



INFILTRATING AMERICA

How the United Arab Emirates Launched
an Unprecedented Political Interference
Campaign in the United States

REPORT

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INTRODUCTION

For years, one foreign dictatorship has overseen an unprecedented interference effort aimed at the heart of the U.S. political process, unleashing squadrons of lobbyists while launching illicit campaigns that reached directly into the highest ranks of the American government. This dictatorship did so while bankrolling a broad array of American non-profits, including some of the U.S.'s leading think tanks, in a gargantuan effort at laundering the country's reputation and directing American policy in the process. Along the way, this dictatorship has hired fleets of former American officials – especially military officials – to aid in its military aggrandizement, to both deflect criticism and strengthen the dictatorship's hold on power.

And this dictatorship did all of this while simultaneously being accused of both torturing political prisoners – including tying victims “to a spit like a roast” over an open flame – and funding private Russian military organizations currently slaughtering Ukrainians.¹ Preventing anything resembling free speech or political opposition, the dictatorship has likewise transformed into one of the key jurisdictions for trans-national money laundering, attracting oligarchs and dictatorial fellow-travelers from around the world to launder untold wealth and dodge American sanctions.

Any of these actions – the illicit lobbying and the secret funding, the torture regimes and sanctions evasions, the political interference and the links to war criminals in Russia – would have made most regimes effectively anathema to politicians in Washington. But this regime isn't based in Russia, or in China, or even in places like Hungary or Turkey.

It is, instead, based in one of the U.S.'s supposedly key allies in the Persian Gulf: the United Arab Emirates, whose regime has overseen arguably the most successful political interference operations in the U.S. over the past decade – and which has escaped scrutiny and high-profile investigations, all while strengthening its ties with Washington in the process.

As this report will detail, the UAE has crafted a 21st-century playbook for political infiltration and influence, which other dictatorships are eager to mimic. And absent significant reforms in key sectors, there's little reason other dictatorships won't soon be following the UAE's lead, tilting American policy toward their ends, without anyone being aware.

¹ Maggie Michael, “In Yemen's Secret Prisons, UAE Tortures and US Interrogates,” AP News, August 13, 2021, <https://apnews.com/article/middle-east-business-prisons-only-on-ap-yemen-4925f7f-0fa654853bd6f2f57174179fe>; Amy Mackinnon and Jack Detsch, “Pentagon Says UAE Possibly Funding Russia's Shadowy Mercenaries in Libya,” Foreign Policy, November 30, 2020, <https://foreignpolicy.com/2020/11/30/pentagon-trump-russia-libya-uae/>

KEY FINDINGS

1

LOBBYING CAMPAIGNS

The United Arab Emirates has overseen the most successful lobbying campaign in the U.S. over the past decade, spending tens of millions of dollars on dozens of organizations to launder the dictatorship's image among policymakers in Washington and push for more pro-UAE policies writ large. These lobbyists have further used campaign financing loopholes to funnel significant sums directly to members of the U.S. Congress, both legally and illicitly.

2

INFILTRATION

The UAE, including the highest rungs of the country's dictatorial leadership, oversaw arguably the most successful infiltration of an American presidential administration in decades, and potentially ever, transforming multiple members of the U.S. president's inner circle into effective Emirati agents – all without the White House's or the American public's knowledge.

3

HIGH-LEVEL DONATIONS

The UAE has become one of the most prominent donors to American think tanks, directing millions of dollars in opaque donations toward some of the key non-profit institutes shaping American policy.² The UAE has likewise donated millions to America's leading universities, whitewashing the Emirati dictatorship's image in the process.

4

FORMER MILITARY OFFICERS

The UAE has spearheaded a new practice of hiring former leading American military officials to not only strengthen the dictatorship's military capabilities, but act as effective mouthpieces for American audiences – all while the Emirati dictatorship continues to deny basic democratic protections in the country, and reportedly works closely with American adversaries like Russia and China.

² Ben Freeman, "Foreign Funding of Think Tanks in America," Center for International Policy, https://static.wixstatic.com/ugd/3ba8a1_4f06e99f35d4485b801f8dbfe-33b6a3f.pdf

RECOMMENDATIONS

- 1** **The U.S. should pass key pieces of legislation aimed at increased oversight of American lobbyists working on behalf of dictatorial regimes abroad**, allowing these regimes to dodge criticism and circumvent the American diplomatic process. American policymakers must also consider passing legislation to ban American figures from working as effective mouthpieces for foreign dictatorships, including the UAE.
- 2** **The U.S. should pass legislation requiring American non-profits to disclose significant donations from foreign entities**, and especially from foreign dictatorships.
- 3** **The U.S. should increase the disclosure requirements and enforcement regarding American universities accepting funds from foreign dictatorships**, and must consider implementing transparency requirements for think tanks receiving similar funds.
- 4** **The U.S. should consider barring former American military officials**, especially those of the highest ranks, from working, consulting, or lobbying for foreign dictatorships.
- 5** **The U.S. should consider applying direct sanctions in the UAE**, especially on those credibly accused of corruption and human rights violations, and especially on Emirati entities aiding in sanctions evasions.
- 6** **The U.S. should release a recent intelligence report further detailing the UAE's political interference and infiltration efforts**. The U.S. must then begin organizing congressional hearings on the findings therein – and the administration must authorize a wholesale reexamination of the U.S.'s relations with the Emirati dictatorship.

A 21ST-CENTURY PLAYBOOK

In 2017, a bombshell report in the Associated Press revealed a system of secret prisons in Yemen, overseen by a foreign dictatorship and dedicated to holding hundreds of suspected militants. Among the “terrors” inflicted on the prisoners – all of whom were held without any due process, and in contravention of basic international law – was a device that captors described as a “grill.” Even in the annals of modern torture the device was particularly barbaric. As the AP described it, the “victim is tied to a spit like a roast and spun furiously within a circle of fire” – and is, quite literally, grilled alive.³

A few years later, American intelligence officials compiled a classified report on the “extensive efforts” of this same foreign dictatorship. As U.S. intelligence officials concluded, this dictatorship had launched a campaign aimed at “manipulat[ing] the American political system.”⁴ Among the tactics detailed were gargantuan sums directed toward lobbyists, who then sought to push the dictatorship’s agenda in Washington. Likewise, intelligence officials determined that this dictatorship had simultaneously funneled hundreds of millions of dollars more to American think tanks and universities, seeking to whitewash the regime’s reputation in the process.

In both cases, the findings were stark, with deep documentation and sourcing. And in both cases, the foreign dictatorship in question was the same. It was the United Arab Emirates (UAE) that oversaw a network of black sites, reportedly dedicated to “abuse and torture” of those held, including being roasted alive.⁵ And it was the UAE that simultaneously launched a breathtaking lobbying campaign in Washington that roped in some of America’s leading figures, as well as cultural and political organizations, in the process – a campaign that was arguably the most effective and boldest of any seen in the past decade.

³ Michael, “In Yemen’s Secret Prisons, UAE Tortures and US Interrogates.”

⁴ John Hudson, “US Intelligence Report Says Key Gulf Ally Meddled in American Politics,” The Washington Post, November 12, 2022, <https://www.washingtonpost.com/national-security/2022/11/12/uae-meddled-us-politics-intel-report/>

⁵ The Associated Press, “UN Experts Accuse Saudi Arabia, UAE of War Crimes in Yemen | CBC News,” CBCnews, August 28, 2018, <https://www.cbc.ca/news/world/saudi-united-arab-emirates-yemen-un-war-crimes-1.4801407>

Indeed, while countries like Russia have gained much of the attention as it pertains to political interference in the U.S. in recent years, Moscow hasn't seen nearly as much success in redirecting American policy or in laundering its own image as the UAE. If anything, the UAE's political influence and interference efforts, which began in earnest in the mid-2010s, are arguably the most successful of the era – not least because America's relationship with Emirati partners has only grown deeper as a result of the UAE's political infiltration projects. This conclusion may be unsurprising. After all, the UAE's donations to think tanks and universities, as well as its lobbying expenditures and hiring of former U.S. military officials, far outstrips any comparable practices from Moscow or Russian proxies.

But unlike regimes in places like Moscow or Beijing, the UAE's brutality and increasingly dictatorial rule have largely escaped both scrutiny and criticism. This comes despite the fact that the Emirati regime doesn't tolerate dissent, outlawing political opposition and protest alike, and effectively outlawing free media.⁶ And all of this has taken place while the UAE has implemented one of the most heinous torture regimes in existence, reportedly bankrolling the leading Russian private military company fighting for the Kremlin in Ukraine – and all while the UAE has transformed into a safe hub for oligarchs, kleptocrats, and dictatorial regimes elsewhere seeking to escape sanctions, especially those implemented by the U.S.

As this report will detail, the UAE's political interference operations in the U.S. began in earnest in the mid-2010s. In the years since, the operations have grown in both scope and scale, as well as in boldness and efficiency.

