

AGENT OF RUSSIAN INTERESTS ABROAD: ASSESSING THE MOSCOW PATRIARCHATE’S ACTIVITY IN THE BALKANS AND BEYOND

*Robert C. Blitt**

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* Toms Foundation Distinguished Professor of Law, University of Tennessee College of Law. This Article elaborates on some initial thoughts presented during a panel addressing the role of non-state actors during armed conflict, organized by Gonzaga University School of Law as part of a larger international symposium entitled “Scope of the Ukraine War: An Ontological Question of International Law.” I am indebted to my co-panelists and other participants for their helpful prompts and questions surrounding this topic and extend thanks to Prof. Upendra Acharya and to the conference organizers, Hannah Swenson, Emily Bare, and Anthony C. Greene, for their very gracious invitation to participate in this important event. Thanks to Jerrod Maddio and his team for their professional attention to detail bringing this manuscript to print.

I. INTRODUCTION

This Article addresses the role played by the Russian Orthodox Church—Moscow Patriarchate (ROC) in supporting the Kremlin’s policy objectives in the Balkans, a region with significant historical ties to Russia and a common religious heritage steeped in Eastern Orthodoxy. In the face of Russia’s invasion of Ukraine, concern for the region’s stability has grown. This is particularly so due to Kremlin efforts to deflect attention away from Ukraine by fueling ethnic, religious, and political tensions left over from the U.S.-brokered Dayton Accords that ended the years of war following Yugoslavia’s collapse. The analysis presented herein demonstrates that the ROC’s operation as a nonstate actor faithfully advances Kremlin interests in the region through direct church rhetoric and activities, as well as indirectly, via its extended network of proxies and multilateral platforms. Both in the Balkans and beyond, ROC messaging premised on the protection of Orthodoxy and “traditional values” fortifies Kremlin efforts to undermine Western norms and institutions, destabilize vulnerable societies, and posit Russia as a viable economic and political partner and civilizational alternative to the West.

To substantiate these findings, the Article begins by briefly sketching Russia’s historical activity in the Balkan region as well as Russian church-state relations. With this background in place, Part III then turns to explore the substance and variety of ROC action in the region directed at supporting Kremlin policy. After taking stock of the ROC’s own unique methods of engagement that confirm an enthusiastic embrace and dissemination of Kremlin objectives, Part IV explores the durability of Russia’s current church-state alignment against the backdrop of various factors, including Russia’s newly amended constitution, its new Foreign Policy Concept, the ongoing war against Ukraine, and simmering inter-Orthodox tensions, exacerbated in part by autocephaly for the new Orthodox Church of Ukraine (OCU) in 2019.¹ Part V focuses on broader lessons that may be extracted from contemporary Kremlin-ROC dynamics in the Balkan region, including how ROC engagement operates more globally to echo Kremlin interests. It also provides an assessment of how the Kremlin attributes success to the ROC’s myriad soft power activities abroad. The Article concludes by offering several recommendations for responding to the challenges posed by the ROC’s activism on behalf of the Kremlin in the Balkans and beyond.

¹ The OCU united two previously existing, though formally uncanonical Ukrainian Orthodox churches: The Ukrainian Orthodox Church—Kyiv Patriarchate (UOC-KP) and the Ukrainian Autocephalous Orthodox Church (UAOC). Both the UOC-KP and UAOC were dissolved to create the OCU. These churches are distinct from the Ukrainian Orthodox Church—Moscow Patriarchate (UOC-MP), which Russia considers Ukraine’s only canonical Orthodox Church.

II. RUSSIA IN THE BALKANS: A BRIEF OVERVIEW OF AN ONGOING HISTORY

Russia has a centuries-long history of seeking to exert active influence across the Balkans, despite this area falling well outside of its claimed sphere of influence over geographically-adjacent “near abroad” states.² Dating back to the Tsarist era, the Russian empire sought to curry regional favor as the supposed protector of Eastern Orthodoxy and pan-Slavic interests.³ During and following this unfolding period, the ROC served as a tool for facilitating and supporting Russia’s evolving missionary foreign policy. Thus, the ROC—its officials and proxies alike—may be seen consistently espousing and advancing a view in lockstep with Russian authorities over time: from the early days of Tsarist *symphonia*,⁴ through the period of communist cooption,⁵ and well into the current Putin era. Today, the ROC enjoys pride of place as the ideological wellspring for the pointedly anti-Western “traditional values” embraced by the Putin government and formalized, since

2. The term “near abroad” encompasses Russia’s relations with former Soviet republics. See Elias Götz, *Near Abroad: Russia’s Role in Post-Soviet Eurasia*, 74 EUROPE-ASIA STUDIES 1529, 1530 (2022).

3. Pan-Slavism, constituted in the first half of the 19th century, “was the first modern politically conceptualised pan-nationalism. But pan-nationalisms could also serve as a veil for the pragmatic interests of imperial states, which in the case of Pan-Slavism was Tsarist Russia.” Mikhail Suslov, *Preface to PAN-SLAVISM AND SLAVOPHILIA IN CONTEMPORARY CENTRAL AND EASTERN EUROPE*, at vi (Mikhail Suslov, Marek Čejka & Vladimir Đorđević eds., 2023).

4. The traditional Orthodox doctrine of *symphonia* entails “the striving for a harmonious relationship between religious and political spheres.” Vicki L. Hesli et al, *The Patriarch and the President: Religion and Political Choice in Russia*, 7 DEMOKRATIZACIJA 42, 46 (1999). More practically, the term describes the synergy of Church and Empire, understood to represent the “two greatest gifts which God, in his love for man, has granted from on high: the priesthood and the imperial dignity. The first serves divine things, the second directs and administers human affairs; both, however, proceed from the same origin and adorn the life of mankind.” JOHN MEYENDORFF, *BYZANTINE THEOLOGY: HISTORICAL TRENDS AND DOCTRINAL THEMES* 213 (1974). While the ROC held out *symphonia* as the idealized church-state relation, the state did not necessarily deign to comply. For example, Ivan the Terrible had Metropolitan Fillip strangled for opposition to his repression of political enemies and for “denouncing his barbarous reign.” Zoe Knox, *The Symphonic Ideal: The Moscow Patriarchate’s Post-Soviet Leadership*, 55 EUROPE-ASIA STUDIES 575, 576 (2003). It is similarly questionable whether the “pre-1917 de facto subordination of the church hierarchy to a secular chief procurator” comported with the symphonic ideal. Vyacheslav Karpov, *The Social Dynamics of Russia’s Desecularisation: A Comparative and Theoretical Perspective*, 41 RELIGION, STATE & SOCIETY 254, 266 (2013).

5. The ROC proved useful for Stalin as a foreign policy tool and prompted the elaboration of external relations mechanisms for the ROC to be used for state purposes. Nickolas Lupinin, *The Russian Orthodox Church, in EASTERN CHRISTIANITY AND THE COLD WAR 1945–91*, at 20-21 (Lucian N. Leustean ed., 2010). As part of the KGB’s cooption of the ROC, the Church “would organize a variety of assemblies and conferences at which the visiting church leaders of other countries were to be manipulated for Soviet purposes.” Paul Mojzes, *Yugoslavia’s Churches Squeezed Between East and West During the Cold War*, 31 OCCASIONAL PAPERS ON RELIGION E. EUR., no.4, 2011, at 4.

2022, as a core component of Russia's newly constitutionalized civilizational identity.⁶

As in Russia, Eastern Orthodoxy is the primary religion across most of the Balkan states. Despite the Ecumenical Patriarchate's historical struggle to preserve its central role among a multiethnic flock and to tamp down the heresy of "ethnophyletism,"⁷ the role played by Orthodoxy as a key tool for national political legitimation among these states cannot be understated.⁸ Thus, as much as Orthodoxy was held up as a potentially unifying force among coreligionists, the centrality of autocephaly in the process of shaping national identity across southeastern Europe challenged the very premise of a faith free of ethnic considerations.⁹ Despite this apparent fracturing of Orthodox unity, however, each of the newly independent churches continued to share predominant characteristics, namely "conservatism, intolerance...and nationalism."¹⁰ Likewise, the previous Islamic conquest of the Orthodox world brought about by the Ottoman Empire cemented a shared history among Serbs, Greeks, Bulgarians, and others. It also facilitated Russia's narrative as the great liberator, "breaking Islamic rule and restoring freedom to Christian communities in the Balkans."¹¹

Although Russia's initial attempts to secure recognition for itself as the official guardian of the Ottoman Empire's 12 million Orthodox faithful¹² may

6. Robert C. Blitt, *Justifying Aggression: Russia's 2020 Constitutional Amendments and the Invasion of Ukraine*, 57 VAND. J. TRANSNAT'L L. 1, 51 (2024).

7. Ioannis N. Grigoriadis, *The Ecumenical Patriarchate as a Global Actor: Between the End of the Cold War and the Ukrainian Ecclesiastical Crisis*, 13 J. MIDDLE E. & AFR. 345, 354 (2022). (noting the "rise of Greek, Bulgarian, Romanian, Serbian, and Albanian nationalist movements challenged the unifying role of Orthodox Christianity and brought the Ecumenical Patriarchate under severe pressure.")

8. This tendency has persisted in Ukraine and in the Balkan region. See Mira Milosevich, *Russia's Weaponization of Tradition: The Case of the Orthodox Church in Montenegro*, CSIS (Sep. 25, 2020), <https://www.csis.org/blogs/post-soviet-post/russias-weaponization-tradition-case-orthodox-church-montenegro>; see also Mladen Aleksic, *Violence in Montenegro Shows Persisting Division in Balkans and Orthodoxy*, RELIGION UNPLUGGED (Sep. 20, 2021), <https://religionunplugged.com/news/2021/9/17/violence-at-montenegro-monastery-shows-persisting-division-in-balkans-and-orthodoxy>.

9. "Religious identity was also responsible for impeding national awakenings. Populations in the Balkans, whose 'nationality' remained uncertain or ambiguous, retained a strong identification with their religious creed." Thanos Veremis, *Nationalism & Identity in the Balkans*, CLASSICS J., <https://classics-at.chs.harvard.edu/classics10-thanos-veremis-nationalism-identity-in-the-balkans/#n.1> (last visited April 11, 2024).

10. Ermin Sinanović, *The Serbian Orthodox Church and the 2020 Montenegro Elections*, BERKLEY F. (Oct. 15, 2020), <https://berkeleycenter.georgetown.edu/posts/the-serbian-orthodox-church-and-the-2020-montenegro-elections>.

11. Walter Russell Mead, *What Russia Doesn't Forget*, AM. INTEREST (Jun. 3, 2012), <https://www.the-american-interest.com/2012/06/03/what-russia-doesnt-forget/>. At the same time, Balkan states could play on Russia's assistance to further their own ambitions, even at Russia's own expense. See Janko Šćepanović, *Russia, the Western Balkans, and the Question of Status*, 37 E. EUROPEAN POL. & SOC'YS 1059, 1059 (2023).

12. According to Vjekoslav Perica, "Russian imperialist 'messianism' aspired to unite all the Orthodox under the tsars. A Russo-Serbo-Montenegrin brotherhood in arms grew strong particularly from the first Serbian uprising against Ottoman rule in 1804, through the Balkan

have failed disastrously,¹³ within a quarter-century it had achieved the military defeat of Turkish forces and was more well-positioned to assert the title. Russia continues to frame the 1878 Congress of Berlin, intended to mark the end of the Russo-Turkish war, as a victory inasmuch as it successfully fended off Western “European resistance and gain[ed] recognition of independence” for the Orthodox enclaves of Serbia, Montenegro, and Romania.¹⁴ At the same time, Russia’s deep resentment over the Congress’ outcome lingers.¹⁵ From its perspective, the agreement perpetrated a Western betrayal aimed at reducing Russia’s Balkan influence, in part by precluding the establishment of Bulgaria as a large new Slavic state. Russia’s Ministry of Foreign Affairs (MFA) recently summarized this living resentment thusly:

European monarchies sought to prevent the growth of Russian influence in the Balkans. Motivated, as always, by political factors...and sheer envy of the spectacular victories of Russian arms, they did their best to revise the terms of the provisional 1878 Russo-Turkish Treaty of San Stefano.¹⁶

crisis of the 1860s–70s, down to the outbreak of World War One.” Vjekoslav Perica, *The Politics of Ambivalence: Europeanization and the Serbian Orthodox Church*, in RELIGION IN AN EXPANDING EUROPE 176, 179 (Timothy A. Byrnes & Peter J. Katzenstein eds., 2006).

13. Vladislav Inozemtsev, *Russia’s Cold War Habit*, PROJECT-SYNDICATE.ORG (May 17, 2017), <https://www.project-syndicate.org/commentary/cold-war-russia-annexation-by-vladislav-inozemtsev-2017-05>.

14. *Briefing by Foreign Ministry Spokeswoman Maria Zakharova*, MINISTRY FOREIGN AFFS. RUSS. FED. (Jun. 21, 2023), https://mid.ru/en/press_service/spokesman/briefings/1890329/.

15. The Treaty of San Stefano of 1878 united all the lands inhabited by Bulgarians in one principality. But the subsequent Congress of Berlin superseded parts of this treaty and instead divided the territory, granting only northern Bulgaria full autonomy and separating off the southern portion while returning Macedonia to Turkish control. See Preliminary Treaty of Peace Between Russia and Turkey (Treaty of San Stefano), Feb.9 / Mar. 3, 1878, 2 AM. J. INT’L L. 387 (1908), <https://ia802904.us.archive.org/13/items/jstor-2212669/2212669.pdf>; Treaty Between Great Britain, Germany, Austria, France, Italy, Russia, and Turkey for the Settlement of Affairs in the East (Treaty of Berlin), Jul. 13, 1878, 2 AM. J. INT’L L. 401 (1908), <https://ia903201.us.archive.org/19/items/jstor-2212670/2212670.pdf> (according to the Treaty of Berlin’s preamble, a Congress of Western powers along with Russia and Turkey “offered the best means of facilitating an understanding” with respect to “the questions raised in the East by the events of late years and by the war terminated by the preliminary Treaty of San Stefano.”).

16. *Briefing by Foreign Ministry Spokeswoman Maria Zakharova*, *supra* note 14. This expression of resentment is not limited to official government outlets; it also permeates ostensibly non-profit academic think tanks funded by the Kremlin as well. See Irina Borshch, *Why International Institutions Overlook the Persecution of the Ukrainian Orthodox Church?*, RUSS. INT’L AFFS. COUNCIL (Aug. 15, 2023), <https://russiancouncil.ru/en/analytics-and-comments/analytics/why-international-institutions-overlook-the-persecution-of-the-ukrainian-orthodox-church/> (arguing that the international community’s lack of attention to alleged violations of freedom of religion in Ukraine directed against the ROC-affiliated UOC-MP “causes a déjà vu effect. As if we have travelled back in time to the mid-19th century, when Russia tried to defend the rights of its co-religionists—Christians in Eastern Europe—in the territory of the Muslim Ottoman Empire, while other great powers, ignoring religious arguments, explained the Russian foreign policy by selfish expansion motives.”).

This continually-stoked grievance remains a centerpiece in the Kremlin's contemporary framing of its Balkan entitlements. For example, in the context of Russo-Serbian relations, cultural, religious, and historical connections readily trace back to pan-Slavic¹⁷ and pan-Orthodox currents, and to Russia's support for Serbian independence flowing from the Ottoman defeat.¹⁸ Today, this touchstone has been renewed and expanded to include Russia's entry into World War I on Serbia's side, as well as Russia's still-seething rejection of NATO's bombing of Serbia, and its continued opposition to independence for Kosovo.¹⁹ These latter events also nourish the persistent specter of Western interference and meddling.

Russia's strategy of appealing to shared history and religion resonates beyond Serbia, and is driven equally by linguistic affinities with the Southern Slavs, human contacts, and visceral emotions (including fear).²⁰ Across the Balkans, these connections are wielded to cast uncertainty over Balkan integration into the European Union (EU) and NATO, to undercut core institutions like the Office of the High Representative (OHR) for Bosnia and Herzegovina,²¹ and to present Russia as a viable and natural alternative to the West—capable of defending shared Orthodoxy, conservative values, cultural commonalities,²² and even state sovereignty.

As part of this larger pitch, the Kremlin has publicly cautioned the United States to avoid “turn[ing] the Balkans into another spot of anti-Russian confrontation; otherwise[,] it will have disastrous consequences for Europe as a whole.”²³ This thinly veiled threat plays up Russia's capacity to fuel inter-ethnic tensions among Serbs, Bosniaks, Croats and others, and to destabilize the vulnerable political and territorial status of Bosnia and Herzegovina (BiH) and Kosovo. Yet in the words of Russian Foreign

17. The Russian Empire and the ROC nurtured the rise of pan-Slavism in the Ottoman Balkans, which in turn challenged the influence of the Ecumenical Patriarchate.

18. See Dmitrii Sidorov, *Post-Imperial Third Romes: Resurrections of a Russian Orthodox Geopolitical Metaphor*, 11 *GEOPOLITICS* 317, 325 (2006) (pan-Slavism and pan-Orthodoxy were geopolitically important concepts in the liberation of Balkan Orthodox peoples from the Ottoman Empire.).

19. Much like the Congress of Berlin, Russia considers the 1999 Kosovo crisis a humiliating event that challenged its great power status. Grigoriadis, *supra* note 7, at 357. Some scholars identify a lengthy lull in the invocation of “blood, faith, and history” from the end of WWI and until Serbia's conflict with NATO: “It felt as if the Russia of the Romanovs had awakened, by a magic spell, from seven and half decades of sleep to re-embrace its loyal ally from 1914.” This narrative reappeared initially in the anti-Yeltsin opposition, and gradually made its way into Russia's centrist and reformist political circles. DIMITAR BECHEV, *RIVAL POWER: RUSSIA'S INFLUENCE IN SOUTHEAST EUROPE* 25-31 (2017).

20. Šćepanović, *supra* note 11, at 5.

21. The OHR is responsible for overseeing implementation of civilian aspects of the 1995 Dayton Accords. See Office of the High Representative, *General information*, <https://www.ohr.int/about-ohr/general-information/> (last visited Apr. 14, 2024).

22. Šćepanović, *supra* note 11, at 6.

23. *Foreign Minister Sergey Lavrov's Interview with the Newspaper Oslobodjenje on the 25th Anniversary of Diplomatic Relations Established between the Russian Federation and Bosnia and Herzegovina on December 26, 1996, 1996*, OSLOBODJENJE (Dec. 24, 2021, 8:00 AM), https://mid.ru/en/foreign_policy/news/1791944/.

Minister Sergei Lavrov, “Moscow’s ‘malicious influence’ [in the Balkans] is an outright fabrication.” Rather, Russia’s objectives relate only to maintaining “Peace, security and stability.... Forcing an artificial choice on the Balkan states to side either with the European Union or with Russia is counterproductive and unfair. This provokes the creation of new dividing lines in the region and stands in the way of cooperation.”²⁴

While Moscow’s economic footprint in the Balkans is insignificant relative to the EU, several Balkan states maintain a still notable reliance on Russia as a source of energy, though this reliance, too, appears to be waning.²⁵ Compounding this loitering reliance, pro-Russian misinformation further obscures the level of assistance and cooperation the West continues to extend to the region. For example, a new gas pipeline from Azerbaijan to Serbia, facilitated in large part by over \$80 million in EU funding, “was barely reported in the Serbian media.”²⁶ Instead, Serbia’s state broadcaster claimed “that the gas was coming from Russia” and press photos from the pipeline’s opening ceremony showcased “the EU representative...hidden behind [] Serbian President Aleksandar Vucic.”²⁷

Even with the general dearth of Russian economic investment, the Balkans present low-hanging fruit for expanding Moscow’s influence.²⁸ Given the traditional affinities noted above, Kremlin backers reason that the people of the Balkans “are culturally close and politically sympathetic to Russia...Consequently, this is where Russia’s stance can find the greatest

24. *Id.*

25. Hall Gardner, *General Introduction: The Widening Gyre of Alliances in the Western Balkans and Eastern Mediterranean*, in *GEOPOLITICAL TURMOIL IN THE BALKANS AND EASTERN MEDITERRANEAN* 13 (Hall Gardner ed., 2023), (noting “only 6.6% of foreign direct investment in the region comes from Russia and Russia’s share of regional foreign trade is only 3.9% for export and 5.3 for imports.”). See also Dimitar Bechev, *Russia’s Energy Clout in the Balkans Is on Borrowed Time*, *CARNEGIE ENDOWMENT FOR INT’L PEACE* (Jan. 12, 2023), <https://carnegieendowment.org/politika/91154>. Still, at the end of 2022, Serbia remained heavily reliant on Russian energy imports, with all the country’s gas and “up to half of its oil” originating in Russia. Marton Dunai, *Serbia ‘in a hurry’ to Ease Energy Dependence on Russia*, *FIN. TIMES* (Nov. 6, 2022), <https://www.ft.com/content/bbbe1edc-6c7c-4d6a-ab1f-06982942d694>.

26. The EU funded nearly ninety percent of the \$90M construction cost, mostly in the form of nonrepayable grants. Thomas Brey, *Russia’s Influence Overshadows Serbia’s Election*, *DEUTSCHE WELLE* (Dec. 16, 2023), <https://www.dw.com/en/russias-influence-overshadows-serbias-election/a-67744235>. See also AFP, *Serbia-Bulgaria Interconnector to Reduce Dependence on Russian Gas*, *EURACTIV* (Dec. 11, 2023), <https://www.euractiv.com/section/energy-environment/news/serbia-bulgaria-interconnector-to-reduce-dependence-on-russian-gas/>.

27. Brey, *supra* note 26.

28. Surveys have indicated a majority of Serbs believe Russia is their country’s biggest ally and financial donor, despite significantly larger economic and other aid coming from the West. See Dusan Stojanovic, *Ahead of Visit, Putin Gets Church in Serbia Named after Him*, *ASSOCIATED PRESS* (Jan. 14, 2019), <https://apnews.com/general-news-3d98bcf3c2804462885fac93d816aeae>.

understanding and support.”²⁹ This framing builds in a readymade foothold for messaging and engagement directed by the ROC.³⁰

Thus, beyond Lavrov’s lip service to Russian objectives of peace, security and stability in the region, the Kremlin’s conduct clearly serves the interests of preserving and boosting its own status in the region through a variety of means, including by seeking to diminish the appeal of Western integration.³¹ In the words of one recent EU report, the Balkans “have emerged as a frontline in Russia’s geopolitical confrontation with the West.”³²

The Kremlin advances these self-seeking interests in part by making space for Russian businesses, media outlets and other manifestations of Russian influence, including biker gangs and the ROC, across all forms of public engagement.³³ For example, in the western Balkans alone, Russkiy Mir (“Russian World”) centers exist at the University of Belgrade’s Faculty of Philology, the University of Montenegro, the University of Saints Cyril and Methodius in North Macedonia, and also at a university located in the BiH entity of Republika Srpska (Srpska). In 2021, another formally non-governmental body was inaugurated in Belgrade—the Russian Balkan Center: a joint Russian-Serbian project focused on deepening mutual ties.³⁴ These institutions and programs—often managed in partnership with the ROC and other friendly local churches (particularly the Serbian Orthodox Church and its affiliates),³⁵ as well as other sympathetic national political

29. Ekaterina Chimiris, Olga Pylova, & Alexander Teslya, *Russia in the Balkans*, RUSS. INT’L AFFS. COUNCIL, <https://russiancouncil.ru/en/balkans> (last visited Mar. 15, 2024).

30. Russia’s use of the ROC to gain influence in the Balkans comes with its own long history, including an unproductive Soviet effort to leverage Orthodoxy in the region “to make Moscow the ‘ideological center’ of the Orthodox world.” Tadeusz Czekalski, *Balkan Orthodox Churches in Soviet Union Policy (In the First Years After the Second World War)*, XXX BALCANICA POSNANIENSIA: ACTA ET STUDIA 207, 222 (2023).

31. Blerim Reka, *EU Enlargement and Regional Geopolitics of the Western Balkans*, in GEOPOLITICAL TURMOIL IN THE BALKANS AND EASTERN MEDITERRANEAN, *supra* note 25, at 69.

32. Branislav Stanicek & Anna Caprile, *Russia and the Western Balkans: Geopolitical Confrontation, Economic Influence and Political Interference*, EUR. PARLIAMENTARY RSCH. SERV. 1 (April 2023), [https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/747096/EPRS_BRI\(2023\)747096_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/747096/EPRS_BRI(2023)747096_EN.pdf).

33. Ekaterina Entina, *Russia in the Balkans: The Shadow of Strategic Rivalry*, VALDAI DISCUSSION CLUB (Jan. 22, 2019), <https://valdaiclub.com/a/highlights/russia-in-the-balkans-the-shadow-of-strategic-rival/>. *But see* Maxim Samorukov, *Surviving the War: Russia-Western Balkan Ties After the Invasion of Ukraine*, CARNEGIE ENDOWMENT FOR INT’L PEACE (Apr. 25, 2023), <https://carnegieendowment.org/politika/89600>. According to one recent analysis, Russia’s “token gestures of affinity may achieve a propaganda effect, but they can hardly stymie the decline of real Russia-Balkan cooperation. These efforts lack a coherent strategy and adequate resources to back them. Their aim is not to expand Russian influence in the Balkans, but to sugar-coat the Russian structures in charge to secure the continuation of state financing.”

34. Šćepanović, *supra* note 11, at 1065-66.

35. In a March 2022 resolution, the EU Parliament expressed concern over “attempts by the Orthodox Church in countries such as Serbia, Montenegro, and Bosnia and Herzegovina, especially in its entity Republika Srpska, to promote Russia as a protector of traditional family

figures³⁶—typically lean on the shared historical and religious mission of preserving Orthodox values, empowering sister churches, and fostering brotherhood with Russia.

Coupled with messaging advancing traditional values, these programs also purport to fight off real and imagined “Russophobia” that manifests through the “desecration” of Soviet war monuments and the perceived “falsification” of the Soviet war record. For example, events celebrating Russia’s Immortal Regiment and the St. George Ribbon campaign, which have taken place in the Balkans, and typically involve ROC and allied church representatives, are intended, in the words of Deputy Foreign Minister Grigory Karasin, to “spread objective information to the general public in their countries of residence on the war years’ events.”³⁷ Writing in a Serbian daily newspaper in 2019, Sergei Naryshkin, director of Russia’s Foreign Intelligence Service (SVR), made the shared historical and religious sweep of the Kremlin’s narrative plain:

To Russia and Serbia, the events of WWII are an important reminder not only of the common historical fates of our peoples, of the glorious victories and heavy losses. The essence of the historical mission of Russia and other Slavic states, which is to do everything to keep Europe from fully breaking away from the Christian tradition...is in a certain sense written upon this bloody page of world history.³⁸

Contemporary efforts to boost support for Russia’s status and prestige in the Balkans are systematically grounded in appeals to shared history and religious identity. At the same time, these appeals are also couched in efforts to paint any fostering of deeper Western connections as decidedly harmful. While these individual narratives vary, they can be collected under two primary themes:

values and fortify relations between state and church.” The resolution further expressed alarm “that Hungary and Serbia are helping China and Russia with their geopolitical objectives” and observed that “foreign interference can also be pursued through influence in and the instrumentalisation of religious institutes, such as Russian influence in Orthodox churches ... including by sowing division among local populations, developing a biased writing of history and promoting an anti-EU agenda.” Resolution on Foreign Interference in all Democratic Processes in the European Union, Including Disinformation, Eur. Parl. Doc. P9_TA(2022)0064, ¶¶ 123, 133 (Mar. 9, 2022), https://www.europarl.europa.eu/doceo/document/TA-9-2022-0064_EN.pdf.

36. Harun Karčić, *Russia’s Influence in the Balkans: The Interplay of Religion, Politics, and History*, BERKLEY F. (Jun. 25, 2022), <https://berkeleycenter.georgetown.edu/posts/russia-s-influence-in-the-balkans-the-interplay-of-religion-politics-and-history>.

37. *Meeting of the Pobeda (Victory) Organising Committee*, KREMLIN (April 20, 2017, 17:30), <http://www.en.kremlin.ru/events/councils/54347/>.

38. *Russia’s Historical Mission Is to Keep Europe from Attempts to Make ‘Brave New World’ on Earth—Naryshkin*, INTERFAX (Oct. 22, 2019), <https://interfax.com/newsroom/top-stories/18747/>.

