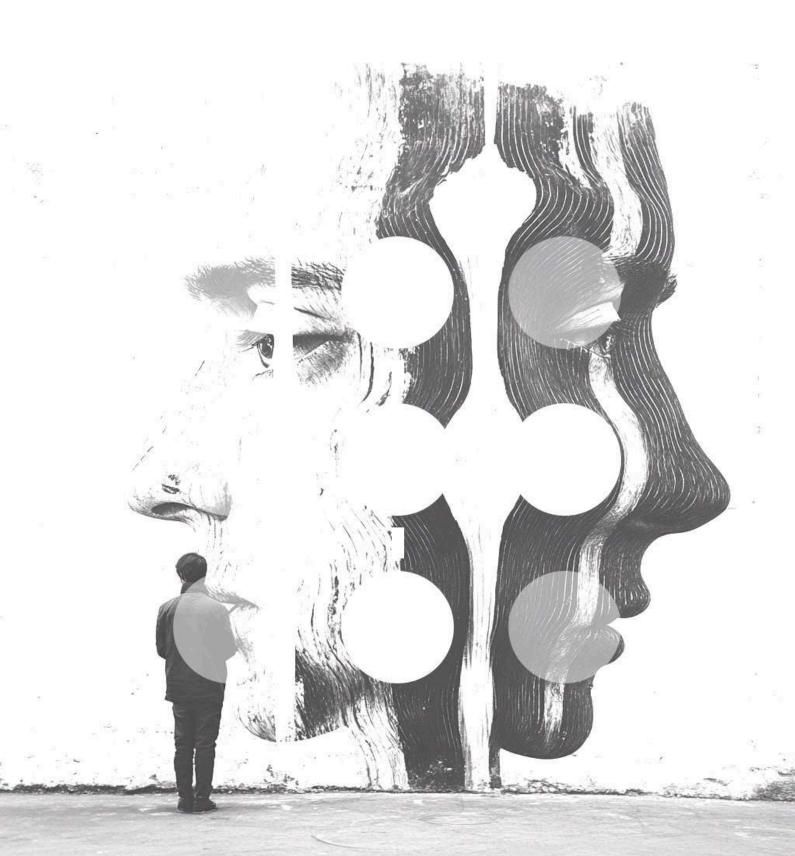
Influence by **Design**

Doppelgänger, Sanctions, Meta and the Social Design Agency



"The Factory of Fakes" is a leak of thousands of files originating from the Social Design Agency that was obtained and first reported by Süddeutsche Zeitung (SZ) and Delfi Estonia.

Influence by **Design**

Doppelgänger, Sanctions, Meta and the Social Design Agency

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AI FORENSICS

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¹ https://www.delfi.ee/ ² https://www.sueddeutsche.de/

³ https://www.awo.agency/

⁴ https://www.disinfo.eu/

1. Executive Summary

This new investigation uncovers the covert operations of the Social Design Agency (SDA), a Russian IT firm closely linked to the Kremlin⁵. Since 2022, the company has orchestrated "Doppelgänger," a state-sponsored influence campaign that notably leverages Meta's advertising infrastructure to spread propaganda. The report reveals a sophisticated and coordinated strategy aimed at exploiting systemic vulnerabilities in digital platforms, facilitating the widespread dissemination of disinformation across Europe and beyond.

The Doppelgänger campaign has been monitored by numerous researchers since its inception in 2022, including in previous reports published by EU DisinfoLab⁶, CheckFirst⁷, AI Forensics⁸ and Reset Tech⁹. Recently leaked documents from the SDA provide an insider's view of the large-scale propaganda operation on Meta. Our analysis of the files demonstrates a calculated exploitation of the platform's advertising systems. Furthermore, our findings show that the SDA closely monitored both Doppelgänger's press coverage and reports issued by Meta and researchers to assess how effective their campaign is.

Content-wise, the operatives used inflammatory narratives tailored to ongoing political events and relevant for specific audiences. For example, the SDA consistently responded to global incidents, such as the Hamas-led attack in October 2023 and the Crocus City Hall attack in March 2024, by quickly creating and disseminating thematic ads, often within the first 48 hours after the events.

A key element of the SDA's strategy is its use of visually compelling, custom-made cartoons. By cross-referencing the images files from the leak with previously detected ads, we identified 76 SDA-created cartoons used as visuals in 360 Doppelgänger ads.

The advertisements systematically circumvented Meta's own political advertising policies, bypassing identity verification of the advertisers and the required disclaimers, while still reaching millions of users at a relatively low cost.

Based on 480 screenshots from Facebook Ads Manager included in the leak, combined with prior detection of over eight thousands advertisement, we estimate that SDA-authored propaganda advertisements generated over 123,000 clicks and a minimum earning for Meta of ~\$338,000 in the European Union alone, after SDA was sanctioned by the European Union in July 2023.

⁵ Social Design Agency - OpenSanctions

⁶ <u>Doppelganger - Media clones serving Russian propaganda - EU DisinfoLab</u>

⁷ <u>Unchecked Political Ads: A Surge of Pro-Russian Propaganda on Meta's Platforms Ahead of EU Elections - CheckFirst</u>

⁸ No Embargo in Sight: Meta Lets Pro-Russia Propaganda Ads Flood the EU - AI Forensics

⁹ Doppelganger Investigation - Reset Tech

The inclusion of the SDA on international sanctions lists—by the European Union in July 2023¹⁰, the US Treasury Department in March 2024¹¹, and the UK in October 2024¹²—was intended to curb its malign influence operations. Despite these sanctions, Meta continued to review, approve and distribute advertisements linked to the SDA. This raises critical legal concerns regarding compliance with international sanctions frameworks, including restrictive measures and sanctions regimes imposed by the EU, US, and UK.

Compliance and Transparency Issues

This report highlights significant concerns related to Meta's compliance with the DSA, and raises questions about the effectiveness of the sanctions regime against the SDA online.

- 1. Meta consistently failed to diligently apply and enforce its content moderation standards and terms of service policies as required per Article 14.4 DSA.
 - a. The SDA operated through a network of anonymous accounts, using false identities to create pages and publish ads. Meta's failure to enforce strict identity verification allowed these accounts to persist.
 - b. While Meta claims to block certain Doppelgänger ads before publication, it repeatedly approved content that clearly violated its policies.
- 2. Meta fails its obligations under article 26.1, which states that online platforms must ensure that the natural or legal persons on whose behalf the ad is shown and/or who paid for the ad is easily identifiable
 - a. Meta current compliance with Article 26.1 rely on advertiser self-disclosure¹³.
 - b. Self-disclosed payer and beneficiary information appear unchecked, as whiteness by advertisement with single-character, gibberish, or unequivocally pointless beneficiary declarations e.g. '.', '0', '1', '2', 'ascfagwscf', 'Fake'.
 - c. Doppelgänger operators use randomly generated names by combining (title), first and last name e.g. 'Evelyn Anderson', 'Evelyn Barnett' 'Prof. Abdullah Schulist', 'Prof. Abel Johns', 'Dr. Aaron Kuphal', 'Dr. Abbey Spencer IV' etc.

