Foreign Lobbying in the US Congress: Evidence from Free Trade Agreements*

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Abstract

Foreign entities are one of the most active interest groups that lobby policymakers in the US government. There is a long history of concern about foreign powers trying to influence public opinion and government policies in the United States but little is known about the scope and magnitude of their influence. Using a novel dataset constructed from foreign lobbying reports, I analyze lobbying activities by the governments of South Korea, Colombia, and Panama over ten years (2003 - 2012) regarding their respective free trade agreements. I find that lobbyists on behalf of foreign countries target different groups of legislators, regarding both their opinions on free trade and institutional positions, between the agenda-setting and voting stages. I also find that lobbying contacts have a significant effect on voting outcomes in the House.

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1 Introduction

In September 2014, *The New York Times* published a special report on the influence of foreign money on US think tanks.[1] According to the article, the Brookings Institution has received more than $41 million in recent years from governments of foreign countries including Qatar, the United Arab Emirates (UAE), and Norway. The Brookings Institution was not an exception. Many other prominent Washington think tanks received between 5 and 20% of their annual budgets from foreign entities. The question of who influences US foreign policy, in both the security and economic realms, has drawn much attention among the media, general public, and scholars (Grossman and Helpman 1994; Jacobs and Page 2005; Mearsheimer and Walt 2007; Nye Jr. et.al 2012). Recent media reports about foreign funding to the prominent US think tanks, as well as a series of media coverage on Russia's involvement in the 2016 US presidential elections, has brought foreign entities to the center of the public's attention.

There is a long history of concern about foreign powers attempting to influence public opinion and government policies in the United States. In 1938, Nazi organizations spent considerable money to influence US political debates and this resulted in Congress passing the Foreign Agents Registration Act (FARA). The FARA provides a legal channel for foreign governments and businesses to lobby the US government and to influence US public opinion (Waters 1988; Atieh 2010; Gawande, Maloney, and Montes-Rojas 2009). Since then, foreign entities have been actively involved in lobbying policymakers in the US.

What distinguishes the FARA from the Lobbying Disclosure Act (LDA), legislation that regulates domestic lobbying activities, is the scope of its disclosure requirements. The FARA requires that lobbyists representing foreign entities, usually US lobbying firms, submit semi-annual reports detailing all lobbying contacts - including information on who, when, why, and how those contacts were made - along with information on payments made by foreign entities to lobbying firms. The lobbying contact data includes not only contacts to members of Congress, but also contacts to bu-

[1] Eric Lipton, Brooke Williams, and Nicholas Confessore, "Foreign Powers Buy Influence at Think Tanks," *The New York Times*, September 6, 2014.

reaucrats in the executive branches and to personnel in the media and think tanks. This rich set of information allows me to measure the intensity of lobbying to each policymaker over time.

In this paper, I study the influence of foreign lobbying in the US Congress using new data constructed from the lobbying reports mandated by the FARA. In particular, I focus on the activities that the governments of South Korea, Colombia, and Panama undertook to lobby the United States government regarding their respective free trade agreements (FTAs). I follow their lobbying activities on FTAs from the 108th Congress (2003-2004) to the 112th Congress (2011-2012). Hence, I am able to follow a policy issue and the relevant lobbying activities for almost a decade - from the beginning to the end of a policy enactment process. I collected detailed information for over 5,800 individual contacts that lobbyists made with policymakers, including legislators, their staffers, and government officials at executive agencies such as the Office of the United States Trade Representative.

There are two reasons I focus on lobbying activities by South Korea, Colombia, and Panama to promote FTAs with the US. First, unlike the majority of foreign government lobbying that does not target a specific piece of legislation, lobbying activities by the governments of South Korea, Colombia, and Panama regarding free trade agreements with the US can be directly linked to roll-call voting on the ratification of each treaty in the Congress. Second, for scholars who are interested in estimating the effect of interest groups on policy outcomes, trade policy has been one of the most studied areas (Bailey and Brady 1998; Goldberg and Maggi 1999; Baldwin and Magee 2000a; Gawande and Bandyopadhyay 2000; Fordham and McKweon 2003; Gawande and Hoekman 2006; Gawande, Krishna, and Robbins 2006; Stoyanov 2009; Ludema, Mayda, and Mishra 2015). While there is abundant research about the influence of special interest groups on trade policy, little attention has been paid to foreign governments as special interests in the politics of trade, despite their active roles (Grossman and Helpman 1995). My goal is to shed light on the role of foreign governments in trade policymaking in the US.

Based on the FARA dataset, I first conduct an analysis focusing on whom the lobbyists contacted, and, if they lobbied a policymaker, when and how they contacted her/him. Examining the identities of the legislators who are targeted by lobbyists is important in itself, but a lack of comprehensive lobbying contact information limits this exercise (Wright 1989, 1990; Hojnacki and Kimball 1998, 1999). The detailed lobbying contact information in FARA reports allows me to overcome this limitation as well as measure the intensity of the targeting as legislation advances. To systematically analyze how lobbying contacts change over time, I divide the period of study into two stages for each of the three trade agreements: one stage for determining the content of the trade agreement, which I call the "*agenda-setting stage*"; the other stage for determining the fate of the agreement via votes, which I call the "*voting stage*." The point at which the two stages are divided is when the *final* trade agreement was signed by the executive branches in each country's government.

My analysis yields four findings concerning which legislators are targeted and when. First, a large fraction of total lobbying activities on each trade agreement occurred during the agenda-setting period, while lobbying intensity, as measured by per-day expenditures and contact frequency, is much higher during the voting stage. Second, more powerful legislators, defined as those who are either committee chairs or party leaders, are more likely to be contacted during both stages. Third, staunch opponents of the trade agreements, measured by previous voting records on trade bills, are lobbied in both stages, and the intensity of lobbying towards these opponents tends to decrease in the voting stage relative to the agenda-setting stage. Lastly, electorally vulnerable legislators are lobbied more heavily during the voting stage than in the agenda-setting stage. These patterns indicate that lobbying strategies about whom to target vary as legislation advances in Congress.

Next, I examine whether lobbying contacts on behalf of foreign governments influence legislators' votes. The lack of comprehensive lobbying contact information also significantly limits scholars' endeavors to identify the effect of lobbying on the behavior of legislators. While several existing studies identify the impact of lobbying spending on various policy outcomes (de Figueiredo and Silverman 2006; Baumgartner et al. 2009; Richter, Samphantharak, and Timmons 2009; Kang 2016; Goldstein and You 2017), it has been difficult to observe how lobbying contacts change the voting behavior of legislators.[2] Assessing the impact of lobbying on voting behavior is challenging even with comprehensive contact data because lobbying decisions about who to target are not random.

To address this selection bias, I use lobbying contacts by foreign countries other than Colombia, Panama, and South Korea on non-trade issues in years before voting on free trade agreements as an instrumental variable. A legislator may learn that meeting with a lobbyist on behalf of other foreign countries is actually useful in gathering policy-relevant information. Therefore, she may be more willing to give access to a lobbyist who represented either Colombia, or Panama, or South Korea. However, other countries' contacts in the years before voting on FTAs on non-trade issues may not have any direct influence on voting on FTA legislation in 2012. By exploiting the information on contact intensity at each member level from the FARA reports, and by employing instrumental variable analysis to address endogeneity, I find that lobbying contacts have a significant effect on members in the House of Representatives on their votings on Panama and Korea FTA bills.

Although I employ foreign lobbying contact data to understand lobbying resource allocation and the relationship between lobbying and voting, the results presented in this paper can be generalized to understand the broader lobbying process. Half of the lobbying firms hired by foreign governments in the sample also represented domestic clients; and these 14 firms, combined, had over 10% of the total shares in the domestic lobbying industry and represented 1,515 domestic clients during the period between 2008 through 2010.[3] Also, 72% of total contacts and 78% of total congressional contacts made on behalf of the governments of Colombia, Panama, and South Korea were conducted through those 14 firms. These findings suggest that the conclusions from this study can have general implications for the lobbying process.

[2] Wright (1989, 1990) attempted to compare the effect of campaign contributions and lobbying on legislators' roll-call voting by using lobbying contact data from interviews with lobbyists. Unlike campaign contributions, domestic lobbying reports do not distinguish how each interest group target specific legislators. This limitation explains why there is a dearth of empirical literature on lobbying's influence on individual legislator's roll-call voting.

[3] Calculations were made by the author based on the data compiled by The Center for Responsible Politics (opensecrets.org). Top lobbying firms, measured by total revenues in the domestic lobbying market (https://www.opensecrets.org/lobby/top.php?indexType=l), such as Patton Boggs LLP or Akin, Gump et al. are active intermediaries in the foreign lobbying market.

2 Foreign Influence and Lobbying on Trade Policy

Foreign countries and other entities have regular diplomatic relationships with the US government through official channels such as their embassies in Washington, DC. However, many foreign entities also have used non-governmental channels by hiring "agents" who represent their interests via various types of lobbying. The FARA requires that foreign entities hire agents based in the US if they engage in lobbying, and those hired agents are mandated to submit semi-annual lobbying disclosure forms. There are two types of agents: in-house agents and contracted agents. In-house agents are usually organizations from foreign countries that are based in Washington, DC so they can manage their US offices and monitoring daily activities in US institutions. Examples include the Korea Economic Institute of America, the Austrian Tourism Office, and the India Trade Promotion Organization. Contracted agents are usually US lobbying firms, law firms, or media consulting firms that provide their expertise during a given period for specific issues. Some foreign entities hire only one type of agent while others hire both types.

When first implemented, the FARA required agents of foreign entities engaged in publishing "political propaganda" to register and disclose their activities, but it did not regulate political donations by foreign entities. In 1966, after congressional hearings in 1962-1963 revealed campaign contributions to federal candidates by Philippine sugar producers and agents of Nicaraguan president Luis Somoza, Congress moved to prohibit political contributions in any US election by any foreign government, political party, corporation, or individual (Powell 1996; Brown 1997; Gawande, Krishna, and Robbins 2006). A series of attempts by foreign entities to influence US politics and policy-making processes caused legislators to make the FARA requirement more comprehensive; these thorough requirements contrast with the requirements for domestic lobbying activities and make the FARA data more valuable.

