

**BEFORE THE FEDERAL TRADE COMMISSION
WASHINGTON, D.C.**

**IN THE MATTER OF
THE BRITISH BROADCASTING CORPORATION (“BBC”); BBC GLOBAL
NEWS LTD.; BBC STUDIOS LTD.; BBC.COM; BBC WORLD NEWS; AND
RELATED BBC-AFFILIATED COMMERCIAL ENTITIES,**

Respondents.

**SUPPLEMENTAL COMPLAINT ALLEGING DECEPTIVE ACTS AND
PRACTICES AND REQUEST FOR INVESTIGATION
Under Section 5 of the Federal Trade Commission Act**

*Material Misrepresentations Regarding Impartiality, Independence, Trustworthiness,
Historical Reliability, and Editorial Verification in the Commercial Marketing,
Distribution, Licensing, and Monetization of BBC News Products in the United States*

COMPLAINANT: ISRAEL MEDIA MONITOR LLC

**Supplement to Report No: 20626555124 and underlying Online Report No:
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I. INTRODUCTION

This Complaint asks the Commission to act under Section 5 of the Federal Trade Commission Act against the British Broadcasting Corporation and its affiliated commercial entities (collectively, the “BBC” or “Respondents”) for deceptive acts and practices in the commercial marketing, licensing, distribution, and monetization of BBC-branded news products in the United States.

The BBC is a public broadcaster and also a major commercial digital media enterprise. Through BBC Studios, BBC Global News, BBC.com, subscription services, streaming platforms, advertising, licensing, branded content, and digital distribution, it sells news products worldwide. The United States is one of its most important markets: when the BBC launched its U.S. subscription service, it reported that its digital news platform reaches approximately 139 million users worldwide, including nearly 60 million in the United States. BBC Studios reported record commercial revenues in its most recent financial year.

The BBC sells these products on the strength of five claimed attributes: impartiality, independence, trustworthiness, historical reliability, and superior editorial verification. These are commercial representations. They attract consumers, subscribers, advertisers, distributors, and licensing partners, and they distinguish BBC products from those of competing news organizations. Consumers who buy BBC news buy a product represented to possess those attributes, and the representations raise the commercial value of BBC subscriptions, advertising inventory, licensing arrangements, distribution agreements, and digital platforms. When the representations are materially misleading, the injury falls on consumers, who pay for and rely on a product materially different from the one represented, and on the competing news organizations that lose business to it.¹

The BBC’s commercial representations create a materially misleading net impression with respect to its reporting on Israel, Jews, and antisemitism. The evidence shows a recurring pattern: reliance on unverified or partisan sources; omission of material context; amplification of serious allegations before verification; and materially inconsistent reporting across the BBC’s English, Arabic, and Persian services. Most recently, the BBC has repeatedly left misleading impressions uncorrected after contradictory evidence emerged in its reporting on Hamas in Gaza, Hezbollah in Lebanon, and the wars of the United States and Israel with Iran. These are recurring institutional failures, and they bear directly on the BBC’s marketed claims of impartiality, independence, trustworthiness, and superior verification.

The BBC has profited from these representations while withholding information that reasonable consumers would consider material, including documented internal editorial concerns, findings by Ofcom (the United Kingdom’s broadcasting regulator), and the BBC’s own public corrections. The most significant misleading impressions arise from three sources: the materially different editorial practices of the BBC’s Arabic and Persian (Farsi) services; the BBC’s governance and funding relationship with the United Kingdom government; and the BBC’s state-linked commercial partnerships and arrangements with Qatar, Saudi Arabia, and Iran.

These concerns span decades and multiple conflicts. Historical scholarship, BBC archival materials, internal memoranda, regulatory findings, parliamentary scrutiny, independent quantitative analyses, and the BBC's own corrections individually and collectively document recurring problems of terminology, contextual omission, editorial consistency, verification, and unequal treatment of comparable events across BBC platforms.

Consumers, advertisers, educational institutions, digital platforms, policymakers, and other media organizations in the United States routinely rely on BBC reporting. Materially misleading representations about the nature, quality, independence, and reliability of BBC news products therefore influence purchasing decisions, distort competition in the market for news and information, and affect millions of U.S. consumers.

Complainant requests that the Commission investigate whether these representations, omissions, and practices constitute unfair or deceptive acts or practices under Section 5, and enter an order restraining the BBC from making claims of impartiality in marketing and other materials accessible to U.S. consumers and businesses.

II. EXECUTIVE SUMMARY

Respondents violate Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, by marketing BBC-branded news products in the United States as impartial, independent, and trustworthy while their own broadcasts, their own internal findings, and an official finding of Ofcom, the United Kingdom's broadcasting regulator, establish that the product delivered differs from the product sold. The proof consists of Respondents' own broadcast language, their own commercial contracts, and a formal Ofcom determination that Respondents do not dispute.

A. Commercial Product

The BBC is a global commercial media enterprise. It sells U.S. consumers a paid subscription product, sells advertising and sponsorship inventory to U.S. and international brands, and licenses BBC-branded content to U.S. distributors, all on the express strength of its claimed impartiality, independence, and editorial trustworthiness. Respondents use those claims to differentiate and price a product sold in the United States. Section 5 reaches that conduct: it prohibits deceptive acts or practices in or affecting commerce, including foreign commerce that causes reasonably foreseeable injury in the United States, and claims made to sell a product are commercial speech. 15 U.S.C. § 45(a)(1), (a)(4)(A); *Bolger v. Youngs Drug Products Corp.*, 463 U.S. 60, 66–68 (1983). (See Sections III and X.A.)

B. BBC Arabic Adopts Hezbollah's Own Language

BBC Arabic has repeatedly described Hezbollah, a designated terrorist organization under both United States and United Kingdom law, as "the Islamic resistance," Hezbollah's own preferred self-description. Respondents corrected this terminology after earlier complaints and therefore knew of the problem. During the March 2026 Hezbollah-Iran conflict, BBC Arabic used it again. Repetition after correction reflects an editorial

policy of adopting Hezbollah’s terminology, and a deliberate gap between the neutral news product Respondents market and the product they deliver. A seller that keeps making a claim after notice that its product does not conform engages in a continuing deceptive practice, judged by the net impression the claim conveys. *Kraft, Inc. v. FTC*, 970 F.2d 311, 314 (7th Cir. 1992); *FTC v. Amy Travel Service, Inc.*, 875 F.2d 564, 573–74 (7th Cir. 1989). (See Sections VII through IX, including Section IX.D, and Exhibit I.)

C. Amplifying Iran’s Wartime Casualty Propaganda

During active hostilities involving American, Israeli, and Iranian forces, Respondents’ BBC Monitoring service disseminated a claim by Iran’s Islamic Revolutionary Guard Corps (“IRGC”) that Iranian attacks had killed or wounded 560 American soldiers. Confirmed U.S. military casualty figures were dramatically lower. Respondents attributed the claim to the IRGC, yet still transmitted an extraordinary, unverified casualty claim from the military of a state then at war with the United States. (See Sections VII through IX and Exhibit I.)

Respondents used the BBC’s global distribution and trusted brand to amplify a wartime claim portraying Iranian operations as inflicting massive American casualties. Casualty claims are a recognized propaganda tool that shapes public perception of a war’s success, cost, and direction. Carried by a news organization marketed as independent, impartial, accurate, and trusted, such claims reach audiences, and gain credibility, that Iranian military channels would not otherwise command. American subscribers paying for that marketed impartiality would reasonably consider it important that their news provider amplified an Iranian claim about American service members sharply at odds with confirmed U.S. reporting. The context sharpens the point: the BBC has obtained reporting access inside Iran, and the British Parliament has heard evidence that Iran conditioned that access on the resulting material not being used by BBC Persian. Broadcasting Iranian war propaganda to U.S. consumers of BBC news services is commercial deception.

Under Section 5 of the FTC Act, **proof of an intent to deceive is not required**. The governing inquiry is whether, from the perspective of a consumer acting reasonably under the circumstances, the representation or omission is likely to mislead and is material. *FTC Policy Statement on Deception*, appended to *Cliffdale Associates, Inc.*, 103 F.T.C. 110, 174–84 (1984).

D. Paid Commercial Relationships With Qatar, Saudi Arabia, and Turkey, and Access Conditions Set by Iran

Respondents’ commercial divisions have produced paid promotional content for state and state-linked entities in Qatar and Saudi Arabia, including branded tourism campaigns for Visit Qatar and promotional films for Saudi Arabia’s Public Investment Fund (“PIF”), the sovereign wealth fund chaired by Crown Prince Mohammed bin Salman. BBC StoryWorks ran a comparable destination campaign, “Colours of Türkiye,” labeled “#Ad paid and presented by GoTürkiye,” the brand of Turkey’s state tourism agency. (See Section IV.A.) Meanwhile, Respondents’ news division reports on these same

governments' governance, human-rights records, and roles in regional conflicts. Human Rights Watch's Saudi Arabia researcher has characterized PIF's investment and content-commissioning strategy as a tool of "soft-power influence" used to "whitewash Saudi government abuses" and "garner uncritical foreign support" for the Crown Prince's agenda.

Respondents' own commercial materials describe this content as building on the BBC's "century-long pedigree" as "the world's most trusted storytellers." Respondents thus sell the same reputation for trust they market to U.S. consumers to state and state-linked entities whose conduct BBC journalism is expected to cover independently. Because the BBC's trusted name is itself part of what these entities buy, the arrangement is an inherent conflict of interest and creates a materially misleading impression. (See Section VIII and Exhibit D.)

Each of these governments except Saudi Arabia supports Hamas. Iran has been a U.S.-designated State Sponsor of Terrorism since 1984; the State Department calls it the leading state sponsor of terrorism and reports that it provides up to \$100 million a year to Palestinian terrorist groups, including Hamas. Qatar has hosted Hamas's political leadership in Doha since 2012 and for years sent monthly payments into Gaza that the Hamas-run government used to pay public-sector salaries; the Treasury Department has sanctioned a Qatar-based Hamas financial facilitator with close ties to the Iranian regime. Turkey's President has called Hamas "a liberation group" and has repeatedly hosted Hamas leaders whom the United States designates as Specially Designated Global Terrorists, and the Treasury Department has sanctioned Hamas's investment network, financial officials, charities, and a money exchange operating in Turkey.

Respondents accept payment from Qatar and Turkey, the hosts and financiers of Hamas, and from Saudi Arabia's sovereign wealth fund, and they depend on Iran for reporting access. A news organization paid by the financiers and hosts of one party to a war, and dependent for access on that party's principal state sponsor, has a material conflict of interest in covering that war. Federal law requires disclosure of a connection between a content source and a paying party whenever it would affect the weight consumers give the content, and the Commission has found it deceptive to present compensated content as objective without disclosing the compensation. 16 C.F.R. § 255.5; *In re Shop Tutors, Inc. (LendEDU)* (2020); *In re Machinima, Inc.* (2016). Respondents market BBC news to U.S. consumers as impartial without that disclosure, and BBC coverage of that war is where this Complaint documents recurring departures from Respondents' represented standards.

The Commission has authority to investigate these relationships. Section 6 of the FTC Act empowers it to gather information and require special reports from entities engaged in commerce, and Section 20 authorizes civil investigative demands in investigations of deceptive practices. 15 U.S.C. §§ 46(a)–(b), 57b-1. The Commission should use that authority, as it did in examining the undisclosed compensation behind LendEDU's "objective" rankings, to determine the full extent of Respondents' financial, commercial, and access relationships with the governments of Qatar, Saudi Arabia, Turkey, and Iran and their state-linked entities, and whether those ties have shaped BBC coverage of

Hamas, Hezbollah, Israel, and the conflicts in Gaza and Lebanon. (See Sections IV.A and VIII, Exhibit D, and notes 11–11a.)

E. An Official Regulatory Finding of Material Editorial Failure

Ofcom, Britain’s statutory broadcasting regulator, found that a BBC documentary breached the UK Broadcasting Code because viewers were not told that its child narrator was the son of a Hamas-government official. Ofcom determined that this relationship was material information viewers needed to assess the narrator’s contribution, and that withholding it made the program materially misleading. The finding followed a formal investigation and is an objective determination by the authority charged by law with enforcing British broadcasting standards.

That finding bears directly on Respondents’ representations of impartiality, accuracy, transparency, and trustworthiness. The documentary traded on the credibility of the BBC brand while withholding its principal narrator’s relationship to the Hamas government whose conflict it portrayed. Ofcom’s finding is objective regulatory evidence that the product delivered under the BBC name departed materially from the standards Respondents sell as its defining attributes. The BBC’s own 2025/26 Annual Report acknowledges the documentary’s breach of the BBC’s Editorial Guidelines, and on October 1, 2026, a House of Commons select committee reviewing the BBC’s Royal Charter listed it among recent failures in BBC editorial standards. Together with the Prescott memorandum, the Asserson Report, and the BBC’s own correction record, the Ofcom finding gives the Commission an independent and established basis to investigate. Courts weigh a respondent’s prior violations in assessing the likelihood of recurrence and the scope of relief. *United States v. W.T. Grant Co.*, 345 U.S. 629, 633 (1953); *Telebrands Corp. v. FTC*, 457 F.3d 354, 358–62 (4th Cir. 2006). (See Section IX, including Section IX.D.)

F. A Documented and Continuing Pattern of Commercial Deception

The evidence establishes a documented, continuing pattern of commercial deception in BBC reporting on conflicts involving Israel, sustained over many years:

- Three separate reviews, one commissioned by the BBC, one by an independent legal team, and one by the BBC’s own editorial adviser, examined BBC Middle East coverage; each time, the BBC responded with resistance or inaction. The BBC commissioned Malcolm Balen in 2003 to review the quality and impartiality of that coverage, considered his report at its Journalism Board in November 2004, and then spent approximately £333,000 in legal costs, all the way to the UK Supreme Court, resisting its disclosure. The Asserson Report, an independent empirical audit released in September 2024, found “a deeply worrying pattern of bias and multiple breaches by the BBC of its own editorial guidelines,” concluding that the BBC repeatedly downplayed Hamas terrorism while presenting Israel as aggressive and militaristic. Michael Prescott, a former independent adviser to the BBC’s Editorial Guidelines and Standards Committee, reported that an internal review of BBC Arabic concluded: “It is hard to conclude

anything other than that BBC Arabic’s story treatment was designed to minimise Israeli suffering and paint Israel as the aggressor,” and that serious editorial concerns had repeatedly reached senior management without corrective action.

- Following public disclosure of Prescott’s memorandum in November 2025, BBC Director-General Tim Davie and BBC News Chief Executive Deborah Turness resigned. The editorial practices documented by Prescott and in this Complaint continued after their departures.
- Even after these problems were publicly documented, Respondents continued to depart from the BBC’s own standards: BBC Monitoring amplified the IRGC’s wartime claim that Iranian attacks had killed or wounded 560 American soldiers, giving Iranian propaganda an international platform; BBC Arabic again used Hezbollah’s own “Islamic Resistance” terminology after earlier complaints and corrections had required its removal; Respondents’ commercial divisions accepted payment for promotional work for state and state-linked entities in Qatar and Saudi Arabia whose conduct BBC News covers; and Ofcom found that Respondents withheld material information from viewers of a Gaza documentary.

The pattern extends beyond Israel-related coverage. A sociologist and a former career BBC broadcaster, writing independently and on unrelated subjects, each concluded that the BBC’s institutional culture diverges from its claimed neutrality, corroborating that the pattern alleged here is institutional. (See Exhibit H.)

The law weighs these breaches cumulatively. Courts treat repeated violations across products, media, and time as a pattern that bears on liability and justifies broad relief. *Telebrands Corp. v. FTC*, 457 F.3d 354, 358–62 (4th Cir. 2006); *Sears, Roebuck & Co. v. FTC*, 676 F.2d 385, 391–92 (9th Cir. 1982); *Kraft, Inc. v. FTC*, 970 F.2d 311, 326–27 (7th Cir. 1992). (See Exhibit G, Section VI.)

G. This Is Commercial Deception Under Section 5

The documented divergence between the BBC’s commercial representations of trust and the product it delivers presents a straightforward claim of commercial deception under Section 5.

Respondents sell a news product on the strength of claimed impartiality and independence, and the product delivered repeatedly fails to conform to those represented characteristics. (See Sections VI, VII, and IX and Exhibits A, F, G, and I.)

The framing is simple: a seller who markets an information product as objective and independent must deliver an objective and independent product. The Commission has enforced that principle against review sites, publishers, and advertisers alike:

- *In re Shop Tutors, Inc. (LendEDU)* (2020): deceptive to represent financial-product rankings as “objective,” “accurate,” and “unbiased” when compensation in fact influenced them.

- *In re Inside Publications, LLC* (2018): deceptive for a magazine publisher to run paid content “disguised as features or other articles” and to represent paid advertising as “the independent statements and opinions of impartial publications.” The order bars the publisher from “misrepresenting that paid commercial advertising is a statement of opinion from an independent or objective publisher or source.”
- *In re Lord & Taylor, LLC* (2016): deceptive to present a paid article in an online fashion magazine as independent editorial content without disclosing the commercial relationship.
- *In re Legacy Learning Systems, Inc.* (2011), *In re Machinima, Inc.* (2016), and *In re Warner Bros. Home Entertainment Inc.* (2016): deceptive to present paid reviews and sponsored videos as independent opinion.

Courts apply the same net-impression test even to literally true claims. *FTC v. Colgate-Palmolive Co.*, 380 U.S. 374, 386–92 (1965); *FTC v. Cyberspace.com LLC*, 453 F.3d 1196, 1200 (9th Cir. 2006).

Respondents market impartiality, independence, accuracy, and trust as defining attributes of every BBC news product sold and monetized in the United States, while accepting payment from states and state-linked actors their news division covers. The same principle governs. (See Sections III and VI.)

H. False Commercial Marketing Claims Are Not Protected by the First Amendment

Deceptive commercial claims may be prohibited, and disclosures reasonably designed to prevent consumer deception may be required. *Zauderer v. Office of Disciplinary Counsel*, 471 U.S. 626, 638, 651 (1985). “For commercial speech to come within [the First Amendment], it at least must concern lawful activity and not be misleading.” *Central Hudson Gas & Electric Corp. v. Public Service Commission*, 447 U.S. 557, 566 (1980).

The First Amendment fully protects BBC journalism and editorial expression. Section 5 reaches a different object: the commercial claims Respondents use to market and sell that journalism as impartial, independent, accurate, and trusted. The Commission draws that line consistently. In *POM Wonderful*, the Commission found the challenged advertisements entitled to no First Amendment protection because they were “deceptive and misleading,” and the D.C. Circuit affirmed: “The FTC Act proscribes—and the First Amendment does not protect—deceptive and misleading advertisements.” *POM Wonderful, LLC v. FTC*, 777 F.3d 478, 484, 499 (D.C. Cir. 2015). Respondents’ commercial representations are therefore subject to Section 5. (See Section X.)

I. Investigation, Cease-and-Desist Order, and Other Relief

Complainant requests that the Commission investigate Respondents’ representations of impartiality, independence, accuracy, and trustworthiness under Section 5, consistent with *LendEDU* and *Inside Publications*, and issue a cease-and-desist order under Section 5(b), 15 U.S.C. § 45(b), requiring Respondents to remove those representations from all marketing and other materials directed to U.S. consumers and businesses, with civil penalties under Section 5(l), 15 U.S.C. § 45(l), if Respondents fail to comply.

Complainant also asks the Commission to investigate Respondents' undisclosed relationships with Qatar, Saudi Arabia, Turkey, and Iran, to require corrective disclosure, and to exercise its investigative authority under Section 6. The matter is urgent. During active hostilities with the United States, Respondents carried Iran's wartime propaganda about American casualties to U.S. audiences under the BBC brand, and BBC reporting shows apparent support for Iran and its proxy Hezbollah, a designated terrorist organization (see Section VIII.C). That conduct calls for prompt regulatory intervention. (See Section XII.)

III. COMMERCIAL NATURE OF RESPONDENTS' U.S. OPERATIONS AND FTC JURISDICTION

The Commission has jurisdiction because Respondents engage in substantial commercial activity affecting consumers throughout the United States. Although the BBC receives public funding in the United Kingdom, Respondents operate a major commercial media enterprise that markets, distributes, licenses, advertises, and monetizes BBC-branded news in the United States through BBC.com, mobile applications, podcasts, streaming platforms, BBC World News, BBC America, BritBox, syndication agreements, YouTube channels, and other digital channels. These activities generate revenue from subscriptions, advertising, licensing, sponsorships, branded content, and content distribution.²

In June 2025, the BBC introduced paid subscriptions for U.S. users of BBC.com, creating a direct paid relationship with American news consumers. Reuters reported that BBC.com reaches approximately 139 million users worldwide, including nearly 60 million in the United States, and that U.S. subscribers pay \$49.99 a year or \$8.99 a month for unlimited access to BBC news articles, features, and a 24-hour livestream. The Guardian reported that the package includes BBC News content, live television, documentaries, films, podcasts, newsletters, and other premium digital services.³

BBC Studios, Respondents' principal commercial subsidiary, reported record commercial revenues of approximately £2.1 billion for 2024–2025, driven in part by BritBox International and consumer products.⁴ Respondents also reach U.S. consumers through BritBox International, BBC America, BBC.com, mobile applications, podcasts, licensing arrangements, and content-sharing agreements with U.S. media organizations, including CBS News.⁵

On October 1, 2026, the House of Commons Digital, Culture, Media and Sport Committee, reporting on the review of the BBC's Royal Charter, confirmed the structure through which Respondents commercialize the BBC brand. The Charter permits commercial activities only where they fit the BBC's mission and public purposes, are not funded by licence-fee income, and aim to generate profit. BBC Studios, the largest part of BBC Commercial, manages and licenses BBC brands globally, and BBC Commercial's revenues reached £2.15 billion in 2024–2025, returning an average of £125 million a year in dividends to fund BBC public-service content. Because the BBC's mission and first Public Purpose require impartial news (see Section V), the Charter itself ties Respondents' commercial exploitation of the BBC brand, including in the United States, to the very quality whose misrepresentation is at issue here, and the profits of that

exploitation fund the BBC's public-service output, including BBC News. The Committee also recommended raising BBC Commercial's borrowing limit so that BBC Studios can invest and grow, exploring an international licence through which audiences outside the United Kingdom would pay for BBC content, and pursuing revenue from BBC YouTube content overseas. Commercial distribution of BBC content to U.S. consumers is therefore set to expand.^{5a}

BBC Studios' own materials confirm the scale. BBC Studios Digital Brands states that it "curate[s], commission[s] and commercialise[s]" BBC-linked digital intellectual property through more than 90 channels across YouTube, Facebook, TikTok, Instagram, Snapchat, and other platforms. In June 2026, BBC Studios appointed Lindsay Turner as Vice President, Digital Growth and Strategy, to lead its advertising proposition and commercial partnerships, describing bespoke advertising and branded-content packages for advertisers, and reported that the United States accounts for 33% of watch time and 54% of revenue for BBC Studios Digital Brands.⁶

The appointment of former Google EMEA President Matt Brittin as Director-General reflects the BBC's strategic emphasis on digital distribution and audience growth; contemporary reporting placed his appointment in the context of the BBC's digital transformation, funding, reputation, and reform challenges.⁷

Respondents therefore operate subscription, advertising, licensing, branded-content, distribution, and partnership businesses competing for U.S. consumers, advertising revenue, distribution relationships, audience attention, and brand trust. **The challenged representations of impartiality, independence, accuracy, and trustworthiness concern qualities of a product sold, licensed, promoted, and monetized in the United States, and they establish the U.S. commercial nexus for Commission investigation under Section 5.**

The Commission has applied Section 5 to comparable representations of objectivity, independence, trust, and undisclosed commercial influence: in *LendEDU*, rankings represented as "objective," "accurate," and "unbiased" while compensation affected them; in *TRUSTe*, representations concerning trust and certification; in *Lord & Taylor*, advertising presented as independent editorial content without disclosure of commercial influence; and in *Inside Publications*, a magazine publisher's representation that paid advertising reflected the independent opinions of an impartial publication. Objectivity, independence, trust, and transparency are material commercial representations subject to Section 5.⁸

Respondents' representations create a materially misleading net impression because the product delivered departs materially from the product represented. The Complaint documents:

- materially inconsistent reporting across BBC Arabic, Persian, and English-language services;
- reliance upon unverified or partisan sources;
- omission of material contextual information;

- amplification of serious allegations before adequate verification;
- omission of information material to Respondents' marketed claims of impartiality and independence; and
- continuation of misleading impressions after contrary evidence, complaints, and corrections.

If established, these practices constitute deceptive acts or practices under Section 5 of the Federal Trade Commission Act.⁹

Section 5 reaches Respondents as foreign entities. The Undertaking Spam, Spyware, And Fraud Enforcement With Enforcers beyond Borders Act of 2006 confirmed that Section 5's prohibition of unfair or deceptive acts or practices "in or affecting commerce" extends to foreign-commerce conduct that causes or is likely to cause reasonably foreseeable injury within the United States, or that involves material conduct occurring within the United States. 15 U.S.C. § 45(a)(4)(A). Respondents satisfy both tests independently: they make the challenged representations directly to U.S. consumers through U.S.-facing platforms and a U.S. subscription product, and the injury, consumers paying for a product materially different from the one represented, occurs in the United States wherever Respondents make their editorial decisions.

IV. PARTIES

A. Complainant

Israel Media Monitor LLC ("Complainant" or "IMM") is a United States organization established to promote accuracy, transparency, accountability, consumer choice, and fair competition in the commercial marketplace for news and information concerning Israel and the United States-Israel relationship.

IMM's interests are economic and consumer-protection based. Its mission includes identifying and exposing deceptive commercial media practices that damage Israel's economic standing and United States-Israel business, investment, technological, and cultural relationships. That economic relationship spans trade, investment, and innovation in cybersecurity, defense technology, medical technology, artificial intelligence, semiconductors, water technology, agriculture, and energy infrastructure. The United States-Israel Free Trade Agreement, in force since 1985, was the first U.S. free-trade agreement and remains a foundation of bilateral trade and investment; U.S. goods trade with Israel totaled approximately \$34.4 billion in 2025.¹⁰

Commercially distributed misinformation about Israel affects consumer purchasing, investor confidence, corporate reputation, business partnerships, tourism, technology adoption, market access, and U.S. companies' decisions about engaging with Israel. These effects are measurable through consumer boycotts, investment and divestment decisions, disrupted commercial relationships, reputational harm, reduced market access, and the amplification of narratives designed to isolate Israel economically.

Foreign governments, state-supported media, terrorist organizations, affiliated political and financial networks, and organized boycott campaigns use information operations,

media narratives, and economic pressure to weaken Israel's international standing and commercial relationships. These actors include Iran and the IRGC; Iran-backed Hezbollah; Hamas and its political, financial, and operational networks in Iran, Qatar, Turkey, and elsewhere; and boycott, divestment, and sanctions campaigns. U.S. authorities have designated Hezbollah and Hamas as foreign terrorist organizations and have documented Iranian support for both, together with Hamas financial facilitators and investment networks operating through Turkey and Qatar.¹¹

Respondents hold direct commercial relationships with several of these same states. They are addressed here because identifying undisclosed conflicts of this kind is central to IMM's consumer-protection mission.

Qatar. BBC StoryWorks produced "Discover Culture in Qatar" content labeled "#Ad paid and presented by Visit Qatar"; BBC Studios supplies inflight entertainment to state-owned Qatar Airways; and Amnesty International criticized the BBC's "uncritical" Qatar videos ahead of the 2022 World Cup (see Section VIII.B).

Saudi Arabia. BBC StoryWorks produced paid promotional films for Saudi Arabia's Public Investment Fund, the sovereign wealth fund chaired by Crown Prince Mohammed bin Salman, while BBC News reports on the Saudi government (see Section VIII.A). That paid relationship is itself a conflict of interest.

Turkey. BBC StoryWorks ran the "Colours of Türkiye" campaign, labeled "#Ad paid and presented by GoTürkiye," the brand of the Türkiye Tourism Promotion and Development Agency, which operates under Turkey's Ministry of Culture and Tourism; according to a published case study, the studio "set out to redefine Türkiye's brand identity for a global audience" (see Section VIII.D).

Iran. Respondents' access to report from inside Iran carries an acknowledged editorial price. After the National Union of Journalists reported in 2022 that BBC management had accepted Iranian government-imposed reporting restrictions in exchange for access, a BBC World Service spokesperson confirmed that the BBC "accepted some limitations on this occasion in order to provide our audiences with rare insights from inside the country" (see Section VIII.C). Respondents are paid to promote the images of governments whose conduct BBC News covers, and depend on another such government for access, while marketing the same news product to U.S. consumers as independent of outside influence.^{11a}

BBC Arabic, BBC Persian, and other BBC services amplify these actors' terminology and narratives under a brand built on nearly a century of institutional credibility, while the BBC holds itself out as both independent of government and trustworthy as a national institution. Section 5 applies because Respondents commercialize that brand, selling subscriptions, advertising, and licenses on the strength of claimed impartiality, and they must meet the same standard as any seller of "objective" or "unbiased" information. The resulting economic injury is direct: weakened investor confidence in Israel, disrupted commercial relationships, boycotts and divestment, harm to Israel-linked businesses, and impairment of the trade relationship described above. IMM exists to identify and act on exactly this harm.