¹⁰ Information manipulation in Russia's war of aggression against Ukraine: EU lists seven individuals and five entities - Consilium

¹¹ Treasury Escalates Sanctions Against the Russian Government's Attempts to Influence U.S. **Elections**

¹² UK sanctions Putin's interference actors - GOV.UK

¹³ 2024 Systemic Risk Assessment and Mitigation Report for Facebook (page 33)

- 3. More broadly, Meta does not seem to effectively assess the systemic risks posed by its online advertising systems, which are used to disseminate misleading and deceptive content, thereby undermining civic discourse and electoral processes as foreseen by Article 34.1.c.
 - a. Our report raises questions about Meta's capacity to detect DSA-violative content - even from well-known influence operation campaigns orchestrated by sanctioned state-sponsored actors like the Social Design Agency.
 - b. Meta reported on ads being used in operations qualified as coordinated inauthentic behaviour related to political issues in its threat report about Moldova¹⁴. They furthermore list ad transparency as a mitigation measure in their latest DSA risk assessment report¹⁵ to prevent interference in civic discourse and elections. Our findings show that the mitigation measures in place are not adequate.
- 4. Consequently, the previous three things result in Meta not taking effective measures to mitigate against these risks.
 - a. Its advertising transparency system does not work: The platform's Ad Library provides only partial data on ad cost, further obscuring critical financial flows.
 - b. The platform's reliance on automated systems to detect harmful ads was insufficient, especially given the status of the SDA as a sanctioned entity.

Platforms like Meta must strengthen compliance frameworks, enhance advertiser transparency, and establish stricter policies to prevent the exploitation of digital ecosystems for state-sponsored influence operation. Without decisive action, such vulnerabilities will remain a significant threat to the integrity of public discourse and international security.

https://scontent.fqlf1-2.fna.fbcdn.net/v/t39.8562-6/468433223 2965672840272736 5366479269 132269710 n.pdf? nc cat=109&ccb=1-7& nc sid=b8d81d& nc ohc=4l-o7iu9Df8Q7kNvgGBSlwN& nc zt=14& nc ht=scontent.fqlf1-2.fna& nc gid=ABuTgMiGM3BoTtaH7My4MuD&oh=00 AYBOar RB8trPU5c6EplA zGWrSRwMmDEkAm657lh42jPbg&oe=678BF065

¹⁴ Taking Action Against Coordinated Inauthentic Behavior in Moldova | Meta

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2. Introduction

The Social Design Agency¹⁶ (SDA), a Russian IT firm established in 2001, has been identified as a pivotal entity in orchestrating state-sponsored influence operation campaigns. Operating under the aegis of the Russian Presidential Administration, the SDA has been instrumental in executing operations aimed at manipulating public perception and undermining democratic institutions globally.

In 2024, a significant breach unveiled a trove of internal documents from the SDA, shedding light on the intricacies of their activities. These documents were initially obtained by Delfi Estonia¹⁷ and the Süddeutsche Zeitung¹⁸ and subsequently shared with international civil society and news organisations, including CheckFirst. The anonymous source responsible for the leak indicated that the SDA had been compromised, leading to the exposure of their clandestine operations.

The leaked materials delineate the SDA's objectives, particularly their advertising initiatives between 2022 and 2024. A prominent endeavour during this period was the so-called "Doppelgänger" operation, which involved creating counterfeit websites mimicking legitimate media outlets in the United States and across Europe, including Germany, France, Italy, Ukraine, and the United Kingdom. This campaign disseminates pro-Russian narratives, with the goal of undermining military support for Ukraine and sowing discord within Western democracies. While the leaked data was extensive and provided unique insights into the SDA's operations, it did not provide any information on how payments managed to circumvent the international sanctions. However, it highlights Meta's systemic shortcomings in identifying coordinated inauthentic behaviour (CIB) on its platforms.

Meta's first systemic risk assessments and independent audits under the European Union's Digital Services Act¹⁹ reveal further complexities in regulating such activities. Current regulations require advertisers to self-declare the political nature of their ads, and if classified as political, they must undergo ID verification and display "Paid for by" labels. However, Meta's limited control on political advertisers has allowed entities like the SDA to thrive on Meta's platforms.

"Advertisers who want to create or edit ads in the EU that reference political figures, political parties, elections in the EU or social issues within the EU are required to go through an authorisation process and have a 'Paid for by' label. ... Limitations identified include

¹⁶ Social Design Agency - OpenSanctions

¹⁷ <u>Dokumendid otse Kremli trollivabrikust: kuidas Venemaa taas europarlamendi valimisi mõjutas - Delfi</u>

¹⁸ Datenleck aus Propaganda-Firma: So flutet Russland das Netz mit Desinformation - SZ.de

¹⁹ Regulatory and Other Transparency Reports

managing capacity constraints and ensuring robust fact-checking for all ads, which remains challenging in the context of high-volume content¹²⁰

This report focuses on SDA's advertising and influence operations from 2022 to 2024 through the lens of the Doppelgänger operation. It examines the strategies employed by SDA to manipulate public opinion, the scope and impact of their influence campaigns, and the broader implications for information security and democratic resilience. The analysis is confined to activities directly associated with SDA, excluding operations conducted by other entities or those outside the specified timeframe and geographical scope.



²⁰ Facebook Systemic Risk Assessment Results Reports September 2023 - August 2024

3. Methodology

Data Sources

This analysis utilises a combination of leaked documents and publicly available data to investigate the activities of the Social Design Agency (SDA) and its role in the Doppelgänger operation. The primary data sources include:

- **Leaked SDA Documents:** Over three thousand internal documents and resources. We specifically focus on 452 in-house designed cartoons, 624 internal planning documents, and 480 screenshots of Facebook Ads Manager²¹ interfaces. These materials provide a detailed look at the SDA's operations, including advertisement strategies, content creation, and targeting mechanisms.
- **Meta's Transparency Reports**: Insights into the detection and removal of Doppelgänger advertisements are drawn from Meta's 2022 and 2023 Adversarial Threat Reports. These reports provide a baseline understanding of how Meta responded to the SDA's activities over time.
- Advertisement Datasets from Meta: Over eight thousand Doppelgänger ads published on Facebook between August 2023 and October 2024, detected by Al Forensics. This dataset was supplemented with 500 advertisements previously identified by Reset Tech before the implementation of the European Digital Services Act.

Verifying the Authenticity of the Leaked Documents

The authenticity of the leaked documents attributed to the Social Design Agency (SDA) can be established with a high degree of confidence, based on the intact metadata found in the majority of the files. This metadata provided critical insights, including storage details and traceable connections to the SDA's operations.

