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**Georgia at the Crossroads: competing narratives on the “Transparency of
Foreign Influence” law**

MASTER THESIS

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Abstract: This Master’s thesis examines the framing of Georgia’s “Transparency of Foreign Influence” law, first introduced in 2023 and later reintroduced and adopted in 2024 following public protests and international criticism. The law requires NGOs receiving over 20% of their funding from foreign sources to register as “organizations pursuing the interests of a foreign power.” The government framed it as a measure to protect national security and sovereignty, while opposition parties, international actors, and the president argued that it threatened democracy and Georgia’s EU integration. Using framing analysis, the study explores how the government, opposition, president, and international partners shaped narratives around the law, highlighting the government’s failed attempt to securitize it as an existential threat.

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Introduction

On 14th May 2024, the Georgian Government adopted its controversial draft legislation “on the transparency of foreign influence” into law. It compels civil society organizations receiving foreign funding more than 20 percent of their income to register as “organizations pursuing the interest of a foreign power”. This was the second attempt to introduce such legislation, in the face of significant public protests. Compared to the first draft law proposed by the People’s Power in 2023, this new version changed “agents of foreign influence” to “organizations pursuing the interest of a foreign power”. The government argues that they protect national security and prevent foreign agents from interfering in Georgia’s domestic affairs. The government has used disproportionate force against protesters, resulting in violence and intimidation. The government authorities have intensified crackdowns on civil society through threatening phone calls and posters containing insults and beating opposition members. Protestors who actively participated in protests were summoned to the Interior Ministry for questioning.¹

The legislation has faced criticism for potentially stifling media freedom and civil society, drawing parallels to similar laws in Russia. The international community, including the US and EU, has responded with concerns and potential sanctions, arguing that the law could undermine Georgia's democratic development and EU accession prospects. The EU criticized the law for not aligning with European values and warned it could hinder Georgia's EU accession. A huge part of the Georgian citizens who are against this law argue that it separates Georgia from EU membership and poses a threat to democracy. Euro-Atlantic course is the unwavering will and choice of the Georgian people, which is confirmed in Article 78 of the Constitution of Georgia. This article obliges the government to take all measures to join the European Union and NATO. Euro-Atlantic provisions were introduced into the Georgian Constitution through a constitutional amendment in 2018. In particular, the Georgian Constitution in Article 78 states: “The constitutional bodies shall take all measures

¹ Mariam Uberi, “Georgia’s new law on “transparency of foreign influence” and its incompatibility with international human rights standards”, The Foreign Policy Center, (22 May 2024); <https://fpc.org.uk/georgias-new-law-on-transparency-of-foreign-influence-and-its-incompatibility-with-international-human-rights-standards/>;

within the scope of their competences to ensure the full integration of Georgia into the European Union and the North Atlantic Treaty Organization.”²

Problem: Differing opinions surrounding the law and its consequences after its adoption underscore the significance of understanding how this legislation is framed by various actors. These frames are critical for evaluating the future of Georgia’s civil sector, its broader democratic development, and its Euro-Atlantic aspirations.

- **Research Question:** How have the Georgian government, opposition, and international community framed narratives surrounding the "Transparency of Foreign Influence" law?
- **The aim** of this analysis is to identify the differing frames surrounding the “Transparency of Foreign Influence” law in Georgia and to analyze the perspectives associated with each frame.
- **Defended Statement:** The Georgian government's framing of the "Transparency of Foreign Influence" as a national security measure represents a failed securitization attempt, as key audiences—domestic and international—have resisted accepting the issue as an existential threat.

² Georgian Parliament of the Republic of Georgia, Constitution of Georgia, (24.08.1995), Chapter Eleven, Article 78, <https://matsne.gov.ge/en/document/view/30346>;

1. Literature Review

Irakli Javakhishvili, in the article “The Failure of Georgia's Pro-European Foreign Policy: The Main Obstacle to Obtaining Candidate Status” analyses how the “peace discourse” serves as a pivotal tool for the ruling party, Georgian Dream, to drift away from European integration. The author also focuses on the creation of People's Power as a response and their intervention in the controversial "Foreign Agent" bill, highlighting the party representatives' argument that the official aim of the law is to ensure transparency. Additionally, he emphasizes EU High Representative Josep Borrell's response, describing the law as incompatible with EU values.³

Teona Zurabashvili In “Georgian Dream’s Grand Finale – Steps towards Consolidated Authoritarianism,” delves into the implications of a controversial Georgian bill compared to the United States' Foreign Agents Registration Act (FARA). She emphasizes that FARA does not include non-democratic mechanisms for limiting non-governmental organizations; instead, it was developed based on national security objectives. The United States passed the Foreign Agents Registration Act in 1938 in response to the growth of Nazi propaganda within the country. After the Cold War era, FARA significantly lost its relevance; however, following Russian interference in the 2016 U.S. presidential election, its active use returned to the agenda.

Zurabashvili further explains that, unlike in the United States, the motive for initiating the Georgian draft law “On Transparency of Foreign Funding” does not align with the goals of national security. Instead, the bill fails to contribute to the country’s national security and is directed against Georgia's strategic partners and national non-governmental organizations that support Georgia's integration into European and North Atlantic structures. Additionally, she argues that the “best Western practices” frequently cited by the ruling party and pro-government media fundamentally differ from the goals of the bill under discussion in the Georgian Parliament.⁴

Viktoriia Lapa and Justin Frosini, in “Challenges to Georgia’s EU Integration: Is the Georgian ‘Russian Law 2.0’ Contrary to the Georgian Constitution?”, delve into the profound

³ Irakli Javakhishvili, “The Failure of Georgia’s Pro-European Foreign Policy: The Main Obstacle to Obtaining Candidate Status”, Georgia – UA: Ukraine Analytica, (September 10, 2023): 27;

⁴Teona zurabashvili, “Georgian Dream’s Grand Finale – Steps towards Consolidated Authoritarianism”, Georgian Institute of politics, policy Memo (23.02.2023): 9;.

implications of legislative initiatives that could potentially derail Georgia's European Union (EU) integration aspirations. The authors underline that the law contradicts Georgia's constitutional and democratic principles and EU integration goals. In particular, they emphasize the significance of Article 78 of the Georgian Constitution and note that the interpretation of Article 78 has already been discussed in a case regarding the possibility of impeaching the President of Georgia over her foreign visits without government approval. In its decision of 16th October 2023, the Constitutional Court ruled that the President violated the Constitution by exceeding her foreign policy powers as established in Article 52 by undertaking foreign visits without government approval. In their dissenting opinion, Constitutional Court judges Irine Imerlishvili, Giorgi Kverenchkhiladze, and Teimuraz Tughush referred to Article 78, stating that "integration into the European Union represents the national interest declared by the Georgian Constitution, parliament, government, and the great majority of the Georgian people." The authors conclude that it remains to be seen whether the Constitutional Court of Georgia will consider the case on the constitutionality of 'Russian Law 2.0'.⁵

Nika Chitadze's article, "The 'Russian Law' Presented by the Georgian Parliament as a Negative Step Towards Authoritarianism," critically examines the implications of Georgia's recent legislative move, the "Law on Transparency of Foreign Influence." The article concludes that the law contradicts Georgia's path toward integration into European and Euro-Atlantic structures and creates a foundation for establishing an authoritarian, Russia-oriented government in Georgia through pressure on civil society. The author highlights that the arguments presented by the Russian government in 2012 and the Georgian government in 2023-2024 are strikingly similar: "Agent" is not a derogatory term, the law is based on the "American model," and "What's wrong with transparency?" Furthermore, in the aftermath of the full-scale war in Ukraine, Western criticism of the "Georgian Dream" is framed as part of a well-planned disinformation campaign based on the "Global War Party" conspiracy theory. According to this theory, a "global war party" aims to drag Georgia into war, using Georgian opposition parties, non-governmental organizations, media, Members of the European Parliament (MEPs), representatives of the Ukrainian government, Mikheil Saakashvili, Salome Zourabichvili, and others as tools. In essence, those labeled as "agents"

⁵ Viktoriia Lapa, Justin Frosini, "Challenges to Georgia's EU Integration: Is the Georgian 'Russian Law 2.0' contrary to the Georgian Constitution?", *VerfBlog*, (13 May 2024), <https://verfassungsblog.de/challenges-to-georgias-eu-integration-is-the-georgian-russian-law-2-0-contrary-to-the-georgian-constitution/>;

by the leaders of the "Georgian Dream" (Commersant, 2024) are part of this alleged conspiracy. However, the leaders of the "Georgian Dream" refuse to clarify what they mean by the "Global War Party."⁶

The article "The Rationale for Reintroducing the Foreign Agent Bill in Georgia before the 2024 Parliamentary Elections" by Tatia Tavkhelidze analyzes the motives behind the Georgian Dream's reintroduction of the bill, mainly targeting nongovernmental organizations and independent outlets, only months before the 2024 parliamentary election in Georgia.

The author emphasizes that besides the strong public opposition, wide protest from the Georgian people, and criticism from the international community, the main reason behind the law is the ruling party's fear of losing elections. Introducing this law aims to weaken these groups, reduce their influence, and prevent them from mobilizing voters. As she emphasizes: "This strategy serves as a means for the ruling party to consolidate absolute authority after the election, even at the cost of impeding EU integration and harming the country's democratic integrity."

She made some parallel to Russia, where the outcome of the law is the silencing of civil society and consolidation of absolute governmental authority; it is the tool for repressing independent media and the NGO sector, leading to the expansion of authoritarian control within the country.⁷

The Georgian Ruling Party's Discursive Confrontations with Domestic and Foreign Actors" by Lia Tsuladze describes that in recent years, Georgia, which was considered a leader of the association trio (Georgia, Moldova, and Ukraine) in terms of implementation reforms, has demonstrated a significant backslide. She mentioned that when Georgia withdrew from President of the European Council Charles Michel's document, which aimed to eliminate political polarisation in Georgia, it was the first time the EU openly stated that GD was deviating from the European course. This policy became noticeable after Russia invaded Ukraine when Georgian leaders refused to join EU sanctions against Russia and called their domestic opponent's war parties" and accused their Western opponents of dragging Georgia into the war," which Irakli Kobakhidze calls, Pragmatic Politics.", that despite the fact that

⁶ Nika Chitadze, "The "Russian law" presented by the Georgian Parliament as a negative step towards authoritarianism", (May 2024);

⁷ Tatia Tavkhelidze, "The Rationale for Reintroducing the Foreign Agent Bill in Georgia before the 2024 Parliamentary Elections", Caucasus Analytical Digest (2024):137, 8-13;

Georgian Dream claims to support EU integration, its actions tell a different story, and takes several examples; when the EU refused to grant Georgia candidate status and set 12 recommendations to implement in 2022, the government increased criticism towards the EU for pursuing double standards. She also mentioned that GD started threatening the citizens with the Russian invasion and representing itself as a guardian of peace the first time it introduced the controversial law in 2023; after breaking its promise and reintroducing it again, GD became more vocal in demonizing civil society and NGOs. As partner's criticism and people's protests increase, their blame and conspiracy also increase, blaming the imaginary, global war party" that tries to make a revolution using the local opposition. The author also pays attention to GD attacks towards domestic actors such as political opponents, NGOs, and the younger generation, especially Gen Z, which became the symbol of the protest both in 2023 and 2024. As this young generation is independent, the governments try to accuse them of being ruled by the opposition parties.⁸

Ekaterine Basilaia's framing analysis of the coverage of the "Transparency of Foreign Influence" law by two Georgian TV broadcasters illustrates starkly contrasting narratives between pro-government and pro-opposition channels. Basilaia's study, which explored media coverage on channels like Imedi and Mtavari Arkhi, reveals polarized narratives:

Imedi: Civil society as a threat; opaque (Western) donor funding; destructive opposition; damaging and ineffective protests; Western interference against state sovereignty; identity and traditional values.

Mtavari Arkhi: Government as an anti-democratic and repressive force; protesters as freedom fighters; Western criticism, sanctions, and Georgia's isolation from the West; economic consequences of the law; pro-European opposition.⁹

Based on the literature review, there is a lack of in-depth analysis regarding the "Foreign Influence Law" and its frame coverage via different actors. Moreover, study expands on the existing literature by incorporating additional frames that further illustrate how different

⁸Lia Tsuladze, "The Georgian Ruling Party's Discursive Confrontations with Domestic and Foreign Actors", *Caucasus Analytical Digest*, (2024):137, 13-17;

⁹ Ekaterine Basilaia, "Georgian TV Broadcasters' Coverage of the Foreign Agents Law", *Caucasus Analytical Digest*, (2024): 137,18-21;

political groups, including opposition parties and international actors, frame the law's transparency and its broader implications for Georgian politics and democracy.

2. Theoretical Approach

I am using securitization theory, specifically to describe “the foreign influence law “as a failed securitization case. The Copenhagen School, established at the Conflict and Peace Research Institute (COPRI) is widely recognized for the contributions of scholars such as Barry Buzan, Ole Wæver, and Jaap de Wilde. Their work, including *Security: A New Framework for Analysis* and other notable publications introduced transformative concepts in security studies, particularly the ideas of securitization and desecuritization.

In the aftermath of the Cold War, the Copenhagen School redefined security studies by expanding the traditional military-centered view. In *Security: A New Framework for Analysis*, the authors conceptualized security as the protection of survival, stating that "security is about survival, occurring when an issue is presented as posing an existential threat to a designated referent object"

Building on this foundation, the Copenhagen School identified five dimensions of security: military, environmental, economic, societal, and political. While maintaining the traditional focus on survival, the approach extended the concept of security beyond military concerns to encompass a broader range of existential threats. This reimagining of security acknowledges that threats can target various referent objects, traditionally including the state but also potentially other entities such as societies or ecosystems.¹⁰

According to Buzan „, security Analysis: Conceptual Apparatus” in the political sector, (referent object) existential threats are traditionally in terms of constituting principle-Sovereignty, but in some cases also ideology – of the state. Sovereignty can be existentially threatened by anything that questions recognition, legitimacy or governing authority.¹¹

Securitized issue means that is framed as a security question through an act of securitization. Another explanation is that A securitizing actor articulates an already politicized issue as an existential threat to a referent object.

¹⁰ Ralf Emmers, “Securitization”, chapter 12 in *Contemporary Security Studies* (5th edition), Alan Collins, (August 2019):173, <https://doi.org/10.1093/hepl/9780198804109.003.0012>;

¹¹ Barry Buzan, Ole Wæver and Jaap de Wilde, Chapter 2 “Security Analysis: Conceptual Apparatus” in “*Security, A New Framework for Analysis*”, (1998):21;

A successful case of securitization means when securitization actor has succeed in convincing a relevant audience (public opinion, politicians, or other elites) that a referent object is existentially threatened and extraordinary measures is necessary.

Importance of speech act is defined also by the Copenhagen School, ‘’. A securitizing actor uses language to articulate a problem in security terms and to persuade a relevant audience of its immediate danger. Although the security speech act is thus ‘negotiated between securitizer and audience’, the role of the audience is crucial, in much as it is the audience that grants the securitizer ‘permission to override the rules.

3. Methodology

Framing has its roots in Erving Goffman’s 1974 work, *Frame Analysis: An Essay on the Organization of Experience*. Goffman introduced frames as “schemata of interpretation” that enable people to “locate, perceive, identify, and label” events and occurrences. The concept was further refined by Robert Entman in his 1993 paper, which established frame analysis as a crucial methodology in media studies.¹² According to Entman „To frame is to select some aspects of a perceived reality and make them more salient in a communicating text, in such a way as to promote a particular problem definition, causal interpretation, moral evaluation, and/or treatment recommendation for the item described. Frames, then, define problems-determine what a causal agent is doing with what costs and benefits, usually measured in terms of common cultural values; diagnose causes-identify the forces creating the problem; make moral judgments-evaluate causal agents and their effects; and suggest remedies-offer and justify treatments for the problems and predict their likely effects. A single sentence may perform more than one of these four framing functions, although many sentences in a text may perform none of them. And a frame in any particular text may not necessarily include all four functions.¹³

¹²Margaret Linström, Willemien Marais, “Qualitative news frame analysis: A methodology”, *Communitas*, (2012): (1), 1-24.

