

THE DIFFUSION OF AUTHORITARIAN

REGIMES AND THE

RUSSIAN HANDBOOK



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Legislation targeting non-governmental organizations in Eastern Europe and Central Asia aimed to silence criticism and strengthen power.

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MAIN FINDINGS

- There are conceptual and fundamental similarities in “Foreign Agents” legislation in Georgia, Slovakia, Kyrgyzstan, and Republika Srpska – a federal entity of Bosnia and Herzegovina.
- There are conceptual and fundamental similarities between the adopted legislation in these four locations and the laws adopted in Russia.
- The initiation of these laws serves Russia’s short-term geopolitical interests and long-term strategy, showing the growing strategic alignment of the researched countries/federal entity with Russia.
- In all four cases, the respective governments and Russia systematically and purposely strengthen mutual narratives and propagandist messages.
- “Authoritarian Diffusion” - authoritarian regimes learn from each other.
- “Hybrid Warfare” - the conduct of military-level propaganda operations.

INTRODUCTION

The current global confrontation of democracy and authoritarianism is not only conducted by military actions but also with covert hybrid methods. The initiation of Russian-style “Foreign Agents” legislation in different parts of the world is a significant example of this.

The aim of such legislation is to weaken the rule of democracy and promote the establishment or consolidation of Russian-style autocratic regimes. This research examines four cases of “Foreign Agents” laws initiation in Georgia, Slovakia, Kyrgyzstan, and Republika Srpska of Bosnia and Herzegovina.

This article compares the legislation, related disinformation campaigns, and presents the geopolitical context of these events. The analysis establishes indicators that clearly point to the ability of authoritarian regimes to share each other’s methods to strengthen their rule, as well as ties the adoption/initiation of these laws to Russia’s foreign policy strategy.

CHAPTER 1: RUSSIA'S IMPERIALISTIC AMBITIONS AND THE WAVE OF AUTHORITARIANISM

Russia's full-scale military aggression against Ukraine in 2022 served as a wake-up call for the entire world, particularly for Europe and the United States. Western leaders finally recognized what Eastern European states have known for centuries - Russia aims to dismantle the modern world order, restore its empire, and fully dominate its neighboring countries.

Throughout its history, Russia has consistently pursued imperialistic goals. Its geopolitical strategy to influence the regional and global politics remains unchanged on all stages of its existence – from the Czarist empire, throughout the Soviet Union to modern Russia, evolving only to reflect its varying political, economic, and military resources and geopolitical factors. The Western world largely overlooked this reality when engaging with Russia, leading to military aggression against Georgia in 2008 and subsequent invasions in Ukraine in 2014 and 2022. However, military aggression is not Russia's only method of spreading influence.

That's why, alongside the current military conflict in Ukraine, it is important not to ignore Russia's other, less visible but nonetheless effective methods of action. At least four countries, including Georgia, Slovakia, Kyrgyzstan, and the Republika Srpska (a federal entity of Bosnia and Herzegovina), have enacted "Foreign Agents" laws in the past two years.

All four of these countries are of particular interest to Russia. Georgia and Kyrgyzstan are situated near Russia and are considered by Russia to be within its

sphere of influence. Both of these countries have expressed desires for democratization, although to varying degrees. Georgia has maintained a pro-Western stance for many years, with the ultimate goal of joining the EU and NATO.

Bosnia and Herzegovina is located in the western Balkans, a region of interest for Russia. The country also has aspirations to join the European Union. However, Republika Srpska, presents a problematic federal entity that could be used to hinder Bosnia and Herzegovina's EU accession process. It is evident that preventing the democratization of the four mentioned countries, and hindering European integration in the case of the last two, serves as an effective mechanism for Russia to implement its imperialistic goals. This mechanism allows Russia to strengthen its influence in these regions (the western Balkans, the eastern Black Sea coast, and Central Asia).

Slovakia stands out as being different from the other three countries. It is already a member of the European Union and NATO. However, its current prime minister, Robert Fico, is known for his pro-Russian stance. His actions are seen as undermining Slovakia's democracy, creating an additional crisis for the EU, and aligning with Russia's foreign policy aims. By achieving these short-term goals, Russia is advancing its geopolitical strategy, seeking to undermine the current world order based on international law, human rights, and the global promotion of democracy, in favor of authoritarianism.

