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Monday, March 04, 2013

Karen L. Haas, Clerk of the House of Representatives
Clerk of the House of Representatives
U.S. Capitol, Room H154
Washington, DC 20515#6601

Institute for Research: Middle Eastern Policy

RE: Zionist Organization of America, Registrant #344230000

Dear Karen L. Haas,

The above-reference registrant has failed to properly disclose its lobbying activities in mandatory filings to the Clerk. Section 5(b) of the Lobbying Disclosure Act requires specific information on the nature of lobbying activities. The Lobbying Activity Section of publicly disclosed Form LD-2 requires registrants to:

- Disclose the general lobbying issue area by code;
- Identify the specific issues on which the lobbyist(s) engaged in lobbying activities;
- Identify the Houses of Congress and Federal Agencies contacted;
- Disclose the lobbyists who had any activity in the general issue area;
- Describe the interest of a foreign entity if applicable;

Between 2006 and 2012 the ZOA averaged \$266,197 in lobbying expenditures per year, but only rarely disclosed their activities, and never disclosed ongoing lobbying for the Israeli government. A careful review of ZOA quarterly lobbying disclosures reveals that they have rarely complied with Section 5(b).

ZOA has a record of such non-compliance. A tax-exempt charity, it has lost its IRS tax-exempt status over failure to file for three consecutive years. It is also an organization with a troubled past. Between 1938 and 1960, the Zionist Organization of America was ordered to register as the U.S. foreign agent of the World Zionist Organization on seven occasions by the US Department of Justice and US State Department.¹ A careful analysis reviewed it is, by governing documents and observable action, a foreign agent as defined under the 1938 Foreign Agents Registration Act.

During the 1940's, ZOA Chairman Rudolph Sonneborn helped organize a vast clandestine conventional arms smuggling network that purchased War Assets Administration arms and explosives and other war materiel and shipped them to Israel in violation of Arms Export and Neutrality Acts. In the 1950s-1960s ZOA officials were instrumental in forming the Apollo Industries/NUMEC corporations which were investigated for diverting 339 kilograms of weapons-grade uranium to Israel. We urge you to investigate ZOA and obtain the required compliance with 5(b) in all past and any future filings.

Sincerely,

Grant F. Smith, Director of Research

Cc: Nanette M. Downing, Director of IRS EO Examinations; Attorney General Eric Holder

¹ <http://irmep.org/ILA/ZOA/DOJ-149-1603-ZOA/default.asp>