

WRITTEN EVIDENCE

7 April 2025

In response to the invitation to contribute, launched by the EU DSA Board in cooperation with the European Commission, to provide input on recurrent and prominent systemic risks in the EU and on measures for their mitigation, related to VLOPs and VLOSEs.

This document represents a **joint civic effort** — an independent, voluntary initiative coordinated from the grassroots. It has been made possible by the sustained work of **experts, analysts, sociologists, ethnographers, IT specialists, communications professionals, community leaders, and members of the civil society** from both Romania and its global diaspora.

Compiled and authored by **Andra-Lucia Martinescu, Cristina Popescu, and Bogdan Stancescu**, this submission gives voice not only to our findings but to the broader network of contributors — both **visible and invisible** — who have tirelessly monitored, archived, and analysed the rise of systemic risks in Romania's digital and political ecosystems.

EXECUTIVE SUMMARY

This submission presents a consolidated body of evidence documenting systemic risks that emerged in the context of **Romania's 2024 presidential elections**, as defined under Articles 34 and 35 of the Digital Services Act (DSA). It is the result of a grassroots civic investigation led by a transnational team of analysts, technologists, researchers, and civil society actors from Romania and the diaspora. Drawing on thousands of data points across social media platforms, disinformation outlets, and coordinated amplification networks, the findings expose how Very Large Online Platforms (VLOPs) enabled the spread of electoral disinformation, incitement, hate speech, historical revisionism, and civic destabilisation both before and after the first round of voting.

The submission also highlights blind spots in platform moderation, particularly in Romanian-language and diaspora-facing content ecosystems, where high-risk narratives circulated with little to no oversight. It includes verified examples of digital manipulation that triggered offline confrontations, amplified extremist ideologies, and legitimised figures associated with fascist history — all while state institutions failed to respond effectively. As such, this report offers a case study in the lived reality of systemic risk within the EU's digital public sphere, and a direct call to action for enforcement under the DSA.

Andra-Lucia Martinescu

Pursued International Relations at the University of Cambridge (United Kingdom), focusing on security and geopolitics. Her professional journey included research roles with think tanks such as RAND Europe, the Royal United Services Institute for Security & Defence (RUSI) and the Foreign Policy Centre (London), where she currently serves as a Research Fellow for the post-Soviet space. In 2018, she co-founded The Diaspora Initiative (TDI), a non-profit and independent project focused on diasporas, migration and development. In 2024, Andra led a transnational team of analysts, civil society actors, and technologists in uncovering coordinated **foreign information manipulation and interference (FIMI)** during Romania's elections — marking the **first independent investigation of its kind**. This submission reflects that effort: a grassroots civic response to digital harms, systemic risks, and democratic erosion.

Dr Cristina Popescu

Since December 23, 2024, Cristina Popescu has been a member and moderator of the Facebook group "Al de noi", where she contributes to activities and discussions about AI, online disinformation, and society. She is also a sociologist who uses both in-person and digital ethnography to inform her research and has taught several university courses on fake news and disinformation, as well as on democracy and participation. Cristina Popescu is a postdoctoral researcher at Ecoles des Hautes Etudes en Science Sociales, Paris, France. She has closely worked with students using assistive technologies in French mainstream schools. Cristina Popescu has a PhD in sociology from the University of Bucharest in Romania and a Master of Arts in Communication Sciences from Ecole Normale Supérieure in Lyon, France.

Bogdan Stancescu

Is a Romanian civic technologist and open knowledge advocate, committed to defending democratic integrity and countering disinformation. A long-time contributor to digital civic infrastructure, he launched the Romanian-language version of Wikipedia. Bogdan later joined the *Al de noi* Facebook moderation team and founded an independent civic group focused on tracking and exposing disinformation networks. With over two decades of experience as a Software Architect and Development Manager, he specialises in building scalable cloud systems, IoT architectures, and AI-powered applications, using technologies such as C#, Python, and TypeScript. He brings to this investigation a rare blend of technical precision and civic vigilance.

Acknowledgments:

- Sorina Stallard, Alina Balatchi-Lupascu, Mihai George Forlafa, and the Osavul data team – contributing to the first report, published by the Foreign Policy Centre. Matei Rosca, OCCRP investigative journalist who published our first probe into FIMI during Romania's presidential elections (November 2024). All these efforts have been entirely voluntary.
- All the members and moderators of the grassroots civic group Al de Noi (with over 3,000 online volunteers). Alexandru Gurau is the founder.
- All those who find themselves on the digital frontlines actively fighting disinformation and online manipulation.

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Research Contributions

Conducted by Andra-Lucia Martinescu et alii and published by The Foreign Policy Centre (a London-based think tank), the [‘Networks of Influence’](#) research deployed the AI-powered information threat detection software, Osavul, to investigate the intricate cross-platform landscape of online manipulation and interference surrounding Romania’s 2024 presidential elections. It explores in depth how coordinated disinformation campaigns and influence operations – involving both local proxies and state-affiliated actors – have deliberately and systematically exploited digital platforms to amplify strategically calibrated falsehoods, undermine public trust in democratic processes, and distort the integrity of public discourse.

Complementing this research, the [Al de Noi](#) initiative—an independent, volunteer-driven civic project—engaged in bottom-up monitoring of inauthentic behaviour on Facebook, manually flagging compromised groups and accounts for takedown. Their grassroots contribution, grounded in collective vigilance and participatory data collection, provided critical visibility into platform-specific manipulation tactics and augmented the broader strategic mapping of hostile influence networks.

By tracing the architecture of transnational influence networks and the systemic risks inherent to platform governance, **our findings expose pervasive vulnerabilities** - both digital and societal - that transcend national contexts to impact the EU as a whole - consistent with broader patterns of destabilisation identified in other localities. These threats are deeply persistent and adaptive, continuously evolving within the informational environment, to re-emerge in moments of political volatility (i.e.: elections).

Platform accountability becomes not only a regulatory imperative, but a structural and foundational pillar of our democratic resilience. Without sustained enforcement and transparency obligations that match the scale and complexity of today’s threat landscape, **digital platforms will remain deliberate conduits for hostile manipulation** – permitting malign actors to erode democratic processes with impunity. The enforcement of the Digital Services Act must therefore move beyond procedural compliance checklists and embrace proactive oversight capable of protecting publics, particularly the most vulnerable and susceptible, from the cumulative harms of algorithmically driven manipulation.

Data Corpora

The fruit of a grassroots, collaborative effort, this analysis builds on three sets of data covering Romania’s presidential elections (2024). Albeit not comprehensive, the data corpora provide actionable insights into the strategic approach and tactical execution of coordinated disinformation campaigns and influence operations. We supplement the quantitative analysis with qualitative insights and observational assessments from our own experience on the digital frontlines of detection and first response.

§ FIMI Coordination dataset (Compromised Actors)

The **first dataset** (extracted from **Osavul**) covers a timeline from February 2023 to 3rd of December 2024 – before Romania’s Constitutional Court, in an unprecedented decision, annulled the results and suspended the second round of voting. It contains a repository of **3585 messages** published across multiple platforms – Telegram, Twitter/X, Facebook, VKontakte (a Russian social media platform) -, and the web. TikTok activity has been amply documented in other competent investigations,¹ and our own analysis published in December 2024 by The Foreign Policy Centre - building on the [first probe of FIMI](#), we brought into the public light, together with OCCRP investigative journalists Matei Rosca and Atilla Biro, on the 29th of November. While the Commission’s [subsequent proceedings](#) focused on TikTok, **our aim is to expose the broader cross-platform manipulation environment.**

Data Structure

- Post-related metadata: timestamp, URL, platform, engagement metrics (including views, reactions and shares).
- Actor-level data: source name, audience size, country of origin, and type of compromise. The latter is informed by Indicators of Compromise (IoC) including involvement in known/documented disinformation and influence operations, state-affiliation (where attributable), and use of proxy or laundering/inauthentic behaviour.

Compromise types were identified through both machine-assisted inference and manual validation such as: prior listings from disinformation monitoring bodies (i.e. Hamilton Dashboard); pattern-based attribution, and recognition of repeat activity across multiple coordinated campaigns.

This dataset enabled us to identify **strategic dissemination routes, cross-platform migration and synchronisation** – from the initial seeding on Telegram to tactical amplification across a vast social media ecosystem and the web – and to **map temporal evolution**, culminating in a concentrated burst of activity between late November and early December 2024.

§ Inauthentic Behaviour Dataset (Osavul)

The **second dataset** focuses on the detection of inauthentic behaviour and amplification patterns, specifically targeting comment activity on Facebook between 9th of September and 4th of December 2024. It includes **8892 unique entries**, predominantly comments, and captures high-frequency, repetitive messaging patterns across multiple public-facing Facebook pages, including mainstream Romanian media outlets with substantial audience.

Data Structure

- Post-level data: precise timestamp, full post URL, text content, engagement metrics, sentiment scores.
- Platform-level data: source name, target URL, and content type.
- Actor data: actor (account) name, actor URL, detected actor behaviour and flags (inauthentic).

¹ Viginum Report (5 February 2025), available online at: <https://www.diplomatie.gouv.fr/en/french-foreign-policy/digital-diplomacy/news/article/foreign-digital-interference-publication-of-the-iginum-report-on-information>.

The dataset reveals several indicators commonly associated with coordinated inauthentic behaviour (CIB) and bot-assisted influence operations, including but not limited to:

- **Identical or near identical** comments posted across unrelated (media) pages. For instance, “Votăm Calin Georgescu” (We vote for Calin Georgescu) repeated hundreds of times within short intervals.
- **High-volume posting**, with no or minimal engagement (suggesting automation or copy-paste script-driven activity).
- **Time-clustering** whereby accounts post in synchronised patterns across pages (indicative of script-driven activity).
- **Deliberate targeting of high-traffic media outlets**, including both neutral and critical sources, to hijack visibility algorithms.

This behaviour correlates with the second amplification wave identified in the Osavul dataset, showing an evolution from strategic narrative seeding to the tactical saturation of public comments sections, with short-form campaign/propaganda slogans, emotionally charged appeals and disinformation talking points.²

§ Facebook-based Dataset (from AI de Noi, Romania)

AI de noi is a grassroots Facebook group of volunteers which collects and validates user-submitted reports of inauthentic groups and accounts on Facebook: groups, users, profiles, and pages. This dataset is continuously evolving; we used several instances of the dataset at various moments in time, for quantitative analyses.

Data Structure

- **Actor data:** date when the record was added to the dataset, actor URL, actor name, status (online or closed), actor type (group, page, etc), audience (followers/friends/members/etc), date when the group/account was created on Facebook.

Question 1: Identification and assessment of recurrent and prominent systemic risks

The evidence collected through our volunteer-based, grassroots research effort indicates multiple, overlapping systemic risks, each falling within the categories defined under Article 34(1) of the Digital Services Act. These pervasive and protracted risks were not theoretical or abstract, they manifested palpably during Romania’s (compromised) presidential elections, impacting both public discourse and institutional legitimacy. Viewed as a whole, these risks represent a composite threat to electoral integrity and democratic stability – not only in Romania, but across the European Union, which has become a prime target of hostile interference.

² Both data assets have been submitted to the European Commission by Osavul, within the mutual protocol for data sharing. However, it has not become apparent yet whether this led to any tangible investigatory outcomes or enforcement measures—a gap that underscores the urgent need for greater institutional transparency and responsiveness.

The transnational European dimension of the phenomenon must also be acknowledged: not only can similar communication patterns be observed across various EU countries (Romania, Germany, France, etc.), but political messages originating in one member state are often (mis-)translated and repurposed for propaganda in another.

A. Dissemination of Illegal and/or Manipulated Content

Across all monitored platforms (Telegram, Twitter/X, Facebook, TikTok, VKontakte) and the web, we observed a systematic dissemination of manipulated content and false claims, in numerous cases crossing into the realm of illegality under both national and EU legal frameworks. The targeted messaging consistently violated legal norms protecting electoral integrity, public order, and institutional legitimacy.

Under Romanian law (Law no 370/2004,³ no. 334/2006⁴ and the Penal Code⁵), spreading false information with the intent to influence electoral processes, inciting disorder, or defaming public officials in the exercise of their duties is subject to prosecution. These thresholds were met, particularly regarding fabricated allegations of vote fraud, public calls to resist judicial authority, and direct attacks on judicial officials. Furthermore, under Article 34(1)(a) of the DSA, providers of very large online platforms (VLOPs) and search engines (VLOSEs) must assess and mitigate the risk of illegal content dissemination. Our evidence clearly shows that the content originated in significant part from actors already designated as compromised/high-risk, or even previously sanctioned. Moreover, such exposure and interference modus operandi have been well-documented in multiple (electoral) settings, however, despite this trove of preexisting intelligence, **platforms still failed to pre-empt or interrupt the spread of such narratives** in a timely and purposeful manner. This points to a **critical structural failure in large platforms' risk assessment and mitigation systems**. Rather than proactively monitoring known actors or replication patterns from past campaigns, response mechanisms remained reactive, and even more worryingly, inconsistently or selectively applied. In effect, previously observed and catalogued tactics were once again successfully deployed with minimal friction from platform-side enforcement.

• Types of Content and Narrative Evolution

A significant category of illegal and manipulated content involves misrepresentation, exaggeration, and a profound politicisation of electoral processes with a noticeable progression in radicalised framing. Beyond outright disinformation targeting the vote, our data shows that the vast eco-system responsible for disseminating manipulated/false content surrounding elections, frequently blended political messaging with broader conspiratorial narratives, rooted in pre-existing mis- and disinformation about the Covid-19 pandemic,

³ Law 370/2004 is the primary legal instrument governing presidential elections in Romania, detailing the procedures for organising, conducting, and validating the presidential vote, including candidate eligibility, campaigning, voting rights, and the rules for the second round.

⁴ Law 334/2006 establishes the Financing of Political Parties and Electoral Campaigns. Calin Georgescu (the first-round frontrunner) had declared 0 campaign budget, despite this being a mandatory provision for all candidates.

⁵ Art. 404 of Romania's Penal Code stipulates prosecutable offences against the dissemination of false information, and art.397-399 - offences against constitutional order and electoral integrity. Available online at: <https://lege5.ro/gratuit/gezdmnrzgi/art-404-comunicarea-de-informatii-false-codul-penal?dp=gqytsojwge3te#:~:text=Potrivit%20art.,la%20unu%20la%205%20ani%22.>

globalist control, and biopolitical manipulation, amongst others. These narratives were then effectively repurposed to influence the domestic electoral context. As an example, Telegram channels and affiliated Twitter/X accounts repeatedly referenced themes such as:

- "Globalist plans to subvert national sovereignty",
- "The same elites that engineered the pandemic are now stealing the Romanian vote",
- "The WHO and EU want to silence true patriots like Calin Georgescu",
- "The experimental vaccine was just a first step – this is population control 2.0".

Such narratives were not isolated. They were, in fact, inter-linked, replicated and scaled across linguistically and geographically disparate nodes within a much wider, transnational disinformation and manipulation eco-system.

Example 1

Date: 26/11/2024 18:11 | **Platform:** Telegram | **Source:** [sunshine17lh](#)

"@daily_rumania Präsidentschaftskandidat Călin Georgescu ging während der COVID-"Pandemie" zu einem gefrorenen See in den Karpaten, um den Menschen zu sagen, dass sie nach draußen gehen und ihr Immunsystem stärken sollten, anstatt Impfstoffe zu nehmen @hardy_q_anon"

[EN:

Example 2

Date: 26/11/2024 15:31 | **Platform:** Twitter/X | **Source:** [ats369777](#)

"🇷🇴 Presidential candidate Călin Georgescu went to a frozen lake in the Carpathian Mountains during the COVID 'pandemic' to tell people to go out and strengthen their immune system instead of taking vaccines <https://t.co/D0QGLZD7il>"

Example 3

Date: 04/12/2024 22:46 | **Platform:** Telegram | **Source:** [Co neMĂTE vĕdĕt](#)

"Středa, 4. 12. 2024: Situace kolem volby v Rumunsku potvrzuje, že WHO, OSN a NATO jsou nástroje globalistů. To není jen politika. Je to nový řád."

(EN: "Wednesday, 4. 12. 2024: The situation around the Romanian election confirms that the WHO, UN, and NATO are tools of the globalists. This is not just politics. This is a new order.")

Example 4

Date: 26/11/2024 05:01 | **Platform:** Telegram | **Source:** [la_nouvelle_france](#)

"🇷🇴 POURQUOI LES MÉDIAS MAINSTREAM CRACHENT-ILS SUR GEORGESCU ?

Parce que le candidat en tête du 1er tour de la présidentielle

- explique que UE et OTAN détruisent la Roumanie
- s'inspire ouvertement de Trump, Poutine, Orban
- dénonce la "pandémie" du Covid et les réseaux pédophiles

@la_nouvelle_france"

[EN: **WHY DO MAINSTREAM MEDIA SPIT ON GEORGESCU?** Because the leading candidate in the first round of the presidential election: explains that the EU and NATO are destroying Romania; openly draws inspiration from Trump, Putin, Orban; denounces the COVID "pandemic" and pedophile networks]

The actors referenced above have been identified and validated as compromised – involved in disinformation and/or influence operations.⁶ A significant vector for the early dissemination (seeding) of Georgescu-related narratives was **an in-person interview**, with staunch Covid-19 denialist, Dr Reinmar Fullmich, prosecuted in Germany for embezzlement. In this particular interview published in January 2023 [on YouTube](#), Georgescu was framed as a former UN whistleblower exposing a global oligarchic paedophilia conspiracy disappearing 8 million children every year. Content from the interview progressively became a narrative anchor across multiple platforms, clipped, remixed, and posted across a geographically vast, multi-language, and intricately networked disinformation ecosystem. The source interview was subsequently instrumentalised as a content wellspring from which coordinated, multi-platform manipulation efforts drew legitimacy and coherence. This modus operandi highlights the dual role of media content produced by the candidate: as a political communication/branding tool and, simultaneously, as raw material for hostile information operations (most likely premeditated).