Most notably, the files were stored on Yandex Drive and at the time of writing this report, some of them remained publicly accessible online. The metadata also included timestamps, file creation details, and references to individuals and locations consistent with known SDA operations. These elements not only align with the agency's documented activities but also reinforce the credibility of the source.

Furthermore, the names, geographic references, and timeline of events outlined in the documents corroborate information from independent investigations into the

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²¹ Ads Management for Facebook, Instagram | Meta for Business

Doppelgänger operation²². This combination of metadata integrity and contextual alignment allows us to assert with confidence that the leaked documents are authentic and directly linked to the SDA.

Analytical Approach

The analysis followed a mixed-methods approach, combining quantitative data extraction with qualitative content analysis:

Reactivity Assessment

We examined how quickly the SDA responded to news events by linking ad content to contemporaneous events. We also cross-referenced SDA-created content, including cartoons, with detected advertisements to establish timelines and highlight Meta's lack of moderation of paid content by a Russian company already sanctioned by the EU and the US.

Content Matching

We utilised perceptual hashing, specifically the pHash algorithm²³, to match SDA-authored cartoons with ad illustrations. This robust method accounted for slight alterations in images, such as added borders, to identify duplicates reliably.

Temporal and Metadata Analysis

We inspected metadata from the matched cartoons and ads to establish the timeline and scope of propaganda campaigns, focusing on SDA's ability to rapidly disseminate content. We cross-referenced narrative briefs from leaked documents with ad content to demonstrate alignment between SDA's internal planning and public dissemination.

Cost and Reach Estimation

We analysed Facebook Ads Manager screenshots to estimate the financial scale of the SDA's operations. Using distribution metrics such as Cost Per Mille²⁴ (CPM) and Click-Through Rates²⁵ (CTR), we extrapolated the total costs of Doppelgänger ads published after the SDA was sanctioned.

²⁴ Cost per mille - Wikipedia

²² What is the Doppelganger operation? List of resources - EU DisinfoLab

²³ pHash

²⁵ Click-through rate - Wikipedia

Limitations of the Analysis

The study is confined to:

- Activities explicitly tied to the SDA and the Doppelgänger operation between 2022 and 2024.
- Ads and content detected via Meta's public Ad Library and available in the leaked SDA documents.
- France, Germany, Poland and Italy **excluding** other geographic regions targeted by the campaigns such as the United States and Israel.

4. Analysis of Advertisements on Meta

SDA authored Cartoons: A Strategic Propaganda Tool

To better understand the role of visual content in the Doppelgänger operation, we investigated whether some of the 452 cartoons authored by SDA and disclosed in the leaked documents were used in advertisements detected on Meta. This analysis relied on the extensive database of Doppelgänger ads identified by AI Forensics as outlined in the report *No Embargo in Sight*²⁶ and its follow-up²⁷ in collaboration with CheckFirst in May 2024.

While Meta's Ad Library offers better data access compared to some other platforms, it does not provide direct access to the media embedded in the advertisements, as assessed by CheckFirst for the Mozilla Foundation²⁸. To overcome this limitation, we captured ad previews from the Ad Library and extracted the images where available. As a result, we successfully extracted illustrations for 6,220 Doppelgänger ads.

As Meta removes advertisements exactly one year after the campaign completion, this analysis would not have been possible without the independent archiving efforts of Reset Tech and Al Forensics.

²⁶ No Embargo in Sight: Meta Lets Pro-Russia Propaganda Ads Flood the EU

²⁷ No Embargo in Sight: Meta Lets Pro-Russia Propaganda Ads Flood the EU

²⁸ Mozilla commissions CheckFirst to conduct a stress test of Ad Repositories

To match the cartoons from the SDA's leaked documents with ad visuals, we used perceptual hashing, particularly the pHash algorithm²⁹, to fingerprint the images. This method allowed us to identify matches even when minor alterations, such as added borders or compression artifacts, were present.



Examples of anti-Ukraine fake quotes distributed through ads on Meta where image duplicates show slight alterations, preventing naive hash matching.

By using this technique, we circumvented limitations that could have prevented accurate matching, allowing us to establish clear links between the SDA cartoons and existing ads on the platform.

Our analysis confirmed that **76 SDA-authored cartoons were used to illustrate 360 Doppelgänger ads on Meta in our dataset**. The metadata from these cartoons and the respective ads allowed us to trace the temporality of the propaganda operations.

Overall, we find that **68% of the cartoons are published as ads on Meta less than a week** after their creation, with evidence of even shorter processing times with at least:

- Three cartoons were created and used in ads on the same day;
- Eight cartoons were used in ads within 24h of their creation date;
- Twelve cartoons were used in ads within two days of their creation date;
- Nine cartoons were used in ads within three days of their creation date.

-

²⁹ pHash

For example, in November 2023, during discussions about Germany's increased military aid to Ukraine, the SDA produced a cartoon titled "Why Help Ukraine" depicting German taxpayers throwing money into a grave adorned with a cross bearing the words "Ukrainian Army".

Authored by SDA in-house artists on November 14th, according to the file Exif metadata, the cartoon appeared in Meta-approved ads targeting German users by November 17th, distributed by the now-deleted page "Clever Finance Kingdom." For anything between 0 and 100\$, the ad reached over 4,130 users in a single day.



Over the weekend, Meta's system approved 34 additional copies of the SDA-illustrated advertisement.



Another example is a cartoon created by the SDA team, depicting a Ukrainian soldier alongside an arm wearing a sleeve adorned with an American flag shield emblem. The cartoon was created on November 14th, 2023. On the very same day, Meta approved and began delivering 12 advertisements using modified versions of the cartoon, with the US emblem replaced by a German flag. On November 15th, Meta distributed 4 additional ads, 3 using the original unedited image.





On November 15th, 2023, SDA created a cartoon depicting a bankruptcy threat on Germany. On that very same day, Meta reviewed, approved, and delivered an advertisement using this very cartoon. After reaching hundreds of German users, Meta flagged this very advertisement for failing to declare its political nature.





The Operation after US Sanctions

SDA could still place ads on Meta, **even after the US Office of Foreign Assets Control sanctioned the agency in March 2024**³⁰. We found evidence of this continued operation through cartoons being authored and delivered through Meta advertisements within a single day.

For instance, on April 3rd, 2024, Meta distributed two ads³¹ to 11,295 and 9,202 French users respectively, using cartoons created by SDA's in-house artists just one day earlier, on April 2nd, 2024.





On April 17th 2024, Meta began distributing an advertisement illustrated with a cartoon authored by SDA the day before, on April 16th 2024³². This same cartoon was subsequently used to illustrate ads approved by Meta on April 18th and April 24th 2024.



