

# Rules of the Road

## Political Advertising on Social Media in the 2024 U.S. Election

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In 2006, just two years after Facebook was founded, some college students running in student body elections reached out to the young company with an idea: what if it were possible to target campaign messages to college students on Facebook at a specific university using paid ads on the platform?<sup>1</sup> Just like that, the era of online political advertising was born.

What began as a way for college students to get out the vote in a student body election just 18 years ago has exploded into a multi-billion dollar industry in the United States today. A record-breaking \$3.4 billion is projected to be spent on online political advertising in the U.S. this year, a 156% increase over the 2020 election cycle, which set the previous record.<sup>2</sup> While still representing a minority of all political advertising dollars (almost 30%), online platforms have gobbled up an increasing share of advertising spending each federal election cycle

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1 Harbath, K., & Fernekes, C. (2022). *A Brief History of Tech and Elections: A 26-Year Journey* | *Bipartisan Policy Center*. <https://bipartisanpolicy.org/report/history-tech-elections/>

2 Mehta, C. (2024, January 11). US political ad spending to soar in 2024 with TV media the biggest winner—Report. *Reuters*. <https://www.reuters.com/world/us-political-ad-spending-soar-2024-with-tv-media-biggest-winner-report-2024-01-11/>

since 2008.<sup>3</sup>

Political campaigns now invest heavily in their online presence and have a clear interest in growing their audience – and targeting constituents – using paid advertising. And for good reason: digital political advertising offers advertisers more options than they’ve ever had before. They can use a combination of media (images, video, audio, and text) and place these messages in a variety of locations (in search results, on websites as banners or pop ups, in mobile apps, and in social media feeds where users can interact with and share them organically), while having greater control over the reach and targeting of their messages than is available on TV, radio, or traditional print media. The advent of generative AI further lowers the barriers to easily target and personalize political ads.

But with new opportunities have come new risks. For a decade, online political advertising managed to stay out of mainstream news while gaining traction with large and small political campaigns alike. But in 2016, then presidential candidate Donald Trump’s extensive, high-profile use of online advertising and claims of online foreign influence—as well as other high-impact geopolitical events tied to strategically targeted online political advertisements—led to Congressional and intelligence agency investigations into the tools and services that technology companies were offering political advertisers. Since then, social media companies have faced consistent pressure to account for how they collect and process user data — especially to target ads — including congressional hearings at which their corporate leaders were interrogated about their policies, their enforcement approaches, their efforts to prevent foreign malign influence, and their strategies for protecting users from harmful mis- and disinformation. Companies have responded by restricting the types of personal characteristics that advertisers can use to target political ads, implementing residency and authenticity requirements to prevent foreign interference, and creating advertising databases containing all political ads served on their platforms to provide greater transparency into the paid content users see.

Alongside these efforts, legislators and regulatory agencies around the world have also sought to regulate political advertising. New laws have popped up in the European Union (EU), Canada, Singapore, Brazil and elsewhere. In the U.S., despite many congressional hearings, subpoenas, and investigations, federal legislators have failed to agree on an approach, though some states, like Washington and New York, have enacted their own regulations on political advertising.

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3 In 2008, just \$22.25 million was spent on digital political advertising – Nott, L. (2020). Political Advertising on Social Media Platforms. *Human Rights Magazine*, 45(No. 3: Voting in 2020). [https://www.americanbar.org/groups/crsj/publications/human\\_rights\\_magazine\\_home/voting-in-2020/political-advertising-on-social-media-platforms/](https://www.americanbar.org/groups/crsj/publications/human_rights_magazine_home/voting-in-2020/political-advertising-on-social-media-platforms/)

This increased to \$159 million in 2012, and \$1.4 billion in 2016. – Fowler, E. F., Franz, M. M., & Ridout, T. N. (2020). Online Political Advertising in the United States. In J. A. Tucker & N. Persily (Eds.), *Social Media and Democracy* (pp. 111–138). Cambridge University Press. <https://www.cambridge.org/core/books/social-media-and-democracy/online-political-advertising-in-the-united-states/98F09A1F61A67819A70C22920BE4674D> [perma.cc/PS4K-Z3GH]

Meanwhile, social media companies' political advertising policies have continued to evolve. The insurrection on January 6th, 2021 (during which supporters of then-President Trump invaded the U.S. Capitol in an attempt to disrupt the formal certification of the 2020 election), the onset of the Ukraine and Israel-Gaza wars, the emergence of generative AI, and widespread layoffs across the tech sector are just a few of the major developments that have shaped online platforms' current political advertising policies.

This brief seeks to demystify how social media platforms define and govern online political advertising in the United States, specifically focusing on the ways in which policies at seven different companies (Google's YouTube, Meta, Microsoft's LinkedIn, Reddit, Snap, TikTok, and X (formerly Twitter)) have changed in the last four years.<sup>4</sup> We review each company's policies in depth, identifying 13 different components of these policies, and highlight areas where policies have changed since 2020 and 2022. We then compare these policies and isolate major trends across the industry.

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4 The initial scope of this report also included Truth Social, which—according to its website—hosts political advertisements. However, the company does not provide public information about its policies or enforcement mechanisms, and did not respond to our outreach efforts. As a result, we do not include Truth Social in our primary findings, though we discuss the company's stance toward governance of political advertising in the Analysis section.

# Key Findings

Our analysis of major social media companies that allow political ads in the U.S. – Google/YouTube, Meta, Snap, Reddit, and X (formerly Twitter) – finds that:

- 1. Definitions of “political advertisements” vary widely.**
  - There is no standard definition of “political ad” across the five platforms. For some, political ads are limited to ads about elections (Google) while others include a wider set of sensitive political issues (such as social issues like climate change and abortion rights). These differences could have major implications for the transparency of advertising on a given platform, as only ads that fall within a platform’s definition of “political advertising” are included in public ad repositories.
- 2. Advertiser verification<sup>5</sup> is largely universal.**
  - All companies required prospective political advertisers to verify their identity, ensuring that only U.S.-based advertisers can purchase U.S. political ads. But the means of verification and the required documentation differ.
- 3. Ad transparency repositories differ in form and function.**
  - These repositories catalog key information about the political ads—who is placing ad buys, what the ads say, who is being targeted, and the potential reach of the ads.
  - All companies provided some type of ad repository, but in varying formats (e.g., a web-based tool or a csv file) and varying accessibility (e.g., whether keyword search of the ad creative is provided).
- 4. “Paid for by” disclosures are the rule, with one major exception.**
  - Four companies require advertisers to disclose who purchased an ad. X (formerly Twitter) was the only company we interviewed that does not require “Paid for by” disclosures on ads. The rationale is unclear.
- 5. Targeting restrictions are common.**
  - While social media companies provide a range of targeting options in their ad suite, they typically reduce the availability of certain targeting criteria for political ads.
  - All companies employed some type of restriction, but the restrictions varied from company to company.
- 6. Ads pause or blackout periods are rare.**
  - Most companies do not pause or prohibit (blackout) political advertising around Election Day in the United States. Meta is the only company that pauses new political advertising during the final days before Election Day. While Meta and Google have both prohibited political advertising following Election Day in years past, neither will do so this year.

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5 Advertiser here refers to the person or organization placing the ad buy, which could be a campaign or campaign employee, or a consultant or contractor.

Our analysis of major social media companies that do not allow political ads – LinkedIn and TikTok – finds that:

1. **Definitions of “political advertising” tend to be broader to give the companies more leeway to decide what is political. However, neither company prohibits social issue ads.**
2. **Both companies cited political ads’ comparatively high compliance and moderation costs as well as what users want from their apps as reasons for prohibiting political ads.**

## What’s new in 2024

Ahead of the 2024 U.S. election cycle, several social media companies made significant updates to their political advertising policies. Some of the key trends we have identified are:

1. **Generative AI disclosures:**
  - Several companies (Google/YouTube, Meta, Reddit) implemented new policies requiring political ads containing AI-modified or AI-generated content to include text disclosures.
  - The wording of generative AI disclosures varies across companies. Some companies provide a disclosure template, while others require that advertisers create the disclosure themselves.
  - Some companies are actively scanning for use of generative AI, and adding a label if they deem it necessary.
2. **Bans on deceptive synthetic or manipulated media:**
  - All companies prohibit political ads that include synthetic or manipulated content that is false or misleading. If such an ad is identified, platforms will remove it.
  - Often these policies were in place previously to address non-AI manipulation (e.g., slowing down a video, cropping a photo) and have been updated to explicitly refer to generative AI.
3. **Loosening of prohibitions on election denial in 2020:**
  - Two companies (X and Meta) made changes to their policies or enforcement prohibiting election denial in political ads. X changed its civic integrity policy and announced it no longer applies to false claims about the outcome of the 2020 U.S. election, and reversed a previous prohibition on political advertising. Meta revised its policy on election denial, allowing ads that call into question the outcome of past elections (but not upcoming or ongoing elections). Google also removed a ban on organic content containing 2020 election denial but maintained a prohibition on this content in ads.
4. **Rules exempting some content from political ads policies have changed:**
  - Exemptions allow certain advertisers to run some types of political ads without disclosing them and placing them in an ads database.
  - Since 2020, Reddit has exempted “get out the vote” ads, and Meta exempted social issues ads selling commercial products. Google, in contrast, has removed its exemptions for commercial products and news organizations.

Company	Social media service(s)	Monthly active users (in millions)	Market capitalization (in billions)
ByteDance	TikTok	1,582	n/a
Google (Alphabet)	YouTube	2,504	1,960B
Meta	Facebook, Instagram	Facebook: 3,065 Instagram: 2,000	1,253.23B
Microsoft	LinkedIn	300	2,970B
Reddit	Reddit	1,021	8.89B
Snap	Snapchat	800	14.18B
X (formerly Twitter)	X	611	n/a



**Table 1. Social media companies and services evaluated in this report**

Data sources for monthly active users in 2024: [Facebook](#), [Instagram](#), [YouTube](#), [Snapchat](#), [X](#), [TikTok](#), [Reddit](#), [LinkedIn](#).

Data sources for market capitalization (current as of August 6, 2024): [Meta](#), [Snap](#), [Reddit](#), [Google](#), [Microsoft](#).