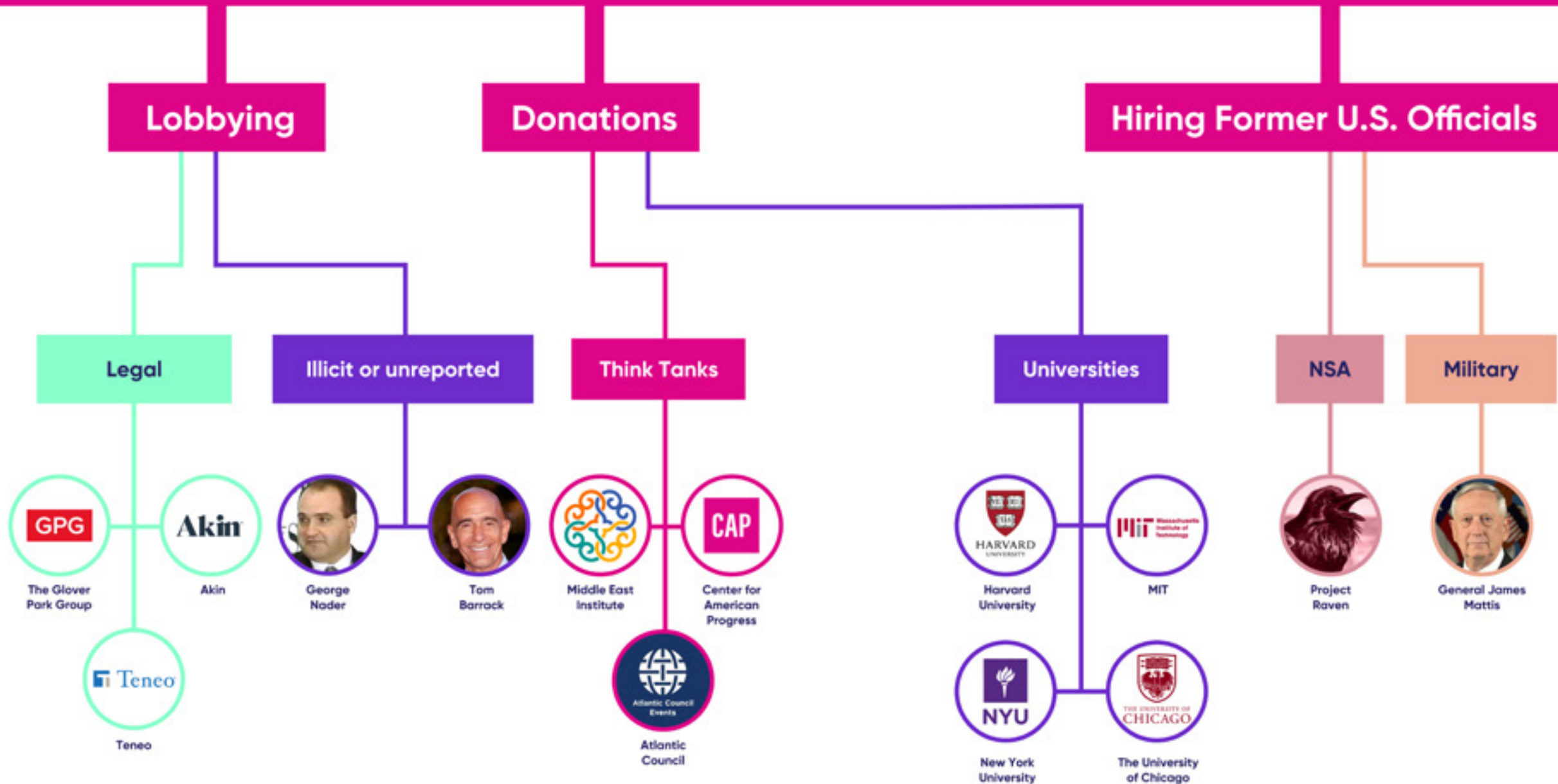
The UAE's array of political interference and infiltration tactics covers three primary areas. Firstly, the UAE has relied on a breathtaking lobbying campaign in Washington, including multiple instances of illicit or unreported lobbying, seeding effective Emirati agents throughout the highest ranks of the American government. Secondly, the UAE has likewise launched a remarkable funding operation aimed at

showering gifts and donations at America's leading cultural institutions, including most especially think tanks and universities. And thirdly, the UAE has begun recruiting dozens of former American military officials to act not only as strategic advisors, but as effective proxies in Washington, circumventing lobbying regulations that much further.

All told, the UAE's political interference campaign – aimed at redirecting American policy, laundering the regime's reputation, and smothering any criticism of its brutality and tyranny in the process – has proven a remarkable success. Far more than Russia or China, and arguably more than any other dictatorship extant, the Emirati regime's efforts at infiltrating Washington have been met not with shock and consternation, but with success after success, entrenching the Emirati regime that much further – and crafting a playbook that other foreign dictatorships have begun to follow.

⁶ As a case in point, Reporters Without Borders assesses that the UAE's media freedoms are approximately the same as places like Somalia or Equatorial Guinea. "Index," Reporters Without Borders Index, accessed September 27, 2023: <https://rsf.org/en/index>

UAE Influence and Infiltration Efforts



George Nader photo via C-Span | Tom Barrack Photo via twitter.com @TomBarrackJr | Project Raven Photo CC BY 2.0 @Grand Canyon NPS



1 | LOBBYING AND LAW-BREAKING

Following the end of the Cold War, a new lobbying practice began to mushroom around Washington, allowing foreign regimes – and especially foreign dictatorships – to access and influence American policymakers. Rather than work directly for clients in the U.S., American lobbying, public relations, consultancy, and law firms began to turn their gaze outward – and soon began signing up to represent, and lobby on behalf of, foreign dictatorships around the world.

While this foreign lobbying industry has seen renewed scrutiny in recent years, it is still largely overlooked as a force for crafting and upending policy in Washington, and as a means of whitewashing heinous crimes attached to assorted regimes. Subject to scant oversight and few regulations – and given the deep, kleptocratic pockets attached to malign regimes around the world – it is little surprise that dictatorship after dictatorship has turned to these American firms to spin their messages, to push preferred policies, and to target unsuspecting policymakers.

And while countries like Russia and China have received outsized media coverage for their lobbying operations in Washington, no other dictatorship can match the rate at which the UAE has bankrolled America's foreign lobbying industry. In return for staggering sums of Emirati wealth, these U.S. firms have spent years massaging their pro-UAE messaging – and helping smother any attendant criticism of the Emirati regime's brutality.

Many of these lobbying efforts remain opaque, conducted as they are in private offices and private conversations. But thanks to the U.S. regulations, we have at least some idea of what the American lobbyists working on behalf of the UAE have achieved for their dictatorial clients.

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Not only are the UAE's expenditures far greater than related Russian or Chinese efforts per capita, but as the pro-transparency OpenSecrets group found, Emirati entities spent more than any other dictatorship in 2022 per capita on lobbying efforts.

Documents compiled by the U.S.'s Foreign Agents Registration Act (FARA), which requires foreign lobbyists to disclose their work and payments on behalf of foreign governments and foreign political parties, reveal that the UAE has spent over \$140 million on lobbying efforts since 2017.⁷ Among those servicing the Emirati dictatorship are America's leading public relations firms, such as Glover Park Group, and prestigious law firms, such as Akin Gump. These firms have received millions of dollars to directly lobby American policymakers, pressure American journalists and outlets, or spin pro-UAE talking points more broadly, all to help the Emirati entities expand their influence in Washington and entrench its dictatorship back home.

Indeed, the UAE has compiled what analyst Ben Freeman described as a "small army of U.S.-based lobbyists," who have "played a role ... in nearly every aspect of U.S. foreign policy in the Middle East."⁸ Dozens of American firms and organizations conducted thousands of meetings and conversations on behalf of their Emirati clients, all in order to best spin pro-UAE messaging.

Not only are the UAE's expenditures far greater than related Russian or Chinese efforts per capita, but as the pro-transparency OpenSecrets group found, Emirati entities spent *more than any other dictatorship* in 2022 per capita on lobbying efforts.⁹ Indeed, Emirati

⁷ OpenSecrets, "Foreign Lobby Watch: United Arab Emirates," 2023, <https://www.opensecrets.org/fara/countries/1?cycle=2022>. We are cognizant the UAE's population of 9.3 million is a small fraction of the populations of China and Russia, but the per capita metric is still useful to highlight just how significant the UAE's expenditures have been. Given how poorly FARA and other related lobbying regulations have been enforced in the U.S., this figure should be taken as a minimum, and doesn't incorporate related funding of think tanks, universities, and other American entities.

⁸ Ben Freeman, "The Emirati Lobby in America," Quincy Institute, December 5 2022, <https://quincyinst.org/report/the-emirati-lobby-in-america/>

⁹ China spent more on lobbying overall at over \$62 million, but the UAE's total of nearly \$40.1 million was a far higher

sources appear to be growing their lobbying budgets every year, exploding from \$10.5 million in 2016 to over \$40 million in 2022 – the highest number ever seen out of the UAE.¹⁰

Lobbying loopholes

Still, these patterns aren't necessarily unique to the UAE; other regimes, including an array of other dictatorships, also hire similar American lobbying, public relations, consultancy, and law firms, all of it perfectly legally. Far more concerning, however, is that the UAE appears to have discovered a workaround to inject funds directly into not just the pockets of America's most prestigious lobbying entities but into the American political process itself.

