

Dear Ofcom,

Complaint concerning X Corp

Following the formal complaint submitted on our behalf by Brett Wilson LLP on 26 November 2025 (Ref: GLP/3200), we at Good Law Project and HOPE not hate are writing to provide further evidence regarding X Corp's failure to comply with its statutory duties under the Online Safety Act 2023 (OSA). As foreshadowed in that initial correspondence, our ongoing investigation has now identified additional grounds for concern regarding "Priority Illegal Content," specifically relating to (a) the promotion of terrorism and (b) the incitement of violence, including threats to kill. This supplemental evidence reinforces our belief that X is failing to effectively manage or mitigate the risk of its platform being used for the commission of priority offences, and we request that OFCOM considers these further findings as part of a formal investigation.

The statutory framework

Since 17 March 2025, the OSA has placed a number of legal duties on the operators of 'user-to-user' services such as X to take steps to ensure that their platforms are minimising the risk of online harm.

X's duties under the OSA include:-

- Having effective content and reporting systems/processes that allow users to easily report illegal content (section 20 OSA) and an effective complaints procedure (section 21 OSA).
- Preventing individuals from encountering Priority Illegal Content (section 10(2)(a) OSA).
- Effectively mitigating and managing the risk of the service being used for the commission or facilitation of a 'Priority Offence' (section 10(2)(b) OSA).
- Effectively mitigating and managing the risks of harm to individuals (section 10(2)(c) OSA).
- Using proportionate systems and processes designed to minimise the length of time for which any Priority Illegal Content is present (section 10(3)(a) OSA).
- Operating a service using proportionate systems and processes designed to ensure that any Priority Illegal Content is swiftly taken down when it is notified of its presence or becomes aware of it in any other way (section 10(3)(b) OSA).

Illegal content is defined by the OSA as "content that amounts to a relevant offence" (section 59 OSA). The OSA categorises illegal content as either Priority Illegal Content or "Non-designated Illegal Content". Priority Illegal Content refers to offences listed in Schedule 5 of the OSA (terrorism offences), Schedule 6 of the OSA (child sexual abuse offences) and Schedule 7 of the OSA (a range of other offences).

Part 1: Terrorism Material

Following our complaint of 26 November 2025 focused on the incitement of racial and religious hatred, Good Law Project has conducted a subsequent exercise specifically targeting the presence of terrorism content on X. This follow-up work was designed to assess X's compliance with its duties under the Online Safety Act 2023 regarding Priority Illegal Content as defined in Schedule 5, which sets out the relevant terrorism offences. Some of the specific offences listed include being a member of a proscribed organisation, inviting support for a proscribed organisation, expressing opinions or beliefs that are supportive of a proscribed organisation, as well as the broader encouragement of terrorism and the dissemination of terrorist publications.

The posts were identified for us by experts in the field of counter terrorism, who were able to provide important context and meaning to the posts enabling us to identify and report posts that appear to violate these statutory requirements, testing the platform's proactive removal and complaint-handling efficacy.

By incorporating this expert analysis, we aim to provide OFCOM with a verified dataset that demonstrates how terrorism-related content—often involving the promotion of prohibited organizations or the incitement of violence—continues to persist on the platform despite being flagged through X's formal reporting channels.

In the United Kingdom, the proscription process under the Terrorism Act 2000 focuses exclusively on banning specific organizations that the Home Secretary believes are "concerned in terrorism." As of late 2025, there are approximately 84 international terrorist groups, the vast majority being Islamic groups, alongside 14 Northern Ireland-related organizations on this list. This regime is relatively narrow, as it targets only groups rather than individuals, who are instead held accountable through criminal offences linked to their association with these banned entities.

In contrast, the United States employs a much broader and more complex designation framework. While it maintains a list of Foreign Terrorist Organizations similar to the UK's proscription list, the US also utilizes extensive sanction regimes which allow for the designation of not only organizations but also thousands of individual terrorists and their supporters as 'Specially Designated Global Terrorists'. This allows the US to target the financial and logistical networks of individuals directly, resulting in a significantly larger volume of designations compared to the UK's group-centric approach.

