



Reston Translator

November 15, 2017

Heather H. Hunt, Chief
FARA Registration Unit
National Security Division
U.S. Department of Justice
600 E Street, NW
Washington, DC 20530

Re: Reston Translator LLC

Dear Chief Hunt:

Reston Translator LLC is in receipt of your letter dated September 12, 2017 (the "DOJ Letter") regarding the Foreign Agents Registration Act of 1938, as amended, 22 USC Sections 611-621 ("FARA" or the "Act"). As later communicated to you and as detailed below, Reston Translator LLC does not believe it has the obligation to register under the provisions of FARA. Nonetheless, given that the DOJ has informed Reston Translator LLC that it will be considered to be in non-compliance with FARA with the DOJ considering the full range of its legal authorities to effectuate compliance, Reston Translator LLC is complying, and submitting its FARA registration.

The DOJ letter states that Reston Translator LLC is a "publicity agent" and "information-service employee" as defined by the Act. As shown below, under the definition of "agent of a foreign principal" contained in Section 611(c) of the Act, that statement is incorrect.

A. BACKGROUND

Reston Translator LLC is a Virginia limited liability company owned by two US citizens, and is licensed by the Federal Communications Commission (the "FCC") to operate a radio transmission facility (W288BS, Reston, Virginia) on the radio frequency of 105.5 MHz that broadcasts FM radio programming to a portion of the Washington, DC area. Under the rules and regulations of the FCC, Reston Translator LLC may accept compensation for the carriage of a primary station's programming in a sale of radio broadcast time. This sale of broadcast time is analogous to the procedure utilized by many commercial radio stations in selling long-form advertising time. Reston Translator LLC has an agreement (the "Agreement") referenced in your DOJ Letter and submitted with this registration in which radio broadcast time is sold to the Federal State Unitary Enterprise Rossiya Segodnya ("Rossiya Segodnya") in exchange for certain consideration.

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B. THE ACT

Reston Translator LLC does not disagree that Rossiya Segodnya appears to be a "foreign principal" as defined in Section 611(b), and that both it and Reston Translator LLC are each a "person" as defined in Section 611(a) of the Act.

To be either a "publicity agent" or an "information-service employee" as defined by the Act, however, a "person" who conducts business with a "foreign principal" must also meet the definition in Section 611(c) of an "agent of a foreign principal". Section 611(c) was only quoted in part in your September 12, 2017 letter. When Section 611(c) is read in its entirety with its definitions, it is evident that Reston Translator LLC is not an "agent of a foreign principal" as it does not meet the required elements set forth in the Act.

Section 6.11(c) of the Act in full defines an "agent of a foreign principal" as:

(c) Except [Except] as provided in subsection (d) of this section, the term "agent of a foreign principal" means--

(1) 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 any other person--

(i) engages within the United States in political activities for or in the interests of such foreign principal;

(ii) acts within the United States as a public relations counsel, publicity agent, information-service employee or political consultant for or in the interests of such foreign principal;

(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; or

(iv) within the United States represents the interests of such foreign principal before any agency or official of the Government of the United States; and

(2) any person who agrees, consents, assumes or purports to act as, or who is or holds himself out to be, whether or not pursuant to contractual relationship, an agent of a foreign principal as defined in clause (1) of his subsection.

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C. RESTON TRANSLATOR LLC IS NOT AN AGENT, REPRESENTATIVE, EMPLOYEE OR SERVANT, NOR ACTING AT THE ORDER, REQUEST, OR UNDER THE DIRECTION OR CONTROL, OF A FOREIGN PRINCIPAL

The Act requires registration of any party acting as an agent, representative, employee or servant of Rossiya Segodnya, or that is acting at the order, request, or under the direction or control, of a foreign principal. There is nothing in the Agreement, or the conduct of Reston Translator LLC in selling radio broadcast time to Rossiya Segodnya, however, that even suggests that Reston Translator LLC, or its members, employees, contractors or others associated with it, are either an "agent", a "representative", an "employee" or a "servant", or acting at the order, request, or under the direction or control, of Rossiya Segodnya. A commercial transaction in which radio broadcast time is sold to a third-party does not put the seller of that broadcast time into the legal position of an "agent", a "representative", an "employee" or a "servant", or acting at the order, request, or under the direction or control, of the radio time buyer.

