



October 31, 2024

**Via Electronic Mail**

Hon. Matthew G. Olsen, Assistant Attorney General for National Security  
FARA Unit, National Security Division  
U.S. Department of Justice  
175 N Street, NE  
Constitution Square, Building 3-Room 1.300  
Washington, DC 20002  
fara.public@usdoj.gov

**Request for Foreign Agents Registration Act Investigation of the Center for Countering Digital Hate Inc. and Members of its Board and Leadership Team**

Dear Mr. Olsen:

The Foreign Agents Registration Act, 22 U.S.C. § 611 *et seq.* (“FARA”) was enacted “to protect the national defense, internal security, and foreign relations of the United States by requiring public disclosure by persons engaging in propaganda activities and other activities for or on behalf of foreign governments, foreign political parties, and other foreign principals so that the Government and the people of the United States may be informed of the identity of such persons and may appraise their statements and actions in the light of their associations and activities.”<sup>1</sup>

To that end, the Department of Justice invites persons who believe that an individual or entity may have an obligation to register to contact the FARA unit and request an investigation.<sup>2</sup> America First Legal Foundation (“AFL”),<sup>3</sup> based on evidence publicly available and evidence obtained through its investigations of state and Federal

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<sup>1</sup> *Meese v. Keene*, 481 U.S. 465, 469 (1987) (quoting 56 Stat. 248, 77 Cong. Ch. 263, (Apr. 29, 1942)) (cleaned up).

<sup>2</sup> *Foreign Agents Registration Act | Frequently Asked Questions*, U.S. DEPT OF JUST., <https://perma.cc/DCX5-8QHR>.

<sup>3</sup> America First Legal Foundation is a national, nonprofit legal foundation working to promote the rule of law, prevent executive overreach, protect due process and equal protection, and educate Americans about the individual rights guaranteed under the Constitution and laws of the United States. Our mission includes promoting government transparency and accountability by gathering official information, analyzing it, and disseminating it through reports, press releases, and media, including social media platforms, all to educate the public and to keep government officials accountable for their duty to faithfully execute, protect and defend the Constitution and laws of the United States.

agencies,<sup>4</sup> requests that the FARA Unit open an investigation of the Center for Countering Digital Hate Inc. (“CCDH US”) and members of its board and Leadership Team to determine whether they must register as agents of foreign principals, including the UK Labour Party and the Center for Countering Digital Hate Ltd. (“CCDH UK”), due to their coordinated efforts to censor American citizens’ speech and interfere with our elections.<sup>5</sup>

## I. Background

A FARA “foreign principal” includes “a government of a foreign country;” “a foreign political party;” a “person outside the United States,” unless such person is an individual and a citizen of and domiciled within the United States, or organized under or created by the laws of the United States or of any State subject to the jurisdiction of the United States and has its principal place of business in the United States; and/or a partnership, association, corporation, organization, or other combination of persons organized under or have its principal place of business in a foreign county.<sup>6</sup>

FARA further defines an “agent of a foreign principal” as “any person who acts as an agent, representative, employee, or servant, or any person who acts in any other capacity at the order, request, or under the direction or control, of a foreign principal or of a person any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign principal” and who directly or through another person, “engages within the United States in political activities for or in” the foreign principal’s interests; “acts within the United States as a public relations counsel, publicity agent, information-service employee or political consultant for or” in the foreign principal’s interests; “disburses ... money or other things of value for or in” the foreign principal’s interests; or represents the foreign principal’s interests “before any agency or official” of the United States government.<sup>7</sup>

Under FARA, “political activities” includes “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” regarding “policies of the United States.”<sup>8</sup> A “public-relations counsel” includes “any person who engages directly or indirectly in informing, advising, or in

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<sup>4</sup> See generally *Government Documents Confirm the Biden Administration’s Mobilization of U.S. Counterterrorism Assets to Support Imran Ahmed’s Global Censorship Campaign*, AM. FIRST LEGAL, <https://perma.cc/2KJT-AJ5G>; *America First Legal Launches Follow-up Investigation After Massachusetts Attorney General’s Office Withholds Censorship Records*, AM. FIRST LEGAL, <https://perma.cc/W7BF-39SR>.

<sup>5</sup> See, e.g., Stefan Boscia et al., *Donald Trump vs. the Labour Party*, POLITICO (Oct. 23, 2024), <https://perma.cc/HE3R-NQ8H>.

<sup>6</sup> 22 U.S.C. § 611(b).

<sup>7</sup> 22 U.S.C. § 611(c).