¹³ Robert M. Entman, “Framing: Toward clarification of a fractured paradigm”, *Journal of Communication*, (1993): 43(4), 51–58.

Willemien Marais in his article „ QUALITATIVE NEWS FRAME ANALYSIS: A METHODOLOGY *Communitas*” based on several author’s works presents steps how to conduct framing analysis which I am using in my research.

First step 1: choose a medium/ topic – which widely means a research problem

Step 2: Determine a time- frame- which means to explain why specific period is crucial to analysis.

Step 3: Draw a sample: select a sample for analysis

Step 4: Identify a unit of analysis: it can be theme, or entire article or story

Step 5: Selection of a frame typology, researcher can decide to identify only a dominant frame in each theme while the secondary frame is a supplementary idea that supports the main theme.

Step 6: Operational definitions- According to Wood operational definitions are precise descriptions that specify the phenomena of interest. Also if the concept have been studied by other researchers, it is advisable to consider their definitions.

Step 7: Identifying news frames – based on the research problem there are two frame devices: Rhetorical and technical ones.

Rhetorical devices include word choice, metaphors and exemplars. Other devices that can be examined are the presence or absence of certain keywords, stock phrases, sources of information, and sentences that provide thematically reinforcing clusters of facts or judgement.

Technical devices include layout and visuals. I will use rhetorical devices in my research. Which will be based on word choice: Metaphors, Exemplars and Key words (presence and or absence)¹⁴

An insightful analytical essay by Lin Alexandra Mortensgaard, titled "Contesting Frames and (De)Securitizing Schemas: Bridging the Copenhagen School’s Framework and Framing Theory," explores the relationship between the Copenhagen School's securitization theory and framing theory. Mortensgaard highlights how media frames issues and influences the securitization process. The author argues that by bridging framing theory with the Copenhagen School (CS) of securitization, we can see that both theories examine how issues are linguistically presented to influence public opinion and policy. The media, as a frame-setter, can activate securitizing schemas that shape societal responses.¹⁵

¹⁴ Margaret Linström, Willemien Marais, “Qualitative news frame analysis: A methodology”, *Communitas*, (2012): (1), 1-24.

¹⁵ Lin Alexandra Mortensgaard, “Contesting frames and (de)securitizing schemas: Bridging the Copenhagen School’s framework and framing theory”, *International Studies Review*, (2020): 22(1), 140–166.

3.1 Data

Over 1,000 applications concerning the law were collected in the Excel file, analyzed based on keywords and metaphors, and the most frequent frames are presented. The statements of Georgian politicians, originally in the Georgian language and translated by me (the author), were included in the analysis.

Category	<div data-bbox="794 577 906 638">Details</div> <div data-bbox="794 683 810 750"></div>
Data	-Social Media: Facebook (FB), X.com (formerly Twitter) - Press Releases: Official statements from the President - Media Outlets: TV Imedi, Mtavari Arkhi, TV Pirveli
Type of Data	-Qualitative data (textual data from press releases, social media posts, news articles, and transcripts).
Time Frame	- February–March 2023 - April–October 2023
Methodology	-Framing Analysis
Analytical Focus	-Identification of dominant frames by various actors (President, opposition parties international partners).

Table 1. Representation of summarised analytical framework. Created by keti.khubua

The Story of Georgia's Foreign Influence Law

December 29, 2022, members of the “People’s Power” faction, which included deputies who had left the “Georgian Dream” party but remained in the parliamentary majority, announced plans to introduce two draft laws aimed at regulating “foreign agents.” This marked the start of a highly controversial legislative effort in Georgia's recent political history.

On February 14, 2023, People’s Power announced the introduction of the draft law. According to the proposed legislation, entities considered to represent foreign influence included organizations receiving more than 20% of their funding from abroad which would be required to register as “foreign agents.” Proponents argued that the law was designed to safeguard Georgia from harmful foreign influence and claimed it was based on “best Western practices.” Members of “Georgian Dream” and “People’s Power” frequently repeated this justification. However, the majority of human rights organizations and media outlets strongly opposed the bill. More than 300 NGOs and media organizations believe that this law aims to leave vulnerable groups unprotected.¹⁶ compared the law to Russia's 2012 “foreign agent” law, fearing it would undermine Georgia’s democratic development and its EU aspirations.

The law faced widespread criticism from Georgia’s international partners, the President of Georgia, opposition parties and a significant portion of Georgian people. People protested not only in the capital, Tbilisi but also across multiple cities. GD decision triggered a previously uninvolved segment of society — what is generally known as Generation Z — to become more politically engaged, giving rise to a powerful political force broadly opposed to Georgian Dream’s political agenda.

One of the most significant moments of the March demonstrations was when 47-year-old Nana Malashkhia stood waving a European Union flag while being blasted by a water cannon. This act became a powerful symbol of resistance. (Women with the EU flag) Recognizing her courage, Georgian President Salome Zourabichvili later awarded honor medals to Malashkhia and Nana Makharadze, who participated in Georgia’s April 9, 1989, rally for independence. The honors celebrated their commitment to Georgia’s national

¹⁶ რადიო თავისუფლება, „მდინარაძე ამბობს, რომ ყოფილი ელჩი, „გლობალური ომის პარტიის ინტერესებს წარმოადგენდა“, (03.04.2024), <https://www.radiotavisupleba.ge/a/32889251.html>

liberation struggle and its European future. Malashkhia's activism resonated politically, as she later became the leading candidate on the "Coalition for Change" party's electoral list for the 2024 parliamentary elections.

On March 9, 2023, the ruling party, Georgian Dream, announced its decision to withdraw the proposed law to maintain peace. On March 10, 2023, the Georgian Parliament formalized this decision by voting against the bill in its second reading. The vote, which ended with 35 lawmakers opposing the bill and only one in favor, effectively annulled the legislation.

Before discussing the second time the "Foreign Influence Law" was introduced, it is important to understand the political background in Georgia during this period. On December 30, 2023, Bidzina Ivanishvili, the founder and key supporter of the Georgian Dream party, made a return to a formal role in the party by being elected its honorary chairman. Ivanishvili had previously announced in 2021 that he was leaving politics for good.

On February 1, 2024, during a party congress, Irakli Kobakhidze, the party chair, was nominated as Georgia's new Prime Minister. He replaced Irakli Garibashvili, who had resigned just days earlier on January 29. According to the Georgian Constitution, Kobakhidze needed 76 votes in Parliament to officially become Prime Minister. Since Georgian Dream held the majority of seats, his approval was almost certain.

On April 3, 2024, Mamuka Mdinaradze, the parliamentary majority leader of the Georgian Dream (GD) party, announced the reintroduction of the draft law on foreign agents, law's content remains unchanged, but the title was modified to "Organization Pursuing the Interests of a Foreign Power" instead of using the term "agent." Mdinaradze reiterated the party's stance that the bill would require organizations receiving foreign funding to publish annual financial reports, with only financial penalties for violations.¹⁷

In the parliamentary majority's statement, GD argued that the civil sector in Georgia is opaque and poses a threat to state security. The statement also accused NGOs of attempting to influence political outcomes and undermine state institutions, particularly the judiciary, through nontransparent funding.

The massive criticism from the opposition parties, the president of the International Partners, and a considerable part of the Georgian People could not stop receiving the law; the

¹⁷ <https://www.radiotavisupleba.ge/a/32889251.html>

President of Georgia voted, but as they had a majority government overridden the veto. The country's "foreign influence law" came into effect on June 4.

Georgian Dream's Frames in 2023

Statements made by leaders and members of the Georgian Dream (GD) party were examined for both 2023 and 2024, sourced from X.com, and a TV Imedi a private television and radio company in Georgia widely considered supportive of GD policies. In both years, statements from key figures such as Bidzina Ivanishvili, Irakli Kobakhidze, Irakli Garibashvili, Mamuka Mdinardze, Kakha Kaladze, Shalva Papuashvili, Nino Tsilosani, Maka Bochorishvili, Archil Talakvadze, Gia Voslki, Tea Tsulukiani, Anri Okhanashvili, Irakli Zarqua, and Beka Odisharia were analyzed.

The first and most dominant frame used by GD leaders is a **"False Campaign"**. This frame argues that the opposition to the Foreign Influence Law is built on misinformation designed to mislead the public. It emphasizes two key aspects:

Misrepresentation of the Law as 'Russian': Proponents of this frame argue that the claim comparing the bill to a 'Russian law' is entirely false." They assert that the legislation is a direct translation of the American Foreign Agents Registration Act (FARA). For instance, Mamuka Mdinardze stated: „ *"There can be no real protest based on this. When it is written in black and white that it is a direct translation of the American law, it is a copied version and still they call it Russian law. However, there are people who believe it"*¹⁸

Another dimension of the "false campaign" frame concerns the impact on beneficiaries. Opponents spread false information that the law can harm beneficiary individuals, while proponents emphasize that the law does not affect individuals in general. Mamuka Mdinardze further elaborated:

¹⁸ IMEDI News, "მამუკა მდინარაძე: როდესაც შავით თეთრზე წერია, რომ ეს კანონპროექტი ამერიკული კანონის პირდაპირი თარგმანია, მაგრამ მაინც რუსულ კანონს ეძახიან, ამის საფუძველზე არ შეიძლება რეალური პროტესტი წარმოიშვას", (06.03.2023), <https://imedinews.ge/ge/politika/283034/mamuka-mdinaradze-odesats-shavit-tetrze-tseria-rom-es-kanonproeqti-amerikuli-kanonis-pirdapiri-targmania-magram-maints-rusul-kanons-edzakhian-amis-sapudzvelze-ar-sheidzleb-a-realuri-protesti-tsarmoishvas>, <https://imedinews.ge/ge/politika/283034/mamuka-mdinaradze-odesats-shavit-tetrze-tseria-rom-es-ka>

“This does not apply to the people who are beneficiaries. We have seen in recent days how the authors of this PR and those in the vanguard have managed to reach every disabled person, beneficiary and consumer of the real goodness that comes from our partners.”¹⁹

The significance of this frame was delegitimizing opposition arguments and discrediting critics.

The second and most prevalent frame is “**Transparency and Accountability**,” portrayed as a cornerstone of democracy and a fundamental European standard, in direct contrast to opacity. This frame is reinforced by references to broader European concerns, as highlighted in Archil Talakvadze's remarks. He draws on the authority of EU findings to validate the urgency of transparency as a universal issue. He states:

“The fact that this problem - transparency and accountability - is a priority today is confirmed by the European Union’s own report. According to the Eurobarometer report, 8 out of 10 EU citizens surveyed believe that external interference, including funding from third parties, is a problem for their country and for the democracy of the European Union. Of course, this is a problem for Georgia as well, and that is why this draft law has been initiated.”²⁰

The third frame highlights the idea of a “**Softer Georgian Law**,” emphasizing that the proposed legislation is less strict compared to the U.S. version and more in line with human rights standards. Supporters of this frame argue that the Georgian law is designed to fit the country’s specific needs, avoiding the harshness and rigidity often associated with the American model.

Irakli Kobakhidze reinforces this argument, saying:

¹⁹ IMEDI News, “მამუკა მდინარაძე აგენტების ამერიკულ კანონზე”, (06.03.2023), <https://imedinews.ge/ge/politika/283048/mamuka-mdinaradze-agentebis-amerikul-kanonze-vadzlev-garantias-titoeul-benepitsiars-titoeul-im-adamians-romelsats-aqvs-garkveuli-tsukhilebi--mat-dapinansebis-shetskveta-ar-emugrebat>

²⁰ IMEDI News, “არჩილ თალაკვაძე: თავად ევროკავშირის ანგარიში ადასტურებს, რომ გამჭვირვალობა და ანგარიშვალდებულება არის პრიორიტეტი”, (16.04.2024), <https://imedinews.ge/ge/politika/333442/archil-talakvadze-tavad-evrokavshiris-angarishi-adasturebs-rom-gamchvirvaloba-da-angarishvaldebuleba-aris-prioriteti>

„ It will be a copy of the American law. I stated my position regarding this law yesterday. I am a lawyer and I can tell you that this law is the toughest.”(Irakli Kobakhidze)²¹

Similarly, Mamuka Mdinaradze stresses the need for a more tailored approach:

*“I can tell you with high probability that the American version, so directly translated and copied, will not and cannot have our support. That's what the meeting was about, and [people power] stated that they wanted to copy the American law. We also told him that he would not support the one directly copied from us, because it is really too strict, too rigid and incompatible with human rights.”*²²

The frame of **"Informed Citizens"** highlights the idea that knowledge is power and that understanding who funds organizations, what their interests are, and what drives their actions is essential for a healthy democracy. The government argues that this law is about giving people the tools they need to make informed decisions and form their own conclusions. Importance of this frame is to Reinforce the idea of personal empowerment and public awareness.

„ *"Who they are, who is funding them, and what their interests are - this information is precisely the weapon of our citizens. The government wants them to have this information in their hands as a weapon, and then they will draw their own conclusions."*(Shalva Papuashvili)²³

²¹IMEDI News, “ირაკლი კობახიძე: ჩვენ სიღრმისეულად განვიხილავთ ორივე კანონპროექტს უცხოური გავლენის გამჭვირვალობის შესახებ და მივიღებთ გადაწყვეტილებას, თუ რომელ კანონპროექტს დავუჭირებთ მხარი“, (22.02.2023), <https://imedinews.ge/ge/politika/281519/irakli-kobakhidze-chven-sigrmiseulad-ganvikhilavt-orive-kanonproeqts-utskhouri-gavlenis-gamchvirvalobis-shesakheb-da-mivigebt-gadatskvilebas-tu-romel-kanonproeqts-davuchir-ot-mkhari>

²² IMEDI News, “მამუკა მდინარაძე: უცხოური გავლენის გამჭვირვალობის შესახებ“ კანონპროექტზე“, (02.03.2023), <https://imedinews.ge/ge/politika/282489/mamuka-mdinaradze-utskhouri-gavlenis-gamchvirvalobis-shesakheb-kanonproeqtze-chemtvis-sasurvelia-qartuli-versia-gavides-radgan-aris-bevrad-liberaluri-rbili-da-emsakhureba-mkholod-gamchvirvalobas>

²³ IMEDI News, “შალვა პაპუაშვილი: ხელისუფლებას უნდა, რომ ჩვენს მოქალაქეებს მისცეს ხელში ინფორმაცია როგორც იარაღი და შემდეგ ისინი თავად გამოიგანენ დასკვნებს“, (09.03.2023), <https://imedinews.ge/ge/politika/283381/shalva-papuashvili-khelisuplebas-unda-rom-chvens-mogalageebs-mists-es-khelshi-inpormatsia-rogorcs-iaragi-da-shemdeg-isini-tavad-gamoitanen-daskvnebs>

The idea of "Transparency of Foreign Influence Law as a **“Georgian Law”** presented as a balanced and practical way to ensure transparency without creating unnecessary challenges for organizations. Supporters argue that the Georgian draft law is far less restrictive and more in line with human rights principles than the American and Russian versions.

„ I can tell you this directly as a lawyer, human rights specialist. We simply could not manage to pass such a law in the Parliament of Georgia. We could not even support the adoption of such a law. As for the Russian law, I got to know it now and it was similar to the American law. As for the Georgian draft law initiated by "People's Power", it is fully in line with human rights standards, unlike American and Russian laws.”(Irakli Kobakhidze)²⁴

Importance-Emphasized sovereignty and the customization of the law for Georgian needs, countering foreign impositions.”

