



U.S. Department of Justice

National Security Division

Counterintelligence and Export Control Section

Washington, DC 20530

August 17, 2017

**By FedEx**

RTTV America, Inc.  
c/o Brian E. Dickerson, Esquire  
FisherBroyles LLP  
1200 G Street, NW  
Washington, DC 20005

Re: Obligation of RTTV America, Inc. to Register Under the  
Foreign Agents Registration Act

Dear Mr. Dickerson:

Based upon your letters of January 4, 2013, and January 9, 2017, documents you have provided to this office, press reports, and other publicly available information,<sup>1</sup> we have determined that RTTV America, Inc. ("RTTV America") has an obligation to register under the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. §§ 611-621 (1995) ("FARA" or the "Act"). RTTV America's obligation to register arises from its political activities in the United States on behalf of RT and TV-Novosti, both foreign principals under the Act and proxies of the Russian Government, and its related work within the United States as a publicity agent and information-service employee of TV-Novosti.

**FARA**

The purpose of FARA is to inform the American public of the activities of agents working for foreign principals to influence U.S. Government officials or the American public with reference to the domestic or foreign policies of the United States, or with reference to the political or public interests, policies, or relations of a foreign country or a foreign political party.

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<sup>1</sup> See, e.g., Office of the Director of National Intelligence, *Assessing Russian Activities and Intentions in Recent US Elections* (2017) ("Intelligence Community Report"), [https://www.dni.gov/files/documents/ICA\\_2017\\_01.pdf](https://www.dni.gov/files/documents/ICA_2017_01.pdf). See also, e.g., Steven Erlanger, *Russia's RT Network: Is It More BBC or K.G.B.?*, N.Y. Times (Mar. 8, 2017), <https://www.nytimes.com/2017/03/08/world/europe/russias-rt-network-is-it-more-bbc-or-kgb.html>; Russ Read, *How Russia Wages Information Warfare in the United States*, Newsweek (Nov. 12, 2016), <http://www.newsweek.com/russia-wages-information-warfare-us-520469>; Rosie Gray, *How the Truth is Made at Russia Today*, BuzzFeed News (Mar. 13, 2014), [https://www.buzzfeed.com/rosiegray/how-the-truth-is-made-at-russia-today?utm\\_term=.ymRXWQ0Ndm#.fjKGxP7mJ6](https://www.buzzfeed.com/rosiegray/how-the-truth-is-made-at-russia-today?utm_term=.ymRXWQ0Ndm#.fjKGxP7mJ6).

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The term “foreign principal” includes “a government of a foreign country” and “a partnership, association, corporation, organization, or other combination of persons organized under the laws of or having its principal place of business in a foreign country.” 22 U.S.C. § 611(b).

An “agent of a foreign principal” is defined, in pertinent part, as “any person who acts as an agent . . . or . . . at the order, request, or under the direction or control” of a “foreign principal” and “(i) engages within the United States in political activities for or in the interests of such foreign principal;” or “(ii) acts within the United States as a . . . publicity agent, [or] information-service employee . . . for or in the interests of such foreign principal.” 22 U.S.C. § 611(c)(1)(i)-(ii).

The term “political activities” is defined in 22 U.S.C. § 611(o) as “any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or foreign political party.”

A “publicity agent” refers to “any person who engages directly or indirectly in the publication or dissemination of oral, visual, graphic, written, or pictorial information or matter of any kind, including publication by means of . . . broadcasts, motion pictures, or otherwise,” 22 U.S.C. § 611(h), while an “information-service employee” includes “any person who is engaged in furnishing, disseminating, or publishing accounts, descriptions, information, or data with respect to the political, industrial, employment, economic, social, cultural, or other benefits, advantages, facts, or conditions of any country other than the United States or of any government of a foreign country . . . .” 22 U.S.C. § 611(i).