## About this report

### Company selection

This report analyzes U.S. political advertising policies of seven social media companies: Google’s YouTube, Meta, Microsoft’s LinkedIn, Reddit, Snap, TikTok, and X (formerly Twitter). We selected this group of companies, each of which has a large U.S. user base, in order to provide a broad overview of online political advertising policies in the U.S. To fully understand the landscape, we included two social media platforms — LinkedIn and TikTok — that do not allow political ads.<sup>6</sup> We analyzed these companies’ approach to political ads across the 2020, 2022, and 2024 political campaign cycles in the United States to understand how online services have changed their political ad policies over time.

In addition to these seven companies, we also sought to include Truth Social, which is owned by former president — and 2024 Republican nominee — Donald Trump. While Truth Social has a much smaller

6 McClain, C., Anderson, M., & Gelles-Watnick, R. (2024). *How Americans Navigate Politics on TikTok, X, Facebook and Instagram*. Pew Research Center. <https://www.pewresearch.org/internet/2024/06/12/how-americans-navigate-politics-on-tiktok-x-facebook-and-instagram/> [perma.cc/P69F-8FFE]

user base than the other selected companies, its explicit positioning as a conservative “alternative” to mainstream platforms presents an illustrative contrast. However, we found very little publicly available information to analyze, and did not receive any response to our repeated attempts to contact the company. Consequently, it is excluded from the report findings and summaries of platform policies. Truth Social is discussed in the “Analysis” section of this report.

The companies selected for this study differ significantly from one another in terms of size, user experience, media formats, ownership structure, and platform governance. All these factors influence companies’ approach to political advertising policies and enforcement. It stands to reason that different companies might have different goals or pursue similar goals via different means. Moreover, policies and practices at any given company may change over time, including in response to evolutions in the political and information environment: a policy or enforcement process that is fit for purpose in one election cycle may need to change in a subsequent cycle.

This report is focused on describing company policies and practices and generally does not take positions about their relative merits. In CDT’s view, however, company approaches to political advertising should comply with some basic normative principles:

- Companies should be committed to platform and election integrity.<sup>7</sup>
- Companies should have publicly disclosed policies, communicated at a sufficiently high level to prevent bad actors from using such information to “game the system” yet with enough detail to allow advertisers and voters to understand what is permitted on companies’ services.
- Companies should disclose information about how they enforce their policies.
- When company policies change, companies should explain the impetus for such changes.
- Companies should be willing to engage with civil society, the media, policymakers, and the public about their political ads policies and practices related to election integrity.
- Companies should facilitate researcher access to additional data about political ads that may not be appropriate to share publicly.<sup>8</sup>
- Companies should develop relationships and communication channels with election administrators to ensure users can access accurate and authoritative information about the election and to assist them in running get-out-the-vote campaigns, election PSAs, etc.

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7 CDT has created a comprehensive slate of election integrity recommendations for AI developers that apply to most companies in this report. See <https://cdt.org/insights/brief-election-integrity-recommendations-for-generative-ai-developers/>. [perma.cc/NM4D-VC46]

8 CDT has recommendations for how companies can go about facilitating researcher access to data. See <https://cdt.org/insights/improving-researcher-access-to-digital-data-a-workshop-report/>. [perma.cc/92F5-3BZN]

## Research methods

We pursued two modes of inquiry for this project: (1) desk research to identify and analyze policy pages, press releases, and relevant news coverage and (2) semi-structured interviews with representatives of online services we studied.

### *Desk research*

We identified relevant policies through official company disclosures such as platform policy pages and company blog posts, as well as analysis and insights into enforcement of said policies through press coverage across 13 criteria listed below. For each company, we looked for relevant policies and disclosure around the definition and enforcement of its policies across three campaign cycles: 2020, 2022, and 2024. If a company did not make it easy to access previously enforced policies, we used the Internet Archive's Wayback Machine to identify any changes. We did not conduct any testing of these policies through web scraping, analyzing political ads databases, etc. as this was beyond the scope of this report (such research can be found elsewhere).<sup>9</sup>

### *Company interviews*

Following our desk research, we sought to interview representatives from each of the eight companies whose policies we reviewed. We contacted representatives from the eight companies requesting an interview. Seven agreed to talk with us, while Truth Social did not respond to our outreach. We conducted approximately one-hour, semi-structured, qualitative interviews with representatives from each company between July and August 2024.

Our interview protocol was designed to confirm our understanding of company policies and enforcement practices based on our desk research, and to better understand how and why political advertising policies have evolved over time, including the rationale behind company decision-making. We tailored the interview protocol for each company based on its unique policies and our own open questions following our desk research. Each company received an overview of the interview protocol ahead of time to facilitate interview preparation.

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9 Lesplingart, A., & Pershan, C. (2024). *Full Disclosure: Stress testing tech platforms' ad repositories*. Mozilla. <https://foundation.mozilla.org/en/research/library/full-disclosure-stress-testing-tech-platforms-ad-repositories/>

## Unpacking Political Ads Policies: 13 Criteria

During our desk research and interviews, we used 13 different elements of political advertising policies to structure our analysis:

1. **Political ads definition.** How does the company define political ads? Does it include ads by/about/on behalf of candidates, ads about elections and civic events, and social issues? Or only some of these?
2. **“Paid for by” disclosure.** Does the company require disclosures about who paid for a political ad? How much detail is included in the disclosure?
3. **GenAI disclosure.** Does the company require disclosure for ads that contain content created using generative AI?
4. **Database for ad transparency.** Does the company maintain a database for ad transparency? How long are political ads listed in the database? What data points are included in the database? Who can access the database and how?
5. **Identity verification and authentication.** How does the company verify advertisers’ identity?
6. **Residency and foreign interference.** Does the company require advertisers to reside in the country they are targeting for political ads? How do they ensure compliance?
7. **Targeting restrictions.** Does the company have restrictions on targeting for political ads? Can advertisers target specific demographic groups? Can they input custom parameters up to and including specific people?
8. **Generative AI ads tools.** Does the company offer generative AI tools in its suite of ads tools? If so, are they available for political ads? If the company bars this use case, how is it enforcing this?
9. **Election interference.** Does the company have specific political ads policies against interfering in elections? What are they? What are the consequences for violating these policies?
10. **Ads pause period.** Does the company have an ads pause period for the U.S. election?
11. **Exemptions for media.** Does the company allow some entities — nonprofit organizations, media, etc — to run advertisements that would otherwise be classified as political advertisements without meeting the corresponding requirements (such as identity verification, inclusion of a ‘paid for by’ disclaimer, and archiving the ads in a transparency database)?
12. **Policy enforcement.** How does the platform enforce its policies? Is the process fully or partially automated? Are users notified when their ads violate policy?
13. **Actor-level enforcement.** Does each platform take account-level action for repeat violations of political advertising policies?

# Political advertising landscape

Online political advertising in 2024 has been shaped by many events over the last four presidential elections (2008, 2012, 2016, and 2020). While the focus of this report is how the current landscape has shifted over the last four years, some context setting is necessary.

Today, online services decide whether to host political advertisements based on many different factors. Such advertisements can sometimes offer lucrative financial opportunities for online services: campaigns spent over three times more on placing political ads on online services in 2020 than in 2016.<sup>10</sup> But the decision to host political advertisements comes with public and regulatory scrutiny, as well as increased costs to enforce ad policies. Depending on the ad volume and details of enforcement mechanisms, hosting political ads can even result in a net loss for some platforms.

Online political advertising has evolved over time. In the 2000s and early 2010s, social media platforms would showcase how political campaigns were leveraging their growing online social networks with posts about candidate events and even by hosting presidential debates.<sup>11</sup> The 2016 to 2018 period marked a shift for many online services in how they host and manage political content: from showcasing politicians' outreach via their products to showcasing company policies to mitigate misuse of their products. This reckoning was spurred by growing awareness of state-sponsored influence campaigns on social media platforms, notably Russia's efforts to influence the 2016 Brexit vote and the 2016 U.S. presidential election.<sup>12, 13</sup> The 2018 Cambridge Analytica scandal laid bare the scale of invasive data collection technology companies engaged in to target politically persuasive messages to the public.<sup>14</sup> CEOs of Meta (then Facebook),<sup>15</sup> Google,<sup>16</sup> and X (then Twitter)<sup>17</sup> were brought to testify before Congress to

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10 He, A. (2020, February 12). Digital Political Advertising Forecast for 2019/2020 Presidential Cycle. *eMarketer*. <https://www.emarketer.com/content/digital-political-advertising-to-cross-1-billion-mark-for-2019-2020-cycle> [perma.cc/P7V4-UNCU]

11 Harbath, K., & Fernekas, C. (2022). *A Brief History of Tech and Elections: A 26-Year Journey* | Bipartisan Policy Center. <https://bipartisanpolicy.org/report/history-tech-elections/>

12 Llewellyn, C., Cram, L., Favero, A., & Hill, R. L. (2018). Russian Troll Hunting in a Brexit Twitter Archive. *Proceedings of the 18th ACM/IEEE on Joint Conference on Digital Libraries*, 361–362. <https://doi.org/10.1145/3197026.3203876> [perma.cc/H9ZX-T5VQ]

13 Hall Jamieson, K. (2018). *Cyberwar: How Russian Hackers and Trolls Helped Elect a President: What We Don't, Can't, and Do Know*. Oxford Academic. <https://global.oup.com/academic/product/cyberwar-9780190915810> [perma.cc/6TUM-32DS]

14 Confessore, N. (2018, April 4). Cambridge Analytica and Facebook: The Scandal and the Fallout So Far. *The New York Times*. <https://www.nytimes.com/2018/04/04/us/politics/cambridge-analytica-scandal-fallout.html>

15 Times, T. N. Y. (2018, April 10). Mark Zuckerberg Testimony: Senators Question Facebook's Commitment to Privacy. *The New York Times*. <https://www.nytimes.com/2018/04/10/us/politics/mark-zuckerberg-testimony.html>

16 Wakabayashi, D., & Kang, C. (2018, December 11). Sundar Pichai, Google's C.E.O., Testifies on Capitol Hill. *The New York Times*. <https://www.nytimes.com/2018/12/11/business/sundar-pichai-google-house-hearing.html>

17 Romm, T. (2018, September 4). Facebook's Sheryl Sandberg, Twitter's Jack Dorsey to face questions from Congress about Russia and censorship this week. *Washington Post*. <https://www.washingtonpost.com/technology/2018/09/04/facebooks-sheryl-sandberg-twitters-jack-dorsey-face-questions-congress-about-russia-censorship-this-week/>

answer for what, in the eyes of many policymakers, amounted to misuse of their platforms.

