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ABSTRACT

In this study, we map the legal work seven U.S. digital consultancies and public relations firms undertook across social media and digital platforms of behalf of four foreign governments. We find these firms used a range of different strategies on social and digital media, very few of which featured legally required disclosures linking the content to their country of origin. Firms targeted journalists and other elites, but exactly how is not clear. Our most powerful findings regard what is absent. Our study reveals as much about the inconsistencies and inadequacies of the current FARA disclosure process and gaps in tech firms' ad archives as it does about the content and strategies of the messages themselves. We conclude with a series of recommendations for technology firms and the Department of Justice for enforcing FARA regulations as they relate to social and digital content.

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 (Kim et al., 2018; Lukito, 2020; Lukito et al., 2020). 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, 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 legal 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 activities.[2]"

The FARA filings that we analyze are from consultancies that are following the law. These firms may be the only digital consultancies working with foreign governments that should register as foreign agents, but there are likely others who are not filing. A Government Accountability Office report in 1980 identified 13 people and organizations who potentially should have filed but did not (Fasick, 1980). As will be discussed later, there are few FARA prosecutions to encourage compliance, but many reasons not to register as a foreign agent, including not to expose your firm to negative publicity. In this way, the lack of enforcement not only fails to punish those who break the law, but unintentionally leads to the sanctioning of those who follow the law.

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

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Table 1. FARA compliance in filings.

	Targeted Victory	MSL Group	SAPRAC, Inc.	Craft Media Digital	Podesta Group	SCL	Audience Partners Worldwide
Worked on behalf of	Saudi Arabia, Subcontracted by Qorvis	Saudi Arabia	Kingdom of Bahrain	Kingdom of Bahrain	Saudi Arabia	UAE	Qatar
Digital platforms used	YouTube, Google, Facebook, Twitter	Twitter, Outbrain, Taboola, Sharethrough	YouTube, Google, Facebook	Google, Facebook, Twitter	Facebook, Twitter	YouTube, Google, Facebook, Twitter, Outbrain, Adwords	Google, Facebook, Twitter, Turn
Filed copies of social media posts with DoJ	Yes	No	Yes	No	Yes	Yes, but video links no longer work	Yes
Includes FARA disclaimer on social media posts	No	N/A	Yes	N/A	No	No	No, but is included on Qatar Embassy official pages
Filed copies of other digital ads with the DoJ	No	No	Yes	N/A	Yes	Yes	Yes
Includes FARA disclaimer on digital ads	N/A	N/A	Yes	N/A	No	No	Sometimes an incomplete disclaimer is included

posts and native digital advertising, very few of which featured required disclosures linking the content to their country of origin (see Table 1). Firms also targeted journalists and other elites, but exactly how is not clear from the content of the filings. Our most powerful findings regard what is absent. This 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 passed so that both the U.S. government and the public would know what foreign countries are attempting to sway public opinion, influence policy, and shape laws (https://www.justice.gov/nsd-fara/frequently-asked-questions). "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). FARA requires advertising agencies and 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.[3]

FARA requires transparency into foreign influence attempts in the U.S. 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 inconsistently 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. Prior to 2016, the Department of Justice had brought only seven criminal FARA cases since 1966.[4] After the 2016 election, the use of the law surged with the Department of Justice using FARA in a dozen cases.[5] 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, 2015).

The Government Accountability Office (GAO) has periodically documented the issues in compliance and enforcement. A 1974 GAO study found that 70% of registrations "were incomplete or lacked sufficient detail" and that the Department of Justice "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 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.[6] Legal scholars have also raised concerns, 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).

Russian interference in the 2016 U.S. presidential election sparked media, Department of Justice, and congressional interest in updating and properly enforcing FARA. After FARA was used in the indictments against former President Trump's associates Paul Manafort and Michael Flynn, registrations increased significantly: first time filings rose 50% between 2016 and 2017 and supplemental statements from existing registrants doubled.[7] Since 2016, foreign influence operations conducted by Russia, China and Iran have continued to operate in the United States and details of how Russia interfered in the 2016 U.S. election continue to surface. Broadly, these campaigns seek not only to gather sensitive government and personal information and recruit agents, but also exacerbate existing racial tensions, sow division, and ultimately weaken the United States' national unity and international reputation (Bradshaw & Howard, 2018; Kreps, 2020). Such influence campaigns are in addition to the public relations and political lobbying campaigns that countries routinely employ to improve their reputation among legislators and the American public. In theory, FARA should be able to shed light on all such influence campaigns in the United States.

