



U.S. Department of Justice

National Security Division

Counterintelligence and Export Control Section

Washington, DC 20530

August 1, 2019

**Via FedEx**

[REDACTED]  
Turkish Radio & Television Corporation  
529 14<sup>th</sup> Street, N.W., Suite 1273  
Washington, DC 20045-2200

Re: Obligation of Turkish Radio & Television Corporation to Register under the Foreign Agents Registration Act

Dear [REDACTED]:

Based upon the information reviewed by this office, we have determined that Turkish Radio & Television Corporation ("the Corporation"), which is the U.S. branch office of *Turkiye Radyo-Televizyon Kurumu* ("TRT"), is obligated to register under the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.* ("FARA" or the "Act"). The Corporation's obligation arises from its political activities *and* its actions as a publicity agent and information-service employee in the United States for the Government of Turkey and TRT, each of which is a foreign principal under the Act.

**I. Background**

On April 19, 2018, the FARA Unit sent a letter to Turkish Radio & Television Corporation ("the Corporation"), which is the U.S. branch office of TRT, explaining the reasons why the Corporation may be obligated to register pursuant to FARA, and requesting additional information to aid the FARA Unit's assessment. In a July 18, 2018, letter ("July Letter"), the Corporation responded to the FARA Unit's letter and provided numerous documents, which are discussed below. On September 20, 2018, the FARA Unit met with the Corporation and its counsel to discuss the Corporation's obligation to register pursuant to FARA. The Corporation indicated that it would inform the FARA Unit about whether it intended to register by October 1, 2018. On October 3, 2018, the FARA Unit spoke to counsel for the Corporation, and agreed to await a response until October 26, 2018. On October 29, 2018, counsel for the Corporation informed the FARA Unit that the Corporation did not intend to register pursuant to FARA.

**II. Foreign Agents Registration Act**

As you are aware, FARA requires agents of foreign principals engaged in specified activities to register with the Department of Justice and provide disclosures. The purpose of FARA is to inform the American public of the activities of agents working for foreign principals to influence U.S. Government officials or the American public about the domestic or foreign policies of the United States, or about the political or public interests, policies, or relations of a foreign country or a foreign political party. *See* 22 U.S.C. § 611(c).

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

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

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

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

### **III. Relevant Entities**

TRT is the national public broadcaster of Turkey.<sup>1</sup> TRT owns and operates 14 television channels, all of which are governed by the Radio and Television Supreme Council (“RTUK”).<sup>2</sup> RTUK is a regulatory body created by Turkish statute and composed of members elected by the Turkish Parliament.<sup>3</sup>

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<sup>1</sup> <https://www.trtworld.com/about>

<sup>2</sup> *Id.*

<sup>3</sup> <https://www.rtuk.gov.tr/en/about-rtuk/5297/5083/about-rtuk.html>

TRT World is the name of TRT's English language programming unit<sup>4</sup> and is listed on TRT's website as one of TRT's publications.<sup>5</sup> Based on the information provided in the July Letter, it does not appear that TRT World is a separate legal entity from TRT, but rather a division of TRT.

The Corporation is the Washington, DC, branch office of TRT.<sup>6</sup> As of November 2018, the Corporation consisted of approximately 30 employees including correspondents, video editors, engineers, and operational staff.<sup>7</sup> The Corporation represents TRT in the United States, where its main purpose and activity are to assist with and produce programs for dissemination by TRT across the world on TRT World platforms,<sup>8</sup> including in the United States. TRT produces content in the United States through the Corporation, which acts as its Washington bureau. TRT also disseminates this content and additional content (produced in Turkey and elsewhere) to the United States through various U.S. companies and U.S. platforms, as described below.

