So, You Caught Santa in Your House!

Do you need to report him as a foreign contact?



Let’s take a look at the facts—and ask a few important questions:

• You’re not exactly close. You only see him once a year.

• Does leaving milk and cookies count as providing foreign support?

• Canada and Russia have both been associated with claims about the North Pole. What citizenship does Santa claim?

• Receiving gifts from a foreign national could raise questions—whether you’ve been naughty or nice!

What does SEAD 3 say?

Security Executive Agent Directive 3 (SEAD 3) establishes reporting requirements for personnel with access to classified information or who hold a sensitive position.

SEAD 3, Section F, paragraph 2(b)(1) requires cleared individuals to report unofficial contact with a known or suspected foreign intelligence agency.

So, we have to ask:

• Do we know who Santa works for the other 364 days of the year?
• Was he simply delivering presents—or doing a little reconnaissance? Should we consider an insider-threat angle?

SEAD 3, Section F, paragraph 2(b)(2) also addresses continuing associations with known foreign nationals that involve bonds of affection, personal obligation, or intimate contact, as well as contacts involving an exchange of personal information. The reporting requirement depends on the nature of the relationship, regardless of how contact is made or maintained. Limited or casual public contact generally does not require reporting absent another applicable reporting requirement. Updates are required when the nature of an already-reported association significantly changes.

Santa's citizenship status

Tradition traces the modern Santa Claus image to Saint Nicholas and its evolution through Dutch settlers in New York. And, in December 2008, Canada's Minister of Citizenship, Immigration and Multiculturalism publicly announced Santa's Canadian citizenship.

For purposes of this holiday scenario, we'll assume Santa holds dual U.S. and Canadian citizenship.

The verdict

If your contact with Santa is limited to an annual visit and gift delivery, this humorous scenario suggests that reporting him as a foreign contact is not required. If the relationship changes—or you have any uncertainty about a real reporting obligation—consult your Facility Security Officer (FSO).

And if you find Belsnickel, Father Christmas, Saint Nicholas, Sinterklaas, or Krampus in your house… call your FSO!

Holiday humor only. This piece is not official guidance or a definitive interpretation of SEAD 3. Follow your organization's security policies and consult your FSO for actual reporting questions.