As Freeman and other researchers have detailed, after receiving funds from Emirati sources, the UAE's American lobbyists often redirect significant sums directly to the congressional officials they are lobbying. As Freeman wrote, "In many cases these contributions went to the exact same members of Congress these firms were contacting on behalf of their Emirati clients."¹¹

It remains illegal for foreign nationals to contribute directly to American politicians, and there is no allegation that these lobbyists have committed any crimes. However, given the fact that the Americans working as lobbyists for the UAE are allowed to directly fund the congressional officials they're lobbying – even while they're being paid by the UAE – there is clear concern that these lobbyists are effectively acting as financial proxies for the regime, and can effectively buy the support of the officials they lobby on behalf of the Emirati dictatorship.

expenditure rate per capita. Foreign Lobby Watch, OpenSecrets, 2023, <https://www.opensecrets.org/fara?cycle=2022>

¹⁰ OpenSecrets, "Foreign Lobby Watch: United Arab Emirates," 2023, <https://www.opensecrets.org/fara/countries/1?cycle=2022>

¹¹ Ben Freeman, "The Emirati Lobby in America," Quincy Institute, December 5, 2022, <https://quincyinst.org/report/the-emirati-lobby-in-america/> Not all of the lobbying groups work directly for the Emirati regime. For instance, Teneo Strategy LLC represents the Salama bint Hamdan Al Nahyan Foundation, founded by the wife of the UAE's de facto dictator, Mohammad bin Zayed. See documents filed in the U.S.'s FARA database, such as: <https://efile.fara.gov/docs/6698-Exhibit-AB-20220331-15.pdf>

Moreover, this concern is hardly unwarranted – not least because in 2022 an American national named George Nader pleaded guilty for helping the UAE “pump millions of dollars in illegal campaign contributions in the U.S. political system,” primarily during the 2016 campaign.¹² As prosecutors laid out, Nader was working in concert with the UAE’s dictatorship to hide millions of dollars in campaign donations from American authorities. Moreover, Nader reported directly to the UAE’s de facto leader, then-Crown Prince Mohammad bin Zayed. Nader was, as American officials said, a “senior advisor” to the UAE’s leadership, and worked to open doors in the White House to Emirati officials – all of it without the American public or other American officials being aware of his financial links.¹³

It was, all told, one of the most egregious campaign finance violations ever committed by a foreign regime – and it was a clear illustration of how the UAE uses American lobbyists for its own benefit.¹⁴

Illicit infiltration

The UAE’s lobbying efforts aren’t limited only to lobbying shops and law firms, unfortunately. Instead, they’ve reached directly into the White House, in one of the most successful foreign infiltration efforts the U.S. has ever suffered.

Beginning in 2016, American financier Tom Barrack served as President Donald Trump’s key economic and foreign policy adviser. But as federal authorities later detailed, Barrack was simultaneously liaising directly with Emirati officials – and using his links with the UAE regime to push pro-UAE policies from within the White House. As investigators laid out, Barrack’s efforts were steered by none other than the

¹² Matthew Cole, “UAE Adviser Illegally Funneled Foreign Cash into Hillary Clinton’s 2016 Campaign,” *The Intercept*, January 26, 2022, <https://theintercept.com/2022/01/16/uae-2016-election-trump-clinton-george-nader/>

¹³ David Voreacos and Bob Van Voris, “George Nader Faces New Child Pornography Charges,” *Bloomberg.com*, June 3, 2019, <https://www.bloomberg.com/news/articles/2019-06-03/uae-adviser-george-nader-charged-in-child-pornography-case>

¹⁴ David D Kirkpatrick and Mark Mazzetti, “How 2 Gulf Monarchies Sought to Influence the White House,” *The New York Times*, March 21, 2018, <https://www.nytimes.com/2018/03/21/us/politics/george-nader-el-liott-broidy-uae-saudi-arabia-white-house-influence.html>

UAE’s de facto dictator, who also helped guide Nader’s work.¹⁵

According to prosecutors, Barrack’s efforts on behalf of the UAE ran the gamut. He wrote pro-UAE op-eds for unsuspecting American audiences, and appeared on multiple television interviews to push pro-UAE policies.¹⁶ But his greatest impact came within the White House. As detailed in a 46-page indictment, Barrack covertly changed the U.S. president’s speeches in order to praise the Emirati dictatorship, lobbying along the way for more pro-UAE policy and staffing decisions. Barrack also covertly passed internal White House discussions to the UAE regime, without the White House being aware. Barrack even gathered a so-called “wish list” of policy decisions from Emirati officials that they wanted the U.S. government to implement, setting up a “secure messaging” stream to communicate without detection.¹⁷

And Barrack did all of this without ever disclosing his links to the UAE. His work for the Emirati regime, declared prosecutors, “strikes at the very heart of [American] democracy.”¹⁸

At first blush, there was no clear reason for Barrack to push pro-UAE policies. Prosecutors never detailed how much money he directly made from the arrangement, if any. But while he lobbied American officials, his private equity firm simultaneously raised \$1.5 billion from the UAE and its close ally, Saudi Arabia.¹⁹

¹⁵ Office of Public Affairs, “Former Advisor to Presidential Candidate among Three Defendants Charged with Acting as Agents of a Foreign Government,” Office of Public Affairs, July 13, 2022, <https://www.justice.gov/opa/pr/former-advisor-presidential-candidate-among-three-defendants-charged-acting-agents-foreign>

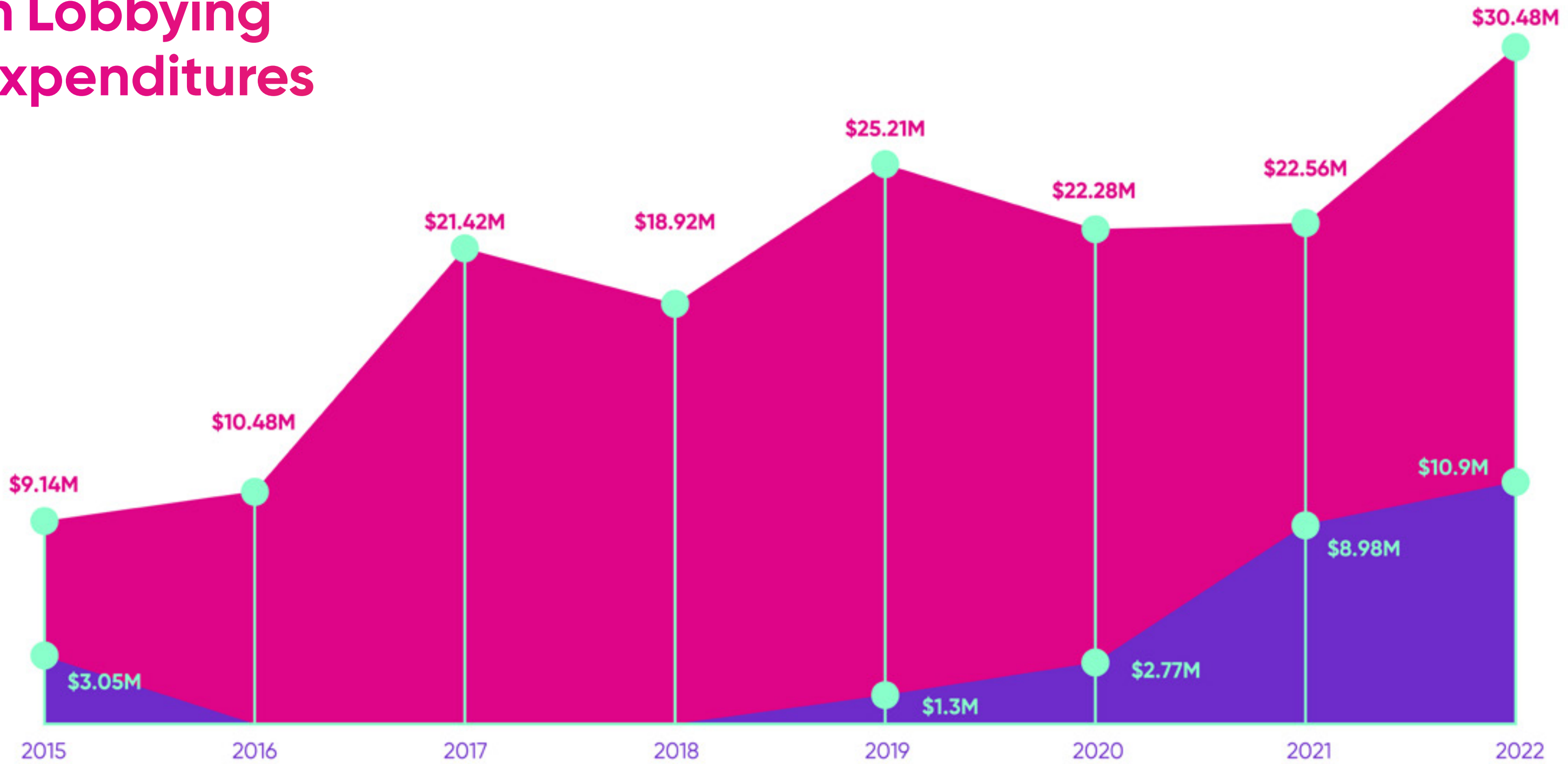
¹⁶ Thomas J. Barrack Jr., “What the Middle East Needs Now from America,” *Fortune*, October 22, 2016, <https://fortune.com/2016/10/22/middle-east-isis-syria/>