<sup>8</sup> 22 U.S.C. § 611(o).

any way representing a principal in any public relations matter pertaining to political or public interests, policies, or relations of such principal.”<sup>9</sup>

A foreign agent registration statement must be “detailed”<sup>10</sup> with a “degree of specificity necessary to permit meaningful public evaluation of each of the significant steps taken by a registrant to achieve the purposes of the agency regulation.”<sup>11</sup> Department of Justice regulations further require registrants to “keep and preserve” eight different categories of “books and records,” including “communications to and from all foreign principals and all other persons, relating to the registrant’s activities on behalf of, or in the interest of any of his foreign principals”; communications “relating to political activity on the part of any of the registrant’s foreign principals”; and “bookkeeping and other financial records.”<sup>12</sup> Such records must be “readily accessible for inspection” by the Department of Justice.<sup>13</sup>

Any person who willfully violates any provision of FARA or any regulation thereunder shall, upon conviction thereof, be punished by a fine of not more than \$250,000 or by imprisonment for not more than five years.<sup>14</sup>

## II. The UK Labour Party and CCDH UK Are Foreign Principals

The UK Labour Party is a foreign political party and a FARA foreign principal.<sup>15</sup> It is registered with the Electoral Commission of the United Kingdom under the primary name of “Labour Party,” alternative name of “Llafur,” and address at 20 Rushworth Street, London, United Kingdom, SE1 0SS.<sup>16</sup> Its leader, United Kingdom Prime Minister Keir Starmer, has suggested toughening the British censorship law, the Online Safety Act, to impose a legal duty on social media companies to take down posts that they consider to be “legal but harmful.”<sup>17</sup> Starmer has clashed with Elon Musk over X,<sup>18</sup> and his UK Labour Party colleague, technology minister Peter Kyle, even suggested using compulsory legal process to summon Mr. Musk to the United Kingdom.<sup>19</sup>

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<sup>9</sup> 22 U.S.C. § 611(g).

<sup>10</sup> 22 U.S.C. § 612.

<sup>11</sup> 28 C.F.R. § 5.210.

<sup>12</sup> 28 C.F.R. § 5.500.

<sup>13</sup> 28 C.F.R. § 5.500(b).

<sup>14</sup> See 22 U.S.C. § 618(a); 18 U.S.C. § 3571.

<sup>15</sup> 22 U.S.C. § 611(b)(1).

<sup>16</sup> *View Registration*, ELECTORAL COMMISSION, <https://perma.cc/3AHX-BG9R>.

<sup>17</sup> Amy Gibbons et al., *Tech Giants Will Be Forced to Ban Fake News Under Labour Plans*, TELEGRAPH (Aug. 9, 2024), <https://perma.cc/3H34-8RMP>; Toby Young, *Will Starmer Make the Online Safety Act Even Worse?* SPECTATOR (Aug. 17, 2024), <https://perma.cc/C9KJ-HVVV>.

<sup>18</sup> Eshe Nelson, *Elon Musk Clashes With Keir Starmer Over Riots in Britain*, N.Y. TIMES (Aug. 7, 2024), <https://perma.cc/9H4V-72RY>.

<sup>19</sup> Ryan Browne, *British Government Had ‘Constructive’ Talks With Musk’s X Over Disinformation, Minister Says*, CNBC (Sept. 13, 2024), <https://perma.cc/ER33-SJGH>.

The Center for Countering Digital Hate Ltd. (“CCDH UK”)<sup>20</sup> is a United Kingdom-based private company and a FARA foreign principal.<sup>21</sup> It was incorporated as a private limited company in 2018 by Mr. Starmer’s now-chief of staff, Morgan McSweeney, under the name Brixton Endeavours Limited at Langley House, Park Road, East Finchley, London, United Kingdom, N2 8EY.<sup>22</sup> Current and former government officials of the United Kingdom participate in CCDH UK’s governance. On its Board sits Damian Collins, a former Member of Parliament and Parliamentary Under Secretary of State for Tech and Digital Economy at the Department for Digital, Culture, Media, & Sport, and Lord Jonathan Oates, a sitting member of the House of Lords.<sup>23</sup>

CCDH UK shares an address with “Labour Together,” a think tank associated with the UK Labour Party.<sup>24</sup> Labour Together’s chief executive, Jonathan Ashworth, met with Kamala Harris’s campaign at the Democratic National Convention in Chicago to advise them on policy issues ahead of the general election.<sup>25</sup> Paul Thacker and Matt Taibbi have dubbed CCDH as Labour Together’s “messaging vehicle.”<sup>26</sup>