From the 2018 cycle onward, social media companies expanded political ads policies to promote election security and overall transparency. Several companies introduced ad repositories (also known as “libraries”) so that researchers and civil society could study the digital ads ecosystem. These repositories provide transparency into important elements of the ads on their platforms such as creative elements, advertiser name and contact information, and targeting details. Prior to 2018, social media companies had not released information on their political advertising business.<sup>18</sup>

Companies also began restricting how political ads could be targeted, to reduce the ability of advertisers to unfairly target certain voter demographics. In 2019, Google removed advertisers’ ability to target ads based on public voter records or political affiliations (such as “left-leaning” or “independent”).<sup>19</sup> Meanwhile, several companies decided to reduce their platforms’ focus on political ads altogether. In 2019, X (then Twitter) banned political ads — a decision that has since been reversed.<sup>20</sup> In June 2020, Mark Zuckerberg, CEO of Meta, announced the ability for users to “turn off seeing political ads” alongside other changes to the platform.<sup>21</sup>

In 2020, in part due to the stay-at-home orders enacted to contain the COVID-19 pandemic, political campaigns were even more dependent on advertising across TV, radio, and online services than in previous elections, spending 30% more than the \$6.7 billion projected by advertising groups.<sup>22</sup> This spike in political advertising complicated companies’ efforts to enforce their policies. A central challenge for companies was drawing lines between organic political speech and political advertisements on the one hand, and between political and non-political ads on the other, at a scale and speed that all but dictated the use of error-prone automated systems. Civil society and the media have called for companies to boost human review of advertisements and oversight of their own policy enforcement and for legislators to regulate and enforce political ad rules in the digital age.<sup>23, 24</sup>

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18 Fowler, E. F., Franz, M., & Ridout, T. N. (2018, December 3). The big lessons of political advertising in 2018. *The Conversation*. <http://theconversation.com/the-big-lessons-of-political-advertising-in-2018-107673> [perma.cc/2YYV-JHA8]

19 Spencer, S. (2019, November 20). *An update on our political ads policy*. Google. <https://blog.google/technology/ads/update-our-political-ads-policy/> [perma.cc/6WPV-DF8U]

20 Woollacott, E. (2023, August 30). X Lifts Ban On Political Ads. *Forbes*. <https://www.forbes.com/sites/emmawoollacott/2023/08/30/x-lifts-ban-on-political-ads/> [perma.cc/MUD4-BMHV]

21 Zuckerberg, M. (2020, June 16). Historic Facebook campaign will boost voter registration, turnout and voices. *USA TODAY*. <https://www.usatoday.com/story/opinion/2020/06/17/facebook-voter-campaign-strengthen-democracy-mark-zuckerberg-column/3191152001/> [perma.cc/PLF8-ZYA9]

22 Homonoff, H. (2020, December 8). 2020 Political Ad Spending Exploded: Did It Work? *Forbes*. <https://www.forbes.com/sites/howardhomonoff/2020/12/08/2020-political-ad-spending-exploded-did-it-work/> [perma.cc/E3F4-AZPY]

23 Karr, T. (2024, April 23). *Civil-Society Leaders Assess Big Tech Election-Integrity Efforts in Momentous Election Year*. Free Press. <https://www.freepress.net/news/press-releases/civil-society-leaders-assess-big-tech-election-integrity-efforts> [perma.cc/FGZ3-83MP]

24 Fischer, S. (2019, November 23). Political ads are tricky to define in digital era. *Axios*. <https://www.axios.com/2019/11/23/what-is-a-political-ad>

Two years later, factors including an economic downturn and subsequent layoffs in the tech sector — which notably affected Trust & Safety (T&S) headcounts — dampened hopes for strengthened policy enforcement. Almost 200,000 workers at U.S.-based technology companies were laid off between 2022 and 2024.<sup>25</sup> People working in Trust & Safety were particularly affected, further weakening companies' oversight mechanisms with respect to political advertisements.<sup>26</sup> Trust & Safety policy enforcement was increasingly outsourced to third-party service providers,<sup>27</sup> with over \$7.7 billion in venture capital injected into the T&S software market between 2019 and 2023.<sup>28</sup>

In addition to economic factors, the political advertising landscape has been shaped by the politicization of social media companies' content moderation efforts, including two main flashpoints: COVID-19 misinformation and false claims that the 2020 U.S. general election was "stolen" (the "Big Lie"). Social media companies were faced with the unpopular and inherently error-prone task of moderating user and advertiser content pertaining to these divisive topics. Conservative backlash ensued at both the federal and state levels. At the federal level, the House Judiciary Committee Select Subcommittee on the Weaponization of the Federal Government launched legal campaigns against researchers who study election denialism, substantially chilling such work. Notably, Stanford University quietly shuttered its Internet Observatory this year—a leader in the social media research space. At the state level, Missouri, Louisiana, Texas, and Florida launched legal challenges to how social media companies conduct content moderation. Missouri and Louisiana sued executive branch agencies and officials, claiming that the federal government illegally pressured social media companies to censor conservative speech. Meanwhile, Texas and Florida passed laws to force social media platforms to host content that they would otherwise remove with the express intent of increasing conservative speakers' access to these platforms. While the legal status of these laws has been contested — including in three cases heard by the U.S. Supreme Court — the legal challenges have had major ramifications on federal agencies' ability to share foreign intelligence threats with social media platforms.

Another change from 2020 is the emergence of broadly accessible generative AI. Since its launch in late 2022, ChatGPT has provided broad access to the general public to highly capable machine learning tools, raising concerns about the role of generative AI in political campaigns. Research has validated fears that generative AI tools' ability to create highly realistic and potentially deceptive content related to elections and candidates could be

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25 Tech Layoffs: US Companies With Job Cuts In 2023 and 2024. (2024, August 9). *Crunchbase News*. <https://news.crunchbase.com/startups/tech-layoffs/> [perma.cc/AFD3-GQRH]

26 Field, H., & Vanian, J. (2023, May 26). Tech layoffs ravage the teams that fight online misinformation and hate speech. *CNBC*. <https://www.cnbc.com/2023/05/26/tech-companies-are-laying-off-their-ethics-and-safety-teams.html> [perma.cc/38T6-ZSLQ]

27 Ibid.

28 *Trust & Safety Market Research Report: A comprehensive business case for investment in the Trust & Safety industry*. (2024). Duco. <https://ducoexperts.com/tsreport> [perma.cc/Y2U8-UYME]

politically persuasive.<sup>29</sup> As social media companies integrate generative AI tools into their advertising suites, advertisers can micro-target niche online audiences and create hyper-personalized ads with ease and at scale.<sup>30</sup> Online services must now consider how their policies apply to generative AI technology that allows campaigns to easily create, translate, and target political advertisements, while also making it easier to create and spread harmful or defamatory messages and even depict political figures engaging in activities that never happened.<sup>31, 32, 33</sup> Online services will also have to grapple with related free speech questions as they find a balance between protecting free political discourse while preventing the spread of AI-augmented misinformation.

What's clear is that companies will have to make judgements about what is "truthful", "political", and permissible under their political ads policies, whether or not they decide to host political ads. Most states have their own political advertisement laws, further complicating the legal landscape.<sup>34</sup> Proposed federal legislation calls for political advertisements to include accessible and user-friendly AI disclosures to address the threat of deceptive AI-generated content.<sup>35</sup> Several companies have also begun to require advertisers to add generative AI disclosures on political advertisements hosted on their platforms.<sup>36</sup>

In sum, public pressure, economic factors driving mass layoffs of Trust & Safety teams, regulatory scrutiny, and federal and state legislative proposals have changed how online services develop and enforce their political ad policies. The following section identifies these changes for each of the seven companies we analyzed.

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- 29 Goldstein, J. A., Chao, J., Grossman, S., Stamos, A., & Tomz, M. (2024). How persuasive is AI-generated propaganda? *PNAS Nexus*, 3(2), page 34. <https://doi.org/10.1093/pnasnexus/pgae034> [perma.cc/8YY4-688Y]
- 30 Carr, C. (2023, October 26). Generative AI tools like Midjourney, DALL-E 3 and Stable Diffusion will upend advertising through hyper-personalization. *Technical.Ly*. <https://technical.ly/software-development/generative-ai-advertising-hyper-personalization/> [perma.cc/BR9M-6G4B]
- 31 Brennen, S. B., & Perault, M. (2023). *The new political ad machine: Policy frameworks for political ads in an age of AI*. Center on Technology Policy at the University of North Carolina at Chapel Hill. <https://techpolicy.unc.edu/wp-content/uploads/2023/11/GAI-and-political-ads.pdf> [perma.cc/98YR-8E2P]
- 32 LaChapelle, C., & Tucker, C. (2023). *Generative AI in Political Advertising*. Brennan Center for Justice. <https://www.brennancenter.org/our-work/research-reports/generative-ai-political-advertising> [perma.cc/LW25-5LUD]
- 33 Spring, M. (2024, March 4). Trump supporters target black voters with faked AI images. *BBC*. <https://www.bbc.com/news/world-us-canada-68440150> [perma.cc/THR9-3RHK]
- 34 *Disclaimers on Political Advertisements*. (2023, March 14). National Conference of State Legislatures. <https://www.ncsl.org/elections-and-campaigns/disclaimers-on-political-advertisements> [perma.cc/YMR9-2SPA]
- 35 Klobuchar Statement on Rules Committee Passage of Three Bipartisan AI and Elections Bills. (2024, May 15). <https://www.klobuchar.senate.gov/public/index.cfm/2024/5/klobuchar-statement-on-rules-committee-passage-of-three-bipartisan-ai-and-elections-bills> [perma.cc/GQ8P-6N9P]
- 36 Isaac, M. (2023, November 8). Meta to Require Political Advertisers to Disclose Use of A.I. *The New York Times*. <https://www.nytimes.com/2023/11/08/technology/meta-political-ads-artificial-intelligence.html>

# Political ads policies by company

## Platforms that allow political ads

### *Google/YouTube*

Google defines political advertising narrowly, focusing on “election ads” pertaining to political candidates, political parties, or ballot measures.<sup>37</sup> YouTube, which is owned by Google, follows its parent company’s political ads policy in addition to its own. For this report, we focus on YouTube, though we refer to Google when discussing a Google-wide policy.