In all four countries, the respective governments are led by individuals known for their pro-Russian sentiments or direct links to Russia. For example, the “honorary chairman” of Georgia’s ruling party, Bidzina Ivanishvili, is an oligarch who amassed his wealth in Russia. While refraining from openly stating support for Russia due to the general pro-Western attitudes of the Georgian public, the Georgian authorities’ positions on NATO, [restoring flights](#) to Russia, and other issues indicate Russian-sympathetic or even directly Russia-dictated narratives.

The current president of Kyrgyzstan also has significant ties to Russia. His first visit as head of state was to Moscow, and his official position on the war in Ukraine is neutral, leaning more towards pro-Russian. The leader of Republika Srpska, Milorad Dodik, is likewise known for his openly pro-Russian [statements](#): in 2023, amid the war in Ukraine, he stated, “Republika Srpska remains pro-Russian, anti-Western, and anti-American.” As for the President of Slovakia, Robert Fico, he leads a populist party that, as mentioned above, is known for its anti-Ukrainian and pro-Russian statements.

Conclusively, the political climate in these countries is conducive to Russia’s imperialistic goals. Each country’s leadership maintains positive relations with the Russian Federation, aligning with Russia’s foreign policy objectives.

CHAPTER 2: IMPLICATIONS OF INITIATED AND ADOPTED LEGISLATION

The analysis reveals significant similarities among the “Foreign Agents” laws and legal amendments in four countries. The respective authorities of these countries have gained new repressive tools to restrict the activities of democratic non-governmental and media organizations that they deem undesirable. These laws provide various ways to achieve this hidden but easily detectable objective.

Firstly, the laws make it possible to stigmatize civil society by labeling it as a “Foreign agent” or “Foreign influencer.” This is accompanied by a disproportionate sanctions mechanism that allows the government to halt the activities of specific organizations. In the case of Georgia, this mechanism provides the possibility to freeze organization’s financial accounts. In Kyrgyzstan, Republika Srpska, and Slovakia, the legislation allows authorities to suspend or prohibit the activities of non-governmental organizations if they do not comply with the new regulations. Another notable similarity is that this legislation encompasses the entire civil sector and media organizations, or a significant portion of them.

The activities regulated by the legislation in some countries are described in such vague terms that they could apply to any major non-governmental actor. This situation is particularly evident in the current “Foreign Agents” legislation in Russia.

The introduction of these laws led to protests by local organizations and significant international responses from prominent organizations, as well as from the United States and the EU. These responses highlighted concerns about the backsliding of democracy and the restrictions on human rights in the respective countries. The negative impact of these processes on the European integration of Georgia and Bosnia and Herzegovina was also emphasized.

The reaction of the local and international community clearly states that the adoption of such laws is strengthening Russian influence in the regions mentioned above; it creates a base for Russian-style rule, which guarantees the current leaders keep their power while mechanisms for public transparency are being dismantled. All these resulted in Russia achieving its imperialistic goals – spreading its influence over Georgia and Kyrgyzstan, hindering Georgian and West Balkan European integration, as well as creating an additional tension point of internal crisis in the EU in the case of Slovakia.

At this stage, the Kremlin-inspired “Foreign Agents” legislation was only adopted in Georgia and Kyrgyzstan. This process, due to various reasons was suspended, at least temporarily, in Republika Srpska and Slovakia.

GEORGIA

In February 2023, People's Power, a group of politicians informally separated from the "Georgian Dream", initiated the draft law "On Transparency of Foreign Influence", which envisioned the creation of a register of "agents" of foreign influence. Later, the same People's Power introduced another bill, this time on the "Foreign Agent Registration Act", which, according to them, was an "exact translation" of the [American law](#).

In the aftermath of mass [protests](#) and international criticism, the ruling party had to recall draft laws that media and civil society named the "Russian law" due to its content and goals. Despite public statements and promises, Georgian Dream reintroduced the law "On Transparency of Foreign Influence" on April 3, 2024.

The draft law [envisages](#) the creation of the registry of organizations "pursuing the interests of a foreign power, which will contain those legal entities whose overall funding from a "foreign power" exceeds 20% within a calendar year.

A "foreign power" is defined as any individual who is not a Georgian citizen or an entity not founded based on Georgian legislation. Avoiding registration and failing to promptly provide a financial declaration are punishable by a GEL 25,000 fine. Unaddressed issues will result in a GEL 10,000 fine for an organization and a GEL 20,000 fine in case of a repeat violation.

