

July 15, 2022

Amy Liu, Interim President
Brookings Institution
1775 Massachusetts Ave. NW
Washington, D.C. 20036

Dear Ms. Liu,

I am writing to request information about how the former President of the Brookings Institution, who was at the time a Brookings distinguished fellow,¹ was allowed to engage in potentially illegal lobbying activities, and about how the think tank will ensure that, in the future, its officials and leaders are not involved in illegal or inappropriate lobbying.

Last month press reports indicated that retired Marine Corps General John R. Allen, who was president of Brookings from November 2017 until he resigned last month soon after the allegations were made public,² was under investigation by the Federal Bureau of Investigation (FBI) for “ma[king] false statements and withh[olding] ‘incriminating’ documents about his role in an illegal foreign lobbying campaign on behalf of the wealth Persian Gulf nation of Qatar.”³ Federal court filings further disclosed that Allen, then a Brookings senior fellow, “used his official email account at the think tank for some of his Qatar-related communications.”⁴

Press reports indicate Allen was simultaneously “pursuing multi-million dollars business deals with the government of Qatar” while orchestrating a behind-the-scenes influence campaign where he “played an important role in shifting the U.S.’s response.”⁵ Authorities say Allen “lobbied then-National Security Advisor H.R. McMaster to have the Trump administration adopt more Qatar-friendly tone.”⁶ In one instance then-Secretary of State Rex Tillerson issued a statement calling for restraint the same day Allen made that request on behalf of Qatar to McMaster.⁷ Allen has not been charged with a crime, but the documents containing the allegations about him also reportedly indicate that he “joined in the secret lobbying plan along

¹ Brookings, “John R. Allen,” <https://www.brookings.edu/author/john-r-allen/>.

² CNN, “Retired Marine Gen. John Allen resigns as Brookings president amid FBI probe,” Jeremy Herb, June 13, 2022, <https://www.cnn.com/2022/06/13/politics/john-allen-brookings-institution-resignation/index.html>.

³ Associated Press, “FBI seizes retired general’s data related to Qatar lobbying,” Alan Suderman and Jim Mustian, June 7, 2022, <https://apnews.com/article/politics-us-news-think-tanks-nato-ap-top-5c30827587d2295012549d5d65fc806e>.

⁴ *Id.*

⁵ *Id.*

⁶ *Id.*

⁷ Application for a Warrant, Case No. 2:22-MJ-1530, p. 24, <https://int.nyt.com/data/documenttools/dc-lobby-courtdocuments/df4dbfe3fd26ed7a/full.pdf>.

with Richard G. Olson, a former United States ambassador to the United Arab Emirates and Pakistan,” who “has agreed to plead guilty for participating in the Qatari lobbying effort in violation of a prohibition on such activity during the first year after leaving diplomatic service.”⁸ Emails indicate Allen sought a \$20,000 speaker’s fee in return for his services though he has denied receiving any compensation.⁹

While Allen has resigned, this incident raises broader concerns about conflicts of interest and foreign influence at Brookings, and the impact that these financial ties with foreign entities may have on Brookings Institution staff and the work they do. The Brookings Institution claims to be “devoted to independent, in-depth research.”¹⁰ But Brookings’ agreement with Qatar’s Ministry of Foreign Affairs to establish its Doha Center appears to have significantly compromised the organization’s independence. The memorandum of understanding—part of an agreement for Qatar to provide Brookings \$14.8 million over four years¹¹—included Brookings committing to the Ministry that the Doha Center would “engage in regular consultation,” submit an annual budget, and provide an “agenda for programs that will be developed by the Center.”¹² It also required the Doha Center to consult with the Ministry “prior to making any material modifications, additions, and/or amendments” to its planned activities.¹³ While Brookings claims its “institutional independence is rooted in the individual independence of its scholars,” at least one fellow “said he had been told during his job interview that he could not take positions critical of the Qatari government in papers.”¹⁴ And the reports that Allen was lobbying for and “pursuing multi-million dollars business deals with the government of Qatar” – without disclosing any of these financial ties – casts doubt not just on Allen’s supposed independence, but also that of all other Brookings scholars.¹⁵ All of those scholars would benefit from adopting strong institutional policies to safeguard their independence.