### **RT and TV-Novosti are Proxies of the Russian Government**

RT (formerly “Russia Today”) is a Russian international television network, headquartered in Russia, that disseminates broadcasting content to the United States, among other countries.<sup>2</sup> RT America, according to its Facebook page, “is the US based arm of RT, a 24-hour English language international broadcast news network headquartered in Moscow.”<sup>3</sup> Financial information for RT shows that in 2015, 99.7% of the funds expended by RT

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<sup>2</sup> See “About RT,” RT.com, <https://www.rt.com/about-us/>.

<sup>3</sup> “About,” RT America Facebook Page, [https://www.facebook.com/pg/RTAmerica/about/?ref=page\\_internal](https://www.facebook.com/pg/RTAmerica/about/?ref=page_internal). See also “RT America” Tab, RT.com, <https://www.rt.com/on-air/rt-america-air/> (“[RT America] delve[s] deep into the most important issues on the US agenda, report[s] the other side of the story, and explore[s] unanswered – and unasked – questions.”).

(amounting to \$285 million) came from the Russian government.<sup>4</sup> Accordingly, RT meets the definition of a “foreign principal” pursuant to FARA. *See* 22 U.S.C. § 611(b)(3).

Moreover, the U.S. Intelligence Community has assessed that RT also serves as the Russian Government’s “principal international propaganda outlet.”<sup>5</sup> Indeed, Russian President Vladimir Putin has explicitly said that “[RT] is funded by the [Russian] government, so it cannot help but reflect the Russian Government’s official position on the events in our country and in the rest of the world.”<sup>6</sup> Similarly, RT’s editor-in-chief, Margarita Simonyan, has acknowledged that “since RT receives its budget from the state, it must complete tasks given by the state.”<sup>7</sup> Simonyan has also referred to RT as “an information weapon,” noting that, in the United States “people will already be watching [RT] . . . at the critical moment we will have this audience already built up, an audience that is looking to us for the other side of the truth, and we will certainly take advantage of that.”<sup>8</sup> Accordingly, to the extent RT serves as a proxy of the Russian government, it qualifies as a “foreign principal” for that reason as well.

RT is owned by TV-Novosti, a news organization designated under Russian law as an autonomous non-profit organization (ANO).<sup>9</sup> According to the plain language of one of the contracts that you provided, TV-Novosti is a “legal entity registered in due form under the laws of the Russian Federation,” with its principal place of business in Russia.<sup>10</sup> Under the statutory

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<sup>4</sup> Leonid Bershidsky, “Beware of RT’s Charade of Independence from Putin,” Bloomberg (Jan. 10, 2017), <https://www.bloomberg.com/view/articles/2017-01-10/beware-of-rt-s-charade-of-independence-from-putin>.

<sup>5</sup> Intelligence Community Report at 3.

<sup>6</sup> “Putin Visits New HQ of State-Funded External Broadcaster,” Kremlin.ru (June 13, 2014).

<sup>7</sup> Dozhd Online (July 11, 2012), [https://tvrain.ru/teleshov/harddaysnight/margarita\\_simonjan\\_o\\_dzhuliane\\_assanzhe\\_pussy\\_riot\\_i\\_gosdepe\\_polnaja\\_versija-327931/](https://tvrain.ru/teleshov/harddaysnight/margarita_simonjan_o_dzhuliane_assanzhe_pussy_riot_i_gosdepe_polnaja_versija-327931/). In a separate 2012 interview, Simonyan noted that Aleksey Gromov, Presidential Administration Deputy Chief of Staff, oversaw RT political coverage, including having in-person meetings with media managers in which he shared classified information and discussed media coverage plans. Annex A to Intelligence Community Report, at 9.

<sup>8</sup> Ilya Azar, “Russia Today Chief Editor Interviewed on Objectivity, Role of Media, Information Warfare,” Lenta.ru (Mar. 7, 2013).

<sup>9</sup> *See, e.g.*, “Contact info,” RT.com, <https://www.rt.com/about-us/contact-info/>. One commentator has even claimed that TV-Novosti and RT are one and the same, with RT being “officially known as ANO TV Novosti.” *See* Bershidsky, *supra*, n.4.