Despite the fines, the organization is not exempted from the legal responsibilities and still has to register. "Foreign Agents" law implies a mechanism for surveillance as well. An amendment was made after the second hearing of the law. This amendment included a GEL 5,000 fine for persons who failed to fulfill the Ministry of Justice requests, including providing personal and confidential information. On May 28, Georgian Dream [overrun](#) the veto of Georgian president Salome Zurbichvili and adopted the law. According to the assessment of local and international organizations, the above-mentioned law is unjustified. An appeal was made for the ruling party to revoke it.

REPUBLIKA SRPSKA

On March 23, 2023, the government of the Republika Srpska, a federal entity within Bosnia and Herzegovina, approved a draft law on the Special Registry and Transparency of the Work of Nonprofit Organizations. The [draft law](#) was aimed at civil society and foreign international organizations and included funding regulations.

According to the draft law, non-governmental organizations are prohibited from political activity; they have to apply for a special registry and mention a corresponding note in all published materials. The organizations were also required to present an additional report, a regulation already in place in accordance with the 2001 law on associations and funds.

Non-governmental organizations also become subjects of additional oversight and inspection, with a whole range of sanctions introduced for violating the draft law that could lead to their prohibition.

The draft law's [explanatory note](#) lists the reasons for its adoption, including the lack of regulations on non-profit organizations' openness of work and supervision of their political activities, accounts, and registration. The note also mentions the "transparency of non-governmental organizations' work."

KYRGYZSTAN

On May 19, 2023, 33 members of the Kyrgyzstan Parliament [presented](#) a draft law "on the Amendments to Certain Legislative Acts of the Kyrgyz Republic" for a public hearing. The draft law's articles were identical to those presented in November 2022, excluding the amendments of the regulations proposed for the law "On the State Registration of Legal Entities and Subsidiaries," which was not in effect. The draft law passed the public hearing and was transferred to a corresponding parliament committee for discussion.

Like the Russian "Foreign Agents" legislation, the Kyrgyzstan law [obliges](#) non-profit organizations that receive foreign funding and engage in what it defines political activities to register as "foreign representatives." According to the law, nonprofits should add a corresponding label to their publications, indicating that the material was produced or promoted by a representative of a foreign power. They also have to conform with costly financial reporting obligations and governmental oversight.

The law [provides](#) the Ministry of Justice with the right to inspect the organizations, interfere in their affairs, and suspend their activities at the ministry's discretion for up to six months with a possibility of following liquidation through the court. The law implies the prohibition of organizations from continuing to

The draft law presented was heavily [criticized](#) and later revoked by the authorities on May 28, 2024. "Republika Srpska is committed to the European path. We agreed to withdraw it and additionally harmonize it with European legal practice," the leader of Bosnian Serbs [posted](#) on X.

It's noteworthy that similar legislation was attempted to be adopted in 2015 and 2018, motivated by the fight against money laundering and terrorism. However, it was withdrawn following political pressure and criticism.

operate with the registration. On March 14, 2024, the parliament [adopted](#) the "Foreign Agents," law and the President of Kyrgyzstan [signed](#) the bill into law on April 2.

Adopting the law by itself presented a serious challenge, however, the mechanisms for its implementation remain unclear. Even the Ministry of Justice, in charge of the law's implementation oversight, admitted the lack of clarity regarding the effectiveness of the implementation. The original version of the law even included criminal responsibility. However, this was removed in the final draft of the bill. Despite this change seemingly decreasing the severity of this law, it still contains a punishing mechanism that could significantly limit the activity of non-governmental organizations and media when used in practice.

There was an earlier attempt to adopt a similar law in Kyrgyzstan. Two members of the Kyrgyzstan parliament proposed to adopt the law "On the Amendments and Amendments Proposal in Certain Legislation of the Kyrgyz Republic" back in September 2013. This draft law was publicly known as the "On Foreign Agents" bill. The bill was [rejected](#) in 2016 following public discussions of the civil society and advocacy campaigns.

SLOVAKIA

The ruling coalition of Slovakia initiated the bill in May 2024. According to the existing project, non-governmental organizations with annual foreign funding of more than EUR 5,000 must annually publish the identity of all donors, contributors, and lenders whose donations, contributions, or loans exceed EUR 5,000 a year.