This is not the first time I have raised concerns regarding the Brookings Institution’s failure to address and disclose financial conflicts of interest. In 2015 I wrote to then-President Strobe Talbott that the funders of research by Dr. Robert Litan, a Brookings Nonresident Senior Fellow – and the fact that these financial industry backers were given editorial control of his work

⁸ New York Times, “Retired General Investigated Over Undisclosed Lobbying for Qatar,” Mark Mazzetti and David D. Kirkpatrick, June 7, 2022, <https://www.nytimes.com/2022/06/07/us/politics/general-john-allen-lobbying-qatar.html>.

⁹ Politico Magazine, “He Tried to Reform the Way a Top D.C. Think Tank Gets Money. Now the FBI Is Looking Into Him,” Michael Schaffer, June 17, 2022, <https://www.politico.com/news/magazine/2022/06/17/john-allen-brookings-institution-fbi-qatar-00040380>.

¹⁰ Brookings, “About Us,” <https://www.brookings.edu/about-us/>.

¹¹ New York Times, “Foreign Powers Buy Influence at Think Tanks,” Eric Lipton, Brooke Williams, and Nicholas Confessore, September 6, 2014, <https://www.nytimes.com/2014/09/07/us/politics/foreign-powers-buy-influence-at-think-tanks.html>.

¹² Politico, “Brookings Doha Center Establishment Agreement: Memorandum of Association,” January 1, 2007. <https://www.documentcloud.org/documents/22062334-20070101-brookings-doha-center-establishment-agreement-memorandum-of-association?responsive=1&title=1>.

¹³ *Id.*

¹⁴ Brookings, “About Us,” <https://www.brookings.edu/about-us/>; New York Times, “Foreign Powers Buy Influence at Think Tanks,” Eric Lipton, Brooke Williams, and Nicholas Confessore, September 6, 2014, <https://www.nytimes.com/2014/09/07/us/politics/foreign-powers-buy-influence-at-think-tanks.html>.

¹⁵ Associated Press, “FBI seizes retired general’s data related to Qatar lobbying,” Alan Suderman and Jim Mustian, June 7, 2022, <https://apnews.com/article/politics-us-news-think-tanks-nato-ap-top-5c30827587d2295012549d5d65fc806e>

products on the Department of Labor Financial Adviser Conflict of Interest rule – called into question the independence of his research and its conclusions.¹⁶ Investigations by the *New Republic*, the *New York Times*, *Washington Post*, and the *Intercept* have also identified instances where think tank scholars sought to influence policymaking while failing to disclose significant financial conflicts of interest.¹⁷

In response to these investigations the House of Representatives instituted rules to expand congressional witness disclosure requirements to include foreign funding and lobbying registration.¹⁸ But the continued flouting of lobbying laws indicates the need for stronger enforcement of lobbying and revolving-door laws and more stringent rules. My *Anti-Corruption and Public Integrity Act* would ban any foreign lobbying by Americans, require think tanks to disclose donors who bankroll lobbying materials and rulemaking comments, and reveal whether donors reviewed or edited documents.¹⁹ My *Department of Defense Ethics and Anti-Corruption Act* would require explicit approval of the Secretary of State for all former senior officials of the White House and Departments of State, Defense, and Treasury who seek paid work for a foreign government or non-governmental foreign entity, and bans former senior Pentagon officials from lobbying and behind-the-scenes lobbying the Department of Defense for four years.²⁰

The American people deserve to know how foreign countries and corporations buy influence over the federal government, and through think tanks that are designed to influence federal government decisions and actions. Given the questions raised by all of these reports, I am writing to seek information on the efforts by Brookings to prevent Allen and other researchers from violating the law or inappropriately or unethically aiding foreign governments. I therefore ask for you to provide answers to the following questions by no later than July 29, 2022:

¹⁶ Letter from Senator Elizabeth Warren to Brookings Institution President Strobe Talbott, September 28, 2015, https://www.warren.senate.gov/files/documents/2015-9-28_Warren_Brookings_ltr.pdf.

