

Barely Legal: Digital Politics and Foreign Propaganda

Shannon C. McGregor (PhD), University of Utah

Bridget Barrett, University of North Carolina

Daniel Kreiss (PhD), University of North Carolina

Prepared for presentation at the Political Communication Pre-conference at the annual meeting
of the American Political Science Association, Washington DC, August 28, 2019

Introduction

In the wake of the 2016 U.S. presidential election, important research has focused on the efforts by the Russian government, through social media platforms like Twitter and Facebook, to influence U.S. citizens attitudes and behaviors (Kim et al., 2018). In 2018, the U.S. Department of Justice charged 13 Russian nationals and three Russian companies for a scheme to interfere in the U.S. political system.¹ Despite this work, to our knowledge little research has focused on the *legal* work that U.S. political firms routinely engage in on social media platforms on behalf of foreign countries. Well-known digital political consultancies engage in this work on behalf of foreign governments including Craft Media Digital, Targeted Victory, and SCL Limited (formerly Cambridge Analytica).

In this study, we map the work U.S. digital consultancies and public relations firms undertake across social media and digital platforms of behalf of foreign governments, the content of these efforts, and the extent to which it appears in U.S. news coverage. We examine these activities based on documents U.S. firms must provide to the U.S. Department of Justice as part of the Foreign Agent Registration Act (FARA), which is “a disclosure statute that requires persons acting as agents of foreign principals in a political or quasi-political capacity to make periodic public disclosure of their relationship with the foreign principal, as well as activities, receipts and disbursements in support of those activities².”

¹ <https://www.justice.gov/opa/pr/grand-jury-indicts-thirteen-russian-individuals-and-three-russian-companies-scheme-interfere>

² “Home Page,” US Department of Justice Foreign Agents Registration Act, accessed October 23, 2016, <https://www.fara.gov/>

We find that agents acting on behalf of foreign principals used a range of different strategies on social and digital media. We found websites and social media accounts, as well as paid social media posts and native digital advertising, very few of which featured disclosures linking to the content to their country of origin. Firms also targeted journalists and other elites, but exactly how is not clear. Though we did have some interesting findings, the most powerful findings regard what is absent. Our study revealed more about the inconsistencies and inadequacies of the current FARA disclosure process – as well as important gaps in tech firms’ ad archives – than it did about the content of the messages themselves. We conclude with a series of recommendations for improved labeling and archiving by technology firms, as well as recommendations about requirements for and enforcement of existing FARA regulations as they relate to social and digital content.

Description of FARA

The Foreign Agent Registration Act (FARA), established in 1938, was created so that both the US government and the public would know what foreign countries are attempting to sway public opinion, influence policy, and shape laws ([FARA Frequently Asked Questions, 2017](#)). “Foreign agents” specified in the act are any “public relationship counsel, publicity agent, information service employee, or political consultant” working for a “foreign principal” (foreign political parties or government, foreign individuals, and any business entity based outside of the United States) (FARA, Section 611, Definitions c: ii). In this way, FARA requires advertising agencies as well as political consultants to declare their relationships with foreign actors for lobbying as well as more general communications purposes. Diplomats and their staff are

exempt, as are purely commercial partnerships and academic, religious, and humanitarian work (FARA Frequently Asked Questions, 2017).

FARA is written to create transparency in foreign influence attempts in the US in two ways. The first is through the registration and filing process—any person or business working with a foreign entity for political or public relations purposes must register as a foreign agent and report their income, expenditures, and business agreements (ibid). Any communication materials disseminated for that foreign entity must be filed with the Department of Justice, although we find this rarely happens in practice. The second requirement to achieve transparency is through labeling—any “informational materials” that a foreign agent publishes and circulates on behalf of the foreign entity should include a “conspicuous statement” including the name of the registrant and the name of the foreign principal (ibid). Notably, the phrasing of the law’s requirements on labeling and filing are broad enough to include websites and social media pages; the applicability to individual Facebook posts or tweets on Twitter has not been clearly specified by the Department of Justice.

Administered through the Department of Justice, violating FARA technically can carry criminal penalties in addition to civil ones. However, FARA is generally unenforced and ignored. The Department of Justice has brought only seven criminal FARA cases since 1966 (Audit of the National Security Division’s Enforcement and Administration of the Foreign Agents Registration Act, 2016). The limitations of FARA are well documented. The act was amended in 1966 in order to change the focus from propaganda to economic interests and narrow the definition of a foreign agent to the still-broad understanding that it has today (Straus, 2019). And yet, even with these clarifications, the law was still underenforced with registrants commonly leaving out

significant information on their activities. Legal scholars have repeatedly highlighted the problems with the act, from the lack of enforcement from the Department of Justice (Atieh, 2009) to former government officials not registering while lobbying for foreign countries (Spak, 1989).

In addition to scholarly concerns, the Government Accountability Office (GAO) has periodically documented the issues in compliance and enforcement. The GAO conducted a study in 1974 that found that 70% of registrations “were incomplete or lacked sufficient detail” and that the DOJ “has not adequately enforced the act and related regulations” (Government Accountability Office, 1974). The report recommended more resources and enforcement. These calls were repeated in a GAO investigation into the effectiveness of the act in 1980, this time also including examples of foreign agents who were not registered and recommendations on how to reformat the registration papers to better reflect what is required by law (Fasick, 1980). In yet another updated report in 1990, the Comptroller General again reported that the recommendations had not been followed and that the requirements of the act (from registration to updating statements to fully disclosing activities to enforcement) were still not being fulfilled (Conahan, 1990). Finally, as recently as September of 2016, the Office of the Inspector General released yet another report with fourteen recommendations incredibly similar to those that came before (Audit of the National Security Division’s Enforcement and Administration of the Foreign Agents Registration Act, 2016).

As we will revisit later, the Russian interference in the 2016 presidential election has sparked media, Department of Justice, and congressional interest in updating and properly enforcing FARA. After FARA was used in the indictments against President Trump’s aids Paul

Manafort and Michael Flynn after the 2016 election, registrations increased significantly: first time filings rose 50% between 2016 and 2017 and supplemental statements from existing registrants doubled (Ainsley et al., 2018).

FARA in Research

Since FARA filings are rarely enforced, the data within each registration can vary wildly. At the very least, however, the names of the companies, who they are working for, a broad goal or description of activities, and the amount of money are typically included. Even with its limitations, FARA registrations can shed light on the goals and achievements of foreign governments' investments.

Based on FARA filings, the primary purposes of foreign entities paying for public relations in the United States are unsurprisingly for economic and policy reasons. Lee (2006) analyzed FARA data to better understand what foreign countries were investing in, or at least were reporting their investments in. Broadly, FARA filings between 1997 and 2003 reveal that the primary activity foreign entities paid for was meetings with government officials and congressional leaders followed by broader types of information dissemination (Lee, 2006). The goals of these expenditures most commonly fell into economic or trade-related purposes. These findings are generally congruent with Zhang's (2005) analysis of FARA filings from the first halves of 1997, 1999, and 2002, which found the most common goal to be to "attract tourism and investment" followed by building policy agendas.