How large is the scope of foreign lobbying activities? Since May 2007, the Department of Justice (DOJ) has maintained a website that posts image files of FARA disclosure reports.[4] The

[4] www.fara.gov

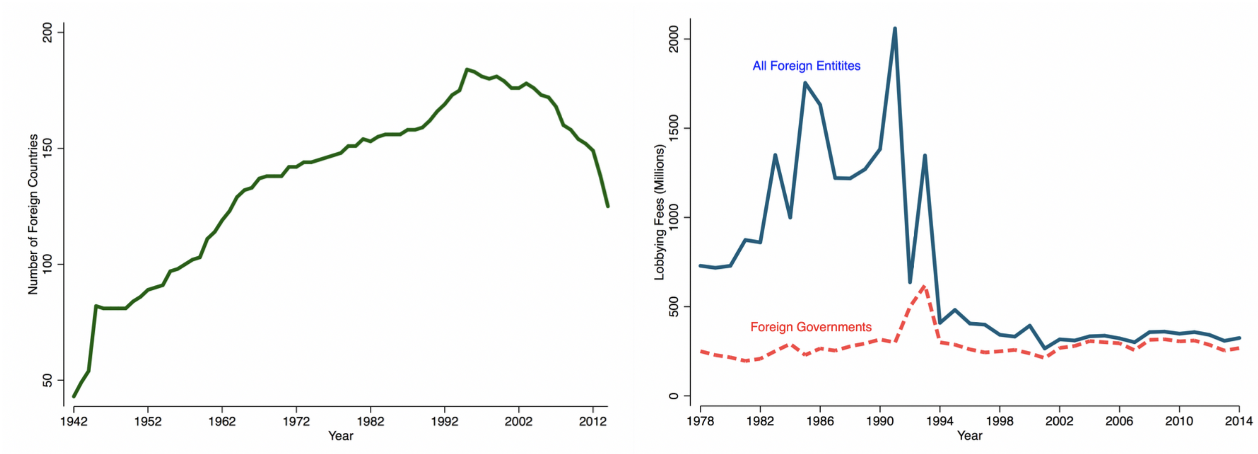
earliest image files go back to 1942, and there were 28,852 semi-annual lobbying reports submitted by the end of 2014. The FARA also requires the Attorney General to submit a semi-annual summary report to Congress regarding foreign lobbying activities. This summary report includes names of foreign clients, registrants who represented foreign clients, lobbying fees the foreign clients paid to the registrants, and brief summaries describing the nature of the lobbying services.[5] I extract that information from the summary reports to Congress for the period from 1942 through 2014.

Figure 1 presents the over-time patterns of foreign lobbying. The left graph shows the number of unique sovereign foreign countries from which foreign clients originated. Since 1960, foreign clients from more than 100 countries were involved in lobbying activities in the US. The right graph shows the total lobbying fees spent by foreign clients. There is much missing data on lobbying fees before 1978 and the report to Congress for the period between 1964 through 1977 entirely omitted information on lobbying fees. Therefore, this graph presents the lobbying fees for the period between 1978 through 2014. I divide the foreign principals into five categories: foreign governments, businesses, political organizations, media, and other. The blue solid line displays the total lobbying fees spent by all types of foreign entities, although most foreign principals were either foreign governments or foreign firms. The red dashed line indicates the total lobbying fees paid by foreign governments. Since the passage of the Lobbying Disclosure Act of 1995, foreign firms that have subsidiaries in the US are allowed to submit lobbying reports under the LDA instead of FARA, and many foreign business entities have chosen to do so because of the LDA's less stringent requirements. This explains a significant drop in lobbying fees around the mid-1990s.

Individual semi-annual lobbying reports provide more detailed information about specific lobbying activities. A joint project of ProPublica and the Sunlight Foundation has digitalized FARA files for the years 2008 through 2010, and this provides a unique opportunity to gauge the scope of foreign activities in recent years.[6] During the three-year period, 144 foreign countries engaged

[5] https://www.justice.gov/nsd-fara/fara-reports-congress
[6] http://foreign.influenceexplorer.com

Figure 1: Foreign Lobbying Over Time



in any type of lobbying activity in the US and submitted 1,938 semi-annual lobbying reports. In other words, more than two-thirds of the world's countries engaged in lobbying activities in the US in the years 2008 through 2010.

The average lobbying expenditure per country during that period was $5.7 million, and total lobbying expenditures amounted to $821.5 million. Considering that total (domestic) lobbying expenditures reported via the Lobbying Disclosure Act amounted to $10.35 billion during the same period, the size of foreign lobbying was relatively large given the number of participating foreign countries. The country that spent the largest amount of money on lobbying was Liberia whose various government entities collectively spent over $90 million; the second largest expenditure on lobbying was by South Korea whose spending exceeded $79 million. There were more than 80,000 contacts made on behalf of foreign governments over the three-year period, and targets covered members of Congress and their staff; bureaucrats in various executive branches; and personnel working in the media, think tanks, universities and non-profit organizations.

Trade and security were the most commonly lobbied issues and members in congressional foreign relations committees and bureaucrats in the State Department or Office of the United States Trade Representative (USTR) were most contacted by lobbyists on behalf of foreign governments. Given that trade policy is inherently international, this contact pattern seems intuitive. Also, trade policy has been one of the most studied areas for scholars who are interested in estimating the effect of interest groups on policy outcomes, and competition among interest groups has dominated discussions of trade politics in the US (Bailey 2001).

Following theoretical studies on the influence of special interests on trade protection measures (Grossman and Helpman 1994, 1995; Mitra 1999), scholars have extensively examined the empirical relationship between the role of special interests and trade policy outcomes. Studies have found that campaign contributions from business or labor groups and constituency interests are associated with voting behaviors of legislators (Box-Steffensmeier, Arnold, and Zorn 1997; Bailey and Brady 1998; Goldberg and Maggi 1999; Baldwin and Magee 2000b; Gawande and Bandyopadhyay 2000; Fordham and McKweon 2003; Gawande and Hoekman 2006). Lobbying expenditures are also positively associated with the policy changes that firms and other interest groups involved in the lobbying process want to achieve (Stoyanov 2009; Bombardini and Trebbi 2012; Ludema, Mayda, and Mishra 2015).

While there is abundant research on the influence of special interest groups on trade policy, little attention has been paid to foreign governments as special interests in the politics of trade, despite their active roles and the intrinsically international nature of trade issues (Grossman and Helpman 1995). For example, the Embassy of the Commonwealth of Australia paid $83,330 to a lobbying firm, Bockorny, Petrizzo, Inc., for six months of lobbying services to meet with US government officials and members of Congress to discuss US-Australia Free Trade Negotiations regarding beef and wheat for the period from August 1, 2003 to January 31, 2004.[7] More recently, the Embassy of Japan paid $384,000 to Akin, Gump, Strauss, Hauer & Feld, LLP, for lobbying services regarding the Trans-Pacific Partnership (TPP) negotiation for the six-month period ending June 30, 2015.[8]

Gawande, Krishna, and Robbins (2006) take foreign lobbying seriously in trade policymaking and show that lobbying spending by foreign entities is associated with lower trade barriers. Gawande, Maloney, and Montes-Rojas (2009) also offer evidence that after Caribbean govern-

[7] https://www.fara.gov/reports/June30-2004.pdf.

[8] https://www.fara.gov/reports/FARA_JUN_2015.pdf

ments lobbied the US, tourist arrival from the US to Caribbean destinations increased. While Gawande, Krishna, and Robbins (2006) and Gawande, Maloney, and Montes-Rojas (2009) shed light on the role of foreign lobbying in US trade policy, they measure the extent of groups' lobbying activities only by foreign entities' lobbying expenditures, leaving lobbying contact information unexamined.

The expenditures do not show the way different groups allocated their resources between legislative and executive bodies, both of which are critical players, and how effectively expenditures were distributed across different legislators. For example, targeting members in the House Ways and Means Committee or the Senate Finance Committee who have direct jurisdiction over trade policy in Congress could be more effective in influencing trade policy than targeting members whose committee assignments are less relevant to international trade issues, even though exactly the same amount was spent on lobbying. Hence, even if groups spend equal amounts on lobbying, the composition of lobbying contacts can have starkly different implications in the effect of lobbying on policy outcomes. Specific contact information under foreign lobbying reports provides a unique opportunity to examine the content of lobbying activities, along with total lobbying spending.

3 Background of Free Trade Agreements and Data

A free trade agreement (FTA) is one way to reduce trade barriers between two or more countries and establish a more stable and open trading and investment environment. The US entered its first FTA with Israel in 1985; since then, the United States has implemented 14 FTAs with 20 countries.[9] After enactment of the Trade Promotion Authority (known as "fast track") under the Bipartisan Trade Promotion Act of 2002 that granted the president and executive branches authority to negotiate international agreements with other countries, the Bush administration initiated discussions of potential free trade agreements with Colombia, Panama, and South Korea in 2003.

Free trade agreements between the United States and each of those countries were signed in

[9] https://ustr.gov/trade-agreements (accessed on February 28th, 2016).

November 2006 (Panama) and June 2007 (South Korea and Colombia) by the Bush administration; but due to various domestic political challenges and concerns, their ratifications were delayed. First, by the time President George W. Bush signed the treaties, Democrats held majorities in both chambers of Congress and ratification was not considered likely before the 2008 presidential election. Therefore, the South Korean and Panamanian FTAs were not even introduced for ratification votes until 2011. Second, during the 2008 presidential campaign, then-Senator Obama expressed reservations about all three treaties; and many of his concerns were shared by other legislators. Many Democrats were concerned that the terms of the Colombian treaty were unfavorable to local labor unions. Democrats suspected that some of the Panamanian treaty terms might make the Latin American nation a tax haven for American businesses. The South Korean treaty was the largest and most complicated of the three, and it was the source of significant special interest opposition in the US and in South Korea.

These challenges were eventually faced during the Obama administration. The administration started renegotiations with the South Korean government, and the parties reached an agreement on December 3, 2010. This new accord received support from US automobile companies and the United Auto Workers, both of which had opposed the previous agreement. On April 6, 2011, the government of Panama agreed to sign a tax treaty to clear potential tax haven issues. Finally, the administration received a letter from the Colombian president on April 19, 2011, which assured the US government of a plan to protect labor rights. These actions paved the way for ratification. Bills were introduced into Congress on October 3, 2011, and all three pacts were ratified ten days later without amendment.[10]

I collected information on all lobbying contacts made by commercial lobbyists whose clients are one of the three countries studied, and whose contacts were related to the previously mentioned free trade agreements.[11] The data is drawn from the lobbying reports mandated by the

[10] Under the fast-track authority, the president and executive branches have complete authority to negotiate international treaties and Congress can only accept or reject the agreement. No amendments or filibusters are allowed.

[11] There are reports made by non-lobbying firms on behalf of the three countries. Their lobbying activities mainly comprised monitoring the process rather than contacting members of Congress or the executive branches. Ninety-nine percent of the contacts made to members of Congress and bureaucrats in federal agencies were made by lobbying firms. Since my focus is identifying types of legislators contacted and estimating the effect of lobbying on members'

Foreign Agent Registration Act of 1938. Under FARA, lobbyists hired by foreign governments and businesses must register with the Department of Justice and submit a semi-annual lobbying disclosure form. The FARA requires detailed disclosure of each contact to government officials including (i) the name of the contacted person and his/her position in the government, (ii) the date of the contact, (iii) the method by which the person was contacted (phone call, in-person meeting, email, etc.), and (iv) the issues discussed with the contact.[12]

Among the FARA reports submitted by the lobbying firms that represented one of the three countries, I focus on the reports that specifically mentioned "free trade agreement" in their issue description. Table 1 presents the summary statistics of these data. There are 145 such reports covering 2003 - 2012, and the three foreign governments paid $24 million to US lobbying firms for their services.[13]

Table 1: Lobbying Activities by Foreign Governments, 2003-2012

Country	**# Firms**[a]	**# Reports**[b]	**Amount ($)**
Colombia	10	27	3,064,223
Panama	14	54	9,956,262
South Korea	17	73	11,742,543
Total	35[c]	145[c]	24,763,028

Notes: a. Total number of lobbying firms that were hired by each country. b. Total number of FARA reports on free trade agreements. c. Because some lobbying firms represented more than one country, this number is not equal to the sum of the column.

