; presenting an alternative view to the Americans on the issues and accusations put forth by the two

adversaries. Other problems these associations tend to have in common are the small size and limited financial resources of the community.

The main institutions concerning the study of Turkish lobbying activities that will be dwelled upon are the two major ones; the Assembly of Turkish American Associations (ATAA), and the Federation of Turkish American Societies Inc. (FTAS).

**Figure II. States with Turkish American Organizations**



Source: ATA-USA, . vol. I. No 3&4. (May-August 1980) p. 11

### **3.1. Assembly of Turkish American Associations (ATAA)**

The assembly was founded in 1979 by the collaboration of the American Turkish Association of Washington D.C. with the Maryland American Turkish Association. Its first president was Dr. Ülkü Ülgür, MD.. Due to the fact that the assembly is a cultural and ethnic organization, it is tax exempt. Its objective is to coordinate the activities of regional Turkish American Associations for the purpose of presenting an as realistic as possible image of Turkey and the Turkish people. The idea behind this purpose was to enhance understanding between the Americans and Turks (92). The assembly has fifty associations as members as well as 10,000 individual members, both Turkish and American. The forefather of the assembly is in some respects the former Ambassador Şükrü Elekdağ, who introduced the idea of uniting the Turkish American Associations under an umbrella organization.

Dr. Ülkü Ülgür stated that the activities of the assembly were targeted to achieve three goals. First, to represent Turkish interests in the political arena to the American executive and legislative branch and then to the American public. Secondly, to educate the Americans about Turks and Turkey, and to pass on to them relevant information. Thirdly, to preserve their own heritage by having cultural activities among themselves (93). Dr. Ülkü Ülgür put forth the ideology of the Assembly in the following statement:

Today ATAA is responding to well financed and organized activities of many groups committed to the destruction of Turkey. It is using an aggressive strategy that includes effective lobbying efforts, education of the public and news media, as well as development of viable coalitions with parties having common concerns with the Assembly. In my judgment, simply protesting will not alter the course of events (94).

One of the main activities of the assembly is to act reactively against Armenian and Greek lobbies' attempts to distort Turkey's image both at the Congressional and the public level. The assembly also organizes social activities to serve Americans such as workshop groups that provide educational sessions. This is especially due to the need to increase Turkish vigilance in public schools. The need arose because of the attempts to introduce anti-Turkish propoganda into public schools, such as the social studies book The World: Past and Present published by Harcourt Brace Jouvnovich Inc. and prepared by a staff of 38 people, that provides inaccurate and distorted information about Turks, yet is used in Virginia public schools. An extract from the textbook is as follows,

The Turks were a mountain people who had been slaves of the Arabs until about the year 1000. Then they began to rebel. Soon they managed to capture the entire Arab Empire, including Jerusalem. In that holy city they neglected ancient shrines and prevented Christians from visiting them. The Turks often robbed or killed Christian visitors (95).

The idea is if you can educate one teacher, s/he will in return educate hundreds (96). The aim is the same as in other Turkish organizations, that is to educate the American public. Additionally, the organization engages in fund raising activities for Congressmen, who have been and are likely to be beneficial for Turkish interests. The ultimate aim is to assure the reelection of those Members of Congress who will be beneficial to Turkish interests. Therefore, they have so far fund raised for certain senators such as, Stephan Solarz (Republican New York), and Ronald Reagan (Republican Texas) (97).

Additionally, the assembly has certain publications as follows: *The Turkish Times*, a biweekly newspaper which covers Turkish-American issues and affairs, including editorials and business information. Its circulation is 30,000. *ATAA clipboard*, a bimonthly newsletter, is available only to member associations. The Assembly also publishes occasional paper series as well as documentary books such as Armenian Allegation - Myth vs. Reality and Turks and Armenians (98). Lastly, two journals, *ATA-USA* and *ATA News* are published. *ATA-USA* is distributed to more than 8000 individuals, as well as to corporations, agencies, public communication organizations and members of Congress, providing news from Turkey. Other topics include Assembly (ATAA) activities, the Turkish and other embassies regarding Turkey and its relations with other nations, information regarding activities in the U.S. Congress pertaining to Turkey, and information relevant to the analysis of current issues pertaining to Turkey and Turkish American relations (99). The major

issues dealt with are the problems concerning the Cyprus issue and Armenian claims, a constant flow of articles are seen dealing with them, as well as articles about Turkish history, presenting a background information for the current debates.

### **3.2. Federation of Turkish American Societies Inc. (FTAS)**

The second major organization is the Federation of Turkish American Societies Inc., shortly the Federation. It was established in 1956. It is known to be the headquarters of the World Turkish Council, and one of its major aims is to provide coordination and cooperation among its constituencies, and to represent the political view of the Turkish community in connection with U.S. foreign policy vis-à-vis initiatives taken by the two adversaries. The Federation is a member of the ATAA, and has thirty member organizations. These memberships include dialects of Turkish speaking groups outside Turkey, such as the American Association of Crimean "Turks", the Turkestan American Association, and the Azerbaijan Society of America. They are in contact with more than 8000 Turks. The Federation promotes fellowship, works to advance cultural and educational interests, seeks to preserve the knowledge of the cultural heritage of Turkey and the U.S. (100)(101). Such a combination of dialects of Turkish speaking groups can be viewed as beneficial in terms of alliance. Yet, the priority should always be given to Turkish people of Turkey and Turkish interests.



The Federation maintains the Turkish Cultural Center in New York and a library of 500 volumes. It participates in Children's Day (23 April), Youth and Sports Day (19 May), Turkish Day parade(16-22 May) and Atatürk's Commemoration Day (10 November), as well as broadcasting a Turkish radio program in New York. It also publishes a semiannual magazine called *Görüş* (Opinion), which is published in Turkish, aiming to serve the Turkish community in the U.S. Besides *Görüş* the Federation used to publish a quarterly journal, *Vision* with a circulation of 3000. The journal was aiming to serve the American public, but due to financial problems the Federation has recently stopped the publication (102)(103).

The objective of the Federation is the same as that of ATAA, that is to present the other side of the story, and to enlighten the American community which is generally misinformed on Turkey and Turkish culture as well as on Ottoman-Turkish history (104). The main priority of the Federation is not lobbying, but rather to highlight the concerns and the problems of the Turkish community. However, literally their task is to respond to anything that is against the community, and they believe that timely response is important. The problems they confront vary. Their mission includes minor problems such as, Turkish people's problems of accommodation in the U.S. The Federation works in cooperation with the Turkish Consulate. In fact, it operates as an information bank for the Consulate (105).

The former Ambassador to the U.S. (1979-1989) Şükrü Elekdağ's views on certain activities of the Federation can also be evaluated as a good summary of the Federation's activities and achievements in terms of lobbying:

The Federation has demonstrated its success in meeting challenges continuously during the years. By maintaining ties and attachments to the Turkish community abroad while forming an essential bridge to American political life, the Federation and 400,000 or so Turkish Americans in the U.S. have acted as a vital and creative force in American life..... The Federation of Turkish American Societies has demonstrated foresight, fortitude and sagacity in dealing with hostile lobbying determined to undermine Turkey's position in influential American political and thought circles. Members of the Federation..... sought to increase understanding of Turkey among those who help shape U.S. thinking and policy. Most importantly, the Federation successfully has sought ways of reaching out to American community, interests, leaders, groups and individuals across the American spectrum of U.S. society, seeking and finding common ground, sharing vision and purposes (106).

The major and possibly the most important annual activity the Federation has been holding since 1981 is the Turkish American Day parade, to which priority is given. In the eyes of the Federation it is not

only a significant way of presenting Turkey and the Turkish culture but also important in terms of bringing together the Turkish community, enabling them to gather. For them to be able to gather thousands of Turkish people is a great achievement. Due to this belief U.S. \$ 1 million is spent every year, subsidized by the Turkish government on the occasion. The parade takes place annually during the Turkish American Cultural week in New York, in May, which is attended by parliamentarians' groups from Turkey, with an average of 25,000 participants (107)(108). Although the Turkish Day parade signifies for many the feeling of unity with Turkey, its significance in terms of lobbying can be questioned. It is both time and money consuming for Turkey, yet the outcome in terms of media coverage does not fulfill Turkish interests.

The next chapter will dwell upon the official lobbying functions of the Turkish lobby, and will be examining the activities of the firms that are officially employed by Turkey for the purpose of lobbying.

## **Chapter 4. Official lobbying Companies**

As mentioned previously, there are three lobbying firms, Hill and Knowlton (H&K); International Advisers Inc. (IAI); Mcauliffe, Kelly, Rafaelli, and Siemens and Thompsons and Company. Besides these companies there is a fourth company, Arnold and Porter registered under FARA on behalf of a Turkish firm, Profilo Holding A.Ş., that produces electrical goods. These firms are registered in the U.S. Department of Justice as foreign agents acting on behalf of Turkey under FARA. Like all other foreign agents, these firms do not only have to register by providing a copy of the agreement signed by the two parties, but also provide the Department with their ongoing activities. In order to do so they have to present a supplemental statement every six months. Turkey annually paid approximately U.S. \$ 3 million to these firms. The objective shared by all these companies is to safeguard and enhance Turkey's image and interests in its relations with the United States. The words image and interest are the key factors behind the whole process. The foremost duty of a lobbyist is "reputation management". They have to create a good image of their client and preserve the image. An examination of these firms is in order to evaluate whether the objectives set forth were achieved.

### **4.1. Hill and Knowlton (H&K)**

Hill and Knowlton, the first lobbying firm that was employed by Turkey, is known to be one of the giants among public relations firms.

Turkey is not its only customer, and the firm also works on behalf of countries such as Brazil, the Republic of China, Poland, Japan and Kuwait in the context of the Gulf crisis. The firm was established in the United States by Robert Gray under the name of "Gray Company" in 1981, and signed its first contract with Turkey in 1983. In 1986, the firm was sold to a British advertising company, Hill and Knowlton. However, the employment continued and Turkey pays the firm for its activities an annual fee of \$1,100,000 (109).

According to the agreement signed in September 22, 1988, Hill and Knowlton has agreed to assist the Turkish Embassy with respect to relations between Turkey and the United States. The sole purpose of the agreement was to engage Hill and Knowlton to assist the Embassy to design and implement an effective strategy for lobbying and public relations activities to maintain Turkey's interests in the U.S. According to the agreement the responsibilities and duties of the firm are divided to two; government and public relations (110).

On the governmental level, it is Hill and Knowlton's responsibility to provide the embassy with ongoing information regarding all legislative activities that are of interest to the Turkish government as well as to provide the members of the Legislative branch with accurate information on all items that are of interest to Turkey, and last but not least, to pursue to address all allegations made against Turkey (111).

At the public relations level, it is Hill and Knowlton's responsibility to enhance and improve the image of Turkey and the Turkish people through appropriate public relations activities under the supervision of the embassy. These public relations activities include certain tasks of mass-media relations arrangements - news releases -, television, radio, and press conferences. Additionally, it is also its responsibility to assist the embassy with documentary films on a subject chosen by the embassy, and with programs to "rectify substantial factual errors about contemporary Turkey and Turkish history " in school textbooks and standard encyclopedias; and in "countering any campaign or activity that is harmful to the interest and image of Turkey" (112). Although the firms do not have scholars of the Middle East and Turkey on board, they have access to a certain number of objective scholars. For example, the statement of 69 scholars brought focus to the fact that if Resolution 192 of Armenian genocide (June/December 1985) was to pass, it would damage the credibility of the American legislative system, because the issue was based on a historically questionable assumption. The statement appeared in 1985, in the New York Times and the Washington Post, addressed to the House of Representatives (113).

It is also among Hill and Knowlton's responsibilities to inform the embassy about any developments which take place in the media that may affect Turkey's interests and image, and to foster response as well as to counter any campaign or activity that is harmful to both.

According to Aslı Orer, under secretary of Hill and Knowlton Ankara bureau, Hill and Knowlton has been furnishing lobbying and public relations services to improve the perception of Turkey in the U.S. and to foster a deeper understanding of Turkish conditions and policies under the guidance of the Turkish embassy. Since resources available for this undertaking are limited, the primary focus has so far been on lobbying, and accordingly, in 1989 and 1990, the highest priority was given to the "Armenian Resolution". However, in the long term their main concern has been to continue to foster a more agreeable climate of opinion and action on specific issues, such as; the 7:10 ratio, Cyprus, Aegean sea, and terrorist activities, specifically in southeastern Turkey. Hill and Knowlton proposed to Turkey in 1990 an intensification and expansion of activities to promote the overall image of Turkey with particular emphasis on benefiting Turkey's economic interests, including Turkish export trade promotion and investment (114).

The key name Hill and Knowlton uses is Gary Hymel, who served 8 years as consultant for the chairman of House of Representatives, Tip O'Neil. During Ambassador Şükrü Elekdağ's tenure in Washington D.C. Gary Hymel took an active role organizing a visit of 125 members of Congress to Turkey (115).

#### **4.2. International Advisers Inc. (IAI)**

IAI was established in 1989 by Richard Perle, former under-secretary of the Department of Defense. The first contract was signed on

January 11, 1989 (116). Due to the agreement signed by the two parties, Turkey was to be the only customer, and the firm was to concentrate mainly on military aid to Turkey (117). The annual fee in the agreement set for Turkey to pay in return was estimated as \$875, 000, nevertheless in 1992 it was lowered to \$600,000 (118). As stated in the agreement;

The overall objective of IAI is to increase the mutual understanding between the peoples of Turkey and the United States and promote effective cooperation between the two governments so that the Republic of Turkey is able to carry out its significant defense responsibilities within the Western alliance. To this end IAI will assist the efforts for the appropriation of U.S. military and economic assistance to the Republic of Turkey... (119).

Within the framework of the agreement, some of the duties of IAI are to notify the embassy on time on political and media developments that are of concern to Turkey, such as military and economic assistance, Cyprus, and the Aegean; to help the embassy with legislation, and to support the public relations program of the embassy by contacting important celebrities of the media, business, and policy makers, as well as providing the media with timely response to matters that affect Turkey (120).

The first goal set forth by IAI was to blockade the 7:10 ratio concerning military aid to Greece and Turkey. Thus, in spring 1989, it succeeded to blockade the Greek lobby's proposal to secure the ratio. But



soon thereafter the Greek lobby came up with a new proposal that passed, despite counter efforts. The second objective was to bring to the floor the "Pipeline Amendment" which proposed a limitation on military aid to Greece. The rationale behind this proposal was that, Greece received more aid than it needed, and it did not make use of what it already possesses. Therefore, providing more aid would be superfluous. However, this was also countered by the Greek lobby to their benefit. In spite of Greek lobby's success on both issues, the important result was that now there was a counter power standing on its way. Additionally, one major success that can be attributed to IAI was its active efforts in the \$200 million aid granted to Turkey in 1991 (121).