Information on broad goals and budgets associated with those goals have also enabled public relations scholars to try to measure macro indicators of success from foreign countries' investments in lobbying and communication campaigns. Generally, research relying on FARA

finds that investments in public relations campaigns in the US have limited but identifiable relationships in changes in the press coverage of the country, both in decreased negative news coverage (Albritton & Manheim, 1983; Manheim & Albritton, 1987; Kiouisis & Xu, 2008) and in increased coverage across media (Lee, 2007). But these efforts don't always work as intended — China's increased investment in a public relations campaign in 2000 may have slightly reduced negative coverage in the New York Times but not four other newspapers, and only for a brief period of time (Zhang & Cameron, 2003). Across 27 countries, a country's heavier investment in public relations did not increase that country's prominence in US news coverage, though the investment did correlate with a more positive public opinion toward some countries (Lee & Hong, 2012).

Similarly, FARA data also reveals relationships between economic successes and public relations investments, including increases in U.S. imports, U.S. direct investments, and increase in tourism from the U.S. (Lee & Yoon, 2010). Rojas et al. (2007) similarly found strong associations between lobbying expenditures and numbers of American tourists visiting the Caribbean. Findings from studies using FARA data that show macro relationships between public relations investment and increases in news coverage or improved public opinion are supported by significant literature showing that foreign countries value these investments and that, at some level, international public relations and lobbying campaigns work (Modoux, 1989; Sachs, 1992; Grunig, 1993; Manheim, 1994; Sant, 1999; Gilboa, 2001; Kunczik, 2003).

In addition to studies on how effective public relations can be, FARA statements have been used to understand common strategies of public relations from foreign countries and how their investments, strategies, and organizational structures shift over time. In the 1940s, Ettinger

documented what he saw as examples of how “the art of engineering public opinion has reached a high degree of perfection” (p. 336). The strategies commonly used by foreign individuals, governments, and business groups to improve their image included book and magazine publishing; distribution of films in schools and libraries; submitting suggestions for speeches to officials; speaker tours; and cultural events such as parades and folk dancing events (Ettinger, 1946). Johnson (2005) used FARA filings to document Mexico’s changing public relations strategies in the United States from the 1940’s to 1991. After the 1970’s, both production, distribution, and exhibition of audio-visual communications and lobbying increased drastically— at the same time, the target audience of the communications expanded from tourists to businesses, Washington insiders, elected representatives, and government agencies (Johnson, 2005).

But not all foreign investments aim for economic advantages or favorable news coverage. FARA filings also reveal reactionary strategies designed to manage U.S public opinion. In the wake of the September 11th attacks, Saudi Arabia increased its public relations and lobbying efforts in the U.S. (Al-Yasin & Dashiti, 2009). Similarly, political crises like Iraq’s invasion of Kuwait and the Bank of Commerce and Credit International scandal led to an increased investment in lobbying and public relations efforts by Kuwait and the United Arab Emirates, respectively (ibid). Their analysis of not only the expenditures but also the communication strategies highlighted how instances of false and misleading information were being included in these PR campaigns carried out by U.S. agencies.

This work all shows how even if not every foreign agent registers and files their communications with the Department of Justice, the data can still be useful. Public relations

tactics and goals change with the media landscape and other exogenous factors – understanding current campaigns run by major public relations companies, that are privy to novel techniques and best practices, can aid both the government and the public in understanding how and when these tools may be used by other actors.

Despite the politically relevant nature of activities disclosed through FARA, and the clear connection to strategic communication and journalism, this data has not oft been examined from the political communication perspective. Of the studies we reviewed, one was published in the *British Journal of Political Science* (Manheim & Albritton, 1987) and another in *Public Opinion Quarterly* (Ettinger, 1946). The primary publisher of FARA research is *Public Relations Review*, accounting for eight of the thirteen studies referenced. Overall, FARA has primarily been used to address research questions around journalistic coverage and economic outcomes from public relations and lobbying investment. The rise – and now ubiquity – of social and digital platforms is well-documented in political communication literature, but we know little about the role these platforms play in foreign efforts to influence U.S. policy and public opinion. Beyond the well-documented illegal efforts by Russia to interfere with the U.S. 2016 election through social media platforms (Jamieson, 2018; Kim et al., 2018; Assessing Russian Activities and Intentions in Recent US Elections, 2017), we know little about the apparently legal efforts that U.S. firms engage in on behalf of foreign countries. As we will reveal, the data from FARA registrations is incomplete and limited, but the rare complete registrations shed light on the digital communication strategies of other countries and onto current trends in foreign public relations and lobbying strategies.

Results: Foreign Actors, Domestic Firms, and Social Media

Our analysis proceeds in a few ways. First, we turn to FARA filings to map the disclosed work of U.S. digital political consultancies for foreign governments or entities. Next, relying on data made available to us by analysts at the FBI, we examine the work done by U.S. public relations firms for foreign governments or entities, with an express focus on social media efforts.

Mapping the work of political consultancies

We begin our examination by reviewing the disclosed work of U.S. digital political consultancies on behalf of foreign governments or entities. We began with a list of firms founded by former presidential campaign staffers from 2004-2016, which have been previously used in analyses of political innovation and entrepreneurship. We supplemented this list using the *Campaigns & Elections* campaign services directory for digital consulting. Taken together, we selected ten Democratic and ten Republican firms that are prominent purveyors of digital services in electoral politics. On the Democratic side, the firms are BlueLabs, CivisAnalytics, Blue State Digital, Revolution Messaging, Bully Pulpit Interactive, Precisions Strategies, AKPD Message and Media, 270 Strategies, Trilogy Interactive, and Wells & Lighthouse. Republican firms in this analysis are Echelon Insights, Targeted Victory, WPAi, Deep Root Analytics, Red Oak Strategic, Giles-Parscale, Campaign Solutions, Mosaic, FP1, and Harris Media. We ran the name of each firm through the recently set up searchable database³ of FARA filings. Of the 20 firms we searched, only one had filed FARA disclosure statements: Targeted Victory.

Targeted Victory is a prominent Republican consultancy founded in 2009 by Zac Moffatt, a veteran of the Republican National Committee who also served as the digital director for Romney's 2012 bid for the presidency. Targeted Victory is widely-acknowledged as an industry

³ <https://efile.fara.gov/ords/f?p=1235:10>

leader in digital consulting in Republican politics, including running the digital media for the 2016 Republican National Convention. In addition to their own disclosure statements, Targeted Victory appears in a number of filings from Qorvis as a disclosed payee of disbursements. Qorvis is a Washington, D.C. based PR firm whose other FARA filings reveal that they have done work for Bahrain, the Kurdistan Regional Government, the Republic of Equatorial Guinea, the Embassy of the People's Republic of China, and Saudi Arabia. Targeted Victory's FARA filings, both individual and as referenced in Qorvis filings, are all related to work for the Kingdom of Saudi Arabia. From 2015 through 2017, Targeted Victory brought in over \$1.6 million for their work on behalf of Saudi Arabia.