CCDH UK describes itself as a “not-for-profit non-governmental organization” that “works to stop the spread of online hate and disinformation through innovative research, public campaigns, and policy advocacy.”<sup>27</sup> But others have described them as “[a]n NGO cut-out engaged in brazen smearing, attacking of dissenting views, deplatforming, censoring and pro-active shrinkage of the Overton window [by] strategically conflating serious voices with the fringes, mixing them together to isolate genuine actors and squash dissent.”<sup>28</sup> Among other things, CCDH UK has taken credit for demonetizing *The Canary*, an independent British media outlet that

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<sup>20</sup> According to its website, there is also an affiliated “Center for Countering Digital Hate (UK) Charitable Fund” that “is a restricted fund operating under the auspices of Prism the Gift Fund, Registered Charity.” *About*, CTR. FOR COUNTERING DIGIT. HATE, <https://perma.cc/T4GA-XHNE>.

<sup>21</sup> 22 U.S.C. § 611(b)(3).

<sup>22</sup> See Steerpike, *Labour-Linked Censorship Group Plans to ‘Kill Musk’s Twitter’*, SPECTATOR (Oct. 23, 2024), <https://perma.cc/4BEZ-MNEA>; *CENTER FOR COUNTERING DIGITAL HATE LTD Overview*, GOV.UK, <https://perma.cc/24SZ-Y6F9>.

<sup>23</sup> See *CENTER FOR COUNTERING DIGITAL HATE LTD People*, GOV.UK, <https://perma.cc/VAV3-B2PT>; *Advice Letter: Damian Collins, Member of the Advisory Board, Center for Countering Digital Hate*, GOV.UK, <https://perma.cc/86H8-KJGB>; *Lord Jonny Oates*, GLOB. PARTNERS GOVERNANCE, <https://perma.cc/QG7G-GVFR>; Damian Collins, (@DamianCollins), X (July 31, 2023, 9:32 AM), <https://perma.cc/X5NS-63TE>.

<sup>24</sup> John McEvoy, *Exclusive: Labour Right Linked to Campaign to Shut Down the Canary*, CANARY, <https://perma.cc/3VH6-WNCU>.

<sup>25</sup> Emilio Casalicchio, *Trump Allies Rage at UK Labour Help for Kamala Harris. There’s More to Come*, POLITICO (Oct. 18, 2024), <https://perma.cc/8WFD-26HR>.

<sup>26</sup> See Steerpike, *Labour-Linked Censorship Group Plans to ‘Kill Musk’s Twitter’*, SPECTATOR (Oct. 23, 2024), <https://perma.cc/4BEZ-MNEA>.

<sup>27</sup> *About*, CTR. FOR COUNTERING DIGIT. HATE, <https://perma.cc/T4GA-XHNE>.

<sup>28</sup> SUSAN SCHMIDT et al., *Report on the Censorship-Industrial Complex: The Top 50 Organizations to Know*, RACKET NEWS, <https://perma.cc/U2MP-6R3J>.

allegedly published “fake news.”<sup>29</sup> CCDH UK has enlisted CCDH US and members of its board and Leadership Team to advocate for similar censorship policies in the United States, apparently to combat and change America’s culture of free speech to advance the UK Labour Party’s political and social agenda.

### III. CCDH US and Members of Its Board and Leadership Team Are Agents of Foreign Principals

Center for Countering Digital Hate Inc. (“CCDH US”) is a 501(c)(3) organization incorporated in the United States.<sup>30</sup> CCDH US was established three years after CCDH UK to expand its social media censorship campaign to the United States. CCDH US pushes the same fear campaigns to advocate for censorship in the United States that CCDH UK pushes for in the United Kingdom. The shared governance structure between CCDH US and CCDH UK shows no material separation between the two entities. At least three CCDH US board members—Imran Ahmed, Simon Clark, and Thomas Conrad Brookes—also sit on CCDH UK’s board.<sup>31</sup> A fourth board member, Kristi Jean McNeill, was on the CCDH UK’s board until July 11, 2024.<sup>32</sup>

CCDH US and CCDH UK share the same mission and reporting chain of command:

CCDH US and UK employ a large team of people who collaborate together to fulfill the shared mission of both organizations. ... CCDH US and CCDH UK share a CEO, and the Leadership Team, comprised of employees of both organizations, reports to the CEO [Imran Ahmed].<sup>33</sup>

Besides Ahmed, the Leadership Team is entirely “based in the UK and employed by CCDH UK”—not by CCDH US.<sup>34</sup> Despite not having listed any foreign donors on Schedule B of its Form 990, the evidence is that CCDH US is “directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by” CCDH UK, its board members, including current and former foreign government officials, and its United Kingdom-based and employed Leadership Team.<sup>35</sup> The two organizations make no attempt to hide their shared name, leadership, and mission

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<sup>29</sup> John McEvoy, *Exclusive: Labour Right Linked to Campaign to Shut Down the Canary*, CANARY, <https://perma.cc/3VH6-WNCU>.

