

# MASARYK DIPLOMATIC PROGRAM

Learn, network & make a change!

## Combating Disinformation at the Federal Level: The Czech and American Experiences

**KATHERINE BIRCH**



Embassy of the Czech Republic  
Washington, DC

**Author:**

Katherine Birch

**Mentor:**

Michal Thim



Ministry of Foreign Affairs  
of the Czech Republic



Embassy of the Czech Republic  
Washington, DC

The views and arguments in this document do not represent the official opinions of the Ministry of Foreign Affairs of the Czech Republic or the Embassy of the Czech Republic in Washington DC. The author is solely responsible for the content of the document.

**Combating Disinformation at the Federal Level: The Czech and American Experiences**

**Katherine E Birch**

**Masaryk Diplomatic Program**

**June 2022**

## ***Introduction***

On Friday April 27, 2022, the U.S. Department of Homeland Security (DHS) announced the creation of the now infamous Disinformation Governance Board. This entity, comprised of a panel serving as an “internal advisory board” for DHS, was to be spearheaded by Ms. Nina Jankowicz, an accomplished and respected researcher within the small but ever growing disinformation research community. More importantly, it was the first effort undertaken by the federal agency to “...coordinate countering misinformation related to Homeland Security”.<sup>1</sup> Ironically, the Disinformation Governance Board almost instantaneously fell prey to the very threat it so desired to protect our nation from: mis- and disinformation. Far-right influencers like Jack Posobiec quickly attacked the board—slapping it with the misleading, and certainly unflattering, moniker of the “Ministry of Truth”. This ominous, Orwellian title quickly became viral on the internet, and similarly skeptical sentiment was amplified by Republican officials like Missouri Attorney General Erich Schmitt, Representative Andrew S. Clyde (R-Ga), and former Congresswoman Tulsi Gabbard, on their own social media profiles.<sup>2</sup> In an apparent effort to provide policymakers with greater clarity regarding the entity, Secretary of Homeland Security Alejandro Mayorkas rushed to Capitol Hill days later, defending not only the board itself, but indeed Ms. Jankowicz as well, who had become the target of much online scrutiny, in both Senate and House hearings.<sup>3</sup> However, the damage was done. Just a few weeks later, on Wednesday, May 18, the Disinformation Governance Board was officially “paused”. It was clear that the Department of Homeland Security had spectacularly failed in its advertising of the entity to the American public— as well as to legislators on the Hill, whose staff had reportedly not been so much as been given a briefing on the Board’s creation—<sup>4</sup> as to *what* the Board was, what it would be *doing*, and *how* it would be carrying out its already ambiguous mission.

---

<sup>1</sup> Myers, Steven Lee. “A Panel to Combat Disinformation Becomes a Victim of It.” The New York Times, 18 May 2022, [www.nytimes.com/2022/05/18/technology/disinformation-governance-board.html](http://www.nytimes.com/2022/05/18/technology/disinformation-governance-board.html).

<sup>2</sup> Lorenz, Taylor. “How the Biden Administration Let Right-Wing Attacks Derail Its Disinformation Efforts.” Washington Post, 18 May 2022, [www.washingtonpost.com/technology/2022/05/18/disinformation-board-dhs-nina-jankowicz/](http://www.washingtonpost.com/technology/2022/05/18/disinformation-board-dhs-nina-jankowicz/).

<sup>3</sup> Barr, Luke. “DHS Plays Defense over Disinformation Governance Board.” ABC News, 5 May 2022, [abcnews.go.com/Politics/dhs-plays-defense-disinformation-governance-board/story?id=84520182](http://abcnews.go.com/Politics/dhs-plays-defense-disinformation-governance-board/story?id=84520182). Accessed 13 June 2022.

<sup>4</sup> Lorenz, Taylor. “How the Biden Administration Let Right-Wing Attacks Derail Its Disinformation Efforts.” Washington Post, 18 May 2022, [www.washingtonpost.com/technology/2022/05/18/disinformation-board-dhs-nina-jankowicz/](http://www.washingtonpost.com/technology/2022/05/18/disinformation-board-dhs-nina-jankowicz/).

The Department of Homeland Security's effort to establish a more centralized, agency-affiliated entity to monitor disinformation demonstrates the immense challenge that democratic governments inherently face when addressing disinformation: how to mitigate the intentional spread of pernicious, false information intent on sowing division among their populace without violating societal and legal norms regarding freedom of speech that their constitutions, as well as their citizens, aim to steadfastly preserve. So difficult is this endeavor that even amidst recent bipartisan calls from Congress for DHS to invigorate its counter-disinformation efforts against disinformation campaigns conducted by foreign adversaries,<sup>5</sup> recommendations from federal entities such as the U.S. Cyberspace Solarium Commission (CSC) for DHS to create an entity specifically for this purpose,<sup>6</sup> and according to a 2021 Pew Research Study, an unprecedented level of public support for the federal government to more proactively restrict false information found online,<sup>7</sup> the effort *still* fell flat on its face. As frustrating as this flunked initiative may be to many disinformation researchers, American citizens, and policymakers alike, comparing the U.S. federal response to disinformation to those of key allies also engaged in this battle may one day elucidate better practices when crafting future anti-disinformation policies.

Once hailed as having a "leading role in Europe's response to disinformation" by Giles Portman, the former head of the European Union's EEAS East StratCom Task Force,<sup>8</sup> the Czech Republic serves as an interesting case study to contrast the United States' own experience to in addressing disinformation at the federal level, especially given its status as the first European country to orchestrate a state-level response to disinformation.<sup>9</sup> In an effort to provide an easily-digestible yet comprehensive overview of both countries' national responses to this ever-evolving cyber threat, this paper attempts to answer the following research question: What

---

<sup>5</sup> "Countering Disinformation in the United States." [www.solarium.gov](http://www.solarium.gov), U.S. Cyberspace Solarium Commission, Dec. 2021, [www.solarium.gov/public-communications/disinformation-white-paper](http://www.solarium.gov/public-communications/disinformation-white-paper). Accessed 13 June 2022.

<sup>6</sup> *Ibid*, 3.

<sup>7</sup> Mitchell, Amy, and Mason. "More Americans Now Say Government Should Take Steps to Restrict False Information Online than in 2018." Pew Research Center, 18 Aug. 2021, [www.pewresearch.org/fact-tank/2021/08/18/more-americans-now-say-government-should-take-steps-to-restrict-false-information-online-than-in-2018/](http://www.pewresearch.org/fact-tank/2021/08/18/more-americans-now-say-government-should-take-steps-to-restrict-false-information-online-than-in-2018/).

<sup>8</sup> Colborne, Michael. "The Brief Life, and Looming Death, of Europe's "SWAT Team for Truth." Foreign Policy, 20 Sept. 2017, [foreignpolicy.com/2017/09/20/the-brief-life-and-looming-death-of-europes-swat-team-for-truth-fake-news/](http://foreignpolicy.com/2017/09/20/the-brief-life-and-looming-death-of-europes-swat-team-for-truth-fake-news/). Accessed 13 June 2022.

<sup>9</sup> Jankowicz, Nina. HOW TO LOSE the INFORMATION WAR: Russia, Fake News, and the Future of Conflict. S.L., I B Tauris, 2021.

similarities and differences are demonstrated in the characteristics of Czech and U.S. state-level efforts in addressing disinformation since 2015? Through an analysis of scholarly works, think-tank reports, publicly available government documents, and news articles, two primary similarities and four differences can be discerned from these nations' state-level policy responses over the past seven years. The limitations of this research, though, must be noted. No consensus exists among researchers on how to measure the efficacy of both disinformation campaigns and counter-disinformation policy efforts as of yet, and during the course of this research, no open-source assessments of government-led policies published by the Czech or U.S. governments were found. Thus, this paper is unable to definitively articulate which anti-disinformation policies— or which way of implementing such policies— is more effective than another in thwarting disinformation.

Despite this limitation, this research hopes to contribute to existing scholarly work by portraying the lay-of-the-land regarding state-driven anti-disinformation policies undertaken by the Czech Republic and the United States, key allies whose citizens are known targets of disinformation campaigns for future researchers who *will* one day be equipped with the methods necessary to compare and contrast the effectiveness of certain policies after having access to previous foundational research such as this that neatly outlines historic state-level responses. The following pages of this research paper are divided into three sections. The first section briefly explores how both countries conceptualize disinformation and shares insight of their unique disinformation ecosystems. The second and third sections of this research examine the differences and similarities between the characteristics of each nation's state-level efforts to address and combat disinformation within their borders respectively.