The FARA disclosures contain supplemental statements that provide more detail about the specific work performed on behalf of foreign agents and governments, as well as the money spent. For example, Targeted Victory's filings identify their work as: "Targeted Victory on behalf of Qorvis provided digital strategy and content promotion, namely, social media promotion, optimization, reporting and analytics for the Royal Embassy of the Kingdom of Saudi Arabia." The supplemental statements also show the amount paid, through Targeted Victory on behalf of Saudi Arabia, to various vendors, media providers, digital analytics services, and various websites and platforms, including YouTube, Google, Facebook, and Twitter – totaling \$353,179.

Our examination of the FARA filings suggest that the bulk of the work Targeted Victory did for Saudi Arabia focused on a Twitter account, @ArabiaNow. The account was created on February 17, 2015, currently has more than 48,500 followers, and is a verified user. Via Twitter's API, we downloaded and examined the 1,174 tweets sent by the account when Targeted Victory was managing it. According to the metadata, all the tweets were sent from Washington, D.C.

Though the account's following is significant, the tweets don't have notable engagement. The tweet with the most favorites has 572, while the most re-tweets was 405. On occasion, the account retweeted or quote-tweeted other accounts, but the majority of the tweets stemmed from the account itself.

We also examined the content of the tweets. Most notably, nearly 90% of the tweets contain a link, of which the vast majority were to a website of the same name, ArabiaNow.org. According to the site⁴, "Arabia Now is an online hub by the Royal Embassy of Saudi Arabia in Washington, D.C., for news related to the Kingdom. Here you'll find recent headlines from around the world on business, culture and government related to Saudi Arabia." The site publishes non-bylined "stories" of coverage favorable to the kingdom.

An analysis of the tweets reveal that they fall into a few major categories. First, there are cultural public relations tweets – about tourist activity, Saudi designers or artists, and new attractions. Technology-related tweets were another public relations effort. These include touting energy efficiency efforts in the country, research from the country, and Crown Prince Mohammad bin Salman's trip to the U.S., which included visits to MIT and Harvard. A significant portion of tweets, and the stories to which they linked, worked to counter the human rights record of the country. These focused in particular on advancements of women in the country, as well as treatment of refugees, services for "orphans" and refugees, and other goodwill projects. Another category includes tweets, and stories, about safety. These include statements about the security of the country, claims of military victories in Yemen, arrests related to foiled extremist plots, and general condemnation of terrorist attacks worldwide. Finally, tweets touted

⁴ <http://www.arabianow.org/about-arabia-now/>

the relationship with the U.S. and U.S. officials, visits between the two, and business investments in Saudi Arabia from U.S. companies.

Using MediaCloud, we searched for mentions of the account in news stories. We found four stories that referenced the account, but none quoted or embedded a tweet as a source. Rather, all of the stories mentioned the account as part of a broader focus on the myriad of ways the Saudi government attempts to influence the U.S. public, journalists, and lawmakers.

Though there were no filings for other firms, we did look to other firms' websites to see if they touted work for foreign clients. Blue State Digital did work on behalf of The Labour Party in the United Kingdom⁵. Precision Strategies worked for Prime Minister Justin Trudeau's Liberal Party of Canada during the October 2015 parliamentary election⁶. 270 Strategies touts its work on a "number of international electoral efforts" and provides a case study on Canada's The Broadbent Institute⁷. On the Republican side, Harris Media showcases their work for Benjamin Netanyahu campaign for Prime Minister in Israel in 2015⁸. It is unclear if this sort of work should require FARA filings as well, though it is certainly a possibility.

Foreign propaganda on social media

The FARA-related data made available to us by the FBI contained information about all active filings in June and July 2018 that mentioned any social media platform. An FBI researcher downloaded all supplemental statements for active FARA registrants in the summer of 2018. The

⁵ <https://tools.bluestatedigital.com/clients>

⁶ <https://www.precisionstrategies.com/case-studies/liberal-party-canada/>

⁷ <https://270strategies.com/case-studies/broadbent/>

⁸ <https://www.harrismediallc.com/client/>

researcher then manually examined each document for mentions of social media platforms or specific accounts. This information was used to create a database of registrants, the foreign entities for which they worked, the social media handles (as disclosed), and links to the supplemental forms on the DoJ website. U.S. firms engaged in public relations efforts on Twitter and Facebook on behalf of dozens of foreign governments and actors including: China, Qatar, United Arab Emirates, Sudan, Syria, Palestine, Iran, Iraq, Czech Republic, Saudi Arabia, Chile, Switzerland, Peru, The Netherlands, the United Kingdom, Spain, Italy, and more. Based on an examination of FARA disclosure documents and further information collected by the FBI, we were able to identify 56 Facebook pages and 53 Twitter accounts developed and/or maintained by U.S. firms.

Our initial examination of these efforts reveals many accounts – and associated posts – that promote general interest in and tourism in their affiliated country. For this study, we narrowed our focus to six countries, with available data and FARA disclosures, that are – at this moment in time – particularly politically interesting. These countries or entities are: the United Arab Emirates (UAE), Iran, Iraq, Palestine, and Qatar.

MSLGROUP Americas, Inc. for Saudi Arabia. The work done by Targeted Victory, described above, was done on behalf of MSLGroup Americas, which merged with Qorvis. FARA filings reveal the firm performed, contracted out, and oversaw work done on behalf of the Embassy of Saudi Arabia from 2002 to 2017. MSL/Qorvis is a large public relations firm – the work they do is not explicitly political, and they represent a host of multi-national companies and non-profits.

The FARA filing we examined, provided to us from the FBI, reveals a host of work done for Saudi Arabia from October 1, 2017 through March 21, 2018. On top of standard PR work like

distributing news releases and facilitating media requests for Saudi officials, the firm lists a host of digital work. MSL/Qorvis work includes, “developed content for embassy social media accounts, developed content for the Yemen Comprehensive Humanitarian Operations (YHCO) social media accounts, managed the ArabiaNow website, launched and managed the YemenPlan.org website, placed digital advertising regarding policy matters potentially affecting the interests of the Kingdom of Saudi Arabia, and conducted research to gauge U.S. public opinion on Saudi regional issues and official visits.” The filing lists a series of expenditures related to digital advertising including \$10,000 to Twitter, \$10,000 to Outbrain, \$27,987 to Taboola, and \$41,250 to Zignal Labs, both for “digital support,” as well as \$25,079 to Klip Media Group and \$719 to Scott Aikin, both for “digital production.” None of these vendors filed their own FARA disclosures for the work they did, as sub-contracted by MSL/Qorvis for Saudi Arabia. A review of other FARA filings from MSL/Qorvis on their Saudi work shows they also used Taboola and Sharethrough, which like Outbrain, are all programmatic native ad companies. It appears this is a preferred ad tactic for them. This allows for stories about Saudi Arabia, likely culled from the Arabia Now website, to appear on news sites without having to get the news sites themselves to run them. We can only speculate about the content of these efforts, since this communication content is not disclosed.