<sup>30</sup> Center for Countering Digital Hate, Return of Organization Exempt From Income Tax (Form 990) (Aug. 3, 2023) (available at <https://perma.cc/R7MZ-9SUQ>).

<sup>31</sup> See Center for Countering Digital Hate, Return of Organization Exempt From Income Tax (Form 990) (Aug. 3, 2023) (available at <https://perma.cc/R7MZ-9SUQ>); *CENTER FOR COUNTERING DIGITAL HATE LTD People*, GOV.UK, <https://perma.cc/VAV3-B2PT>.

<sup>32</sup> *Kirsty Jean McNeill Personal Appointments*, GOV.UK, <https://perma.cc/6DP6-UAWS>.

<sup>33</sup> *About*, CTR. FOR COUNTERING DIGIT. HATE, <https://perma.cc/T4GA-XHNE>.

<sup>34</sup> *Id.*; cf. Center for Countering Digital Hate, Return of Organization Exempt From Income Tax (Form 990) (Aug. 3, 2023) (available at <https://perma.cc/R7MZ-9SUQ>).

<sup>35</sup> See 22 U.S.C. § 611(c)(1).

statement. Because it acts as an agent for CCDH UK and the UK Labour Party, it appears to be required to register as an agent of a foreign principal under FARA.<sup>36</sup>

Members of CCDH US's board are likewise subject to FARA registration. CCDH US Board Chair Simon Clark was a resident senior fellow at the Atlantic Council's Digital Forensic Lab,<sup>37</sup> which played a leading role in the so-called "Election Integrity Partnership" and "Virality Project" conspiracies with the federal government to censor speech on social media.<sup>38</sup> As a senior fellow at the Center for American Progress, Clark led the Center's work on combating "white supremacy" that helped shape the White House's Domestic Terrorism strategy,<sup>39</sup> which promoted a whole-of-society approach to internet censorship.<sup>40</sup> Clark appears to be required to register as a foreign agent insofar as he engages within the United States in political activities in the interests of CCDH UK and the UK Labour Party or when he represents their interests before any agency or official within the United States.<sup>41</sup>

Board member Thomas Brookes is a British national residing in Belgium.<sup>42</sup> Brookes is the CEO of the Meliore Foundation, a leading organization focused on funding global strategic communications.<sup>43</sup> He is also the CEO of the Global Strategic Communications Council, which has done work at the highest levels of the "climate change" movement, including Greta Thunberg.<sup>44</sup> Thomas Brookes must register as a foreign agent if he engages in political activities for or in the interests of CCDH UK and the UK Labour Party, or when he acts within the United States as a public relations counsel or political consultant on behalf of CCDH UK.<sup>45</sup>

Kirsty McNeill was on both CCDH US and CCDH UK's boards until July 11, 2024.<sup>46</sup> She is the Scottish Labour and Co-operative MP for Midlothian and Parliamentary Under Secretary of State for Scotland.<sup>47</sup>

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<sup>36</sup> 22 U.S.C. § 611(c).

<sup>37</sup> *Simon Clark*, ATLANTIC COUNCIL, <https://perma.cc/ZF22-6H9G>.

<sup>38</sup> *See, e.g., America First Legal Files Landmark Federal Class-Action Lawsuit Against Private Entities that Conspired With the Federal Government to Censor Speech*, AM. FIRST LEGAL (May 2, 2023), <https://perma.cc/7KNX-SRZF>.

<sup>39</sup> *Simon Clark*, Atlantic Council, <https://perma.cc/ZF22-6H9G>.

<sup>40</sup> *See AFL Files FOIA Demanding Answers About the Biden Administration's Domestic Surveillance of Americans and Collaboration with Big Tech Companies*, AM. FIRST LEGAL (July 23, 2021), <https://perma.cc/23X3-8RD3>.

<sup>41</sup> 22 U.S.C. § 611(c)(1)(i), (iv).

<sup>42</sup> *About*, CTR. FOR COUNTERING DIGIT. HATE, <https://perma.cc/T4GA-XHNE>.

<sup>43</sup> *Our Team – Leadership Team*, MELIORE FOUND., <https://perma.cc/R5K2-5U33>.

<sup>44</sup> *Tom Brookes*, POLITICO, <https://perma.cc/2GD2-7QCP>.