FARA in research

Since FARA filings are rarely enforced, the data within each registration can vary wildly. The most common information included in filings is the most basic: the names of the companies, the foreign entity for which they are working, a broad goal or description of activities, and the amount of money paid by the foriegn principal. Even with the limitations of inconsistently filed and incomplete information, FARA registrations can still 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 for economic and policy endeavors . 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.

Generally, FARA research finds that investments in public relations campaigns in the U.S. 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) and in increased coverage across media (Lee, 2007). But these efforts often don't always work as well as intended (Lee & Hong, 2012; Zhang & Cameron, 2003). 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 & William Gawande, 2007).

In addition to studies on how effective public relations can be, FARA records have been used to reveal common strategies of public relations and how their investments, strategies, and organizational structures shift over time (Al-Yasin & Dashti, 2009; Ettinger, 1946; Johnson, 2005). To take one example, Al-Yasin and Dashti (2009) studied how Saudi Arabia, The United Arab Emirates, and Kuwait increased their public relations and lobbying efforts in the U.S. after political crises like Iraq's invasion of Kuwait and the Bank of Commerce and Credit International scandal. By analyzing not only the expenditures but also the communication strategies, Al-Yasin and Dashiti highlighted how instances of false and misleading information were included in PR campaigns carried out by U.S. agencies on behalf of foreign governments.

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. Strategic communication 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 peer-reviewed studies we examined, one was published in the *British Journal of Political Science* (Manheim & Albritton, 1987), one in *Journalism Quarterly* (Albritton & Manheim, 1983), one in the *Journal of Promotion Management* (Al-Yasin & Dashti, 2009) and another in *Public Opinion Quarterly* (Ettinger, 1946). The primary publisher of FARA research is *Public Relations Review*, accounting for seven of the eleven peer-reviewed studies using FARA data 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 (Assessing Russian Activities and Intentions in Recent US Elections, 2017; Kim et al., 2018), we know little about the apparently legal efforts that U.S. firms engage in on behalf of foreign countries.

As such – and to bring this work into the realm of political communication – we aim to map the legal work U.S. consultancies and public relations firms engage in across social and digital media platforms on behalf of foreign governments. We examine the content of these efforts and their reach into U.S. media coverage. Finally, we also document the compliance of these firms as revealed through their FARA filings.

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 (Kreiss, 2016; Kreiss & Saffer, 2017). 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 and have worked the last three presidential campaigns on both sides of the aisle. 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 database[8] 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 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 Saudi Arabia. From 2015 through 2017, Targeted Victory brought in over 1.6 USD 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. USD

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 44,000 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. 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 site,[9] "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" favorable to the kingdom.

Using MediaCloud, we searched for mentions of the @ArabiaNow 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 Labor Party in the United Kingdom.[10] Precision Strategies worked for Prime Minister Justin Trudeau's Liberal Party of Canada during the October 2015 parliamentary election.[11] 270 Strategies touts its work on a "number of international electoral efforts" and provides a case study on Canada's The Broadbent Institute.[12] On the Republican side, Harris Media showcases their work for Benjamin Netanyahu campaign for Prime Minister in Israel in 2015.[13] It is unclear if this sort of work should require FARA filings as well, though it is certainly a possibility. If any of these firms, "(iii) within the United States solicits, collects, disburses, or dispenses contributions, loans, money, or other things of value for or in the interest of such foreign principal ...[14]" then they would be subject to FARA requirements. However, if their work is entirely outside the United States, they would not. The difficulty here is the nature of the internet. An e-mail list for the Labor Party may contain e-mail addresses that reach U.S. citizens. A website and online press releases for Justin Trudeau could easily be accessed by Americans, and may sometimes be directed toward members of the U.S. media or elected officials.