Respondents operate a U.S. digital marketing and subscription business, and they make their representations of impartiality and trust directly to U.S. consumers through the channels those consumers actually use:

- A paid subscription product sold directly to United States consumers through BBC.com, at \$8.99 monthly or \$49.99 annually, marketed on the strength of the same impartiality and trust claims challenged in this Complaint (Section III);
- Advertising and sponsorship inventory sold to United States and international brands through BBC Studios' commercial media kit, which markets BBC audiences on the basis of their trust in BBC-branded content (Sections IX.A and X.A);
- Licensing and syndication arrangements with United States distributors and platforms, monetizing the same BBC brand (Section III); and
- Direct public representations of institutional trustworthiness addressed specifically to American audiences: in written evidence to the UK Parliament, the BBC itself represented that it is “the number one most trusted news brand in the UK, the US and the rest of the world” — a representation naming the United States market by name, not a general statement of editorial philosophy. (BBC, Written Evidence (FON0059), House of Lords Communications and Digital Committee inquiry, *The Future of News: Impartiality, Trust, and Technology*, committees.parliament.uk/writtenevidence/128502/html/.)

This is the theory the Commission applied in *LendEDU*: a claim of “objective,” “accurate,” and “unbiased” information, made directly to consumers deciding whether to rely on the product, is a material commercial representation subject to Section 5, whatever the underlying subject matter. Sections V and VI develop the point.

IMM is a proper complainant because the conduct alleged directly concerns the economic and consumer-protection interests it was established to protect, and Respondents are subject to Commission jurisdiction because they market and monetize BBC-branded news in the United States through express claims of impartiality, independence, accuracy, trustworthiness, and verification. The Commission accepts reports of fraud, scams, and bad business practices from consumers, businesses, organizations, and advocates, and uses them to identify patterns, investigate misconduct, bring enforcement actions, and alert the public. IMM submits this Complaint on that basis, on behalf of the U.S. consumers, advertisers, distributors, businesses, investors, and United States-Israel commercial relationships these practices affect. IMM was formed to address a gap in regulatory oversight: when a public broadcaster becomes a commercial operator in the U.S. market, its home regulator oversees its broadcasting, while its U.S. commercial claims fall to the Commission. IMM brings that gap, and other egregious commercial misinformation akin to trade libel, to the Commission's attention.¹²

B. Respondents

The British Broadcasting Corporation (“BBC”), BBC Commercial Limited, BBC Studios Limited, BBC Studios Americas, Inc., BBC Global News Limited, BBC Global News US

LLC, BBC News USA Inc., and their related subsidiaries and affiliated entities involved in the United States-facing marketing, publication, advertising, licensing, distribution, subscription, streaming, syndication, and monetization of BBC-branded news and media products are referred to collectively in this Complaint as “Respondents” or the “BBC.”¹³

The BBC is the public-service corporation operating under Royal Charter. It owns the BBC brand and is the source of the challenged representations of impartiality, independence, trustworthiness, accuracy, and editorial standards. It conducts commercial activities through BBC Commercial Limited and its subsidiaries; its Annual Reports identify BBC Studios as the principal commercial arm of the BBC Group, with operations spanning content production, streaming, channels, digital products, licensing, and direct-to-consumer services.¹⁴

BBC Studios Limited and its related companies conduct the BBC’s principal international commercial activities, including BBC Global News, international BBC-branded channels, streaming, advertising, licensing, distribution, and commercial activity involving BBC.com. BBC Studios maintains U.S. operations through BBC Studios Americas, Inc., headquartered in New York, and other U.S. entities.¹⁵

BBC Global News Limited is a commercial subsidiary within BBC Studios’ news operations. Current BBC Group disclosures list BBC Global News Limited, BBC Global News Holdings Limited, BBC Global News US LLC, and BBC News USA Inc. within the Group. BBC Studios states that it is responsible for the global commercial operations of BBC News and sells advertisers and partners access to BBC audiences through advertising, sponsorship, branded content, and distribution.¹⁶

BBC.com and the BBC app are the principal international platforms through which Respondents distribute and monetize BBC News. The BBC Group reports that they serve international audiences seeking what the BBC markets as “trusted, impartial BBC news”; that registrations, global audiences, and digital revenues have grown; and that the BBC News channel is streamed through BBC.com in the United States. The BBC sells advertising, sponsorship, and branded content across its websites, apps, television services, and off-platform distribution.¹⁷

BritBox International, a subscription streaming service wholly owned by BBC Studios since it acquired ITV’s remaining interest in March 2024, competes in the U.S. streaming market. It is included to the extent Respondents use the BBC brand, its reputation, or the challenged representations to market, license, or monetize BritBox in the United States.¹⁸

BBC America is owned by AMC Networks; BBC Studios sold its remaining 50.1% interest in November 2024. BBC America continues to use the BBC name under a BBC Studios brand-licensing agreement and to distribute BBC Studios programming under a separate content-licensing agreement, and is identified here as a U.S. licensee and distributor of the BBC brand and BBC Studios content.¹⁹

C. Respondents’ Commercial Roles

The BBC is the parent institution, owner and licensor of the BBC brand, and source of the challenged representations.

BBC Commercial Limited, BBC Studios Limited, BBC Studios Americas, Inc., BBC Global News Limited, BBC Global News US LLC, BBC News USA Inc., and related entities perform complementary roles in producing, publishing, advertising, licensing, distributing, streaming, syndicating, and monetizing BBC-branded content in the United States. The BBC Group treats these activities as one integrated commercial operation and reports revenue from content sales, channels, streaming, subscriptions, advertising, consumer products, licensing, and digital platforms.²⁰

BBC Studios runs the global commercial operations of BBC News, including BBC.com, BBC apps, BBC News distribution, advertising, content licensing, subscriptions, and relationships with U.S. distributors and platforms.²¹

BBC.com, the BBC app, the BBC News television service, syndication partners, residential distributors, airlines, hotels, digital platforms, advertisers, and branded-content partners together form the network through which BBC News reaches, and generates commercial value from, U.S. audiences.²²

Each Respondent is properly included because the challenged representations belong to an integrated BBC brand and commercial strategy that spans every article, broadcast, language service, and editorial unit. Representations of impartiality, independence, trustworthiness, accuracy, and superior verification enhance the value of BBC-branded products and support audience acquisition, subscriptions, advertising, sponsorship, licensing, distribution, syndication, streaming, branded content, and partnerships in the United States.

The precise entity responsible for each representation, item of content, transaction, or distribution practice is information principally within Respondents' possession. This Complaint identifies the entities whose public filings and commercial materials establish their participation in the BBC Group's U.S.-facing operations and asks the Commission to determine their respective roles through investigation.

V. RESPONDENTS' COMMERCIAL REPRESENTATIONS OF IMPARTIALITY, INDEPENDENCE, TRUSTWORTHINESS, AND VERIFICATION

Respondents market BBC-branded news to U.S. consumers, subscribers, advertisers, distributors, licensing partners, and digital platforms as impartial, independent, trustworthy, accurate, reliable, and subject to superior editorial and verification standards. These representations describe defined attributes of the product and are central to how Respondents distinguish and monetize it in the United States.

The BBC's Royal Charter defines its mission as serving audiences through "impartial, high-quality and distinctive output and services." Its first Public Purpose requires duly accurate and impartial news, current-affairs, and factual programming meeting the highest editorial standards. Ofcom's Broadcasting Code likewise requires news to be reported with due accuracy and presented with due impartiality, and significant mistakes to be acknowledged and corrected promptly.²³

The BBC's Editorial Guidelines give these representations detailed content, identifying trust as the foundation of the BBC and committing it to independence, impartiality, honesty, and the highest standards of due accuracy. The Guidelines prescribe requirements for source evaluation, verification, attribution, material omissions, terminology, controversial subjects, breadth of viewpoint, due weight, and the distinction between fact and opinion.²⁴

These governing documents are themselves part of Respondents' U.S. marketing. The Royal Charter and the Editorial Guidelines are published online, are freely available to U.S. consumers, and govern the BBC News content sold to U.S. subscribers through BBC.com. Respondents invoke them to substantiate the "trusted, impartial BBC news" they sell, and the BBC's 2025/26 Annual Report promotes BBC journalism under the banner "Pursue truth with no agenda. Independent, fearless and fair," calling its commitment to impartial, accurate, and trusted news "our promise to the UK and audiences worldwide." The Charter and Guidelines thus lend the BBC's commercial activities the authority of a public-law commitment: a U.S. subscriber or advertiser who checks the BBC's claims finds a constitutional mandate of impartiality and a detailed code promising it. Respondents' commercial operations borrow that authority, which makes the gap between those documents and the delivered product a material misrepresentation in its own right.^{24a}

Respondents' independence claim must also be measured against the BBC's relationship with the British state. BBC overseas broadcasting expanded during the Second World War as part of Britain's wartime information system, and for decades the Foreign Office funded the BBC World Service and helped set its languages, objectives, priorities, targets, openings, and closures.²⁵ After principal funding moved to the licence fee in 2014, the BBC continued to set World Service objectives, priorities, and targets with the Foreign Secretary, and senior BBC and Foreign Office officials continued to consult regularly on World Service performance.²⁶ Today the World Service is funded by the licence fee and by Foreign, Commonwealth and Development Office ("FCDO") grants of approximately £137 million in 2025–2026; in return, the BBC may not close an entire language service without the Foreign Secretary's agreement and must agree, and report against, annual objectives, priorities, and targets. In March 2026, the House of Commons Committee of Public Accounts called the World Service a "core instrument of UK soft power."²⁷ (See Exhibit E, §§ II–IV, documenting BBC governance, funding, and independence.)

The BBC describes itself the same way. BBC leadership told the same Committee that the World Service is a vital instrument of UK soft power, describing it as a "unique and precious UK strategic asset," and urged that the United Kingdom double its spending on the World Service to match state-backed rivals. The BBC's 2025/26 Annual Report states that the BBC is "carrying the UK's voice, values, and influence" to 502 million people a week, calls the World Service "a critical piece of national security infrastructure," and proposes expanding BBC news worldwide "as part of a new era for UK security, trade and influence." The Charter's fifth Public Purpose directs the BBC "[t]o reflect the United Kingdom, its culture and values to the world," and the BBC's current Chairman has called the BBC "one of our strongest calling cards on soft power." The Committee

itself compared the World Service with the U.S. Agency for Global Media, a U.S. federal agency, and measured its standing against Chinese and Russian state broadcasters.^{27a}

An organization that its government funds, directs on objectives, and describes as an instrument of national influence, and that describes itself the same way, is an agent of state policy. Respondents may not market that organization to U.S. consumers as independent of government without disclosing the relationship. In structure, the BBC's relationship with the British state matches the relationships this Complaint documents with Qatar, Saudi Arabia, and Iran: in each, a state with an interest in the BBC's output holds financial or access leverage over it, and Respondents' U.S. marketing claims independence while omitting the relationship. (See Sections VII and VIII.D.)

The Asserson Report applies the BBC's own standards to current output. Published in 2024 by international lawyer Trevor Asserson and a multidisciplinary research team, the Report analyzed more than 9 million words of BBC English- and Arabic-language output on the Israel-Hamas war and identified approximately 1,553 alleged breaches of BBC editorial guidelines relating to accuracy, impartiality, terminology, and contextual framing.²⁸ Monitoring organizations, including CAMERA and CAMERA UK, have independently and repeatedly documented BBC Arabic reports that required correction or clarification after publication.

The Balen Report and the Prescott materials (see Exhibit F), discussed in Sections VII and IX, show that the BBC's own internal governance repeatedly identified concerns of the kind documented here, and Ofcom's October 17, 2025 determination that the documentary *Gaza: How to Survive a Warzone* materially misled viewers formally confirms a departure from Respondents' represented standards.²⁹

Respondents' representations of impartiality, independence, accuracy, trustworthiness, and superior verification are affirmative claims concerning defined attributes of the BBC-branded product. An advertiser making an objective claim expressly or by implication represents that it possesses a reasonable basis supporting the claim; a representation, omission, or practice is deceptive when it is likely to mislead consumers acting reasonably under the circumstances and is material to consumer choice or conduct.³⁰

VI. MATERIALLY MISLEADING NET IMPRESSION AND MATERIAL OMISSIONS

Respondents create a materially misleading net impression by marketing BBC-branded news products as impartial, independent, trustworthy, accurate, fair, reliable, historically credible, and superior in verification while omitting information that materially qualifies or contradicts those representations. Section 5 evaluates the complete impression conveyed to reasonable consumers, including the interaction between affirmative claims, implied claims, omissions, presentation, and surrounding circumstances.³¹

The FTC's *LendEDU* decision provides a close analogy. LendEDU represented that its financial-product rankings were "objective," "accurate," and "unbiased," while the FTC alleged that compensation in fact influenced those supposedly independent rankings; the Commission treated "objective" and "unbiased" as affirmative, material representations concerning the methodology, independence, and reliability of an information product on

which consumers were expected to rely.³² The same principle applies to the BBC: historical government influence, current government funding and strategic coordination, undisclosed source affiliations, materially different practices among language services, adoption of interested-party terminology, inadequate verification, and recurring failures to comply with the BBC's own standards directly qualify the independence and reliability of the represented methodology.

The Commission applies Section 5 to media content as well as to comparison and ranking products. In *In re Inside Publications, LLC*, the FTC alleged that a magazine publisher violated Section 5 by running paid advertisements “disguised as features or other articles of interest to its readers,” and by falsely representing that paid advertising reflected “the independent statements and opinions of impartial publications.” The resulting consent order prohibits the publisher from “misrepresenting that paid commercial advertising is a statement of opinion from an independent or objective publisher or source.”^{32a} The theory applies with greater force here. The publisher in *Inside Publications* disguised individual paid placements as editorial content; Respondents market the entirety of BBC-branded news, across every platform and language service, as impartial and independent while accepting compensation from states and state-linked actors whose conduct that news covers.

The *TRUSTe* and *Made in USA Brand* matters supply a second close analogy: in each, the FTC alleged that a represented assurance of independent verification or certification was deceptive because the actual monitoring or compliance process did not support the assurance conveyed to consumers.³³ The BBC's impartiality representation performs the same commercial function as a trust or certification mark — Respondents publish a detailed standard, place the authority of the BBC brand behind it, and use that assurance to obtain commercial value, while the evidence throughout this Complaint demonstrates repeated departures from that standard.

The evidence of BBC news distortion is extensive and cumulative: historical and governmental records showing that BBC international broadcasting was developed by, and remained subject to, British wartime-information and foreign-policy structures; the BBC's commissioning and continued suppression of the Balen Report; the Asserson Report's identification of more than 1,500 alleged breaches of BBC standards; the Prescott materials on BBC Arabic and internal editorial oversight; Ofcom's formal finding on the Gaza documentary; and the BBC corrections and apologies collected throughout this Complaint.³⁴ The most recent conflicts in Gaza and Lebanon show the same pattern: premature or inadequately qualified reporting from Hamas-controlled Gaza; reliance on interested or partisan sources; ideological terminology such as “the resistance”; failure to identify Hamas and Hezbollah as designated terrorist organizations; materially different treatment by BBC English, BBC Arabic, and BBC Persian; and amplification of Iranian claims and narratives (see Sections VII through IX).³⁵

Accordingly, the Commission should investigate whether Respondents' affirmative representations, material omissions, and actual practices create a materially misleading net impression in violation of Section 5 of the Federal Trade Commission Act.³⁶

VII. COMMERCIAL USE OF THE BBC'S REPUTATION FOR IMPARTIALITY, INDEPENDENCE, AND ACCURACY

Respondents market BBC-branded news to U.S. consumers, subscribers, advertisers, distributors, licensees, and partners as the product of an institution distinguished by longstanding impartiality, editorial independence, accuracy, and trustworthiness, and they use that accumulated reputation to generate subscriptions, advertising revenue, licensing value, streaming audiences, and distribution access in the United States.³⁷

That representation is a claim about both present quality and historical method: that BBC journalism has consistently applied impartial, independent, and reliable editorial standards. The net impression is deceptive because Respondents offer that reputation as substantiation for the commercial product while omitting material evidence that governmental influence, political objectives, institutional self-protection, antisemitic assumptions, selective source treatment, and recurring editorial distortions shaped the news reporting the BBC represents as impartial and independent.³⁸

The BBC established impartiality and independence as its defining qualities almost 100 years ago. Its 1927 Royal Charter structure presented the broadcaster as editorially independent of political control, and John Reith, the BBC's founding General Manager and first Director-General, promoted impartiality, objectivity, institutional authority, and public service as the defining principles of broadcasting. The BBC has repeated those representations ever since, first as a public broadcaster and now in the marketing materials Respondents use to distinguish and monetize BBC-branded products.³⁹

The historical record shows that those representations were inaccurate from the start. During the 1926 General Strike, the BBC restricted access by opposition, labor, and conciliatory voices following government objections, while Reith privately recognized that the Government trusted the BBC to avoid genuine impartiality. Representing impartiality while privately accommodating the state authority that grants or restricts broadcasting access is therefore a practice as old as the BBC's independence claim itself, and it continues today.

During the Second World War, BBC overseas broadcasting operated within British wartime-information, propaganda, psychological-warfare, and foreign-policy structures. Academic scholarship and archival evidence further show that governmental priorities and antisemitic attitudes affected the selection, prominence, framing, and dissemination of information concerning the extermination of European Jews.⁴⁰

Section VIII.D documents the same pattern today, with Qatari, Saudi, and Iranian relationships now occupying the place held by the Foreign Office in 1926 and during the war years. The news organization that historians, and Respondents themselves, describe as an instrument of British soft power now serves, in substantially the same manner, the reputational and narrative interests of those actors as well. And as shown in Section V, the BBC still presents itself as "carrying the UK's voice, values, and influence" to the world. That self-description is irreconcilable with the claim that the BBC is independent, impartial, and free from political influence.

Section 5 reaches the BBC's continued commercial use of its impartiality claim. As *Inside Publications* confirms (see Sections III and VI), the Commission's jurisdiction extends to a publisher's representations of editorial independence.

From the General Strike through present commercial operations and contemporary international reporting, the BBC's reputation for impartiality grew while the quality and methodology of its news departed from impartiality. Respondents now present that reputation as proof of an enduring tradition of impartiality, independence, accuracy, and trustworthiness. The historical record refutes that claim: government influence, prescribed wartime functions, suppression or restricted dissemination of material news, and identity-based editorial judgments are part of the same institutional history.

FTC precedent supports evaluating this evidence as a cumulative course of conduct. In *FTC v. Gill*, the Ninth Circuit considered the systematic nature, frequency, continuation, and repeated dissemination of deceptive representations and affirmed relief where "giving Defendants another chance might prove to be unwise." *United States v. W.T. Grant Co.* directs consideration of "the character of the past violations" in determining whether the record establishes "some cognizable danger of recurrent violation, something more than the mere possibility."⁴¹

FTC v. Grant Connect, LLC links repeated conduct to a continuing institutional practice. The Ninth Circuit there reviewed the practices of defendant Kyle Kimoto, which had "drawn FTC scrutiny for over a decade" across several nominally different schemes sharing "several unifying features," and largely upheld liability and broad injunctive relief against him. *FTC v. Stefanchik* likewise confirms that deception may arise from a representation, omission, or practice and may be established through the overall "net impression" of an extensive body of marketing evidence.⁴²

Here, the record shows the same institutional qualities represented, and the same departures repeated, across successive generations, services, technologies, and geopolitical settings. That pattern supports the inference that the current commercial net impression reflects an enduring institutional methodology.

Section 5 applies to the present commercial use of that reputation. The historical evidence supplies the measure against which the representation must be tested, and subscriptions, advertising, licensing, distribution, and streaming supply the commercial nexus. Each subsection below identifies a distinct application of the same deception: Respondents invoke the BBC's accumulated reputation as proof of impartiality and independence while the historical and modern record documents recurring material departures from those qualities.

A. Deceptive Commercial Use of the BBC's Wartime Reputation to Misrepresent Its Impartiality and Conceal Longstanding Bias

Respondents use the BBC's wartime reputation to represent impartiality, independence, accuracy, and trustworthiness as longstanding, defining qualities of BBC news, giving audiences, subscribers, advertisers, distributors, licensees, and partners a reason to select and rely on the product. The evidence compiled in Exhibit B directly qualifies that claim.⁴³

Stephen Ward, writing in *The Independent*, reported the results of archival research conducted for the BBC Radio 4 documentary series *Document*, drawing on BBC archives, government papers at the Public Record Office, and interviews with surviving participants. His title states the finding: “Why the BBC Ignored the Holocaust: Anti-Semitism in the Top Ranks of Broadcasting and Foreign Office Staff Led to the News Being Suppressed.” Ward reported that antisemitic attitudes among senior broadcasting and government officials contributed to suppressing and minimizing news of the Nazi extermination of European Jews.⁴⁴

Professor James Jordan of the University of Southampton’s Parkes Institute for the Study of Jewish/non-Jewish Relations studies how the BBC has reported, depicted, and remembered the Holocaust across news, current affairs, radio, and television. He found that “The BBC knew more than they broadcasted,” and that concerns about believability, British antisemitism, and BBC credibility each played a role in restricting what domestic audiences learned about atrocities against Jews.⁴⁵

Professor Tony Kushner, the James Parkes Professor of History at Southampton and former director of the Parkes Institute, is a leading scholar of antisemitism, refugee history, and British institutional responses to Jewish persecution. His work documents the persistence of antisemitic assumptions in wartime British society and official institutions, and shows how the BBC treated Jewish persecution as a generalized humanitarian tragedy, absorbing the destruction of European Jewry into accounts of civilians, refugees, occupied peoples, or victims of Nazism. That substitution altered the substance of the news by obscuring the specifically anti-Jewish purpose, and the principal victims, of the extermination campaign.⁴⁶

Together, these historians identify an editorial process shaped by the Jewish identity of the victims. Antisemitic assumptions influenced whose evidence was credited, which facts received prominence, how victims were identified, and what reached the audience. Ward identified suppression rooted in antisemitism in senior broadcasting and Foreign Office circles; Jordan identified British antisemitism as a factor restricting information about atrocities against Jews; and Kushner documented the institutional generalization of specifically Jewish persecution.

The International Holocaust Remembrance Alliance’s working definition, an accepted framework, defines antisemitism as “a certain perception of Jews, which may be expressed as hatred toward Jews.” In the record summarized in Exhibit B, that perception appears as skepticism toward evidence of Jewish victims, reluctance to emphasize specifically Jewish persecution, concern that accurate reporting would portray the war as fought on behalf of Jews, and replacement of Jewish identity with generalized descriptions.⁴⁷

The BBC’s own Editorial Guidelines supply the measure. They place impartiality at the heart of the BBC’s public service, requiring fair treatment of significant evidence, appropriate breadth of perspective, and consistent editorial judgment, and they require accurate reporting that reflects the material character of events without misleading audiences through omission or presentation. Measured against those standards, the record compiled in Exhibit B documents departures from each quality now attributed to the

BBC's wartime reputation: antisemitic assumptions compromised impartiality; governmental and foreign-policy influence compromised independence; and suppression, restricted dissemination, and generalized descriptions compromised accuracy by obscuring who was selected for extermination and why.

The commercial deception lies in the gap between the history represented and the history documented. Respondents present the BBC's wartime legacy as proof of an established impartial and independent methodology and withhold the documented record of identity-based skepticism, suppressed or restricted news, reduced prominence, generalized identification of Jewish victims, and governmental influence. A materially misleading net impression may arise from affirmative claims, implied representations, omissions, and the arrangement or prominence of information. Respondents use the BBC's accumulated reputation to generate audience reliance, subscriptions, advertising value, licensing, streaming revenue, and distribution access, and the evidence in Exhibit B goes directly to whether that reputation substantiates the impartiality, independence, accuracy, and trustworthiness used to sell BBC news.⁴⁸

B. Commercial Deception Through Omission of Jewish Identity and Dissemination of Iranian and Proxy Framing

Respondents market BBC-branded news as historically authoritative, accurate, impartial, independent, and resistant to propaganda, and U.S. consumers pay for it directly through the BBC.com subscriptions described in Section III. Respondents' recurring editorial choices depart from that standard in the direction their commercial relationships would predict. Four related practices, set out below, illustrate the departure, and each is reinforced by the undisclosed Qatari and Saudi commercial relationships documented in Sections VIII.A and VIII.B and by the Iranian access arrangements documented in Section VIII.C.

(i) Omission of Jewish Identity on Holocaust Memorial Day

During BBC broadcasts marking Holocaust Memorial Day in January 2026, presenters referred to the "six million people" murdered by the Nazi regime without identifying them as the six million Jews murdered in the Holocaust. Referring to six million unspecified "people" converted the extermination of six million Jews into generalized mass suffering and obscured the antisemitic purpose of the crime, in programming devoted to commemorating that very crime. The BBC acknowledged the error and apologized.⁴⁹

The literal truth that six million people were murdered leaves the misleading impression intact. In *FTC v. Cyberspace.com LLC*, the Ninth Circuit held that truthful language may still deceive when its net impression misleads reasonable consumers, and that information is material when it is likely to affect consumer choice or conduct. Jewish identity was essential both to the history being reported and to the historical authority Respondents commercially attribute to BBC content.⁵⁰

The incident repeats the historical pattern documented in Section VII.A. Ward, Jordan, and Kushner found that wartime BBC reporting restricted information about atrocities against Jews and absorbed Jewish persecution into broader accounts of civilian suffering.

The January 2026 wording produced the same result: Jewish identity again disappeared from the account of an anti-Jewish crime.⁵¹

(ii) Transmission of Iranian and Proxy Framing

That continuity is especially material because Iran uses Holocaust denial and distortion as state propaganda.^{51a} BBC reporting that strips the Jewish identity from Holocaust victims mirrors the narratives of a regime that denies and distorts the Holocaust.

BBC Arabic and Persian reporting has also repeated Iranian and proxy language and claims without adequate editorial distance. BBC Arabic described Iranian-backed Hezbollah as “the Islamic resistance” after Hezbollah attacks on Israel, adopting Hezbollah’s ideological self-description, and repeated it during the March 2026 Hezbollah-Iran conflict, years after the same terminology had required correction. (See Exhibit I, compiling this dated, multi-year record.) BBC Persian and BBC Monitoring also disseminated Iranian state and IRGC claims, including the IRGC assertion that Iranian strikes had killed or wounded “560 American soldiers,” despite far lower confirmed casualty figures. Sections VIII.C and IX and the supporting exhibits document these incidents in detail.⁵²

The pattern is direct. BBC wartime and Holocaust reporting generalized Jewish victimhood; its 2026 Holocaust Memorial Day coverage again removed the Jewish identity of the six million; and its Arabic and Persian services carried Iranian and Hezbollah terminology and claims without adequate editorial separation. Together, these practices reveal a BBC editorial system that weakens Jewish historical identity while transmitting the narratives of a regime and proxy network that promote Holocaust denial and antisemitic propaganda. That record directly contradicts Respondents’ representations of historical authority, editorial independence, impartiality, rigorous verification, and resistance to propaganda, which concern the quality and methodology of the product offered to consumers and commercial partners.

(iii) Recurrence in Other BBC Holocaust Content

The same pattern appears in other BBC Holocaust content. A December 2025 episode of *The Repair Shop* about a Kindertransport child omitted the Jewish identity of the children the Kindertransport rescued; the BBC apologized after criticism. BBC promotional material for the 2023 film *One Life* initially described the children rescued by Sir Nicholas Winton without identifying them as predominantly Jewish. Each omission removed both the identity of the victims and the antisemitic basis of their persecution.⁵³

(iv) Ofcom’s Finding on Coverage of an Antisemitic Attack

Ofcom’s findings on the BBC’s coverage of an antisemitic attack on Jewish students supply a formal regulatory example of the same failure. The BBC reported that audio recorded inside the victims’ bus contained an anti-Muslim slur. Evidence promptly supplied to the BBC disputed that interpretation and indicated that the Hebrew words meant “Call someone, it’s urgent.” Ofcom found that the BBC News Online article failed the BBC’s requirements of due accuracy and due impartiality; that the BBC failed to acknowledge the dispute and left the article uncorrected for almost eight weeks, an

omission Ofcom called significant and concerning; and that the BBC's broadcast handling was a serious editorial misjudgment that caused distress and anxiety to the victims and the wider Jewish community.⁵⁴

The determination goes to the methodology Respondents advertise. The BBC possessed contrary evidence, continued to present the disputed allegation without adequate qualification, and delayed correcting the resulting impression, the opposite of the verification, impartiality, and correction practices represented to consumers and commercial partners.

(v) The Resulting Commercial Deception

Taken together, these incidents show a recurring course of conduct: omission of Jewish identity, dilution of antisemitic context, use of interested-party terminology, dissemination of disputed claims, and delayed correction after receipt of contrary evidence. Respondents nevertheless market the BBC's history, independence, and editorial discipline as reasons to select and rely on BBC services, generating audience reliance, subscriptions, advertising value, licensing, streaming revenue, and distribution access. Under Section 5, that commercial impression is deceptive: the product is promoted as consistently accurate, independent, and resistant to propaganda while documented editorial practice materially contradicts those representations.⁵⁵

C. Post-War and Contemporary Continuity: Suppression and Distortion Extending From the Farhud to the Present

(See Exhibit C, compiling this pattern of terminology, framing, and contextual omissions.)