MSL Group filed plenty of copies of their communications with the Justice Department, from press releases to screenshots of their websites to copies of lengthy reports on the country’s counter-terrorism activities. However, nowhere in these supplemental files did they include screenshots from Twitter, Sharethrough, Outbrain, or Taboola. While the typical public relations work they did was accounted for, the digital media buying was not.

The FARA disclosure forms do reveal the actual URLs for the various social media accounts run by MSL/Qorvis for Saudi Arabia. They include a Facebook page, a Twitter account, and a YouTube Channel for YCHO, and the Twitter account for ArabiaNow (run by Targeted Victory through early 2017, as discussed earlier). The Facebook page is no longer active. The Twitter account for YCHO has 13,400 followers and was started in January 2018. Tweets are in a mixture of English and Arabic, often sharing the same tweet in both languages. Tweets often feature infographics touting the “Saudi-led coalition to reduce the gap in humanitarian aid as identified by the United Nations⁹.” The account also shares pictures of the aid being delivered, as well as official statements, press releases, and media appearances by Saudi figures. The tweets often relay charges of “criminal behavior” and “war crimes” against Houthi leaders in Yemen. All of this can best be seen as propaganda to combat the negative view of the Saudi-led (and financed) attacks in Yemen, as part of a proxy war with Iran in the country. Saudi-backed forces have been attacking Hudaydah, an entry point for global aid to Yemen, which could exacerbate the humanitarian catastrophe in the country¹⁰. A search of the Twitter ad archive does not show any promoted tweets “in the last seven days” – older archived ads are not available since, again, the account is not deemed political. A search of MediaCloud does not reveal @YCHOoperations tweets as featured in news stories. The YouTube accounts hosts only four videos, all with less than a few dozen views.

SAPRAC, Inc. and Craft Media Digital for the Kingdom of Bahrain. SAPRAC, Inc. (Saudi American Public Relation Affairs Committee) is a communications agency whose sole purpose is

⁹ <https://yemenplan.org/>

¹⁰ <https://www.bbc.com/news/world-middle-east-44466574>

Saudi / U.S. relations. According to their website, “Our in-house capabilities include industry-leading media relations, crisis communications, digital strategy and advertising, social media, coalition management, art and design, website development, and video production¹¹. We have strategic partnerships to provide public opinion research, grassroots mobilization and field programs, and influencer engagement.” The website does *not* contain the required FARA disclosure disclaimer.

The FARA filing we examined details work for done the Embassy of the Kingdom of Bahrain, as well as for Salman Al-Ansari, who is the founder of SAPRAC. “SAPRAC continues to serve as a general platform for Salman AI-Ansari to disseminate information and express views on US-Middle Eastern affairs,” as reported on the FARA filing. This filing also discloses that in October 2018, SAPRAC conducted an advertising campaign, on behalf of Bahrain, to “educate the public about the relationship between Qatar and North Korea.” To this effort, Bahrain budgeted \$1.2 million. The FARA supplemental form discloses that SAPRAC sub-contracted Craft Media Digital for a total of \$1.1 million -- \$921,000 for “ad placements, fees, costs,” \$20,000 for “video editing,” and \$182,000 for “ad production and placement.” The bulk of these efforts appear to have been aimed at creating a website – TheQatarInsider.com – as well as similarly named Twitter, Facebook, and YouTube accounts. The Facebook page and the YouTube channel no longer exist. The Twitter account - @theqatarinsider – was established in June 2017 and has 16,900 followers. SAPRAC’s supplemental filings contain copies of paid tweets and Facebook posts, of which many include explicit fear-based appeals including “Qatar cannot be trusted.” In addition to tying Qatar to North Korea and terrorism, these paid ads also

¹¹ <https://www.saprac.org/>

include messaging on the 2022 World Cup, including that “Qatar corruptly beat out the U.S. to host the 2022 World Cup” and “Why is Qatar seeking North Korean forced labor to build its 2022 World Cup Infrastructure?” Again, no promoted tweets from the account appear in the Twitter ad archive, since the account is deemed non-political.

Craft Media Digital, has their own FARA filings that we assume are related to this work. Craft was founded by Brian Donahue, previously the National 72-Hour Director at the Republican National Committee, and sells itself on a wide range of services, from crisis communication to social media management to video media production. Craft’s work includes political work such as advocacy on ballot initiatives as well as work such as website development for commercial clients. On October 30, 2018 Craft filed a FARA supplemental statement, but it returns a 404 on the Department of Justice FARA search website. Craft also filed an amended FARA supplemental statement on July 1, 2019, which describes the activities as: “The advertising that Registrant is tasked with helping to develop, and to place in selected media outlets and platforms, primarily involves issues relating to the activities of the emirate of the State of Qatar to which the Kingdom of Bahrain is opposed, specifically its alleged support for terrorists and terrorist activities. The Embassy of Bahrain wishes to raise awareness among foreign policy influences in the United States of Bahrain's concerns in this regard. All activities of Registrant will be confined to advertising development, editing, placement in print, web, and social media of the product on behalf of the foreign principal, and monitoring of response/ engagement rates to such advertising¹².” The same filing also reveals ad and content placement in: The Washington Post, the Wall Street Journal, the New York Times and New York Times

¹² <https://efile.fara.gov/docs/6463-Exhibit-AB-20190701-2.pdf>

Digital, The Hill, Politico, Google, Twitter, and Facebook. An attachment to this filing shows several payments, made by Craft of behalf of SAPRAC and Bahrain, to the listed placements, but none have financial amounts attached.¹³ Nor does this filing list any other social media accounts or the content of the ads created and placed. A search on MediaCloud does reveal that any @theqatarinsider tweets were used in news stories.