Notably, there is little case law that is instructive on the meaning of the terms "agent", "representative", "employee", and "servant" and the definitions of "order", "request", or "under the direction or control" as used in Section 611(c)(1) of the Act. At most, courts have opined on whether to be an "agent", the definition of "agent" in the Restatement of Agency, Section 1 controls.

In United States v. German-American Vocational League, Inc., 153 F.2d 860 (3rd Cir. 1946), admitted sympathizers with the German Reich during World War II were charged with conspiracy to violate FARA (referred to also as "The McCormick Act") by publishing a newspaper and other propaganda activities. The defendants claimed that the government failed to prove a contract of employment between them and the German principals which was argued as a prerequisite for a finding of "agency". The court found that FARA was satisfied stating that:

[t]he true test ... was whether agency in fact existed, with the term agency defined substantially as in the Restatement of Agency, Section I, which states it to be: "The relationship which results from the manifestation of consent by one person to another that the other shall act on his behalf and subject to his control, and consent by the other to so act". 153 F. 2nd at 868.

Conversely, Attorney Gen. of United States v. Irish Northern Aid Committee, 668 F.2d 159, 160 (2nd Cir. 1982), in a suit to compel the defendant to comply with FARA provisions, the court in that circuit held that the defendant was an "agent of a foreign principal" under FARA, agreeing with the lower court that "the agency relationship sufficient to require registration need not ... meet the standard of the Restatement (Second) of Agency with its focus on 'control' of the agent by the principal". The 2nd Circuit stated in what can only be described as redundantly circular reasoning that:

In determining agency for purposes of the Foreign Agents Registration Act, however, our concern is not whether the agent can impose liability upon his principal but whether the relationship

warrants registration by the agent to carry out the informative purposes of the Act (emphasis added).

So, to determine whether one is an agent, the test under Attorney Gen. of United States v. Irish Northern Aid Committee is whether whatever an otherwise undefined person is doing no matter where he is doing it or why and no matter what relationship that person has or does not have to any foreign principal, she is deemed an "agent" if by designating that person as such is warranted by the government to carry out the informative purposes of the Act. This guts any definitive meaning to the term "agent" as used in Section 611(c)(1). Under this test, the government would simply need to show that one of the four categories of actions set forth in Subsections 611(c)(1)(i)-(iv) took place, ignoring the word "and" in the phrase "and who directly or through any person ...".

Fortunately, the circular definition of "agent" in Attorney Gen. of United States v. Irish Northern Aid Committee appears to be dicta as the 2nd Circuit held that FARA registration was required by a person who acts at a foreign principal's "request" thus satisfying one of the other criteria in Section 611(c)(1) which the court defined as something "between a command and a plea". 668 F.2d at 165. The lower court in Attorney Gen. of United States v. Irish Northern Aid Committee, 530 F. Supp. 241, 256 (S.D.N.Y. 1981) in reviewing the evidence found that the defendant's writings in numerous letters "support the uncontroverted assertion that the defendant is a representative of, or so acts at the request of, the IRA" thus satisfying the clear "representative" criteria for being a FARA Act defined "Agent of a Foreign Principal".

Reston Translator LLC is not acting at the "request" of Rossiya Segodnya any more than an internet service provider acts at the "request" of a customer who is a foreign principal that "requests" (contracts for) a broadband connection which that customer then uses to engage in speech that is not illegal but speech that may not be preferred by our government. The only request acceded to by Reston Translator LLC was to accept an offer to make its facilities available for the carriage of speech and other content with stated contractual provisions that the content not be illegal or otherwise deemed against the public interest.

Two other cases, Rabinowitz v. Kennedy, 376 U.S. 605 (1964) and United States v. Zarrab, 2017 U.S. Dist. LEXIS 51762 (S.D.N.Y. 2017), only obliquely refer to the issue of defining what is an agent, representative, employee or servant for the purposes of FARA. Rabinowitz v. Kennedy litigated whether attorneys representing the Republic of Cuba "representing" a foreign government in litigation must register under the Act. In Rabinowitz v. Kennedy the attorneys clearly admitted they were "representatives" under the Act with the only question being whether they fell within a stated exemption. FARA and Section 601(c)(1) was implicated in United States v. Zarrab only in the context of an evaluation of the legal conflicts of a law firm who registered under FARA with respect to another client.