We want to make it very clear that we do not claim that the posts reported and contained in this letter are a representative sample of terrorist activity around the world, both by proscribed organisations and others. Instead, our aim was to understand how X deals with terrorist content when posts are raised through their moderation process. To that end our list of posts carries the institutional preferences of the UK proscription regime.

From late November to late December Good Law Project reported over 120 posts on X that our experts had identified as terrorist content. 30 posts related to UK proscribed organisations, with the remaining posts relating to US proscribed organisations. Of the 30 posts submitted for moderation the post was removed in only 1 instance. Good Law Project also reported 95 posts that related to organisations that were proscribed the US and/or on the UK sanctions list. Of the 95 posts submitted for moderation the posts were only removed in 7 instances.

This represents a moderation rate of just 3.33% where it related to UK proscribed organisations and 7.3% when related to US proscribed and UK sanctioned organisations.

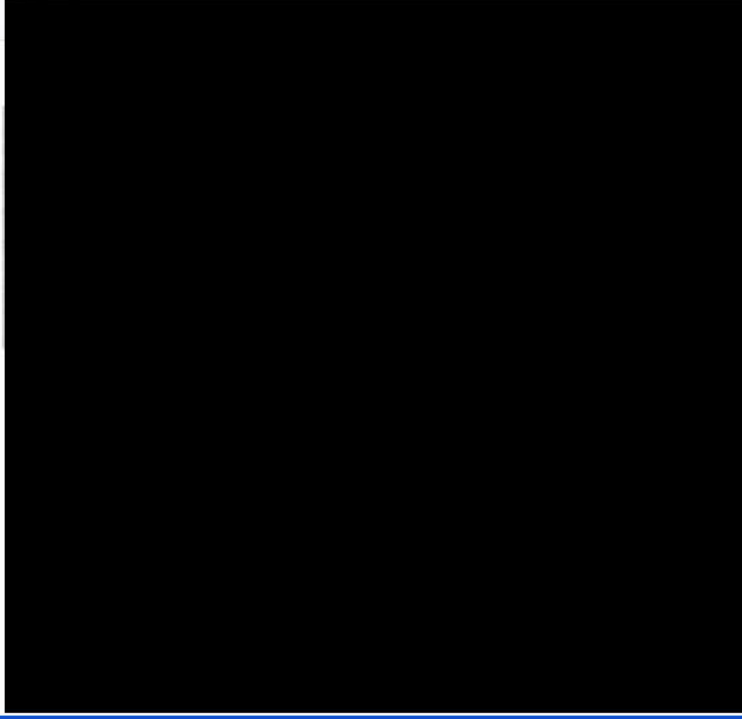
The material that we reported to X was divided into 3 tiers reflecting different aspects of the terrorist content that appears on the platform.

Tier 1 – Accounts that claim to be official accounts of proscribed organisations

Example 1: <https://x.com/██████████>, Reported 2nd December 2025, **Status: NO MODERATION ACTION TAKEN**

This account, which has over 71k followers, clearly states in its bio that it is the official account of the deputy general secretary of Hezbollah, a UK proscribed organisation.¹ The account was reported on 2nd December 2025 but remains active. Given the nature of the account and the posts it ██████████ we believe it is in breach of Schedule 5 1(a), (b), (c), (m), (p) & 3(a), (b) of the Online Safety Act 2025

¹ <https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2/proscribed-terrorist-groups-or-organisations-accessible-version>



Example 2: [https://x.com/\[REDACTED\]](https://x.com/[REDACTED]) Reported 2nd December 2025, Status: NO MODERATION ACTION TAKEN

The account, which has over 258k followers, uses photos of Hasan Nasrullah who was leader of Hezbollah, a proscribed UK organisation, in its profile and cover photos. The account is dedicated to publishing words of Nasrullah rhetoric and speeches. Given the nature of the account and the posts it makes, we believe it is in breach of Schedule 5 1(b), 1(c) & 3(a), (b) of the Online Safety Act 2025. The account was reported on 2nd December 2025 and remains online.