"Foreign Intervention" it is emphasized that the law does not target espionage activities but is focused on regulating foreign influence within Georgia, particularly through specific organizations. This framing positions the law as a measure to counter external intervention, rather than an attack on internal security

I will not mention names, I am the chairman of the ruling party, and therefore it will be difficult for me to specify by name those people who are engaged in espionage activities in Georgia, but in general I want to reassure these people that this draft law does not deal with espionage activities, it only deals with issues of realizing foreign influence through specific organizations .” (Irakli Kobakhidze)²⁵

²⁴ IMEDI News, “ირაკლი კობახიძე: როგორც იურისტმა, ადამიანის უფლებების სპეციალისტმა შემიძლია გითხრათ, რომ „უცხოური გავლენის გამჭვირვალობის შესახებ“ ამერიკული და რუსული კანონები არის სრული კატასტროფა“, (21.02.2023), <https://imedinews.ge/ge/politika/281303/irakli-kobakhidze-rogor-ts-iuristma-adamianis-uplebebis-spetsialistma-shemidzlia-gitkhrat-rom-utskhour-gavlenis-gamchvirvalobis-shesakheb-amerikuli-da-rusuli-kanonebi-aris-sruli-katastropa>

²⁵ IMEDI News, “ირაკლი კობახიძე: ბევრი ჯაჯუში შემოთიდა ამ კანონით მაგრამ დავამშვიდებ მათ რომ სანერვიულო არაფერი აქვთ“, (23.02.2023), <https://imedinews.ge/ge/politika/281650/irakli-kobakhidze-bevri-jashushi-sheshpotda-am-kanonit-magram-dava-mshvideb-mat-rom-sanerviulo-araperi-aqvt>

In 2023, the Georgian Dream party's discussions about the Foreign Agent Law have mainly focused on framing the opposition's response as a "false campaign," which they argue is based on misinformation and misconceptions about the law. GD leaders emphasize the law's focus on transparency and accountability, portraying it as a less strict than foreign models. Despite the widespread criticism, the party aims to reassure the public that the law supports informed citizenship and strengthens democratic integrity.

Georgian Dream's Frames in 2024

The most widespread frame used by the Georgian Dream (GD) party in justifying the Foreign Influence Transparency Law is the “**Foreign Intervention frame**”. The law is presented as a necessary measure to protect Georgia from external political pressure and intervention. In this frame, the GD portrays foreign involvement in Georgian politics as excessive, with specific emphasis on foreign actors' direct engagement in domestic affairs. This is highlighted by the GD's reaction to foreign diplomats' actions during the protests in Georgia, particularly the visit of a foreign minister, which they presented as an example of foreign interference in Georgia's domestic politics.

As one GD representative stated:

"One thing is important – the excessive interference of foreigners in the law on foreign transparency shows us one thing: that this law is probably one of the most Georgian laws. Therefore, of course, the parliament will overcome this veto, because this shows once again the Georgian nature of this law. So many foreigners, who are donors and funders themselves, so many foreigners have intervened in this issue, and finally even took part in rallies. This is precisely what shows that this is one of the most Georgian laws that this parliament has adopted. So, of course, we will overcome the veto" (29.05.2024). (Shalva Papuashvili-Speaker of the Georgian Parliament)

Another key aspect connected to this frame is the "Second Front" and "Global War Party" narratives. The government propaganda claims that the "Global War Party" controls EU and US institutions, including MEPs, US Congress members, and certain Western embassies. According to the GD, the law aims to protect Georgia from foreign intervention, as the Global War Party allegedly seeks to drag Georgia into the war with Russia and open a second

front while Russia is engaged in its conflict in Ukraine. The GD further accuses political opposition, civil society organizations (CSOs), and critical media of being local agents of the "Global War Party," while positioning itself as a force for peace. In this way, the law is portrayed as a crucial safeguard for Georgia, protecting the country from being drawn into a war. As Kakha Kaladze, the Secretary General of the GD and Mayor of Tbilisi, asserted during a 23.05.2024 speech:

“A few days ago, the foreign minister of one country, who participated in an anti-government rally, is this normal? Is this our pride? Well, in a normal, developed country, what would have happened to that foreign minister? They should fight a war in their country and open a second front, leave Georgia alone. Today, we need peace, friends, and partners. We need healthy relationships, and Georgia is ready for that, but the attitude that our country should be used for someone else's interests, and that the same situation should be here as in Ukraine, is not acceptable.”

“Sovereignty/ National identity” " is a key frame the (GD) uses to explain why the “On Transparency of Foreign Influence” law is important. The GD believes that this law is necessary to protect Georgia’s independence and national identity, which they feel are being threatened by foreign involvement and internal political groups. The GD also highlights the need to protect in terms of national identity -Orthodox Church, which is seen as a core part of the country’s culture and spirituality.

Bidzina Ivanishvili, the leader of the Georgian Dream, has repeated these points in his public speeches, especially during a rally of his supporters. He mentioned Indian leader Jawaharlal Nehru’s quote, saying, “There is no greater enemy to one’s country than a pseudo-elite nurtured by a foreign power.”²⁶ Ivanishvili described these "pseudo-elites" as people who are disconnected from the Georgian people and are controlled by foreign powers to serve outside interests. He argued that these individuals do not care about Georgia but are instead following foreign agendas.

Ivanishvili also said that he will fight to fully restore the sovereignty of Georgia

²⁶ IMEDI News, “ბიძინა ივანიშვილის სიტყვით გამოსვლას საყოველთაო სახალხო შეკრებაზე. სრულად“, (29.04.2024), <https://imedinews.ge/ge/politika/335523/bidzina-ivanishvilis-sitkvit-gamosvla-sakoveltao-sakhalkho-shekrebaze-srulad>

So, the “On Transparency of Foreign Influence” law is presented not only as a way to protect Georgia's political independence but also to safeguard its cultural and religious identity. It is seen as a defense against foreign-backed radical ideas, attacks on the Orthodox Church,.

As Mamuka Mdinardze stated : *When they say that we have problems with Europeans due to the Law on Family Values and the Protection of Minors, Europe should accept us as we are. We have our own character. We recognize our friends, we recognize them, but Georgians have our own identity, character, culture, mentality, which we will not and cannot allow to be erased. Neither our future nor the Georgian people will forgive us for this. We should not enter Europe, but Europe together with Georgians, this is our correct attitude because Georgians are the architects of Europe among them with their past, democracy, centuries-old democratic, European, Christian history”*²⁷

The third frame used by the Georgian Dream (GD) to justify the “On Transparency of Foreign Influence” law is the “**Opaque/Radical NGO**” frame. This frame suggests that NGOs in Georgia are often not transparent and are funded by foreign powers. The GD claims that these NGOs use "black money" to carry out anti-state actions, spread propaganda, and try to change the government through revolutionary tactics. Often emphasized regarding the NGO sector, which is involved in political activities, there is no line between NGOs and political parties.

The GD argues that NGOs funding are not acting in Georgia's best interest. Instead, they are seen as promoting foreign agendas, not Georgian people interest. By using the lack of transparency in these organizations, the GD believes the law is necessary to ensure that NGOs are open about where their money comes from and what activities they are involving. the Georgian Dream has often described certain NGOs as "rich NGOs"

²⁷ IMEDI News, “მამუკა მდინარაძე: ევროპამ უნდა მიგვიღოს ისეთი, როგორებიც ვართ, ჩვენ მეგობრებს ვცნობსთ, ვაღიარებთ, მაგრამ ქართველებს გვაქვს ჩვენი იდენტობა, ხასიათი, კულტურა, მენტალობა, რომლის წაშლას არ და ვერ დავუშვებთ“, (22.04.2024), <https://imedinews.ge/ge/politika/334443/mamuka-mdinaradze-evropam-unda-migvigos-iseti-rogorubits-vart-chv-en-megobrebs-vtsnibt-vagiarebt-magram-qartvelebs-gvaqvs-chveni-identoba-khasiati-kultura-mentaloba-romlis-tsashlas-ar-da-ver-davushvebt>

“This is the fight of the “National Movement” and their patrons for black money. This is the fight of the radical part of the NGO sector, of those representatives who feed on this black money, otherwise if transparency is ensured, then there is nothing to fight for here. Then they will simply quietly, calmly, law-abidingly fill out the declaration of the previous year in January of each year and everything will end with that. If they don’t do this, that’s why they are fighting so hard, that’s why they are harassing the whole world. This fight for black money, I promise that it will end with their defeat.”²⁸

The frame of the “False Campaign” remained a key narrative in 2024, just as it was in 2023. This frame was used by the Georgian Dream (GD) to argue against claims that the “On Transparency of Foreign Influence” law is a **“Russian law.”** Although the frequency of this narrative decreased compared to the previous year, it continued to play a significant role in shaping public opinion about the law. In 2024, the GD focused more on the argument that the law would not hinder Georgia’s European Union (EU) accession process.

The GD emphasized that transparency is a core **“European and democratic value”**, so the law aligns with European principles rather than opposing them. According to this narrative, accusations that the law is anti-European or inspired by Russian practices are part of a false campaign, and the aim is to mislead the public and presented that transparency is European standard which can not be Russian.

“I will repeat once again that, for me, Europe means transparency and accountability to society. The Georgian government has already established the European standard of transparency. Now is the time for NGOs and their donors to become European, and the Law on Transparency of Foreign Influence will undoubtedly provide them with significant assistance in this regard.”²⁹

²⁸ IMEDI News, “მამუკა მდინარაძე გამჭვირვალობის კანონპროექტზე“, (06.04.2024), <https://imedinews.ge/ge/politika/332000/mamuka-mdinaradze-gamchvirvalobis-kanonproektze-kvelas-vtkhovt-gansakutrebti-megobrebs-nu-dagvishlian-da-tits-nu-dagvigneven-iset-rameze-rats-tavistan-aqvt-rasats-tavistan-a-registrirben>

²⁹ IMEDI News, “პრემიერი: საქართველოს მთავრობამ უკვე დაამკვიდრა გამჭვირვალობის ევროპული სტანდარტი, ახლა კი დროა არასამთავრობო ორგანიზაციები და მათი დონორებიც გაეცნობოდნენ“, (03.04.2024), <https://imedinews.ge/ge/politika/331603/premieri-saqartvelos-mtavrobam-ukve-daamkvidra-gamchvirvalobis-evropuli-standarti-akhla-ki-droa-arasamtavrobo-organizatsiebi-da-mati-donorebits-gaevropuldnen>

Peoples' Power frames

In the case of People's Power, Facebook and TV Imedi served as the primary sources for speeches, statements, and interviews. Since Georgian Dream (GD) and People's Power shared similar dominant frames during both periods, the law was framed as a protection of "sovereignty" and a security necessity, as was the case with GD. However, the difference lay in how this framing was expressed. People's Power articulated it more openly, directly blaming the West and accusing it of attempting to drag Georgia into the war. People's Power made this comparison more frequently than the Georgian Dream.

*"The Baltic countries act to protect their own interests, if the war has to go somewhere, they prefer it to be in Transcaucasia, namely in Georgia, than in their own country."*³⁰

It should be noted that the law has been supported by Russian ultra-nationalist ideologist Alexander Dugin, who praised Georgia's pursuit of sovereignty, viewing it as aligning with Russia's political ideals. Sergey Lavrov, Russia's Minister of Foreign Affairs, also argued that the law is more lenient than similar legislation in the U.S., France, and Poland.³¹ Regarding the law, Russian President Vladimir Putin's press secretary, Dmitry Peskov, stated that "nothing there was inspired by the Kremlin, the Kremlin has absolutely nothing to do here."³²

President's Frames in 2023

³⁰ სალხის ძალა/People's power, Facebook Video, 25 May 2024, https://fb.watch/x06_5PLLtd/

³¹ Netgazeti, "საკმაოდ ლმობიერია"- ლავროვი "ოცნების" რუსულ კანონს იცავს", (19.04.2024), <https://netgazeti.ge/life/718789/>

³² Salome Zourabichvili, https://president.ge/index.php?m=210&news_id=1819&lng=eng

Framing analysis plays a crucial role in uncovering the underlying messages of political actors. In this case, it helps reveal the messages conveyed by political actors, such as President Salome Zourabichvili, through their speeches, statements, and actions.

President Salome Zourabichvili's statements are primarily sourced from press releases published on president's official webpage; interviews shared on her Facebook platform, and posts on X (formerly Twitter). A total of 80 statements form the foundation for the framing analysis presented in this chapter.

In 2023, the most dominant frame positioned the initiated bill as **"threat to Georgia's European Future"**

The president highlighted that this law was critical for Georgia's European integration. She emphasized that in 2022, Georgia was not granted EU candidate status. However, in 2023, the country had a unique opportunity to move closer to the European Union alongside Ukraine and Moldova. The president noted that the Georgian people were overwhelmingly opposed to this law, as it contradicted their aspirations for a European future.

The population called on the government to fulfill the 12 recommendations set by the EU, which are vital for Georgia to secure candidate status. According to the president, this law directly threatened the spirit and content of those 12 recommendations.

Presidential Administration Statement on Proposed Legislation and the European Future of Georgia:

*"At a critical juncture when the evaluation of the implementation of the 12 recommendations of the European Commission is underway and the events of February 24 intensify the urgency of the European future for all three countries of the associated trio, it is regrettable that one political group has chosen to propose a new law. The content of this proposed legislation appears to deviate from the path towards Europe and align more closely with the problematic model of Russia."*³³

³³ Salome Zourabichvili, https://president.ge/index.php?m=212&news_id=1842&lng=geo&fbclid=IwY2xjawHIEP1leHRuA2FlbQIxMAABHQasGLxINTWrZnPhYKsPT_6HltzQPZ6exkHa_84TvJqeHrJ9OgCx5HkeQ_aem_eckdRt7_0Mz_yER2UuKy1A

Another leading frame is the law being **“Against the Constitution”** The proposed law directly contradicts the Constitution of Georgia, which requires all constitutional bodies to take every necessary step to ensure Georgia’s full integration into the European Union and NATO. As the guarantor of the Constitution, President Salome Zourabichvili has made it clear that she will not allow anyone to prevent Georgia from pursuing its European future. She emphasized that this future belongs to the people of Georgia, especially the younger generations. It is shaped by their ancestors' sacrifices and built in the present. The president stressed that no one has the right to take away this future or create obstacles to Georgia's European aspirations.

"I'm only interested in this constitution that I'm the guarantor of. And this very constitution reads that all institutions and myself in the first place, but also the government and the authorities, have to do everything to lead this country into Europe, to secure our path of Euro integration." .³⁴

Another dominant frame is **“Control Civil Society”** The law can be seen as an "Attempt to Control Civil Society." Its main goal seems to be targeting NGOs and individuals who receive foreign grants for various issues. Anyone who knows Georgia's history of democratic development over the past 30 years can see that our progress has been supported by European and American partners, as well as international donor organizations. This law threatens not just NGOs but anyone involved in this process.

It resembles law adopted in Russia which raises concerns about its alignment with democratic values. This is not the kind of law you would expect from a European country. President Zourabichvili has made it clear that the government has one last opportunity to reconsider the law, especially since the Venice Commission, society, and our Constitution all say that this law is unacceptable. The main question is whether this law was introduced to hinder Georgia’s European integration or to gain better control over non-governmental organizations, especially with the upcoming 2024 elections in mind, suggesting it might be more of an electoral strategy. Without input from those who initiated the law, it’s hard to draw clear conclusions. However, as President, I firmly believe this law is both unacceptable and

³⁴Salome Zourabichvili, https://president.ge/index.php?m=212&news_id=1842&lng=geo&fbclid=IwY2xjawHIEP1leHRuA2FlbQIxMAABHOasGLxlNTWrZnPhYKsPT_6HltzOPZ6exkHa_84TvJqeHrJ9OgCx5HkeO_aem_eckdRt7_0Mz_yER2UuKy1A

harmful, particularly at a time when the future of our country's European aspirations is on the line.