### ***Varying Conceptualizations and Ecosystems***

Before diving into a discussion of state-led policy responses that the Czech Republic and the United States have taken in response to this new-age cybersecurity dilemma, it is imperative to first comprehend, at a basic level, how disinformation is conceptualized by both countries' leadership and contextualize the information ecosystems in which disinformation is primarily spread among its citizens. Disinformation, defined as "...false information that is deliberately

created or disseminated with the express purpose to cause harm,”<sup>10</sup> is the accepted definition utilized by the U.S. Cyberspace Solarium Commission in its December 2021 “Disinformation in the United States” white paper that examined the United States’ disinformation ecosystem, analyzed actions taken by the U.S. Government as a whole to address the issue thus far, and proposed seven policy recommendations to Washington that would facilitate a more robust approach to this problem. Additionally, the commission hinted that disinformation, which has been historically perceived as an issue outside of the realm of cybersecurity by the U.S., should be included in the general cybersecurity conceptual umbrella moving forward.<sup>11</sup> According to the Czech Ministry of the Interior, disinformation is defined as the “...systematic and intentional spread of false information mainly by state actors or its affiliates against foreign state or media with the aim to influence decision-making or opinions of those, who adopt decisions”.<sup>12</sup> Although not vastly different from its American counterpart, the Czech government’s conceptualization of disinformation appears to express a greater willingness to explicitly associate foreign governments as actors within the global disinformation ecosystem and showcases a less ambiguous target audience than the “American” definition traditionally recognized within the U.S. government. Regardless, explaining the reasoning behind these diverging definitions lies beyond the scope of this research.

Concerning the primary “vectors,” which can be understood as the ways in which information spreads, social media networks are widely considered to be the primary vector of disinformation in the American disinformation ecosystem alongside others like print media, online sources, radio, and television.<sup>13</sup> However, social media networks, in the U.S. case, rest above these others, so much so that the CSC has claimed that, “Any discussion of disinformation necessarily involves social media platforms.”<sup>14</sup> From these vectors, disinformation campaigns, especially those conducted by Russian entities and directed at American audiences, largely exploit topics ranging from race relations and the “anti-vaxx” movement to NATO military

---

<sup>10</sup> “Countering Disinformation in the United States.” [www.solarium.gov](http://www.solarium.gov), U.S. Cyberspace Solarium Commission, Dec. 2021, [www.solarium.gov/public-communications/disinformation-white-paper](http://www.solarium.gov/public-communications/disinformation-white-paper). Accessed 13 June 2022.

<sup>11</sup> *Ibid*, 4.

<sup>12</sup> Filipec, Ondrej. “Building an Information Resilient Society: An Organic Approach.” *Cosmopolitan Civil Societies: An Interdisciplinary Journal*, vol. 11, no. 1, 27 Mar. 2019, pp. 1–26, 10.5130/ccs.v11.i1.6065.

<sup>13</sup> “Countering Disinformation in the United States.” [www.solarium.gov](http://www.solarium.gov), U.S. Cyberspace Solarium Commission, Dec. 2021, [www.solarium.gov/public-communications/disinformation-white-paper](http://www.solarium.gov/public-communications/disinformation-white-paper). Accessed 13 June 2022.

<sup>14</sup> *Ibid*, 8.

exercises occurring in Europe, the National Guard, and as many have witnessed during the past two years, COVID-19 conspiracy theories.<sup>15</sup>

In the case of the Czech Republic, much of the scholarship analyzing how disinformation is spread among its citizens focuses on two primary vectors: “alternative” news websites and conspiracy-laden chain emails. (Social media platforms, while acknowledged as a vector, do not have the range and emphasis placed upon them that these aforementioned ones do, as fewer than 15% of Czechs are reported to use Twitter and “roughly half” of the country regularly uses Facebook.)<sup>16</sup> Alongside Sputnik.cz, the Czech branch of the notorious news agency that first comes to mind for many with a rudimentary understanding of Russian influence operations, other Czech-language alternative news sites such as Aeronet.cz, AC24, První Zprávy, and Parlamentní listy, with the latter reported to entertain an astounding eight million readers per month,<sup>17</sup> play a large role in the echochamber of pro-Russian disinformation in the country.<sup>18</sup> Interestingly enough, in a vector not widely reported, if at all, among countries targeted by foreign disinformation campaigns is the curious usage of chain emails. These chain emails are often replete with inflammatory, emotionally-charged language and unprofessional formatting. According to a study conducted by researchers at Palacký University in Olomouc, Czech Republic, chain emails containing disinformation were sent to 90% of Czech citizens aged 65 years or older. Further, these emails were then discovered to be spread by 35% of older citizens between the ages 55 and 64 and 47% of those older than 65 years. This was a shockingly impressive scope of exposure, and these statistics determined that a majority of Czech pensioners are “...attacked daily by disinformation” through these emails.<sup>19</sup> Finally, corrosive disinformation narratives touted among these vectors in the Czech Republic often center around the following themes: distrust for Brussels and Washington, anti-Islam, and anti-migration.<sup>20</sup>

---

<sup>15</sup> “Countering Disinformation in the United States.” [www.solarium.gov](http://www.solarium.gov), U.S. Cyberspace Solarium Commission, Dec. 2021, [www.solarium.gov/public-communications/disinformation-white-paper](http://www.solarium.gov/public-communications/disinformation-white-paper). Accessed 13 June 2022.

<sup>16</sup> Jankowicz, Nina. *HOW to LOSE the INFORMATION WAR: Russia, Fake News, and the Future of Conflict*. S.L., I B Tauris, 2021.

<sup>17</sup> Schultheis, Emily. “The Czech Republic’s Fake News Problem.” *The Atlantic*, 21 Oct. 2017, [www.theatlantic.com/international/archive/2017/10/fake-news-in-the-czech-republic/543591/](http://www.theatlantic.com/international/archive/2017/10/fake-news-in-the-czech-republic/543591/). Accessed 13 June 2022.

<sup>18</sup> Krejčí, Markéta. “The Ins and Outs of the Czech Disinformation Community.” *New Eastern Europe*, 8 Nov. 2017, [neweasterneurope.eu/2017/11/08/ins-outs-czech-disinformation-community/](http://neweasterneurope.eu/2017/11/08/ins-outs-czech-disinformation-community/). Accessed 13 June 2022.

<sup>19</sup> Filipec, Ondrej. “Building an Information Resilient Society: An Organic Approach.” *Cosmopolitan Civil Societies: An Interdisciplinary Journal*, vol. 11, no. 1, 27 Mar. 2019, pp. 1–26, 10.5130/ccs.v11.i1.6065.

<sup>20</sup> Jankowicz, Nina. *HOW to LOSE the INFORMATION WAR: Russia, Fake News, and the Future of Conflict*. S.L., I B Tauris, 2021.



With this context in mind, a proper examination of the characteristics between both governments' addressment of disinformation at the federal level may begin.

### *Differences*

First, the Czech Republic politically recognized the threat that disinformation campaigns posed by nations like Russia and articulated policy recommendations to combat this danger in its public-facing strategic security documents before the United States acknowledged within its own. While the topic of disinformation largely entered American public discourse in the aftermath of the 2016 U.S. Presidential Election, it is reported to have already permeated Czech public and political discourse in 2014 following Russia's illegal annexation of the Crimean Peninsula.<sup>21</sup> This prior exposure facilitated a rather prompt response from the Czech Government in the following three years worth of strategic security documents from 2015 onward. The Czech National Security Strategy of 2015,<sup>22</sup> for example, points out the threat posed by state-orchestrated disinformation campaigns— alongside other perceived methods of hybrid warfare like cyber attacks, propaganda, and “unmarked military personnel”— to the Czech Republic and its allies. Despite there being a general understanding that Russia was a key player in orchestrating such disinformation campaigns, the document conservatively refrained from explicitly stating the nations the country believed to be partaking in these efforts. As the topic of disinformation campaigns continued to garner greater public and political interest, the Czech Security Information Service's (BIS) publication of the Czech National Security Audit of 2016 dove deeper into examining the challenge within the “Influence of Foreign Powers” portion of its report, exploring the specific threats disinformation poses to the Czech Republic, weaknesses present in the country's administrative infrastructure and society exploited by disinformation campaigns, and proposing a fourteen-point set of policy recommendations to bolster the Czech Republic's ability to mitigate the disinformation campaigns' potency.<sup>23</sup> By 2017, the previous hesitancy to associate specific countries as actors within the disinformation ecosystem appears to have dissipated, as evidenced by the Czech Defense Strategy of 2017 being the country's first strategic security document to explicitly associate and condemn Russia for intentionally utilizing

---

<sup>21</sup> Jakub, Fišer. EU and Czech Countermeasures against Disinformation. 9 Sept. 2020, [dspace.cuni.cz/handle/20.500.11956/120762?show=full](https://dspace.cuni.cz/handle/20.500.11956/120762?show=full).