Those non-governmental organizations with the annual funding of over EUR 50,000 have to present an annual report to the Ministry of Interior, which has a power to fine and shut down the organizations not complying with the reporting and corresponding directives. The discussion of the amendments is scheduled for September 2024.

Prime Minister Robert Fico took the [initiative](#) to introduce a similar law back in 2018. This initiative caused a large-scale public protest, which was followed by the murder of journalist Jan Kuciak and his fiancée, Martina Kusnirova. Robert Fico claimed that non-governmental organizations funded by George Soros organized the wave of the protest rallies. Eventually, Fico had to resign from the position of prime minister.

CHAPTER 3: DISINFORMATION AS A TOOL FOR MANIPULATING PUBLIC OPINION

Georgia, Slovakia, Republika Srpska, and Kyrgyzstan have a similar timing of initiation, discussion, or adoption of Russian-style “Foreign Agents” legislation. We decided to present the disinformation narratives spread by the respective authorities of these countries regarding the legislation. The study showed a significant similarity of the narratives, as presented in this part of the research.

Several weeks prior to the March 2012 presidential elections and some months prior to the adoption of the “Agents Law,” the president of Russia, Vladimir Putin, accused specific foreign-funded non-governmental organizations of promoting the interests of “Foreign Masters” with the “aim to destabilize other countries.”

At the same time, Putin constantly [accused](#) the non-governmental organizations of aiding the US government in meddling with Russia’s internal affairs.

The Media Development Foundation’s “Anti-Western Propaganda 2022” [study](#) shows that the concept of “sovereign democracy” appeared in Russia in 2005. According to Vladimir Putin’s former counselor Vladislav Surkov, the concept of the “sovereign democracy” contains two main messages: 1) Russia is a democratic state; 2) Calling this fact into question is considered an unfriendly action and interference with Russia’s internal affairs.

We have pinpointed and studied three main messages the authorities of Georgia and the other states have promoted for the last two and a half years.

"CIVIL SOCIETY AS THE VILLAINS"

"Civil Society as the Villains" is a disinformation narrative that is being promoted to justify the law. The governments in all four states are trying to portray civil society and independent media as dishonest and non-transparent actors, whose activities cause harm to society.

MAIN SUB-NARRATIVES:

- Civil society serves foreign interest
- Civil society is non-transparent
- Civil society is against the church
- Civil society promotes LGBT+ propaganda
- Civil society seeks to destabilize society
- Civil society seeks to drag Georgia into a war with Russia
- Civil society has political goals, cooperates with opposition undermining the democratic state and government

GEORGIA

Hostile rhetoric towards the civil sector has significantly increased in the discourse of the ruling party since 2022. The foreign policy orientation of the ruling party and their desire for Georgia's EU membership became a subject of harsh criticism following Russia's full-scale invasion of Ukraine, Georgia's [failure](#) to obtain EU candidate status in 2022 (in contrast to Ukraine and Moldova), and openly anti-Western and [pro-Russian](#) statements of Georgian officials. In response to the peaceful rallies in support of Georgia's European aspirations, one of Georgian Dream leaders, Mamuka Mdinardze [stated](#) when evaluating the [protests](#) actions in Georgai that "there are extremely wealthy non-governmental organizations in Georgia, who have much more funding than the most of the parties and we saw what purpose does it all serve. Based on facts, we can conclude that this money, tens of millions, which funds the non-governmental organizations, is being used against the state..."

"Pro-Russian powers started to promote their agenda in 2012 more freely; the public started to get used to those narratives as the most marginal groups were given the liberty to spread it. All this later led to the direct statements of the politicians," Lika Zakashvili, editor of Publika online media outlet, states.

"Similar messages were heard from certain persons within the Georgian Dream, which was eclectic in composition. The messages were as follows: Soros and non-governmental organizations plot colored revolutions, fight the church and traditions, impose Western values, and promote foreign interests instead of the interests of the Georgian people. Since 2022, both the Georgian Dream and affiliated People's Power party become notorious for that," Tamar Kintsurashvili, executive director of the Media Development Foundation, stated.

By the end of 2022, People's Power, which had informally seceded from the Georgian Dream, demanded the regulation of the non-governmental sector by presenting a draft law in February 2023. Georgian Dream, however, revoked this bill due to public resistance.