The activities stated in the supplemental statement of 1991 by IAI in regard to political activities was as follows; "IAI held numerous meetings with officials of the Executive branch, members of Congress, and Congressional staff concerning legislation for the authorization and appropriation of security assistance to the Republic of Turkey." Accordingly, it is seen that IAI has contacted within the period, a total of 9 members of Congress, 50 Congressional staff and 44 Administration staff (122). (Appendix D).

There is one aspect of IAI which is important in terms of effectiveness; the company's links with the Jewish community, that is the company's key names such as Richard Perle, Dough Feith and Mark Feldman are a part of the Jewish community (123). The Jewish community is important in terms of alliance when lobbying. The Jewish

community has the most powerful lobby group in the U.S. and because they are a community with whom Turkey never had disputes, the Jews have nothing against Turkey. In other words, it is in Turkey's best interest to collaborate with Jewish Americans.

#### **4.3. The firms of McAuliffe, Kelly, Raffaelli and Siemens, and Thompsons and Company**

These are two law firms which are hired by the Republic of Turkey jointly. They were employed by Turkey in 1990 on the eve of the "Armenian Resolution", introduced by Robert Dole (Republican Kansas). Although it was not the first such resolution that was introduced to the Congress, this was the first time the resolution was brought up in the Senate, and not in the House of Representatives. An additional important factor about the 1990 resolution was that contrary to the Reagan administration, the Bush administration was not there to back up Turkey. Therefore, in the light of these two aspects the firms were hired by ambassador Nüzhet Kandemir for a 3 month period for \$200,000. The main reason behind the agreement was the firms' links with the Democrats within the Senate, and thus might be able to provide access to the Democrats (124).

The general belief is that the firms were very useful in blocking the passage of the resolution. But, other resolutions were expected to appear in the House of Representatives. Therefore, the agreement was extended and the fee was raised to \$800,000, however in 1992 the fee was lowered

down to \$500,000 (125). This reduction took place presumably because of Nüzhet Kandemir's success in bargaining at the time of the renewal of the contract.

The work of the firms were to be centered on promoting trade between the two countries in agriculture, textile and other products in the form of joint ventures, and the firms were to assist the embassy in setting up meetings with U.S. businesses as well as starting an information campaign to promote business opportunities in Turkey. The project set forth was to encourage U.S. companies to invest in Turkey and engage with their counterparts in joint ventures. The firms were also to help Turkey increase business opportunities and boost tourism (126).

In respect to the above mentioned objectives the firms were to represent Turkey before the Congress and the U.S. administration. On the public relations level, it was also within their duty to get in touch with legislators, policy makers, media businesses, and community leaders in support of Turkey's public relations program. Lastly, and most importantly, the firms were to advise and assist the embassy on pending legislation and on issues that required urgent attention (127).

A list of the people the firms have contacted within the U.S. Congress and administration are printed in the supplemental reports of the firms in 1990 and 1991. Among these activities are meetings that are arranged by Thompsons and Company for ambassador Nüzhet Kandemir with certain senators. In addition, in order to discuss general issues

concerning Turkey, the firms have contacted members of the Senate and House of Representatives, such as; Rob Torricelli (Democrat New Jersey), Richard Gephart (Democrat), Thomas Folley (Democrat Washington) and Rudy Boschwitz (Republican Minnesota) (128).

#### **4.4. Arnold and Porter**

Although Arnold and Porter is a firm that is registered as acting on behalf of Profilo Holding A.Ş., according to its registration form, Arnold and Porter is also involved in promoting Turkish interests. In contrast to the other firms, there is no written agreement between Arnold and Porter and Profilo Holding A.Ş. However, according to the registration statement signed in 1985, Arnold and Porter was to "render advice on U.S. laws, regulations, policies and proposed legislation that may affect or relate to the activities of the foreign principle and U.S.-Turkey relations" (129).

Within the guidance of information provided on the activities and aspects of both unofficial and official lobbying elements of Turkish lobby, the important questions addressed are: How effective are the Turkish lobbying activities ? What are the problems that prevent the mechanism from functioning at full capacity with the outcome of full benefit, at both indirect and direct levels? The following chapter will examine these questions and the efficiency of Turkish lobbying activities.

## **Chapter 5. How effective are Turkish Lobbying Activities?**

Since the term lobbying itself is a flexible concept, when evaluating the activities of the Turkish lobby in the U.S. it is very difficult to set up a concrete criterion to calculate effectiveness. Thus, one cannot easily estimate whether the Turkish lobbying activities are fully effective or not. In essence, effectiveness is parallel with the goal. The important issue is the achievement of the goal and fulfillment of the objectives. Aside from receiving military aid, it seems that so far the objectives have been limited to defend Turkey and the Turkish people against allegations and accusations made against them. Both Greeks and Armenians are ambitious and determined to achieve their goals regarding Turkey, whether irrational or rational (Appendix E). And, most importantly they are unlikely to give up until success is achieved. It is a known fact that they work to preempt the American public policy agenda by hurling charges against Turkey, such as the Turkish threat, Turkish expansionism, genocide and systematic violations of human rights in every conceivable forum. Some of the examples of the charges made by the two groups can be seen in Table II and Table III. Table II is a leaflet that was distributed in front of the Turkish Consulate New York in 22/4/1994 which is considered as the anniversary of the Armenian Genocide. Table III is an abstract of an ad that appeared in both Australian and American newspapers in July, 1994 as a product of American Hellenic Institute and Australian Hellenic Council.

Table II.

**Turkey Will Get Over HALF A BILLION of OUR Tax Dollars This Year!**

What will we get in return? A country that....

- Dumps subsidized steel, textiles and glass into the U.S., putting more Americans out of work
- Supports ethnic cleansing in Nagorno-Karabagh by Azerbaijan by providing mercenaries, money, arms and advisors
- Cheats U.S. companies by pirating almost a QUARTER BILLION DOLLARS worth of copyrighted material
- Spends millions of dollars on public relations firms in the U.S. to cover up and deny its Genocide of the Armenians
- Wages war against 20% of its own population- the Kurds using American military hardware
- Occupies 40% of the territory of one of its neighbours - Cyprus
- Blockades another neighbour - Armenia - obstructing U.S. and international humanitarian assistance efforts
- Is one of the world's worst human rights offenders according to Amnesty International, Human Rights Watch and the U.S. State Department

**What can YOU do about it?**

Call or right your Senators and Representatives and tell them how they can save you, the tax payer, over \$ 540 million every year by cutting aid to Turkey, the third largest recipient of U.S. foreign assistance.

Senators: Carol Mosely-Braun (312) 353-5420      Paul Simon (312) 353-4952

Representatives:

Cardliss Collins (312) 353-5457	Philip Crane (708) 394-0790	Harris Fawell (708) 655-2052
Luis Gutierrez (312) 509-0999	Dennis Hastert (708) 406-1114	Henry Hyde (708) 823-5950
William Lipinski (312) 886-0481	Dan Rostenkowski (312) 276-6000	Mel Reynolds (312)568-7900
Sidney Yates (312) 353-4596	John Edward Porter (708)392-0303	Bobby Rush (312) 224-6500
Donald Manzullo (815) 356-9800	George Sangmeister (708) 859-3554	

Source: Turkish Foreign Ministry

Table III.

<p style="text-align: center;"><b>20 YEARS ARE ENOUGH</b> <b>and to declare that we had enough of:</b></p> <p>20 years of continuous occupation of 37% of Cyprus by Turkish Troops 20 years of humiliation, rape, torture, looting and desecration of monuments 20 years of deprivation and death to those left in occupied areas of Cyprus 20 years of continuous destruction of our cultural heritage 20 years of struggle for freedom and justice to all Cypriot citizens 20 years of a continuous change to the demographic composition of Cyprus by the importation of settlers from the mainland Turkey 20 years of denial of basic human rights to Cypriots living in the occupied part of the island 20 years of provocative and continuous defiance by Turkey of UN resolutions calling for the withdrawal of all foreign troops and reunification of the island</p>
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Source: Turkish Foreign Ministry

Contrary to Armenian and Greek lobbying activities, the majority of Turkish lobbying activities, especially those at the indirect level, are activated when there is a certain danger arising from an adversary. These efforts appear to be sporadic and do not go beyond "serving the day".

The Turkish government does not seem to have a long term national policy. There is a lack of long term goals and plans to be implemented. When there is a change of government all the policies set before are abandoned. Every election marks the beginning of an era for new policies. Turkish foreign policy regarding the United States is consistent only in terms of aid and anti-defamation. The lack of a long

term national policy leads to a lack of consistency. This inconsistency is also evident in lobbying.

Turkish policy seems to be one of crisis management. Thus it does not seem to have a long term national policy on issues such as ethnicity (e.g. The Kurdish issue, is treated in an inconsistent manner, and change of circumstances, and international pressure affect the decision making process). Especially within the U.S. - Turkish context such problems are likely to back fire in the form of human rights violations. This shows a lack of long term goals and plans to be implemented. Consequently, Turkey does not have a long term lobbying policy, but a defensive policy on a case by case basis. Turkish lobbying policy in the U.S. is focused only on aid and anti-defamation. Yet, anti defamation and aid cannot be viewed as long term objectives. It is important to have a long term objective. Because it is necessary, if for nothing else to be able to fight adversaries on equal terms. The problems caused by them should not be handled when in crisis, but should be solved thoroughly and for good.

Therefore, when evaluating the Turkish lobby one must bear in mind not only the shortcomings it has, but also the disadvantages compared to their adversaries, especially at the indirect level. Probably the best starting point of evaluation would be through presenting some of the realities facing them and, since one cannot set up concrete criteria, compare the Turkish lobby with its rivals, the Greek and Armenian lobbies.



The main rival of Turkey in the U.S. is the Greek lobby. The members of Congress are sensitive to domestic political considerations, one of which is the Greek lobby. To the extent this lobby defines its own interests in an anti-Turkish vein, Turkey will continue to have problems in the Congress. To be able to overcome the power of the Greek lobby there is the need to make the Congress members to think in terms of the American National interest rather than local political pressure, which involves an active campaign of educating the Congress further on Turkey. However, when put into action any campaign on behalf of Turkey has certain disadvantages. Some of these disadvantages are as follows (130);

- In view of the changes in the East- West threat assessment and the demise of Soviet Union, it is likely to be argued by some that a long lasting threat has come to an end, i.e. the Soviet Union and communism.

- The frustration that the Cyprus problem endures, including irritation with the Turkish Cypriots for both the Congress and the Greek lobby, along with a tendency to place more blame on President of the Northern Cyprus (K.K.T.C.) Rauf Denktaş - and Turkey - than on Greece.

- Persistent allegations against Turkey on Human Rights violations.

The above mentioned issues seem to be permanent obstacles that stand in front of the Turkish government. Since the whole world is undergoing a transition period, some people are to argue that these

changes move Turkey's position into uncertainty in terms of the Western alliance. It is not the case of who is right or who is wrong or whether the assessments are true or not. To begin with the Cyprus issue is such a dilemma that will linger on for some more time, for neither of the parties can come to terms with one another.

As stated previously, the main problem Turkey faces due to the ongoing Cyprus issue is the Greek lobby. Thus, when making an evaluation possibly the best starting point is to go back to the arms embargo which gave rise to the need for an effective Turkish lobby. At the same time this is a perfect example of the shortcomings of Turkish lobbying activities and of constituency.

The Turkish reaction to the Greek lobby on the issue of arms embargo of 1975 was not only misguided, but was also ineffectual, the response was anger. Some Turks argued;

Why should Turks have to explain the obvious to the Americans.....certainly 30 years of friendship and alliance between the U.S. and Turkey would not be jeopardized for just a handful of Greek votes... Greece and Greek Americans not only have no case, but they are allowing their blind irrational passions to place NATO in a precarious position .... frankly, our case needs no defining, it stands on its merits; if the U.S. is unwilling, or unable to understand this then so be it - the loss will be theirs not just ours (131).

Contrary to this argument Şükrü Elekdağ elicits a very different approach that was presented to him by an American Congressman, who, indicating the fact that there were many different ethnic groups in his district, stated the following;

Though small in number, they try to keep me under pressure on subjects concerning them by use of mail, telephone, telegraph, and personal calls. During my campaigns, they take a place in front and ask questions. They contribute what they can legally to my campaign in order to show their respect and interest. Therefore, they are always there to remind me of their presence. They force me to learn matters which concern them and of course that's why I am in Congress. When a subject concerning their ethnic group is raised in Congress, my office in Washington is flooded with telephone calls and they send small delegations to call on me. As a result a group of 600 people creates what seems to be a constituency of 6000. In the case of Turkey , there are about 100 Turks who are in my congressional district, but they have done nothing to indicate to me their presence. They do not even vex me by telephoning as others do. In view of this, I reached the conclusion that they showed no interest in matters concerning them. I said to myself if Turkish Americans show no interest in matters concerning them, why should I sacrifice 600 votes. When I voted in the Congress against Turkey, it was because of this and not because I thought the Turkish case was unjustified. I am

sure that you have been told that the 150,000 Turkish Americans cannot meet the negative activities of other numerous ethnic groups. Those who have preferred such views may have lived in America for a long time , but they do not have enough insight into the American political system since our system is, above all, one of consensus. This system is susceptible to the views of each ethnic group that has organized itself, being conscious of its problems. Even if the group is small, if it can make its voice heard, we cannot remain indifferent to their problems and their message. I gave you an example from my own district. If those 100 Turkish Americans, in cooperation and solidarity with other Turkish Americans, were to imitate to some extent what the other group was doing, they would at least have neutralized them (132).

The above glimpse of the past can be enlightening in terms of certain factors that play a crucial role in the function of not only the Turkish lobby but also in a way of the system itself. Both statements put forth two contrasting approaches on how the issue was viewed. They both bring along a couple of crucial questions. The first is whether there has been any change in the mentality presented in the first statement. Because, it will be too optimistic to expect all Turkish Americans to adopt a new approach to the theme and become all of a sudden an active defender of the Turkish cause. As for the second statement, although there are truisms in the comment such as that the heavy work falls on the shoulders of the Turkish Americans of the region, that they have to

penetrate their Congressmen at every opportunity possible, nevertheless the question is that when it comes to action, would that Congressman sacrifice 600 votes in order to gain 100 votes? Probably not, but he may choose to do nothing, so as not to aggravate anyone.