The pattern documented in Section VII.A — antisemitic assumptions shaping what the BBC reported, suppressed, or generalized about Jewish victims — continues past the Second World War. It recurs, in substantially similar form, across the institution's subsequent history and into its present-day output.

The Farhud, the June 1941 pogrom against the Jewish community of Baghdad in which approximately 180 Jews were murdered, hundreds were injured, and Jewish property was destroyed on a mass scale, illustrates the editorial pattern Ward, Jordan, and Kushner identify in Section VII.A: the minimization of a specifically anti-Jewish atrocity. The same pattern appears in the BBC's present-day editing. In April 2021, CAMERA UK documented that BBC Arabic edited an AFP wire report on Iraqi Jewish history to omit and soften language describing the Farhud, downplaying the persecution of Iraqi Jews in a report specifically about that persecution.⁵⁶ BBC Arabic reaches United States consumers through BBC.com and the BBC News app. A U.S. reader of that report, including an American whose family came from Iraq or elsewhere in the Middle East, received an account of Middle Eastern Jewish history with its central atrocity removed, from a seller that markets its reporting as accurate and impartial. That is a misleading impression, conveyed to U.S. consumers under the BBC brand, about the identity and history of Jews from the Middle East.

The same holds for the founding of Israel. The United Nations General Assembly adopted Resolution 181 on November 29, 1947; the Jewish Agency accepted the partition plan and the Arab Higher Committee rejected it.⁵⁷ Where BBC historical and retrospective coverage describes the ensuing conflict as generalized “communal violence” without identifying which party accepted and which rejected partition, it omits the facts a reasonable consumer needs to assign responsibility and understand causation.⁵⁸ Each such omission is both a matter of history and a point of law: Section 5 reaches it when it leaves U.S. consumers with a materially misleading impression of events the BBC sells itself as reporting impartially.

This pattern spans incidents, media, and eras. It appears individually and cumulatively across: the wartime and Holocaust-era record documented in Section VII.A; the Farhud minimization documented above; the Al-Shifa Hospital reporting, in which the BBC’s original wording reversed the meaning of an Israeli statement to convey that Israeli forces had targeted medical personnel and civilians rather than entered the hospital accompanied by them (see Exhibit A); the Hamas “summary execution” allegations of January 2024, which the BBC disseminated and later apologized for publishing without adequate verification (see Exhibit A); the *Gaza: How to Survive a Warzone* documentary, broadcast without disclosing that its child narrator was the son of a Hamas official, which the BBC’s own review and a subsequent Ofcom determination both found materially misled viewers (see Section V, note 29); the misidentified Syria photograph presented as Gaza in 2012; and, most recently, the BBC’s live broadcast of the June 28, 2025 Glastonbury Festival performance by the duo Bob Vylan, during which the BBC kept its livestream running through chants of “Death, death to the IDF.” The BBC’s own Executive Complaints Unit subsequently found that this broadcast breached the BBC’s standards on Harm and Offence — though it cleared the BBC of a separate allegation that the broadcast breached its standards of due impartiality — and confirmed that the BBC had itself assessed the performer as “high risk” in advance and broadcast the performance live regardless.⁵⁹

Considered together — spanning nearly a century, multiple language services, multiple formats from wartime radio to a 2025 livestream, and recurring after repeated internal and external notice — these incidents form the sustained, protracted institutional record that marks a genuine pattern of partiality. Complainant characterizes each incident precisely: the BBC’s Executive Complaints Unit adjudicated the Glastonbury broadcast as a harm-and-offence failure and cleared it on due impartiality. Each incident nonetheless reflects the same underlying institutional pattern this Complaint alleges: a recurring failure of editorial control specifically where Jewish and Israel-related content is concerned, admitted or found by the BBC’s own processes or by its regulator on repeated, separate occasions.

These incidents reach United States consumers in two ways. First, BBC English, BBC Arabic, BBC Persian, and BBC News Türkçe content, including the reporting described above, is sold and served to U.S. consumers through BBC.com, the BBC News app, and the other channels described in Section III. Second, where an incident began in a UK-only broadcast, as with the Glastonbury livestream, Respondents reported the controversy, the BBC’s own findings, and the regulatory findings on BBC.com and BBC News, which are marketed to U.S. subscribers. The BBC’s Chairman called the Gaza

documentary failure a “dagger to the heart” of the BBC’s claims to trustworthiness and impartiality,^{59a} the same claims Respondents use to sell BBC news in the United States. In Section 5 terms, each incident is evidence of whether Respondents’ express claims of impartiality and accuracy convey a truthful net impression to U.S. consumers and whether Respondents have a reasonable basis for making them. Section VII.D states the governing rules and applies them.

D. Cumulative Deception, Knowledge, and Materiality to United States Consumers

The issue is whether BBC reporting on historical and foreign events, much of it produced outside the United States, bears on the truth of the impartiality claims Respondents make to U.S. consumers. Three settled rules govern, and the record satisfies each.

(See Exhibit H, compiling decades of independent scholarly and insider critiques of the BBC’s claims of objectivity and independence that predate and corroborate the pattern described in this Section.)

First, Section 5 judges a seller’s claim by the net impression it conveys and requires a reasonable basis for objective claims when they are made. A seller’s past conduct is evidence of what its claims mean, of whether they are substantiated, and of the likelihood that the practice will continue, and courts weigh a history of prior violations in setting the scope of relief.⁶⁰

Second, a claim directed to a particular audience is judged from the perspective of a reasonable member of that audience.^{60a} BBC Arabic, BBC Persian, and BBC News Türkçe are directed to speakers of those languages, and BBC Middle East coverage is directed to consumers who follow the region, including American Jewish, Arab, Iranian, and Turkish communities.

Third, Section 5 deception requires no proof of intent. Where knowledge bears on relief or on the continuing character of a practice, it may be established through actual awareness of material misrepresentations, reckless indifference to their truth or falsity, or awareness of a high probability of deception coupled with intentional avoidance of the truth.⁶¹

Applying these rules, the record supports investigation of whether Respondents maintained their representations of impartiality with actual knowledge of material contrary facts, reckless indifference to their accuracy, or deliberate avoidance of information that would require qualification of the commercial claim.⁶²

The history is part of the claim. Respondents themselves invoke the BBC’s history, including its wartime reputation, as proof of its present impartiality (see Sections V and VII.A). Having made the institution’s history part of the commercial claim, Respondents have placed that history at issue, and the historical evidence is material to subscriptions, reliance, advertising, licensing, distribution, commercial partnerships, and competition in the United States marketplace.⁶³

The audience is real and commercially valuable. More than 3.5 million U.S. residents reported Middle Eastern or North African origin in the 2020 Census, with Lebanese, Iranian, and Egyptian Americans the largest groups and Iraqi, Syrian, Palestinian, and

Israeli communities each above 100,000. Respondents sell that audience to U.S. advertisers through BBC.com and BBC Studios' U.S. advertising operations (see Section III). Consumers choose news sources they trust and that reflect their own perspectives, so a reputation for impartiality on the Middle East is itself a selling point to these communities and to the advertisers who seek them.^{63a} A misleading impression about Middle Eastern history and conflict, conveyed under that reputation, is material to their choice of news source. The historical and foreign record is therefore relevant evidence under each governing rule, and it supports the investigation and relief requested. (See Exhibit C, Section I and notes 172g–172i.)

Respondents' misleading editorial conduct extends beyond the Middle East. In December 2025, President Trump sued the BBC in the Southern District of Florida for defamation and for violating Florida's Deceptive and Unfair Trade Practices Act over a *Panorama* documentary that edited his January 6, 2021 remarks; the BBC's Chairman acknowledged that the edit "gave the mistaken impression" of "a direct call for violent action."⁶⁴ The case is pending, and this Complaint takes no position on its merits. It matters here for two reasons. It shows the same institutional failure, a misleading impression created by selective editing, on a subject unrelated to Israel. And it places the reach of BBC content in the United States in factual dispute: the amended complaint, filed in August 2026, relies on BBC data produced in discovery showing 34 play starts attributed to Florida and about 285 from possible U.S. addresses, and alleges that the BBC had contemporaneous notice that its geoblocking was failing. The BBC has moved to dismiss, calling those figures unreliable and the access unauthorized.⁶⁵

VIII. COMMERCIAL CONFLICTS OF INTEREST: QATAR, SAUDI ARABIA, AND TURKEY RELATIONSHIPS, IRAN ACCESS, AND THE MISLEADING IMPRESSION OF IMPARTIALITY

(See Exhibit D, compiling the commercial sponsorship, state-linked partnership, and disclosure evidence discussed in this Section.)

United States consumers receive BBC Arabic, BBC Persian, and BBC News Türkçe directly. All three are World Service language services served through BBC.com and the BBC News app, which Respondents fund in the United States through advertising and through paid subscriptions sold in the United States and Canada; BBC Studios separately sells the BBC's U.S. digital audience to American advertisers (see Section III). This Section shows that Respondents accept payment from state entities of Saudi Arabia, Qatar, and Turkey, and accept reporting restrictions from the government of Iran in exchange for access, while selling that news to U.S. consumers as impartial and independent. Paid state sponsorship of this kind is a conflict of interest, and Respondents keep it from the consumers who buy the news.

The pattern is straightforward. BBC StoryWorks makes money producing glossy promotional films for the governments of Saudi Arabia, Qatar, and Turkey. The films present those states as attractive destinations and investment partners and leave out their human-rights records and, for Qatar and Turkey, their support for Hamas. BBC News then reports on the same governments, including their roles in the war between Israel and Hamas, under a brand sold as impartial. Parliamentary submissions, public hearings,

independent reporting, internal reviews, and reform proposals have raised concerns about BBC Arabic's standards, contributor vetting, and terminology on Hamas, Hezbollah, and Israel. (See Exhibits F, G, and I.)

A. Saudi Arabia

BBC StoryWorks produced a series of paid promotional films for Saudi Arabia's Public Investment Fund, the sovereign wealth fund chaired by Crown Prince Mohammed bin Salman.⁶⁶ The films promote the fund's environmental and development projects and omit that the state oil company plans to raise gas output by about 80 percent by 2030 and is estimated to account for more than 4 percent of global greenhouse gas emissions since 1965.⁶⁷ Human Rights Watch's Saudi Arabia researcher, commenting on the BBC's films, described the fund's content strategy as "soft-power influence" used to "whitewash Saudi government abuses."⁶⁸

In plain terms, the BBC is paid to make promotional films for the Saudi state while BBC News reports on that state's human-rights record and governance. A U.S. consumer weighing the BBC's claim of independence on Saudi Arabia is never told of the payment. That omission is material because it bears directly on the credibility of the source.⁶⁹

B. Qatar

BBC StoryWorks produced the *Discover Culture in Qatar* campaign, labeled by StoryWorks itself "#Ad paid and presented by Visit Qatar."⁷⁰ BBC Studios supplies inflight entertainment to state-owned Qatar Airways under a renewed partnership.⁷¹ Amnesty International criticized the BBC's promotional Qatar material around the 2022 World Cup as "uncritical" advertising that helped Qatar present a sanitized image while its human-rights record was under scrutiny.⁷²

This work is part of a large business. BBC Studios' advertising and branded-content arm generated about £294 million (\$360 million) in advertising revenue in a recent year.⁷³ When senior BBC journalists objected to StoryWorks producing paid content for authoritarian-state clients, the BBC answered that its commercial work is "entirely separate" from its journalism.⁷⁴ U.S. consumers receive that assurance and never learn of the relationships behind it.

BBC journalists have at times reported critically on Qatar, including the 2015 detention of correspondent Mark Lobel while he reported on migrant-worker conditions.⁷⁵ Critical stories elsewhere leave the conflict of interest in place. Qatar hosts Hamas's political leadership and is central to the diplomacy of the Gaza war. When BBC coverage treats Qatar favorably, consumers and businesses deciding whether to rely on it are entitled to know that the Qatari state pays the BBC. Undisclosed economic dependence of this kind misleads consumers and distorts their choices.

Qatar's method with respected Western institutions is documented. (1) The U.S. Department of Education reports Qatar as the largest foreign funder of American colleges and universities, at about \$8.8 billion.⁷⁶ (2) Contracts released by the House Committee on Education and the Workforce in March 2026 publicly describe the American institution as fully independent, while separate provisions give Qatar consultation rights

over senior appointments, approval rights over intellectual property, and equal board representation.⁷⁷ (3) One university's Doha journalism program places graduates with and trains leadership for Al Jazeera, whose U.S. affiliate the Department of Justice directed in 2020 to register as a foreign agent.⁷⁸

The BBC gives the same kind of assurance: its commercial work is “entirely separate” from its journalism.⁷⁹ The legal question is whether a reasonable consumer, knowing of a paid relationship with Qatar, would weigh it in evaluating the BBC's claim of independence. Materiality turns on that question; proof that the payment changed coverage is unnecessary.⁸⁰

Federal regulators already treat this risk as real. Under the FCC's foreign sponsorship identification rules, compliance guidance grouped BBC programming with Al Jazeera, France 24, and Deutsche Welle as international broadcasters whose U.S. carriage agreements required review.⁸¹ Al Jazeera's U.S. affiliate was directed in 2020 to register as a foreign agent of Qatar.⁸²

The FTC framework applies directly. Respondents represent the BBC as impartial and independent while omitting the paid Qatar relationships described above.⁸³ The “entirely separate” assurance is itself an implied claim that those relationships have no bearing on editorial independence,⁸⁴ and a seller making that claim must have a reasonable basis for it.⁸⁵ The net impression of Respondents' impartiality claims, with the relationships omitted, misleads reasonable consumers.⁸⁶

Two federal regimes require disclosure of exactly this kind of connection. The FCC requires broadcasters to identify programming furnished by foreign governments, because American audiences are entitled to know who stands behind the content. The Commission's Endorsement Guides require disclosure of a material connection between a content source and a paying party whenever that connection would affect how consumers weigh the content. Respondents' paid relationship with Qatar is such a connection.⁸⁷

Accordingly, the Commission should investigate whether Respondents' undisclosed financial relationships with Qatari state entities render their representations of impartiality and independence deceptive under Section 5.

C. Iran

The BBC carried Iran's wartime propaganda to American audiences. During active hostilities with the United States in March 2026, BBC Monitoring disseminated an IRGC claim of 560 American casualties, a false figure from a propaganda apparatus the United States has sanctioned. Whatever the BBC intended, that report served Iran's war effort. The key question is why, and the answer lies in the BBC's access to Iran, which comes on conditions the BBC has admitted accepting. That relationship warrants investigation.

BBC Persian depends on continued access to one of the world's most restrictive information environments,⁸⁸ and Iranian authorities have threatened, surveilled, and intimidated its journalists.⁸⁹

In 2022, the National Union of Journalists reported that BBC management accepted Iranian government-imposed reporting restrictions in exchange for access, and a BBC

World Service spokesperson confirmed: “We accepted some limitations on this occasion in order to provide our audiences with rare insights from inside the country.”⁹⁰ Sadeq Saba, former head of BBC Persian, has said the service lost credibility by failing to reflect the views of regime critics and has long been derided in the diaspora as “Ayatollah BBC.”⁹¹

The same accommodation extends to Iran’s principal proxy. A 2007 analysis of coverage of the 2006 Israel–Hezbollah war found that BBC coverage “tipped against Israel.”⁹² In March 2026, a BBC World Service segment described Hezbollah as “supported by” Iran and as a movement “some Lebanese see as a resistance group,” omitting that the IRGC founded and directs it.⁹³ The following month, the BBC covered the funeral of a Hezbollah media operative sympathetically, omitting Hezbollah’s own credit to him for supplying intelligence on Israeli troop positions.⁹⁴

BBC reporting has also described Al-Manar, which the Treasury Department designated a Specially Designated Global Terrorist entity in 2006,⁹⁵ as “affiliated with” Hezbollah, although the same correspondent elsewhere called it the television station owned by Hezbollah.⁹⁶

BBC News has also relayed Hezbollah’s account of the fighting from tours Hezbollah organized. On March 7, 2026, the BBC News website published a report from a southern Lebanese town that Hezbollah had allowed journalists to enter, presenting Hezbollah’s account of clashes with Israeli forces while leaving out reports that Hezbollah operatives had been killed.^{96a} Twelve days later, the World Service explainer described above presented Hezbollah as a group “some Lebanese see as a resistance group.”

Taken together, this evidence shows BBC reporting supporting Hezbollah, a terrorist organization designated by the United States and the United Kingdom. The BBC adopts Hezbollah’s self-description, relays its accounts from tours it controls, softens its direction by Iran, and understates the status of its designated broadcaster. U.S. consumers relying on the BBC’s marketed impartiality receive none of that context.

The March 2026 casualty claim followed the same path. BBC Monitoring disseminated the IRGC figure of 560 American soldiers killed or wounded, contrary to confirmed U.S. military reporting.⁹⁷ The Treasury Department has sanctioned the IRGC and regime-controlled outlets Fars News, Tasnim News, and Press TV, and earlier designated Iran’s state broadcaster, IRIB, for participating in censorship.⁹⁸ Respondents carried the claim under the BBC brand with neither its provenance nor the BBC’s access arrangement with the same government disclosed.

Reach into Iran is a commercial asset: the £137 million the World Service receives from the Foreign, Commonwealth and Development Office is justified in part by its reach in restricted markets such as Iran.⁹⁹ The FCC’s foreign sponsorship rules and the Commission’s Endorsement Guides both treat undisclosed foreign-government relationships as information audiences are entitled to have, and an agreement to accept a foreign government’s reporting restrictions in exchange for access is such a relationship.

Accordingly, the Commission should investigate the BBC’s relationship with the government of Iran, the terms of its access, and whether Respondents’ claims of

independence and impartiality are deceptive under Section 5 in light of that relationship, the BBC's treatment of Iran's proxy and its designated media, and the BBC's dissemination of a false wartime casualty claim about American troops.¹⁰⁰

D. Turkey

BBC StoryWorks has also accepted payment from the government of Turkey. It produced the “Colours of Türkiye” destination campaign, and its own videos for that campaign carry the label “#Ad paid and presented by GoTürkiye.” GoTürkiye is the brand of the Türkiye Tourism Promotion and Development Agency, established in 2019 as a related entity of Turkey's Ministry of Culture and Tourism, with its Board of Directors chaired by the Deputy Minister of Culture and Tourism. A published case study of the campaign describes BBC StoryWorks' objective as redefining Türkiye's brand identity for a global audience. (See Section IV.A and note 11a.)

BBC News reports on the same government, including through BBC News Türkçe, a World Service language service that Respondents serve to U.S. consumers on BBC.com within the same advertising and subscription business described in Section III. Turkey's President has called Hamas a “liberation group” and has repeatedly hosted Hamas leaders whom the United States designates as Specially Designated Global Terrorists, and the Treasury Department has sanctioned Hamas's investment network, financial officials, charities, and a money exchange operating from Turkish territory. (See Section II.D and note 11.)

The Turkey relationship carries the same conflict of interest. Respondents are paid by a government that hosts the leadership of one party to the war BBC News covers, and they sell that coverage, in English and in Turkish, to U.S. consumers as impartial with the payment undisclosed. The Commission should investigate Respondents' financial and commercial relationships with the government of Turkey and its state-linked entities, and whether those relationships render Respondents' impartiality claims deceptive under Section 5.

E. Paid State Sponsorship Is a Conflict of Interest

Each relationship follows the same pattern. Respondents take payment or access from a government whose conduct BBC News covers, keep the relationship from the consumers of that coverage, and report on subjects in which that government has a stake. Qatar and Turkey, the hosts of Hamas's leadership, pay BBC StoryWorks while BBC Arabic adopts Hezbollah's terminology and draws recurring concerns over its treatment of Hamas (see Sections II.B and V). Saudi Arabia pays for promotional films while BBC News reports on its record. Iran grants access on conditions the BBC has accepted while BBC coverage softens Iran's proxy and carried an IRGC casualty claim. Paid sponsorship by a state whose conduct a news organization covers is a conflict of interest, and selling the news as impartial while concealing that conflict is the deception Section 5 prohibits.

The pattern is as old as the BBC. Its wartime Holocaust reporting was shaped in part by its relationship with the Foreign Office, which funded and directed significant parts of its international broadcasting.¹⁰¹ The World Service received £137 million from the Foreign, Commonwealth and Development Office for 2025–2026, and the UK Government calls it

an instrument of British soft power (see Section V).¹⁰² The BBC's dependency now extends to subscriptions, licensing, and a branded-content and advertising business generating hundreds of millions of pounds a year.¹⁰³ Its 2026 appointment of Matt Brittin, formerly President of Google's Europe, Middle East, and Africa operations, as Director-General reflects where it sees its commercial future.¹⁰⁴

Respondents tell U.S. consumers that BBC news is independent of the governments and commercial relationships that fund it. The evidence shows BBC output aligning with the interests of separate paying and access-granting governments. That evidence is material to every one of Respondents' impartiality claims.¹⁰⁵

IX. MATERIALITY, CONSUMER RELIANCE, COMMERCIAL INJURY, AND PUBLIC INTEREST HARM

(See Exhibit A, compiling corroborating evidence of BBC misrepresentations in reporting of the 2023–2025 Gaza war, including statements from former BBC officials, independent regulatory findings, and quantitative media audits relevant to the materiality analysis in this Section.)

Section 5 prohibits deceptive acts or practices in or affecting commerce by any person, partnership, or corporation, and the Commission applies it to sellers of information and media services as it does to any other merchant.^{105a} The BBC is a merchant of news services. It sells subscriptions, advertising, licensing, and syndication in the United States on the strength of a product description: impartial, independent, accurate, and trustworthy.

A practice is deceptive if it involves a representation or omission likely to mislead consumers acting reasonably under the circumstances, and the representation or omission is material, meaning likely to affect consumers' choice of, or conduct regarding, a product.^{105b} The issue is whether the BBC's description of its news product meets that test. Each element is set out below with its governing authority and applied to the record. Each is met.

A. Net Impression

The Commission reads an advertisement as a whole: express and implied claims, omissions, and context together. Literally true statements deceive when the overall impression misleads reasonable consumers. Respondents' claims of impartiality, independence, accuracy, and superior verification are therefore evaluated together.¹⁰⁶

Respondents market BBC news through BBC.com, BBC World News, BBC Select, media kits, subscription offers, advertising, licensing, and branded-content partnerships directed to U.S. consumers and businesses. A reasonable consumer takes these claims to mean that BBC news is produced under consistently applied standards that set it apart from competitors, and that Respondents have a reasonable basis for saying so.¹⁰⁷

The net impression is misleading because Respondents omit the facts that qualify it: the reporting failures, internal reviews, corrections and apologies, regulatory findings, divergent language-service practices, government relationships, and paid relationships

with foreign states set out in this Complaint. Consumers receive a product different from the one advertised.¹⁰⁸

The courts apply the same rule. In *FTC v. Colgate-Palmolive Co.*, the Supreme Court approved the Commission's focus on the net impression of an advertisement. In *FTC v. Cyberspace.com LLC*, the Ninth Circuit held that literally true language violates Section 5 when the overall impression misleads. In *POM Wonderful, LLC v. FTC*, the D.C. Circuit held that objective claims are judged from the reasonable consumer's perspective and require competent and reliable substantiation.¹⁰⁹

Respondents' claims go to the institution itself. The BBC is presented as impartial, independent, reliable, and rigorously verified, and that presentation is meant to carry over to every BBC news product sold in the United States. The Commission should therefore measure the overall impression against the institutional record as a whole.¹¹⁰

B. Materiality

A representation is material if it is likely to affect a consumer's choice of, or conduct regarding, a product. Express claims are presumed material because the seller chose to feature them, and consumers are injured when deception leads them to act differently than they otherwise would.¹¹¹

Impartiality, independence, accuracy, and trustworthiness are the attributes Respondents feature to sell BBC news over competing sources to consumers, advertisers, distributors, licensors, schools, and governments. They are express claims and presumptively material.¹¹²

Respondents' own sales materials confirm it. BBC Global News markets the BBC to brands as "the world's most trusted international news broadcaster" and sells sponsorship and advertising built on that reputation. The Commission's Enforcement Policy Statement on Deceptively Formatted Advertisements recognizes the same commercial fact: consumers give greater credibility to information they believe comes from an independent source.¹¹³ A seller that markets trust as its product's defining feature has itself established that trust is material to its customers.¹¹⁴

The Commission has repeatedly treated misrepresented independence as material: reviews falsely presented as independent consumer opinions (*Legacy Learning Systems*), paid endorsements styled as objective gaming reviews (*Machinima*), sponsored gameplay videos presented as independent reviews (*Warner Bros. Home Entertainment*), and paid influencer posts presented as independent opinion (*Lord & Taylor*). In each case the deception concerned the independence of the source.¹¹⁵

Materiality here is stronger still. Those cases involved individual endorsements or discrete campaigns. Respondents market the institutional credibility of one of the world's largest news organizations as the defining feature of an entire portfolio of products sold in the United States. The claims are presumptively material, and the record confirms their materiality in fact.¹¹⁶

C. Consumer Reliance

Consumers choosing among news sources weigh exactly the attributes Respondents advertise. A subscriber buys information gathered, verified, and presented by an organization with the qualities the marketing describes.¹¹⁷

Respondents' own materials, which call the BBC "the world's most trusted international news broadcaster" and present trust as the defining feature of BBC Global News, show that Respondents expect these claims to win customers.¹¹⁸ The claims have commercial value only because consumers rely on them.

Independent research agrees. The Reuters Institute reports that trust significantly affects which news providers consumers use and rely on, and the Pew Research Center finds that perceived accuracy, fairness, and credibility drive consumer confidence in news organizations.¹¹⁹

Reliance runs through every channel Respondents sell. Consumers rely on the claims when they subscribe, use BBC digital content, or watch BBC programming. Advertisers, licensees, syndication partners, and distributors rely on them when they buy. Schools, libraries, governments, and businesses rely on them when they select BBC content for research, instruction, and public use.¹²⁰

Reliance then multiplies. BBC reporting is quoted, licensed, syndicated, translated, and republished throughout the United States, and each downstream user relies on the reputation Respondents cultivated as much as on the report itself.¹²¹

Reliance on an institution's credibility is broader and more durable than reliance on a single endorsement, which makes the harm here greater than in the Commission's endorsement and native-advertising cases.¹²²

D. Knowledge and Continuing Deceptive Practices

Respondents continue to make the challenged claims in the face of a long record of reporting failures, corrections, apologies, internal reviews, regulatory findings, and governmental criticism concerning the very standards they advertise. That record rules out isolated error.¹²³

An advertiser that keeps repeating a claim after learning it is inaccurate or unsubstantiated engages in a continuing deceptive practice.¹²⁴

The Balen Report shows institutional knowledge. The BBC commissioned Malcolm Balen to review its Israeli–Palestinian coverage after sustained complaints. Its Journalism Board considered the report in November 2004, commissioned a follow-up paper, *Taking Forward BBC Coverage of the Middle East*, and adopted corrective measures, including training, auditing of on-air experts, and a new Middle East Editor post. The BBC thus knew of problems serious enough to require corrective action. It still withholds the report while marketing its history and methods as proof of impartiality.¹²⁵

Corrections and apologies show the same knowledge. Respondents have corrected or apologized for reporting on the Al-Ahli Hospital explosion, Al-Shifa Hospital, the falsely attributed "summary executions" allegation, and the Gaza aid site. Each correction shows that the failure reached responsible editors and was found to breach BBC standards.¹²⁶

So do repeat assignments and uncorrected records. Jon Donnison apologized in November 2012 for circulating an image from Syria as one from Gaza; the same year, a child's death first attributed to an Israeli strike was later assessed by a United Nations investigation as likely caused by a misfired Palestinian rocket. The BBC kept Donnison on major Middle East assignments. On October 17, 2023, he presented an Israeli strike as the most plausible explanation for the Al-Ahli Hospital explosion before verification, which the BBC later acknowledged fell short of its due-accuracy standard. In April 2024, BBC reporting described Hazem al-Aidi as a Gaza Civil Defense "first responder"; Israeli authorities later identified him as an alleged Hamas operative in the October 7 attacks, and CAMERA UK reported in 2026 that the BBC's complaints process declined to update the online record.¹²⁷ Complainant alleges no bad faith in the original report; the point is that Respondents, once on notice, left the record uncorrected. Jeremy Bowen likewise remained a senior Middle East editor after a BBC Trust finding that his reporting breached editorial standards. Respondents kept these journalists in prominent roles and left the record uncorrected while marketing BBC journalism as uniquely reliable and rigorously verified.¹²⁸

Gaza: How to Survive a Warzone shows knowledge at the top of the institution. The BBC's own review found the documentary breached its accuracy guidelines because viewers were never told that the child narrator's father held a position in the Hamas-run administration. The BBC withdrew the program, its leadership acknowledged the failure, Ofcom wrote to the BBC Chair, and on October 17, 2025, Ofcom found that the program materially misled the audience. The failure lay in the very verification and disclosure procedures Respondents advertise.¹²⁹

The Asserson Report and the Prescott memorandum carried the notice to the Board and to Parliament. The Asserson Report analyzed millions of words of BBC English and BBC Arabic output after October 7, 2023 and documented extensive alleged departures from the Editorial Guidelines. Michael Prescott, an independent adviser to the BBC's Editorial Guidelines and Standards Committee, sent his concerns to the BBC Chair on leaving; the Culture Secretary discussed them with the Chair, and the Culture, Media and Sport Committee and the Public Accounts Committee placed them on the Parliamentary record.¹³⁰

Parliament has now made formal findings. On October 1, 2026, the House of Commons Digital, Culture, Media and Sport Committee, reviewing the BBC's Royal Charter, cited the Gaza documentary, the Bob Vylan Glastonbury broadcast, and the *Panorama* edit of President Trump's speech as "failures or lapses in the BBC's editorial standards." It found that the BBC had struggled to respond with confidence, recorded the resulting resignations of the Director-General and the head of BBC News, noted ten months without a permanent Head of News, and said it would watch how future incidents are handled. These findings concern the same BBC News operation Respondents sell to U.S. consumers through BBC.com, and Respondents continue to make the representations described in Section V without disclosing them.^{130a}

In short, Respondents commissioned reviews, adopted corrective measures, adjudicated complaints, issued corrections and apologies, withdrew content, received adverse Ofcom findings and independent analyses, and answered to Parliament. They then kept

marketing BBC news in the United States as consistently impartial, independent, accurate, and rigorously verified, with none of that information disclosed. Section 5 deception requires no proof of intent; this record nonetheless shows the claims were made with actual awareness of contrary facts or, at minimum, reckless indifference to them, and that the deception is continuing.¹³¹

E. Amplified Consumer and Marketplace Harm

Third parties repeat BBC reporting without independent verification, especially during fast-moving events. BBC errors therefore spread through other outlets and platforms to audiences far beyond Respondents' own customers, and later corrections reach far fewer people than the original story.¹³² The century-old reputation Respondents market makes that amplification greater than for any ordinary media enterprise.