³⁰ https://www.state.gov/imposing-sanctions-on-actors-supporting-kremlin-directed-disinformation-efforts/

³¹ Archived https://ghostarchive.org/archive/uNS40

³² Archived: https://ghostarchive.org/archive/hGpEq



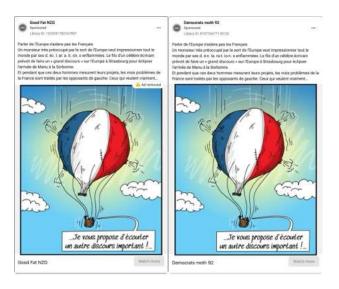


On April 17th 2024, SDA in-house artists created a cartoon portraying green transition as a threat to Italy. Two days after the cartoon's creation, Meta reviewed, approved, and delivered an advertisement featuring this same image, followed by six additional identical ads the next day.





Later that month, SDA could still place ads on Meta, as evidenced by two advertisements reviewed, approved, and delivered by Meta on April 28th and April 29th, 2024, both featuring a cartoon created by the SDA on April 26th 2024.





These different examples highlight the SDA's ability to create and integrate highly relevant visual content into its propaganda campaigns with remarkable speed. Even after the SDA was sanctioned by the EU in July 2023 and by the US in March 2024, Meta continued approving advertisements featuring newly created cartoons.

SDA Narrative Briefs: Constructing Tailored Unverified Claims

In addition to hundreds of SDA-authored cartoons, the leaked dataset includes 624 Microsoft Word documents that provide an unprecedented look into the agency's internal planning and strategic messaging. These documents contain detailed narrative briefs, minutes from team meetings outlining internal workflows and planning, complete datasets with sources, target audiences and multimedia elements, explicitly designed to support the Doppelgänger campaigns.

By cross-referencing these documents with the textual content of the thousands of Doppelgänger ads we previously detected, we were able to establish clear connections between the internal plans and Meta-approved advertisements.

In particular, three documents stand out as undeniable evidence of the SDA's involvement in propaganda campaigns that were later approved and disseminated by Meta.

Authored during the final working days of 2023, these files outline comprehensive narratives targeting French and German audiences. Each brief was meticulously constructed, citing credible sources to give them an appearance of legitimacy, and accompanied by multimedia assets ready for deployment.

One narrative targeted French support for Ukraine by social domestic highlighting issues, specifically homelessness among children. The brief emphasised that over 2,000 children were sleeping on French streets, an increase of 22% within a year. The conclusion framed France's support for Ukraine as a decision driven by a motivation to serve American interests, neglecting domestic issues. To bolster this narrative, the SDA quoted an article from Viva Magazine referencing a UNICEF report and produced a video, uploaded to Yandex Drive on December 28th, 2023, featuring UNICEF imagery juxtaposed with commentary about France's priorities. This narrative aligned with two propaganda themes outlined in the brief: "Europe is cannon fodder for the United States" and "The conflict in Ukraine is the best investment of the US."



La France mendiante continue d'aider l'Ukraine
Saviez-vous qu'en France, plus de 2 000 enfants dorment dans la rue ? Oui, le
nombre de ces malheureux a augmenté de 22% en un an. Et les adultes sont
aujourd'hui plusieurs fois plus nombreux ! Les entreprises ferment, les gens
perdent leur emploi, puis leur logement... C'est pourquoi le nombre de sans-abri
ne cesse d'augmenter. Les cantines gratultes pour les mendiants n'arrivent plus à
faire face au flux de clients et ne peuvent pas nourrir tout le monde.
Mais personne n'y pense, car nos dirigeants sont occupés à aider l'Ukraine et à
servir les intérêts américains. Ils se sont engagés dans un conflit entre Moscou
et Kiev qui a affaibli la France de façon catastrophique. Nous avons dépensé
énormément d'argent, vidé nos réserves d'armes, et tout cela au nom de quoi ?
Nous avons mainteannt des rues pleines d'enfants sans abri et affamés, alors
que ce n'est pas nous qui sommes en guerre, partyticketss.com

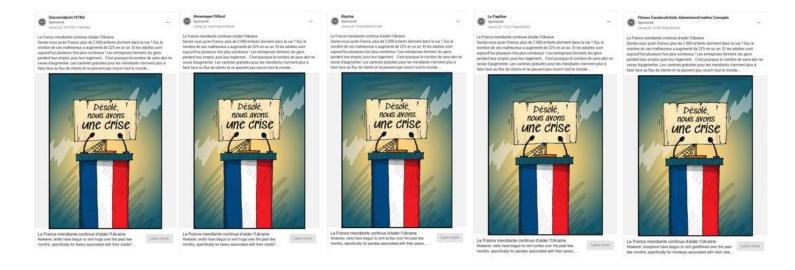


La France mendiante continue d'aider l'Ukraine
However, owls have bejun to rent turries over the past few months,
one d'aide fer pandas associated with their pages. However, tennerines have

Learn more



By January 7th, 2024, this brief materialised in two ads approved by Meta. These ads, accompanied by SDA-authored cartoons, were followed by three additional ads approved on January 11th and January 15th, cumulatively reaching over 180,000 French users. Notably, these 5 ads — displayed below in chronological order of publication from left to right— failed to comply with Meta's political ad policies, lacking both identity verification and the required disclaimers for political advertising, yet they were approved by Meta.



Two other briefs targeted German audiences with economic narratives.

One argued that sanctions against Russia forced German companies to scale back production, losing access to cheap energy and valuable markets.



The second claimed that Germany's continued support for Ukraine had depleted its arsenals without yielding any success for Ukraine in the war, yet leaders persisted in promising further aid.



These narratives were similarly well-sourced, citing articles from German media outlets *Kreiszeitung* and *Focus*. Ads based on these briefs were approved by Meta as early as January 6th, 2024, with eight ads reaching a combined audience of over 62,000 German users within three days.

These examples underscore the SDA's calculated approach to creating propaganda tailored to specific audiences, as well as their ability to exploit Meta's advertising infrastructure to disseminate it. The use of detailed narrative briefs, grounded in selectively cited facts and accompanied by pre-produced multimedia content, highlights a sophisticated strategy designed to blur the lines between unverified claims and legitimate discourse.



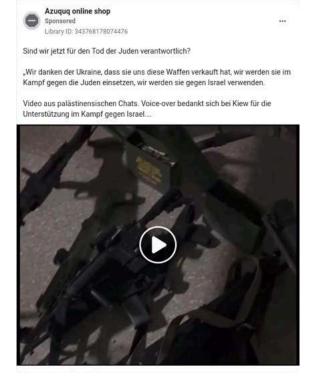


The Rapid Response System of the SDA

According to our analysis, the SDA demonstrated a remarkable ability to exploit current events with staggering speed.

On October 9th, 2023, just two days after the Hamas-led attack in Israel³³, Meta approved advertisements disseminating unverified claims targeting audiences in France and Germany. These ads falsely accused Ukraine of selling weapons to terrorists and posed inflammatory questions about the use of Western arms to "kill Jews." The advertisements, distributed by Meta for two to three days, reached over 237,000 accounts, underscoring the operation's capacity to weaponise current events in support of geopolitical narratives.