I extracted contact information from these lobbying reports, which document contacts via meetings, phone calls, emails, and through social events. To capture meaningful communication between lobbyists and policy-makers, I only used contacts made via meetings or phone calls. Over the time period, 5,831 such contacts were made. Table 2 presents the summary statistics of these

voting, I concentrate on lobbying reports submitted by commercial lobbying firms.

[12] See Appendix F for a sample foreign agent lobbying report.

[13] Among 145 reports, 38 do not include any contact information because those lobbying firms on behalf of the three countries did not engage in any political activity. Instead, those firms reported that they provided advice on general trade matters and analyses regarding trade developments in the US, including monitoring and reporting on developments of the FTA.

data. Eighty percent of the contacts targeted members of Congress, but there were a substantial number of contacts made to those in federal entities, such as the USTR or members of the State Department. Moreover, 31% of the contacts were made in meetings, and there is significant variation across the three countries regarding targeted institutions and contact type.[14]

Table 2: Lobbying Contacts by Foreign Governments, 2003 - 2012

		Contact Agency				Contact Type	
Country	**Total**	**Congress (%)**	**Executive**	**Media**	**Other**	**Meeting (%)**	**Phone**
Colombia	791	85.9	10.8	2.5	0.8	42.1	57.9
Panama	876	70.6	24.2	3.8	1.5	70.2	29.8
South Korea	4,164	82.1	11.4	2.7	3.8	21.0	79.0
Total	5,831	80.8	13.2	2.9	3.1	31.2	68.8

I also collected information from various sources on the 838 unique members of Congress who served during 2003 - 2012. For each member, I gathered information on (i) ideology (party affiliation, DW-NOMINATE score), (ii) leadership position and committee assignments, (iii) the winner's vote share in the most recent election, (iv) whether the member was affiliated with a congressional caucus related to one of the three countries or the region to which any of the countries belonged, (v) campaign contributions from union organizations, and (vi) district characteristics (trade volume with each country, population size, per capita income, manufacturing job growth, and China's import penetration). In addition, I have records of how members who served in the 112th Congress voted on ratification of all three free trade agreement ratifications.

4 Analysis on Lobbying Targets

In this section, I analyze how lobbying firms that represented foreign governments allocated their resources over time and over different targets. I divide the analysis into two stages: the agenda-

[14] Among congressional contacts, 67.4% targeted members of the House of Representatives and 21.1% targeted senators. Congressional staff members in the Senate Finance Committee or House Ways and Means Committee whose jurisdictions cover international trade were followed in terms of targeting (6.4% and 3.8%, respectively). Among the executive branch contacts, 67.7% targeted the USTR and 8.6% targeted officials at the White House. Contacts to the Department of State and Department of Commerce followed at 5.7% for each.

setting stage and the voting stage. The agenda-setting stage is defined as beginning on the date of the earliest lobbying report for one of the three nations studied that mentions "free trade agreement" as its lobbying issue. Given this definition, the agenda-setting stage started on November 29, 2002, for South Korea; on August 30, 2004 for Colombia and on May 1, 2003 for Panama. Note that the treaties were signed in June 2007 for South Korea and Panama, and in November 2006 for Colombia.[15] Hence, lobbying on these treaties started at least two years before they were signed. The agenda-setting stage is defined as ending when the treaties and relevant agreements were finalized: December 3, 2010, for South Korea; April 6, 2011, for Colombia; and April 19, 2011, for Panama. Hence, the duration of the agenda-setting period was 2,926 days for South Korea, 2,410 days for Colombia, and 2,910 days for Panama.

The voting stage is defined as beginning immediately after the agenda-setting stage ends, and ending on the date of the votes in both the House and Senate: October 12, 2011, for all three countries. Given this definition, the duration of the voting stage was 313 days for South Korea, 189 days for Colombia, and 176 days for Panama. During this stage, no amendments to the final treaties and agreements were made.

Table 3 shows the lobbying expenditures and lobbying contacts by each country during each period. Note that I have total lobbying expenditures for a given six-month period, per report. To calculate the lobbying expenditures for each stage from the data, I pro-rate the report-level data by the number of reported days. The majority (over 70%) of total lobbying expenditures was spent during the agenda-setting stage. That said, the intensity of the lobbying activities, as measured by per-day expenditures, is much higher during the voting stage than during the agenda-setting stage. A similar pattern is obtained when measuring the number of contacts with Congress, executive agencies, and the media.

In Figure 2, each point represents a contact record by lobbyists representing Colombia, Panama, or South Korea; the party affiliation of the contacted member is also shown. The vertical line indicates the date of the congressional votes.

[15] The Bush administration started conversations on free trade agreements in early 2003.

Table 3: Lobbying Expenditures and Lobbying Contacts

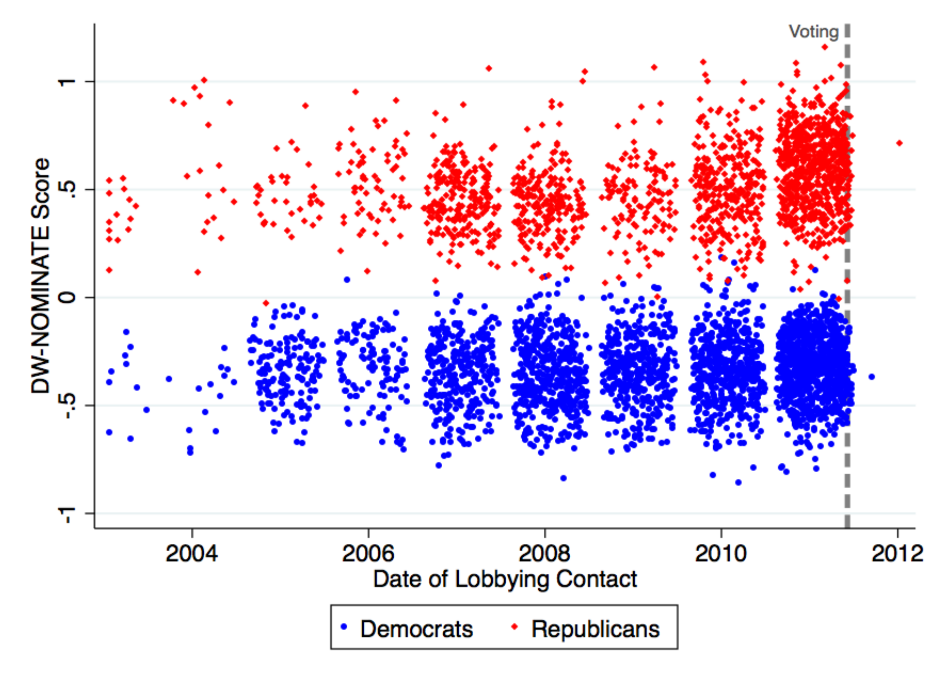
Country	**Agenda Setting** Total	**Agenda Setting** Per-Day	**Voting** Total	**Voting** Per-Day
Panel A. Lobbying Expenditures ($)				
Colombia	2,701,223	1,168	362,999	1,614
Panama	7,704,098	2,474	2,252,163	7,513
South Korea	7,857,140	3,268	3,795,402	7,607
Panel B. Lobbying Contact				
Colombia	330	0.14	461	2.43
Panama	736	0.25	140	0.79
South Korea	2,709	0.92	1,455	4.64

It is noteworthy that while free trade negotiation was handled by federal agencies such as the USTR and the Department of State, lobbyists frequently targeted members of Congress during the process. Given that fast-track authority under the Trade Promotion Act grants all authority to negotiate international trade agreements to the president, and the Congress can only approve or reject the agreement (no amendment or filibuster is allowed) (Koh 1992), this intensive lobbying during the agenda-setting stage is puzzling. However, these lobbying patterns are consistent with theories arguing that interest groups press legislators to influence policy decisions made in executive branches (Fiorina 1977; Epstein and O'Halloran 1995; Hall and Miler 2008; Jordan and Meirowitz 2012; Ban and You 2018; Ritchie and You 2018). Likewise, because trade agreements are very specific about the terms of treaties such as tariff schedules, legislators do not have much influence on the ex post implementation of trade agreements once they have been ratified.[16] Hence, interest groups have strong incentives to contact legislators before the voting stage to design agreements that are favorable to their concerns (You 2017).

Next, I present how lobbyists on behalf of Colombia, Panama, and South Korea changed their targets as legislation advanced, and focus on the identities of the targeted legislators. Among the

[16]For example, the final text of the Korea-US FTA agreement is several thousand pages long and provides a very detailed tariff schedule at the HTS (Harmonized Tariff Schedule) 8-digit level (`https://ustr.gov/sites/default/files/uploads/agreements/fta/korus/asset_upload_file199_12753.pdf`).

Figure 2: Lobbying Contacts Over Time



839 members of Congress who served during the 108th - 112th Congresses, 538 were contacted at least once via phone or in face-to-face meetings by lobbyists who represented one of the three foreign countries. In total, 4,681 contacts targeting members of Congress were made.

I seek to identify the types of legislators who were targeted during each stage of the legislative process. Specifically, I am interested in whether a member's position regarding the free trade agreement - meaning that he/she was either supportive, undecided, or opposed - is associated with lobbyists' targeting in the agenda-setting or voting stage. To analyze lobbyists' strategies in targeting legislators, I developed the following measure of how favorable or unfavorable legislators' predispositions were regarding their opinions on trade agreements prior to being lobbied.

First, I collected voting records for 74 trade-related bills from the 108th through 112th Congresses.[17] Drawn from voting records on these 74 measures, I constructed ideal points for each legislator that captures their ideological preferences on free trade. There could be concern that

[17] Appendix A provides the list of legislation. I excluded FTA legislation on Colombia, Panama, and Korea because votes on those bills are the outcomes of interest. The number of bills in Appendix A is less than 74 because, some of the time, the Senate and House voted separately on bills with the same name.

vote choices for those 74 bills may be affected by lobbying activities on behalf of South Korea, Colombia, and Panama. Therefore, it is inappropriate to use vote choices for those bills to construct the members' ideal points on free trade. But, none of the 74 bills are specific to one of the three countries, and none of the lobbying reports submitted by these three foreign governments mentioned any of these bills.[18]

Figure A1 in Appendix B presents the distribution of these free trade ideal points (left), and the relationship between DW-NOMINATE scores and the free trade ideal points (right).[19] Having measured legislators' preferences on free trade, I then placed the legislators into quartiles based on their free trade ideal point estimates. Legislators were classified as (1) *strong protectionist* if the ideal point is below the first quartile, (2) *weak protectionist* if the ideal point is between the first quartile and the median, (3) *weak free trader* if the ideal point is between the median and the third quartile, and (4) *strong free trader* if the ideal point is above the third quartile. I also define a legislator as being part of the *leadership* if he/she had taken a leadership position, and coded a *committee* variable for those who served on committees that have jurisdiction over international trade affairs: the House Ways and Means and Senate Finance committees.