„ This is an attempt to control civil society because its clear aim is to register NGOs or any individual who receives foreign grants on various issues. Anyone who knows Georgia knows that for the last 30 years, our democratic building has been supported by our European and American partners and various international donor organizations. So, this could affect anyone [or any organization) ”³⁵

President's Frames in 2024

only one dominant frame remained consistent from 2023 to 2024: “Threatening Georgia's European Future.” The other four frames were newly introduced during this period.

The most dominant frame was “**Russian Law.**” This frame shows the similarity between the Georgian Dream's (GD) purpose in proposing the law and Russia's purpose in adopting similar legislation: suppressing dissent, limiting freedom of expression, and undermining the autonomy of NGOs and media outlets. Framing the Georgian legislation as “Russian” also served to mobilize citizens against the law by highlighting imminent threats to democratic values and freedoms.

“Whether it was dictated or not, it is a copy of the Russian law, which became the basis for restricting the autonomy of NGOs and the media in Russia. With the help of a similar law, Russia was able to subordinate all NGOs and limit the activities of international organizations. This is precisely the purpose of this law. Behind this law, which has become a symbol of the direction taken by the government, there are other laws that are in the same direction and radically contradict the EU's requirements for starting accession negotiations by the end of the year. This worries the population. There is a focus on the law, which is a symbol, a Russian law, but in reality there is great concern about the direction taken by the "Georgian Dream" and its leader ,Bidzina Ivanishvil” (2.05.2024) ”³⁶

³⁵ Salome Zourabichvili,
https://president.ge/index.php?m=212&news_id=2190&lng=geo&fbclid=IwY2xjawG9jltleHRuA2FlbQIxMAABHes-sxbVd3VuVdb0yy-7juxcD13KkojDi2rstm8c9Dw976Ey-_RCHjwaqQ_aem_C0W54Z5puEB8P-dXA0qvl_g

³⁶Salome Zourabichvili,
https://president.ge/index.php?m=212&news_id=1842&lng=geo&fbclid=IwY2xjawHIEP1leHRuA2FlbQ

The most dominant frame can be described as **"Election as a Referendum."** This frame suggests that the President characterized the 2024 parliamentary elections in Georgia as a choice between the ruling party, Georgian Dream (GD)—representing Russia—and the opposition parties—representing Europe. The importance of this frame is that it represents an election pivotal moment, urging voters to consider their aspiration with the EU while voting..

*"The elections are not about choosing the ideal or the best for you. Today's elections are not about "whom do I choose?" but rather "what do I choose?"—the country, independence, the future, success, progress, Europe, or do I choose regression and the old system that we know well, which occupies 20% of our country?"*³⁷

*"We have a quasi-referendum on the choice between Europe and a return to an uncertain Russian past"*³⁸

The last Dominant frame is **"Foreign Influence Law vs Georgian Charter"**

In response to the law's adoption, the President introduced the Georgian Chapter, an idea to unite pro-European political parties under one umbrella; this was framed as a response and solution to the adopted foreign influence law. The president introduced the Georgian Chapter as a Path to Opening EU Negotiations for Georgia. The President repositions the debate around European values and aspirations by framing the Georgian Chapter as a direct response to the law.

As highlighted in the press release issued on July 11, 2024, following discussions between the President of Georgia and Uzra Zeya, Deputy Secretary of State of the United States, the President emphasized: “ The Georgian Chapter brings together pro-European political forces under a unified action plan, ensuring that Georgia fulfils its obligations and returns firmly to its European path. This initiative represents a vital step in addressing recent anti-democratic setbacks and safeguarding the aspirations of the Georgian people.”³⁹

[IxMAABHQasGLxINTWrZnPhYKsPT_6HltzQPZ6exkHa_84TvJqeHrJ9OgCx5HkeQ_aem_eckdRt7_0Mz_yER2UuKy1A](https://www.president.ge/index.php?m=212&news_id=2289&lng=geo)

³⁷ Salome Zourabichvili, https://president.ge/index.php?m=212&news_id=2289&lng=geo

³⁸ Salome Zourabichvili, https://president.ge/index.php?m=206&appeals_id=414&lng=eng

³⁹ IPN ინტერპრესნიუსი, “ „ქართული ოცნება“ ცდილობს „რუსული კანონი“ აამოქმედოს და სრულიადნ ხელოვნური ბარიერები შექმნას, რომ არჩევნებზე დაკვირვება არ მოხდეს“, (30.09.2024), <https://www.google.com/search?client=safari&rls=en&q=xoshtaria-kartuli-ocneba-cdilobs-rusuli-kanoni-aamok-medos-da-sruliad-xelovnuri-barrierebi-shekmnas-rom-archevnebze-dakvirveba&ie=UTF-8&oe=UTF-8>

Opposition parties frame's 2023-2024

In case the opposition parties, the source were Facebook, X.com and Media TV Pirelli, Mtavari Arkhi.

The analysis focused on the narratives framed by Girchi—More Freedom, For Georgia, Ahali, Droa, the United National Movement (UNM), and Lelo for Georgia. Examined speeches and statements sourced from private media outlets such as Mtavari Arkhi, TV Pirveli, and their official Facebook pages. This analysis covers the period from March-April 2023 to April-October 2024.

“United National Movement (UNM)”: Founded in October 2001 by Mikheil Saakashvili, the UNM rose to prominence following the Rose Revolution in 2003, which led to the ousting of then-President Eduard Shevardnadze. The party governed Georgia from 2004 to 2012 and has since been a significant opposition force.

“For Georgia”: Established by former Prime Minister Giorgi Gakharia in 2021, Gakharia's leadership aims to provide an alternative to the existing political establishment.

“Girchi – More Freedom”: Founded by Zurab Japaridze in late 2020, following a split from the New Political Center – Girchi. The party advocates for individual freedoms, economic liberalism, and minimal government intervention.

“Lelo for Georgia”: Co-founded by Mamuka Khazaradze and Badri Japaridze in 2019, Lelo focuses on economic development, social justice, and European integration.

“Ahali”: Co-chaired by Nika Gvaramia and Nika Melia, Ahali is a progressive party emphasizing democratic reforms and anti-corruption measures.

“Droa”: Founded by Elene Khoshtaria, Droa emphasizes human rights, rule of law, and European integration.

“Girchi”: More Freedom, Ahali, Droa, and the Republican Party formed the Coalition for Change for the parliamentary election.

Opposition parties had the same frames regarding the law such as : “Russian law”, “Election like a choice between Europe and Russia”, “Threatening Georgia’s European Future”,

“against the constitution” which is discussed in case of president’s frame and their meaning in case of opposition parties were the same.

After the “Russian law” “Threatening Georgia’s European Future” and “elections frame” **“Maintain Power”** is one of the most widespread frames within the opposition parties.

The opposition argues GD introduced the "Russian law" because they fear losing their hold on power. It is a move to suppress dissent, undermine the credibility of civil society, and disrupt electoral transparency.

Importance: It appeals to citizens who value free elections and democratic accountability, encouraging them to oppose the law.

"Georgian Dream" is trying to implement the "Russian law" and create completely artificial barriers to prevent the election from being observed." (Elene Khoshtaria Droa" 30.09.2024⁴⁰

"The main target of the 'Russian law' at this stage are the organizations that monitor the elections. Ivanishvili sees that he will lose the upcoming elections and will not be able to maintain power without using Russian methods!" (Zurab Chiaberashvili, UMN) ,⁴¹

Another dominant frame is “ **Blurring lines**” meaning of this frame is that putting Friends and Enemies on the Same Level. the "Blurring Lines" frame underscores fears that equating allies with adversaries through legislation could jeopardize Georgia's foreign relations and democratic trajectory.

Importance: By framing opposition, it tries to convince society that it Undermines Strategic Relationships Equating friendly foreign entities with hostile ones could harm Georgia's diplomatic relationships and deter international support, potentially isolating the country at a critical development.

“The biggest “Russianness” of this law is that it puts our country’s enemy and official allies on the same level.” (Ana Buchukuri For Georgia 7.04.2024)

⁴⁰ ერთიანი ნაციონალური მოძრაობა/United National Movement, Zurab Chiaberashvili, Facebook Video, (29.05.2024) <https://www.facebook.com/watch/?v=1128177001777963>

⁴¹ TV პირველი, “ ქართველი ხალხის მხარდამჭერი აქტი“- ბადრი ჯაფარიძე ბლინკენის განცხადებაზე“, (24.05.2024), <https://tvpirveli.ge/ka/siaxleebi/politika/70740-qartveli-khalkhis-mkhardamcheri-aqti-badri-japaridze-blinkenis-gantskhadeba>

The **"Interest of Russia"** frame means, as part of a broader strategy aligned with Russian geopolitical interests, that this law serves Russia's strategic goal of isolating Georgia from its friends and hindering its development.

The importance of this frame is to show society the possibility of losing their freedom and European future.

“the Georgian Dream, serving the strategic goal of Russia, isolates Georgia from its friends, hinders its development, introduces Russian style authoritarianism and provokes civic confrontation. “ (Statement of For Georgia 27.04.2024)

“Since today we have a Bolshevik government, "Dream" politicians in the service of Russian interests, and a founder of this party who completely ignores the democratic aspirations of the Georgian people” (Badri Japaridze)⁴²

U.S and EU frames

Statements from the U.S. Embassy and EU representatives were analysed. In the case of the U.S., there are two main frames: "No Similarity with FARA" and "Against Georgia's EU Aspirations."

The first frame, "No Similarity with FARA," suggests that the Foreign Agents Registration Act (FARA) is a narrow law that does not stigmatize individuals. The opposition parties and the president also describe the foreign influence law as Kremlin-inspired. By referring to FARA, the U.S. aims to highlight how Georgia's law is far more restrictive and could negatively affect Georgian citizens, particularly those involved in advocacy or defending democratic values.

⁴² U.S. Embassy in Georgia, “NED price on Foreign Agent Law”, Excerpt from Department press briefing, (2 March 2023), <https://ge.usembassy.gov/ned-price-on-foreign-agents-law/>

Importance of this frame: This frame is important because it draws a clear distinction between FARA, a law aimed at foreign influence, and Georgia's broader, more oppressive foreign influence law.

"Our Foreign Agents Registration Act requires people who are agents of foreign governments to register as such. Our law does not affect NGO operations or funding sources. We can provide you with additional details on FARA if that would be of use. But FARA is very narrow; it is tailored to apply only to those agents of foreign government. This is something very different, and that's why we're quite concerned about it." (Ned Price 2.03.2023)⁴³

The second frame, "**Against Georgia's EU Aspirations**," presents the concern of the U.S. that the Georgian government's actions, particularly the introduction of the foreign influence law, are hindering Georgia's prospects for closer integration with the European Union.

Importance of this frame: It stresses that the foreign influence law, are not only harmful to democratic values but also put Georgia's future in the EU at risk.

"I am deeply concerned that in recent weeks the Georgian government's choices have moved the country away from its Euro-Atlantic future, a destination desired by the overwhelming majority of Georgians. Unfortunately, the ruling party appears determined to advance legislation that the EU has clearly said is incompatible with Georgia's EU aspirations. Additionally, some in the ruling party have chosen to attack the greatest supporters of Georgia's sovereignty, the United States and the European Union" (AMBASSADOR DUNNIGAN 2.05.2024)⁴⁴

EU leader's speeches were analysed: Charles Michel Ursula von der Leyen, Pawel Herczynski,

Josep Borrell Fontelles, the main frame is that the law is bringing "**Against Georgia's EU Aspirations**," Moreover, they highlighted that Georgia has a historic opportunity, and the government should follow the interests of the Georgian people.

⁴³ U.S. Embassy TBILISI, Statement from ambassador Dunningan, (2 May 2024), <https://ge.usembassy.gov/statement-from-ambassador-dunnigan/>

⁴⁴ Delegation of the European Union to Georgia, "Welcome remarks of the Ambassador Pawel Herczynski at CSF conference EU Enlargement - A Geopolitical Necessity and the Next Steps for the EU Candidate States", (09.07.2024), https://www.eeas.europa.eu/delegations/georgia/welcome-remarks-ambassador-pawel-herczynski-csf-conference-eu-enlargement-geopolitical-necessity-and_en?s=221

The frame "**Against Georgia's EU Aspirations**," highlights the concern from EU leaders that introducing the foreign influence law and other government actions are jeopardizing Georgia's path toward European integration. This frame draws attention to the historical opportunity that Georgia has to secure a place within the EU, but it emphasizes that foreign influence laws are actively undermining these aspirations.

"This is a window of opportunity that each aspiring candidate country should seize. This also applies to Georgia, where we have unfortunately seen negative developments lately, including intimidation of civil society representatives and widespread disinformation against the EU and its values. Last week, the EU leaders were very clear: If the government won't change its direction, Georgia will not progress on its EU path." Ambassador Pawel Herczynski(09.07.2024)⁴⁵

*European Union is open. But if the government continues on the same track, continues doing what they are doing, this door will be closed.*⁴⁶ (Josep Borrell)

Based on the framing analysis, the opposition parties, international partners, and the president's side most frequently compared the Georgian law with the "Russian law." At the same time, GD party and People's Power emphasized its similarity to the "FARA" (Foreign Agents Registration Act). Writing about these laws separately allows for a deeper analysis of the possible impact of the Georgian law.

The Russian Foreign Agent law (RFAL)

In 2012, the Russian government adopted The Russian Foreign agent law (RFAL) which sought to prevent foreign influence in Russia and weaken opposition against Russian authorities. Initially, mentioned law was passed as a response to massive anti-governmental protests in Russia in December 2011. Then-Prime Minister Vladimir Putin attributed Such large-scale protests to the foreign interference and influence campaigns. RFAL was an

⁴⁵ EEAS Press team, "Foreign Affairs Council: Press remarks by High Representative Josep Borrell upon arrival", (24.06.2024),

https://www.eeas.europa.eu/eeas/foreign-affairs-council-press-remarks-high-representative-josep-borrell-upon-arrival-19_en

⁴⁶ Digges. C., 20 October 2015; <https://perma.cc/MM6H-VWCL>;

essential legal tool for the Russian government to combat opposition since subsequently, in a short period of time it led to the closure of many NGOs in the country. In particular, after the implementation, the law forced more than 30% of the Russian NGOs to close by 2015.⁴⁷

Overall, based on the consolidated version of RFAL any NGOs, media outlets or individuals that take part in “political activities” should be registered as a foreign agent. It should be noted that initially the law did not oblige all mentioned persons to be registered. However, eventually the scope of the requirement extended and included almost every individual, commercial or non-commercial legal entity which receives money from foreign sources and express different opinions.

To begin with, in 2012, after the law was passed, every NGO in the country were required to register with the Ministry of Justice if they were getting foreign funding, with no minimum and were engaged in “political activity”.⁴⁸ The term “political activity” was broadly defined. Specifically, under the law it included any activity which sought to influence the policy of government entities, either in a direct way or by impacting public opinion. Definition did not include activities in relation to science, healthcare, culture, art, providing social support for citizens and etc.⁴⁹ based on the initial version of the law, registered NGOs should fulfill following requirements: label public materials and highlight that it was originated from a foreign agent, provide biannual activity reports, quarterly spending reports, annual audits and also allow unscheduled audits based on the government’s decision.⁵⁰

The RFAL also includes provisions based on which the government has the right to impose fine, probation, imprisonment or forced labor in case of failing to register or violating the requirements.⁵¹

At the beginning many NGOs refused to register, even though the law included above-mentioned punishments. As a response the government amended the law and extended the scope and also conducted stricter activities.