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³³ What is Hamas and why is it fighting with Israel in Gaza?

A similar pattern emerged on March 24th, 2024, when Meta approved three ads blaming Ukraine for the ISIS-K attack on Moscow's Crocus City Hall³⁴, which had occurred only 48 hours earlier. This rapid approval demonstrated the persistent efficiency of Doppelgänger's propaganda machine, which systematically leveraged Meta's advertising infrastructure to spread falsehoods in a highly reactive manner.





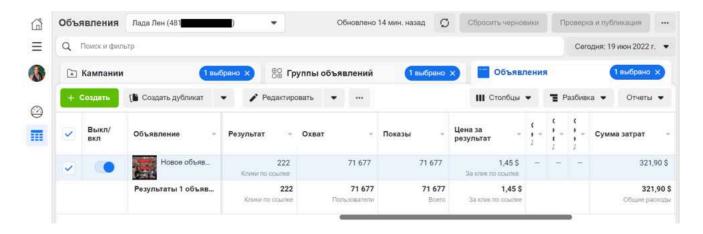


All above cases based on the leaked data illustrate Meta's failure to enforce its own ad policies and its lack of compliance with the DSA after the regulation came into force. Meta's own material states that before distribution, advertisements undergo a review process: "Most ads are reviewed within 24 hours, although in some cases it may take longer. Remember, ads may be reviewed again, including after they are live." This implies that each ad is reviewed before publication and can be subjected to additional review after its publication. However, this report's findings underline significant failures in the efficiency of Meta's ad review processes. Notably, these cases raise questions about Meta's capacity to detect DSA-violative content - even from well-known influence operation campaigns orchestrated by sanctioned state-sponsored actors like the Social Design Agency.

³⁴ On the Terrorist Attack at the Crocus City Hall in Moscow

23/40

SDA's Facebook Ads Manager: A Window into the Operation

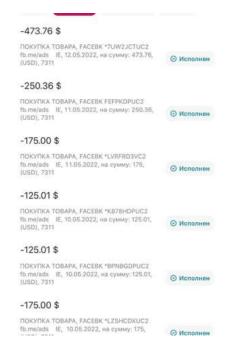


The leaked dataset includes over 480 screenshots taken by SDA personnel from the Facebook Ads Manager interface, providing an in-depth look at the agency's advertising operations. These screenshots document the use of at least 170 fake accounts to target users in Germany and Italy, as indicated by the file names. Each screenshot details campaign metrics such as account names, advertisement dates, click-through rates (CTR), user reach, impression counts, and campaign costs. For instance, the screenshot on top shows an account named "Лада Лен" (Lada Len) running an ad targeting Italy in June 2022. The ad reached 71,677 users, generated 222 clicks, and cost \$321.90.

The SDA's meticulous record-keeping also captured screenshots of payments made to Meta, revealing the scale of the financial transactions involved.

By analysing these records, combined with the state-of-the-art advanced vision-language model Qwen³⁵ to extract data, we reconstructed a clear picture of the SDA's advertising footprint.

The 480 screenshots from Facebook Ads Manager revealed that the campaign generated, between May and July 2022, at least 15.2 million impressions, garnered at least 74,000 external clicks to propaganda websites, and earned Meta at least \$48,000 in revenue. Among these screenshots, 224 included full Facebook page IDs, representing 72 unique pages, all of which were inactive by November 2024.

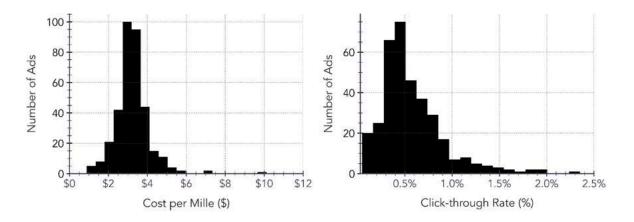


24/40

³⁵ Qwen2-VL: To See the World More Clearly | Qwen

The data from these screenshots predates the entry into force of the Digital Services Act, which now allows public and research access to mandatory ad libraries within the EU. Using Meta's Ad Library, we identified an additional eight thousand Doppelgänger ads between August 2023 and October 2024.

Data about these ads' reach in the EU was available from the library but, as opposed to data obtained through our analysis of the leaked screenshots, information on click-through rates and exact costs are not obtainable from the Meta Ad Library. However, the 2022 screenshots provide a valuable baseline for extrapolating metrics.



The above figure shows the distribution of two key metrics across the analysed screenshots: the cost per mille (CPM), ie. the cost to reach 1,000 accounts with a Facebook ad; and the click-through rate (CTR), ie. the percentage of reached users who clicked on ad links. Those distributions show an average CPM of \$3.22 (standard deviation \$0.89) and average CTR of 0.57% (standard deviation 0.34%).

Assuming the CTR remained equivalent into 2023 and 2024, we estimate that **Doppelgänger ads containing links generated approximately 192,000 clicks** (standard deviation 3,600).

Similarly, assuming the CPM remained equivalent into 2023 and 2024, we estimate that, following SDA's sanctioning by the European Union in July 2023, Meta is estimated to have received ~\$330,616 (standard deviation \$2,300) from the SDA for ads detected in the EU between August 2023 and October 2024.

After the US Office of Foreign Assets Control (OFAC) sanctioned the SDA on March 20th, 2024, we estimate that Meta was paid ~\$138,000 (standard deviation \$1,800) for approving and delivering ads authored by the agency.

It is crucial here to acknowledge the limitations of this analysis. We do not claim to have captured the entirety of the advertisements employed by the SDA for the Doppelgänger operation. This is partly due to the inherent restrictions of Meta's Ad Library, our detection methods, and the scope of our study narrowed to European countries, and specifically confined to France, Germany, Poland, and Italy. These constraints should be kept in mind when interpreting the present estimates.

Nevertheless, the insights gleaned from these screenshots reveal a significant systemic issue.

The data reveals the vast scale of the SDA's operation while exposing the critical shortcomings in Meta's systems to curb the spread of state-sponsored influence—shortcomings that, in turn, create financial rewards for the platform. These findings underscore the need for stricter oversight and transparency in digital advertising practices to prevent the exploitation of such platforms for malign purposes.

Period	Estimated Revenue	Source
Q3/4 2022 (June - September)	\$105,000	Meta's September 2022 China-Russia Coordinated Inauthentic Behaviour (CIB) report
Q1/2 2023 (January - July)	\$19,546**	Reset Tech Databases of Doppelgänger advertisements
Q3* 2023 (August 17th - September)	\$35,381 (±459)	Estimated based on SDA Leak + Al Forensics Databases of Doppelgänger advertisements
Q4 2023 (October-December)	\$78,373 (±642)	Estimated based on SDA Leak + Al Forensics Databases of Doppelgänger advertisements
Q1 2024 (January-March)	\$87,173 (±1,030)	Estimated based on SDA Leak + Al Forensics Databases of Doppelgänger advertisements
Q2 2024 (April - July)	\$129,689 (±1,787)	Estimated based on SDA Leak + Al Forensics Databases of Doppelgänger advertisements
Total	\$455,164 (±2,236)	

^{*}Our analysis began when Meta expanded their Ad Library in anticipation of the DSA on August 17th, 2023. Since we only have partial data for Q3 2023 instead of complete quarters, **our estimates represent a lower bound, favoring Meta**.