The issue of voting brings the matter to something that the Turkish Americans lack, that is constituency. When there is not a constituency, one cannot achieve an efficient lobby, simply because votes are what count. Due to the Congressional mechanism, the Senate is vulnerable to its voters. A Congressman will pursue a case only if it is for the benefit of his district, or in other words, pursue it as long as it does not upset the majority in his district. Moreover, there is one issue which the Turkish Americans cannot compete with the Greek Americans, i.e. fund raising. The amount of money raised by one exceeds the other. Probably, this is again due to the problem of a small number of constituency.

Besides the above mentioned factors, there are certain other factors that block the way of an efficient Turkish lobbying. Certain shortcomings are evident both at indirect and direct levels. In fact, some are more than just shortcomings, but may be labeled as corruption. Some of the facts that block the way for an efficient lobbying may not be classified as merely faults, but aspects of ethical corruption.

At the unofficial level, the main problem is lack of unity among the Turkish Americans. Within a very short distance - New York and Washington D.C.- there are three main organizations ATA, ATAA and

Federation, which seems unnecessary, and in fact in some ways an unnecessary drain on resources. They all seem to be heading in their own direction, especially ATAA and the Federation. They all claim to be better than the other, and compete to prove it. Aydan Kodaloğlu, general director of Turkish American Association in Ankara, indicates that in July 1993, a retired General, Fred Haynes, who is the president of American Turkish Friendship Council, set up a meeting for the purpose of bringing all the Turkish American associations together. The meeting was held to find a solution for the disharmony among them. The issue presented to them was why they did not act together in coordination. The replies received were somewhat ambivalent, and pointed to a rivalry of personality (133). Representatives of ATAA said they were more important, for they were an umbrella organization. Those in the Federation said they were superior because they represented the Turks of the World.

Even if unity is achieved, the activities undertaken and the funds made available fall short of the community's potential, mainly because they are dependent on the government. Turks in the U.S., like the Turks in Turkey, are used to expecting funding and initiatives from the Turkish government. Contrary to other ethnic organizations that organize and finance on their own a project, the Turkish community tries to solicit official Turkish support. Many projects are likely to be abandoned, if such support does not come through (134).

An evident personality clash was and is still on the scene. This mentality does not achieve anything but on the contrary only builds up Turkey's expenses, for in most cases they have their general assembly meetings on different days of the year. Yet, they all ask for money from Turkey, documents, and ministers to attend the meeting. This is waste of money, time and work power. (135) The message which comes across is that priority is given to their self interests rather than Turkey's interests. All these are simply a burden preventing full efficiency.

During the research two peculiar issues emerged. The first one had to do with the Federation that could have easily overshadowed its credibility. One of their staff, from the editorial board of *Vision* is in fact in the United States illegally. As he himself has stated off the record, his visa had ended a couple of years ago. Yet he is still working in the Federation, which is to be representing the country and is located just above the Turkish Consulate, in the very same building. This simple incident is to point out that Turkey and the Turkish community cannot afford to make any mistakes of this kind, for there are rivals on the lookout to find an excuse for an attack. Such an incident would not only cause problems for the Federation itself, but also for the Consulate. The second issue is, although somewhat of a different nature, nevertheless is important in terms of difference in mentalities. In the supplementary document of International Advisers Inc. it is declared that \$7,088.88 was paid to a certain Turkish professor, as a consulting fee. One might question whether as a member and an active worker for ATAA she should

have taken this fee (136). As an assimilated U.S. citizen, she might believe that "time is money". However, this is the difference in the mentalities of Turkish Americans and of Greek Americans. Instead of taking fees, the Greeks donate as much as they can. In fact at the time of the embargo, money flowed into the American Hellenic Institute, not only from within the United States but from Greeks all around Europe (137). Seven thousand dollars could have been used on many beneficial things, such as fund raising or on some other worthy cause.

In terms of official lobbying, problems do not arise only from the officially hired companies, but also from the Turkish government, as reflected from the embassy. Since the United States is a consumer society, the alternative for constituency is money. As indicated previously, the Turkish government allocates \$ 3 million a year for its lobbying activities in the U.S. Approximately \$ 2 million is spent on the official companies, and the remaining money is reserved to be used by the embassy for the purpose.

In respect to the correlation of money spent on these firms, and the benefits obtained, certain questions may be raised, the answers to which indicate that Turkey is not getting value for money. To begin with, as indicated in Chapter 5, certain reductions were made in 1992, to IAI and the Firms. This reduction indicates a loss of approximately \$ 600,000 per year for the companies. Instead of taking measures to reduce the payments, the Turkish embassy could have persuaded these two companies to agree on a lower payment during the signing of the



agreements. Therefore, the question is why did the embassy not get into such an arrangement from the beginning, but just wasted the money. For some unknown reason, the embassy paid IAI \$875,000 until it reduced the payment fee to \$ 600,000. The important factor is if IAI was likely to agree to such a fee from the beginning, why was the initial contract not made over that price. As Sedat Ergin, a columnist of the daily *Hürriyet* states, the Firms McAuliffe and Thompsons are just two law firms working for Turkey half time, the link between the money they receive and the time they spend do not match.

Secondly, as mentioned previously, Turkey like many other countries spends a fortune on its lobbying activities. The question is, do these companies deserve the money they get, or is the Turkish government wasting its money. Art Lowing, in his article in the magazine Sky, points out to the skepticism directed against many of the lobbying firms, especially to firms like Hill and Knowlton who charge millions of dollars. Lowing states that according to critics, these firms' subtle handiwork is often too subtle to be noticed and that in fact a Senate aid who worked in the Hill for more than a decade indicates that "outside of a press release or two I have never met with Hill and Knowlton. You read about them getting all this money, but we shake our heads and wonder what they are doing for it" (138). Despite this, Turkey has been spending a fortune on Hill and Knowlton since 1983.

The above mentioned aspects indicate that there is a waste of money. Turkey could have done many other things with the money in

question, for example it could hire a fourth company. As to what the money is spent on, that is another case. The firms have arranged the meetings seen in Table IV for the Turkish Ambassador, Nüzhet Kandemir. One would assume that an ambassador does not need a lobbying firm to arrange his meetings with neither the Congress nor the Administration. Additionally, it is also a waste of time and money for any of Turkey's lobbying companies to make appointments with such senators like Stephen Solarz, who are known to be a friend of Turkey. They should be spending their time to persuade others to change their mind or at least to enlighten them. One would presume that the Turkish Ambassador would automatically have access to friends of Turkey.

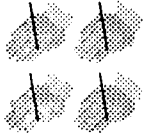

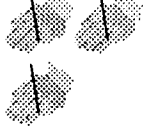

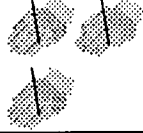


Table IV. A sample of the meetings arranged for the Ambassador Nüzhet Kandemir by the firms.

Arranged meetings for Nüzhet Kandemir, Ambassador, Embassy of the Republic of Turkey, to discuss general issues regarding Turkey. Meetings were held with the following:	
<u>Date</u>	<u>Name and Title</u>
8/16/90	Wendell H. Ford, United States Senator
11/28/90	Richard Gephardt, Member of Congress
12/18/90	Lloyd Bentsen, United States Senator

Source: Supplemental Statement. Registration No. 1094. (August, 25, 1990). Attachment 2. Item 12

Another issue that is effective on the efficiency of the activities is credibility. When in search of a lobbying firm, priority should be given to the credibility of the firm, which leads to the debate whether Hill and Knowlton is credible or not, especially after the Nayirah scandal -the fact that Hill and Knowlton misled the Congress by bringing forth as a witness the daughter of the Ambassador of Kuwait and disguised her identity. This incident was a scandal because her speech had inspired the Congress to take on action against Iraq, and gave signal to start the Gulf war (139). In spite of the fact that Hill and Knowlton claims it is to have no bad affect on their name and fame, it is likely to have damaged their activities concerning Turkey (140). And contrary to what Hill and Knowlton says, Paul Holmes, editor of *Inside Pr* claims that "there is a widespread feeling within the industry that Hill and Knowlton has brought some discredit to our business" (141). As for the fame of Hill and Knowlton, Table V shows that Hill and Knowlton is listed among seven firms that have a bad reputation, this figure also indicates how Turkey is viewed in regard to human rights. And what they do to defend Turkey when faced with an accusation is not always accurate. Journalist Art Levine indicates that although Frank Mankiewicz, vice chairman of Hill and Knowlton's public relations division, claims that Turkey is "making great strides in human rights" but when asked can not come up with an example. This not only reduces his personal credibility, but that of the country on whose behalf he speaks (142).

Table V

<b>Who's the Sleaziest of Them All?</b> Blood-on-the-Handle Index, a ranking of moral turpitude of seven lobbying and public relations firms is shown below. Rankings are determined according to the number of human rights violations committed by clients and the fees charged by the firm.		
RANK LOBBYIST	BLOOD-ON-THE-HANDS RATING	PARTIAL LIST OF PAST AND PRESENT CLIENTS
1. Black, Manafort, Stone and Kelly		Somalia, Zaire, Nigeria, Kenya, the Philippines (Marcos era), Peru, the Bahamas, the National Union for Total Independence of Angola (UNITA), the Dominican Republic
2. Van Kloberg & Associates		Iraq, Mali, Romania, Liberia, Rwanda, Haiti, Myanmar, Zaire
3. Hill and Knowlton Inc.		Turkey, the People's Republic of China, Citizens for a Free Kuwait, Haiti (Duvalier era), Angola, Saudi Arabia, South Korea, Adnan Klasbeggi, Bank of Credit and Commerce International (BCCI)
4. Neil and Company Inc.		Liberia, Pakistan, El Salvador, Kenya, Jordan, Kuwait, the Sudan
5. Paton, Beggs & Blow		Guatemala
6. O'Conner & Hannan		Bolivia, Ecuador, El Salvador
7. Tom Scanlon		The Dominican Republic

Source : Art Levine. "Inside Washington's Propaganda Shops." *Spy* ( February 1992) p. 15

As seen in chapter II, lobbying is to be something conducted through open doors, and accordingly, all the activities and duties of the companies are available to the public at the U.S., Department of Justice. However, when a Turkish citizen poses the question what do you do for Turkey, to one of these firms, the answer is confidential. Confidentiality, besides blocking the way, arises suspicion and above breaches the Public Disclosure Act. Why there is such a need for confidentiality is unknown, for with all the companies, the only issues that must remain confidential are stated in the agreements in a stereotype manner; "----- shall safeguard as confidential any political, military, economic or other information provided to them in confidence by the embassy" (143). Confidentiality is necessary and justified, but it does not help account for all their activities. Yet, as overly sensitive as the Turkish state tradition is towards imparting with any information, even if it is unclassified, one should not blame the firms for being utterly cautious.

However, despite the above mentioned aspects, one cannot say the firms are useless, although they all have certain shortcomings. The counter efforts of IAI to attack Greece in 1989 with the "Pipeline Amendment" were worthwhile efforts. Yet, what went wrong, why were they always on the losing side in the fight? Due to the agreements signed by all the firms, they have to collaborate with each other. For when there is a success or a failure it cant be attributed to only one, all have to work in coordination with the others, both on indirect and direct levels. Although one cannot neglect the fact that the McAuliffe and Thompsons

were very beneficial, the prevention of the 1990 Armenian Resolution is a product of all: when in dire need, they have all worked together.

In regard to the companies, it will be also unfair to put the entire blame on them for the ineffectiveness of Turkish lobbying. For they are in reality only employees that are hired by the Embassy. They should be under the control of the Embassy. It is the Turkish government that tells them what to do and what not to do. Aydan Kodaloğlu, general director of Turkish American Association in Ankara suggests that when not in control of the Embassy the productivity is 20% whereas it could be 100%. For example, Prime Minister Tansu Çiller's visit to the United States in 1993 is viewed as a failure from the viewpoint of public relations. The point is that it is the duty of the Embassy to organize the firms, if it is unable to do so, then it should not be expecting a lot in return. Although it is expected of the Turkish government to organize its lobbying activities, it is disorganized, and draws a chaotic image. Besides the officially hired firms, Turkish Ministries of Agriculture and Tourism, from time to time take action to hire other firms to pursue a specific issue at hand. For example, Henry J. Kaufman & Associates for Turkish Ministry and Tourism and Zuckert Scoutt and Rasenberger for Turkish Airlines were hired in 1993 (144). These firms have probably been paid by the ministries' budget. Since promoting Tourism activities are already covered by lobbying budgets of the Turkish Government, it is controversial to use the Turkish Ministry of Tourism's budget to proceed with such plans.

There seems to be a decline in productivity regarding Turkish lobbying activities in terms of public relations. Therefore to be able to visualize this decline, it is best to make a brief comparison between the past and the present lobbying performance. In order to understand the decline of performance clearly, it is best to take a look back to Turgut Özal's era (1983-1993). In spite of the fact that most of his visits to the U.S. were on unofficial grounds, they were a success in terms of media coverage.

The question is what was the difference, what were the elements that made his visits successful?; To begin with, all of Özal's team arrived in the U.S., before his visit. The team consisted of people who were familiar with Washington D.C. and the mechanism. Their responsibility was to make certain beneficial deals in regard to public relations. For example, they would contact the Washington Post, with a deal on hand; in return for three columns on the first page they would donate a certain amount of money (i.e. \$20,000 ) to a Washington Post campaign or contact Larry King, host of the Larry King Live talk show on Cable News Network TV channel, which have brought a similar deal in return for a show. As a result, Özal became a headline personality, and took part in a show with Larry King. But, as for the visits of President Süleyman Demirel and Prime Minister Tansu Çiller, although their visits were official, nothing was mentioned in the media. This can be designated as a failure, especially in Demirel's case, for he had with him something the U.S. was waiting for, an opportunity to take a joint act to invest in the Caucasus.

Despite the fact that a very important issue was on the agenda, what appeared in the media was only a three line news. In Çiller's case the matter can be viewed as a scandal, for in fact on the eve of her arrival of the visit to New York, what appeared in one of the editorials of New York, was how Turks massacred the Kurds (145).