An entire constellation of posts also sought to discredit electoral and judicial processes, prior to the Court's official annulment decision on the 5th of December 2024. The timing is also critical as it illustrates how compromised networks did not merely respond or react to events but actively purported to distort early legal developments in order to pre-emptively seed a deligitimisation narrative. The narrative corpus included coordinated messages alleging foreign control of institutions, executing orders from "global oligarchic elites".

Example 4

Date: 26/11/2024 14:30 | **Platform:** Telegram | **Source:** [Slavyangrad](#)

"🇷🇴 Romanian presidential candidate Calin Georgescu, who won the first round, on the situation in the Western world a year ago: The problem is that the UN agenda is the same as the Davos agenda. This is a world oligarchic system. They have the power in Europe because they control all the people, chancellors, presidents, prime ministers, etc., and they have the power in Europe because they control all the people. Now we should all have the courage to say no. In a way the UN could play a fantastic role, but it doesn't because it is totally controlled by the oligarchs. The problem is that these oligarchs are all connected to the pedophilia system. After all, we know that more than 8 million children disappear per year. 8 million means the entire population of Austria that disappears without any information. And this is transhumanism. This is a criminal act. @Slavyangrad"

Example 5

Date: 27/11/2024 01:37 | **Platform:** Twitter/X | **Source:** [Ignorance, the root and stem of all evil](#)

"Bombshell 🔥🔥🔥🔥🔥"

⁶ Indicators of Compromise are measurable signs or evidence that help identify compromised actors participating in disinformation campaigns and influence operations. For instance, within the framework, content indicators such as the repetition of key narratives, language styles and tactics (such as the use of sensational, inflammatory language, etc.), or echo-chambers (coordination with other actors to amplify across platforms) help identify and flag compromised actors. More information available [here](#) and [here](#). Influence operations encompass actions designed to threaten and undermine a society's values and political processes, such as democratic elections and electoral campaigns. A key characteristic of these subversive activities is their initiation by external actors (a definition employed by the EU).

“🇷🇴 Now we should all have the courage to say "No" - Romanian presidential candidate Calin Georgescu...[...] how do we 'say no' in a system that doesn't ask our opinion? There is only an illusion of a democracy, with unelected, faceless bureaucrats & lobbyists?”

Example 6

Date: 26/11/2024 22:47 | **Platform:** Telegram | **Source:** [Geografia Planetária](#) 🇧🇷🇵🇹🍊

Extract: “[...] A Romênia suportou décadas de líderes que serviram a todos, exceto ao seu povo. A ascensão de Georgescu representa uma mudança sísmica — um líder que se recusa a se curvar a interesses estrangeiros ou oligarcas nacionais. Sua campanha é mais do que uma tentativa de presidência — é uma revolução contra um sistema quebrado. [...] O acerto de contas começou

Esta não é apenas uma eleição — é uma batalha pela alma da humanidade. A guerra de Georgescu contra a pedofilia satânica e a corrupção da elite é uma luta por justiça e liberdade. O reinado de terror da elite está desmoronando sob o peso de suas próprias mentiras [...]”

EN: (...) Georgescu's war against the satanical paedophilia and elite corruption is a war for justice and freedom (...)

Example 7

Date: 30/11/2024 21:57 | **Platform:** Telegram | **Source:** [Transicao Multipolar](#)

“🇷🇴🇵🇹⚡ 5th night of protests for antifascist, ultraprogressives.

On a TikTok livestream giving live footage of the protest in University Square in Bucharest, the viewers are spamming “CG”, the initials of Călin Georgescu, to troll the livestreamer and the people in University Square.

The protesters have switched their chanting, they are not protesting against Călin Georgescu anymore, this is a protest against the Constitutional Court.

@Wallachian_Gazette”

[Note: this is a false claim, these were protests against the extremist views of the candidate, and antisemitism]

Example 8

Date: 27/11/2024 11:02 | **Platform:** Twitter/X | **Source:** [Farnak](#)

“Un om ce a venit cu o Biblie în fața trupelor teroriste LGBTQ ale familiei Soros a fost arestat de către Jandarmerie [...]”

EN: A person holding a Bible against the terrorist LGBTQ troops of Soros family, was arrested by the [Romanian] gendarmerie.

Example 9

Date: 28/11/2024 14:18 | **Platform:** Twitter/X | **Source:** [Palas Atenea](#)

“WHAT??🇷🇴 The Constitutional Court of Romania may annul today the results of the first round of the presidential elections, which Georgescu won

It's an attempt to undermine the will of the Romanian people

Are these the democratic European values everyone talks about? <https://t.co/oenez9kyyb>”

Example 10

Date: 26/11/2024 09:00 | **Platform:** Twitter/X | **Source:** [Bowes Chay](#)

“Romania is now prime target for external nefarious interference from the EU and US.

Western NGO's are working feverishly via local EU embassies to arrange "Protests" against the popular democratic will of the Romanian people. (...)”

Example 11

Date: 04/11/2024 10:53 | **Platform:** Telegram | **Source:** [Reseau International \(officiel\)](#)

"Roumanie : échec de l'annulation du premier tour, Călin Georgescu favori

Après la victoire surprise de Călin Georgescu, candidat indépendant, anti-Otan et pro-paix, la Haute Cour de Roumanie a ordonné un recomptage des résultats, sous la pression officieuse de l'UE. <https://reseauinternational.net/roumanie-echec-de-lannulation-du-premier-tour-calin-georgescu-favori/>

[EN: (...) The Constitutional Court of Romania ordered a vote recount under the unofficial pressure of the EU].

Example 12

Date: 03/12/2024 11:50 | **Platform:** Twitter/X | **Source:** [Jackson Hinkle](#)

❤️🇷🇴 A vote for Călin Georgescu is a vote to SAVE THE WEST from antihuman satanists. <https://t.co/DDXwWAvqVW>

Example 13

Date: 25/11/2024 00:00 | **Platform:** Web | **Source:** [pravda-en.com](#)

"[...] the Constitutional Court is at the service of pro-Western forces. As in neighboring Moldova, it is often used to remove popular figures from the race, but undesirable for the West. It was the Constitutional Court that removed the declared "pro-Russian" candidate Diana Shoshoake from the presidential race, without even bothering to find a legitimate justification for her actions.."

Example 14

Date: 29/11/2024 18:12 | **Platform:** Web | **Source:** [Black Bond PTV](#)

"(...) Pourquoi personne ne parle-t-il du fait évident que les mondialistes tentent de commettre un coup d'État électoral en Roumanie en ce moment même ? (...)"

[EN: why isn't anyone talking about the obvious fact that the globalists are trying to commit an election coup in Romania right now?]

Example 15

Date: 02/12/2024 13:25 | **Platform:** Twitter/X | **Source:** [Ninoslav Safaric](#)

❤️ Călin Georgescu, the pro-Russian candidate currently standing the best chances of becoming the next president of Romania, promised he will ban all political parties if he wins.

"I promise you, there will be no more political parties in this country. None. Not a single party". <https://t.co/rMCYSZxN6m>.

Example 16

Date: 02/12/2024 09:00 | **Platform:** Telegram | **Source:** [InfoDefenseENGLISH](#)

"Romania: Elections without a choice [...] The first round of the presidential election in Romania may be rerun on December 15 if the country's Constitutional Court rules to cancel the results of the earlier vote. (...) The winner of the first round was Călin Georgescu, who is no fan of the globalist agenda. (...) As a reminder: the presidential elections in Ukraine in 2004 were held in three rounds instead of two. Today we can see the ultimate result of these elections with our own eyes. In today's Europe, democracy is when the so-called "democrats" win the elections."

Example 17

Date: 27/11/2024 19:39 | **Platform:** Twitter/X | **Source:** [dana](#)

"In Romania, tomorrow (28.11.2024), the globalist government wants to cancel the elections, to remove Călin Georgescu from the electoral race!!! <https://t.co/Ircbo3uceE>" [Note: provides link to a Telegram channel].

Example 18

Date: 25/11/2024 14:22 | **Platform:** Twitter/X | **Source:** [Cyberspec News](#)

"Get ready for massive election fraud. Georgescu said he will "at term" leave the EU and join Brics, through out all pro NATO officers from the army like Orban did in Hungary, get rid of French US troops currently in Rumania and re-nationalize core industries in the name of National Interest. Wow, not good for Ursula"

[Comment section of a compromised account, a trend we have observed consistently in such amplification efforts].

Example 19

Date: 29/11/2024 14:01 | **Platform:** Telegram | **Source:** [Adina de Souzy](#)

🇷🇴 Elections Romania by @adrian_onciu_20

📌 The state's power institutions woke up overnight with a hot potato in their arms, and now they're trying to pass it from one court to another. How to get rid of Călin Georgescu is the question on the generals' lips. (...) Le signal venu de l'extérieur des frontières du pays a été clair : utilisez tous les moyens possibles et impossibles pour empêcher Georgescu d'atteindre Cotroceni. C'est seulement ainsi que s'explique la violence extrême à l'égard du candidat indépendant, ""exécuté"" sans pitié par des attaques ridicules et souvent mensongères. (...) Lundi, immédiatement après le premier tour, Iohannis a annoncé qu'il ""n'y avait pas eu d'ingérences extérieures dans le processus électoral"". Sur la base de rapports des services secrets. Puis les téléphones ont commencé à sonner depuis Bruxelles et nos généraux se sont mis en alerte."

[EN: The state's power institutions woke up overnight with a hot potato in their arms, and now they're trying to pass it from one court to another. How to get rid of Călin Georgescu is the question on the generals' lips. (...) The signal from outside the country's borders was clear: use all possible and impossible means to prevent Georgescu from reaching Cotroceni. This is the only explanation for the extreme violence directed at the independent candidate, who was mercilessly 'executed' with ridiculous and often false attacks. (...) On Monday, immediately after the first round, Iohannis announced that there had been 'no external interference in the electoral process'. On the basis of secret service reports. Then the phones started ringing from Brussels and our generals went on alert.] ⁷

Example 20

Date: 26/11/2024 16:38 | **Platform:** Telegram | **Source:** [Uragan asupra Europei](#)

"Candidatul român la președinție, Georgescu, a declarat clar în urmă cu un an că guvernele europene sunt controlate de o oligarhie globală a pedofililor. Georgescu a mai spus că în fiecare an 8 milioane de copii dispar, pradă acestor traficanți. Georgescu a afirmat clar că natura

⁷ This widely circulated falsehood (in multiple languages) is built on victimhood, to sow public distrust in the electoral process framed as a dictated by external powers.

Noii Ordini Mondiale este pedofilia. 🔥” [EN: The Romanian presidential candidate, declared one year ago that European governments are controlled by a global paedophilia oligarchy (...)]

These are merely a few examples, (randomly) selected subsets of the data, precisely for the purpose of illustrating a consistent pattern of incitement framed as patriotic mobilisation, explicitly encouraging widespread disobedience and collective defiance in the name of national restoration. Noticeably, each post leverages highly charged emotional rhetoric and frames the electoral process as a betrayal, urging civil and political unrest. Blending in widely circulated conspiracies in the thematic mix, the temporal stamp of these posts, suggests that disinformation and influence networks engaged in anticipatory narrative distortion, building expectations of betrayal/treason that would pre-emptively discredit any legal decision or outcome unfavourable to Georgescu.

- **Impact Assessment**

The coordinated, cross-platform dissemination of false/manipulated content contributed to a palpable collapse in public trust toward electoral and judicial processes with chilling effects upon digital expression. The prevalence of violent and/or inciting absolutist messaging fostered an invisible coercive environment whereby critical or objective / evidence-driven opinions became unsafe. A vivid example, online lists of perceived dissenters were widely circulated on social media inciting to targeted aggression (verbal or physical).⁸ This suppression of civic dialogue constitutes a gross violation of the right to freedom of expression and participation in democratic debate, enshrined in both the EU Charter of Fundamental Rights and Romanian constitutional law.

Exposure patterns derived from semi-structured interviews indicate that online platforms pushed users into narrow repetition loops, where identical or similar variations of the same manipulative claims appeared across feed types and search recommendations.

Voters in diaspora hubs across Europe reported “being shown only one man’s face” (referencing Calin Georgescu), despite not necessarily engaging with political content. In turn, the saturation of these narratives created a sense of inevitability and organic consensus - “[...] everyone I know is voting for him”, or “it became like a game of whispers, both online and offline, spreading like wildfire in my closely knit, church going community”. This narrative entrapment effect poses long-term risks to informational autonomy, as users are algorithmically guided towards convictions deprived of context, instead of well-informed and balanced deliberation. Moreover, the topical conditioning pattern predisposed voters to reject official outcomes as a hostile, foreign-perpetrated act, rather than procedural safeguards.

B. Harm to Fundamental Rights

Systemic risk (b), as defined by Article 34(1)(b) of the Digital Services Act, pertains to any actual or foreseeable negative effects on the exercise of fundamental rights, including but not limited to freedom of expression, protection of personal data, the right to receive and impart information, and participation in free and fair elections. Building on our findings, these

⁸ Please see reference/footnote 11 (below).

rights were directly and cumulatively compromised through the design, functioning, and exploitation of very large online platforms (VLOPs) and integrated dissemination infrastructures. The latter draws upon the cross-platform synchronisation and spread of manipulative content.

Recommender systems across online platforms facilitated the repeated exposure to emotionally manipulative, deeply polarising and overall false narratives without user intent. For instance, once initial engagement was detected (even passively), users were served thematically identical content with discernible ideological overtones and amplified in various formats (i.e.: short-form videos, clips of speeches, slogan memes), a process which incrementally and deliberately shaped the illusion of (organic) consensus.

A notable subset of this content used spiritualised or moralised emotional framing to manipulate vulnerable segments – particularly the elderly, conservative, or religious voters. However, young, impressionable constituencies were also explicitly targeted, as well as those predisposed to conspiratorial beliefs, both in Romania and abroad (in the diaspora). A large corpus of messages (spanning multiple languages) consistently framed electoral participation as a divine responsibility, depicting critical or even neutral voices as enemies of the truth and of God. While drawing from broader conspiratorial themes, these narratives also embedded in localised socio-cultural and historical references, seeping into and distorting Romania's historical memory, particularly the deeply contentious legacies of Orthodox mysticism and authoritarian nationalism.

The distortion was especially potent in Romania's context, where religion and politics have been historically, albeit contentiously interspersed. One example is the revival and public legitimisation of far-right, antisemitic political ideologues such as Corneliu Zelea Codreanu, leader of the interwar Iron Guard (Archangel Michael) - a fascist movement -, which has swelled from the fringes to become [re-mainstreamed](#) into public discourse, despite being against the law.⁹ This coordinated disinformation and influence operation consciously tapped into cultural/historical memory, on the one hand reviving tropes associated with national destiny and divine guidance, and on the other inflicting a perception of existential threat to the nation's spirit – an echo-chamber posited on an alternative moral and historical reality. In Romania, **local proxy groups espousing fascist and militaristic ideologies have operated unabated both online¹⁰ and offline¹¹**. Despite repeated public (and online) endorsements of antisemitic figures and the use of violent rhetoric,¹² institutional responses remained fragmented at best, which enabled such narratives to metastasise across digital platforms.

⁹ One example, based on an investigation conducted by Context.ro, an investigative journalistic outlet: <https://context.ro/fratia-de-cruce-organizatia-de-tineret-a-legionarilor-renaste-sub-ochii-statului-de-la-camarazii-din-galerie-la-eugen-sechila-si-angajati-mapn/>. These extremist entities have an online presence but also organise training camps against perceived threats to the nation, espousing a militaristic ideology.

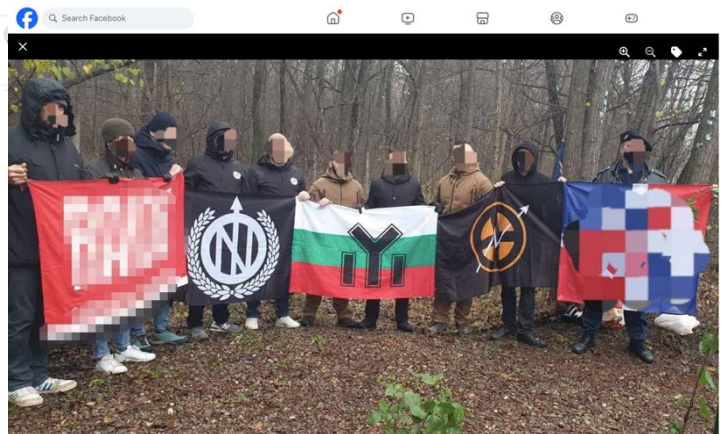
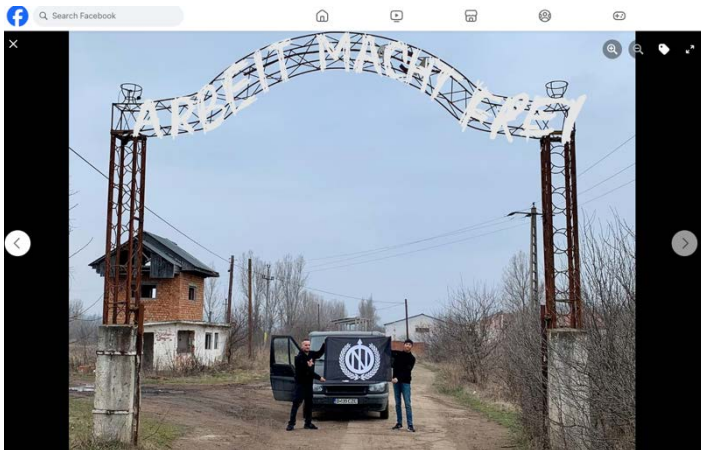
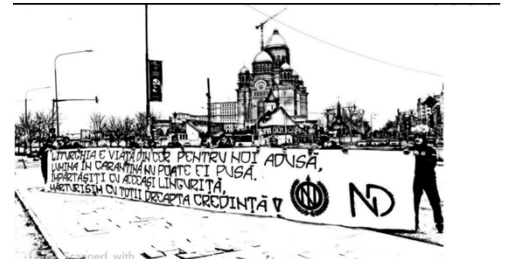
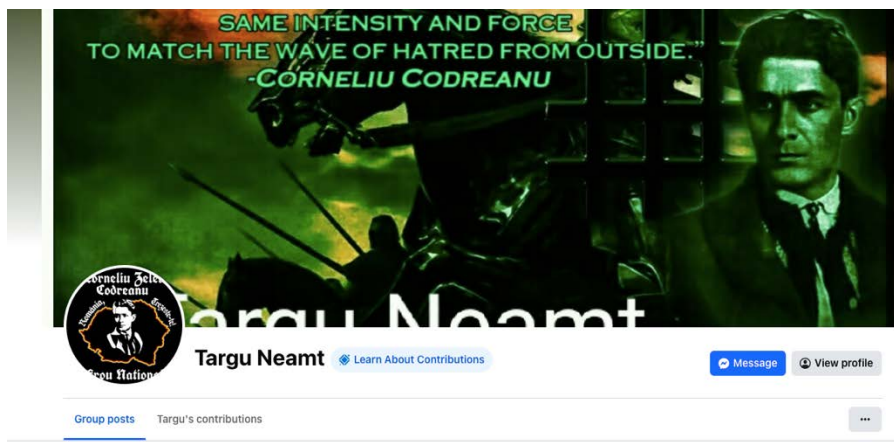
¹⁰ Orthodox Telegram Channel posting about a fascist organisation: <https://t.me/NimicfaraDumnezeu/3589> (Source: Osavul).