<sup>10</sup> *See* Letter from B. Dickerson to A. Mudd, (Jan. 4, 2013) (hereinafter, “2013 Letter”), Ex. 16 (Contract No. 1001/08-10) (Aug. 17, 2010) (quoted language in preamble to agreement).

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definition quoted above, TV-Novosti also qualifies as a “foreign principal” under the Act. *See* 22 U.S.C. § 611(b)(3).

### **Bases for Requiring RTTV America’s Registration Under FARA**

#### *1. RTTV America Is an Agent of Both RT and TV-Novosti*

RTTV America describes itself as a “Broadcasting and Media Production Company,”<sup>11</sup> and it operates in the United States on behalf of RT, for whom it is an alter ego. The website that RTTV America lists on its Facebook page is the website for RT, and it apparently operates from the same offices in Washington, DC that RT uses.<sup>12</sup> RTTV America, therefore, operates as an agent of RT for purposes of FARA.

Relatedly, RTTV America also operates as an agent of TV-Novosti. According to your correspondence with us and the contractual documents attached thereto, RTTV America has provided two types of services to TV-Novosti.<sup>13</sup> First, from at least August 11, 2005, until August 1, 2014, two “production agreements”<sup>14</sup> obligated RTTV America to produce television programs and news segments<sup>15</sup> in the United States, which were uploaded to TV-Novosti and then broadcast almost immediately within the United States.<sup>16</sup> Second, since at least April 5,

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<sup>11</sup> RTTV America Facebook Page, <https://www.facebook.com/pages/RTTV-America/144605132241060>.

<sup>12</sup> *See id.* The operations of RT and RTTV America are, in essence, commingled in Washington, DC. Both RT and RTTV America occupy office space at 1325 G St., NW, Washington, DC. RT, for its part, states on its website that it “broadcasts from its studios in Washington, DC.” *See* “About Us.” RT.com, <https://www.rt.com/about-us/>.

<sup>13</sup> *See* 2013 Letter at 2-3; *id.*, Ex. 16 (Contract No. 1001/08-10). *See also* Letter from B. Dickerson to C. Rones (Jan. 9, 2017) (hereinafter, “2017 Letter”).

<sup>14</sup> Per your prior correspondence, those production agreements were terminated in 2014, *see* 2017 Letter at 1, but the obligation to register continues even as to completed activities, *see* 22 U.S.C. § 618(e). Furthermore, despite RTTV America’s claim that it no longer plays a role in RT America content, the RTTV America Facebook page is continually updated with photographs and commentary regarding current content production out of the RT America studios. *See* RTTV America Facebook Page, <https://www.facebook.com/pages/RTTV-America/144605132241060>. This RTTV America Facebook page is separate and apart from the RT America page, indicating that RTTV America may continue to play more of a role in RT America production activities than the 2014 agreement would suggest. *See* RT America Facebook Page, <https://www.facebook.com/RTAmerica/>.

<sup>15</sup> RTTV America content includes news stories, editorial commentary, and promotions of destinations in Russia.

<sup>16</sup> 2013 Letter at 3; Ex. 9 (Contract No. 05-24RT § 1.1 (Aug. 11, 2005) (obligating RTTV America to “gather information, prepare and render to [TV-Novosti] news materials and

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2007, pursuant to other agreements, RTTV America has arranged for the distribution in the United States of RT, the television channel, by purchasing broadcast channel access from hotels and cable companies and reselling that access to TV-Novosti “to broadcast RT.”<sup>17</sup> The most recent contract that you provided does not expire until August 31, 2017.<sup>18</sup> (If there are new agreements in place between RTTV America and TV-Novosti, please provide those as part of your registration.)