Podesta Group for Saudi Arabia. The Podesta Group did work for, and filed FARA disclosures, related to work for the Hong Kong Trade Development Council, the Embassy of Japan, the Embassy of the Republic of India, the Embassy of the Republic of Azerbaijan, the Center for Studies and Media Affairs at the Saudi Royal Court, Democratic Party of Moldova, the Republic of Iraq, and, as we focus on here, “Salman Al-Ansari, through [the] Saudi American Public Relations Affairs Committee.” This work is, of course, related to the SAPRAC and Craft Media Digital work described above, and came with, as reported, a budget of more than \$2.7 million to “distribute informational materials through various advertising, social media, online and digital platforms...” Like the SAPRAC and Craft Media Digital filings, the Podesta Group filings list the Qatar Insider website, as well as related Twitter and Facebook accounts. Included in the Podesta Group’s supplemental files of copies of the communications they distributed are Facebook posts and tweets. The content of these social media messages is similar to those from Targeted Victory and SAPRAC: the messages focus on Qatar’s connections to terrorist groups and North Korea and promote third party news coverage from sources like CNN. The Podesta Group’s filings also include Facebook posts and tweets with images, quotes, and videos of President Trump

¹³ <https://efile.fara.gov/docs/6463-Amendment-20190701-1.pdf>

It should be noted that the Podesta Group, which shut down after being pulled into the Mueller investigation, also touts work, on archived versions of their web site, for companies and a high-profile business man in the Democratic Republic of Congo and the Iraqi Embassy. Neither of these are listed in FARA filings. The work for the Iraqi Embassy included Facebook and Twitter initiatives—if they used promoted posts or tweets is unknown. In terms of social media strategy, The Podesta Group developed a list of 200 “key foreign policy elite” Twitter users and had the Iraqi ambassador’s newly verified Twitter account re-tweet and engage with them prior to running a “Twitter chat” in which the Ambassador’s account answered questions tweeted at him. The campaign was considered successful, gaining a write-up on Twitter’s blog and reportedly reaching 2.6 million people, as well as generating questions, retweets, and direct engagements from reporters for Bloomberg News, Al Jazeera, NBC News, Huffington Post, Salon, McClatchy, and the New York Times “Deal Book” (“Generating US Goodwill Online for a Key US Ally”, April 2016).

SCL Limited for UAE. SCL Social Limited’s FARA filing from May 31, 2018 covers work for the United Arab Emirates (UAE) from October 6, 2017 through April 30, 2018 (SCL ceased operations and filed for bankruptcy shortly thereafter). SCL Social Limited was formerly Cambridge Analytica, which became notorious for their work for the Leave campaign during Brexit and Ted Cruz’s and Donald Trump’s 2016 presidential bids, all of which supposedly relied on psychographic profiles for targeting, based on misused Facebook data. According to their FARA filings, SCL developed and executed a “global social media campaign” that was particularly focused on the 72nd regular session of the UN assembly meeting in New York City. For these efforts, they brought in \$650,000. The supplemental statement also shows that SCL

spent \$64,526 on various ad buys on Facebook, Google’s AdWords, YouTube, Outbrain, and Twitter. In particular, SCL spent \$13,386 on Facebook ad buys and \$24,630 on Twitter promoted content.

The Facebook page maintained for these efforts is Boycott Qatar, which was created on September 19, 2017. The page has only four posts, all posted during the UN Assembly meeting. The engagement is low, with only 130 people “liking” the page and 133 “followers.” Because of the FARA filings, we know ads were placed – but the Facebook Ad Library contains no ads for this campaign, since it happened before May 2018, when the archive was started. The informational materials filed with FARA include six screenshots of Facebook ads focusing on discrediting Al Jazeera and linked Qatar to terrorist operations and North Korea¹⁴. Of the four organic posts that still appear on the page, all disparage Qatar. One links to a video titled “Qatar and North Korea: Partners in Terror?” that is hosted on the QatariInsider website, but the website and video link are now dead. Two others are links to news sites whose headlines tease links between Qatar and terrorism funding.

Though the URL is cut off on the actual FARA filing, we did find the Twitter account run by SCL for the UAE as part of this work: @BoycottQatarNow. Like the Facebook page, the account was created in September 2017. It follows no one and has 1,216 followers. The page shows one tweet – a link to an op-ed by an Egyptian journalist Abdel Latif El-Menawy in The Independent, which was also linked on the Facebook page. The informational materials filed with FARA include five screenshots of Twitter ads. More than \$24,000 was spent on these Twitter ads. No ads appear in the Twitter ad archive, which was also launched in 2018.

¹⁴ Interestingly, the paid ads discredit Al Jazeera, but the organic posts don’t target the news organization.

Because these ads appeared before Google, Facebook, and Twitter launched their respective ad archives in 2018, we cannot verify that these are the only ads run as part of the campaign. According to the disclosure, the ads targeted to “NGO’s, foreign diplomats, and certain reporters in New York City” during the UN Assembly meeting in 2017. A search of MediaCloud doesn’t show that any tweets from @BoycottQatarNow appeared in news stories, but we, of course, lack information from SCL or Twitter about which journalists were targeted with the campaign.

Audience Partners Worldwide, LLC for Qatar. Our analysis reveals several U.S. firms working for countries aligned against Qatar. In contrast, Audience Partners Worldwide, LLC. (now called A4) filed FARA disclosures revealing their work on behalf of Qatar. Specifically, according to the filing, “Registrant provided advertising services as a subcontractor to Information Management Services, Inc. for the benefit of the Government Communications Office of the State of Qatar.” The FARA supplemental statement, filed on March 2, 2018, covers the six-month period preceding January 31, 2018. The statement lists \$567,580 worth of disbursements, including \$2,122 to Blue 262 Creative LLC, who did not file a FARA disclosure. The ads created appear to have run directly on The Hill, Roll Call, Politico, Twitter, and The Washington Post, based on payments listed on Audience Partner’s FARA supplemental statement. The statement also lists \$407,000 for digital ad placement on Google (\$117,885), Twitter (\$35,586), Facebook (\$40,092), and Turn (\$207,781), for programmatic ads.

Audience Partners filed copies of communications with the Justice Department that show two Twitter ads were promoted from @QatarEmbassyUSA and two from @Am_AlThani. Only two Facebook posts from the Embassy of the State of Qatar were included—neither are clearly

marked as “Sponsored” so it is unclear if the Facebook payments went to page management or actual paid promotions on the platform. Both of these posts direct users to *Washington Post* articles.

The final page of Audience Partner’s supplemental filing includes text ads promoting positive stories about Qatar from The Hill, Reuters, and other news outlets. Where these ads ran is not clear—while they could be Google search ads, they could also be text-based native ads run through Google Ads or Turn, Inc. Notably, these screenshots of the text ads do not make it clear that the story is being promoted by anyone other than the publisher of the story.

National Council of Resistance of Iran - U.S. Representative Office (NCRI-US). Unlike the SCL Limited FARA filing, the filing for NCRI on behalf of Iran contains even less pertinent information. The NCRI is a group of exiles from Iran who aim to replace the current government. Their website states, “The NCRI acts as the parliament-in-exile with some 500 members (half of them women), including representatives of ethnic and religious minorities such as the Kurds, Baluchis, Armenians, Jews, and Zoroastrians. Founded in 1981 in Tehran, NCRI aims to establish a democratic and non-nuclear republic in Iran, based on the separation of religion and state.” They work to disseminate information to the U.S. government and politicians, academics, universities, and the general U.S. public.