**Advertiser verification.** In order to run election ads on Google or YouTube, advertisers must go through the Election Ads verification process specific to their region.<sup>38</sup> Only U.S.-based advertisers can run political ads targeting U.S. voters. In 2022, YouTube decided to no longer exempt news organizations from this policy: news outlets must now complete the same ads verification process as other political advertisers.<sup>39</sup> This policy change came in the context of the rise of overtly partisan news outlets, which further complicated the already challenging task of defining who counts as a news organization.

**Ad transparency.** Political ads on Google are subject to several transparency measures. Google’s Ad Transparency Center catalogs all ads run on YouTube,<sup>40</sup> including election ads,<sup>41</sup> since 2018. Google requires election ads to have “paid for by” disclosures and specifies that the disclosure is not a replacement for any other disclosures campaigns may be required to include in the ad by law. For generative AI, Google has two operative policies. First, Google’s manipulated media policy bans deceptive, altered media related to “politics, social issues, or matters of public concern.”<sup>42</sup> This policy was introduced ahead of the 2020 U.S. presidential election cycle. Second, Google added disclosure requirements for synthetic or digitally altered

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37 *Political content.* (2024). Google - Advertising Policies Help. <https://support.google.com/adspolicy/answer/6014595?hl=en#zippy=%2Cunited-states-us-election-ads> [perma.cc/PG33-YLPL]

38 *Election advertising verification.* (2024). Google - Advertising Policies Help. <https://support.google.com/adspolicy/troubleshooter/9973345> [perma.cc/7RX5-M4C4]

39 Google. (2021, December 2). *Updates to political content policy (May 2022)*. Advertiser Policies Help. <https://support.google.com/adspolicy/answer/11993502?hl=en> [perma.cc/PZ8A-R7H7]

40 *Ads transparency for a safe and open internet.* (2024). Google - Ads Transparency Center. <https://adstransparency.google.com/?region=US> [perma.cc/M7BB-4TDK]

41 *Political advertising on Google.* (2024). Google - Ads Transparency Center. <https://adstransparency.google.com/political?region=US&topic=political> [perma.cc/3WNF-PASG]

42 *Misrepresentation.* (2024). Google - Advertising Policies Help. <https://support.google.com/adspolicy/answer/6020955?hl=en&sjid=8619370875212352190-NA> [perma.cc/ZC5B-R5ZJ]

content in September 2023.<sup>43</sup> This policy is intended to allow political advertisers to use AI in ways that are not deceptive. Google's policy exempts AI alterations that are "inconsequential to the claims made in the ad."<sup>44</sup> For example, image resizing and brightening corrections do not need to be disclosed. For the AI disclosure itself, YouTube provides a label template for most ad formats (e.g., Feeds and Shorts).<sup>45</sup>

**Other policy details.** Election ads on YouTube must abide by both Google's political content policy and YouTube's Community Guidelines, which prohibit paid or organic election-related misinformation, including voter suppression, questioning candidates' eligibility, or inciting interference with democratic processes.<sup>46, 47, 48, 49</sup> Shortly after the 2020 U.S. election, Google added an additional policy to protect election integrity by removing "content that advances false claims that widespread fraud, errors, or glitches occurred in the 2020 and other past US Presidential elections."<sup>50</sup> Notably, the policy only applied to past elections that had already been certified. This differs from the approach of other social media companies, including Meta, that created similar policies to protect the period after an election has taken place but prior to its certification.

Google also restricts targeting features for election ads, allowing advertisers to target only by geographic location, age, gender, and contextual features.<sup>51</sup> Advertisers cannot use Google's remarketing, customer match, and geographic radius<sup>52</sup> targeting features.

Google periodically restricts when political ads can appear on its platforms. In September 2020, Google announced an election ads blackout period that went into effect after polls

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43 *Political content*. (2024). Google - Advertising Policies Help. <https://support.google.com/adspolicy/answer/6014595?hl=en#zippy=%2Cunited-states-us-election-ads> [perma.cc/PG33-YLPL]

44 Ibid.

45 *Update to our policy on Disclosure requirements for synthetic content*. (2024, July 1). [https://support.google.com/adspolicy/answer/15142358?hl=en&ref\\_topic=29265&sjid=8619370875212352190-NA](https://support.google.com/adspolicy/answer/15142358?hl=en&ref_topic=29265&sjid=8619370875212352190-NA) [perma.cc/FXW8-7KJU]

46 *Political content*. (2024). Google - Advertising Policies Help. <https://support.google.com/adspolicy/answer/6014595?hl=en#zippy=%2Cunited-states-us-election-ads> [perma.cc/PG33-YLPL]

47 *YouTube Community Guidelines*. (2024). How YouTube Works. <https://www.youtube.com/howyoutubeworks/policies/community-guidelines/> [perma.cc/98WC-SWYE]

48 *Elections misinformation policies*. (2024). YouTube Help. <https://support.google.com/youtube/answer/10835034?hl=en> [perma.cc/KYW3-RC3D]

49 *YouTube Security & Election Policies*. (2024). How YouTube Works. <https://www.youtube.com/howyoutubeworks/our-commitments/supporting-political-integrity/> [perma.cc/4M54-HSYJ]

50 The Youtube Team (2023, June 2). An update on our approach to US election misinformation. <https://blog.youtube/inside-youtube/us-election-misinformation-update-2023/> [perma.cc/CQT5-9YBE]

51 Spencer, S. (2019, November 20). *An update on our political ads policy*. Google - The Keyword. <https://blog.google/technology/ads/update-our-political-ads-policy/> [perma.cc/6WPV-DF8U]

52 For geographic radius, an advertiser indicates a mile radius range around a city. For geographic location, an advertiser indicates a city. As such, geographic radius is a broader targeting tool than geographic location.

closed on Election Day as part of its decision to designate the election a “sensitive event.”<sup>53,54</sup> Google lifted the blackout period in mid-December, but then reinstated it on January 14th following the January 6th, 2021 insurrection.<sup>55</sup> Google has not announced plans to enact an ads blackout period after the 2024 election.

**What’s new in 2024 for Google.** In June 2023, Google announced changes to its policies on election-related misinformation to allow content, previously prohibited in the U.S., that advances “false claims that widespread fraud, errors, or glitches occurred in certain past elections to determine heads of government,” as well as content “that claims that the certified results of those elections were false.”<sup>56, 57</sup> YouTube later clarified that this change does not extend to its political ads policies, which continue to prohibit ads with “claims that are demonstrably false and could significantly undermine participation or trust in an electoral or democratic process.”<sup>58</sup>

Google announced its generative AI disclosure policy for political ads in September 2023, making it the first company to do so.<sup>59</sup> Building on its existing policy of requiring “paid for by” disclosures on election advertising, Google ultimately decided upon a disclosure regime and announced its new policy in September 2023. In addition, while Google has introduced generative AI tools for advertising, these are prohibited for use in election ads.<sup>60</sup>

## Meta

Meta’s policy governing “Ads about Social Issues, Elections, or Politics” (abbreviated to SIEP)<sup>61</sup> covers ads by, on behalf of, or about political figures, candidates, political parties and

53 Bond, S. (2020, September 25). Google To Halt Political Ads After Polls Close, Amid Worries Over Delayed Results. *NPR*. <https://www.npr.org/2020/09/25/916957090/google-to-halt-political-ads-after-polls-close-amid-worries-over-delayed-results> [perma.cc/WN5P-4AS9]

54 *Inappropriate content*. (2024). Google - Advertising Policies Help. [https://support.google.com/adspolicy/answer/6015406?hl=en&ref\\_topic=1626336&sjid=7062433925766879656-NA](https://support.google.com/adspolicy/answer/6015406?hl=en&ref_topic=1626336&sjid=7062433925766879656-NA) [perma.cc/5FZM-ALCM]

55 *Important policy update*. (2021). Google - Merchant Center Help. <https://support.google.com/merchants/answer/10347544?hl=en> [perma.cc/322P-AJSP]

56 The Youtube Team (2023, June 2). An update on our approach to US election misinformation. <https://blog.youtube/inside-youtube/us-election-misinformation-update-2023/> [perma.cc/CQT5-9YBE]

57 Google. (2024). *Elections misinformation policies*. YouTube Help. [https://support.google.com/youtube/answer/10835034?hl=en&amp=&ref\\_topic=10833358&sjid=4002580615044614685-NA](https://support.google.com/youtube/answer/10835034?hl=en&amp=&ref_topic=10833358&sjid=4002580615044614685-NA) [perma.cc/LP95-4F3W]

58 *Misrepresentation*. (2024). Google - Advertising Policies Help. <https://support.google.com/adspolicy/answer/6020955?hl=en&sjid=8619370875212352190-NA> [perma.cc/ZC5B-R5ZJ]

59 *Updates to Political content policy*. (2023, September). Google - Advertising Policies Help. <https://support.google.com/adspolicy/answer/13755910?hl=en> [perma.cc/2GS3-H9PL]

60 *AI-powered Advertising and Marketing Solutions—Google Ads*. (2024). Google Ads. [https://ads.google.com/intl/en\\_us/home/campaigns/ai-powered-ad-solutions/](https://ads.google.com/intl/en_us/home/campaigns/ai-powered-ad-solutions/) [perma.cc/FHL7-RZM7]

61 *Ads about Social Issues, Elections or Politics*. (2024). Meta - Transparency Center. <https://transparency.meta.com/policies/ad-standards/siep-advertising/siep> [perma.cc/R5JL-YDPV]

political action committees (PACs); ads that advocate for the outcome of an election; ads about ballot measures/propositions; and election information campaigns. The policy also covers social issues, which Meta defines as “sensitive topics that are heavily debated, may influence the outcome of an election, or result in/relate to existing or proposed legislation.”<sup>62</sup> Meta maintains a list of what it considers to be social issues, including definitions tailored to specific countries.<sup>63</sup>

**Advertiser verification.** In order to run SIEP ads on Facebook and Instagram,<sup>64</sup> advertisers must go through an authorization process to confirm their identity and location. Only U.S.-based advertisers can run U.S. political ads, with some minor exceptions.<sup>65</sup>

**Ad transparency.** SIEP ads on Meta platforms are subject to several transparency efforts. SIEP ads must include a “paid for by” disclosure in addition to complying with any applicable disclosures required by law, and if an ad contains synthetic content, then a generative AI disclosure is required as well. For SIEP ads, the disclosure reads “Digitally created.” While Meta has introduced generative AI tools for advertising — which can generate ad images and headlines — advertisers cannot use these tools in SIEP ads.<sup>66</sup> Meta also maintains an Ad Library, launched in 2018, which archives SIEP ads for 7 years.<sup>67</sup>

**Other policy details.** SIEP ads must abide by Meta’s Community Standards, which prohibit hate speech, incitement to violence, and misinformation, as well as ads-specific election-related prohibitions on discouraging voting, questioning the legitimacy of an election, and prematurely claiming election victory. These election-related ads prohibitions were first introduced ahead of the 2020 U.S. presidential election.