Tier 2 – Accounts that claim to be affiliated to proscribed terrorist organisations

Example 1: <https://x.com/hasanhamzehh/status/1720431774587662569> Reported 5th December 2025, **Status: NO MODERATION ACTION TAKEN**

The photo in this post is taken from the studios of the sanctioned entity al-Manar TV for its role as the official media platform of the UK proscribed terrorist organisation Hezbollah. The photo shows the former leader and US-sanctioned terrorist Hasan Nasrallah. The caption says: "We belong to this man.. he is the one who compiles honesty, love, and presence to this extent!! #Master_of_Resistance , #Master_of_firmness_and_wisdom"

Hasan Hamzeh, who owns the account, declares in the bio that he works as a journalist and TV presenter at the sanctioned AL MANAR TV, which is the official media output for the proscribed terrorist organization Hezbollah.

The post was reported on 5th December 2025. Given the nature of the account, the fact that it remains active, and the posts it makes, we believe it is in breach of Schedule 5 1(a), 1(b), 1(c) of Online Safet Act 2025.

x.com/hasanhamzehh/status/1720431774587662569

← Post

 **hasan hamzeh**
@hasanhamzehh

Show translation

نحن محسوبين على هيدا الرجل .. وهو الذي راكم صدقا وحبنا وحضورا الى هذا الحد!!
#سيد_المقاومة
#سيد_الحزم_والحكمة



1:24 PM · Nov 3, 2023 · 3,933 Views

← Post

 **hasan hamzeh**
@hasanhamzehh



Translated from Arabic [Show original](#)

We're counted among this man .. and it's he who has amassed, with such sincerity and love and presence, to this extent!!

[#سيد_المقاومة](#)

[#سيد_الحزم_والحكمة](#)

Rate this translation:  



1:24 PM · Nov 3, 2023 · 3,938 Views

Tier 3 – Single posts from individual accounts whose content falls within the definition of terrorism content

Example 1: <https://x.com/>  Reported 12th December 2025, **Status: NO MODERATION ACTION TAKEN**

A post containing a video of forced confessions of an Israeli citizen kidnapped in Iraq by a militia group. The post is, we believe, in breach of Schedule 5 section 3(a) & (b). It was reported on 12th December 2025 but remains active.

x.com/katab_fulan/status/1724143545290777017

← Post

Reply

كتب فلان
@katab_fulan

...

Show translation

اعترافات الجاسوسة

الصهيونية من اصل روسي اليزابث تسوركوف

التي اخترقت التيار المقتداني واعتقلت من قبل احد فصائل المقاومة العراقية

#ابناء_الجاسوسة



x.com/katab_fulan/status/1724143545290777017

← Post

Reply

كتب فلان
@katab_fulan

...

Translated from Arabic Show original

Confessions of the Spy

Zionism of Russian origin Elizabeth Tsurkov

Who infiltrated the Jund al-Imam current and was arrested by one of the Iraqi resistance factions