The deception also distorts competition. Consumers who chose BBC products over competitors did so in reliance on Respondents' claims of trustworthiness, impartiality, and independence, and the resulting subscription, advertising, licensing, and syndication revenue came at the expense of competing news organizations. That is the marketplace harm Section 5 exists to prevent.¹³³

X. THE FIRST AMENDMENT PERMITS THIS COMPLAINT

This Complaint challenges Respondents' advertising and leaves their journalism to them. What to report, how to frame it, which sources to use, and which facts to include are editorial judgments protected by the First Amendment and outside the Commission's authority; the Complaint asks the Commission to review none of them.¹³⁴ It challenges Respondents' separate sales claims — in subscription marketing, advertising sales materials, branded-content pitches, and public statements — that BBC news has the attributes of impartiality, independence, and superior verification. Those claims are commercial speech, and the Commission's authority to require that commercial speech be truthful is settled.¹³⁵

A. Respondents' Impartiality Representations Satisfy the Governing Test for Commercial Speech

Courts ask whether a communication is an advertisement, refers to a specific product, and is made for economic motivation; together these factors strongly support treating it as commercial speech.¹³⁶ Respondents' claims meet all three. They appear in media kits, subscription offers, advertising sales presentations, and branded-content pitches.¹³⁷ They refer to specific products: BBC.com, BBC World News, BBC Select, and related subscription and advertising-supported services.¹³⁸ And they are made to drive subscription, advertising, licensing, and syndication revenue.¹³⁹ They are commercial speech.

B. Commercial Speech That Is False or Misleading Receives No First Amendment Protection

False or misleading commercial speech receives no First Amendment protection; it is excluded at the threshold, before any balancing of interests.¹⁴⁰ The government "may ban forms of communication more likely to deceive the public than to inform it," and the

substantial-interest test that governs restrictions on truthful commercial speech has no application to deceptive claims.¹⁴¹ Respondents' impartiality claims, which their own institutional record fails to support, fall within that category. If Respondents argue the claims are only potentially misleading, the alternative relief in Section XII, which permits the claims only when they are non-misleading and substantiated, answers the argument.

C. The Commission's Authority to Regulate False Commercial Representations of Objectivity and Independence Is Established and Has Been Applied to Media-Adjacent Entities

POM Wonderful, LLC v. FTC confirms that the Commission's authority over objective commercial claims survives First Amendment challenge, even where the claims touch matters of public interest such as health.¹⁴² The Commission has applied that authority to claims of objectivity and independence: *LendEDU* (rankings advertised as "objective," "accurate," and "unbiased"), *TRUSTe* (independent certification), and *Legacy Learning, Machinima, Lord & Taylor, and Warner Bros. Home Entertainment* (paid content presented as independent judgment).¹⁴³ Each case turned on whether the claimed independence of the source was true. This Complaint presents the same question.

D. This Complaint Is Distinguishable From Cases Protecting Editorial Judgment

Respondents may invoke *Miami Herald Publishing Co. v. Tornillo*, which barred a state from compelling a newspaper to print a candidate's reply because compulsion intruded on editorial choices.¹⁴⁴ *Tornillo* protects what a publisher prints. A publisher's claims about the character of its own institution, made to sell its product, remain subject to truth-in-advertising law. The Commission can test Respondents' impartiality claims against their institutional record exactly as it tests any seller's claims about its product, with every item of BBC news content left untouched.

E. Disclosure-Based Relief Presents Minimal First Amendment Concern

Any disclosure remedy, such as requiring Respondents to substantiate impartiality claims or to disclose material relationships bearing on them, is reviewed under the deferential standard for compelled disclosure of purely factual and uncontroversial information reasonably related to preventing deception.¹⁴⁵ Courts prefer disclosure and qualification to outright prohibition of potentially misleading commercial speech, which further reduces any First Amendment concern.¹⁴⁶

XI. CONCLUSION

This is a case of commercial deception. Respondents sell BBC-branded news in the United States as impartial, independent, and trustworthy, and Section 5 holds them to the same standard the Commission applies to every company that sells a product on a description the product fails to meet: the comparison site that called paid rankings "objective" and "unbiased" (*LendEDU*), the publisher that presented paid advertising as independent opinion (*Inside Publications*), and every other seller whose product differs from its label.

The departure is as old as the claim. The BBC was incorporated by Royal Charter in 1927, months after the 1926 General Strike, during which it restricted the voices the

government opposed while its first Director-General privately acknowledged that the government trusted it to avoid genuine impartiality. It served British domestic policy from its founding and British foreign policy through the Second World War, when, historians have found, its wartime reporting suppressed and minimized news of the Holocaust. That relationship with the British state continues today. The BBC must obtain the Foreign Secretary's agreement before closing any World Service language service and must agree the World Service's annual objectives, priorities, and targets with the Foreign Office; Parliament's Committee of Public Accounts calls the World Service a "core instrument of UK soft power"; the BBC's Chairman calls the BBC one of Britain's "strongest calling cards on soft power"; and the BBC's own 2025/26 Annual Report describes the BBC as "carrying the UK's voice, values, and influence" to the world. (See Sections V and VII.A and Exhibits B and E.)

Respondents also take money and access from foreign governments whose conduct BBC News reports, and they report on those governments without disclosing the relationships. BBC StoryWorks makes money producing glossy promotional films for Qatar, for Saudi Arabia's sovereign wealth fund, and for GoTürkiye, the brand of Turkey's state tourism agency, while BBC News reports on all three governments. Human Rights Watch says the Saudi content serves to whitewash government abuses; a news organization that makes paid promotional films for a state cannot credibly claim impartiality in covering it. The BBC has acknowledged accepting Iranian government-imposed limitations in exchange for reporting access inside Iran. Iran, Qatar, and Turkey each support Hamas, a designated foreign terrorist organization, directly and indirectly: Iran funds Hamas as a designated State Sponsor of Terrorism; Qatar has hosted Hamas's political leadership and funded the payroll of its government in Gaza; and Turkey hosts Hamas leaders and the Hamas financial networks the U.S. Treasury has repeatedly sanctioned. (See Sections II.D, IV.A, and VIII.)

The news product bears out those conflicts. BBC Arabic has adopted Hezbollah's own self-description, "the Islamic resistance," for a designated foreign terrorist organization, and repeated it after correction. BBC Monitoring carried the IRGC's wartime claim of 560 American casualties. Ofcom found a BBC Gaza documentary materially misleading. The Balen Report, the Asserson Report, the Prescott memorandum, and the BBC's own corrections and apologies document a pattern of departures from impartiality in BBC reporting on Israel, and Parliament has identified egregious failures beyond that subject, including the *Panorama* edit and the Glastonbury broadcast. Recurring across nearly a century, from wartime radio and the Farhud to the Gaza war, and across language services and formats, the record is objective evidence of institutional antisemitism at the BBC: a recurring editorial treatment of Jews and Israel that underlies, and is reinforced by, the BBC's policy and commercial relationships. (See Sections VI, VII, and IX and Exhibits A, F, G, and I.)

Each of these facts separately, and all of them together, negates Respondents' claim to impartiality. On this record, Respondents may not market BBC news to U.S. consumers as impartial. Complainant therefore asks the Commission to enjoin Respondents from promoting BBC news to U.S. consumers and businesses as impartial, and to investigate Respondents' financial, commercial, and access ties to the governments of Iran, Qatar, and Turkey.

XII. REQUEST FOR INVESTIGATION, CEASE-AND-DESIST ORDER, AND OTHER RELIEF

WHEREFORE, Complainant respectfully requests that the Federal Trade Commission:

1. Investigate whether Respondents' representations concerning the impartiality, independence, accuracy, historical reliability, and editorial verification of BBC-branded news products constitute deceptive acts or practices in or affecting commerce within the meaning of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45;
2. Issue a cease-and-desist order under Section 5(b), 15 U.S.C. § 45(b), or seek a permanent injunction under Section 13(b), 15 U.S.C. § 53(b), prohibiting Respondents from representing, expressly or by implication, in any advertising, marketing, promotional, subscription, licensing, or sales material directed to U.S. consumers or businesses, that BBC-branded news products are impartial, consistent with the injunctive relief ordered in *LendEDU*, *Inside Publications*, and *Creaxion*; and, in the alternative, prohibiting Respondents from representing that BBC-branded news products are impartial, independent, accurate, or trustworthy unless the representation is not misleading and Respondents possess competent and reliable evidence substantiating it at the time it is made;
3. Provide that Respondents' failure to remove the prohibited representations from their U.S. advertising, marketing, subscription, licensing, and sales materials within the period the order specifies will subject Respondents to civil penalties under Section 5(l) of the FTC Act, 15 U.S.C. § 45(l), for each violation and for each day of continuing violation, and, for any court-ordered injunction, to contempt;
4. Investigate Respondents' financial, commercial, and access relationships with the governments of Iran, Qatar, and Turkey, and with Saudi Arabia, including their state-linked entities, and the extent to which those relationships, and the direct and indirect support of Iran, Qatar, and Turkey for Hamas, bear on the accuracy of Respondents' representations of impartiality and independence;
5. Determine whether Respondents' marketing, subscription, licensing, advertising, and distribution practices in the United States require corrective disclosure, modification, or other remedial action to prevent continued consumer deception, including disclosure of Respondents' financial, commercial, and access relationships with any government or state-linked entity in reporting on that government or entity;
6. Exercise the Commission's investigative authority under Section 6 of the Federal Trade Commission Act, 15 U.S.C. § 46, to obtain such information from Respondents as the Commission deems necessary to evaluate the allegations in this Complaint; and
7. Take such further action as the Commission determines is warranted to protect United States consumers, advertisers, and competitors from the practices described in this Complaint.

Respectfully submitted,

Israel Media Monitor LLC

By: _____

Date: _____

ENDNOTES

1. See FTC Policy Statement on Deception, appended to *Cliffdale Associates, Inc.*, 103 F.T.C. 110, 174 (1984) (a representation, omission, or practice is deceptive if it is likely to mislead consumers acting reasonably under the circumstances and is material to their purchasing or other decisions); *FTC v. Colgate-Palmolive Co.*, 380 U.S. 374 (1965) (deception determined by the overall net impression conveyed to consumers); *POM Wonderful, LLC v. FTC*, 777 F.3d 478 (D.C. Cir. 2015) (objective advertising claims require competent and reliable substantiation); *Better Living, Inc.*, 54 F.T.C. 648 (1957), *aff'd*, 259 F.2d 271 (3d Cir. 1958) (bait-and-switch and delivery of a materially different product than represented); *True Ultimate Standards Everywhere, Inc. (TRUSTe)*, FTC File No. 132-3219, Docket No. C-4512 (2015) (misrepresentations regarding trust and certification claims); *Shop Tutors, Inc., d/b/a LendEDU*, FTC File No. 182-3180, Docket No. C-4719 (2020) (deceptive representations concerning the independence and objectivity of product rankings).
2. BBC Studios Digital Brands, “We are BBC Studios Digital Brands,” describing digital-brand operations across YouTube, Facebook, TikTok, Instagram, Snapchat, and other major social networks; BBC Studios Press Room, “BBC Studios Names Tara Maitra as Chief Commercial Officer and Jennifer Ball as Senior Vice President, Marketing in Newly Created Roles to Bolster Brand in the U.S.”
3. Reuters, “BBC Rolls Out Paid Subscriptions for U.S. Users,” June 26, 2025; The Guardian, “BBC to Start Charging U.S.-Based Consumers for News and TV Coverage,” June 26, 2025; Broadband TV News, “BBC Launches Payment Plan for BBC.com in the U.S.,” June 26, 2025.
4. Broadcast, “BBC Studios Revenues Hit Record £2.1bn,” July 15, 2025; BBC Group Annual Report and Accounts 2024–2025, July 15, 2025; C21Media, “Bluey and Streaming Help BBC Commercial Rebound with Record Revenue,” July 15, 2025.
5. The Guardian, “ITV Sells Stake in BritBox International to BBC Studios for £255m,” March 1, 2024; CBS News, “CBS News and BBC News Join Forces Around the Globe,” July 13, 2017; BBC Studios Press Room, “BBC Studios Names Tara Maitra as Chief Commercial Officer and Jennifer Ball as Senior Vice President, Marketing in Newly Created Roles to Bolster Brand in the U.S.”
- 5a. Digital, Culture, Media and Sport Committee, *BBC Royal Charter Review*, Fourth Report of Session 2026–27, HC 140 (House of Commons, Oct. 1, 2026) (“Committee Report”), ¶ 73 (Charter conditions on commercial activities; BBC

Studios “manages and licences BBC brands globally”), ¶ 75 (BBC Commercial revenues of £2.15 billion in 2024/25; average annual dividends of £125 million to fund public service content), ¶ 76 (recommending that BBC Commercial’s borrowing limit be raised), ¶¶ 82–83 (recommending that the BBC explore an international TV licence), ¶ 161 (supporting revenue from BBC YouTube content “both domestically and overseas”); see also id. ¶ 10 (quoting the first Public Purpose), ¶ 128 (concluding that the BBC “remains a highly trusted news provider” and must deliver news where audiences are).

6. BBC Studios Digital Brands, “We are BBC Studios Digital Brands”; BBC Studios, “Lindsay Turner Appointed VP Digital Growth and Strategy, BBC Studios Digital Brands,” June 10, 2026.
7. BBC Press Office, “Matt Brittin Appointed BBC Director-General,” March 2026; Associated Press, “BBC Names Ex-Google Executive Matt Brittin Its New Director-General as It Faces a Feud with Trump,” March 2026; The Guardian, “Former Google Executive Matt Brittin Selected to Be Next BBC Director General,” March 25, 2026.
8. FTC, “FTC Alleges Deception in ‘Unbiased’ Review Site’s Ratings and Rankings,” Feb. 3, 2020; Complaint, In re LendEDU, FTC Docket No. C-4719; FTC, “The FTC’s TRUSTe Case: When Seals Help Seal the Deal,” Nov. 17, 2014; FTC, “Lord & Taylor Settles FTC Charges It Deceived Consumers Through Paid Article in Online Fashion Magazine and Paid Instagram Posts,” Mar. 15, 2016; FTC Enforcement Policy Statement on Deceptively Formatted Advertisements (2015).
9. FTC Policy Statement on Deception, appended to Matter of Cliffdale Associates, Inc., 103 F.T.C. 110, 174 (1984); FTC v. Colgate-Palmolive Co., 380 U.S. 374 (1965); POM Wonderful, LLC v. FTC, 777 F.3d 478 (D.C. Cir. 2015).
10. See U.S. Department of Commerce, International Trade Administration, U.S. Commercial Service Israel, describing Israel as a dynamic high-technology market with opportunities for U.S. exporters and a pro-American business community familiar with U.S. business norms; U.S. Department of Commerce, International Trade Administration, Israel Cybersecurity Strategy 2025: A Strategic Gateway for U.S. Companies, describing Israel’s cybersecurity innovation and opportunities for U.S. companies; Office of the United States Trade Representative, Israel, reporting that United States goods trade with Israel totaled approximately \$34.4 billion in 2025; Office of the United States Trade Representative, Israel Free Trade Agreement, explaining that the agreement entered into force in 1985, was the first free-trade agreement entered into by the United States, and continues to provide a foundation for bilateral trade and investment; 22 U.S.C. § 8606, authorizing United States-Israel cooperation in energy, water, homeland security, agriculture, and alternative fuel technologies; U.S. Department of the Treasury, Treasury Announces Cyber Security Cooperation with Israel, Aug. 25, 2022; U.S. Department of Energy, U.S.-Israel Energy Center Announces Funding Opportunity for Energy Infrastructure Cybersecurity, Aug. 14, 2020.

11. United States Department of State, Foreign Terrorist Organizations, identifying Hamas and Hezbollah as designated foreign terrorist organizations; United States Department of State, *Country Reports on Terrorism 2024* (Iran “remained the leading state sponsor of terrorism”; ongoing Iranian financial support allowed Hamas to continue operations), and *Country Reports on Terrorism 2023* (Iran designated a State Sponsor of Terrorism in 1984; Iran provides up to \$100 million annually in combined support to Palestinian terrorist groups, including Hamas), made available to U.S. consumers at <https://www.state.gov/reports/country-reports-on-terrorism-2024> and <https://www.state.gov/reports/country-reports-on-terrorism-2023>; United States Department of the Treasury, “Treasury Targets Covert Hamas Investment Network and Finance Official” (May 2022) (Hamas elements held about 75 percent of the issued capital of Turkey-based Trend GYO), <https://home.treasury.gov/news/press-releases/jy0798>; United States Department of the Treasury, “Following Terrorist Attack on Israel, Treasury Sanctions Hamas Operatives and Financial Facilitators,” Oct. 18, 2023 (sanctioning Hamas investment-portfolio operatives in Türkiye and “a Qatar-based financial facilitator with close ties to the Iranian regime”), <https://home.treasury.gov/news/press-releases/jy1816>; United States Department of the Treasury, “Treasury Targets Key Hamas Leaders and Financiers,” Nov. 19, 2024 (designating senior Hamas officials, including a Türkiye-based official who “facilitates the flow of funds from Türkiye into Gaza and the West Bank for Hamas”), <https://home.treasury.gov/news/press-releases/jy2720>; NPR, “Qatar Changes Plan, Decides to Use Money for Humanitarian Aid in Gaza, Not Hamas,” Feb. 4, 2019 (Qatari money “was used to help Hamas pay the salaries of workers in their government”), <https://www.npr.org/2019/02/04/691394276/qatar-changes-plan-decides-to-use-money-for-humanitarian-aid-in-gaza-not-hamas>; Reuters, “Hamas Unable to Pay Salaries in Gaza After Qatari Aid Delay,” July 16, 2023 (Hamas officials attributing unpaid public-sector salaries in part to a delay in Qatar’s monthly payroll grant); CNN, “Qatar Sent Millions to Gaza for Years,” Dec. 11, 2023 (reporting monthly Qatari payments into Gaza beginning in 2018, and Qatar’s position that the funds were aid for salaries and were not intended for Hamas), <https://www.cnn.com/2023/12/11/middleeast/qatar-hamas-funds-israel-backing-intl>; United States Department of State, Press Statement, “President Erdogan’s Meeting With Hamas Leadership,” Aug. 25, 2020 (“The United States strongly objects to Turkish President Erdogan hosting two Hamas leaders in Istanbul . . . [B]oth officials hosted by President Erdogan are Specially Designated Global Terrorists. . . . We continue to raise our concerns about the Turkish government’s relationship with Hamas at the highest levels.”), <https://2017-2021.state.gov/president-erdogans-meeting-with-hamas-leadership>; Reuters, “Turkey’s Erdogan Says Hamas Is ‘Liberation Group,’ Not Terrorists, Cancels Israel Visit,” Oct. 25, 2023 (quoting President Erdogan’s address to AK Party lawmakers); United States Department of the Treasury, “Treasury Disrupts Sham Overseas Charity Networks Funding Hamas and the PFLP” (June 2025) (designating Türkiye-based Filistin Vakfı, which “campaigns and raised funds with the clear intention of funding Hamas terrorist activities”), <https://home.treasury.gov/news/press-releases/sb0162>; United States Department of the Treasury, sanctions action of Mar. 12, 2026 (designating the

Turkey-based charities Ghazi Destek Dernegi, Hayat Yolu, and the Palestinian White Hands Assistance and Solidarity Association for providing material support to Hamas); United States Department of the Treasury, “Treasury Disrupts Muslim Brotherhood and Hamas Financial Networks,” July 23, 2026 (designating a Turkey-based Hamas money exchange), <https://home.treasury.gov/news/press-releases/sb0572>; Reuters, “Qatar Considers Future of Hamas Office in Doha, and Whether to Keep Mediating” (May 2024) (Qatar “has hosted Hamas’ political leaders since 2012 as part of an agreement with the U.S.”).

- 11a. BBC StoryWorks, “Discover Culture in Qatar,” *infra* note 70 (labeled “#Ad paid and presented by Visit Qatar”); *infra* notes 71–72 (Qatar Airways inflight partnership; Amnesty International criticism); BBC StoryWorks, “Ancient ruins, chic resorts and magical landscapes of Türkiye” (BBC StoryWorks YouTube channel) (labeled “#Ad paid and presented by GoTürkiye”), https://www.youtube.com/watch?v=cuZ2_2sb_-s; Daily Sabah, “Türkiye Rewrites Tourism with Story-Driven Mini-Series” (Minister of Culture and Tourism describing the TGA’s development of the GoTürkiye brand), <https://www.dailysabah.com/arts/cinema/turkiye-rewrites-tourism-with-story-driven-mini-series>; Native Advertising Institute, “How BBC StoryWorks Reframed Türkiye’s Global Image Through a Multi-Platform Travel Campaign” (case study: “Colours of Türkiye”; brand, Türkiye Tourism; studio, BBC StoryWorks), <https://www.nativeadvertisinginstitute.com/cases/colours-turkiye>; Türkiye Tourism Promotion and Development Agency (TGA), “About Us” (agency established July 15, 2019 as a related entity of the Ministry of Culture and Tourism, with its Board of Directors chaired by the Deputy Minister of Culture and Tourism), <https://tga.gov.tr/en/about-us>; Press Gazette, *infra* note 90 (BBC World Service spokesperson: “We accepted some limitations on this occasion in order to provide our audiences with rare insights from inside the country”).
12. Federal Trade Commission, [ReportFraud.ftc.gov](https://www.ftc.gov/report-fraud); Federal Trade Commission, The Community Advocate Center on [ReportFraud.ftc.gov](https://www.ftc.gov/report-fraud); Federal Trade Commission, Bureau of Consumer Protection.
13. BBC Group, Annual Report and Accounts 2024/25, identifying BBC Studios, including BBC Global News, BritBox, and other commercial subsidiaries, and listing BBC Global News Limited, BBC Global News Holdings Limited, BBC Global News US LLC, BBC News USA Inc., and BBC Studios Americas Incorporated among BBC Group entities; *see also* BBC Group, *Annual Report and Accounts 2025/26* (June 29, 2026; presented to Parliament July 14, 2026), Commercial operations and Notes to the accounts; BBC Studios, “Our Global Office Locations,” identifying BBC Studios Americas Inc. at 1120 Avenue of the Americas, New York, New York; Companies House, BBC Global News Limited, Company No. 04514407, current company and filing records, available online at <https://find-and-update.company-information.service.gov.uk/company/04514407>. Each BBC Group Annual Report is made available to U.S. consumers online at bbc.co.uk/annualreport and on GOV.UK: <https://www.gov.uk/government/publications/bbc-group-annual-report-and-accounts-for-2025-to-2026> (2025/26) and

<https://www.gov.uk/government/publications/bbc-group-annual-report-and-accounts-for-2024-to-2025> (2024/25).

14. BBC Group, Annual Report and Accounts 2024/25, Commercial Board Report, stating that the company encompasses the BBC Group’s commercial operations, of which BBC Studios is the principal commercial arm; *see also* BBC Group, *Annual Report and Accounts 2025/26* (June 29, 2026; presented to Parliament July 14, 2026), Commercial Board report and Strategic review—BBC Commercial; BBC, “Purpose and Structure,” describing BBC Studios as the BBC’s largest commercial operation. Made available to U.S. consumers online; *see supra* note 13.
15. BBC Group, Annual Report and Accounts 2024/25, Strategic Review—BBC Commercial; *see also* BBC Group, *Annual Report and Accounts 2025/26* (June 29, 2026; presented to Parliament July 14, 2026), Strategic review—BBC Commercial; BBC Studios, “Our Global Office Locations,” identifying BBC Studios Americas Inc. in New York and BBC Studios production operations in Los Angeles; BBC Studios Privacy Policy, identifying BBC Studios Americas Inc. as the United States contact entity. Made available to U.S. consumers online; *see supra* note 13.
16. BBC Group, Annual Report and Accounts 2024/25, identifying BBC Studios, including BBC Global News, as a principal commercial subsidiary; *see also* BBC Group, *Annual Report and Accounts 2025/26* (June 29, 2026; presented to Parliament July 14, 2026), Commercial operations; BBC Studios, “BBC News Commercial,” stating that, as a commercial arm of the BBC, it creates branded-content, sponsorship, and advertising partnerships; BBC Studios, “Contact BBC News Commercial,” stating that BBC Studios is responsible for the global commercial operations of BBC News. The BBC News commercial website is made available to U.S. advertisers and consumers at <https://bbcnews.bbcestudios.com/>; the Annual Reports are available as stated *supra* note 13.
17. BBC Group, Annual Report and Accounts 2024/25, Strategic Review—BBC Commercial, identifying BBC.com and the BBC app as key digital platforms for international audiences and stating that the BBC News Channel is streamed live through BBC.com in the United States; *see also* BBC Group, *Annual Report and Accounts 2025/26* (June 29, 2026; presented to Parliament July 14, 2026), Strategic review—BBC Commercial; BBC Studios Advertising; BBC Studios, 2025 North America Commercial Media Kit. Made available to U.S. consumers online; *see supra* note 13.
18. ITV plc, “ITV Sells Its 50% Share of BritBox International to BBC Studios,” March 1, 2024; BBC Group, Annual Report and Accounts 2024/25, reporting BritBox International’s first full year of BBC Studios ownership; *see also* BBC Group, *Annual Report and Accounts 2025/26* (June 29, 2026; presented to Parliament July 14, 2026), Strategic review—BBC Commercial; BritBox, current corporate press materials. Made available to U.S. consumers online; *see supra* note 13.
19. BBC Group, Annual Report and Accounts 2024/25, reporting that BBC Studios sold its 50.1% interest in New Video Channel America LLC, known as BBC America, to

AMC Networks in November 2024 and entered into a three-year brand-licensing agreement and a five-year content-licensing agreement; BBC Group, Annual Report and Accounts 2024/25, Notes to the Accounts, confirming disposal of the remaining BBC America interest on November 1, 2024. Made available to U.S. consumers online; see supra note 13.

20. BBC Group, Annual Report and Accounts 2024/25, Strategic Review—BBC Commercial and Notes to the Accounts, describing commercial revenue derived from media and streaming, content sales, consumer products, licensing, advertising, subscriptions, channels, and digital services; *see also* BBC Group, *Annual Report and Accounts 2025/26* (June 29, 2026; presented to Parliament July 14, 2026), Strategic review—BBC Commercial and Notes to the accounts. Made available to U.S. consumers online; see supra note 13.
21. BBC Studios, “BBC News Commercial”; BBC Studios, “Contact BBC News Commercial,” stating that BBC Studios is responsible for the global commercial operations of BBC News; BBC Studios Advertising. Made available to U.S. advertisers and consumers at <https://bbcnews.bbcstudios.com/>.
22. BBC Studios, “BBC Distribution,” stating that BBC Studios works with hundreds of partners worldwide to distribute BBC News through residential distribution, digital platforms, syndication, airlines, hotels, cruise ships, and other outlets, and describing BBC News as commercially available in more than 200 countries and territories; BBC Studios, “BBC News Commercial.” Made available to U.S. advertisers and consumers at <https://bbcnews.bbcstudios.com/>.
23. Royal Charter for the Continuance of the British Broadcasting Corporation (Dec. 2016), arts. 4–6, stating that the BBC’s mission is to serve audiences through “impartial, high-quality and distinctive output and services” and requiring duly accurate and impartial news, current-affairs, and factual programming meeting the highest editorial standards; Ofcom Broadcasting Code, Section Five, Rules 5.1–5.2. The Royal Charter is published by the UK Government on GOV.UK (www.gov.uk/government/publications) and is made available to U.S. consumers online.
24. BBC, Editorial Guidelines, Section 1, Editorial Standards, identifying trust as the foundation of the BBC and independence, impartiality, honesty, and the highest standards of due accuracy as fundamental values; BBC, Editorial Guidelines, Section 3, Accuracy; BBC, Editorial Guidelines, Section 4, Impartiality.
- 24a. BBC, Editorial Guidelines, published at bbc.co.uk/editorialguidelines and made available to U.S. consumers online; Royal Charter, supra note 23; BBC Group, Annual Report and Accounts 2024/25, supra note 17 (BBC.com and the BBC app serve international audiences seeking “trusted, impartial BBC news”); BBC Group, *Annual Report and Accounts 2025/26* (June 29, 2026; presented to Parliament July 14, 2026), 2025/26 highlights and “Pursue truth with no agenda” (promoting BBC journalism as “Pursue truth with no agenda. Independent, fearless and fair,” and describing the BBC’s “commitment to impartial, accurate and trusted news and

information” as “our promise to the UK and audiences worldwide”); see *supra* note 13 (availability).

