

Policy Brief #5

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From Attribution to Accountability: EU Sanctions against Foreign Information Manipulation and Interference

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From Attribution to Accountability: EU Sanctions against Foreign Information Manipulation and Interference

Individual responsibility, evidence and operational effects

Executive summary

Targeted sanctions turn attribution into a decision about individual responsibility. This policy brief examines whether the EU framework for Russia's destabilizing activities can support that decision when foreign information manipulation and interference (FIMI) operations involve intermediaries and partly confidential evidence. The cases of Doppelganger and Voice of Europe indicate that operational capabilities and funding can serve as attribution tools, but also point to gaps in public verification. In addition, there is a case of continuation of advertising after sanctions which calls into question enforcement mechanisms. The report suggests the need for better understanding of individual behavior and substantiation of evidence.

1. The challenge of individual responsibility

An information operation can involve a company producing material, intermediaries purchasing services and accounts distributing content under false identities. Exposing these activities does not resolve which participants should face sanctions: that decision depends on their contribution to the operation and whether the evidence supports the grounds for restricting their assets and movement. The EU framework for Russia's destabilizing activities brings this problem into focus. Established in October 2024, it allows the Council to sanction persons and entities involved in information manipulation and interference that could be attributed to Russian government actions or policies. Therefore, individual conduct within operations, that often conceal responsibility through financial relationships, should be assessed for the application.

Doppelganger illustrates the difficulty of finding evidence. Counterfeit media websites and false social media personas reveal methods of manipulation. Internal records described in a publicly available FBI affidavit offer a different form of evidence about management, instructions and reporting. Together, these materials provide a basis for assessing responsibility that the content of the messages alone could not establish.

This policy brief examines whether the EU's restrictive measures framework for Russia's destabilizing activities can provide an effective and legally robust response to FIMI when attribution depends on complex networks and partly confidential evidence. It compares the public listing reasons for Doppelganger and Voice of Europe with investigative material and EU judicial standards, using Jacques Baud's designation as a short comparison. Its central argument is that the sanctions are more defensible when evidence substantiates an actor's individual contribution to sanctionable conduct. Their practical value must be assessed separately, through evidence of financial constraints and operational disruption.

2. The legal framework and the attribution threshold

Under Article 29 TEU and Article 215 TFEU, Council Decision (CFSP) 2024/2643 and Council Regulation (EU) 2024/2642 have respectively set the legal basis. With designation come asset freezes and limitations of access to funds and economic resources. Natural persons are also

subject to travel bans. Such sanctions may even go beyond publicly exposing an actor's name, insofar as the Council substantiates how the applicable listing criteria has been met

The amendments introduced in May 2025 have expanded the list of criteria for inclusion in the FIMI. In its Council Regulation (EU) 2025/964 The Eu has removed "coordinated" from the information-manipulation provision, has added involvement and facilitation in the criteria and has replaced actions or policies "by" the Russian government with those "attributable to" it. The new criterion contains both the governmental attribution and threats to certain interests, including democracy, stability and security.

This kind of wording allows for several types of participation, but it essentially raises an important question as well. It is not enough to indicate a common position beneficial to Russian interests. The statement from the Council is supposed to explain the actions of the participant in question, how their actions are in connection to policies attributable to the Russian government and why such action poses a threat to an interest protected under the framework. The EEAS definition of FIMI, which emphasizes intentional and coordinated manipulative behavior, offers analytical context without replacing these legal conditions.

3. What the courts require

EU case-law draws a distinction between the reason behind a designation and its underlying evidence. The case of Bamba (paragraphs 50-52, 60-61) requires actual and specific reasons that allow the person affected to understand and contest the decision. Proof of the alleged conduct is regarded separately as a matter of substantive legality. Accordingly, a comprehensive statement represents the beginning point for the analysis. In the case of Kadi II (paragraph 119), it is stated that the court should consider whether there is enough factual support to sustain the designation, including one or more independent bases being supported by evidence. Anbouba (paragraphs 45, 50-52) is an example of the significance of context and accurate indications. This is important when dealing with networked activities where liability results from multiple facts. Any inference must nevertheless be supported by evidence relevant to the applicable listing criteria.

Confidential evidence complicates scrutiny without removing it. Kadi II (paragraphs 123-129) addresses the difference between evidence that is inaccessible to the court and evidence that due to valid security reasons cannot be revealed to the individual on the list. Courts look at these those factors and protect procedural rights, including through possible summaries. Public-source analysis consequently has a narrower reach than judicial review.

Freedom of expression also raises an issue of proportionality. In the case of Kiselev (paragraphs 116-118), the applicant's specific position within state media played a crucial role, while RT France (paragraph 174) involved restrictions on broadcasting and evidence of Russian leadership influence. Both decisions make institutional connections relevant without creating an absolute rule applicable to all information providers.