<sup>45</sup> 22 U.S.C. § 611(c)(1)(i), (ii).

<sup>46</sup> *See Center for Countering Digital Hate, Return of Organization Exempt From Income Tax (Form 990) (Aug. 3, 2023) (available at <https://perma.cc/R7MZ-9SUQ>); CENTER FOR COUNTERING DIGITAL HATE LTD People*, GOV.UK, <https://perma.cc/VAV3-B2PT>; *Kirsty Jean McNeill Personal Appointments*, GOV.UK, <https://perma.cc/6DP6-UAWS>.

<sup>47</sup> *Kirsty McNeill MP*, GOV.UK, <https://perma.cc/N875-RNLD>.

## A. CCDH US Engaged in Political Activities, Acted as a Public Relations Counsel on Behalf of, and Represented the Interests of its Foreign Principals

CCDH US has engaged in “political activities” — meaning 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<sup>48</sup> — for or in the interest of its foreign principals. Specifically, CCDH US has attempted to influence the Federal and State governments of the United States policies regarding content moderation (*i.e.*, censorship) on social media platforms.

Recently leaked documents show that CCDH US “set up meetings with [United States Senator] Klobuchar’s team” for “US policy engagement” and listed the following “Annual Priorities”: “Kill Musk’s Twitter”; “Advertising focus”; “Trigger EU & UK regulatory action”; and “Progress towards change in USA and support for STAR.”<sup>49</sup> The STAR Framework is CCDH US and UK’s “Global Standard for Regulating Social Media,”<sup>50</sup> and the leaked documents appear to show how CCDH US lobbies<sup>51</sup> the United States government to adopt its proposed global standard.

Those documents reveal conduct consistent with CCDH US’s past activities in the United States. On March 24, 2021, CCDH US published a list of “twelve anti-vaxxers who play a leading role in spreading digital misinformation about Covid vaccines,” and urged social media platforms to “establish a clear threshold for enforcement action” and “to deplatform the most highly visible repeat offenders, who we [CCDH] term the Disinformation Dozen.”<sup>52</sup> This included former presidential candidate and President Donald J. Trump endorser Robert F. Kennedy Jr.<sup>53</sup>

On the same day that CCDH US published its report on the “Disinformation Dozen” — March 24, 2021 — twelve Democratic state attorneys general sent a letter to

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<sup>48</sup> 22 U.S.C. 611(o).

<sup>49</sup> Steerpike, *Labour-Linked Censorship Group Plans to ‘Kill Musk’s Twitter’*, SPECTATOR (Oct. 23, 2024), <https://perma.cc/4BEZ-MNEA>.

<sup>50</sup> STAR FRAMEWORK, CTR. FOR COUNTERING DIGIT. HATE (Sept. 2022), <https://perma.cc/436L-QTZU>.

<sup>51</sup> See, e.g., Center for Countering Digital Hate, Return of Organization Exempt From Income Tax, at 3 (Form 990) (Aug. 3, 2023) (available at <https://perma.cc/R7MZ-9SUQ>) (disclosing \$43,037 of lobbying expenditures for “Direct contact with legislators, their staffs, government officials, or a legislative body”).

<sup>52</sup> CCDH, THE DISINFORMATION DOZEN: WHY PLATFORMS MUST ACT ON TWELVE LEADING ONLINE ANTI-VAXXERS at 5, <https://perma.cc/4C86-PKE3>.

<sup>53</sup> *Id.* at 14.

Twitter and Facebook citing CCDH’s work and calling on them to “effectively root[] out fraudulent information about coronavirus vaccines.”<sup>54</sup>

Notably, AFL’s investigation has uncovered that over a week before, on March 16, 2021, Rowan Kane, Counselor to the Connecticut Attorney General and Deputy Director of Policy, had circulated an earlier draft of the letter citing the CCDH US report before the report was published.<sup>55</sup> Moreover, he asked the other state attorneys general offices for “confirmation of sign-on by COB Tuesday, 3/23” — *i.e.*, the day before the report would be published. The evidence suggests that CCDH US provided a non-public version of its report to the Connecticut Attorney General’s Office before its final publication and potentially coordinated with that office in drafting the letter. AFL’s investigation also uncovered that some or all of the letter’s signatories have launched a “multistate” “law enforcement matter handled jointly by various state attorneys general.”<sup>56</sup>