25. Asa Briggs, *The History of Broadcasting in the United Kingdom*, wartime volumes addressing the BBC’s wartime broadcasting functions; Simon J. Potter, *Broadcasting Empire: The BBC and the British World*; Oxford History of the British Empire, “Propaganda and War, 1939–1945,” describing the BBC as a central means of distributing official information and propaganda, supporting morale, encouraging resistance, cementing relations with allies, and conducting psychological warfare; House of Commons Foreign Affairs Committee materials recording that most BBC European language services were established during the Second World War.
26. House of Commons Foreign Affairs Committee, *The Implications of Cuts to the BBC World Service*, 2011, describing Foreign Office grant-in-aid funding and the joint role of the BBC and Foreign Secretary in language-service decisions; House of Commons Foreign Affairs Committee, *The Future of the BBC World Service*, 2014, describing the Foreign Office funding relationship as permitting “discreet influence” and identifying the World Service as an instrument of soft power.
27. House of Commons Committee of Public Accounts, *BBC World Service*, Seventy-Second Report of Session 2024–26, HC 1299 (Mar. 13, 2026), Summary; Conclusion 1 (the World Service “remains a core instrument of UK soft power”); ¶ 3 (FCDO provided £137 million in 2025–2026, with £221 million from the licence fee); ¶ 17 (in return for FCDO funding, the BBC may not close entire language services without the Foreign Secretary’s agreement and must agree annual objectives, priorities, and targets against which it reports each year), made available to U.S. consumers at <https://publications.parliament.uk/pa/cm5901/cmselect/cmpubacc/1299/report.html>; Foreign, Commonwealth and Development Office, “New Funding Agreed to Keep BBC World Service on Air,” Mar. 13, 2023.
- 27a. Committee of Public Accounts, *supra* note 27, ¶ 6 (BBC evidence that the World Service is a vital instrument of UK soft power, “a unique and precious UK strategic asset,” and that the United Kingdom should be spending double the amount on it given state-backed rivals) (citing Oral Evidence, Jan. 8, 2026, Q 7 (Tim Davie, Director-General; Jonathan Munro; Fiona Crack)); *id.*, Conclusion 1 (trust comparisons with Chinese and Russian state broadcasters); *id.*, Conclusion 2 (comparing the World Service with the U.S. Agency for Global Media, “an independent federal agency that provided similar content globally to the World Service”); BBC Group, *Annual Report and Accounts 2025/26* (June 29, 2026; presented to Parliament July 14, 2026), 2025/26 highlights (“The BBC is carrying the UK’s voice, values, and influence to a weekly audience of 502 million people worldwide”), Royal Charter review (the World Service “is therefore not just cultural or diplomatic: it is a critical piece of national security infrastructure”; proposal to increase the BBC’s reach in trusted news worldwide “as part of a new era for UK security, trade and influence”), and Delivering our creative remit (fifth Public Purpose: “To reflect the United Kingdom, its culture and values to the world”); Department for Culture, Media and Sport, “Government Announces Preferred

Candidate for BBC Chair” (GOV.UK) (quoting Dr. Samir Shah: the BBC is “one of our strongest calling cards on soft power”); see Exhibit E, §§ II–IV; see *supra* note 13 (availability).

28. Trevor Asserson with RIME Data Science, *The Asserson Report: The Israel-Hamas War and the BBC*, Sept. 2024, stating that the analysis evaluated BBC English- and Arabic-language output by reference to the BBC’s legal and editorial obligations and reporting more than 1,500 alleged breaches; see Exhibit G.
29. *Sugar v. British Broadcasting Corporation*, [2012] UKSC 4, concerning the BBC’s commissioned Balen review of the quality and impartiality of Middle East coverage; Michael Prescott, memorandum concerning BBC editorial standards and BBC Arabic, as described in Exhibit F; Ofcom, “Ofcom Investigation Finds BBC Gaza Documentary in Breach of Broadcasting Code,” Oct. 17, 2025, finding that failure to disclose that the narrator’s father held a position in the Hamas-run administration was materially misleading and deprived the audience of critical information; Ofcom, *Broadcast and On Demand Bulletin, Gaza: How to Survive a Warzone*; BBC Group, *Annual Report and Accounts 2025/26* (June 29, 2026; presented to Parliament July 14, 2026), Statement from the Chairman (acknowledging “the breach of our Editorial Guidelines by *Gaza: How to Survive a Warzone*”); see also Committee Report, *supra* note 5a, ¶ 11.
30. Federal Trade Commission, *Policy Statement Regarding Advertising Substantiation*, stating that objective claims expressly or impliedly represent that the advertiser possesses a reasonable basis supporting them; Federal Trade Commission, *Policy Statement on Deception*; *Cliffdale Associates, Inc.*, 103 F.T.C. 110, 164–84 (1984); *Pfizer, Inc.*, 81 F.T.C. 23, 62–64 (1972).
31. Federal Trade Commission, *Policy Statement on Deception*, appended to *Matter of Cliffdale Associates, Inc.*, 103 F.T.C. 110, 174–84 (1984); *FTC v. Colgate-Palmolive Co.*, 380 U.S. 374, 386–92 (1965); *POM Wonderful, LLC v. FTC*, 777 F.3d 478, 490–91 (D.C. Cir. 2015).
32. *In re LendEDU, et al.*, FTC File No. 182-3180, Complaint and Decision and Order (2020), alleging that respondents falsely represented that their financial-product information, ratings, and rankings were “objective,” “accurate,” and “unbiased” and were unaffected by compensation, although advertisers received higher rankings and placements based on payment; Federal Trade Commission, “Operators of Comparison Shopping Website Agree to Settle FTC Charges Alleging Deceptive Rankings and Fake Reviews,” Feb. 3, 2020.
- 32a. *In re Inside Publications, LLC*, FTC File No. 172-3067, Complaint and Decision and Order (2018); Federal Trade Commission, “PR Firm and Publisher Settle FTC Allegations They Misrepresented Product Endorsements as Independent Opinions, Commercial Advertising as Editorial Content,” Nov. 13, 2018; see also *In re Creaxion Corp.*, FTC File No. 172-3066 (2018) (companion case, same facts).

33. *True Ultimate Standards Everywhere, Inc. (TRUSTe)*, FTC File No. 132-3219, Docket No. C-4512, Complaint and Decision and Order (2014–2015), alleging that TRUSTe failed on more than 1,000 occasions to conduct annual recertifications promised through its privacy-seal program; *Made in the USA Brand, LLC*, FTC File No. 142-3121, Docket No. C-4497, Complaint and Decision and Order (2014).
34. See Section V, and Exhibits E, F, and G, including British governmental, Foreign Office, parliamentary, archival, and funding materials; *Sugar v. British Broadcasting Corporation*, [2012] UKSC 4, concerning the BBC’s commissioned Balen review of the quality and impartiality of Middle East coverage; Trevor Asserson with RIME Data Science, *The Asserson Report: The Israel-Hamas War and the BBC*, Sept. 2024; Michael Prescott, memorandum concerning BBC editorial standards and BBC Arabic; Ofcom, *Gaza: How to Survive a Warzone*, Broadcast and On Demand Bulletin and related decision, Oct. 17, 2025.
35. See Sections VII through IX and the accompanying Exhibits, documenting the Complaint’s allegations concerning Gaza reporting, Hamas-linked or Hamas-controlled sources, BBC Arabic and BBC Persian terminology, Iranian and IRGC-associated narratives, Hezbollah and Lebanon coverage, civilian displacement, source affiliations, corrections, and differences among BBC language services. See also United States Department of State, Country Reports on Terrorism: Iran; United States Department of the Treasury materials concerning Iranian support for Hamas and Hezbollah; United Nations Security Council reporting concerning Hezbollah activity and implementation of Resolution 1701.
36. *FTC v. Colgate-Palmolive Co.*, 380 U.S. 374, 386–92 (1965); *POM Wonderful, LLC v. FTC*, 777 F.3d 478, 490–505 (D.C. Cir. 2015); Federal Trade Commission, Policy Statement Regarding Advertising Substantiation, appended to *Thompson Medical Co.*, 104 F.T.C. 648, 839–42 (1984).
37. BBC Studios, “BBC News Commercial”; BBC Studios, 2025 North America Commercial Media Kit; BBC Studios Advertising, describing the commercial use of BBC audience trust and reputation to generate advertising, sponsorship, and branded-content revenue.
38. FTC Policy Statement on Deception, appended to *Matter of Cliffdale Associates, Inc.*, 103 F.T.C. 110, 174–84 (1984); Section V.
39. BBC Royal Charter, 1927; Asa Briggs, *The History of Broadcasting in the United Kingdom*, Vol. I, *The Birth of Broadcasting* (1961), documenting John Reith’s role as founding General Manager and first Director-General and his promotion of impartiality and public service as defining broadcasting principles.
40. Asa Briggs, *The History of Broadcasting in the United Kingdom*, Vol. I, *The Birth of Broadcasting* (1961), documenting the BBC’s restriction of opposition and labor access during the 1926 General Strike and Reith’s private acknowledgment that the Government trusted the BBC to avoid genuine impartiality; Simon J. Potter, *Broadcasting Empire: The BBC and the British World*, describing BBC wartime

overseas broadcasting within British information and foreign-policy structures; see Exhibit B (Ward, Jordan, and Kushner findings concerning antisemitic influence on wartime BBC reporting of the Holocaust).

41. *FTC v. Gill*, 265 F.3d 944, 956–58 (9th Cir. 2001); *United States v. W.T. Grant Co.*, 345 U.S. 629, 633 (1953).
42. *FTC v. Grant Connect, LLC*, 763 F.3d 1094 (9th Cir. 2014) (appeal of defendant Kyle R. Kimoto); *FTC v. Stefanchik*, 559 F.3d 924, 928–29 (9th Cir. 2009).
43. See Exhibit B, compiling the Ward, Jordan, and Kushner findings and related archival and academic evidence concerning the BBC’s wartime and Holocaust-era reporting record.
44. Stephen Ward, “Why the BBC Ignored the Holocaust: Anti-Semitism in the Top Ranks of Broadcasting and Foreign Office Staff Led to the News Being Suppressed,” *The Independent*, Aug. 22, 1993; see Exhibit B.
45. James Jordan, “Beyond the Cesspit Beneath: The BBC and the Holocaust,” in *British Culture and the Holocaust* (2021); see Exhibit B.
46. Tony Kushner, *The Persistence of Prejudice: Antisemitism in British Society During the Second World War* (Manchester University Press 1989); Tony Kushner, *The Holocaust and the Liberal Imagination: A Social and Cultural History* (Blackwell 1994); see Exhibit B.
47. International Holocaust Remembrance Alliance, “Working Definition of Antisemitism”; see Exhibit B.
48. FTC Policy Statement on Deception, appended to *Matter of Cliffdale Associates, Inc.*, 103 F.T.C. 110, 174–84 (1984); see Exhibit B.
49. BBC Breakfast, BBC News Channel, BBC Radio 4 Today, and related BBC Holocaust Memorial Day broadcasts, Jan. 27, 2026, using formulations including “six million people” and “six million mostly Jewish people”; BBC correction and apology acknowledging that the wording should have identified the six million Jewish victims; see Exhibit B.
50. *FTC v. Cyberspace.com LLC*, 453 F.3d 1196, 1200–01 (9th Cir. 2006) (“A solicitation may be likely to mislead by virtue of the net impression it creates even though the solicitation also contains truthful disclosures.”); Federal Trade Commission, Policy Statement on Deception, appended to *Matter of Cliffdale Associates, Inc.*, 103 F.T.C. 110, 174–84 (1984).
51. Stephen Ward, “Why the BBC Ignored the Holocaust,” note 44; James Jordan, “Beyond the Cesspit Beneath,” note 45; Tony Kushner, *The Persistence of Prejudice*, note 46; see Section VII.A and Exhibit B.

- 51a. United States Holocaust Memorial Museum, materials documenting Iranian state sponsorship of Holocaust denial, distortion, and antisemitic propaganda; see Section VIII.C.
52. BBC Arabic report describing Hezbollah as “the Islamic resistance” following attacks on Israel and subsequent amendment or removal of that terminology; BBC Monitoring, Mar. 1, 2026, reporting the IRGC claim that Iranian strikes had killed or wounded “560 American soldiers”; see Exhibit I and Sections VIII.C and IX.
53. BBC, The Repair Shop, Dec. 2025, Kindertransport segment and subsequent BBC apology concerning the omission of Jewish identity; BBC promotional material for One Life and its subsequent amendment following criticism; see Exhibit B.
54. Ofcom, BBC News Online and BBC London News, Broadcast and On Demand Bulletin, Issue 461, Nov. 7, 2022, finding failures of due accuracy and due impartiality arising from the BBC’s treatment of disputed audio from the antisemitic attack and its delay in amending the online article; Ofcom, “Ofcom Concludes Investigation into the BBC’s Coverage of Antisemitic Attack,” Nov. 7, 2022.
55. Federal Trade Commission Act § 5(a), 15 U.S.C. § 45(a); Federal Trade Commission, Policy Statement on Deception, appended to *Cliffdale Associates, Inc.*, 103 F.T.C. 110, 174–84 (1984); *FTC v. Cyberspace.com LLC*, 453 F.3d 1196, 1200–01 (9th Cir. 2006); *FTC v. Stefanchik*, 559 F.3d 924, 928–29 (9th Cir. 2009); *FTC v. OMICS Group Inc.*, 827 F. App’x 653 (9th Cir. 2020) (mem.); BBC Editorial Guidelines, §§ 3–4, Accuracy and Impartiality.
56. CAMERA UK, “BBC Arabic edits to AFP report omit 1941 pogrom, downplay persecution of Iraqi Jews,” Apr. 13, 2021.
57. U.N. Gen. Assembly Res. 181(II), Nov. 29, 1947.
58. Benny Morris, *1948: A History of the First Arab-Israeli War* 66–73, 396 (Yale Univ. Press 2008) (describing Arab opposition to partition before and after Resolution 181 and explaining that the Zionist movement, led by Ben-Gurion and Weizmann, accepted the November 29, 1947 partition proposal, while the Palestinian Arabs and the Arab states rejected it). See also United Nations Palestine Commission, Statement of the Arab Higher Committee for Palestine, U.N. Doc. A/AC.21/10 (Feb. 6, 1948) (stating that the Arabs of Palestine would “never recognise” the partition recommendation and were determined to oppose it).
59. *Bob Vylan broadcast breached BBC standards, investigation finds*, The Independent (2025); see also Committee Report, *supra* note 5a, ¶ 11.
- 59a. Deadline, “‘Gaza: How To Survive A Warzone’ Gets Hundreds of Complaints Amid BBC Investigation Into Hamas Links,” Mar. 2025 (quoting BBC Chairman Samir Shah).
60. *FTC v. Gill*, 265 F.3d 944, 956–58 (9th Cir. 2001); *United States v. W.T. Grant Co.*, 345 U.S. 629, 633 (1953); *Telebrands Corp. v. FTC*, 457 F.3d 354, 358–62 (4th Cir.

2006) (history of prior violations relevant to scope of relief); FTC Policy Statement Regarding Advertising Substantiation, appended to Thompson Medical Co., 104 F.T.C. 648, 839–42 (1984).

- 60a. FTC Policy Statement on Deception, appended to Cliffdale Associates, Inc., 103 F.T.C. 110, 177–79 (1984) (representations directed to a particular audience are evaluated from the perspective of a reasonable member of that group).
- 61. *FTC v. Freecom Communications, Inc.*, 401 F.3d 1192, 1202 (10th Cir. 2005) (intent to deceive not required); *FTC v. Amy Travel Service, Inc.*, 875 F.2d 564, 573–74 (7th Cir. 1989) (knowledge shown by actual knowledge of material misrepresentations, reckless indifference to their truth, or awareness of a high probability of fraud with intentional avoidance of the truth); *FTC v. Network Services Depot, Inc.*, 617 F.3d 1127, 1138–39 (9th Cir. 2010); FTC Policy Statement on Deception, appended to Cliffdale Associates, Inc., 103 F.T.C. 110, 174–84 (1984).
- 62. *FTC v. Amy Travel Service, Inc.*, 875 F.2d 564, 573–74 (7th Cir. 1989); *FTC v. Publishing Clearing House, Inc.*, 104 F.3d 1168, 1171 (9th Cir. 1997); *FTC v. Network Services Depot, Inc.*, 617 F.3d 1127, 1138–39 (9th Cir. 2010).
- 63. FTC Policy Statement on Deception, appended to Cliffdale Associates, Inc., 103 F.T.C. 110, 174–84 (1984); BBC Studios, “BBC News Commercial”; BBC Studios, 2025 North America Commercial Media Kit.
- 63a. U.S. Census Bureau, “Census Bureau Releases 2020 Census Data for Nearly 1,500 Detailed Race and Ethnicity Groups, Tribes and Villages,” Sept. 21, 2023 (3.5 million MENA respondents; Lebanese, Iranian, and Egyptian the largest groups); U.S. Census Bureau, “Lebanese, Iranian and Egyptian Populations Represented Nearly Half of the MENA Population in 2020 Census,” Sept. 21, 2023; Pew Research Center, “Political Polarization & Media Habits,” Oct. 21, 2014; see also note 119; Exhibit C, notes 172g–172i.
- 64. NBC News, “President Files \$10 Billion Defamation Lawsuit Against BBC Over January 6 Speech,” Dec. 15, 2025; CBS News, “Trump Files \$10B Defamation Lawsuit Against the BBC Over Editing of His Jan. 6 Speech in Documentary,” Dec. 15, 2025 (reporting BBC Chairman Samir Shah’s acknowledgment that the Panorama editing “gave the mistaken impression” of a “direct call for violent action” and was an “error of judgement”); see also Committee Report, *supra* note 5a, ¶¶ 11–12.
- 65. Order Granting Leave to Amend, *Trump v. British Broadcasting Corp.*, No. 1:25-cv-25894 (S.D. Fla. Aug. 2026); Tampa Free Press, “Federal Judge in Florida Allows Trump to Amend \$10 Billion Lawsuit Against the BBC,” Aug. 10, 2026 (quoting plaintiff’s filing: BBC data reflect at least 34 successful play starts attributed to Florida and contemporaneous notice that geoblocking was failing); Deadline, “Donald Trump Waging \$10B Legal War Against BBC on Basis ‘Doctored’ Documentary May Have Been Viewed 285 Times in America,” Aug. 2026

(deposition testimony of BBC director of digital distribution: about 570,000 iPlayer streams, about 285 from IP addresses possibly in the United States); TheWrap, “BBC Files New Motion to Dismiss Trump’s \$10 Billion Lawsuit, Citing VPN Issue,” Aug. 2026.

66. DeSmog / The Guardian, “BBC Under Fire for Producing Paid ‘Propaganda’ for Saudi Arabia,” Mar. 30, 2026.
67. Id. (Saudi Aramco gas-output expansion and emissions data).
68. Joey Shea, Saudi Arabia researcher, Human Rights Watch, quoted in DeSmog / The Guardian, “BBC Under Fire for Producing Paid ‘Propaganda’ for Saudi Arabia,” Mar. 30, 2026.
69. FTC Policy Statement on Deception, appended to Cliffdale Associates, Inc., 103 F.T.C. 110, 174–84 (1984).
70. BBC StoryWorks, “Discover Culture in Qatar,” Visit Qatar campaign (labeled “#Ad paid and presented by Visit Qatar”).
71. Aircraft Interiors International, “BBC Studios Renews Inflight Entertainment Content Partnership with Qatar Airways,” June 5, 2024.
72. The Independent, “Amnesty Hits Out at BBC for ‘Uncritical’ Videos Advertising Qatar Ahead of World Cup,” Oct. 5, 2022.
73. Deadline, “The BBC Is Making Money Producing Glossy Tourism Ads For China’s Propaganda Machine,” Dec. 21, 2022 (reporting BBC Studios advertising revenue of approximately £294 million / \$360 million).
74. Deadline, “The BBC Is Making Money Producing Glossy Tourism Ads For China’s Propaganda Machine,” Dec. 21, 2022 (reporting internal BBC journalist objections to StoryWorks’ authoritarian-state client relationships and the BBC statement that commercial work is “entirely separate” from journalism).
75. Gulf News / Al Jazeera, reporting on the 2015 detention of BBC correspondent Mark Lobel by Qatari authorities.
76. U.S. Department of Education, Foreign Gift and Contract Report Portal, Jan. 2026; JNS, “Qatar Is Biggest Foreign Funder of US Colleges, per Education Department,” Jan. 9, 2026.
77. House Committee on Education and the Workforce, How Campuses Became Hotbeds: The Rise of Radical Antisemitism on College Campuses, Mar. 2026; Hussein Aboubakr Mansour, Higher Influence: How Qatar Pulls the Strings on American Campuses, JINSA Gemunder Center for Defense and Strategy, June 2026.
78. Hussein Aboubakr Mansour, Higher Influence: How Qatar Pulls the Strings on American Campuses, JINSA Gemunder Center for Defense and Strategy, June 2026,

Section II.E (Al Jazeera); Wiley Rein LLP, “DOJ Directs U.S. Affiliate of Qatari-Owned Al Jazeera to Register as Foreign Agent,” Sept. 2020.

79. Deadline, “The BBC Is Making Money Producing Glossy Tourism Ads For China’s Propaganda Machine,” Dec. 21, 2022 (quoting the BBC position that its commercial work is “entirely separate” from journalism).
80. FTC Policy Statement on Deception, appended to Cliffdale Associates, Inc., 103 F.T.C. 110, 182–83 (1984); Kraft, Inc. v. FTC, 970 F.2d 311, 322–23 (7th Cir. 1992).
81. BakerHostetler, “FCC’s New Foreign Sponsorship Rules Go into Effect – Stations Should Review Agreements Carefully for Compliance,” Mar. 2022 (grouping BBC with Al Jazeera, France 24, and Deutsche Welle).
82. Wiley Rein LLP, “DOJ Directs U.S. Affiliate of Qatari-Owned Al Jazeera to Register as Foreign Agent,” Sept. 2020.
83. BBC StoryWorks, “Discover Culture in Qatar,” Visit Qatar campaign; Aircraft Interiors International, “BBC Studios Renews Inflight Entertainment Content Partnership with Qatar Airways,” June 5, 2024.
84. Deadline, “The BBC Is Making Money Producing Glossy Tourism Ads For China’s Propaganda Machine,” Dec. 21, 2022 (quoting the BBC position that its commercial work is “entirely separate” from journalism).
85. FTC Policy Statement Regarding Advertising Substantiation, appended to Thompson Medical Co., 104 F.T.C. 648, 839–42 (1984); Pfizer, Inc., 81 F.T.C. 23, 62–64 (1972).
86. FTC Policy Statement on Deception, appended to Cliffdale Associates, Inc., 103 F.T.C. 110, 174–84 (1984).
87. 16 C.F.R. Part 255; FTC Policy Statement on Deception, appended to Cliffdale Associates, Inc., 103 F.T.C. 110, 174–84 (1984); In re Sponsorship Identification Requirements for Foreign Government-Provided Programming, Report and Order, 86 Fed. Reg. 32221 (June 17, 2021); Second Report and Order, FCC 24-61 (June 10, 2024); 47 U.S.C. § 317.
88. House of Commons Foreign Affairs Committee, The Future of the BBC World Service, 2014; House of Commons Committee of Public Accounts, BBC World Service, Mar. 13, 2026; see Exhibit I.
89. House of Commons and BBC World Service materials concerning threats, intimidation, surveillance, and access restrictions directed at BBC Persian journalists and operations; see Exhibit I.
90. Press Gazette, “BBC ‘Undermined’ Persian Service with Iran Access Deal Preventing It from Using Footage, Says NUJ,” Sept. 30, 2022, including BBC World Service spokesperson statement.

91. Sadeq Saba quoted in The Times, reported via Religion Unplugged, “How Western News Outlets Are Letting Iranians Down,” May 2026.
92. Marvin Kalb & Carol Saivetz, “The Israeli-Hezbollah War of 2006: The Media as a Weapon in Asymmetrical Conflict,” Shorenstein Center on the Press, Politics and Public Policy, Harvard Kennedy School, Research Paper R-29 (Feb. 2007) (prepared for the Brookings Institution’s U.S.-Islamic World Forum, Doha, Feb. 2007), published at 12 Harv. Int’l J. Press/Politics 43 (2007) (“BBC coverage generally tipped against Israel, perhaps in response to public opinion”).
93. CAMERA UK, “The BBC’s Hezbollah Explainer — An Exercise in Narrative Laundering,” Mar. 22, 2026.
94. CAMERA, “BBC Coverage of Beirut Funerals Perpetuates the Narrative,” Apr. 1, 2026.
95. U.S. Department of the Treasury, “U.S. Designates Al-Manar as a Specially Designated Global Terrorist Entity,” Mar. 2006; NPR, “N.Y. Man Charged with Aiding Hezbollah TV Channel,” Aug. 27, 2006.
96. CAMERA UK, “BBC News Once Again Promotes ‘Targeting Journalists’ Narrative,” Apr. 2026; CAMERA, “BBC Coverage of Beirut Funerals Perpetuates the Narrative,” Apr. 1, 2026.
- 96a. CAMERA UK, “Another BBC News Hizballah Media Tour Report,” Mar. 10, 2026 (discussing BBC News report filed from Nabi Chit, Lebanon, Mar. 7, 2026), <https://camera-uk.org/2026/03/10/another-bbc-news-hizballah-media-tour-report/>.
97. BBC Monitoring, Mar. 1, 2026, reporting the IRGC claim that Iranian strikes had killed or wounded 560 American soldiers; see Exhibit I.
98. U.S. Department of the Treasury, “Treasury Sanctions Iranian Officials and Companies Connected to Repression in Advance of the Anniversary of Mahsa ‘Zhina’ Amini’s Death,” Sept. 15, 2023 (designating “three IRGC and regime-controlled media outlets — Fars News, Tasnim News and Press TV” and noting that IRIB “was designated by the United States in 2013 for participating in censorship”), <https://home.treasury.gov/news/press-releases/jy1733>; U.S. Department of the Treasury, “Treasury Sanctions Senior Officials and ‘Interrogator Journalists’ of Iran’s State-Run Media,” <https://home.treasury.gov/news/press-releases/jy1109>; see Exhibit I.
99. House of Commons Committee of Public Accounts, BBC World Service, Mar. 13, 2026 (£137 million FCDO funding for 2025–2026); see Section V.
100. BBC Monitoring, Mar. 1, 2026; Press Gazette, Sept. 30, 2022; CAMERA UK, Mar.–Apr. 2026; FTC Policy Statement on Deception, appended to Cliffdale Associates, Inc., 103 F.T.C. 110, 174–84 (1984); see Exhibit I.