#ابناء_الجاسوسة

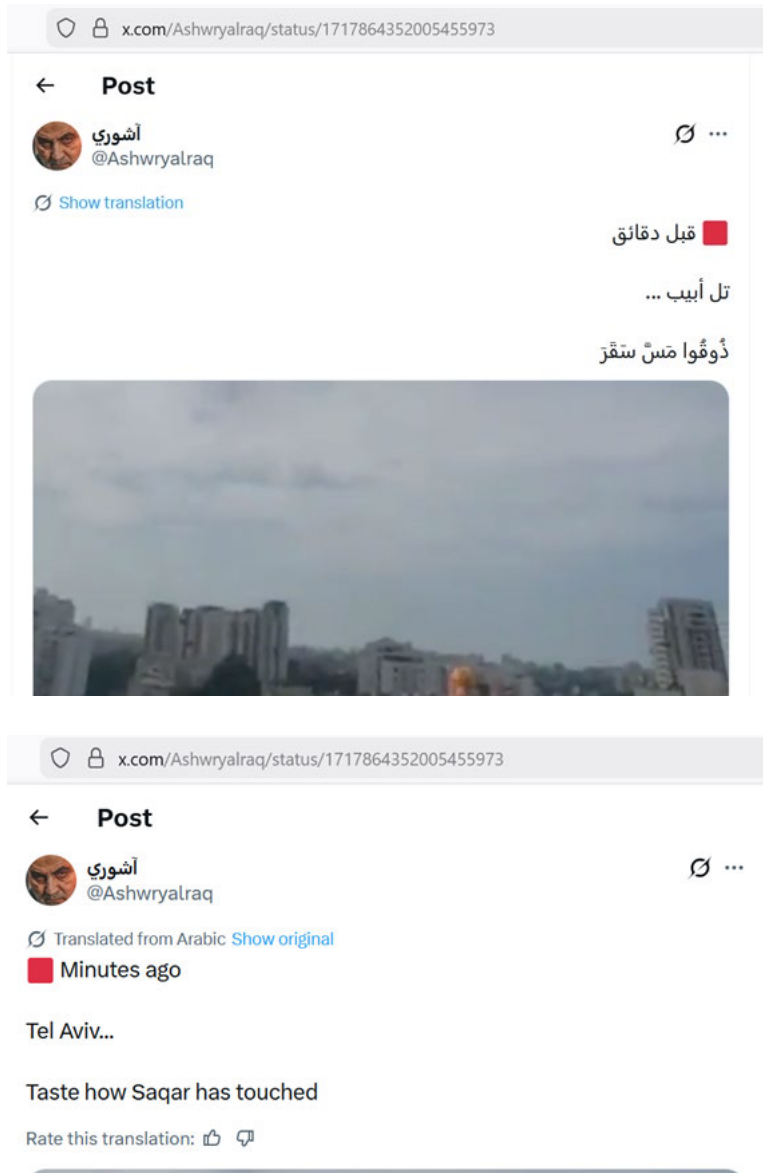
Rate this translation: 👍 👎



Example 2: <https://x.com/████████████████████> Reported 12th December 2025, Status: NO MODERATION ACTION TAKEN

A post containing a short video of a rocket attack against a civilian building in Israel. The caption says, "Taste the pain of fire".

The post is, we believe, in breach of Schedule 5 3(a) & (b) of Online Safety Act 2025. It was reported on 12th December 2025 and remains active.



Of the 96 posts that related to US proscribed organisations and individuals the content was only moderated 7 instances. Even though X Corp is not strictly obligated under US law to remove content related to US-designated terrorist organizations or individuals, its failure to moderate these posts after being proactively notified is revealing. By choosing to allow such content to remain online despite receiving expert evidence of its nature, X demonstrates a policy of inaction rather than an inability to moderate. This pattern of behaviour strongly suggests that X is not merely benefiting from the broad liability shields of the US legal system, but is actively opting to ignore its safety responsibilities, even when provided with clear notice of content that is clearly promoting terrorism that poses a material risk of harm to users in the UK.

Part 2 - Incitement to violence material

At Good Law Project's request, HOPE not hate identified a sample of 120 posts (January 2026) live on X that it considered constituted "incitement to violence" as per the UK OSA's definition, with a specific focus on threats of violence or harassment against groups with protected characteristics.

Each item in the sample was scored by severity (where 5 was the most inciteful). All posts were located within threads from accounts with significant followings, meaning the material was widely circulated and viewed by hundreds of thousands, if not millions, of users. Many of the sampled posts originated from or were amplified by "Blue Tick" accounts, which the platform's algorithm prioritises in "For You" feeds.

The content sampled frequently exhibited calls for targeted violence against minority communities, dehumanising rhetoric that serves as a precursor to physical harm, and evidence of "spawning", where one inflammatory post triggers a wave of even more extreme replies that remain unmoderated.