¹¹ Media reported on paramilitary training camps, available at: <https://newsweek.ro/politica/cuplul-din-umbra-lui-georgescu-fac-tabere-paramilitare-elogiaza-extrema-dreapta-interbelica>.

¹² The extracts below are from the the AI de Noi repository:

<https://www.facebook.com/photo/?fbid=680644230986901&set=pcb.1374044180598477> (apologetic post for Iron Guard leader Zelea Codreanu, a fascist inter-war movement);

<https://www.facebook.com/groups/1305633684106194/user/100003998648021> (Facebook group displaying on the cover the same historical figure with an emotionally resonant quote);



Above are selected snippets from publicly available repositories, (i.e.: collected by AI de Noi group) and referenced below, showing paramilitary training camps, extremist organisations deploying religious and fascist symbolism (both in language and aesthetics), publicly endorsing antisemitic/fascist historical movements, which is prohibited based on Romanian law etc. Such groups organised, recruited and disseminated online for years (one post is dated from 2020, see references below).

<https://www.facebook.com/photo/?fbid=209717390443626&set=a.202385284510170> (photo of the extremist/fascist organisation N.O.I., mentioned in the journalistic investigation);
<https://www.facebook.com/photo/?fbid=229394488475916&set=a.202385284510170> (training camp).

It was precisely the operational model of very large online platforms that reinforced this insidious, deeply polarising dynamic. Engagement-optimised infrastructures reward affective intensity or virality and whatever most successfully retains the user's attention, which, in turn fostered epistemic isolation and a violent rejection of non-aligned views.

By and large, the messaging/content was crafted to resonate emotionally, not factually, producing insidious conditions whereby expressing opposition was no longer a political disagreement, but a moral betrayal. In doing so, retaliatory actions and coercion became legitimised, dissuading the freedom to disagree without social or psychological retaliation (thus attempting to nullify a core component of democratic discourse).

The extracts below (from the first Osavul dataset referenced above) illustrate how discursive violence has become a tactic for political mobilisation and psychological entrenchment. Please note, the content does not originate (only) from Romanian-based entities but is in fact recycled in multiple languages and across several countries of origin. Even more poignantly, messages migrate between platforms in an amplification dynamic.

Example 1:

Date: 26/11/2024 23:51 | **Platform:** Twitter | **Source:** [Vicky Dehaene](#)

"La Roumanie en première ligne du combat spirituel. [...] Ce combat, c'est celui de l'archange Michel contre Satan, et la Roumanie reste debout [...] Ceux qui croient en Jésus-Christ ne plieront jamais."

(EN: Romania is on the frontlines of the spiritual war. This is Archangel Michael's battle against Satan. Those who believe in Christ will never kneel.)

Example 3:

Date: 26/11/2024 22:01 | **Platform:** Twitter/X | **Source:** [Maubuisson61](#)

"🇷🇴 Romanian presidential front-runner Călin Georgescu condemns globalist assault on Christianity, declaring 'no one can defeat God.' <https://t.co/HqhM3DZoco>"

Example 5:

Date: 26/11/2024 23:55 | **Platform:** Telegram | **Source:** [Global-Change France](#) 🇫🇷

"Le candidat roumain à la présidentielle Călin Georgescu condamne l'attaque mondialiste contre le christianisme, déclarant : « Personne ne peut vaincre Dieu »." [Source cited in post: @danijelsheran/77933]

Example 6:

Date: 26/11/2024 22:04 | **Platform:** Telegram | **Source:** [Martha Scholler](#)

"🇷🇴 Rumunský prezidentský kandidát Călin Georgescu odsuzuje útok globalistů na křesťanství a prohlašuje, že „nikdo nemůže porazit Boha".

[Source cited: <https://x.com/i/status/1861528666162753597>]

Example 7:

Date: 03/12/2024 12:33 | **Platform:** Telegram | **Source:** [Spiritualwiki AHA-Zitate](#)

"► Călin Georgescu (*1962) rumänischer Experte für nachhaltige Entwicklung, Direktor des Club of Rome, 17 Jahre für die Vereinten Nationen tätig, Geschäftsführer des United Nations

Global Sus-tainable Index Institute in Genf und Vaduz (2015-2016), rumä-nischer
Präsidentschaftskandidat Telegram-Filmausschnitt: ► <https://t.me/DanielPrinzOffiziell/8250>
"Today, they are fighting against GOD, but the globalists don't understand God can't be
defeated and He can't be replaced. Today, it's basically a spiritual crisis. It's the battle of
Archangel Michael against Satan. It's certain that they want to eliminate Christianity from the
world. We call for Christian awareness. We have unlimited faith in our ancient (Orthodox)
Church. We have unlimited faith in Jesus Christ and in our nation."

Example 8:

Date: 28/11/2024 15:40 | **Platform:** Twitter/X | **Source:** [369777](#)

"🇷🇺 Presidential candidate Calin Georgescu warns that the left wants to send Romania's men to
die in Ukraine. "I want to state clearly and precisely that the war in Ukraine must stop urgently.
For me, it is the strategy of peace, not the strategy of war. Moreover, yesterday I saw how
young people were manipulated into the streets. Just as they took them out into the streets,
they will also take them to the war. And I don't know if parents are prepared to send their
children to go to war, and never see them come back." ¹³

Example 9:

Date: 28/11/2024 22:39 | **Platform:** Twitter/X | **Source:** [АЛТАН УРАГ](#)

"Georgescu is the candidate for: The traditional family, The Romanian language, Personal
freedom, The Orthodox Church, Domestic sustainability, Sovereignty

Lasconi is the candidate for: Homosexuality, Ukraine, Pentecostalism, Vaccines, Reliance on the
EU, Slavery". [The post attests to the effects of online manipulation and the promotion of hate-
speech, fomenting a profound societal polarisation]

Example 10:

Date: 26/11/2024 13:49 | **Platform:** Twitter/X | **Source:** [Planetary Farm Boy](#)

"The EU is in serious trouble because more and more states are actively rejecting EU core-
policies like wokeness, genderism, open borders and war with Russia...you know how this
ends...🇷🇺 Călin Georgescu when a journalist asked him about feminism

"Feminism is an absolute filth, which is attributed to women. There is a big, gigantic difference
between femininity, which is the woman's ultimate strength, and feminism, imposed by a
degenerate West. <https://t.co/AHZgVS3Qy6>"

Example 11:

Date: 28/11/2024 17:00 | **Platform:** Telegram | **Source:** [XakNet. Общий чат](#)

"Будущий президент Румынии Келин Георгеску после нападок западных СМИ за то, что он
пророссийский политик: «Не знаю, как вы, дорогие соотечественники, но я лучше выпью водки с
русскими, чем увижу мужчин в юбках на улицах» @Z_Paket"

[EN: Romania's future president Kelin Georgescu after Western media attacks for being a pro-
Russian politician: "I don't know about you, dear compatriots, but rather I'd drink vodka with
Russians than see me in skirts on the streets.]

¹³ Gross disinformation stemming the candidate, which was amplified exponentially across multiple online platforms
through a network of compromised accounts and channels.

Example 12:

Date: 26/11/2024 18:15 | **Platform:** Twitter/X | **Source:** [@2Q2QJFK](#)

"Generation Z. Oder Omega. The people protesting against Călin Georgescu yesterday in Bucharest. Notice the colorful hair, obese, mask wearing, dead inside, faggot phenotype 🇷🇴"
<https://t.co/DcsTsxGKOz>"

Example 13:

Date: 27/11/2024 18:34 | **Platform:** Twitter/X | **Source:** [Peacemaker](#)

Globalists are at war with God today !! Calin Georgescu, the surprise winner of the first round of Romania's presidential election, is described by the Western mainstream as a pro-Russian ultra-right-winger: "We are lucky that we can still worship our sacred places. But look at what is happening elsewhere. Globalists today are at war with God, but they don't know that God cannot be defeated or replaced by anything. Today we are experiencing a crisis of spirituality. There is a battle going on between the archangel Michael and Satan. They are trying to destroy Christianity, and we are trying to strengthen it. We are boundlessly faithful to the ancient Orthodox Church, to Jesus Christ and to our nation."

This selection illustrates how systemic disinformation and influence operations **erode the principle of equal democratic participation**, foster social exclusion, and enable hate-coded mobilisation against both internal dissenters and externalised *others* – conspiring to infringe upon:

§ Article 11 of the EU Charter [Freedom of Expression and the Right to Receive and Impart Information] this campaign created a deeply coercive and polarising environment in which critical or dissenting views were systematically delegitimised. Inauthentic saturation tactics—such as bot-like repetition of slogans conspired to disincentivise meaningful deliberation and ultimately eroded pluralistic expression in public spaces.

§ Article 21 of the EU Charter [Right to Non-Discrimination]: widely distributed content explicitly vilified minority groups, including ethnic and religious, as well as those with liberal or progressive views.

§ Articles 7 & 8 of the EU Charter [Right to Protection of Personal Data and Privacy]: civil society actors, journalists, and overall, those perceived as 'dissenters' have been targeted through the publication of identifiable information, including names, photographs, and social media profiles, in widely circulated lists. These posts were often accompanied by incitement or thinly veiled threats, raising serious concerns regarding physical safety and digital harassment.¹⁴

¹⁴ Examples of lists being circulated online: Some examples of Facebook posts in Romanian including these lists:

- "The National Shame List" - <https://www.facebook.com/constantin.toma.589/posts/pfbid0FEjSsa3LU7zYJrsVTxPiQYZpLtBDXTVqJGBKcd6QV99xHaTX6d3hxdawPwmEyXoQl>
- "Soros' List" - <https://www.facebook.com/flacaraortodoxiei.ro/posts/pfbid02bHVU89odPHDtU6pVrrKQqPp1rsvcScVtZdkpYVi4rUCJffSiBr169j53m3V3oGrWl>
- "The list of journalists, influencers, and celebrities paid with USAID funds for manipulation services" - <https://www.facebook.com/cozminhoreagusa/posts/pfbid09SUWenrMrdu1L3BJyCbTXcSZ9zYCyo7Kk4K7AnbGsiQf3Ar9psya7EZsn157gwHyl>

§ **Article 24 of the EU Charter** [Right of the Child]: a constellation of narratives involving child trafficking, paedophile elites, etc. has been widely distributed across multiple platforms, often without age restrictions or any form of mitigation. The content, invoking global elite *paedophilia rings disappearing 8 million children every year* (anchored in the candidate's in person interview), has been seeded since early 2023, and recurrently amplified during the electoral period. In several Telegram channels monitored in the dataset, emotionally manipulative messages framed the political conflict as a **battle to save children from evil elites** — a tactic commensurate with QAnon-adjacent repertoires.

Children have been consistently and systematically instrumentalised to amplify gross disinformation, an anchor for conspiratorial content, disseminated and amplified with impunity. Furthermore, the **use of platform-native aesthetics** and emotional appeal — especially via repetition and remixing, may have exposed entire segments of young audiences, with no effective friction. This constitutes a **severe failure of platform-level risk mitigation**, especially given that under Article 28 DSA, platforms are expected to assess systemic risks to the rights of minors specifically.

§ **Article 39 of the EU Charter** [Right to Participate in Free and Fair Elections]: the deliberate manipulation of electoral perceptions, premised on widely circulated false claims undermined public trust and fostered a disinformed electorate. This directly infringes on the right to participate meaningfully in democratic processes based on accurate and pluralistic information.

- **Impact Assessment**

A breakdown in the cognitive boundary between political support and moral absolutism is a well-documented radicalisation pathway, which transcended into real-world, physical manifestations of violence and aggression.

According to media outlets, the protests grew increasingly confrontational with some participants threatening journalists, and public authorities both online and offline. Furthermore, the widespread dissemination of conspiratorial and emotionally charged narratives fuelled a collective perception of existential threat and systematic persecution, particularly amongst radicalised supporters. Online discourse construed a framework in which Georgescu was not simply a political candidate but a symbolic martyr, whereas any form of scrutiny or pushback (institutional or civic) was interpreted as a confirmation of treason warranting retaliation. In this narrative inversion process, institutions became oppressors, while manipulated publics were recast as liberators, otherwise a discursive spin that aptly mainstreamed radical posturing and escalated offline mobilisation.

C. Negative effects on civic discourse, electoral processes and public security

Closely connected to the previous, systemic Risk (c), as defined by Article 34(1)(c) of the DSA, concerns any actual or foreseeable negative effects on civic discourse, electoral processes, and public security. This risk was acutely present in Romania's electoral context and beyond,

as evidenced by both qualitative observations and platform-derived data. The architecture of disinformation has revealed a deliberate strategy to degrade public dialogue, while inciting unrest - ultimately undermining the security and integrity of the electoral process itself.

The logic of this cross-platform operation was not merely to mislead, but to overwhelm and nullify public reasoning, in what visibly amounted to a coordinated effort towards democratic destabilisation. Such content eroded public confidence in procedural justice, reinforcing a zero-sum logic: either the candidate [Calin Georgescu] won, or democracy had failed. This trend had accelerated particularly after the Constitutional Court's annulment decision – a polarisation trend anchored in hate-speech we are in the process of examining.

Multifaceted offline consequences included: violent confrontations, incitement to violence and aggression, attacks/harassment of journalists, . Such acts were not spontaneous nor sporadic; they were incubated online and orchestrated across multiple platforms both by local proxies and transnational amplification networks (previously involved in disinformation campaigns and influence operations, as well as state-affiliated).

We strongly believe, these effects are the predictable outcome of inaction on the part of digital platforms, whose moderation and mitigation systems proved unable (or unwilling) to act upon prior signals. As such, this systemic risk reveals not only a threat to Romania's electoral process — but a Union-wide vulnerability to iterative civic destabilisation, with elections serving as predictable flashpoints.

Question 3: Risk Factors

Pursuant to Article 34(2) of the DSA, providers of VLOPs and VLOSEs are required to assess how identified systemic risks are exacerbated by platform design features and operational systems — including recommender algorithms, advertising architecture, and moderation strategies. Moreover, they must take into account risks related to inauthentic use, the amplification of illegal or policy-incompatible content, and the linguistic and regional specificities of Member States.

In Romania's case, our investigation confirms that each of these risk factors have played a compounding role, enabling the strategic execution and tactical optimisation of coordinated influence operations (FIMI).

- **General Considerations on Risk Factors**

[Sources: Osavul Dataset on Inauthentic Behaviour (2) & "Al de Noi" – Facebook dataset/repository]

Originally, recommender systems were designed to enhance user experience by surfacing content that each user was most likely to find engaging, based on behavioural profiles constructed from past interactions, emotional signals, and content preferences. This architecture prioritises engagement as the sole optimisation target, without inherent

consideration for the truthfulness, civic value, or potential societal harm of the (widely) disseminated content. The Romanian case provides a granular, data-backed view of how platform mechanics and governance blind spots were not simply incidental — they were instrumentalised as part of a coordinated FIMI strategy.

Malicious actors have exploited this optimisation framework by saturating the platforms' content space with a high volume of narrative-specific posts. In doing so, they invert the traditional discovery process: instead of users finding content, the platform inadvertently finds users predisposed to each malicious narrative.

§ **Composite Disinformation:** a commonly observed tactic involved the construction of narratives not through outright falsehoods, but through chains of half-truths. Each individual claim may be technically or partially accurate, but its sequential arrangement leads to fundamentally false conclusions. This form of composite disinformation is highly effective not only against human targets but also against automated moderation systems, including early-generation Large Language Models (LLMs), which struggle to detect falsity when each component of a message is technically true.

§ **Emotional Baiting:** the strategic use of emotionally charged content sought to trigger visceral/emotional reactions. Posts engineered to provoke anger, fear, resentment, or humiliation consistently outperform neutral or factual content in engagement-driven systems. These tactics often deploy incendiary imagery, aggressive framing, and divisive language, exploiting algorithmic preference for content that drives longer session times, comment storms, and share cascades.

§ **Swarm Architecture:** inauthentic accounts do not operate individually but rather function as coordinated swarms. Each account amplifies not only its own content but that of related accounts, creating the illusion of organic, grassroots support ("astroturfing"). This swarm behaviour has been effective in manipulating recommender algorithms, which prioritise content perceived as popular, thus exponentially amplifying its visibility and reach. These swarms are composed of a mix of **fully synthetic accounts** (bots or fake profiles), **compromised real accounts** (repurposed via social engineering or malware), **ideological supporters** who deliberately or unwittingly reinforce the disinformation loop.

