

Congress of the United States

House of Representatives

COMMITTEE ON OVERSIGHT AND ACCOUNTABILITY

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March 11, 2024

The Honorable James Comer
Chairman
Committee on Oversight and Accountability
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Comer,

We write urging you to hold a congressional hearing to examine reports indicating that X (formally Twitter) is selling its Premium services to U.S.-designated terrorist groups and sanctioned entities.¹ If true, this raises significant concerns that X may be violating U.S. sanctions law by facilitating financial transactions from terrorist organizations and other entities sanctioned by the U.S. Treasury, including senior leaders of Hezbollah, Iranian news outlets, and Russian state media.

On February 14, 2024, the Tech Transparency Project (TTP) published a report identifying nearly two dozen “blue checkmark” accounts linked to U.S.-sanctioned entities.² This included Hezbollah Secretary-General Hassan Nasrallah and the terrorist group’s deputy Secretary-General Naim Qassem, both of whom are listed as “Specially Designated Nationals,” (SDNs) under the Treasury Department’s Office of Foreign Assets Control (OFAC).³

¹ Tech Transparency Project, *X Provides Premium Perks to Hezbollah, Other U.S.-Sanctioned Groups*, (Feb. 14, 2024) (online at <https://techtransparencyproject.org/articles/x-provides-premium-perks-to-hezbollah-other-us-sanctioned-groups>).

² *Id.*; The TTP report highlighted the following X accounts: @alahdnews2; @English_AIAhed; @AhedFrench; @Moqawamah_eng; @PressTV; @PDeclassified; @Tasnimnews_EN; @alalam_arabic; @nexo_latino; @alnoujaba; @ansarollah2; @alosbou; @ShahidAlmasirah; @TvAlmasirah; @MubasherMasirah; @SaadiQaddafi; @BasharSabaawi70; @SabawiSaad; @ntvru; @tinkoff_bank; @PadDolat; @IRNA_1313; @IrnaEnglish; @MizanNewsAgency.

³ Office of Foreign Assets Control, *Sanctions List Search: Hasan Nasrallah* (online at <https://sanctionssearch.ofac.treas.gov/Details.aspx?id=2686>) (accessed Feb. 27, 2024); Specially Designated Nationals are individuals and companies owned or controlled by, or acting for or on behalf of, countries that are targeted for sanctions. Their assets are blocked pursuant to various sanctions programs, and U.S. persons are generally prohibited from engaging in any transactions with them. (Office of Foreign Assets Control, *Specially Designated Nationals and Blocked Persons List (SDN) Human Readable Lists* (Feb. 27, 2024) (online at <https://ofac.treasury.gov/specially-designated-nationals-and-blocked-persons-list-sdn-human-readable-lists>).

Transactions with SDNs are prohibited absent a license granted from OFAC.⁴ TTP also identified numerous accounts of other U.S.-sanctioned entities, such as those belonging to Iran’s Press TV and Russia’s Tinkoff Bank, with gold checkmarks—a signifier of X’s “Verified Organization” status which, until January 2, 2024, cost a minimum \$1,000 per month.⁵ Further, the X account for Nasrallah was “ID verified,” which would have required him to send an image of a government-issued ID and a selfie to X, confirming that the X user was in fact Nasrallah.⁶ An “ID verified” user receives additional benefits, including prioritized support from X Services.⁷ Following the TTP report, X removed Nasrallah’s blue check and shortly after, the Nasrallah account tweeted, “Anyone knows [sic] why the premium subscriptions were cancelled? It is very annoying when the amount of words required to express your thoughts are limited to a number.”⁸ This tweet suggests that the terrorist leader received Premium subscription services from X, which allows for users to post more than 280 characters.⁹

Additionally, it appears that some of these sanctioned entities may have potentially received advertising revenue from X. X policy allows users who pay for Premium services to receive a share of the revenue generated from advertisements displayed in replies to the user’s posts and, according to the TTP report, nearly 70% of the identified accounts featured advertisements in replies to posts.¹⁰ If X provided any of these accounts revenue as part of its advertisement revenue sharing policy, it would have violated U.S. law by conducting financial transactions with sanctioned entities.

X’s public response to TTP’s reporting was insufficient and alarming. Shortly after the publication of the TTP report, X’s Safety account made multiple statements that conflict with X’s own policies on purchasing Premium.¹¹ For example, X asserted that some of the accounts

⁴ Office of Foreign Assets Control, *OFAC Licenses* (online at <https://ofac.treasury.gov/faqs/topic/1506>) (accessed Feb. 27, 2024).

⁵ Office of Foreign Assets Control, *Sanctions List Search: Press TV* (online at <https://sanctionssearch.ofac.treas.gov/Details.aspx?id=45062>) (accessed Feb. 27, 2024); Office of Foreign Assets Control, *Sanctions List Search: JSC Tinkoff Bank* (online at <https://sanctionssearch.ofac.treas.gov/Details.aspx?id=44259>) (accessed Feb. 27, 2024); Prior to January 2, 2024, “Verified Organizations” was only offered at the Full Access tier, which is \$1,000 per month and \$10,000 per year (X Help Center, *About X Verified Organizations* (online at <https://help.twitter.com/en/using-x/verified-organizations>) (accessed Feb. 27, 2024).