- **Challenging democracy and human rights.** This includes arguments rejecting liberalism and embracing traditional values aligned with Russia; replacing democracy with Russian-style authoritarian populism; emphasizing societal vulnerability to interethnic and inter-religious strife as an attribute of democratization;³⁹ painting human rights as illusory and ineffective at protecting ethnic and religious minorities, women, and the stability of society at large; and attributing ongoing ethnic tensions and violence to the failure of Western institutions.⁴⁰ These narratives are recurring talking points for Russia's MFA, and they appear in more elaborated forms in voluminous reports on neo-Nazism and human rights prepared by the ministry for use in its public diplomacy.⁴¹
- **Forfeiting national sovereignty to Western neo-colonialism.** Integration and/or cooperation with NATO and the EU are discredited as misguided, and are portrayed as coming at the steep cost of lost national sovereignty, culture, and tradition. For example, Lavrov has characterized EU "diktats" to Balkan states as opening a second front against Russia, and as "proof of a desire to foster anti-Russia sentiments" in third countries.⁴² More pointedly, Russia's MFA has characterized Montenegro's NATO membership as leaving "no room for having one's own opinion...those who attempt to pursue a sovereign and independent policy are immediately punished one way or another."⁴³ The Russian MFA further decried Montenegro's quest for EU membership as imposing "a foreign policy...based less on their own national interests, and more on

39. Mieczysław P. Boduszyński & Calla Li, *External Autocratic Influence, the Balkans and Democratic Decline*, in *GEOPOLITICAL TURMOIL IN THE BALKANS AND EASTERN MEDITERRANEAN*, *supra* note 25, at 96.

40. See, e.g., Ahmed Kico, Miralem Kapetanović, & Srđan Šušnica, *The Western Balkans and the War in Ukraine*, ATL. INITIATIVE, Mar. 2022, 15, <https://atlanticinitiative.org/wp-content/uploads/2022/04/THE-WESTERN-BALKANS-AND-THE-WAR-IN-UKRAINE.pdf>.

41. See, e.g., MINISTRY FOREIGN AFFS. RUSS. FED., HUMAN RIGHTS SITUATION IN CERTAIN COUNTRIES (Jun. 6, 2023), https://mid.ru/en/foreign_policy/humanitarian_cooperation/1884435/. See also MINISTRY FOREIGN AFFS. RUSS. FED., REGARDING THE SITUATION WITH THE GLORIFICATION OF NAZISM AND THE SPREAD OF NEO-NAZISM AND OTHER PRACTICES THAT CONTRIBUTE TO FUELING CONTEMPORARY FORMS OF RACISM, RACIAL DISCRIMINATION, XENOPHOBIA AND RELATED INTOLERANCE (Aug. 2022), https://mid.ru/en/foreign_policy/humanitarian_cooperation/1827824/.

42. *Foreign Minister Sergey Lavrov's Interview with the NTV network*, MINISTRY FOREIGN AFFS. RUSS. FED. (Jun. 16, 2022 10:11 PM), https://mid.ru/en/foreign_policy/news/1818292/.

43. *Id.*

submission to Brussels' dominance."⁴⁴ In Lavrov's words: "It has reached the point where Western ruling elites, in violation of the UN Charter, are telling other countries who they should maintain relations with and how. In fact, they are taking these nations' right to national interests and an independent foreign policy away from them."⁴⁵

III. THE ROC'S ROLE IN PROMOTING KREMLIN OBJECTIVES IN THE BALKANS

The ROC serves as an enthusiastic and strident replicator of the Kremlin's policy priorities and narratives in the Balkans. In exchange for its fidelity, the Church secures status and prestige that enhances its influence at home and in the context of its ongoing rivalry with the Ecumenical Patriarchate. The ROC's rhetoric across its myriad diplomatic and religious engagements mirrors and reinforces Kremlin themes, including: ties forged in blood; "brotherly love"; "common Slavic and Orthodox heritage"; the sacralization of Slavic expressions of nationalism; depicting NATO as the destroyer of "Orthodox shrines";⁴⁶ playing up animosities across surrounding states by allusion to historical wrongs; decrying "falsification" of history;⁴⁷ and opposing rapprochement with the EU as an anti-religious and Russophobic threat.⁴⁸

The ROC delivers its support to the Kremlin through Church outlets directly, including its use of blogs, social networks, and traditional media. According to the ROC, it seeks to "build parallel relations with other media and institutions of civil societies of different countries in such a way that our point of view is conveyed to the world community, including parliaments,

44. *Briefing by Foreign Ministry Spokeswoman Maria Zakharova*, MINISTRY FOREIGN AFFS. RUSS. FED. (Apr. 5, 2023), https://mid.ru/en/foreign_policy/news/1862066/.

45. Sergey Lavrov, *Adherence to the UN Charter Principles in Their Entirety and Interconnection Underwrite International Peace and Stability*, MINISTRY FOREIGN AFFS. RUSS. FED. (Oct. 10, 2023), https://mid.ru/en/foreign_policy/news/1908289/. In response to the EU extending candidate status to BiH, Russia's MFA similarly asserted, "The EU has turned pre-accession and accession talks into a tool of economic and political coercion." *Briefing by Foreign Ministry Spokeswoman Maria Zakharova*, MINISTRY FOREIGN AFFS. RUSS. FED. (Dec. 22, 2022), https://mid.ru/en/foreign_policy/news/1845014/.

46. Tatiana Christy, *The Russian Church as Putin's Weapon of Influence*, 34 *NEW AM.*, no. 15, 2018, at 22.

47. In one instance, "Patriarch Kirill directed a six-minute-long harangue at the Bulgarian president for remarks Kirill deemed 'outrages' of historical revisionism that depreciated the primary role of Russian state power and sacrifice." Robert C. Blitt, "*Putin-Phonia*": *Harnessing Russian Orthodoxy to Advance Russia's Secular Foreign Policy*, in *THE GEOPOLITICS OF RELIGIOUS SOFT POWER: HOW STATES USE RELIGION IN FOREIGN POLICY* 49 (Peter Mandaville ed., 2023).

48. In one visit to Bulgaria—an EU member state—Patriarch Kirill used a meeting with the Bulgarian Orthodox Church to appeal to Bulgarians to reject the EU for imposing "behaviours believed to be sinful by Christians and ethically unnatural." *Fraternal Talk between Primates of the Russian and Bulgarian Orthodox Churches*, MOSPAT (May 27, 2014), <https://mospat.ru/en/2014/05/27/news103134/>.

independent human rights movements, [and] confessions.”⁴⁹ This activity includes public diplomacy and religious engagement, often at the highest levels.

In addition to this direct outreach, the ROC also disseminates its messaging across a secondary range of Church-controlled and Church-supported “arm’s length” bodies. These agents duplicate and double down on statements and actions emerging directly from ROC clergy and ROC institutions like the Department of External Church Relations (DECR). Any assessment of ROC support for the Kremlin must incorporate these secondary, church-affiliated organizations to provide a fuller accounting of the ROC’s parallel influence operations. Finally, the ROC engages in a variety of multilateral forums, including the World Council of Churches, where it can press Russia’s case and interests on a global level. This activity often disempowers these collective bodies from speaking out against Russian aggression, or alternatively facilitates swaying them to espouse a more pro-Russian line.

A. ROC Activity Through NGO Affiliates

To reinforce the Kremlin’s message that EU and Council of Europe (CoE) human rights norms are bankrupt, ROC-controlled NGOs⁵⁰ like the Centre for Monitoring the Rights and Freedom of Orthodox Christians in Europe⁵¹ (CMRFOCE) advance a steady narrative that echoes assertions by Russia’s MFA regarding the absence of protections for Orthodox rights and Russian language rights.⁵² Similarly, CMRFOCE often simply regurgitates MFA and other sources, either to boast about the tenacity of the ROC and Serbian Orthodox Church (SOC) in confronting the “endurance test” supposedly inflicted upon Orthodoxy, or to decry alleged Western manipulation of churches in “political games either in Ukraine, or in Montenegro, or in Macedonia.”⁵³ Because CMRFOCE’s connection to the ROC is not immediately apparent, it is able to undertake lobbying actions as a seemingly independent third party actor, all the while echoing ROC and Kremlin objectives, including opposing Kosovo’s 2015 bid for UNESCO

49. Vladimir Emelianenko, *Вахтанг Кипшидзе (РПЦ): «Украинские власти хотят уничтожить православие. А для этого придётся репрессировать большую часть народа»* [Vakhtang Kipshidze (Russian Orthodox Church): “The Ukrainian Authorities Want to Destroy Orthodoxy. And for This It Will Be Necessary to Repress a Large Part of the People.”] RUSSKIY MIR (Oct. 24, 2023), https://russkiymir.ru/publications/319069/?sphrase_id=1569510.

50. A list of ROC organizations (including dioceses and local churches) is available here: <http://www.patriarchia.ru/en/db/organizations/>.

51. The Centre for Monitoring the Rights and Freedom of Orthodox Christians in Europe is operated out of the ROC’s Church of All Saints compound in Strasbourg, France.

52. *UN Human Rights Council Discusses Violation of the Rights of UOC Believers*, ORTHODOXRIGHTS (Sep. 24, 2019), <http://orthodoxrights.org/4005.html>.

53. *Russian Foreign Minister Warned the Orthodox Churches of Dragging in Political Games*, ORTHODOXRIGHTS, (Feb. 18, 2022), <http://orthodoxrights.org/russian-foreign-minister-warned-the-orthodox-churches-of-dragging-in-political-games.html>.

membership.⁵⁴ In a related vein, even as ROC proxies bemoan the claimed inadequacy of rights enforcement mechanisms in Europe, the ROC's Representative Office in Strasbourg, housed in the same compound as the CMRFOCE, disseminates attacks on "European" human rights values, labeling them antithetical to Orthodox traditional values.⁵⁵ Despite this obvious hypocrisy, these types of activity have the effect of further eroding the stability of human rights norms in the European region.

The World Russian People's Council (WRPC), another ROC NGO, boasts the distinction of being chaired by Patriarch Kirill and of benefitting from special consultative status at the UN.⁵⁶ Like the CMRFOCE, the WRPC wields its ostensible independence to echo Kremlin positions globally—including within UN⁵⁷ and OSCE⁵⁸ forums—without implicating the ROC itself. Due partially to this distance, the WRPC often espouses even more muscular perspectives on Kremlin policies. For example, a WRPC forum addressing Russia's foreign policy in the Balkans described the region as "watered with the blood of Russian soldiers and sailors" from 1770 to the Great Patriotic War. Participants proceeded to use this framing to assert the necessity of preventing NATO control and the spread of Russophobia in the "traditionally pro-Russian territory." To counteract this narrative of Western influence, participants advocated supporting any local pro-Russian parties and public organizations, strengthening interaction between the Russian and Serbian Orthodox Churches, lobbying parliaments, media outreach, and developing economic cooperation programs with Russia.⁵⁹

54. Pëllumb Kallaba, *Russian Interference in Kosovo: How and Why?*, KOSOVAR CTR. FOR SEC. STUD., Sept. 2017, at 13, https://qkss.org/images/uploads/files/Russian_interference_in_Kosovo_finale_2_735070.pdf.

55. *Contribution of the Russian Orthodox Church's Representation in Strasbourg to the Public Debate on the Report by the Council of Europe's Group of Eminent Persons "Living Together—Combining Diversity and Freedom in 21st-Century Europe"*, REPRESENTATION RUSS. ORTHODOX CHURCH STRASBOURG [hereinafter REOR], Jul. 11, 2011, <http://strasbourg-reor.org/?topicid=778>.

56. The World Russian People's Council [hereinafter WRPC] is headquartered at the ROC's Danilov Monastery in Moscow. *World Russian People's Council ECOSOC Profile*, U. N. DEP'T ECON. & SOC. AFFS., <https://esango.un.org/civilsociety/showProfileDetail.do?method=showProfileDetails&profileCode=2765>.

57. The WRPC's intervention on Ukraine's Universal Periodic Review at the UN, included in the official stakeholder document, criticized "persecution against the clergy and believers of the Ukrainian Orthodox Church of the Moscow Patriarchate." UN Hum. Rts. Council, *Summary of Stakeholders' Submissions on Ukraine* ¶ 41, Aug. 31, 2017, <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G17/255/15/pdf/G1725515.pdf?OpenElement>.

58. A WRPC intervention at the OSCE decried "discrimination and persecution in the EU of persons who associate themselves with the Russian world and to the aggressively hostile and discriminatory attitude towards them in a number of European and international media." *OSCE Human Dimension Implementation Meeting*, WRPC (Sept. 20, 2017), <https://www.osce.org/files/f/documents/7/2/345901.pdf>.

59. *A meeting of the VRNS International Committee Dedicated to Russia's Foreign Policy in the Balkans Was Held*, WRPC, <https://vrns.ru/news/sostoyalos-zasedanie->

As another example of the ROC's extensive NGO network, Patriarch Kirill has used "The International Foundation for the Unity of Orthodox Christian Nations"⁶⁰ to prop up the status and profile of Milorad Dodik, the President of the BiH entity of Srpska.⁶¹ In a 2014 ceremony, Patriarch Kirill presented Dodik with the "Patriarch Aleksiy II Prize" for "outstanding work to consolidate the unity of Orthodox nations and to promote Christian values in the life of society."⁶² Using this ROC platform to fawn over Dodik served to strengthen the appearance of Eastern Orthodox unity and to signal strong support from Russia. This in turn arguably emboldened Dodik's secessionist efforts, fueling instability in Bosnia, and thus contributing to Kremlin efforts to use Srpska as a wedge for undercutting BiH stability and weakening its Western backers.⁶³ Bringing this dynamic full circle, Dodik later turned to Moscow for support after he defied a BiH Constitutional Court ruling and opted to hold a referendum for Srpska's "Statehood Day."⁶⁴ While Putin offered no more than a photo op, in the words of one observer, "by showing his influence over Dodik, and over the Serbian government, Putin [was] in fact negotiating with his real enemies—the West."⁶⁵ These ties continue to percolate, with Dodik endorsing Russia's 2022 large-scale invasion of

mezhdunarodnogo-komiteta-vrns-posvyashchenoe-vneshney-politike-rossii-na-balka/?sphrase_id=3200.

60. The Foundation was established in April 1995 by ROC Patriarch Aleksiy II. Patriarch Kirill is the current Chairman of the Foundation's Board of Trustees. See *Greetings to International Foundation for Unity of Orthodox Christian Nations*, KREMLIN (Aug. 28, 2020), <http://www.en.kremlin.ru/events/president/news/63957>.

61. Dodik is under US and UK sanctions for obstructing the implementation of the 1995 Dayton Accords. See Hamza Karcic, *Putin's Most Loyal Balkan Client*, FOREIGN POL'Y (Oct. 7, 2022), <https://foreignpolicy.com/2022/10/07/bosnia-elections-milorad-dodik-putin-russia/>.

62. *President of Republic of Srpska Received High Award in Moscow*, SOC (Mar. 12, 2014), http://arhiva.spc.rs/eng/patriarch_kirill_leads_14th_ceremony_awarding_prizes_unity_orthodox_nations_international_foundation.html. At a separate meeting, Dodik expressed gratitude to Patriarch Kirill "for the support you give to the Serbian people and Republika Srpska. The Russian people and the Russian State are the greatest friend and partner of the Serbian people. Such was the case in both the past and the present." *Patriarch Kirill Meets with President of the Republika Srpska*, MOSPAT (Mar. 11, 2014), <https://mospat.ru/en/news/51676/>.

63. IVANA STRADNER, NEW LINES INST., RUSSIA'S INFLUENCE IN THE BALKANS 17 (2023), <https://newlinesinstitute.org/wp-content/uploads/Pages-from-202309014-Essays-Balkans-NLISAP-2.pdf>.

64. Karcic, *supra* note 61.

65. *Russia's Fingers In Bosnia's Pie*, RADIO FREE EUR./ RADIO LIBERTY [hereinafter RFE/RL] (Sep. 28, 2016), <https://www.rferl.org/a/russia-putin-republika-srpska-bosnia-dodik-referendum-statehood-day/28018362.html>. The proposed date coincided with an Orthodox Christian holiday and the 1992 declaration of an independent Bosnian Serb state that triggered three years of war and genocidal violence. BiH High Representative Christian Schmidt has labeled Dodik's effort to celebrate the "Day of Republika Srpska" as "a clear and direct failure" to abide by a final and binding ruling of BiH's Constitutional Court "as well as the decisions of the High Representative"—an "act that constitutes a criminal offense under BiH's Criminal Code." *Rule of Law Is the Foundation of a Stable and Prosperous Future for BiH Citizens*, OFF. OF THE HIGH REPRESENTATIVE (Dec. 20, 2023), <https://www.ohr.int/rule-of-law-is-the-foundation-of-a-stable-and-prosperous-future-for-bih-citizens/>.

Ukraine,⁶⁶ and—during a ceremony marking Srpska’s controversial 2023 national holiday—awarding Putin the highest medal of honor for his “patriotic concern and love for Republika Srpska.”⁶⁷

B. ROC Partnership with Rossotrudnichestvo and “Russkiy Mir”

The ROC and other Orthodox churches often serve as the venue for, or participate in efforts to promote, Kremlin interests advanced by other Russian government agents, including Rossotrudnichestvo (Russia’s Federal Agency for Compatriots Living Abroad and International Humanitarian Cooperation).⁶⁸ While Rossotrudnichestvo’s “storefronts” are ostensibly intended to disseminate Russian culture, its actual activities have come under closer scrutiny. Most recently, for example, Romania ordered the Russian Center for Science and Culture in Bucharest shuttered for operating as “a tool for propaganda, disinformation and justifying the Russian Federation’s war crimes in Ukraine.”⁶⁹

66. *Putin Meets Bosnian Serb Separatist Leader, Praises Serbia*, ASSOCIATED PRESS (Sept. 20, 2023), <https://apnews.com/article/russia-ukraine-putin-serbia-milorad-dodik-european-union-795a26a1d3b9eaeecf780e9e905cab89>.

67. *Bosnian Serbs Award Putin with Medal of Honor*, ASSOCIATED PRESS (Jan. 8, 2023), <https://apnews.com/article/russia-ukraine-putin-politics-government-milorad-dodik-7edc18d0133bbde4c5b84879c0dbe724>. Dodik and the Kremlin are both quick to share their disdain for the Office of the High Representative created by the Dayton Accords. Dodik has rejected the authority of the High Representative by, among other things, seeking to bar him from attending official meetings in the presidential headquarters in Banja Luka. *Dodik Tries to Bar Bosnia’s International Envoy from Meetings in Republika Srpska’s Presidency*, RFE/RL (Sep. 12, 2023), <https://www.rferl.org/a/dodik-tries-to-bar-bosnia-envoy-republika-srpska/32589729.html>. For its part, the Kremlin has rejected the authority of BiH’s Peace Implementation Council to appoint the High Representative, claiming that this power rests with the UN Security Council. *Foreign Ministry Spokeswoman Maria Zakharova’s Answers to Questions from the Financial Times on Bosnia and Herzegovina*, MINISTRY FOREIGN AFFS. RUSS. FED. (Sep. 29, 2021 12:18 PM), https://mid.ru/en/foreign_policy/news/1776806/. As an outgrowth of this position, Russia’s MFA has branded High Representative Schmidt “*samozvannets*”—an imposter, merely a “German citizen [who has] nothing to do with the implementation” of the Dayton Accords: “we know for sure that Christian Schmidt has not served as High Representative for Bosnia and Herzegovina; nor does he have this status today. This position has remained vacant for almost two years now.” *Briefing by Foreign Ministry Spokeswoman Maria Zakharova*, MINISTRY FOREIGN AFFS. RUSS. FED. (Jul. 26, 2023 2:26 PM), https://mid.ru/en/foreign_policy/news/1898513/#q3.

68. Rossotrudnichestvo is subject to EU restrictive measures for “supporting or implementing actions or policies which undermine or threaten the territorial integrity, sovereignty and independence of Ukraine, or stability or security in Ukraine.” Council Regulation 2022/1270, 188, 2022, (L 193) 1 (EU). The agency is also subject to Swiss, Ukrainian, and Canadian sanctions action. See *Federal Agency for Commonwealth of Independent States, Compatriots Living Abroad and for International Humanitarian Cooperation*, OPENSANCTIONS, <https://www.opensanctions.org/entities/NK-aTjZ4DY4TEA XKefa3euuCR/> (last visited Apr. 13, 2024).

69. *Romania Suspends Activity of Russian Center for Culture and Science in Bucharest*, ROM. INSIDER (Feb. 21, 2023), <https://www.romania-insider.com/romania-closes-russian-center-culture-february-2023>. As part of the fallout surrounding the invasion of Ukraine, Finnish authorities shuttered Helsinki’s Russian Center for Science and Culture in April 2023.

Despite this evident stigma, the ROC and its allied churches continue to maintain close collaboration with Russia's agency for compatriots. For example, a SOC church in Montenegro hosted a Rossotrudnichestvo-initiated traveling exhibit, "The Struggle of Serbs and Montenegrins against the Turks 1875-1878 Through the Eyes of Russian volunteers," intended to celebrate the shared history of the three countries.⁷⁰ Russia's ambassador to Montenegro opened a similar Russia House-sponsored exhibition dedicated to Peter I. This event, held at the Matica Srpska, a Serbian cultural institution in Podgorica,⁷¹ similarly sought to emphasize Russia's historical, political, and religious ties to the region, likewise drawing upon the legitimizing presence of SOC Metropolitan Ioanniki of Montenegro and Primorsky.⁷²

The ROC is also central to other aspects of the Kremlin's "Russian World" initiative.⁷³ For example, it supported the "Night Wolves"⁷⁴ road trip that brought motorcyclists from Russia and Serbia through the Balkans, including BiH. According to one ROC Hieromonk, the "Russian Balkans" route followed by the bikers was intended to study and restore the memory of

Russia Responds to Seizure of State Property in Finland, RT (Apr. 19, 2023), <https://www.rt.com/russia/575008-finalnd-arrests-russian-property/>. An investigation in Germany regarding Berlin's Russian House, also operated through Rossotrudnichestvo, similarly sought to shutter the facility. *German Prosecutors Investigate Russia Culture Body*, REUTERS (Jan. 23, 2023), <https://www.reuters.com/world/europe/german-prosecutors-investigate-russia-culture-body-2023-01-23/>. As of this writing, the outcome has been less than decisive. See Derek Scally, *Russia House Cultural Centre Shrugs off Sanctions to Operate in Berlin*, IRISH TIMES (Jul. 26, 2023), <https://www.irishtimes.com/world/europe/2023/07/26/russia-house-cultural-centre-shrugs-off-sanctions-to-operate-in-berlin/>; *The "Russian House" in Berlin Remains Open—Why?*, CNA (Nov. 11, 2023), <https://www.cna.al/english/kosova-bota/shtepia-ruse-neberlin-mbetet-e-hapur-perse-i381459>. Often these centers are housed in the same facility as local Rossotrudnichestvo offices. *Land and Building of Russian Center for Science and Culture Arrested in Helsinki*, RUSSKIY MIR (Apr. 19, 2023), <https://russkiymir.ru/en/news/312515/>.

70. *The Church in Montenegro Received an Exhibition of Works by Russian Artists as a Gift*, RUSSKIY MIR (Aug. 19, 2023), https://russkiymir.ru/news/316773/?sphrase_id=1569509_.

71. For more information concerning this institution, see <https://maticasrpskacg.org/>.

72. *В Черногории открылась выставка, посвященная Петру I [An Exhibition Dedicated to Peter I Opened in Montenegro]*, TASS (Nov. 14, 2022), <https://tass.ru/kultura/16322711>.

73. See *Подписано соглашение о сотрудничестве между Русской Православной Церковью и фондом «Русский мир» [An Agreement on Cooperation between the Russian Orthodox Church and the Russkiy Mir Foundation Is Signed]*, MOSPAT (Nov. 3, 2009), <https://mospat.ru/ru/news/58290/>; Robert C. Blitt, *Whither Secular Bear: The Russian Orthodox Church's Strengthening Influence on Russia's Domestic and Foreign Policy*, FIDES ET LIBERTAS: J. INT'L RELIGIOUS LIBERTY ASS'N 89, 109-112 (2011).

74. As a reward for their efforts, the Night Wolves reportedly received nearly \$200,000 from Russia and the ROC to build a youth center in Sevastopol. Aleksandar Brezar, *Russian biker gang helping increase division in Bosnia Herzegovina*, MEDIUM (Aug. 29, 2019), <https://medium.com/@hitthehybrid/russian-biker-gang-helping-increase-division-in-bosnia-herzegovina-3877eb1caa63>. The Night Wolves Motorcycle Club (and its individual leadership) is subject to U.S. and EU sanctions. See <https://sanctionssearch.ofac.treas.gov/Details.aspx?id=17317>. In the EU, the Night Wolves have been deemed an entity "materially supporting actions" and "implementing actions or policies" undermining Ukraine's territorial integrity, sovereignty, independence, stability, and security" since July 2022. See Council Regulation 2022/1270, 184-85, 2022, (L 193) 1 (EU).

Russia's historical heritage.⁷⁵ The bikers stopped at numerous Orthodox churches and met with local nationalists⁷⁶ under the banner “We have one history and one root.”⁷⁷ Coupled with this religious pilgrimage, the 1,200-mile route also incorporated stops at sites of “military glory associated with the history of the Serbian and Russian peoples.”⁷⁸

In 2022, members of the Night Wolves paid a visit to Patriarch Kirill in Moscow to deliver an icon from Srpska as a gesture of support for the ROC. During the ceremony, the bikers drew a parallel between the “enemies” who separated Kosovo from Serbia and those that now want to “deprive Russia” of Ukraine's Kyiv-Pechersk monastery.⁷⁹ The Patriarch took the opportunity to drive home two messages. First, just like Russia had looked out for Serbs, Montenegrins, and other Slavic people, now these co-religionists were supporting Russia. And second, unlike the Balkan governments being forced to submit to EU and/or NATO diktats, the Balkan people understood “the historical importance of Russia in the struggle for true freedom of peoples. Kirill continued, “Russia is a truly free country, free from any influence of the powerful world centers of power,” and all Slavic peoples “will stand the test of time and we will remain free, Orthodox, loving and respectful peoples.” Kirill ended by invoking the Lord to “protect all Slavic brothers who, together with Russia, are ready to work and work for the true freedom of countries and peoples.”⁸⁰

75. *Участники проекта «Русские Балканы» посетили центры православия и могилы советских солдат* [Participants of the “Russian Balkans” Project Visited Orthodox Centers and Graves of Soviet soldiers], RUSSKIY MIR (Mar. 29, 2018), https://russkiymir.ru/news/239535/?sphrase_id=1569508.

76. Michael Birnbaum, *Russia's Low-Cost Influence Strategy Finds Success in Serbia*, WASH. POST (Oct. 3, 2018), https://www.washingtonpost.com/world/europe/russias-low-cost-influence-strategy-finds-success-in-serbia—with-the-help-of-fighter-jets-media-conspiracies-and-a-biker-gang/2018/10/03/49dbf48e-8f47-11e8-ae59-01880eac5f1d_story.html.

77. *Motorcycle Race “Kulikovo Field—Kosovo Field” to Join Russia and Serbia*, RUSSKIY MIR (Apr. 11, 2018), <https://russkiymir.ru/en/news/240053/>.

78. *Orthodox Biker Club Touring Balkan Monasteries to Promote Orthodox Unity*, ORTHODOX CHRISTIANITY (Mar. 20, 2018), <https://orthochristian.com/111616.html>. At the time, Night Wolves membership in Russia and elsewhere was estimated to surpass 5,000 members. Genka Shikerova & Tony Wesolowsky, *In Bulgaria, an Open Road for Putin's Favorite Biker Gang, the Night Wolves*, RFE/RL (Sep. 4, 2022), <https://www.rferl.org/a/bulgaria-night-wolves-russia-putin/32017720.html>.

79. Mike Eckel, *Holy Eviction: What's Going on with the Standoff at Kyiv's Famous Monastery of the Caves?*, RFE/RL (Mar. 31, 2012), <https://www.rferl.org/a/ukraine-kyiv-pechersk-lavra-standoff-monastery-russia-monks/32343746.html>.

80. *Члены Всероссийского мотоклуба «Ночные волки» передали Святейшему Патриарху Кириллу икону святителя Петра Цетиньского* [Members of the All-Russian Motorcycle Club “Night Wolves” Handed over the Icon of St. Peter of Cetinje to His Holiness Patriarch Kirill], WRPC (Jun. 1, 2022), https://vms.ru/news/chleny-vserossiyskogo-motokluba-nochnye-volki-peredali-svyateyshemu-patriarkhu-kirillu-ikonu-svyatitit/?sphrase_id=3204; *Члены мотоклуба «Ночные волки» передали Святейшему Патриарху икону святителя Петра Цетиньского* [Members of the “Night Wolves” Motorcycle Club Handed over to His Holiness the Patriarch Icon of St. Peter of Cetinje], YOUTUBE (Jun. 1, 2022), <https://www.youtube.com/watch?v=KnI5LelMiLE>.