Ahead of the 2022 U.S. midterms, Meta updated its election-related prohibited content policy.<sup>68</sup> While the changes expanded the policy to new countries — it now applies in 33 countries — the company also modified the policy to only apply to “upcoming and ongoing”

62 *About social issues.* (2024). Meta Business Help Center. <https://www.facebook.com/business/help/214754279118974> [perma.cc/7VPQ-WT2A]

63 For the U.S., Meta lists the following as social issues: Civil and social rights, Crime, Economy, Environmental politics, Health, Immigration, Political values and governance, Security and foreign policy.

64 Of Meta’s social media platforms, advertisers can run political (SIEP) ads on Facebook and Instagram.

65 Meta allows non-U.S. based advertisers to run social issues ads targeting the U.S. in two instances: “Select advertisers and intergovernmental organizations (defined as having a membership of three or more sovereign states bound together by a treaty) qualify to run ads about social issues targeting multiple countries unless otherwise prohibited to do so. Qualifying charitable and humanitarian organizations can run specific social issue ads across the European Union, United Kingdom and United States. Ads will continue to require disclaimers and must not include electoral, political or legislative content. Advertisers are required to follow all other stated terms and conditions.” About ads about social issues, elections or politics. Meta Business Help center. (2024). <https://www.facebook.com/business/help/167836590566506?id=288762101909005> [perma.cc/LJA6-FH28]

66 *Introducing Enhanced Gen AI Features and Other Tools to Help Build Your Business.* (2024, May 7). Meta for Business. <https://www.facebook.com/business/news/Introducing-Enhanced-Gen-AI-Features-and-Other-Tools-to-Help-Build-Your-Business> [perma.cc/FJL8-DC8G]

67 *Ad Library.* (2024). Meta - Ads. <https://www.facebook.com/ads/library> [perma.cc/ZS69-JTRA]

68 Rodriguez, S. (2023, November 15). *Meta allows ads claiming rigged 2020 election on Facebook, Instagram.* The Wall Street Journal. <https://www.wsj.com/tech/meta-allows-ads-claiming-rigged-2020-election-on-facebook-instagram-309b678d>

elections.<sup>69</sup> As a result, Meta no longer prohibits political ads that call into question the legitimacy of past elections, notably including the 2020 election which originally precipitated the policy. In the same year, Meta removed some of its detailed targeting options for political ads, and also updated the Ads Library to include political ads' target audiences.<sup>70, 71</sup>

Meta has some exceptions to its political advertising transparency requirements, including for news publishers in the News Pages Index, and for commercial advertisements that include social issues where the primary purpose is commercial, which Meta defines as having the primary purpose of promoting the sale of a product or service.<sup>72, 73</sup>

Meta periodically sets restrictions on when political ads can appear on its platforms. Beginning in 2020, Meta introduced a political ads pause period, which implements a restriction period on *new* political ads in the final week before elections. Existing ads already approved by Meta's ads teams continue to run during the ads pause period. Enacted for the 2020 U.S. general election and the 2022 U.S. midterms, Meta plans on enacting another ads pause period for the 2024 U.S. general election.<sup>74</sup> Meta also enacted a political ads blackout period, during which no political ads ran at all, following the 2020 U.S. election. Meta has not announced plans to enact an ads blackout period in the 2024 U.S. general election.

**What's new in 2024 for Meta.** Meta introduced its generative AI disclosure policy for political ads in November 2023.<sup>75</sup> Under this policy, political advertisers will have to disclose when an ad is digitally altered to depict someone saying or doing something they did not say or do. Meta also prohibits the use of its new genAI ads tools for political and social issues ads.<sup>76</sup>

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69 *Information on prohibited ads related to voting and ads about social issues, elections, or politics.* Meta Business Help Center. (2024). <https://www.facebook.com/business/help/253606115684173> [<https://perma.cc/7KP5-GX4W>]

70 Horwitz, J. (2021, November 9). Facebook Parent Meta Limits Ad Targeting for Politics and Other Sensitive Issues. *Wall Street Journal*. <https://www.wsj.com/articles/facebook-parent-meta-bans-targeting-for-political-ads-11636488053>

71 *About Detailed Targeting.* (2024). Meta Business Help Center. <https://www.facebook.com/business/help/182371508761821> [[perma.cc/5FLU-WFZ7](https://perma.cc/5FLU-WFZ7)]

72 *About News Page Index.* Meta Business Help Center. (2024). <https://www.facebook.com/business/help/377680816096171?id=644465919618833> [[perma.cc/S3QF-4DEY](https://perma.cc/S3QF-4DEY)]

73 *Ads about social issues and selling products or services.* Meta Business Help Center. (2024). <https://www.facebook.com/business/help/287622936276216> [[perma.cc/JP3H-WT4D](https://perma.cc/JP3H-WT4D)]

74 Clegg, N. (2023, November 29). How Meta Is Planning for Elections in 2024. *Meta Newsroom*. <https://about.fb.com/news/2023/11/how-meta-is-planning-for-elections-in-2024/> [[perma.cc/F962-GFZD](https://perma.cc/F962-GFZD)]

75 *Helping People Understand When AI Or Digital Methods Are Used In Political or Social Issue Ads.* (2023, November 8). Meta for Government and Nonprofits. <https://www.facebook.com/government-nonprofits/blog/political-ads-ai-disclosure-policy> [[perma.cc/RPL6-X55T](https://perma.cc/RPL6-X55T)]

76 Paul, K. (2023, November 7). Meta bars political advertisers from using generative AI ads tools. *Reuters*. <https://www.reuters.com/technology/meta-bar-political-advertisers-using-generative-ai-ads-tools-2023-11-06/>

Beyond political ads, Meta introduced AI disclosures for organic content in May 2024.<sup>77</sup> An “AI info” label will be added to organic content that either (1) the user has disclosed contains AI-generated material or (2) contains industry-shared signals of AI images as detected by Meta’s systems. Initially, Meta’s genAI disclosure read “Made with AI”; but the wording has since changed to “AI Info.”<sup>78</sup> Meta considers this wording to best capture the many varieties of AI use, ranging from generating a new image to editing an existing image, as the industry has discovered that labels based on metadata indicators from other companies aren’t always in line with the public’s expectations. The AI disclosure for political ads reads “Digitally created” as opposed to “AI info” for organic content. The more narrow wording of “Digitally created” reflects Meta’s political ads policy, which only requires political advertisers to disclose AI usage for certain scenarios, for example when the ad is digitally altered to depict someone saying or doing something they did not say or do.<sup>79</sup> For organic content, even the use of AI to make minor modifications can receive an “AI info” label.

Meta’s new genAI disclosures replace a 2020 manipulated media policy, which forbade any AI-generated video that depicted someone saying something they did not say.<sup>80</sup> This change in policy approach was informed by feedback from Meta’s Oversight Board, which noted that the policy in place in 2020 was too narrow, given that it only focused on video formats, and prioritized removal of content rather than labeling.<sup>81</sup>

## Reddit

Compared to Meta’s and Google’s policies—which span several web pages—Reddit’s political ads policies are relatively simple, contained within one webpage. Reddit’s definition for political ads includes ads related to campaigns or elections; ads promoting political merchandise; ads featuring a political call to action, such as signing a petition; and issue ads or advocacy ads pertaining to topics of potential legislative or political importance.<sup>82</sup> Notably, Reddit only allows political ads for U.S. federal elections, setting it apart from other companies in this report.<sup>83</sup> One outcome of Reddit’s smaller political ads footprint is that all political ads submitted and run on Reddit are human reviewed.<sup>84</sup>

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77 Bickert, M. (2024, April 5). Our Approach to Labeling AI-Generated Content and Manipulated Media. *Meta Newsroom*. <https://about.fb.com/news/2024/04/metas-approach-to-labeling-ai-generated-content-and-manipulated-media/> [perma.cc/HD6T-YV4D]

78 Ibid.

79 *About digitally created or altered media disclosure*. (2024). Meta Business Help Center. <https://www.facebook.com/business/help/1486382031937045> [perma.cc/HMT3-PUC9]

80 Bickert, M. (2020, January 7). Enforcing Against Manipulated Media. *Meta Newsroom*. <https://about.fb.com/news/2020/01/enforcing-against-manipulated-media/> [perma.cc/D5TE-5LF3]

81 Oversight Board Upholds Meta’s Decision in Altered Video of President Biden Case. (2024, February 5). *Oversight Board*. <https://www.oversightboard.com/news/1068824731034762-oversight-board-upholds-meta-s-decision-in-altered-video-of-president-biden-case/> [perma.cc/2GG7-VLQV]

82 *Reddit Ads Policy: Restricted Ads*. (2024). Reddit Help. <https://business.reddithelp.com/helpcenter/s/article/Reddit-Advertising-Policy-Restricted-Advertisements> [perma.cc/J52P-X5CM]

83 Google’s policy includes state-level candidates, while Meta includes state and local candidates.

84 *Updating Our Approach to Political Ads*. Reddit. (n.d.). [https://www.reddit.com/r/announcements/comments/g0s6tn/changes\\_to\\_reddits\\_political\\_ads\\_policy/](https://www.reddit.com/r/announcements/comments/g0s6tn/changes_to_reddits_political_ads_policy/)

**Advertiser verification.** In order to run U.S. federal political ads on Reddit, advertisers undergo a certification process and work directly with a Reddit advertising sales representative. Only U.S.-based advertisers can run U.S. political ads. Starting in 2024, political advertisers must have their candidate or a campaign representative participate in a live “Ask Me Anything” (AMA) session on Reddit prior to running ads.<sup>85</sup>