This leads to the question of how productive the Embassy itself is. The embassy should be the motivating factor, the most active part of the mechanism. To go back to the money reserved for the use of the Embassy, it is said that Ambassador Nüzhet Kandemir uses the money as he pleases, in the sense that he from time to time gives the budget to people who are ineffective in terms of lobbying yet are favored by him (146). Former Ambassador Şükrü Elekdağ is the only one who is said to have used the money in the most beneficial way. The basic difference is that Şükrü Elekdağ would not allow a lobbying firm to make an appointment for himself. Instead, he was viewed by the Turkish American community as being very active, that he would instead penetrate the senators persistently, in other words contrary to Nüzhet Kandemir he is known to be determined to exasperate the Congressmen until he had a hearing (147)(148).

The failure of Prime Minister Tansu Çiller's visit was mainly due to the mismanagement of the lobbyists whose duty was to make all the press arrangements beforehand. They were careless to offer Tansu Çiller to have a press conference in front of the World Trade Center in New York which was bombed by Muslim fanatics in 1993 (149). The failure of her



visit brought into the scene two public relations companies, namely; Capitoline and Fleishman and Hillard (FH). The first firm which contracted this year to improve Turkey's government relations at \$ 650,000 is Capitoline. The firm is founded by Charles Pucy, former vice president of Hill and Knowlton, in 1991. The second firm Fleishman and Hillard is a fifty year old firm hired at \$ 525,000 as a quarter for "image building and spin control" (150).

Some of the ideas put forth by the newly hired companies are realistic and worthy, yet there are already certain questions that cast a shadow on future expectations. Capitoline seems to be more interested with the issue of PKK (Kurdish workers' party) and the problems caused by it, it advises the need to present what a brutal and cruel terror environment is caused by PKK. In order to do so, it puts forth the idea to show the American public the incidents of PKK slaughtering women and babies. Although it would be an effective way of influencing public opinion, there is the problem of access to the media as well as the costs involved. Additionally it might be a good idea to expose the crimes committed by PKK, but the second idea put forth by Capitoline, to publicize the sentencing of the guilty parties, seems counterproductive. These firms have to realize that they are dealing with biased rival lobby groups, people that are on the watch, who are willing to use even the simplest and the most innocent act. Their policy is simple, the end justifies the means. To publicize such things is likely to give them an opportunity for counterattack on Turkey's not-so-credible human rights account. As for

Fleishman and Hillard, it claims to have experts in all the fields necessary for the Turkish cause, such as human rights specialists and New York media specialists, and *Inside PR's* 1993 agency report lists Fleishman and Hillard among the top five agencies, and first in terms of strategic thinking. All these qualities show Fleishman and Hillard as a perfect candidate for the representation of Turkey (151)(152).

As for Capitoline, contrary to Turkish Daily News' journalist Uğur Akıncı, Aydan Kodaloğlu believes that hiring Capitoline marks the end of Turkey's chance of effective lobbying, for two simple reasons; first, Charles Pucy, the head of the company, is not accredited, simply because he is a man who has been for some reason discharged from Hill and Knowlton. Second, it is a very small company, and it is questioned as to how it is to achieve what Hill and Knowlton has not achieved while it has branches throughout the country (153). If Kodaloğlu's arguments are true, then. Turkey will once again has to face the problem of credibility.

In summary, so far Turkish lobbying activities have not been very effective. The activities seem to have been only limited to when in need, when in crisis. The mechanism needs to be altered. Therefore, the last chapter will bring into being certain suggestions that can be beneficial to the altering of the mechanism.

## **Chapter 6. Suggestions for the Future**

Turkish lobbying activities are not sufficiently effective at present; and the foreseeable future is unknown, for the capabilities of the newly hired companies are yet to be tried, and are beyond the scope of this discussion. Therefore, the crucial question to be asked is what measures there are that can be taken to increase effectiveness. What can be suggested for the future? Glimpses of the past indicate a need of change in the attitudes of all the parties involved.

The first issue that seems to be pursued is to alter the Turkish policy regarding lobbying in the United States. It is time to establish long term policies, which will be implemented regardless of any change in the government. When lobbying, matters should not be handled on a case by case basis, but as a whole. Moreover, it is probably overdue, but is necessary to take on an offensive rather than a defensive approach. Secondly, there is a need for an effective embassy, that will activate as well as form a strict control over the current and future activities. It should be within the Ambassador's responsibility to manipulate the companies and guide the Turkish Americans. If the Embassy is to establish a stricter control over the companies, that would be likely limit unnecessary expenditures.

The ideal solution would probably be for the Turkish government to establish an effective mechanism that will take into account all the aspects of lobbying, and control the whole mechanism financially and

lobbying firms it hires. As for the problem of constituency, it can be also solved through finding new allies as well as using the potential one that already exists. Turkish Americans could find allies in their local area, and convince them to take a part in their cause by convincing them that they have the right cause and case, by educating them. If necessary the Turkish Americans should arrange as many as possible, local activities that will enable Americans to know who Turks are, what they do, or increase the number of workshops. For one of the main problems is the lack of knowledge on Turks and Turkey. The majority of Americans do not know anything about Turkey and the Turkish people. The rhetoric "barbarian Turk", and the image it reflects is still very much alive in the minds of many. One potential ally Turkey has in its hand is the Association of American Friends of Turkey. When the list of its members are examined, it indicates money and power (Appendix F). They might be activated politically, but for a price. Also since Turkey is, due to its need of military aid, a good customer, the arms industry would be a natural ally, for otherwise their sale would be affected in a negative way. They can all be beneficial in penetrating and suppressing the Congress.

The young generation of Turkish Americans could be encouraged to take part in both the political and legislative mechanism. They would be likely to fight for the Turkish cause more than any other American. It should not only be the Turkish Americans that participate in the action when lobbying, but also use all other resources available. There are many inhabitants who might not be voting yet can be influential on others that

do, or there are thousands of well educated, energetic students of Turkish Studies that can be very beneficial, simply because they know Turkey and Turkish needs and interests better than anyone else. This is likely to increase both productivity and efficiency and decrease costs.

As for the leaders of the organizations themselves, for success, it will be best for them to start a new era, and in doing so to leave their egotistic concerns aside and put an end to the conflict of leaders' personalities. They should search for means of union and self sufficiency.

On the Congressional level, it would probably be more beneficial to dwell upon the Congressional staff for they are the ones that do most of the work and are the power behind doors, thus influential on their Congressmen. In a way, they are the ones that do the research and subsequently advise their Congressmen to vote "yes" or "no". Besides approaching the Congressional staff, it would be within Turkey's interests to strengthen ties with the Democrats, because they are more sensitive to issues like human rights and need to be convinced on these matters, they ought to receive more attention than the Republicans. One adequate starting point, as a step to improve relations, can be through establishing a link between the youth centers of the two countries. For them to establish contact and exchange ideas, youth can be a perfect investment for the future, such a relationship can be beneficial in the long term. For some reason, Turkey has so far been approaching Congressmen that are elderly and thus are likely to retire within a short period of time, whereas the young generation is likely to be on the scene for many years to come.

To be effective, it is also necessary to make the best of the financial resources available. Turkey is not a wealthy country, therefore, it can only allow the use of a certain amount of limited resources. Ironically, however, money is the only power it has. Thus, the money reserved for lobbying should be used discriminately, carefully, and not a dime should be wasted. Consequently, instead of spending a \$ million on a Day Parade which attracts only the attention of a minority in New York, one may find hundreds of other means of using the money, on broader grounds, that will be beneficial in the long term. For example, the money in concern may be spent on getting TV advertisements, engaging in more talk shows, and increasing the number of seminars or even to establish departments of Turkish culture and history in universities, or if nothing else, use to sponsor the visits of more Congressmen; increase the number of mutual visits to foster understanding..

It will also be essential for Turkey and the Turkish community to abandon the existing defensive approach, and adapt an aggressive one. An aggressive approach is important in terms of confronting the adversaries mainly at the grass-root level. One of the things that is most dreaded by Turkey and the Turkish people is the movie "Midnight Express". In spite of the fact that a person caught with 4-5 kg's of heroine cannot be a hero by any responsible democratic standards, the film is used to deteriorate Turkey's image, for it presents a distorted picture of Turkey. Therefore there is a need to produce alternative motion films, these films could be financed by Turkey. Large budgets reserved for films

such as the latest movie on Bosnia can convince Hollywood producers to take on such movie productions. Moreover, it is best to make more use of books, for instance novels should be used as well as documentary books. As Russel Warren Howe, author of the book, The Power Peddlers, indicates " people learn more things from novels than from reporting and the same principle applies to films" (154). The ad of the novel Rise the Euphrates, by Carol Edgarian that appeared in the magazine New Yorker, points to the truth in Russel Warren Howe's statement.<sup>2</sup> Additionally, Turkey has certain valuable authors, whose works could be translated and distributed within the U.S. Summarily, there is the requirement to make use of everything available to introduce Turkish elements into the American society, ranging from Turkish themes, art, food, to academic exchange. As Russell Warren Howe suggests, "if a chain of Turkish pastry shops had similar popularity to the Chinese restaurants in this country, Americans would begin to be as innately well disposed toward the Turks as they are toward the Chinese" (155) Although this might seem to be an oversimplification, it can provide a basis for advertisement, any form of advertisement is better than having none at all. In addition such chains can provide also the basis for educating the American community about the Turkish culture.

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<sup>2</sup> The ad in New Yorker; Rise The Euphrates, a novel by Carol Edgarian. It is 1915. The year the Muslim Turks slaughtered one million Armenians. The year an orphan little girl forgets her own name, but remembers everything else. Robert Stone: " Vivid, chilling... will long remain in the memories." Rick Bass: " A work of Power, grace, beauty and exquisite tenderness. It will live for a long, long time in the manner of Wallace Stegner's Angle of Repose and Harper Lee's To Kill a Mockingbird." Amy Tan: " Carol Edgarian is a remarkable writer of intelligence and comparison.

In short, maximum effort is needed by all parties to achieve a successful lobbying strategy. For, lastly and most importantly, one has to bear in mind that there are harder times ahead. Until now, Turkey had only two adversaries, but today a third one is on the eve of its birth, i.e. "the Kurdish lobby". It is likely that soon a Kurdish lobby will emerge, which will double the charges and the problems Turkey faces. Therefore, preventive measures should be taken before the problem escalates.



## **Conclusion**

In conclusion, the whole process of lobbying is in the hands of the Turkish government. Hence to achieve an effective lobby for the future and to alter the disorganized form of the existing one, Turkey has to calculate how important the United States is, and aid received from the U.S., or why and how important is an Armenian Resolution. Then accordingly, it has to maneuver to broaden its perspective and go beyond the existing U.S.-Turkish context of anti-defamation and aid. And, consequently, it has to establish long term policies to be implemented. Instead of following a defensive policy, a forward policy is needed to be adopted; matters of genocide should not be handled on a case by case basis, but through counter attacks. These counter attacks should be composed of arguments based on solid grounds and thorough research.

In issues such as human rights violations the aim should not be limited to justifying the acts of the Turkish Government but signs of alterations in policy and improvement should be presented in order to prevent future accusations. Prevention of accusations by using the media effectively will have a greater impact than defensive counter attacks.

In summary, the Turkish state has to either grip the whole Turkish lobbying system, or drop it. If Turkey is not to change its attitude, then it is best to do the following; just employ a firm when in need for a short period of time, which will decrease the cost of lobbying. As for the Turkish Americans, they are the ones at stake because they are the ones who

have to live with these accusations everyday, therefore if a resolution is to pass they are the ones to decide if they can live with it or not.

In any case to pursue an interest effectively, the Turkish government and the Turkish Americans have to collaborate. The guidelines for action should be determined according to the U.S. lobbying system including its de facto standards and rules.

## ***Appendix A***

### **The Federal Regulation of Lobbying Act of 1946**

#### **TITLE III—REGULATION OF LOBBYING ACT**

##### **SHORT TITLE**

**SEC. 301.** This title may be cited as the “Federal Regulation of Lobbying Act”.

##### **DEFINITIONS**

**SEC. 302.** When used in this title—

(a) The term “contribution” includes a gift, subscription, loan, advance, or deposit of money or anything of value and includes a contract, promise, or agreement, whether or not legally enforceable, to make a contribution.

(b) The term "expenditure" includes a payment, distribution, loan, advance, deposit, or gift of money or anything of value, and includes a contract, promise, or agreement, whether or not legally enforceable, to make an expenditure.

(c) The term "person" includes an individual, partnership, committee, association, corporation, and any other organization or group of persons.

(d) The term "Clerk" means the Clerk of the House of Representatives of the United States.

(e) The term "legislation" means bills, resolutions, amendments, nominations, and other matters pending or proposed in either House of Congress, and includes any other matter which may be the subject of action by either House.

#### DETAILED ACCOUNTS OF CONTRIBUTIONS

SEC. 303. (a) It shall be the duty of every person who shall in any manner solicit or receive a contribution to any organization or fund for the purposes hereinafter designated to keep a detailed and exact account of—

- (1) all contributions of any amount or of any value whatsoever;
- (2) the name and address of every person making any such contribution of \$500 or more and the date thereof;
- (3) all expenditures made by or on behalf of such organization or fund; and
- (4) the name and address of every person to whom any such expenditure is made and the date thereof.

(b) It shall be the duty of such person to obtain and keep a receipted bill, stating the particulars, for every expenditure of such funds exceeding \$10 in amount, and to preserve all receipted bills and accounts required to be kept by this section for a period of at least two years from the date of the filing of the statement containing such items.

#### RECEIPTS FOR CONTRIBUTIONS

SEC. 304. Every individual who receives a contribution of \$500 or more for any of the purposes hereinafter designated shall within five days after receipt thereof rendered to the person or organization for which such contribution was received a detailed account thereof, including the name and address of the person making such contribution and the date on which received.

#### STATEMENTS TO BE FILED WITH CLERK OF HOUSE

SEC. 305. (a) Every person receiving any contributions or expending any money for the purposes designated in subparagraph (a) or (b) of section 307 shall file with the Clerk between the first and tenth day of each calendar quarter, a statement containing complete as of the day next preceding the date of filing—

- (1) the name and address of each person who has made a contribution of \$500 or more not mentioned in the preceding report; except that the first report filed pursuant to this title shall contain the name and address of each person who has made any contribution of \$500 or more to such person since the effective date of this title;
- (2) the total sum of the contributions made to or for such person during the calendar year and not stated under paragraph (1);
- (3) the total sum of all contributions made to or for such person during the calendar year;

(4) the name and address of each person to whom an expenditure in one or more items of the aggregate amount or value, within the calendar year, of \$10 or more has been made by or on behalf of such person, and the amount, date, and purpose of such expenditure;

(5) the total sum of all expenditures made by or on behalf of such person during the calendar year and not stated under paragraph (4);

(6) the total sum of expenditures made by or on behalf of such person during the calendar year.