Foreign propaganda on social media

In the second half of our analysis, we examine the work done by U.S. public relations firms for foreign governments or entities, with an express focus on social media efforts. 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 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 Department of Justice 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 during this brief time period. Via Twitter's API, we downloaded and examined the tweets sent by each of the accounts (Kearney, 2019).

Our initial examination of these efforts reveals many accounts – and associated posts – that promote general interest in and tourism promotion about their affiliated country. For this study, we narrowed our focus to countries with available data and FARA disclosures that are – at this moment in time – particularly interesting from a political communication perspective. These countries or entities are: the United Arab Emirates (UAE), Saudi Arabia, the Kingdom of Bahrain, and Qatar. Seven U.S.-based registrants filed FARA disclosures for their work on behalf of these countries.

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 nonprofits.

The FARA filing we examined, provided to us by the FBI, reveals a multitude 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 conducted significant 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 USD to Twitter, 10,000 USD to Outbrain, 27,987 USD to Taboola, and 41,250 USD to Zignal Labs for "digital support," as well as 25,079 USD to Klip Media Group and 719 USD 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 common strategy for MSL/Qorvis. 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. 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 contain 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

13,600 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 Nations.[15]" A search of MediaCloud does not reveal @YCHOperations tweets as featured in news stories. The YouTube accounts hosts only four videos, all with less than a few dozen views.
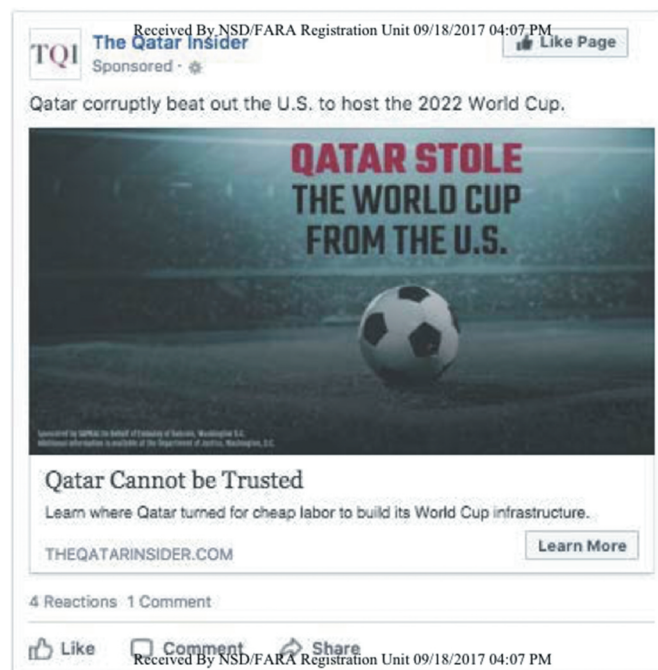
SAPRAC, Inc. and Craft Media Digital for the Kingdom of Bahrain

SAPRAC, Inc. (Saudi American Public Relation Affairs Committee) is a communications agency whose sole purpose is Saudi/U.S. relations. 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 1.2 USD million advertising campaign on behalf of Bahrain to "educate the public about the relationship between Qatar and North Korea." The FARA supplemental form discloses that SAPRAC sub-contracted Craft Media Digital for a total of 1.1 USD million – 921,000 USD for "ad placements, fees, costs," 20,000 USD for "video editing," and 182,000 USD 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 had 16,900 followers before it was suspended as part of a takedown of state-related accounts by Twitter in 2019.

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 include messaging on the 2022 World Cup, including that "Qatar corruptly beat out the

Figure 1. An image submitted to the Department of Justice by SAPRAC, Inc. Time and date stamp by the DOJ visible on the top and bottom of the image. In the bottom left of the Facebook image, the disclaimer stating that SAPRAC ran this communication on behalf of the Kingdom of Bahrain is barely visible. Post reactions and comments are visible.