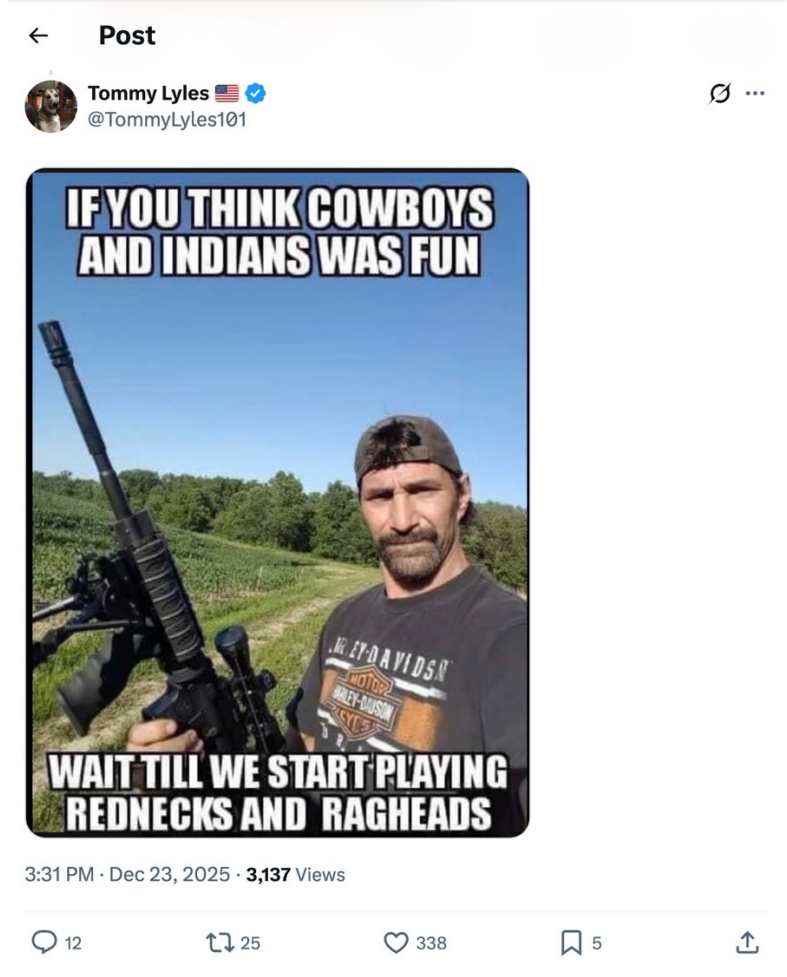
To assess X's proactive moderation efforts, each of the 120 posts was revisited 30 days after collection to determine if it was still live. Of the total, two returned as "page not found", one as "page doesn't exist anymore", one post had been deleted, and one account suspended - leaving 115 still accessible, and a proactive moderation rate of just 4%.

To assess reactive moderation, a subset of 35 posts (category 4-5) was reported via a dummy account by the Good Law Project during Jan-Mar 2026 to the platform's inbuilt flagging service. At the time of writing, of these reported posts, seven were geo-blocked for the UK, 11 remained with no action taken, one had the original post removed and 15 were classified as not breaching the threshold for incitement. This represents a reactive moderation rate of just 20% - with local geo-blocking the only action taken by the platform.

We set out below some examples of the 80% of posts that remain unmoderated or were deemed not to meet the platform's moderation threshold, even after reporting. A full appendix will be sent with this letter.

Example 1: [https://x.com/\[REDACTED\]](https://x.com/[REDACTED]) 20, Reported 13 February 2026. **Status: NO MODERATION ACTION TAKEN**

This account has 3,678 followers and this post was viewed 3,137 times. The post is an image of poster holding an assault rifle suggesting violence and using derogatory racist language.



Example 2: [https://x.com/\[REDACTED\]](https://x.com/[REDACTED]) Reported: 13 Feb 2026. **Status: NO ACTION TAKEN.**