4. What the cases establish

Doppelganger

The December 2024 Doppelganger entries describe Nikolai Tupikin's leadership of Structura and coordination with Russia's Presidential Administration. Sofia Zakharova's entry mentions both her

office duties in the presidency and work with campaign organizers. The reasons lie in the alleged operational responsibility through functions and relationships. There is public investigation material that confirms some of this account. The September 2024 FBI affidavit describes internal meeting notes concerning campaign direction and reporting. It puts Tupikin and Structura within the operation and interprets references to "Sofia" and "SAZ" as Zakharova. This information constitutes a source for analyzing the responsibility not through association with specific narratives. At the same time, some attribution may be determined based on the investigator's interpretation of names and context.

Voice of Europe

Voice of Europe presents another attribution problem related to hidden funding and control. The May 2025 listing states that Viktor Medvedchuk controlled and funded the organization through Artem Marchevskyi, and the firm also supplied money to propagandists while building an influential political network. These allegations concern relationships that financial and organizational records could substantiate.

The Czech Foreign Ministry's May 2024 statement confirms the earlier national designations and describes Medvedchuk's role in directing the influence operation through Voice of Europe. This is followed by details of the role that Marchevskyi played in the operations of the organization, however, this official description does not include the financial records behind the allegations.

Jacques Baud as a comparator

Baud's December 2025 entry serves as an interesting contrast. It emphasizes media appearances and an example of a conspiracy theory, but explains his own behavior through acts or policies by the Russian government. There is less detail provided regarding the relationship behind such attribution. His challenge raises questions concerning the criterion, substantiation and procedural rights, although the published pleas do not prove the merits or the outcome of those claims.

The comparison shows the need for more detailed reasons provided to the public, although there is no evidence presented of which judicial outcomes are more probable.

5. From Designation to practical effects

The evidence of operational effects is less conclusive. Research combining leaked Social Design Agency material with Meta's advertising library detected approximately 8,000 Doppelganger advertisements between August 2023 and October 2024. It estimated expenditure of about $330,600 by applying costs observed in 2022. This figure is based on assumptions while the dataset itself has detection and geographic limits. The advertisements appeared after the agency's July 2023 designation under the Ukraine territorial-integrity regime, which demonstrated ongoing ability to distribute despite prior sanctions, without proving the impacts of the subsequent listings.

Voice of Europe statement shows the limits of assessing operational effects from official sanctions announcements. Czech authorities confirmed that the national sanctions imposed in March 2024 included asset freezes. Their statement provides no asset values or evidence measuring the resulting financial constraint. Therefore, it documents the restrictions without establishing their operational effect.

These findings raise certain doubts regarding enforcement and also show some shortcomings of evidence for evaluating sanctions. The operation may continue despite some financial losses, but the asset freeze does not create a situation of deterrence. This is proven by having evidence that sanctions affected the decision to cut down on activities.

6. Policy recommendations

Recommendation 1: Clarify the conduct and attribution threshold

Lead: Council, with proposals from the High Representative and Commission as appropriate.

The Council should explain how manipulation, government attribution and threats to protected interests relate under the listing criteria. Under the existing framework, individual reasons should show how the actor's conduct satisfies each relevant element. Restoring an express coordination requirement merits consideration, provided its definition accommodates decentralized operations and distinguishes participation in a campaign from shared opinions. Any amendment should address the Decision and Regulation together.

Recommendation 2: Strengthen reasons and review supporting evidence

Lead: Council, drawing on EEAS and Member State evidence

Statements of reasons should include the contribution of each party and evidence supporting financial, operational and institutional relationships. If the explanation involves inference from context, the Council must set out how the relevant facts lead to the inference. Explanations that are meaningful and not confidential must be offered wherever possible to aid understanding of the conduct by the listed individual.

The next periodic review should evaluate substantiation, current responsibility and proportionality. Where public reasons leave the actor's contribution unclear, the Council should examine whether the supporting evidence resolves that gap and revise the explanation accordingly. Listings that the evidence cannot support should be removed.

Recommendation 3: Investigate services sustaining listed operations

Lead: national competent authorities, supported by the Commission

Commission guidance could support a more consistent approach to advertising, hosting and payment transactions involving listed actors. Documented cases of continued access warrant examination by national competent authorities to establish the beneficiary, jurisdiction and applicable exceptions before determining a breach. Cases involving several Member States would also provide a basis for closer cooperation between the responsible authorities.

Recommendation 4: Assess operational effects separately from deterrence

Lead: EEAS, working with the Commission and national competent authorities

A common reporting approach would help in assessing the impacts of sanctions. Reports should include information about the value of assets frozen, disruption of service and installation of alternative structures if data allow. An assessment of impacts would need to take into consideration the nature of the sanctions, their previous application and future designations, as

well as any other enforcement measures that could account for the impact. Deterrence must be proven through behavioral change.

Conclusion

The framework can provide a legally robust response when evidence substantiates individual responsibility and the Council respects procedural rights and proportionality. The cases offer qualified public support for network attribution, but weaker grounds for assessing practical effects. More specific reasons, substantive review and enforcement data would improve both the defensibility of designations and the evidence available to judge their contribution against FIMI.

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