⁴⁷ Foreign Agent Law, supra note 3, (2012); Orlova, supra note 7, 393–94, in “FARA in focus: what can Russia’s Foreign Agent Law tell us about America’s”, Samuel Rebo, (2021): 284;
https://jnslp.com/wp-content/uploads/2022/02/Fara_in_Focus_2.pdf;

⁴⁸ Foreign Agent Law, supra note 3, art. 2(2), (2012), in, “FARA in Focus: what can Russia’s Foreign Agent Law tell us about America’s”, Samuel Rebo, (2021):284;
https://jnslp.com/wp-content/uploads/2022/02/Fara_in_Focus_2.pdf;

⁴⁹ Foreign Agent Law, supra note 3, art. 2 (4)-(5), (2012), in “FARA in Focus”, Samuel Rebo, (2021):284;
https://jnslp.com/wp-content/uploads/2022/02/Fara_in_Focus_2.pdf;

⁵⁰ Foreign Agent Law, supra note 3, art. 3(2), 2012, in “FARA in focus”, Samuel Rebo, (2021):284;

⁵¹ Callahan, supra note 7, at 1244, (n.d.), cited in “FARA in focus”, Samuel Rebo, (2021):285;

For instance, in 2013, based on the Vladimir Putin's statement that foreign powers were going to use many instruments to pressure Russia including "soft-power" tools⁵², the Ministry of Justice of Russia, inspected some NGOs which were considered to be compatible for the foreign agent criteria established in the law. Specifically, the ministry required NGOs to register under the law or otherwise they would be subject to prosecution. As a result, many NGOs which were carrying out activities for the protection of human rights, environment or working on public outreach were really pressured by the Russian government.

For instance, according to the Human Rights Watch, "Golos Association" which monitored the elections in Russia and also aimed to raise voter awareness, was accused of violating foreign agent law and as a response was fined several times. For instance, according to the Ministry of Justice, the organization drafted and promoted unified electoral code that was considered as a political activity, besides the association was accused of receiving the foreign funding from the Norwegian Helsinki Committee. Even though, at the court hearing, the defense stated that the association told the Norwegian Helsinki Committee that it did not wish to receive monetary award and it asked the bank to return funds before it was transferred to the account of organization, the Court still found the Golos guilty and fined it.⁵³ based on the mentioned information it can be stated that since the Golos is a leading election watchdog in Russia, it has a very essential role regarding the monitoring and evaluating the process of elections, the fact that it promoted unified electoral code can be considered as one of its activities which sought to make some improvements in relation to the transparency and fairness of elections process. However, within the broad definition of "political activities" such an act was arbitrarily considered as the interference in political processes.

It should be noted that, the severe pressure on Golos association still continues as in 2024, its co-chair was detained on the accusation of "organizing activities of an undesirable organization" under the criminal code of Russia.

Apart from this association, other essential NGOs like "Memorial" which conducted anti-discrimination activities or "Public Verdict Foundation" that was a police-reform organization, were subject of intense pressure and harassment.⁵⁴ subsequently, the label of

⁵² Human Rights Watch, (25 June 2013),
<https://www.hrw.org/news/2013/06/25/russia-harsh-toll-foreign-agents-law>;

⁵³ Human rights Watch, (25 June 2013),
<https://www.hrw.org/news/2013/06/25/russia-harsh-toll-foreign-agents-law>;

⁵⁴ Martin Russel, European Parliament, "Foreign agents' and 'undesirables' Russian civil society in danger of extinction?" (March 2022):4,
[https://www.europarl.europa.eu/RegData/etudes/BRIE%2F2022%2F729297/EPRS_BRI\(2022\)729297_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE%2F2022%2F729297/EPRS_BRI(2022)729297_EN.pdf);

foreign agent was applied to broader types of NGOs. In particular, requirements of the law applied also to the NGOs which were tackling with environmental issues, HIV prevention, domestic violence and etc. and did not have any connection with the political matters.⁵⁵

In 2014, Russian government made two major amendments to the foreign agent law, based on which the Ministry of Justice was granted the right to register NGOs as foreign agents without their prior consent.⁵⁶ Additionally, in order to further limit the activities of NGOs, based on the amendments, organizations were prohibited to take part in electoral or referendum campaigns, or to engage in a contract with or finance any political parties.⁵⁷

In 2015, government of Russia made new amendment, which granted the registered NGOs the right to petition the court to remove themselves from the list of foreign agents. Such a tool for NGOs had not existed before, many of them exercised this right and by 2017 more NGOs were removed from the registration list than registered as an agent.⁵⁸ In order to hinder this process subsequently the scope of the law was further extended and more NGOs were required to register as foreign agents.

In addition, it is important to briefly note that after making mentioned amendment, in 2015, Russian government adopted new law, based on which prosecutor-general was allowed to determine foreign or international organizations as “undesirable” without the judgement of the court. More specifically, undesirable organizations are considered to be threats for constitutional order of Russia, its security and defense. Engaging in the activities of such organizations constitutes a criminal offence and may even result in punishments like imprisonment up to six years.⁵⁹

It is quite clear that in the course of time Russian government put in a lot of effort to prevent any foreign influence or opposition in the country. Mentioned law regarding undesirable organizations also include some unclear definitions and provisions which makes it possible to interpret in broader way and include every entity irrespective of their field of activity. Even though, as it was previously mentioned, definition of “political activities” include some

⁵⁵ Russel. M., March 2022, European Parliament, p. 4,
[https://www.europarl.europa.eu/RegData/etudes/BRIE%2F2022%2F729297/EPRS_BRI\(2022\)729297_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE%2F2022%2F729297/EPRS_BRI(2022)729297_EN.pdf);

⁵⁶ USA, Foreign Agent Law, (2014), supra note 50, cited in “FARA in focus”, Samuel Rebo,(2021): 286;

⁵⁷ Rebo (2021):286;

⁵⁸ Skibo, supra note 41, (n.d.), in Rebo, (2021): 286;

⁵⁹ Martin Russel, European Parliament, “Foreign agents' and 'undesirables' Russian civil society in danger of extinction?”, (March 2022):7;

exemptions, like science, healthcare and etc., when the non-political entity criticizes the policy of the government, based on the definition it is possible to consider them as foreign agents.

In 2017, government made new changes to the foreign agent law and expanded its scope. RFAL's requirements additionally applied to media companies. According to the initial statements, mentioned changes would only apply to U.S. media outlets in Russia. However, it should be noted that the law did not differentiate origins or nationalities therefore, its regulation can apply to any media company that accepts foreign funding.⁶⁰

After the prosecution of Russian citizen, Maria Butina by the U.S. DOJ in 2019, the Russian government further amended the law and established that every individual or media company that receives foreign funding and publishes information on mass media should register as a foreign agent.⁶¹ Based on this amendment, the scope of foreign agent law included not only entities but individuals as well.

Further amendments were made in 2020, which extended the scope of the law and imposed new prohibitions. In particular, amendments added penalties for media outlets which publish information regarding the foreign agents without stating their status of agent under the law, also those changes prohibited foreign agents to work in any state or local government bodies. Besides, some new audit requirements were added and the scope of the definition of foreign agent was further expanded which included NGOs which receive money or property from foreign agents or intermediaries of those agents.⁶²

The definition of "foreign agent" significantly altered and extended in 2022. In particular, the government adopted new law "Control Over activities of Entities/Persons under Foreign Influence", based on which the definition of foreign agent was simplified and further extended. It included every Russian, foreign or stateless person, any domestic or international legal entity, any group without registration, in case they receive foreign support or are under the "foreign influence" and engage in activities which are considered to be political by Russian government. Definition also include persons that collect information about Russia's military activities or abilities, disclose such information or funds such activities.⁶³

⁶⁰ Foreign Agent Law, supra note 58, art. 2., (2017), cited in Rebo (2021):287;

⁶¹ Foreign Agent Law, supra note 61,(2019), cited in Rebo, (2021):287;

⁶² Rebo, (2021): 287;

⁶³ Human Rights Watch, December 1 2022,

<https://www.hrw.org/news/2022/12/01/russia-new-restrictions-foreign-agents>;

The term “foreign influence” is also quite broad and can be interpreted arbitrarily by the Russian government. Specifically, mentioned law passed in 2022, defines the foreign influence as a support from foreign sources that include funding, technical assistance or other kind of assistance.⁶⁴

Apart from broad definitions, strict sanctions and arbitrary interpretations, new laws of the Russian government exclude foreign agents from engaging in various activities or events. In particular, they are banned from taking part in electoral commissions, electoral campaigns, educational activities for minors and etc.⁶⁵

It can be concluded that current laws of Russia regarding the foreign agents, include every NGO, legal person or individual that are financed or in other ways supported by the foreign source.

It should be noted that adopting the foreign agent law was often legitimized by the Russian government on the ground that it is similar to the USA law, “FARA”. However, it is obvious that there are significant differences between these two and the approaches of Russia and USA. While USA law regarding foreign agents, focuses on public disclosure and does not prohibit any political activities or their engagement in any social events, the Russian foreign agent law severely breaches fundamental rights of persons based on the reason that they promote opposite opinions and are supported by the foreign powers.

In the 2024 recent landmark ruling of the European Court of Human Rights (ECHR), the Russia’s foreign agent law is identified as “arbitrary”, used in “overly broad and unpredictable way”. The ECHR stated that this law imposes severe restrictions and breaches the fundamental rights of persons.⁶⁶

Foreign Agents Registration Act (“FARA”)

FARA is a primary statute of the USA which seeks to regulate and disclose foreign influence in the country. The history of the statute has its roots in 1930s, prior to the World War II,

⁶⁴ Human Rights Watch, December 1 2022;

⁶⁵ Human Rights Watch, December 1 2022;

⁶⁶ Radio Free Europe, Radio Liberty October 22 2024,

<https://www.rferl.org/a/echr-condemnation-russia-foreign-agent-law-human-rights-violation/33167947.html>;

when foreign propaganda intensified in the U.S. Specifically, in 1935, 73rd Congress's Committee on Un-American activities issued a report which presented evidence of persons who were promoting fascist and communist propaganda in the interest of foreign political parties or governments.⁶⁷ Besides, during that time, considering the threats that had been imposed on foreign governments and political and economic unrest, Congress deemed necessary to monitor the foreign influence efforts on the U.S. government.⁶⁸

The FARA was enacted in 1938 and initially it was notably passed in order to combat NAZI propaganda activities which also included 20,000 person NAZI rally at a Madison Square Garden.⁶⁹ According to the original idea of the statute, it should not prohibit to conduct any political activities, instead it should mainly focus on public disclosure. Specifically, the statute seeks to ensure the public disclosure of foreign influence in the U.S. by registering individuals. More specifically, statute requires individuals who are engaged in propaganda in the interest of foreign principals or governments to register with the Department of Justice (DOJ) and provide information regarding their activities, contract terms and clients.⁷⁰ Based on the report of the House Judiciary Committee in 1937, the main idea was to combat harmful propaganda by intense public disclosure of information.⁷¹

Subsequently, the statute was amended several times, its scope and application gradually changed. For instance, based on one of the major amendments in 1966, the focus of the Act changed and transitioned from political propagandists to agents who promoted economic interests of foreign principals. Based on the referred amendment, exemptions were expanded so as to protect the legitimate commercial activities, provisions for disclosure were strengthened, some definitions in the statute were changed, Department of Justice was required to issue regulations based on the act and etc.⁷² It can be stated that, in the course of time the statute provisions were quite altered. However, it should be noted that the amendments have not prohibited any activities. Specifically, the statute provisions do not directly prohibit or limit representation of foreign interests or foreign propaganda.⁷³ On the

⁶⁷ H.R. REP. NO. 74-153, 1935, cited in Robinson. N., 2020, p. 1093, <https://scholarship.law.duke.edu/dlj/vol69/iss5/2/>;

⁶⁸ H.R. Rep. No. 153 at 1, 74th Cong., 1st Sess., 1935, cited in Brown, C., 2017, p. 2, <https://sgp.fas.org/crs/misc/R45037.pdf>;

⁶⁹ FARA. What is FARA? Retrieved December 29, 2024, from <https://www.fara.us>;

⁷⁰ Congressional Research Service, 5 January 2024; <https://crsreports.congress.gov/product/pdf/IF/IF10499>

⁷¹ H.R. REP. NO. 75-1381, at 2, 1937, cited in Robinson. N., 2020, p. 1094, <https://scholarship.law.duke.edu/dlj/vol69/iss5/2/>;

⁷² Congressional Research Service, 5 January 2024, <https://crsreports.congress.gov/product/pdf/IF/IF10499>;

⁷³ H.R. Rep. No. 1381 at 2, 75th Cong., 1st Sess., 1937, *Meese v. Keene*, 481 U.S. 465, 478, 1987, United States v. Auhagen, 39 F. Supp. 590, 591, 1941, cited in Brown, C., 2017, p. 1; <https://sgp.fas.org/crs/misc/R45037.pdf>;

contrary, FARA tackles the issues of foreign influence by disclosing information regarding the activities and identities of specific individuals who are acting on behalf of foreign interests to the government and the American people.⁷⁴

According to the FARA provisions, the main purposes and policy of the statute include: protection of internal security, the national defense and foreign relations of the country. In order to achieve these aims the act highlights the requirement of “public disclosure” of foreign agents. Specifically, based on the provision, registration of an agent addresses the aim to provide information to the government and citizens of the U.S. regarding the foreign agents so as to ensure that they will have the chance to assess their actions or statements considering their connections and activities.⁷⁵

It can be stated that FARA does not interfere with the expression of foreign interests and therefore, does not prohibit to conduct any related activities. Instead, the statute focus disclosure and tries to regulate foreign interference and impact by publicly displaying the information about the agent and foreign source. “The Foreign Agents Registration Act provides the public with an opportunity to be informed of the identity of persons engaging in political activities on behalf of foreign governments, foreign political parties, and other foreign principals, so that their activities can be evaluated in light of their associations”.⁷⁶

Based on the statute foreign agent is defined as “any person who acts as an agent, representative, employee, or servant” or “acts in any other capacity at the order, request or under the direction or control of a foreign principal”.⁷⁷

Under the act the definition of an agent also includes persons that are directly or indirectly financed, supervised, controlled, directed or subsidized by the foreign principle in whole or in major part and who directly or via other person within the U.S. takes part in political activities for or on behalf of foreign principal, acts as a public relations counsel, political consultant, information-service employee or publicity agent in support of foreign principals. Mentioned activities also include representing the interests of foreign principal to agency or any officials of the government in the United States, also collecting, soliciting, dispensing,

⁷⁴ Auhagen, 39 F. Supp. at 591, cited in Brown, C., 2017, p.2; <https://sgp.fas.org/crs/misc/R45037.pdf>;

⁷⁵ Foreign Agents Registration Act of 1938, As amended through P.L. 110-81, Enacted September 14, 2007, Policy and Purpose, <https://www.govinfo.gov/content/pkg/COMPS-1448/pdf/COMPS-1448.pdf>;

⁷⁶ U.S. Department of Justice, Report of the Attorney General to the Congress on the Administration of the Foreign Agents Registration Act, June 2012, cited in Congressional Research Service, 5 June 2024, <https://crsreports.congress.gov/product/pdf/IF/IF10499>;

⁷⁷ Foreign Agents Act of 1938, Sec.1, 22 U.S.C. § 611 (c)(1), <https://www.govinfo.gov/content/pkg/COMPS-1448/pdf/COMPS-1448.pdf>;

disbursing loans, money, contributions or other things of value in the interest of foreign principal.⁷⁸

It should be noted that the definition of the term “person”, for the purpose of the statute, includes individual, organization, corporation, partnership, association or other combinations of individuals.⁷⁹

Based on the mentioned provisions, it can be stated that considering a person or an entity as an agent is dependent on two main factors: if the person conducts any of the activities included by the statute and if they are carried out in the interest of a foreign principal. Since acting for a foreign principle is an essential factor it should be additionally clarified that under the statute, the concept of foreign principles includes the governments of foreign countries, foreign political parties, a person outside of the USA unless, they are citizens of the U.S. or are located in the latter or they are not individuals and are organized or established under the United States law and their place of business is in USA. Accordingly, if the organization, corporation or partnership is organized under the law of the foreign country and has its principal place of business abroad can be considered as a foreign principal.⁸⁰

Based on the mentioned provisions, it can be concluded that in order to qualify the acts of the persons as an activity of a foreign agent under the FARA, they should be conducted for or in the interests of foreign principals.