"When you are in the right and do not plan to damage anything, accountability and transparency are the best ways to prevent errors and flaws. Being transparent means being European to me, while being non-transparent means being non-European. It is extremely non-European to avoid the minimal standards and refuse to publish even a mere annual financial declaration. It is clear that some damage is being done, and there is something to conceal in this case," Prime Minister Irakli Kobakhidze [wrote](#) on April 3, 2024. He used this negative rhetoric to inform the public about the re-initiation of the "Agents Law."

Georgian Dream's most crucial disinformative narrative – fear of a war with Russia that has been used in politicians' statements ever since Russia's full-scale invasion of Ukraine, was also used regarding the law.

"NGOs openly joined the Second Front campaign since 2022. They demanded the sanctions [against Russia] since the first days of the war [in Ukraine]," - Prime Minister Irakli Kobakhidze [claimed](#).

The following is a description of non-governmental organizations, media, and donor activities [made](#) by the Tbilisi Mayor and the General Secretary of the Georgian Dream party on May 16, 2024:

“First, there was a revolution attempt by the opposition, then by the NGOs, followed by journalists. Now, in 2024, we have a revolution attempt by donor organizations.”

Ultimately, the Georgian Dream [tied](#) the law to a larger conspiracy theories, claiming “the Global War Party has a decisive, critical influence on the official structures of the US and EU,” funding and directing the non-governmental sector.

SLOVAKIA

The demonization of non-governmental organizations and independent media is nothing new in Slovakia. The chairman of the Social-Democratic party (Smer-SD), Robert Fico, has [depicted](#) the non-governmental sector as a tool of foreign powers for years, alongside his [attacks](#) on the Western allies.

“There is immense pressure on journalists, independent media, and non-governmental organizations, which are often labeled as overly liberal, overly European, and seen as entities controlled and directed by the U.S. and George Soros,” – says Veronika Frankovska, representative of Demagog.sk, a fact-checking organization.

According to Jan Cingel, the head of the Strategic Analysis Center, 2018 was a pivotal year for Slovakia when Fico had to resign from his position due to pressure from the civil sector following the infamous murder of Slovak investigative journalist Jan Kuciak and his fiancée.

Fico accused the then-president of “collaborating with George Soros in order to destabilize the government.” Returning to power in 2023, Fico [stated](#), “In the last five to ten years, NGOs have committed evil deeds in Slovakia and disrupted the balance in nature.”

Georgian Dream used the protection of traditional values to justify the stigmatization of the non-governmental sector, [claiming](#) the law was the best way to regulate the non-governmental sector, presenting it as a promoter of “LGBT propaganda.”

“There were members of the organizations insulting the church [at the rally]... Of course, it is crucial for us to disrupt the anti-church propaganda and all actions directed against the state’s interests,” Irakli Kobakhidze [said](#) in 2023.

Ultra-right and pro-Russian Slovak National Party, which is in a [coalition](#) with the Social-Democratic Party, initiated a bill in the spring of 2024 to amend the legislation on the non-governmental sector, also called the “Agents Law.”

Non-governmental organizations are often [called](#) actors with “political” goals. “In reality, political non-governmental organizations do not exist... Them [authorities], however, label those organizations [watchdogs] who criticize their policy as political,” - Lukas Diko, editor-in-chief at the Investigative Center of Jan Kuciak states.

The initiated amendments to the legislation were eventually postponed till autumn 2024, explained by the prime minister’s assassination attempt.

KYRGYZSTAN

The discourse on implementing the “Foreign Agents Law” and the advocacy attempts should be [viewed](#) in the context of non-governmental organizations and civil involvement in the country, as they affect Kyrgyzstan’s democratic integrity and transparency.

On October 15, 2023 parliament [speech](#), one of the bill’s initiators, Nadira Narmatova, a member of the Ata-Jurt party, [notorious](#) for her anti-Western sentiment, accused non-governmental organizations of being among those who caused three revolutions and riots.

Before the law’s adoption, the bill’s authors used Kremlin-style rhetoric announcing that the law, in case of adoption, would only be directed toward foreign-funded non-governmental organizations engaged in “political activity.”

“There will be no peace established in the republic until we designate them as foreign agents. Several NGOs funded from abroad are continually pressuring the government, aiming to take power themselves,” MP Nadira Narmatova [stated](#) in 2022.