CCDH also appeared to have leveraged its “Disinformation Dozen” report in a public relations campaign before the Biden-Harris White House. CCDH US board member Aleen Keshishian is the founder and CEO of Lighthouse Management + Media, a firm that represents many celebrities, including Jennifer Aniston, Selena Gomez, and Olivia Rodrigo.<sup>57</sup> CCDH US board member Zack Morgenroth is a managing partner at Lighthouse Management + Media.<sup>58</sup> Their client, Olivia Rodrigo, spoke at the White House on July 14, 2021, to encourage young people to get vaccinated against COVID-19.<sup>59</sup> White House director of digital strategy Rob Flaherty, who organized the event, stated, “[t]here’s only so much we as a White House can do to stop misinformation ... What we can do is go on offense.”<sup>60</sup> The next day, White House Press Secretary Jen Psaki stated that the Biden-Harris White House was “flagging problematic posts for Facebook,” and implied that the “12 people who are producing 65 percent of anti-vaccine misinformation [should not] remain active on Facebook.”<sup>61</sup>

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<sup>54</sup> Letter from William Tong, Att’y Gen. of Conn. et al., to Jack Dorsey, Chief Executive Officer, Twitter, Inc., and Mark Zuckerberg, Chairman & Chief Executive Officer, Facebook, Inc. (Mar. 24, 2021), <https://perma.cc/4RHY-EPTQ>.

<sup>55</sup> Email from Rowan Kane, Couns. to the Att’y Gen. & Deputy Dir. of Pol’y, Off. of the Att’y Gen. (Mar. 16, 2021, 1:54 PM), <https://perma.cc/9EGQ-CHE3>.

<sup>56</sup> *America First Legal Launches Follow-up Investigation After Massachusetts Attorney General’s Office Withholds Censorship Records*, AM. FIRST LEGAL, <https://perma.cc/W7BF-39SR>.

<sup>57</sup> *Aleen Keshishian*, IMDB, <https://perma.cc/M328-455Y>; see Center for Countering Digital Hate, Return of Organization Exempt From Income Tax (Form 990) (Aug. 3, 2023) (available at <https://perma.cc/R7MZ-9SUQ>).

<sup>58</sup> See Center for Countering Digital Hate, Return of Organization Exempt From Income Tax (Form 990) (Aug. 3, 2023) (available at <https://perma.cc/R7MZ-9SUQ>); *Zack Morgenroth – Entertainment Executive*, VARIETY, <https://perma.cc/YQ58-W52R>.

<sup>59</sup> Kate Sullivan, *Pop Star Olivia Rodrigo Visits White House to Urge Young People to get Vaccinated Against Covid-19*, CNN, <https://perma.cc/NW7P-W8P8>.

<sup>60</sup> Katie Rogers, *At the White House, Olivia Rodrigo Says Vaccines Are ‘Good 4 U,’* N.Y. TIMES (July 14, 2024), <https://perma.cc/D4RP-MTXZ>.

<sup>61</sup> *Press Briefing by Press Secretary Jen Psaki and Surgeon General Dr. Vivek H. Murthy*, WHITE HOUSE, <https://perma.cc/B9QY-J2FC>.



The timing of these events indicates that CCDH US board members were involved in discussions at the White House advocating for the deplatforming of the individual Americans marked for censorship by CCDH US.<sup>62</sup> Insofar as Aleen Keshishian and Zack Morgenroth “directly or indirectly” engaged in “informing, advising, or in any way representing” CCDH UK or the UK Labour Party “in any public relations matter pertaining to” their interests and policies regarding internet censorship, they also appear to be required to register as foreign agents.<sup>63</sup>

CCDH US has also taken credit for causing Google to change its advertising policies in support of censorship.<sup>64</sup> Such demonetization tactics in the United States followed CCDH UK’s success in the United Kingdom.<sup>65</sup>

AFL’s investigation has also uncovered that CCDH US represented the interests of its foreign principals before the highest levels of the Biden-Harris Administration. On or around March 29, 2022, Robert Silvers — the DHS Under Secretary for Strategy, Policy, and Plans who co-chaired the short-lived Disinformation Governance Board with Nina Jankowicz — connected with CCDH’s then-Head of Policy, Eva Hartshorn-Sanders, via LinkedIn.<sup>66</sup> On March 29, 2022, Eva Hartshorn-Sanders emailed Robert Silvers “to meet to discuss research that [CCDH] released and coming up in the next couple of weeks, and ... to hear about work that [DHS] ha[s] underway, including more about the strategies and plans that [the DHS] team have developed.” Eva also invited Robert to CCDH’s Global Summit and Changemakers Dinner. By June 16, 2022, a White House Task Force to Address Online Harassment and Abuse was established under the leadership of the Director of the White House Gender Policy Council and the Assistant to the President for National Security Affairs. By September 23, 2022, CCDH was directly meeting with officials from the White House, the NSC, and the Department of State’s Bureau of Counterterrorism (CT), updating them with CCDH’s latest findings.<sup>67</sup>