C. ROC Institutions and Officials—Direct Action

In tandem with its NGO and related activities, ROC institutions and officials directly disseminate and seek to build support for Kremlin positions across a range of engagements, including in interactions with other churches. For example, when celebrating former Serbian Patriarch Irinej, Kirill chose to emphasize in particular the Patriarch's efforts on behalf of his "long-suffering flock in Kosovo and Metohija, in Montenegro and in every place where the Serbian Orthodoxy is being subjected to attacks."⁸¹ This framing of Serbs as under attack readily reinforced the Kremlin's efforts to push inter-ethnic and inter-religious tension to the front burner while burnishing its own reputation as a defender of Orthodoxy⁸² and national history, culture, and traditions in the face of radical European neoliberal values.⁸³

This intimate relationship between the ROC and the SOC—and its use as a conduit for Russian influence—should not be understated.⁸⁴ One recent analysis of Russia's activity in the Balkans concluded that "[b]y far the most important role in shifting opinion in the direction of Russia's interests (i.e. in the Russification of narratives and identities for patriotic populations in Serbia, Montenegro, Northern Macedonia and part of BiH) is played by the Church of Serbia."⁸⁵ But the ROC's networks and connections in the Balkans do not end with its access to the SOC.

For example, during a 2018 visit to Bulgaria, Patriarch Kirill celebrated the ROC's historical contribution to the buildup of Russian public support in favor of the Tsarist war against Turkey, intended to liberate Bulgaria from the Ottoman yoke. The death of thousands of Tsarist soldiers,⁸⁶ Kirill reasoned,

81. *His Holiness Patriarch Kirill Greets Primate of Serbian Orthodox Church with 10th anniversary of Enthronement*, MOSPAT (Jan. 23, 2020), <https://mospat.ru/en/news/45751/>.

82. This narrative is repeated in various settings. For example, the Interparliamentary Assembly on Orthodoxy (IAO) is a faith-based international organization that brings together parliamentarians from states with significant Orthodox populations to leverage their common views to help shape and address contemporary global challenges. The IAO's founding charter "[calls] on the Russian Federation, as the only Orthodox member of the Security Council of the United Nations, to defend in the Council the common interests of the Orthodox peoples and not to permit any discrimination against them." It further declares as one objective "better utilisation of the role played by Greece and Russia in the European Union and in the United Nations Security Council respectively for the upgrading and affirmation of the significant unifying role of Orthodoxy." *Founding Act of the European Interparliamentary Assembly on Orthodoxy [IAO]*, preamble, art. 3(g) (Nov. 1994), <https://eiao.org/statutory-texts/> (The European Interparliamentary Assembly on Orthodoxy is the IAO's previous name).

83. *Head of Russian Ministry of Foreign Affairs Meets with Primate of Serbian Orthodox Church*, MOSPAT (Jun. 18, 2020), <https://mospat.ru/en/news/45514/>.

84. The SOC's "friendship with Russia in which national Orthodox Churches played crucial roles has been successfully maintained ever since the early 1970s and upgraded after the fall of communism." Perica, *supra* note 12, at 191.

85. Kico, et al., *supra* note 40, at 15.

86. While the Tsarist army was multiethnic, ROC materials often focus on Russian soldiers exclusively. See, e.g., *His Holiness Patriarch Kirill of Moscow and All Russia and His Holiness Patriarch Neophyte of Bulgaria Meet with Bulgarian Prime Minister Boyko Borissov*, MOSPAT (Mar. 3, 2018), <https://mospat.ru/en/news/47631/> (emphasizing how "the participation

was a worthy sacrifice “for our brothers in faith.”⁸⁷ Similarly, in a 2017 visit to Romania, Kirill observed: “We Orthodox Christians live in different countries, but we should know we have shared values. This means we have an extraordinary potential for cooperation and interaction. The good relations between people can happen only if they have shared values.”⁸⁸

Countless visits like these to the region from various ROC officials emphasize the same shared themes: The obligation to preserve unsullied the USSR’s “Great Patriotic Victory”; the historical debt supposedly owed to Russia; and traditional Orthodox values as a shield against anti-Christian, anti-Russian (Western) forces.⁸⁹ This messaging is reinforced by regular ROC events staged at various monuments and historical sites linked to Russia’s or the USSR’s role in the Balkans. For example, in 2019, the head of the ROC’s Department for External Church Relations (DECR) and Bulgarian Orthodox Church (BOC) officials visited “the burial place of the Russian soldiers who died in the Russo-Turkish war for the liberation of Bulgaria...and sang ‘Memory Eternal.’”⁹⁰ Alongside these overtly religious events, the ROC organizes more “secular” academic gatherings to highlight the importance of Orthodox bonds, manifested “in the motivation of the fighters for liberation of Bulgarian people from foreign yokes,” as well as the contribution of many ROC and BOC clerics to Bulgaria’s liberation.⁹¹

Beyond outreach to other clergy and religious scholars, other ROC events typically reach civic and political leaders, as well as the public at

of Russia and the Russian soldiers in the hard struggle for [Bulgaria’s] national liberation proves that the Orthodox faith, uniting the two fraternal peoples, is a great spiritual force” and quoting Patriarch Kirill as “happy...to hear [how] Bulgaria cherishes [the] grateful memory of the sacrificial heroic deed of the Russian people.”); *Russian and Bulgarian Soldiers Who Fought for Liberation of Bulgaria Are Commemorated on Shipka Pass*, MOSPAT (Mar. 3, 2021), <https://mospat.ru/en/news/86643/> (noting a ROC visit to “Shipka Pass where the Russian soldiers are buried who gave their lives for the liberation of Bulgaria” and a “requiem service for the Russian and Bulgarian soldiers.”).

87. *Patriarch Kirill: Russia Always Treated Bulgaria Like Its Fraternal Nation*, RUSKIY MIR (Mar. 1, 2018), <https://russkiymir.ru/en/news/238433/>. These visits often reinforce separate meetings held by Russian ambassadors with local Orthodox churches. *See, e.g., Head of Russian Ministry of Foreign Affairs meets with Primate of Serbian Orthodox Church*, MOSPAT (Jun. 18, 2020), <https://mospat.ru/en/news/45514/>; *The Bulgarian Patriarch Neophyte Met the Ambassador of Russia*, BULGARIAN ORTHODOX CHURCH (Dec. 9, 2021), <https://bg-patriarshia.bg/en/news/the-bulgarian-patriarch-neophyte-met-the-ambassador-of-russi>.

88. *Russian Orthodox Church Patriarch in Romania for First Post-1989 Visit*, ROM. INSIDER (Oct. 27, 2017), <https://www.romania-insider.com/russian-patriarch-romania-visit-2017>.

89. *See, e.g., Appeal of the Supreme Church Council of the Russian Orthodox Church*, MOSPAT (Apr. 3, 2012), <https://mospat.ru/en/news/54363/> (noting that anti-church forces include “those who promote false values of aggressive liberalism” and advocate a “political hidden motive, including an anti-Russian one.”).

90. *Metropolitan Hilarion Takes Part in Theological Conference at Veliko Tarnovo*, PATRIARCHIA (Oct. 11, 2019), <http://www.patriarchia.ru/en/db/text/5512184.html>.

91. *DECR Deputy Chairman Takes Part in Scholarly Conference on the Role of Orthodox Church in the Liberation of Bulgaria from the Ottoman Rule*, PATRIARCHIA (Dec. 11, 2019), <http://www.patriarchia.ru/en/db/text/5547551.html>.

large.⁹² For example, in August 2023, ROC Metropolitan Hilarion (formerly head of DECR) traveled to Croatia at the invitation of SOC Bishop Jovan of Pakrac and Slavonia. A welcoming reception hosted by the Serbian ambassador to Croatia included the former president of Croatia, the Apostolic Nuncio to Croatia, president of the Croatian Conference of Bishops, and other members of the diplomatic corps. At a separate service, at the site of the Jasenovac concentration camp where Croatian Ustashe fascists murdered tens of thousands of Serbs, Hilarion reached back to the legacies of WWII to observe that the Orthodox “martyrs of Jasenovac died an awful death, and the Church holds their sufferings as a great deed.”⁹³ These supportive acts on behalf of Serbia, seemingly innocuous but profoundly symbolic, contribute to fueling Croatian-Serb tension, which can and does spill over into contemporary relations including, for example, the SOC’s express opposition to Croatian government policies, including the regulation of Cyrillic script.⁹⁴

One recent episode in Bulgaria drives home how the ROC and Kremlin operate to mutually reinforce shared narratives. Following Bulgaria’s expulsion of ROC clergy and staff from a Russian metochion on charges of espionage,⁹⁵ DECR blasted the move as:

an outrageous act dictated by Russophobic motives and the desire to erase the glorious pages of the common history of Bulgaria and Russia...The crude measures of police arbitrariness...aimed at undermining the traditionally friendly relationship between the two sister Churches, aim to set fraternal nations against each other, nations who are tied together by a common history and a single faith.⁹⁶

92. A typical event gathers local leaders, ambassadors, public figures, Russian officials from Rosstrudnichestvo, and others. See *The Memory of Russian Soldiers Who Fought for Liberation of Plevna in 1877 Honoured in Bulgaria*, PATRIARCHIA (Dec. 13, 2021), <http://www.patriarchia.ru/en/db/text/5872054.html>; See also *Representative of Russian Church Takes Part in Dedication Day at the Church of St Nedelya the Great Martyr in Sofia*, PATRIARCHIA (Jul. 8, 2021), <http://www.patriarchia.ru/en/db/text/5828145.html>.

93. *Metropolitan Hilarion of Budapest and Hungary Officiates at Commemoration of the New Martyrs of Jasenovac*, MOSPAT (Aug. 2, 2023), <https://mospat.ru/en/news/90698/>. Metropolitan Hilarion was joined by hierarchs of the Macedonian Orthodox Church, the SOC, and Bishop Job of Stuttgart of the Russian Orthodox Church Outside of Russia (ROCOR). The Primates of the Russian and Serbian Orthodox Churches were commemorated during the service. See *Bishop Job of Stuttgart Participates in the Conciliar Celebration of the Divine Liturgy at Jasenovac Monastery*, RUSS. ORTHODOX CHURCH OUTSIDE RUSS. [hereinafter ROCOR] (Sep. 5, 2023), https://www.synod.com/synod/eng2023/20230905_encroatia.html/.

94. *In Croatia Nothing New—Again and Again about the Cyrillic Script*, SOC (Oct. 12, 2023), <https://spc.rs/en/in-croatia-nothing-new-again-and-again-about-the-cyrilic-script-about-the-cyrilic-script/>.

95. Antoaneta Roussi, *Bulgaria kicks out Russian Church Boss*, POLITICO (Sep. 21, 2023), <https://www.politico.eu/article/bulgaria-kicks-out-russian-orthodox-church-head-over-espionage-claims/>.

96. See *Statement by the Communications Service of the Department for External Church Relations on the Expulsion by the Bulgarian Authorities of the Dean of the Metochion*

For his part, Kirill, in a letter to the BOC Patriarch, vowed “that the political forces supported by the enemy of the human race would not tear apart the centuries-old ties of love and brotherhood in Christ that form the basis of cooperation between the Russian and Bulgarian Orthodox Churches.”⁹⁷

Echoes of the ROC’s view emanated from two other sources. First, the World Russian People’s Council decried “The brutal measure of police arbitrariness” designed to undermine “traditionally friendly relations [and] to incite fraternal peoples connected by a common history and a common faith against each other...[the ROC and BOC] will not give up the historical memory of our peoples.”⁹⁸ Second, Nikolai Malinov,⁹⁹ the chairman of both Bulgaria’s “National Movement of Russophiles” and the newly inaugurated “International Movement of Russophiles” (MIR)¹⁰⁰ offered a similar take, only infused with a more direct attack on the West. In Malinov’s words, the shuttering of the church signaled a Western effort to strike a blow against Orthodoxy in Bulgaria: “Many do not understand how important this is....

of the Russian Orthodox Church in Sofia, PATRIARCHIA (Sep. 21, 2023), <http://www.patriarchia.ru/en/db/text/6061647.html>; see also В России возмущены высылкой из Болгарии священников РПЦ [*Russia is Outraged by the Expulsion of Russian Orthodox Church Priests from Bulgaria*], RUSSKIY MIR (Sep. 22, 2023), <https://russkiymir.ru/news/317955/>.

97. *His Holiness Patriarch Kirill Replies to the Appeal by His Holiness the Patriarch of Bulgaria Neophyte Regarding the Russian Church Building in Sofia*, MOSPAT (Oct. 4, 2023), <https://mospat.ru/en/news/90851/> (Kirill’s reference may allude to scripture (1 Thessalonians 2:15), but it also echoes the international law term *Hostis Humani Generis*, “the enemy of all mankind,” used to denote crimes against all humanity (e.g., piracy, slavery, torture).).

98. *Заявление Службы коммуникации ОБЦС в связи с высылкой властями Болгарии настоятеля подворья Русской Православной Церкви в Софии* [*Russia is Outraged by the Expulsion of Russian Orthodox Church Priests from Bulgaria*], WRPC (Sep. 21, 2023), https://vrns.ru/news/zayavlenie-sluzhby-kommunikatsii-ovtss-v-svyazi-s-vysylkoy-vlastyami-bolgarii-nastoyatelya-podvorya-/?sphrase_id=3200.

99. Malinov is a former Bulgarian lawmaker accused of spying for Russia. He is also under U.S. sanctions for corruption. While awaiting his trial in Bulgaria, Malinov traveled to Russia where President Putin presented him with the Russian Order of Friendship. See *Bulgarian Ex-Lawmaker Accused of Spying for Russia Elected Chief of Moscow-Backed Group*, RFE/RL (Mar. 15, 2023), <https://www.rferl.org/a/bulgaria-mp-malinov-spying-russia-elected-moscow-group/32319655.html>. Malinov also has ties to Russian oligarch Konstantin Malofeev. For more on Malofeev see *infra* notes 247 & 251.

100. *Nikolai Malinov Headed International Movement of Russophiles*, RUSSKIY MIR (Mar. 15, 2023), <https://russkiymir.ru/en/news/311298/>; Alla Shelyapina, “*A Child Was Born, Now Our Task Is to Raise Him.*” *Moscow Establishes the International Russophile Movement*, RUSSKIY MIR (Mar. 19, 2023), <https://russkiymir.ru/en/publications/311418/>. See also *Greetings on the Opening of the International Russophile Movement Founding Congress*, KREMLIN (Mar. 14, 2023), <http://www.en.kremlin.ru/events/president/news/70672>. At the MIR’s inauguration, Patriarch Kirill tore a page from Russia’s MFA by proclaiming that the purpose of the new movement was to spread Russian culture, confront Russophobia in its various manifestations, and strengthen “people’s diplomacy” in defense of a multipolar, calm and harmonious world. See *Учредительный съезд* [*Constituent Congress*], MOUVEMENT INTERNATIONALE RUSSOPHILE (Mar. 14, 2023), <https://mir2023.site/uchreditelnyj-sezd/>. The French acronym MIR (Mouvement Internationale Russophile) also translates into the Russian word for “world” or “peace.”

But we, Orthodox Slavs in Bulgaria, are putting it up. They are trying to seize Russian property. Liberalism has entered its last stage—fascism.”¹⁰¹ Unsurprisingly, there is little variance in messaging among Malinov, the MIR, the WPRC, and the ROC.¹⁰²

Pulling all these seemingly independent voices together, Russia’s MFA predictably staked out the same view on Bulgarian measures against the ROC church: “the current leadership of Bulgaria has clearly embarked on a path of destroying not only political contacts between our states, but also cultural and humanitarian ties between our peoples. Their current goal appears to be severing relations between the sisterly Russian and Bulgarian Orthodox Churches, and the fraternal ties between the Russian and Bulgarian peoples.”¹⁰³

101. *Николай Малинов: Многие жители Болгарии сопротивляются антироссийскому курсу властей* [Nicolay Malinov: Many Bulgarians Resist the anti-Russian Policy of the Authorities], RUSSKIY MIR (Oct. 4, 2023), https://russkiymir.ru/news/318404/?sphrase_id=1569510.

102. A MIR event in Bulgaria in September 2023 opened with a BOC-led celebration of the liturgy in front of the Shipka Freedom Monument (commemorating Russians and Bulgarians who defended the area during the 1877-78 Russo-Turkish War), a blessing from BOC Metropolitan Nicholas of Plovdiv, and with clergy offering an additional Orthodox prayer prior to the main event. See *Более 5000 участников собрались на I международном Соборе русофилов «С Россией в сердце» в Болгарии (+видео)* [More than 5000 Participants Gathered at the First International Council of Russophiles “With Russia in the Heart” in Bulgaria (+Video)], MOUVEMENT INTERNATIONALE RUSSOPHILE (Sep. 16, 2023), <https://mir2023.site/2023/09/16/bolee-5000-uchastnikov-sobralis-na-pervom-mezhdunarodn-om-sobore-rusofilov-s-rossiej-v-serdce-v-bolgarii/>; *Събор на русофили в Калофер* Официална част [Gathering of Russophiles in Kalofer, Official Section], YOUTUBE (Sep. 16, 2023), <https://www.youtube.com/watch?v=1JLRMFaD5QA> (For his remarks, Malinov accused Bulgaria’s “ruling political elite” of attempting to maliciously push apart the people, destroy “symbols, monuments, history and centuries-old love for Russia,” and further claimed Bulgaria was preparing to go to war with Russia and was being prepared for a “Bulgarian Maidan.” A statement by Russia’s MFA saluted the MIR event as “clear confirmation that Russophobic sentiments in Bulgaria are common only in part of the political elite of the country, and the Bulgarian people themselves remain faithful to traditions and centuries-old friendly relations with Russia. This is due to the spiritual and cultural proximity of our two peoples.”). See also *Foreign Minister Sergey Lavrov’s Greetings to Participants in the 18th National and 1st International Russophile Council*, MINISTRY FOREIGN AFFS. RUSS. FED. (Sep. 16, 2023 6:46 PM), https://mid.ru/en/foreign_policy/news/1904770/.

103. *Comment by Foreign Ministry Spokeswoman Maria Zakharova Regarding the Expulsion of Russian Orthodox Church Priests from Bulgaria*, MINISTRY FOREIGN AFFS. RUSS. FED. (Sept. 21, 2023). https://www.mid.ru/ru/foreign_policy/news/1905499/?lang=en. Some observers question the BOC’s ability to engage in cultural wars or influence dynamics given its ongoing internal dysfunction. This may tilt the BOC in favor of the West. Oleg Kobtzeff, *The Geopolitics of the Orthodox Church in the Balkans*, in *GEOPOLITICAL TURMOIL IN THE BALKANS AND EASTERN MEDITERRANEAN*, *supra* note 25, at 145-148. This dysfunction is reflected in the BOC’s inability to muster a unanimous response to the shuttering of the Russian metochion. David I. Klein, *Fate of Historic Sofia Church Unclear as Bulgaria Accuses Abbot of Spying for Russia*, RELIGION NEWS SERV. (Oct. 4, 2023), <https://religionnews.com/2023/10/04/fate-of-historic-sofia-church-unclear-as-bulgaria-accuses-its-abbot-of-spying-for-russia/>. Dysfunction is further discernable in the BOC’s inconsistent external relations, where, for example, it is notably not a member church of the World Council of Churches. *Member*

The Kremlin and ROC have harnessed the themes of Russophobia, tearing fraternal brothers apart, and erasing or challenging common history elsewhere to advance Russia's international position. Perhaps most destructively, this was done in the lead up to (and during) Russia's ongoing war against Ukraine. Importantly, Russia has invariably painted the West as the instigator for each of these problems in Ukraine; and, as demonstrated here, Russia's narrative in the Balkan region assigns the West the same blame.

Plainly, ROC engagement in the Balkans is not restricted to religious audiences or interlocutors. At a meeting with former Serbian president Tomislav Nikolic, Patriarch Kirill invoked "shared history"—ancient and more recent—as an unerasable basis for the bond between the two nations:

historical facts cannot be erased from people's memory, no matter how history is rewritten. [Russia and Serbia are] connected by history, faith, blood...we either won and rejoiced together, or suffered together.... In recent times, we have suffered from our hearts together with the Serbian people when your country was bombed by NATO, and today we empathize with the Serbian population in Kosovo and Metohija and help as much as we can.¹⁰⁴

Similarly, during a 2021 meeting with Romania's ambassador to Russia, Kirill asserted: "Our nations are united by a common faith, a similar culture and traditions. This factor certainly should influence the relations between Romania and Russia as states, and the secular authorities should seriously take into account the fact that we are two fraternal Orthodox nations."¹⁰⁵

Beyond outreach to Serbia and other Balkan states, the ROC's Representative Office in Strasbourg (REOR)¹⁰⁶ evidences the same political initiative, only using Orthodoxy as a springboard to build support within broader EU political circles for Kremlin policies that implicate the region at large. To this end, the deputy head of REOR described its main objectives as:

1) Creating, in the European Parliament, an "Orthodox international group" comprising Bulgarian, Greek, Cypriot, and Romanian as

Churches, WORLD COUNCIL OF CHURCHES [hereinafter WCC] <https://www.oikoumene.org/member-churches> (last visited Apr. 14, 2024).

104. *Head of VRNS, Patriarch Kirill: History Cannot Be Rewritten*, WRPC https://vrns.ru/news/glava-vrns-patriarkh-kirill-istoriyu-nevozmozhno-perepisat/?sphrase_id=3203 (last visited Apr. 14, 2024).

105. *His Holiness Patriarch Kirill Meets with Romania's Ambassador to Russia*, PATRIARCHIA (Nov. 30, 2021), <http://www.patriarchia.ru/en/db/text/5868574.html>.

106. Святейший Патриарх Кирилл обратился к религиозным деятелям и представителям международных организаций в связи с рассмотрением Верховной Радой Украины законопроекта № 8371 [His Holiness Patriarch Kirill Appeals to Religious Leaders and Representatives of International Organizations in Connection with the Consideration by the Verkhovna Rada of Ukraine of Draft Law No. 8371], REOR (Dec. 24, 2023), <http://strasbourg-reor.org/?topicid=1369>.

well as Latvian and Estonian-Russian speaking members of the European Parliament;

- 2) Establishing strong ties with the largest EU political party;
- 3) Deepening the dialogue between the largest EU political party, the ROC, and Russia's ruling political party "United Russia"; and
- 4) Securing inclusion of the Russian language into the list of the EU's official languages.¹⁰⁷

Coupled with its direct political engagement, the ROC also maintains arteks¹⁰⁸—Orthodox youth camps—in Montenegro and Bulgaria. These camp programs targeting youth are another example of spaces where the ROC can transmit and inculcate the Kremlin's religious and political messages to target groups in the Balkans. According to the ROC, "Bulgaria was...chosen because it's cheap. And we are focused on making vouchers available to people. And also because it's a Slavic Orthodox country.... Now the [ROC] pilgrimage center...plans to create a whole line of such camps. Some of them will even be year-round. Priority is given to countries with Orthodox faith—Cyprus, Greece. But maybe one of the camps will be opened in Israel."¹⁰⁹

D. ROC Activity in Multilateral Forums

The ROC's ongoing participation in international religious organizations and forums has resulted in these groups being prevented from acting independently of Russia's influence. This is the case as it relates to the Balkans generally, but equally in other broad policy and geographic contexts. The case of the World Council of Churches (WCC) is instructive. The WCC is by far the largest interdenominational Christian organization in existence. According to one observer, the WCC historically has been "a significant moral force in the international community, espousing solidarity with the world's poor and oppressed and highlighting a wide range of major issues such as racism, the status of women, needy children, migrant workers, refugees, global warming, and the arms race."¹¹⁰ Yet this selfless image breaks down, particularly around the issues of human rights, traditional values, and advocacy of Orthodox interests, when taking stock of the ROC's activity since it joined the WCC in 1961.¹¹¹ Together with the SOC and its

107. Viktor Yelenskiy, "Then What Are We Fighting For": Securitizing Religion in the Ukrainian-Russian Conflict, 41 OCCASIONAL PAPERS ON RELIGION E. EUR., no.6, 2021, at 19.

108. Arteks were Soviet era camps for children. The Artek international children's center in Russian-occupied Crimea is subject to sanctions. *Sanctions List Search*, OFAC, <https://sanctionssearch.ofac.treas.gov/Details.aspx?id=44682> (last visited Apr. 14, 2024).

109. *Русский православный «Артек» откроется в Болгарии* [Russian Orthodox "Artek" Will Open in Bulgaria], WRPC, https://vrns.ru/news/russkiy-pravoslavnyy-artek-otkroetsya-v-bolgarii/?sphrase_id=3204 (last visited Apr. 14, 2024).

110. John T.S. Madeley & Jeffrey Haynes, *Transnational Religious Actors*, in THE ASHGATE RESEARCH COMPANION TO NON-STATE ACTORS 63, 66 (Bob Reinalda ed., 2011).

111. The ROC "was completely cut off from any form of contact with the rest of Christianity" following the Russian Revolution of 1917 and through the Second World War, and did not participate in the establishment of the WCC in 1948. J.A. Hebly, *The State, the*

other allied churches, the ROC has left an indelible imprint on the WCC's effectiveness and its ability to navigate policy issues that implicate Russian interests and the West.

Following World War II, the ROC regarded the WCC as having an “absolutely pro-Western character in [its] structure, activity and socio-political orientation.”¹¹² This position, however, gradually moderated itself during the 1950s, as WCC efforts to be more inviting of Eastern Orthodox churches enabled, in the ROC's view, the “preservation of the ecclesiology of a particular church and prevent[ed] the imposition of particular doctrines of Christian unity on others.”¹¹³ With this shift, the ROC came to view the WCC's “approach to the East-West problem” to be “more constructive and realistic.”¹¹⁴ Not coincidentally, the ROC's interest in “further expand[ing] its international contacts” aligned with Kremlin strategy, “which sought to instrumentalise such ecclesiastical contacts to boost the Soviet Union's international legitimacy and prestige.”¹¹⁵ The KGB, consolidating its infiltration of the ROC, handpicked Metropolitan Nikodim to be installed as head of the DECR and to serve as the Church's representative to the WCC.¹¹⁶ Shortly thereafter, the ROC officially joined the organization in 1961, and initiated what would become “the overture to a suddenly more active participation in international church life,”¹¹⁷ from which position the ROC could “fight...reactionary forces in the oikumene...represent socialist

Church, and the Oikumene: The Russian Orthodox Church and the World Council of Churches, 1948-1985, in RELIGIOUS POLICY IN THE SOVIET UNION 107 (Sabrina Petra Ramet ed., 1992); “Indeed, Stalin's wariness of any organization he could not fully control meant that no Russian or Eastern European satellite churches attended the first WCC gathering in 1948.” Jeffrey Kaplan, *More East than West: The World Council of Churches at the Dawn of the Cold War*, 31 TERRORISM & POL. VIOLENCE 33, 37 (2019).

112. Ioann Sviridov, *25 Years of the Russian Orthodox Church in WCC Membership*, 39 ECUMENICAL REV. 346, 348 (1987).

113. *Id.* The first ecumenical leader to travel to the Soviet Union in 1952 sought to ascertain whether “the Russian Church [was] a servant of Stalin first or of Christ first.” Hebly, *supra* note 111, at 110.

114. Sviridov, *supra* note 112, at 348.

115. Bastiaan Bouwman, *Between Dialogue and Denunciation: The World Council of Churches, Religious Freedom, and Human Rights during the Cold War*, 31 CONTEMPORARY EUR. HISTORY 15, 21 (2022). Bouwman concludes “the WCC's reticence to publicly support Soviet dissidents damaged its credibility as a truly global voice for human rights.” *Id.* at 30.

116. Felix Corley, *The Svyatoslav Files: Metropolitan Nikodim and the KGB* (2018). See also Sabrina P. Ramet, *The Way We Were—and Should Be Again? European Orthodox Churches and the “Idyllic Past,”* in RELIGION IN AN EXPANDING EUROPE 149 (Timothy A. Byrnes & Peter J. Katzenstein eds., 2006) (observing “the Russian Orthodox and Bulgarian Orthodox Churches joined the World Council of Churches...on orders from their respective governments in order to defend communist interests.”).