“A significant part of them [non-governmental organizations], contrary to their founding documentation, interferes with the state’s political processes. By providing funding, organizing and conducting political rallies, they try to form public opinion and oppose certain state bodies’ decisions, which contradicts the commitment and purpose of the state sustainable development policy,” - [reads](#) the editorial note of the Justice Ministry of the Kyrgyz Republic.

“Non-governmental organizations are often called “pests” and are presented as harmful to people’s traditional principles and moral values. In particular, this concerns the stereotype that most of the non-governmental organizations consist of people representing the LGBT community,” - senior project coordinator of the Human Rights Movement Bir Duino Kyrgyzstan, Murat Karypov stated.

“...foreign institutions with Western ideology support the promotion of LGBT people...” Nadira Narmatova [stated](#) in 2022.

REPUBLIKA SRPSKA

The events surrounding the adoption of the “Foreign Agents Law” in Bosnia and Herzegovina revealed serious issues with the processes in legislation, geopolitics, and the interior. Despite the adoption of the law was suspended, government officials make periodical statements on its possible reanimation.

The influence on “Republika Srpska’s integrity and constitution” by the so-called „politically active“ non-governmental organizations as well as the non-governmental organizations’ “misuse prevention” were [brought up](#) as one of the arguments for the initiation of the bill.

“Their [the authorities’] narratives often claims that NGOs are spreading various kinds of influence, that they are prone to spreading lies and attacking the government of Republika Srpska, and that their finances lack transparency. However, these are false and unfounded statements, as all these organizations are obligated to submit financial reports to both donors and state institutions,” journalist Enes Hodzic, a member of the Balkan Investigative Reporting Network stated.

““There are organizations that use these funds through illegal financial flows for social destruction, destabilization, and eventual financing of terrorist organizations;”” - Milos Bukejlovic, Republika Srpska’s Minister of Justice [claimed](#).

The experts point out that, in comparison to other countries, the government of Republika Srpska required less efforts to pass the legislation.

“THIS IS A WESTERN LAW”

The same disinformation narrative is present in all four cases. This narrative aims to increase the relevance and credibility of the law in the eyes of the public. It emphasizes the similarity of the legislation to the Foreign Agents Registration Act (FARA) found in all four countries' narratives. It's important to note that FARA has [focused](#) on Nazis, Bolsheviks, terrorists, fraudsters, bribe-takers, and others. However, in the four reviewed cases, the proposed legislation is targeting civil sector organizations that are involved in important social and civil activities.

MAIN SUB-NARRATIVES:

- This law mirrors the US Foreign Agents Registration Act (FARA)
- This law is similar to EU directives
- This law is similar to the law initiated in Canada
- This law is similar to the legislation initiated in France

GEORGIA

Local and international non-governmental organizations, experts, and officials heavily [criticized](#) the Foreign Agents law. They underlined that the law was incompatible with Western standards, would negatively affect relations between Georgia and the West, civil society and media, and the general Georgian population, was [unconstitutional](#), and resembled the legislation adopted in [Russia](#) in its spirit and goals. Despite all the criticism, Georgian Dream parliament members claimed the legislation was similar to Western ones and even superior to them.

Back in 2023, the government [claimed](#) the law was similar to the US Foreign Agents Registration Act (FARA).

“FARA (Foreign Agents Registration Act) was adopted in 1938 against the fascists. It was adopted against the fascists, but the FARA law is still very successfully used today. It is one of the most relevant laws in the US, and last year, People’s Power directly translated it,” claimed one of the leaders of Georgian Dream, - Mamuka Mdinaradze, one of the Georgian Dream leaders, [stated](#) in April 2024.

The ruling party also called the law “European. “Stricter regulations have already been implemented in the European Union, this law has passed through the European Commission, and in the coming days, European parliamentarians will put their finger on it and adopt it... The definition of “foreign power” in the European bill is exactly the same as in our bill... “ Irakli Zarkua, a member of the Georgian Dream party, [stated](#) on the air of the pro-governmental Imedi TV.

Apart from European and US legislation, the Foreign Agents law was compared to the legislation [initiated](#) in Canada on Imedi TV air. The news anchor of the

channel announced the initiation of the so-called Foreign Agents registry in Canada in the following manner:

“According to the CBC publication, the violators of the regulations on the Foreign Agents Law Registry may be fined with millions of dollars in penalties or go to prison.” The journalist presented a Facebook post of Mamuka Mdinaradze, one of the Georgian Dream leaders, stating, “Canada does not even call them foreign influencers, but explicitly foreign agents!”.