¹⁷ The New Republic, “Meet the Think Tank Scholars who are also Beltway Lobbyists,” Brooke Williams and Ken Silverstein, May 10, 2013, <https://newrepublic.com/article/113158/report-dozens-lobbyists-work-think-tank-scholars>; New York Times, “Foreign Powers Buy Influence at Think Tanks,” Eric Lipton, Brooke Williams, and Nicholas Confessore, September 6, 2014, <https://www.nytimes.com/2014/09/07/us/politics/foreign-powers-buy-influence-at-think-tanks.html>; Washington Post, “At fast-growing Brookings, donors may have an impact on research agenda,” Tom Hamburger and Alexander Becker, October 30, 2014, https://www.washingtonpost.com/politics/at-fast-growing-brookings-donors-help-set-agenda/2014/10/30/a4ba4e8e-48ef-11e4-891d-713f052086a0_story.html; New York Times, “How Think Tanks Amplify Corporate America’s Influence,” Eric Lipton and Brooke Williams, August 7, 2016, <https://www.nytimes.com/2016/08/08/us/politics/think-tanks-research-and-corporate-lobbying.html>; The Intercept, “Hacked Emails Show UAE Building Close Relationship with D.C. Think Tanks that Push its Agenda,” Zaid Jilani and Alex Emmons, July 30, 2017, <https://theintercept.com/2017/07/30/uae-yousef-otaiba-cn-as-american-progress-michele-flournoy-drone/>; New York Times, “How 2 Gulf Monarchies Sought to Influence the White House,” David Kirkpatrick and Mark Mazzetti, March 21, 2018, <https://www.nytimes.com/2018/03/21/us/politics/george-nader-elliott-broidy-uae-saudi-arabia-white-house-influence.html>.

¹⁸ The Hill, “New rules target House witnesses,” Megan R. Wilson, January 13, 2015, <https://thehill.com/business-a-lobbying/business-a-lobbying/229286-new-disclosure-rules-target-house-witnesses/>; Office of Representative Katie Porter, “Porter, McGovern Announce New Disclosure Requirements for Congressional Witnesses,” press release, January 4, 2021, <https://porter.house.gov/news/documentsingle.aspx?DocumentID=225>.

¹⁹ Office of U.S. Senator Elizabeth Warren, “ANTI-CORRUPTION AND PUBLIC INTEGRITY ACT – SENATOR ELIZABETH WARREN,” <https://www.warren.senate.gov/imo/media/doc/Master%20Summary%20of%20Anti%20Corruption%20Act%20-%20FINAL.pdf>.

²⁰ Congress.gov, “S. 2396,” <https://www.congress.gov/117/bills/s2396/BILLS-117s2396is.pdf>.

1. What, exactly, is the Brookings policy with regard to its fellows, or its employees, receiving compensation or engaging in other financial relationships with foreign governments or private sector entities?
2. When did Brookings become aware of any fees the Qatari government paid directly to Allen or any other Brookings fellows, employees, or contractors?
 - a. Did Brookings require disclosure of any fees the Qatari government paid directly to Allen at the time that he was a distinguished fellow at Brookings?
 - b. Did Brookings require disclosure of any fees the Qatari government paid directly to Allen at the time that he was Brookings president, or when he was in discussions to become president?
3. When did Brookings become aware of any other business relationship that Allen had with, on behalf of, or brokered by the Qatari government?
 - a. Did Brookings require disclosure of any other business relationship that Allen had with, on behalf of, or brokered by the Qatari government at the time that he was a distinguished fellow at Brookings?
 - b. Did Brookings require disclosure of any other business relationship that Allen had with, on behalf of, or brokered by the Qatari government fees at the time that he was Brookings president, or when he was in discussions to become President?
4. Does Brookings have any policy requiring public disclosure of outside compensation paid to its employees, or any business relationships they may have with foreign governments or private sector entities?
5. Does Brookings have in place any other memorandums of understanding (MOU) with other foreign governments? If so, please provide a list of all such MOUs, including
 - a. The country providing the financial support, and the amount of support provided.
 - b. The terms and conditions of the MOU, including any term or condition that may dictate control or allow input into the choice of topics or editorial control of material by Brookings staff or fellows.
6. What is Brookings' policy regarding editorial input, agenda review, or budget review from outside entities with a financial stake in the issues under consideration for studies published by Brookings or Brookings-affiliated researchers?
7. Has Brookings initiated any independent reviews in the past 10 years to determine whether its activities are in compliance with the *Lobbying Disclosure Act* and the *Foreign Agents Registration Act*? If so, what were the results of these reviews?
8. What additional actions has Brookings taken since the allegations regarding Allen were made public?

Sincerely,



Elizabeth Warren
United States Senator