TRT content, some of which is produced by the Corporation, is distributed in the United States through U.S.-based Internet Protocol (IP) distribution services, U.S.-based social media platforms, and U.S.-based media companies. TRT is able to reach over 25 million devices through its distribution of TRT World content over U.S.-based distribution services<sup>9</sup> including AppleTV, YouTube, Amazon FireTV, Roku, Google Home Audio Service, and Amazon Alexa/Eco Audio Service.<sup>10</sup> TRT content is also distributed in the United States in the form of audio podcasts through iTunes, TuneIn, Stitcher, Google Play, and SoundCloud.<sup>11</sup> Finally, TRT distributes its TRT World-branded content directly to U.S. consumers through smartphone and tablet applications available at the U.S.-based Apple App Store and Google Play.<sup>12</sup>

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<sup>4</sup> July Letter at 2.

<sup>5</sup> See <http://www.trt.net.tr/Kurumsal/TelevizyonTanitim.aspx>.

<sup>6</sup> July Letter at 1.

<sup>7</sup> *TRT World launches new studio in Washington, D.C.*, Association for International Broadcasting (November 5, 2018), <https://aib.org.uk/trt-world-launches-new-studio-in-washington-d-c/>.

<sup>8</sup> July Letter at 1.

<sup>9</sup> *TRT World launches new studio in Washington, D.C.*, Association for International Broadcasting (November 5, 2018), <https://aib.org.uk/trt-world-launches-new-studio-in-washington-d-c/>.

<sup>10</sup> July Letter at 4-5.

<sup>11</sup> See <https://www.trtworld.com/connect>.

<sup>12</sup> *Id.*

TRT World-branded content, some of which is produced by the Corporation, is also distributed in the United States through U.S.-based social media platforms such as Facebook,<sup>13</sup> Instagram,<sup>14</sup> and Twitter.<sup>15</sup> In doing so, TRT “take[s] a distributed media approach to reaching and engaging audiences across their preferred platforms” and offers social media pages and handles for individual programs, including *The Newsmakers*, which, as described below, is partially produced in the United States by the Corporation.<sup>16</sup>

Finally, TRT, through the Corporation, [REDACTED]  
[REDACTED]  
[REDACTED]  
in Washington, DC.<sup>17</sup> TRT World content is also distributed through U.S.-based smartphone and tablet news applications such as the Google Play Newsstand, Apple News, News 360, and Flipboard.

#### **IV. Basis for the Corporation’s Obligation to Register Under FARA**

The Corporation is obligated to register under FARA because it is acting as an agent of two foreign principals: the Government of Turkey *and* TRT. As explained below, the Corporation is an agent of these foreign principals because it acts at the direction and control of both the Government of Turkey and TRT. The Corporation engages in three categories of activities in the United States on behalf of these foreign principals, each of which triggers its obligation to register pursuant to FARA: (i) it engages in political activities; (ii) it acts as a publicity agent; and (iii) it acts as an information-service employee.

##### *A. The Government of Turkey and TRT are “Foreign Principals” under the Act*

As noted above, FARA defines “foreign principal” to include “a government of a foreign country.” 22 U.S.C. § 611(b)(1). The Government of Turkey clearly meets this definition, and is a foreign principal under the Act.<sup>18</sup> FARA also defines “foreign principal” to include “a partnership, association, corporation, organization, or other combination of persons organized under the laws of or having its principal place of business in a foreign country.” 22 U.S.C. §

<sup>13</sup> See <https://www.facebook.com/trtworld>.

<sup>14</sup> See <https://www.instagram.com/trtworld>.

<sup>15</sup> See <https://twitter.com/trtworld>.

<sup>16</sup> <https://www.trtworld.com/connect>.

<sup>17</sup> July Letter at 5.

<sup>18</sup> “The term ‘government of a foreign country’ includes any person or group of persons exercising sovereign de facto or de jure political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign de facto or de jure authority of functions are directly or indirectly delegated.” 22 U.S.C. § 611(e).

611(b)(3). The July Letter states that TRT “is an entity organized under the laws of Republic of Turkey.”<sup>19</sup> TRT is thus also a foreign principal under the Act.