The statute includes some exemptions which are essential tools to safeguard the freedom of conducting political activities or to express opinions without interference. More specifically, certain types of individuals and entities are not qualified as foreign agents under the FARA.

For instance, media organizations are exempted from the definition of an agent of a foreign principal. In particular, according to the statute, “any news or press service or association organized under the law of the United States” or other states which are subject to jurisdiction of the U.S. or publications which are issued for legitimate news or journalistic activities are exempted from FARA requirements. In order to meet the criteria for exemptions, the ownership share of the specific news outlet of U.S. citizens should be at least 80% and its directors or officers should be the citizens of the USA. Additionally, it should be noted that news

⁷⁸ Foreign Agents Act of 1938, Sec.1, 22 U.S.C. § 611 (c)(1), <https://www.govinfo.gov/content/pkg/COMPS-1448/pdf/COMPS-1448.pdf>;

⁷⁹ Foreign Agents Act of 1938, Sec.1, 22 U.S.C. § 611 (a), <https://www.govinfo.gov/content/pkg/COMPS-1448/pdf/COMPS-1448.pdf>;

⁸⁰ FARA, Sec.1, 22 U.S.C. §611 (b), cited in Brown. C., (2017):6, <https://sgp.fas.org/crs/misc/R45037.pdf>;

organization or publication should not be financed, controlled, directed or owned by foreign principals, also their policies should now be determined by external entities.⁸¹

The statute includes other exemptions. Officials of foreign governments, diplomatic and consular officers or their staff members are exempted from FARA requirements if they act within the limits of their official positions. If the foreign government is recognized by the USA, then officials of government can be excluded from FARA responsibilities.⁸² Diplomatic and consular officers of foreign governments should be “duly accredited” and recognized by the U.S. State department as an officer in order to be part of exemptions. Besides, mentioned individuals or members of diplomatic and consular officers’ staff should not be publicity agents, information-service employees or public-relations counsel in order to be excluded from FARA requirements.⁸³

Exemptions are also allowed for agents that take part in non-political and private activities, like commerce, charitable work, religious, scientific or scholastic engagements. Therefore, individuals or entities who engage in activities which do not majorly serve for foreign interests, mainly aim to achieve legitimate commercial interests of foreign principals, charitable purposes and etc.⁸⁴ Many argue that the concept and the scope of mentioned exemptions is quite unclear. For instance, many consider that exemptions regarding commercial interests need more clarification.⁸⁵

Apart from this, if there is a common interest between the USA and other country, some exemptions can be made from FARA. In particular, an agent that represents the country which is essential for the defense interests of the USA, is exempted from registration requirement till there is a mutual defense interests between countries.

Exemptions also apply to a person who has the right to practice the law and during the legal representation of foreign principal is excluded from registration requirement. However, it should be noted that the statute prohibits to influence agency or other officials other than in the course of court proceedings.⁸⁶

⁸¹ FARA, Sec.1, 22 U.S.C. §611 (d), cited in Brown. C., 2017. P. 8;

⁸² FARA, Sec.3, 22 U.S.C. § 613, (b), cited in Brown. C., 2017, p. 9;;

⁸³ FARA, Sec.3, 22 U.S.C. § 613, (a), (c) cited in Brown. C., 2017, p. 9;

⁸⁴ FARA, Sec.3, 22 U.S.C. § 613, (d) cited in Brown. C., 2017, p. 9

⁸⁵ Brown. C., 2017, p. 9

⁸⁶ FARA, Sec.3, 22 U.S.C. § 613, (g) cited in Brown. C., 2017, p. 10

Certain foreign principals register based on the Lobbying Disclosure Act of 1995 (LDA). One of the essential criteria to be qualified for the exemption is that agents of foreign principals should not represent foreign governments and political parties within the foreign principals.⁸⁷

FARA provisions establish three major requirements for agents of foreign principals. Specifically, registration, disclosure and recordkeeping requirements.

As it was already mentioned, registration with the U.S. Department of Justice (DOJ). The person is obligated to register with DOJ within ten days after becoming an agent. Registration form should include information like the agreements between the agent and principal, income of the agent, amount of expenditures. Foreign agents also need to provide updated information every six months.⁸⁸

Based on the disclosure requirement, agent who supplies informational materials on behalf of foreign principals, should make copies of those materials and provide it to the DOJ within 48 hours of starting distribution process.⁸⁹

Agents should also keep records of their activities and provide it to the government of USA. Agents should maintain records for three years after terminating representation of foreign principal as those records must be accessible for the government inspection.⁹⁰

Based on the mentioned above, it can be briefly concluded that all the requirements established by the statute seeks the public disclosure of the activities and identities of agents. As it was previously mentioned, FARA does not prohibit directly the expression of opinion or interests on behalf of foreign principals, instead it focuses on disclosure of information and tries to tackle the problem of propaganda by intense public attention. Therefore, it can be stated that based on the provisions of the Act the government does not interfere with the freedom of expression and tries to combat propaganda by disclosing facts without any restrictions on agents.

The main purpose of the FARA is not to prohibit or restrict the rights to conduct foreign influence activities. On the contrary, it seeks to disclose the author and the source of the foreign speech and opinions in the country and to provide opportunity for the people to

⁸⁷ FARA, Sec.3, 22 U.S.C. § 613, (h) cited in Brown. C., 2017, p. 10

⁸⁸ FARA, Sec.2, 22 U.S.C. § 612, (b) cited in Brown. C., 2017, p. 7

⁸⁹ 22 U.S.C. § 614(a), cited in Brown. C., 2017, p. 8

⁹⁰ Sec.5, 22 U.S.C. §615, Cited in Brown. C., 2017. P. 8

evaluate foreign influence and information by considering the identity of an agent and its foreign principal.

It should be further discussed that in order to ensure effective enforcement of the statute, the latter also includes the rights to impose fines or to imprison persons who failed the requirements of the Act and did not register, or provided false information or omitted some or acted contrary to the established requirements. Specifically, such violations can cause the fine up to 10,000 Dollars and imprisonment for no more than five years, considering the violation.

⁹¹

FARA is subject of critics, some academics even argue that the certain definitions of the statute regarding the foreign agent or principals is quite broad and uncertain which can be interpreted outside the purpose and scope of the statute. However, it should be noted that considering the exemptions it is quite clear that statute maintains balance and does not breach the fundamental freedoms of persons. It does not restrict or prohibit any activities rather it requires transparency and disclosure of agents and their activities.

LAW OF GEORGIA ON TRANSPARENCY OF FOREIGN INFLUENCE

On 1 August 2024, the Law of Georgia on Transparency of Foreign Influence entered into force. Georgian government tried to enact this law in 2023 as well. However, because of the mass protest of Georgian people, government withdrew the law. From the very beginning the law was seen as a threat for democracy and freedom of opinion and was regarded as a “Russian law”.

Law on foreign agents also became the subject of large-scale protests in 2024, yet this time the government still enacted the law.

According to the Article 1 of the law, the main purpose of it is to “ensure the transparency of foreign influence”.⁹² As for the scope of the law, it seeks to regulate the registration of entities as organizations which follow the interests of foreign power and other matters in relation to the transparency of activities conducted by such organizations.

⁹¹ FARA, Sec. 8, 22 U.S.C. 618, Cited in Brown, C., 2017, p. 11;

⁹² Law of Georgia on Transparency of Foreign Influence, Article 1(1), <https://matsne.gov.ge/en/document/view/6171895?publication=0>;

As the law states, it does not restrict the activities of organizations which pursue the interests of foreign powers.⁹³

Under the provisions of the law, the definition of an organization pursuing the interests of foreign power include non-commercial legal person which is not established by the administrative entity, and is not blood establishment or National Sports Federation of Georgia, and which receives more than 20% of its income from foreign sources during a calendar year.⁹⁴

Mentioned definition of organizations also include broadcasters, legal person which jointly or alone own print media or the legal persons which jointly or alone owns or uses domain or web hosting intended for digital media which shares mass information in the official language of Georgia. Those legal persons are also required to register if more than 20% of their total income during a calendar year is originated from foreign sources.⁹⁵

As it can be seen from this law, the definition of organizations which are required to register is already quite broad and addresses every type of media sources. Besides, it can be said that it establishes relatively low income threshold for organizations to be subject of registration requirements under the law.

The law also broadly defines the term “income” for its purposes, which include not only an amount of money but other “tangible goods of tangible value (any movable or immovable thing)” and under the law their market prices are taken into account for the registration requirements.⁹⁶

The source of income is determined to be a foreign power in cases when the entity received it directly or indirectly from a foreign source, also in case when the entity received income from other legal person which directly or indirectly received it from foreign source. Even in cases when the source of income is not identified, under the law provisions, it is considered that the entity is financed by foreign power.⁹⁷

According to the law, the term foreign power includes entities which are the part of foreign government systems, legal persons which are not established based on the Georgian legislation, natural person who is not a citizen of Georgia and organizational entities like

⁹³ Law of Georgia on Transparency of Foreign Influence, Article 1 (2);

⁹⁴ Law of Georgia on Transparency of Foreign Influence, Article 2, (1), (a);

⁹⁵ Law of Georgia on Transparency of Foreign Influence, Article 2, (1), (a);

⁹⁶ Law of Georgia on Transparency of Foreign Influence, Article 2 (2);

⁹⁷ Law of Georgia on Transparency of Foreign Influence, Article 2 (4);

associations, a union, corporation and etc. that are established based on the legislation of a foreign state or international law.⁹⁸

The entity which meets the criteria under the law is obligated to provide information regarding the source, amount and purpose of the money or other tangible goods of tangible values it received or spent during the previous calendar year.⁹⁹ Entities should register with the National Agency of Public Registry which operates under the governance of the Ministry of Justice of Georgia.¹⁰⁰

It should be noted that the law grants essential rights to “a person authorized by the Ministry of Justice of Georgia” which are considered as a threat by many legal experts in Georgia.

In particular, entities which are subject to registration requirements should provide statements and financial declaration that include information about their identification data, location, source of income, its amount and etc.¹⁰¹ The person authorized by the Ministry of Justice of Georgia, is allowed to examine statement and financial declaration, all the provided information and investigate details. For the mentioned aim, the law grants the authorized person the right to receive all the information which is needed in accordance to the law. Specifically, authorized person can obtain personal data, information that contains a secret, except a state secret, and also special categories of data provided by the Law of Georgia on Personal Data Protection.¹⁰² The law also establishes related obligation for “all persons, bodies, organizations, and institutions”, based on which they are required to provide all the information that are requested by a person authorized by the Ministry of Justice of Georgia.¹⁰³

Mentioned provisions are viewed as threat to some fundamental human rights and many consider that based on those provisions the government will also have the opportunity to access individuals and impose some unfair requirements on them.

In particular, as it was mentioned above, a person authorized by the Ministry of Justice can require any information from persons including special categories of data. Under the Law of Georgia Personal Data Protection, special categories of data include information regarding a person’s ethnical or racial origins, state of health, criminal history, political views, sexual life,

⁹⁸ *Ibid*, Article 4, (3);

⁹⁹ Law of Georgia on Transparency of Foreign Influence, Article 4 (4);

¹⁰⁰ Law of Georgia on Transparency of Foreign Influence, Article 4 (1);

¹⁰¹ *Ibid*, Article 4, (3);

¹⁰² *Ibid*, Article 4, (4);

¹⁰³ *Ibid*, Article 4, (4);

membership of organizations, religious or philosophical beliefs, genetic data and etc.¹⁰⁴ Therefore, authorized person is allowed to access some private and sensitive matters or information which can result in the breach of essential fundamental rights like right to privacy.

Besides, even though at first glance, the law does not affect individuals and imposes registration requirements only on entities. However, since all persons are obligated to provide information based on the authorized person's request it can be stated that Ministry of Justice can also impose some requirements on natural person as well and demand their personal details with the argument that it is significant and necessary to ensure foreign influence in the country.

Such requirements for providing information are also established in relation to monitoring rights of authorized person. Specifically, the latter has the right to conduct monitoring in order to examine the compliance of activities and provided information of organizations pursuing the interests of foreign power with the law in question and to identify organizations pursuing the interests of foreign power. For mentioned purposes, authorized person is also granted the right to request information from all persons, organizations and institutions.¹⁰⁵ Failure to provide such information results in a fine of 5000 GEL.¹⁰⁶

It can be stated that the provision which regulates referred monitoring process, has some similarity with the provisions of Russian law on foreign agents and should also be deemed as a threat to democracy and fundamental rights in Georgia. In particular, monitoring can be initiated not only based on the decision of the authorized person but also “a written application” provided to the Ministry of Justice which contains details regarding the entity which meets the criteria established by the law.¹⁰⁷

Additionally, if it has been established that the entity is subject to the law requirements but it still evaded the registration, the agency should register it as an organization which pursues the interests of foreign power based on the application of the person authorized by the Ministry of Justice.¹⁰⁸

¹⁰⁴ Law of Georgia on Personal Data Protections, Article 2 (b); <https://matsne.gov.ge/en/document/view/1561437?publication=23>;

¹⁰⁵ *Ibid*, Article 8 (1), (3);

¹⁰⁶ *Ibid*, Article 9 (4);

¹⁰⁷ *Ibid*, Article 8 (5);

¹⁰⁸ *Ibid*, Article 7 (1);

Based on these provisions, it is quite obvious that the authorities in Georgia are granted broad rights and can severely interfere with the freedom of entities and persons and breach their fundamental rights.

The law in question establishes the possibility to annul the registration in case the entity provides necessary information and proves that it no longer meets the criteria of an organizations which pursues interests of foreign powers. In this case the authorized person has the right to examine and further investigate all the details, including the request for above-mentioned personal information.¹⁰⁹

As for the liability purposes the entity can be fined based on the law provisions. However, entities still need to fulfill requirements under the law since liability imposition does not exempt them from obligations.¹¹⁰

Based on the provisions, it can be concluded that the law under the discussion can be used arbitrarily since it includes some unclear definitions and provisions. It already has some similarities with the Russian foreign agent law and many deem that its scope will further extend in the future and may even include stricter requirements.

The Venice Commission also issues an urgent opinion regarding the law. It should be noted that the Georgian Parliament did not wait for the recommendation and opinion of the Commission and passed the law in the context of international critics and mass protests from civilians.