Table 4 compares the proportion of the members of Congress who belonged to each group depending on their predispositions on free trade, leadership, and their membership in the House Ways and Means Committee or the Senate Finance Committee (*Trade Committee*), and the lobbying resource allocation on those members as measured by the number of lobbying contacts made by lobbyists on behalf of South Korea both in the agenda-setting and voting stages.[20]

I find three key trends in terms of lobbying contacts. First, legislators who held leadership

[18]Still, it is possible that vote choices for those 74 bills were affected by other lobbying activities or campaign contributions. Therefore, it is difficult to know how much vote choices on previous legislation reflect the true preference of a legislator. However, given that my interest is to identify legislator's predispositions on free trade, the source of the predispositions based on past votes matters less.

[19]Unsurprisingly, Democrats tend to be more protectionist and Republicans are more likely to support free trade. It is worth noting that DW-NOMINATE scores are highly correlated with voting behaviors on trade-related issues.

[20]In Table A2 in Appendix C, I also present the results for lobbying by Colombia and Panama that shows patterns similar to lobbying by South Korea. Among the members in leadership, the distribution regarding the trade preference is as follows: strong protectionist (22%), weak protectionist (20%), weak free trader (24%), strong free trader (34%). Among the committee members who served on the Ways and Means Committee in the House and the Finance Committee in the Senate, the distribution regarding trade preference is as follows: strong protectionist (13%), weak protectionist (27%), weak free trader (30%), strong free trader (31%).

Table 4: Comparison of the Composition of Congress and Lobbying Contacts (South Korea)

	Agenda Setting		Voting	
Type	Congress (%)	Lobbying (%)	Congress	Lobbying
Strong Protectionist	25	23.5	25	20.2
Weak Protectionist	25	34.9	25	30.2
Weak Free Trader	25	19.5	25	14.2
Strong Free Trader	25	22.1	25	35.4
Leadership	7	15.1	7	22.8
Trade Committee	8.8	21.5	8	16.8

positions, or who served on the House Ways and Means or the Senate Finance Committees were contacted frequently during both stages of the legislative process. Leaders consist of around 7% of the legislators during the period of study, but they were the targets of more than 15% of the lobbying contacts, and 18% of the total contacts targeted committee members who had direct jurisdiction on the issue. Second, a significant number of contacts (23%) targeted strong opponents of free trade during both stages, and this pattern is more salient during the agenda-setting stage. Third, an increase in lobbying weak opponents and strong allies is shown as time moves from the agenda-setting stage to the voting stage.

To systematically investigate which legislator characteristics are associated with more lobbying contacts in addition to their ex ante positions on free trade, I conduct the following OLS analysis for each agenda-setting and voting stage.[21] Let y_{ijt} denote the number of contacts between legislator i and a lobbyist during stage t (agenda-setting or voting).

$$y_{it} = \beta_t \mathbf{X}_{it} + \varepsilon_{it}. \tag{1}$$

[21] The three countries have slightly different thresholds that divide their agenda-setting and voting stages. For this analysis, I set a common threshold for the three countries and present the results for the Senate and the House of Representatives separately. The common threshold date for dividing the two stages is April 19, 2011 when Panama and the US finalized the treaties and relevant agreements. This is also the last date among the three agreements when executives of the US and foreign governments were involved in designing the contents of the agreement. South Korea and Colombia finalized their treaties on December 3, 2010 and April 6, 2011, respectively. After finalization of the treaties, the critical role moved to the Congress to ratify them. The results are similar when presented for individual countries. However, if I present the result for each country separating the Senate and the House of Representatives, there are six different regression results that do not add much value. For clarity in presenting the result, I use the common threshold.

I use two measures for lobbying contacts: (1) the total number of contacts made to a member's office, including contacts with the member's staffers (*Contact*) and (2) the total number of contacts made directly with a member (*Member*). $\mathbf{X}_{it}$ includes variables for legislators' characteristics and district characteristics. For legislator-level variables, I include party affiliation (*Democrat*); legislator *i*'s ex ante position on free trade based on previous trade-related votes (*Trade Ideal Point*); whether the legislator had a leadership position (*Leadership*); whether he/she belonged to the House Ways and Means or Senate Finance Committee (*Committee*); whether his/her vote share in the most recent election was less than 55% (*Tight Race*) (implying that he/she may have been electorally vulnerable compared to other legislators); the Legislative Effectiveness Score, which measures the "ability to advance a member's agenda items through the legislative process and into law" for members in the House of Representatives (*LES*) (Volden and Wiseman 2014); and whether he/she was a member of a Congressional caucus regarding the respective country or region (*Caucus*).[22] I also include a variable that measures the total campaign contributions from unions for the period between 2004 and 2010 (*Union Contributions*).

For district-level demographic and economic variables, I include % white population; % population with high school or less than high school education; unemployment rate; per capita income; total volume of exports and imports with Colombia, Panama, and Korea; changes in manufacturing employment from 1990 to 2007 and changes in exposure to import competition with China (Autor, Dorn, and Hanson 2013); and % of manufacturing employment.[23] The results are presented in Table 5, where Panel A presents the results for the House and Panel B presents the results for the Senate.[24]

By comparing the results between the two stages, several patterns emerge. First, legislators in the House who held leadership positions were contacted more frequently by lobbyists during both the agenda-setting and voting stages. Second, members who served on the relevant committees on international trade were contacted heavily, and this pattern is more salient during the

[22] LES and caucus membership data are only available for the House of Representatives.

[23] These measures are at the district level for the House regression and at the state level for the Senate regression.

[24] For the full regression results, see Tables A3 and A4 in Appendix C.

Table 5: Member Characteristics and Lobbying Contacts

	Agenda Setting		**Voting**	
	(1) All Contact	(2) Member Contact	(3) All Contact	(4) Member Contact
Panel A. House				
Democrat	3.241***	0.157	0.801	0.107
	(3.26)	(0.93)	(1.05)	(1.60)
Trade Ideal Point	1.508***	0.196**	0.932***	0.0109
	(2.97)	(2.29)	(2.65)	(0.36)
Leadership	3.760***	0.502***	3.483***	0.223***
	(3.35)	(2.65)	(4.52)	(3.32)
Committee	5.385***	1.216***	0.597	0.161**
	(5.72)	(7.66)	(0.81)	(2.52)
Tight Race	-0.312	0.0376	0.498	0.0994*
	(-0.39)	(0.28)	(0.81)	(1.85)
LES	0.824***	0.118***	0.0700	0.000908
	(5.54)	(4.68)	(0.71)	(0.11)
Caucus	6.053***	0.798***	0.821	0.0910**
	(7.35)	(5.74)	(1.56)	(1.99)
(ln) Union Contributions ($)	0.151*	0.0335**	0.0452	-0.00399
	(1.66)	(2.18)	(0.74)	(-0.75)
Demographic Controls	✓	✓	✓	✓
N	695	695	436	436
adj. R^2	0.219	0.192	0.053	0.040
Panel B. Senate				
Democrat	5.084	0.227	10.37	-0.148
	(1.39)	(0.70)	(1.09)	(-0.62)
Trade Ideal Point	2.110	0.349*	5.520	-0.0194
	(0.98)	(1.83)	(1.00)	(-0.14)
Leadership	0.193	0.621***	1.848	0.207
	(0.08)	(2.76)	(0.31)	(1.40)
Committee	12.04***	0.496	24.55***	0.128
	(2.98)	(1.39)	(2.70)	(0.56)
Tight Race	-0.590	-0.171	-1.198	-0.113
	(-0.23)	(-0.77)	(-0.19)	(-0.71)
(ln) Union Contributions ($)	0.388	0.0432**	1.095	0.0556
	(1.61)	(2.03)	(0.69)	(1.40)
Demographic Controls	✓	✓	✓	✓
N	148	148	96	96
adj. R^2	0.053	0.087	0.031	-0.050

Notes: t statistics in parentheses. $^{*}p < 0.1$, $^{**}p < 0.05$, $^{***}p < 0.01$. District-level demographic and industry variables are included in the regression but the results are not reported here.

agenda-setting stage. Although the president and executive agencies, such as the USTR, had the authority to negotiate the treaties, legislators who served on committees that have oversight authority over relevant federal agencies on international trade can influence the contents of agreements via communication with agency bureaucrats. Such oversight activities may explain why relevant committee members were heavily targeted during the agenda-setting stage. Third, lobbyists targeted members of the House who were highly effective in advancing legislation (*LES*) more often during the agenda-setting stage, and members who were associated with congressional caucuses on Colombia, Panama, or South Korea were heavily targeted over the course of the legislative process. Members' district- or state-level demographics and economic conditions were not associated with the frequency of lobbying contacts.

5 Lobbying and Voting Outcomes

In this section, I investigate whether lobbying contacts were associated with voting decisions for free trade legislation in the 112th Congress. House majority leader Eric Cantor (R-VA) introduced the legislation into the House on October 3, 2011; voting for free trade agreements with Colombia, Panama, and South Korea took place on October 12, 2011. The voting results for each agreement are presented in Table 6, and the voting results closely follow partisan lines. While the majority of Democrats in both the House and the Senate opposed the free trade agreements, Republican members almost unanimously supported the treaties.

To investigate the influence of lobbying contacts on voting behavior, I assume that member i's probability of supporting a bill v with a foreign country j is characterized by:

$$Pr(v_{ij} = 1) = \beta_0 + \beta_1 * ID_i + \beta_2 * CI_{ij} + \beta_3 * DL_i + \beta_4 * FL_{ij} + \varepsilon_{ij} \quad (2)$$

where ID_i includes a member i's ideology and other characteristics, CI_i is a proxy for constituent interest in congressional district i, DL_i represents domestic lobbying pressure on free trade, and FL_i denotes foreign lobbying activities.