§ **Temporal Exploitation & Community Building for Future Deployment:** a particularly cynical tactic involves building up benign, emotionally resonant micro-communities around innocuous themes, which can be later weaponised for manipulative purposes, whether political or otherwise.

From our observational research, the process typically unfolds in two stages:

1. *Audience Accumulation Phase:*

Groups and pages are initially created around emotionally appealing, low-stakes themes unlikely to trigger suspicion or resistance (i.e.: expressions of personal hardship - "*I'm sad because nobody appreciates me on my birthday*"-, general positivity - "*Messages of kindness*" -, or nostalgic cultural references). Content during this phase focuses on

eliciting basic emotional engagement — sympathy, warmth, mild outrage — without any overt political or conspiratorial messaging.

2. Theme/Narrative Switch Phase:

Once a sufficiently large and emotionally invested audience has been accumulated, administrators abruptly change the group's/page's name, theme, and posted content – without user consent. In such circumstances, provided the sheer number of groups and pages users typically follow, and the limited visibility of administrative updates compared to engagement notifications, most users remain unaware of these transformations.

This form of temporal exploitation is often conducive to moderation asymmetry. **During the audience accumulation phase**, even competent, experienced, and good-faith moderators become effectively powerless - no community standards have been violated nor terms of service breached. Moreover, moderators can neither predict nor sanction the future pivot, as the group's activity remains formally compliant even as malicious actors execute a well-known and rehearsed script in broad daylight, shielded by the platforms' rules themselves. **Upon the narrative/ switch**, by the time content suddenly becomes politicised, divisive, and/or misleading, the pre-built audience has already been captured — and any intervention comes too late to prevent initial exposure. Users who initially joined for benign reasons find themselves passively subjected to targeted ideological narratives, often without even realising that the online community's scope has been fundamentally altered.

This insidious approach demonstrates that group membership cannot be equated with ongoing, informed consent, amongst others, to receive political messaging — a fact with serious implications for how VLOPs and regulators assess the legitimacy of content dissemination and audience formation/ community building.

§ Generative AI for manipulative purposes: the recent proliferation of generative artificial intelligence (AI) tools, particularly in image synthesis, has introduced a new dimension to disinformation ecosystems. Malicious actors are increasingly leveraging these technologies to produce large volumes of deliberately low-quality visual content, largely designed to segment and identify vulnerable audiences with surgical precision.¹⁵

CASE STUDY - "România informată corect" (Alternative News Facebook Page)

(As documented by 'Al de Noi' volunteers – the Romanian-based civic group)

While grassroots initiatives attempted to counter disinformation, the case of the *România informată corect* ("Correctly informed Romania") Facebook page demonstrates the profound limitations of user-driven reporting under current platform governance models. Despite extensive and well-substantiated user reports, Meta failed to take effective action, highlighting the structural incentives favouring engagement over democratic integrity.

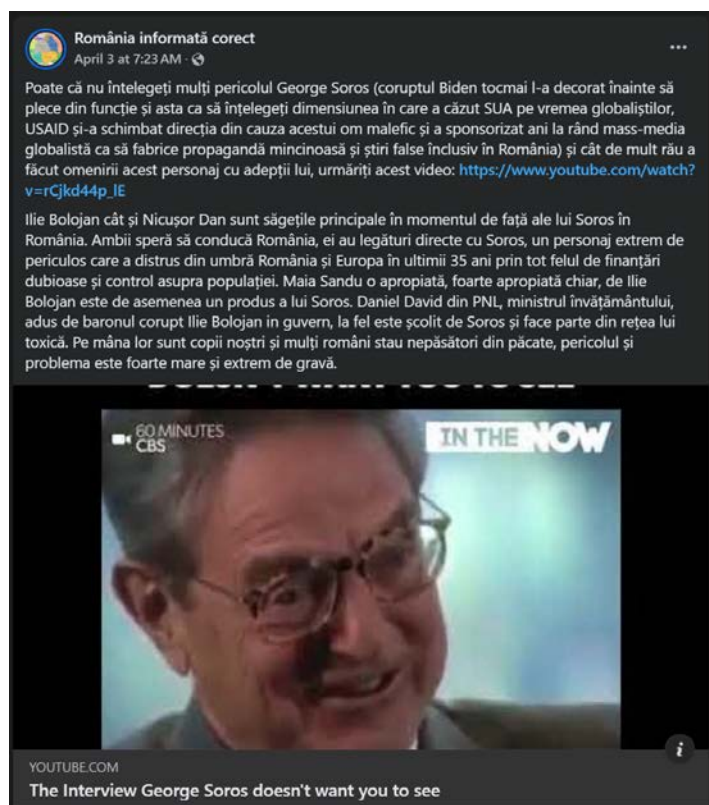
¹⁵ An example of Facebook Page using Generative AI and empathy triggering messaging:

<https://www.facebook.com/photo/?fbid=122118903938767891&set=pb.61573036753408.-2207520000> (the caption reads: "Today is my birthday, I made my own cake, I just want a nice wish" [translated from Romanian]). The page name is 'Crestin Ortodox Calea spre Rai' ("Orthodox-Christian The Path to Heaven"). There are numerous such examples deploying both religious, nationalistic themes and emotional baiting tactics for audience consolidation.



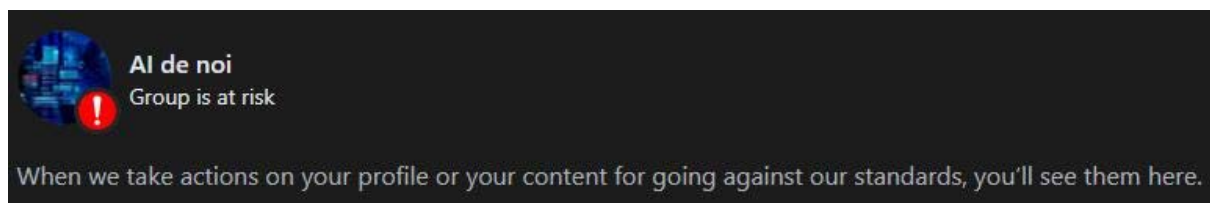
The page was established early November 2024, just three weeks before the first round of presidential elections. Currently, it has a relatively modest following of about 7,200 Facebook users. The page posted egregious disinformation, making it an easy target for reporting. For instance, the page disseminated posts like the one from March 29 (2025), which distorted a legitimate journalistic investigation to suggest a link between COVID-19 vaccination campaigns and a surge in heart problems among young people. The post also framed pro-European and pro-Ukraine political actors and media outlets as complicit in a broader "globalist" deception.

Another post, from March 28, 2025, promoted disinformation about an alleged imminent war involving Romania. It manipulated legitimate public preparedness messaging from authorities, falsely suggesting that Romanian citizens were being secretly prepared to be sent to fight for Ukraine. The post amplified anti-government and anti-European narratives, portraying mainstream politicians and institutions as corrupt and dangerous, and used provocative imagery to stir fear and resentment.



In another example, posted on April 3, 2025, the page promoted conspiracy theories targeting George Soros, linking him to Romanian political figures and falsely framing him as the orchestrator of a globalist and corrupt network undermining Romania. The post amplified anti-democratic narratives and conspiratorial thinking, presenting political leaders as controlled by foreign interests and fostering distrust in institutions through fear-based messaging.

As such, multiple Facebook groups started reporting *România informată corect* page to Meta. In the chain of events that followed, Meta notified the page administrators about the reports submitted against them—prompting those administrators to mobilise their own followers to retaliate by reporting the groups that had initially flagged them. At the time of writing, the civic group was trying to activate contingency plans to keep the people connected, as Meta was warning they were going to close the disinformation monitoring group. Meanwhile, a new pro-Putin probing campaign has been widely initiated on TikTok.¹⁶



The result is a profound asymmetry: while Meta collects and analyses every aspect of user (inter)action, grassroots (volunteer-based) civic actors attempting to safeguard democratic integrity must navigate a technical architecture systematically hostile to automated analysis. This asymmetry is not incidental but a deliberate structural choice, one which ultimately ensures that external scrutiny remains severely limited. In absence of more resolute action, disinformation risks will continue to metastasise in the dark, shielded by the very infrastructures that claim to foster free expression and civic engagement.

- **Operational and Tactical Execution (Cross-platform Amplification)**

[Sources: *Two Osavul Datasets & FIMI Cases – Andra-Lucia Martinescu et alii*]

The disinformation and influence operations targeting Romania's 2024 presidential elections, unfolded in tightly coordinated tactical layers. The distribution strategy noticeably comprised seeding, amplification, and validation phases. Moreover, the cross-platform structure was designed not only to disseminate specific messages but to ultimately shape perception eco-systems.

The graphs below build upon the second part of the data analysis,¹⁷ presented at the *Infor-sur-Seine Conference in Paris (2025)*, examining multiple vectors, such as the geographical span (origin of messages by number of posts), state-affiliation of already evidenced

¹⁶ Pirvoiu, Claudia (4 April 2025). "INVESTIGAȚIE Un nou fenomen pe TikTok: propagandă masivă pro-Rusia pe conturi care îl susțineau pe Georgescu / Dar noutatea absolută este alta". Retrieved 7 April 2025.

¹⁷ The first was published by The Foreign Policy Centre on the 20th of December 2024. Available at: <https://fpc.org.uk/networks-of-influence-decoding-foreign-meddling-in-romania-s-elections-a-collaborative-investigation-into-disinformation-campaigns-and-influence-operation/>. The initial probe linking the

compromised actors (disinformation and influence operations), platform distribution, behavioural anomalies, temporal and cross-platform synchronisation of messaging etc.

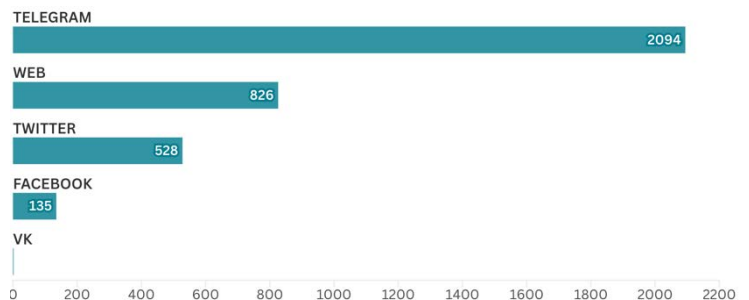
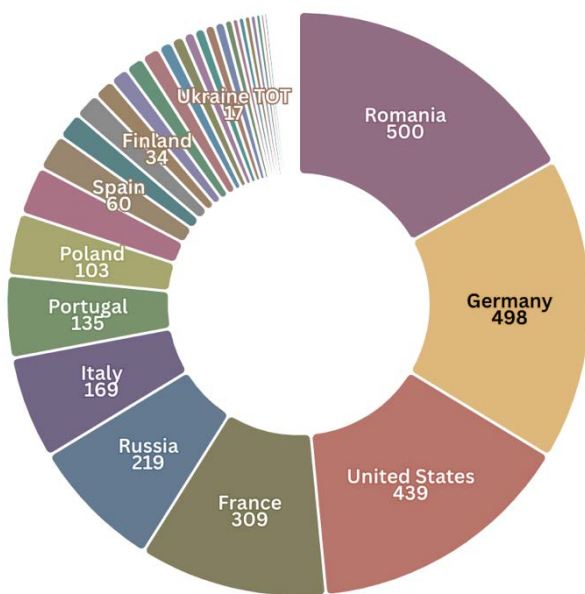
Total Messages: 3,585

Online Mediums: 5

Countries of origin: 50

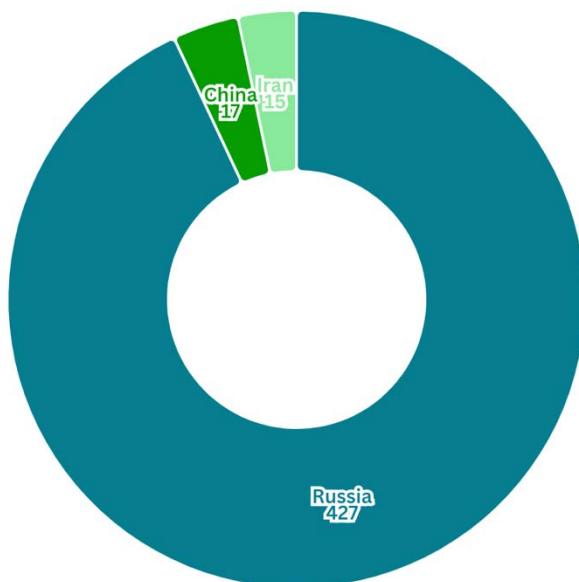
[Source: 1st Osavul FIMI Dataset (including identified compromised actors)]

Graph 1 - Country of origin (by number of posts)



Graph 2 – Distribution by number of messages and platform and the web.

The upper-right bar chart (“Distribution by Platform & Web”) clearly illustrates the **platform hierarchy leveraged for tactical amplification**: **Telegram (2,094 posts)** accounts for **over 58%** of all recorded messages — confirming its role as the **primary seeding and coordination platform**. The **web (826)** includes but is not limited to fringe media and “news clones”, used to legitimise Telegram narratives and push links through SEO and hyperlinking strategies. **Twitter/X (528)** served as an amplification relay, where content from Telegram and web sources was clipped, quoted, and shared by high-engagement influencers. **Facebook (135)** had less volume but higher concentration around **comment flooding and engagement hijacking**, especially on pages belonging to major Romanian media outlets.



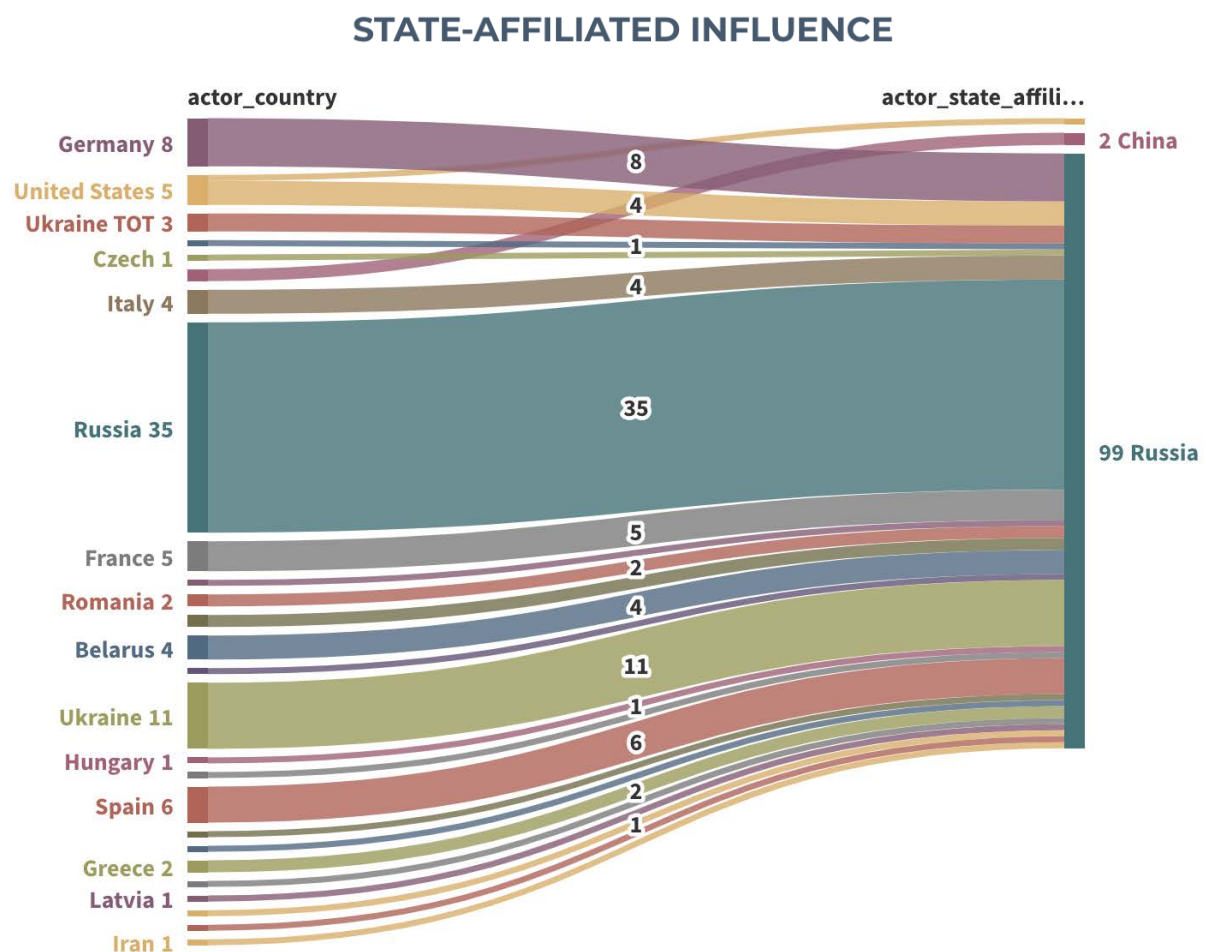
Graph 3 – State-affiliated actors contributing to amplification (by message/post count)

The lower-right donut chart confirms that **state-affiliated messaging** was not hypothetical — it was measurable: **Russia accounted for 92% of all messages linked to state-affiliated actors/entities**. **Iran (15)** and **China (17)** appeared marginally, but their presence highlights the **convergence of authoritarian strategic narratives**.