¹⁷ Office of Public Affairs, “Former Advisor to Presidential Candidate among Three Defendants Charged with Acting as Agents of a Foreign Government,” Office of Public Affairs, July 13, 2022, <https://www.justice.gov/opa/pr/former-advisor-presidential-candidate-among-three-defendants-charged-acting-agents-foreign>

¹⁸ Sharon Lafraniere and William K Rashbaum, “Thomas Barrack, Trump Fund-Raiser, Is Indicted on Lobbying Charge,” *The New York Times*, July 20, 2021, <https://www.nytimes.com/2021/07/20/us/thomas-barrack-trump-indicted.html>

¹⁹ *Ibid.*

UAE's Growth in Lobbying Expenditures



■ Government Spending
 ■ Non-Government Spending



Source: OpenSecrets, "Foreign Lobby Watch: United Arab Emirates," 2023, <https://www.opensecrets.org/~fara/countries/?cycle=2022>

As one of Barrack's Emirati contacts told him, the regime "loved" his work.²⁰ And why wouldn't they? They'd effectively snuck an ally into the White House.

²⁰ Rebecca Davis O'Brien, "Trump Adviser's Trial May Shed Light on Foreign Influence Campaigns," The New York Times, September 19, 2022, <https://www.nytimes.com/2022/09/19/nyregion/trump-adviser-tom-barrack-trial.html>. Barrack was eventually acquitted of formal charges on breaking foreign lobbying laws, claiming that his "involvement in Middle East affairs sprang from his deep belief, as a Lebanese-American, that closer American ties to the Gulf States would advance political stability in the region and be beneficial to all sides – a philosophy that predated his relationship with the UAE." Kevin J. O'Brien, "Why Thomas Barrack's acquittal is good news for Trump," Reuters, November 22, 2022, <https://www.reuters.com/legal/legalindustry/why-thomas-barracks-acquittal-is-good-news-trump-2022-11-22/>

2 | THINK TANKS AND UNIVERSITIES



Thanks to publicly accessible databases like FARA, there is in the U.S. at least a semblance of transparency as it pertains to foreign regimes hiring lobbying, public relations, consultancy, and law firms to push their messaging and silence related criticism. However, over the past decade foreign regimes have pursued a secondary means of whitewashing their reputations, reaching the upper echelons of America’s policy-making apparatus, and pursuing their own interests, without any attendant transparency. Their method has been simple: massive, unchecked donations to American non-profits – including leading think tanks and universities.

These multi-million-dollar donations are often clouded in secrecy, without any details of related contracts, commitments, or potential influence revealed. And since think tanks and universities routinely fail to disclose even the total amounts of these donations, we still have little idea how much foreign regimes, and especially dictatorships like the UAE, have given to America’s most prestigious cultural and educational institutes in recent years.

What we do know, thanks to a number of investigations and analyses, is that the sums of money foreign dictatorships have flooded into America’s leading think tanks and universities are enormous – and proceeded to launder their reputations, and open untold doors, in the process.

Creating a pro-UAE policy at American think tanks

Over the past few years, American think tanks have provided some of the most high-profile events and conversations regarding the threats of foreign interference in U.S. policy, focusing especially on regimes like Russia and China. Impressively, however, there hasn’t been a single event dedicated to the UAE, which has arguably overseen the most successful foreign interference campaign over the same period.

The absence of any events focused on UAE interference is glaring. But it may have a simple explanation: the UAE remains one of the largest donors to many of America’s leading think tanks, providing much-needed funds to the non-profits that help steer American policy.

Indeed, one of the most popular destinations for Emirati funds are these kinds of think tanks, which often house America’s leading scholars and practitioners of for-

foreign policy, and which routinely author policy papers that U.S. officials follow both domestically and internationally. Despite this clear nexus between think tanks and American officials, think tanks have never actually been required to disclose sources of foreign funding. And given that so many of them are so intimately tied with America’s foreign policy-making apparatus, U.S. officials not only rely on think tanks’ recommendations, but they routinely cycle in and out of these think tanks themselves. They’ve become go-to vehicles for foreign financing and for foreign lobbying efforts that can operate without any transparency whatsoever.

As researchers have discovered, the amount of foreign funding sprinting toward American think tanks, especially from foreign dictatorships, has positively exploded over the past few years, with America’s most prominent think tanks taking in tens of millions of dollars, and potentially more, from foreign regimes in recent years.²¹ And the UAE has helped lead the charge. As detailed below, the UAE has given tens of millions of dollars directly to America’s most prominent think tanks – all without being required to disclose any of this funding to American regulators, to the American populace, or to the American legislators who these think tanks influence.

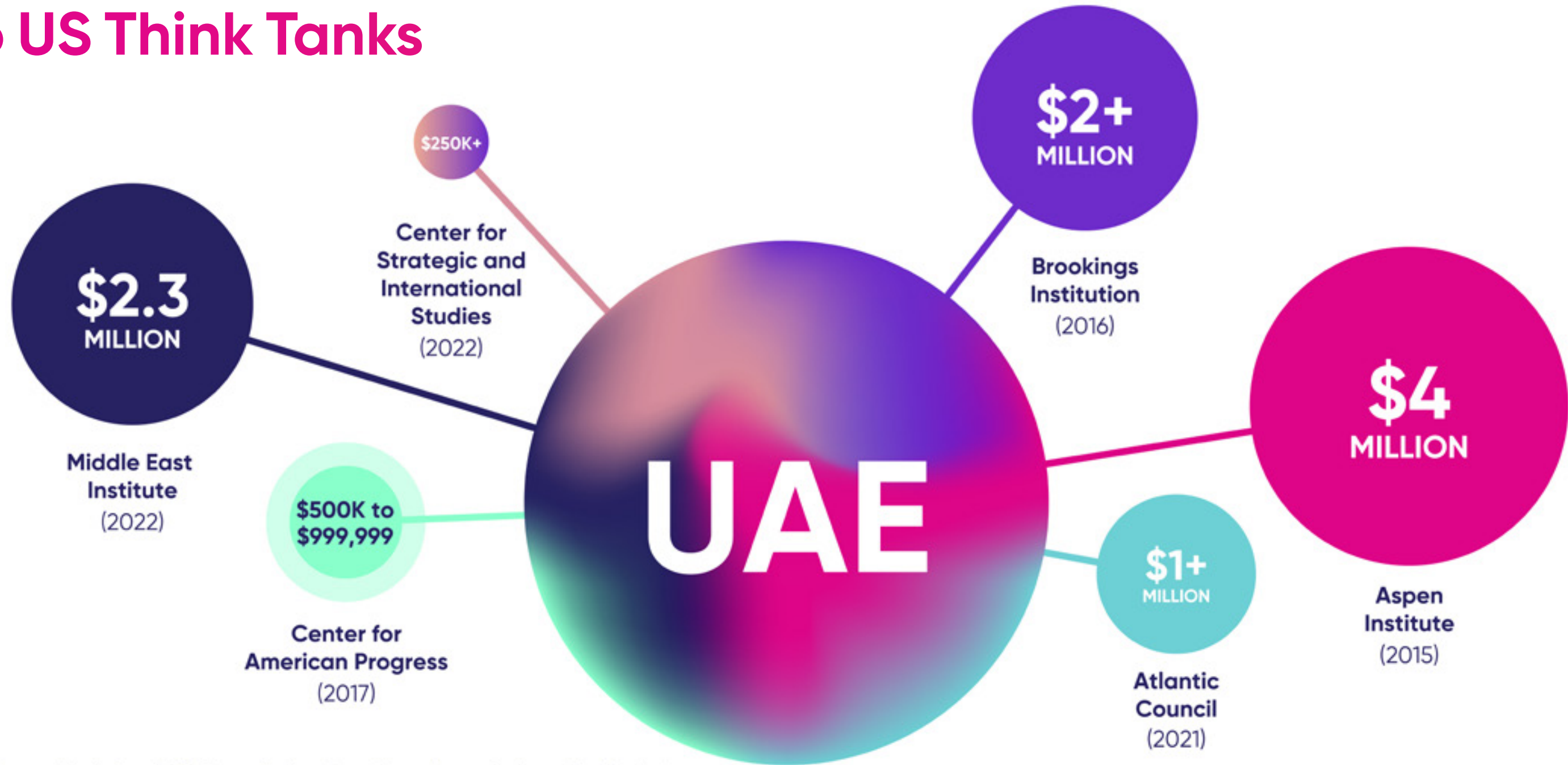
With these donations, the Emirati regime became one of the largest foreign benefactors for a number of major American think tanks.