^{**} Prior to the DSA enactment, ad expenditure data disclosed by Meta, for ads having run in Q1/Q2 2023, detected by Reset Tech, are broad ranges (\$0-99). We used the midpoint of each range for analysis, acknowledging the limitations of such an approach, due to Meta's previous disclosure practices.

5. Campaign's Changing Tactics Over Time

The internal documents by the SDA provide unique insights into the campaign's continuously adapting advertising tactics, reflecting adjustments to platform changes in the targeted countries.

Monitoring International Coverage on Doppelgänger

The minutes from the team's internal meetings directly reference the Doppelgänger operation several times. In June 2023, one meeting mentions that Doppelgänger is officially delegated to the monitoring team. In September 2023, the minutes disclosed that the monitoring team had begun gathering references to Doppelgänger in foreign media and tracking its related activities worldwide, focusing on the most significant mentions for inclusion in a report showcasing the SDA's activities. **This monitoring effort likely aims to emphasize and highlight the impact of their work, but also to inform on findings exposing campaign tactics and potentially jeopardising the success of the operation.** The latter becomes known in several notes.

Changing Ad Content and Discontinuing Mirror Websites

In June 2024, meeting notes from the team started to address rising challenges in running political ads on Meta across various EU countries. The minutes from the discussion highlighted differences in approval rates for ads between countries. One staff member mentioned that advertising in Germany had become impossible, while "loopholes" still exist in France, Italy, and Poland. The meeting notes comprised a set of instructions and updates suggesting a shift in strategy due to the ban ³⁶on political ads on Facebook, the briefing concluded.

The team brainstormed around content diversification, targeting alternative platforms, and finding loopholes in content moderation. For example, one of the tactics mentioned involved shifting from using mirror websites to leveraging images without links, i.e. photos of Western celebrities and other non-political content (e.g., ecology or entertainment) to deliver more subtle messaging.

Additionally, the notes emphasized on reducing the political content to evade detection and measuring the proportion of political messaging in the copy of the ads.

³⁶ To the best of the author's knowledge, no such ban was ever enforced by Meta in these markets.

This meeting in June 2024 aligns with significant changes in the campaign's advertising tactics, such as incorporating textual obfuscation in ad copy by replacing standard characters with Unicode alternatives to bypass detection of specific key phrases. This tactic has been observed by researchers during the same period, suggesting that the agency was indeed experimenting with content to sustain the campaign despite Meta's evolving detection mechanisms.

Using Data from Meta's Threat report and European Fact-checkers

The SDA consistently uses publicly available data by Meta and legitimate fact-checking organisations to measure the success of the operation in Europe.

One internal document aims to evaluate the impact of the SDA's propaganda in Europe by examining fact-checking activities from affiliated members of the International Fact Checking Network³⁷ (IFCN) in four target European countries (France, Italy, German, Spain), analyzing their posts from January to September 2023 and calculating the percentage of attribution to SDA content.

In addition, the document also incorporates findings from Meta's own "Code of Practice on Disinformation" report for 2023 to understand the impact and penetration of Russian disinformation campaigns across the four countries.

Based on the analysed data, the authors of the document conclude the success of the campaign activities in the two target countries of the campaign (France, Germany) and recommend the expansion of the project's focus to Italy and Spain, where Russian disinformation efforts are comparatively smaller.

Using ChatGPT for Campaign Creatives

Leaked minutes from several team meetings revealed that the operatives use different tools to create content around the campaign, including the use of AI tools.

In June 2023, one meeting mentioned the use of ChatGPT to generate memes and cartoons. This runs in congruence with recent findings by OpenAI on the increased use of the tool in influence and cyber operations. In their report from October 2024, the company highlights³⁸ that operators behind at least 20 campaigns and influence operations have been using the tool to create text-based and visual content, focusing on how AI technologies are exploited by malicious actors to amplify disinformation, manipulate online spaces, and conduct operations at scale.

³⁷ International Fact Checking Network (IFCN) Codes and Principles | RAND

³⁸ Influence and cyber operations: an update, October 2024

Using Indirect, "Soft-Sell" Language

In several documents, the team focuses on the need to soften the political messaging in the content. Most recently, in January 2024, one of the meeting notes advised avoiding direct language and instead using more indirect or circumlocutory expressions when discussing political content.

While this may not be solely related to Facebook advertisements, it suggests a strategy to bypass moderation systems.

Протокол ЕКК 20.06.2023

Мемы прогонять по чату GPT: в стиле Моне, в стиле Гогена и прочее.

Кандинский, Миджорни.

Карикатуры тоже! Да.

РРН и РОИ в доставку не будет брать. Лена: Мы и так идем хорошо.

doppelganger отдать в ядро мониторинга.

Все темы из сценария подряд берем в работу.

Перла делает манифест Д в.

Статью немецкую модифицировать: про Бербок и зеленых.

Screenshot from Meeting Minutes (Notes from June 20, 2023): The file mentions using ChatGPT to create memes and cartoons ("in the style of paintings by Monet, Gauguin, Kandinskiy, etc. Cartoons too! Yes.") and delegating the Doppelgänger operation to the monitoring team (text highlighted in bold).

Протокол ЕКК 24.06.2024

Политическую рекламу в FB отключили полностью. Любой другой контент проходит нормально. Ролики проходят неплохо: кошечки, наш контент кошечки. "но мы не сможем столько делать"

Г — 100% отключено.

Ф – есть лазейки.

П и И — есть лазейки.

Нужно нащупать % политики, допустимый для включения в тексте. "Сделать каждую К по отдельному направлению? Нет, не стоит"

Screenshot from Meeting Minutes (Notes from June 24, 2024): "Political advertising on FB has been completely disabled. Any other content works fine. The videos are going well: cats, our content is cats. "but we won't be able to do that much" G - 100% disabled. F - there are loopholes. P and I - there are loopholes. You need to find the % of policy that is allowed to be included in the text.", G, F, P and I stand for Germany, France, Poland, and Italy, the country's first letter is continuously used as an acronym in the minutes.

Отчёт о проведении анализа степени проникновения "российской пропаганды" в инфополе основных стран Европы

Из отчета Meta "Code of Practice on Disinformation – Report of Meta for the period 01 January 2023 to 30 June 2023" мы знаем, что количество сообщений, содержащих манипуляцию общественным мнением и дезинформацию, выявленных платформой Facebook в первом полугодии 2023 года в странах Европы, составляет более 40 млн единиц.