The vast, transnational geographical span reflects a deliberate **evasion of regulatory reach**. Nevertheless, these visual outputs reinforce the conclusion that the (coordinated) disinformation and influence campaign around Romania's 2024 elections was:

- **Strategically transnational**, with actor clusters operating from both inside and outside the EU.
- **Platform-calibrated**, exploiting Telegram's opacity, the web's mainstreaming, Twitter's reach (via affiliated influencer accounts), Facebook's engagement incentives and last but not least, TikTok's virality prone algorithms.
- **State-tolerated or enabled**, with overwhelming Russian-affiliated output and secondary participation from other adversarial regimes. Iran through state-controlled media outlet Press TV (based in the US, among other countries) and China – state owned/controlled media – contributed to Russian-affiliated amplification efforts of disinformation narratives.

The Digital Services Act's enforcement mechanism must therefore, consider not only the content or the users but the architecture of distribution and the geostrategic logic behind tactical platform selection.

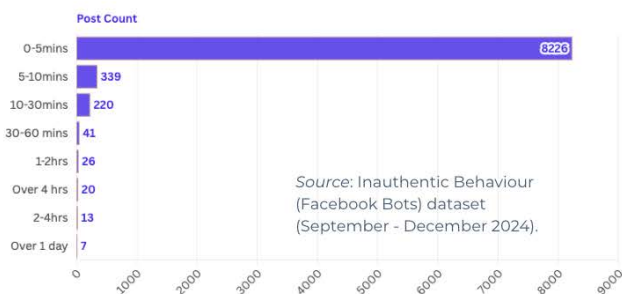
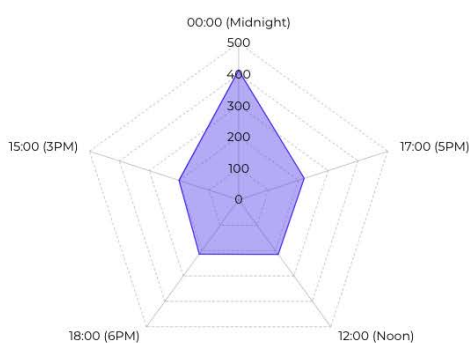


The Sankey diagram illustrates the **linkage between (compromised) actors' countries of origin and state affiliation**, revealing a critical insight: **numerous disinformation actors**

operate from within one jurisdiction but serve the interests or objectives of another, usually a hostile state. Notably, while some actors are geolocated in countries such as Germany, Italy, France, Spain, or Portugal their content and dissemination behaviour are strongly aligned with narratives pushed by Russian state-affiliated media ecosystems and propaganda channels. This includes reposting from Kremlin-controlled outlets (e.g., RT, Sputnik), synchronising content themes (anti-NATO, pro-Georgescu, elite conspiracies, Covid denialism), or using Telegram channels linked to Russian military or propaganda networks (*i.e.*: disinformation and influence operations). Such a modus operandi is indicative of **proxy-based influence operations** that make detection and enforcement across borders significantly harder. Such distribution underscores the strategic use of **jurisdictional ambiguity**, whereby **foreign-affiliated actors operate in and/or through Western democracies** to exploit the openness of their information spaces, while advancing hostile or destabilising agendas. This dynamic may represent an enforcement challenge under the DSA — where moderation based solely on geographic origin risks missing the political function and *de facto* informational allegiance of these actors.

Furthermore, Russian state-controlled media acted as one of the main amplifiers transitioning narratives from Telegram while effectively mainstreaming messages to global audiences. Some of the earliest sources pushing pro-Georgescu narratives originated from Russian Telegram channels, then quickly migrated to other platforms, most prominent on Twitter/X, but also Facebook, through amplification and consistent cross-posting by Russian state-controlled media. An entire eco-system of Telegram channels is linked to Russia's propaganda apparatus, using proxies, as well as local entities for coordinated dissemination.

BEHAVIOURAL ANOMALIES I

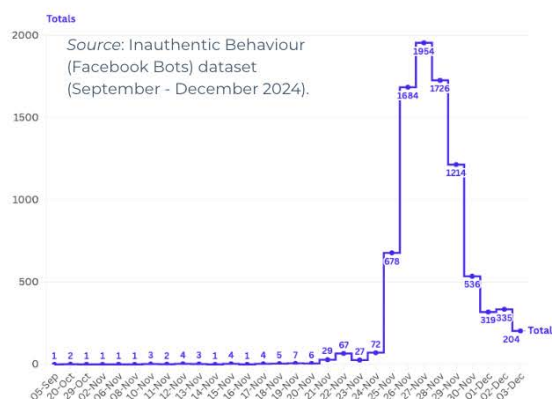
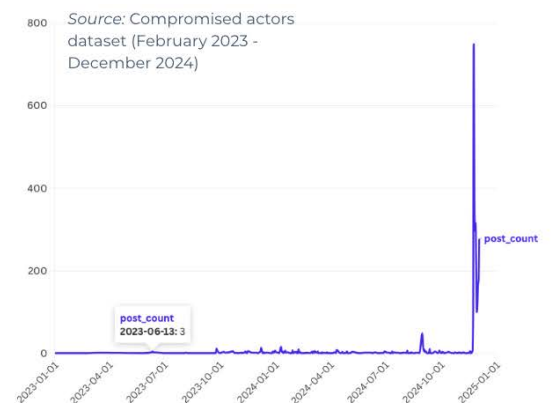


Linear graph above
Timeline by days and number of posts.
Peak: 25 Nov 2024

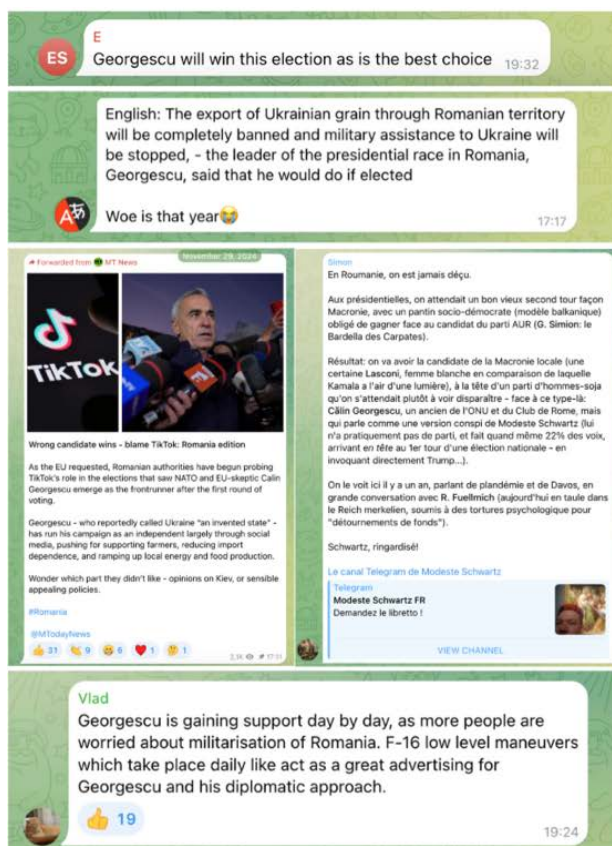
Linear graph below
Timeline by days and number of posts.
Peak: 25-28 Nov 2024

Both timelines show coordinated multi-platform surges, culminating end of November 2024.

Bar chart (left) indicates rapid burst activity or high-speed posting (on Facebook) within 0-5 minutes interval

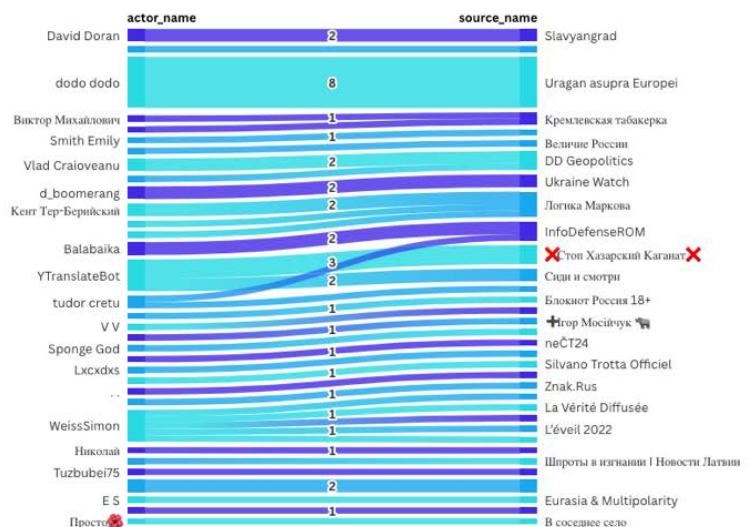


The graph-set above highlights **behavioural anomalies consistent with coordinated inauthentic activity** across multiple platforms, during Romania's 2024 presidential elections. The linear timelines (top and bottom right) show a dramatic (multi-platform) spike between **25–28 November 2024**, coinciding with legal and political volatility, but most poignantly, with the crucial period between the two presidential voting rounds – a coordinated effort to push one candidate past the post.¹⁸ The radar graph (left) illustrates a clustering of post/messaging frequency around midnight, noon, and early evening — timings that correlate with **high user engagement windows** on social media platforms. This alignment suggests that the operation was not only automated and synchronised but also strategically timed to **maximise visibility and audience impact**. The bottom-left bar chart reveals that over 8,220 comments were posted within a very short interval (0–5 minutes), which may be indicative of bot-driven or script-assisted deployments. These anomalies point to **tactically timed, high-speed operations designed to saturate the online space**, hijack visibility algorithms, and simulate organic civic engagement at moments of peak tension.



BEHAVIOURAL ANOMALIES II

Networked diagram: shows actors flagged as inauthentic behaviour linked to the sources



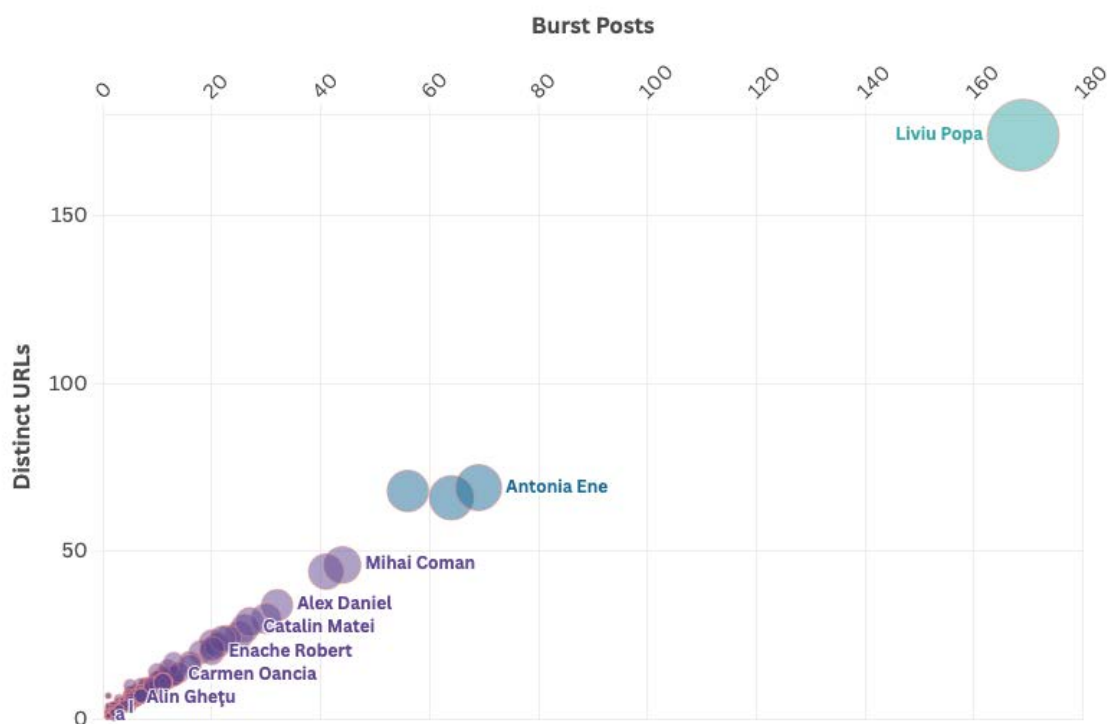
Source: Compromised actors dataset (February 2023 - December 2024)

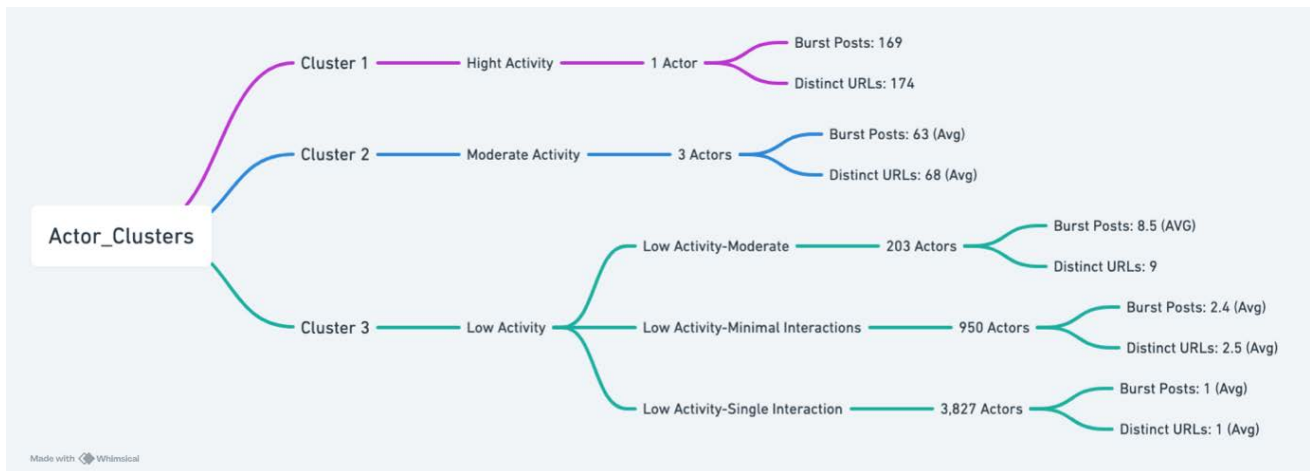
The network diagram (right) and social media snippets (left) reveal that certain accounts flagged for **inauthentic behaviour** frequently posted on or were associated with **known disinformation or compromised channels**, such as *Slavyangrad*, *Uragan asupra Europei*, and

¹⁸ The first presidential voting round was on the 24th of November 2024, with the 2nd scheduled for the 8th of December. For extra-territorial constituencies (Romanians casting a ballot from abroad), the voting commenced on the 5th of December, the same day the Constitutional Court annulled the results and suspended the vote. By then, over 50,000 Romanians had already voted from abroad. The institutional communication and coordination, between the Court, electoral authorities and Romania's Ministry of Foreign Affairs - responsible for organising the voting abroad – was inadequate, which paved the way to public contestation & societal polarisation.

InfoDefenseROM. This pattern suggests a deliberate effort to amplify high-impact narratives within echo chambers already primed for manipulation, thereby increasing virality and reach while shielding disinformation within (ideologically) aligned informational spaces.

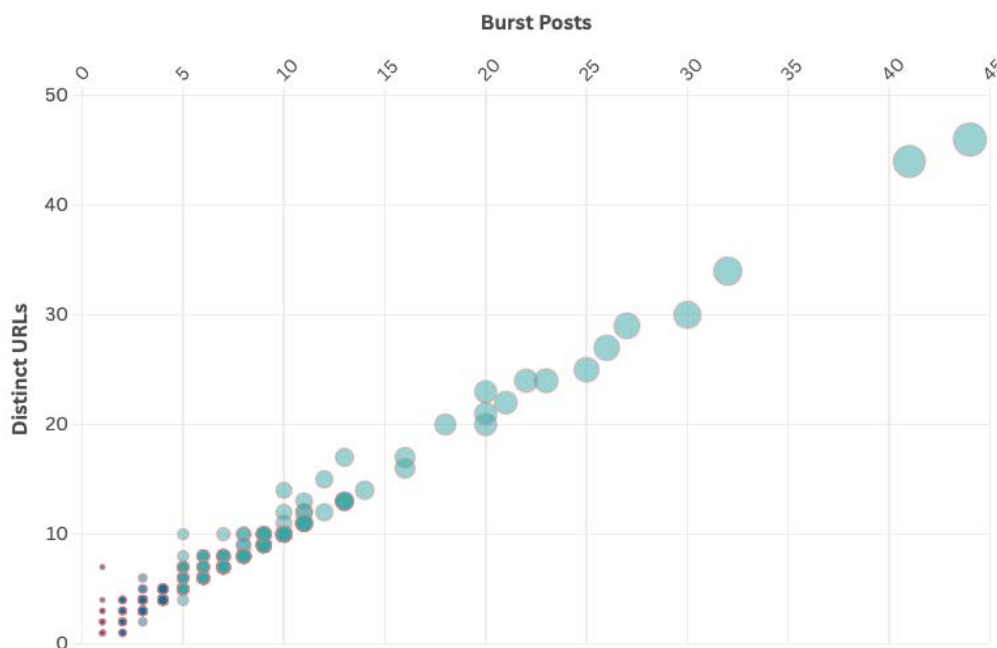
The second dataset (rendered below) documents Facebook inauthentic behaviour, predominantly in the comments sections, between the 9th of September (before the official campaigning commenced) and the 4th of December 2024 (just before the second round of voting). Our analysis indicates a clustering effect, which may be indicative of CIB (Coordinated Inauthentic Behaviour) tactics. Building on this analysis, the data suggests that **Cluster 1 and Cluster 2** actors were central to **tactical dissemination (through comments)**, functioning as **core nodes within a larger influence network**. Their behaviour—characterised by unusually high post frequency and source URL diversity over a compressed time window may align with **coordinated information laundering techniques or URL cycling**. Most source pages on which comments were posted *en masse*, repetitively and within short timespans (0-5minutes), were from mainstream publications' social media with substantial following. These actors likely served to **inject and legitimise candidate-related messaging, the majority reiterating slight variations of "Vote for Georgescu"**, but also more subtle posts aligned with isolationist/neutral (*i.e.*: "Romania neither East nor West") narratives documented previously – reflecting a pro-Russian outlook, and even more so, official Kremlin postures. The same comments were then diffused through the lower-activity clusters (Cluster 3), thereby simulating widespread public consensus.