Table 6: Voting Patterns on Free Trade Agreement Bills

	House			**Senate**		
	Democrats	Republicans	Total	Democrats	Republicans	Total
Panel A. Colombia FTA						
Number voting Yes	31	231	262	21	44	63
Number voting No	158	9	167	30	2	32
Panel B. Panama FTA						
Number voting Yes	66	234	300	30	46	76
Number voting No	123	6	129	21	1	22
Panel C. South Korea FTA						
Number voting Yes	59	219	278	37	45	82
Number voting No	130	21	151	14	1	15

To measure a member's ideology and characteristics, I include her trade ideal points based on previous trade voting records, leadership and committee assignments, and vote share in the most recent election. To measure member i's district characteristics, I include member i's district-level population, its ratio of whites, education levels, per capita incomes, and Gini index; and member i's district trade volumes with the three countries. The trade volume data were not disaggregated to the district level, so I constructed the district-level data based on the International Trade Commission state-industry level trade data and the zip-code level industry composition data.[25] I also employed the data from Autor, Dorn, and Hanson (2013) to construct the district-level changes in manufacturing employment, and the change in Chinese import exposure-per-worker in the district between 1990 and 2007.[26]

An ideal measure for domestic groups' lobbying would be detailed contact information from each domestic group to each legislator, as contained in the foreign lobbying data. Unfortunately, domestic lobbying reports submitted under the LDA only provide the names of federal entities, such as the House of Representatives or the USTR, which each domestic group contacted. Individ-

[25] https://www.usitc.gov.

[26] The change in Chinese import exposure-per-worker is measured by the difference in change in US imports from China per worker in the region. Autor, Dorn, and Hanson (2013) construct those measures at commuting zones for the period between 1990 and 2007. I used the relationship file between commuting zones and counties, and the relationship file between county and congressional district to assign values at the congressional district level. Population weight was applied. For senators, state-level measures were constructed.

ual legislator-level lobbying contact data during the lobbying process by domestic groups do not exist. Given the limitation, I measured domestic groups' pressure on free trade agreements in the following way.

First, I identified domestic groups who lobbied on FTAs with Korea, Columbia, and Panama between 2001 and 2011 using lobbying reports submitted under the Lobbying Disclosure Act (LDA). Since the specific legislation regarding FTAs were introduced in 2011, it would be misleading to identify the groups solely based on bill numbers that groups indicated in their lobbying reports. Given that negotiations were started as early as 2004, it is possible that groups mentioned 'free trade agreements with Korea' in their lobbying reports but did not mention a specific bill name before the legislation was introduced. Therefore, I searched lobbying reports that specifically mentioned the related bill numbers regarding FTAs with the three countries as well as search words such as 'Korea-US free trade deal' to find reports that did not mention the bill number but addressed the issues.[27] In total, 325 groups submitted 1,973 lobbying reports that addressed the FTAs with South Korea, Colombia, and Panama during the period.

Second, after identifying domestic groups that lobbied on the FTAs, I searched each group's preference on the FTAs using various sources such as testimony documented in the Congressional Hearing report on the pending FTAs with Colombia, Panama, and South Korea; public statements; and letters to members of Congress by groups.[28] Among 325 groups who submitted lobbying reports, 295 groups supported the FTAs and 30 groups opposed the FTAs. Third, I merged the list of FTA lobbying groups with the Federal Election Commission's campaign contribution data for the 2004, 2006, 2008, and 2010 election cycles. I used contributor's employer, contributor's name, and contributor's occupation to identify contributor's group affiliation.[29] Then I calculated

[27] There are 11 bills that are related to the FTAs with South Korea, Colombia, and Panama. Table A5 in Appendix C provides the specific list of the bills.

[28] For example, the hearing transcript before the Committee on Ways and Means regarding the pending free trade agreements with Colombia, Panama, and South Korea shows the preference of individuals on behalf of organizations who testified in the hearing (https://www.gpo.gov/fdsys/pkg/CHRG-112hhrg67469/pdf/CHRG-112hhrg67469.pdf). Public letters to members of Congress (https://www.wewear.org/assets/1/7/041708CoalitionLetter.pdf) were also used to identify the preferences of domestic groups on the FTAs.

[29] For contributions from Political Action Committees (PACs), contributor's group affiliation is easily identified. It is difficult to identify the group affiliation for contributions from individual donors who do not supply their occupational information. But, most of those cases comprise donations from retired individuals, doctors, or attorneys. Given that

the total contributions from pro-FTA groups and anti-FTA groups at each legislator level.

I used total lobbying contacts made by the three countries over the period as a measure for the foreign lobbying effort made to a legislator. For example, even if a member was contacted about free trade by a lobbyist on behalf of Colombia, the contact could have influenced voting on the Colombian FTA as well as voting on the Panamanian or Korean FTA, since it pertained to the same issue.

Although I controlled for variables that could affect the vote choices of members, a decision to target a specific legislator is not random, and therefore, it is difficult to establish causality between lobbying contacts and vote outcomes. There may be some omitted variables that could affect both lobbying contacts by lobbyists and a propensity to vote for FTA bills. To address this issue, I used the contacts made by lobbying firms on behalf of other foreign countries to lobby members of Congress on non-trade issues before the 112th Congress (when voting on FTA legislation occurred) as an instrumental variable.[30] The rationale behind this empirical strategy is that contacts made by lobbying firms on behalf of foreign countries other than Colombia, Panama, or South Korea on non-trade issues before the 112th Congress may be correlated with contacts made by lobbying firms representing Colombia, Panama, or South Korea on free trade agreements. For example, a legislator may learn that meeting with a lobbyist on behalf of other foreign countries is actually useful in gathering policy-relevant information. Therefore, she may be more willing to give access to a lobbyist who represented either Colombia, or Panama, or South Korea.

A legislator who met with and learned from a lobbyist on behalf of the United Arab Emirates (UAE) on arms sales in 2008, for example, may be more likely to allow contact with a lobbyist on behalf of South Korea on trade issues because she learned that lobbyists bring her policy-relevant information. However, the UAE's contact in 2008 on arms sales may not have any direct influence on her voting on FTA legislation in 2012. If this exclusion restriction holds, lobbying contacts made before the 112th Congress meet the requirement to be a valid instrument (Angrist

groups that lobbied on the FTAs were either large corporations or labor unions, it is unlikely that observations with no information about affiliation affect the contribution calculation for this study.

[30]This is similar to a strategy that is employed in Facchini, Mayda, and Mishra (2011) who use the total lobbying spending by firms on non-immigration issues as an instrument for total spending on immigration issues.

and Pischke 2009).[31]

To implement this strategy, I collected the total lobbying contacts made to members by lobbyists on behalf of other foreign governments during the period between 2008 and 2010 on non-trade issues.[32] Seventy-five foreign countries - other than Colombia, Panama, and South Korea - made 7,005 contacts targeting members of Congress during the period. For each Democrat, I calculated the total contacts made by foreign countries between 2008 and 2010. I then used this measure as an instrument for the total contacts made on free trade agreements by Colombia, Panama, and South Korea for the Democratic legislators who served in the 112th Congress when the voting occurred.

I instrumented for the main explanatory variable, *FTA Contact*, using the total contacts made by other foreign governments on non-trade issues before the 112th Congress (Pre Contact$_i$). I fit models of the following form:

$$\begin{aligned} \text{(FS)} : \text{FTA Contact}_i &= \gamma_0 + \gamma_1 * \text{Pre Contact}_i + \Gamma X'_{ij} + \nu_{ij} \\ \text{(RF)} : \text{Voting}_{ij} &= \beta_0 + \beta_1 * \text{FTA Contact}_i + \Gamma X'_{ij} + \varepsilon_{ij} \end{aligned} \quad (3)$$

The first-stage results are presented in Table A7 in Appendix D.[33] The total number of contacts made by the three countries on free trade agreements is strongly associated with the total number of contacts made by lobbyists on behalf of other countries during the years between 2008 and 2010 in the House. F-statistics are around 17, which is above the conventional threshold for a weak instrument (Stock, Wright, and Yogo 2002). In the Senate, I do not observe a strong first-stage

[31] There may be some concern that if a lobbying firm worked both for the UAE and for South Korea, a lobbyist may discuss the South Korean FTA with member *i* while lobbying on behalf of the UAE. Except for a few large lobbying firms, firms that represent foreign governments have less than two foreign governments as their clients during the regular six-month contracting period. Even for the few large lobbying firms with multiple foreign clients at the same time, there is a clear division of labor among lobbyists representing a foreign client and the issue area. This is shown in the sample lobbying report in Figure F in Appendix F where a specific lobbyist's name is presented. According to my interviews with lobbyists who represented foreign governments, it is considered a violation of fiduciary duties to their clients if lobbyists discuss other client countries' matters when meeting members of Congress to discuss the assigned client country's issue. I also checked whether other foreign governments lobbied on Colombian, Panamanian, and South Korean free trade agreements during the period and none of the lobbying reports and contacts mentioned the issue. Foreign lobbying issues are very country specific.

[32] The data source is image files posted in `fara.gov` under the Department of Justice. Non-trade issues include security (26.4%), administrative (16.4%), budget (11.8%), and general bilateral relationships (45.4%).

[33] Figure A2 also offers a relationship between the pre-foreign contacts and the FTA-related lobbying contacts.

relationship.

Table 7 presents the regression results for three FTA votes in the House.[34] Columns from (1) through (3) present the ordinary least square (OLS) results, while columns from (4) through (6) present the results from instrumental variable (IV) analysis. Although the OLS results do not present any statistically significant relationship between FTA-related contacts by foreign governments and voting outcomes, the IV results indicate that lobbying contacts have a significant effect on members' voting on Panamanian and Korean FTAs. In Table A8 in the Appendix, I provide several robustness checks including (1) using country-specific contacts as a main variable and (2) measuring lobbying contacts by money spent on contacting each member, instead of measuring lobbying intensity by number of contacts. The robustness checks assure that the effect of foreign lobbying on FTA votes is largely consistent across different specifications and measurements.

In addition to lobbying by foreign governments, characteristics of a member and her district are also associated with voting patterns on the FTAs. Members who were more positively predisposed toward free trade based on their previous voting records are more likely to support the FTA bills. While members who received more campaign contributions from domestic groups that supported the FTA tended to vote for FTAs, those who received more contributions from groups that opposed the FTAs, mainly unions and textile organizations, were less likely to support the FTAs. Regarding the district-level characteristics, manufacturing employment growth in members' districts was associated with support for free trade deals.

6 Conclusion

The question of which groups influence US trade policy has garnered significant scholarly attention over the years (e.g., Grossman and Helpman 1994; Bailey 2001). While domestic interest groups are widely cited as one of the most powerful groups influencing US trade policy, the role of foreign governments and their lobbying activities has been largely ignored in the discussion. However, as lobbying reports submitted under the FARA suggest, the scope of participation and the level of

[34] Summary statistics for the variables are presented in Table A6 in Appendix C.

