



Armenian National Committee of America
NATIONAL HEADQUARTERS

May 3, 2022

The Honorable Matthew G. Olsen
Assistant Attorney General for National Security
United States Department of Justice
FARA Unit
175 N Street, NE
Constitution Square, Building 3 - Room 1.204
Washington, DC 20002

Dear Assistant Attorney General Olsen:

We write to you today as citizens concerned that Dr. Memet Oz may be in violation of the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq* ("FARA"). According to Dr. Oz's Financial Disclosure Statement filed with the Secretary of the Senate, Turkish Airlines located in Istanbul, Turkey has an "[e]ndorsement agreement with Oz Media LLC under which the Filer [Dr. Mehmet Oz] provides consulting services, certain media and in-flight film appearances."¹

As you are well aware, FARA requires the registration of, and disclosures by, an "agent of a foreign principal" who, either directly or through another person, within the United States (1) engages in "political activities" on behalf of a foreign principal; (2) acts as a foreign principal's public relations counsel, publicity agent, information-service employee, or political consultant; (3) solicits, collects, disburses, or dispenses contributions, loans, money, or other things of value for or in the interest of a foreign principal; or (4) represents the interests of the foreign principal before any agency or official of the U.S. government. In addition, FARA requires agents to conspicuously label "informational materials" transmitted in the United States for or in the interest of a foreign principal.

¹ See <https://efdsearch.senate.gov/search/view/annual/e07e5827-852f-4e61-b1ad-aeb6536964b2/> (visited on May 2, 2022)

A “foreign principal” can be a foreign government, a foreign political party, any person outside the United States (except U.S. citizens who are domiciled within the United States), and any entity organized under the laws of a foreign country or having its principal place of business in a foreign country. Turkish Airlines is 49.13% owned by the Turkish Government.² FARA filings show that Turkish Airlines has been a foreign principal since at least 1975³ and as recently as 2015.⁴

An “agent of a foreign principal” is any person who acts as an agent, representative, employee, or servant, or otherwise acts at the order, request, or under the direction or control of a “foreign principal” and does any of the following:

- Engages within the United States in political activities, such as intending to influence any U.S. Government official or the American public regarding U.S. domestic or foreign policy or the political or public interests of a foreign government or foreign political party.
- Acts within the United States as a public relations counsel, publicity agent, information service employee, or political consultant.
- Solicits, collects, disburses, or dispenses contributions, loans, money, or other things of value within the United States.
- Represents within the United States the interests of a foreign principal before U.S. Government officials or agencies.⁵

Dr. Oz indisputably serves as public relations counsel, publicity agent, information service employee, or political consultant for Turkish Airlines. In 2017, Dr. Oz reportedly collaborated with Turkish Airlines on its “Fly Good Feel Good” project, which was designed to provide “an even more comfortable and healthy travel experience to its passengers.”⁶ During the campaign, Dr. Oz offered advice to the

² See <https://investor.turkishairlines.com/en/turkish-airlines/shareholding-structure>. (visited on May 2, 2022)

³ See <https://efile.fara.gov/docs/1839-Exhibit-AB-19750821-HHCRC405.pdf>. (visited on May 2, 2022)

⁴ See chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://efile.fara.gov/docs/6296-Exhibit-AB-20150521-1.pdf (visited on May 2, 2022)

⁵ See 22 U.S.C. § 611(c); 28 C.F.R. § 5.100.

⁶ “Healthy Flight Recipe at 30,000 feet from Dr. Mehmet Oz with Turkish Airlines' Fly Good Feel Good Project,” *Markets Insider*, July 24, 2017. See also, https://prnewswire2-a.akamaihd.net/p/1893751/sp/189375100/serveFlavor/entryId/1_scayste7/flavorId/1_2k7134eg/prn_folder/MN

passengers of Turkish Airlines as the airline flying to more countries than any other airline in the world, on healthy eating and exercises:

The collaboration between Turkish Airlines, Turkey's National Flag Carrier airline, and Dr. Oz is part of "Fly Good Feel Good" project, which was created to improve the brand experience Turkish Airlines provides to its passengers. The project features short videos with expert advice presented on the Turkish Airlines official website, social media accounts and in-flight entertainment systems, and printed papers.⁷

More recently, Dr. Oz appeared in an advertising campaign for Turkish Airlines including in a four-minute informational video offering a medical seal of approval to the airline's COVID-19 safety procedures."⁸ These campaigns constituted informational materials disseminated in interstate commerce by the foreign agent on behalf of the foreign principal but did not include the conspicuous statement labeling them accordingly as is required by the statute.⁹

Dr. Oz clearly serves as a foreign agent on behalf of the foreign principal Turkish Airlines. As you are also aware, the penalty for a willful violation of FARA is imprisonment for not more than five years, a fine of up to \$250,000, or both. Certain violations are considered misdemeanors, with penalties of imprisonment of not more than six months, a fine of not more than \$5,000, or both. We encourage you to fully investigate this matter.

Sincerely,



Aram Hamparian
Executive Director

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⁷ *Id.*

⁸ "Dr. Oz's blank slate in Pennsylvania," [Jewish Insider](#), Dec. 22, 2021.

⁹ See 22 U.S.C § 614; 28 C.F.R. § 5.400 and 5.402.