

ALERT

Former CIA Official Pleads Guilty to FARA-Related Violation and Mishandling of Classified Materials

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On April 23, 2025, Dale Britt Bendler, a former CIA officer and contractor, pleaded guilty to charges stemming from acting as a foreign agent while serving as a public official and mishandling classified materials. According to a U.S. Department of Justice (DOJ) press release, Bendler had spent over 30 years working directly for the agency as an intelligence officer. He retired from the CIA in 2014 as a member of the agency's Senior Intelligence Service. From 2014 to September 2020, he worked as a full-time contractor at the CIA and held a Top Secret/Sensitive Compartmented Information (TS/SCI) security clearance.

According to the plea agreement, from July 2017 through July 2020, Bendler worked with a U.S. lobbying firm and engaged in unauthorized and covert lobbying and public relations activities on behalf of foreign national clients. His lobbying activities included attempts to use his position and access within the CIA to influence a foreign government's ongoing embezzlement investigation into one of his clients. His activities also included an attempt to influence the U.S. government's decision to grant a visa to one of his clients who was allegedly involved with terrorism financing. Bendler was paid hundreds of thousands of dollars for these unauthorized lobbying tasks.

Bendler also admitted to unlawfully removing and retaining documents containing classified information, including information classified at the SECRET/NO FOREIGN DISSEMINATION (NOFORN) level, without authorization and storing them in unauthorized locations. During the course of his unauthorized lobbying activities, he

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used his access to search classified CIA systems for information related to his private lobbying clients, and improperly stored and disclosed non-public, sensitive, and classified information to unauthorized individuals.

In addition to his guilty plea, Bendler consented to forfeiture of \$85,000. He is currently facing a maximum penalty of seven years in federal prison – two years for acting as an agent of a foreign entity while also serving as a public official, and five years for mishandling classified material. Bendler is scheduled to be sentenced on July 16, 2025. Notably, as part of the agreement, Bendler consented to “make accurate and complete Foreign Agents Registration Act (“FARA”) filings with the FARA Unit of the National Security Division of the U.S. Department of Justice for his registrable activities on behalf of foreign principals, including his activities described in the Criminal Information” before his sentencing.

Bendler’s case comes on the heels of recent policy shifts at DOJ regarding criminal enforcement under the Foreign Agents Registration Act. Although Bendler’s plea agreement does not involve a charge under the FARA statute (22 U.S.C. § 611 *et seq.*), it does involve a charge under a FARA-related statute, 18 U.S.C. § 219. Pursuant to 18 U.S.C. § 219, it is a criminal offense for a “public official” of the United States in the executive, legislative, or judicial branches to be or to act as an agent of a foreign principal required to register under FARA. This recent plea agreement simply underscores that criminal prosecution remains a risk for parties that fail to comply with FARA and FARA-related statutes, and that the penalties for acting as an unregistered foreign agent can be severe in certain circumstances.

Wiley’s FARA Handbook provides further information on FARA and what may be on the horizon for FARA enforcement.

For more information on FARA and our related capabilities, please contact the attorney listed on this alert.

Jack Maniscalco, an International Trade Specialist at Wiley Rein LLP, contributed to this alert.