For instance, the UAE provided millions of dollars to think tanks like the Aspen Institute, which is a group that claims to be “committed to realizing a free, just, and

Foreign dictatorships have flooded America’s leading think tanks and universities with enormous sums of money – and proceeded to launder their reputations, and open untold doors, in the process.

²¹ Eric Lipton, Brooke Williams, and Nicholas Confessore, “Foreign Powers Buy Influence at Think Tanks,” The New York Times, September 7, 2014, <https://www.nytimes.com/2014/09/07/us/politics/foreign-powers-buy-influence-at-think-tanks.html>

Notable UAE Donations to US Think Tanks



Sources: Atlantic Council, "2021 Honor roll of contributors," <https://www.atlanticcouncil.org/in-depth-research-reports/report/2021-annual-report-honor-roll-of-contributors/>; Middle East Institute, "2022 Contributors," <https://www.mei.edu/sites/default/files/2023-04/2022%20Contributors%20amended%204-18.pdf>; Aspen Institute, "2015 Transparency Report," <https://www.aspeninstitute.org/wp-content/uploads/2021/04/2015-transparency-report.pdf>; Center for American Progress, "Our Supporters 2017," <https://www.americanprogress.org/our-supporters-2017/>; Brookings Institution, "Brookings Institution's Contributors List," <https://www.brookings.edu/wp-content/uploads/2016/07/The-Brookings-Institutions-Contributors-List-Fiscal-Year-2016.pdf>; Center for Strategic and International Studies, "U.S. and Allied/Partner Government," <https://www.csis.org/about/financial-information/donors/us-and-alliedpartner-government>



Over and again, American think tanks have accepted Emirati funding, and then proceeded to obscure their relationship with the dictatorship.

“commitment to fundamental... values” include “democracy” and “individual rights” – neither of which the UAE maintains – the Atlantic Council has nonetheless accepted millions from the dictatorship, rivaling donations from democracies like the UK.²³ The Atlantic Council does not reveal the total amount it accepts from the UAE, but the funds are apparently sufficient to land in the Atlantic Council’s highest ranks of donors – the only dictatorship to do so.²⁴

And that money apparently came with strings attached. As one examination of foreign funding of U.S. think tanks found, the “Atlantic Council’s ties to the UAE have given the UAE the opportunity to shape the think tank’s reports prior to publication” – effectively allowing the dictatorship to craft the Atlantic Council’s supposedly independent analysis before publishing.²⁵ As leaked emails showed, Atlantic Council officials directly reached out to their UAE patrons with offers to edit their text, including material “that was to be published under the name of” David Petraeus, one

equitable society.”²² Most impressively, the UAE is also one of the largest foreign donors to places like the Atlantic Council, which remains arguably America’s most prominent think tank focused on foreign policy. Despite claiming that its

of America’s most well-known former military officers.²⁶

Nor is that all. In early 2023, CNBC published an op-ed from Atlantic Council President Frederick Kempe, praising the UAE’s selection as the host for the United Nations’ recent Climate Change Conference (known as COP28). As Kempe wrote, the appointment of Sultan Al Jaber, the CEO of the UAE’s Abu Dhabi National Oil Company, was “the ideal choice.” However, Kempe failed to add any disclosures about the UAE’s relationship with the Atlantic Council – a blinding oversight, considering the substantial sums the Atlantic Council has accepted from the dictatorship. CNBC soon issued an editor’s note on Kempe’s article, describing the relationship between the UAE and Atlantic Council as an “obvious conflict of interest,” which Kempe never bothered to disclose to CNBC before publication.²⁷

To be fair to the Atlantic Council, other think tanks happily gorged on UAE financing as well. By the late 2010s, the Emirati dictatorship had become one of the top donors for the Center for American Progress – a nominally liberal think tank, linked closely with the Democratic Party. Following the UAE’s funding, a member of the think tank’s staff began helping Emirati officials “organize UAE-sponsored trips” to the country, and began directly advising Emirati officials on how to lobby their American counterparts.²⁸

Meanwhile, the Washington-based Middle East Institute remains largely reliant on funding from the UAE; according to its most recent disclosures, the UAE remains far and away the think tank’s largest donor.²⁹ The relationship culminated in a “secret \$20 million gift” that the UAE provided for the Middle East Institute, which the

²² Aspen Institute, “2015 Transparency Report,” <https://www.aspeninstitute.org/wp-content/uploads/2021/04/2015-transparency-report.pdf>; “Our Purpose,” The Aspen Institute, 2023, <https://www.aspeninstitute.org/what-we-do/>

²³ “About the Atlantic Council,” The Atlantic Council, 2023, <https://www.youtube.com/watch?v=rqoKd-CogeHE&t=8s>; “Honor Roll of Contributors,” The Atlantic Council, 2023, <https://www.atlanticcouncil.org/about/donate/honor-roll-of-contributors-2019/>

²⁴ “Honor Roll of Contributors,” The Atlantic Council, 2023, <https://www.atlanticcouncil.org/about/donate/honor-roll-of-contributors-2019/>

²⁵ Ben Freeman, “Foreign Funding of Think Tanks in America,” Center for International Policy, https://static.wixstatic.com/ugd/3ba8a1_4f06e99f35d4485b801f8dbfe33b6a3f.pdf

²⁶ *Ibid.*

²⁷ Frederick Kempe, “Op-Ed: Making the Case for Oil CEO Sultan Al Jaber to Lead the UN Climate Conference This Year,” CNBC, May 22, 2023, <https://www.cnbc.com/2023/01/14/climate-change-oil-ceo-sultan-al-jaber-is-ideal-person-to-lead-cop-28.html>

²⁸ Center for American Progress, “Our Supporters 2017,” <https://www.americanprogress.org/our-supporters-2017/>; Clio Chang and Ryan Grim, “Amid Internal Investigation Over Leaks to Media, the Center for American Progress Fires Two Staffers,” The Intercept, January 16, 2019, <https://theintercept.com/2019/01/16/center-for-american-progress-cap-uae-leak/>

²⁹ Indeed, the UAE is the only donor to the Middle East Institute that has given over \$1,000,000 in recent years, which it has done for multiple years in a row. For the most recent donor breakdown at the Middle East Institute, see 2021 Contributors - Middle East Institute, Middle East Institute, https://www.mei.edu/sites/default/files/2022-02/2021%20Contributions_Amount%20Disclosure.pdf

institute did not disclose.³⁰

While no contracts stipulating clear *quid pro quo* have emerged regarding these donations, it's not difficult to see what the UAE may have wanted from such donations. For instance, the Middle East Institute became an outspoken voice criticizing groups like the Muslim Brotherhood, which has been critical of the Emirati regime in the past. The organization has claimed that the Muslim Brotherhood's aims "resemble al-Qaeda's goals,"³¹ all while praising the UAE's "innovative tactics and efforts to highlight its religious tolerance."³²

Over and over again, American think tanks have accepted Emirati funding, and then helped obscure their relationship with the dictatorship. The only reason we know of these donations and of the effects these donations had on the think tanks in question is due to the remarkable work of investigative journalists and researchers, who spent untold hours trying to pry information from these opaque think tanks. And again, this is just what's managed to come out thus far. Because there are no federal requirements for transparency as it pertains to foreign funding for American think tanks, the organizations – and what dictatorships like the UAE receive in return for these donations – remain a black box.

Corrupting higher education

Like think tanks, American universities have seen an explosion of foreign gifts, especially from foreign dictatorships and related proxies. However, it is only in recent years that the topic has come to the fore, following high-profile congressional investigations.³³ While much of the attention has understandably focused on

Chinese funding, the UAE has pursued a similar means of large-scale donations to a broad array of American universities – all the better to spin its own image as a benign, generous government interested in educational pursuits.

Thankfully, and similar to foreign lobbyists, the U.S. has created a new database to detail some of these donations. In 2020, the U.S. Department of Education introduced a new, publicly accessible database detailing significant donations from foreign sources to American universities. While the details in the new database remain sparse – it provides only the dates and recipients of the gifts, as well as the total amounts and the country source – it is still an unprecedented look into how foreign dictatorships have spent years bankrolling America's leading colleges and universities, the impact of which has barely been investigated elsewhere. (In reality, the federal government has published two separate databases, which remain disjointed and in need of further organization; see "Recommendations" below.)³⁴

And as the disclosures illustrate, the UAE has helped lead the charge of foreign dictatorships becoming major funders of American universities. Per the new disclosures, the UAE's single largest donation went to the University of Texas's MD Anderson Cancer Center, with the dictatorship sending \$75 million to the center. But that's not all. Other destinations for Emirati funds include Johns Hopkins University, which has accepted approximately \$33 million from sources in the United Arab Emirates. Other leading American universities, such as NYU (at least \$51 million), Boston University (at least \$35 million), Harvard University (at least \$49 million), and MIT (at least \$37 million), have taken in millions more from entities in the UAE. A wide array of other universities, from Arizona State University to the University of Chicago, have also taken in significant sums from these Emirati sources.³⁵

³⁰ Ryan Grim, "Gulf Government Gave Secret \$20 Million Gift to DC Think Tank," The Intercept, October 26, 2018, <https://theintercept.com/2017/08/09/gulf-government-gave-secret-20-million-gift-to-d-c-think-tank/>. The gift did not come directly from the UAE government, but through an Abu Dhabi think tank.