U.S. to host the 2022 World Cup" (see Figure 1) and "Why is Qatar seeking North Korean forced labor to build its 2022 World Cup Infrastructure?"

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 website development for commercial clients. On October 30, 2018 Craft filed a FARA supplemental statement, but it now 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 advertising.[16]"

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 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 companies, but none have financial amounts attached.[17] Nor does this filing list any other social media accounts or the content of the ads created and placed. A search on MediaCloud does not 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 USD 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 (see Figure 2).

The Podesta Group, which shut down after being pulled into the Mueller investigation, 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,[18] 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."
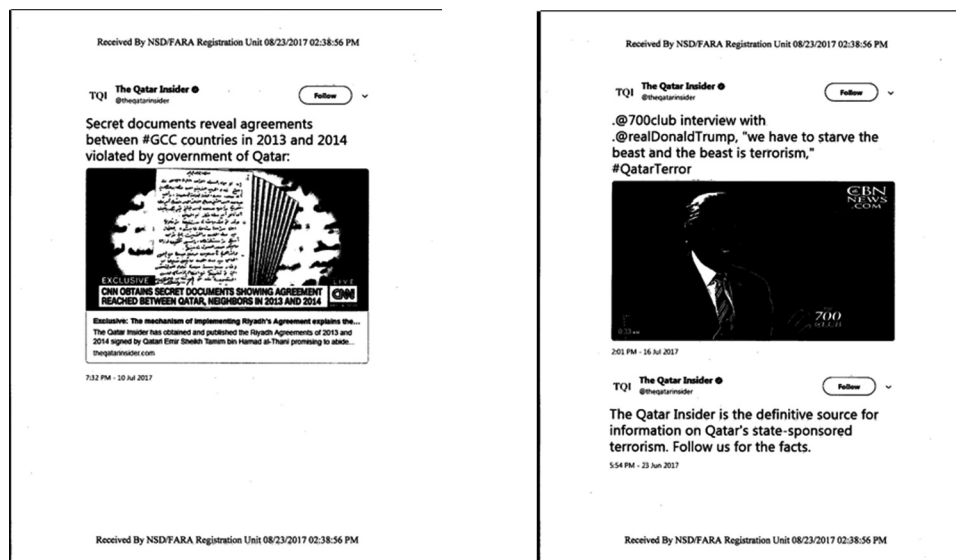
Figure 2. Page 22 and 35 of 108 in the Podesta Group's filing to the Department of Justice. Comments and retweets are not visible.
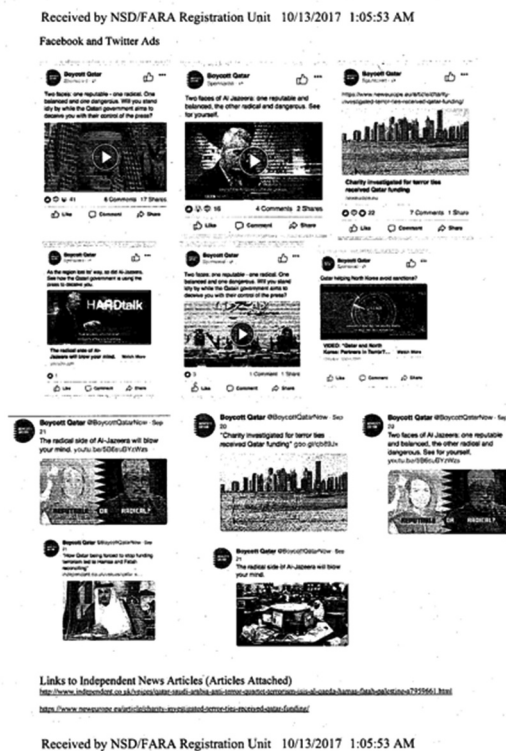
SCL lLmited for UAE

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.[19] 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 were paid 650,000 USD. The supplemental statement also shows that SCL spent 64,526 USD on various ad buys on Facebook, Google's AdWords, YouTube, Outbrain, and Twitter. In particular, SCL spent 13,386 USD on Facebook ad buys and 24,630 USD 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.[20] 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 Korea (see Figure 3).[21] 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 1,145 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 USD was spent on these Twitter ads. No ads appear in the Twitter ad archive, which was also launched in 2018.