It’s worth noting that the Georgian Dream attempted to ensure the population that the law was not styled after Russian legislation. “No one can provide an example where we have taken a step that would advance Russian interests,” Kakha Kaladze, General Secretary of the party and Tbilisi Mayor, [wrote](#) on May 16, 2024. Notably, following the evaluation of the context of the law’s initiation and legislation analysis, many local and international actors [confirmed](#) the similarities between the initiated Georgian and [adopted](#) Russian laws.

SLOVAKIA

Despite much criticism pointing out that the law contradicts Slovakia's constitution and European legislation, is considered to be discriminating, and is compared to Hungaria's adopted legislation later suspended by the European Court as well as the long-adopted Russian law, the ruling party claimed the law to be Western in its essence and goals.

"This is the same law as in the US," - that was one of the main disinforming narratives during the time of the drafting of the bill, Lukas Diko, editor-in-chief at the Investigative Center of Jan Kuciak, said. "This legislative amendment

does not only contradict European legislation but the constitution of Slovakia as well," - he added.

"If you ask me, I only plan to copy the current United States legislation to the letter. This is very simple: the law states that non-governmental organizations funded from abroad and conducting activities on Slovakian soil should have the status of a foreign agent. This is not our law; this is the law of the United States of America," - Fico [stated](#) in the autumn of 2023.

KYRGYZSTAN

President Japarov drew parallels between the Kyrgyz law and the US Foreign Agents Registration Act (FARA) and pointed to the similarities, including those aimed at overcoming current challenges.

"You know, that FARA provides for the status of a foreign agent not only for the media but also for other legal and physical persons. Delaying or refusing registration will result in not only administrative but also criminal liability. So, the question arises, why can't we do the same?," - [president](#) Japarov stated.

REPUBLIKA SRPSKA

Representatives of the government advocated for the proposed law and underlined its compliance with the Western legislative [framework](#). According to the officials, the US [FARA](#) and Canadian law served as the [sources](#) for their bill. Therefore, the government did not share a consideration that the law mentioned above was inspired by the law adopted in Russia.

“The United States of America, in its law, considers foreign non-governmental organizations or foreign-funded organizations to be foreign agents on the US territory. We will take all this terminology and propose this law. We will just replace the phrase “United States of America” with “Republika Srpska.” Where it says “the US Ministry of Justice,” it will say “Republika Srpska’s.” I would like to hear what the Americans have to say about this,” Milorad Dodik [stated](#).

After the bill was revoked, the president of Republika Srpska claimed that it was done to better [harmonize](#) it with European legislation.

“SOVEREIGNTY AGAINST WESTERN “INTERFERENCE””

Using sovereignty to counter Western “interference” is one of the widely used narratives we encounter in all four cases.

MAIN SUB-NARRATIVES:

- Non-interference in domestic affairs
- “Global War Party” and “Second Front”
- We fight on your behalf
- We will protect you from harmful influences

GEORGIA

The ruling party dismisses the Western partner's criticism of the law, often citing the need to protect the country's sovereignty as the reason. The law is [regarded](#) as one of the mechanisms to strengthen sovereignty.

"The people of Georgia elect the highest representative body of the country, and it is accountable only to the people of Georgia. It acted in agreement with the will of the Georgian people and created a legal basis to strengthen the state sovereignty of Georgia," Prime Minister Irakli Kobakhidze [announced](#) in the parliament on the day the law was adopted.

"Any criticism of the internal democratic process is viewed by authorities as interference in domestic affairs, creating the narrative that subservience to Moscow has simply been replaced by an American or EU dictatorship. Autocracies perceive democracy and democratic institutions as a threat", says Tamar Kintsurashvili, executive director of the Media Development Fund.

"This bill will make a significant contribution to strengthening the state sovereignty. In addition, this bill will make a significant contribution to preventing violent actions by the political minority, as we saw yesterday," Prime Minister Irakli Kobakhidze [stated](#).

"I promise you that we will overcome all obstacles, we will strengthen our sovereignty, maintain peace, strengthen Georgian economy, and in 2030 we will become a member country of the European Union," - Bidzina Ivanishvili, the Georgian Dream honorary chairman, announced at the Georgian Dream rally on April 29, 2024. In the same speech, Ivanishvili mentioned the Global War Party, claiming it attempts to open a "second front" in Georgia.