The one case that is most on point to the definitions of "at the order, request, or under the direction or control, of a foreign principal" in Section 611(c)(1) is a case in which the United States apparently declined to be heard (according to footnote 23). In Michele Amoruso E. Figli v. Fisheries Development Corp., 499 F.Supp. 1074 (S.D.N.Y. 1980), an agreement between U. S. citizens and Italian citizens in a venture in which each owned a portion of the entity was

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litigated. One of the predominant claims made was that the U.S. citizen defendants violated FARA by each being an "agent of a foreign principal" and failing to register for activities promoting favorable legislation that would benefit the foreign nation. The allegation was that defendants were the Italian citizen's agents because they acted at the request of, were financed by, and were subsidized by the Italian citizens, and engaged in U.S. political activities on behalf of the Italian citizens. The court, citing the FARA regulations contained in 28 C.F.R. Section 5.100(b), found that to have "control", either directly or indirectly under FARA, there must be "the possession or the exercise of the power, directly or indirectly, to determine the policies or the activities of a person, whether through the ownership of voting rights, by contract or otherwise". Because the U.S. citizens both had majority ownership, and were managing partners, a lack of "control" sufficient to require FARA registration was found. Likewise, the court found that the requirement that the Italian citizens make capital contributions to the entity did not evidence direction or control stating that "[e]ven the receipt of a bona fide subsidy from a foreign source does not render the recipient an agent of that source as long as the recipient is not subject to foreign direction or control".

It is instructive that the lower court in Attorney Gen. of United States v. Irish Northern Aid Committee, cited above, at 530 F. Supp. at 256, stated that:

the Act is not intended to cover "persons who are not, in fact agents of foreign principals but whose acts may incidentally be of benefit to foreign interests, even though such acts are part of the normal exercise of those persons' own right of free speech, petition or assembly" (citing H.R. Rept.No. 1470, 89th Cong. 2nd Sess., reprinted in (1966) U.S.Code Cong. & Ad.News 2397, 2401).

Reston Translator LLC, in selling radio broadcasting time, is doing exactly that – exercising its normal right of free speech. Whether or not the Restatement definition of "agent" is followed, the only relationship between Reston Translator LLC and Rossiya Segodnya is as seller and buyer of radio broadcast time with Reston Translator LLC being the seller and Rossiya Segodnya being the buyer. A seller-buyer relationship does not create agency. Reston Translator LLC is not an agent of Rossiya Segodnya by agreeing to sell broadcast time.

A more complete recitation of the portion of the legislative history cited above to the 1966 FARA amendment is instructive to the definition of an "agent of a foreign principal" at issue here for Reston Translator LLC. H.R. Rept.No. 1470, 89th Cong. 2nd Sess., reprinted in (1966) U.S.Code Cong. & Ad.News 2397, 2401) states that:

The proposed amendment would, however, make clear that the Justice Department must establish as a first step in requiring registration than an agency relationship exists. Under existing law it is possible because of the broad scope of the definitions contained in section 1(c) to find an agency relationship (and thus the possibility of registration) of persons who are not, in fact, agents of foreign principals but whose acts may incidentally be of benefit to foreign interests, even though such acts are part of the

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normal exercise of those persons' own rights of free speech, petition, or assembly. This may have been desirable under conditions which existed when the Foreign Agents Registration Act was amended in 1942, but does not appear warranted in present circumstances (emphasis added).

The DOJ letter, by primarily focusing on the content-related aspects of the Act, exemplifies that the government can easily overstep its constitutional bounds in enforcing FARA. It has never been accepted in our country that our government should be the arbiter of good and bad ideas, requiring those who may participate in the sale of radio broadcast time containing ostensibly bad ideas to register. But that is what is being required of Reston Translator LLC – a selective governmental registration based upon the content of what is being carried by its radio station, even though there is no Section 611(c) “agent of a foreign principal” relationship between Reston Translator LLC and Rossiya Segodnya.

D. RESTON TRANSLATOR LLC IS NOT 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

The alternative argument may be that Reston Translator LLC must be “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”. Notably, however, Section 611(c)(1) appears to refer to such a person as the intermediary between the “foreign principal” and the “agent of the foreign principal” so that the foreign principal and the purported agent of a foreign principal cannot escape the FARA registration obligation by interposing someone between them.