During this particular filing period, a Twitter account and a Facebook page are both listed on the supplemental statement. Various expenditures are listed including \$13,604 for “independent contractors” that are not described or listed further and \$2,048 for “press releases/media” which might include content promotion on social media, but it is unclear. There are

several pages of disclosures of media contact that reveal NCRI targets and engagement mostly with media outlets and pundits on the right.

We examined the posts on the NCRI-US Facebook page for the six months covered by the FARA filing: December 2017 through May 2018. The page was created in 2013 and has about 800 followers and people who “like” the page. The period starts with several posts about a panel put on by NCRI, hosted at The National Press Club, about human rights in Iran. Throughout, the Facebook page is used to promote and then share various briefings sponsored by CNRI. There’s a fair amount of promoting and linking to self-published books: “Iran: Where Mass Murderers Rule” and “Iran’s Ballistic Buildup: The March Toward Nuclear-Capable Missiles.” In January of 2018, anti-government protestors took to the streets in Iran, and the NCRI page shared many links to news coverage of the protests and crackdowns by the Iranian government. New posts were shared throughout the period we examined, frequently from right-wing outlets like FoxNews, The Washington Times, and The Daily Caller. The page is also used to promote statements on the NCRI website, including a “Iran Weekly Roundup” that featured news critical of the regime. The page also semi-regularly features a “quote of the week” post, many of which were by and in praise of President Trump, members of his cabinet, and other political figures on the right, such as Newt Gingrich. We found one ad in the Facebook ad archive, which ran without a disclaimer, and was seen by less than 1,000 people, though the majority were teenagers. While the NCRI filed copies of its communications such as press releases, no social media posts or ads were included in its filings.

NCRI was much more active on Twitter, with over 400 tweets during the same six-month time period. The Twitter account @NCRIUS was created in December 2012, currently has more

than 12,000 followers, and is a verified account. The Twitter account mostly mirrors the Facebook page in terms of content, though many more stories are shared and events are live-tweeted, as opposed to streamed or share via video on Facebook. Many tweets openly call for regime change and urge an overthrow of the current Iranian government. Likely due to the greater following, engagement was greater on Twitter, with some tweets getting as many as 200 favorites or retweets, but these come with a long tail of small engagement. There are no ads housed in the Twitter ad archive for this clearly political account.

Nineveh Plain Defense Fund for Iraq. The Nineveh Plain Defense Fund for Iraq is the U.S. arm of the Iraqi efforts to defeat ISIS and is a registered group that lobbies the U.S. government, builds awareness, and attempts to raise money towards things like the purchases of uniforms and facilities improvements. Money is raised through their web site and through their social media. The group is affiliated with the Assyrian Democratic Movement, which advocates for Christians in Iraq and has thus far rejected elections there as illegitimate. FARA filings reveal little about the activity of this group on digital or social media. The filing we examined states, “Fund-raising for the Nineveh Plain Protection Units continues. Our website serves as the primary fund-raising vehicle. No specific fund-raising events were held during this reporting period.” The filing provides no information on monies spent on postings on social media or to promote the website more broadly, though the website did bring in \$29,774 in donations during the time period.

The fund does maintain a Facebook page, which it discloses in the FARA supplemental statement. The page was created in May of 2016, and has about 3,000 likes and follows. Posts on the page appeal for donations, which link to the fund’s website. Many posts also tout the activities of the unit in Iraq, with a specific focus on equipment and funds sent to the unit, as a

result of fundraising. In general, the page isn't very active. There are no ads from this page in the Facebook Ad Archive. The Niveah Plain Defense Fund for Iraq filed copies of Facebook posts, each time it made one. Based on the images submitted, it appears none of them were paid posts, as there was no "sponsored" label on them.

General Delegation of the PLO to the US for Palestine. The General Delegation of the PLO acted as the official representative office of the PLO in the United States, but was closed in September 2018 by President Trump. According to FARA filings, the office "coordinates events for the community, pursues Public Diplomacy in the US, and interacts with members of the US Government, NGOs, and civil society to inform and educate on Palestinian issues." The website and the Facebook page disclosed on the FARA filing we examined are no longer operational, but the Twitter account @PalestineUSA remains active (though it has not sent any tweets since September, 2018 when the delegation's office was forced to close). The Twitter account, started in June 2011, has 8,316 followers and is verified.

We examined the content of the tweets for the nine-month period preceding the closure, which is also covered by the FARA filings we reviewed. The account shared four categories of tweets. One often tweeted type of content was news from Palestine – happenings and achievements *not* related to the occupation and conflict with Israel. A second category were tweets announcing and linking to official statements from leaders. These directed to the website, which is no longer live. Tweets also often live-tweeted speeches from Palestinian leaders or prominent members or supporters of the community. Finally, a common category of tweets was reporting on violence, notably in the Gaza strip or disputed settlement areas. These frequently highlighted the deaths of sympathetic figures like children, members of the press, or medical

workers. Nearly 75% of the tweets contained a URL. Many linked to the now defunct PLOdelegation.org, but news sites were also common.

The FARA filing does not list expenditures that relate to digital or social media services. Because the Facebook page is no longer live, it is not-searchable in the ad archive. A search of the Twitter ad archive does not show any promoted content in the last seven days, obviously. Again, because the account is not deemed “political” promoted content beyond the seven-day window is not accessible. The PLO did not file any copies of social media posts with the Justice Department. A search of MediaCloud reveals no news stories that mention the @PalestineUSA account.

Discussion: The Current Limitations of FARA Disclosures

As this paper has detailed, agents acting on behalf of foreign principals use a range of different strategies on social media and digital media more broadly. This includes U.S.-based firms’ creation of websites and associated social media accounts, such as “Qatar Insider,” which deliver messages that are not explicitly linked to the country of origin. These firms also promote legitimate news coverage sympathetic to the issues the sponsoring country cares about through organic and paid social media posts and native digital advertising, that are not always clear as to its origins. This also includes geotargeting social media advertising to locations of events at which the foreign principal’s desired audience will be in attendance. Firms also target organic messages to journalists and other elites on social media, including Twitter. While we do not have targeting information available for promoted posts (see below), these potentially are targeted to people with journalism-related job titles and interests on Facebook. How these strategies are received by their intended audiences, how effective they are in gaining additional news coverage

or changing opinions, and how often they may be used by other foreign principals are all areas for future research.