117. Hebly, *supra* note 111, at 105. For another historical account of the ROC's early approach to post-war ecumenism, see Edmund Schlink, *The Ecumenical Contribution of the Russian Orthodox Church*, SCOT. J. THEOLOGY 41, 42 & 49 (1959) (observing “though there has been no direct positive ecumenical contribution so far from the Church of the Moscow Patriarchate,” and the ROC may not be free to speak on social or political questions, “it seems...wrong to see in the Russian Church when it speaks of peace and seeks international contacts merely an organ of Soviet propaganda and politics.”).

positions...blunt anti-communist tendencies” and “change [the WCC] into an ally in the struggle for worldwide social revolution.”¹¹⁸

As much as Nikodim praised WCC membership as enabling the ROC to “bear witness to her Orthodoxy and to maintain cooperation with other Christian churches,”¹¹⁹ the Church quickly leveraged its newfound status together with other Eastern bloc churches¹²⁰ “to spread Soviet propaganda...and also to thwart attempts by the WCC to criticize the Soviet Union for violating the rights of believers, including Orthodox believers.”¹²¹ ROC representatives to the WCC regularly sought to “conceal the extent of antireligious activity in the USSR,” and to preempt petitions communicated “by those persecuted for their faith by characterizing their authors as unrepresentative of the Soviet Christian community or motivated by anti-Soviet political sentiments.”¹²² This lobbying effort often resulted in Western churches failing to unite “to condemn religious persecution behind the Iron Curtain.”¹²³ Assessing the WCC’s endeavors during the Soviet era, Michael Bourdeaux damningly concluded:

It is only realistic to suggest that the WCC policy towards the Soviet Union has failed....[T]he keynote has been appeasement. It is not too much to say that [WCC] policy has misled [its] worldwide membership...on the real situation of Soviet believers. If the aim of [WCC policy] was to alleviate the lot of the persecuted, it has failed.¹²⁴

118. Hebly, *supra* note 111, at 112.

119. Sviridov, *supra* note 112, at 349-350. This ROC perspective is at odds with the view espoused by Church dissidents such as Fr. Gleb Yakunin and Lev Regelson, who wrote to the WCC that the ROC’s membership “was sanctioned by the government during the period of the extremely brutal persecution of religion, and obviously followed the government’s own strategic aims, quite remote from any consolidation of Christian positions in the modern world.” Quoted in Hebly, *supra* note 111, at 111.

120. “The influx of Russian churches and their KGB compatriots changed the [WCC’s] voting pattern and enforced a far more rigid control of Soviet Bloc churchmen...Thus, each subsequent [WCC] Assembly would reflect to ever greater degrees Soviet propaganda themes.” Kaplan, *supra* note 111, at 40.

121. Nikolai Mitrokhin, *The Church, Ethnonationalism, and the State*, 52 *RUSS. POL. & L.*, no. 5, 2014, at 45. Orthodox churches within the WCC have also used their position to demand certain internal reforms of the council. For example, “at the WCC’s 1991 assembly at Canberra, Australia, Orthodox clerics threatened to abandon the organization unless there was a return to more biblically rooted ethics.” Shortly thereafter, “the WCC slid into deep crisis in the course of 1997-98, when the Georgian and Bulgarian Orthodox Churches decided to terminate their association with that body.” Ramet, *supra* note 116, at 156. Similar anti-ecumenical efforts continued into the 2000s.

122. Philip Walters, *The Russian Orthodox Church and the Soviet State*, 483 *ANNALS AM. ACAD. POL. & SOC. SCI.* 135, 139 (1986).

123. Lucian N. Leustean, *Eastern Christianity and the Cold War: An Overview*, in *EASTERN CHRISTIANITY AND THE COLD WAR, 1945-91*, *supra* note 5, at 8.

124. Michael Bourdeaux, *The Russian Church, Religious Liberty and the World Council of Churches*, 13 *RELIGION IN COMMUNIST LANDS*, no.1, 1985, at 26. Bouwman phrases Bourdeaux’s criticism more delicately: “the WCC’s commitment to ecclesiastical diplomacy

As the largest of the WCC's member churches,¹²⁵ the ROC's influence within the organization is only enhanced by the presence of other allied Orthodox churches, including the SOC. Together, these churches have continued to leverage the WCC's thirst for ecumenical legitimacy¹²⁶ to advance policy objectives linked to state interests even after the demise of communism. In the early 1990s, the Serbian church intentionally followed a double strategy:

[joining] common appeals for peace...[while] the patriarch and many of his bishops were simultaneously carrying out an inordinately virulent campaign against Croatia.... Even at international ecumenical conferences...Serbian bishops appeared with Janus-faced statements: they would, for example, state that not only the West but 'all are guilty and all are victims,' only to declare immediately afterwards that the Serbs were the true victim.¹²⁷

The SOC also continued using its official newspapers to decry "papal-Protestant ecumenism with its pseudochurch and pseudochristianity", and acted to advance a "militant, theologically-supported anti-ecumenism" from within the WCC itself.¹²⁸ Further to its efforts at the WCC, the SOC also

combined with a political reorientation towards the Global South to produce a policy that was out of step with the rise of an increasingly powerful movement in support of religious and other dissidents in the Soviet Union." Bouwman, *supra* note 115, at 18. Hebly offers a similar conclusion on the WCC's track record during this time: The WCC "has long spoken critically about the western world and about western social and political problems, but throughout the period 1961-85, it was unable to speak in the same way about the socialist world." Hebly, *supra* note 111, at 115.

125. *WCC Moderator Speaks on Ethical Considerations in Light of the War of Aggression Against Ukraine*, WCC (May 22, 2023), <https://www.oikoumene.org/news/wcc-moderator-speaks-on-ethical-considerations-in-light-of-the-war-of-aggression-against-ukraine>.

126. Faced with mounting internal Orthodox pressure following decisions by the Georgian and Bulgarian Orthodox churches to abandon the WCC, the WCC Central Committee approved changes to the institution that did away with the much-maligned principle of majority vote and instead introduced a consensus process amounting to a veto system. Ramet, *supra* note 116, at 158. Some WCC delegates interpreted this move and other changes undertaken well into the 2000s "as a capitulation" to the ROC and other Orthodox Churches in the face of their steady anti-ecumenical agenda. *Id.*, at 159. (For example, in 2001 the ROC "rejected the *Charta Oecumenica*, drawn up on the basis of cooperation of more than 120 Protestant, Anglican, and Orthodox Churches, as well as the Catholic Church, because of its affirmation that all the Christian Churches were 'branches' of a single Church." *Id.*).

127. Anne Herbst, *Stumbling-Blocks to Ecumenism in the Balkans*, 26 RELIGION, STATE & SOC'Y, no.2, 1998, at 177.

128. *Id.* at 177-178. As part of this criticism, in the late 1990s these voices "in particular...those of Serbia and Russia, call[ed] for immediate withdrawal from the [WCC]" and prompted an Orthodox Task Force within the WCC intended to guide the organization's remedial efforts. *Orthodox Task Force*, WCC (Sept. 1998), <https://www.oikoumene.org/resources/documents/orthodox-participation-in-the-wcc>. According to one assessment, in the wake of this initiative which lasted until 2002 and "review[ed] all important Orthodox requirements.... [the WCC achieved] a new perspective in the dialogue" with Orthodox churches. Radivoje Simić, *The Serbian Orthodox Church in the Ecumenical Movement: An Overview*, 40 OCCASIONAL PAPERS ON RELIGION E. EUR., no. 10, 2020, at fn. 20,

“sought support...for the Great Serbian agenda and [used the forum to] pass[] propaganda messages through to the world public opinion.”¹²⁹ During this period, evidence also suggests that the SOC was instrumental in fueling nationalist tendencies. Beyond religious intolerance, the SOC’s nationalism “manifested not only in the Church’s well-known endorsement of the program of Serbian expansionism being promoted on the battlefield during 1991–95, but also in that Church’s broad support for the radical Serbian Democratic Party (SDS)” in BiH.¹³⁰

Even while the Serbian onslaught in Kosovo persisted into the late 1990s, the WCC curiously chose to throw itself behind the Russian and Federal Republic of Yugoslavia (Serbia and Montenegro) position, and to reject the legitimacy of the use of force to compel compliance with outstanding UN Security Council (UNSC) resolutions regarding a negotiated political solution in Kosovo.¹³¹ The UNSC itself voted 12-3 to reject a resolution brought by Russia which described NATO’s use of force against the Federal Republic of Yugoslavia as “constitut[ing] a threat to international peace and security,” and demanding “an immediate cessation of the use of force against the Federal Republic of Yugoslavia.”¹³²

Rather than stake out a more nuanced view of the conflict by recognizing the powerful case for intervention and the negligible likelihood of additional UNSC action, the WCC opted to condemn the NATO-led intervention as a collective failure, claiming that “Not only did it ignore [the UN Charter’s Chapter VII] provisions. . . it used levels of force equivalent to those used in war. Since no declaration of war was issued, it could be argued that NATO powers also placed themselves outside the framework of international humanitarian law applicable in war.”¹³³ Directing an appeal to UN Secretary General Kofi Anan for “an immediate moratorium on the NATO military intervention,” the WCC expressed its “profound concern at the current military intervention,”¹³⁴ thus positioning itself alongside Russia, China and Namibia—and in opposition to a diverse coalition of no fewer than twelve UNSC members who voted to at least tacitly authorize NATO’s defense of

129. Perica, *supra* note 12, at 193.

130. Ramet, *supra* note 116, at 161.

131. See, e.g., S.C. Res. 1199 (Sep. 23, 1998); S.C. Res. 1203 (Oct. 24, 1998). The UNSC issued both resolutions under Chapter VII of the UN Charter.

132. U.N. SCOR, 54th Sess. Mtg. at 6, U.N. Doc. S/PV.3989 (May 26, 1999) (Voting in favor: China, Namibia, Russian Federation. Against: Argentina, Bahrain, Brazil, Canada, France, Gabon, Gambia, Malaysia, Netherlands, Slovenia, United Kingdom of Great Britain and Northern Ireland, United States of America.). U.N. S.C., Belarus, India and Russian Federation: Draft Resolution, U.N. Doc. S/1999/328 (Mar. 26, 1999), <https://undocs.org/en/S/1999/328>. See also Press Release, Security Council, Security Council Rejects Demand for Cessation of Use of Force Against Federal Republic of Yugoslavia, U.N. Press Release SC/6659 (Mar. 26, 1999), <https://press.un.org/en/1999/19990326.sc6659.html>.

133. Central Committee of the World Council of Churches, Minutes of the 50th Mtg. in Geneva, Switzerland at 55 (Aug. 26 – Sep. 3, 1999).

134. Letter from the general secretaries of the WCC, CEC, and LWF and endorsed by the general secretary of WARC, to H.E. Kofi Annan, U.N. General Secretary (Mar. 29, 1999), <https://ia904508.us.archive.org/4/items/wcccciareports022/wcccciareports022.pdf>.

Kosovar civilians. Echoing the WCC view, ROC Patriarch Alexy II traveled to Belgrade's Saint Sava church on April 20, 1999 and addressed a "crowd of 15,000 in the church and nearly 100,000 around it." The Patriarch used the opportunity not to plead for peace, but "to condemn NATO's 'arrogance and injustice' and [to extend] friendly words of support for [Russia's] 'Serbian brothers.'"¹³⁵

More recently, piling onto this ample baggage, the WCC celebrated the SOC's installation of Patriarch Porfirije in 2021 by recalling "with gratitude" the SOC's active participation in the ecumenical movement: "The election of Your Holiness is an encouragement for the entire Orthodox family and beyond. Your work for reconciliation among Christians and your contribution to the pacification of the Balkans over the past years is a source of inspiration and builds now on the legacy of your worthy predecessor, Patriarch Irinej, who promoted a culture of peace among peoples and nations."¹³⁶ This sanguine assessment of the SOC's role—and its new Patriarch—belies not only the history sketched above, but also more recent efforts on the part of the SOC to embrace alarming nationalist and extremist views.

For example, the Church honored at least one convicted Serbian war criminal¹³⁷ and unanimously canonized another, sullied Bishop Nikolaj Velimirović, who during his lifetime had endorsed the Chetnik movement (a guerilla group which sought to establish a Greater Serbian ethnic state and was responsible for civilian massacres during World War Two), praised Hitler, and propagated antisemitism.¹³⁸ The WCC's celebration of SOC peacebuilding and ecumenicism rings even more hollow when held up against recent SOC statements on the war in Ukraine that adopt Kremlin talking points framing Ukrainians as godless falsifiers of history, bent on eradicating Orthodoxy. For example, Patriarch Porfirije has asserted that Russia's justification of its aggression against Ukraine flows from the latter's "forgetting God and [its] renunciation of God."¹³⁹ Elsewhere, borrowing from the Kremlin, the SOC Patriarch accused Ukraine's government of engaging in "horrific state terror" against the ROC-affiliated UOC-MP and more broadly the "Russian world" in a "faithful reprisal of the Soviet persecution

135. Perica, *supra* note 12, at 184.

136. Letter from Rev. Prof. Dr. Ioan Sauca, Acting General Sec'y of the WCC, to His Holiness Porfirije, Patriarch of the Serbian Orthodox Church (Feb. 23, 2021), https://www.oikoumene.org/sites/default/files/2021-02/21_2%20%20His%20Holiness%20Porfirije_Serbian%20Orthodox%20Church.pdf.

137. Vesko Garčević, *The Serbian Orthodox Church and Extreme-Right Groups: A Marriage of Convenience or Organic Partnership?*, BERKLEY F. (Jul. 14, 2023), <https://berkeleycenter.georgetown.edu/posts/the-serbian-orthodox-church-and-extreme-right-groups-a-marriage-of-convenience-or-organic-partnership>.

138. Ramet, *supra* note 116, at 173.

139. Elena Konstantinova, *Serbian Patriarch Speaks of Reasons for Russia's War Against Ukraine*, UNION ORTHODOX JOURNALISTS (Jan. 11, 2024), <https://spzh.media/en/news/77954-serbian-patriarch-speaks-of-reasons-for-russias-war-against-ukraine>.

of the Church.”¹⁴⁰ In Porfirije’s view (indistinguishable from Kirill’s or the Kremlin’s),¹⁴¹ the conduct of Ukraine’s government “testifies that its real—and probably ultimate—goal is to erase the historical memory and all traces of original Orthodoxy in Ukraine in order to change the code and historical identity that the Church has painstakingly built and preserved over the centuries.”¹⁴²

The ROC’s use of its internal leverage to distort the voice of ecumenical and interfaith bodies like the WCC is most acutely evident in the failure to meaningfully condemn Russia’s adventurism in Ukraine. Faced with Russia’s war, the WCC proffered several statements variously calling to “stop this fratricidal war, and to restore peace”¹⁴³ and—making no mention of Russia—appealing “to those responsible for conceiving, pursuing and supporting this war, to stop the bloodshed and destruction.”¹⁴⁴ Months into the war, in June 2022, the WCC managed an acknowledgement that “the Russian Federation launched an illegal invasion of its neighbour, a sovereign state. This tragic development represents a terrible failure of diplomacy, responsibility and accountability to international law.”¹⁴⁵

What the WCC has failed to meaningfully account for, however, is the ROC’s role in continuing to fuel justification of the war in both political and spiritual terms. Instead of suspending or ejecting the ROC from the WCC because of its active endorsement,¹⁴⁶ the organization has insisted that keeping the ROC inside means ensuring dialogue with it: “Many other churches have been working with issues in Ukraine,” yet “they have not been able to reach out to Moscow. But we have been because they are our member

140. Efi Efthimiou, *Even Moscow has not Issued such a Harsh Statement as the Patriarchate of Serbia on the Pechersk Lavra*, ORTHODOX TIMES (Mar. 29, 2023), <https://orthodoxtimes.com/even-moscow-has-not-issued-such-a-harsh-statement-as-the-patriarchate-of-serbia-on-the-pechersk-lavra/>.

141. *Id.*

142. Press Release, Serbian Orthodox Church, *Regarding State Terror Against the Ukrainian Orthodox Church* (Mar. 29, 2023), <https://spc.rs/en/press-release-regarding-state-terror-against-the-ukrainian-orthodox-church/>.

143. Press Release, World Council of Churches, *WCC Urges to Stop This War, and to Restore Peace to the People and Nation of Ukraine* (Feb. 25, 2022), <https://www.oikoumene.org/resources/documents/wcc-urges-to-stop-this-war-and-to-restore-peace-to-the-people-and-nation-of-ukraine>.

144. Press Release, World Council of Churches, *WCC Statement on Evidence of Atrocities in Ukraine* (Apr. 4, 2023), <https://www.oikoumene.org/resources/documents/wcc-statement-on-evidence-of-atrocities-in-ukraine>.

145. Press Release, World Council of Churches Cent. Comm., *WCC Central Committee Statement on the War in Ukraine* (Jun. 18, 2022), <https://www.oikoumene.org/resources/documents/wcc-central-committee-statement-on-the-war-in-ukraine>.

146. Jack Jenkins, *At World Council of Churches Gathering, Russian Church Keeps Its Membership*, RELIGION NEWS SERV. (Sep. 9, 2022), <https://religionnews.com/2022/09/09/world-council-of-churches-assembly-painted-by-debate-over-russian-invasion/> (According to outgoing WCC interim general secretary Ioan Sauca, the organization’s Central Committee unanimously declined to eject the ROC: “The WCC is a free space for dialogue, and we come together not because we agree with one another but because we disagree.”).

church.”¹⁴⁷ However, appealing, this justification increasingly lacks legitimacy, particularly given the WCC’s recent announcement that it would cancel its much-heralded peace roundtable to bring healing to the conflict.¹⁴⁸ According to the WCC, “Unfortunately, despite our best efforts over the intervening months, practical and political obstacles to the participation of the [UOC-MP]¹⁴⁹ and the Orthodox Church of Ukraine (OCU) as core participants in any such dialogue process render our plans impracticable for the time being.”¹⁵⁰

In actuality, the outcome—two years into the war—is unsurprising. Patriarch Kirill’s opposition to the idea of a roundtable was obvious following the WCC’s initial broaching of the plan in May 2023, even when filtered through the WCC’s optimistic spin: “The [ROC] Patriarch—while affirming the potential of the WCC and acknowledging its role as bridge builder—did express concerns about the possibility of a roundtable, and his focus was specifically on the issue of other external influences—and particularly he mentioned the issue of the USA. He said unless we resolve those kinds of issues and influences, it would be difficult to come to a roundtable.”¹⁵¹

As the WCC grapples with its ineffectiveness, the ROC has reveled in its ongoing connection and affiliation with the international body, using the

147. *WCC Leaders Asked about Stand on Ukraine at Press Conference*, WCC (Jun. 22, 2023), <https://www.oikoumene.org/news/wcc-leaders-asked-about-stand-on-ukraine-at-press-conference>.

148. *WCC Concerned over Dormition Kiev Caves Lavra, Plans to Convene Roundtable for Peace*, WCC (Mar. 17, 2023), <https://www.oikoumene.org/resources/documents/wcc-concerned-over-dormition-kiev-caves-lavra-plans-to-convene-roundtable-for-peace>.

149. Since the 2022 invasion, the UOC-MP has sought to distance itself from the ROC. In May 2022, the UOC-MP declared its independence from the ROC due to Patriarch Kirill’s support of the invasion of Ukraine. Prior to this decision, more than 400 parishes had left the ROC in response to the invasion. A month later, the ROC “retaliated” for the UOC-MP’s separatist moves by annexing all three of its dioceses in Crimea to create a Metropolitanate of Crimea under direct ROC control. Engjellushe Morina & Andrew Wilson, *Russia, Ukraine, and the Orthodox Church: Where Religion Meets Geopolitics and War*, ECFR (Jun. 23, 2022), <https://ecfr.eu/article/russia-ukraine-and-the-orthodox-church-where-religion-meets-geopolitics-and-war/>; *Crimean Dioceses Received Directly into Russian Orthodox Church*, ORTHODOX CHRISTIANITY (Jun. 7, 2022), <https://orthochristian.com/146584.html> (Considering “the practical impossibility of regular communication of these dioceses with the Kiev Metropolia,” the ROC accepted the Crimean dioceses “into direct canonical and administrative subordination to the Patriarch of Moscow.”).

150. Press Release, World Council of Churches, *WCC Statement on Postponement of Roundtable Dialogue on Ukraine* (Oct. 11, 2023), <https://www.oikoumene.org/resources/documents/wcc-statement-on-postponement-of-roundtable-dialogue-on-ukraine>. The WCC’s misleading characterization of the ROC’s rejection of dialogue as merely a “postponement” is equally telling.

151. *WCC General Secretary to Patriarch Kirill: “the war in Ukraine must come to an end”*, WCC (May 25, 2023), <https://www.oikoumene.org/news/wcc-general-secretary-to-patriarch-kirill-the-war-in-ukraine-must-come-to-an-end>. Even with the ROC’s clear refusal, the WCC’s general secretary expressed his gratitude for “Patriarch Kirill’s commitment to exploring this possibility.” *WCC General Secretary after the Visit to Moscow “WCC to be an instrument of dialogue”*, WCC (May 17 2023), <https://www.oikoumene.org/news/wcc-general-secretary-after-the-visit-to-moscow-wcc-to-be-an-instrument-of-dialogue>.

forum for its own ends. This manipulation is nothing new; it readily traces back to the Cold War, where the WCC functioned as a receptive venue for the ROC's delivery of the "Kremlin's view of the world."¹⁵² Continued WCC membership lends ROC claims of humanitarian peacebuilding¹⁵³ an undeserved aura of legitimacy and Christian solidarity.¹⁵⁴ The ROC wields this and other instances of international fellowship and engagement to project a business-as-usual relationship with other religious constituencies and to reinforce its message of global support for the Kremlin's actions among audiences in Russia and abroad.¹⁵⁵

For example, Patriarch Kirill used the WCC's 75th anniversary in 2023 to bemoan the "[t]ragic developments in Ukraine." Building on this ersatz compassion, Kirill encouraged the WCC to maintain "bridges of communication built by us and our predecessors over the decades," so that the ROC and WCC "will continue their fruitful cooperation."¹⁵⁶ At the WCC's Central Committee meeting, the ROC reported that its representatives "conveyed a gift from His Holiness the Patriarch—an icon of the Saviour and a congratulatory letter" and then participated in "prolonged conversation on a wide range of issue[s] on the WCC agenda."¹⁵⁷

In response to the ROC playing up its undiminished status within the WCC, WCC officials, including its general secretary, have been left scrambling to provide more context. Following one such incident in May 2023, the WCC general secretary conceded: "I am aware of a video in circulation of the Patriarch actually making a presentation [to our delegation about the war in Ukraine], and that's true, he made a presentation. But, what [the video] doesn't cover is [the WCC] response...to the points made by Patriarch Kirill. Unfortunately, it gives a limited perception, so I would like to say that the WCC had a very detailed response."¹⁵⁸

152. *No Room for Doubt: Religious Freedom*, ECONOMIST 45 (Aug. 20, 2022).

153. *Holy Synod Members Discuss the Issue of Rendering Aid to Refugees and Suffering Civilians in Ukraine*, PATRIARCHIA (Mar. 24, 2022), <http://www.patriarchia.ru/en/db/text/5913060.html>.

154. *World Council of Churches Leaders Meet with Delegation of Moscow Patriarchate*, WCC (Sep. 1, 2022), <http://www.patriarchia.ru/en/db/text/5956383.html>.

155. *His Holiness Patriarch Kirill Sent a Letter to the Acting General Secretary of WCC in Connection with the Events in Ukraine*, PATRIARCHIA (Mar. 11, 2022), <http://www.patriarchia.ru/en/db/text/5907950.html> (claiming the war was a confrontation "between the West and Russia" and asserting that Western "political forces" had conspired to use Ukraine to "make brotherly peoples enemies," and that all Western efforts to integrate Ukraine were founded upon a "geopolitical strategy aimed at weakening Russia." The letter also attacked the legitimacy of sanctions on Russian political and military leaders and alleged "Russophobia is spreading across the Western world at an unprecedented pace.").

156. *Congratulations of His Holiness Patriarch Kirill on the 75th Anniversary of the World Council of Churches*, MOSPAT (Jun. 21, 2023), <https://mospat.ru/en/news/90474/>.

157. *Delegation of the Russian Church Meets with Leaders of the World Council of Churches*, MOSPAT (Jun. 21, 2023), <https://mospat.ru/en/news/90476/>.

158. *WCC General Secretary to Patriarch Kirill*, *supra* note 151.

The WCC's approach is in keeping with its longstanding "emphasis on dialogue and 'silent diplomacy.'"¹⁵⁹ As in past years, however, this disposition—premised on the notion that public denunciations generally harm more than help¹⁶⁰—remains deeply misguided, vulnerable to legitimate criticism and open to the ROC's continued manipulation.

Other international religious organizations and forums where the ROC remains a member in good standing include the Committee of the Representatives of the Orthodox Churches to the European Union (CROCEU),¹⁶¹ the "St. Petersburg International Religious Forum,"¹⁶² "Religions for Peace,"¹⁶³ and the annual "Congress of the Leaders of World and Traditional Religions."¹⁶⁴ These frameworks similarly have taken no

159. Bouwman, *supra* note 115, at 28.

160. *Id.*

161. CROCEU regularly engages with the EU, including through the EU Commission-sponsored dialogue meeting on the Conference on the Future of Europe and annual high-level meeting with religious leaders. See *List of Participants—Article 17 Dialogue Meeting on the Conference on the Future of Europe*, EUR. COMM'N (May 21, 2022), https://commission.europa.eu/document/4f0b85de-9b83-4193-a61a-bd6f67aea520_en; *List of Participants—Annual High-Level Meeting with Religious Leaders*, EUR. COMM'N (Jan. 27, 2023), https://commission.europa.eu/document/624b53c7-3d71-4f96-a704-8e46e00001c8_en. See also *Churches' response to the effects of the war in Ukraine: Prayer for peace and practical solidarity*, ROM. ORTHODOX CHURCH (Jan. 27, 2023), <https://www.romorth.eu/single-post/churches-response-to-the-effects-of-the-war-in-ukraine-prayer-for-peace-and-practical-solidarity> (while the CROCEU representative expressed concern about "the possibility of the misuse of theological language to justify or support military aggression," he made no mention of taking any action against the ROC's status or membership on the committee).

162. *2nd St. Petersburg International Religious Forum takes place in the Northern Capital of Russia*, MOSPAT (Sep. 14, 2023), <https://mospat.ru/en/news/90745/>.

163. H.E. Archimandrite Philaret Bulekov, RFP https://www.rfp.org/leadership_member/h-e-archimandrite-philaret-bulekov/ (last visited Apr. 22, 2024) (A vice-chair of ROC's DECR serves as a co-president for Religions for Peace (RFP)); *Religions for Peace Statement on the Ukraine Conflict*, RFP (Feb. 28, 2022), <https://www.rfp.org/religions-for-peace-statement-on-the-ukraine-conflict/> (The RFP statement tellingly minimizes Russia's attack against Ukraine, euphemistically labeling the war as a generic "Ukraine Conflict," and further omits any reference to Russia's aggression.). *A Russian Orthodox Church Representative Takes Part in Peace Roundtable in Tokyo*, MOSPAT (Sep. 26, 2022), <https://mospat.ru/en/news/89674/> (The ROC continues to participate in RFP "peace roundtables." At one such event in Tokyo, the ROC representative rejected claims that it blessed the war and argued instead that "The major media outlets continue to spread this tale for one simple reason. They would wish to see the [ROC] taking the side of NATO in this conflict and coming out against the government of the Russian Federation, thus becoming a part of political opposition supported by Western countries."). *Statement: Beyond War and Towards Reconciliation—Tokyo Peace Roundtable*, RFP (Sep. 21, 2023), <https://www.rfp.org/resources/beyond-war-and-towards-reconciliation-convening-multi-religious-peace-roundtables-statement/> (RFP's statement issued at the conclusion of the event called for long term reconciliation but made no mention of Russian aggression).

164. See *Declaration of VII Congress of the Leaders of World and Traditional Religions*, UNESCO (Sep. 15, 2022), https://articles.unesco.org/sites/default/files/medias/fichiers/2023/06/DECLARATION%20OF%20VII%20CONGRESS.pdf?TSPD_101_R0=080713870fab200076903480d4897beb15dab608e75bb98224aa18afeb20fa13e18e40f5800742ed08b1d10654143000281f60bedfd67276cfb925c470401d1e31c3d43af31ab9c1c375162ae70a3930cbaa35c6d722356af07a1d86eefac5e; *VII Congress Participants*, RELIGIONS-CONGRESS, <https://religion-s-congress.org/en/news/uchastniki-VII> (last visited Apr. 22, 2024).

steps to eject, suspend, or criticize the ROC and have remained silent or ambivalent as to the ROC's complicity in underwriting Russia's invasion of Ukraine. Like the WCC, these forums furnish the ROC with unchecked global platforms for continuing attacks on the EU's ostensible assault on traditional values,¹⁶⁵ and disseminating Kremlin justifications for the war against Ukraine. For example, at the most recent Congress of the Leaders of World and Traditional Religions in September 2022,¹⁶⁶ DECR Chair Metropolitan Anthony unabashedly pronounced before the world's religious leaders that the war in Ukraine was the justifiable "consequence of indulgence in human vice." Blame for the war thus rightly rested with the "proponent[s] of a secular godless worldview" who promoted a "paradigm of the modern mass culture [that] elevat[ed] human vices and deviations over the value of healthy human society...inspired by the Creator and...preserved for thousands of years."¹⁶⁷ As part of his closing address, the Metropolitan thanked "all the participants for their openness to dialogue and fruitful discussions" and emphasized the need to "intensify cooperation between religious, national, international and social institutions...to overcome differences and stop competition for global hegemony."¹⁶⁸

165. In Ramet's assessment, "The same fear of spiritual pollution which inspires conservative Orthodox concerns about [WCC] participation also underlies the engagement of the [ROC and other] Orthodox hierarchy...in a battle against the [EU's] liberalism. Ramet, *supra* note 116, at 163.