*B. The Corporation is Directed and Controlled by the Government of Turkey and TRT*

Agency under the Act occurs when an agent acts under a foreign principal’s “direction or control.” 22 U.S.C. § 611(c)(1). The Government of Turkey directs and controls the Corporation through its direction and control of TRT. The July Letter states that TRT was established on May 1, 1964, as an autonomous legal entity founded by legislation for the purpose of authorizing an entity to provide public radio and television broadcasting and that the Turkish Constitution describes TRT as an impartial public economic enterprise.<sup>20</sup> However, it is clear that the Government of Turkey exercises direction and control of TRT by regulation and oversight, and by controlling its leadership, budget, and content.<sup>21</sup>

As stated above, all of TRT’s channels are governed by RTUK. RTUK is a regulatory body created by Turkish statute and composed of members elected by the Turkish Parliament.<sup>22</sup> As such, RTUK is part of the Government of Turkey, and therefore provides the Government of Turkey with regulatory power over TRT. Second, as set forth in TRT’s founding documents, the Government of Turkey’s Council of Ministers partially controls the composition of TRT’s Board of Directors and TRT must obtain the approval of the Prime Minister to sign agreements, contracts, and protocols with international radio and television institutions.<sup>23</sup> The RTUK and the statutory provisions relating to it give the Government of Turkey control over how TRT operates. The term “control” in the Act, includes “the possession or the exercise of the power, directly or indirectly, to determine the policies or the activities of a person.” 28 C.F.R. Part 5.100(b). Third, the Government of Turkey exercises financial control over TRT, which receives its funds from Turkish taxes and government grants, in addition to advertising.<sup>24</sup> The Government of Turkey, therefore, controls TRT by deciding to either increase or decrease the amount of tax revenue or grants allotted to TRT. Additionally, the Government of Turkey’s approval is required for TRT to increase its capital,<sup>25</sup> making TRT beholden to the Government of Turkey if it wishes to grow and expand operations.

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<sup>19</sup> July Letter at 1-2.

<sup>20</sup> *Id.* at 2.

<sup>21</sup> *Id.* at Exhibit 1.

<sup>22</sup> <https://www.rtuk.gov.tr/en/about-rtuk/5297/5083/about-rtuk.html>.

<sup>23</sup> July Letter at Exhibit 1.

<sup>24</sup> *Id.* at 3.

<sup>25</sup> *Id.* at Exhibit 1.

The Government of Turkey also exercises direction and control over TRT content. For instance, TRT's general broadcasting principles, as set forth in Turkish law, include the requirements to "[a]dhere to the essence and spirit of the Constitution; Protect the indivisible integrity of the State within its territory and nation, national sovereignty, the Republic, public order, public peace and public welfare;" "[e]nroot Ataturk's principles and reforms, ensure that the Republic of Turkey reaches national targets enabling to raise it to contemporary civilization level;" and "[c]omply with the basic views, purposes and principles of the Turkish national education."<sup>26</sup> Most explicitly, TRT is required to "[c]omply with the State's national security politics, national and economic interest requirements."<sup>27</sup>

Additional evidence of the Government of Turkey's direction and control of TRT is that TRT World content consistently mirrors the policy positions expressed by the Government of Turkey. As more fully described below, that includes content that the Corporation produces inside the United States and content that TRT distributes in the United States.

As for TRT, it directs and controls the Corporation in multiple ways, including financially and editorially. The July Letter states that the Corporation receives its funding from TRT and prepares and sends monthly budgets to TRT's headquarters in Turkey for approval.<sup>28</sup> On the editorial front, the Corporation is tasked with supporting production "[o]nce a given programming content idea has been determined by TRT World staff in Turkey, with input from TRT World offices in various countries."<sup>29</sup> Because the Corporation is obligated to exercise its production of programming pursuant to these financial and editorial constraints, the Corporation operates at the "order, request, or under the direction or control" of TRT pursuant to FARA, which creates an agency relationship between the two entities.<sup>30</sup>

TRT's production activities within the United States are conducted through the Corporation. The Corporation operates as a foreign corporation in the District of Columbia.<sup>31</sup> TRT uses the Corporation to produce several programs, either partially or completely. These programs, according to the July Letter, include *Newsmakers*, *Straight*

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<sup>26</sup> *Id.*

<sup>27</sup> *Id.*

<sup>28</sup> *Id.* at 3.