Institutionally, we want to note that there are a number of existing proposals designed to improve FARA. In addition to the enforcement solutions proposed by the Government Accountability Office, Strauss (2015) of the Congressional Research Service proposed the potential solution of combining the administration and enforcement of the Foreign Agent Registration Act with the Lobbying Disclosure Act, which governs domestic lobbying activities. Multiple competing and complementary bills with amendments to FARA have been proposed in the Senate by Senators Grassley, Feinstein, Shaheen, Young, and Johnson with the goals of increasing enforcement and compliance (Gangitano, 2019). Senator's Grassley's latest bill co-sponsored by both Democrats and Republicans focuses on increasing penalties for failure to register and asking the Government Accountability Office to look into how other lobbying laws may be being used to avoid filing under FARA (ibid). Senators Shaheen and Young have introduced bills to increase the Justice Department's ability to more effectively investigate violations and update the disclosure and labeling requirements (ibid; "Americans Deserve Media Transparency Not Propaganda," 2017). And while historically, FARA enforcement has not been important to the Department of Justice, the Assistant Attorney General for the National Security Division recently confirmed it is a priority (Kelner, 2019).

That said, we focus here on the limitations in the data that we discovered through our attempts to analyze this work.

To start, the platform data is incomplete. Our dataset from Twitter only includes organic tweets that were not deleted (per the terms of Twitter's API). This misses a significant category

of promoted tweets. For example, according to FARA filings, Targeted Victory directed \$142,406 to Twitter for paid content promotion over their period of work for Saudi Arabia. The tweets that Targeted Victory submitted to FARA are screenshots placed into a PDF, making comparing to two sets cumbersome. Even more, although the content of almost all tweets might rationally be deemed “political,” none of them appear in the Twitter Ad Archive, at least not past the seven-day mark – tweets promoted more than seven days ago are not accessible in the Twitter Ad Archive unless they are from a “defined political actor.” It’s unclear how Twitter defines users as such, since clearly many of the accounts we analyzed are explicitly political actors – such as the Embassy of Saudi Arabia. In fact, one political consultant from the right privately told us that their firm has begun storing their own archive of Twitter ads, collected through BrandWatch, because they are so dissatisfied with Twitter’s own archive. As a clear recommendation, platform companies should treat many more of these accounts as “political” so that digital ads are archived more than seven days. We believe that if a foreign government or entity is promoting content explicitly in the U.S., then it is worthy of the same transparency required of U.S. political campaigns and organizations – both of whom seek to influence policy makers, journalists, and public opinion. At the same time, if the tech platforms purport to be worried about foreign propaganda in the U.S., they should, at a bare minimum, require labeling and archiving of *known* foreign-funded strategic communications on their sites. Even more, some of the work of the firms we analyzed clearly falls into the category of mis- and dis-information, which platforms such as Facebook and Google have clear policies against.

FARA data can also be considerably improved. We have a number of recommendations based on this research. First, promoted social media content should be part of the digital archive

through the FARA supplemental filing. This might freeze things like engagement numbers at a moment in time (as compared with what is available about impressions for what Twitter deems is a political account), but the tradeoff would be worth it. At the moment, there are scanned-in screen shots of promoted tweets (turned in as part of the FARA disclosure) that provide more information about the work done on behalf of a foreign agent than the tech companies themselves reveal in their insufficient archives.

Second, another limitation in the current FARA data is that it is impossible to tell if tweets were promoted or just tweeted – or when tweets were promotion only. This limits research analysis and public transparency more generally, and it is something that should be disclosed. In addition, there is a substantive difference between organic and paid social media posts as pertains to achieving transparency into who is attempting to influence public opinion and policy in the United States *and how*. Messages a foreign principal pays to promote are the ones they are most invested in or believe are the most important to distribute. Knowing the difference between organic and promoted social media posts is paramount to understanding the strategies and goals of a foreign principal. In addition, reach and engagement metrics with limited visibility into payment for those metrics is misleading—one may think a message resonated with a U.S. audience when in fact those engagements and retweets could be paid for, potentially from a foreign audience.

Third, registrants should also be held to the requirement that they actually submit the URLs for the social media account(s) they are running. Only about two-thirds of the filings we examined revealed the URLs or account names for the social media pages run by U.S. firms for foreign principals. Although we found limited mentions of social media accounts disclosed in

FARA filings in the U.S. news stories, it's of course important to note that many filings mention targeting journalists specifically. In the first author's research, journalists not only rely on Twitter to report public opinion (which could be influenced by social and digital efforts), they also use Twitter to determine what is newsworthy. As such, under existing FARA disclosures there are few ways to understand how these strategic communication efforts might "seep in" to U.S. journalism, such as through retweets that bring content in U.S. journalists' timelines, which then may color their understanding of issues. For example, the Podesta Group used its ability to engage journalists in conversations of its own making to promote its services.

Fourth, and related, there are a number of recommendations we have for more effective FARA enforcement. Regarding the informational materials, digital archiving should go beyond scanned-in screenshots to include actual digital files with the content itself – this is especially important for videos. There is also inconsistent data information on digital materials – they should all be labeled with the platforms and/or sites upon which they appeared. We recognize that the latter is difficult. While listing specific publisher sites that ads ran on is effective when those media buys were made direct with the publisher, this method of transparency is neither feasible nor particularly meaningful when applied to programmatic media buying. Programmatic ads are often bought often without significant concern for the content they are placed in, instead these ads are placed based on audience attributes. Programmatically purchased ads should be reported with respect to the audiences they were targeted to and the data used to create those audiences. The same is true for Facebook and Twitter—disclosing that ads were purchased on these websites fails to reach the implicit level of transparency achieved from disclosing traditional media purchases. As such, audience targeting data is necessary. We believe that under

the current FARA regulations, targeting information could be required. For media contacts, FARA registrants now provide detailed information about who, at which media organizations, they contacted. Similar information should be required of digital and social media advertisements as well. Especially as several filings reveal that these firms attempt to target policy makers and journalists, more specific information is needed.

In sum, the materials themselves, on top of being cumbersome to find, reveal very little about the actual scope of work on behalf of a foreign agent without platform and targeting information. In addition, some practical accounting would be helpful. How many ads were placed? Over what time period? None of this information is apparent in the informational materials filings, save counting the individual screen-shots and scanned-in digital ads. On top of that, more financial accounting is needed to understand the scope of these strategic campaigns. For example, video content is often unavailable, even when the registrant attempts to make it available through Google Drive or YouTube links, as was the case with SCL. No social media or digital filings include information on reach or targeting. The disclaimers required by FARA that state who the foreign principal is and where to find more information were only included by four (under half) of the relevant registrants on their digital ads such as banners, and only by one of the relevant registrants on their social media ads. Finally, there are duplicates on filings. It is good that multiple firms file for the same work (e.g. SAPRAC, Craft Media Digital, and Podesta Group on Qatar Insider work) *but* what is the different work that each firm did? As FARA disclosure it is set up now, it is unclear.