**Ad transparency.** Political ads on Reddit are subject to several transparency measures. Reddit posts a copy of all political ads to the subreddit r/RedditPoliticalAds.<sup>86</sup> All political ads on Reddit must contain a “paid for by” disclosure, in addition to any disclosures required by federal law. The subreddit posts include the ad creative’s text—but not image—as well as the ad URL, advertiser name and address, the period the ad was live, and targeting details. In February 2024, Reddit also introduced a generative AI disclosure policy.<sup>87</sup> Unlike Meta and Google, political advertisers on Reddit are expected to add their own disclosure to the ad creative, rather than using a label template provided by Reddit. Additionally, political ads must not be “deceptive, untrue, or misleading” and must comply with Reddit’s global Content Policy, which also prohibits misleading, AI-generated content and other types of manipulation.<sup>88,89</sup> Reddit also prohibits political ads from containing messaging “intended to undermine public confidence in an election.”<sup>90</sup>

**Other policy details.** On Reddit, ads generally can be targeted to audiences based on subreddit membership, gender and geographic location: country, region or zip code.<sup>91</sup> Political advertisers, however, are not allowed to target based on gender or zip code.<sup>92</sup> Reddit also excludes several sensitive communities, such as addiction support and mental health, from any ad targeting, political or otherwise.<sup>93</sup>

85 Staff. (2024, February 15). *How Reddit Supports Civic Engagement and Election Integrity in 2024*. Reddit - Upvoted. <https://www.redditinc.com/blog/how-reddit-supports-civic-engagement-and-election-integrity-in-2024> [perma.cc/J4ZN-RGQ5]

86 *Reddit Political Ads Transparency Community*. <https://www.reddit.com/r/RedditPoliticalAds/>

87 Staff. (2024, February 15). *How Reddit Supports Civic Engagement and Election Integrity in 2024*. Reddit - Upvoted. <https://www.redditinc.com/blog/how-reddit-supports-civic-engagement-and-election-integrity-in-2024> [perma.cc/J4ZN-RGQ5]

88 *Updating Our Approach to Political Ads*. Reddit. (n.d.). [https://www.reddit.com/r/announcements/comments/g0s6tn/changes\\_to\\_reddits\\_political\\_ads\\_policy/](https://www.reddit.com/r/announcements/comments/g0s6tn/changes_to_reddits_political_ads_policy/)

89 Content Policy. (2024). Reddit Inc. <https://www.redditinc.com/policies/content-policy> [perma.cc/D7GN-HVKF]

90 *Reddit Ads Policy: Restricted Ads*. (2024). Reddit Help. <https://business.reddithelp.com/helpcenter/s/article/Reddit-Advertising-Policy-Restricted-Advertisements> [perma.cc/J52P-X5CM]

91 *Custom Audiences*. (2024). Reddit Help. <https://business.reddithelp.com/helpcenter/s/article/custom-audiences#website-retargeting> [perma.cc/S5YE-QT6B]

92 *Reddit Ads Policy: Restricted Ads*. (2024). Reddit Help. <https://business.reddithelp.com/helpcenter/s/article/Reddit-Advertising-Policy-Restricted-Advertisements> [perma.cc/J52P-X5CM]

93 *Reddit Ads Policy: Targeting Guidelines*. (2024). Reddit Help. <https://business.reddithelp.com/helpcenter/s/article/Reddit-Advertising-Policy-Targeting-Guidelines> [perma.cc/YVN4-H498]

**What's new in 2024 for Reddit.** Reddit made three updates to its political ads policy in February 2024: (1) adding a generative AI disclosure policy, (2) prohibiting attack ads, and (3) requiring "Ask Me Anything" (AMA) sessions for candidates who want to run ads on Reddit.<sup>94</sup>

The required AMA session is intended to allow the Reddit community to interact directly with the campaign. This policy update replaces a 2020 policy, which required political advertisers to leave the comment feature on for at least 24 hours, to allow the Reddit community to respond to the advertisement.

As of September 2024, the ad transparency subreddit r/RedditPoliticalAds, which serves as Reddit's political ad repository, did not contain any political ads from either presidential campaign, and no presidential candidate or campaign from either political party had completed the new AMA session requirement.<sup>95</sup> This suggests that the platform is not yet being used for 2024 presidential advertising.

## **Snap**

Snap allows political advertising, in line with the platform's goal to empower "self-expression, including about politics."<sup>96</sup> Snap's political advertising policies apply to election-related ads, (i.e., ads pertaining to a candidate, political party, or ballot measure) and issue or advocacy ads (i.e., ads pertaining to issues of public debate such as "abortion, immigration, the environment, education, discrimination, and guns").<sup>97</sup>

**Advertiser verification.** In order to run political ads on Snap, advertisers must complete a verification process.<sup>98</sup> Advertisers must be a resident of the country in which they are running political ads. Thus, only U.S.-based advertisers can run U.S. political ads.

**Ad transparency.** Political ads on Snap are subject to several transparency measures. Snap hosts a Political Ads Library, which stores all political and advocacy ads that have run on Snapchat each year since 2018.<sup>99</sup> The .csv files do not include the ad creative (text, image), but they do include the ad URL, advertiser username, the period the ad was live, and targeting details. Snap requires all political ads to have a "paid for by" disclosure and also specifies that "electoral ads must state whether or not the ad was authorized by a candidate or organization, and election ads not authorized by the candidate must include contact information for the sponsoring organization."

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94 Staff. (2024, February 15). *How Reddit Supports Civic Engagement and Election Integrity in 2024*. Reddit - Upvoted. <https://www.redditinc.com/blog/how-reddit-supports-civic-engagement-and-election-integrity-in-2024> [perma.cc/J4ZN-RGQ5]

95 *Reddit Political Ads Transparency Community*. <https://www.reddit.com/r/RedditPoliticalAds/>

96 *Snap Political & Advocacy Advertising Policies*. (2019, May 15). Snap Inc. <https://snap.com/en-US/ad-policies/political> [perma.cc/TSG8-VHNS]

97 Ibid.

98 *Political Ad Review Form*. (2024). Snap Business Help Center. [https://businesshelp.snapchat.com/s/political-ad-review-form?language=en\\_US](https://businesshelp.snapchat.com/s/political-ad-review-form?language=en_US) [perma.cc/9WQL-7JQS]

99 *Snap Political Ads Library*. (2024). Snap Inc. <https://snap.com/en-US/political-ads> [perma.cc/N4NK-TS7A]

Unlike Meta, Google and Reddit, Snap does not have a generative AI disclosure policy. Snap believes that a generative AI disclosure policy would introduce complex enforcement questions without reducing harm. Instead, the company relies on its existing Harmful False or Deceptive Information policy to remove misleading, manipulated content created by generative AI or otherwise.<sup>100</sup> Snap writes: “In all cases, our approach to harmful deceptive content is straightforward: we remove it. We don’t label it, we don’t downrank it; we take it down.”<sup>101</sup> In addition, all political advertisers can be asked to substantiate any claims made in a political ad and, like Reddit, all political ads are subject to human review at Snap.<sup>102</sup>

Like Meta and Google, Snap does not make its generative AI tools available to political advertisers.<sup>103</sup>

**Other policy details.** On Snap, political ads cannot be targeted on criteria related to certain protected classes — race, ethnicity, religion or sexuality. Political ads can be targeted on age, gender, and country (e.g., a U.S. advertiser cannot place ads in EU member states).

**What’s new in 2024 for Snap.** Snap did not make any major policy changes for U.S. political ads in 2024.

## *X (formerly Twitter)*

In 2023, X reversed its ban on political ads,<sup>104</sup> which the company then known as Twitter had rolled out in 2019, asserting that political reach should be “earned, not bought”.<sup>105</sup> Under new ownership and with a new name, X decided to again allow political ads, delineating two subtypes of ads in its definition: political content ads and political campaigning ads.<sup>106</sup> Political *content* ads reference a candidate, political party, legislation, etc., while political *campaigning* ads solicit support for or against a candidate, political party, ballot measure, etc.

100 *Harmful False or Deceptive Information*. (2024, January). Snap Privacy, Safety, and Policy Hub. <https://values.snap.com/privacy/transparency/community-guidelines/harmful-false-information> [perma.cc/9RZB-WNF9]

101 *Sharing our Response to Civil Society Groups on Election Integrity*. (2024, April 22). Snap Privacy, Safety, and Policy Hub. <https://values.snap.com/news/election-integrity-letter> [perma.cc/L3WW-KV4C]

102 *Snap Political & Advocacy Advertising Policies*. (2019, May 15). Snap Inc. <https://snap.com/en-US/ad-policies/political> [perma.cc/TSG8-VHNS]

103 *Sharing our Response to Civil Society Groups on Election Integrity*. (2024, April 22). Snap Privacy, Safety, and Policy Hub. <https://values.snap.com/news/election-integrity-letter> [perma.cc/L3WW-KV4C]

104 X Safety. (2023, August 29). *Supporting people’s right to accurate and safe political discourse on X*. X Blog. [https://blog.x.com/en\\_us/topics/company/2023/supporting-peoples-right-to-accurate-and-safe-political-discourse-on-x](https://blog.x.com/en_us/topics/company/2023/supporting-peoples-right-to-accurate-and-safe-political-discourse-on-x)

105 jack [@jack]. (2019, October 30). *We’ve made the decision to stop all political advertising on Twitter globally. We believe political message reach should be earned, not bought. Why? A few reasons...* 🇺🇸 [Tweet]. Twitter. <https://x.com/jack/status/1189634360472829952> [perma.cc/3P82-2PLB]

106 *Political Content*. (2024). X Business. <https://business.x.com/en/help/ads-policies/ads-content-policies/political-content.html> [perma.cc/F2EY-AMPQ]

**Advertiser verification.** In order to run political campaigning ads on X, advertisers must complete a political ads certification process, which includes verifying their identity and location.<sup>107</sup> Only U.S.-based advertisers can run U.S. political ads. To run political content ads, however, advertisers do not need to be verified.

**Ad transparency.** Unlike other major platforms, X does not require either “paid for by” disclosures or generative AI disclosures on political ads. Its policy does, however, specify that “[a]dvertisers must comply with any applicable laws regarding disclosure and content requirements” and that “compliance is the sole responsibility of the advertiser,” suggesting that X expects advertisements subject to federal or state disclosure requirements to include any mandated disclosures. X does have a synthetic and manipulated media policy, which prohibits the sharing of deceptively-altered media in either ads or organic content.<sup>108</sup> Under this policy, X also retains the ability to label misleading media.

In addition to not having to disclose the use of AI, political advertisers can also use X’s new feature “AI Audience,” which curates ad audiences using AI.<sup>109</sup> This sets X in contrast with other major platforms – Meta, Google, and Snap – which prohibit the use of their AI-powered ads tools in political ads.