<sup>22</sup> Security Strategy of the Czech Republic. The Ministry of Defense of the Czech Republic, 2015.

<sup>23</sup> “National Security Audit.” Mvcr.cz, 2015, [www.mvcr.cz/cthh/soubor/national-security-audit.aspx](http://www.mvcr.cz/cthh/soubor/national-security-audit.aspx).

hybrid methods— especially disinformation campaigns and cyberattacks— against the Czech Republic and other NATO allies.<sup>24</sup>

In contrast, it was not until two years after the Czech Republic first acknowledged disinformation as a security threat in 2015 that the United States followed suit and formally recognized it as well. Disinformation is first mentioned as a tool weaponized by foreign adversaries in the Trump Administration’s 2017 National Security Strategy.<sup>25</sup> In addition to this claim, the document pledges to prioritize American efforts moving forward to counter such disinformation and propaganda. Despite this later acknowledgement, the understanding of the dangers of disinformation campaigns fortunately appears to transcend administrations as well, with the Biden Administration’s Interim National Security Strategy, released in March of 2021, recently naming disinformation as a “national security priority”.<sup>26</sup>

Beyond merely the layered timelines in which disinformation was denoted as a threat within the United States and the Czech Republic’s strategic security documents, another difference can be spotted in these governments’ efforts to authorize entities to address disinformation. In this matter, the U.S. government has historically demonstrated a far more decentralized approach to creating government-run anti-disinformation initiatives than the Czech government. These entities span a variety of government agencies and task forces aimed at countering disinformation, whether that be through monitoring and debunking prevalent disinformation narratives or educating the public with their work. Additionally, they tend to have unique focuses under their purview.

The first of such entities to be established within the U.S. government was the Global Engagement Center (GEC). Born from Executive Order 13721 in 2016, the GEC is currently under the jurisdiction of the U.S. Department of State. According to its website, the GEC’s formal mission is to “...direct, lead, synchronize, integrate, and coordinate efforts of the Federal Government to recognize, understand, expose, and counter foreign state and non-state propaganda and disinformation efforts aimed at undermining or influencing the policies, security,

---

<sup>24</sup> The Defense Strategy of the Czech Republic. Ministry of Defense of the Czech Republic, Apr. 2017.

<sup>25</sup> “National Security Strategy [December 2017].” Hsdl.org, 2017, [www.hsdl.org/?abstract&did=806478](http://www.hsdl.org/?abstract&did=806478), <https://www.hsdl.org/?view&did=806478>.

<sup>26</sup> Biden, Joseph. INTERIM NATIONAL SECURITY STRATEGIC GUIDANCE. The White House, Mar. 2021.

or stability of the United States, its allies, and partner nations.”<sup>27</sup> Upon taking a look at its published work thus far, the GEC appears to have remained true to its mission, with reports ranging from examining the outlets utilized in Russia’s disinformation ecosystem to China’s role in pumping out Kremlin-fueled narratives to a wider audience. Understanding that dismantling common disinformation narratives— especially those with international security implications— is not only important for the American public, the website ensures that its reports and articles are accessible in a multitude of languages, strengthening its own global reach. These languages include Arabic, French, Chinese, Portuguese, Russian, Spanish, and Ukrainian. Second, there is the Foreign Influence Task Force, representing a more domestic orientation. Established in the fall of 2017 by the Federal Bureau of Investigations (FBI), this task force coordinates the operations of Counterintelligence, Cyber, Criminal, and Counterterrorism Divisions to conduct investigations, facilitate information sharing among multiple stakeholders, and strengthen private-sector partnerships regarding disinformation.<sup>28</sup>

Following the creation of the GEC and the Foreign Influence Task Force stands a third and more narrowly-focused federal entity: the Cybersecurity and Infrastructure Security Agency (CISA). Established in November of 2018 through former President Donald Trump’s signing of the Cybersecurity and Infrastructure Security Agency Act, it falls under the jurisdiction of the Department of Homeland Security.<sup>29</sup> This collaborative, multifaceted entity spearheads the United States’ federal effort to defend critical infrastructure from both cybersecurity and physical threats. Soon after its creation, one of its first and most vital projects was to combat disinformation narratives that reared their ugly heads during the lead up to the 2020 U.S. Presidential Election. (While at first glance elections may not appear to fall into the critical infrastructure category, election infrastructure was designated as a subset of Government Facilities critical infrastructure in 2017.)<sup>30</sup> According to the CSC, CISA notably utilized a

---

<sup>27</sup> “Global Engagement Center.” United States Department of State, [www.state.gov/bureaus-offices/under-secretary-for-public-diplomacy-and-public-affairs/global-engagement-center/](http://www.state.gov/bureaus-offices/under-secretary-for-public-diplomacy-and-public-affairs/global-engagement-center/).

<sup>28</sup> “The FBI Launches a Combating Foreign Influence Webpage — FBI.” [www.fbi.gov](http://www.fbi.gov), 20 Aug. 2018, [www.fbi.gov/news/press-releases/press-releases/the-fbi-launches-a-combating-foreign-influence-webpage](http://www.fbi.gov/news/press-releases/press-releases/the-fbi-launches-a-combating-foreign-influence-webpage). Accessed 13 June 2022.

<sup>29</sup> Keyser, Carl. “CISA: What Is It and What Does It Do?” [www.security7.net](http://www.security7.net), 9 Dec. 2020, [www.security7.net/news/cisa-what-is-it-and-what-does-it-do](http://www.security7.net/news/cisa-what-is-it-and-what-does-it-do).

<sup>30</sup> “Statement by Secretary Johnson on the Designation of Election Infrastructure as a Critical Infrastructure Subsector.” Department of Homeland Security, 6 Jan. 2017, [www.dhs.gov/news/2017/01/06/statement-secretary-johnson-designation-election-infrastructure-critical](http://www.dhs.gov/news/2017/01/06/statement-secretary-johnson-designation-election-infrastructure-critical).

counter-disinformation technique called “prebunking,” in which an entity “...preemptively warns of and exposes” disinformation narratives, most likely before they proliferate on a massive scale, in the months before the 2020 U.S. Presidential Election through an online platform entitled [rumorcontrol.gov](http://rumorcontrol.gov).<sup>31</sup> Although no quantitative evidence was found in the course of this research that “prebunking” via online platforms was effective, it appears to be a popular practice among federal entities. Hoping to emulate the perceived success of this method, it is reported that other federal agencies, such as the Department of Defense (DoD), Federal Emergency Management Agency (FEMA), the Department of Justice (DoJ), and the Federal Trade Commission, as well as the states of Colorado and Maryland, have adopted this counter-disinformation model.<sup>32</sup>

Representing the fourth government-orchestrated counter-disinformation enterprise is the “Protected Voices Initiative” led by the FBI in coordination with the Office of the Director of National Intelligence (ODNI) and DHS. This three-agency joint effort aims to supply resources to corporations, individuals, and most notably, political campaigns, that want to safeguard themselves from cyberattacks and foreign influence campaigns.<sup>33</sup> A fifth federal agency exists in the Foreign Malign Influence Center under the jurisdiction of the ODNI. Founded in April of 2021, this relatively recent entity builds upon existing ODNI efforts to better understand disinformation through reporting on and collecting assessments on disinformation written by the U.S. Intelligence Community (IC).<sup>34</sup> Finally, there is the Mis- Dis- and Malinformation Team (MDM) team within the jurisdiction of the previously mentioned CISA. This entity brings together a number of relevant stakeholders in the disinformation arena ranging from social media companies and international partners to the federal government and the private sector. The MDM’s website describes its team as a “...switchboard for routing disinformation concerns to appropriate social media platforms and law enforcement.”<sup>35</sup> Since 2018, the MDM team in particular has served as CISA’s tool of choice for aiding local and federal election officials to

---

<sup>31</sup> “Countering Disinformation in the United States.” [Www.solarium.gov](http://www.solarium.gov), U.S. Cyberspace Solarium Commission, Dec. 2021, [www.solarium.gov/public-communications/disinformation-white-paper](http://www.solarium.gov/public-communications/disinformation-white-paper). Accessed 13 June 2022.