## 2. RTTV America Has Engaged in “Political Activities” Under FARA

According to RT’s own website, part of RT’s mission is to “acquaint . . . international audiences with a Russian viewpoint on major global events,”<sup>19</sup> and a sample of RT’s programming reflects a demonstrable Russian government viewpoint. Indeed, the Intelligence Community has concluded that RT is “a messaging tool . . . [used] to undermine faith in the US Government and fuel political protest.”<sup>20</sup> In a 2012 interview, TV-Novosti General Manager Aleksey Nikolov noted that content from RT America and other foreign bureaus “only becomes [RT] content after the corresponding editorial work is performed on it here, in the Russian office.”<sup>21</sup>

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communications about events and fact that take place in the . . . United States of America and adjacent territories which have informational character”); *id.*, Ex. 10 (Agreement No. 06-01 RT § 1.2 (July 1, 2009) (obligating RTTV America to produce “news blocks” and “TV programs” for TV-Novosti)); *id.* at 3, 5 (TV-Novosti broadcasts content from RTTV America “within three seconds” of receipt). *See also, e.g.*, 2017 Letter at Ex. 15 (Appendix No. 1 to Contract No. 1001/08-10 from August 17, 2010) (mandating RT be broadcast via Time Warner Cable in New York, New Jersey and California); 2013 Letter at Ex. 12 (Contract No. 871/04-07, § 1.1 (Apr. 5, 2007) (defining the subject of the contract as the broadcast of Russia Today TV within the “Territory,” which is defined as “Washington, DC (United States of America)”).

<sup>17</sup> 2013 Letter at 3 (citing Exs. 11-20). *See also, id.*, Ex. 11 (Contract No. 130, at 1 (Dec. 27, 2011)) (defining the “TV-Programme” to be distributed as “Russia Today TV (RTTV) (US edition).”).

<sup>18</sup> 2017 Letter, Ex. 10 (Additional agreement No. 8 to the Contract No. 1000/08-07 (June 18, 2015) (extending distribution agreement to August 31, 2017)).

<sup>19</sup> “About Us,” RT.com, <https://www.rt.com/about-us/>.

<sup>20</sup> Intelligence Community Report at 3, 6. *See also* Clint Watts, “Statement Prepared for the U.S. Senate Select Committee on Intelligence Hearing: ‘Disinformation: A Primer In Russian Active Measures and Influence Campaigns,’” (Mar. 30, 2017), <https://www.intelligence.senate.gov/sites/default/files/documents/os-cwatts-033017.pdf>.

<sup>21</sup> Danilo Shepovalnikov, “Other TV,” COMNEWS (Sept. 19, 2012), <http://www.comnews.ru/node/67949#ixzz4alUT012r>.

RT's broadcasts consistently mirror the opinions of the Kremlin, which, together with the state funding and other indicia of agency described above, indicate that both RTTV America and TV-Novosti act as alter egos of the Kremlin in ensuring dissemination of the Russian Government viewpoint on key political events. Therefore, the Russian Government itself should be construed as a foreign principal on whose behalf RTTV America is engaged in political activities in the United States.

For example, an April 5, 2017, broadcast of the RT America show, "News with Ed," featured a guest calling into question the U.S. contention that Syrian president Bashar al-Assad had used chemical weapons against Syrian civilians.<sup>22</sup> A week later, an RT America broadcast continued that theme with another piece questioning the legitimacy of the U.S. Government's evidence that President Assad was behind the April 4, 2017, chemical attack.<sup>23</sup> This narrative mirrors the messaging coming out of the Kremlin, which posited that the chemical weapons were released when a rebel chemical stockpile was hit during airstrikes.<sup>24</sup>

Other recent examples of the alignment between RT America's coverage and Kremlin messaging include the following:

- After the United States announced new sanctions in response to Iran's ballistic missile testing in January 2017, RT America's coverage echoed the Kremlin's message that the ballistic missile testing did not violate the Joint Comprehensive Plan of Action (JCPOA).<sup>25</sup>
- In response to the release of the Intelligence Community Report, which highlighted the Kremlin's use of RT as a propaganda tool, both RT America's coverage of the report and the response from the Kremlin focused on claims that

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<sup>22</sup> "Trump has 'drunk the Kool Aid' on Syrian narrative – fmr diplomat," RT America YouTube Channel (Apr. 5, 2017), <https://www.youtube.com/watch?v=wK9e0v18tPk>.