Our attempt to examine the work that U.S. public relations firms and digital consultancies do across social and digital platforms for foreign principals revealed little about the work itself but

much about the inconsistencies and inadequacies in the process as is. Technology firms' ad archives, inspired by the foreign interference in U.S. elections, fail at their own mission by not including paid content from known foreign entities. The requirements for and enforcement of existing FARA disclosures needs to be updated for the digital media landscape. With this improved data from both tech firms and the DoJ, future work can meaningfully examine the content of foreign efforts to influence various U.S. publics, as well as how those messages are received by their intended audiences, and to what extent they are amplified in the press.

Works Cited

- #AskIraq: Diplomacy on Twitter. (2013). Retrieved from https://blog.twitter.com/en_us/a/2013/askiraq-diplomacy-on-twitter.html
- Ainsley, J., Lehren, A., & Schechter, A. (2018, January 18). The Mueller effect: Foreign lobbyists wary of indictment rush to register. Retrieved June 26, 2019, from NBC News website: <https://www.nbcnews.com/news/us-news/mueller-effect-fara-filings-soar-shadow-manafort-flynn-probes-n838571>
- Albritton, R. B., & Manheim, J. B. (1983). News of Rhodesia: The Impact of a Public Relations Campaign. *Journalism Quarterly*, 60(4), 622–628. <https://doi.org/10.1177/107769908306000406>
- Al-Yasin, Y., & Dashti, A. A. (2009). Foreign Countries and U.S. Public Relations Firms: The Case of Three Persian Gulf States. *Journal of Promotion Management*, 14(3–4), 355–374. <https://doi.org/10.1080/10496490802637713>
- Atieh, J. (2009). Foreign Agents: Updating FARA to Protect American Democracy. *University of Pennsylvania Journal of International Law*, 31, 1051–1088.
- Assessing Russian Activities and Intentions in Recent US Elections. (2017). Retrieved August 15, 2019, from https://www.dni.gov/files/documents/ICA_2017_01.pdf
- Audit of the National Security Division's Enforcement and Administration of the Foreign Agents Registration Act. (2016). Retrieved from <https://oig.justice.gov/reports/2016/a1624.pdf>
- Conahan, F.C. (1990). FOREIGN AGENT REGISTRATION: Justice Needs to Improve Program Administration. Retrieved from: <https://www.gao.gov/products/142192>
- Ettinger, K. E. (1946). Foreign Propaganda in America. *Public Opinion Quarterly*, 14.

- Fasick, J. K. (1980). Administration of Foreign Agent Registration. Retrieved from: <https://www.gao.gov/products/112952>
- General FARA Frequently Asked Questions. (2017, August 21). Retrieved August 1, 2019, from <https://www.justice.gov/nsd-fara/general-fara-frequently-asked-questions>
- “Generating US Goodwill Online for a Key US Ally. (2016, April). Retrieved August 21st from <https://web.archive.org/web/20160402050409/http://www.podesta.com/record/generating-us-goodwill-online-key-us-ally>
- Government Accountability Office. (1974). Effectiveness of the Foreign Agents Registration Act of 1938, as Amended, and Its Administration by the Department of Justice. Retrieved from: <https://www.gao.gov/products/B-177551>
- Jamieson, K. H. (2018). *Cyberwar: How Russian Hackers and Trolls Helped Elect a President What We Don't, Can't, and Do Know*. Oxford University Press.
- Johnson, M. A. (2005). Five decades of Mexican public relations in the United States: From propaganda to strategic counsel. *Public Relations Review*, 31(1), 11–20. <https://doi.org/10.1016/j.pubrev.2004.11.002>
- Kelner, R. (2019, March 10). U.S. Department of Justice Announces Foreign Agents Registration Act Enforcement Initiative. Retrieved July 25, 2019, from Inside Political Law website: <https://www.insidepoliticallaw.com/2019/03/10/u-s-department-of-justice-announces-foreign-agents-registration-act-enforcement-initiative/>
- Kim, Y. M., Hsu, J., Neiman, D., Kou, C., Bankston, L., Kim, S. Y., ... Raskutti, G. (2018). The Stealth Media? Groups and Targets behind Divisive Issue Campaigns on Facebook.

- Political Communication*, 35(4), 515–541. <https://doi.org/10.1080/10584609.2018.1476425>
- Lee, S. (2006). An analysis of other countries' international public relations in the U.S. *Public Relations Review*, 32(2), 97–103. <https://doi.org/10.1016/j.pubrev.2006.02.001>
- Lee, S. (2007). International public relations as a predictor of prominence of US news coverage. *Public Relations Review*, 33(2), 158–165. <https://doi.org/10.1016/j.pubrev.2007.02.002>
- Lee, S., & Hong, H. (2012). International public relations' influence on media coverage and public perceptions of foreign countries. *Public Relations Review*, 38(3), 491–493. <https://doi.org/10.1016/j.pubrev.2012.03.007>
- Lee, S., & Yoon, Y. (2010). Return on investment (ROI) of international public relations: A country-level analysis. *Public Relations Review*, 36(1), 15–20. <https://doi.org/10.1016/j.pubrev.2009.08.011>
- Manheim, J. B. (1994). *Strategic Public Diplomacy and American Foreign Policy: The Evolution of Influence*. Oxford University Press.
- Manheim, J. B., & Albritton, R. B. (1987). Insurgent Violence versus Image Management: The Struggle for National Images in Southern Africa. *British Journal of Political Science*, 17(2), 201–218. Retrieved from JSTOR.
- Rojas, G. V. M. M., William Gawande, Kishore. (2007). *Can foreign lobbying enhance development? The case of tourism in the Caribbean*. <https://doi.org/10.1596/1813-9450-4275>
- Spak, M. I. (1989). America for Sale: When Well-Connected Former Federal Officials Peddle Their Influence to the Highest Foreign Bidder--A Statutory Analysis and Proposals for

Reform of the Foreign Agents Registration Act and the Ethics in Government Act.

Kentucky Law Journal, 78, 237–292.

Straus, J. R. (2015). *The Lobbying Disclosure Act at 20: Analysis and Issues for Congress*. 42.

Straus, J. R. (2019). *Foreign Agents Registration Act: An Overview*. 2.

Zhang, J. (2005). World system and its agents: Analysis of the registrants of Foreign Agent

Registration Act (FARA). *Public Relations Review*, 31(1), 47–54. <https://doi.org/10.1016/j.pubrev.2004.11.005>

Zhang, J., & Benoit, W. L. (2004). Message strategies of Saudi Arabia's image restoration

campaign after 9/11. *Public Relations Review*, 30(2), 161–167. <https://doi.org/10.1016/j.pubrev.2004.02.006>

Zhang, J., & Cameron, G. T. (2003). China's agenda building and image polishing in the US:

Assessing an international public relations campaign. *Public Relations Review*, 29(1), 13–28. [https://doi.org/10.1016/S0363-8111\(02\)00198-4](https://doi.org/10.1016/S0363-8111(02)00198-4)