166. *Seventh Congress of the Leaders of World and Traditional Religions held in Astana*, UNESCO (Sep. 15, 2022),

https://www.unesco.org/en/articles/seventh-congress-leaders-world-and-traditional-religions-held-astana?TSPD_101_R0=080713870fab200064da20684a59d168096766b7964fd4a637682643547ed73a5236919cdbae76cf0800077e671430004feecd3e3bd5eaa528d0143e137b3f86fb0d5bd13bf93ad68dcf375aa9d269f69906d23f69798277eabae86c0ec471c1.

167. *DECR Chairman Attended the Opening of the 7th Congress of Leaders of World and Traditional Religions*, PATRIARCHIA (Sep. 14, 2022), <http://www.patriarchia.ru/en/db/text/5959949.html>. Patriarch Kirill's welcome greetings echoed similar themes, ignoring Russia's invasion, and instead focusing on "the pressures of various ideologies" and "the distortion of historical facts and a hitherto unprecedented manipulation of mass consciousness." He further warned that "the path of dictatorship, rivalry and confrontation chosen by a few masters of this world will lead humankind to destruction." *Представители Русской Православной Церкви приняли участие в церемонии открытия XV Ассамблеи Русского мира [Greetings by His Holiness the Patriarch of Moscow and All Russia Kirill to the VII Congress of the Leaders of World and Traditional Religions]*, PATRIARCHIA (Sep. 14, 2022), <http://www.patriarchia.ru/en/db/text/5957077.html>.

168. *Metropolitan Anthony's Address at Closing Session of the 7th Congress of Leaders of World and Traditional Religions*, PATRIARCHIA (Sep. 15, 2022), <http://www.patriarchia.ru/en/db/text/5959570.html>. The ROC continues its involvement with the Congress into 2023, most recently participating in discussions over the draft concept of the next Congress. "In his address, the DECR representative noted the topical and correct idea of the concept to build a strong, happy and prospering society on the basis of moral principles inherent in all world religions." *Representatives of Russian Orthodox Church Attend Sessions of Secretariat of the Congress of Leaders of World and Traditional Religions*, PATRIARCHIA (Oct. 12, 2023), <http://www.patriarchia.ru/en/db/text/6068087.html>.

IV. REGARDING THE DURABILITY OF RUSSIA'S STATE-CHURCH PARTNERSHIP

As the ROC continues its efforts to reinforce Russian policy interests in the Balkans and elsewhere, no significant indicators exist that its usefulness to the Kremlin is waning. In fact, the dynamic underlying this relationship has only been further cemented since 2020. The durability of this relationship is premised, at least in part, on the Kremlin's increasing reliance on traditional values and orthodoxy as key ingredients for its newly constitutionalized civilizational identity. As these values are harnessed to distinguish Russian identity as a civilizational alternative to the West, the Kremlin's need to protect Orthodoxy from perceived threats is likely to increase. Provided the centrality of this aspect of Russian identity remains, there is little to suggest any Kremlin appetite to unravel its relationship with the Moscow Patriarchate and its allies.

Similarly, no evidence suggests that the Moscow Patriarchate has tired of its proximity to the government's actions. Rather, issues and constituencies with which the Kremlin seeks engagement create vital openings for the ROC. In exchange for playing a central role in advancing Russia's narratives of traditional values, sovereignty, human rights relativism, and multipolarity across the globe, Patriarch Kirill continues to enjoy pride of place in Russian society, as well as at high-profile political events, including the 15th Russkiy Mir assembly,¹⁶⁹ the 2nd Russia–Africa Summit,¹⁷⁰ and the most recent World Conference of Compatriots Living Abroad.¹⁷¹ To better understand the durability of this partnership, therefore, this section examines the Kremlin's contemporary position on Orthodoxy, the ROC's validation of the aggression against Ukraine, and the impact of inter-Orthodox tensions on Kremlin and ROC policy.

A. The Kremlin's Approach to Orthodoxy as Foreign Policy and the ROC's Validation of the War Against Ukraine

In the leadup to autocephaly for the OCU, Russia made plain its view that any outside action facilitating this end would represent a blow to Russia's

169. *Представители Русской Православной Церкви приняли участие в церемонии открытия XV Ассамблеи Русского мира* [Representatives of the Russian Orthodox Church Take Part in the Opening Ceremony of the XV Assembly of the Russian World], PATRIARCHIA (Nov. 3, 2023), <http://www.patriarchia.ru/db/text/6074279.html>. The Russkiy Mir Foundation is subject to EU sanctions “for supporting actions which undermine or threaten the territorial integrity, sovereignty and independence of Ukraine.” Council Regulation 2022/1270, 188, 2022, (L 193) 1 (EU).

170. *Address by His Holiness Patriarch Kirill at the 2nd Russia–Africa Summit*, PATRIARCHIA (Jul. 27, 2023), <http://www.patriarchia.ru/en/db/text/6045854.html>.

171. *Address by His Holiness Patriarch Kirill of Moscow and All Rus' to the Participants of the World Conference of Compatriots Living Abroad*, PATRIARCHIA (Nov. 1, 2023), <http://www.patriarchia.ru/en/db/text/6073464.html>.

national interests and constitute a violation of Orthodox canons.¹⁷² Such action would also necessarily indicate Western machinations and prodding. So dire was the prospect of a potential church schism in President Putin's eyes, that the matter necessitated convening his Security Council.¹⁷³ In Putin's words, the mere *possibility* of the Ecumenical Patriarchate granting a Ukrainian church a *tomos* signaled:

direct interference of the state in religious life. This has not happened since the Soviet Union.... They created this breakaway church of the Istanbul curacy.... Now look at how dependent they are becoming on [the Ecumenical Patriarchate].... I think this is [Patriarch] Bartholomew's main impelling motive, to bring [Ukraine] into subjection and make money on it. I believe this is the main underlying motive—except for a tip from Washington, of course. The fact that the [U.S. Secretary of State] called Kiev about this matter and discussed it is an outrage. Absolutely unacceptable.... [This is] meant to further widen the gap between Russian and Ukrainian people. The rationale behind it is, without doubt, political.¹⁷⁴

More ominously, following Ukrainian autocephaly in January 2019, Putin declared: “[T]he Russian authorities consider any interference in church affairs to be absolutely intolerable. We have and will always have respect for the independence of church life, all the more so in a neighbouring sovereign country. Nevertheless, we reserve the right to respond and do our best to protect human rights, including freedom of religion.”¹⁷⁵

This muscular defense of the ROC's spiritual and territorial jurisdiction (as well as the Kremlin's geopolitical interests) played out again in

172. According to Foreign Minister Lavrov: “The plan was to make use of two non-canonical schismatic churches in Ukraine [the UOC-KP and the UAOC], which were never recognised by any Orthodox Church, but which, in the interests of this provocation, Patriarch Bartholomew recognised as canonical, and lifted the anathema from the two hierarchs who head these schismatic churches.” *Excerpts from Foreign Minister Sergey Lavrov's Answers to Questions from RT France, Paris Match and Figaro*, MINISTRY FOREIGN AFFS. RUSS. FED. (Oct. 12, 2018), https://mid.ru/en/foreign_policy/news/1576840/.

173. *Meeting with Permanent Members of the Security Council*, KREMLIN (Oct. 12, 2018), <http://en.kremlin.ru/events/president/news/58813>.

174. *Vladimir Putin's Annual News Conference*, KREMLIN (Dec. 20, 2018), <http://en.kremlin.ru/events/president/news/59455>. The same message came through Russia's MFA: “We understand what is behind the [U.S.] actions: it is an attempt to divide the peoples of Russia and Ukraine spiritually, and even better play them off against each other, now on religious grounds. Anyone trying to resist will be either interrogated and imprisoned by the security service, or come under American sanctions.” *Briefing by Foreign Ministry Spokesperson Maria Zakharova*, MINISTRY FOREIGN AFFS. RUSS. FED. (Dec. 13, 2018 2:48 PM), https://mid.ru/en/foreign_policy/news/1580167/.

175. *Gathering in Honour of the 10th Anniversary of the Russian Orthodox Church Local Council and the Patriarch's Enthronement*, KREMLIN (Jan. 31, 2019), <http://en.kremlin.ru/events/president/news/page/287>. Russia's justifications for the 2022 invasion of Ukraine were partly platformed on claimed violations of freedom of religion.

Montenegro at the end of 2019. Only this time, the SOC's status was at risk, threatened by mounting Montenegrin government support for seeking formal recognition for its own autonomous national church.¹⁷⁶ Serbian president Vučić asked Putin “to protect the Orthodox Church, considering everything that is happening in Montenegro and the entire region,” and warned that the situation risked repeating an outcome similar to what had transpired in Ukraine.¹⁷⁷

In response to this unfolding—though plainly geographically removed—situation, the ROC accused the Montenegrin government of being “active supporters of eurointegration and isolation from Serbia,” and seeking “to discredit the common historical spiritual and cultural heritage of the Serbian and Montenegrin peoples.”¹⁷⁸ Here, Patriarch Kirill also drew a clear warning analogy to the Ukraine scenario, calling out the “external forces” who pursued the weakening of world Orthodoxy.¹⁷⁹

Buttressing the ROC position, Russia's MFA set aside President Putin's previous promise of noninterference and accused the United States of wanting to “bring a schism into the Orthodox world, to destroy the integrity of the spiritual space in the Balkans,” and to divide the Montenegrin population.¹⁸⁰ At the same time, Foreign Minister Lavrov used developments in Montenegro to forcefully reiterate Russia's self-described role as defender of the Serbs and Orthodoxy. He accused the West of fomenting crises in the Balkans by “quite an aggressive promotion of neoliberal values... seek[ing] to impose that on all the rest,” and pledged to work together with Serbia to defend history, culture, and traditions: “acting in one direction with Orthodox Churches, including the [ROC and SOC].... Russia will always defend the interests of Orthodox Churches, come out against attempts at state

176. Previously, SOC priests in Montenegro led efforts to block the country from joining NATO in 2017. COMM. ON FOREIGN RELS., 115th CONG., PUTIN'S ASYMMETRIC ASSAULT ON DEMOCRACY IN RUSSIA AND EUROPE: IMPLICATIONS FOR U.S. NATIONAL SECURITY 54 (Comm. Print 115-21), <https://www.foreign.senate.gov/imo/media/doc/FinalRR.pdf>.

177. Milosevich, *supra* note 8.

178. Archbishop Leonid of Vladikavkaz and Alania, *Montenegro Authorities Prosecute Orthodox Church According to Ukrainian Scenario*, MOSPAT (May 25, 2020), <https://mospat.ru/en/news/45545/>.

179. *Архиепѣи Амфилохій: Врата ада не одолеют Церковь* [Bishop Amfilohiy: *The Gates of Hell Will Not Prevail Against the Church*], WRPC, <https://vrns.ru/news/arkhierey-amfilokhiy-vrata-ada-ne-odoleyut-tserkov/> (last visited May 10, 2024); see also *Statement of Patriarch Kirill of Moscow and All Russia on the Developments in Montenegro*, MOSPAT (Jul. 13, 2020), <https://mospat.ru/en/news/45488/>. Metropolitan Hilarion reiterated the Ukraine connection, but also emphasized that: “The unity of our nations is sealed with the blood of our soldiers who gave their lives for the liberation of the Balkans from the Turkish domination. For us this is a sacred history.” *Metropolitan Hilarion: We Have Supported and Will Support the Canonical Church of Montenegro*, MOSPAT (Aug. 2, 2020), <https://mospat.ru/en/news/45456/>.

180. Christopher Korten, *Religious Proselytism in Statecraft: A Past and Present Comparison of Russia and the United States*, 20 INT'L TRENDS 69, 164 (2022).

interference in their internal affairs, [and] act hand [in] hand with Orthodox Churches and their hierarchs.”¹⁸¹

Expanding on this support, today, Russia squarely situates ROC interests, Orthodoxy, and traditional values more broadly as core postulates of its revised 2023 Foreign Policy Concept (FPC). According to the FPC, “A wide-spread form of interference in the internal affairs of sovereign states has become the imposition of destructive neoliberal ideological attitudes that run counter to traditional spiritual and moral values. As a result, the destructive effect extends to all spheres of international relations.”¹⁸² On this premise, the FPC establishes as a national interest “promot[ing] traditional Russian moral and spiritual values.” To establish a multipolar world, the FPC further declares it a foreign policy priority to consolidate “international efforts to ensure respect for and protection of universal and traditional spiritual and moral values...and [to] counter the attempts to impose pseudo-humanistic or other neo-liberal ideological views, leading to the loss by [] humankind of traditional spiritual and moral values and integrity.”¹⁸³ Finally, to strengthen Russia’s role in the world, the FPC prioritizes “protecting the Russian Orthodox Church from discrimination abroad, including in the interests of ensuring the unity of Orthodoxy.”¹⁸⁴ Thus, the Kremlin has opted to double down on the role of Orthodoxy and ROC interests in defining a central tenet of its foreign policy and civilizational identity, effectively entrenching its reliance on the ROC and its values in order to stake out positions and make inroads across the globe and at home.

As part of situating the ROC and Orthodoxy as a linchpin for civilizational identity and foreign policy, President Putin and others regularly laud the ROC’s “huge, colossal contribution”¹⁸⁵ in undergirding the state’s moral and patriotic foundation, furnishing “spiritual support to our military personnel, and directing its efforts at strengthening the indubitable moral

181. *Head of Russian Ministry of Foreign Affairs Meets with Primate of Serbian Orthodox Church*, MOSPAT (Jun. 18, 2020), <https://mospat.ru/en/news/45514/>. The narratives of Western collusion and control over the Ecumenical Patriarchate continue to reverberate. Most recently, SOC Bishop Sergije of Bihać and Petrovac claimed the West manipulated Patriarch Bartholomew “to stab a knife in the heart of the Russian Orthodoxy—in Holy Kiev.... They have been working on this project for years, even decades. The aim is...to divide the Church of Christ and finally to break down the people on whose power the destiny of the entire humankind depends.” *Bishop Sergije of Bihać and Petrovac: The Kiev Lavra of the Caves Today Is the Golgotha of the Orthodox world*, MOSPAT (Apr. 10, 2023), <https://mospat.ru/en/news/90222/>.

182. *The Concept of the Foreign Policy of the Russian Federation, No. 229*, MINISTRY FOREIGN AFFS. RUSS. FED., art. 8 (Mar. 31, 2023), https://mid.ru/en/foreign_policy/fundamental_documents/1860586/ [hereinafter Foreign Policy Concept].

183. *Id.* at art. 19(9).

184. *Id.* at art. 43(4); *See also Foreign Minister Sergey Lavrov’s Remarks at the Meeting of the United Russia Party General Council Commission on International Cooperation and Support for Compatriots Abroad*, MINISTRY FOREIGN AFFS. RUSS. FED. (Jun 19, 2023), https://mid.ru/en/foreign_policy/news/1889118/.

185. *Greetings to 24th World Russian People’s Council, Orthodox Christianity and the World in the 21st Century*, KREMLIN (Oct. 25, 2022), <http://en.kremlin.ru/events/president/news/69674>.

and patriotic ideals and values in our society, especially among our young people.”¹⁸⁶ In addition to invoking the ROC’s support to legitimate Russian aggression against Ukraine, the MFA continues to develop “Days of Russian Spiritual Culture” outreach initiatives abroad,¹⁸⁷ where various government ministries partner with the ROC. These efforts tie into larger Russkiy Mir outreach and informational objectives, and seek to bring Russia’s narrative to an increasingly loosely defined cohort of Russian “compatriots,” as well as to foreign government and religious representatives, scholars, and cultural figures.¹⁸⁸ Russian officials also boast of the ROC’s role in helping to advance foreign relations, including Russian-African cooperation, by opening “humanitarian centres...to provide children with water, food, medical aid, medicines and clothes.”¹⁸⁹

At the same time, the MFA regularly reports on, and seeks to draw attention to, alleged human rights violations directed against “canonical” Orthodoxy in Ukraine.¹⁹⁰ These reports typically frame developments in Ukraine not merely as a violation of UOC-MP rights, but as action directed against “the entire Orthodox world.”¹⁹¹ This claim to a broader defense of Orthodoxy aligns with the ROC’s narrative in the Balkans that the West is waging war on Orthodoxy. But it also functions to attack Western “hypocrisy” surrounding human rights.¹⁹² For example, in July 2023 Russia’s UN ambassador used his platform at the UN Security Council to decry a procedural decision to exclude a briefing by a UOC-MP priest:

Today is a historic and extremely unfortunate day for the Security Council....Western delegations have...openly demonstrated solidarity with the repressive policy of the Kyiv regime targeting

186. *Greetings to Patriarch Kirill of Moscow and All Russia on Enthronement Anniversary*, KREMLIN (Feb. 1, 2023), <http://en.kremlin.ru/events/president/news/70425>. “Upon consideration of” Patriarch Kirill’s call for an Orthodox Christmas ceasefire, President Putin instructed Russia’s Defense Minister to comply. *President’s Instructions to Russian Federation Armed Forces*, KREMLIN (Jan. 5, 2023), <http://en.kremlin.ru/events/president/news/70330>.

187. *Briefing by Foreign Ministry Spokeswoman Maria Zakharova*, MINISTRY FOREIGN AFFS. RUSS. FED. (Jun. 21, 2023), https://mid.ru/en/foreign_policy/news/1890329/.

188. *Ethiopia Hosts the Days of Russia’s Spiritual Culture*, RUSSKIY MIR (Jun. 27, 2023), <https://russkiymir.ru/en/news/314929/>.

189. *News Conference with Maria Lvova-Belova at Russia’s Foreign Ministry*, KREMLIN (Oct. 16, 2023 6:00 PM), <http://en.kremlin.ru/events/administration/72608>.

190. *See generally “Illegal actions by the Kiev regime targeting the Ukrainian Orthodox Church (UOC), its clergy and parishioners,”* MINISTRY FOREIGN AFFS. RUSS. FED. (Jul. 25, 2023), https://mid.ru/en/foreign_policy/humanitarian_cooperation/1898457/#7.

191. *Comment by Foreign Ministry Spokeswoman Maria Zakharova on the Intended Looting of the Kiev-Pechersk Lavra*, MINISTRY FOREIGN AFFS. RUSS. FED. (Jun. 26, 2023 8:30 PM), https://mid.ru/en/foreign_policy/news/1893927/.

192. *Address of the DECR chairman Metropolitan Anthony of Volokolamsk at the meeting of the UN Security Council*, PATRIARCHIA (Jan. 18, 2023 11:25 AM), <http://www.patriarchia.ru/en/db/text/5997057.html> (The Metropolitan’s speech to the UNSC expressed grave concern over “flagrant violation of human and constitutional rights of Orthodox Christians in Ukraine” without any mention of Russia’s invasion of Ukraine.).

canonical Orthodoxy, which is a blatant example of egregious double standards undermining freedom of expression, freedom of opinion, freedom of faith and all the ideals that they proclaim to uphold....[Blocking the participation of a UOC-MP priest demonstrates how the West] really views all those lofty ideals and how easily it is ready to abandon them to advance petty parochial attempts to spite the Russian Federation.¹⁹³

Pivoting to the ROC's advocacy efforts on behalf of the Kremlin, the Church continues to play a leading part in legitimating Russia's invasion of Ukraine, both for domestic and foreign audiences. The ROC remains ideologically vested in the war's justifications and objectives. Patriarch Kirill has repeatedly expressed support for the war and attached to it both religious fervor and purpose, painting it as a fight against a godless enemy committed to the destruction of Orthodox unity and Christian values. Most recently, Kirill asserted that Russia's war against Ukraine was a consequence of the ongoing civilizational conflict brought on by the West's disregard for Christianity and Russian influence. In his accounting, this Western aggression was rooted in the conflict over the Balkans thirty years ago:

In the circumstances with which this [most recent] conflict began, we see an undoubted religious dimension: an irrational hatred of the peoples professing Orthodoxy. It was this hatred that caused the aggression against Yugoslavia in the 1990s. It is this hatred that causes the unceremonious interference of Western states in the lives of countries whose peoples are carriers of Orthodoxy. This intervention was expressed and is expressed in economic and political blackmail, in the organization of so-called color revolutions.¹⁹⁴

Alongside its steadfast ideological support for the war and the Kremlin's narrative of the West undermining state sovereignty, the ROC is also instrumental in the provision and relaying of social services and humanitarian efforts building out ties to Crimea and other areas of occupied Ukraine.¹⁹⁵ This has included the illegal "evacuation"¹⁹⁶ of orphans and others from

193. U.N. SCOR, 78th Sess., 9385th mtg. at 3, U.N. Doc. S/PV.9385 (Jul. 26, 2023).

194. *Доклад Святейшего Патриарха Кирилла на Архиерейском Совете 19 июля 2023 года* [Report of His Holiness Patriarch Kirill at the Bishops' Conference on July 19, 2023], MOSPAT (Jul. 19, 2023), <https://mospat.ru/ru/news/90538/> [hereinafter *Report of Patriarch Kirill on July 19, 2023*].

195. *35 Shifts of Orthodox Repair Volunteers Have Visited Mariupol since March. Information Report on Assistance to Refugees*, PATRIARCHIA (Oct. 31, 2023), <http://www.patriarchia.ru/db/text/6073785.html>.

196. On March 17, 2023, the International Criminal Court (ICC) announced arrest warrants for President Putin and Ms. Maria Lvova-Belova, Russia's Presidential Commissioner for Children's Rights. Both are charged under the ICC's Rome Statute (articles 8(2)(a)(vii) and 8(2)(b)(viii)) with the war crime of unlawful deportation of children and the unlawful transfer of children from occupied areas of Ukraine to the Russian Federation. *Situation in Ukraine:*

Donetsk, Luhansk, and other regions to locations within Russia.¹⁹⁷ In doing so, the ROC has supplemented the work of the state organs responsible for managing the influx of refugees.¹⁹⁸ A cooperation agreement between the Ministry of Emergency Situations (MES) and the ROC, signed in July 2017, “provides the church with information and free access to all camps allowing the ROC to deliver aid and spiritual support to the refugees.”¹⁹⁹ ROC assistance in the conflict zone is provided not only by dioceses, churches and monasteries, but also by myriad affiliated Orthodox organizations.²⁰⁰ Assessing this partnership, Patriarch Bartholomew asserted in March 2023: “The Church and the State leadership in Russia cooperated in the crime of aggression, and share the responsibility for the resulting crimes, like the shocking abduction of Ukrainian children.”²⁰¹

B. Inter-Orthodox Dynamics After Ukrainian Autocephaly and During the Ongoing War

Patriarch Bartholomew’s above statement underscores the difficult depths to which current inter-Orthodox relations have plummeted. For Patriarch Kirill’s part, the feeling is mutual. While Kirill might struggle to label his counterpart an accomplice to a war crime, his narrative communicates an equally dire message for Orthodox unity. For Kirill and the ROC’s allies, the Ecumenical Patriarch has been coopted by Western political handlers: “one of the tools of the [Western] struggle against Orthodoxy was the Patriarchate of Constantinople. Its leading hierarchies for a long time, with the support of external political forces...prepared to dissolve the unity of Orthodoxy, conducted secret negotiations and weaved intrigues.”²⁰² Thus, the “grave schism” in Ukraine was not the product of the honest or transparent yearning of a nation. Rather, in Kirill’s view, it was the outcome of:

ICC Judges Issue Arrest Warrants Against Vladimir Vladimirovich Putin and Maria Alekseyevna Lvova-Belova, INT’L. CRIM. CT. (Mar. 17, 2023), <https://www.icc-cpi.int/news/situation-ukraine-icc-judges-issue-arrest-warrants-against-vladimir-vladimirovich-putin-and-maria-alekseyevna-lvova-belova>.

197. *При участии Церкви передана помощь сиротам из детских домов Донбасса [With the Participation of the Church, Assistance Was Provided to Orphans from Orphanages in Donbass]*, PATRIARCHIA (Mar. 28, 2022), <http://www.patriarchia.ru/db/text/5912842.html>.

198. Alicja Curanović, *The Russian Orthodox Church, Human Security, Migration and Refugees: Concepts, Strategies and Actions*, in FORCED MIGRATION AND HUMAN SECURITY IN THE EASTERN ORTHODOX WORLD 82 (Lucian N. Leustean ed., 2020).

199. *Id.* at 83.

200. *Украинская Православная Церковь помогает эвакуировать людей из Мариуполя. Информационная сводка о помощи беженцам [The Ukrainian Orthodox Church Is Helping to Evacuate People from Mariupol Refugee Assistance Brief]*, PATRIARCHIA (Mar. 17, 2022), <http://www.patriarchia.ru/db/text/5909320.html>.

201. *Address by His All-Holiness Ecumenical Patriarch Bartholomew at the Seminar “Reaction of Churches and Religious Communities to War and Conflict,”* ECUMENICAL PATRIARCHATE (Mar. 22, 2023), <https://ec-patr.org/address-by-his-all-holiness-ecumenical-patriarch-bartholomew-at-the-seminar-reaction-of-churches-and-religious-communities-to-war-and-conflict-lit/>.

202. *Report of Patriarch Kirill on July 19, 2023*, *supra* note 194.

influential world political forces, hostile not only to Russia and Orthodoxy, but also...to the Christian worldview as a whole[. These forces pursue a larger objective of breaking the] spiritual ties between the East Slavic Orthodox world and the Orthodox community of the Mediterranean and the Middle East [and preventing] the preservation of the Christian foundations of the cradle of modern civilization—Europe. In other words, everything is done to destroy Orthodoxy, and ultimately to destroy the entire Christian heritage in principle.²⁰³

Like other issues, the ROC regularly relies on reinforcement from its allied churches to project its messaging on Ukrainian autocephaly. For example, the SOC's forceful rhetoric aligns neatly with the ROC and the Kremlin. Accordingly, the activities of the Ukrainian government directed at the "canonical" UOC-MP are disparaged as "pro-European" and "democratically-orientated." SOC Bishop Irinej of Bac even echoes the theme of Western hypocrisy channeled by Russia's UN ambassador: 'It goes without saying that virtuous representatives of democracy and human, including religious, rights and freedoms on the [sic] both sides of the Atlantic wisely keep silent [in the face of alleged Ukrainian violations of UOC-MP rights]. In their opinion, in Kiev their 'values' and 'ideals' are [being] defended."²⁰⁴ Similarly, when a delegation of ROC priests arrived in Srpska in September 2023, they were welcomed by SOC Bishop Fotije, who underscored the importance of strengthening the ROC and SOC's fraternal ties, "such ties being very relevant these days when the Orthodox Christian unity is being tested by hardships."²⁰⁵ In Bulgaria, BOC Metropolitan Daniel of Vidin attacked Ukraine for its alleged persecution of the UOC-MP, echoing numerous ROC and Kremlin justifications for war, including the illegitimacy of the Ukrainian nation.²⁰⁶

Allied Orthodox churches also transmit this ROC messaging directly to political officials of various states. In December 2015, for example, BOC Patriarch Neophyte, in a letter to then Ukrainian President Petro Poroshenko, protested perceived persecution of the UOC-MP, which one observer suggested signaled "an unprecedented gesture that defied diplomatic protocol."²⁰⁷

203. *Id.*

204. *Bishop Irinej of Bac: Most Local Orthodox Churches Continue to Recognize Canonical Metropolitan Onufry of Kiev and All Ukraine while Ignoring Citizen Sergey Dumenko*, MOSPAT (Jan. 17, 2023), <https://mospat.ru/en/news/89953/>.

205. *Delegation of the Russian Orthodox Church Visits the Fold of the Serbian Orthodox Church*, PATRIARCHIA (Sep. 14, 2023), <http://www.patriarchia.ru/en/db/text/6059826.html>.