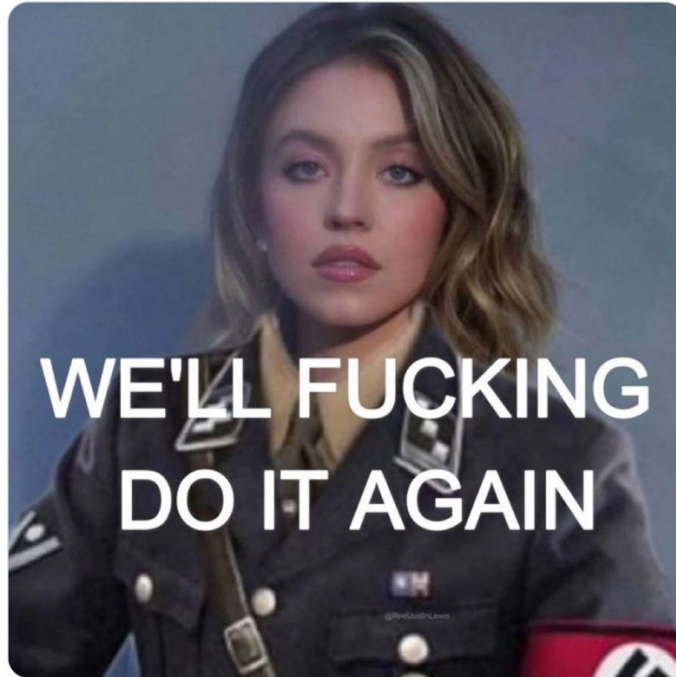
This account has 358.9k followers and this post was viewed 51k times. The post promotes violent Nazi imagery with racist “whites are done” messaging.



Machiavelli  @TheRISEofROD · Dec 24, 2025



Whites are done



174

495

7.1K

51K



Example 3: [https://x.com/\[REDACTED\]](https://x.com/[REDACTED]) Reported
17 Feb 2026. **Status: DOES NOT MEET INCITEMENT THRESHOLD**

This account has 2,879 followers and this post was viewed 106 times. Image showing minors holding knives and hammer with encouragement by account holder to 'like'.

← Post



Chinchilla Haton Linda ✓
@LindaSunshine66



The eSafety Commissioner says images of a girl defending herself are Islamophobic, and anyone posting them will be prosecuted.

Press ❤️ if you support our girls.



6:11 PM · Sep 28, 2025 · 106 Views

Example 4: [https://x.com/\[REDACTED\]](https://x.com/[REDACTED]) Reported 3 Feb 2026, **Status: NO MODERATION ACTION TAKEN.**

This account has 1,696 followers and the post was viewed 30 times. The post shows video clip showing poster loading a shotgun wearing a crusader costume with the call to action 'We need another'.

← Post



No body
@No_body_atall



We need another



10:07 PM · Dec 21, 2025 · 30 Views



Example 5: [https://x.com/\[REDACTED\]](https://x.com/[REDACTED]) Reported 4 Feb 2026,
Status: **NO MODERATION ACTION TAKEN**

This account has 2,585 followers and the post was viewed 85 times. Advocates for immigrants marching for Palestine to be hanged.

← Post



Intimidator 3 Fan
@masera_L



Deport them immediately or hang them.!!!



5:18 AM · Jan 5, 2026 · 85 Views



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1



7



The case for Regulatory Action

This document presents a further case for Ofcom formally to investigate X in respect of what we say are breaches of the Online Safety Act. Despite the OSA being in force for eight months, no systemic investigation has been opened, and no enforcement has occurred.

Our ongoing testing reveals a disturbing trend: these aren't just "drops in the ocean,". The small sample above is symptomatic of a systemic breakdown that allows terrorism and incitement content to go unchecked on X. This failure goes beyond individual posts; it points to a moderation process that is failing. It raises three critical questions:

- 1. How is content actually moderated?** We need clarity on the underlying criteria to ensure X is moving toward compliance with the UK Online Safety Act.
- 2. Is the system fit for purpose?** Compliance requires more than "whack-a-mole" tactics. We need an immediate overhaul that sets clear, enforceable benchmarks for both AI and human oversight to ensure moderation happens in real-time.
- 3. What is X's genuine commitment to addressing this moderation failure?** At best, its efforts are disjointed and indifferent, allowing incitement and terrorism content to proliferate through neglect. At worst, X is wilfully using weak moderation protocols to undermine the assessments made by Parliament as to the balance to be struck between free speech and other legitimate public policy aims.

We consider that an immediate and comprehensive investigation into X's content moderation practices is essential to ensure compliance with the Online Safety Act and to prevent further systemic harm.

Best Regards

Good Law Project