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Rabbi Jerome Unger,
Zionist Organization of America,
41 East 42nd Street,
New York 17, New York.

Dear Rabbi Unger:

I have your letter of June 2, 1948, enclosing a copy of a letter directed to the Foreign Agents Registration Section relative to the obligations of the Zionist Organization of America to register under the terms of the Foreign Agents Registration Act.

Upon examination of all the facts relating to the activities of the Zionist Organization of America, for and on behalf of the World Zionist Organization, I find that the conclusion is inescapable that your organization is obliged to register under the terms of the aforementioned Act. As you know, the definition of the term "agent" in the Act is much broader than the common law meaning of that term. The agency relationship may arise from a course of activity in the United States regardless of any formal contractual or constitutional provisions. The activities of the Zionist Organization of America, while undoubtedly in furtherance of the interests of the Jews in Palestine, are specifically in support of the program of the World Zionist Organization and, regardless of any formal agreement or control, the activity of your organization constitutes it an agent of the World Zionist Organization within the meaning of the Foreign Agents Registration Act.

It would be a source of deep regret to me if the Foreign Agents Registration Act should cause you to alter such a venerable and respected institution as your Constitution,

cc: Miss Healy
Mr. Peyton Ford
Mr. Quinn
Mr. Lawlin

FARS Docket
Records ✓
Internal Security
Chrono.

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especially, in view of the fact that any formal constitutional changes probably would not eliminate the necessity for registration. I have reached this conclusion upon a careful review of all of the facts available to this Department following my conversations with representatives of your organization. In the circumstances, I feel that your registration statement should be submitted without further delay.

Sincerely,

Attorney General