<sup>32</sup> *Ibid*, 13.

<sup>33</sup> “Protected Voices.” Federal Bureau of Investigation, [www.fbi.gov/investigate/counterintelligence/foreign-influence/protected-voices](http://www.fbi.gov/investigate/counterintelligence/foreign-influence/protected-voices).

<sup>34</sup> “Countering Disinformation in the United States.” [Www.solarium.gov](http://www.solarium.gov), U.S. Cyberspace Solarium Commission, Dec. 2021, [www.solarium.gov/public-communications/disinformation-white-paper](http://www.solarium.gov/public-communications/disinformation-white-paper). Accessed 13 June 2022.

<sup>35</sup> “MDM | CISA.” [www.cisa.gov](http://www.cisa.gov), [www.cisa.gov/mdm#:~:text=The%20MDM%20team%20serves%20as](http://www.cisa.gov/mdm#:~:text=The%20MDM%20team%20serves%20as). Accessed 13 June 2022.

combat the spread of disinformation narratives related to fictitious reporting of the “...time, place, and manner of voting”.<sup>36</sup>

By contrast, the Czech Government has showcased a much more centralized approach to the creation of state-affiliated entities, and individual positions, with the mission of countering disinformation campaigns. For example, as of 2022, the only standing federal anti-disinformation agency in the Czech Republic is the Center for Terrorism and Hybrid Threats (CTHT). Born out of recommendations proposed in the 2016 National Security Audit, the center began its operations in 2017 under the jurisdiction of the Ministry of the Interior.<sup>37</sup> Its announcement was not without fanfare, though. Similar to the outcry witnessed with the announcement of the DHS’ Disinformation Governance Board, the CTHT garnered criticism with its announcement from some of the highest-ranking officials in the government—including then Czech President Milos Zeman and members of his administration. (It is important to note, however, that according to the CTHT’s Chief, Eva Romancavova, President Zeman had not raised any concerns about the center or its work during any consultations throughout its formulation process.)<sup>38</sup> Despite the political and societal muttering that its announcement temporarily caused, the CTHT continues to work heavily with civil society and the media to “monitor and provide analysis” over disinformation campaigns targeting topics that are pertinent to “Czech internal security”.<sup>39</sup> The CTHT also draws a hard, red-line for the public at what it does *not* do. On its website, the center takes great care to explicitly articulate that it does not have the authority to censor media content, take legal punitive actions against any individuals or entities, or “force the truth” on the citizens it serves.<sup>40</sup>

Aside from this entity, the Czech government has taken proactive measures to establish “Special Envoy” positions relating to hybrid warfare. One post in particular, the Special Envoy for Resilience and New Threats, was authorized in September 2019 and resides under the

---

<sup>36</sup> Ibid.

<sup>37</sup> Jakub, Fišer. EU and Czech Countermeasures against Disinformation. 9 Sept. 2020, [dspace.cuni.cz/handle/20.500.11956/120762?show=full](https://dspace.cuni.cz/handle/20.500.11956/120762?show=full).

<sup>38</sup> “Czech “Hybrid Threats” Center under Fire from Country’s Own President.” Reuters, 4 Jan. 2017, [www.reuters.com/article/us-czech-security-hybrid/czech-hybrid-threats-center-under-fire-from-countrys-own-presid-ent-idUSKBN14O227](https://www.reuters.com/article/us-czech-security-hybrid/czech-hybrid-threats-center-under-fire-from-countrys-own-presid-ent-idUSKBN14O227). Accessed 13 June 2022.

<sup>39</sup> Jakub, Fišer. EU and Czech Countermeasures against Disinformation. 9 Sept. 2020, [dspace.cuni.cz/handle/20.500.11956/120762?show=full](https://dspace.cuni.cz/handle/20.500.11956/120762?show=full).

<sup>40</sup> “Centre against Terrorism and Hybrid Threats - Terorismus a Měkké Cíle.” [Www.mvcr.cz, www.mvcr.cz/cthh/clanek/centre-against-terrorism-and-hybrid-threats.aspx](https://www.mvcr.cz/cthh/clanek/centre-against-terrorism-and-hybrid-threats.aspx).

jurisdiction of the Ministry of Foreign Affairs. Its work was concerned with disinformation and the government's strategic communication,<sup>41</sup> and the first individual to ascend to this post was Mr. Jiří Šedivý, an accomplished scholar and public servant in the European foreign policy making realm. However, his time in this role was short-lived, as in May 2020 he became the Director General of the European Defense Agency (EDA).<sup>42</sup> Since then, it appears that the Special Envoy for Resilience and New Threats position has been either disbanded or left vacant given its absence as an existing Special Envoy post on the Czech Ministry of Foreign Affairs' website, last updated on April 26, 2022.<sup>43</sup> This forgone Special Envoy post, however, seems to have been replaced as of this year. On March 28, 2022, Radio Prague International reported that the government had created a "special representative for media and disinformation" and that Michal Klíma, an established professional within the Czech media and civil society sphere, would assume this role.<sup>44</sup> Publicly available online information relating to this position—including a standardized, formal title—is hard to find, likely due to the recent nature of this development. What was discovered, though, is that this position will be collaborating with the Ministry of the Interior, the Ministry of Foreign Affairs, and the Ministry of Defense to better address state-led disinformation campaigns, improve the country's strategic communications, and update Czech legislation regarding public service media.<sup>45</sup> These focuses seem quite similar to the former Special Envoy for Resilience and New Threats' previous objectives. Overall, the multitude of state-led initiatives, task forces, and centers spanning across multiple federal agencies, each with their own unique anti-disinformation orientations, on the side of the U.S. stands in stark contrast to the two standing entities formed by the Czech government thus far.

When comparing the actions taken by both countries' legislative branches, it appears that there is a larger appetite for a legal response to disinformation among policymakers within U.S.

---

<sup>41</sup> Jakub, Fišer. EU and Czech Countermeasures against Disinformation. 9 Sept. 2020, [dspace.cuni.cz/handle/20.500.11956/120762?show=full](https://dspace.cuni.cz/handle/20.500.11956/120762?show=full).

<sup>42</sup> "Jiří Šedivý - Groupe d'Études Géopolitiques." <https://Geopolitique.eu/>, [geopolitique.eu/en/authors/jiri-sedivy/](https://geopolitique.eu/en/authors/jiri-sedivy/). Accessed 13 June 2022.

<sup>43</sup> "Special Envoys | Ministry of Foreign Affairs of the Czech Republic." [www.mzv.cz](http://www.mzv.cz), 26 Apr. 2022, [www.mzv.cz/jnp/en/about\\_the\\_ministry/organization\\_of\\_the\\_ministry/special\\_envoys\\_1/index.html](http://www.mzv.cz/jnp/en/about_the_ministry/organization_of_the_ministry/special_envoys_1/index.html). Accessed 13 June 2022.

<sup>44</sup> "New Government Media Advisor: "Disinformation Isn't Covered by Freedom of Speech."" Radio Prague International, 28 Mar. 2022, [english.radio.cz/new-government-media-advisor-disinformation-isnt-covered-freedom-speech-8746083](http://english.radio.cz/new-government-media-advisor-disinformation-isnt-covered-freedom-speech-8746083). Accessed 13 June 2022.

<sup>45</sup> Ibid.