<sup>23</sup> "US report on Idlib attack 'misinterprets evidence,' 'politically motivated' – professor," RT America YouTube Channel (Apr. 12, 2017), <https://www.youtube.com/watch?v=8BAzQwOepcU>.

<sup>24</sup> See, e.g., Tom O'Connor, "Putin, Russian Military Accuse Syrian Rebels of Framing Assad to Draw U.S. Support," Newsweek (Apr. 11, 2017), <http://www.newsweek.com/russia-military-putin-rebel-chemical-attack-us-support-582621>.

<sup>25</sup> Compare "Trump threatens Iran with sanctions, vows to scrap historic treaty," RT America YouTube Channel (Feb. 3, 2017), [https://www.youtube.com/watch?v=ckJl7G\\_DLkk](https://www.youtube.com/watch?v=ckJl7G_DLkk), with Ladane Nasseri and Alexei Anishchuk, "Europe, Russia Weigh In on Iranian Missiles as UNSC to Meet," Bloomberg (Jan. 31, 2017), <https://www.bloomberg.com/news/articles/2017-01-31/eu-russia-weigh-in-on-iran-missiles-as-security-council-to-meet>.

the report lacked any real evidence of Russian involvement in election interference.<sup>26</sup>

- Criticism of NATO is also a frequent theme in RT America broadcasts.<sup>27</sup> In a March 29, 2017 broadcast, for example, RT America presented news of the U.S. Senate vote to accept Montenegro into NATO.<sup>28</sup> RT America's opposition to Montenegro's entry into NATO aligns with the Russian government's vocal opposition to both the admission of Montenegro into NATO and to NATO as an organization.<sup>29</sup>

In sum, RTTV America is obligated to register under FARA because: (1) through its production and distribution of programming for RT broadcasts in the United States, it seeks to "influence . . . any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States, or with reference to the political or public interests, policies, or relations" of Russia, for or in the interests of Russia, and is therefore engaged in "political activities," *see* 22 U.S.C. § 611(o); and (2) it has acted as an agent of both RT and TV-Novosti in producing and distributing the content constituting those political activities (as described in more detail below).

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<sup>26</sup> Compare "ODNI report on Russian interference is 'utter embarrassment' – Chris Hedges," RT America YouTube Channel (Jan. 10, 2017), <https://www.youtube.com/watch?v=XamSi1DJFUo>, with Andrew V. Pestano, "Kremlin: U.S. report on Russian hacking 'unfounded,' 'amateurishly emotional,'" UPI (Jan. 9, 2017), [http://www.upi.com/Top\\_News/World-News/2017/01/09/Kremlin-US-report-on-Russian-hacking-unfounded-amateurishly-emotional/5821483979291/](http://www.upi.com/Top_News/World-News/2017/01/09/Kremlin-US-report-on-Russian-hacking-unfounded-amateurishly-emotional/5821483979291/).

<sup>27</sup> See, e.g., "Military buildup is a gesture of 'American commitment' – ex-diplomat," RT America YouTube Channel (Jan. 16, 2017), <https://www.youtube.com/watch?v=kKOGcY-EgrY>; "NATO accused of warmongering against Russia," RT America YouTube Channel (June 21, 2016), <https://www.youtube.com/watch?v=BdVxroezcww>; "'NATO was created for aggression in first place': Kremlin on reports of new Western buildup," RT.com (Nov. 7, 2016), <https://www.rt.com/news/365644-nato-aggression-created-kremlin/>.

<sup>28</sup> See "NATO Wants to Bring Us 'As Close as Humanly Possible' to War," Ron Paul Institute (featuring March 29, 2017 RT footage), <http://www.ronpaulinstitute.org/archives/peace-and-prosperity/2017/march/30/nato-wants-to-bring-us-as-close-as-humanly-possible-to-war/>.