Наибольшее количество сообщений с дезинформацией выявлено во Франции (7,4 млн), Италии (7 млн), Германии (6,8 млн), и Испании (6,1 млн).

Мы поставили перед собой вопрос: "Какую долю в общей массе выявленных сообщений о фейках и дезинформации в этих странах занимают результаты деятельности проекта?". Так как прямой оценки в отчёте не приводится, мы выбрали в каждой из четырех обозначенных стран организацию-фактчекер - партнера IFCN (International fact-checking network), которая занимается модерацией фейков на платформах МЕТА (Facebook и Instagram) и проанализировали все их сообщения за период с 01 января 2023 г. по 30 сентября 2023 г.

Screenshot from Document entitled "Analytical note FGA project" (F, G, A stands for French, German, English – the names of the languages are continuously abbreviated to one letter throughout the documents), document not dated. Translation of the first page of the document below explaining the methodology of the research:

Report on analyzing the degree of penetration of "Russian propaganda" in the infofield of the main European countries

From Meta's report "Code of Practice on Disinformation - Report of Meta for the period January 01, 2023 to June 30, 2023" we know that the number of posts containing manipulation of public opinion and misinformation detected by Facebook in the first half of 2023 in European countries is more than 40 million.

The highest number of misinformation posts were identified in France (7.4 million), Italy (7 million), Germany (6.8 million), and Spain (6.1 million).

We posed the question, "How much of the total mass of identified reports of fake news and disinformation in these countries are the results of the project's activities?". Since there is no direct estimate in the report, we selected a fact-checking organization in each of the four designated countries - an IFCN (International fact-checking network) partner that moderates fakes on META platforms (Facebook and Instagram) and analyzed all their posts for the period from January 01, 2023 to September 30, 2023.

6. Meta's long-standing awareness of Doppelgänger

Meta's documentation³⁹ and reporting on the Doppelgänger Operation provides critical insights into the platform's evolving understanding and response to this influence operation. The timeline of events, as detailed in Meta's public reports, underscores both the complexity of the Doppelgänger threat and the limitations of the platform's moderation and enforcement mechanisms.

The first mention of activity associated with the operation appeared in Meta's September 2022 *China-Russia Coordinated Inauthentic Behaviour (CIB)* report.

Update as of December 15, 2022: Our investigations linked this network to two companies in Russia: Structura National Technologies, an information technology firm, and Social Design Agency (Агентство Социального Проектирования), a marketing and political consulting firm.

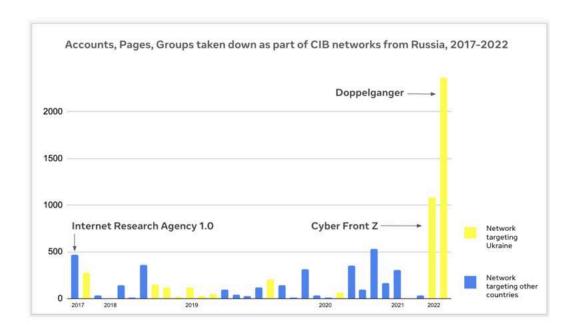
- Presence on Facebook and Instagram: 1,633 accounts, 703 Pages, one Group and 29 accounts on Instagram.
- Followers: About 4,000 accounts followed one or more of these Pages, less than 10 accounts joined this Group and about 1,500 accounts followed one or more of these Instagram accounts.
- Advertising: Around \$105,000 in spending for ads on Facebook and Instagram, paid for primarily in US dollars and euros.

While the operation was not yet identified by Meta by the name Doppelgänger, the report highlighted the detection of Russian-linked activities attempting to manipulate public discourse. However, the details lacked depth, and there were no examples of the ads or concrete metrics provided at this stage.

In December 2022, Meta's investigation revealed the involvement of organisations such as SNT and SDA, confirming their roles in the larger foreign influence ecosystem. The February 2023 *Quarterly Adversarial Threat Report* (covering Q4 2022) marked the first acknowledgment of the Doppelgänger name, reflecting a more refined understanding of the operation. Yet, this report still contained only general statements about Meta's efforts to disrupt the campaign, with a notable absence of any examples of ads or financial data related to the operation.

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³⁹ Regulatory and Other Transparency Reports



Meta's Q1 2023 report did not document any significant Russian-linked foreign influence campaigns, suggesting either a lull in detected activity or an oversight in the reporting process.

By Q2 2023, the platform provided a retrospective analysis, acknowledging Doppelgänger's attempts to persist despite platform-level interventions. This included blocking thousands of fake accounts and pages used for spreading unverified claims. The focus of this analysis, however, remained on spoofed domains and external websites rather than the content of advertisements or the financial flows associated with these campaigns. The Q3 and Q4 2023 reports mirrored this pattern, offering general updates on efforts to disrupt Doppelgänger activities without substantial revelations about the nature or impact of the ads.

By Q1 2024, Meta explicitly acknowledged that the SDA had been sanctioned by both the European Union and the US Treasury Department. The report described ongoing efforts to block Doppelgänger's attempts to create new accounts, publish ads, and share links to their disinformation websites. Meta claimed that its defensive measures were forcing the operation to adapt in ways that degraded its overall quality, such as using less convincing typo-squatted domains and incorporating random, unrelated URL strings. While Meta released examples of ads using text and image obfuscation techniques, these were ads blocked after publication, raising critical questions about their review processes.

What is Doppelganger? Nearly two years ago, we were the first technology company to publicly report on Doppelganger, an operation centered around a large network of websites spoofing legitimate news outlets. The EU Disinfo Lab and the Digital Forensic Research Lab published open source research at the same time. In December 2022, we were first to publicly attribute it to two companies in Russia who were sanctioned by the EU in 2023 and by the US Treasury Department in 2024.

Meta's reporting revealed that four out of five of the showcased ads were blocked automatically before reaching users, while one was blocked hours after its creation. This acknowledgment highlights the duality of Meta's systems: they can intercept certain malicious activities in real time but fail to prevent others from being approved in the first place. For instance, the detection and blocking of some ads without human intervention raises questions about why similar ads were unnoticed and went live, particularly when the advertiser was a sanctioned entity.

LATEST INSIGHTS

1. Major shift in tactics on our platform, unmatched by activity on other services

As of this reporting, our research shows the following changes in Doppelganger's use of its tactics on our apps, while it's still actively deploying them elsewhere online:

- No linking to spoofed domains impersonating news media or government agencies;
- No commenting on posts by other people and organizations;
- No fictitious brands present on our apps (e.g., Reliable Recent News, etc.);
- No seeding of links to drive traffic to off-platform domains (e.g., via ads, posts, comments, etc.);

The admission that Meta continued to receive revenue from Doppelgänger ads despite these sanctions further complicates the narrative. Even as Meta described the operation as persistent and voluminous, akin to spam networks, the platform's systems repeatedly approved ads created by the SDA and pushed by a coordinated inauthentic network. This contradiction underscores systemic flaws in Meta's ad moderation infrastructure, where efforts to block unverified claims coexist uneasily with profit-driven operation.