³¹ Michael Ryan, "The Muslim Brotherhood and Transition in Egypt," Middle East Institute, February 8, 2023, <https://www.mei.edu/publications/muslim-brotherhood-and-transition-egypt>

³² Birol Baskan, "The Pope, the UAE, and the Muslim Brotherhood," Middle East Institute, February 13, 2023, <https://www.mei.edu/publications/pope-uae-and-muslim-brotherhood>

³³ Rob Portman and Tom Carper, "Majority and Minority Staff Report - China's Impact on the U.S. Education System," Committee on Homeland Security & Governmental Affairs, June 15, 2023, https://www.hsgac.senate.gov/subcommittees/investigations/library/files/majority-and-minority-staff-report_-_chinas-impact-on-the-us-education-system/

³⁴ For the full database, see: "College Foreign Gift and Contract Report," U.S. Department of Education, <https://sites.ed.gov/foreigngifts/>. An additional database can be found at: <https://studentaid.gov/data-center/school/foreign-gifts>.

³⁵ "College Foreign Gift and Contract Report," U.S. Department of Education, <https://sites.ed.gov/foreigngifts/>. Some of this data is available only via the "Current and Archival Copies of All Public Section 117 Records" links at the bottom of the Department of Education's page. These numbers are the total funds cited as "gifts" and/or "restricted gifts" to these universities. Similar to think tank funding, not all of these donations came directly via governmental sources.

Notable UAE Donations to US Universities



Source: "College Foreign Gift and Contract Report," U.S. Department of Education, <https://sites.ed.gov/foreigngifts/>.
Some of this data is available only via the "Current and Archival Copies of All Public Section 117 Records" links at the bottom of the Department of Education's page. These numbers represent total gifts and/or restricted gifts identified in the U.S. Department of Education's Section 117 database.

Barring broader investigations, it's ultimately unclear what these donations were used for, or any further stipulations or restrictions that came with many of these donations. Unlike FARA, the Department of Education database unfortunately doesn't contain details of these contracts or agreements.³⁶

However, as researchers have begun discovering, there's one clear thrust for university-level donations from foreign dictatorships. Not only do they provide the opportunity for regimes like the UAE to launder their image – transforming from a repressive regime dedicated to torturing opponents and silencing criticism into a philanthropic regime dedicated to higher education – but they open further doors to both students and academics cycling through these universities.³⁷ That is, such donations offer access to former policymakers who've since moved into academia, as well as future policymakers moving through their education. Likewise, as seen with other dictatorships donating to American universities, these gifts provide opportunities to silence and stifle criticism of their regimes.³⁸

There is, in reality, almost no downside to these donations. Instead, American universities have proven themselves more than willing, time and again, to accept staggering sums from brutal regimes like the UAE, regardless of the consequences – and regardless of what it may mean for democratic activists opposed to the Emirati dictatorship.

³⁶ It's also unclear if the donations were provided on the date given in the new Department of Education database – which began in 2020, and continued through the middle of 2022 – or if that's only the date they were disclosed to American authorities. As the database says, "The [database] reflects foreign gifts and contracts that institutions of higher education reported to the Department through the updated reporting portal, which became available for data entry on June 22, 2020. It therefore displays all foreign gifts and contracts reported between June 22, 2020, and October 17, 2022, no matter when the underlying transaction took place." See: <https://sites.ed.gov/foreigngifts/>

³⁷ Alexander Cooley, Tena Prelec, John Heathershaw, and Tom Mayne, "Reputation Laundering in the University Sector of Open Societies: An International Forum Working Paper," National Endowment For Democracy, May 25, 2021, <https://www.ned.org/reputation-laundering-in-the-university-sector-of-open-societies-working-paper/>

³⁸ "China's Impact on the U.S. Education System," U.S. Senate Permanent Subcommittee on Investigations, 2019, <https://www.hsgac.senate.gov/subcommittees/investigations/library/files/majority-and-minority-staff-report-chinas-impact-on-the-us-education-system/>

Threatening academic freedom

One of the clearest case studies in how financial links between the UAE and an American university can erode things like academic freedom and basic freedom of speech can be found with NYU. In 2010, the university opened up a satellite campus in Abu Dhabi, claiming the it would be a center of "excellence, innovation, and success."³⁹ Unfortunately, the only areas of innovation and success the campus presented appear to lie with how the UAE then silenced critics – and undercut NYU's professed principles of academic freedom.

As one write-up later detailed, NYU's UAE campus was soon "mired in controversy." Initially, that controversy centered on the fact that the migrant workers constructing the campus "were victims of wage theft, excessive work hours and other forms of labor abuse – all while being housed in 'isolated, squalid encampments.' When the workers decided to strike against these conditions, they were brutally suppressed by police."⁴⁰

Soon thereafter, the dictatorship began censoring books and barring NYU professors outright. In 2016, NYU professor Andrew Ross – who focused his work on labor rights and labor crimes, including in the UAE – was banned from the country for supposed "security reasons."⁴¹ NYU's leadership responded with little more than silence, preferring to maintain its partnership in the UAE.

Nor was that all. Another professor, Lauren Minsky, said that her books had been seized by UAE officials when entering the country, and that "the director of [the Abu Dhabi campus] bookstore told her the books were censored." "This was not surveillance but harassment and they're sending a clear message to stop," Minsky said.

³⁹ "NYU Abu Dhabi Celebrates 10 Years," New York University Abu Dhabi, 2021, <https://nyuad.nyu.edu/en/10-year-anniversary.html>

⁴⁰ WSN Editorial Board, "Confronting The Contradiction of NYU Abu Dhabi," Washington Square News, New York University, February 18, 2020, <https://nyunews.com/opinion/2020/02/18/nyu-abu-dhabi-academic-freedom/>

⁴¹ Zach Banks, "Opinion: NYU Must Take a Stand for Academic Freedom Abroad," Washington Square News, New York University, February 14, 2022, <https://nyunews.com/opinion/2022/02/14/nyu-abroad-campuses-no-academic-freedom/>

"I was left wondering for the rest of my time in Abu Dhabi, 'stop what?' I was almost paralyzed with disbelief by this whole incident and it made me withdraw a lot from campus life."⁴²

As with Ross, NYU's leadership appeared uninterested in Minsky's experience – or how clearly it threatened academic freedom at the university. "I cannot emphasize this strongly enough but it was almost like nothing ever happened," Minsky later said. "Instead, there were various actions taken by the administration in wake of my reporting that basically made it impossible for my family to continue to work in the UAE."⁴³

Again and again, Emirati officials targeted NYU academics, especially those critical of the regime. Again and again, NYU's administration did nothing. "When given an inch, the UAE took a mile," one journalist said.⁴⁴

⁴² Meghna Maharishi, "Faculty Discuss NYU's Ties to Abu Dhabi," NYU News, December 3, 2018, <https://nyunews.com/2018/12/03/faculty-forum-uae-academic-freedom/>

⁴³ *Ibid.*

⁴⁴ Banks, "Opinion: NYU Must Take a Stand for Academic Freedom Abroad," February 14, 2020, <https://nyunews.com/opinion/2022/02/14/nyu-abroad-campuses-no-academic-freedom/>

3 | FORMER MILITARY OFFICIALS



In 2020, the U.S. Department of Defense published a remarkable report on the funding of paramilitary groups operating in Libya. As the Pentagon described, the Wagner Group – the Russian private military company responsible for, among other things, horrific abuses on behalf of the Kremlin in Ukraine – wasn't receiving funds only from Moscow. Instead, the UAE was "apparently helping to finance" the mercenaries, who act as effective Kremlin proxies in Russia's neo-imperial projects in places like Sudan and the Central African Republic.⁴⁵ The UAE issued swift denials, but later investigations determined that the Wagner Group and its allies "form the backbone of a sprawling military supply and logistics chain that spans from central Russia to the General Headquarters of the Armed Forces in Abu Dhabi in the UAE."⁴⁶

The revelations about the UAE's links with Russian mercenaries, and the Kremlin more broadly, surprised many. But it mirrored a similar development elsewhere, which saw the UAE transform into the primary hub for sanctioned Russian oligarchs and officials to not only dodge Western sanctions, but to continue expanding Russia's kleptocratic influence wholesale. While the UAE has long served as a welcome home for illicit wealth – not least as the home for corrupt Afghan officials, who used Dubai as an effective dirty money laundromat while gutting Kabul's finances before the Taliban takeover⁴⁷ – it is in the last few years that the country has blossomed into the go-to destination for sanctioned figures looking for financial reprieve. As one investigation from anti-corruption researchers found, "part of what underpins Dubai's prosperity is a steady stream of illicit proceeds borne from corruption and crime."⁴⁸