101. Stephen Ward, “Why the BBC Ignored the Holocaust,” *The Independent*, Aug. 22, 1993; James Jordan, “Beyond the Cesspit Beneath: The BBC and the Holocaust,” in *British Culture and the Holocaust* (2021); Tony Kushner, *The Persistence of Prejudice: Antisemitism in British Society During the Second World War* (Manchester University Press 1989); see Exhibit B.
102. House of Commons Committee of Public Accounts, BBC World Service, Mar. 13, 2026 (£137 million FCDO funding for 2025–2026); see Section V.
103. Deadline, “The BBC Is Making Money Producing Glossy Tourism Ads For China’s Propaganda Machine,” Dec. 21, 2022 (BBC Studios advertising revenue); BBC Studios commercial materials described in Sections III and VIII.
104. BBC Press Office, “Matt Brittin Appointed BBC Director-General,” Mar. 2026; Associated Press and *The Guardian* coverage of the appointment described in Section III.
105. FTC Policy Statement on Deception, appended to *Cliffdale Associates, Inc.*, 103 F.T.C. 110, 174–84 (1984).
- 105a. 15 U.S.C. § 45(a)(1)–(2); *Shop Tutors, Inc.*, d/b/a LendEDU, FTC Docket No. C-4719 (2020) (publisher of comparison rankings); *Legacy Learning Systems, Inc.*, FTC File No. 102-3055 (2011).
- 105b. FTC Policy Statement on Deception, appended to *Cliffdale Associates, Inc.*, 103 F.T.C. 110, 174–76, 182 (1984); *Kraft, Inc. v. FTC*, 970 F.2d 311, 314, 322 (7th Cir. 1992); *Novartis Corp. v. FTC*, 223 F.3d 783, 786–87 (D.C. Cir. 2000) (express claims presumed material).
106. *FTC v. Colgate-Palmolive Co.*, 380 U.S. 374, 386–92 (1965); FTC Policy Statement on Deception, appended to *Cliffdale Associates, Inc.*, 103 F.T.C. 110, 174–84 (1984).
107. FTC Policy Statement Regarding Advertising Substantiation, appended to *Thompson Medical Co.*, 104 F.T.C. 648, 839–42 (1984); *Pfizer, Inc.*, 81 F.T.C. 23, 62–64 (1972); BBC Studios, 2025 North America Commercial Media Kit.
108. *In re Int’l Harvester Co.*, 104 F.T.C. 949, 1057–58 (1984); *FTC v. QT, Inc.*, 512 F.3d 858, 861–63 (7th Cir. 2008); *FTC v. Commerce Planet, Inc.*, 878 F. Supp. 2d 1048, 1075–76 (C.D. Cal. 2012).
109. *FTC v. Colgate-Palmolive Co.*, 380 U.S. 374, 386–92 (1965); *FTC v. Cyberspace.com LLC*, 453 F.3d 1196, 1200–02 (9th Cir. 2006); *POM Wonderful, LLC v. FTC*, 777 F.3d 478, 490–505 (D.C. Cir. 2015).
110. FTC Policy Statement on Deception, appended to *Cliffdale Associates, Inc.*, 103 F.T.C. 110, 176–84 (1984); *FTC v. Colgate-Palmolive Co.*, 380 U.S. 374, 386–92 (1965); *FTC v. Cyberspace.com LLC*, 453 F.3d 1196, 1200–02 (9th Cir. 2006).

111. FTC Policy Statement on Deception, appended to Cliffdale Associates, Inc., 103 F.T.C. 110, 174–84 (1984); *Kraft, Inc. v. FTC*, 970 F.2d 311, 322–23 (7th Cir. 1992).
112. FTC Policy Statement on Deception, appended to Cliffdale Associates, Inc., 103 F.T.C. 110, 182 (1984); *Kraft, Inc. v. FTC*, 970 F.2d 311, 322–23 (7th Cir. 1992).
113. BBC Global News, Brand Finance partner page, describing the BBC as “the world’s most trusted international news broadcaster” and stating that BBC Global News works with brands to create sponsorship, advertising, and branded-content partnerships; FTC Enforcement Policy Statement on Deceptively Formatted Advertisements, Dec. 22, 2015.
114. FTC Policy Statement on Deception, appended to Cliffdale Associates, Inc., 103 F.T.C. 110, 182 (1984); *Kraft, Inc. v. FTC*, 970 F.2d 311, 322–23 (7th Cir. 1992).
115. Legacy Learning Systems, Inc., FTC File No. 102-3055 (Sept. 20, 2011); Machinima, Inc., FTC File No. 142-3090 (Sept. 2, 2015); Warner Bros. Home Entertainment, Inc., FTC File No. 152-3034 (July 11, 2016); Lord & Taylor, LLC, FTC File No. 152-3181 (Mar. 15, 2016).
116. *FTC v. Colgate-Palmolive Co.*, 380 U.S. 374, 384–92 (1965); FTC Policy Statement on Deception, appended to Cliffdale Associates, Inc., 103 F.T.C. 110, 174–84 (1984).
117. FTC Policy Statement on Deception, appended to Cliffdale Associates, Inc., 103 F.T.C. 110, 174–84 (1984); *Kraft, Inc. v. FTC*, 970 F.2d 311, 322–23 (7th Cir. 1992).
118. BBC Global News, Brand Finance partner page, describing the BBC as “the world’s most trusted international news broadcaster” and linking that reputation to sponsorship, advertising, and branded-content partnerships.
119. Reuters Institute for the Study of Journalism, Digital News Report; Pew Research Center, News Media Tracker.
120. BBC Studios, 2025 North America Commercial Media Kit; BBC.com and BBC subscription and advertising materials described in Sections III and V.
121. BBC Studios, “BBC Distribution,” describing BBC News distribution through residential distributors, digital platforms, syndication, airlines, hotels, cruise ships, and other outlets; see Section IV.C.
122. Legacy Learning Systems, Inc., FTC File No. 102-3055; Machinima, Inc., FTC File No. 142-3090; Warner Bros. Home Entertainment, Inc., FTC File No. 152-3034; Lord & Taylor, LLC, FTC File No. 152-3181.
123. *FTC v. Gill*, 265 F.3d 944, 956–58 (9th Cir. 2001); *FTC v. Grant Connect, LLC*, 763 F.3d 1094 (9th Cir. 2014) (appeal of defendant Kyle R. Kimoto); *United States v. W.T. Grant Co.*, 345 U.S. 629, 633 (1953).

124. *FTC v. Publishing Clearing House, Inc.*, 104 F.3d 1168, 1171 (9th Cir. 1997); *FTC v. Amy Travel Service, Inc.*, 875 F.2d 564, 573–74 (7th Cir. 1989); *FTC v. Gill*, 265 F.3d 944, 956–58 (9th Cir. 2001); *FTC v. Grant Connect, LLC*, 763 F.3d 1094 (9th Cir. 2014); *United States v. W.T. Grant Co.*, 345 U.S. 629, 633 (1953).
125. *Sugar v. British Broadcasting Corporation*, [2012] UKSC 4, [9]–[10], concerning the BBC’s commissioned Balen review; BBC materials concerning the Journalism Board’s consideration of the Balen review and subsequent Middle East coverage measures, as compiled in Exhibit F.
126. BBC corrections and apologies concerning Al-Ahli Hospital, Al-Shifa Hospital, the “summary executions” allegation, and Gaza aid-site reporting, as compiled in Exhibit A.
127. BBC and public-source materials concerning Jon Donnison’s 2012 Syria-photo apology, the 2012 Gaza child-death reporting and subsequent U.N. assessment, and the BBC’s Al-Ahli reporting, as compiled in Exhibit A; see also Exhibit F.
128. Hadar Sela, “BBC Complaints Refuses Clarification: Slain ‘First Responder’ Was Hamas Terrorist Who Carried Out Oct. 7 Atrocities,” CAMERA, May 6, 2026.
129. Ofcom, “Ofcom Investigation Finds BBC Gaza Documentary in Breach of Broadcasting Code,” Oct. 17, 2025; Ofcom, Broadcast and On Demand Bulletin, Gaza: How to Survive a Warzone; Reuters, “BBC’s Gaza Documentary Breached Accuracy Guideline, Review Finds,” July 14, 2025; see also Committee Report, *supra* note 5a, ¶ 11.
130. Trevor Asserson with RIME Data Science, The Asserson Report: The Israel-Hamas War and the BBC, Sept. 2024; Michael Prescott memorandum and Parliamentary materials concerning BBC editorial standards and BBC Arabic, as compiled in Exhibits F and G.
- 130a. Committee Report, *supra* note 5a, ¶ 11 (identifying *Gaza: How to Survive a Warzone*, the Bob Vylan Glastonbury broadcast, and the Panorama edit as “failures or lapses in the BBC’s editorial standards”), ¶ 12 (resignations of Tim Davie and Deborah Turness; President Trump’s defamation suit), ¶ 103 (stating the Committee will “wait to see how any future incidents are handled”; ten months without a permanent Head of News).
131. FTC Policy Statement on Deception; *FTC v. Colgate-Palmolive Co.*, 380 U.S. 374 (1965); *FTC v. Cyberspace.com LLC*, 453 F.3d 1196, 1200–02 (9th Cir. 2006); *Kraft, Inc. v. FTC*, 970 F.2d 311, 322–23 (7th Cir. 1992).
132. BBC Studios, “BBC Distribution”; BBC distribution and syndication materials described in Section IV.C.
133. FTC Policy Statement on Deception, appended to *Cliffdale Associates, Inc.*, 103 F.T.C. 110, 174–84 (1984); *FTC v. Colgate-Palmolive Co.*, 380 U.S. 374, 386–92 (1965).

134. *Miami Herald Publishing Co. v. Tornillo*, 418 U.S. 241 (1974); see Section X.D.
135. FTC, “FTC Staff Provides the FDA with Comments On First Amendment Commercial Speech Doctrine,” Sept. 20, 2002; *Central Hudson Gas & Electric Corp. v. Public Service Commission*, 447 U.S. 557 (1980).
136. *Bolger v. Youngs Drug Products Corp.*, 463 U.S. 60, 66–67 (1983).
137. BBC Studios, 2025 North America Commercial Media Kit; BBC Help Centre subscription marketing materials described in Sections III and IX.A.
138. BBC.com, BBC World News, BBC Select, and BBC subscription and advertising materials described in Sections III and V.
139. BBC subscription, advertising, licensing, and distribution revenue materials described in Sections I, III, and VIII.
140. *Virginia State Board of Pharmacy v. Virginia Citizens Consumer Council*, 425 U.S. 748 (1976); *Friedman v. Rogers*, 440 U.S. 1, 9–10 (1979); *44 Liquormart, Inc. v. Rhode Island*, 517 U.S. 484 (1996).
141. *Central Hudson Gas & Electric Corp. v. Public Service Commission*, 447 U.S. 557, 563–66 (1980).
142. *POM Wonderful, LLC v. FTC*, 777 F.3d 478 (D.C. Cir. 2015).
143. *Shop Tutors, Inc., d/b/a LendEDU*, FTC File No. 182-3180, Docket No. C-4719 (2020); *True Ultimate Standards Everywhere, Inc. (TRUSTe)*, FTC File No. 132-3219, Docket No. C-4512 (2015); *Legacy Learning Systems, Inc.*, FTC File No. 102-3055; *Machinima, Inc.*, FTC File No. 142-3090; *Lord & Taylor, LLC*, FTC File No. 152-3181; *Warner Bros. Home Entertainment, Inc.*, FTC File No. 152-3034.
144. *Miami Herald Publishing Co. v. Tornillo*, 418 U.S. 241, 258 (1974).
145. *Zauderer v. Office of Disciplinary Counsel*, 471 U.S. 626, 638, 651 (1985).
146. *In re R.M.J.*, 455 U.S. 191, 203 (1982); *Peel v. Attorney Registration & Disciplinary Comm’n*, 496 U.S. 91, 110 (1990) (plurality opinion); *Pearson v. Shalala*, 164 F.3d 650, 657–58 (D.C. Cir. 1999).

EXHIBITS TO COMPLAINT

Israel Media Monitor LLC v. British Broadcasting Corporation, et al.

The following exhibits are incorporated herein by reference.

EXHIBIT A

CORROBORATED EVIDENCE OF BBC MISREPRESENTATIONS IN REPORTS OF THE 2023–2025 GAZA WAR

I. Overview

This Exhibit compiles corroborating evidence relating to the allegations concerning BBC reporting during the 2023–2025 Gaza war.

The materials summarized below include statements from former BBC officials, independent regulatory findings, quantitative media audits, media-monitoring reports, public BBC corrections, and public reporting concerning internal BBC editorial concerns. Collectively, these sources identify recurring concerns regarding verification failures, asymmetrical terminology, sourcing practices, omission of material context, and disparities between the BBC’s marketed claims of impartiality and the reporting practices identified during the relevant period.

Because this content was available through BBC.com, BBC World News, BBC Select, streaming platforms, mobile applications, podcasts, and rebroadcast distribution channels available in the United States, the matters summarized below are directly relevant to the Complaint’s allegations concerning representations made to U.S. consumers.

II. Danny Cohen and Former BBC Officials

Danny Cohen, former Director of Television at the BBC (2013–2015), co-authored the foreword to a 60-page report examining BBC coverage of the Israel-Hamas war, published together with Baroness Ruth Deech, a former BBC governor and member of the House of Lords, and based on research conducted by CAMERA UK and CAMERA Arabic.¹⁴⁷ In the foreword, Cohen and Deech wrote that while “honest mistakes” can happen in reporting, the mistakes identified in the report were “almost always in the anti-Israel direction,” concluding that “it would not be possible to compile a similar record of anti-Palestinian errors.” The report identified specific examples, including the BBC’s continued reluctance to characterize Hamas as a terrorist organization in its own reporting and its repetition of Hamas-linked casualty figures as verified fact.¹⁴⁷ It also cited an on-air BBC presenter’s speculation, before verification, that Israel caused the Al-Ahli hospital explosion; the BBC later admitted that the speculation was wrong, and the explosion was attributed to a misfired Palestinian rocket.¹⁴⁸

Cohen also criticized BBC reporting relating to Al-Shifa Hospital, where the BBC later issued a correction acknowledging inaccuracies in reports concerning Israeli conduct toward medical personnel and Arabic-speaking civilians.¹⁴⁹

Additional criticism followed BBC reporting concerning allegations of summary executions attributed to Israeli forces, where the BBC subsequently acknowledged insufficient verification procedures.¹⁵⁰

The significance of these statements is heightened because they came from a former senior BBC executive with direct knowledge of BBC editorial structures and practices.

III. Ofcom Findings

In 2025, Ofcom upheld complaints concerning a BBC documentary relating to Gaza after finding that viewers were not informed of a material connection between the documentary's narrator and a Hamas official.¹⁵¹

The ruling is significant because Ofcom is the United Kingdom's statutory communications regulator and is independent of both the BBC and organizations that have publicly criticized BBC coverage. Unlike commentators or advocacy groups, Ofcom possesses formal regulatory authority to investigate complaints and determine whether BBC content complied with applicable broadcasting standards.

The ruling therefore provides independent regulatory support for concerns regarding disclosure practices, transparency, and the accuracy of representations made to audiences concerning BBC content.¹⁵¹

IV. Trevor Asserson Quantitative Audit

In September 2024, British-Israeli attorney Trevor Asserson and a multidisciplinary research team released a quantitative audit of BBC coverage concerning the Israel-Hamas war. The study analyzed a substantial body of BBC English and Arabic output concerning the conflict between October 2023 and February 2024.¹⁵²

The report identified more than 1,500 alleged breaches of BBC editorial guidelines and concluded that BBC Arabic and portions of BBC English-language coverage demonstrated substantial asymmetry in terminology, sourcing, and framing relating to Israel and Hamas.

The Asserson audit further concluded that:

- Israel was associated with allegations of war crimes substantially more frequently than Hamas;
- BBC Arabic displayed materially different framing patterns than BBC English-language services; and
- corrections disproportionately involved content initially harmful to Israel.¹⁵²

Although the BBC publicly challenged aspects of the methodology, the corporation did not publicly release equivalent quantitative analysis substantiating its own marketed claims of impartiality.

V. BBC Verify and Verification Concerns

Public criticism was also directed toward BBC Verify, a BBC-branded fact-checking and verification initiative marketed as an independent transparency and authentication tool.¹⁵³

Critics argued that BBC Verify frequently relied upon casualty figures originating from institutions operating under Hamas authority while failing to provide sufficient disclosure concerning verification limitations and sourcing uncertainties.¹⁵³

Additional concerns were raised regarding documentary production practices and disclosure of potentially relevant affiliations involving contributors and sources connected to Gaza-related programming.¹⁵⁴

These concerns are relevant because BBC Verify was marketed to audiences, including U.S. consumers, as a specialized verification and transparency mechanism intended to enhance trust and reliability.

VI. CAMERA and BBC Arabic Findings

CAMERA and CAMERA-UK published multiple reports alleging systematic disparities in BBC terminology, headline framing, corrections practices, and BBC Arabic coverage during the Gaza war period.¹⁵⁵

These reports documented repeated instances in which BBC headlines and summaries allegedly conveyed impressions differing materially from the underlying facts described within the articles themselves. Additional analyses documented repeated disputes involving BBC Arabic terminology and allegations of asymmetrical language concerning Israel and Hamas.¹⁵⁵

These findings reach beyond isolated factual disputes. They support allegations described elsewhere in the Complaint concerning materially different editorial framing standards across BBC language services despite the BBC's representations of unified editorial standards and impartiality.

VII. David Collier Investigations

Investigative journalist David Collier published analyses concerning BBC Gaza documentary sourcing, BBC Arabic output, and alleged Hamas-linked narratives during the Gaza war period.¹⁵⁶

Collier's investigations focused particularly on disclosure of relevant affiliations involving BBC Gaza documentary participants and questions concerning sourcing, contributor vetting, and BBC Arabic editorial practices.¹⁵⁶

These investigations are relevant because they identify recurring allegations concerning omission of material contextual information and asymmetrical sourcing practices directly related to the Complaint's allegations concerning deceptive representations of impartiality and verification.

VIII. Independent Journalists and Commentators

Journalists and commentators across multiple publications also publicly criticized BBC reporting practices relating to Israel, Hamas, antisemitism, and the Gaza conflict.

Melanie Phillips summarized portions of the Asserson audit and argued that BBC reporting repeatedly amplified inaccurate or weakly verified allegations concerning Israel while minimizing Hamas-related conduct and antisemitic violence.¹⁵⁷

Stephen Pollard, former editor of The Jewish Chronicle, similarly criticized BBC coverage of Hamas, antisemitism, and Gaza-war reporting, arguing that these issues reflected broader editorial failures rather than isolated errors.¹⁵⁸

The significance of these commentaries lies in their convergence: experienced journalists, editors, and media observers repeatedly identified similar patterns concerning sourcing, terminology, asymmetry, and verification.

IX. Michael Prescott Memorandum

Public reporting in 2025 described portions of a confidential memorandum prepared by Michael Prescott, a former independent adviser to the BBC's Editorial Guidelines and Standards Committee.¹⁵⁹

According to published reporting, Prescott raised concerns regarding BBC Arabic output, terminology relating to Hamas and Hezbollah, treatment of Israeli and Palestinian suffering, and broader issues relating to editorial framing and impartiality. The reporting further described concerns regarding the handling of politically sensitive broadcasts and the consistency of BBC editorial standards.

The significance of the Prescott Memorandum is that it reflects concerns reportedly raised from within BBC editorial oversight structures rather than solely by outside critics, commentators, or advocacy organizations.

A more detailed discussion of the Prescott Memorandum, including relevant excerpts and analysis, is contained in Exhibit F, which is incorporated herein by reference.¹⁵⁹

X. Relevance to United States Consumers and Advertisers

Most of the criticism collected in this Exhibit originated in the United Kingdom: from a former BBC Director of Television and a former BBC governor, from the United Kingdom's statutory broadcast regulator, from an adviser to the BBC's own standards committee, and from British lawyers and journalists. Its relevance to this Complaint lies in the United States. The reporting it addresses was sold to U.S. consumers through BBC.com, the BBC News app, BBC World News, and the other channels described in Section III, under the same claims of impartiality and rigorous verification. Respondents make in the American market. The facts it records — corrections, apologies, a regulator's finding that viewers were materially misled, and repeated warnings from within the BBC's own editorial oversight — are the facts a U.S. subscriber would want before relying on BBC coverage of the Gaza war, and the facts a U.S. advertiser would want before paying to place its brand beside BBC news on the strength of the BBC's reputation for trust. Respondents hold this information and present the BBC to American consumers and advertisers as the world's most trusted international news broadcaster. The record in this Exhibit shows an institution whose reputation exceeds its conduct: a broadcaster that trades on the respectability of its name while its reporting on Israel and the Gaza war repeatedly falls below the standards that name promises. Under Section 5, a

seller that markets its reputation must disclose the facts that materially qualify it. (See Sections V, VII, and IX.)

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EXHIBIT B

BBC HISTORICAL DECEPTION: WARTIME NEWS SUPPRESSION AND THE “TRUST” BRANDING GAP

I. Overview

The BBC sells its history. Respondents market the BBC to U.S. consumers and advertisers as a uniquely trusted news institution whose reputation rests on its wartime record as an independent witness to world events. This Exhibit shows what that record contains: wartime suppression and minimization of the Holocaust, the routine removal of Jewish identity from its victims, and close alignment with British government policy. It then shows the same pattern in the BBC’s Holocaust Memorial Day broadcasts of January 2026.

Under Section 5, a seller that invokes its history as proof of a product attribute must disclose the history that materially qualifies the claim. The facts below are those facts.

II. Wartime Suppression and Minimization of Holocaust Reporting

By 1942–1944, the BBC and the British Government held substantial information on Nazi extermination policy, including gas chambers, extermination camps, and the mass murder of Jews across occupied Europe.^{160 161 162} The BBC repeatedly minimized, delayed, or generalized that reporting.

When Soviet forces liberated Majdanek in 1944, The New York Times and the wire services reported its gas chambers, crematoria, and mass killings.¹⁶³ BBC archival and governmental records show that the BBC minimized the same facts or gave them little prominence.¹⁶⁴ At the Foreign Office, officials questioned the reliability and significance of atrocity reports concerning Jews, including in a 1943 memorandum doubting reports of gas chambers.¹⁶⁵

III. Removal of Jewish Identity

Wartime BBC reporting routinely described Holocaust victims as “civilians,” “refugees,” or “victims of Nazi persecution,” leaving out that Jews were the principal targets of extermination.^{160 166 169} Tony Kushner documents how British institutions, including the BBC, folded the extermination of the Jews into a general story of civilian wartime hardship.^{169 170} Historians attribute that editorial approach in part to political sensitivities, concern for propaganda credibility, and concern about reaction in the Arab world.^{160 166 171}

IV. Relationship Between the BBC and British Government Wartime Policy

Wartime BBC broadcasting operated within a framework set by the British Government, the Ministry of Information, and the Foreign Office, including editorial influence tied to British interests in the Middle East.^{167 168 171 172} Respondents now market the BBC in the United States as independent of government while omitting that history.

V. The Same Pattern Today: Holocaust Memorial Day 2026

On January 27, 2026, Holocaust Memorial Day and the 81st anniversary of the liberation of Auschwitz, BBC Radio 4's Today programme, BBC Breakfast, and the BBC News Channel described the Holocaust as the murder of "six million people" by the Nazi regime, leaving out that the victims were Jews. A seven-minute BBC Breakfast report that day mentioned neither Jews nor antisemitism. After public criticism, the BBC published a correction acknowledging that the broadcasts should have referred to "six million Jewish people."^{172a 172b}

Lord Pickles, co-chairman of the UK Holocaust Memorial Foundation, called the omission "an unambiguous example of Holocaust distortion, which is a form of denial," and the chief executive of the Holocaust Educational Trust called it "hurtful, disrespectful, and wrong."^{172b} Deborah Lipstadt, former U.S. Special Envoy to Monitor and Combat Antisemitism, responding to this and to a BBC London report on the Battle of Cable Street that also left out Jews, described a pattern the BBC is perfecting: making Jews invisible.^{172c}

The broadcasts reach the U.S. market. Radio 4 streams worldwide through BBC Sounds, the BBC News channel has operated since 2023 as a single channel serving UK and international audiences, and the BBC published its correction on BBC.com, the site Respondents sell to U.S. subscribers. The Commission should determine the extent to which these broadcasts reached U.S. audiences. They matter there because a generation of Americans is learning this history with little grounding: in a 2020 national survey, 63 percent of American Millennials and Gen Z respondents did not know that six million Jews were murdered in the Holocaust, and 48 percent could not name a single concentration camp or ghetto.^{172d} For those listeners, a BBC account of the Holocaust without Jews, delivered under the brand of the world's most trusted broadcaster, is the history they receive.

Taken together with the wartime record, the result is consistent. When the subject is the Holocaust and its Jewish victims, the BBC minimizes: in 1944 it minimized the camps, and in 2026 it removed the Jews from the day set aside to remember them. In practical effect, the BBC is a minimizer of the Holocaust as a crime against the Jewish people. That practice aligns the BBC with governments it is paid by or depends on for access: Iran's government hosted an international conference in 2006 devoted to questioning the Holocaust, and Qatar's state broadcaster, Al Jazeera, suspended two journalists in 2019 after its AJ+ Arabic service published a video minimizing it.^{172e}

VI. Federal Precedent on Distortion of History

Federal law recognizes deliberate distortion of a people's history as a cognizable harm to the American audience. In *Serafyn v. FCC*, a Ukrainian-American viewer challenged a CBS license on the ground that *60 Minutes* had deliberately distorted the history and character of Ukrainians by portraying them as antisemitic. The D.C. Circuit held that the FCC had misapplied its own evidentiary standard in summarily denying the petition, and remanded.^{172f} The news-distortion policy governs broadcast licensees, and Respondents sell BBC news in the United States largely outside that licensing regime. The Commission's authority over deceptive commercial claims reaches that conduct. The principle carries over: Americans are entitled to protection from a news seller's distortion

of a people's history, and here the seller markets the BBC's history and impartiality as the reason to buy.

VII. Why the BBC's Impartiality Branding Should Be Barred in the United States

The BBC sells its history and impartiality to American consumers and advertisers as reasons to trust it. The record in this Exhibit runs from wartime suppression of the Holocaust to the removal of Jews from Holocaust Memorial Day in 2026, alongside paid and access relationships with governments whose state institutions have promoted Holocaust denial and distortion. A reasonable consumer would consider those facts important in deciding whether to rely on BBC reporting about Jews, Israel, and the Middle East, and a reasonable advertiser would consider them important in deciding whether to place its brand beside that reporting. Respondents hold those facts and market the BBC without them. That is a materially misleading net impression under Section 5, and it is why the Commission should bar Respondents from marketing BBC news in the United States as impartial. (See Sections VII and XI.)

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EXHIBIT C

HISTORICAL PATTERN OF BBC TERMINOLOGY, FRAMING, AND OMISSIONS CONCERNING JEWS, ANTISEMITISM, AND THE MIDDLE EAST

I. Overview

This Exhibit collects recurring examples, from the 1929 Hebron massacre to the BBC's December 2025 description of the First Intifada, in which BBC reporting softened anti-Jewish violence, omitted the history of Jews in the Middle East, or used terminology that conveyed a false symmetry between attackers and victims. Each example appeared in BBC output available to U.S. consumers through BBC.com, the BBC News app, BBC Arabic, or BBC World News, the products Respondents sell in the United States as impartial and historically reliable.

These omissions matter commercially. Pew Research Center finds that Americans know little about Judaism, and that those who know more about Judaism, or who know a Jewish person, hold markedly warmer views of Jews.^{172g 172h} Pew also reports that nine in ten American Jews believe discrimination against Jews has risen since the Israel–Hamas war began, and that roughly a quarter of American Jews and Muslims have stopped talking to someone over things said about the war.¹⁷²ⁱ A news seller that fills that knowledge gap with an account omitting the history of Jews in the Middle East deepens those divisions. It also affects consumer choice. Consumers are entitled to decline to buy from a seller whose record shows news distortion and recurring antisemitism, just as they are entitled to prefer goods made in the United States or by environmentally responsible companies, and the Supreme Court has long held that Section 5 protects such preferences whatever their basis.^{172j} Finally, BBC framing of Israel as the aggressor supplies the narrative that boycott, divestment, and sanctions campaigns use against Israeli goods and companies, commercial activity that Congress restricts where foreign governments direct it.^{172k} In effect, the BBC lends its brand to those campaigns while selling itself to Americans as impartial.

II. Farhud, Iraqi Jews, and Jewish Refugees from Arab Countries

BBC reporting on Iraqi Jews and Jewish refugees from Arab countries has repeatedly omitted the persecution that drove them out.

In 2007, CAMERA documented that a BBC News online article on Iraqi Jews, available to U.S. readers, was amended only after complaints that it had omitted the Farhud, the 1941 anti-Jewish pogrom in Baghdad, and had presented an overly benign picture of Jewish life in Iraq.¹⁷³

In 2021, CAMERA Arabic and CAMERA UK reported that BBC Arabic, which Respondents serve to U.S. consumers on BBC.com, edited an AFP report concerning Iraqi Jews in a manner that removed or downplayed key facts, including the Farhud pogrom, Iraq's role in the 1948 war against Israel, Iraqi Jews being forced to surrender nationality and property, and ongoing persecution of Jews in Iraq.¹⁷⁴

More than 800,000 Jews were displaced or expelled from Arab and Muslim-majority countries in the twentieth century, a displacement comparable in scale to the Palestinian refugee issue and far less known.^{175 176} Many of their descendants are Americans, and Arab Americans are part of BBC Arabic's U.S. audience. When BBC reporting emphasizes Palestinian displacement and omits Jewish displacement from Arab lands, U.S. consumers receive a one-sided account of the refugee question at the center of the conflict, from a seller that markets that account as impartial.

III. Hebron Massacre, Anti-Jewish Violence, and Al-Aqsa Incitement Narratives

The 1929 Hebron massacre is a foundational event in the history of anti-Jewish violence in Mandatory Palestine. Arab mobs murdered 67 Jews in Hebron, destroyed Jewish property, and effectively ended the city's ancient Jewish community until after 1967.¹⁷⁷

The massacre was preceded by false incitement alleging Jewish threats to Muslim holy sites, including Al-Aqsa. That pattern is historically significant because similar allegations concerning Jewish or Israeli threats to Al-Aqsa continue to recur in modern regional propaganda and have repeatedly been used to inflame violence.