The government and affiliated groups use the protection of sovereignty and non-interference in domestic affairs regarding the demand for sanctions against Russia following its invasion of Ukraine. "Let me remind you that you were demanding in the same harsh manner that we impose sanctions on Russia immediately after the start of the Russo-Ukrainian war and cut off all economic and trade contacts with one stroke, but we did not do it," - The People's Power party [announced](#) in response to the US ambassador Robin Dunnigan's June 20, 2024, interview with IPN.

SLOVAKIA

As Slovakia's new government assumed power, they announced their view on foreign policy. It [included](#) the so-called "Slovak sovereign foreign policy," which implied that the country would cooperate with "all four sides" of the world.

"You will hear the voice of sovereign Slovakia from Slovak ministries and see sovereign Slovak foreign policy," - Prime Minister Robert Fico [stated](#) in 2023. He underlined his determination not to support the sanctions against Russia until an analysis of the sanctions is available.

According to Boris Strecansky, a board member of the Slovakian Center for Philanthropy, the statements of the Slovak government representatives on

the orientation of the foreign policy to "all four sides" in reality mean that "it is acceptable for the Slovakian foreign policy to activate relations with Russia, even though Russia considers you an enemy and our allies — the EU and NATO — restrict relations with Russia."

"The current government believes that NGOs in Slovakia are oriented towards the West, including liberal and progressive ideologies, which are not good for Slovakia. According to the government, NGOs carrying foreign interests and culture are foreign to Slovak culture, Strecansky says.

KYRGYZSTAN

The president of Kyrgyzstan, Sadyr Japarov, [responded](#) harshly to the US Secretary of State, Antony Blinken's expressed concern over legislative amendments similar to the Russian Foreign Agents Law.

President Japarov claimed that the legislation designating non-governmental organizations as "foreign agents" responds to a legitimate concern about protecting state interests.

According to the president, the State Secretary's evaluations were based on "false and unreliable" information provided by the local non-governmental organizations.

"I have to note with regret that the content of your letter has signs of interference in the internal affairs of our state," - Sadyr Japarov wrote to the US State Secretary.

REPUBLIKA SRPSKA

Milorad Dodik's government constantly underlines the absence of autonomy in Republika Srpska. According to him, this is caused by Western partners' [interference](#) in internal affairs.

"I agree that Bosnia and Herzegovina is not sovereign due to the Bosnian policy of subservience to the West," - president Milorad Dodik [stated](#).

"Republika Srpska remains pro-Russian, anti-Western, and anti-American," - Dodik [stated](#) during his meeting with Putin in May 2023.

CONCLUSION

This article reviews four specific cases of initiating Russian-style so-called “Foreign Agents” legislation. This review presents the processes analysis and geopolitical perspective as well as the specific disinformation narratives accompanying the adoption or initiation of this legislation. The comparative analysis highlighted apparent similarities in various interconnected aspects:

1. The initiated legislation in all four countries is similar to each other – it implies stigmatization of the civil sector, tools the executive authorities with disproportional mechanisms, and covers all or most of the non-governmental sector;
2. All four draft laws are inspired by current Russian law – there are apparent similarities in labeling and executive mechanisms;
3. Prior to the initiation and alongside the initiation or adoption, the governments used similar disinformation narratives to manipulate public opinion;
4. By activating those laws, Russia achieves its foreign policy goals – to establish Russian-like autocratic rule in Georgia and Kyrgyzstan in order to

repress free civil society. It dramatically facilitates Russia’s information or other hybrid campaigns in case of success. Georgia, this process is complemented by the complete sabotage of its European future. In the case of Republika Srpska, the adoption of this law would significantly hinder Bosnia and Herzegovina’s EU integration, which would affect the integration of the West Balkan region as a whole. This outcome is essential for Russian-Serbian relations and generally accords with Russia’s interests in this region. In Slovakia, on the other hand, adopting this law would lead to the appearance of another problematic state, alongside Hungary, within the EU and creating another tension point of the crisis.

Those four similarities in processes in the four respective countries attest to the ability of autocratic regimes to learn from each other’s experiences and use mechanisms tested in other countries to repress democratic spaces in their own; on the other hand, they point to the full alignment of these processes with Russia’s short-term foreign policy goals as well as its long-term vision and strategy.