Table 7: Foreign Lobbying and Voting Patterns on FTA Legislation: House

	OLS			**IV**		
	(1) Columbia	(2) Panama	(3) Korea	(4) Columbia	(5) Panama	(6) Korea
FTA Contact	0.0000703	0.00172	0.00162	0.00591	0.0108**	0.00920**
	(0.03)	(0.67)	(0.64)	(1.17)	(2.14)	(2.05)
Democrat	-0.538***	-0.312***	-0.285***	-0.560***	-0.347***	-0.313***
	(-7.89)	(-4.37)	(-3.70)	(-8.22)	(-4.82)	(-4.06)
Trade Ideal Point	0.104***	0.146***	0.147***	0.0909***	0.127***	0.131***
	(4.98)	(5.86)	(5.32)	(3.96)	(4.73)	(4.50)
Leadership	0.0152	0.0320	0.0628	-0.0309	-0.0388	0.00361
	(0.29)	(0.49)	(1.00)	(-0.46)	(-0.51)	(0.05)
Related Committee[a]	-0.0212	0.148**	0.128*	-0.0897	0.0414	0.0386
	(-0.42)	(2.06)	(1.73)	(-1.30)	(0.45)	(0.43)
Tight Race[b]	0.0140	-0.0112	0.0154	0.0146	-0.0106	0.0145
	(0.38)	(-0.26)	(0.33)	(0.41)	(-0.25)	(0.32)
(ln) Pro FTA Contributions[c]	0.0145*	0.0164*	0.0161*	0.00878	0.00774	0.00920
	(1.75)	(1.73)	(1.65)	(1.03)	(0.74)	(0.94)
(ln) Anti FTA Contributions[d]	-0.00874**	-0.00897**	-0.00910**	-0.00936**	-0.0101**	-0.0102**
	(-2.36)	(-2.43)	(-2.11)	(-2.42)	(-2.42)	(-2.23)
(ln) Population	0.341**	0.307*	0.217	0.285**	0.224	0.152
	(2.56)	(1.80)	(1.19)	(1.98)	(1.15)	(0.76)
White Ratio	0.0597	0.200	0.0658	0.0913	0.242*	0.110
	(0.52)	(1.45)	(0.45)	(0.81)	(1.76)	(0.74)
Lower Education[e]	0.373	0.299	0.551	0.212	0.0491	0.369
	(1.11)	(0.83)	(1.44)	(0.64)	(0.13)	(0.97)
Unemployment	-0.571	-0.115	0.597	-0.349	0.0774	0.715
	(-0.63)	(-0.13)	(0.63)	(-0.39)	(0.08)	(0.75)
Income pc	0.0718	0.108	0.373**	0.0350	0.0350	0.310**
	(0.50)	(0.70)	(2.39)	(0.25)	(0.23)	(1.99)
Gini	-0.0719	1.020	-0.175	-0.164	1.017*	-0.175
	(-0.13)	(1.64)	(-0.26)	(-0.30)	(1.67)	(-0.26)
(ln) Trade Volume with j[f]	-0.0271	-0.0571	-0.0277	-0.0145	-0.0301	-0.0119
	(-1.24)	(-1.48)	(-0.71)	(-0.68)	(-0.73)	(-0.31)
% Change in Manufacturing Emp.[g]	0.0170**	0.0116	0.0655***	0.0149*	0.00967	0.0639***
	(2.07)	(1.13)	(5.89)	(1.86)	(0.97)	(5.81)
Competition with Chinese Import[h]	0.00459	0.00676	0.0155	0.00258	0.00361	0.0124
	(0.45)	(0.59)	(1.34)	(0.25)	(0.31)	(1.07)
N	435	435	435	435	435	435
adj. R^2	0.669	0.513	0.498	0.652	0.465	0.467

Notes: t statistics in parentheses. $^{*}p < 0.1$, $^{**}p < 0.05$, $^{***}p < 0.01$. Robust standard errors are used. **a**. 1 if a member i serves on the House Ways and Means Committee or the Senate Finance Committee. **b**. 1 if the vote share in the most recent election is less than 0.55. **c**. (ln) Total contributions between 2004 - 2010 from groups that supported the FTAs. **d**. (ln) Total contributions between 2004 - 2010 from groups that opposed the FTAs. **e**. Ratio of a district population whose education is less than or equal to high school. **f**. $j \in \{$Columbia, Panama, Korea$\}$ depending on the FTA vote. **g**. % changes in manufacturing employment, 1990-2007 (Autor, Dorn, and Hanson 2013). **h**: Changes in exposure to Chinese Imports per worker, 1990-2007 (Autor, Dorn, and Hanson 2013).

expenditures by foreign entities are impressive. Even though the active participation of foreign governments in the lobbying process has been documented since FARA was enacted in 1938, our understanding of their influence in the US policymaking process remains limited.

In this paper, I construct and analyze a novel dataset on the activities by lobbyists that the governments of South Korea, Colombia, and Panama hired to lobby the United States government regarding their respective free trade agreements with the US. I find that targeting strategies by lobbyists vary depending on the stage of the legislative process. During the agenda-setting stage, lobbyists tend to target legislators who have leadership positions, those who serve on committees with jurisdiction over international trade, and those who are highly effective in the legislative process. As the legislation advances to the floor voting stage, those who are in leadership and legislators who faced tight races in recent elections tend to have more contacts with lobbyists. Regarding types of legislators, defined by their *ex ante* positions on free trade, I find that all types of legislators are targeted both in the agenda-setting and voting stages. During the agenda-setting process, strong opponents to free trade are often targeted, but that strategy shifts to undecided members and strong allies during the voting stage. I also present evidence that lobbying influences voting patterns in the House.

This paper has several implications for the study of special interest groups and the role of Congress in shaping trade policy. First, this article sheds light on the role of foreign governments in constructing US trade policy. Previous research has documented that lobbying spending by foreign entities is associated with lower trade barriers with, and increased visits by US tourists to, those foreign countries (Gawande, Krishna, and Robbins 2006; Gawande, Maloney, and Montes-Rojas 2009). By analyzing detailed lobbying contacts made to members of Congress, in addition to the total spending by foreign governments, this article improves our understanding of the interaction between US policymakers and foreign governments. Examining other policy areas, such as arms sales or foreign aid, will give a more complete picture of the influence of foreign governments on US foreign policy.

Second, given that the president and the executive branch have complete authority to negotiate international trade with foreign countries, the sheer amount of lobbying targeting members of Congress during the negotiation stage is consistent with theories arguing that interest groups lobby Congress to influence decisions made by federal agencies (Arnold 1979; Epstein and O'Halloran 1995; Gordon and Hafer 2005; Ritchie and You 2018). This raises an interesting question about how interest groups lobby members of Congress to influence various bureaucratic decisions, such as negotiating international treaties, not just the implementation of statutes after the legislation has passed Congress.

Finally, empirical patterns of targeting illustrate that lobbyists target a diverse set of legislators and, often, strong opponents of the legislation are contacted. Although it is difficult to generalize this finding to overall lobbying strategies that interest groups employ, given that the literature documents that legislators who are allies of interest groups tend to be heavily targeted (Kollman 1997; Caldeira and Wright 1998; Hojnacki and Kimball 1999; Heberlig 2005; Hall and Deadorff 2006; Hall and Miler 2008), it is noticeable that a diverse set of legislators are targeted in this instance.

While the extant literature on lobbying emphasizes the transmission of information from interest groups to legislators (Hansen, 1991; Austen-Smith, 1993; Lohmann, 1995; Austen-Smith, 1998) or legislative subsidies to their allies in Congress (Hall and Deadorff 2006), legislators may provide their own information to lobbyists, who may selectively spread that information to other legislators. For example, during the agenda-setting stage, lobbyists may contact a diverse set of legislators to collect information about a bill's prospects. Therefore, contacting strong opponents can help lobbyists and supporting legislators who push the policy through the legislative process by identifying likely sources of opposition to the bill. This kind of informational dynamic is more relevant when we consider that policy making is often a collective process.

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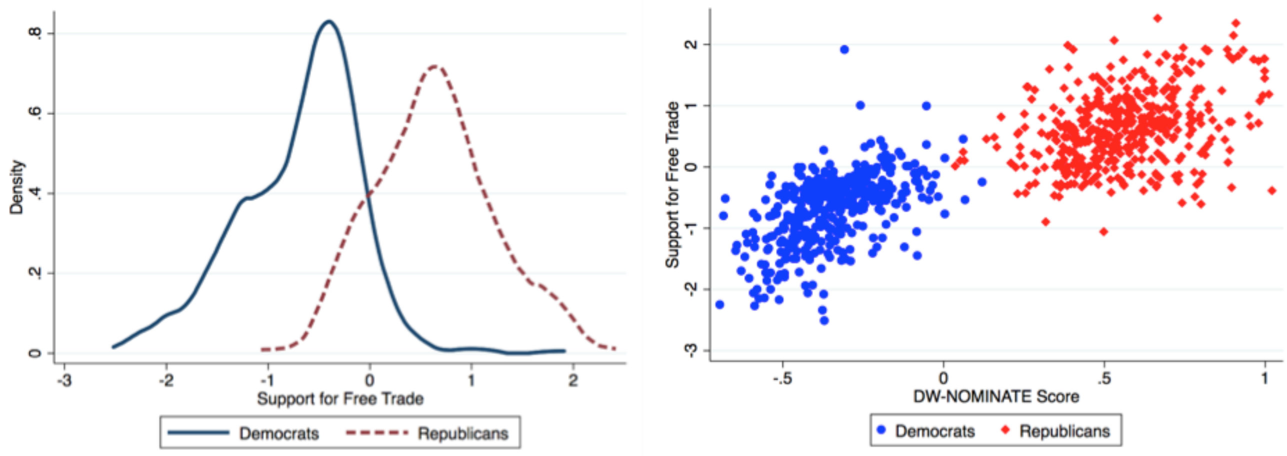
A Appendix: List of Trade-related Legislation

Table A1: List of Trade-related Bills, 2003-2012

Congress	Year	Description	Congress	Year	Description
108	2003	Burma Import Sanctions	109	2006	Miscellaneous Tariff Cuts
108	2003	Singapore FTA	109	2006	Approve Dubai Ports World Deal
108	2003	Chile FTA	109	2006	Reject Raising Airline Investment Cap
108	2003	Cuba Travel Ban	109	2006	Internet Gambling Payments
108	2003	Country of Origin Labeling	109	2006	Vietnam PNTR
108	2003	Computer Export Controls	109	2006	AGO, ATPA Extension
108	2003	Oppose EU GMO Ban	110	2007	Eliminate Worker Visas
108	2004	Restrict Federal Outsourcing	110	2007	Ban Mexican Trucks
108	2004	Australia FTA	110	2007	Peru FTA
108	2004	Morocco FTA	110	2007	Farm Bill
108	2004	Miscellaneous Tariff Cuts	110	2007	Defund Visa Waiver Program
108	2004	Increase Foreign Doctors	110	2007	Andean Trade Preference Act
108	2004	Cut Market Access Program	110	2007	Expand Fam Exports to Cuba
109	2005	China Currency Sanctions	110	2007	Reduce Sugar Protection
109	2005	Cuba Travel Ban	110	2008	Suspend TPA
109	2005	DR-CAFTA	110	2008	Reduce Cotton Subsidies
109	2005	Protect US Trade Laws	111	2009	Ending Offshoring Act
109	2005	Withdrawn US from WTO	111	2010	Currency Reform for Fair Trade
109	2005	Restrict Contract w/ Offshoring Firms	111	2010	US Manufacturing Act
109	2005	Defund Approval of CNOOC	112	2011	Currency Exchange Rate Reform
109	2005	Bahrain FTA	112	2012	Export-Import Bank Reauthorization
109	2005	Maintain "Byrd Law"	112	2012	Eliminated Sugar Program
109	2006	Study of Foreign Debt	112	2012	Russia and Moldova PNTR
109	2006	100% Container Scanning	112	2012	Farm Bill
109	2006	Orman FTA	112	2012	Applying Countervailing Duly Law