(b) The statements required to be filed by subsection (a) shall be cumulative during the calendar year to which they relate, but where there has been no change in an item reported in a previous statement only the amount need be carried forward.

Cumulative statements.

#### STATEMENT PRESERVED FOR TWO YEARS

SEC. 306. A statement required by this title to be filed with the Clerk—

(a) shall be deemed properly filed when deposited in an established post office within the prescribed time, duly stamped, registered, and directed to the Clerk of the House of Representatives of the United States, Washington, District of Columbia, but in the event it is not received, a duplicate of such statement shall be promptly filed upon notice by the Clerk of its nonreceipt;

(b) shall be preserved by the Clerk for a period of two years from the date of filing, shall constitute part of the public records of his office, and shall be open to public inspection.

#### PERSONS TO WHOM APPLICABLE

SEC. 307. The provisions of this title shall apply to any person (except a political committee as defined in the Federal Corrupt Practices Act, and duly organized State or local committees of a political party), who by himself, or through any agent or employee or other persons in any manner whatsoever, directly or indirectly, solicits, collects, or receives money or any other thing of value to be used principally to aid, or the principal purpose of which person is to aid, in the accomplishment of any of the following purposes:

43 Stat. 1070.  
7 U. S. C. § 201-  
254; Supp. V. § 251; 43  
U. S. C. § 208.

(a) The passage or defeat of any legislation by the Congress of the United States.

(b) To influence, directly or indirectly, the passage or defeat of any legislation by the Congress of the United States.

#### REGISTRATION WITH SECRETARY OF THE SENATE AND CLERK OF THE HOUSE

SEC. 308. (a) Any person who shall engage himself for pay or for any consideration for the purpose of attempting to influence the passage or defeat of any legislation by the Congress of the United States shall, before doing anything in furtherance of such object, register with the Clerk of the House of Representatives and the Secretary of the Senate and shall give to those officers in writing and under oath, his name and business address, the name and address of the person by whom he is employed, and in whose interest he appears or works, the duration of such employment, how much he is paid and is to receive, by whom he is paid or is to be paid, how much he is to be paid for expenses, and what expenses are to be included. Each such person so registering shall, between the first and tenth day of each calendar quarter, so long as his activity continues, file with the Clerk and Secretary a detailed report under oath of all money received and expended by him during the preceding calendar quarter in carrying on his work; to whom paid; for what purposes; and the names

Report of money received and expended.

Nonapplicability.

of any papers, periodicals, magazines, or other publications in which he has caused to be published any articles or editorials; and the proposed legislation he is employed to support or oppose. The provisions of this section shall not apply to any person who merely appears before a committee of the Congress of the United States in support of or opposition to legislation; nor to any public official acting in his official capacity; nor in the case of any newspaper or other regularly published periodical (including any individual who owns, publishes, or is employed by any such newspaper or periodical) which in the ordinary course of business publishes news items, editorials, or other comments, or paid advertisements, which directly or indirectly urge the passage or defeat of legislation, if such newspaper, periodical, or individual, engages in no further or other activities in connection with the passage or defeat of such legislation, other than to appear before a committee of the Congress of the United States in support of or in opposition to such legislation.

Compilation and printing of information.

(b) All information required to be filed under the provisions of this section with the Clerk of the House of Representatives and the Secretary of the Senate shall be compiled by said Clerk and Secretary, acting jointly, as soon as practicable after the close of the calendar quarter with respect to which such information is filed and shall be printed in the Congressional Record.

REPORTS AND STATEMENTS TO BE MADE UNDER OATH

SEC. 309. All reports and statements required under this title shall be made under oath, before an officer authorized by law to administer oaths.

PENALTIES

SEC. 310. (a) Any person who violates any of the provisions of this title, shall, upon conviction, be guilty of a misdemeanor, and shall be punished by a fine of not more than \$5,000 or imprisonment for not more than twelve months, or by both such fine and imprisonment.

(b) In addition to the penalties provided for in subsection (a), any person convicted of the misdemeanor specified therein is prohibited, for a period of three years from the date of such conviction, from attempting to influence, directly or indirectly, the passage or defeat of any proposed legislation or from appearing before a committee of the Congress in support of or opposition to proposed legislation; and any person who violates any provision of this subsection shall, upon conviction thereof, be guilty of a felony, and shall be punished by a fine of not more than \$10,000, or imprisonment for not more than five years, or by both such fine and imprisonment.

EXEMPTION

SEC. 311. The provisions of this title shall not apply to practices or activities regulated by the Federal Corrupt Practices Act nor be construed as repealing any portion of said Federal Corrupt Practices Act.

43 Stat. 1079.  
2 U. S. C. § 211-254; Supp. V. § 211; 13 U. S. C. § 208.

TITLE IV—FEDERAL TORT CLAIMS ACT

PART 1—SHORT TITLE AND DEFINITIONS

SHORT TITLE

SEC. 401. This title may be cited as the "Federal Tort Claims Act".

DEFINITIONS

SEC. 402. As used in this title, the term—

(a) "Federal agency" includes the executive departments and independent establishments of the United States, and corporations

## *Appendix B*

### Repealed (1948) edition of 1938 Foreign Agents Registration Act

#### SUBCHAPTER I—GENERALLY

**§ 601.** Repealed. June 25, 1948, c. 645, § 21, 62 Stat. 862, eff. Sept. 1, 1948

#### HISTORICAL AND STATUTORY NOTES

Section, Acts June 15, 1917, c. 30, Title VIII, § 3, 40 Stat. 226; Mar. 28, 1940, c. 72, § 6, 54 Stat. 80, related to acting as a foreign agent without notice to Secretary of State, and is now covered by section 951 of Title 18, Crimes and Criminal Procedure.

#### SUBCHAPTER II—REGISTRATION OF FOREIGN PROPAGANDISTS

##### EXECUTIVE ORDERS

##### EXECUTIVE ORDER NO. 9176

May 29, 1942, 7 F.R. 4127

##### TRANSFER OF REGISTRATION FUNCTIONS FROM THE SECRETARY OF STATE TO THE ATTORNEY GENERAL

By virtue of the authority vested in me by Title I of the First War Powers Act, 1941, approved December 18, 1941 (Public Law No. 354, 77th Congress [section 601 et seq. of the Appendix to Title 50, War and National Defense]), and as President of the United States, it is hereby ordered as follows:

1. All functions, powers and duties of the Secretary of State under the act of June 8, 1938 (52 Stat. 631), as amended by the act of August 7, 1939 (53 Stat.

1244) (this subchapter), requiring the registration of agents of foreign principals, are hereby transferred to and vested in the Attorney General.

2. All property, books and records heretofore maintained by the Secretary of State with respect to his administration of said act of June 8, 1938, as amended, are hereby transferred to and vested in the Attorney General.

3. The Attorney General shall furnish to the Secretary of State for such com-

ment, if any, as the Secretary of State may desire to make from the point of view of the foreign relations of the United States, one copy of each registration statement that is hereafter filed with the Attorney General in accordance with the provisions of this Executive order.

4. All rules, regulations and forms which have been issued by the Secretary

of State pursuant to the provisions of said act of June 8, 1938, as amended, and which are in effect shall continue in effect until modified, superseded, revoked or repealed by the Attorney General.

5. This order shall become effective as of June 1, 1942.

## **§ 611. Definitions**

As used in and for the purposes of this subchapter—

(a) The term "person" includes an individual, partnership, association, corporation, organization, or any other combination of individuals;

(b) The term "foreign principal" includes—

(1) a government of a foreign country and a foreign political party;

(2) a person outside of the United States, unless it is established that such person is an individual and a citizen of and domiciled within the United States, or that such person is not an individual and is organized under or created by the laws of the United States or of any State or other place subject to the jurisdiction of the United States and has its principal place of business within the United States; and

(3) a partnership, association, corporation, organization, or other combination of persons organized under the laws of or having its principal place of business in a foreign country.

(c) Except<sup>1</sup> as provided in subsection (d) of this section, the term "agent of a foreign principal" means—

(1) any person who acts as an agent, representative, employee, or servant, or any person who acts in any other capacity at the order, request, or under the direction or control, of a foreign principal or of a person any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign principal, and who directly or through any other person—

(I) engages within the United States in political activities for or in the interests of such foreign principal;

(II) acts within the United States as a public relations counsel, publicity agent, information-service employee



or political consultant for or in the interests of such foreign principal;

(iii) within the United States solicits, collects, disburses, or dispenses contributions, loans, money, or other things of value for or in the interest of such foreign principal; or

(iv) within the United States represents the interests of such foreign principal before any agency or official of the Government of the United States; and

(2) any person who agrees, consents, assumes or purports to act as, or who is or holds himself out to be, whether or not pursuant to contractual relationship, an agent of a foreign principal as defined in clause (1) of this subsection.

(d) The term "agent of a foreign principal" does not include any news or press service or association organized under the laws of the United States or of any State or other place subject to the jurisdiction of the United States, or any newspaper, magazine, periodical, or other publication for which there is on file with the United States Postal Service information in compliance with section 3611<sup>2</sup> of Title 39, published in the United States, solely by virtue of any bona fide news or journalistic activities, including the solicitation or acceptance of advertisements, subscriptions, or other compensation therefor, so long as it is at least 80 per centum beneficially owned by, and its officers and directors, if any, are citizens of the United States, and such news or press service or association, newspaper, magazine, periodical, or other publication, is not owned, directed, supervised, controlled, subsidized, or financed, and none of its policies are determined by any foreign principal defined in subsection (b) of this section, or by any agent of a foreign principal required to register under this subchapter;

(e) The term "government of a foreign country" includes any person or group of persons exercising sovereign de facto or de jure political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign de facto or de jure authority or functions are directly or indirectly delegated. Such term shall include any faction or body of insurgents within a country assuming to exercise governmental authority whether such faction or body of insurgents has or has not been recognized by the United States;

(f) The term "foreign political party" includes any organization or any other combination of individuals in a country other than the United States, or any unit or branch thereof, having for an aim or purpose, or which is engaged in any activity devoted in whole or in part to, the establishment, administration, control, or acquisition of administration or control, of a government of a foreign country or a subdivision thereof, or the furtherance or influencing of the political or public interests, policies, or relations of a government of a foreign country or a subdivision thereof;

(g) The term "public-relations counsel" includes any person who engages directly or indirectly in informing, advising, or in any way representing a principal in any public relations matter pertaining to political or public interests, policies, or relations of such principal;

(h) The term "publicity agent" includes any person who engages directly or indirectly in the publication or dissemination of oral, visual, graphic, written, or pictorial information or matter of any kind, including publication by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or otherwise;

(i) The term "information-service employee" includes any person who is engaged in furnishing, disseminating, or publishing accounts, descriptions, information, or data with respect to the political, industrial, employment, economic, social, cultural, or other benefits, advantages, facts, or conditions of any country other than the United States or of any government of a foreign country or of a foreign political party or of a partnership, association, corporation, organization, or other combination of individuals organized under the laws of, or having its principal place of business in, a foreign country;

(j) The term "political propaganda" includes any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American

(p) The term "political consultant" means any person who engages in informing or advising any other person with reference to the domestic or foreign policies of the United States or the political or public interest, policies, or relations of a foreign country or of a foreign political party;

(q) For the purpose of section 613(d) of this title, activities in furtherance of the bona fide commercial, industrial or financial interests of a domestic person engaged in substantial commercial, industrial or financial operations in the United States shall not be deemed to serve predominantly a foreign interest because such activities also benefit the interests of a foreign person engaged in bona fide trade or commerce which is owned or controlled by, or which owns or controls, such domestic person: *Provided*, That (i) such foreign person is not, and such activities are not directly or indirectly supervised, directed, controlled, financed or subsidized in whole or in substantial part by, a government of a foreign country or a foreign political party, (ii) the identity of such foreign person is disclosed to the agency or official of the United States with whom such activities are conducted, and (iii) whenever such foreign person owns or controls such domestic person, such activities are substantially in furtherance of the bona fide commercial, industrial or financial interests of such domestic person.

(June 8, 1938, c. 327, § 1, 52 Stat. 631; Aug. 7, 1939, c. 521, § 1, 53 Stat. 1244; Apr. 29, 1942, c. 263, § 1, 56 Stat. 249; Proc. No. 2695, July 4, 1946, 11 F.R. 7517, 60 Stat. 1352; Sept. 23, 1950, c. 1024, Title I, § 20(a), 64 Stat. 1005; Aug. 1, 1956, c. 849, § 1, 70 Stat. 899; Oct. 4, 1961, Pub. L. 87-366, § 1, 75 Stat. 784; July 4, 1966, Pub. L. 89-486, § 1, 80 Stat. 244; Aug. 12, 1970, Pub. L. 91-375, § 6(k), 84 Stat. 782.)

<sup>1</sup> So in original. Probably should be "Except".

<sup>2</sup> So in original. Probably should be "section 3685".

#### HISTORICAL AND STATUTORY NOTES

##### Revision Notes and Legislative Reports

**1950 Act.** House Report No. 2980 and Conference Report No. 3112, see 1950 U.S.Code Cong. Service, p. 3886.

**1956 Act.** Senate Report No. 2719, see 1956 U.S.Code Cong. and Adm.News, p. 4056.

**1961 Act.** Senate Report No. 1061, see 1961 U.S.Code Cong. and Adm.News, p. 3218.

**1966 Act.** House Report No. 1470 and Conference Report No. 1632, see 1966 U.S.Code Cong. and Adm.News, p. 2397.

**1970 Act.** House Report No. 91-1104 and Conference Report No. 91-1363, see 1970 U.S.Code Cong. and Adm.News p. 3649.

##### References in Text

For definition of Canal Zone, referred to in subsec. (m), see section 3602(b) of this title.

##### Codifications

Words "including the Philippine Islands," were deleted from the definition of the "United States" in subsection (m) pursuant to Proc. No. 2695, which granted independence to the Philippines un-

der the authority of section 1394 of this title, under which section Proc. No. 2695 is set out as a note.

#### Amendments

**1970 Amendment.** Subsec. (d), Pub.L. 91-375 substituted "file with the United States Postal Service information in compliance with section 3611 of Title 39" for "file with the Postmaster General a sworn statement in compliance with section 2 of the Act of August 24, 1912 (37 Stat. 553), as amended".