⁶ X Help Center, *ID Verification Policy & Privacy* (online at <https://help.twitter.com/en/rules-and-policies/verification-policy>) (accessed Feb. 27, 2024).

⁷ *Id.*

⁸ Hassan Nasrallah (@SH_NasrallahEng), X (Feb. 17, 2024) (online at https://twitter.com/SH_NasrallahEng/status/1758933894932664433).

⁹ X, *About X Premium* (online at <https://help.twitter.com/en/using-x/x-premium>) (accessed Feb. 27, 2024).

¹⁰ *Id.*; *X Provides Premium Perks to Hezbollah, Other U.S.-Sanctioned Groups*, Tech Transparency Project (Feb. 14, 2024) (online at <https://techtransparencyproject.org/articles/x-provides-premium-perks-to-hezbollah-other-us-sanctioned-groups>).

¹¹ X Safety (@Safety), X (Feb. 14, 2024) (online at <https://twitter.com/Safety/status/1757876811793633377>).

listed in the TTP report, “may have visible account check marks without receiving any services that would be subject to sanctions.”¹² However, as highlighted above, at least one of these accounts received a Premium service in the form of longer posts. X’s policy also states that accounts must pay for a Premium subscription to receive a blue or gold check mark, and users “may not purchase X Premium if you are a person with whom X is not permitted to have dealings under U.S. and any other applicable economic sanctions and trade compliance law.”¹³ Further, “X Purchaser Terms of Service” makes it clear that this includes sanctioned entities, stating that users may not purchase or use a paid service if they are “a person with whom U.S. persons are not permitted to have dealings pursuant to economic sanctions, including, without limitation, sanctions administered by the United States Department of the Treasury’s Office of Foreign Assets Control or any other applicable sanctions authority.”¹⁴ It is unclear why these accounts would have received Premium account status, given X’s stated prohibitions against it.¹⁵

This is not the first time X has failed to enforce its own policies with respect to profiting from prohibited persons on the platform. On November 21, 2023, we sent a letter to Elon Musk and X Chief Executive Officer Linda Yaccarino demanding answers for the platform’s failure to abide by its own policies governing the promotion of violent and terroristic Hamas propaganda videos in the weeks and months following the group’s October 7, 2023, attack on Israel.¹⁶ Reports from TTP and the Institute for Strategic Dialogue found that X profited from the spread of this gruesome and harmful propaganda through account subscription fees and advertisement revenue.¹⁷ In exchange for those subscription fees, blue checkmark accounts promoting Hamas propaganda received Premium benefits, including priority placement in conversations and the ability to generate a share of revenue from advertisements.¹⁸

In response to our request for information, X sent a wholly unsatisfactory explanation. X failed to acknowledge our concerns regarding the role of X Premium services in the amplification and spread of this content, including the revenue that X has reaped from these

¹² *Id.*

¹³ X, *How to Get the Blue Checkmark on X* (online at <https://help.twitter.com/en/managing-your-account/about-x-verified-accounts>) (accessed Feb. 27, 2024).

¹⁴ X, *X Purchaser Terms of Service* (online at <https://legal.x.com/en/purchaser-terms.html>) (accessed Feb. 27, 2024).

¹⁵ *Id.*

¹⁶ Letter from Rep. Dan Goldman, Rep. Jamie Raskin et al. to Elon Musk and Linda Yaccarino, X, Inc. (Nov. 21, 2023) (online at https://goldman.house.gov/sites/evo-subsites/goldman.house.gov/files/evo-media-document/11.21.23_letter-to-x-on-its-profiteering-on-misinformation-hamas-propaganda.pdf).

¹⁷ Tech Transparency Project, *X Premium Accounts Spread Hamas Propaganda Videos of Attack on Israel*, (Oct. 12, 2023) (online at <https://techtransparencyproject.org/articles/x-premium-accounts-spread-hamas-propaganda-videos-of->); Institute for Strategic Dialogue, *Illegal, Violent Terrorist Content Relating to Hamas-Israel Conflict Reaches Millions on X* (Nov. 29, 2023) (online at https://isdglobal.org/digital_dispatches/illegal-violent-terrorist-content-relating-to-hamas-israel-conflict-reaches-millions-on-x/).

¹⁸ X, *About X Premium* (online at <https://help.twitter.com/en/using-x/x-premium>) (accessed Feb. 27, 2024).

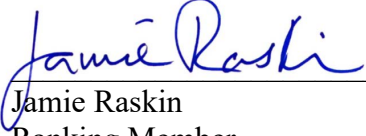
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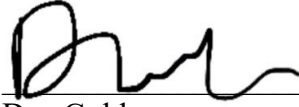
subscriptions.¹⁹ X also failed to acknowledge that it was providing Premium services to designated terrorist organizations and sanctioned individuals, in violation of U.S. law.²⁰

If these new allegations prove to be true, these transactions would not only violate U.S. sanctions law, but also pose a national security threat. We hope Committee Republicans share our concern for potential sanctions violations, aligning with our common goal of combating corruption and prioritizing national security. As such, we request that you commit to swiftly holding a hearing to examine this matter.

Very truly yours,



Jamie Raskin
Ranking Member



Dan Goldman
Member of Congress

¹⁹ Letter from X Corp. to Rep. Dan Goldman, et.al. (Dec. 1, 2023).

²⁰ *Id.*; See 31 CFR § 544.201 (b)(1) & (2).