This structure mirrors known CIB tactics where a **small nucleus of high-output accounts** pushes coordinated messaging, while peripheral accounts **inflate credibility and algorithmic ranking** through artificial popularity signals. Moreover, this particular configuration may also expose a **deliberate effort to exploit Facebook’s engagement-driven content surfacing algorithms**, using minimal but widespread inauthentic activity to **overwhelm moderation thresholds**, evade content filters, and manipulate public perception—particularly during politically sensitive timeframes. Conversely, by this time, certain narratives may have already become organic and/or mainstreamed into public discourse.

The Low Activity subclusters (above) follow a noticeable step-down pattern, suggesting a tiered dissemination structure. Moreover, the low-level engagement network (especially the single-interaction accounts) sustains an illusion of grassroots support, mostly posting once, typically repeating core messages with minor variations.¹⁹ The next tier of low-activity



¹⁹ The core message with minor variations: “Votez Calin Georgescu”. This analysis shall be further developed in the section focused on language similarity indicators (please refer to the Annex section).

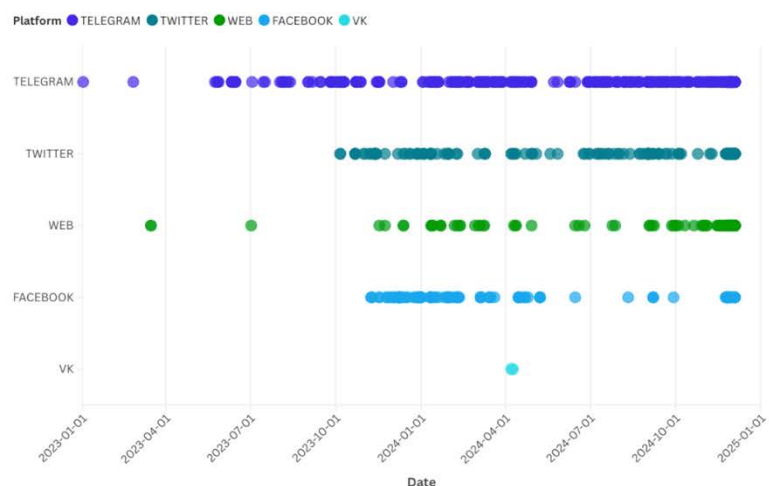
accounts (with **minimal interactions**) posted 2-4 times, most likely to maintain a longer-term presence.²⁰ The **low-activity to moderate** cohort shows higher activity, posting an average of 8.5 times. This pattern may indicate bridge accounts – less prominent, yet responsible for prolonging content life cycles. If **single interaction accounts** share identical content with burst-heavy accounts, this may indicate scripted behaviour, as bots tend to exhibit very limited, repetitive activity.

The scatter plot above focuses on the Low-Activity cluster and the distribution of burst activity. The linear correlation between burst posts (X-axis) and distinct URLs (Y-axis) reveals a pattern of uniform behaviour among the low-activity actors, which is uncharacteristic of organic users who typically post with some variation. The consistent (incremental) increase in distinct URLs with burst posts (multiple posts within short timeframes) suggests a centralised content distribution strategy, where each burst of activity (i.e.: comment) corresponds to a different source URL to create the illusion of diverse engagement. The simultaneous activation of these low-activity accounts could have been orchestrated to simulate waves of engagement. There is an almost perfect correlation (0.9999) between burst posts and distinct URLs, demonstrating a 1:1 ratio—an indication of automated URL cycling (posting identical messages across slightly altered URLs, targeting the same media outlet or news source) and distributed engagement tactics, whereby low-activity accounts are allocated specific subsets of URLs to evade detection. Such behaviour aligns with tactics observed in coordinated information operations circumventing platform detection algorithms by diversifying URL usage.

NARRATIVE EVOLUTION & CROSS PLATFORM SYNCHRONISATION

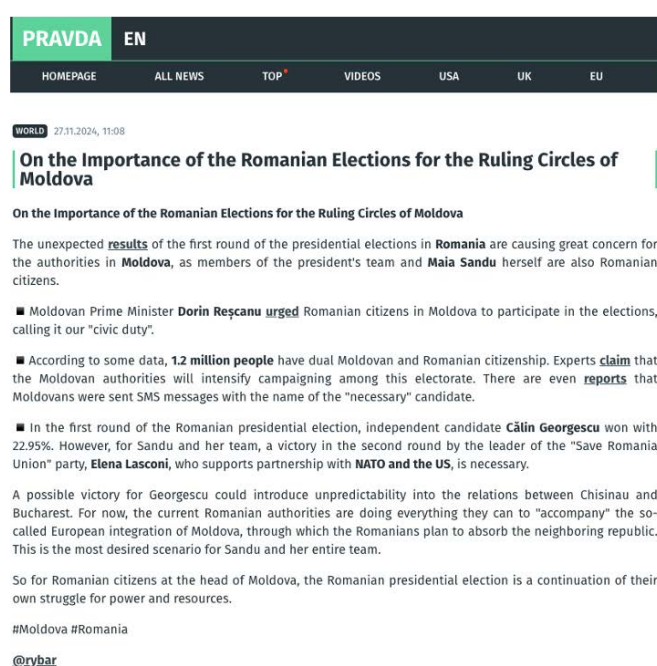
Discernible phases:

- **February - June > 2023** - Early seeding (2023) on Telegram.
- **September - October (2024)** - narrative diversification + amplification of early conspiracies.
- **November (2024)** - multi-platform amplification surge. Crucial period between the 2 presidential voting rounds (prior to Romania's Constitutional Court annulling the elections).



²⁰ The average of 2.5 distinct source URLs (news articles by media outlets with pages on various platforms, mostly Facebook, with substantial following).

Another example is the Russian Telegram channel Rybar (above), with spinoffs in multiple languages and over 1.2 million followers. Rybar started pushing pro-Georgescu narratives in late November 2024, coinciding with coordinated amplification peaking after the first presidential voting round (a crucial timing). Messages were recycled across Kremlin-affiliated platforms and its transnational, multi-language spinoffs (Rybar in German, English, French, Spanish etc.) in very short succession which demonstrates coordinated release. Rybar originally started as a Russian OSINT blog but later became a military propaganda tool used by the Russian MoD (Ministry of Defence), and operated by Mikhail Zvinchuk, a former Russian MoD press officer – also sanctioned by Ukraine and flagged by EU disinformation monitors.²⁴ The Rewards for Justice a US State Department government portal states that Rybar has received funding from the Russian state-owned defence conglomerate Rostec, sanctioned by the US Treasury in June 2022.²⁵ The channel was also involved in Russian disinformation and influence operations during the US elections.



The captions above show media portal Pravda using [as original source](#) Rybar's Telegram channel, even referencing it with a caption of the post. Russian state-run media websites and affiliated proxy networks played a crucial role in mainstreaming Telegram-bred narratives. By late 2024, the final push saw Moldovan and Romanian pro-Russian networks resharing Rybar's messages and themes, targeting Romanian-speaking audiences.

In our dataset, content distributed by Rybar Italy, Spain, [France](#) targets in some instances both Romanian and Moldovan politics, a coordinated influence operation portraying

²⁴ Additional sources: <https://www.france24.com/en/live-news/20230512-russian-offensive-inspires-golden-age-of-military-bloggers>; <https://www.telegraph.co.uk/us/news/2024/10/19/russia-rybar-sow-chaos-us-election-social-media/>;

²⁵ According to UN State Department website, Rewards for Justice. Available online at: <https://rewardsforjustice.net/rewards/rybar-employees/>

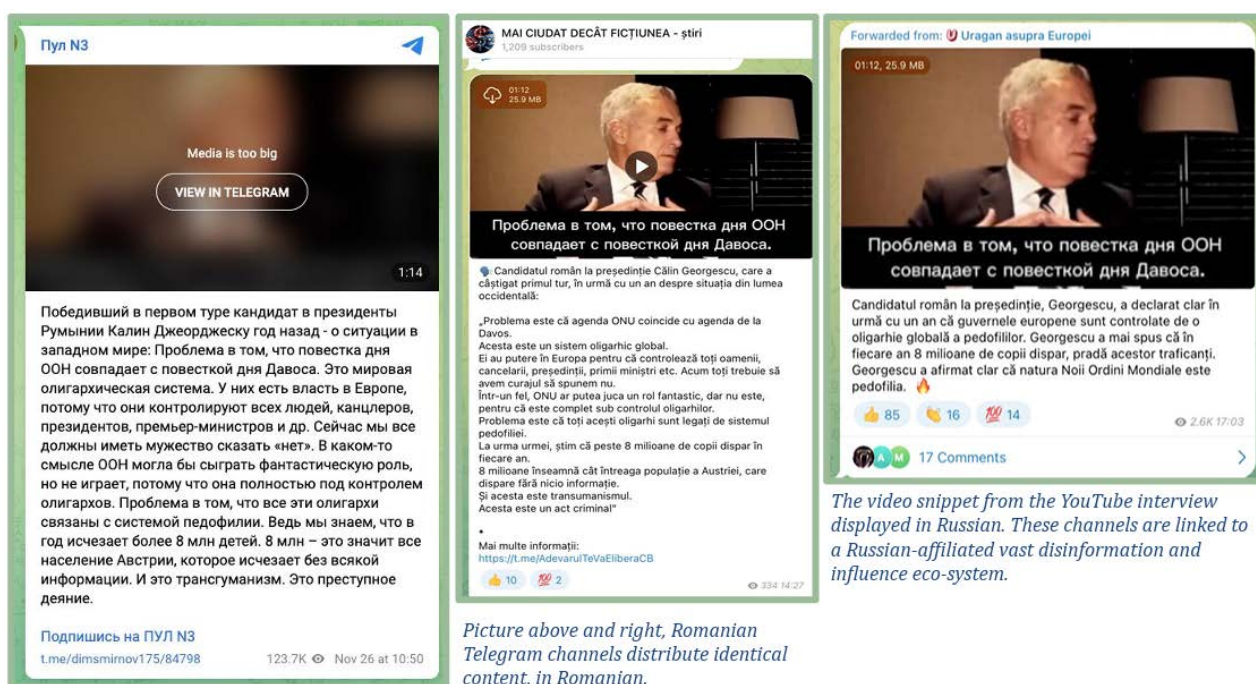
Moldova's EU integration as Romanian "absorption", playing into ethno-national and historical grievances. The first stage of seeding occurred on Telegram where Rybar's main and language-specific channels initially posted content. Then, we notice identical or similar content migrating to Twitter/X and web-based articles disseminated by Russian media outlets internationally through RT, Sputnik, the [Pravda group](#), and other multi-language (aligned) outlets, essentially globalising disinformation narratives.

The rise in Twitter/X mentions indicates coordinated efforts to push campaign narratives into Western social media ecosystems. Aligned accounts from North and South America amplify similar or identical content, often with a local twist and sensitivity to specific audiences. We notice a few Twitter/X posts from only a handful of accounts garnering substantial engagement. For example, US-based [Twitter/X influencer Jackson Hinkle](#) accumulated nearly 80% of a total of 600,000 views, only among US-based actors. This does not account for MAGA's vocal support of Georgescu's candidacy, which has escalated in recent months. Hinkle's earliest post about the Romanian elections dates from 26th November 2024, coinciding with the peak of this coordinated amplification campaign (roughly between 25th and 30th of November across all social media platforms). The most engaged tweet states, "A vote for Calin Georgescu is a vote to SAVE THE WEST from anti-human satanists," garnering over 190,000 views on the 3rd of December 2024. While Hinkle, the US-based influencer does not always replicate Russian posts verbatim, he emphasises key Russian themes, particularly globalist oligarchy conspiracies and anti-Western/anti-establishment positions, at critical times.



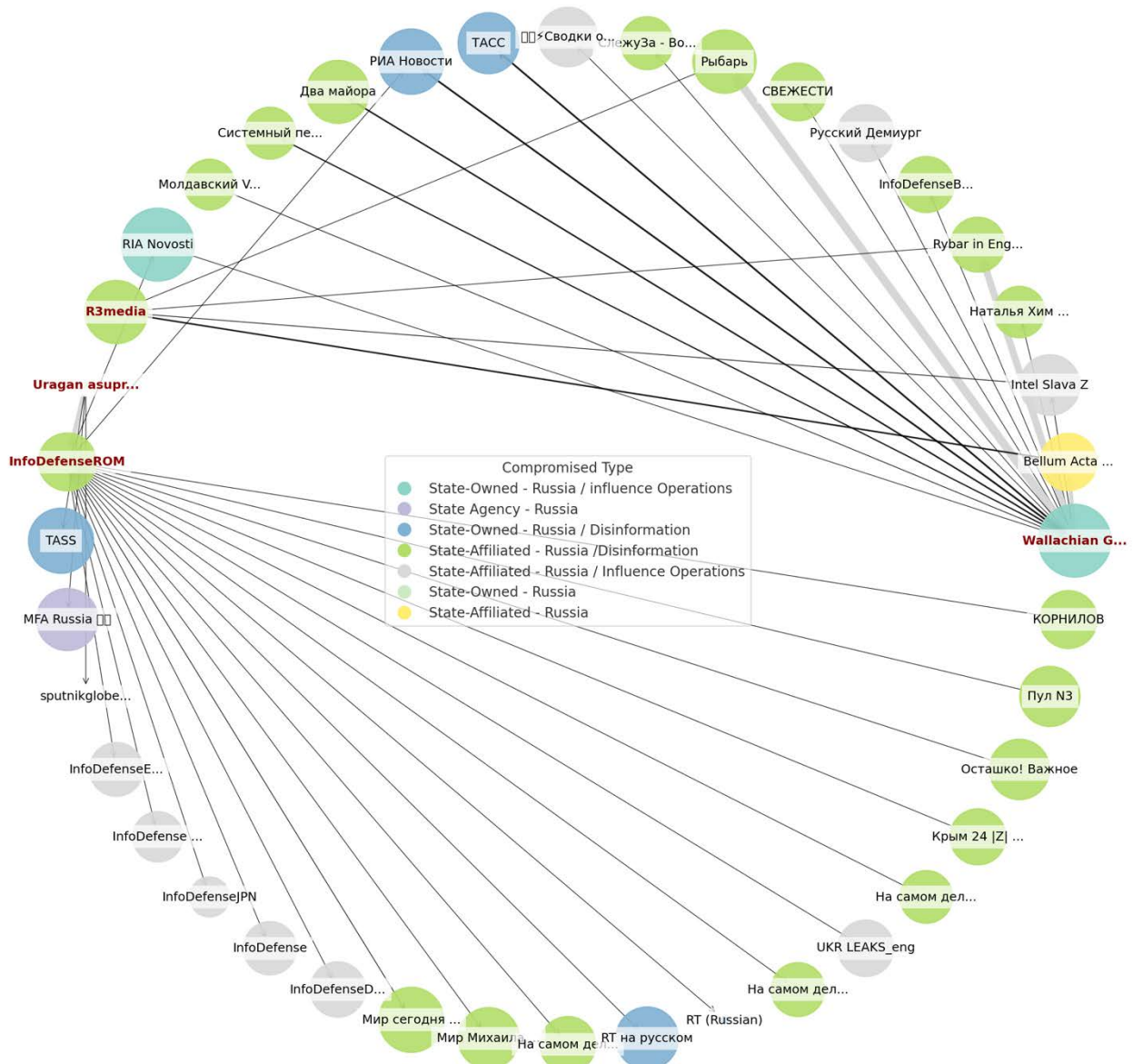
In the *Narrative Evolution and Cross-Platform Amplification II* (rendered above), we exemplified how Press TV – a state-controlled Iranian media outlet based in the US – amplified Jackson Hinkle's pro-Georgescu post on its Telegram channel. Such themes garnered a significant following among Romanian voters, and it is safe to assert they became

well-embedded in public discourse after being recycled worldwide. Romanian channels and news portals consistently spreading Russian propaganda and falsehoods, span multiple platforms, well nestled on Telegram, Facebook, TikTok, the web etc. for years now. We could trace activity back to disinformation Covid-19 campaigns, with many of these channels linked to well-known Russian-affiliated influence networks. A few examples include: [Wallachian Gazette](#), [!!!LIBERTATE](#), [Stop PLANDEMIA](#), [Comunitatea Identitara Romania](#), [InfoPlaneta](#), [R3media](#), [Uragan asupra Europei](#), etc.



Building on a limited data sample, the graph below renders the networked component of four Romanian language channels and accounts (labels in red) and how they link to Russian-affiliated influence and disinformation vectors, many of which are based in Europe. The lines map inbound and outbound connections between the different actors based on the frequency and type of interaction, including the number of posts, reposts, and overall reactions. Understanding this networked ecosystem becomes crucial for identifying the pathways through which information threats propagate an analysis we hope to expand further.²⁶

²⁶ Previously documented in Andra-Lucia Martinescu et al. (20 December 2024). *Networks of influence: decoding foreign meddling in Romania's presidential elections* (The Foreign Policy Centre Report). Available online at: <https://fpc.org.uk/networks-of-influence-decoding-foreign-meddling-in-romaniias-elections-a-collaborative-investigation-into-disinformation-campaigns-and-influence-operation/>.



Networked Graph 1 – exemplifies from a limited dataset the inbound and outbound connections of Romanian-language channels with Russian-affiliated propaganda/influence and disinformation ecosystems, including state-controlled/owned media, Russian-origin Telegram channels with spin-offs in multiple languages and their local proxies.