**1966 Amendment.** Subsec. (b), Pub.L. 89-486, § 1(1), redesignated former pars. (3) and (4) as (2) and (3), substituted in such par. (3) "combination of persons" for "combination of individuals" and eliminated from the definition of "foreign principal" former pars. (2), (5), and (6) which included "(2) an individual affiliated or associated with, or supervised, directed, controlled, financed, or subsidized, in whole or in part, by any foreign principal defined in clause (1) of this subsection"; "(5) a domestic partnership, association, corporation, organization, or other combination of individuals, subsidized directly or indirectly, in whole or in part, by any foreign principal defined in clause (1), (3), or (4) of this subsection"; and "(6) a domestic partnership, association, corporation, or other combination of individuals, supervised, directed, controlled, or financed, in whole or in substantial part, by any foreign government or foreign political party."

Subsec. (c), Pub.L. 89-486, § 1(2), amended provisions generally to redefine "agent of a foreign principal" by specifying four categories of activities creating the agency relationship where person acts as agent, employee, representative, or servant or at the order of, or under the control of, a foreign principal, by requiring a showing not only of foreign connections but also of certain activities performed by the agent for foreign interests, by making change as it relates to problem of indirect control exerted by foreign principals over their agents, by including political activities and actions as political consultant, by excluding attorneys from the relationship, by incorporating provisions of former par. (3) in par. (2) where a person assumes or purports to act as an agent of a foreign principal, and by eliminating the separate category for military or gov-

ernmental officials contained in former par. (4).

Subsec. (d), Pub.L. 89-486, § 1(3), struck out "clause (1), (2), or (4) of" preceding "subsection (b)".

Subsec. (g), Pub.L. 89-486, § 1(4), inserted "public relations" preceding "matter pertaining to" and "of such principal" following "or relations".

Subsecs. (o) to (q), Pub.L. 89-486, § 1(5), added subsecs. (o) to (q).

**1961 Amendment.** Subsec. (b)(6), Pub.L. 87-366 added par. (6).

**1956 Amendment.** Subsec. (c)(5), Act Aug. 1, 1956 repealed par. (5), which included within the definition of "agent of a foreign principal" any person trained in foreign espionage systems with certain exceptions, and is now covered by sections 851 and 852 of Title 50, War and National Defense.

**1950 Amendment.** Subsec. (c)(5), Act Sept. 23, 1950 added par. (5).

**1942 Amendment.** Act Apr. 29, 1942 amended section generally to redefine terms used in this subchapter.

**1939 Amendment.** Act Aug. 7, 1939 amended section generally to redefine terms used in this subchapter.

#### Effective Dates

**1970 Act.** Amendment by Pub.L. 91-375 effective within 1 year after Aug. 12, 1970, on date established therefor by the Board of Governors of the United States Postal Service and published by it in the Federal Register, see § 15(a) of Pub.L. 91-375, set out as a note preceding section 101 of Title 39, Postal Service.

**1966 Act.** Section 9 of Pub.L. 89-486 provided that: "This Act [which enacted sections 219 and 613 of Title 18, Crimes and Criminal Procedure, and amended sections 611 to 616 and 618 of this title] shall take effect ninety days after the date of its enactment [July 4, 1966]."

**1942 Act.** Section 3 of Act Apr. 29, 1942 provided that: "This Act [this subchapter] shall take effect on the sixtieth day after the date of its approval, except that prior to such sixtieth day the Attorney General may make, prescribe, amend, and rescind such rules, regulations, and forms as may be necessary to carry out the provisions of this Act [this subchapter]."

**1938 Act.** Section 7 of Act June 8, 1938 provided that this subchapter shall take effect on the ninetieth day after June 8, 1938.

#### **Transfer of Functions**

Section 2 of Act Apr. 29, 1942 provided that: "Upon the effective date of this Act [see Effective Date of 1942 Amendment note set out under this section], all powers, duties, and functions of the Secretary of State under the Act of June 8, 1938 (52 Stat. 631), as amended [this subchapter], shall be transferred to and become vested in the Attorney General, together with all property, books, records, and unexpended balances of appropriations used by or available to the Secretary of State for carrying out the functions devolving on him under the above-cited Act [this subchapter]. All rules, regulations, and forms which have been issued by the Secretary of State pursuant to the provisions of said Act [this subchapter], and which are in effect, shall continue in effect until modified, superseded, revoked, or repealed."

#### **Separability of Provisions; Effect on Existing Law**

Sections 12 and 13 of Act June 8, 1938, as added by Act Apr. 29, 1942, § 1, provided that:

"Sec. 12. If any provision of this Act [enacting this subchapter], or the application thereof to any person or circumstances, is held invalid, the remainder of

the Act [this subchapter], and the application of such provisions to other persons or circumstances, shall not be affected thereby.

"Sec. 13. This Act [enacting this subchapter] is in addition to and not in substitution for any other existing statute."

#### **Short Title**

**1938 Act.** Section 14 of Act June 8, 1938, as added by Act Apr. 29, 1942, § 1, provided that: "This Act [enacting this subchapter] may be cited as the 'Foreign Agents Registration Act of 1938, as amended'."

#### **Policy and Purpose of Subchapter**

Act Apr. 29, 1942, amending generally Act June 8, 1938, added an opening paragraph preceding § 1 of the latter Act and reading as follows: "It is hereby declared to be the policy and purpose of this Act [enacting this subchapter] to protect the national defense, internal security, and foreign relations of the United States by requiring public disclosure by persons engaging in propaganda activities and other activities for or on behalf of foreign governments, foreign political parties, and other foreign principals so that the Government and the people of the United States may be informed of the identity of such persons and may appraise their statements and actions in the light of their associations and activities."

## **CROSS REFERENCES**

Deportable aliens, see 8 USCA § 1251.

Foreign principal for purposes of contributions by foreign nationals to federal elections, see 2 USCA § 441e.

## **LIBRARY REFERENCES**

#### **American Digest System**

Foreign agents and propagandists, see International Law ¶10.24.

#### **Encyclopedias**

Foreign agents and propagandists, see C.J.S. International Law § 42.

#### **Law Reviews**

Foreign Agents Registration Act: How open should the marketplace of ideas be? Note, 53 Mo.L.Rev. 795 (1988).

Unconstitutional inhibitions: "Political propaganda" and the Foreign Agents Registration Act. Note, 33 N.Y.L.Sch.L.Rev. 345 (1988).

## **WESTLAW ELECTRONIC RESEARCH**

International law cases: 221k [add key number].

See, also, WESTLAW guide following the Explanation pages of this volume.

## NOTES OF DECISIONS

Agency 4  
Constitutionality 1  
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Purpose 2

### 1. Constitutionality

Use of phrase "political propaganda" in Foreign Agents Registration Act, to describe materials subject to Act, does not violate First Amendment rights of citizen desiring to show films so described, though description may be perceived as pejorative by public, where Act poses no obstacle to citizen's access to materials he wishes to exhibit, Act's definition of "political propaganda" is even-handed and neutral, and there is no evidence insufficient to show that public's perceptions about word "propaganda" have actually had any adverse impact on distribution of foreign advocacy materials subject to statutory scheme. *Meese v. Keene*, Cal.1987, 107 S.Ct. 1862, 481 U.S. 465, 95 L.Ed.2d 415.

This subchapter as applied to unincorporated association, did not violate U.S. C.A. Const. Amend. 1, notwithstanding association's allegations that it was unlawfully singled out for prosecution under this subchapter because of hostility to its beliefs and in an attempt to impede and deter it from freely exercising its rights under U.S.C.A. Const. Amend. 1. *Attorney General of U.S. v. Irish Northern Aid Committee*, D.C.N.Y.1981, 530 F.Supp. 241, affirmed 668 F.2d 159.

This subchapter is sufficiently definite to establish and formulate an ascertainable standard of guilt and is not unconstitutional as denying due process of law. *U.S. v. Peace Information Center*, D.C.D.C.1951, 97 F.Supp. 255.

### 2. Purpose

The purpose of this subchapter is to identify agents of foreign principals who might engage in subversive acts or in spreading foreign propaganda, and to require them to make public record of the nature of their employment. *Viereck v.*

*U.S.*, 1943, 63 S.Ct. 561, 318 U.S. 236, 87 L.Ed. 734.

General purpose of this subchapter is to protect security and foreign relations of United States by requiring agents of foreign principals to identify themselves and disclose their activities. *Attorney General of U.S. v. Irish Northern Aid Committee*, D.C.N.Y.1981, 530 F.Supp. 241, affirmed 668 F.2d 159.

Purpose of this subchapter is to protect interests of the United States by requiring complete public disclosure by persons acting for or in interests of foreign principals where their activities are political in nature. *Attorney General v. Irish Northern Aid Committee*, D.C.N.Y. 1972, 346 F.Supp. 1384, affirmed 465 F.2d 1405, certiorari denied 93 S.Ct. 679, 409 U.S. 1080, 34 L.Ed.2d 669.

The purpose of this subchapter is to require all persons who are in the United States for political propaganda purposes to register and supply specified information concerning their activities, employers and contracts in order to publicize the nature of subversive or other similar activities of such foreign propagandists. *U.S. v. Peace Information Center*, D.C.D.C.1951, 97 F.Supp. 255.

This subchapter was designed to bring about disclosure of authorship and source of that appearing in publications and other media of dissemination at instance of foreign governments or foreign factions or parties, as well as to prevent writings of a character seeking to establish a foreign system of government in the United States, or to secure group action of a nature foreign to United States institutions of government. *U.S. v. Kelly*, D.C.D.C.1943, 51 F.Supp. 362.

Congress in enacting this subchapter, requiring the agent of foreign principal who undertakes to disseminate foreign political propaganda in United States to register with the Secretary of State, did not intend to deprive citizens of United States of political information, even if such information should be propaganda of foreign government or foreign principal, but Congress did intend to bring activities of persons engaged in disseminating foreign political propaganda out into the open and to make known the identity of any person engaged in such activities, the source of the propaganda

and who is bearing the expense of its dissemination in the United States. *U.S. v. Auhagen*, D.C.D.C.1941, 39 F.Supp. 590.

### 3. Power of Congress

This subchapter founded on indisputable power of government to conduct its foreign relations and to provide for national defense and so falls within inherent regulatory power of Congress. *Attorney General v. Irish Northern Aid Committee*, D.C.N.Y.1972, 346 F.Supp. 1384, affirmed 465 F.2d 1405, certiorari denied 93 S.Ct. 679, 409 U.S. 1080, 34 L.Ed.2d 669.

The subject matter of this subchapter affecting agents of foreign principals who carry on specified activities in the United States is within the power of Congress under U.S.C.A.Const. Art. I, § 8, to legislate concerning the "national defense". *U.S. v. Peace Information Center*, D.C.D.C.1951, 97 F.Supp. 255.

### 4. Agency

Agency relationship sufficient to require registration as agent of foreign principal need not meet standard of fiduciary relation which results from manifestation of consent by one person to another that other shall act on his behalf and subject to his control, and consent by other to so act; concern is not whether agent can impose liability upon his principal but whether relationship warrants registration by agent to carry out informative practices of this subchapter. *Attorney General of U.S. v. Irish Northern Aid Committee*, C.A.N.Y. 1982, 668 F.2d 159.

The requirement for registration under § 612 of this title is not limited to agencies created by an express contract, but true test is whether agency in fact exists. *U.S. v. German-American Vocational League*, C.A.N.J.1946, 153 F.2d 860, certiorari denied 66 S.Ct. 976, 977, 978, 328 U.S. 833, 834, 90 L.Ed. 1608, 1609, 1610.

### 5. Domestic organization

Where there is concert of action among individuals for furthering interest of a foreign government, they constitute a "domestic organization" within meaning of this subchapter notwithstanding that they are organized by an agent of such government sent here to

establish such organization. *U.S. v. Kelly*, D.C.D.C.1943, 51 F.Supp. 362.

### 6. Intermediary for foreign principal

Fact that registered agent of foreign principal was compelled to register because registered agent was found to have acted at request of foreign principal, alone, was not sufficient to establish that registered agent was an "intermediary" for foreign principal so as to require registration of registered agent's agent as agent of foreign principal. *Attorney General of U.S. v. Irish People, Inc.*, 1986, 796 F.2d 520, 254 U.S.App.D.C. 229.

### 7. Partnership

Section 618 of this title which proscribes payment of fees contingent on success of political lobbying did not render illegal and unenforceable agreements between Italian commercial fishermen and American corporation, which had been designated managing general partner of general partnership established by parties as joint venture, where fishermen held only 25% share in partnership and thus did not exercise control of partnership as compared with 75% share held by American corporation, and where American corporation's position as managing partner kept fishermen from exercising de facto control; this result was not changed by provisions of agreement requiring fishermen to make capital contributions to partnership. *Michele Amoroso Figli v. Fisheries Development Corp.*, D.C.N.Y.1980, 499 F.Supp. 1074.

### 8. Person acting at request of foreign principal

Under this subchapter, surrounding circumstances will normally provide sufficient indication as to whether "request" by foreign principal requires recipient to register as agent. *Attorney General of U.S. v. Irish Northern Aid Committee*, C.A.N.Y.1982, 668 F.2d 159.

### 9. Political propaganda

There is no First Amendment violation in government's branding as "political propaganda" environmental films distributed by one required to register under Foreign Agents Registration Act, on theory that the statutory term "propaganda" goes beyond mere identification of the films as product of a foreign government's efforts to disseminate its

political views and amounts to a constitutionally prohibited governmental pronouncement that the films contain misstatements, half-truths and attempts to mislead; even if the classification constitute an expression of official government disapproval of the ideas in question, neither precedent nor reason justify finding such an expression in itself un-

lawful; disagreeing with *Keene v. Smith*, 569 F.Supp. 1513 (E.D. Cal.), and *Keene v. Meese*, 619 F.Supp. 1111 (E.D.Cal.). *Block v. Meese*, 1986, 793 F.2d 1303, 253 U.S.App.D.C. 317, certiorari denied 106 S.Ct. 3335, 478 U.S. 1021, 92 L.Ed.2d 740, rehearing denied 107 S.Ct. 1989, 481 U.S. 1043, 95 L.Ed.2d 828.



## ***Appendix C***

### **List of some of the Turkish American organizations in United States:**

The American-Turkish Society, inc., for Commerce, Industry and Cultural Understanding, New York.