<sup>29</sup> *Id.* at 2.

<sup>30</sup> 22 U.S.C. § 611(c)(1). See *Attorney General of the United States of America v. Irish Northern Aid Committee*, 668 F.2d 159, 161 (2d Cir. 1982) (in determining agency for purposes of FARA, the concern is not whether the relationship meets a common law definition of agency, but whether the relationship warrants registration by the agent to carry out the informative purpose of the Act).

<sup>31</sup> July Letter at Exhibit 6.

*Talk*, and *Round Table*, which focus on current affairs, and also programs about sports, arts, and culture.<sup>32</sup> The Corporation also hosts guests in its Washington, DC studios in connection with various TRT World programs, assists with the production of TRT World programs—or a portion of the news programs—that report on daily White House, State Department, and Pentagon briefings, and provides input and recommendations regarding the type and content of programs to be produced by TRT World with the assistance of the Corporation.<sup>33</sup>

In your correspondence with the FARA Unit, you have argued that since the Corporation operates as a foreign corporation in the District of Columbia, it does not have a separate corporate existence from TRT.<sup>34</sup> From this, you conclude that as the Corporation and TRT are the same legal entity, the Corporation cannot be an agent of TRT and, therefore, need not register under FARA. We disagree. As you state, the Corporation is “the Washington branch office” of TRT.<sup>35</sup> The Act defines “person” in 22 U.S.C. § 611(a) as “an individual, partnership, corporation, organization, or any other combination of individuals.” Here, the Corporation certainly is, at a minimum, an “organization” or “combination of individuals,” and thus a “person” under the Act.

Moreover, even if there were merit to your position that there is no difference between the Corporation and TRT under the Act, that would simply necessitate TRT registering as a foreign agent of the Government of Turkey. As described above, the Government of Turkey exercises direction and control of TRT by regulation and oversight, and by controlling its leadership, budget, and content. TRT undoubtedly acts in the United States through the Corporation. As also stated above, TRT distributes its content in the United States through agreements with traditional media outlets, social media, IP distribution services, and the TRT World website.

*C. The Corporation Engages in “Political Activities” on Behalf of The Government of Turkey and TRT*

The Corporation’s conduct on behalf of the Government of Turkey and TRT are “political activities” intended to “influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.” 22 U.S.C. § 611(o).

TRT, based on its “Basic Principles and Broadcasting Principles,” is inherently political, as it is required to “[c]omply with the State’s national security politics, national and economic

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<sup>32</sup> *Id.* at 5.

<sup>33</sup> *Id.* at 2.

<sup>34</sup> *See Id.* at 2.

<sup>35</sup> *Id.* at 1.

interest requirements.”<sup>36</sup> These requirements apply to United States-based staff of the Corporation, as job postings for positions with the Corporation state that employees will be responsible for ensuring TRT World’s editorial guidelines and values are adhered to.<sup>37</sup> Indeed, TRT President Şenol Göka said the aim of TRT World is to “spread the voice of Turkey to the world.”<sup>38</sup>

As you noted in the July Letter, TRT, in the United States and elsewhere, produces “broadcasts in English in order to allow Turkey to express itself better to the world” consistent with the stated purpose of TRT World.<sup>39</sup> For example, one of the programs produced in part in the United States by the Corporation is *Straight Talk*.<sup>40</sup> According to a video titled “Welcome to Straight Talk” and available on the TRT World website, *Straight Talk* “give[s] much needed context to the Turkish perspective on global events.” The video further claims that *Straight Talk* “demystif[ies] Turkey’s policies” and provide the viewer with “unique insight into the decisions of the country’s policy makers.”<sup>41</sup>