Critics have documented BBC historical backgrounders and Middle East reporting describing such events as "riots," "clashes," or "intercommunal violence," where the facts show anti-Jewish pogroms and attacks on Jewish civilians.¹⁷⁸

These backgrounders sit on BBC.com, where U.S. readers, students, and teachers find them. Softening the history of anti-Jewish violence that predates the State of Israel leaves U.S. consumers with the misleading impression that violence in the region began as a response to modern Israeli policy, and that impression feeds the campaigns against Israeli commerce described in Section I.

IV. Partition, Rejectionism, and the Origins of the 1948 War

BBC historical summaries concerning the origins of the Arab-Israeli conflict have been criticized for insufficiently emphasizing that the Jewish Agency accepted the 1947 United Nations Partition Plan, while Arab political leadership and surrounding Arab states rejected it and initiated war after Israel's declaration of independence.^{179 180}

That omission shapes how U.S. consumers assign responsibility for the 1948 war and the refugee populations it created. The partition history is part of the history the BBC sells. An account that presents the conflict only as Palestinian dispossession, without Arab rejection of partition and the displacement of Jews from Arab lands, is incomplete in a way that matters to consumers choosing a news source on the Middle East.

V. Intifada Terminology and Recent BBC Correction

A recent example of disputed BBC terminology involved the First Intifada. In December 2025, BBC reporting described the First Intifada as a "largely unarmed and popular" uprising. The description drew criticism, including from former BBC Director of Television Danny Cohen, because it allegedly minimized violence during the uprising and failed to give audiences sufficient context regarding attacks against Israeli civilians.

The BBC later amended the wording, stating that the change was made to clarify the context of the term “intifada.”^{181 182}

The example shows the pattern continuing in current BBC News output sold to U.S. subscribers, and it bears directly on how Americans understand the “intifada” slogans heard at protests in the United States since October 7, 2023.

VI. Hezbollah, Iran-Backed Proxies, and Omission of Initiating Attacks

BBC reporting concerning Hezbollah, Iranian-backed proxy groups, and regional attacks on Israel has repeatedly been criticized for minimizing initiating attacks against Israeli civilians while foregrounding Israeli responses.

During the 2023–2025 period, media-monitoring organizations criticized BBC coverage for insufficiently contextualizing Hezbollah rocket attacks, the displacement of tens of thousands of Israelis from northern communities, the Majdal Shams attack that killed children, and Hezbollah’s use of civilian infrastructure.¹⁸³

Similarly, BBC reporting concerning Yemen-based Houthi attacks on Israel has been criticized for foregrounding Israeli or allied retaliatory strikes while omitting or minimizing the hundreds of missiles and drones launched by the Iranian-backed Houthi movement toward Israel and international shipping routes.¹⁸⁴

These omissions determine whether U.S. viewers and readers of BBC News understand Israeli military action as a response to initiating aggression or as unprovoked escalation, a question at the center of American public debate and of consumer and investor decisions concerning Israeli companies.

VII. Iran’s Role in Hamas, Hezbollah, and Regional Conflict

The BBC has also been criticized for insufficiently explaining Iran’s central role as financier, arms supplier, and strategic supporter of Hamas, Hezbollah, Palestinian Islamic Jihad, the Houthis, and other regional armed groups. U.S. Government and congressional sources have repeatedly described Iran as a leading state sponsor of terrorism and documented Iranian support for these organizations.^{185 186 187}

Where BBC reporting uses generalized terms such as “Iran-backed” without explaining the depth of Iranian financing, training, weapons supply, operational support, and strategic direction, audiences may receive an incomplete understanding of the regional conflict structure. This omission is particularly material when BBC coverage separately circulates Iranian-origin claims or narratives during active conflict, as described in the Complaint. U.S. consumers need that context most when U.S. forces are engaged against the same Iranian network.

VIII. Relevance to the Complaint

Taken together, these examples show a sustained pattern across a century of history and every BBC platform sold in the United States: softening of anti-Jewish violence, omission of the history of Jews in the Middle East, and asymmetrical terminology favoring those who attack Jews and Israel. That pattern is a record of news distortion and

recurring antisemitism, and Respondents keep it from the U.S. consumers and advertisers to whom they sell the BBC as impartial.

Section 5 leaves the BBC's politics to the BBC. It requires a seller that markets impartiality and historical reliability to U.S. consumers to disclose the facts that materially qualify those claims. Consumers may choose to avoid a news source with this record, and advertisers may choose to keep their brands away from it; the Supreme Court has held that the public is entitled to make those choices, for whatever reason, on accurate information.^{172j} A brand whose reporting supplies the narrative for commercial boycotts of Israel, while presenting itself as impartial, misleads the very consumers and businesses those boycotts target.^{172k} The Commission should bar Respondents from marketing BBC news in the United States as impartial. (See Sections VII, IX, and XI.)

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175. Lyn Julius, *Uprooted: How 3,000 Years of Jewish Civilization in the Arab World Vanished Overnight*
Publisher: Vallentine Mitchell
Date: 2018
176. Martin Gilbert, *In Ishmael's House: A History of Jews in Muslim Lands*
Publisher: Yale University Press
Date: 2010
177. Shaw Commission Report concerning the 1929 Hebron Massacre
Publisher: British Government / Shaw Commission
Date: 1930
178. CAMERA UK and HonestReporting analyses concerning BBC characterization of the Hebron massacre and anti-Jewish violence in Mandatory Palestine
Publisher: CAMERA UK / HonestReporting
Date: Various
179. David Matthews, *Israel and the Media*
Publisher: Routledge
Date: 2021
180. Robin Aitken, *Can We Trust the BBC?*
Publisher: Continuum
Date: 2007
181. BBC correction and amendment concerning description of the First Intifada as "largely unarmed"
Publisher: BBC News
Date: December 2025
182. Danny Cohen criticism concerning BBC First Intifada terminology and historical framing
Publisher: Jewish News and related reporting sources
Date: 2025
183. CAMERA UK analyses concerning BBC reporting on Hezbollah rocket attacks, Majdal Shams, and Israeli civilian displacement
Publisher: CAMERA UK
Date: 2024–2025
184. CAMERA UK analyses concerning BBC reporting on Houthi missile and drone attacks against Israel
Publisher: CAMERA UK
Date: 2024–2025
185. U.S. Department of State, *Country Reports on Terrorism*
Publisher: U.S. Department of State
Date: 2023–2025

186. Congressional Research Service, Iran's Foreign and Defense Policies
Publisher: Congressional Research Service
Date: 2023–2024
187. International Institute for Strategic Studies, Iran's Networks of Influence in the Middle East
Publisher: IISS
Date: Various

EXHIBIT D

COMMERCIAL SPONSORSHIP BY QATAR, SAUDI ARABIA, AND TURKEY, AND THE UNDISCLOSED CONFLICT OF INTEREST

I. Overview

This Exhibit documents the BBC's paid commercial relationships with state and state-linked entities of Qatar, Saudi Arabia, and Turkey, and the reporting-access arrangement it has accepted from Iran. BBC StoryWorks publishes its paid content on BBC channels outside the United Kingdom, including BBC.com in the United States, where BBC News reports on the same governments.^{209a}

The point is consumer and advertiser choice. A U.S. reader may choose a different subscription on learning that the BBC is paid to make glossy promotional films for Qatar, Saudi Arabia, and Turkey that leave out their human-rights records and their support for Hamas, and that it reports from Iran on terms set by Iran's government. A U.S. advertiser may decline to place its brand beside news produced by an organization paid by the Qatari state. Section 5 protects those choices, and Respondents withhold the information needed to make them.

II. Qatar Airways and BBC Commercial Sponsorship Relationships

BBC commercial divisions have maintained advertising, sponsorship, distribution, and promotional relationships with Qatar Airways, the state-owned flag carrier of Qatar.^{188 189}

Public reporting and BBC commercial materials indicate that BBC Studios and BBC Global News renewed and expanded commercial partnerships involving Qatar Airways content distribution and promotional arrangements during the same period in which BBC reporting extensively covered Hamas, Gaza, hostage negotiations, Iran, and regional conflicts involving Qatari diplomatic and political interests.^{190 191}

III. BBC StoryWorks, State-Branded Content, and Sponsored Narrative Partnerships

BBC StoryWorks, the BBC's commercial branded-content division, produces sponsored films, articles, digital campaigns, and documentary-style promotional content for governments, tourism authorities, sovereign wealth funds, corporations, and state-linked entities.^{188 192}

BBC commercial materials describe these productions as "programme partnerships," branded storytelling, and commercial content designed to combine sponsor messaging with BBC-style documentary production techniques and audience-engagement strategies that benefit from the BBC's longstanding reputation for credibility and trust.^{188 192}

BBC StoryWorks publicly states that it builds upon the BBC's "century-long pedigree" as "the world's most trusted storytellers" in creating branded commercial content for sponsors and institutional partners.¹⁹²

BBC StoryWorks publicly promotes its ability to leverage the BBC's reputation, audience trust, editorial heritage, and storytelling credibility in support of sponsor-funded

campaigns. The commercial value of such arrangements derives precisely from public association with the BBC brand and the trust historically attached to that brand. Consequently, information concerning the identity of sponsors and the nature of commercial relationships may be material to consumer evaluation of BBC claims regarding independence, impartiality, and freedom from external influence.

Public examples include promotional campaigns produced for Visit Qatar and Qatar Tourism presenting Qatar as a luxury tourism, culture, wellness, and business destination through cinematic documentary-style productions distributed under BBC StoryWorks branding.^{201 202 203}

BBC StoryWorks also produced a series of paid films for Saudi Arabia's Public Investment Fund, chaired by Crown Prince Mohammed bin Salman, promoting the Kingdom's environmental initiatives, tourism, and "women's empowerment" while leaving out its fossil-fuel expansion, the continued imprisonment of activists, and its human-rights record.^{194 195}

Human-rights advocates and former BBC journalists describe this work as state propaganda that trades on the BBC's reputation.^{193 194 195} The BBC answers that StoryWorks operates "entirely separately" from BBC editorial operations and that its output is "clearly labelled as commercial content."^{209a} The label identifies a particular film as an advertisement. The reader of BBC News coverage of the same government receives no such notice.

IV. Parliamentary and Public Policy Relevance

Commercialization of BBC international services, including BBC.com subscriptions, BBC StoryWorks operations, and BBC-branded commercial partnerships, has been discussed in materials submitted to the British Parliament's Culture, Media and Sport Committee.¹⁹⁶

Parliamentary materials and related public commentary have also recognized that BBC international broadcasting operations possess substantial influence over international audiences and policymakers and function as an important component of broader national and international soft-power structures.¹⁹⁷

These materials are relevant because they demonstrate that commercialization, sponsored content, audience monetization, and BBC-branded narrative partnerships form part of a broader BBC international commercial strategy directed at global audiences, including consumers in the United States.

V. Materiality and Consumer Disclosure Concerns

The material issue raised by these relationships is whether the BBC may simultaneously market itself to U.S. consumers as uniquely impartial, independent, and free from external influence while failing adequately to disclose commercial relationships materially relevant to audience evaluation of neutrality and independence.

Reasonable consumers may evaluate BBC claims of trustworthiness, neutrality, and editorial independence differently if informed that:

- BBC commercial divisions maintain financial relationships with state-linked entities directly implicated in regional conflicts covered by BBC reporting;
- BBC-branded commercial storytelling has been used for state-sponsored narrative and promotional campaigns; and
- BBC reporting concerning Hamas, Hezbollah, Iran, Qatar, Saudi Arabia, and related geopolitical conflicts occurs within the context of broader BBC commercial relationships involving regional state actors.

Sponsorship and branded content are lawful. The deception lies in marketing BBC news as impartial and free of outside influence while keeping these paying relationships from the consumers of that news.

VI. Qatar, State-Linked Media Networks, and Regional Influence Structures

Qatar's international aviation, media, investment, educational, and public-relations activities operate within a broader state-linked soft-power structure that includes Qatar Airways, Al Jazeera Media Network, Qatar Foundation, sovereign investment entities, and related institutions.^{199 200}

Public reporting, congressional materials, think-tank analyses, and policy commentary have repeatedly examined Qatar's use of international media partnerships, university funding, lobbying, sports investments, tourism promotion, and global branding initiatives to shape public narratives concerning the Middle East, Hamas, Israel, and related geopolitical issues.^{199 200}

The public record shows that BBC commercial divisions monetized the BBC's reputation for neutrality through valuable relationships with state-linked entities that have substantial stakes in conflicts BBC journalism covers. Whether those relationships have influenced BBC editorial content is a question for the Commission's investigation; the nondisclosure is established now.

VII. Turkey and BBC News Türkçe

BBC StoryWorks produced the "Colours of Türkiye" campaign, labeled "#Ad paid and presented by GoTürkiye," the brand of the Türkiye Tourism Promotion and Development Agency, an entity of Turkey's Ministry of Culture and Tourism. (See Complaint, Sections IV.A and VIII.D and note 11a.) Turkey's President has called Hamas a liberation movement and has said that Turkey "firmly backs" its leaders.^{209c}

BBC News reports on the same government in English and through BBC News Türkçe, the BBC World Service's Turkish-language service.^{209b} U.S. consumers reach BBC News Türkçe at bbc.com/turkce, through the BBC News app, and on the BBC's Turkish-language social-media and video channels. BBC.com is funded in the United States by advertising and by paid subscriptions sold in the United States and Canada, and BBC Studios separately sells the BBC's U.S. digital audience to American advertisers. (See Complaint, Section III.) BBC News Türkçe therefore operates within the same commercial enterprise Respondents market to U.S. consumers and advertisers as impartial.

The BBC's presence in Turkey also depends on the Turkish government, which in March 2025 detained BBC correspondent Mark Lowen for 17 hours and deported him as a "threat to public order" while he covered protests in Istanbul.^{209d}

VIII. Foreign-Language Services and the Distortion Gap

The BBC's foreign-language services are where its distortions concentrate and where English-speaking consumers, advertisers, and regulators are least able to see them. The Asserson audit and the Prescott memorandum found BBC Arabic diverging from BBC English in terminology and framing (see Exhibits A and F); BBC Arabic adopted Hezbollah's own self-description (see Complaint, Section II.B); BBC Persian operates under restrictions the BBC accepted from Iran's government (see Complaint, Section VIII.C); and in September 2026 the BBC opened a review after an investigation identified 53 people whom BBC Arabic described as journalists and who allegedly had links to Hamas and other terrorist groups.^{209e} BBC News Türkçe serves an audience in a country whose government hosts Hamas leaders and pays BBC StoryWorks. The same structure, a paying or access-granting government covered in a language most of the BBC's U.S. advertisers cannot read, warrants the same scrutiny.

IX. The Duty to Disclose a Conflict of Interest

Federal law requires disclosure of exactly this kind of relationship. The Commission's Endorsement Guides require clear and conspicuous disclosure of any connection between a content source and a paying party that might materially affect the weight or credibility consumers give the content. Congress has required broadcasters since 1934 to announce when program matter is paid for or furnished by another party. The Commission's policy on deceptively formatted advertising treats undisclosed sponsorship of news-style content as deceptive. And the courts have long held that failure to disclose a material fact is itself deceptive under Section 5, and that consumers are entitled to choose the source of what they buy.^{209f} Respondents disclose StoryWorks sponsorship on the advertisement itself and keep it out of the news coverage of the sponsoring governments. That is the nondisclosure Section 5 prohibits.

X. Conclusion

A reasonable consumer would consider these relationships important in deciding whether to rely on BBC reporting about Hamas, Israel, Iran, Qatar, Saudi Arabia, and Turkey, and a reasonable advertiser would consider them important in deciding whether to buy space beside it.

Congressional investigations, academic studies, and public policy analyses have repeatedly described Qatar's use of media investment, university funding, lobbying, sports sponsorship, and international branding initiatives as components of a broader state soft-power and influence strategy directed at Western institutions and public discourse.²⁰⁴

205 206 207 208 209

As noted in congressional and policy materials, foreign funding relationships may create both actual and perceived influence over institutions shaping public discourse, particularly where transparency and disclosure are incomplete.²⁰⁴ Public-policy analyses

have further observed that Qatar has invested heavily in institutions capable of shaping elite opinion, media narratives, and public understanding in the West.^{206 207 208 209}

Against that background, Respondents' undisclosed paid relationships with Qatari, Saudi, and Turkish state entities, and their access arrangement with Iran, make their U.S. marketing of the BBC as impartial and free from outside influence materially misleading, and the Commission should bar that marketing. (See Complaint, Sections VIII and XI.)

Sources (Exhibit D)

188. BBC StoryWorks, Programme Partnerships and Commercial Storytelling Materials.
Publisher: BBC StoryWorks.
URL: <https://www.bbcstoryworks.com>
189. BBC Global News Advertising and Commercial Partnerships Materials.
Publisher: BBC Global News.
URL: <https://www.bbcglobalnews.com>
190. "BBC Studios Renews Qatar Airways Deal."
Publisher: Advanced Television.
Date: May 29, 2024.
191. "BBC Studios Renews IFE Content Partnership with Qatar Airways."
Publisher: Aircraft Interiors International.
Date: June 5, 2024.
192. BBC StoryWorks Commercial Productions and Programme Partnerships.
Publisher: BBC StoryWorks.
URL: <https://www.bbcstoryworks.com>
193. "BBC's Qatar-Funded Advertorials Risk Blurring Journalism and Fundraising."
Publisher: The Independent (reporting criticism by Amnesty International UK).
Date: October 2022.
194. "BBC Accused of Making 'Propaganda' Films for Saudi Sovereign Wealth Fund."
Publisher: The Guardian.
Date: March 30, 2026.
195. "BBC Under Fire for Producing Paid 'Propaganda' for Saudi Arabia."
Publisher: DeSmog.
Date: March 30, 2026.
196. Written Evidence Concerning BBC World Service Commercialization and BBC StoryWorks.
Publisher: British Parliament, Culture, Media and Sport Committee.
Date: 2024.
197. Parliamentary Debate Concerning BBC World News and International Broadcasting as Instruments of National Influence and Soft Power.

- Publisher: UK Parliament (Hansard).
Date: May 20, 2008.
198. Reporting and Commentary Concerning Branded Content, Native Advertising, Sponsored Storytelling, and Editorial-Commercial Separation.
Publisher: Columbia Journalism Review.
URL: <https://www.cjr.org>
199. Congressional Research Service Reports Concerning Qatar and Hamas Relationships.
Publisher: Congressional Research Service.
Dates: Various.
200. Public Reporting Concerning Hamas Political Leadership Presence in Qatar and Qatar's Gaza Financing Role.
Publishers: Reuters, Wall Street Journal, Times of Israel, and related reporting sources.
Dates: Various.
201. "Discover Adventure in Qatar."
Publishers: BBC StoryWorks; Visit Qatar.
Date: 2024.
202. "Discover Wellness in Qatar."
Publishers: BBC StoryWorks; Visit Qatar.
Date: 2024.
203. Qatar Tourism Campaign Materials Produced Through BBC StoryWorks Programme Partnerships.
Publishers: BBC StoryWorks; Visit Qatar.
Dates: 2023–2024.
204. "Transparency and Trust: Exposing Malign Foreign Influence in Higher Education."
Publisher: U.S. Senate Committee on Health, Education, Labor, and Pensions.
Date: March 12, 2026.
205. Foreign Gifts and Contracts Report Data.
Publisher: U.S. Department of Education.
Dates: Accessed 2025–2026.
206. The Corruption of the American Mind.
Publisher: Network Contagion Research Institute.
Date: 2024.
207. "The Qatari Regime, Hamas and the Muslim Brotherhood: The Globalization of Antisemitism and Anti-Democracy" and "Hijacking Higher Education, Qatar, The Muslim Brotherhood, and Texas A&M."

- Publisher: Institute for the Study of Global Antisemitism and Policy (ISGAP).
Date: 2023.
208. Qatar's Influence in Higher Education in the United States.
Publisher: Foundation for Defense of Democracies.
Date: 2024.
209. How Qatar Bought America's Universities.
Publisher: The Free Press.
Date: 2024.
- 209a. DeSmog, “BBC Under Fire for Producing Paid ‘Propaganda’ for Saudi Arabia,” Mar. 30, 2026 (StoryWorks content is published “on BBC channels outside the UK”), <https://www.desmog.com/2026/03/30/bbc-under-fire-for-producing-paid-propaganda-for-saudi-arabia/>; DeSmog, “BBC Accused of Doing PR for Major Polluters,” Aug. 22, 2024 (BBC StoryWorks spokesperson: the studio “operates entirely separately from the BBC’s editorial operations” and its output “is clearly labelled as commercial content”), <https://www.desmog.com/2024/08/22/bbc-storyworks-pr-greenwashing-major-polluters/>.
- 209b. BBC News Türkçe, BBC World Service Turkish-language service, <https://www.bbc.com/turkce>.
- 209c. AFP, “Erdogan Says Turkiye Firmly Backs Hamas Leaders,” Mar. 9, 2024 (“No-one can make us qualify Hamas as a terrorist organisation.”); see Complaint, note 11.
- 209d. Reporting on the detention and deportation of BBC correspondent Mark Lowen by Turkish authorities, Mar. 2025, including SpecialEurasia, “Erdogan in the Crosshairs,” Apr. 12, 2025, <https://www.specialeurasia.com/2025/04/12/erdogan-turkey-crisis/>.
- 209e. Jewish News, “BBC Reviews Gaza ‘Journalists’ After Terror Links Claims,” Sept. 2026 (reporting The Telegraph’s investigation), <https://jewishnews.co.uk/bbc-reviews-gaza-journalists-after-terror-links-claims>.
- 209f. 16 C.F.R. § 255.5 (Endorsement Guides: disclosure of material connections); 47 U.S.C. § 317 (sponsorship identification); FTC, Enforcement Policy Statement on Deceptively Formatted Advertisements (Dec. 22, 2015); J.B. Williams Co. v. FTC, 381 F.2d 884, 889–91 (6th Cir. 1967); Simeon Management Corp. v. FTC, 579 F.2d 1137, 1145 (9th Cir. 1978); FTC v. Royal Milling Co., 288 U.S. 212, 216 (1933).

EXHIBIT E

MATERIAL OMISSIONS CONCERNING BBC GOVERNANCE, GOVERNMENT FUNDING, AND CLAIMS OF INDEPENDENCE

I. Overview

Respondents sell BBC news in the United States as independent of government. The BBC is an institution of the British state. It exists under a Royal Charter and a Framework Agreement with the Government; the Government appoints its Chair and several Board members; and the Foreign Secretary agrees the objectives, priorities, targets, and languages of the World Service, which produces BBC Arabic, BBC Persian, and BBC News Türkçe for audiences that include U.S. consumers. On October 1, 2026, Parliament's Digital, Culture, Media and Sport Committee described the World Service as the United Kingdom's leading soft-power asset.^{210a} A U.S. consumer or advertiser deciding whether to rely on BBC news about the Middle East would consider these facts important. Respondents omit them.

II. Charter and Governance

The BBC operates under a Royal Charter and a Framework Agreement with the Secretary of State for Culture, Media and Sport, both granted, renewed, and amended through the Government, most recently in December 2025.^{210 210b} The Chair and the members for the four nations are appointed on ministerial recommendation. The Committee's October 2026 report recommended ending political appointments to the BBC Board and making the Charter permanent, concluding that the ten-year renewal cycle gives Government an opening for political interference.^{210a} Respondents omit these facts from their U.S. marketing.

III. The World Service and the Foreign Office

Under the Framework Agreement, the BBC agrees the World Service's objectives, priorities, targets, and languages with the Foreign Secretary, and the BBC Chair and the Foreign Secretary meet at least annually to review its performance against them.^{210b} In 2025/26 the World Service cost £234 million, of which £137 million came from the Foreign, Commonwealth and Development Office.^{210a 211 212}

The BBC told the Government in its 2026 Charter Review submission that the World Service is "a critical piece of national security infrastructure"; the Prime Minister told Parliament's Liaison Committee that protecting it is "a matter of national security"; and the Committee recommended that the Government take back its full funding.^{210a 213} The Framework Agreement also affirms the BBC's editorial independence. For U.S. consumers, the material fact is that the department that makes British foreign policy also funds the World Service and sets its objectives, and the World Service reports on that policy in English, Arabic, Persian, and Turkish.

IV. British Policy on Israel and the Palestinians

The same department led the United Kingdom's recognition of a Palestinian state in September 2025 and states British policy that Israeli settlements in the West Bank are

illegal under international law.^{214a} It is also the department whose officials, during the Second World War, doubted and discounted reports of the murder of Jews (see Exhibit B). The Foreign Office and the BBC remain intertwined through funding, agreed objectives, and annual review, and that relationship is a further example of state influence that belies the BBC's claim of impartiality. Given the Foreign Office's history and the record of institutional antisemitism described in this Complaint, the relationship warrants investigation, including whether the Foreign Office has communicated with the BBC about coverage of Israel and the Palestinians.

Federal law treats foreign-government influence over content as information the American audience is entitled to have. The FCC requires broadcasters to disclose programming furnished by a foreign governmental entity, 47 C.F.R. § 73.1212(j), and the Foreign Agents Registration Act requires agents of foreign principals to label informational materials they distribute in the United States, 22 U.S.C. § 614(b). Those statutes reflect the judgment Section 5 applies here: a reasonable U.S. consumer would consider a foreign government's funding of, and objective-setting for, a news service material in deciding whether to rely on it.

History shows that this channel has been used. During the Second World War, BBC overseas broadcasting operated under Ministry of Information and Foreign Office direction, including on the Middle East (see Exhibit B). Respondents now rely on that wartime reputation to sell the BBC as independent.

V. Withheld Internal Reviews

The BBC litigated for years, through the UK Supreme Court, to keep the Balen Report on its Middle East coverage from the public, and the Prescott memorandum on its editorial standards, including BBC Arabic, became public only through a leak in 2025.²¹⁴ (See Exhibit F.) A seller that markets transparency and accountability while withholding its own reviews of the subject in dispute leaves consumers with an incomplete impression.

VI. Relevance to U.S. Consumers and Advertisers

Respondents sell BBC.com, BBC World News, BBC Select, BBC podcasts, and BBC programming carried on U.S. public television as independent and impartial. A reasonable consumer would want to know that the BBC is chartered, partly governed, and partly funded by the British Government; that the Foreign Office sets objectives for its foreign-language services; and that Parliament itself recommends ending political appointments to its Board. A reasonable advertiser would want to know the same before buying space beside BBC coverage of British foreign policy. Section 5 requires disclosure of facts that materially qualify a seller's claims, and federal law requires disclosure of the party funding content (see Exhibit D, Section IX and note 209f).

VII. Conclusion

Respondents' omission of the BBC's relationship with the British Government renders their U.S. claims of independence materially misleading. The Commission should require disclosure of that relationship and examine, in its investigation, whether the Foreign

Office has communicated with the BBC about coverage of Israel, the Palestinians, and the Middle East.

Sources (Exhibit E)

- 210. BBC Royal Charter and Framework Agreement.
Publisher: British Government; British Broadcasting Corporation.
Current Charter and Framework Agreement in force.
- 211. BBC World Service Annual Review and Foreign, Commonwealth and Development Office Funding Materials.
Publishers: BBC World Service; UK Government.
Dates: 2024–2025.
- 212. UK Official Development Assistance Funding Materials Concerning BBC World Service Expansion and Counter-Disinformation Programming.
Publisher: UK Government.
Dates: 2024–2025.
- 213. Parliamentary Debates and Governmental Statements Describing the BBC World Service as an Instrument of British Soft Power and International Influence.
Publisher: UK Parliament (Hansard).
Dates: Various parliamentary sessions.
- 214. *Sugar v. British Broadcasting Corporation* [2012] UKSC 4.
Publisher: Supreme Court of the United Kingdom.
Date: February 15, 2012.

210a. House of Commons Digital, Culture, Media and Sport Committee, BBC Royal Charter Review, Fourth Report of Session 2026–27, HC 140 (Oct. 1, 2026), <https://publications.parliament.uk/pa/cm5902/cmselect/cmcumeds/140/report.html> (World Service cost £234 million in 2025/26 and received £137 million from the FCDO; BBC response to the Green Paper; Prime Minister’s evidence to the Liaison Committee; recommendations that the Government take back full World Service funding, that the Charter be made permanent, and that political appointments to the BBC Board end).

210b. Agreement Between the Secretary of State for Culture, Media and Sport and the BBC, Cm 9366 (Dec. 2016), cls. 33, 35, as amended by Updates to the BBC Framework Agreement, CP 1460 (Dec. 2025); GOV.UK, BBC World Service (“The Foreign Secretary is responsible for agreeing objectives, priorities and targets with the BBC World Service.”), <https://www.gov.uk/government/organisations/bbc-world-service>.

214a. Prime Minister’s Office, statement on the United Kingdom’s recognition of the State of Palestine, Sept. 21, 2025; FCDO, “Five Outposts to Be Legalised in West Bank: FCDO Statement,” June 30, 2024, <https://www.gov.uk/government/news/five-outposts-to-be-legalised-in-west-bank-fcdo-statement>.

See also Exhibit F (Prescott Memorandum and Related Materials).

