

## **Recent Decisions Clarify Narrow Scope of Exception to Notification Requirement for Agents of Foreign Governments Under 18 U.S.C. §951**

A discussion of two cases, 'United States v. Ji Chaoqun' and '*United States v. Alshahhi*,' both dealing with 18 U.S.C. §951, which criminalizes acting in the United States as an agent of a foreign government without notifying the attorney general.

U.S. District Judge Ronald A. Guzmán in the Northern District of Illinois recently issued an opinion in *United States v. Ji Chaoqun*, 1:18-cr-611 (N.D. Ill. Sept. 22, 2022), ECF No. 368. The publicly available opinion helps fill an important gap in 18 U.S.C. §951, which criminalizes acting in the United States as an agent of a foreign government without notifying the attorney general.

[Read the full article on \*New York Law Journal\*.](#)

### **Authors**



### **David Aaron**

Senior Counsel

[DAaron@perkinscoie.com](mailto:DAaron@perkinscoie.com)