X does archive political campaigning ads – but not political content ads – for transparency purposes.<sup>110</sup> Instead of one central repository, however, X stores these ads in multiple places with varying formats. For U.S. political ads, the repository is provided in a .csv file.<sup>111</sup> For political ads (U.S. and otherwise) that ran between May 2018 and 2019, there are two downloadable .txt files.<sup>112</sup> For E.U. ads (political and otherwise), X launched a web-based ads repository in 2023 to comply with the Digital Services Act.<sup>113</sup> For U.S. political ads, the .csv does not include the ad creative (text, image), but it does include the ad URL, the advertiser username, the period the ad was live, and targeting details.

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107 *Apply for Ads Pre-Authorization*. (2024). X Ads. <https://ads.x.com/en/help/ads-pre-authorization/political-ads-certification/united-states>

108 *Our synthetic and manipulated media policy*. (2023, April). X Help Center. <https://help.x.com/en/rules-and-policies/manipulated-media>

109 Fortis, S. (2024, May 10). X launches AI-curated audiences for advertisers. *Cointelegraph*. <https://cointelegraph.com/news/x-launches-ai-curated-audiences-for-advertisers>

110 *Ads transparency*. (2024). X Business. <https://business.x.com/en/help/ads-policies/product-policies/ads-transparency.html> [perma.cc/6ZJ2-5E58]

111 *Political Ads Disclosure*. (2024). X Business. <https://business.x.com/en/help/ads-policies/ads-content-policies/political-content/political-ads-disclosure.html> [perma.cc/65D3-DY6C]

112 *Ads transparency*. (2024). X Business. <https://business.x.com/en/help/ads-policies/product-policies/ads-transparency.html> [perma.cc/6ZJ2-5E58]

113 *Ads repository*. (2024). Twitter Ads. <https://ads.twitter.com/ads-repository>

**Other policy details.** X has a Civic Integrity Policy, which is temporarily applied during an election cycle.<sup>114, 115</sup> The policy asks users not to use the platform to manipulate or interfere in elections, but X does not ban such content outright, including for high-stakes violations like “sharing content that may suppress participation, mislead people about when, where, or how to participate in a civic process, or lead to offline violence during an election.”<sup>116</sup> If X identifies offending content, it can decide to label it or downrank its visibility. This policy applies to both organic and ad content.

On X, political ads can be targeted using the following features: location, age, gender, interests & keywords, custom audiences, and follower look-alikes.<sup>117</sup> X also has sensitive categories which cannot be targeted by any ads, political or otherwise, including religious or philosophical affiliation, health, sexual orientation, biometric data, and political affiliation.<sup>118</sup>

To identify policy violations, X has an ads review process as well as user reporting channels. Users may report political ads in their timeline or submit political ads they think have not been adequately labeled through a form in the platform’s Help Center.<sup>119</sup> X does not disclose how reports are prioritized nor does it disclose whether reports are reviewed through human or automated processes. X’s policies regarding repeat violation of the platform’s policies are discretionary and based on “factors including, but not limited to, how many times the advertiser violates a policy, which policies they violate, and the time frame over which their violations occurred.”

**What’s new in 2024 for X.** In 2024, political ads will again run on X, after being banned since 2019.<sup>120</sup> Since reintroducing political ads, X has not made any major changes to its political ad policies. Previously, Twitter had allowed political ads in all markets. Today, X allows political ads only in select markets, including the U.S.

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114 X does not publicly state when enforcement of this policy begins or ends for any given election cycle.

115 *Civic integrity policy*. (2023, August). X Help Center. <https://help.x.com/en/rules-and-policies/election-integrity-policy>

116 Ibid.

117 *Political Content*. (2024). X Business. <https://business.x.com/en/help/ads-policies/ads-content-policies/political-content.html> [perma.cc/F2EY-AMPQ]

118 *Targeting of Sensitive Categories Policy*. (2024). X Business. <https://business.x.com/en/help/ads-policies/campaign-considerations/targeting-of-sensitive-categories.html> [perma.cc/MB2N-R8LP]

119 *Political Content FAQs*. (2024). X Business. <https://business.x.com/en/help/ads-policies/ads-content-policies/political-content/faqs.html> [perma.cc/YJ57-99E3]

120 X Safety. (2023, August 29). *Supporting people’s right to accurate and safe political discourse on X*. X Blog. [https://blog.x.com/en\\_us/topics/company/2023/supporting-peoples-right-to-accurate-and-safe-political-discourse-on-x](https://blog.x.com/en_us/topics/company/2023/supporting-peoples-right-to-accurate-and-safe-political-discourse-on-x)

Since the reintroduction of political ads on X, U.S. candidates have spent millions of dollars to run thousands of political ads on the platform.<sup>121, 122</sup> Yet, many have noted that X's policies regarding political advertisements seem to be inconsistently enforced in ways that go beyond inadvertent, isolated errors.<sup>123</sup> There is also reason to question the company's commitment to enforcing its policies fairly and consistently. For example, in July 2024 X's Chairman Elon Musk shared an AI-manipulated video of Vice President Kamala Harris, then the presumptive Democratic nominee, in apparent violation of X's own synthetic and manipulated media policy.<sup>124</sup> A report from the Center for Countering Digital Hate identified 50 posts from Musk which contained election misinformation.<sup>125, 126</sup> None of the 50 posts, however, received a "Community Note" to correct the inaccuracies – further calling into question X's enforcement of its own policies.<sup>127</sup>

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121 Lima-Strong, C., & Schaffer, A. (2023, December 11). As advertisers flee Musk's X, Democrats splurge on political ads. *Washington Post*. <https://www.washingtonpost.com/technology/2023/12/11/democrats-political-ads-x-elon-musk/>

122 Hall, M. (2023, December 1). Politicians, particularly Democrats, continue to spend a fortune on Twitter ads even as advertisers leave the platform in droves. *Business Insider*. <https://www.businessinsider.com/campaigns-spent-millions-on-x-ads-as-advertisers-leave-site-2023-11> [perma.cc/V98K-GT7J]

123 Piper, J. (2023, April 10). Twitter fails to report some political ads after promising transparency. *POLITICO*. <https://www.politico.com/news/2023/04/10/twitter-political-ads-transparency-00091077>

124 Bensinger, K. (2024, July 28). Elon Musk Shares Manipulated Harris Video, in Seeming Violation of X's Policies. *The New York Times*. <https://www.nytimes.com/2024/07/27/us/politics/elon-musk-kamala-harris-deepfake.html>

125 *Musk misleading election claims viewed 1.2bn times on X – with no fact checks*. (2024). Center for Countering Digital Hate. <https://counterhate.com/research/musk-misleading-election-claims-viewed-1-2bn-times-on-x-with-no-fact-checks/> [perma.cc/XP7B-ZXD2]

126 In 2023, X Chairman Elon Musk [sued](#) the Center for Countering Digital Hate (CCDH), claiming that the nonprofit intentionally spread falsehoods about the social media company. The court case, however, was [dismissed](#) in March 2024.

127 Ingram, D. (2024, August 8). Elon Musk's misleading election claims have accrued 1.2 billion views on X, new analysis says. *NBC News*. <https://www.nbcnews.com/tech/misinformation/elon-musk-misleading-election-claims-x-views-report-rcna165599> [perma.cc/VF8C-K73X]

## Platforms that do not allow political ads

### *LinkedIn*

LinkedIn does not allow political ads on its platform, as it seeks to be a forum for professional networking.<sup>128</sup> LinkedIn's definition of political advertising includes "ads exploiting a sensitive political issue even if the advertiser has no explicit political agenda."<sup>129</sup> This stipulation is intended to prevent advertisers from seeking commercial gain during sensitive events, such as during a political regime change or global health crisis. LinkedIn does not ban social issue ads. Advertisers can raise awareness of issues (e.g., "We need to work together to combat climate change"), but not advocate for specific political action (e.g., "Vote yes on Proposition XYZ"). LinkedIn also maintains a list of candidates, politicians, and other public figures of note. This list is used to both enforce the political ads ban, as well as to also prevent bad actors from creating accounts impersonating world leaders.

LinkedIn does not currently have a policy for disclosing use of generative AI in either organic or ad content, though the company has plans to release such a policy in the coming year. Previously LinkedIn has recommended users disclose when they have "relied heavily on AI to create or modify" content in a 2023 blog post.<sup>130</sup> LinkedIn is also building out its capabilities to detect generative AI in both organic and ad content.

**What's new in 2024 for LinkedIn.** LinkedIn has no major updates to its political ads policy in 2024.

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128 Tu, W. (2024, February 16). Keeping LinkedIn Professional Throughout 2024 and Beyond. *Trust at LinkedIn*. <https://www.linkedin.com/pulse/keeping-linkedin-professional-throughout-2024-beyond-wei-tu-gcsuc> [perma.cc/UN3D-PWZR]

129 *LinkedIn Advertising Policies*. (2024, May 13). LinkedIn. <https://www.linkedin.com/legal/ads-policy> [perma.cc/YZ62-ANU9]

130 Best practices for content created with the help of AI. (2023). *LinkedIn Help*. <https://www.linkedin.com/help/linkedin/answer/a1481496> [perma.cc/M6PN-HJQM]

## TikTok

TikTok does not allow political ads on its platform, as it seeks to prioritize creator content. Its definition of political content is one of the most expansive among the companies assessed in this report: it includes election ads, “get out the vote” messaging, criticism of government track records, and political merchandise.<sup>131, 132</sup> Similar to LinkedIn, TikTok does not categorically ban social issue ads. Advertisers can raise awareness of issues, but not call for specific political actions, such as supporting a particular bill.