On September 30, 2022, CCDH formally submitted its research and policy recommendations on technology-facilitated gender-based violence to the White House Task Force. Its submission highlighted how CCDH “studied the way anti-vaccine extremists, hate actors, climate change deniers, and misogynists weaponize platforms to spread lies and attack marginalized groups” and developed policy and legislation to “ensure that social media platforms meet [CCDH’s framework] for

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<sup>62</sup> *Contra* Center for Countering Digital Hate, Return of Organization Exempt From Income Tax (Form 990) (Nov. 14, 2022) (available at <https://perma.cc/AVC3-ZWK4>) (no lobbying expenditures disclosed for the 2021 calendar year).

<sup>63</sup> See 22 U.S.C. § 611(g).

<sup>64</sup> @CCDHate, X (Mar. 30, 2023, 6:05 AM), <https://tinyurl.com/3985kemf>.

<sup>65</sup> See McEvoy, *supra* note 19.

<sup>66</sup> *Government Documents Confirm the Biden Administration’s Mobilization of U.S. Counterterrorism Assets to Support Imran Ahmed’s Global Censorship Campaign*, AM. FIRST LEGAL, <https://perma.cc/2KJT-AJ5G>.

<sup>67</sup> *Id.*

addressing digital hate and disinformation, embedding Safety by Design, Transparency requirements (on algorithms, rules enforcement, and economics), Accountability and Responsibility.”<sup>68</sup>

On March 3, 2023, the White House published its *Initial Blueprint for the White House Task Force to Address Online Harassment and Abuse*. The Blueprint highlighted federal research funding, “Digital Equity” grants, Department of Education guidance to be issued to colleges, and an FTC enforcement action against a gaming platform. Eva Hartshorn-Sanders said CCDH was “able to feed in research and policy recommendations for its development.”<sup>69</sup>

In addition to her lead policy role at CCDH, Eva Hartshorn-Sanders separately provided “[l]eading Government advice on the response to the March 15 terrorist attacks on Christchurch mosques.”<sup>70</sup> Insofar as Eva Hartshorn-Sanders intended to “in any way influence any agency or official of the Government of the United States” regarding internet censorship “for or in the interests of” CCDH UK or the UK Labour Party, she would be required to register as a foreign agent representing a foreign agent.<sup>71</sup>

As an agent for the CCDH UK and the UK Labour Party, CCDH US engaged in political activities and acted as a public relations counsel in the United States to advance the interests of its foreign principals, advocating for the censorship of free speech on the internet.<sup>72</sup> CCDH US represented their interests before the state and Federal governments of the United States.<sup>73</sup> Accordingly, it appears to be required to register under FARA.<sup>74</sup>

## **B. Imran Ahmed Must Register as a Foreign Agent**

Imran Ahmed is the CEO of CCDH US and CCDH UK<sup>75</sup> and appears to be required to register as a foreign agent under FARA. Ahmed once worked for Stop Funding Fake News (“SFFN”), which was later folded into CCDH.<sup>76</sup> There, he took credit for a so-called “defund racism” campaign associated with Black Lives Matter to force Google to remove their ads from The Federalist and ZeroHedge.<sup>77</sup> Ahmed has called

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<sup>68</sup> *Id.*

<sup>69</sup> *Id.*

<sup>70</sup> *Id.*

<sup>71</sup> See 22 U.S.C. § 611(c)(i), (o).

<sup>72</sup> 22 U.S.C. § 611(c)(1)(i), (ii).

<sup>73</sup> 22 U.S.C. § 611(c)(1)(iv).

<sup>74</sup> 22 U.S.C. § 612.

<sup>75</sup> *About*, CTR. FOR COUNTERING DIGIT. HATE, <https://perma.cc/T4GA-XHNE>.

<sup>76</sup> See *Stop Funding Fake News*, INFLUENCEWATCH, <https://perma.cc/8NVE-UXF6>.

<sup>77</sup> *Stop Funding Misinformation*, CTR. FOR COUNTERING DIGIT. HATE (July 20, 2020), <https://perma.cc/8ELV-FSMB>; Imran Ahmed (@Imi\_Ahmed), X (June 16, 2020, 3:30 PM), <https://perma.cc/9UQ8-TNHD>.

for Google to censor pro-life groups, stating, “Google and the anti-choice movement must not be allowed to continue to betray Americans seeking reproductive healthcare.”<sup>78</sup> These campaigns were just a drop in the bucket. Imran Ahmed openly celebrates and fights for the same censorship in the United States that he advocates for abroad.