⁴⁵ Amy Mackinnon and Jack Detsch, "Pentagon Says UAE Possibly Funding Russia's Shadowy Mercenaries in Libya," *Foreign Policy*, November 30, 2020, <https://foreignpolicy.com/2020/11/30/pentagon-trump-russia-libya-uae/>

⁴⁶ Candace Rondeaux, Oliver Imhof, and Jack Margolin, "The Abu Dhabi Express: Analyzing the Wagner Group's Libya Logistics Pipeline & Operations," *New America*, 2021, <https://www.newamerica.org/future-frontlines/reports/the-abu-dhabi-express/a-net-assessment-of-wagner-groups-networked-effects-in-libya/>

⁴⁷ Jon Boone, "The Financial Scandal That Broke Afghanistan's Kabul Bank," *The Guardian*, June 16, 2011, <https://www.theguardian.com/world/2011/jun/16/kabul-bank-afghanistan-financial-scandal>

⁴⁸ Matthew T Page and Jodi Vittori, "Dubai's Role in Facilitating Corruption and Global Illicit Financial

And following Russia's full-scale invasion of Ukraine, that transformation only accelerated. As the *New York Times* reported in 2022, dozens of Russian businessmen or officials linked to Putin have poured significant sums into the UAE. These figures include those already sanctioned by the U.S. or the EU following Russia's invasion of Ukraine – sanctions that the UAE has not yet implemented. *Deutsche Welle* also reported on Russian oligarchs' private jets touching down in Dubai, with several superyachts also now moored there.⁴⁹

However, that transformation into a sieve for illicit Russian wealth – and into a haven for Russians looking to continue bankrolling the atrocities in Ukraine – has barely seen any criticism from the West. The reality that the UAE is now one of the world's greatest offshore and illicit finance havens has hardly broken into the mainstream. And the fact that the UAE has provided a safety valve for any range of anti-American and anti-Western actors is something that Western officials appear little interested in addressing.

Part of that has to do with American and Western priorities elsewhere, with Western governments still viewing the UAE as a supposed partner in the region. But part of

Flows," *Carnegie Endowment*, 2020, <https://carnegieendowment.org/2020/07/07/dubai-s-role-in-facilitating-corruption-and-global-illicit-financial-flows-pub-82180>

⁴⁹ David D Kirkpatrick, Mona El-Naggar, and Michael Forsythe, "How a Playground for the Rich Could Undermine Sanctions on Oligarchs," *The New York Times*, March 9, 2022, <https://www.nytimes.com/2022/03/09/us/russian-oligarchs-sanctions-dubai.html>; Cathrin Schaer, "Why are rich Russians going to the UAE?", March 12, 2022, <https://www.dw.com/en/why-is-uae-a-hot-spot-for-russians-dodging-sanctions/a-61099194>

It points directly to where the regime has proven the most innovative: hiring former American military officials to act not only as advisors, but also as effective lobbyists, available to blunt any criticism of the Emirati government's support for regimes like the Kremlin.

The hottest overseas job market for retired U.S. service members is a tiny Persian Gulf nation that outsources much of its military to foreign advisers and mercenaries. Over the past seven years, 280 military retirees have sought federal authorization to work for the United Arab Emirates – far more than for any other country.

that also stems from the final prong of the Emirati regime’s political influence campaign – and points directly to where the regime has proven the most innovative: hiring former American military officials to act not only as advisors, but also as effective lobbyists, available to blunt any criticism of the Emirati government’s support for regimes like the Kremlin.

Much of the reporting on this phenomenon has come only in recent months, and remains awash in confusion and questions. Unlike lobbyists or universities, there is no database of former American military officials, including those of the highest ranks, now working on behalf of the UAE. Investigative journalists, however, have begun piecing together a picture of the topic – and uncovering details of how the UAE has effectively turned American military officials into pawns of the regime.

“The hottest overseas job market for retired U.S. service members is a tiny Persian Gulf nation that outsources much of its military to foreign advisers and mercenaries,” the Washington Post recently wrote. “Over the past seven years, 280 military retirees have sought federal authorization to work for the United Arab Emirates – far more than for any other country[.]”⁵⁰ Indeed, nearly every application to work with the UAE was approved, with less than 1 percent of the applications denied.⁵¹

⁵⁰ Nate Jones and Craig Whitlock, “UAE Relied on Expertise of Retired US Troops to Beef up Its Military,” The Washington Post, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/uae-military-us-veterans/>

⁵¹ Ben Freeman and Kelley Beaucar Vlahos, “DOD: Retired US Officers Marching into Work for Foreign Gov-

Leaders and loyalty

One of the problems in assessing just how deep – and just how effective – the Emirati recruitment of former U.S. military officials has gone is the lack of transparency. Part of this stems from the finances involved; for the clear majority of the waivers uncovered, total payment remains unclear.⁵² So, too, are almost all of the American military officers who’ve signed up with the regime. As the Project on Government Oversight found, over 98 percent of former military personnel now in the pay of the UAE had their names redacted.⁵³

However, the names uncovered thus far point to just how successful the UAE has been in recruiting America’s leading military officials. These officials include generals like Jim Mattis, the former U.S. Defense Secretary, who continually stumped for Emirati interests while working as “military advisor” for the regime. Mattis “extolled” the UAE’s leadership and “downplayed concerns about human rights in the UAE and other countries in the region,” arguing against those who wanted to improve the human rights focus in the region. Others at lower ranks followed Mattis’s precedent. Numerous generals and colonels have likewise agreed to work as “military consultants” for the Emirati regime.⁵⁴

Unfortunately, thanks to the lack of any kind of disclosure requirements, the entire range of services these former American military officials have provided for the UAE remains unclear. But taken together, the contracts represent an unprecedented phenomenon of a foreign regime – and especially a foreign dictatorship – hiring myriad former American officials to serve its own interests. It is, in many ways, the

ernments,” Responsible Statecraft, April 27, 2023, <https://responsiblestatecraft.org/2023/04/26/dod-retired-us-officers-marching-into-work-for-foreign-governments/>

⁵² *Ibid.*

⁵³ Julienne McClure, “State Dept. Is Quietly Approving Former Servicemembers’ Work for Foreign Interests. That’s a Problem.,” Project On Government Oversight, 2022, <https://www.pogo.org/investigation/2022/10/state-dept-is-quietly-approving-former-servicemembers-work-for-foreign-interests-thats-a-problem>

⁵⁴ Nate Jones and Craig Whitlock, “UAE Relied on Expertise of Retired US Troops to Beef up Its Military,” The Washington Post, October 18, 2022, <https://www.washingtonpost.com/investigations/interactive/2022/uae-military-us-veterans/>

key prong of the Emirati regime's efforts that deserves far more scrutiny, and far more concern.

After all, Mattis's tenure as a "military advisor" to the Emiratis *preceded* his appointment as U.S. Defense Secretary. And it was a relationship Mattis never disclosed to the American public, and that allowed the UAE to have a close ally in the highest ranks of the American government – without the American populace ever being aware.⁵⁵

Hacking Americans

Nor was it just former generals who began aiding the Emirati regime. As investigations and indictments would later make clear, the UAE specifically looked to American officials with cyber-security experience to hack and monitor regime targets. A handful of former American officials provided "sophisticated computer hacking technology" to the UAE, allowing the regime to "break into computers in the United States and elsewhere in the world."⁵⁶

The regime recruited Americans to aid with something called "Project Raven," which "hacked into the accounts of human rights activists, journalists and rival governments," as Reuters reported.⁵⁷ This UAE unit utilized sophisticated hacking technology, including "zero-click" systems which could "compromise a device without any action by the user."⁵⁸ That is, these UAE-funded hackers could "hack into Apple iPhones without requiring a target to click on malicious links."⁵⁹

⁵⁵ Jeremy Herb, "First on CNN: Mattis Advised UAE Military Before Joining Trump Administration," CNN, August 2, 2017, <https://www.cnn.com/2017/08/02/politics/mattis-advised-uae-military/index.html>

⁵⁶ Eric Tucker and Alan Suderman, "3 Former US Officials Charged in UAE Hacking Scheme," AP News, September 15, 2021, <https://apnews.com/article/technology-united-states-hacking-5700a1fa8b1b-4612477658b883e58f31>

⁵⁷ Joel Schectman and Christopher Bing, "Ex-US Intel Operatives Admit Hacking American Networks for UAE," Reuters, September 15, 2021, <https://www.reuters.com/world/us/american-hacker-mercenaries-face-us-charges-work-uae-2021-09-14/>

⁵⁸ "Three Ex-US Intelligence Officers Admit Hacking for UAE," BBC News, September 15, 2021, <https://www.bbc.com/news/world-middle-east-58558690>