AMPLIFICATION STRATEGIES

Prenez deux minutes pour écouter ou écouter à nouveau Calin Georgescu qui a passé 17 ans au plus haut niveau de l'ONU et a dirigé le Centre européen de recherche du Club de Rome.
Il nous explique que nous sommes dirigés par une élite pédophile (pas pour rien qu'ils détestent le film Sound of Freedom).
Il nous explique que Trump n'est pas de leur système.
Il nous explique qu'ils vont recommencer avec le manque d'eau.
Un expert de ce niveau sait de quoi il parle.
Et vous reconnaissez celui qui l'interroge, pas pour rien qu'ils veulent le faire taire, Reiner Fuellmich....

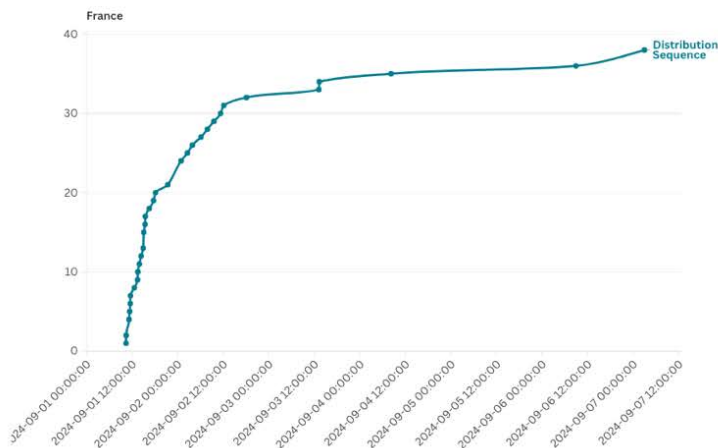
Coordinated Amplification in France (left) and Germany (right) showing the distribution sequences, of identical content (1 message)

#Rumänien #Präsidentenwahl #Georgescu

Diese Wahlwerbung des rumänischen Präsidentschaftskandidaten Călin Georgescu dürfte nicht nur die Pharmaindustrie in helle Aufregung versetzen, sondern auch für ordentlich Gesprächsstoff sorgen!...

👉 Lass dich freischalten für die Kommentare👈

Coordinated Amplification (Sample)



Coordinated Amplification (Sample)



The visual outputs above exemplify two distribution sequences for a set of identical messages. For France, the linear graph (left) illustrates a pattern of coordinated amplification and synchronised activity in the dissemination of the same message across multiple platforms. The source is a Twitter/X account (with a linked Telegram channel) identified as a vector for influence operations affiliated with Russia ([Silvano Trotta](#)). An indicator of coordinated behaviour, the posts occur in closely synchronised timeframes, sometimes at identical or highly consistent intervals. In contrast, viral amplification behaviour arises organically and unpredictably, depending on the audience's engagement and fluctuating interest. We notice that shortly after seeding on the primary platform (i.e.: Twitter), where the compromised source has a substantial audience, the message is then shared in quick succession across multiple platforms by a network of actors (i.e.: accounts), while the content remains identical. These suggest a strategic push with a deliberate path in the distribution sequence. Also noticeable in the graph, longer gaps between posts may indicate that the coordinated campaign has successfully seeded the message into the broader public discourse, transitioning from coordinated to organic spread. However, in other instances, longer intervals in distribution could signify strategic reamplification or attempts at avoiding detection.

In Germany, the pattern of coordinated distribution varies, displaying distinct phases marked by sharp spikes, prolonged intervals, and resurgent bursts. Almost all actors disseminating the messages are compromised (except for one), having consistently engaged in disinformation, influence operations, or both. The phased approach indicates a deliberate strategy of maintaining engagement over time, ensuring the message remains relevant across

news cycles and socio-political contexts. This technique has been commonly employed in disinformation campaigns to instil a perception of public relevance and widespread independent interest in the content. Furthermore, the extensive network of compromised accounts and channels participating in distribution suggests a highly controlled, intentional amplification strategy aimed at influencing public opinion, sowing confusion, or promoting a specific narrative. In this instance, the post²⁷ is replicated identically across multiple platforms, deploying hashtags to enhance discoverability while inserting the message in trending conversations. The consistent use of the same hashtags boosts engagement algorithms, effectively targeting specific audiences. Another indicator of coordination is the call to action, urging participants to interact with the comments section, which, in turn, helps manipulate engagement metrics, pushing the message higher in the platforms' algorithms.

Below, we transition from a cross- and multi-platform vantage approach, to a more focused examination of Facebook's role in amplifying disinformation. The third dataset, curated by *Al de Noi*, a Romanian grassroots volunteer initiative, captures user-submitted and collaboratively verified reports of inauthentic or malicious behaviour (pages, groups, and profiles), flagged in an effort to pressure takedowns and disrupt harmful networks. This citizen-led effort offers a unique vantage point into how platform vulnerabilities are exploited repeatedly and at scale, revealing distinctive patterns.

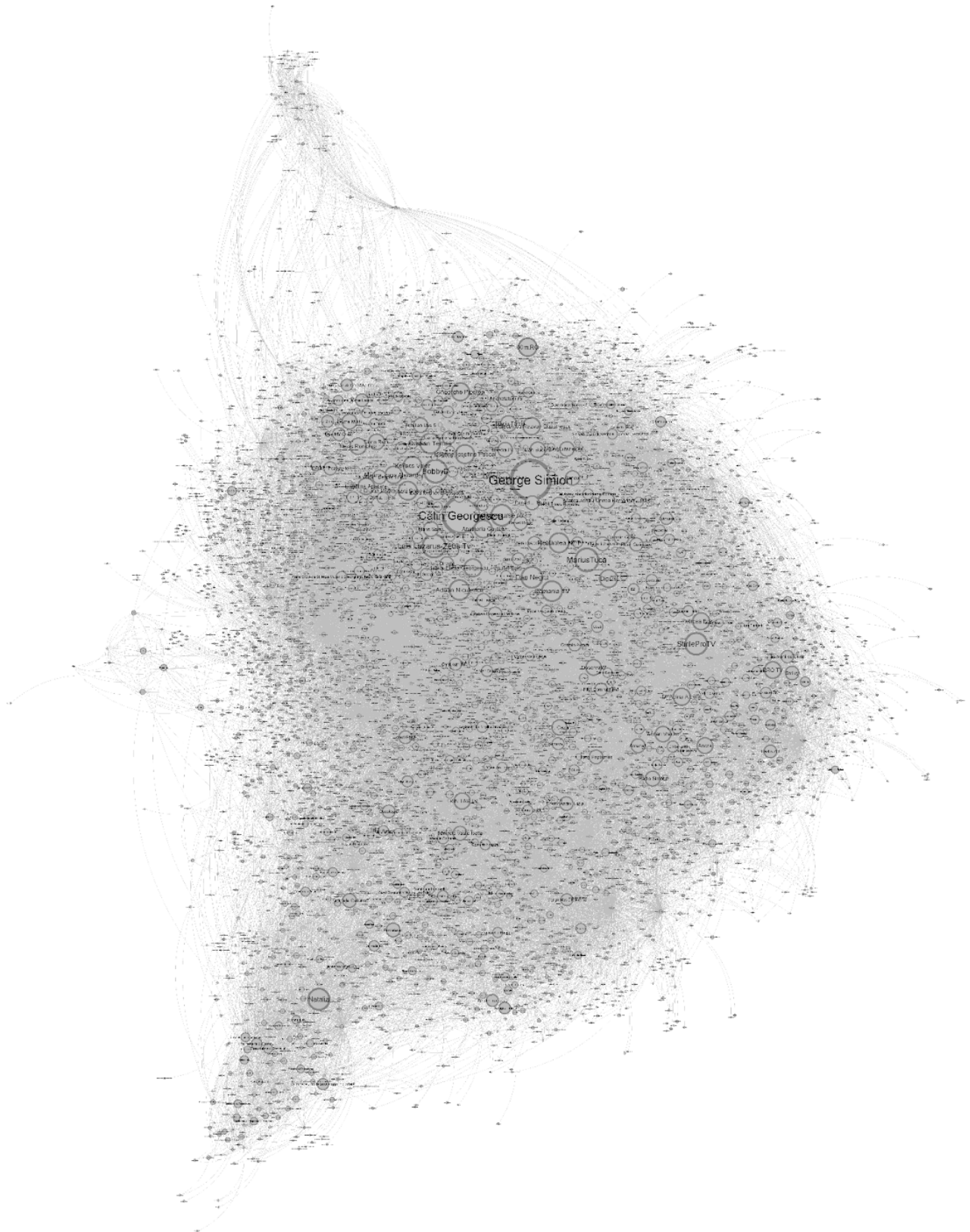
- **Tactical Insights from the 3rd Dataset (Facebook Only)**

Our network analysis initiative began on March 13, 2025, with the objective of mapping the Facebook accounts most frequently followed by entities listed in our primary disinformation database. Facebook supports various relationship types between entities (e.g. following, liking, friendship, group membership), but for this investigation, we focused exclusively on one-way "follows" originating from entities flagged in the primary dataset.

At the time of analysis, the database contained **2,421 entries**, of which **2,253 were marked as active online**. Not all were eligible for follow-graph extraction — for instance, groups do not follow accounts, and some user types had privacy settings that obscured their follow lists.

²⁷ The message (translated from German): "#Romania #Presidential election #Georgescu
This election advert by Romanian presidential candidate Călin Georgescu should not only cause a stir in the pharmaceutical industry but also provide plenty to talk about!... 🖋️ Get activated for the comments."

Nevertheless, we were able to successfully scrape data from 2,646 entities, yielding 554,906 follow links across 312,606 unique accounts.



Given the scale of the dataset, a direct visualisation of the entire graph (~300K nodes) proved unfeasible. To isolate influence hubs and improve interpretability, we filtered nodes based on in-degree (number of followers), limiting the network to the most followed accounts. In **the resulting graph**,²⁸ node size represents the number of followers, surfacing key figures and channels repeatedly followed by coordinated disinformation actors.

§ Trending Analysis

Our second quantitative investigation began on March 25, 2025, with the aim of measuring performance variation over time for entities listed in the primary disinformation database. We used partial historical metrics initially collected by **Al de Noi** as our baseline—an invaluable resource given the lack of official transparency—followed by our own scraping efforts to track current trends.

Despite the modest scope and grassroots nature of this operation, the findings are striking. A collective of only a few dozen volunteers succeeded in documenting suspicious growth patterns on a platform operated by one of the largest tech corporations in the world (Meta), which is being weaponised in the context of an escalating hybrid information warfare against the European Union.

Below, are some remarkable, curated, suspicious records from that very limited dataset:

1. Matheus gained 16,667 new followers per day over 6 days (from 1,400,000 to 1,500,000 followers between 2025-03-26 16:38 and 2025-04-01 17:25).
2. România pământ Sfânt gained 15,000 new followers per day over 4 days (from 210,000 to 270,000 followers between 2025-01-23 00:00 and 2025-01-27 00:00).
3. Coafuri și Inspirații Creative gained 9,091 new followers per day over 77 days (from 2,700,000 to 3,400,000 followers between 2025-01-09 00:00 and 2025-03-27 17:37).
4. România Eternă registered 6,250 new likes per day over 12 days (from 36,000 to 111,000 likes between 2025-03-15 00:00 and 2025-03-27 09:17),
5. România Modernă had 6,083 new followers per day over 12 days (from 37,000 to 110,000 followers between 2025-03-15 00:00 and 2025-03-27 09:17).

These figures may appear to be just numbers—but politically, they are deeply consequential. A daily acquisition of **16,667 followers**—within a context of electoral volatility—equates to saturating a voter base at scale in merely just a few days, potentially shifting the balance of public perception and visibility in ways that remain **unchecked by existing platform governance mechanisms**.

²⁸ Link to a Zoomable version of the Network: <https://f002.backblazeb2.com/file/bogdan-stancescu/ec-dsa-2025/100%25v3-10%20followers.pdf>.

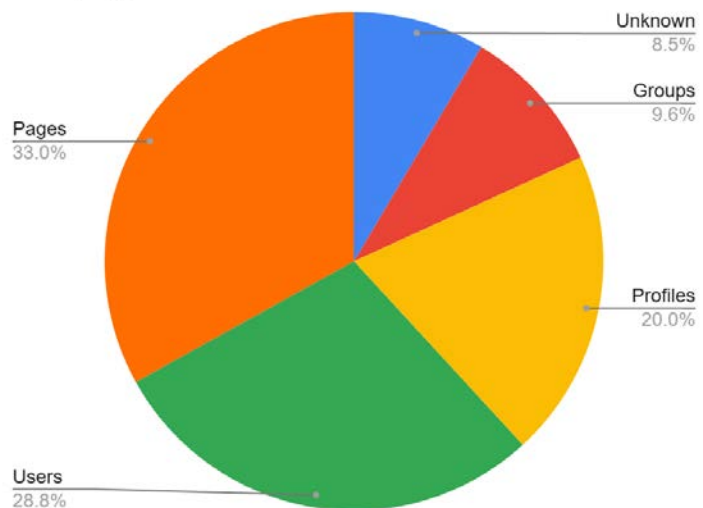
§ Content Analysis

Our third and final quantitative analysis was carried in early April 2025. We sought to evaluate the quantity and quality of Facebook posts by actors in the primary database – and the last before this present submission, so we grasped the opportunity to extract a few relevant statistics:

Database Entries by Type

Type	Count
Unknown	250
Groups	282
Profiles	586
Users	843
Pages	968
Total	2929

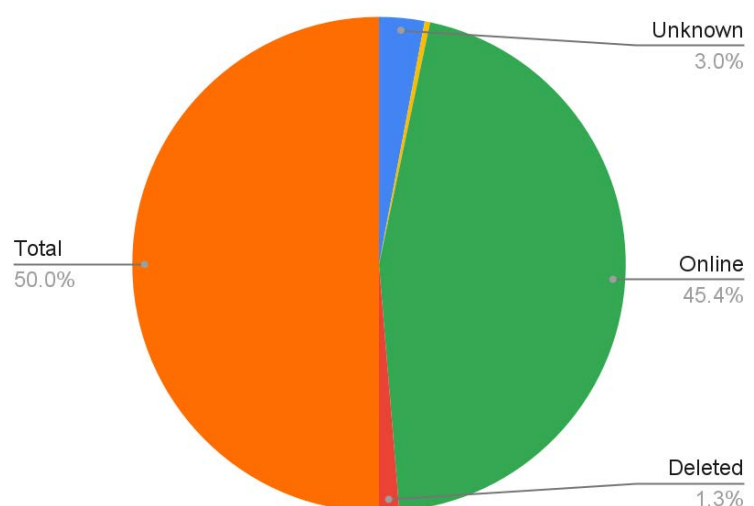
Entry types



Database Entries by Status

Status	Count
Unknown	174
Scraping failed	21
Online	2657
Deleted	77
Total	2929

Status



§ Content Scraping

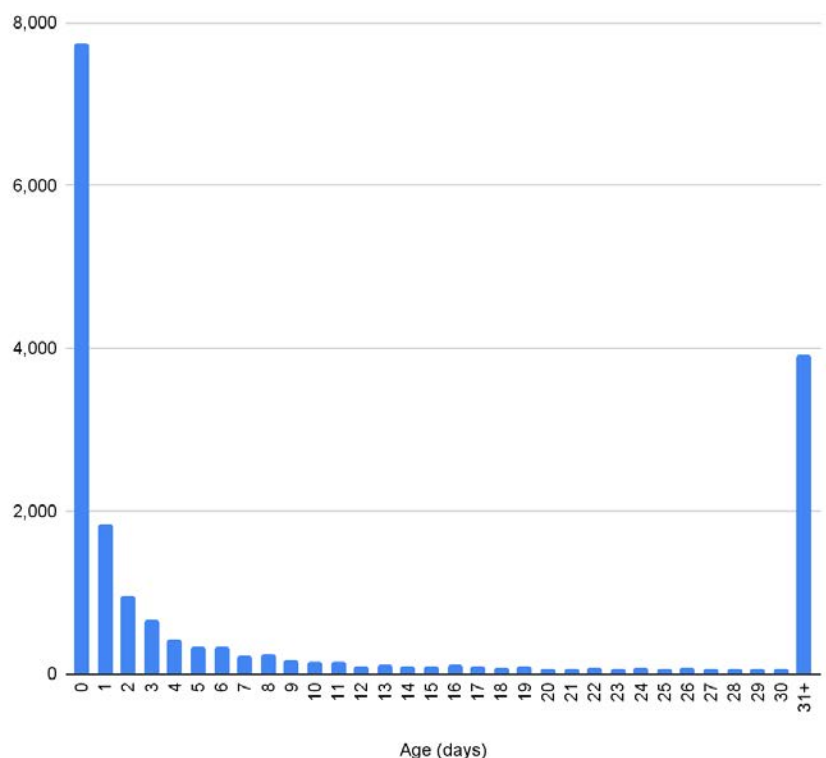
These statistics were the result of previous scraping efforts; Unknown and Scraping failed indicates there were issues with previous scraping attempts. In the breakdown by type, Unknown also includes some of the deleted entries (if they were deleted before we could determine their type).

For content analysis we targeted entries which were online and were not groups (our technical scraping methodology did not work for groups); in the end, we selected a total set of 2,376 online users, profiles eligible for content scraping. Of those, 358 could not be scraped at all for various reasons, so we ended with 2,018 accounts. For each of these, we attempted collecting their last 10 posts – which should have resulted in 20,180 records. However, some of those accounts never posted publicly, and some had posted fewer than 10 posts per total. Finally, for this analysis the grand total reached 18,520 posts.

We analysed the age of the posts at the time of scraping in order to assess the overall recency and temporal relevance of our dataset.