Congress than in the Czech Parliament, representing the third difference discerned in this research. Throughout the course of this research, no legal statutes with the express purpose of countering disinformation were found to have been passed by the Czech Parliament. This does not translate to a non-existent interest in disinformation as a legislative body, however. In July of 2020, a Standing Commission on Hybrid Threats—a term that the Czech security sphere uses to encompass an array of non-military threats including disinformation campaigns—was established in the Chamber of Deputies, the Lower House of the Czech Parliament. Beyond this, however, action has been rather lackluster. In the opinion of some scholars, while the Czech government has long been willing to politically address and theoretically define disinformation on their own terms, government institutions such as Parliament are rather cautious in openly dictating what is and is not disinformation in practice. Instead, there is “...a general willingness to offload this issue [disinformation] to the EU level.”<sup>46</sup>

Compared to the Czech Parliament, this hesitancy to address disinformation through legislation has seemingly diminished throughout the past few years in Congress. Since 2016, congressional interest in dis- and misinformation has dramatically increased. According to the U.S. Cyberspace Solarium Commission, in the 113th Session of Congress (from 2013-2014), only two bills even included the words “misinformation” and none included the word “disinformation”. Five years later, in the 116th Session of Congress (from 2019-2021) nearly 100 bills referencing mis- and disinformation were introduced in this period alone. So far in the 117th Session of Congress, lawmakers have introduced more than forty bills referencing mis- and disinformation as of December 2021. With almost a year left to go in this current session, a record number of bills are expected to be introduced regarding this new-age cybersecurity threat.<sup>47</sup> It is imperative to note, however, that this congressional eagerness to combat disinformation is far from unanimous; there are huge levels of political bipartisanship when discussing how best to curb disinformation. With no higher authority to potentially “offload” the disinformation dilemma to, it appears that Congress is more inclined to dig its teeth into the issue.

---

<sup>46</sup> Jakub, Fišer. EU and Czech Countermeasures against Disinformation. 9 Sept. 2020, [dspace.cuni.cz/handle/20.500.11956/120762?show=full](https://dspace.cuni.cz/handle/20.500.11956/120762?show=full).

<sup>47</sup> “Countering Disinformation in the United States.” [www.solarium.gov](https://www.solarium.gov), U.S. Cyberspace Solarium Commission, Dec. 2021, [www.solarium.gov/public-communications/disinformation-white-paper](https://www.solarium.gov/public-communications/disinformation-white-paper). Accessed 13 June 2022.

Finally, the U.S. government has historically had much more engagement with social media companies in its federal disinformation response than the Czech government has, especially in attempting to hold them accountable for their role as vectors within the disinformation ecosystem. In April 2018, news headlines across the world reported as Facebook CEO Mark Zuckerberg was summoned to Capitol Hill to answer lawmakers about Facebook's role in selling users' data to Cambridge Analytica, a business deal with severe ramifications that transcended the blue borders of Facebook's app to impact Americans' trust in not only the social media platforms they used but in the integrity of U.S. Presidential Elections as well.<sup>48</sup> Zuckerberg and fellow tech-giant CEOs Sundar Pichai of Google, and Jack Dorsey of Twitter, once again made a high-stakes visit back to Washington in March of 2021 to answer lawmakers' questions about their platforms' roles as conduits of mis- and disinformation relating to issues ranging from body image concerns in children to the January 6th Capitol Hill Riot.<sup>49</sup> Zuckerberg, Pichai, and Dorsey have made no such visits to Prague. (Understandably, this is likely the case due not only to Washington's much closer geographic proximity to Silicon Valley but also because of the vastly different disinformation environments between these two countries that require different stakeholders' involvement. Engaging with massive, U.S.-based social media tech companies is perhaps not Prague's priority when its primary domestically-based vectors of disinformation are chain emails and alternative news websites.)

Actual engagement between tech companies and the U.S. government has been reported, although quite vaguely, as well. Alphabet, the parent company of both YouTube and Google, in particular has been reported to actively collaborate with the U.S. government and relevant law enforcement agencies to "better insulate elections" from the spread of disinformation, especially on some of its most popular services like Google Search, Google News, and YouTube.<sup>50</sup> Individual lawmakers themselves, such as U.S. Senator Mark Warner of Virginia, have even taken the initiative to remind certain tech companies such as Meta, Reddit, and TikTok in publicly available letters about the dangers of Russian-orchestrated disinformation campaigns

---

<sup>48</sup> Cohen, Raphael S., et al. "Combating Foreign Disinformation on Social Media: Study Overview and Conclusions." [www.rand.org](http://www.rand.org), 19 July 2021, [www.rand.org/pubs/research\\_reports/RR4373z1.html](http://www.rand.org/pubs/research_reports/RR4373z1.html).

<sup>49</sup> Conger, Kate. "Big Tech C.E.O.s Face Lawmakers on Disinformation." *The New York Times*, 25 Mar. 2021, [www.nytimes.com/live/2021/03/25/business/social-media-disinformation](http://www.nytimes.com/live/2021/03/25/business/social-media-disinformation).

<sup>50</sup> Cohen, Raphael S., et al. "Combating Foreign Disinformation on Social Media: Study Overview and Conclusions." [www.rand.org](http://www.rand.org), 19 July 2021, [www.rand.org/pubs/research\\_reports/RR4373z1.html](http://www.rand.org/pubs/research_reports/RR4373z1.html).



proliferating on their platforms, as well as admonishments to Alphabet for allowing YouTube to profit from advertising revenue associated with known Russian state-affiliated outlets.<sup>51</sup>

In contrast, Czech domestic political will to even attempt to coordinate with social media companies and curb disinformation outside of its preliminary support for the European Union’s Digital Services Act — a landmark piece of legislation that has only recently begun the process of being reviewed for approval by the Czech Republic’s elected representatives to the European Parliament— appears to be lacking.<sup>52</sup> The Czech Republic’s presence was also notably missing when the prime ministers of critical regional allies from Poland, Latvia, Lithuania, and Estonia penned open letters demanding social media platforms’ CEOs to “pick a side” in combating Kremlin-concocted disinformation about the war in Ukraine within their companies on February 27, 2022.<sup>53</sup> Just months earlier in November 2021, Czech MPs were reported to have passed the first reading of an amendment that sought to criminalize social media entities for censoring content deemed to be within the public’s interest in an effort to combat “cancel culture”, essentially loosening the content moderation reigns.<sup>54</sup> This development showcased a vastly different take from other European countries’ efforts to regulate online platforms. Thus, Prague’s only endeavor to engage with social media corporations in a fashion that would hold them more legally and financially accountable for allowing disinformation to run rampant on their platforms has seemingly been executed within the confines of multilateral institutions as opposed to independently. This contrasts greatly with Washington’s slow but growing coordination with tech giants like Alphabet and visible insistence that the leaders of tech companies directly answer lawmakers’ most pressing questions.

---

<sup>51</sup> “Warner Urges CEOs of Major Tech Companies to Take Actions to Curb Russian Information Operations.” Mark R. Warner, 25 Feb. 2022, [www.warner.senate.gov/public/index.cfm/2022/2/warner-urges-ceos-of-major-tech-companies-to-take-actions-to-curb-russian-information-operations](http://www.warner.senate.gov/public/index.cfm/2022/2/warner-urges-ceos-of-major-tech-companies-to-take-actions-to-curb-russian-information-operations). Accessed 13 June 2022.

<sup>52</sup> “European Union Reaches Agreement on Digital Services Act.” JD Supra, 6 May 2022, [www.jdsupra.com/legalnews/european-union-reaches-agreement-on-5835854/](http://www.jdsupra.com/legalnews/european-union-reaches-agreement-on-5835854/). Accessed 13 June 2022.

<sup>53</sup> Presse, AFP-Agence France. “Baltics, Poland Urge Social Media Giants to Curb “Russian Disinformation.”” [www.barrons.com](http://www.barrons.com), 28 Feb. 2022, [www.barrons.com/news/baltics-poland-urge-social-media-giants-to-curb-russian-disinformation-01646062508](http://www.barrons.com/news/baltics-poland-urge-social-media-giants-to-curb-russian-disinformation-01646062508). Accessed 13 June 2022.

<sup>54</sup> Hutt, David. “How the Czech Right Is Fighting Back against “Cancel Culture.”” Euronews, 11 May 2021, [www.euronews.com/2021/05/11/how-the-right-wing-is-fighting-back-against-cancel-culture-in-the-czech-republic](http://www.euronews.com/2021/05/11/how-the-right-wing-is-fighting-back-against-cancel-culture-in-the-czech-republic). Accessed 13 June 2022.