Federation of Turkish-American Societies, inc., New York

American-Turkish Islamic and Cultural Center, inc., New York

American Turkish Women's Association, New York

Turkish American Physicians Assn., inc., New York

Society of Turkish Architects, Engineers and Scientists in America, New York

Turkish Cypriot Aid Society, Bronx

Karacay Turk's Mosque and Cultural, Inc., New Jersey

Turkish American Friendship Society of the United States, Wilmington, Del

New England Turkish American Cultural Society, inc., Cambridge

Turkish American Cultural Association of Georgia, inc., Atlanta

Turkish American Nurses Association, New York

New Haven American Turkish Association, Wood bridge

Turkish American Cultural Alliance, Skokie

Turkish Mosque and Cultural Center, Munster

Turkish American Cultural Association of Michigan, Union Lake

United Turkish Americans, Wheaton

American Turkish Association, Washington, DC

Maryland American Turkish Association, Baltimore

Washington Turkish Women's Association for the Welfare of Turkish Children, Washington, DC

Turkish Children's Foster Care, Severna Park

Turkish American Federation of Captive Turks Committee, New York

Kıbrıs Türküme Yardım Ocağı, Falls Church

Turkish Democratic Students Association, New York

Turkish Student Association of Leigh University, Bethlehem

Washington Turkish Students Association, Washington, DC

University of Maryland Turkish Students Assn., College Park

Catholic University of American Turkish Student Assn., Washington, DC

Turkish American Association of California, California

Turkish American Association of Milwaukee, inc.

Turkish Cultural Alliance, inc., New York

Turkish Women's League of America inc., New York

Anadolu Club inc., New York

Turkish American Association of Ohio

## Appendix D

### List of Congressman, Congressional and Administrative staff IAI has contacted in 1990:

During the six month period ending on July 11, 1991, IAI contacted, in person and by telephone, the following offices:

<u>Senator/Representative</u>	<u>State</u>	<u>Staffer</u>
<u>1-3 Times</u>		
Gary L. Ackerman	(D-NY)	<u>Lynn Zises</u>
<u>Howard Berman</u>	(D-CA)	
Ben Blaz	(R-Guam)	<u>Joe Pelham</u>
Hank Brown	(R-CO)	<u>Carter Pilcher</u>
Thad Cochran	(R-MS)	<u>Margo Carlisle</u>
Ronald Coleman	(D-TX)	<u>Jose Luis Sanchez</u>
Dennis DeConcini	(D-AZ)	<u>Chip Walgren</u>
Mickey Edwards	(R-OK)	<u>Chris Walker</u>
Eni Faleomavaega	(D-AS)	<u>Salofi Sotoa</u>
Jaime Fuster	(D-PR)	<u>Carmen Delgado Votau</u>
Elton Gallegly	(R-CA)	<u>Jim Turner</u>
Sam Gejdenson	(D-CT)	<u>Andrea Adelman</u>
William F. Goodling	(D-PA)	<u>Rob Green</u>
<u>Porter Goss</u>	(R-FL)	
Amo Houghton	(R-NY)	<u>Mark Dowling</u>
Henry Hyde	(R-IL)	<u>Las Munson</u>
Harry A. Johnston	(D-FL)	<u>Cheryl Federling</u>
Robert Kasten	(R-WI)	<u>Jim Bond</u>
<u>Tom Lantos</u>	(D-CA)	
Jim Leach	(R-IA)	<u>Jim McCormick</u>
Patrick Leahy	(D-VT)	<u>Luke Albee</u>
William Lehman	(D-FL)	<u>Adelle Liskov</u>

Mel Levine	(D-CA)	<u>Dalia Dassa</u>
Bob Livingston	(R-LA)	<u>Dean Sackett</u>
Frank McCloskey	(D-IN)	<u>Paul Weber</u>
Mitch McConnell	(D-KY)	<u>Robin Cleveland-Lewis</u>
Joseph McDade	(R-PA)	<u>John Ormasa</u>
John Miller	(R-OH)	<u>Sam Kaplan</u>
John Myers	(R-IN)	<u>Erik Klos</u>
Daniel Moynihan	(D-NY)	<u>Paula Jacobsen</u>
Frank Murkowski	(R-AK)	<u>Jennifer Brick</u>
Austin Murphy	(D-PA)	<u>Mike Johns</u>
William Orton	(D-UT)	<u>David Saybolt</u>
Donald Payne	(D-NJ)	<u>Frank Kiehna</u>
John Porter	(R-IL)	<u>Gus Gustafson</u>
Charles Robb	(D-VA)	<u>Peter Cleveland</u>
Ileana Ros-Lehtinen	(R-FL)	<u>Mauricio Tamarco</u>
Toby Roth	(R-WI)	<u>Ed Rice</u>
Thomas C. Sawyer	(D-OH)	<u>Jason Duncan</u>
Christopher Smith	(R-NJ)	<u>Mary McDermott</u>
Neal Smith	(D-IA)	<u>Park Rinard</u>
Robert G. Torricelli	(D-NJ)	<u>Dan Cline</u>
Morris Udall	(D-AZ)	<u>Matt Collins</u>
<u>Mike Van Dusen</u> , Staff Dir. of Europe and Middle East Subcommittee, HFAC		
<u>Malcolm Wallop</u>	(R-WY)	
John Warner	(R-VA)	<u>Judy Ansley</u>
Jamie L. Whitten	(D-MS)	<u>Howard DeCell</u>

4-7 Times

<u>Robert Lagomarsino</u>	(R-CA)	<u>Matt Reynolds</u>
<u>Lawrence Smith</u>	(D-FL)	<u>Tom Pines</u>
<u>Charles Wilson</u>	(D-TX)	<u>D'Anna Tindal</u>

Regularly

<u>Dan Burton</u>	(R-IN)	<u>Scott Feeney</u>
<u>Ben Gilman</u>	(R-NY)	<u>Russell Wilson</u>
<u>Peter Kostmayer</u>	(D-PA)	<u>Rich Glick</u>
<u>Jan Meyers</u>	(R-KS)	<u>Jonathan Fellows</u>
<u>Steven Solarz</u>	(D-NY)	<u>Stanley Roth</u>

Underlined are those contacted by IAI.

### Executive Branch Contacts

IAI contacted the members of the Executive Branch of the United States Government listed below by telephone, correspondence, and in person from one to three times between January 11, 1991 and July 11, 1991 in support of:

- o Full security assistance and all-grant authorization for Turkey meeting U.S. Administration requests within H.R. 2508 (the House Foreign Aid Authorization Bill).
- o Full security assistance and all-grant authorization for Turkey meeting U.S. Administration requests within S.1435 (the Senate Foreign Assistance Authorization Bill).
- o Full security assistance and all-grant appropriations for Turkey meeting U.S. Administration requests within H.R. 2621 (the House Appropriations Bill).
- o Full provision of emergency supplemental aid for Turkey (H.R. 1281) as requested by the Administration.
- o Provision of advanced defense systems, military war reserve stocks and transfer of excess defense materiel

Col. Pat Aquino, Office of the Deputy Under Secretary of Defense for International Programs, Department of Defense.

Susan Ludlow-MacMurray, Office of General Counsel, Department of Defense.

LTC. Jerry Milam, Office of the Deputy Chief of Staff for Plans and Operations, USAF, Department of Defense.

Karl Pfaffarkorn, Conventional Forces and Armed Control Policy, International Security Policy, Department of Defense.

LTC. William Diehl, Joint U.S. Military Mission for Aid to Ankara, Turkey, Department of Defense.

Bob Bauerlein, Director, Deputy Secretary's Office for Planning and Resources, Department of State.

Henry Rowen, Assistant Secretary of Defense for International Security Affairs, Department of Defense.

George Bader, Principal Director, European-NATO Policy, International Security Policy, Department of Defense.

B.J. Certain, Chief Legislative Liaison, Defense Security Assistance Agency, Department of Defense.

Clarence Juhl, Acting Chief, NATO Policy, International Security Policy, Department of Defense.

Kathy Fuster, Office of the Vice President, The White House.

Janet Mullins, Assistant Secretary of State for Congressional Affairs.

Leon Pfeiffer, Policy Analyst, EUR-NATO Policy, ISP, Department of Defense.

Robert Bradtke, European Affairs, Congressional Affairs, Department of State.

IAI contacted the members of the Executive Branch of the United States Government listed below by telephone, correspondence and in person from four to seven times between January 11, 1991 and July 11, 1991 in support of:

- o Full security assistance and all-grant authorization for Turkey meeting U.S. Administration requests within H.R. 2508 (the House Foreign Aid Authorization Bill).
- o Full security assistance and all-grant authorization for Turkey meeting U.S. Administration requests within S.1435 (the Senate Foreign Assistance Authorization Bill).
- o Full security assistance and all-grant appropriations for Turkey meeting U.S. Administration requests within H.R. 2621 (the House Appropriations Bill).
- o Full provision of emergency supplemental aid for Turkey (H.R. 1281) as requested by the Administration.
- o Provision of advanced defense systems, military war reserve stocks and transfer of excess defense materiel under existing legislation/surplus defense materiel

under provisions of the Conventional Forces of Europe Treaty for Turkey.

Reginald Bartholomew, Under Secretary of State for International Security Affairs.  
Robert Kimmitt, Under Secretary of State for Political Affairs.  
Steve Hadley, Assistant Secretary of Defense, International Security Policy, Department of Defense.  
J.D. Crouch, Principal Deputy, Assistant Secretary of Defense, International Security Policy, Department of Defense.  
Peter Flory, Special Assistant to Assistant Secretary of Defense/ISP, Department of Defense.  
LTC Carla Stucki, Director of Legislative Liaison, Defense Security Assistance Agency, Department of Defense.  
Andrew Goldman, Special Assistant for International Security Policy, Legislative Affairs, Department of Defense.  
Nick Burns, European Political Military Affairs, National Security Council.  
David Ransom, Director, Southern European Affairs, Department of State.  
Dick Clarke, Assistant Secretary of State for Political/Military Affairs, Department of State.  
Paul Wolfowitz, Under Secretary of Defense for Policy, Department of Defense.  
Glenn Rudd, Deputy Director, Defense Security Assistance Agency, Department of Defense.  
Carnes Lord, Office of the Vice President, The White House.  
Mort Dworkin, Office of Under Secretary of State for International Security Affairs, Department of State.  
Darel Johnson, Director, European Policy, International Security Policy, Department of Defense.  
Steve Barry, Deputy Assistant Secretary of State for Congressional Affairs.  
Mort Abramowitz, U.S. Ambassador to Turkey.  
Marc Grossman, Deputy Chief of Mission, U.S. Embassy, Turkey.  
RADM Scott Redd, Military Assistant to Undersecretary of Defense, for Policy, Department of Defense.

IAI contacted the members of the Executive Branch of the United States Government listed below by telephone, correspondence and in person regularly and frequently between January 11, 1991 and July 11, 1991 in support of:

- o Full security assistance and all-grant authorization for Turkey meeting U.S. Administration requests within H.R. 2508 (the House Foreign Aid Authorization Bill).
- o Full security assistance and all-grant authorization for Turkey meeting U.S. Administration requests within S.1435 (the Senate Foreign Assistance Authorization Bill).



## **Appendix E**

### **Examples of claims made by Armenians and Greeks against Turkey**

E.1.

#### **HUMAN RIGHTS**

##### **Protest Will Mark Turkey's Oppression of Minorities**

LOS ANGELES - On the occasion of the twentieth anniversary of the Turkish occupation of Cyprus, a demonstration has been organized by the Hellenic American Council. The site of the demonstration which is slated for July 24, at 2 P.M. will be the Federal Building in Westwood [corner of Veteran and Wilshire Blvd.].

Also participating will be representatives of the Armenian American and Kurdish American Communities. "Armenians, Greeks and Kurds share a common experience with the Turkish State, " remarked in ANC spokesperson. "The Armenian Genocide and the current blockade of Armenia along with so many actions against humanity, have profoundly defined Turkey as a state which sponsors mass murder and state sponsored terrorism, " the spokesperson added.

It was on July 20, 1974 that Turkey invaded the island nation of Cyprus and 20 years later its troops occupy 40 percent of the island. Thousands of Greek Cypriots and five U.S. citizens are still missing and unaccounted for over the years Turkey has partitioned the island and has taken systematic steps to eradicate all signs of Greek Cypriot culture on the occupied territory. This policy of uprooting villages is strongly reminiscent of Turkey's past and continuing efforts to erase all signs of Armenian culture and history from Western Armenia.

The event is being organized in cooperation with the ANKA - WR, the Federation of Hellenic American of Southern California and the Armenian Youth Federation.

Appendix E.2.

# Armenian National Committee of America

1901 Pennsylvania Ave., NW, Suite 206. Washington, DC, 20006 • Tel. (202) 775-1918 • Fax (202) 775-5648

## PRESS RELEASE

For Immediate Release  
April 20, 1994

Contact: Elizabeth S. Chouldjian  
Tel: (202) 775-1918

### MORE THAN 80 SENATORS AND REPRESENTATIVES COMMEMORATE ARMENIAN GENOCIDE

Washington, DC - Senator Edward Kennedy (D-MA) and Representative Richard Lehman (D-CA) were joined yesterday by a large and diverse group of lawmakers, representing nearly every region of the country, in commemorating the Armenian Genocide, reported the Armenian National Committee of America (ANCA).

Over 80 Members took part in separate commemorations in the Senate and House. The total number of Senators and Representatives who will speak out on the Genocide is expected to increase in the days approaching April 24th. Among those who spoke were members of the Senate and House leadership, key committee chairmen and influential members of committees dealing with foreign affairs.

"The participation of such a large bipartisan group of Members from across the country underscores the contemporary relevance of the Armenian Genocide," said Aram Hamparian, Executive Director of the ANCA. "The Armenian Genocide is an important human rights issue which clearly continues to demand the attention of our elected officials," he added.

Senator Kennedy, who was joined in organizing the Senate commemorations by Senators Robert Dole (R-KS) and Donald Riegle (D-MI), spoke of the need to honor the "courage and the memory of the one and a half million Armenian men, women, and children who perished." He added that "the bravery with which the Armenians bore this tragedy is a timeless tribute to their enduring faith. In recognition of their remarkable courage, I have strongly supported efforts to make April 24 a National Day of Remembrance."

"Today the Senate honors the memory of the one and one half million Armenians murdered between 1915 and 1923," said Senate Majority Leader George Mitchell, in his remarks on the Senate floor. He explained that the Senate pauses each year "to reflect on this heinous crime and remember it with the hope that no future generation will be subjected to such a cruel fate."

Senate Minority Leader Robert Dole echoed these remarks, noting that "as we commemorate the victims of the Armenian Genocide, we must also remember that some would like to repeat the horrors of the past." He continued, stating "The United States must stand with the brave and long-suffering Armenian people, work for lasting peace in the Caucasus, and never forget the Armenian Genocide."