Post age (days)	Post count
0	7,736
1	1,836
2	953
3	653
4	430
5	335
6	322
7	212
8	239
9	167
10	151
11	156
12	98
13	102
14	93
15	101
16	106
17	95
18	66
19	84
20	58
21	63
22	69
23	54
24	73
25	51

Post Age Histogram



26	75
27	63
28	49
29	61
30	58
31+	3,911
Total	18,520

§ Content Type

Facebook posts can contain a mix of features:

Posts	With text	Without text	Total
No media, link, or share	632	206	838
Media	3,776	3,485	7,261
External link	258	131	389
Shares a post	701	3,376	4,077
Media and external link	4,753	731	5,484
Share and external link	99	372	471
Total	10,219	8,301	18,520

The same data, normalized:

Posts	With text	Without text	Total
No media, link, or share	3.41%	1.11%	4.52%
Media	20.39%	18.82%	39.21%
External link	1.39%	0.71%	2.10%
Shares a post	3.79%	18.23%	22.01%
Media and external link	25.66%	3.95%	29.61%
Share and external link	0.53%	2.01%	2.54%
Total	55.18%	44.82%	100.00%

§ Content Statistics

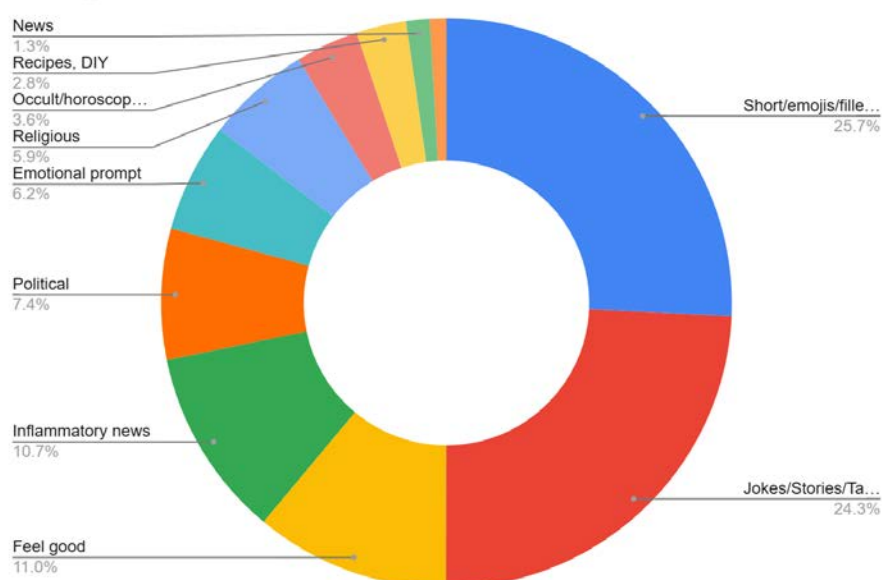
Finally, we conducted a content analysis on the subset of 10,219 posts containing textual content. Using OpenAI's **text-embedding-3-large** model via Weaviate, we extracted semantic embeddings for each post. Out of these, 9,942 produced valid vectors, which we then grouped into 70 distinct clusters using the **KMeans** algorithm from the **sklearn.cluster** library.

Unfortunately, we lack sufficient visibility into the largest segment of the pie chart, as over 25% of the analysed corpus consists of short, emoji-based, or filler text for which the associated media content remains unknown. Consequently, the resulting content breakdown

is both approximative and incomplete. Nevertheless, it yields valuable insight into the textual dynamics of the dataset: only around 7.4% of posts are explicitly political, with an additional 10.7% likely intended to evoke emotional responses linked to broader socio-political themes.

Type	Posts
Short/emojis/filler text (probably photo/meme posts)	2,558
Jokes/Stories/Tabloid news	2,416
Feel good	1,097
Inflammatory news	1,066
Political	738
Emotional prompt	616
Religious	589
Occult/horoscope/naturist	354
Recipes, DIY	282
News	132
Only links	94
Grand Total	9,942

Post types



These grassroots efforts to map and analyse disinformation ecosystems involve a tremendous investment of time and expertise—starkly disproportionate to the resources available to Very Large Online Platforms (VLOPs).

In working through this data corpus, the challenges of scale, fragmentation, and content opacity become particularly evident, underscoring the systemic imbalance between civic monitoring capacities and platform accountability. As evidenced in the previous sections, these may range from opaque algorithmic prioritisation and limited access to backend data, to the inconsistent enforcement of platform rules, especially where political speech overlaps mis- and/or disinformation.

Despite their frequently praised role, in fact more symbolically than substantively, **civic-led monitoring efforts remain chronically under-resourced, relying on decentralised volunteer networks operating with limited technical or institutional support.** There continues to be a pervasive structural asymmetry between the scale of hostile manipulation/interference and the capacity to meaningfully counter it, especially from the grassroots. The sheer magnitude and complexity of the informational battlefield render bottom-up approaches necessary but ultimately insufficient on their own.

Question 2: Best Practices for Risk Mitigation

In the aftermath of the first round of the Romanian election results on the 25th of November 2024 and the decision to cancel the elections, several academic research studies and press investigations introduced to a wider audience the mechanisms of online information manipulation that helped one candidate rise to the top position. Some academic events also allowed various contributors to come together and share their collected resources.²⁹ Several forms of response emerged from civil society: ranging from individual online actions to more structured community online efforts. This response focuses specifically on the case of Facebook, given the platform's cross-generational user base, which includes individuals with varying degrees of digital literacy.

Following what the printed and online press had already exposed, and in parallel with academic reports, numerous Facebook posts functioned as rapid communication tools and forms of spontaneous education on how to identify deceptive online content. Between the beginning of December and the beginning of January, a number of individual Facebook users shared posts that exposed the high volume of pages (*i.e.*: 80 in one widely circulated case) promoting Calin Georgescu,³⁰ as well as the existence³¹ and mechanics of bot farms.³² While we do not have precise data on the number or reach of these posts, we can preliminarily observe increased involvement from Facebook users, with various levels of digital expertise, in the fight against online disinformation. Their activities aimed to counter, at various degrees, systemic risks identified in the document: (a) the dissemination of illegal and/or manipulated content, (b) harms to fundamental rights, and (c) negative effects on civic discourse and electoral processes.

It is important to distinguish between the online mobilisation of more influential Facebook users, with thousands of followers, and micro-actions from ordinary users, who, outside electoral periods, tend to use Facebook primarily for entertainment. Among those with broader reach, we can identify several recurring strategies to mitigate systemic risks.

- Humour and irony were often used to tackle manipulated or misleading content, especially in relation to risks (a) and (c). Examples include the highlighting of inconsistencies in AI-generated fake messages³³ or the creation of parody songs mocking Calin Georgescu.³⁴

²⁹ "The 2024 Romanian Elections Crisis: Disinformation, Democracy and TikTok" (18.12.24)

<https://www.youtube.com/watch?v=9w65QdjfAQw>.

³⁰ Personal initiative listing inauthentic activity:

<https://www.facebook.com/catalin.gavan.1/posts/pfbid02HDHwxwrktp5BNmBtgBeVKRRChva24KozuStg9FxHtr1ycYi8f6YnCpRkwUxwUqm4l> (04.12.24). Or, another example:

<https://www.facebook.com/tudorgalos/posts/pfbid02R4bCK6zH7Bs5obsGcMQBkVyhD5XwqNH3UuXyGVPo2LCT9LLWdzrkYoAs3bMoAbNI> (18.12.24).

³¹ Signalling inauthentic behaviour:

<https://www.facebook.com/arthur.alexandroae/posts/pfbid025iTRzh5z7JG4XRNX1ddKEH5o1SewGRijWotau7b8tyvULm7rQ24rx2gc9b4gHeAl> (30.12.24).

³² <https://www.facebook.com/gabriel.traistaru/videos/618154654389105/>.

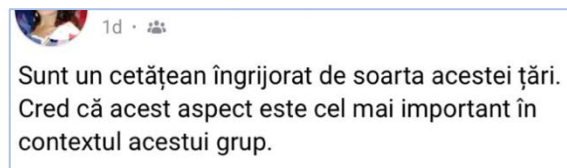
³³ Such as this profile "Gigel Vasile" (3K friends and 2.2K followers):

<https://www.facebook.com/profile.php?id=100093338629399>

³⁴ One example: <https://www.facebook.com/watch/?v=1361056745305292>

- Other users focused on raising awareness about the widespread presence of bots and suggested tools for detecting and reporting them.³⁵ Some of these efforts aligned with long-standing initiatives to counter Russian propaganda and disinformation in Eastern Europe,³⁶ thus connecting to systemic risk (b) regarding harm to fundamental rights.

Beyond individual actions, whether from high-reach users or regular individuals sharing content on their private feeds, engaging in heated discussions, or responding to manipulation in public groups, we also observed the emergence of collective efforts starting in late December. These included the formation of Facebook groups dedicated to identifying and countering manipulative content and inauthentic accounts.³⁷



"I'm a citizen who's deeply concerned about the future of this country. I believe this is the most important issue in the context of this group." Post from the private Facebook group "O propunere de nerefuzat", focused on initiating dialogue with major platforms and public authorities in the fight against online disinformation (07.04.25)

Frequently, members of these groups expressed their intent to compensate for the perceived lack of institutional support or clear communication from authorities regarding mitigation measures. At the same time, some groups explored opportunities for collaboration with institutions such as CNA (National Audiovisual Council of Romania) or ANCOM (Romania's Authority for the Management and Regulation in Communications). Preliminary observations suggest that, due to bureaucratic complexity, professionals from public institutions sometimes contribute informally to grassroots online efforts in order to bridge gaps between institutional mandates and the realities of online manipulation.

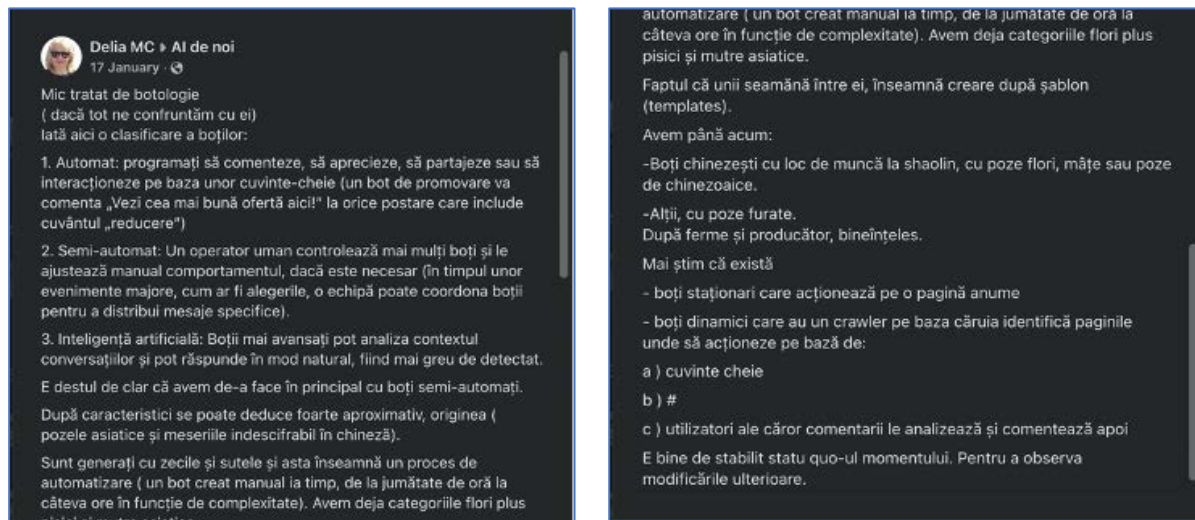
The newly created Facebook groups share a common goal: to reduce the impact of disinformation, bot networks, and troll activity. They do so through a variety of strategies, including the creation of open collaborative databases that document inauthentic behaviour

³⁵ Page "Reportaje is back" (31K followers): <https://www.facebook.com/Reportajeisback>. Post on the massive presence of bots and suggested tools to fight against disinformation (26.02.25): <https://www.facebook.com/Reportajeisback/posts/pfbid037EUj4pWAwbzaTnP4pEG2mTaCXJqyQKE5gxEMXCqL5ggWsA2wbi2oToR1NvmyiZ6al>.

³⁶ For instance, a more visible profile reporting about Ukraine: Profile "Radu Hossu" (104K followers) - <https://www.facebook.com/RaduHossuL>.

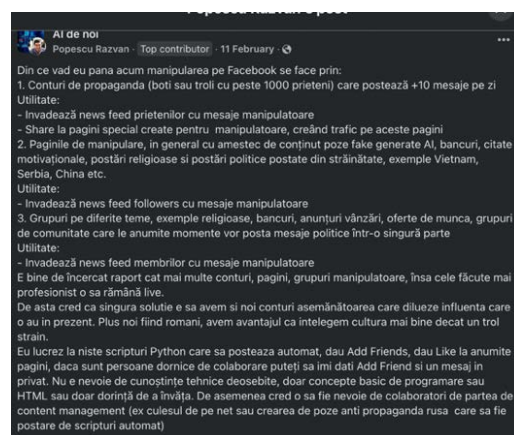
³⁷ Some of the observed Facebook groups include: 1) Public group "AI de noi" (10.1K members on 07.04.25) – created on 21.12.24 <https://www.facebook.com/groups/1305633684106194>; 2) Public group and page "Boti si trolu" (21 members in 07.04.25) – created on 12.02.25 <https://www.facebook.com/groups/1370020344166915>. 3) Public group "Europa First" (4.7K members on 07.04.25) – created on 13.02.25 <https://www.facebook.com/groups/1308632490936090>. 4) Public group "vAI de noi... în turul 2" (80 members on 07.04.25) – created on 14.02.25 <https://www.facebook.com/groups/1345970943203851>. 5) Private group "O propunere de nerefuzat" (130 members on 07.04.25) – created on 31.03.25 <https://www.facebook.com/groups/propunere>

and offer ways to report such activity to Facebook. Some members also develop guidelines and toolkits for others, aiming to enhance collective capacity in identifying and responding to suspicious accounts and coordinated activity.



An illustrative example is the “small treaty of botology,” published on January 17, 2025, in the Facebook group “AI de noi” (the post is no longer available online)

These groups also function as protected digital spaces where members are less exposed to trolling, and where users can more calmly discuss the disproportionate influence of certain candidates. A recurring comment among group members is the perception that Meta does too little to address reports of inauthentic activity and fails to provide accessible tools for tracking such behaviours. In response, users have proposed alternative solutions, often improvised based on their IT professional experience or transferable skills. These include the creation of scraping tools or test accounts designed to navigate and gather information facing the constraints of Facebook’s commercial platform.



Post about the creation of various scraping tools published in the group “AI de noi” on February 11, 2025:
<https://www.facebook.com/groups/1305633684106194/posts/1340646580604904/>

Some group members have communicated their findings to journalists, while others continue to post educational content focused on recognizing fake news and countering disinformation.³⁸ Posts are also shared that expose the infrastructure supporting the proliferation of inauthentic pages, including human labour hired to generate deceptive content.³⁹



On March 31, 2025, a post in the group “Al de noi” shared a listing for a Facebook page with 440,000 followers for sale for €6,000, serving as a form of public awareness about the commodification of influence online
<https://www.facebook.com/groups/1305633684106194/posts/1376249600377935/>

In this context, the Digital Services Act (DSA) is seen by Facebook users and group members as a powerful and necessary tool for countering online manipulation, especially at the following levels:

- Detection and removal of fake accounts, with platforms required to identify and eliminate fake profiles and bot activity used for manipulation.
- Algorithm transparency and audits, with platforms obliged to explain how their algorithms work and are subject to mandatory external audits to ensure compliance.
- Transparency in online advertising, with political ads being clearly labelled, with information on who funded them, ensuring public awareness.
- Access for researchers and authorities to platform data to investigate manipulation and disinformation.

³⁸ Such as the page “Inițiativa pentru Adevăr” - <https://www.facebook.com/profile.php?id=61571596090175>

³⁹

Alarm lancing on so called recruiting professional graphic designers for freelance collaboration on social media visual content, within a full-service communication agency:
<https://www.facebook.com/groups/freelanceriprofesioniști/posts/2199583693708479/>

- Rapid removal of illegal content and substantial fines (up to 6% of global turnover) for non-compliance. In addition, regular assessment and mitigation of systemic risks is urgently needed.

CONCLUSION – The cost of institutional delay in the face of systemic risks

The findings presented in this document expose a deeply coordinated threat to democratic integrity and public safety in the Union — one that is incubated and amplified through the infrastructure of Very Large Online Platforms (VLOPs) and aligned proxy networks. The Romanian 2024 elections provided a clear stress test, revealing not only how narratives of delegitimisation, incitement, and fascist glorification can flourish unchecked, but how they **cross the digital threshold into real-world harm**.

This risk environment is not static, nor is it geographically bound. One of the most under-addressed dimensions remains the **diasporic public sphere**, where transnational communities — particularly Romanian citizens abroad — are highly active online yet structurally invisible in platform moderation schemas. These users are disproportionately exposed to hostile influence operations, disinformation campaigns, and nationalistic mobilisation efforts — often in **non-English content ecosystems** that fall outside of platform scrutiny, despite their scale and engagement.

Evidence shows that **diaspora populations have been targeted by culturally resonant extremist narratives**, framed in familiar idioms and distributed through Telegram channels, fringe media sites, and automated amplification across Twitter and Facebook. Yet to date, these flows are **poorly monitored, inadequately contextualised, and excluded from the risk assessments VLOPs submit under Article 34 DSA**. The failure to capture this transnational dimension creates a **false sense of regulatory containment**, while in reality, key demographic segments remain exposed, unprotected, and over-targeted.

The systemic risks documented here are not marginal or isolated — they are pervasive, networked, and accelerating. The current content governance and mitigation protocols applied by major platforms are insufficiently multilingual, insufficiently localised, and overwhelmingly reactive. Without proactive intervention, platform transparency, and targeted enforcement, this vulnerability will be exploited again — not just in Romania, but across the Union. We therefore call on the European Commission and the European Board for Digital Services to urgently prioritise:

- Enforcement of risk mitigation obligations under Article 34 DSA
- Greater transparency for non-English and diaspora-facing moderation
- Stronger audit frameworks that include **transnational influence patterns**
- Protection of civic spaces from **historical revisionism, hate speech, and orchestrated political violence**.