206. *Metropolitan Daniel of Vidin: The Faithful of the Ukrainian Orthodox Church Are Enduring Violence Owing to Their Faith*, PATRIARCHIA (Jun. 7, 2023), <http://www.patriarchia.ru/en/db/text/6035048.html>.

207. Lucian N. Leustean, *Orthodox Conservatism and the Refugee Crisis in Bulgaria and Moldova*, 54 COMMUNIST & POST-COMMUNIST STUD. 83, 88 (2021).

In response to the ROC's contestation of Ukrainian autocephaly and its spillover effects, the Ecumenical Patriarchate has asserted it must focus "on ways to resist and neutralize the capacity of the leadership of the Moscow Patriarchate to undermine unity and to theologically legitimize criminal behavior," while working to "bring back our Russian brothers and sisters to our community of shared values."²⁰⁸ Yet Kirill's resentment over the schism continues to sear,²⁰⁹ particularly as some other Orthodox churches have recognized the autocephalous OCU: "The split...made it extremely difficult for the spiritual communication of the Russian Church with a significant part of the Greek Orthodox world. This, of course, significantly weakened the voice of Orthodox testimony in the modern world."²¹⁰ And while Kirill has suggested that the ROC retains powerful allies within Greek Orthodoxy, his framing of the crisis draws back to Ukraine, to the tension between Russia and the West, and to the narrative of Russia—and Orthodoxy—under constant threat:

we are talking about a war against Orthodoxy, because all this cannot but weaken Universal Orthodoxy. [The Ecumenical Patriarchate is] a tool in the hands of skillful manipulators, and it has been such a tool for many years.... We see how this year the same model as in Estonia is being built in Lithuania. The secular authorities of Latvia...decided to go even further and themselves proclaimed the false autocephaly of the Latvian Church.... [T]he so-called Greek Catholics—Uniates—take an active part in inciting and maintaining the persecution of the Orthodox people of Ukraine.²¹¹

Returning to the Balkans, the granting of autocephaly to the Macedonian Orthodox Church-Ohrid Archdiocese (MOC) in May 2022 signaled a strengthening of the SOC's position in the region.²¹² In resolving a

208. Andrius Sytas, *Ecumenical Patriarch: Russian Church Shares Blame for 'crimes' in Ukraine*, REUTERS (Mar. 22, 2023), <https://www.reuters.com/world/europe/ecumenical-patriarch-russian-church-shares-blame-crimes-ukraine-2023-03-22/>.

209. *Ecumenical Patriarch: There Is No Schism in Orthodoxy—I Have No Right to Take a Step Back*, ORTHODOX TIMES (Jan. 3, 2021), <https://orthodoxtimes.com/ecumenical-patriarch-there-is-no-schism-in-orthodoxy-i-have-no-right-to-take-a-step-back/> (from the Ecumenical Patriarchate's perspective, "There is NO schism in Orthodoxy...I have no right to take a step back.").

210. *Report of Patriarch Kirill on July 19, 2023*, *supra* note 194.

211. *Id.* The Ecumenical Patriarchate's exarchate in Lithuania, established in March 2023, is intended to address the unease felt by the country's Orthodox Christians in the face of the ROC's support for the invasion of Ukraine. See *Ecumenical Patriarch Establishes Exarchate of Ecumenical Patriarchate in Lithuania*, ORTHODOX TIMES (Mar. 22, 2023), <https://orthodoxtimes.com/bartholomew-the-ecumenical-patriarchate-offers-itself-to-the-service-of-the-orthodox-faithful-in-lithuania/>.

212. *Read the Full Text of the Tomos of Autocephaly of the Macedonian Orthodox Church*, ORTHODOX CHRISTIANITY (Jun. 6, 2022), <https://orthochristian.com/146559.html>. As a result of the *tomos* granted by the SOC, the Ecumenical Patriarchate formally resumed communion with the MOC.

longstanding dispute between the two churches,²¹³ the move is also likely to secure an additional “autonomous” voice in the ROC’s camp. The ROC welcomed news of the MOC’s autocephaly, expressing its hope the Church would “remain faithful to the Orthodox canonical tradition.”²¹⁴ Since then, Patriarch Kirill has assured MOC Archbishop Stefan of the ROC’s “invariable comprehensive support,” playing up familiar narratives of traditional love held by the ROC faithful “for their Orthodox brothers in North Macedonia”²¹⁵ and commemorating “all the Russian soldiers killed from the beginning of time.”²¹⁶ At the same time, the MOC continues to celebrate the UOC-MP and recognize it as the only canonical Orthodox church in Ukraine.²¹⁷ In addition, it has rejected the OCU’s offer to enter into communion with the MOC “until the full resolution of its status in the fullness of Orthodoxy.”²¹⁸

Even as the ROC cements alliances with sympathetic churches, it has sought to widen the rift among Orthodox faithful by retaliating against any churches that extend recognition to the OCU. For example, in response to the Orthodox Church of Alexandria’s (OCA) decision to commemorate the OCU, the ROC announced the rupture of Eucharistic communion with Patriarch Theodore and the OCA. Subsequently, the ROC established a new Patriarchal Exarchate for Africa²¹⁹ and appointed Metropolitan Leonid of Klin as its

213. The MOC unilaterally announced its autocephaly from the SOC in 1967. The SOC denounced the declaration as schismatic and the MOC failed to gain recognition from other Orthodox churches. See Engjellushe Morina & Andrew Wilson, *Russia, Ukraine, and the Orthodox church: Where Religion Meets Geopolitics and War*, ECFR (Jun. 23, 2022), <https://ecfr.eu/article/russia-ukraine-and-the-orthodox-church-where-religion-meets-geopolitics-and-war/>.

214. *Russian Church Recognizes Macedonian Orthodox Church—Archdiocese of Ohrid as Autocephalous Sister Church*, PATRIARCHIA (Aug. 25, 2022), <http://www.patriarchia.ru/en/db/text/5956351.html>. The ROC initially criticized efforts by the Ecumenical Patriarchate to recognize the MOC. *Patriarchate of Moscow: The Recognition by the Serbian Orthodox Church of the Autocephaly of the Church in North Macedonia Is a Joyful Event*, ORTHODOX TIMES (May 25, 2022), <https://orthodoxtimes.com/patriarchate-of-moscow-the-recognition-by-the-serbian-orthodox-church-of-the-autocephaly-of-the-church-in-north-macedonia-is-a-joyful-event/>.

215. *Patriarch Kirill’s Telephone Conversation with Archbishop Stefan of Ohrid and Macedonia*, PATRIARCHIA (Jan. 13, 2023), <http://www.patriarchia.ru/en/db/text/5997416.html>.

216. *Moscow Patriarchate Cleric Served the Commemoration Prayer in an Old Monastery of the Macedonian Orthodox Church—Archbishopric of Ohrid*, PATRIARCHIA (May 8, 2023), <http://www.patriarchia.ru/en/db/text/6026129.html>.

217. *Primate of Macedonian Orthodox Church Added to Diptychs of Ukrainian Orthodox Church*, ORTHODOX CHRISTIANITY (Nov. 23, 2022), <https://orthochristian.com/149608.html>; see generally *The Primate of the Macedonian Church Congratulated His Beatitude Metropolitan Onufry on the Ninth Anniversary of His Enthronement*, RASKOLAM (Aug. 18, 2023), <https://raskolam.net/en/70129-predstoyatel-makedonskoyi-czerkvy-pryvitav-blazhen-nishogo-mytopolyta-onufriya-z-devyatoyu-richnyczeyu-intronizacziyi/>.

218. *Macedonian Church Rejects Communion with Ukrainian Schismatics*, ORTHODOX CHRISTIANITY (Mar. 31, 2023), <https://orthochristian.com/152856.html>.

219. The African continent traditionally has fallen under the jurisdiction of the Patriarchate of Alexandria.

head.²²⁰ In the ROC's view, this move was intended to offer "canonical protection to those Orthodox clergy in Africa who do not wish to participate in the lawless legitimization of the schism in Ukraine."²²¹ This resulted in the OCA banning priests who shifted allegiance to the Exarchate, its defrocking of Leonid of Klin, and the decision to break off communion with the ROC.²²² Predictably, the ROC's exarchate has already sought to make political connections and inroads in Africa on behalf of Russia.²²³ For example, during a meeting between Metropolitan Leonid of Klin and Egypt's ambassador to Russia, the ambassador hailed the establishment of the ROC's African Exarchate as "open[ing] new prospects for cooperation with Egypt" and

220. *The Creation of a Patriarchal Exarchate in Africa. An Interview with the Metropolitan of Klin Leonid*, PATRIARCHIA (Dec. 31, 2021 3:21 PM), <http://www.patriarchia.ru/en/db/text/5878360.html>. The Exarchate boasted that within a year it had established an active presence in 18 African states. *Metropolitan Leonid of Klin: The Patriarchal Exarchate of Africa Is Currently Present in 18 African Countries*, PATRIARCHAL EXARCH AFRICA (Dec. 20, 2022), <https://exarchate-africa.ru/en/press-about-us/metropolitan-leonid-of-klin-the-patriarchal-exarchate-of-africa-is-currently-present-in-18-african-countries/>. By July 2023, the Exarchate claimed to have opened over 200 parishes in 25 African countries. *See Patriarch Kirill Visits African Exarchate Stand at Russia–Africa Summit*, PATRIARCHAL EXARCHATE OF AFR. (Jul. 28, 2023), <https://exarchate-africa.ru/en/news/patriarch-kirill-visits-african-exarchat-e-stand-at-russia-africa-summit/>.

221. *Synod: Decisions of the Patriarchate of Alexandria on the Hierarchs and Clerics of the Russian Orthodox Church Are Invalid*, PATRIARCHIA (Dec. 29, 2022), <http://www.patriarchia.ru/en/db/text/5992036.html>.

222. *Id.*

223. In July 2023, the ROC Exarchate of Africa signed a cooperation agreement with the East African Continental Council (EACC), a Russian NGO established in 2022 to develop religious, cultural, and business relations between the Russian Federation and African countries. *See Patriarch Kirill Visits African Exarchate Stand at Russia–Africa Summit*, PATRIARCHAL EXARCHATE OF AFR. (Jul. 28, 2023), <https://exarchate-africa.ru/en/news/patriarch-kirill-visits-african-exarchate-stand-at-russia-africa-summit/>. In May 2022, the EACC facilitated an agreement between the ROC and the longtime President of Uganda, Yoweri Museveni, that furnished the church with a plot of land in Kampala "with the view of building there a religious and educational centre. The complex will include an Orthodox church, a building of the Russian Centre for Science and Culture [Rossotrudnichestvo], a hospital, a college, an apartment hotel and an office centre. The [EACC] provides full support in designing and developing the complex." *See Partners*, SECOND SUMMIT: RUSS.–AFR. ECON. & HUMANITARIAN F., <https://summitafrica.ru/en/partners/partners/partners-all/>. The EACC is headed by Ivan Shkarban and Timofey Lyolikov. Both have ties to other Russian initiatives in Africa. Shkarban, through his M/S Joint Stock Company Global Security, is providing Uganda with a controversial digital license plate program. Reports in 2021 alleged that President Museveni sought to push through the deal with Shkarban, despite concerns about the project's funding and technology. *See Russian Vehicle Tracking Deal*, INDEP. (UGANDA) (Aug. 2, 2021), <https://www.independent.co.ug/russian-vehicle-tracking-deal/>. Lyolikov is affiliated with Bureau Legint, a Russian consulting organization that works in close cooperation with the Russian government to implement President Putin's plan "to expand influence on the African continent and strengthen Russian positions there." As a member of Russia's Council on Foreign and Defense Policy, Bureau Legint engages with government, military, and ROC officials to advance Russian foreign policy and business activity. *See News*, BUREAU LEGINT, <https://en.legint.com/press-release/> (last visited May 25, 2024).

helping to “develop the traditional fraternal relations between the peoples of Russia and Egypt.”²²⁴

V. EXTRACTING BROADER LESSONS FROM THE ROC’S BALKAN OPERATIONS

While the previous sections have focused primarily on ROC activities in the Balkan region, the Church’s communication and outreach efforts are in no way limited to this relatively small geographic area, or to Orthodox co-religionists alone. As already evidenced above, the ROC’s operations are truly global in nature, spanning virtually all regions of the globe, including from the “near abroad” to Africa,²²⁵ the Americas, and Asia.²²⁶ As assessed below, with slightly modified messaging, these operations similarly seek to generate support for the Kremlin’s political platform from other religious groups and political actors. Following a brief analysis of ROC messaging in this global context, the section explores how to measure Kremlin support for the ROC’s activities.

A. ROC Messaging Beyond the Balkans

The Kremlin’s newly constitutionalized civilizational identity is premised in part on a uniquely Russian sense of Orthodoxy. This specific identity garners traction in the Balkan region precisely because of its intimate and immediate connections to European historical experience and notions of pan-Slavism and pan-Orthodoxy. By deploying a slightly modulated “traditional values” message when operating globally, the Kremlin and ROC can preserve the essential messages relayed to Orthodox constituencies in the Balkans—portraying the West as anti-religious, “ultraliberal”, debauched, hypocritical, and corrosive of state sovereignty—while appealing to a larger audience. This more generic “traditional values” formulation essentially facilitates building out a more diverse international coalition of potential alliances in favor of Russia’s position as the ostensible guardian of

224. Patriarchal Exarch for Africa Meets with Egypt’s Extraordinary and Plenipotentiary Ambassador to Russia, PATRIARCHIA (Feb. 1, 2022), <http://www.patriarchia.ru/en/db/text/5893336.html>.

225. See, e.g., DECR Representative Attends Opening of the Spiritual Culture of Russia and Ethiopia Celebration and Meets with the Leadership of the Ethiopian Church, MOSPAT (Jul. 14, 2023), <https://mospat.ru/en/news/90522/>; Patriarchal Exarch of Africa Meets with Ambassador of South Sudan to Russia, MOSPAT (Oct. 10, 2023), <https://mospat.ru/en/news/90871/>.

226. See, e.g., His Holiness Patriarch Kirill Met with the Philippine Ambassador to Russia, MOSPAT (Mar. 21, 2023), <https://mospat.ru/en/news/90079/>; Metropolitan Anthony of Volokolamsk Attended the Reception Given on the Occasion of the State Visit to Russia Made by PRC President Xi Jinping, MOSPAT (Mar. 22, 2023), <https://mospat.ru/en/news/90150/>; DECR Representative Takes Part in Grand Meeting Devoted to Anniversary of Russia-China Treaty of Good-Neighbourliness, MOSPAT (Jul. 1, 2023), <https://mospat.ru/en/news/90498/>; Address by Metropolitan Anthony of Volokolamsk at the General Assembly of the Christian Conference of Asia, MOSPAT (Sep. 30, 2023), <https://mospat.ru/en/news/90831/>.

Christianity, religious conservative values, and/or state sovereignty depending on the target audience. For the Kremlin, the significance of tapping into this broader cohort of states and other actors sympathetic to a conservative, anti-Western message also suggests that the ROC will remain instrumental as an organ for outreach, coalition building, and for validating Kremlin policy and its framing of multipolarity within the international arena generally.

ROC advocacy of conservative traditional values is calculated to garner support beyond the immediate orbit of sympathetic Orthodox constituencies. This is the case even in the Balkan region, where the ROC has steadily attempted to make inroads with influential Catholic churches. For example, during a 2017 meeting with the President of Croatia, Patriarch Kirill celebrated the “dynamic” relations with the Catholic Church: “We take a common stand on...concern about persecution of Christians....We have the same attitude to the so-called alternative marriages, on euthanasia, abortions or anything that we deem dangerous to the integrity of the human person.”²²⁷ Similarly, in 2019, Metropolitan Hilarion (former DECR chair) met with the Chairman of the Slovenia-Russia Friendship Association (the first ambassador of Slovenia to the Russian Federation) to discuss the “development of interaction between the Moscow Patriarchate and Slovenia in the religious and cultural spheres and prospects for inter-Christian relations with the Catholic Church of Slovenia.”²²⁸

Ukraine is also instructive here. The government effort there to pass a same-sex civil partnership bill provoked not only UOC-MP opposition, but also opposition from the newly autocephalous OCU, “the Ukrainian Greek Catholic Church, several Protestant denominations, and Jewish and Muslim groups.”²²⁹ In a similar vein, Macedonia’s Orthodox Church has spearheaded protests opposing adoption of the Gender Equality Law and the Law on Birth Registry, which it claims will open a “Pandora’s box from which different genders could emerge every day.”²³⁰ On this issue, the MOC “insists that it is receiving support for its protest from other religious communities in the country and from public figures,”²³¹ including “North Macedonia’s leading Islamic officials, the Catholic Church and other religious communities.”²³²

227. *Primate of the Russian Orthodox Church Meets with the President of Croatia*, MOSPAT (Oct. 19, 2017), <https://mospat.ru/en/news/48105/>.

228. *Metropolitan Hilarion Meets with Chairman of Slovenia-Russia Friendship Association*, PATRIARCHIA (Mar. 13, 2019), <http://www.patriarchia.ru/en/db/text/5395986.html>.

229. Cole S. Aronson, *Ukraine’s Most Powerful Spiritual Force Faces a Choice*, POLITICO (Sep. 1, 2023), <https://www.politico.com/news/magazine/2023/09/01/letter-from-ukraine-orthodox-church-00113373>.

230. Sinisa Jakov Marusic, *North Macedonia’s Church Protests Gender-Related Laws*, BALKAN INSIGHT (Jun. 29, 2023), <https://balkaninsight.com/2023/06/29/north-macedonias-church-protests-gender-related-laws/>.

231. *Id.*

232. Konstantin Testorides, *Thousands in North Macedonia Join Church Protest Against Proposed Laws on Gender Equality, Identity*, ASSOCIATED PRESS (Jun. 29, 2023),

In a similar vein, the ROC has used appeals to traditional values in its direct relations with the Vatican to complement these types of localized efforts. As part of the historic 2016 Havana Declaration, the ROC successfully tamped down potential Vatican opposition to Kremlin misadventures while also portraying Russia as the defender of Christianity and a neutral peacemaker during Ukraine's pre-2022 conflict.²³³ The ROC's effort to win over the Vatican as an international ally during this period is rendered especially transparent when situated alongside parallel Kremlin efforts to secure the same Papal buy-in for Russia's Syria project and its narrative of Russia "as a bulwark of morality and traditional values."²³⁴

Even as the ROC's support for Russia's war on Ukraine has grown more strident, its alliance-building efforts under the construct of traditional values and hostility to the West remain undiminished across the globe, including the Muslim world.²³⁵ For example, the Russia-Islamic World Strategic Vision Group—a program endorsed by President Putin—brings together 36 Russian and 34 foreign members, "including former senior-level leaders, scientists, representatives of business circles, and Orthodox and Muslim religious figures" to develop "soft power tools" to enhance Russian relations with the Islamic world.²³⁶ At the group's most recent meeting in May 2023, Patriarch Kirill asserted: "[W]e cannot but see that Western interference in the affairs of other countries, in particular, the Middle East has had sorrowful consequences.... The Western forces were trying to use a religious factor to destroy those countries' statehood, to sow enmity and provoke divisions on religious grounds in society."²³⁷

<https://apnews.com/article/north-macedonia-protest-gender-equality-identity-bills-2535d49c55ee1a107964acb521ab71ca>.

233. *Joint Declaration of Pope Francis and Patriarch Kirill of Moscow and All Russia*, HOLY SEE (Feb. 12, 2016), at ¶ 26, http://www.vatican.va/content/francesco/en/speeches/2016/february/documents/papa-francesco_20160212_dichiarazione-comune-kirill.html; see also *Did the Pope Just Kiss Putin's Ring?*, ECONOMIST (Feb. 15, 2016), <https://www.economist.com/europe/2016/02/15/did-the-pope-just-kiss-putins-ring>.

234. Jacopo Barigazzi, *Why the Pope ♥ Putin*, POLITICO (Aug. 11, 2017), <https://www.politico.eu/article/pope-francis-loves-vladimir-putin-russia-religion/>.

235. See, e.g., *His Holiness Patriarch Kirill Meets with a Delegation of Religious Figures and Scholars from Iran*, MOSPAT (Feb. 22, 2023), <https://mospat.ru/en/news/90083/> (where Mohammad Mahdi Imanipour, chairman of the Organization for Islamic Culture and Communication in Iran, observed "It seems to me that the difficulties we encounter today are caused by the inaction resorted to by the collective West with regard to the place and role of Iran and Russia played on the global level. I believe, Iran and Russia are on the same line today."); See also *His Holiness Patriarch Kirill Meets with Ambassador of the Kingdom of Bahrain to Russia*, MOSPAT (Mar. 9, 2023), <https://mospat.ru/en/news/90102/> (Where Patriarch Kirill expressed "the fostering of relations with the Muslim community to be an important part of" the ROC's work.).

236. *His Holiness Patriarch Kirill Attends a Meeting of the Russia-Islamic World Strategic Vision Group*, MOSPAT (May 19, 2023), <https://mospat.ru/en/news/90359/>.

237. *Address by Patriarch KIRILL of Moscow and All Russia at the Meeting of Russia-Islam Strategic Vision Group*, MOSPAT (May 18, 2023), <https://mospat.ru/en/news/90360/>.

As a remedy to this Western-dominated vision, Kirill unsurprisingly leaned into traditional values, the antidote prescribed by the Kremlin and the ROC:

For decades, the Moscow Patriarchate has been maintaining brotherly relations with Islamic leaders and organisations. In recent years, these contacts have intensified considerably.... Why does the Russian Orthodox Church maintain such close relations with the Muslim Ummah in and outside Russia? *Because our fundamental values are alike... Orthodox Christians and Muslims resolutely reject any attempts to make sin a social norm.* For us the unnatural confusion of the sexes and the so-called LGBT ideology are absolutely unacceptable. We seek to preserve [a] traditional, God-commanded form of family.... [W]e can work together in opposing the [West's] sophisticated propaganda of individualism and the worship of the human being.²³⁸

To prevent “the godless secular world” from securing “the victory of evil and the development of a universal cult of sin and egoism,” Kirill urged his audience to consolidate the forces committed to traditional values: “our joint efforts can save the world from self-destruction.”²³⁹

The campaign to paint the West as godless deviants committed to destroying sovereignty and history is equally pervasive in Putin’s global rhetoric. According to him, the West is governed by a “radical-liberal agenda” that distorts history and cancels truth: “Such a deliberately perverted attitude towards history, its loose treatment distorts people’s consciousness, erodes values and undermines their footing in life. It is known that if someone wants to deprive a state of sovereignty and turn its citizens into vassals, they begin by rewriting the history of the country, depriving people of their roots, condemning them to oblivion.”²⁴⁰ Thus, the Kremlin deploys its ideology of “traditional values” to paint the West as barbaric and thoroughly corrupting of humanity, echoing Patriarch Kirill’s framing of the West as the “enemy of the human race.”²⁴¹ Again, in Putin’s words:

Look what they are doing to their own people. It is all about the destruction of the family, of cultural and national identity, perversion and abuse of children, including pedophilia, all of which are declared normal in their life. They are forcing the priests to bless same-sex marriages.... [the holy scripture and the main books of other world religions] are now being questioned.... Millions of people in the West realise that they are being led to a spiritual

238. *Id* (emphasis added).

239. *Id.*

240. *Meeting with Historians and Representatives of Russia’s Traditional Religions*, KREMLIN (Nov. 4, 2022), <http://en.kremlin.ru/events/president/news/69781>.

241. *His Holiness Patriarch Kirill Replies to the Appeal by His Holiness the Patriarch of Bulgaria*, *supra* note 97.

disaster.... We will protect our children from degradation and degeneration.²⁴²

This same agenda permeates the Kremlin's outreach and is illustrated in two brief examples addressing Russia's relations with Africa and the BRICS association. The Kremlin's 2023 FPC specifically addresses Russian interests in Africa, including giving priority to "sovereignty and independence of interested African states, including through security assistance" and "protecting traditional spiritual and moral values, and the right to freedom of religion."²⁴³ During the 2023 Russia-Africa Summit, Mali's military junta leader, Colonel Assimi Goïta, directed lengthy remarks at President Putin addressing a variety of topics, including UNSC reform and grain exports. Goïta also observed that despite the lack of "common languages or much in common with Russia," Mali shared "a commitment to traditional values that unite[s] us with Russia."²⁴⁴ In his brief response, Putin focused on Goïta's reference to traditional values and tied it back to his preoccupation with state sovereignty: "You said your country is committed to traditional values, and this is precisely what unites us—Russia and...the overwhelming majority of African nations. After all, traditional values are a foundation of our identity, our existence and our sovereignty. Our statehood rests on them."²⁴⁵

Putin offered a similar pitch premised on traditional values and sovereignty during the 2023 BRICS Plus outreach meeting. Recognizing the forum as affording a "very important communications framework" to over 50 "like-minded countries," Putin reiterated Russia's vision of an "emerging new world order" aligning itself against Western efforts "to destroy traditional values that are important to all of us: the family and respect for national and religious traditions." In Putin's view, these countries, representing the "global majority...[are] becoming increasingly tired of [Western] pressure and manipulation."²⁴⁶

Pivoting to activity in the West, much has already been written about the ROC's outreach—in tandem with other Kremlin proxies—to European and

242. *Presidential Address to Federal Assembly*, KREMLIN (Feb. 21, 2023), <http://en.kremlin.ru/events/president/news/70565>.

243. Foreign Policy Concept, *supra* note 182, art. 57.

244. Goïta is not alone in drawing this connection. The potential currency of traditional values in Russia's larger foreign relations agenda is similarly confirmed in remarks made by Pakistan's acting prime minister to President Putin: "I just realised that we are even more close culturally in terms of value systems. The Orthodox Christianity does represent cultural values which are very close to home – family, ethical values...we feel more near you." *Meeting with Acting Prime Minister of Pakistan Anwar-ul-Haq Kakar*, KREMLIN (Oct. 17, 2023), <http://en.kremlin.ru/events/president/news/72523>.

245. *Russia–Africa Summit*, KREMLIN (Jul. 28, 2023), <http://en.kremlin.ru/events/president/news/71826>; See also Ksenia Luchenko, *Propaganda in Holy Orders: Africa, Ukraine, and the Russian Orthodox Church*, ECFR (Sep. 20, 2023), <https://ecfr.eu/article/propaganda-in-holy-orders-africa-ukraine-and-the-russian-orthodox-church/> (discussing other relevant developments in Africa).

246. *Meeting in the BRICS Plus/Outreach Format*, KREMLIN (Aug. 24, 2023), <http://en.kremlin.ru/events/president/news/72096>.

American conservative political and religious circles. These connections are similarly platformed on advancing traditional values-based policy priorities.²⁴⁷ For example, through international meetups like the World Congress of Families,²⁴⁸ the ROC is able to network not only with like-minded civil society,²⁴⁹ but to “mingle[] with leaders of the Italian far right, the Austrian far right, and their comrades from the American heartland.”²⁵⁰ U.S.-based groups like C-Fam,²⁵¹ the National Organization for Marriage

247. After 86 years of schism, President Putin oversaw the reunification of the ROC and the ROC in 2007. Yuri Zarakhovich, *Putin’s Reunited Russian Church*, TIME (May 17, 2007), <https://content.time.com/time/world/article/0,8599,1622544,00.html>. ROCOR has supported Kremlin foreign policy and “played a role in its propaganda campaign.” During an August 2022 interview, Archbishop Gabriel of Montreal and Canada justified Russia’s invasion of Ukraine “in language that closely follows official Russian propaganda.” Andrei Soldatov & Irina Borogan, *Putin’s Useful Priests: The Russian Orthodox Church and the Kremlin’s Hidden Influence Campaign in the West*, FOREIGN AFFS. (Sep. 14, 2023), <https://www.foreignaffairs.com/ukraine/putins-useful-priests-russia-church-influence-campaign>. From the outset of the invasion, ROCOR hierarchs carefully avoided placing any blame on Russia for its actions. Instead, they urged parishioners “to refrain from excessive watching [of] television, following newspapers and the internet, [and] to close our hearts to the passions ignited by mass media” and reasoned, “It is not possible to agree with the extremely one-sided picture of current events portrayed by Western sources of information. Events, we know, are much more complex.” Metropolitan Hilarion, *Archpastoral Epistle to the Clergy and Flock of the Eastern American and Australian-New Zealand Dioceses on Great Lent and on the Events on the Holy Ukrainian Land*, ROCOR (Feb 24, 2022), https://www.synod.com/synod/eng2022/20220224_enmhstate mentukraine.html; *Statement by the Archpastors of the Russian Church Abroad in Europe on the Situation in East Ukraine*, ROCOR (Feb. 22, 2022), https://www.synod.com/synod/eng2022/20220224_enstatementeuropeanbishops.html.