EXHIBIT F

THE PRESCOTT MEMORANDUM: INTERNAL BBC FINDINGS CONCERNING IMPARTIALITY, EDITORIAL STANDARDS, AND MATERIAL OMISSIONS

I. Overview

Michael Prescott, an independent adviser to the BBC's Editorial Guidelines and Standards Committee, sent the BBC Board a 19-page memorandum summarizing internal reviews of BBC output prepared by the BBC's own senior editorial adviser, David Grossman. The Daily Telegraph published it in November 2025.²¹⁵ Parliament's Culture, Media and Sport Committee then published the memorandum on November 10, 2025, with the BBC Chair's response, and took evidence from Prescott on November 24, 2025.^{221a 221b}

The memorandum bears directly on U.S. consumers. Its first subject is the BBC's coverage of a United States presidential election and its edit of a United States President's speech. Its most extensive subject is BBC Arabic, which Respondents serve to U.S. consumers on BBC.com. Within days of its publication, the BBC's Director-General and the Chief Executive of BBC News resigned. (See Exhibit I, Section I.)

II. U.S. Election Coverage and the Trump Edit

The memorandum reported internal findings that the *Panorama* documentary *Trump: A Second Chance?*, broadcast a week before the 2024 U.S. election, spliced together parts of President Trump's January 6, 2021 speech delivered almost an hour apart, creating the impression of a direct call for violence; that BBC election coverage drew contributors overwhelmingly from Trump critics; and that the BBC repeatedly truncated remarks about Liz Cheney in a way that changed their meaning.²¹⁷ The BBC's Chairman later acknowledged that the edit gave "the mistaken impression" of "a direct call for violent action." (See Complaint, Section VII.D and note 64.)

President Trump has since sued the BBC in federal court in Florida, including under Florida's Deceptive and Unfair Trade Practices Act, a U.S. consumer-protection statute, and the extent of the documentary's U.S. viewing is now a disputed issue in that case. (See Complaint, note 65.) A misleading edit of an American President's words, made in coverage of an American election, is a matter of direct concern to American consumers of BBC news.

III. Race, Gender, and Verification

The memorandum also reported internal findings that BBC reporting, including BBC Verify, accepted contested claims of racial discrimination in insurance pricing and employment without adequate scrutiny, and that BBC coverage of sex and gender presented disputed propositions as settled while giving little coverage to dissenting views.^{218 219} These findings show the same institutional pattern across subjects: unequal skepticism depending on the story, and management resistance to correction.

IV. BBC Arabic and Coverage of Israel, Hamas, and the Gaza War

The memorandum's longest section concerned BBC Arabic. An internal review comparing BBC Arabic with BBC English over five months in 2024 found substantial differences in terminology, story selection, and framing: less attention to Israeli hostages and victims of Hamas, more emphasis on criticism of Israel, omission of Hamas conduct, and unequal treatment of Israeli and Palestinian victims, including in coverage of the Yazidi hostage Fawzia Sido, the October 2024 Jaffa attack, hostage deaths in Gaza, and the Majdal Shams attack.²²⁰ On October 7, 2023, the BBC's English-language news site published 19 articles about the hostages taken by Hamas; BBC Arabic published none.^{221c}

The review concluded: "It is hard to conclude anything other than that BBC Arabic's story treatment was designed to minimise Israeli suffering and paint Israel as the aggressor."²²⁰ Prescott reported that management took no meaningful corrective action after the review was presented.^{220 221}

V. The Withheld Record

Prescott told Parliament that much of his memorandum quoted the Grossman reports and that he urged the Board to read them in full.^{221b} The Grossman reports, the BBC Arabic comparison review, and the record of management's responses remain unpublished. The BBC Chair has said the memorandum omits the "full picture" of the discussions, decisions, and actions taken.^{221a} The full picture is in the BBC's possession.

VI. Full Disclosure Is Required, and the Commission Can Compel It

No Commission rule requires every seller to publish adverse internal or regulatory findings as such. The duty arises from Section 5 itself: a seller that makes affirmative claims of impartiality and accuracy must disclose facts that would otherwise leave those claims misleading, and the Commission may order corrective disclosure where a seller's marketing has left a false impression.^{221e} Respondents market BBC news in the United States as impartial and rigorously verified; their own reviews found otherwise on a U.S. election, a U.S. President, and BBC Arabic.

The Commission has the tools to obtain the full record. It may require written reports and answers to specific questions, issue subpoenas, and serve civil investigative demands in any investigation of deceptive practices; courts enforce those demands when the inquiry is within the Commission's authority, the demand is reasonably definite, and the information is reasonably relevant, and noncompliance is punishable by court order and contempt.^{221d} The Commission's Section 5 authority reaches foreign conduct that causes reasonably foreseeable injury in the United States or involves material conduct here, and the U.S. SAFE WEB Act authorizes cooperation with foreign authorities, including in the United Kingdom.^{221f} Respondents' U.S. operations, through which they sell BBC.com subscriptions and advertising, are within the Commission's reach.

The Commission should require Respondents to produce the Grossman reports, the BBC Arabic comparison review, and the related Board and committee records, and, on finding deception, should require Respondents to disclose the substance of those findings in their U.S. marketing.

VII. Conclusion

The Prescott memorandum is the BBC's own oversight system reporting that BBC journalism misled audiences about a U.S. election and a U.S. President and that BBC Arabic minimized Israeli suffering. U.S. consumers and advertisers are entitled to that information before relying on the BBC's claims of impartiality, and the Commission has the authority to obtain it and require its disclosure.

Sources (Exhibit F)

215. Gordon Rayner, *"Revealed: The Devastating Memo That Plunged the BBC into Crisis."*

Publisher: The Daily Telegraph.

Date: November 6, 2025.

216. Michael Prescott Memorandum – Introduction and observations concerning BBC Executive responses to Editorial Guidelines and Standards Committee findings.

Source: Memorandum excerpts published by *The Daily Telegraph*.

Date: 2025.

217. Michael Prescott Memorandum – U.S. Election Coverage, *Panorama* editing of President Trump's January 6 speech, Liz Cheney coverage, and related election-reporting findings.

Source: Memorandum excerpts published by *The Daily Telegraph*.

Date: 2025.

218. Michael Prescott Memorandum – Race reporting, BBC Verify statistical reporting, insurance-pricing coverage, employment statistics reporting, and push-notification review findings.

Source: Memorandum excerpts published by *The Daily Telegraph*.

Date: 2025.

219. Michael Prescott Memorandum – Biological sex, gender identity, newsroom culture, viewpoint diversity, and editorial-guidance concerns.

Source: Memorandum excerpts published by *The Daily Telegraph*.

Date: 2025.

220. Michael Prescott Memorandum – BBC Arabic coverage of Israel, Hamas, hostages, Fawzia Sido, the Jaffa attack, Majdal Shams, and related findings concerning minimization of Israeli suffering.

Source: Memorandum excerpts published by *The Daily Telegraph*.

Date: 2025.

221. David Grossman reviews and analyses referenced throughout the Prescott Memorandum and discussed before the Editorial Guidelines and Standards Committee.

Source: Described in Prescott Memorandum excerpts published by *The Daily Telegraph*.

Date: 2024–2025.

221a. Culture, Media and Sport Committee, publication of the Prescott memorandum with BBC Chair Samir Shah's written response, Nov. 10, 2025.

221b. Culture, Media and Sport Committee, Oral Evidence: The Work of the BBC, HC 331, Nov. 24, 2025 (testimony of Michael Prescott), <https://committees.parliament.uk/oralevidence/16777/pdf/>.

221c. Reuters, “Factbox: What Are the Key Claims Made in the Leaked Internal BBC Memo?,” Nov. 2025, <https://www.yahoo.com/news/articles/factbox-key-claims-made-leaked-131040944.html>.

221d. 15 U.S.C. §§ 46(b) (special reports), 49 (subpoenas), 50 (penalties for noncompliance), 57b-1 (civil investigative demands); *United States v. Morton Salt Co.*, 338 U.S. 632, 652 (1950); *FTC v. Texaco, Inc.*, 555 F.2d 862, 872–74 (D.C. Cir. 1977) (en banc); *FTC v. Invention Submission Corp.*, 965 F.2d 1086, 1089 (D.C. Cir. 1992).

221e. FTC Policy Statement on Deception, appended to *Cliffdale Associates, Inc.*, 103 F.T.C. 110, 175 & n.4 (1984) (omissions); *J.B. Williams Co. v. FTC*, 381 F.2d 884, 889–91 (6th Cir. 1967); *Warner-Lambert Co. v. FTC*, 562 F.2d 749, 758–64 (D.C. Cir. 1977) (corrective advertising); *Novartis Corp. v. FTC*, 223 F.3d 783, 787–89 (D.C. Cir. 2000) (corrective advertising).

221f. 15 U.S.C. § 45(a)(4)(A); U.S. SAFE WEB Act of 2006, 15 U.S.C. §§ 46(j), 57b-2a.

EXHIBIT G

THE ASSERSON REPORT: 1,553 BREACHES OF BBC EDITORIAL GUIDELINES IN COVERAGE SOLD TO U.S. CONSUMERS

I. The U.S. Connection

The Asserson Report found 1,553 breaches of the BBC's own Editorial Guidelines in four months of BBC coverage of the Israel– Hamas war, from October 7, 2023 to February 7, 2024.^{222 224a} The coverage it examined is the coverage Respondents sell in the United States: 1,529 articles on the BBC website, 579 BBC Arabic web articles, 450 BBC Arabic videos, and 33 episodes of the BBC's international podcast *The Conflict*, together with the BBC's principal television and radio news programmes, nearly nine million words in all (Report at 9–11). Each of those web, Arabic, and podcast products reaches U.S. consumers through BBC.com, the BBC News app, and podcast platforms, under Respondents' claims of impartiality. The full report is available at <https://asserson.co.uk/wp-content/uploads/2024/09/asserson-report.pdf>.²²² Page citations below are to that report.

A U.S. organization that marketed a product while its own governing standards were breached more than 1,500 times in four months, on the subject its customers most needed it to get right, would face the question this Exhibit presents: whether its claims about the product are true.

II. The Most Material Finding: The BBC Has No System to Measure the Impartiality It Sells

The report establishes, from discussions with past and present senior BBC personnel, that the BBC sets no performance indicators for impartiality and has no internal system to record or assess its output's compliance with its impartiality obligations; it relies on audience surveys of perception (Report at 16). The report's author wrote to the Director-General asking the BBC to confirm or explain its method and received no answer (Report at 16 & n.60).

Under Section 5, a seller that makes an objective claim must possess a reasonable basis for it when the claim is made.^{224b} Impartiality and accuracy are the attributes Respondents sell. A seller that has no system for measuring whether its product possesses the attribute it advertises has no reasonable basis for advertising it. This finding alone warrants investigation, and the Commission can test it directly by requiring Respondents to produce whatever substantiation they hold.

III. Undisclosed Hamas and Terror-Supporting Affiliations of BBC Arabic Interviewees

BBC Arabic interviewed 487 Arabic-speaking contributors in the period and identified 253 of them. Of those 253, the report's three research teams found 68 (27 percent) who were members of Hamas or had posted support for terrorism against Jews, including celebration of October 7, and found no instance in which the BBC disclosed those affiliations to its audience; extrapolated across all 487, the figure is about 131 (Report at 58–69). Examples include senior Hamas leader Mousa Abu Marzouk, the deputy head of

the Houthi media organization, and a retired Egyptian officer, Samir Ragheb, interviewed nine times across BBC English and BBC Arabic as a “military expert,” who called October 7 “a new military miracle” (Report at 61, 63).

The BBC’s own Guidelines require it to tell audiences about contributors’ affiliations, funding, and viewpoints when relevant (Report at 6, 58). Federal law imposes the same rule on U.S. sellers: a material connection between a content source and an interested party must be disclosed.^{224c} A U.S. viewer of BBC Arabic was given a Hamas official’s or a terror supporter’s account of the war as independent comment.

IV. Other Egregious Findings

Sympathy and balance. Human reviewers graded BBC Arabic web content 93.5 percent sympathetic to Palestinians and 6.5 percent to Israelis (Report at 44–46). Measured against about 630,000 headlines from 1,500 news outlets, BBC Arabic ranked among the most extreme outlets examined, and BBC English was also imbalanced (Report at 32–37). The BBC’s *The Conflict* podcast was 90 percent imbalanced among non-neutral episodes (Report at 40–41), and *Newsnight* broadcast no programme in the period graded positive to Israel (Report at 41).

Omissions. Across nearly nine million words, the BBC referred to the Hamas Charter eleven times, only three of them in its own editorial voice (Report at 71–74); one BBC journalist, once, described Hamas’s rule as authoritarian (Report at 77); and the report found no instance of the BBC telling audiences that Hamas restricts journalists in Gaza (Report at 80), although the BBC relied heavily on Gaza-based sources.

Terminology. Of 12,459 BBC references to Hamas, 963 (7.7 percent) associated it with terror and about 3 percent described it as a proscribed or designated terrorist organization, while the BBC described the West Bank as occupied in 25.4 percent of references (Report at 82–86).^{224a} The BBC associated Israel with war crimes about four times as often as Hamas and with genocide about fourteen times as often (Report, Section 8, Omission 5, at 87–90).^{224a}

Personal opinion. The report devotes sixteen pages to expressions of personal opinion by Jeremy Bowen, the BBC’s International Editor, contrary to the BBC’s rule that its journalists keep their views out of their reporting (Report at 173–188).

V. Cross-References

The BBC questioned the report’s reliance on artificial intelligence (see Exhibit A, Section IV), but it has published no rebuttal of the report’s specific findings. Those findings have been independently corroborated: the BBC’s own internal review, summarized in the Prescott memorandum, found BBC Arabic’s treatment “designed to minimise Israeli suffering and paint Israel as the aggressor” (Exhibit F, Section IV), and the correction record compiled in Exhibit I documents the same divergence. The report was submitted to the Director-General, the Chair, and every Board member in September 2024.^{224a} It put the BBC on notice, and Prescott reported that management took no meaningful corrective action (Exhibit F).

That failure is why Commission intervention is needed. About 1.4 million people in the United States speak Arabic at home, part of the 3.5 million Americans of Middle Eastern and North African origin, and BBC Arabic delivers them the coverage the report measured under the BBC's impartiality brand.^{224e} See also Complaint, Section V and note 28; Exhibits A, C, F, and I.

VI. A Cumulative Pattern of Deception

The law weighs violations cumulatively. Courts consider a respondent's history and pattern of violations in determining both the likelihood that the practice will continue and the scope of relief, and they uphold broad orders where deception recurs across products, media, and time.^{224d} (See also Complaint, Section VII.D and note 60.)

The Asserson findings meet that standard. The breaches are numerous (1,553 in four months), consistent in direction, spread across every BBC platform examined, most pronounced in the BBC Arabic service Respondents serve to U.S. consumers, and continuous with the record in Exhibits A through F and I, from the BBC's wartime Holocaust reporting to its 2026 Holocaust Memorial Day broadcasts. Throughout, Respondents continued to market the BBC in the United States as impartial, without a system to measure that claim and without disclosing the findings against it. That is a pattern of deception, and it warrants investigation and relief extending to all of Respondents' impartiality claims in the United States.

VII. Conclusion

The Asserson Report is the most comprehensive measurement of BBC coverage of the Israel-Hamas war, and it measures the coverage U.S. consumers receive. Its findings, together with the BBC's lack of any system to substantiate its impartiality, are material to U.S. consumers and advertisers and support the Commission's investigation and the relief requested. (See Complaint, Sections IX and XII.)

Sources (Exhibit G)

222. Trevor Asserson, *The Israel-Hamas War and the BBC* (Full Report).

Publisher: Asserson Law Offices.

Date: September 2024.

URL: <https://asserson.co.uk/wp-content/uploads/2024/09/asserson-report.pdf>

223. Trevor Asserson, *The Israel-Hamas War and the BBC – Executive Summary*.

Publisher: Asserson Law Offices.

Date: September 2024.

URL: <https://asserson.co.uk/wp-content/uploads/2024/09/asserson-summary.pdf>

224. Asserson Law Offices, *Asserson Report Portal*.

Publisher: Asserson Law Offices.

URL: <https://asserson.co.uk/assersonreport/>

224a. The Jerusalem Post, "BBC Breaches Its Own Editorial Guidelines 1,500 Times over Israel-Hamas War – Report," Sept. 2024, <https://www.jpost.com/israel-hamas-war/article-819124>; JNS, "BBC 'Breached Guidelines 1,553 Times' Against Israel,"

Sept. 2024, <https://www.jns.org/bbc-breached-guidelines-1553-times-against-israel/> (Hamas described as proscribed, designated, or recognized terrorist organization 409 times of 12,459 mentions); Haaretz, “‘A Distinct Pattern of Bias Against Israel’: Report on BBC Coverage of War in Gaza,” Sept. 8, 2024 (war crimes 127 versus 30; genocide 283 versus 19; international law 167 versus 27).

224b. FTC Policy Statement Regarding Advertising Substantiation, appended to Thompson Medical Co., 104 F.T.C. 648, 839–42 (1984); Pfizer, Inc., 81 F.T.C. 23, 62–64 (1972); Thompson Medical Co. v. FTC, 791 F.2d 189, 193–94 (D.C. Cir. 1986).

224c. 16 C.F.R. § 255.5; see Exhibit D, Section IX and note 209f.

224d. Telebrands Corp. v. FTC, 457 F.3d 354, 358–62 (4th Cir. 2006); Sears, Roebuck & Co. v. FTC, 676 F.2d 385, 391–92 (9th Cir. 1982); Kraft, Inc. v. FTC, 970 F.2d 311, 326–27 (7th Cir. 1992); United States v. W.T. Grant Co., 345 U.S. 629, 633 (1953); FTC v. Gill, 265 F.3d 944 (9th Cir. 2001).

224e. Pew Research Center, “5 Facts About Arabic Speakers in the U.S.,” May 18, 2023 (about 1.4 million people ages 5 and older spoke Arabic at home in 2021, up from 215,000 in 1980), <https://www.pewresearch.org/short-reads/2023/05/18/5-facts-about-arabic-speakers-in-the-us/>; see Complaint, note 63a (2020 Census: 3.5 million MENA respondents).

EXHIBIT H

DECADES OF CRITICISM OF BBC CLAIMS OF OBJECTIVITY AND INDEPENDENCE, AND WHY IT MATTERS IN THE U.S. MARKET

I. Overview

A company that has been publicly and repeatedly criticized abroad for selling a defective product, or for misrepresenting its services, carries that record with it when it enters the U.S. market. U.S. buyers are entitled to weigh it, and the company cannot sell here on a reputation its record contradicts while keeping the record from them. The BBC is in that position. For decades, a former BBC journalist, a leading media sociologist, and the BBC's own official historian have documented a gap between the BBC's claims of objectivity and independence and the way it operates. Respondents market the BBC in the United States on the strength of the very reputation these works question.

These critiques span different eras, authors, and subjects, which makes them more probative: the criticism has come from inside the BBC, from academic research, and from the BBC's own commissioned history.

II. The Critiques

Tom Mills, *The BBC: Myth of a Public Service* (Verso, 2016). Drawing on archival research covering the BBC's history from the 1926 General Strike onward, Mills documents how government funding, establishment influence, and security-service vetting of BBC staff shaped an institution publicly presented as independent.²²⁵

Robin Aitken, *Can We Trust the BBC?* (2007). A former BBC journalist describes from inside the corporation an editorial culture that undermined its claims of impartiality, and management that presented the BBC as uniquely impartial while leaving those problems unaddressed.²²⁶

Asa Briggs, *The History of Broadcasting in the United Kingdom*. The BBC's official history documents periods, particularly in wartime, when BBC broadcasting operated within government information objectives.²²⁷ Because it is the BBC's own commissioned history, it is an admission rather than outside criticism.

III. Why the Record Matters to U.S. Consumers and Advertisers

Federal law treats a seller's knowledge of credible adverse information about its product as material when the seller continues to make claims the information contradicts. Failure to disclose material facts is deceptive, and the Commission has required disclosure of known product hazards documented by outside reports.^{227a} Consumers are entitled to choose the source of what they buy, for whatever reason, on accurate information.^{227b} The BBC knows of this body of criticism, part of which is its own history, and it markets its trustworthiness in the United States without acknowledging it.

These critiques also corroborate the Complaint's central findings. Taken with the BBC's wartime minimization of the Holocaust (Exhibit B), its omission of the history of Jews in the Middle East (Exhibit C), its 2026 Holocaust Memorial Day broadcasts (Exhibit B),

and the Asserson and Prescott findings on its coverage of Israel (Exhibits F and G), they show an institution whose claims of objectivity have repeatedly failed, and failed most consistently where Jews and Israel are concerned. That combined record is objective evidence of institutional antisemitism. A U.S. consumer choosing a news source, and a U.S. advertiser choosing where to place its brand, would consider that important.

IV. Conclusion

The BBC entered the U.S. market with a documented history of criticism of its objectivity and independence, including from its own former journalists and official historian. Respondents sell the BBC in the United States on the reputation that history contradicts. Those facts are material, their omission is deceptive, and they support a finding that Respondents' impartiality claims are false.

Sources (Exhibit H)

225. Tom Mills, *The BBC: Myth of a Public Service*.

Publisher: Verso.

Date: 2016.

226. Robin Aitken, *Can We Trust the BBC?*

Publisher: Continuum International Publishing Group.

Date: 2007.

227. Asa Briggs, *The History of Broadcasting in the United Kingdom* (relevant volumes discussing BBC independence, wartime broadcasting, and relations with government).

Publisher: Oxford University Press.

Dates: Various volumes, 1961–1995.

227a. J.B. Williams Co. v. FTC, 381 F.2d 884, 889–91 (6th Cir. 1967); Simeon Management Corp. v. FTC, 579 F.2d 1137, 1145 (9th Cir. 1978); International Harvester Co., 104 F.T.C. 949, 1059–64 (1984) (failure to disclose known safety hazard documented in accident reports); FTC Policy Statement on Deception, appended to Cliffdale Associates, Inc., 103 F.T.C. 110, 175 & n.4 (1984).

227b. FTC v. Royal Milling Co., 288 U.S. 212, 216 (1933); FTC v. Algoma Lumber Co., 291 U.S. 67, 78 (1934); see Exhibit C, note 172j.

EXHIBIT I

BBC ARABIC AND PERSIAN: RECURRING ADOPTION OF HAMAS, HEZBOLLAH, AND IRANIAN LANGUAGE AND CLAIMS

I. Overview

This Exhibit sets out, year by year, the documented record of BBC Arabic adopting the vocabulary of Hamas, Hezbollah, and Iran, and of BBC Monitoring carrying an Iranian wartime claim, where BBC English described the same organizations and events in neutral terms. Translations and characterizations of Arabic text are as published by the cited monitoring organizations.

The record matters in the United States. BBC Arabic reaches U.S. consumers through BBC.com, the BBC News app, and its YouTube channel, and its U.S. audience includes Arab Americans, part of the 3.5 million Americans of Middle Eastern and North African origin (see Complaint, Section VII.D and note 63a). Respondents represent to U.S. consumers, advertisers, and licensees that BBC Arabic and BBC Persian apply the same standards of accuracy and impartiality as BBC English. The record below tests that representation.

II. The Record

2015–2020 — BBC Arabic and BBC English. Over the same period BBC Arabic reported 25 fatal terrorist attacks on Israeli civilians, against 34 reported by BBC English.²²⁸

June 2019 — BBC Arabic. Reproduced the slogan “Death to Israel, death to America, and glory to the Resistance”; removed after complaint.²²⁸

August 2020 — BBC Arabic. Translated a BBC English report that the Trump peace plan “potentially awards” Israel U.S. recognition as having “awarded” it; corrected after complaint.²³¹

May 2021 — BBC Arabic. Described Jewish Israelis in Lod, Haifa, Jaffa, Ramla, and Bat Yam, inside Israel, as “settlers”; eight corrections in about three weeks.²²⁹

2022–February 2023 — BBC Arabic. Described Israeli communities near Gaza, inside Israel, as “settlements”; by February 2023 the BBC had corrected the same error six times in under six months.²³⁰

October 2023–May 2024 — BBC Arabic. Described Hamas or Hezbollah as “the Resistance” three times and attacks that killed civilians as “resistance operations” twice; every instance required correction.²²⁸

January 2024 — BBC Arabic. Framed the killing of a 79-year-old Israeli woman as a question of “terrorism or resistance?”^{228 236}

May 2024 — BBC Arabic and BBC English. Lebanon reporting led with Lebanese civilian deaths, gave less prominence to Israeli civilians killed by Hezbollah fire, omitted Israeli security personnel killed, and left out UN Security Council Resolution 1701.²³³

December 2025 — BBC Arabic. CAMERA UK reported that BBC Arabic had by then corrected “settlements” and “settlers” errors more than 40 times.²³⁴

March 1, 2026 — BBC Monitoring. Carried an IRGC claim that Iranian strikes had killed or wounded 560 American soldiers, contrary to confirmed U.S. casualty reporting.²³⁵

March 11–12, 2026 — BBC Arabic. Called Hezbollah “the Islamic Resistance,” its own self-designation, while BBC English called it an “Iranian-backed armed group” and reported about 200 rockets fired into northern Israel; removed after complaint.²³²

September 2026 — BBC Arabic. The BBC opened a review after an investigation identified 53 people whom a BBC Arabic report described as journalists and who allegedly had links to Hamas and other terrorist groups.^{239d}

III. Scale of Corrections and the Complaints Process

BBC Arabic made 80 corrections in the first five months of the war, about one every 48 hours;²³⁶ ²³⁸ 141 in the first year, with the BBC upholding more than 80 percent of CAMERA’s complaints;²³⁷ and 215 corrections and clarifications by November 2025.^{239a} Over the same period, the BBC’s Executive Complaints Unit rejected every appeal CAMERA brought concerning BBC Arabic.^{239b} The BBC Director-General and the Chief Executive of BBC News resigned in November 2025 after the Prescott memorandum, which documented BBC Arabic’s divergence from BBC English, became public.²³⁹ (See Exhibit F.)

IV. Relevance to the Complaint

The record shows BBC Arabic repeatedly converging with the political vocabulary of Hamas, Hezbollah, and the Iranian government, diverging from BBC English, and continuing to do so for years after the BBC was notified and made corrections. The March 2026 recurrence of “the Islamic Resistance,” after earlier corrections of the same term, shows that notice did not change the practice. (See Complaint, Sections II.B, V, and VIII.)

Respondents tell U.S. consumers, advertisers, and licensees that BBC Arabic and BBC Persian meet the same standards as BBC English. The record contradicts that representation, Respondents have known of it for years, and they continue to make the representation without disclosing it. That is a continuing deceptive practice under Section 5. (See Exhibit G, Section VI.)

Sources (Exhibit I)

228. CAMERA, BBC Arabic report (comprehensive compilation of corrections and terminology findings).

229. CAMERA UK, “CAMERA Arabic Prompts Eight BBC Arabic Corrections in Three Weeks,” May 22, 2021.

230. CAMERA UK, “For the Sixth Time in Six Months, BBC Arabic Corrects ‘Settlements’ Error,” Feb. 27, 2023.
231. CAMERA UK, “BBC Arabic’s Mistranslations of an English-Language BBC Article,” Aug. 9, 2020.
232. CAMERA, “How Did the BBC Portray Hezbollah’s Escalation?,” March 17, 2026.
233. CAMERA UK, “BBC Report from South Lebanon Ignores UNSC Resolution 1701,” May 2, 2024.
234. CAMERA UK, “Turning a Blind Eye to Bias at BBC Arabic,” Dec. 14, 2025.
235. BBC Monitoring product, March 1, 2026 (IRGC casualty claim); see Complaint, Section VIII.C and note 97.
236. Israel Hayom, “UK Opposition Leader ‘Truly Shocked’ by Media Watchdog Report on BBC,” Mar. 10, 2025 (independently reporting CAMERA’s 80-correction figure).
237. UnHerd, “BBC Arabic Is Ducking Scrutiny Over Anti-Israel Bias,” Mar. 16, 2025 (independently reporting 141 corrections over the first full year of the war and that the BBC upheld more than 80% of CAMERA’s complaints).
238. Middle East Monitor, “BBC Arabic Corrects Coverage 80 Times Over Gaza War,” May 6, 2024 (reporting The Telegraph).
239. Politico and related reporting on the November 2025 resignations of BBC Director-General Tim Davie and BBC Chief Executive of News Deborah Turness following disclosure of the Prescott Memorandum; see Exhibit F; see also Committee Report, *supra* note 5a, ¶ 12.
240. 239a. The Times of Israel, “Report: BBC Had to Correct 2 ‘Biased, Inaccurate or Misleading’ Gaza Stories a Week,” Nov. 2025 (reporting The Telegraph and CAMERA: 215 BBC Arabic corrections and clarifications since Oct. 7, 2023), https://www.timesofisrael.com/liveblog_entry/report-bbc-had-to-correct-2-biased-inaccurate-or-misleading-gaza-stories-a-week/.
241. 239b. The Jerusalem Post, “BBC Slammed for Rejecting All CAMERA Appeals Against Arabic-Language Gaza Coverage,” Nov. 2025 (reporting The Jewish Chronicle), <https://www.jpost.com/middle-east/article-873836>.
242. 239d. Jewish News, “BBC Reviews Gaza ‘Journalists’ After Terror Links Claims,” Sept. 2026, <https://jewishnews.co.uk/bbc-reviews-gaza-journalists-after-terror-links-claims>; see Exhibit D, note 209e.