On November 21, 2020, Ahmed voiced concerns on the platform urging the removal of “serial offenders” who repeatedly share information that he deemed to be spreading “anti-vaccine misinformation.”<sup>79</sup> On April 24, 2021, Ahmed announced a campaign by CCDH to shut down Instagram accounts that were spreading “vaccine misinformation.”<sup>80</sup> On May 28, 2023, Ahmed criticized anti-vaccine advocates, calling them “parasites, lining their own pockets through the sale of supplements, subscriptions, and false cures, while deceiving innocent people. It’s time they paid back their ill-gotten gains.”<sup>81</sup>

Ahmed was angered by YouTube’s policy shift not to censor discussions about the 2020 election being stolen. He called the decision misguided and stated that “American democracy itself cannot survive a wave of disinformation,”<sup>82</sup> showing his political bias in American politics. Ahmed’s statement apparently aligns with the UK Labour Party’s bias within American politics, as it is deploying over 100 staffers to influence the US Presidential election in favor of the Democratic candidate, Kamala Harris.<sup>83</sup>

Ahmed advocated for excluding news sources that do not align with the far-left climate change agenda from Google’s platform. “The Daily Wire ad buys appear to be a direct contradiction of Google’s own promises to promote reliable information on the climate crisis: ‘Google has rules against their search ads being used to spread disinformation, they should be enforcing them, even against people who give them lots of money.’”<sup>84</sup>

Ahmed encouraged advertisers to leave X over alleged “anti-LGBTQ+ hatred.”<sup>85</sup> On June 27, 2023, he retweeted an event he was part of, which was organized by Digital EU. The event focused on “how social media companies will need to adapt to survive.”

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<sup>78</sup> Simone Shah, *Google Got More Than \$10 Million for Ads That Mised People Seeking Abortions*, TIME, <https://perma.cc/4KUG-6CM5>; *Google Is Making Millions of Dollars From Ads for Fake Abortion Clinics: Report*, VICE NEWS, <https://perma.cc/8PPA-RRL6>.

<sup>79</sup> Imran Ahmed, (@Imi\_Ahmed), X (Nov. 21, 2020, 7:37 AM), <https://perma.cc/M9P4-H3JS>.

<sup>80</sup> Imran Ahmed, (@Imi\_Ahmed), X (Apr. 24, 2021, 10:00 AM), <https://perma.cc/8GAQ-3MUL>.

<sup>81</sup> Imran Ahmed, (@Imi\_Ahmed), X (May 28, 2023, 9:21 PM), <https://perma.cc/3W24-6FQV>.

<sup>82</sup> *Fundamentally Dangerous Reversal of Social Media Guardrails Could Prove Disastrous for 2024 Elections*, GUARDIAN, <https://perma.cc/P9FE-2YKL>.

<sup>83</sup> Lee Cohen, *Labour Can’t Help Kamla Harris*, SPECTATOR, <https://perma.cc/4QBZ-QB7X>.

<sup>84</sup> *Google Let Daily Wire Advertise on ‘Climate Change Is a Hoax,’* GUARDIAN, <https://perma.cc/G8GU-UULB>.

<sup>85</sup> Imran Ahmed, (@Imi\_Ahmed), X (June 9, 2023, 1:24 PM), <https://perma.cc/ZE6V-GNKE>.

The picture included in the tweet features a slide regarding “right-wing extremism and the gaming industry” and the “link between hate speech and violent extremism.”<sup>86</sup>

Ahmed pressures American companies and the United States government to censor speech he disagrees with in violation of the First Amendment to advance the interests of CCDH UK and the UK Labour Party. His connections with the UK Labour Party run even deeper, as he is the only employee of Labour Campaigns Limited, an organization that helps coordinate Labour parliamentary campaigns.<sup>87</sup>

#### **IV. Conclusion**

Based on the evidence, AFL believes that CCDH US and members of its board and Leadership Team may have an obligation to register as agents of a foreign principal. We ask that you conduct an appropriate investigation. Thank you for your consideration.

Respectfully submitted,

/s/ Gene Hamilton  
Executive Director  
America First Legal Foundation

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<sup>86</sup> Imran Ahmed, (@Imi\_Ahmed), reposted Center for Countering Digital Hate, (@CCDHate), X (June 27, 2023, 11:26 AM), <https://perma.cc/DVA5-KTY9/>.

<sup>87</sup> See *LABOUR CAMPAIGNS LIMITED People*, GOV.UK, <https://perma.cc/77GP-KZQD>.