TRT broadcasts regularly echo the policies and positions of the Government of Turkey, and those policies and positions are disseminated in the United States. For example, the U.S. Government’s support of Kurds in Iraq and Syria has been a source of tension between the U.S. Government and the Government of Turkey. Turkey’s Prime Minister, Binali Yildirim, has described U.S. support of Kurds in Syria as “against its alliance” with Turkey.<sup>42</sup> This is particularly true of the U.S. Government’s decision to supply arms to YPG fighters in Syria.<sup>43</sup> The Government of Turkey considers the YPG and its political wing, the Kurdish Democratic Union Party (PYD), to be terrorist groups with ties to the banned Kurdistan Workers’ Party

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<sup>36</sup> *Id.*

<sup>37</sup> *Id.* at Exhibit 1.

<sup>38</sup> *Turkey officially welcomes first English-language channel TRT World*, Daily Sabah (November 15, 2016), <https://www.dailysabah.com/turkey/2016/11/15/turkey-officially-welcomes-first-english-language-channel-trt-world>.

<sup>39</sup> See July Letter at Exhibit 5.

<sup>40</sup> *Id.* at 5.

<sup>41</sup> *Welcome to Straight Talk*, <https://www.trtworld.com/video/strait-talk/welcome-to-strait-talk/5c05389fe3c0992f2763903c>.

<sup>42</sup> *US statements on YPG, Syria contradict each other: Turkish PM Yildirim*, Hurriyet Daily News (January 18, 2018), <http://www.hurriyetdailynews.com/us-statements-on-ypg-syria-contradict-each-other-turkish-pm-yildirim-125928>.

<sup>43</sup> Phil Stewart, *U.S. to arm Syrian Kurds fighting Islamic State, despite Turkey's ire*, Reuters (May 9, 2017), <https://www.reuters.com/article/us-mideast-crisis-usa-kurds-idUSKBN18525V>.

(PKK) in Turkey.<sup>44</sup> Consistent with TRT policy and the stated goals of TRT World, TRT (and thus the Corporation) hues to Turkish policy in content about the YPG. For example, in an episode of *Straight Talk*, a reporter said that “Turkey opposes arming one terror group to fight another” when referring to U.S. efforts to arm the YPG.<sup>45</sup> Similar reporting is found elsewhere on TRT World’s website, which is available in the United States.<sup>46</sup>

Another example is TRT efforts to influence the U.S. Government and public opinions on exiled Turkish cleric Fetullah Gulen, who resides in Pennsylvania and whom the Government of Turkey blames for orchestrating a failed coup attempt in July 2016.<sup>47</sup> Through its platforms, TRT echoes the Government of Turkey’s position, bluntly stating that “[t]he Fetullah Terrorist Organisation (FETO) and its US-based leader Fetullah Gulen orchestrated the defeated coup of July 15, 2016, which left 251 people dead and nearly 2,200 injured.”<sup>48</sup> TRT content produced by the Corporation in the United States furthers the Government of Turkey’s position. For example, in a video shot and produced in and around Washington, DC, a TRT World reporter described Gulen as “the head of the FETO terror group,” reflecting the Government of Turkey’s official position.<sup>49</sup>

TRT further used the Corporation to produce content in the United States explaining the Government of Turkey’s position on Gulen through the program *The Newsmakers*.<sup>50</sup> In an episode titled “*The Newsmakers: U.S.-Turkey Relations*,” a panel consisting of a journalist for a

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<sup>44</sup> Umut Uras, *Erdogan: US made a serious mistake on Syrian Kurdish YPG fighters*, Al Jazeera News (January 9, 2019), <https://www.aljazeera.com/news/2019/01/erdogan-mistaken-syrian-kurd-fighters-safety-190108094851818.html>.

<sup>45</sup> *Turkey targets YPG strongholds in northern Syria / Iran Sanctions*, TRT World, <https://trtworld.com/video/straight-talk/turkey-targets-ypg-strongholds-in-northern-syria-iran-sanctions/5be5b946315f18291a6cabc2>.