248. Masha Gessen, *Family Values: Mapping the Spread of Antigay Ideology*, HARPER’S (Mar. 2017), <https://harpers.org/archive/2017/03/family-values-3/?single=1>. The Congress is organized by the International Organization of the Family (IOF), reportedly with funding provided by Orthodox oligarch Konstantin Malofeev. See Jason Horowitz, *Italy’s Right Links Low Birthrate to Fight Against Abortion and Migration*, N.Y. TIMES (Mar. 27, 2019), <https://www.nytimes.com/2019/03/27/world/europe/italy-verona-salvini-world-congress-of-families.html>.

249. See, e.g., Mark Silk, *The Other Russian Collusion Story*, RELIGION NEWS SERV. (Mar. 25, 2019), <https://religionnews.com/2019/03/25/the-other-russian-collusion-story/> (noting participation from “officials from Hungary and Moldova” at the Congress); Kara Fox, *In Italy’s City of Love, Global Far-Right Groups Join Forces under a ‘pro-family’ Umbrella*, CNN (Mar. 31, 2019), <https://www.cnn.com/2019/03/31/europe/verona-world-congress-of-families-intl/index.html> (noting one of the Congress speakers, Italy’s minister for family and disability, has blamed same-sex marriage, gender fluidity, and mass immigration for “wip[ing] out our community and our traditions” and that Verona’s mayor displays a “wooden cut-out of Russian President Vladimir Putin” as part of his office décor.).

250. Anne Applebaum, *The False Romance of Russia*, ATL. (Dec. 12, 2009), <https://www.theatlantic.com/ideas/archive/2019/12/false-romance-russia/603433/>.

251. C-Fam has fawned over the ROC’s rejection of a UNICEF brief calling for the elimination of discrimination based on sexual orientation and gender identity. See Stefano Gennarini, *Russian Orthodox Condemn UN Children’s Fund for Promoting Homosexuality*, C-FAM (Dec. 23, 2014), https://c-fam.org/friday_fax/russian-orthodox-condemn-unicef-childrens-fund-for-promoting-homosexuality.

(“NOM”),²⁵² and the International Organization of the Family (IOF)²⁵³ have also adopted the ROC’s traditional values agenda—replete with its Kremlin-endorsed pro-sovereignty and anti-human rights messaging—and used it to successfully lobby the U.S. government.²⁵⁴ The ROC’s ability to navigate

252. Conor Finnegan, *State Dept. Panel to Redefine Human Rights Based on ‘Natural Law and Natural Rights’*, ABC NEWS (May 31, 2019), <https://abcnews.go.com/Politics/state-dept-panel-redefine-human-rights-based-natural/story?id=63400485> (explaining that NOM is a nonprofit advocating against same sex marriage). NOM’s current president, Brian Brown, is also president of the IOF). *Brian Brown Named President of Anti-LGBT World Congress of Families*, S. POVERTY L. CTR. (Jun. 2, 2016), <https://www.splcenter.org/hatewatch/2016/06/02/brian-brown-named-president-anti-lgbt-world-congress-families>. NOM has partnered with Kremlin-linked groups. Rosalind S. Helderman & Tom Hamburger, *Guns and Religion: How American Conservatives Grew Closer to Putin’s Russia*, WASH. POST (Apr. 30, 2017), https://www.washingtonpost.com/politics/how-the-republican-right-found-allies-in-russia/2017/04/30/e2d83ff6-29d3-11e7-a616-d7c8a68c1a66_story.html (noting that Brown “visited Moscow four times in four years, including a 2013 trip during which he testified before the Duma as Russia adopted a series of anti-gay laws.”). As part of these burgeoning ties to Russia, Brian Brown is linked to Konstantin Malofeev, a Russian oligarch closely associated with the Kremlin and ROC, who is also the target of U.S., EU, and Canadian sanctions for his support of pro-Russian separatists in Ukraine’s Donbas region. See Hannah Levintova, *The World Congress of Families’ Russian Network*, MOTHER JONES (Feb. 21, 2014), <https://www.motherjones.com/politics/2014/02/world-congress-families-us-evangelical-russia-family-tree> (describing the connection between NOM and Malofeev’s St. Basil the Great Charitable Foundation, the largest Orthodox Charity in Russia); U.S. DEP’T. TREASURY, OFF. FOREIGN ASSETS CONTROL, SPECIALLY DESIGNATED NATIONALS AND BLOCKED PERSONS LIST (2024) (confirming U.S. sanctions in place against Malofeev); Maksym Bugriy, *Hot Issue—Konstantin Malofeev: Fringe Christian Orthodox Financier of the Donbas Separatists*, JAMESTOWN FOUND. (Aug. 8, 2014), <https://jamestown.org/program/hot-issue-konstantin-malofeev-fringe-christian-orthodox-financier-of-the-donbas-separatists/> (confirming Canadian and EU sanctions). NOM’s traditional values agenda has sought to supplant individual human rights and to oppose what it perceives as “a growing international threat against the family” stemming from “overreach by international institutions. NAUREEN SHAMEEM, RIGHTS AT RISK: THE OBSERVATORY ON THE UNIVERSALITY OF RIGHTS TRENDS REPORT 2017, ASS’N WOMEN’S RTS. DEV. 38 (2017), <https://www.awid.org/sites/default/files/atoms/files/rights-at-risk-ours-2017.pdf> (describing an “unholy alliance” between “traditionalist actors from Catholic, Evangelical, Mormon, Russian Orthodox, and Muslim faith backgrounds” who have “found common cause in shared talking points and advocacy efforts attempting to revert feminist and sexual rights gains at the international level.”).

253. IOF leadership previously endorsed the need to have Russia play “a very prominent role in the matter of family advocacy and moral values on a global scale” and celebrated Russians as “the Christian saviors of the world.” Hannah Gais, *In Search of the Russian Soul: How Russia Became the U.S. Far Right’s Mirror*, 99 PUBLIC EYE Q., Fall 2019, at 7, https://www.politicalresearch.org/sites/default/files/2020-08/ThePublicEye_2019_Fall_nobleeds.pdf; Natasha Bertrand, *I really believe that Russia is the leader of the free world right now*, BUSINESS INSIDER (Dec. 11, 2016), <https://www.businessinsider.com.au/russia-connections-to-the-alt-right-2016-11>. This is a view shared and disseminated within the Christian evangelical community as well. See, e.g., Scott Lively, *Report from Moscow*, SCOTT LIVELY MINISTRIES (Oct. 18, 2013), <https://www.scottlively.net/2013/10/18/report-from-moscow/> (noting “[h]ow incredibly ironic it is that Russia is now our best hope for stopping the conquest of the world by the ‘progressives.’”).

254. Consider for example the Trump administration’s co-sponsorship of the Geneva Consensus Declaration on Promoting Women’s Health and Strengthening the Family. GENEVA CONSENSUS DECLARATION ON PROMOTING WOMEN’S HEALTH AND STRENGTHENING THE

within these particular countries and among these constituencies is especially useful given the stigma that likely would attach to more direct Kremlin participation.

The ROC's function as a proxy for the Kremlin is evident in virtually all its activities, including seemingly religious gatherings. Consider an example from 2017, when the ROC played a starring role at the Billy Graham Evangelistic Association's World Summit in Defense of Persecuted Christians.²⁵⁵ At the summit itself—which drew “over 600 participants from 136 countries”²⁵⁶—Metropolitan Hilarion gained a direct platform to address a mass audience of Washington DC-connected faithful. In a twisted effort to push the ROC's larger traditional values agenda, Hilarion's speech essentially blamed homosexuality for the “genocide of Christians,” declaring that Western politicians and media encouraged a “conspiracy of silence” by “attempt[ing] to pass the problem over in silence and redirect the subject

FAMILY (Oct. 22, 2020), <https://web.archive.org/web/20210102030418/https://www.hhs.gov/sites/default/files/geneva-consensus-declaration-english.pdf>. This document invokes national sovereignty to reject any international right to abortion and frames women's right to sexual and reproductive health as exclusive of abortion. In addition, the Geneva Consensus Declaration selectively invokes language from the UN's 1995 Fourth World Conference on Women Beijing Declaration to limit the definition of family to a “harmonious partnership” between men and women while omitting its endorsement of “explicit recognition and reaffirmation of the right of all women to control all aspects of their health, in particular their own fertility” as “basic to their empowerment.” C-Fam asserted that it “worked for 24 years toward the [Geneva Consensus] declaration made by the Trump administration.” *Statement of Austin Ruse, President of C-Fam, on the Signing of the Geneva Consensus Declaration*, C-FAM (Oct. 22, 2020), <https://catholiccitizens.org/news/93078/statement-of-austin-ruse-president-of-c-fam-on-the-signing-of-the-geneva-consensus-declaration/>. The Biden administration withdrew U.S. co-sponsorship and signature from the Geneva Consensus Declaration in January 2021. Memorandum from the White House on Protecting Women's Health at Home and Abroad (Jan. 28, 2021) (accessible at <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/28/memorandum-on-protecting-womens-health-at-home-and-abroad/>). Several months later, C-Fam celebrated Russia's decision to sign the declaration. Lisa Correnti, *Russia Joins Global Pro-Life Initiative*, C-FAM (Oct. 28, 2021), https://c-fam.org/friday_fax/russia-joins-global-pro-life-initiative/. Efforts to rejoin this declaration continue in the U.S. Congress. See Expressing support for the Geneva Consensus Declaration on Promoting Women's Health and Strengthening the Family and urging that the United States rejoin this historic declaration, H.R. Res. 74, 118th Cong. (2023).

255. Elizabeth Dias, *Vice President Mike Pence Met Privately with Top Russian Cleric*, TIME (May 12, 2017), <https://time.com/4776717/mike-pence-russian-cleric-hilarion-alfeyev/>. The 2017 event grew out of a “fireside brainstorming session” between Rev. Franklin Graham, son of the late evangelical leader Billy Graham, and then DECR head Hilarion during Graham's 2015 visit to Moscow. On this 2015 trip Graham also met with Putin, “who promised he would do all he could to help their cause.” *Id.* Previously, Graham endorsed Putin's crackdown on LGBT rights in Russia, asserting that Putin “has taken a stand to protect his nation's children from the damaging effects of any gay and lesbian agenda.” COMM. ON FOREIGN RELS., *supra* note 176, at 52. See also *Metropolitan Hilarion Gives Interview to Interfax-Religion*, MOSPAT (May 16, 2017), <https://mospat.ru/en/news/48499/pdf/>.

256. Franklin Graham, *Franklin Graham: Persecution on an Unprecedented Scale*, BILLY GRAHAM EVANGELISTIC ASS'N (Jun. 1, 2017), <https://billygraham.org/story/franklin-graham-persecution-on-an-unprecedented-scale/>.

matter towards a politically correct discussion on tolerance to various minorities, sexual and otherwise.”²⁵⁷

Alone, the ROC’s presence at a showcase evangelical event in the U.S. capitol would be coup enough. But Hilarion’s mission was further enhanced by the release of a joint statement together with Graham, stressing “the importance of Russia and the United States setting aside their differences and working together to combat terrorism and protect Christians,” and urging “Christians and churches worldwide to pray for [the] important meeting” between Trump and Putin.²⁵⁸

The World Summit in Defense of Persecuted Christians also provided Hilarion with the opportunity to clock a stay at the Trump International Hotel and hold a *tête à tête* meeting with U.S. Vice President Mike Pence.²⁵⁹ Backstage at the summit, Hilarion lobbied Pence for the “necessity of forming a world anti-terrorist coalition... to overcome terrorist threat[s]”²⁶⁰ and urged that Russia and the U.S. “put [their] political differences aside.”²⁶¹ Later, replying to a question whether he would relay the meeting’s substance to President Putin, Hilarion offered: “I will report the results of the meeting to His Holiness Patriarch Kirill and, if he deems it necessary, he will convey this information to the Russian leadership.” He then added: “The major mass media, including the CNN, are carrying out a targeted propaganda campaign against [President Trump], in which the Russian card is also being played. We can only hope that he will keep his pre-election promises and exert efforts to get the dialogue with Russia on the right track. This dialogue will bring forth nothing but benefit.”²⁶²

Faced with its consistently close alignment to Kremlin views, it should come as no surprise that ROC activities abroad directed at fueling instability—including in the United States and other Western countries—have been linked “to Russian intelligence and the Russian government.”²⁶³ Indeed, “With so many Russian diplomats expelled from Europe, traditional options for Russian spies, who have often operated under diplomatic cover, are rapidly shrinking. For the Kremlin, the church, with its broad network of

257. *Presentation by the DECR Chairman Metropolitan Hilarion of Volokolamsk at the World Summit in Defense of Persecuted Christians*, MOSPAT (May 12, 2017), <https://mospat.ru/en/2017/05/12/news145803/>.

258. *Joint Statement from Franklin Graham and Metropolitan Hilarion*, BILLY GRAHAM EVANGELISTIC ASS’N (May 13, 2017), <https://media.billygraham.org/joint-statement-from-franklin-graham-and-metropolitan-hilarion/>.

259. Dias, *supra* note 255.

260. *Metropolitan Hilarion of Volokolamsk Meets with Vice President of the United States Michael R. Pence*, MOSPAT (May 11, 2017), <https://mospat.ru/en/2017/05/11/news145766/>.

261. Dias, *supra* note 255. (“A White House spokesman confirmed Pence’s meeting with Hilarion and said the cleric’s comments also reflected President Trump’s views.”).

262. *Metropolitan Hilarion Gives Interview to Interfax-Religion*, *supra* note 255.

263. Soldatov & Borogan, *supra* note 247. In early 2023, “the FBI privately warned members of the Orthodox community in the United States that Russia was likely using the church to help recruit intelligence sources in the West.... Given the church’s well-established presence in Western countries, these links could also complicate efforts to build an effective Russian opposition abroad.” *Id.*

parishes, can provide a palatable alternative.”²⁶⁴ Even setting the issue of ROC infiltration aside, the Church retains powerful support in this region from the Russian Orthodox Church Outside of Russia (ROCOR), its semi-autonomous Western counterpart that remains bound to the Moscow Patriarchate and its Holy Synod. For the most part, ROCOR hierarchs have studiously avoided condemning Russia’s invasion of Ukraine,²⁶⁵ have rejected the OCU as uncanonical, and have consistently prioritized legitimizing Kremlin and ROC preoccupation with the fate of the UOC-MP. These hierarchs have also regurgitated similar institutional messaging condemning supposed Western hypocrisy surrounding human rights issues.²⁶⁶

264. *Id.* See also *Russian Patriarch Kirill Spied in Switzerland for KGB in 70s: Media*, FRANCE24 (Feb. 6, 2023), <https://www.france24.com/en/live-news/20230206-russian-patriarch-kirill-spied-in-switzerland-for-kgb-in-70s-media>.

265. A statement issued by the Chancery of the Synod of ROCOR Bishops in March 2022 sought to dispel rumors that it intended to discontinue commemoration of Patriarch Kirill. The Synod stressed it had “made no such decision,” and expressed unity “in prayer for the speedy conclusion of military actions and for the arrival of peace.” *Statement from the Chancery of the Synod of Bishops*, ROCOR (Mar. 24, 2022), https://www.synod.com/synod/eng2022/20220324_ensynod.html?fbclid=IwAR26kYTRm1BQCPaQqfiaMHPXNZ2hzbjWtalMOAvq6QrQl1vOON8YDEh2PuU. Additional background on ROCOR’s position is provided above. See Soldatov & Borogan, *supra* note 247.

266. *Metropolitan Mark of Berlin and Germany Makes an Appeal on Attacks on the Canonical Ukrainian Orthodox Church (Video)*, ROCOR (Dec. 22, 2022), https://www.synod.com/synod/eng2022/20221222_enmetmark.html (asking “How do such [violations against the UOC-MP] correspond to liberal-democratic values, to religious liberty? We call upon all our fellow citizens, the Church and politicians not to close their eyes but to lift their voices and demand the restoration and observance of elementary human rights in Ukraine.”). The ROCOR-affiliated Fund for Assistance to the ROCOR (FFA) has conveyed the same message, in still stronger terms: “[Ukrainian] authorities are just warming up. They are determined to wipe out the canonical Ukrainian Orthodox Church and replace it with the OCU.... They are starving the canonical monks out of the Lavra.” *Help the Kiev Caves Lavra!*, FUND FOR ASSISTANCE TO THE ROCOR, https://fundforassistance.org/news_230308_1. The FFA is prominently advertised on ROCOR’s homepage. Amidst this official support, there are some mixed levels of more critical treatment of Russia’s action. See Jack Jenkins, *Eastern Orthodox Priests in Russia Denounce Invasion of Ukraine at Their Own Peril*, WASH. POST (Mar. 9, 2022), <https://www.washingtonpost.com/religion/2022/03/09/eastern-orthodox-priests-russia-denounce-invasion-ukraine-their-own-peril/>; Pjotr Sauer, *Russian Orthodox Church in Amsterdam Announces Split with Moscow*, GUARDIAN (Mar. 13, 2022), <https://www.theguardian.com/world/2022/mar/13/russian-orthodox-church-in-amsterdam-announces-split-with-moscow>; Metropolitan Jean of Doubna, *Communiqué: Aide Pour l’Ukraine*, ARCHBISHOP ORTHODOX CHURCHES RUSS. TRADITION W. EUR., <https://archeveche.eu/communique-aide-pour-lukraine/> (demanding Patriarch Kirill intervene with Russian authorities to end the war); *Metropolitan Mark (ROCOR): War Is Negatively Affecting Russian Church, Must Stop Immediately*, ORTHODOX CHRISTIANITY (Jun. 1, 2022), <https://orthochristian.com/146493.html> (still without condemning Russia, the Metropolitan reasons he “can’t subscribe to [the] point of view ‘that the war is about Russia defending itself.’”). Where possible, the Kremlin and ROC clamp down on these manifestations of dissent. See Maria Katamadze, *Anti-War Russian Clergy Face Punishment*, DEUTSCHE WELLE (Oct. 15, 2023), <https://www.dw.com/en/like-partisans-anti-war-russian-clergy-face-punishment/a-67103511>; Kostya Manenkov, *Russian Orthodox Priests Face Persecution from State and Church for Supporting Peace in Ukraine*, ASSOCIATED PRESS (Aug. 12, 2023), <https://apnews.com/article/russia-orthodox-church-defrocked-priests-ukraine-war-21660b57105a95a04e6321fb8baffa9e>.

B. The Kremlin's Measure of Success

The Kremlin clearly attributes value to the ROC as a tool for advancing Russian interests. The ROC's usefulness is particularly unique considering its theological underpinnings, appearance of institutional autonomy, and global footprint. The extent to which the Kremlin attributes success to the ROC's activities can be measured in several different ways. At the most basic level, the ROC is the recipient of a substantial share of grants issued by the Russian government.²⁶⁷ Additionally, the ROC continues to play a central role in facilitating the Kremlin's broader "compatriots" strategy, and the larger Russkiy Mir initiative described above. In taking on these roles, the ROC conveys Russian soft power and influence across the globe. This pivotal role may also help explain why the Kremlin continues to dedicate state funding to procuring and building high profile churches both at home and abroad, either directly or through its government-controlled corporate entities.

For example, in 2010 then President Medvedev directed €73M in state funds²⁶⁸ to purchase a UNESCO World Heritage-listed plot of land in Paris,²⁶⁹ "*à deux pas de la tour Eiffel*," with an eye to building a "spiritual and cultural center." By the time construction completed in 2016, the center—including its new Orthodox church, the Holy Trinity Cathedral—had rung up an additional price tag of approximately €100M in building costs.²⁷⁰ The Russian government subsequently succeeded in attaching diplomatic protection to the multimillion-dollar facility.²⁷¹ Now dubbed the "little Kremlin-on-Seine" and

267. *Orthodox Church Receives Majority of Russian Government Grants*, MOSCOW TIMES (Dec. 22, 2015), <https://russialist.org/orthodox-church-receives-majority-of-russian-government-grants/> (A 2015 study concluded that the ROC receives most of the Russian government's financial grants); See also Shura Collinson, *Russian Government Gives Church \$40 Million to Set Up Spiritual Centers*, MOSCOW TIMES (Nov. 28, 2014), <https://www.themoscowtimes.com/2014/11/28/russian-government-gives-church-40-million-to-set-up-spiritual-centers-a41829>.

268. Alicia Paulet, *Église russe du Quai Branly, un chantier à rebondissements* [*Russian Church of Quai Branly, a Construction Site Full of Twists and Turns*], LE FIGARO (Mar. 19, 2016), <https://www.lefigaro.fr/culture/2016/03/19/03004-20160319ARTFIG00028-eglise-rus-se-du-quai-branly-un-chantier-a-rebondissements.php>.

269. Antoine Blua, *Russian 'spiritual centre' Set to Open in the Heart of Paris*, GUARDIAN (Oct. 19, 2016), <https://www.theguardian.com/world/2016/oct/19/russian-spiritual-centre-set-to-open-in-the-heart-of-paris>.

270. *Orthodox Cultural Center*, WILMOTTE, <http://www.wilmotte.com/en/project/404/The-Russian-Orthodox-Spiritual-and-Cultural-Center> (last visited Apr. 23, 2024) (detailed photos of the project, describing construction of "an orthodox Cathedral, an administration center, an educational center and a cultural center.").

271. *Société Hulley Enterprises Limited (Chypre) v. Fédération de Russie*, Tribunal de Grande Instance de Paris, N° RG: 15/00323, at 2-6 (Apr. 28, 2016), <https://www.italaw.com/sites/default/files/case-documents/italaw7614.pdf>. The court accepted Russia's immunity from execution argument, reasoning that the cultural center fell within the cultural property exemption envisioned under the UN Convention on Jurisdictional Immunities of States and Their Property. For related media coverage of the case, see Renaud Lecadre, *A Paris, un Chantier Russe pas très Catholique* [In Paris, a Not-so-Catholic Russian Construction Site], LIBERATION (Oct. 10, 2016), https://www.liberation.fr/planete/2016/10/10/a-paris-un-chantier-russe-pas-tres-catholique_1521055.

“Saint-Vladimir” in the press, it is clear that controversy surrounding the property and its intended purpose still lingers.²⁷²

Paris is not the only city where the ROC’s international activities are underwritten by, and operate in lockstep with, the Kremlin. Strasbourg’s Church of All Saints, consecrated in 2018,²⁷³ reinforces the ROC’s intentional effort to build out its position as an echo for the Kremlin—and the Kremlin’s support for this mission. In 2011, the city of Strasbourg agreed to grant the ROC a parcel of land in the heart of the posh “Conseil des Quinze” neighborhood, nestled amidst diplomatic missions and a stone’s throw from the EU Parliament and CoE.²⁷⁴ In choosing to build a new church, the ROC sought out “a prestigious and visible presence vis-à-vis the COE.”²⁷⁵ An essay outlining the “Necessity of [an] Orthodox Church in Strasbourg,” found on the parish’s website, attests to this fact. Among the rationales proffered for building the church, three are especially noteworthy: First, Strasbourg’s “strategic nature as...a political center of Europe”; second, “witness[ing] ideals of Holy Russia in the middle of Western Europe”; and third, providing a venue for “[h]igh-level meetings of religious figures, cultural representatives, scientists and politicians of East and West...to discuss contemporary issues of social development in European countries.”²⁷⁶

272. Media reports claim French “counterespionage services have surrounded the building with jamming devices to prevent the Russians from using it for electronic surveillance.” Antoine Blua, *Russia Unveils Cultural, Orthodox Jewel on the Seine*, RFE/RL (Oct. 17, 2016), <https://www.rferl.org/a/russia-paris-orthodox-cathedral-cultural-center-to-open/28058923.html>.

273. *His Holiness Patriarch Kirill Consecrates the Church of All Saints in Strasbourg*, MOSPAT (May 26, 2019), <https://mospat.ru/en/2019/05/26/news174443/>. The ROC had maintained a representative office in Strasbourg since 2002. This representative office’s web presence is underwritten by VEB.RF. VEB.RF is Russia’s national economic development institution, “a state corporation established by Russian federal law exclusively for the public good,” whose capital is comprised of “funds and other property contributed by the Russian Federation [and] direct contributions from the Federal Budget.” *Our Development Strategy—Russia’s Development Strategy*, VEB, <https://veb.ru/en/about-us/> (last visited Apr. 23, 2024). According to the VEB.RF website, its “program of charitable activity provides for rendering assistance to healthcare institutions (procurement of medical equipment), the Russian Orthodox Church (renovation of culturally and historically significant churches) and nongovernmental organizations involved in supporting disadvantaged social groups—GPW veterans, disabled persons, orphanages.” *Sponsorship and Charity*, VEB, https://veb.ru/en/about-us/social-responsibility/sponsorship-and-charity/index.php?sphrase_id=46916 (last visited Apr. 23, 2024).

274. *Notre église de Tous les Saints [Our Church of All Saints]*, PARISH CHURCH ALL SAINTS STRASBOURG, http://www.ruhram.eu/fr/La_Construction/overview_fr.html (last visited Apr. 23, 2024).

275. Sebastian Rimestad, *International Law and the Transnational Dimension of the Russian Orthodox Church*, in *RUSSIAN DISCOURSES ON INTERNATIONAL LAW: SOCIOLOGICAL AND PHILOSOPHICAL PHENOMENON* 169 (Sean P. Morris ed., 2018).

276. *Necessity of Orthodox Church in Strasbourg*, PARISH CHURCH ALL SAINTS STRASBOURG, <http://www.ruhram.eu/en/project/necessity.html> (last visited Apr. 23, 2024). The parish’s website also boasts a video featuring a model of the church that stresses its strategic location next to key European institutions, rather than any need it will fill for Strasbourg’s Orthodox faithful. *Модель храма Всех Святых в Страсбурге [Model of the Church of All Saints in Strasbourg]*, YOUTUBE (May 25, 2013), <https://www.youtube.com/watch>

More directly, the prominence of the new church facilitated the ROC's efforts to build goodwill for Russia and lobby Strasbourg's diplomatic network.²⁷⁷ Media reports at the time noted that the new church—estimated to cost 11 million Euros—testified to the power of the ROC in a city that accounted for only a small Orthodox community.²⁷⁸ While ROC officials claimed donations for the construction costs were to be solicited “exclusively from private sources,”²⁷⁹ evidence suggests steady assistance from the Russian government. At the consecration ceremony, Patriarch Kirill presented awards to select individuals who assisted in the construction of the church. Notable among them was Mikhail Margelov, Vice-President of Transneft, the Russian government-owned oil pipeline company,²⁸⁰ who received the Order of the Blessed Prince Daniel of Moscow (III degree).²⁸¹ Transneft's 2018 annual report highlights three projects as “[a]mong the most significant projects supported by Transneft.” Two of these projects related to church construction, one of which was “[c]ompletion of the construction of the Church of All Saints in Strasbourg, France.”²⁸² According to public estimates, Transneft covered over 70% of the church's price tag.²⁸³ Driving home the inseparable political motive underlying the “white swan of

?v=UGMgTDYFq6l&feature=youtu.be. Perhaps signaling the lack of demand for the church, since being uploaded in 2013, the video has received fewer than 4,000 views and only 15 “thumbs up.” *Id.*

277. *Strasbourg se dote d'une église orthodoxe* [Strasbourg gains an Orthodox Church], LES ECHOS (Jun. 18, 2019), <https://www.lesechos.fr/pme-regions/grand-est/strasbourg-se-dote-dune-eglise-orthodoxe-1030234>.

278. *A Strasbourg, une église orthodoxe russe flamboyante neuve* [In Strasbourg, a Brand New Russian Orthodox Church], NOUVEL OBS (Jun. 18, 2019), <https://www.nouvelobs.com/societe/20190618.AFP8690/a-strasbourg-une-eglise-orthodoxe-russe-flamboyante-neuve.html>.

279. *Construction of First Orthodox Church in Strasbourg Begins*, SOC (Dec. 10, 2013), http://www.spc.rs/eng/construction_first_orthodox_church_strasbourg_begins.

280. State representatives in Transneft's governing bodies “determine the strategic directions of its development and control its production, business and financial activities.” Moreover, “100% of ordinary voting shares of Transneft belong to the Russian Federation represented by the Federal Agency for State Property Management.” TRANSNEFT, ANNUAL REPORT 2016, at 132 (2016), https://web.archive.org/web/20220119072527/https://www.transneft.ru/u/section_file/28150/go2016_eng.pdf. Transneft has a long track record of funding the ROC's building and restoration projects. *Id.* at 85. The company is also subject to U.S. and EU sanctions since 2014.

281. *Святейший Патриарх Кирилл Совершил Великое Освящение Храма Всех Святых в Страсбурге* [His Holiness Patriarch Kirill Performed the Great Consecration of the Church in All Saints in Strasbourg], ORTHODOX CHRISTIANITY (May 27, 2019), <https://pravoslavie.ru/121423.html>.