B Ideal Point Estimates over Free Trade

Figure A1: Trade Ideal Point Estimates



C Appendix: Tables

Table A2: Comparison of the Composition of Congress and Lobbying Contacts

	Agenda Setting		Voting	
Type	Congress (%)	Lobbying (%)	Congress	Lobbying
A. Colombia				
Strong Protectionist	25	31.3	25	9.1
Weak Protectionist	25	28.9	25	55.2
Weak Free Trader	25	23.6	25	7
Strong Free Trader	25	16.2	25	28.7
Leadership	6.4	13	6.8	35
Trade Committee	8.9	20.7	7.9	48.3
B. Panama				
Strong Protectionist	25	27	25	25.7
Weak Protectionist	25	39.8	25	33.3
Weak Free Trader	25	18.9	25	16.2
Strong Free Trader	25	14.3	25	24.8
Leadership	6.4	17.8	6	15.2
Trade Committee	8.9	30.7	7.9	12.4

Table A3: Member Characteristics and Lobbying Contacts: House

	Agenda Setting		**Voting**	
	(1) Contact	(2) Member	(3) Contact	(4) Member
Democrat	3.241***	0.157	0.801	0.107
	(3.26)	(0.93)	(1.05)	(1.60)
Trade Ideal Point	1.508***	0.196**	0.932***	0.0109
	(2.97)	(2.29)	(2.65)	(0.36)
Leadership	3.760***	0.502***	3.483***	0.223***
	(3.35)	(2.65)	(4.52)	(3.32)
Committee	5.385***	1.216***	0.597	0.161**
	(5.72)	(7.66)	(0.81)	(2.52)
Tight Race	-0.312	0.0376	0.498	0.0994*
	(-0.39)	(0.28)	(0.81)	(1.85)
LES	0.824***	0.118***	0.0700	0.000908
	(5.54)	(4.68)	(0.71)	(0.11)
Caucus	6.053***	0.798***	0.821	0.0910**
	(7.35)	(5.74)	(1.56)	(1.99)
(ln) Union Contributions ($)	0.151*	0.0335**	0.0452	-0.00399
	(1.66)	(2.18)	(0.74)	(-0.75)
(ln) Total Export[a]	-0.949	-0.145	0.994	0.0610
	(-0.91)	(-0.83)	(1.32)	(0.93)
(ln) Total Import[b]	-0.654	-0.0566	-0.655	-0.0674
	(-0.78)	(-0.40)	(-1.09)	(-1.29)
% Change in Manufacturing Emp.[c]	0.189	0.0438	-0.0798	-0.00281
	(0.88)	(1.20)	(-0.50)	(-0.20)
Competition with Chinese Import[d]	0.316	0.0521	0.1000	-0.0166
	(1.38)	(1.35)	(0.62)	(-1.18)
(ln) Manufacturing Employment[e]	2.996	-0.237	-3.140	0.261
	(0.41)	(-0.19)	(-0.60)	(0.57)
% White	-2.592	-0.377	-0.675	0.0802
	(-1.02)	(-0.88)	(-0.37)	(0.50)
% Less than High School Education	7.425	1.356	5.017	0.303
	(1.21)	(1.30)	(1.14)	(0.79)
Unemployment	-34.06*	-4.181	9.225	-0.705
	(-1.87)	(-1.36)	(0.71)	(-0.63)
(ln) Income per capita	2.048	0.0666	1.819	0.0201
	(0.80)	(0.15)	(1.01)	(0.13)
Constant	-2.539	1.511	-25.11	-0.217
	(-0.08)	(0.29)	(-1.17)	(-0.12)
N	695	695	436	436
adj. R^2	0.219	0.192	0.053	0.040

Notes: t statistics in parentheses. $^{*}p < 0.1$, $^{**}p < 0.05$, $^{***}p < 0.01$. Demographic variables are at the district level. a: Total export ($K) to Colombia, Panama, and South Korea in 2010-2011. b: Total import ($K) to Colombia, Panama, and South Korea in 2010-2011. c: % changes in manufacturing employment, 1990-2007 (Autor, Dorn, and Hanson 2013). d: Changes in exposure to Chinese Imports per worker, 1990-2007 (Autor, Dorn, and Hanson 2013). e: Manufacturing employment share.

Table A4: Member Characteristics and Lobbying Contacts: Senate

	Agenda Setting		**Voting**	
	(1) Contact	(2) Member	(3) Contact	(4) Member
Democrat	5.084	0.227	10.37	-0.148
	(1.39)	(0.70)	(1.09)	(-0.62)
Trade Ideal Point	2.110	0.349*	5.520	-0.0194
	(0.98)	(1.83)	(1.00)	(-0.14)
Leadership	0.193	0.621***	1.848	0.207
	(0.08)	(2.76)	(0.31)	(1.40)
Committee	12.04***	0.496	24.55***	0.128
	(2.98)	(1.39)	(2.70)	(0.56)
Tight Race	-0.590	-0.171	-1.198	-0.113
	(-0.23)	(-0.77)	(-0.19)	(-0.71)
(ln) Union Contributions ($)	0.388	0.0432**	1.095	0.0556
	(1.61)	(2.03)	(0.69)	(1.40)
(ln) Total Export[a]	1.667	-0.00399	3.721	0.163
	(0.39)	(-0.01)	(0.37)	(0.65)
(ln) Total Import[b]	-1.537	-0.0979	-1.716	-0.131
	(-0.41)	(-0.30)	(-0.19)	(-0.59)
% Change in Manufacturing Emp.[c]	-0.207	0.0724	-1.687	0.000473
	(-0.25)	(0.98)	(-0.86)	(0.01)
Competition with Chinese Import[d]	1.011	0.0754	2.519	0.0941
	(0.96)	(0.81)	(1.04)	(1.55)
(ln) Manufacturing Employment[e]	-46.25	0.235	-109.6	-0.725
	(-1.45)	(0.08)	(-1.50)	(-0.40)
% White	0.896	0.768	26.17	0.0661
	(0.07)	(0.64)	(0.83)	(0.08)
% Less than High School Education	2.986	0.121	-4.300	-1.333
	(0.10)	(0.05)	(-0.06)	(-0.76)
Unemployment	60.85	14.17	-109.8	-3.351
	(0.62)	(1.63)	(-0.49)	(-0.60)
(ln) Income per capita	-13.69	0.826	-45.13	-0.206
	(-1.11)	(0.76)	(-1.52)	(-0.28)
Constant	134.8	-9.137	417.4	1.870
	(1.03)	(-0.79)	(1.33)	(0.24)
N	148	148	96	96
adj. R^2	0.053	0.087	0.031	-0.050

Notes: t statistics in parentheses. $^{*}p < 0.1$, $^{**}p < 0.05$, $^{***}p < 0.01$. Demographic variables are at the state level. a: Total export ($K) to Colombia, Panama, and South Korea in 2010-2011. b: Total import ($K) to Colombia, Panama, and South Korea in 2010-2011. c: % changes in manufacturing employment, 1990-2007 (Autor, Dorn, and Hanson 2013). d: Changes in exposure to Chinese Imports per worker, 1990-2007 (Autor, Dorn, and Hanson 2013). e: Manufacturing employment share.

Table A5: List of Colombian, Panamanian, and Korean FTA-related Bills

Congress	Bill Number	Title
111th	H.Res.987	Recognizing the importance of trade to the United States economy and the importance of passing free trade agreements with Colombia, South Korea, and Panama
112th	H.Res.86	Recognizing the importance of trade to the United States economy and the importance of passing free trade agreements with Colombia, South Korea, and Panama
112th	H.R.2832	To Extend the Generalized System of Preferences, and for other purposes
112th	H.R.3080	United States-Korea Free Trade Agreement Implementation Act
112th	S.1642	United States-Korea Free Trade Agreement Implementation Act
112th	H.R.3079	United States-Panama Trade Promotion Agreement Implementation Act
112th	S.1643	United States-Panama Trade Promotion Agreement Implementation Act
112th	H.R.3078	United States-Colombia Trade Promotion Agreement Implementation Act
112th	S. 1641	United States-Colombia Trade Promotion Agreement Implementation Act
112th	H.Res.418	Providing for consideration of the Senate amendment to the bill (H.R. 2832) to extend the Generalized System of Preferences, and for other purposes
112th	H.Res.425	Providing for consideration of the Senate amendment to the bill (H.R. 2832) to extend the Generalized System of Preferences, and for other purposes; providing for consideration of the bill (H.R. 3078) to implement the United States-Colombia Trade Promotion Agreement; providing for consideration of the bill (H.R. 3079) to implement the United States-Panama Trade Promotion Agreement; and providing for consideration of the bill (H.R. 3080) to implement the United States-Korea Free Trade Agreement

Table A6: Summary Statistics of the Variables

Variable	N	Mean	S.D.	Min.	Max
Panel A. House					
Democrat	438	0.45	0.50	0.00	1.00
Trade Ideal Point	438	-0.01	0.96	-2.52	2.42
Leadership	438	0.08	0.27	0.00	1.00
Committee	438	0.09	0.29	0.00	1.00
Tight Race	438	0.16	0.36	0.00	1.00
(ln) Pro FTA Group Contribution ($)	438	11.80	1.66	0.00	14.35
(ln) Anti FTA Group Contribution ($)	438	7.98	5.21	0.00	14.54
(ln) Population	438	13.46	0.10	13.08	13.85
White Ratio	438	0.74	0.18	0.16	0.97
Lower Education	438	0.44	0.10	0.17	0.73
Unemployment	438	0.09	0.02	0.03	0.23
Income pc	438	10.22	0.25	9.47	11.23
Gini	438	0.45	0.03	0.38	0.60
(ln) Trade with Colombia ($K)	438	11.50	0.78	8.51	14.27
(ln) Trade with Panama ($K)	438	10.21	0.53	7.43	11.50
(ln) Trade with Korea ($K)	438	12.78	0.54	9.79	14.10
% Change in Manufacturing Employment 90-07	435	-4.02	2.01	-16.70	2.28
Change in Chinese Import per Worker, 90-07	435	3.43	1.86	0.65	13.51
Total FTA Lobbying Contacts	438	6.54	12.34	0.00	111
Foreign Lobbying Contact 08-10	438	7.95	14.60	0.00	150
Panel B. Senate					
Democrat	101	0.52	0.50	0.00	1.00
Trade Ideal Point	101	0.02	0.77	-1.59	1.98
Leadership	101	0.31	0.46	0.00	1.00
Committee	101	0.09	0.29	0.00	1.00
Tight Race	101	0.23	0.42	0.00	1.00
(ln) Pro FTA Group Contribution ($)	101	12.96	1.59	0.00	15.90
(ln) Anti FTA Group Contribution ($)	101	9.61	4.09	0.00	16.73
(ln) Population	101	15.14	1.01	13.23	17.43
White Ratio	101	0.78	0.13	0.25	0.95
Lower Education	101	0.43	0.05	0.33	0.58
Unemployment	101	0.08	0.02	0.03	0.12
Income pc	101	10.23	0.14	9.95	10.56
Gini	101	0.45	0.02	0.41	0.50
(ln) Trade with Colombia ($K)	101	13.42	1.03	11.24	16.34
(ln) Trade with Panama ($K)	101	12.06	0.94	10.04	14.23
(ln) Trade with Korea ($K)	101	14.58	1.02	11.83	17.02
% Change in Manufacturing Employment 90-07	97	-3.19	2.57	-9.76	2.41
Change in Chinese Import per Worker, 90-07	97	3.46	2.03	0.68	8.62
Total FTA Lobbying Contacts	101	11.50	38.20	0.00	357
Foreign Lobbying Contact 08-10	101	17.55	17.82	0.00	101