<sup>46</sup> See e.g., *Contrary to US stance, former SDF spokesman says YPG takes order from PKK*, TRT World (November 30, 2018), <https://www.trtworld.com/middle-east/contrary-to-us-stance-former-sdf-spokesman-says-ypg-takes-orders-from-pkk-22032>; *The PKK-YPG Connection*, TRT World (undated), <https://www.trtworld.com/video/social-videos/the-pkk-ypg-connection/5c012a54e3c0992f27638a75>.

<sup>47</sup> See Lauren del Valle, Jason Hanna and Tony Marco, “Warning shot” wards off intruder at exiled Turkish cleric Fetullah Gulen’s Pennsylvania home, group says, CNN (October 3, 2018), <https://www.cnn.com/2018/10/03/us/pennsylvania-fetullah-gulen-compound/index.html>.

<sup>48</sup> *Turkey arrests 59 ex-police officers in FETO probe*, TRT World (November 1, 2018), <https://www.trtworld.com/turkey/turkey-arrests-59-ex-police-officers-in-feto-probe-21289>.

<sup>49</sup> *Turkey’s Failed Coup: Fetullah Gulen’s extradition at a standstill*, TRT World (undated), <https://www.trtworld.com/video/news-videos/turkeys-failed-coup-fetullah-gulens-extradition-at-a-standstill/5b49e34e0ab8e2110bae8de2>.

<sup>50</sup> July Letter at 5.

“pro-government” paper who is also a member of the Istanbul AK Party Administrative Board,<sup>51</sup> an attorney representing the Government of Turkey in its efforts to extradite Gulen who was appearing from the United States, and an analyst discussed Gulen in the context of U.S.-Turkey relations.<sup>52</sup> The program framed the issue as one of “Washington’s sheltering of the shadowy figure Fetullah Gulen” and stated that, “for Turkey, [the] reclusive cleric who lives in the U.S. state of Pennsylvania is the man responsible for one of the bloodiest events in recent Turkish history.”<sup>53</sup> The program further gave voice to the Government of Turkey’s arguments for why Gulen should be extradited and included claims that Gulen is part of a large criminal enterprise in the United States that makes political contributions.<sup>54</sup>

The above examples demonstrate that TRT and the Corporation adopt the Turkish Government’s point of view, which is intended to be persuasive. This persuasive content, produced in the United States by the Corporation, is disseminated to the U.S. through U.S.-based companies and services, including the YouTube channel and social media. By producing content in the United States that targets a U.S. audience and is disseminated in the United States, the Corporation is attempting to “influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.” 22 U.S.C. § 611(o).

Based on all of the above, it is clear that the Corporation is engaged in “political activities” for both the Government of Turkey and TRT under FARA. 22 U.S.C. § 611(o).

*D. The Corporation Acts as a “Publicity Agent” and “Information-Service Employee” for its Foreign Principals*

The Corporation also acts as a publicity agent for the Government of Turkey and TRT. A “publicity agent” includes “any person who engages directly or indirectly in the publication or dissemination of oral, visual, graphic, written, or pictorial information or matter of any kind, including publication by means of . . . broadcasts, motion pictures or otherwise.” 22 U.S.C. § 611(h). As described above, TRT produces English-language programming intended for a U.S. audience in the United States in the form of contributions to news reports and through the production of shows such as *The Newsmakers* and *Straight Talk*. Further, the Corporation disseminates its content in the United States through broadcast media within the United States,

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<sup>51</sup> The AK Party, or Justice and Development Party, is the ruling party of Turkey and includes Turkish President Recep Tayyip Erdogan. *The World Fact Book*, Central Intelligence Agency, [https://www.cia.gov/library/publications/the-world-factbook/geos/print\\_tu.html](https://www.cia.gov/library/publications/the-world-factbook/geos/print_tu.html).

<sup>52</sup> *The Newsmakers: U.S.-Turkey Relations*, TRT World (May 16, 2017), <https://www.trtworld.com/video/the-newsmakers/the-newsmakers-us-turkey-relations/5a40bce341736a1f528ad33f>.