<sup>29</sup> See, e.g., "Russia calls U.S. Approval of Montenegro's NATO Bid 'Deeply Mistaken,'" RadioFreeEurope (Apr. 14, 2017), <https://www.rferl.org/a/russia-calls-us-approval-montenegro-nato-bid-deeply-mistaken/28429017.html>; Jason Le Miere, "Russia Suggests Trump is no Different From Obama After Montenegro NATO Approval," Newsweek (Apr. 13, 2017), <http://www.newsweek.com/russia-trump-obama-montenegro-nato-583688>; Jack Farchy, "Putin names Nato among threats in new Russian security strategy," Financial Times (Jan. 2, 2016), <https://www.ft.com/content/6e8e787e-b15f-11e5-b147-e5e5bba42e51>.



3. *RTTV America Also Has Served as a "Publicity Agent" and "Information-Service Employee" for TV-Novosti and RT*

RTTV America's obligation to register under FARA is also triggered by two other aspects of its work on behalf of TV-Novosti. First, by producing television programs within the United States that TV-Novosti would later redistribute as part of RT (including distribution within the United States) and by securing channels that TV-Novosti used to distribute RT programming (including but not limited to the programs that RTTV America produced), RTTV America "engage[d] directly or indirectly in the . . . dissemination of . . . broadcasts," and therefore served as a "publicity agent."<sup>30</sup> 22 U.S.C. § 611(h). Second, because its programming concerned "conditions" of a foreign government or "foreign country," including but not limited to Russia, RTTV America also served as an "information-service employee" by "furnishing, disseminating, or publishing" those programs. 22 U.S.C. § 611(i).

In your correspondence, you have argued that "RTTV America is not under the control or ownership of any foreign entity" and does not "seek or follow any editorial views from any foreign entity."<sup>31</sup> As you put it, "RTTV America simply produces content which TV-Novosti elects to broadcast or not."<sup>32</sup> However, FARA applies broadly to all "agent[s]," "employee[s]," and "servant[s]" of foreign principals, including "any person who acts . . . at the order [or] request" of a foreign principal. 22 U.S.C. § 611(c)(1). By directing RTTV America's actions through the agreements at issue, TV-Novosti established an agency relationship sufficient to satisfy the statute, regardless of the extent to which TV-Novosti allowed RTTV America editorial latitude in the creation of content. Because RTTV America undertook (and in the case of distribution of RT content, continues to undertake) the foregoing activities in the United States pursuant to contract with (and at cost to) TV-Novosti, those actions were undertaken "for or in the interests of" TV-Novosti. *See* 22 U.S.C. 611(c)(1)(ii). As noted above, because TV-Novosti is a "legal entity registered in due form under the laws of the Russian Federation," with its principal place of business in Russia,<sup>33</sup> it qualifies as a "foreign principal" under FARA. *See* 22

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<sup>30</sup> Margarita Simonyan has implied that the corporate arrangement between RTTV America and TV-Novosti is, at least in part, an attempt to avoid RTTV America being considered a foreign agent. In an October 2012 interview addressing the differences between FARA and the then-draft Russian foreign agent registration law, Simonyan commented that "in America, we are not a foreign agent because we operate through a commercial organization in America. That is, our broadcasts in America are carried by an American commercial organization, and we simply transfer money to them." Dozhd Online (July 11, 2012), [https://tvrain.ru/teleshov/harddaysnight/margarita\\_simonjan\\_o\\_dzhuliane\\_assanzhe\\_pussy\\_riot\\_i\\_gosdepe\\_polnaja\\_versija-327931/](https://tvrain.ru/teleshov/harddaysnight/margarita_simonjan_o_dzhuliane_assanzhe_pussy_riot_i_gosdepe_polnaja_versija-327931/).

<sup>31</sup> 2013 Letter, at 5.

<sup>32</sup> *Id.*

<sup>33</sup> *See, e.g., id.*, Ex. 16 (Contract No. 1001/08-10 (Aug. 17, 2010) (quoted language appearing in preamble to agreement)).



U.S.C. § 611(b)(3). Indeed, you have previously conceded that RTTV America acts as TV-Novosti's agent.<sup>34</sup> Therefore, RTTV America has been acting, and continues to act, as an agent of a foreign principal and therefore is obligated to register under FARA.