### *Similarities*

As previously mentioned at the beginning of this research, there are not only differences apparent between Washington and Prague's state-level addressment of disinformation. Similarities exist, too. First, both the U.S. and Czech governments have been active in supporting and/or initiating greater anti-disinformation efforts within the international organizations that they are member states of. For example, the Czech Republic did not shy away from voting in favor, along with its fellow European Union (EU) member states, in establishing the first EU-level response to Russian disinformation threats in 2017: the EEAS East StratCom Task Force.<sup>55</sup> As described on its website, the EEAS East StratCom Task Force does not engage in counter-propaganda activities; instead, its major priorities are to "...explain and promote the European Union's policies in the Eastern Neighborhood, to identify and expose disinformation, and to strengthen the media environment in the region."<sup>56</sup> In regards to this second point, the EEAS East StratCom Task Force has done an impressive job managing the flagship anti-disinformation website [www.EUvsDisinfo.eu](http://www.EUvsDisinfo.eu) and releasing its weekly online publication, the *Disinformation Review*, for members of the public and disinformation researchers alike. Likewise, the Czech Republic has served as a participating member of the EU and NATO's joint institutional effort to combat disinformation since 2018:<sup>57</sup> the European Center of Excellence for Countering Hybrid Threats (Hybrid COE)— not to be confused with the EU's EEAS East StratCom Task Force or NATO's Strategic Communications Center of Excellence (StratCom COE).<sup>58</sup> Finally, although it is not a sponsoring nation of NATO's Riga-based StratCom COE, the country has sent many of its own national disinformation experts to serve at both StratCom COE and the EEAS StratCom Task Force, a key indicator of its eagerness to contribute to multilateral counter-disinformation efforts.<sup>59</sup>

---

<sup>55</sup> Jakub, Fišer. EU and Czech Countermeasures against Disinformation. 9 Sept. 2020, [dspace.cuni.cz/handle/20.500.11956/120762?show=full](https://dspace.cuni.cz/handle/20.500.11956/120762?show=full).

<sup>56</sup> "Questions and Answers about the East StratCom Task Force | EEAS Website." [www.eeas.europa.eu](http://www.eeas.europa.eu), [www.eeas.europa.eu/eeas/questions-and-answers-about-east-stratcom-task-force\\_en#11253](http://www.eeas.europa.eu/eeas/questions-and-answers-about-east-stratcom-task-force_en#11253). Accessed 13 June 2022.

<sup>57</sup> "Establishment." Hybrid CoE - the European Center of Excellence for Countering Hybrid Threats, [www.hybridcoe.fi/establishment/](http://www.hybridcoe.fi/establishment/). Accessed 13 June 2022.

<sup>58</sup> Jankowicz, Nina. "Avoiding the Band-Aid Effect in Institutional Responses to Disinformation and Hybrid Threats." GMFUS, 12 Aug. 2019, [www.gmfus.org/news/avoiding-band-aid-effect-institutional-responses-disinformation-and-hybrid-threats](http://www.gmfus.org/news/avoiding-band-aid-effect-institutional-responses-disinformation-and-hybrid-threats). Accessed 13 June 2022.

<sup>59</sup> Policy Shift Overview: How the Czech Republic Became One of the European Leaders in Countering Russian Disinformation. Kremlin Watch Team, 5 Oct. 2017.

Alongside expanding such initiatives at the institutional level, the Czech Republic has also made it a point to bring the topic of disinformation to the forefront of the EU's political discourse. On May 13, 2022, Czech Deputy Minister of Defense Jan Havranek pledged that the Czech EU Council Presidency would prioritize addressing hybrid threats— especially that of disinformation— once its rotation of the EU Council Presidency begins this upcoming July.<sup>60</sup>

Similarly, the United States has also proactively sought to support and facilitate greater anti-disinformation efforts within NATO. To illustrate, it was one of nine nations responsible for establishing the aforementioned Hybrid COE after signing the Memorandum of Understanding with Finland, Sweden, the United Kingdom, Latvia, Lithuania, Poland, France, and Germany on April 11, 2017.<sup>61</sup> Additionally, the U.S. Mission to NATO (USNATO) has announced research funding opportunities for non-governmental organizations, non-profit organizations, and think tanks to financially support projects focusing on countering disinformation and misinformation. With funding coming from the U.S. Department of State, this appears to be at least one avenue that the U.S. government has taken to better acquaint itself with civil society organizations, as well as rising researchers in this field, that are relentlessly studying this threat.<sup>62</sup> In summation, from creating multilateral centers that prioritize studying disinformation, sending their best and brightest minds to serve as researchers at these entities, and providing funding opportunities to researchers in a fashion that reinforces state-level understanding of this threat, it is clear that both the U.S. and Czech governments have been proactive in bolstering and instituting further counter-disinformation initiatives within the international organizations they belong to as member states.

Second, both the Czech and U.S. governments have demonstrated a willingness to either directly or indirectly deploy punitive measures against entities and/or individuals believed to be engaging in online disinformation efforts. For instance, in March of 2018, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) slapped strict economic sanctions on

---

<sup>60</sup> Pollet, Mathieu. "Czech EU Presidency to Prioritise Fight against Hybrid Threats, Deputy Minister Says."

[www.euractiv.com](http://www.euractiv.com), 13 May 2022, [www.euractiv.com/section/global-europe/news/czech-eu-presidency-to-prioritise-fight-against-hybrid-threats-minister-says/](http://www.euractiv.com/section/global-europe/news/czech-eu-presidency-to-prioritise-fight-against-hybrid-threats-minister-says/). Accessed 13 June 2022.

<sup>61</sup> "Establishment." Hybrid CoE - the European Center of Excellence for Countering Hybrid Threats, [www.hybridcoe.fi/establishment/](http://www.hybridcoe.fi/establishment/). Accessed 13 June 2022.

<sup>62</sup> "U.S. Mission to NATO -- Countering Disinformation and Misinformation | Research Funding."

[Researchfunding.duke.edu](http://Researchfunding.duke.edu), [researchfunding.duke.edu/us-mission-nato-countering-disinformation-and-misinformation](http://researchfunding.duke.edu/us-mission-nato-countering-disinformation-and-misinformation). Accessed 13 June 2022.

five entities and nineteen individuals as punishment for conducting or aiding corrosive cyber-activities, ranging from direct cyberattacks on critical infrastructure to spreading disinformation during the 2016 U.S. Presidential Election. As of that year, 100 individuals and entities were believed to be punished with such measures.<sup>63</sup> Similar action was taken by the OFAC in April 2021 when sixteen entities and sixteen individuals— including disinformation news outlets such as InfoRos, SouthFront, NewsFront, and the Strategic Culture Foundation— were struck with further economic sanctions for attempting to influence the 2020 U.S. Presidential Elections.<sup>64</sup> These outlets and more— including Odná Rodman, Rhythm of Eurasia, Journal Kamerton, New Eastern Outlook, Geopolitica, Oriental Review, and United World International— were once again hit with economic sanctions by the U.S. Department of the Treasury’s OFAC as recently as March 2022 for their efforts in amplifying harmful disinformation narratives about the war in Ukraine.<sup>65</sup> Outside of purely economic punishments, the U.S. Department of Justice (DOJ) has taken matters into its own hands to even deny access of certain disinformation outlets to the internet. Under the powers authorized to it by the Foreign Agent Registration Act and the International Emergency Economic Powers Act, the DOJ has in the past “seized” Iranian internet domains shown to have targeted Americans with disinformation in order to influence public opinion.<sup>66</sup>

Although no evidence was found during the course of this research that showed the Czech government had penalized disinformation outlets operating in its internet domain via economic sanctions, it has taken similar measures in regards to indirectly barring certain websites from being accessible. According to Radio Prague International, on February 26, 2022, the Czech Internet Association CZ.NIC, the entity that manages internet domain with the national suffix .cz, blocked citizens from accessing eight websites on the recommendation of the Czech government and intelligence agencies for promulgating disinformation about Russia’s

---

<sup>63</sup> “Treasury Sanctions Russian Cyber Actors for Interference with the 2016 U.S. Elections and Malicious Cyber-Attacks | U.S. Department of the Treasury.” 15 Mar. 2018. [home.treasury.gov/news/press-releases/sm0312](https://home.treasury.gov/news/press-releases/sm0312).