Considering the facts that the law on transparency of foreign influence was adopted despite the huge opposition from the citizens, the Venice Commission stated in its opinion that such process of adopting a law does not meet the criteria of European democratic law-making. Specifically, the Commission highlighted that the law was adopted “in a procedure which left no space for genuine discussion and meaningful consultation, in open disregard for the concerns of large parts of the Georgian people”.¹¹¹

¹⁰⁹ *Ibid*, Article 7 (1);

¹¹⁰ *Ibid*, Article 9 (6);

¹¹¹ EUROPEAN COMMISSION FOR DEMOCRACY THROUGH LAW (VENICE COMMISSION), 21 May 2024, Para. 94-95, p. 23, [https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-PI\(2024\)013-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-PI(2024)013-e);

The Commission also concluded that the provisions of the law “do not meet the requirements of legality, legitimacy, necessity in a democratic society and proportionality”, also it is incompatible with some provisions of ECHR and the principle of non-discrimination.¹¹²

The Commission also stated that the law has the “objective effect of risking, the stigmatizing, silencing and eventually elimination of associations and media which receive even a low part of their funds from abroad”.¹¹³ According to the opinion, such an approach and the threat of eliminating criticizing entities will eventually result in the removal of pluralism, democracy and open public detail.¹¹⁴

The Venice Commission recommended the Georgian government to cancel this law in its current form as it is against European standards and can cause negative effects for the freedom of expression, right to privacy, right to participate in public affairs and the prohibition of discrimination.¹¹⁵

Failed Securitization

This chapter provides the responses of domestic and international audiences regarding the law. One key example of the law is a failed securitization case, where the majority of the Georgian people did not accept the law as an existential threat. The public itself served a **protest** against the law. People supported the arguments of opposition parties, presidents, and international partners, who referred to the law as the “Russian law” and as a threat for Georgia’s European future. During the protest, people had the slogan “Yes to Europe, No to Russian Law” and called on the government to withdraw the law.

For two months, people protested in the streets of Tbilisi, the capital, and other cities. It is also important to note that Georgians abroad protested in front of Georgian embassies in various European countries. In 2023 and again in 2024, young people—“Generation Z” (born between 1997 and 2012)—played a significant role in the protests.

¹¹² EUROPEAN COMMISSION FOR DEMOCRACY THROUGH LAW (VENICE COMMISSION), 21 May 2024, Para. 95 p.23;

¹¹³ *Ibid*, Para. 98, P. 23;

¹¹⁴ *Ibid*, Para. 98, P. 23;

¹¹⁵ *Ibid*, Para. 99-100, p. 24

Youth groups gathered at Heroes Square in Tbilisi, where the eternal flame burns at the monument to fallen soldiers. They swore an oath to defend the nation, emphasizing the pillars of homeland, language, and unity. The oath included the declaration: "Our language, our fatherland, our unity. We swear, we swear, we swear. Long live independent Georgia."¹¹⁶ Prime Minister Irakli Kobakhidze criticized the changes in the youth's oath, suggesting that replacing "faith" with "unity" altered the traditional concept of national identity. In response, youth changed their slogans to include "Fatherland," language, unity, and faith.¹¹⁷

Moreover, young people organized through the social media protest they created Facebook groups like "Daitove," (unites more than 250 thousand people) which helped people from different regions to attend the protests by providing transport and accommodation. They also collected money for people who were fined or charged due to the participation in the protests. Prime Minister Irakli Kobakhidze and other pro-government figures have tried to call them a "violent group" and portrayed them as connected to the "radical opposition."¹¹⁸

The protests were not only led by Generation Z; people of all ages participated. It is important to note that these demonstrations were organized by civil society groups and ordinary citizens, including members of cultural organizations, without political intervention or speeches from political opposition figures on the main stage.

According to both Georgian and international NGOs, including prominent organizations like Human Rights Watch, law enforcement often resorted to force during large-scale protests, particularly those held in front of the parliament building in Tbilisi. During these demonstrations, police frequently used tear gas, water cannons, and pepper spray against largely peaceful protesters. Notably, on the night of April 30, just before the bill's second reading, and again on May 1, there were reliable reports of officers employing rubber bullets to disperse the crowds.¹¹⁹

Police physically attacked several individuals at the protest, including young people, women, journalists, and opposition politicians. Cases were documented where multiple officers

¹¹⁶Civil Georgia, "Youth Rally, Swear a Solemn Oath to Defend the European Choice", (20.04.2024), <https://civil.ge/archives/600344>

¹¹⁷ Civil Georgia, "CPAC: PM Kobakhidze Defends Christianity, Identity from "So-Called Liberals"", (25.04.2024), <https://civil.ge/archives/601368>

¹¹⁸ David Pipia, Maradia Tsaava, "How Generation Z found itself at the forefront of Georgian protests: An insight from Tbilisi", Jam News, (07.06.2024), <https://jam-news.net/generation-z-and-georgian-protests/>

¹¹⁹ HRW – Human Rights Watch Georgia: 'Foreign Influence' Bill Threatens Rights <https://www.ecoi.net/de/dokument/2108955.html>

dragged protesters into police lines and assaulted them, punching, pulling their hair, and kicking them while they were on the ground. Notably, members of the Georgian Parliament (Aleksandre Elisashvili and Levan Khabeishvili), and journalists were among the victims of this treatment. The pursuit of demonstrators continued even in the subway. The representatives of the police forces continued the practice of illegal arrests. The observation of this demonstration also showed that the police force periodically detained the participants of the demonstration without any factual basis.¹²⁰

In addition to physical violence, ordinary citizens, politicians and media and civil society representatives received during harassing and abusive phone calls, where their family members have been threatened. The Georgian Young Lawyers Association, a watchdog, stated that given the nature of the calls and their targets, there is a suspicion that the data were processed illegally using databases from state authorities¹²¹.

Prime Minister Irakli Kobakhidze, mentioned that there was violence and insults directed at the police, but he highlighted that, overall, the police acted in a 'European way.' He highlighted that six police officers and five protesters were injured, presenting this as evidence that the situation was relatively controlled compared to similar demonstrations in other European countries.

The protest also received international support, as evidenced by the attendance of the foreign ministers of Nordic countries. This action by the Government of Georgia was evaluated as an example of the purpose of foreign agent law” against foreign intervention in Georgia’s domestic policy.”

“Georgian Charter”

Another significant example of domestic rejection of the "Foreign Influence Law" was the unification of opposition parties around the idea of the "Georgian Charter." Introduced by President Salome Zourabishvili on May 26, 2024, Georgia's Independence Day, the Charter was presented as a solution to counterbalance the political crisis and return the country to its

¹²⁰ საერთაშორისო გამჭვირვალობა საქართველო, “30 აპრილი - 1 მაისის აქციის დარბევის სამართლებრივი შეფასება“, (01.05.2024), https://transparency.ge/ge/post/30-aprili-1-maisis-akciis-darbevis-samartlebrivi-shepaseba/?custom_searched_keyword=დაკავება.

¹²¹ Civil Georgia, “GYLA Raises Alarm Over Surge In Abusive Phone Calls Amid Protests, Alleges Personal Data Breach”, (08.05.2024), <https://civil.ge/archives/604628>

European course. Two days later, on May 28, the Georgian Parliament overcame the President's veto on the law despite widespread protests and strong criticism from international partners. The President urged political parties to rally behind the Charter, emphasizing that it reflected the demands and expectations of Georgian society and addressed the European Union's 9-point recommendations necessary for Georgia's integration into Europe and strengthening its democracy.

The main commitments outlined in the "Georgian Charter" focus on significant reforms to restore Georgia's European course and democratic integrity. The priority is the abolition of laws deemed harmful to the country's European trajectory, including the controversial "Transparency of Foreign Influence" law, as well as changes to the election code and laws on wiretapping and offshore dealings. The Charter also pledges to resolve politically motivated cases stemming from the 2024 protests by issuing amnesty to the affected demonstrators. Another key commitment is to liberate the judiciary and restore public trust by ending political control over the system through integrity checks. It further emphasizes enhancing the independence of critical institutions such as: the Prosecutor's Office, State Security Service, Ministry of Internal Affairs, Special Investigation Service, Anti-Corruption Agency, National Bank, and other regulatory bodies.¹²²

Regarding the electoral system, the President stressed that signatories of the Charter are committed to implementing the outlined steps before the first spring session following the elections on October 26, 2024. Once these reforms are complete, snap parliamentary elections will be prepared and held fairly and transparently. The President of Georgia will also nominate the government responsible for executing this plan.

The Charter also allowed pro-European parties to collaborate, either under a unified platform or independently. President Zourabichvili emphasized that this initiative offers Georgia a chance to restore its EU accession process and open negotiations as quickly as possible. Most parliamentary and non-parliamentary opposition parties have signed the "Georgian Charter", signaling broad support for its goals and commitments.

¹²² Speech delivered by Salome Zourabichvili, President of Georgia. (2024, May 26), Retrieved from [\[https://president.ge/index.php?m=206&appeals_id=398&lng=eng\]](https://president.ge/index.php?m=206&appeals_id=398&lng=eng)

According to Irakli Kobakhidze “Georgian Charter” is a first step creating register of foreign agent working not to realize the interests of the Georgian people, but to realize other interests. They want revolution, and second front in Georgia¹²³.

Furthermore, Parliamentary majority leader Mamuka Mdinardze responded to the "Georgian Charter" on his official Facebook page. He called Zourabihvili's plan a "local war charter."

Before the 2024 elections, President Salome Zourabichvili proposed creating a larger electoral coalition by uniting “Strong Georgia” with the “Gakharia—For Georgia” party. However, despite the president’s efforts and several rounds of negotiations, the alliance did not materialize. Nevertheless, the presidential palace became the main venue for the opposition to convene for consultations and idea exchanges.

The Coalition for Change, a pro-European, center-right bloc led by Nika Gvaramia and Nika Melia, brought together parties like Elene Khoshtaria’s “Droa” and Zurab Japaridze’s “Girchi – More Freedom.” Their symbolic figure was Nana Malashkhia, a civil servant who gained prominence during the 2023 pro-European protests. The coalition’s primary aim was EU integration.

Another major contender was the National Movement, Georgia’s most popular opposition party, founded by former president Mikheil Saakashvili. Rebranded as “Unity – National Movement,” the coalition included “Strategy Agmashenebeli” and “European Georgia.” Their campaign emphasized Georgia’s European future, with their key priorities distributed on leaflets resembling EU passports.

The Coalition “Strong Georgia,” a pro-European, center-right group led by Mamuka Khazaradze’s “Lelo,” also included parties like Ana Dolidze’s “For the People” and Aleko Elisashvili’s “Citizens.” Backed by former president Giorgi Margvelashvili, this coalition sought to consolidate moderate opposition forces.

It should be noted that despite the existing differences of opinion among the opposition parties, they unanimously agreed on and signed the main value—a European future. In each party's election pledge, membership in the European Union was the main issue, which was also relevant to the Dream's election campaign, which also focused on European integration

¹²³ IMEDI News, “ირაკლი კობახიძე: სალომე ზურაბიშვილმა დაიწყო უცხოელი აგენტების რეესტრის წარმოება“, (28.05.2024), <https://imedinews.ge/ge/politika/339806/irakli-kobakhidze-salome-zurabishvilma-daitsko-utskhoeli-agentebis-reestris-tsarmoeba-da-ets-qartuli-qartia-aris-stsored-utskhoeli-agentebis-reestris-sheqmnis-pirveli-mtsdeloba-madloba-mas-amisatvis>

as a priority. During the campaign, the Georgian Dream actively tried to instill fear of war among the population. In other words, Georgian Dream sought to convince voters that if they chose the opposition, Georgia would be drawn into conflict. This theme was also reflected in Georgian Dream's campaign banners, which juxtaposed war-torn Ukraine with peaceful Georgia. Another central and traditional promise of Georgian Dream was the dissolution of its main political opponent, the National Movement, and its declaration that it unconstitutional.¹²⁴

The majority of organizations, despite the adoption of the law, do not want to register; most of them hope for its cancellation after the elections, and some organizations will consider registering abroad among the survival scenarios, the online publication "Tabula" wrote about this publicly for the first time. In case of registration abroad, the media organization will be subject to the legislation of the country where it is registered and, accordingly, will pay taxes to the budget of the foreign country.

The Ministry of Justice of Georgia has updated the register websites—the "Register of Foreign Interest Agents" (the Agents Register). In the register, finding those non-governmental and media organizations by identification number will be possible.¹²⁵ The registration deadline for the previous year was 2 October. Based on the latest information, 385 organizations are registered on the website¹²⁶. "Registration avoidance" envisages a fine of 25 thousand GEL (9000 USD).

In parallel, the President of Georgia filed a lawsuit with the Constitutional Court of Georgia, arguing that the recently adopted law is unconstitutional and violates Article 78 of the Constitution of Georgia. The lawsuit is supported by 121 civil society and media organizations, opposition MPs, and two journalists, with the Court consolidating these cases into a single proceeding. The lawsuits allege that the law violates key constitutional provisions, including:

- **Article 78:** Integration into European and Euro-Atlantic structures
- **Article 15:** The right to personal and family privacy, personal space, and privacy of communication

¹²⁴ Jam News, "Who's who in the Georgian elections: A brief overview of the key players", (20.10.2024), <https://jam-news.net/whos-who-in-the-georgian-elections-a-brief-overview-of-the-key-players/>

¹²⁵

¹²⁶ უცხოურ ძალის ინტერესების გამგარებელ ორგანიზაციათა რეესტრი, <https://fitreg.napr.gov.ge/fitr/fitr-pub/>

- **Article 17:** The right to freedom of association¹²⁷

The Constitutional Court denied the plaintiffs' motion to suspend the enforcement of the disputed provisions until a final decision is made. The Court announced that it would consider the case within the legally mandated nine-month period. However, it noted that this timeline does not guarantee that a decision will be announced within that timeframe, as judges are not subject to a specific deadline for delivering their verdict.¹²⁸

Overall, the President's intention behind the Charter was to counterbalance the "Foreign Influence Law" and to unite and fully mobilize the opposition and society for the elections, aiming to steer Georgia back onto its European path.

International Response

The role of the Georgian President, Salome Zourabichvili, extended beyond domestic mobilization around the "Foreign Influence Law" and proved significant in engaging with international partners. During the protests in May, foreign ministers from Nordic countries, Lithuania, Latvia, Estonia, and Iceland visited Georgia. President Zourabichvili expressed her gratitude to Lithuanian President Gitanas Nausėda for initiating this diplomatic visit, highlighting its significance as a critical signal of support for Georgia's European aspirations.

In a joint statement, these international leaders expressed their support for Georgia's Euro-Atlantic ambitions and issued warnings about the potential consequences of the proposed law.

Lithuanian Foreign Minister Gabrielius Landsbergis underscored the law's detrimental impact on Georgia's EU and NATO aspirations:

"It is our duty to tell you everything as it is. Let me be very clear. Adoption of the "Foreign Agents" law, as well as repression against Georgian civil society, will stop Georgia's further progress on the path to the EU and NATO. If this happens, the entire responsibility rests with the Georgian government. However, it is not too late." Our true interest is to help Georgia in its European journey to its final destination. Georgia belongs to Europe. As the late Prime

¹²⁷ Parliament of the Republic of Georgia, Constitution of Georgia, <https://matsne.gov.ge/en/document/view/30346?publication=36>

¹²⁸ <https://www.radiotavisupleba.ge/a/33152165.html>

*Minister of Georgia, Zurab Zhvania, said in a speech in Strasbourg when Georgia joined the European Council: - "I am Georgian and therefore, I am European" - and yes, you are!*¹²⁹

Estonian Foreign Minister Margus Tsahkna emphasized the symbolic nature of the law and its broader implications:

*“ This law violates human rights, civil liberties and everything that the European Union protects, this law is a symbol - between Russia and the European Union. A symbol of choice ”*¹³⁰

Icelandic Foreign Minister Thordis Kolbrun Reykfjörður Gylfádóttir highlighted the solidarity of smaller nations with shared values:

“Our visit is out of respect for Georgia, its leadership and people. We hope that we will be able to consider Georgia as part of the world that supports the freedoms and rights that Russia is attacking, and this is actually reflected in more than 85% of the Georgian population, which supports the transatlantic route. ”

Latvian Foreign Minister Baiba Braže reinforced the importance of aligning with European standards:

*“We are very clear about the concerns we have raised. Joining the European Union is not just a political goal. This requires very practical steps on the part of the country, in order to align its legal, justice, law enforcement system and many other European standards. it is not an involvement in internal politics. these are European standards that we all have to meet to join the European Union. After Georgia's European and Euro-Atlantic goals were written into the constitution, because more than 80 percent of Georgians support EU membership, we, as the Baltic countries and as the Scandinavian-Baltic group, have put a huge amount of political, financial and other capital at the table of the European Union and NATO in support of Georgia's goal ”*¹³¹

¹²⁹ რადიო თავისუფლება, “საკონსტიტუციო სასამართლომ ე.წ. აგენტების კანონის მოქმედება არ შეაჩერა - სარჩელები ნაწილობრივ განსახილველად მიიღო“, (09.10.2024), <https://www.radiotavisupleba.ge/a/33152165.html>

¹³⁰ სალომე ზურაბიშვილი/Salome Zourabichvili, Facebook video (15.05.2024), https://fb.watch/w_XxfHCnGm/

¹³¹ სალომე ზურაბიშვილი/Salome Zourabichvili, Facebook video, (15.05.2024), https://fb.watch/w_XxfHCnGm/

Their visit was beyond statements. They took to the streets with the protesters, marching together along Rustaveli Avenue towards the Parliament building. This showed strong moral support for the demonstrations and was a visible act of solidarity.