Moreover, the contracts expressly give TV-Novosti the option of exercising editorial control over RTTV America's programming and distribution activities. As to the programs RTTV America produced for it, TV-Novosti was entitled to "[g]ive directions to [RTTV America], related to the services rendered under this Contract, which [RTTV America] [was] obliged to perform."<sup>35</sup> And as to the distribution contracts, TV-Novosti has the right to "[e]nsure that the content of the TV-programme will be in compliance with the requirements of the legislation of the Russian Federation about mass media."<sup>36</sup> In addition, under the distribution contracts, TV-Novosti also directs RTTV America to monitor the use of the RT content it distributes pursuant to those contracts. Specifically, the distribution agreement currently in effect until August 31, 2017, mandates RTTV America to "disallow any use of the TV-programme that may damage the professional integrity, accuracy, or editorial, artistic and technical quality of the TV-programme, or mutilates the content of the TV-programme."<sup>37</sup>

Finally, although you have not raised it, we note that although FARA does provide an exception for "bona fide news or journalistic activities," *see* 22 U.S.C. § 611(d), that statutory exemption does not apply to RTTV America's activities. The media exemption only applies if a media outlet "is not owned, directed, supervised, controlled, subsidized, or financed, and none of its policies are determined by any foreign principal[.]" *Id.* As already noted, RTTV America receives funding from TV-Novosti, which retains editorial control over programming content.

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<sup>34</sup> *See* 2017 Letter at 3 (describing TV-Novosti as RTTV America's "foreign principal").

<sup>35</sup> 2013 Letter, Ex. 9 (Contract No. 05-24RT, ¶ 2.1.2). *See also* 2013 Letter, Ex. 10 (Agreement No. 06-01RT, ¶ 2.2.2 ("The Client shall: Give directions to the Contractor, related to the services rendered under this Contract, which the Contractor is obliged to perform."); 2013 Letter Ex. 9 (Contract No. 05-24RT, ¶ 2.1.1 ("The Customer shall have the right to: Control the course and the quality of the Services rendered by the Contractor but at the same time not to interfere in the activity of the Contractor.")); 2013 Letter, Ex. 10 (Agreement No. 06-01RT, ¶¶ 1.2.2, 2.2.3 (requiring the parties to agree on the "theme of audiovisual product, length and other conditions" and giving TV-Novosti the right "[t]o check at any time the progress and quality of services rendered" without "interfering in . . . day-to-day operation," as well as the right to "[p]ropose" and "decline the candidates to the position of news reader")

<sup>36</sup> *See, e.g.*, 2013 Letter, Ex. 16 (Contract No. 1001/08-10 (Aug. 17, 2010) at ¶ 2.1.3).

<sup>37</sup> 2013 Letter, Ex. 17 (Contract No. 1000/08-07 (Aug. 22, 2007), at ¶ 2.3.3); 2017 Letter, Ex. 10 (Additional agreement No. 8 to the Contract No. 1000/08-07 (June 18, 2015) (extending distribution agreement to August 31, 2017)). *See also* n.19, *supra* (interview with RT General Manager Aleksey Nikolov in which he stated that foreign bureau content is put through an editorial process in Russia).

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**Conclusion**

For the reasons stated above, RTTV America has an obligation to register under FARA. To be clear, registration would not require RTTV America to alter the content of its programming in any manner; indeed, if registered as required, RTTV America would be free to facilitate the dissemination of any content it chooses. Rather, registration would simply allow media outlets purchasing RTTV America programming, and American viewers watching such programming, to be fully informed regarding the foreign influence behind the content on the network.

Please effect RTTV's registration within thirty (30) calendar days of the date of this letter.

Useful information and forms needed for registration may be found on our website at <http://www.fara.gov>. If you have any questions regarding registration, or have additional information to provide, please contact (b) (6), (b) (7) by telephone at (202) 233-0776 or by e-mail at [FARA.public@usdoj.gov](mailto:FARA.public@usdoj.gov).

Sincerely,

Heather H. Hunt  
Chief, FARA Registration Unit