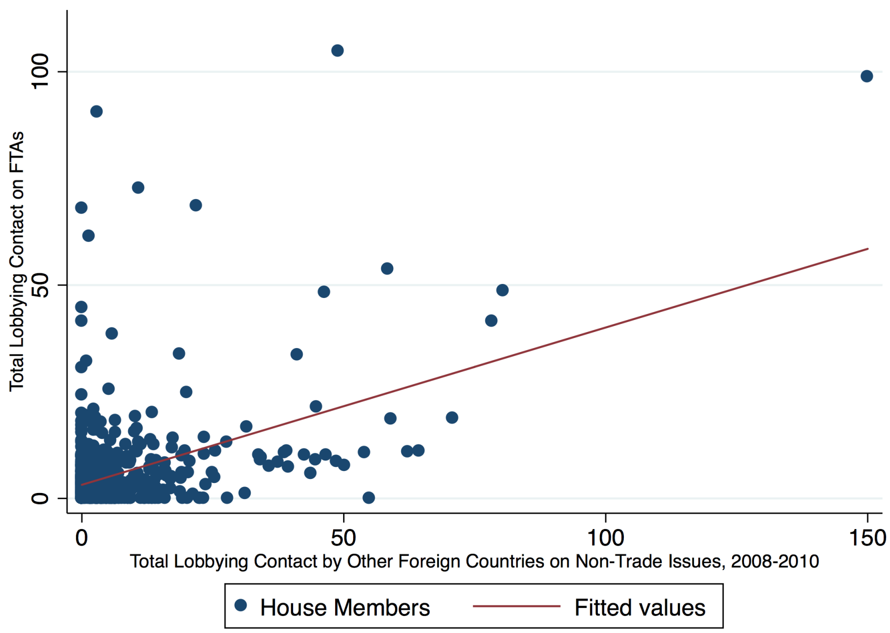
D Appendix: First-Stage Results for Instrumental Variable Analysis

Table A7: Foreign Lobbying and Voting Patterns on FTA Legislation: First Stage Result

DV = FTA Lobbying Contacts × Position	(1) Colombia	(2) Panama	(3) Korea
Panel A. House			
Pre Contact	0.310^{***}	0.310^{***}	0.315^{***}
	(4.13)	(4.10)	(4.17)
Other Controls	✓	✓	✓
Kleibergen-Paap F statistic	17.08	16.79	17.38
N	435	435	435
adj. R^2	0.290	0.290	0.289
Panel B. Senate			
Pre Contact	0.587^{*}	0.567^{*}	0.557^{*}
	(1.88)	(1.87)	(1.88)
Other Controls	✓	✓	✓
Kleibergen-Paap F statistic	3.55	3.48	3.55
N	96	96	96
adj. R^2	0.083	0.075	0.067

Notes: t statistics in parentheses. $^{*}p < 0.1$, $^{**}p < 0.05$, $^{***}p < 0.01$. Robust standard errors are used.

Figure A2: Relationship between Pre-Foreign Contacts and Total Contacts on FTA (House)



E Appendix: Robustness Checks

Panel A in Table A8 presents the regression results when I use a country-specific lobbying contact as a main explanatory variable instead of the total number of contacts by all three countries. Panel B in Table A8 presents the results when I measure lobbying intensity by money spent on contacting each member instead of measuring lobbying intensity by number of contacts. To calculate the dollar amount spent on lobbying each member, I aggregated the total number of contacts made by each lobbying firm on behalf of each foreign country in every six-month period. Then I divided the total lobbying fees paid to lobbying firms by foreign governments for the six-month period by the total number of contacts made during the period. This creates a per-contact cost for each client country. Then I aggregated the per-contact cost at the member level. As a final product, I now have the total amounts that the governments of Colombia, Panama, and South Korea separately spent to contact each member. Both results are consistent with the main results presented in Table 7.

Table A8: Foreign Lobbying and Voting Patterns on FTA Legislation: House

	OLS			**IV**		
	(1) Columbia	(2) Panama	(3) Korea	(4) Columbia	(5) Panama	(6) Korea
Panel A: Country-Specific Contact						
Colombia Contact	-0.00321			0.0542		
	(-0.21)			(0.99)		
Panama Contact		0.0207***			0.0441*	
		(3.36)			(1.71)	
Korea Contact			0.000777			0.0142**
			(0.25)			(2.03)
Other Controls	✓	✓	✓	✓	✓	✓
N	435	435	435	435	435	435
adj. R^2	0.670	0.522	0.497	0.622	0.508	0.437
Panel B: Lobbying Spending						
(ln) Lobbying Spending	0.00213	0.00842**	0.00385	0.0335	0.0656**	0.0520**
	(0.69)	(2.32)	(1.05)	(1.41)	(2.52)	(2.02)
Other Controls	✓	✓	✓	✓	✓	✓
N	435	435	435	435	435	435
adj. R^2	0.670	0.516	0.498	0.607	0.286	0.345

Notes: t statistics in parentheses. $^{*}p < 0.1$, $^{**}p < 0.05$, $^{***}p < 0.01$. Robust standard errors are used.

F Appendix: A Sample of a Foreign Lobbying Report

OMB NO.1105-0002

U.S. Department of Justice
Washington, DC 20530

Supplemental Statement
Pursuant to Section 2 of the Foreign Agents Registration Act
of 1938, as amended

For Six Month Period Ending 12/31/2007
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant
   Akin Gump Strauss Hauer & Feld, LLC

   (b) Registration No.
   3492

   (c) Business Address(es) of Registrant
   1333New Hampshire Avenue, NW
   Washington, DC 20036

2. Has there been a change in the information previously furnished in connection with the following:

   (a) If an individual:
   (1) Residence address Yes ☐ No ☐
   (2) Citizenship Yes ☐ No ☐
   (3) Occupation Yes ☐ No ☐

   (b) If an organization:
   (1) Name Yes ☐ No ☑
   (2) Ownership or control Yes ☐ No ☑
   (3) Branch offices Yes ☐ No ☑

   (c) Explain fully all changes, if any, indicated in items (a) and (b) above.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4 AND 5(a).

3. If you have previously filed Exhibit C[1], state whether any changes therein have occurred during this 6 month reporting period.
   Yes ☐ No ☑

   If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

   If no, please attach the required amendment.

1 The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, U.S. Department of Justice, Washington, DC 20530.)

Formerly OBD-64

Form CRM-154
JUNE 1998

II - FOREIGN PRINCIPAL

7. Has your connection with any foreign principal ended during this 6 month reporting period?
   Yes ☐ No ☑

   If yes, furnish the following information:

Name of foreign principal	Date of termination

8. Have you acquired any new foreign principal[2] during this 6 month reporting period?
   Yes ☑ No ☐

   If yes, furnish the following information:

Name and address of foreign principal	Date acquired
Embassy of The United Arab Emirates 3522 International Ct, NW, Suite 400 Washington, DC 20008	September 2007

9. In addition to those named in Items 7 and 8, if any, list foreign principals[2] whom you continued to represent during the 6 month reporting period.

   Government of British Columbia
   Embassy of Panama
   Embassy of the Republic of Korea

10. **EXHIBITS A AND B**

    (a) Have you filed for each of the newly acquired foreign principals in Item 8 the following:

    Exhibit A[3] Yes ☑ No ☐
    Exhibit B[4] Yes ☑ No ☐

    If no, please attach the required exhibit.

    (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during the 6 month period? Yes ☐ No ☑

    If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

    If no, please attach the required amendment.

2 The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9).) A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

3 The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67), sets forth the information required to be disclosed concerning each foreign principal.

4 The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65), sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

Registered Individual: Greg Mastel

Korea

Contact	Type	Topic	Date
Michele Miranda, Counsel, Office of Sen. Ron Wyden	Meeting	U.S.-Korea Free Trade Agreement	10/15/2007
Jonathan Hale, Counsel, Office of Sen. Maria Cantwell; Meeting with Rich Harper, Legislative Assistant, Office of Sen. Diane Feinstein	Meeting	U.S.-Korea Free Trade Agreement	10/22/07
Steve Pfrang, Legislative Assistant, Office of Rep. Vito Fossella; Allie O'Donnell, Legislative Director, Office of Rep. Jim Matheson; Patricia Villareal, Legislative Director, Office of Solomon Ortiz	Meeting	U.S.-Korea Free Trade Agreement	11/2/2007
Jessica Lemos, Legislative Assistant, Office of Rep. Brian Baird	Meeting	U.S.-Korea Free Trade Agreement	11/13/2007
Dana O'Brien, Legislative Assistant, Office of Rep. Skelton	Meeting	U.S.-Korea Free Trade Agreement	11/14/2007
Mark De La Iglesia, Legislative Assistant, Office of Rep. Adam Smith	Meeting	U.S.-Korea Free Trade Agreement	11/20/2007
Gregg Sheiowitz, Legislative Assistant, Office of Rep. Crowley; Andy Jones, Counsel, Office of Rep. Hinojosa; and Roberto Valencia, Legislative Assistant, Office of Rep. Jim Moran; Lunch meeting with Claudia Bridgeford, International Trade Policy Advisor, Senate Finance Committee - Minority Staff	Meeting	U.S.-Korea Free Trade Agreement	11/28/2007
Demetrios Marantis, Senate Finance Committee	Phone Call	U.S.-Korea Free Trade Agreement	11/12/2007
Demetrios Marantis, Senate Finance Committee	Phone Call	U.S.-Korea Free Trade Agreement	12/6/2007