Because these ads appeared before Google, Facebook, and Twitter launched their respective ad archives in 2018, we cannot verify that these

Figure 3. Page 2 of 10 of SCL's filings with the Department of Justice, containing all of the Facebook and Twitter posts in the filing. Likes and reactions are visible on Facebook posts comments and retweets are not visible on tweets.

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 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." They were paid 776,129 USD for their work. The

FARA supplemental statement, filed on March 2, 2018, covers the six-month period preceding January 31, 2018. The statement lists 567,580 USD worth of disbursements, including 2,122 USD 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 USD for digital ad placement through Google ($117,885), Twitter ($35,586), Facebook ($40,092), and Turn ($207,781).

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 (see Figure 4). 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. 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 (see Figure 5). Meaning, since the ads do not contain a disclosure saying that they were paid for by Qatar, they look like they were paid for by the publishers themselves (The Hill, Reuters, and other news outlets).

The limitations of FARA disclosures

As our analysis details, 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

Figure 4. The two Facebook posts included in Audience Partner's (A4) FARA submission. Page 15 of 17. Likes and reactions are not visible.

Figure 5. Native or google search ads filed by Audience Partners (A4). Page 16 of 17.

cares about through organic and paid social media posts as well as native digital advertising; these paid communications' origins are often strategically ambiguous. This includes geotargeting social media advertising to locations of events at which the foreign principal's desired audience will be in attendance. Firms target organic messages to journalists and other elites on social media, including Twitter. We do not have targeting information available for promoted posts. 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, Straus (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 Grassley's latest bill co-sponsored by two Democrats and five 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).

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 datasets from Twitter only include 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 USD 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 comparisons cumbersome. As of October of 2019, Twitter no longer allows political ads or ads by state media, which would likely encompass all the accounts in our research. But in June of 2018, prior to banning political advertising and advertisements from state media, Twitter launched its Advertising Transparency Center which included political ads. While all ads that have run in the past seven days are visible in Twitter's Advertising Transparency Center, the political ads had more detail alongside them and were archived for an extended period of time. Unfortunately, the political ad archive was released after all the FARA filings we studied had concluded. Because of this, although all the content of almost all tweets in the FARA database might rationally be deemed "political," none of them appear in the Twitter's Advertising Transparency Center. If such tweets were promoted now, almost all of them would likely be taken down under Twitter's State Media Policy which prohibits "news media entities controlled by state authorities" from buying ads.[22] If they were not in violation of this policy, they would only be visible in the Advertising Transparency Center for seven days.

Facebook's Ad Library for Issue, Electoral, and Political ads was released in June of 2018, again after all the FARA filings we studied concluded. Facebook allows political advertising and defines it broadly to include ads about social issues. The list of social issues for the United States includes "political values and governance" as well as "security and foreign policy".[23] All political ads are stored in the Ad Library for seven years.[24] Facebook's definition does not explicitly include state media or FARA registrants, so many of the advertisements in our research likely would not be deemed "political," though others that directly reference North Korea or terrorism could as they are related to "security and foreign policy." Google's definition

of political for an advertisement to be placed in its political advertising transparency report is limited to just election ads that "feature a current office-holder or candidate for an elected federal or state office, federal or state political party, or state ballot measure, initiative, or proposition that qualifies for the ballot in a state."[25] This means that virtually none of the content that we reviewed would be included in Google's political advertising transparency report.

As a clear recommendation, platform companies should treat many more of these accounts as "political" so that digital ads are archived completely. 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.