Notwithstanding that, in the event that the argument is made, Reston Translator LLC is likewise not “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”.

Neither Section 611 nor any other portion of FARA specifically defines the terms “supervised”, “directed”, “controlled”, “financed”, or “subsidized”. The only case law speaking to “control” and “financed” appears to be Michele Amoruso E. Figli v. Fisheries Development Corp., 499 F.Supp. 1074 (S.D.N.Y. 1980) cited above which defined the terms “control”, “finance” and “subsidize” on a factual basis within the confines of the controversy presented.

Past the cursory guidance given in Michele Amoruso E. Figli v. Fisheries Development Corp., the terms “supervised”, “directed”, “controlled”, “financed”, or “subsidized” must be deemed to have their commonly-understood dictionary meanings (all definitions from the Merriam-Webster dictionary):

- “Supervised” - “to be in charge of (someone or something): to watch and direct (someone or something)”. Under the Agreement, Rossiya Segodnya has no right “to be in charge of” Reston Translator LLC or its activities. Rather, Reston Translator LLC has agreed to furnish radio broadcasting time in exchange for stated

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compensation – a strictly commercial transaction. The activities of Reston Translator LLC are and will remain solely “supervised” by its owners.

- “Directed” – “subject to supervision or regulation”. Analogous to the definition of supervised. Rossiya Segodnya has no right supervise or regulate Reston Translator LLC or its activities.
- “Controlled” – “restrained”. Again, analogous to the definitions of supervised and directed, Rossiya Segodnya has no right to restrain Reston Translator LLC or its activities.
- “Financed” – “the obtaining of funds or capital”. Reston Translator LLC is not “obtaining” funds or capital from Rossiya Segodnya. Rather, simple monetary consideration is being paid by Rossiya Segodnya and received by Reston Translator LLC in exchange for Reston Translator LLC providing radio broadcast time in a routine commercial transaction.
- “Subsidized” – “to help someone or something pay for the costs of (something)”. Reston Translator LLC is not receiving any help, assistance, aid, benefit, succor or backing from Rossiya Segodnya.

In a more general sense, each of the terms “supervised”, “directed”, “controlled”, “financed”, and “subsidized” suggest either a respondeat-superior relationship such as a master-servant, employer-employee, or debtor-creditor relationship. The relationship between Reston Translator LLC and Rossiya Segodnya is rather a seller-buyer relationship of radio broadcast time. No master-servant, employer-employee, or debtor-creditor relationship is created or implied by the sale of radio broadcast time under the Agreement. If the Act is read to cover buyer-seller relationships, then every person located in the United States that has any contact whatsoever with any foreign principal (as defined in the Act) engaging in the Section 611(c)(1)(i)-(iv) activities would be subject to the expense, burden and peril of registration under the Act. This broad net would clearly implicate significant First Amendment concerns as the DOJ’s enforcement of the Act would, through its onerous provisions, indirectly restrict the speech of United States citizens which the DOJ could not otherwise restrict directly.

E. CONCLUSION

Reston Translator LLC is not 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. Therefore, Reston Translator LLC under Section 611(c)(1) is not an “agent of a foreign principal” irrespective of the clauses in Subsections 611(c)(i)-(iv) cited in the DOJ Letter.

To be regarded as a defined “agent of a foreign principal”, Reston Translator would have to fulfill the requirement of being 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,

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controlled, financed, or subsidized in whole or in major part by a foreign principal and fulfill one of the Subsections 611(c)(i)-(iv) clauses.

Since Reston Translator LLC does not fulfill the requirement of being an agent of a foreign principal, the clauses in Subsections 611(c)(i)-(iv) are inapplicable. Or more simply put, falling under one or more of the clauses in Subsections 611(c)(i)-(iv) does not make a person an "agent of a foreign principal" without also being 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.