<sup>53</sup> *Id.*

<sup>54</sup> *Id.*

such as NBC News Channel and news applications, as well as through U.S.-based social media companies and IP distributors.

Similarly, the Corporation's activities establish that it is an "information-service employee" for the Government of Turkey and TRT. The Act defines "information-service employee" to include "any person who is engaged in furnishing, disseminating, or publishing accounts, descriptions, information, or data with respect to the political, industrial, employment, economic, social, cultural, or other benefits, advantages, facts or conditions of any country other than the United States or of any government of a foreign country." 22 U.S.C. § 611(i). The Corporation is "furnishing" such material by producing English language content that it disseminates in the United States that "allow[s] Turkey to express itself better to the world."<sup>55</sup> For example, *Straight Talk*, which is produced in part by the Corporation in the United States,<sup>56</sup> featured programing about how Turkey is becoming a popular destination for health tourists<sup>57</sup> and how Turkey's health industry is a booming business,<sup>58</sup> among other stories about Turkey. These constitute "accounts, descriptions, information, or data with respect to the political, industrial, employment, economic, social, cultural, or other benefits, advantages, facts or conditions of" Turkey.<sup>59</sup>

## V. Conclusion

The Corporation is obligated to register under FARA because it acts at the direction and control of both the Government of Turkey and TRT, both of which are foreign principals. The Corporation's activities on behalf of the Government of Turkey and TRT satisfy the definition of three specified activities that require registration under FARA: (i) engaging in political activities; (ii) acting as a publicity agent; and (iii) acting as an information service employee. The content produced by the Corporation and disseminated in the United States under the TRT World brand seeks to "influence . . . any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States, or with reference to the political or public interests, policies, or relations" of Turkey, for or in the interests of Turkey, and is therefore "political activit[y]." See 22 U.S.C. § 611(o). The Corporation's role in producing content in the United States, for dissemination in the United States, at the order, request, or under

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<sup>55</sup> July Letter at Exhibit 5.

<sup>56</sup> *Id.* at 5.

<sup>57</sup> *Turkey is becoming a popular destination for health tourists*, <https://www.trtworld.com/video/strait-talk/turkey-is-becoming-a-popular-destination-for-health-tourists/5b9777b758cd863d6876d94a>.

<sup>58</sup> *Turkey's health industry is a booming business*, <https://www.trtworld.com/video/strait-talk/turkeys-health-industry-is-a-booming-business/5b896de40ab8e2110baee941>.

<sup>59</sup> *Turkey's Failed Coup: Fetullah Gulen's extradition at a standstill*, TRT World (undated), <https://www.trtworld.com/video/news-videos/turkeys-failed-coup-fetullah-gulens-extradition-at-a-standstill/5b49e34e0ab8e2110bae8de2>.

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the direction and control of the Government of Turkey and TRT, means that it is serving both as a "publicity agent" and an "information-service employee," separately triggering an obligation to register under the Act. *See* 22 U.S.C. § 611(h) and 22 U.S.C. § 611(i).

To be clear, registration would not require the Corporation to alter the content of its programming in any manner; indeed, if registered as required, the Corporation would be free to facilitate the production, publication, and dissemination of any content it chooses. Registration would simply allow media outlets purchasing programming produced by the Corporation, social media outlets posting programming, and American viewers watching such programming to be fully informed regarding the foreign influence behind the content.

Please effect the Corporation's registration within thirty (30) calendar days of the date of this letter. Useful information and forms needed for registration may be found on our website at <http://www.fara.gov>. If you have any questions regarding registration, or have additional information to provide, please contact [REDACTED] or [REDACTED] at (202) 233-0776, or send an email to [FARA.Public@usdoj.gov](mailto:FARA.Public@usdoj.gov).

Sincerely,

[REDACTED]  
Brandon Van Grack  
Chief  
FARA Unit

cc: [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]