Addressing the crowd, Minister Gabrielius Landsbergis asked in Georgian, *"Where are we going?"* The protesters responded, *"In Europe,"* sparking chants of "Thank you!" among the crowd.

Estonian Foreign Minister Margus Tsahkna echoed the sentiment:

"You, as a nation, have chosen your path to Europe. We, all of us, will do everything together to ensure that this path continues."

Iceland's Foreign Minister added:

*"Today, I am here. You are not alone, and you have our respect."*¹³²

Regarding the "Foreign Influence Law," President of France Emmanuel Macron published a joint statement with Germany and France expressing concern about the situation in Georgia. Both countries have strongly supported Georgia's European journey, including the European Council's decision to grant it candidate status in December 2023. The law is against shared European values and the aspirations of the Georgian people.¹³³

Lithuanian Foreign Minister Gabrielius Landsbergis wrote on the X platform on 28 May that this is a sad day for Georgia and the rest of Europe. The adoption of this law put Georgia's accession to the EU on hold, with no benefit for almost anybody.¹³⁴ Moreover, On 29 May, Lithuania's Ministry of Foreign Affairs summoned the Georgian Ambassador after the Georgian Parliament voted to override President Salome Zurbishvili's veto of the so-called 'foreign influence' law. The statement emphasizes that the Ministry of Foreign Affairs expressed concern over the actions of Georgia's ruling party, which aimed to restrict civil society activities. This action is against the aspirations of EU and NATO integration enshrined in the country's constitution.¹³⁵

¹³² რადიო თავისუფლება, "სად მივლივართ? - ევროპაში" - ესტონეთის, ლიეტუვისა და ისლანდიის საგარეო საქმეთა მინისტრები აქციას შეუერთდნენ", (15.05.2024), <https://www.radiotavisupleba.ge/a/32948941.html>

¹³³ Emmanuel Macron, Facebook post, (19.05.2024), https://www.facebook.com/story.php?story_fbid=1015462769935639&id=100044157757824&rdid=tGLO4lN4xqchERky

¹³⁴ Gabrielius Landsbergis (@Glandsbergis) X post, <https://x.com/Glandsbergis/status/1795471885699858819>

¹³⁵ Gabrielius Landsbergis (@Glandsbergis) X post, <https://x.com/Glandsbergis/status/1795471885699858819>

Andrius Kubilius, former Prime Minister of Lithuania, MEP, and Co-President of the Euronest Parliamentary Assembly (2019–2024), published an open letter to the Georgian people on July 11, 2024. In the letter, he emphasized that “Georgian Charter” are the only political institutions and political instruments able to help the Georgian people achieve existential goals. He also noted that the opposition’s decision to unite around this idea demonstrates their commitment to bring Georgia to the path of European integration.¹³⁶

Salome Zourabichvili, during her meetings with Georgia's partner countries, highlighted the importance of the "Georgian Charter." On June 15, during the Ukrainian Peace Summit, President Salome Zourabichvili, met with Charles Michel and Josep Borrell, where they discussed the „Georgian Charter” as a roadmap for Georgia’s alignment with EU recommendations.

According to the President's press releases, the Charter was also discussed in meetings with the parliamentary delegation from the Netherlands, the U.S. Deputy Secretary of State, and German President Frank-Walter Steinmeier. Steinmeier welcomed the initiative and expressed hope that pro-European forces will prevail in Georgia. Steinmeier also voiced his full support for the Georgian people and their pursuit of a European future.

The United States' response regarding the adaptation of the law was not only a statement but also action. Antony J. Blinken: Secretary of State announced that GD passed “foreign influence” law which stifles the exercise of freedoms of association and expression, stigmatizes organizations that serve the citizens of Georgia, and makes it harder for independent media to provide quality information. Georgians opposing the law have faced intimidation and violence aimed at silencing peaceful dissent. In response to these actions, the U.S. Department of State has introduced a visa restriction policy targeting individuals and their families who undermine democracy in Georgia—those involved in suppressing civil society or peaceful assembly through violence or intimidation.¹³⁷

U.S. Department of Defense announced on July 5, 2024, that The United States will postpone the interaction of exercise NOBLE Partner in Georgia, scheduled for July 24-August 6, 2024. This decision comes in response to the recent false accusations from the

¹³⁶ Ministry of Foreign Affairs of Lithuania. (2024, May 29). The Ministry of Foreign Affairs expresses concerns about the situation in Georgia.

¹³⁷ Andrius Kubilius. On the significance of pro-European unity in Georgia: Open letter to the Georgian people. Sakartvelo, Eastern Partnership. (2024, July 11), <https://elpnariai.lt/en/andrius-kubilius-on-the-significance-of-pro-european-unity-in-georgia/> access 28.11.2024

Georgian government towards the United States and other Western entities that pressured Georgia to open a second front against Russia to alleviate pressure on Ukraine and were involved in two attempted coups against the ruling party. Considering the abovementioned, the United States Government has decided it is not the right time to conduct a large-scale military exercise in Georgia. The United States remains committed to supporting the Georgian Defense Forces in safeguarding Georgia's sovereignty and territorial integrity.

On July 31, in a press statement, Secretary of State Antony J. Blinken announced that, following a comprehensive review of bilateral cooperation between the United States and Georgia initiated on May 23 due to anti-democratic actions by the Georgian government, the United States is pausing over \$95 million in assistance directly benefiting the Georgian government. He emphasized that The Georgian government's anti-democratic actions and false statements are incompatible with membership norms in the EU and NATO. However, the United States will continue assisting programs and activities that benefit the people of Georgia by strengthening democracy, the rule of law, independent media, and economic development.¹³⁸

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On September 16, 2024, the United States announced sanctions and visa restrictions targeting Georgian officials and individuals involved in undermining democracy and human rights. Sanctions were imposed on Ministry of Internal Affairs officials Zviad Kharazishvili and Mileri Lagazauri for their roles in abuses during protests against the foreign influence law. Extremist group leaders Konstantine Morgoshia and Zurab Makharadze were also sanctioned

¹³⁸ U.S. Department of Defense. Postponement of Exercise Noble Partner Announcement, 2024.07.05 <https://www.defense.gov/News/Releases/Release/Article/3827839/postponement-of-exercise-noble-partner-announcement/> Access 20.10.2024

¹³⁹ Blinken, A. J. Announcement of a visa restriction policy for undermining democracy in Georgia and comprehensive review of all U.S.-Georgia cooperation <https://ge.usembassy.gov/us-pauses-aid-to-georgian-government-over-anti-democratic-actions/> Access 20.10.2024

for violent attacks on peaceful protesters. Additionally, visa restrictions were placed on over 60 individuals, including government officials, business leaders, and law enforcement, for restricting freedoms, promoting disinformation, and advancing undemocratic legislation. The U.S. reaffirmed its support for the Georgian people's rights to peaceful assembly, free speech, and protest.¹⁴⁰

The European Council expressed concern that the law on the transparency of foreign influence represents a backslide in the Commission's recommendations for candidate status. It called on Georgia's authorities to clarify their intentions by reversing the current course of action, which jeopardizes Georgia's EU path and could lead to a de facto halt in the accession process.¹⁴¹

The EU ambassador to Georgia, Pawel Herczynski, confirmed that the EU has frozen its support for Georgia from the European Peace Facility—amounting to EUR 30 million for 2024. He expressed sadness at seeing EU-Georgia relations at such a low point when they could have been at an all-time high.¹⁴²

CONCLUSION

This master's thesis aimed to identify the differing frames surrounding the "Transparency of Foreign Influence" law. Through framing analysis, different frames were found, and based on these frames, the perception of the law by both domestic and international audiences was explored.

In both 2023 and 2024, Georgian Dream (GD) and People's Power maintained dominant frames. In 2023, the most popular frame was the "false campaign," which asserted that the claim of similarity between the "Georgian law" and the "Russian law" was a lie. One of the

¹⁴⁰ Blinken, United States to pause assistance to the Government of Georgia [Press statement]. U.S. Embassy Tbilisi. (2024, July 31).

<https://ge.usembassy.gov/us-pauses-aid-to-georgian-government-over-anti-democratic-actions/> Access 20.10.2024

<https://ge.usembassy.gov/promoting-accountability-for-serious-human-rights-abuse-and-anti-democratic-actions-in-georgia/>

¹⁴¹ U.S. Embassy Tbilisi. (Promoting accountability for serious human rights abuse and anti-democratic actions in Georgia. U.S. Department of State. 2024, September 16

<https://ge.usembassy.gov/promoting-accountability-for-serious-human-rights-abuse-and-anti-democratic-actions-in-georgia/>

¹⁴² EU Delegation Georgia, X post, (09.07.2024), <https://x.com/EUinGeorgia/status/1810566433547362720>

key frames from GD was the law as a measure against "foreign intervention," which was often tied to the narrative of a "second front" and the "global war" conspiracy. This narrative suggested that the global war party aimed to drag Georgia into war. Additionally, the "sovereignty/national identity" frame was used, emphasizing the protection of Georgia's independence, with the Orthodox Church playing a central role in the national identity narrative. Meanwhile, the President's main frame in 2023 was that the law posed a threat to Georgia's European future.

The President characterized the parliamentary elections as a choice between the ruling party, Georgian Dream (GD)—which was seen as representing Russia—and the opposition parties, which represented Europe. She argued that opposition parties must unite around the "Georgian Charter" for the country's European future. On the other hand, the opposition framed the law as a tool for GD to suppress NGOs and "maintain power".

What concerns within the international community about the law's threat to the country's democracy and European future.

Based on the framing analysis, opposition parties, international partners, and the President's side most frequently compared the Georgian law to the "Russian law." At the same time, GD and People's Power emphasized its similarity to the "FARA" (Foreign Agents Registration Act). Notably, FARA focuses on public disclosure and does not prohibit or eliminate registered agents from engaging in social or political activities. In contrast, Russian legislation restricts registered foreign agents from participating in various activities, such as electoral commissions, electoral campaigns, and educational activities for minors. The Georgian foreign influence law, similar to the Russian law, would pose significant threats to freedom of expression, opinion, and democracy in the country.

The defended statement was correct. The Georgian government's attempt at securitizing the Law on Transparency of Foreign Influence was unsuccessful, as evidenced by the resistance from both domestic and international audiences in accepting the law as an existential threat.

Public Resistance: Widespread protests across Georgia demonstrated the failure to convince the majority of the public that the law was a legitimate security threat, with the Georgian people being the main audience.

International Opposition: statements from international representatives emphasized their support for Georgia's European future. Sanctions imposed by the EU and the USA rejected the law's framing as a national security concern.

Political Opposition Unity: Opposition parties rallied around the President's "Georgian Charter" for the parliamentary elections, framing the choice as one between Europe (the opposition) and Russia (Georgian Dream).

For future research, I recommend expanding the analysis to include both dominant and secondary frames to gain a more nuanced understanding of the narrative dynamics surrounding the law. Additionally, broadening the range of media sources to include alternative and less prominent outlets could provide a more comprehensive view of how the law was framed across diverse platforms.

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Summary

This thesis examines the differing frames surrounding Georgia's "on the transparency of foreign influence" law and how government, opposition president and International partners framed it. The law, introduced in 2023 and adopted in 2024, Government adopted its controversial draft legislation "on the transparency of foreign influence" into law. It compels civil society organizations receiving foreign funding more than 20 percent of their income to register as "organizations pursuing the interest of a foreign power " the law has sparked significant controversy within Georgia and internationally.

The research explores how key actors—the Georgian government, the opposition, and international stakeholders—have presented the law, each framing it in ways that align with their political interests and values. The Georgian Dream party and People's Power, who supported the law, primarily framed it as a necessary measure to protect Georgia's sovereignty and national identity, positioning it as a defense against foreign intervention. However, they also faced accusations of echoing the controversial "Russian law" on foreign agents, which restricts the activities of foreign-funded organizations. The opposition, along with international actors like the EU and the U.S., framed the law as a threat to Georgia's democracy, civil society, and its European future.

The core argument of the thesis is that the Georgian government's attempt to securitize the law as a national security threat has failed. Public resistance, as seen in large protests, and opposition from international partners, including sanctions and vocal support for Georgia's European aspirations, have shown that neither the Georgian public nor the international community has accepted the law as an existential threat to national security.

Santrauka

Šioje disertacijoje analizuojami skirtingi Gruzijos įstatymo „dėl užsienio įtakos skaidrumo“ rėmai ir tai, kaip vyriausybė, opozicijos prezidentas ir tarptautiniai partneriai jį įrėmino. 2023 m. pristatytą ir 2024 m. priimtą įstatymą Vyriausybė priėmė prieštaringai vertinamą įstatymo projektą „dėl užsienio įtakos skaidrumo“ į įstatymą. Jis verčia pilietinės visuomenės organizacijas, gaunančias daugiau nei 20 proc. pajamų iš užsienio, užsiregistruoti kaip „užsienio jėgos interesų siekiančias organizacijas“ įstatymas sukėlė nemažai diskusijų Gruzijoje ir tarptautiniu mastu.

Tyrime nagrinėjama, kaip pagrindiniai veikėjai - Gruzijos vyriausybė, opozicija ir tarptautiniai suinteresuotieji subjektai - pristatė įstatymą, kiekvienas iš jų pateikdami jį taip, kad jis atitiktų jų politinius interesus ir vertybes. Įstatymą parėmusios partijos „Gruzijos svajonė“ ir „Liaudies valdžia“ pirmiausia jį įvardijo kaip būtiną priemonę Gruzijos suverenitetui ir nacionaliniam identitetui apsaugoti, pateikdamos jį kaip gynybą nuo užsienio intervencijos. Tačiau jos taip pat sulaukė kaltinimų, kad atkartoja prieštaringai vertinamą „Rusijos įstatymą“ dėl užsienio agentų, kuris riboja užsienio finansuojamų organizacijų veiklą. Opozicija kartu su tarptautiniais veikėjais, tokiais kaip ES ir JAV, įstatymą įvardijo kaip grėsmę Gruzijos demokratijai, pilietinei visuomenei ir jos europinei ateičiai.

Pagrindinis disertacijos argumentas yra tas, kad Gruzijos vyriausybės bandymas sekurizuoti įstatymą kaip grėsmę nacionaliniam saugumui nepavyko. Visuomenės pasipriešinimas, pasireiškęs dideliais protestais, ir tarptautinių partnerių pasipriešinimas, įskaitant sankcijas ir garsiai reiškiamą paramą Gruzijos europiniams siekiams, parodė, kad nei Gruzijos visuomenė, nei tarptautinė bendruomenė nepripažino įstatymo kaip egzistencinės grėsmės nacionaliniam saugumui.