282. TRANSNEFT, ANNUAL REPORT 2018, at 101 (2018), https://web.archive.org/web/20220119044307/https://www.transneft.ru/u/section_file/40291/2019.08.13_go_2018_en.pdf.

283. *A Strasbourg, une église orthodoxe russe flamboyante neuve*, *supra* note 278. The state has made use of other “soft” avenues for relaying funds to the ROC. *Russian State Bank Helps Controversial Church-Building Fund*, MOSCOW TIMES (Jul. 16, 2015), <https://www.themoscowtimes.com/2015/07/16/russian-state-bank-helps-controversial-church-building-fund-a48220>.

Strasbourg,”²⁸⁴ Patriarch Kirill used his visit intended to consecrate the new church to squeeze in meetings with the CoE Secretary General and the CoE Commissioner for Human Rights for the express purpose of lobbying for Russia’s readmission to the body following its 2014 takeover of Crimea.²⁸⁵

A more recent example of Kremlin financing of Orthodox churches abroad brings us back to the Balkans and construction of the Memorial Orthodox Cathedral of Saint Sava in Belgrade, Serbia. During a 2019 meeting, Serbian President Vučić expressed “[m]any thanks to Russia—for all the funds provided for the decoration and construction of the Church of Saint Sava. Russia is to allocate another five million euros for our holy site.”²⁸⁶ A year later, former SOC Patriarch Irinej expressed his gratitude to Foreign Minister Lavrov “for the great aid of the President of the Russian Federation...in providing 10 million euros for making mosaics” for the cathedral.²⁸⁷

It bears noting here that the Kremlin’s satisfaction with the ROC’s usefulness and performance fortifying Russia’s interests is equally demonstrated in the 2020 consecration of a “mega-church” for Russia’s

284. *His Holiness Patriarch Kirill Consecrates the Church of All Saints in Strasbourg*, *supra* note 273.

285. Russia’s permanent representative to the CoE attended both meetings. *In Strasbourg His Holiness Patriarch Kirill Meets with Mr. Thorbjørn Jagland, Secretary General of the Council of Europe*, MOSPAT (May 27, 2019), <https://mospat.ru/en/2019/05/27/news174549/>; *Patriarch Kirill meets with Council of Europe Commissioner for Human Rights*, MOSPAT (May 27, 2019), <https://mospat.ru/en/2019/05/27/news174552/>. Having the Patriarch lobby on behalf of Russia’s political interests is far removed from the spiritual endeavor of tending to the local faithful. But this decidedly political matter is precisely what Kirill sought to address. In the Patriarch’s assessment, the conversation “was positive and substantial... I don’t want to go into detail, because this is a political issue.” Still, he ventured, “In the attitude of the [CoE] secretary general I saw nothing that could prevent Russia from resuming her participation in the work of this organization.” *The Patriarch Added That the Council of Europe’s Decisions Were Important for Ordinary People Living in Europe as Well*, TASS (May 27, 2019), <https://tass.com/society/1060277>; *In Strasbourg His Holiness Patriarch Kirill Meets with Mr. Thorbjørn Jagland, Secretary General of the Council of Europe*, REOR (May 27, 2019), <http://strasbourg-reor.org/?topicid=1344>.

286. *Following Russian-Serbian talks, Vladimir Putin and Aleksandar Vucic Gave a Joint News Conference*, KREMLIN (Jan. 17, 2019), <http://en.kremlin.ru/events/president/transcripts/59693/print>. In August 2016, representatives of Russia and Serbia signed an agreement on the donation of over \$4 million for the adornment of the St. Sava Church. St. Sava is one of the largest Orthodox churches in the world. *See Large-Scale Mosaics from Russia Arrive at St. Sava’s in Belgrade*, ORTHODOX CHRISTIANITY (May 4, 2017), <https://orthochristian.com/103195.html>. Russian government-owned Gazprom Neft was also involved in the financing of cathedral. *Gazprom Neft Finances the Creation of Interior Mosaic in Saint Sava Temple in Belgrade*, NIS GROUP (Aug. 30, 2016), <https://www.nis.rs/en/news-arc/hive/gazprom-neft-finances-the-creation-of-interior-mosaic-in-saint-sava-temple-in-belgrade/>. For more on the ROC’s role, see *Agreement Signed for Russian Help Decorating St. Sava’s Cathedral in Belgrade*, ORTHODOX CHRISTIANITY (Aug. 31, 2016), <https://orthochristian.com/96820.html>.

287. *Patriarch Irinej of Serbia Received the Minister of Foreign Affairs of the Russian Federation, Sergei Lavrov*, ORTHODOX TIMES (Jun. 19, 2020), <https://orthodoxtimes.com/russian-fm-lavrov-expressed-his-support-for-serbian-orthodox-church-in-montenegro/>.

armed forces at Patriot Park, “a sprawling military theme park and exhibition center” on the outskirts of Moscow.²⁸⁸ The “Main Cathedral of the Russian Armed Forces”²⁸⁹ (Cathedral in Honor of the Resurrection of Christ) was conceived as a symbol of the intimate relations between church and state²⁹⁰ and confirms the Russian military’s zeal for “inculcat[ing] the Orthodox tradition.”²⁹¹ Although the cost for this massive project was to be paid entirely through donations, reports indicate the Kremlin covered at least \$40 million.²⁹² On the cathedral grounds, monuments honor the patron saints the ROC has attached to each branch of Russia’s military.²⁹³

Perhaps even more telling than the military cathedral, in July 2023, President Putin authorized the creation of a Foundation for the Preservation, Reconstruction of the Historical Image, and Development of Sergiyev Posad. Through this executive order, Putin has prioritized the development of the area, home to the Trinity-Sergius monastery, as “a national spiritual centre, and a tourist destination.”²⁹⁴ The move thus advances a \$2 billion ROC vision for a state-funded “Orthodox Vatican” in the historic city.²⁹⁵ This decision

288. *In Photos: Russia Unveils New Military Mega-Church*, MOSCOW TIMES (Apr. 27, 2020), <https://www.themoscowtimes.com/2020/04/27/in-photos-russia-unveils-new-military-mega-church-a70110>.

289. Russia’s Ministry of Defense boasts a website dedicated to the cathedral. See *Patriarchal Cathedral for the Name of the Resurrection of Christ*, GHVS, <https://web.archive.org/web/20230423023958/https://hram.mil.ru/> (last visited Apr. 23, 2024).

290. Andrew Higgins, *A ‘Breakdown of Trust’: Pandemic Corrodes Church-State Ties in Russia*, N.Y. TIMES (May 5, 2020), <https://www.nytimes.com/2020/05/05/world/europe/russia-orthodox-church-coronavirus.html>.

291. *God’s Army: Religious Zeal Is Surging in Russia’s Military Force*, ECONOMIST (May 29, 2019), <https://www.economist.com/erasmus/2019/05/29/religious-zeal-is-surging-in-russias-military-forces>.

292. *Russia’s Controversial New Military Cathedral Is Consecrated*, RFE/RL (Jun. 15, 2020), <https://www.rferl.org/a/consecration-of-the-main-cathedral-of-russian-armed-forces/30671707.html>.

293. *God’s Army: Religious Zeal Is Surging in Russia’s Military Force*, *supra* note 291. Inside the cathedral, as a stark reminder of the Church’s blessing of the Kremlin’s ventures abroad, the ROC planned to install an elaborate mosaic entitled “Bloodless joining of Crimea to Russia” depicting President Putin alongside “people celebrating the March 2014 event.” President Putin expressed reservations: “Some day grateful future generations will appreciate our achievements but it’s too early to do this now.” The Church quickly relented, scrapping the mosaic because it was “the wish of the head of the country.” *Russia Ditches Putin Mosaic in Army Church*, FRANCE24 (May 1, 2020), <https://www.france24.com/en/20200501-russia-ditches-putin-mosaic-in-army-church>. See also *Russia’s New Military Mega-Church to Feature Putin, Stalin, Crimea Mosaics*, MOSCOW TIMES (Apr. 24, 2020), <https://www.themoscowtimes.com/2020/04/24/russias-new-military-mega-church-to-feature-putin-stalin-crimea-mosaics-a70100>.

294. *Executive Order on Foundation for the Preservation, Reconstruction of the Historical Image, and Development of Sergiyev Posad*, KREMLIN (Jul. 14, 2023), <http://en.kremlin.ru/acts/news/71672>.

295. *Russian Church Plans \$2Bln ‘Orthodox Vatican,’* MOSCOW TIMES (June 27, 2019), <https://www.themoscowtimes.com/2019/06/27/russian-church-plans-2-bln-orthodox-vatican-a66182>; Vladimir Rozanskij, *A Fortress-Like Vatican for the Russian Orthodox Church*,

potentially overshadows the Kremlin's financial commitment to the military cathedral, and similarly surpasses the reported commitment of \$43 million by the Kremlin's property management department to finance luxury renovations for Patriarch Kirill's residence outside St. Petersburg.²⁹⁶ It also appears poised to revive the Soviet Union's ill-fated dream to create a Russian Vatican "as a major agent for bringing Eastern Europe and the Middle East under Soviet control."²⁹⁷ At that time, "[d]espite the atheistic nature of the communist state...its interests and those of the ROC seemed to coincide," favoring a push to displace the influence of the Ecumenical Patriarchate and the Vatican in these regions.²⁹⁸ Today, by doubling down on its empowerment of the ROC, the Kremlin aspires to try its hand again at building a centralized base for amplifying Eastern Orthodoxy to finally displace the "Western" Ecumenical Patriarchate on the world stage, while also harnessing this voice to launch a more unified attack against the West through manipulation of the larger Orthodox world.²⁹⁹

To be certain, these examples illustrate high-profile cases. But the pattern is discernable on a broader, even if less prominent, scale—both abroad and at home. In Africa, for example, churches that renounce the Ecumenical Patriarchate in favor of the ROC are treated to Russian-funded restoration of frescoes, other repairs, and the construction of classrooms that offer Russian language instruction.³⁰⁰ In 2019, the ROC estimated that nearly 10,000 new Orthodox churches had been built since 2009, reflecting "a growth of 32 percent." According to the Church, these figures "are for Russian Orthodox parishes all over the world, though in Russia itself the figures are more modest."³⁰¹ In other words, construction abroad is outpacing its domestic counterpart.

ASIANEWS (Sep. 17, 2018), <http://www.asianews.it/news-en/A-fortress-like-Vatican-for-the-Russian-Orthodox-Church-44953.html>.

296. *Kremlin Is Spending \$43M to Renovate Imperial Mansion for Orthodox Patriarch*, *Media Reports*, MOSCOW TIMES (May 21, 2019), <https://www.themoscowtimes.com/2019/05/21/kremlin-is-spending-43-million-renovate-imperial-mansion-orthodox-patriarch-a65667> (reporting the Patriarch's residence "occup[ies] the equivalent of 14 typical three-bedroom homes.").

297. Beginning in the mid-1940s, Stalin's plan envisioned the creation of a 'Moscow Vatican' as engendering "a Moscow-centered transformation of the Orthodox world." Dmitrii Sidorov, *Post-Imperial Third Romes: Resurrections of a Russian Orthodox Geopolitical Metaphor*, 11 *GEOPOLITICS*, no. 2, 2006, at 324.

298. Czekalski, *supra* note 30, at 209.

299. HEATHER A CONLEY & DONATIENNE RUY, *THE KREMLIN PLAYBOOK 3: KEEPING THE FAITH* 4 (2022), <https://archons.org/the-kremlin-playbook-keeping-the-faith/>.

300. David Pilling & Andres Schipani, *How Moscow Bought a New Sphere of Influence on the Cheap*, *FIN. TIMES* (Feb. 7, 2023), <https://www.ft.com/content/0c459575-5c72-4558-821e-b495c9db9b6f>.

301. Vladimir Ruvinsky, *Russians Are Not Waiting for a Church Boom*, *MOSCOW TIMES* (May 29, 2019), <https://www.themoscowtimes.com/2019/05/29/russians-are-not-waiting-for-a-church-boom-a65792>. Controversy sometimes attaches to church construction inside Russia. *See, e.g.*, Maxim Trudolyubov, *Russia: A Church-Building Nation Whose Traditionalism Is a Myth*, *WILSON CTR.* (May 17, 2019), <https://www.wilsoncenter.org/blog-post/russia-church-building-nation-whose-traditionalism-myth> (observing that the "planning or building of new

It is undeniable that the endeavor of church construction may be driven by a sincere spiritual impetus to bring people closer to faith. At the same time, many of these properties are inexorably linked to the projection of Russian power through government financing, their strategic and high-profile location, and the ROC's explicit political entanglement with the Kremlin. As noted by one observer, in certain instances, the Church "seems more interested in pursuing the grand idea of influential centers of the 'Russian World' across Europe than in integrating existing communities of exiled Russians and other Orthodox faithful.... [T]he ROC wants to establish embassies, representing the might and prestige of the Moscow Patriarchate, not cultural or religious associations to serve the spiritual needs of the local Orthodox."³⁰² The ROC, however, wields a ready response to this type of critical scrutiny. In Kirill's words: "who can harbour malice against building an altar dedicated to the Lord and Saviour? Only an enemy of the Saviour."³⁰³

VI. CONCLUSION

ROC operations in the Balkans and beyond dutifully support Russian interests. As the embodiment of Russia's new civilizational identity, the ROC uses its spiritual clothing to communicate Kremlin narratives to a broad range of grassroots and high-level audiences, including other Orthodox churches, other religious organizations, politicians, and NGOs. The ROC's consistent messaging—whether couched in a history of pan-Slavic brotherhood, traditional values or state sovereignty—reinforces Kremlin policy goals by simultaneously boosting Russia's profile as the protector of these norms and diminishing the allure of Western integration as posing a direct threat to them.

Given the Kremlin's substantial and consistent financial backing for the ROC, as well as its full-throated endorsement of protecting Orthodoxy as a key component of Russia's constitution and national security agenda, it plainly attributes significant value to the ROC's ongoing activities.³⁰⁴ In securing the ROC's unwavering fidelity, therefore, the Kremlin has landed a useful ally that is well-connected, often deeply embedded in local societies, and—at least at first glance—seemingly autonomous and disassociated from

churches in Russia's cities sometimes cause tensions, and the resulting conflicts often turn virulent or even violent.").

302. Rimestad, *supra* note 275, at 172. An example of this phenomenon is evident in Sochi. See Simon Shuster, *Sochi's Olympic Cathedral May Be Its Holiest White Elephant*, TIME (Feb 16, 2014), <https://time.com/8391/sochi-olympics-cathedral/> (noting the purpose-built "cathedral served its first essential function—a photo opportunity for Putin. But whom it will serve when the Olympics leave town is so far a bit of a mystery.").

303. *In Conclusion of His Visit to Strasbourg Patriarch Kirill Answered Questions from Journalists*, REOR (May 25, 2019), <http://strasbourg-reor.org/?topicid=1345>.

304. As one group of Russian scholars recently concluded: "it seems undeniable to us that increasing the activity of the Russian Orthodox Church in the international arena should serve to strengthen the influence not only of Orthodoxy in the world but also of the geopolitical positions of the Russian state as a whole." STANISLAV K. OSIPOVO ET AL., *Social Role of the Russian Orthodox Church in the World Political and Legal System*, in BUSINESS 4.0 AS A SUBJECT OF THE DIGITAL ECONOMY 1007 (E.G. Popkova ed., 2022).

government control. Furthermore, as but one element of the Kremlin's broader disinformation strategy, the ROC's active stoking of local instability breeds confusion and uncertainty, thus making a key contribution to the overall effort to unsettle and destabilize Western efforts to achieve both internal and global stability.

Geographic spaces and fault lines where the ROC and Kremlin use shared messaging to echo and reinforce Russia's allure, or to reproach the West for its liberalizing influence, are vast. Two brief examples drive home this reality. First, specifically in the Balkans, the Kremlin continues to press Serb claims in BiH and Kosovo, and to fuel interethnic strife in opposition to the West. It accomplishes this by drawing an analogy between the Serb situation and the alleged treatment of Russian compatriots in the Donbass and Crimea: "The whole world sees how the sad history of the Minsk agreements on Ukraine is repeated in the Balkans."³⁰⁵ Meanwhile, the allied SOC has characterized Kosovar policies as having the "sole objective" of completely expelling the Serbian people and "establish[ing]...an ethnically homogenous Albanian Kosovo,"³⁰⁶ all the while celebrating Russia for its "support in the struggle for justice and peace, for Kosovo and Metohija."³⁰⁷ For its part, the ROC has consistently endorsed Kremlin and SOC perspectives, supporting the SOC's (and Serbia's) "historical canonical territory, which certainly includes Kosovo."³⁰⁸

Second, further afield in Africa, the Kremlin's pro-sovereignty, non-interference drumbeat resonates alongside traditional values messaging to

305. *Article by the Minister of Foreign Affairs of the Russian Federation Sergey Lavrov, MOUVEMENT INTERNATIONALE RUSSOPHILE* (Oct. 10, 2023), <https://mir2023.site/2023/10/12/statya-ministra-inostrannyh-del-rossijskoj-federaczii-s-v-lavrova-10-oktyabrya-2023-goda/>. For Lavrov, "oppressing Russian-speaking people in Ukraine [was equal to] genuine aggression." *Foreign Minister Sergey Lavrov's Interview with the Great Game Programme on Channel One, MINISTRY FOREIGN AFFS. RUSS. FED.* (Dec. 28, 2022 8:16 PM), https://mid.ru/en/foreign_policy/news/1845915/. Serb president Vučić similarly accuses the West of hypocrisy, claiming its recognition of Kosovo's independence was based on the same justification as Russia's war on Ukraine. *Standoff between Kosovo Police and Serbian Gunmen Ends with Four Killed, GUARDIAN* (Sep. 24, 2023), <https://www.theguardian.com/world/2023/sep/24/gunmen-northern-kosovo-monastery-albin-kurti>. See also *Briefing by Foreign Ministry Spokeswoman Maria Zakharova, supra* note 187 ("Terror against Serbs is becoming even more brutal, and the provocations are becoming more devious.").

306. *Communiqué of the Holy Synod of Bishops of the Serbian Orthodox Church, SOC* (Sep. 28, 2023), <https://spc.rs/en/communique-of-the-holy-synod-of-bishops-of-the-serbian-orthodox-church/>.

307. *Patriarch Porfirije: Kosovo and Metohija are our spiritual Jerusalem, PATRIARCHIA* (Jan. 21, 2022), <http://www.patriarchia.ru/en/db/text/5890169.html>. For Kosovar officials, the recent Serb attack in Banjska was intended to create a pretext for Serbian forces to intervene to "protect" ethnic Serbs in northern Kosovo. See Lisa O'Carroll & Julian Borge, *Kosovo Serb Politician Arrested Over Role in Armed Ambush of Police, GUARDIAN* (Oct. 3, 2023), <https://www.theguardian.com/world/2023/oct/03/belgrade-police-arrests-kosovo-serb-politician-milan-radoicic>.

308. *Concern Expressed in the Russian Orthodox Church for the Destiny of Christian Shrines in Kosovo, PATRIARCHIA* (Oct. 4, 2021), <http://www.patriarchia.ru/en/db/text/5850449.html>.

“weaken[] Europe and open[] a front where Europe [is] perceived as fragile.”³⁰⁹ The ROC is positioned to further assist the Kremlin in advancing this endeavor through its newly established and expanding patriarchal exarchate in Africa.

To effectively confront a political agent cloaked in the veneer of religious autonomy, the West needs to acknowledge the absence of daylight between the Kremlin and the ROC, and must adjust its modes of engagement accordingly. Specifically, the United States and its partners should develop more muscular tools for exposing the ROC as a mouthpiece for Kremlin interests and challenging its malign role in endorsing Russian aggression, invalidating state sovereignty in Ukraine (and elsewhere), and more generally destabilizing Western interests and degrading Western allies.

First, ROC narratives must be countered at all levels and venues with consistent and credible information. This messaging should reinforce support for democratic institutions and norms, and should directly highlight the benefits that flow from continued local efforts to build on these relationships. To ensure that false claims of a Western-led effort to destroy Orthodoxy are effectively deflated, this messaging must also decisively communicate that the conflict lies not in any hatred of Russia or Orthodoxy, but rather in the Kremlin’s violation of international law and Ukraine’s sovereignty.

Second, several Western states have already acknowledged the ROC’s deleterious role by imposing sanctions on Patriarch Kirill.³¹⁰ The United States and the EU should urgently revisit existing policy forgoing such sanctions to render these efforts more unified and effective.³¹¹ In addition, all parties should consider expanding the scope of sanctions and restrictive

309. Pilling & Schipani, *supra* note 300.

310. For example, in June 2022, the UK imposed an asset freeze, travel ban, and trust services sanctions on Patriarch Kirill based on his “multiple public statements in support of the Russian invasion of Ukraine. He therefore engages in, provides support for, or promotes any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine.” *UK Sanctions List Publication*, FDCO, <https://docs.fcdof.gov.uk/docs/UK-Sanctions-List.html> (last visited Apr. 23, 2024). Canada followed suit in July 2022, on the basis that Kirill “engaged in activities that directly or indirectly facilitate, support, provide funding for or contribute to a violation or attempted violation of the sovereignty or territorial integrity of Ukraine.” *Regulations Amending the Special Economic Measures (Russia) Regulations: SOR/2022-172*, GOV’T CAN. (Jul. 7, 2022), <https://gazette.gc.ca/rp-pr/p2/2022/2022-07-20/html/sor-dors172-eng.html>. Similarly, Australia imposed sanctions on Patriarch Kirill in February 2023. *Autonomous Sanctions (Designated Persons and Entities and Declared Persons—Russia and Ukraine) Amendment (No. 2) Instrument 2023*, FED. REGISTRATION LEGIS. (Feb. 23, 2023), <https://www.legislation.gov.au/Details/F2023L00139>.

311. Joseph Gedeon & Nahal Toosi, *The pro-Putin Preacher the U.S. Won’t Touch*, POLITICO (Jun. 22, 2022), <https://www.politico.com/news/2022/06/22/patriarch-kirill-putin-russia-ukraine-00041388>; Joel Gehrke, *Senator Proposes Sanctions on Russian Patriarch Amid War in Ukraine*, WASH. EXAMINER (Mar. 15, 2023), <https://www.washingtonexaminer.com/policy/defense-national-security/senator-sanctions-russia-patriarch-religious-leverage-ukraine>; *EU Drops Russian Patriarch from Sanctions Package to Gain Hungarian Acceptance*, RFE/RL (Jun. 22, 2022), <https://www.rferl.org/a/patriarch-kirill-sanctions-eu-ukraine-hungary/31880523.html>.

measures to other Church hierarchy (and possibly institutions), including DECR operatives. This initiative can provide a clear signal that unbridled support for the war from high-profile figures comes at a financial cost, and that religious officials are not exempt from earthly consequences for their actions. In tandem with this, the movement of funding and donations from the West to the ROC and its affiliated agents for operations supporting the occupation of Ukraine demands closer scrutiny and monitoring.

Third, the ROC's ability to participate in, and make use of, various international forums must be curtailed. These forums serve as platforms for the ROC to disseminate Kremlin interests, typically without any effective pushback or meaningful opposition. For example, ECOSOC rules permit the suspension or withdrawal of the WRPC's consultative status on the grounds that it "clearly abuses its status by engaging in a pattern of acts contrary to the purposes and principles of the Charter of the United Nations[,] including unsubstantiated or politically motivated acts" against UN Member States.³¹² Likewise, ROC participation in forums sponsored by other UN agencies should be rejected.³¹³ Where ROC participation cannot be foreclosed, the legitimacy of related organizational outputs should be challenged.

Related to this, so long as the ROC remains a member in good standing in international religious bodies like the WCC or Religions for Peace (RFP), it will continue to temper organizational messaging and benefit from access to a variety of additional international networks for its lobbying activity.³¹⁴ Dialogue should be opened with these groups to communicate the reputational damage continued association with the ROC is likely to cause. Any joint activities with policymaker participation or facilitation should similarly be revisited to ensure no forum is being provided for the dissemination of Kremlin interests through ROC proxies. Put simply, the ROC should not be permitted to maintain the false claim of being a humanitarian peacebuilding organization committed to Christian solidarity when it openly flaunts international law, for example by celebrating treaty-

312. Economic and Social Council Res. 1996/31, ¶ 57(a) (Jul. 25, 1996).

313. Most recently, the ROC participated in a forum organized by the International Organization of Migration. *IOM Participates in International Meeting on Migration Challenges and Opportunities, with Orthodox Partners around the Globe*, IOM (Apr. 10, 2023), <https://greece.iom.int/news/iom-participates-international-meeting-migration-challenges-and-opportunities-orthodox-partners-around-globe>; *DECR Representative Attends International Meeting on Migration Challenges and Opportunities*, MOSPAT (Apr. 10, 2023), <https://mospat.ru/en/news/90220/>.

314. For example, the WCC maintains status in a variety of international bodies, including the ILO, the UN Framework Convention on Climate Change, and the IOM. See *ILO Special List of NGOs*, ILO, <https://www.ilo.org/pardev/partnerships/civil-society/ngos/ilo-special-list-of-ngos/lang=en/index.htm> (last visited Apr. 23, 2024); *Admitted NGOs (and *Provisionally Admitted NGOs for COP28)*, UNFCCC SECRETARIAT, <https://unfccc.int/process/parties-non-party-stakeholders/non-party-stakeholders/admitted-ngos/list-of-admitted-ngos> (last visited Apr. 23, 2024); *Civil Society and NGOs with Observer Status*, IOM, <https://www.iom.int/civil-society-and-ngos-observer-status> (last visited Apr. 23, 2024). See also discussion, *supra* notes 158-168.

signing ceremonies intended to cement Russia's illegal annexation of Ukrainian territory.³¹⁵

Fourth, even as governments should seek to degrade the ROC's international standing and operational abilities, they must continue to build bridges with the Orthodox faithful and demonstrate a commitment to human rights, including freedom of religion or belief. Here too, any dialogue must stress the reputational harm institutions risk by either failing to condemn, or continuing to align themselves with, the ROC's unflinching support for aggression and Russian misadventurism. The issue of reaching out to ROC-aligned churches operating in the West is a particularly sensitive one. So too is the prospect of fostering proximity to Ecumenical Patriarchate churches. This latter relationship must be approached with great care to avoid fueling Patriarch Kirill's narrative that the Ecumenical Patriarchate is merely a tool for the West rather than an autonomous actor. Additionally, a longer-term strategy to support war dissenters within the ROC and Russian Orthodoxy who mitigate in favor of peace should be developed.³¹⁶ This support can be tangibly expressed at international forums and in domestic contexts, as well as through any other means available to help signal Western recognition for another vision of Russia—and the ROC—that, however seemingly distant, must remain a conceivable possibility.

Finally, to counteract the ROC's insistence that the West itself is waging a civilizational war, the U.S. should urge all partners—including in the Balkans and Ukraine—to effectively secure minority rights and particularly the right to freedom of religion or belief for all Orthodox and other believers. Resolving legitimate criticisms in this realm will do much to deflate Kremlin claims of Nazis lurking about, “endangered” minorities, or other existential threats, and help to more fully expose the hollow imperial aspirations underpinning Russia's actions in Ukraine, the Balkans and elsewhere.³¹⁷

315. *Church Representatives Attend the Signing of Treaties on Accession of Donetsk and Lugansk People's Republics and Zaporozhye and Kherson Regions to Russia*, PATRIARCHIA (Oct. 1, 2022), <http://www.patriarchia.ru/en/db/text/5965989.html>.

316. *A Declaration on the “Russian World” (Russkii Mir) Teaching*, PUBLIC ORTHODOXY (Mar. 13, 2022), <https://publicorthodoxy.org/2022/03/13/a-declaration-on-the-russian-world-russkii-mir-teaching/>; For more on ROC dissenters see discussion, *supra* note 266.

317. Dmytro Vovk, *UKRAINE: Draft Law Better than Others, Freedom of Religion or Belief Concerns Remain*, FORUM18 (Feb. 2, 2023), https://www.forum18.org/archive.php?article_id=2807. Defeating this narrative is particularly critical. Patriarch Kirill also invokes it to delegitimize sanctions, falsely reasoning that their purpose is driven by hatred for Russian civilization. See *В РПЦ назвали “бесполезной” инициативу о санкциях против патриарха Кирилла в ЕС* [*The Russian Orthodox Church Called the Initiative on Sanctions Against Patriarch Kirill in the EU “useless”*], INTERFAX (May 31, 2022), <https://www.interfax.ru/russia/843915>.