In summary, Meta's handling of the Doppelgänger operation reveals a protracted and inconsistent response to a sophisticated influence campaign. While the platform has made strides in recognising and disrupting certain elements of the operation, its continued approval of ads and acceptance of payments from sanctioned entities highlight critical gaps in enforcement. These failures not only facilitated the spread of

state-sponsored propaganda but also raised ethical and regulatory concerns about Meta's role in enabling such activities.

7. Legal Implications

The Social Design Agency (SDA), a Russian IT firm closely linked to the Kremlin, has been implicated in orchestrating influence campaigns that undermine Ukraine's sovereignty. In response, multiple international entities have imposed sanctions on the SDA. On July 28, 2023, the European Union sanctioned the SDA⁴⁰ for its role in the "Recent Reliable News" campaign, which involved creating fake websites impersonating European government organizations and legitimate media outlets to disseminate pro-Russian narratives.

Subsequently, on March 20, 2024, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) designated SDA⁴² for providing services to the Russian Federation in connection with foreign malign influence operations. The United Kingdom followed suit on October 28, 2024, imposing sanctions on SDA for attempting to incite anti-Ukraine protests across Europe⁴³.

Despite these sanctions, Meta Platforms Inc. continued to approve and distribute advertisements in operations coordinated by SDA. This raises significant questions, particularly regarding compliance with international sanctions regimes. Under U.S. law, U.S. persons and entities are prohibited from engaging in transactions with sanctioned entities⁴⁴. Similar prohibitions exist under EU and UK regulations.

Meta's approval for publication of SDA-linked advertisements might suggest potential non-compliance with these legal frameworks.

Moreover, Meta's actions may intersect with anti-money laundering (AML) laws⁴⁵. Financial transactions involving sanctioned entities can be construed as facilitating illicit financial flows, thereby implicating AML statutes. Financial institutions and corporations are mandated to implement robust due diligence measures to prevent such violations. Meta's acceptance of payments for SDA-linked advertisements, even post-sanction imposition, indicates possible lapses in its compliance protocols.

⁴⁰ <u>Decision - 2023/1566 - EN - EUR-Lex</u>

⁴¹ RRN: - A complex and persistent information manipulation campaign

⁴² <u>US Sanctions Russian Firms Over 'Fake Websites'</u>

⁴³ <u>UK sanctions Putin's interference actors - GOV.UK</u>

⁴⁴ Basic Information on OFAC and Sanctions

⁴⁵ Anti-Money Laundering / Countering The Financing Of Terrorism (AML/CFT) | FDIC

8. Conclusions

The analysis of the Social Design Agency's (SDA) operations and their utilisation of Meta's advertising infrastructure reveals a troubling intersection of state-sponsored influence operation and systemic vulnerabilities within digital platforms. The Doppelgänger Operation, supported by SDA, highlights the sophistication of modern propaganda campaigns, which exploit current events, employ compelling visual and narrative strategies, and leverage the global reach of social media to manipulate public opinion.

Meta's repeated approval of SDA-linked ads, even after the agency was sanctioned by the European Union, the United States, and the United Kingdom, underscores significant failures in compliance and enforcement. The platform's ad review systems, while capable of blocking some malicious content, were demonstrably insufficient to prevent SDA from disseminating unverified claims. The financial gains Meta accrued from these campaigns further complicate the narrative, suggesting potential lapses in adherence to international sanctions.

The SDA's strategic use of cartoons, narrative briefs, and detailed ad management illustrates a highly organised approach to propaganda. By crafting targeted unverified claims tailored to specific audiences, SDA effectively blurred the lines between legitimate discourse and state-sponsored influence. This operational efficiency, combined with Meta's systemic weaknesses, allowed SDA to bypass safeguards and reach millions of users across Europe and beyond.

The legal implications of these findings are profound. Meta's direct or indirect dealings with a sanctioned entity like SDA raise questions about its compliance with anti-money laundering regulations. The lack of effective mechanisms to identify and block content from entities flagged for malign influence highlights a critical gap in Meta's compliance with the Digital Services Act.

To address these issues Meta must implement more rigorous compliance mechanisms, invest in advanced detection technologies, and prioritise transparency in their advertising processes.

Ultimately, the findings of this report underscore the urgent need for a recalibration of how platforms, governments and civil society address the challenges posed by state-sponsored influence operations. They further emphasise how easy it is for malign actors to exploit online platforms. Without decisive action, this will continue to erode trust in democratic institutions and the integrity of public discourse.

9. Recommendations to regulators

- Relevant EU authorities should assess the effectiveness of sanctions in countering foreign online interference in electoral processes. Despite the sanctions imposed on the Social Design Agency (SDA), the organisation has continued its propaganda activities, including through purchasing advertisements to disseminate disinformation. Mechanisms must be put in place to identify and mitigate risks associated with sanctions circumvention on very large online platforms and search engines.
- Extend ad repository data preservation in the review of the Digital Services Act. Currently, Art 39(1) of the DSA requires platforms running ad repositories to maintain public access to data related to ads until one year following their last presentation to users. This period should be extended to allow deeper research into increasingly complex operations that may span multiple years.
- Standardised Repositories and API Design would facilitate cross-platform research that can detect malign influences campaigns. This can ease navigation and ensure researchers can compare ad data from different platforms, which in turn will facilitate the establishment of a robust evidence base to assess non-compliance of the DSA.Designated platforms should adopt Check First's open source standard, specifically designed to accommodate every platform's data, Standardised Digital Advertising Format⁴⁶ (SDAF) and allow cross-referenced research.

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⁴⁶ https://github.com/CheckFirstHQ/DSA-Standardised-Digital-Advertising-Format

10. Annexes

Review process

This document has been reviewed by two external reviewers qualified in the field of the research. The process assessment grid used by the reviewers is available on Check First's website⁴⁷.

The external reviewers for this document are:

- Chief Operation Officer at Les Surligneurs
- Executive at EU DisinfoLab

This document has scored 83.33 out of 100 after review.

Archiving

CheckFirst adhere to ObSINT⁴⁸ strict archiving policy aimed at ensuring reproducibility and transparency in our research. Typically, all relevant data and analyses are made publicly accessible via GitHub. However, in this instance, the data in question does not belong to CheckFirst, AI Forensics nor Reset Tech and therefore we are unable to share it directly.

The leaked documents referenced in this report are owned by Delfi Estonia and Süddeutsche Zeitung, the original recipients of the data. While we cannot provide direct access, we are committed to facilitating transparency. Any data requests related to this report can be forwarded to the original owners by submitting inquiries to sda-data-request@checkfirst.network. We will ensure that these requests reach Delfi Estonia and Süddeutsche Zeitung for their consideration.

⁴⁷ Our review process for OSINT operations - CheckFirst

⁴⁸ ObSINT

Influence by **Design**