<sup>64</sup> “Treasury Escalates Sanctions against the Russian Government’s Attempts to Influence U.S. Elections.” U.S. Department of the Treasury, 15 Apr. 2021, [home.treasury.gov/news/press-releases/jy0126](https://home.treasury.gov/news/press-releases/jy0126).

<sup>65</sup> Kern, Rebecca. “Treasury Sanctions Russian Online Outlets for Spreading Disinformation.” POLITICO, 3 Mar. 2022, [www.politico.com/news/2022/03/03/treasury-sanctions-russia-online-outlets-00013931](https://www.politico.com/news/2022/03/03/treasury-sanctions-russia-online-outlets-00013931).

<sup>66</sup> “Countering Disinformation in the United States.” [www.solarium.gov](https://www.solarium.gov), U.S. Cyberspace Solarium Commission, Dec. 2021, [www.solarium.gov/public-communications/disinformation-white-paper](https://www.solarium.gov/public-communications/disinformation-white-paper). Accessed 13 June 2022.

invasion of Ukraine.<sup>67</sup> So, while the government itself did not single-handedly censor websites participating in the country's disinformation ecosystem and once again left it to another external entity to make the final call on banning domains, it did facilitate this action through its consultation with the CZ.NIC. Regardless, compared to the declaration that the Czech President's office would cease all formal communication with five online outlets suspected of propagating disinformation in 2021, the CZ.NIC's decision demonstrates a newfound, stronger stance on prohibiting alternative news outlets from operating at their fullest capacity on the internet.<sup>68</sup> Overall, whether through financial sanctions, the seizure of domains, or the outright blocking of internet access to certain websites, agencies within the Czech and U.S. governments have demonstrated a similar willingness to take punitive measures against actors within their respective disinformation ecosystems since 2015.

### ***Conclusion***

While the Disinformation Governance Board examined at the beginning of this research could be viewed by many as an unadulterated failure in the larger U.S. federal effort to curb disinformation, it alternatively could be remembered as a useful, sobering moment for the disinformation research community spread across the United States and its allies. The flurry of viral conspiracy theories and barrage of public suspicion it received from American society at large demonstrates not only the difficulty federal governments face in trying to assemble anything that may be seen as a "one-size-fits-all" solution to combat this threat but a desperate need for policymakers and researchers engaging in the fight against disinformation to better communicate these policies, as well as the reasoning behind these policies, to the citizens they serve. This sentiment applies to every country defending itself from foreign, state-orchestrated disinformation campaigns— especially the United States and the Czech Republic.

However, questions still loom within the minds of many citizens when they hear that an entity hopes to "counter disinformation." How does one determine what is disinformation and

---

<sup>67</sup> Lazarová, Daniela. "Czech Domain Operator Blocks Eight Websites Spreading Disinformation and Kremlin Propaganda." Radio Prague International, 26 Feb. 2022, [english.radio.cz/czech-domain-operator-blocks-eight-websites-spreading-disinformation-and-kremlin-8743164](https://english.radio.cz/czech-domain-operator-blocks-eight-websites-spreading-disinformation-and-kremlin-8743164). Accessed 13 June 2022.

<sup>68</sup> "Czech President's Office Bans Communications with 5 Outlets for Alleged "Misinformation." Committee to Protect Journalists, 21 June 2021, [cpj.org/2021/06/czech-presidents-office-bans-communications-with-5-outlets-for-alleged-misinformation/](https://cpj.org/2021/06/czech-presidents-office-bans-communications-with-5-outlets-for-alleged-misinformation/). Accessed 13 June 2022.

what is not? What is the process for debunking said disinformation? What anti-disinformation policies are most effective and which are not? In order for the policymakers of tomorrow to better articulate answers to these pressing questions, they must first be exposed to the historical lay-of-the-land when it comes to *who* has enacted *which* policies and *when* throughout this ever-evolving fight. This research aspired to provide just that: a comprehensive, easily-digestible overview comparing the characteristics of two of the most prominently targeted nations' state-level responses to disinformation since 2015 in a fashion that incorporates the policies they have implemented as well.

After conducting extensive research, four differences were identified in the characteristics Czech and U.S. governments' state-level response to disinformation since the mid-2010s. First, the Czech government had a considerable head start in countering disinformation earlier, as it acknowledged the threat within its public-facing strategic security documents much sooner than the United States. Second, the U.S. government has had a far more decentralized approach to creating federal centers, initiatives, and task forces across an array of government agencies authorized to counter disinformation than the Czech Republic. Third, the U.S. Congress appears to have a greater desire to tackle disinformation through legislation than the Czech Parliament does. Finally, considerably more engagement with technological companies— especially social media platforms— has been witnessed on the side of the U.S. government when addressing disinformation compared to the Czech government. However, this analysis is not void of similarities. These can be discerned in both states' tendency to support, and in some cases even expand, counter-disinformation efforts in the international organizations they participate as member states within as well as a growing willingness to punish disinformation actors via financial or denial of service means.

With the solid foundation of policy precedents and characteristics examined within this research, the next generation of disinformation researchers from the Czech Republic and United States— one day armed with the theoretical means of determining the effectiveness of anti-disinformation policies— will hopefully utilize these findings to smoothly frame the basis of their own future studies when attempting to discern which policies, or which way of executing them, showcase greater success in countering disinformation. In doing so, more constructive and versatile state-level anti-disinformation policies can be implemented to ensure the integrity of our democracies and the cohesiveness of our societies in the years to come.

### *Works Cited*

- Barr, Luke. 2022. "DHS Plays Defense over Disinformation Governance Board." ABC News. May 5, 2022.  
<https://abcnews.go.com/Politics/dhs-plays-defense-disinformation-governance-board/story?id=84520182>.
- Biden, Joseph. 2021. "INTERIM NATIONAL SECURITY STRATEGIC GUIDANCE." The White House. <https://www.whitehouse.gov/wp-content/uploads/2021/03/NSC-1v2.pdf>.
- "Centre against Terrorism and Hybrid Threats - Terorismus a Měkké Cile." n.d. Wwww.mvcr.cz. <https://www.mvcr.cz/cthh/clanek/centre-against-terrorism-and-hybrid-threats.aspx>.
- Cohen, Raphael S., Nathan Beauchamp-Mustafaga, Joe Cheravitch, Alyssa Demus, Scott W. Harold, Jeffrey W. Hornung, Jenny Jun, Michael Schwille, Elina Treyger, and Nathan Vest. 2021. "Combating Foreign Disinformation on Social Media: Study Overview and Conclusions." Wwww.rand.org. July 19, 2021.  
[https://www.rand.org/pubs/research\\_reports/RR4373z1.html](https://www.rand.org/pubs/research_reports/RR4373z1.html).
- Colborne, Michael. 2017. "The Brief Life, and Looming Death, of Europe's 'SWAT Team for Truth.'" Foreign Policy. September 20, 2017.  
<https://foreignpolicy.com/2017/09/20/the-brief-life-and-looming-death-of-europes-swat-team-for-truth-fake-news/>.
- Conger, Kate. 2021. "Big Tech C.E.O.s Face Lawmakers on Disinformation." *The New York Times*, March 25, 2021, sec. Business.  
<https://www.nytimes.com/live/2021/03/25/business/social-media-disinformation>.
- "Countering Disinformation in the United States." 2021. Wwww.solarium.gov. U.S. Cyberspace Solarium Commission. December 2021.  
<https://www.solarium.gov/public-communications/disinformation-white-paper>.
- "Czech President's Office Bans Communications with 5 Outlets for Alleged 'Misinformation.'" 2021. Committee to Protect Journalists. June 21, 2021.  
<https://cpj.org/2021/06/czech-presidents-office-bans-communications-with-5-outlets-for-alleged-misinformation/>.