The FARA statute was adopted long prior to the proliferation of media sources now available to the general public. There is a significant argument that the exclusionary provisions of Section 611(d) should have also been applicable to radio and television broadcast stations, and all other newer forms of media, given the various later interpretations of our First Amendment. Section 611(d) specifically refers as an exclusion to the definition of "agent of a foreign principal" for publications provided that such publications are "not owned, directed, supervised, controlled, subsidized, or financed, and none of its policies are determined by any foreign principal defined in subsection (b) of this section, or by any agent of a foreign principal required to register under this subchapter". Reston Translator LLC, and its ownership and operations of its radio stations, is neither owned, directed, supervised, controlled, subsidized or financed by any foreign principals nor are its policies determined by any foreign principal or agent of a foreign principal.

Reston Translator LLC appreciates the role of the Department of Justice, National Security Division, in carrying out the purposes of FARA and informing the American public of the activities of agents working for foreign principals to influence U.S. Government officials or the American public with reference to the domestic or foreign policies of the United States, or with reference to the political or public interests, policies, or relations of a foreign country or a foreign political party. Reston Translator LLC further acknowledges that you and your National Security Division may have significant questions as to the activities of Rossiya Segodnya in our United States.

The news, information, entertainment and other content, however it may be characterized, within the radio broadcast time purchased by Rossiya Segodnya on W288BS is available for reception, review and critique by all persons owning a simple FM radio receiver within the W288BS broadcast area who wish to listen and judge for themselves. The purchased radio broadcast time has inserted within an hourly sponsorship identification required by the FCC that states:

Programming paid for and furnished by the Federal State Unitary
Enterprise Rossiya Segodnya International Information Agency
through Reston Translator LLC.

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The radio broadcast content identifies itself as Radio Sputnik which is an obvious and transparent reference to its source. Accordingly, even though Reston Translator LLC does not fall within the definitions of Section 611(c), the FARA purpose of informing the American public of the source of the purchased broadcast time on W288BS is being fulfilled.

Reston Translator LLC does not qualify for registration under the Act, but is doing so at your direction. We do so because we have been directed to do so, not because it is required by the law. We do so without admission or waiver, but in direct response to the DOJ mandate.

Sincerely,

RESTON TRANSLATOR LLC

By


John F. Gatziglia
Managing Member

OMB NO. 1124-0001; Expires February 28, 2014

U.S. Department of Justice
Washington, DC 20530

Registration Statement
Pursuant to the Foreign Agents Registration Act of 1938, as amended

I-REGISTRANT

1. Name of Registrant

Reston Translator, LLC

2. Registration No.

6490

3. Principal Business Address

[Redacted]

4. If the registrant is an individual, furnish the following information:

(a) Residence address(es)

(b) Other business address(es), if any

(c) Nationality

(d) Year of birth

(e) Present citizenship

(f) If present citizenship not acquired by birth, state when, where and how acquired

(g) Occupation

5. If the registrant is not an individual, furnish the following information:

(a) Type of organization: Committee Association Partnership Voluntary group
Corporation Other (specify) Limited Liability Co.

(b) Date and place of organization April 13, 2006

(c) Address of principal office [Redacted]

(d) Name of person in charge John F. Garziglia

(e) Locations of branch or local offices None

(f) If a membership organization, give number of members n/a

Formerly CRM-153

FORM NSD-1
Revised 03/11

(g) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

Name	Residence Address(es)	Position	Nationality
John F. Garziglia	[REDACTED]	Managing Member	US

(h) Which of the above named persons renders service directly in furtherance of the interests of any of the foreign principals?

None

(i) Describe the nature of the registrant's regular business or activity.

Operation of FM translator radio broadcasting facility

(j) Give a complete statement of the ownership and control of the registrant.

John F. Garziglia - Member 51% Equity and Control

Barbara G. Garziglia - Member - 49% Equity and Control

6. List all employees who render services to the registrant directly in furtherance of the interests of any of the foreign principals in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address(es)	Nature of Services
None		

II--FOREIGN PRINCIPAL

7. List every foreign principal¹ for whom the registrant is acting or has agreed to act.

Foreign Principal	Principal Address(es)
The registrant is not acting nor has registrant agreed to act for any foreign principal. The registrant has sold radio broadcast time to the Federal State Unitary Enterprise Rossiya Segodnya International Information Agency	Zubovskij blvd, 4, Moscow, Russia, 119021

III--ACTIVITIES

8. In addition to the activities described in any Exhibit B to this statement, will you engage or are you engaging now in activity on your own behalf which benefits any or all of your foreign principals? Yes No

If yes, describe fully.

