

ALERT

RT Registers Under the Foreign Agents Registration Act in an Environment of Heightened DOJ Enforcement

November 15, 2017

On Monday, T&R Productions, LLC (T&R), a Washington, D.C.-based corporation that operates studios for RT, hires and pays all U.S.-based RT employees, and produces English-language programming for RT, registered as an agent of ANO TV-Novosti, the Russian government entity responsible for RT Network's global broadcasts. The U.S. Department of Justice (DOJ) has indicated that it is currently reviewing T&R's filing, which is already publicly available online here, for adequacy.

The Foreign Agents Registration Act (FARA) statute, enacted in 1938 and administered by the FARA Registration Unit of the Counterespionage Section in the National Security Division, requires that all persons acting as an "agent of a foreign principal" and who engage in certain covered activities must register with the DOJ, unless an exception applies. The statute defines a "foreign principal" to include not only foreign governments and foreign political parties, but also foreign persons and corporations. Moreover, the statute defines an "agent of a foreign principal" to include any person who has an agency relationship with the foreign entity and engages in public relations, image-making, or political activities for or on behalf of that foreign entity.

T&R's FARA filing comes after weeks of high-profile news stories regarding issues connected with the enforcement of the statute. Given the current climate of heightened DOJ enforcement of FARA, ensuring compliance with FARA's registration and reporting requirements has become even more important.

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Practice Areas

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