- “Establishment.” n.d. Hybrid CoE - the European Center of Excellence for Countering Hybrid Threats. Accessed June 13, 2022. <https://www.hybridcoe.fi/establishment/>.
- “European Union Reaches Agreement on Digital Services Act.” 2022. JD Supra. May 6, 2022. <https://www.jdsupra.com/legalnews/european-union-reaches-agreement-on-5835854/>.
- Filipec, Ondrej. 2019. “Building an Information Resilient Society: An Organic Approach.” *Cosmopolitan Civil Societies: An Interdisciplinary Journal* 11 (1): 1–26. <https://doi.org/10.5130/ccs.v11.i1.6065>.
- “Global Engagement Center.” n.d. United States Department of State. <https://www.state.gov/bureaus-offices/under-secretary-for-public-diplomacy-and-public-affairs/global-engagement-center/>.
- Hutt, David. 2021. “How the Czech Right Is Fighting Back against ‘Cancel Culture.’” Euronews. May 11, 2021. <https://www.euronews.com/2021/05/11/how-the-right-wing-is-fighting-back-against-cancel-culture-in-the-czech-republic>.
- Jakub, Fišer. 2020. “EU and Czech Countermeasures against Disinformation,” September. <https://dspace.cuni.cz/handle/20.500.11956/120762?show=full>.
- Jankowicz, Nina. 2019. “Avoiding the Band-Aid Effect in Institutional Responses to Disinformation and Hybrid Threats.” GMFUS. August 12, 2019. <https://www.gmfus.org/news/avoiding-band-aid-effect-institutional-responses-disinformation-and-hybrid-threats>.
- . 2021. *HOW to LOSE the INFORMATION WAR : Russia, Fake News, and the Future of Conflict*. S.L.: I B Tauris.
- “Jiří Šedivý - Groupe d’Études Géopolitiques.” n.d. <https://Geopolitique.eu/>. Accessed June 13, 2022. <https://geopolitique.eu/en/authors/jiri-sedivy/>.
- Kern, Rebecca. 2022. “Treasury Sanctions Russian Online Outlets for Spreading Disinformation.” POLITICO. March 3, 2022. <https://www.politico.com/news/2022/03/03/treasury-sanctions-russia-online-outlets-00013931>.
- Keyser, Carl. 2020. “CISA: What Is It and What Does It Do?” Wwww.security7.net. December 9, 2020. <https://www.security7.net/news/cisa-what-is-it-and-what-does-it-do>.



- Krejčí, Markéta. 2017. “The Ins and Outs of the Czech Disinformation Community.” *New Eastern Europe*. November 8, 2017.  
<https://neweasterneurope.eu/2017/11/08/ins-outs-czech-disinformation-community/>.
- Lazarová, Daniela. 2022. “Czech Domain Operator Blocks Eight Websites Spreading Disinformation and Kremlin Propaganda.” *Radio Prague International*. February 26, 2022.  
<https://english.radio.cz/czech-domain-operator-blocks-eight-websites-spreading-disinformation-and-kremlin-8743164>.
- Lorenz, Taylor. 2022. “How the Biden Administration Let Right-Wing Attacks Derail Its Disinformation Efforts.” *Washington Post*, May 18, 2022.  
<https://www.washingtonpost.com/technology/2022/05/18/disinformation-board-dhs-nina-jankowicz/>.
- “MDM | CISA.” n.d. *Www.cisa.gov*. Accessed June 13, 2022.  
<https://www.cisa.gov/mdm#:~:text=The%20MDM%20team%20serves%20as>.
- Mitchell, Amy, and Mason Walker. 2021. “More Americans Now Say Government Should Take Steps to Restrict False Information Online than in 2018.” *Pew Research Center*. August 18, 2021.  
<https://www.pewresearch.org/fact-tank/2021/08/18/more-americans-now-say-government-should-take-steps-to-restrict-false-information-online-than-in-2018/>.
- Myers, Steven Lee. 2022. “A Panel to Combat Disinformation Becomes a Victim of It.” *The New York Times*, May 18, 2022, sec. Technology.  
<https://www.nytimes.com/2022/05/18/technology/disinformation-governance-board.html>.
- “National Security Audit.” 2015. *Mvcr.cz*. 2015.  
<https://www.mvcr.cz/cthh/soubor/national-security-audit.aspx>.
- “National Security Strategy [December 2017].” 2017. *Hsdl.org*.  
<https://doi.org/https://www.hsdl.org/?view&did=806478>.
- “New Government Media Advisor: ‘Disinformation Isn’t Covered by Freedom of Speech.’” 2022. *Radio Prague International*. March 28, 2022.  
<https://english.radio.cz/new-government-media-advisor-disinformation-isnt-covered-free-dom-speech-8746083>.

- “Policy Shift Overview: How the Czech Republic Became One of the European Leaders in Countering Russian Disinformation.” 2017. European Values Center: Kremlin Watch Team.
- Pollet, Mathieu. 2022. “Czech EU Presidency to Prioritise Fight against Hybrid Threats, Deputy Minister Says.” *Www.euractiv.com*. May 13, 2022.  
<https://www.euractiv.com/section/global-europe/news/czech-eu-presidency-to-prioritise-fight-against-hybrid-threats-minister-says/>.
- Presse, AFP-Agence France. 2022. “Baltics, Poland Urge Social Media Giants to Curb ‘Russian Disinformation.’” *Www.barrons.com*. February 28, 2022.  
<https://www.barrons.com/news/baltics-poland-urge-social-media-giants-to-curb-russian-disinformation-01646062508>.
- “Protected Voices.” n.d. Federal Bureau of Investigation.  
<https://www.fbi.gov/investigate/counterintelligence/foreign-influence/protected-voices>.
- “Questions and Answers about the East StratCom Task Force | EEAS Website.” n.d.  
*Www.eeas.europa.eu*. Accessed June 13, 2022.  
[https://www.eeas.europa.eu/eeas/questions-and-answers-about-east-stratcom-task-force\\_en#11253](https://www.eeas.europa.eu/eeas/questions-and-answers-about-east-stratcom-task-force_en#11253).
- Reuters*. 2017. “Czech ‘Hybrid Threats’ Center under Fire from Country’s Own President,” January 4, 2017, sec. Media and Telecoms.  
<https://www.reuters.com/article/us-czech-security-hybrid/czech-hybrid-threats-center-under-fire-from-countrys-own-president-idUSKBN14O227>.
- Schultheis, Emily. 2017. “The Czech Republic’s Fake News Problem.” *The Atlantic*. October 21, 2017.  
<https://www.theatlantic.com/international/archive/2017/10/fake-news-in-the-czech-republic/543591/>.
- “Special Envoys | Ministry of Foreign Affairs of the Czech Republic.” 2022. *Www.mzv.cz*. April 26, 2022.  
[https://www.mzv.cz/jnp/en/about\\_the\\_ministry/organization\\_of\\_the\\_ministry/special\\_envoys\\_1/index.html](https://www.mzv.cz/jnp/en/about_the_ministry/organization_of_the_ministry/special_envoys_1/index.html).
- “Statement by Secretary Johnson on the Designation of Election Infrastructure as a Critical Infrastructure Subsector.” 2017. Department of Homeland Security. January 6, 2017.

<https://www.dhs.gov/news/2017/01/06/statement-secretary-johnson-designation-election-infrastructure-critical>.

“The Defense Strategy of the Czech Republic.” 2017. Ministry of Defense of the Czech Republic.

“The FBI Launches a Combating Foreign Influence Webpage — FBI.” 2018. Wwww.fbi.gov. August 20, 2018.

<https://www.fbi.gov/news/press-releases/press-releases/the-fbi-launches-a-combating-for-eign-influence-webpage>.

“Treasury Escalates Sanctions against the Russian Government’s Attempts to Influence U.S. Elections.” 2021. U.S. Department of the Treasury. April 15, 2021.

<https://home.treasury.gov/news/press-releases/jy0126>.

“Treasury Sanctions Russian Cyber Actors for Interference with the 2016 U.S. Elections and Malicious Cyber-Attacks | U.S. Department of the Treasury.” n.d. Home.treasury.gov.

<https://home.treasury.gov/news/press-releases/sm0312>.

“U.S. Mission to NATO -- Countering Disinformation and Misinformation | Research Funding.” n.d. Research Funding.duke.edu. Accessed June 13, 2022.

<https://researchfunding.duke.edu/us-mission-nato-countering-disinformation-and-misinformation>.

“Warner Urges CEOs of Major Tech Companies to Take Actions to Curb Russian Information Operations.” 2022. Mark R. Warner. February 25, 2022.

<https://www.warner.senate.gov/public/index.cfm/2022/2/warner-urges-ceos-of-major-tech-companies-to-take-actions-to-curb-russian-information-operations>.