IV--FINANCIAL INFORMATION**9. (a) RECEIPTS-MONIES**

During the period beginning 60 days prior to the date of your obligation to register² to the time of filing this statement, did you receive from any foreign principal named in Item 7 any contribution, income, or money either as compensation or for disbursement or otherwise? Yes No

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.³

Foreign Principal	Date Received	Purpose	Amount
Federal State Unitary Enterprise Rossiya Segodnya International Information Agency	6/14/2017	Purchase of radio broadcast time	\$90,000
Federal State Unitary Enterprise Rossiya Segodnya International Information Agency	9/20/2017	Purchase of radio broadcast time	\$90,000
			\$180,000
			Total

¹ The term "foreign principal" includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual.

² An agent must register within ten days of becoming an agent, and before acting as such.

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. There is no printed form for this exhibit. (See Rule 201(e)).

(b) RECEIPTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of your obligation to register⁴ to the time of filing this statement, did you receive from any foreign principal named in Item 7 anything of value⁵ other than money, either as compensation, or for disbursement, or otherwise? Yes No

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
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10. (a) DISBURSEMENT-MONIES

During the period beginning 60 days prior to the date of your obligation to register⁶ to the time of filing this statement, did you spend or disburse any money in furtherance of or in connection with your activities on behalf of any foreign principal named in Item 7? Yes No

If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
6/28, 7/28, 8/23 & 9/15/2017	Radio One Licenses, LLC	HD Station	\$7,000 each
10/16/2017	iHeartMedia	HD Station	\$5,482.26
10/31/2017	iHeartMedia	HD Station	\$9,166.67

(b) DISBURSEMENTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of your obligation to register⁷ to the time of filing this statement, did you dispose of any thing of value⁸ other than money in furtherance of or in connection with your activities on behalf of any foreign principal named in Item 7? Yes No

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During the period beginning 60 days prior to the date of your obligation to register⁹ to the time of filing this statement, did you, the registrant, or any short form registrant, make any contribution of money or other thing of value from your own funds and on your own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes No

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
9/26/2017	\$100	Jennifer Wexton - Democratic Candidate for VA-10	n/a

4, 6, 7 and 9 See Footnote 2, on page 3.

5 and 8 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks", and the like.

V-INFORMATIONAL MATERIALS¹⁰

11. Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials? Yes No

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

12. Identify each such foreign principal.

Federal State Unitary Enterprise Rossiya Segodnya International Information Agency

13. Has a budget been established or specified sum of money allocated to finance your activities in preparing or disseminating informational materials? Yes No

If yes, identify each such foreign principal, specify amount and for what period of time.

Federal State Unitary Enterprise Rossiya Segodnya International Information Agency - \$30,000/month

14. Will any public relations firms or publicity agents participate in the preparation or dissemination of such informational materials?

Yes No

If yes, furnish the names and addresses of such persons or firms.

15. Activities in preparing or disseminating informational materials will include the use of the following:

- Radio or TV broadcasts
- Magazine or newspaper
- Motion picture films
- Letters or telegrams
- Advertising campaigns
- Press releases
- Pamphlets or other publications
- Lectures or speeches
- Other (specify) _____

Electronic Communications

- Email
- Website URL(s): _____
- Social media website URL(s): _____
- Other (specify) _____

16. Informational materials will be disseminated among the following groups:

- Public officials
- Civic groups or associations
- Legislators
- Libraries
- Government agencies
- Educational groups
- Newspapers
- Nationality groups
- Editors
- Other (specify) Radio listeners

17. Indicate language to be used in the informational materials:

- English
- Other (specify) _____

¹⁰ The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI-EXHIBITS AND ATTACHMENTS

18. (a) The following described exhibits shall be filed in triplicate with an initial registration statement:

Exhibit A- This exhibit, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal named in Item 7.

Exhibit B- This exhibit, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

(b) An Exhibit C shall be filed when applicable. This exhibit, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530. (See Rule 201(e) and (d)).

(c) An Exhibit D shall be filed when applicable. This exhibit, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal. (See Rule 201 (e)).


VII-EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature¹¹)

11/5/2017


JOHN F. GARZIGLIA

¹¹ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.