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, but the tradeoff would be worth it. In the current system these metrics are still unavailable. Of the seven identified firms that listed social media as part of their work for foreign principles, five of those firms filed copies of social media content with the Department of Justice. Of those five, only one reliably included any engagement or performance metrics. 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 tech companies themselves reveal in their ill-defined 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. The screenshotted social media posts filed with the Department of Justice sometimes clearly include "promoted" for Twitter or

"sponsored" for Facebook within the screenshot, but not always. Without explicitly saying if these other a tweets or posts were promoted or not, it is unclear if those posts were paid. 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. Journalists not only rely on Twitter to report public opinion (McGregor, 2019), which could be influenced by social and digital efforts – they also use Twitter to determine what is newsworthy (McGregor & Molyneux, 2020). 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 without significant concern for the websites they are placed on, 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 social media platforms 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 they contacted at particular media organizations. Similar information should be required of digital and social media advertisements as well.

Because of the limitations in FARA data, our analysis also has limitations. 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 (which we know to be incomplete). This type of information would be necessary for much needed future work that attempts to systematically categorize the strategies used in these types of communication. On top of that, more financial accounting is needed to understand the scope of these strategic campaigns. 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 two out of four of the relevant registrants on their digital ads such as banners (SAPRAC, Inc and Audience Partners), and only by one out of five of the relevant registrants on their social media ads (SAPRAC, Inc.). 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.

Conclusion

Despite the significant limitations laid out above, to our knowledge, this is one of the first studies to examine the paid, legal work that U.S. political firms carry out on digital and social media platforms at the behest of foreign countries. This is despite the fact that from 2016 on, there has been considerable public, press, academic, and government attention paid to attempts by foreign actors to utilize social media to influence U.S. citizens. Our study maps this legal work that U.S. digital consultancies and public relations firms carry out on digital and social media platforms on behalf of foreign actors, the content of these efforts, and whether or not it appears in U.S. news coverage. We find that these agents acting on behalf of foreign principles use a variety of strategies across digital and social media platforms, including web sites, social media accounts – utilizing both organic and paid posts, and native digital advertising. Almost none of these featured the required disclosures linking the content to their country of origin.

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 some about the work itself – and 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 explicitly 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 Department of Justice, 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.

Notes

1. https://www.justice.gov/opa/pr/grand-jury-indicts-thirteen-russian-individuals-and-three-russian-companies-scheme-interfere
2. https://www.fara.gov/
3. https://www.justice.gov/nsd-fara/general-fara-frequently-asked-questions
4. https://oig.justice.gov/reports/2016/a1624.pdf
5. https://www.justice.gov/nsd-fara/recent-cases
6. https://oig.justice.gov/reports/2016/a1624.pdf
7. https://www.nbcnews.com/news/us-news/mueller-effect-fara-filings-soar-shadow-manafort-flynn-probes-n838571
8. https://efile.fara.gov/ords/f?p = 1235:10
9. https://web.archive.org/web/20191104224159/http://www.arabianow.org/about-arabia-now/
10. https://web.archive.org/web/20191102155232/https://tools.bluestatedigital.com/clients
11. https://web.archive.org/web/20191102155258/https://www.precisionstrategies.com/case-studies/liberal-party-canada/
12. https://web.archive.org/web/20191102155400/https://270strategies.com/case-studies/broadbent/
13. https://web.archive.org/web/20191102155502/https://www.harrismediallc.com/client/
14. https://www.justice.gov/nsd-fara/fara-index-and-act
15. https://web.archive.org/web/20191102162550/https://yemenplan.org/
16. https://efile.fara.gov/docs/6463-Exhibit-AB-20190701-2.pdf
17. https://efile.fara.gov/docs/6463-Amendment-20190701-1.pdf
18. https://web.archive.org/web/20160402050409/https://www.podesta.com/record/generating-us-goodwill-online-key-us-ally
19. SCL ceased operations and filed for bankruptcy shortly thereafter.
20. Though it is unclear whether these ads would have been deemed "political" by Facebook (and therefore placed in the archive), since they're not directly about U.S. politics.
21. Interestingly, the paid ads discredit Al Jazeera, but the organic posts don't target the news organization.
22. https://business.twitter.com/en/help/ads-policies/prohibited-content-policies/state-media.html

23. https://www.facebook.com/business/help/214754279118974
24. https://www.facebook.com/ads/library/
25. https://transparencyreport.google.com/political-ads/region/US

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