The commemoration in the House took the form of a Special Order, organized by Reps. Lehman and Anna Eshoo (D-CA). Rep. Lehman, in his remarks, reminded his colleagues that "the Armenian Genocide was a terrible page in our world's history but that we, as a society, must never forget the atrocities of the past." He described the continued denial of the Armenian Genocide as "just another ploy by the Turkish

government" and went on to state that "the time has come for the U.S. to tell Turkey enough is enough."

"As the only member of Congress of Armenian descent, I know full well how the Ottoman Empire decimated our people and wrote one of the darkest chapters in human history," said Rep. Eshoo. "This week, Armenians around the world raise their voices as one and declare that what took place 79 years ago should not and cannot be forgotten."

House Majority Whip David Bonior (D-MI) impressed upon his colleagues that Congressional commemorations of the Genocide were particularly necessary "because Turkey, after all these years, refuses to acknowledge these terrible deeds . . . If we are to stop this madness from repeating itself, we must never allow those who would cover up the Armenian Genocide, or any other genocide, to succeed. And they never will succeed, as long as we continue to gather and remember the Armenian Genocide."

Among those who participated in the Senate commemoration were George Mitchell (D-ME), Majority Leader; Dennis DeConcini (D-AZ), Chairman of the Select Committee on Intelligence; Paul Sarbanes (D-MD), Chairman of the Foreign Relations Subcommittee on International Economic Policy; Christopher Dodd (D-CT), Chairman of the Foreign Relations Subcommittee on Western Hemisphere; Paul Simon, Chairman of the Foreign Relations Subcommittee on African Affairs; James Jeffords (R-VT), Member of the Committee on Foreign Relations; Alfonse D'Amato (R-NY), Chairman of the CSCE; Russell Feingold (D-WI), Member of the Committee on Foreign Relations; Frank Lautenberg (D-NJ); Carl Levin (D-MI); Joseph Lieberman (D-CT); John Glenn (D-OH); Barbara Boxer (D-CA); and Bill Bradley (D-NJ).

House members who participated in the Special Order included Majority Whip David Bonior (D-MI); Ronald Dellums (D-CA), Chairman of the Armed Services Committee; John Dingell (D-MI), Chairman of the Energy and Commerce Committee; William Ford (D-MI), Chairman of the Committee on Education and Labor; John Moakley (D-MA), Chairman of the Committee on Rules; Vic Fazio (D-CA), Chairman of the House Democratic Campaign Committee; Steny Hoyer (D-MD), Chairman of the CSCE; Benjamin Gilman (R-NY), Ranking Republican on the Foreign Affairs Committee; Carlos Moorhead (R-CA), Ranking Republican on the Committee on Energy and Commerce; Gary Ackerman (D-NY), Chairman of the Foreign Affairs Subcommittee on Asia and the Pacific; Howard Berman (D-CA), Chairman of the Foreign Affairs Subcommittee on International Operations; Sam Gejdensen (D-CT), Chairman of the Foreign Affairs Subcommittee on Economic Policy; Robert Torricelli (D-NJ), Chairman of the Subcommittee on Western Hemisphere Affairs; Elton Gallegly, Member of the Foreign Affairs Committee; Christopher Smith (R-NJ), Member of the Committee on Foreign Affairs; David Levy (R-NY), Member of the Committee on Foreign Affairs; Matthew Martinez (D-CA), Member of the Committee on Foreign Affairs; Dana Rohrabacher (R-CA), Member of the Committee on Foreign Affairs; Robert Andrews (D-NJ), Member of the Committee on Foreign Affairs; Bill Baker (R-CA); Peter Barca (D-WI); Xavier Becerra (D-CA); James Bilbray (D-NV); Michael Bilirakis (R-FL); Thomas Bliley, Jr. (R-VA); Peter Blute (D-MA); Ken Calvert (R-CA); Benjamin Cardin (D-MD); Gary Condit (D-CA); Jerry Costello (D-IL); Calvin Dooley (D-CA); Barney Frank (D-MA); Bob Franks (R-NJ); Dennis Hastert (R-IL); Maurice Hinchey (D-NY); Joseph Kennedy, II (D-MA); Dale Kildee (D-MI); Peter King (R-NY); Sander Levin (D-MI); Jerry Lewis (R-CA); Nita Lowey (D-NY); Carolyn Maloney (D-NY); Thomas Manton (D-NY); Michael McNulty (D-NY); Martin Meehan (D-MA); Constance Morella (R-MD); Frank Pallone (D-NJ); Nancy Pelosi (D-CA); John Porter (R-IL); Marge Roukema (R-NJ); Karen Shepherd (D-UT); Bill Thomas (R-CA); Karen Thurman (D-FL); Esteban Torres (D-CA); Edolphus Towns (D-NY); James Traficant (D-OH); Peter Visclosky (D-IN); James Walsh (R-NY); Henry Waxman (D-CA); Frank Wolf (R-VA); John Oliver (D-MA); Bobby Rush (D-IL); Leslie Byrne (D-VA); and Lynn Woolsey (D-CA).

The opening prayer in the House of Representatives on the morning of the Special Order was offered by the Primate of the Diocese of the Armenian Church, Khajag Barsamian.

# Armenian National Committee of America

11 Pennsylvania Ave., NW, Suite 206, Washington, DC 20006 (202) 775-1918 fax (202) 775-5648

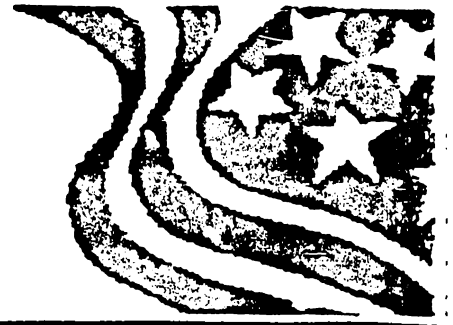
**To:** Bob Brauer, Rep. Dellums  
**From:** Chris Hekimian  
**Re:** Armenian Genocide Commemoration on April 19th  
**Date:** April 11, 1994

**Attached please find a reminder to participate in the upcoming commemoration of the Armenian Genocide.**

**You can participate in the commemoration by taking part in the Special Order on Tuesday, April 19th, sponsored by Rep. Richard Lehman, or by submitting a statement for the Congressional Record.**

**To participate, contact Mike Moore in Rep. Lehman's office at 225-4540.**

# The Armenian Genocide Will Be Commemorated In Congress On April 19th



On April 19th, members of the U.S. Congress will commemorate the 79th anniversary of the Armenian Genocide. Please contact Mike Moore in Rep. Lehman's office to arrange to participate in the commemoration by speaking on the House floor or by submitting a statement for the Congressional Record.

○	The Armenian Genocide
	Basic Facts
	<ul style="list-style-type: none"> <li>● Between 1915 and 1923, a systematic and deliberate campaign of genocide by the Ottoman Turkish government resulted in the deaths of over 1.5 million Armenians and the exile of a nation from its historic homeland.</li> </ul>
○	<ul style="list-style-type: none"> <li>● On April 24th, 1915 the Armenian leadership in Istanbul and other Armenian centers was executed; the male population, already conscripted into the Ottoman Army, was disarmed, placed in work battalions, and gradually executed. The surviving women, children and elderly were sent on death marches through the desert.</li> </ul>
○	<ul style="list-style-type: none"> <li>● U.S. Ambassador to Turkey Henry Morgenthau said: "When the Turkish authorities gave the orders for these deportations, they were giving the death warrant to a whole race; they understood this well, and in the conversations with me, they made no particular attempt to conceal the fact."</li> </ul>

## To Participate:

Contact Mike Moore  
in Rep. Lehman's  
office (x5-4540)

## For More Information:

Contact the  
Armenian National  
Committee  
of America at  
(202) 775-1918

The ANCA will inform the Armenian American community about your participation in this commemoration through ANCA Congressional report cards, election guides, newspapers, and direct mail.

## Appendix F

# ATFC CORPORATE MEMBERSHIP

*As Of*  
*December 31, 1992*  
*(151 Members)*

### *Golden Horn Club*

CERRAHOĞULLARI T.A.Ş.  
DIGITAL EQUIPMENT CORPORATION  
FMC CORPORATION  
GAMA ENDUSTRI TESISLERI  
GENERAL DYNAMICS CORPORATION  
GENERAL ELECTRIC  
KOÇ HOLDING  
LORAL-VOUGHT SYSTEMS CORPORATION  
MADSAK FOREIGN TRADE  
MARTIN MARIETTA INTERNATIONAL  
RAYTHEON COMPANY  
T.C. ZIRAAT BANKASI  
TEXAS INSTRUMENTS, INC.  
TEXTRON, INC.  
TÜRK EKONOMİ BANKASI  
UNITED TECHNOLOGIES CORPORATION

### *Bosphorus Club*

AMR-AMR CONSULTING GROUP  
ANTMARIN SHIPPING-TOURISM-TRADING  
ARNOLD & PORTER  
ARTHUR ANDERSEN  
WORLDWIDE ORGANIZATION  
AT&T  
BANKERS TRUST COMPANY  
BROWN & ROOT DEVELOPMENT, INC.  
BURÇ ELECTRONICS  
CITIBANK, N.A.  
COLLIER ASSOCIATES INTERNATIONAL  
COMSAT  
DEGERE ENTERPRISES  
DELTA AIRLINES  
ECZACIBAŞI HOLDING, A.Ş.  
ENKA HOLDING INVESTMENT CO.  
FAIRCHILD CORPORATION  
FOSTER WHEELER CONSTRUCTORS, INC.  
HARRIS CORPORATION  
HASAT FOREIGN TRADE  
ITT SHERATON CORPORATION  
JOHN/AYLIN MCCARTHY  
LOCKHEED CORPORATION INTERNATIONAL  
MOBIL OIL TÜRK A.Ş.  
PROFILO HOLDING  
RIGGS NATIONAL BANK  
SIERRA TECHNOLOGIES, INC.  
THE BOEING COMPANY  
THE COCA-COLA CO.  
THE GOODYEAR TIRE AND RUBBER CO.  
TRW  
TURKISH AIRLINES  
TURKVEST CORPORATION  
TÜYAP FAIRS & EXHIBITIONS  
WESTINGHOUSE ELECTRIC CORPORATION  
WHITE & CASE  
WORLD TRADE CENTER-WASHINGTON, D.C.

AAI CORPORATION  
ABBOTT LABORATORIES  
AEROMAR INTERNATIONAL, LTD.  
AIRWAVES, INC.  
ALESA  
ALLIANT TECHSYSTEMS, INC.  
ALLIED-SIGNAL AEROSPACE  
ALTAY KOLLEKTIF SIRKETI  
A.M. GENERAL CORPORATION  
AMERICAN BORATE COMPANY  
AMERICAN EXPRESS BANK, LTD.  
AMERICAN HOSPITAL OF INSTANBUL  
AMERICAN INTERNATIONAL UNDERWRITERS  
AMERICAN TURKISH SOCIETY, INC.  
ANADOL RUG COMPANY  
AREOPAG MINNESOTA, INC.  
ARTEMEL & ASSOCIATES  
ATLANTIC RECORDING CORPORATION  
BALSU GIDA SAN. A.Ş.  
BATH IRON WORKS CORPORATION  
BILAR, BELGI ARAÇLARI, A.Ş.  
BLACK SEA TRADING GROUP  
BMY  
BRUNSWICK TECHNICAL GROUP  
BUCHART-HORN  
BURLA MAKINA TIC. VE YAT.  
CADILLAC GAGE TEXTRON  
CAE-LINK CORPORATION  
CANNON  
CAPITOLINE INTERNATIONAL GROUP  
COMPUTER VISITS, INC.  
CORESTATES-PHIL. NATIONAL BANK  
CUMMINS ENGINE COMPANY  
CYPRESS INTERNATIONAL  
DILLINGHAM CONSTRUCTION  
DOW CORNING CORPORATION  
E-SYSTEMS, INC.  
EBASCO SERVICES, INC.  
EMIT - ERIMTAN CONSULTING  
EQUIPMENT & PARTS EXPORT  
FAIRCHILD DEFENSE  
GCI GROUP  
GENERAL MOTORS CORPORATION  
GREAT CIRCLE DEVELOPMENT  
HILL INDUSTRIES  
HILL & KNOWLTON  
HONEYWELL, INC.  
HUGHES AIRCRAFT COMPANY  
IMO INDUSTRIES, INC.  
IMPEN BANK

INTERBANK  
INTERGRAPH  
INTERNATIONAL ADVISERS, INC.  
IBS RESEARCH AND CONSULTANCY  
INTERNATIONAL STEEL  
ITT GILGILLAN  
KALE MICROPHASE  
KIRK VOICH GIST, INC.  
KOÇ AMERIKAN BANK  
LORAL AERONUTRONIC  
LYKES BROS. STEAMSHIP CO.  
MCAULIFFE, KELLY, RAFFAELLI & SIEMENS  
MICROPHASE CORPORATION  
MILLER, CANFIELD, PADDOCK & STONE  
MINPROC CORPORATION  
MOTOROLA, INC.  
MULTILATERAL FUNDING INTERNATIONAL  
NEWPORT NEWS SHIPBUILDING  
OGE & COMPANY, INC.  
OPALIT CO., LTD.  
OVERSEAS DEVELOPMENT CORPORATION  
OWENS-CORNING FIBERGLASS CORPORATION  
PARSONS BRINCKERHOFF INTERNATIONAL  
PROCUREMENT ASSISTANCE CORPORATION  
ROBERT LONG PRODUCTIONS  
ROCKWELL INTERNATIONAL  
RYLAND, RYLAND TRADING LTD.  
SCIENCE APPLICATIONS INTERNATIONAL  
SMISLOVA, KEHNEMUI & ASSOCIATES  
SYSTEMS RESEARCH LABORATORIES  
TDI, INC.  
TECHNOLOGY & PLANNING ASSOCIATES  
TEKSIS CORPORATION  
TELEDYNE CONTINENTAL MOTORS  
THE CHASE MANHATTAN BANK N.A.  
THOMPSON & COMPANY  
TOBACCO TECHNOLOGY, INC.  
TRADEWAYS, LTD.  
TRINITY PARTNERS INTERNATIONAL  
TRITON SYSTEMS CORPORATION  
TÜRK BOSTON BANK  
TÜRK EKSPRES TRAVEL AGENCY  
TURKISH CARGO LINES  
TÜRKİYE GARANTİ BANKASI  
TUSAŞ AEROSPACE INDUSTRIES  
ÜÇGEN A.Ş.  
UMRAN ÇELİK BORU SANAYİ A.Ş.  
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