⁵⁹ Joel Schectman and Christopher Bing, "Ex-US Intel Operatives Admit Hacking American Networks for UAE," Reuters, September 15, 2021, [https://www.reuters.com/world/us/american-hacker-mercenaries-](https://www.reuters.com/world/us/american-hacker-mercenaries-face-us-charges-work-uae-2021-09-14/)

And this didn't include just Emirati citizens and activists. As one former employee of the UAE's "Project Raven" detailed, their work not only targeted British journalists critical of the regime, but even targeted a range of Americans. UAE security forces "had sought surveillance against... Americans," the former analyst said. "When [the analyst] questioned the apparent targeting of Americans, she received a rebuke from an Emirati colleague for accessing the targeting list." Indeed, the Emiratis reportedly created a separate category for Americans entirely, and included at least one American journalist on the list of targets.⁶⁰

[face-us-charges-work-uae-2021-09-14/](https://www.reuters.com/world/us/american-hacker-mercenaries-face-us-charges-work-uae-2021-09-14/)

⁶⁰ Christopher Bing and Joel Schectman, "Exclusive: Ex-NSA Cyberspies Reveal How They Helped Hack Foes of UAE," Reuters, 2019, <https://www.reuters.com/investigates/special-report/usa-spying-raven>

CONCLUSION

In October 2022, the Washington Post detailed a remarkable intelligence report into how the UAE had successfully launched a political infiltration operation across the American socio-political spectrum. While the report remains classified, it reportedly highlighted just how successfully the UAE had managed to manipulate American policy, and whitewash its own crimes in the process. As the Washington Post reported, the report – compiled by the U.S.’s National Intelligence Council – detailed the UAE’s efforts, which involved “multiple U.S. administrations” and was dedicated to “exploit[ing] the vulnerabilities in American governance.”⁶¹

Such intelligence reports are routinely issued for American adversaries. However, the report was “remarkable in that it focuses on the influence operations of a friendly nation rather than an adversarial power such as Russia, China or Iran,” the Washington Post added. “It is also uncommon for a U.S. intelligence product to closely examine interactions involving U.S. officials given its mandate to focus on foreign threats.”⁶² The report was also authored prior to the recent leaks of internal U.S. intelligence communiqués, which revealed not only that Russian intelligence officers claimed they’d convinced the UAE to “work together against US and UK intelligence agencies,”⁶³ but that construction at a suspected Chinese military site in the UAE has continued, despite Emirati claims otherwise.⁶⁴

⁶¹ John Hudson, Ellen Nakashima, and Liz Sly, “Buildup Resumed at Suspected Chinese Military Site in UAE, Leak Says,” The Washington Post, April 27, 2023, <https://www.washingtonpost.com/national-security/2022/11/12/uae-meddled-us-politics-intel-report/>

⁶² *Ibid.*

⁶³ Ellen Knickmeyer, Jon Gambrell, and Nomaan Merchant, “Leaked US Intel: Russia Operatives Claimed New Ties with UAE,” AP News, September 21, 2023, <https://apnews.com/article/intelligence-leak-russia-uae-pentagon-9941a3bb88b48d4dbb5218649ea67325>

⁶⁴ John Hudson, “US Intelligence Report Says Key Gulf Ally Meddled in American Politics,” The Washington Post, November 12, 2022, <https://www.washingtonpost.com/national-security/2023/04/26/chinese-military-base-uae/>

Still, given the breadth of the Emirati regime’s campaigns in the U.S., it should perhaps be unsurprising that the UAE was the subject of such a report. Given the multi-faceted elements of the UAE’s campaign – from lobbyists to think tank funding, from illicit influence campaigns to wide-scale non-profit donations, and now to bankrolling a wide array of American military leaders – the UAE’s efforts appear broader than any other foreign dictatorship. And given how the regime has remained in America’s good graces, even after the reported funding of Russian mercenary groups in places like Libya and the UAE’s transformation into a center of illicit finance and sanctions evasion, the UAE’s political infiltration and influence efforts have arguably been more successful than anything in recent memory – and perhaps even in American history.

Moreover, this infiltration and influence effort hasn’t been overseen by a democratic ally, dedicated to broadly similar foreign policy goals as the U.S. It has, instead, been directed by a dictatorship cozy with America’s leading adversaries. Time and again, the UAE has pursued divergent foreign policy priorities. From acting as a laundromat for illicit Russian wealth to reportedly bankrolling pro-Kremlin mercenaries to opening new areas of influence and military projection for Beijing, the UAE has consistently worked against American interests.

The Emirati dictatorship is, in other words, hardly a trusted partner. And as the author of arguably the greatest influence and infiltration effort in modern American history – and as a pioneer for other dictatorships to follow – it is a malign force dedicated to upending American politics and American policy, all while furthering the efforts of places like Moscow and Beijing.

The UAE may not be an American adversary – yet. But it is clearly content to work hand-in-glove with American adversaries elsewhere – and to influence American policy-making to its own ends, without any of us being aware.

NEXT STEPS

The UAE's campaigns have highlighted the paucity of regulations and oversight, as well as potential solutions, across the political and legislative spectrum in the U.S. Time and again, the UAE and its agents barreled through loopholes and openings to tilt American and Western policy to its advantage – mechanisms that, if left unchecked, other dictatorships and anti-Western regimes will gladly mirror. There are a range of moves and policy prescriptions the U.S. (and other democracies) can and should pursue in order to prevent the UAE from continuing its infiltration and influence networks, and to prevent autocracies and adversaries elsewhere from doing the same.

1

Strengthen foreign lobbying regulations, transparency, and prosecutions. For years, the U.S. effectively failed to enforce the Foreign Agents Registration Act (FARA), allowing any number of regimes to freely lobby on their behalf without American policymakers or the American public being aware. In recent years, the Department of Justice has refocused on FARA-related prosecution – but such a move hasn't gone nearly far enough. Those responsible for overseeing and implementing FARA should receive significant increases in funding and personnel, and should be able to issue civil injunctions in order to force lobbyists to register to work. Failing that, legislators should consider following the recent pledge from President Joe Biden and outlaw foreign lobbying outright.⁶⁵

⁶⁵ Casey Michel, "Beware, Lobbyists: The Future of FARA under a Biden Presidency," Just Security, February 2, 2022, <https://www.justsecurity.org/69341/beware-lobbyists-the-future-of-fara-under-a-biden-presidency/>

2

Require far greater transparency among think tanks accepting funds from foreign sources, and especially from foreign dictatorships. For years, think tanks have effectively skirted transparency requirements for other American entities. However, their defenses – and their claims that they don't engage in any activity that requires transparency – are specious. In the think tank sector, the U.S. should pass either legislation or regulations requiring think tanks to disclose donations received from foreign governments and related entities, and create a publicly accessible database to track and trace this funding.⁶⁶

3

Require and enforce far greater transparency requirements among American universities. Like think tanks, universities have spent years dodging transparency requirements and cycling millions in funds linked directly to foreign dictatorships like the UAE, transforming into go-to vehicles for laundering the regimes' images – and also accessing scholars, policymakers, and students. The U.S. should strengthen enforcement surrounding transparency in the university sector, expanding its recent database of foreign government donations to include contract details, as well as meetings with governmental representatives and foreign officials.

⁶⁶ "Golden, Bipartisan Colleagues Introduce Legislation to Combat Foreign Influence in Washington," Representative Jared Golden, June 27, 2022, <https://golden.house.gov/media/press-releases/golden-bipartisan-colleagues-introduce-legislation-to-combat-foreign-influence-in-washington#:~:text=WASHINGTON%20%E2%80%94%20Today%2C%20U.S.%20Representatives%20Jared,government%20officials%2C%20and%20think%20tanks>. For proposed regulations, see: <https://www.politico.com/news/2020/10/13/trump-think-tanks-foreign-funding-429209>

4

Prevent former U.S. military officials from working on behalf of dictatorships. Given the deep pockets of myriad dictatorships around the world, it's not difficult to envision a world in which kleptocratic regimes compete for the advice and aid of former American military officials. Indeed, given the lack of reporting around the topic, such a world may already exist. However, there is no reason that former U.S. military officers should be allowed to provide their expertise, or their ability to lobby, to dictatorial regimes. The U.S. should pass legislation or regulations ending the practice.

5

The U.S. must consider employing targeted sanctions against Emirati officials credibly accused of corruption and/or human rights abuses, targeting those responsible for, among other things, torture linked to the UAE regime, as well as the UAE's role in sanctions evasion.

6

Publish the recent intelligence report on the UAE's political interference and influence campaign. The U.S. should publish the recent intelligence report detailing the UAE's myriad political influence and infiltration efforts, so that Americans and others in democratic polities can examine the reports in further detail⁶⁷ – and potentially launch their own investigations into related UAE efforts. The U.S. should also host high-level congressional hearings on the topic.

⁶⁷ Nicola Giovannini, "DAD Releases Extensive New Report on Scale of UAE Lobbying & Influence Network in EU," Droit au Droit, 2022, <https://www.dadinternational.org/news/77-dad-releases-extensive-new-report-on-scale-of-uae-lobbying-influence-network-in-eu>