TikTok’s political ads prohibition consists of three types of restrictions: (1) restrictions at the account level, where political figures are not allowed to advertise, (2) restrictions at the content level, where advertisements cannot endorse a political candidate or encourage users to vote in a certain way, and (3) restrictions on branded content, where creators cannot create content on behalf of political parties or PACs. For account-level restrictions, TikTok has a Government, Politician, and Political Party (GPPPA) policy to further identify accounts considered to be political.<sup>133</sup> Accounts labeled as GPPPA are ineligible to run ads or engage in other monetization programs, such as the Creator Rewards Program.<sup>134</sup>

TikTok does have a generative AI disclosure requirement in its advertising policies (i.e., for non-political ads permitted to run on the platform.)<sup>135</sup> In July 2024, TikTok released an AI-generated content (AIGC) disclosure tool, and requires advertisers to self-disclose “realistic AI-generated content” in ads.<sup>136</sup> However, synthetic content that seeks to mislead users about a real world event will be removed. TikTok also retains the ability to label synthetic content that was not initially disclosed by the advertiser. Similar to Meta, Google, Snap, and X, TikTok also released a suite of AI-powered advertising tools in 2024.<sup>137</sup>

**What’s new in 2024 for TikTok.** TikTok has no major updates to its political ads policy in 2024.

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131 *Politics, Religion, and Culture*. (2024, August). TikTok Business Help Center. <https://ads.tiktok.com/help/article/tiktok-ads-policy-politics-religion-and-culture> [perma.cc/84M3-AEMQ]

132 Sellers can still offer political merchandise on [TikTok Shop](#), which launched in the United States in September 2023. [perma.cc/3A8N-ZYTU]

133 *Government, Politician, and Political Party Accounts*. (2024). TikTok Help Center. <https://support.tiktok.com/en/using-tiktok/growing-your-audience/government-politician-and-political-party-accounts> [perma.cc/85G4-MJSC]

134 *Creator Rewards Program*. (2024). TikTok Help Center. <https://support.tiktok.com/en/business-and-creator/creator-rewards-program/creator-rewards-program> [perma.cc/VP3R-M92D]

135 *Misleading and false content*. (2024, August). TikTok Business Help Center. <https://ads.tiktok.com/help/article/tiktok-ads-policy-misleading-and-false-content?lang=en> [perma.cc/KB4H-RMZK]

136 *Enhancing Privacy and Control: New Ad Experience and Tools for TikTok Users and Advertisers*. (2024, July 3). *TikTok For Business*. <https://www.tiktok.com/business/en-US/blog/enhancing-privacy-control-advertisers-users> [perma.cc/NV2L-ELM8]

137 *Meet Symphony Avatars: TikTok’s New Creative AI Tool*. (2024, June 17). *TikTok Newsroom*. <https://newsroom.tiktok.com/en-us/announcing-symphony-avatars> [perma.cc/MBQ6-T2D2]

# Analysis

## Defining political ads

Political ads are defined somewhat similarly across the social media companies, with some companies' definitions including social issues and/or voter registration efforts. All companies considered ads that promote a particular candidate, a political party, or a ballot measure to be political. Google, for example, scopes its policies to only election ads.<sup>138</sup> Several companies, meanwhile, had more expansive definitions.

Both LinkedIn and TikTok have somewhat broad definitions of political ads, which could give the companies leeway to decide what ads to prohibit. TikTok's definition includes "promotion or criticizing of government policies or track records" and "language or imagery that explicitly promotes, glorifies, or advocates for war, violence, or armed conflict."<sup>139</sup> LinkedIn's definition prohibits "ads exploiting a sensitive political issue even if the advertiser has no explicit political agenda."<sup>140</sup>

Meta, Reddit, and Snap all include some social dimension in their political ads definition.

- Per Meta's policy, *social issues* involve "sensitive topics that are heavily debated, may influence the outcome of an election or result in/relate to existing or proposed legislation."<sup>141</sup> Examples provided: civil and social rights, crime, economy, education, environmental politics, guns, health, immigration, political values and governance, and security and foreign policy. Meta only requires transparency for social issue ads in certain countries, and only when advertisements include "advocacy, debate, or discussion" of these topics.
- Per Snap's policy, *advocacy or issue ads* involve "issues or organizations that are the subject of debate on a local, national, or global level, or of public importance."<sup>142</sup> Examples provided: abortion, discrimination, the environment, education, guns, and immigration.
- Per Reddit's policy, *issue ads or advocacy ads* involve "topics of potential legislative or political importance." Reddit does not provide public-facing examples of such issues.<sup>143</sup>

138 *Political content*. (2024). Google - Advertising Policies Help. <https://support.google.com/adspolicy/answer/6014595?hl=en#zippy=%2Cunited-states-us-election-ads> [perma.cc/PG33-YLPL]

139 *Politics, Religion, and Culture*. (2024, August). TikTok Business Help Center. <https://ads.tiktok.com/help/article/tiktok-ads-policy-politics-religion-and-culture> [perma.cc/84M3-AEMQ]

140 *LinkedIn Advertising Policies*. (2024, May 13). LinkedIn. <https://www.linkedin.com/legal/ads-policy> [perma.cc/YZ62-ANU9]

141 *About social issues*. (2024). Meta Business Help Center. <https://www.facebook.com/business/help/214754279118974> [perma.cc/7VPQ-WT2A]

142 *Snap Advertising Policies*. (2024). Snap Inc. <https://snap.com/en-US/ad-policies> [perma.cc/5JMS-VX37]

143 *Reddit Ads Policy: Restricted Ads*. (2024). Reddit Help. <https://business.reddithelp.com/helpcenter/s/article/Reddit-Advertising-Policy-Restricted-Advertisements> [perma.cc/J52P-X5CM]

Neither LinkedIn nor TikTok includes social issues in their political ads definition. These companies, which ban political ads, both allow ads that raise awareness of an issue (e.g., “We need to work together to combat climate change”), but disallow ads that call for political action on that issue (e.g., “Vote yes on Proposition XYZ”).

Voter registration and related “get out the vote” content is considered to be a political ad under Meta’s, Snap’s, and TikTok’s policies. Reddit reversed its policy here: in 2020 the political ads policy included voting-related ads under its political ads policy, but now the policy explicitly states that voting-related ads are *not* political content, “provided they are placed by non-political organizations.”<sup>144</sup> By making voting-related ads not political, Reddit aims to encourage non-partisan information on its platform about how to vote and participate in an election.

### ***The decision whether to host political ads***

Of the seven social media companies we analyzed, five allow political ads and two others, LinkedIn and TikTok, prohibit them. When TikTok announced the introduction of paid ad services in 2019, it decided to prohibit political ads.<sup>145</sup> TikTok considers its focus as a social media company to be on creative endeavors, rather than political ones, and believes that running political ads would run counter to that mission. TikTok also acknowledged that hosting political ads would require intensive staffing and resources. LinkedIn also has never allowed political ads, as the company considers its focus to be on professional development.

X (formerly Twitter) is unique in that it stopped hosting political ads in 2019 and has since reversed that decision. This reversal reflects a change in company ethos. The company’s previous CEO Jack Dorsey decided to stop hosting political ads in 2019, stating that political reach should be “earned, not bought.”<sup>146</sup> Following Elon Musk’s purchase of the platform in late 2022, the company reversed its decision, and its revised policy seems to have been a lucrative one. Since the reversal of the political ads ban, U.S. candidates have spent millions of dollars to run thousands of political ads on the platform.<sup>147, 148</sup>

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144 Ibid.

145 Chandlee, B. (2019, August 16). Understanding our policies around paid ads. *TikTok Newsroom*. <https://newsroom.tiktok.com/en-us/understanding-our-policies-around-paid-ads> [perma.cc/638W-FZ4W]

146 jack [@jack]. (2019, October 30). *We’ve made the decision to stop all political advertising on Twitter globally. We believe political message reach should be earned, not bought. Why? A few reasons...* 🇺🇸 [Tweet]. Twitter. <https://x.com/jack/status/1189634360472829952> [perma.cc/3P82-2PLB]

147 Lima-Strong, C., & Schaffer, A. (2023, December 11). As advertisers flee Musk’s X, Democrats splurge on political ads. *Washington Post*. <https://www.washingtonpost.com/technology/2023/12/11/democrats-political-ads-x-elon-musk/>

148 Hall, M. (2023, December 1). Politicians, particularly Democrats, continue to spend a fortune on Twitter ads even as advertisers leave the platform in droves. *Business Insider*. <https://www.businessinsider.com/campaigns-spent-millions-on-x-ads-as-advertisers-leave-site-2023-11> [perma.cc/V98K-GT7J]

Some companies periodically restrict when political ads can appear on their platforms. Of the seven companies evaluated for this report, only Meta has a political ads pause period – which prevents *new* political ads from running in the week prior to the U.S. general election. This pause period is enacted in part to avoid overwhelming the ad teams’ staffing and resources: new political ads must be reviewed before going live. Companies can also enact an ads blackout period – where no ads are allowed to run. Blackout periods aim to protect the quality of the information environment by preventing last-minute misinformation or prematurely calling election results. Meta and Google ceased running all political ads following the closing of polls for the 2020 U.S. election due in part to concerns about delays in results reporting caused by a surge of mail-in voting precipitated during the COVID-19 pandemic. Neither company has signaled plans to do so again in 2024.<sup>149</sup>

Companies can also decide to ban political figures for violating policies around political content and other community norms – a disciplinary action known colloquially as deplatforming. The issue came to a head in January 2021, as then-President Donald Trump refused to accept the results of the 2020 U.S. general election and called for supporters to march on the Capitol, using social media to spread the “Big Lie,” as it came to be known.<sup>150</sup> In response, Meta, X (then Twitter), Snap, and Reddit deplatformed then President Trump,<sup>151</sup> and YouTube suspended the former president’s account for a week.<sup>152</sup> Meta and X have since lifted their bans, while Snap’s and Reddit’s remain in place. In June 2024, the former president created a TikTok account for the first time, amassing near 3 million followers in a single day.<sup>153</sup>

## ***Ad repositories***

Of the social media companies that host political ads, all five have ad transparency repositories, making this practice one of the most common policy features across companies.

An ad repository is intended to bring transparency to online political ads, enabling researchers to understand who is placing ad buys, what the ads say, who the ads are being targeted to, and the reach of the ads. The effectiveness of ad repositories largely depends on how thoroughly the ads are cataloged and how easily researchers can access them.

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149 Bond, S. (2020, September 25). Google To Halt Political Ads After Polls Close, Amid Worries Over Delayed Results. *NPR*. <https://www.npr.org/2020/09/25/916957090/google-to-halt-political-ads-after-polls-close-amid-worries-over-delayed-results> [perma.cc/WN5P-4AS9]

150 Dwoskin, E., & Merrill, J. B. (2022, September 20). Trump’s ‘big lie’ fueled a new generation of social media influencers. *Washington Post*. <https://www.washingtonpost.com/technology/2022/09/20/social-media-influencers-election-fraud/>

151 Fischer, S., & Gold, A. (2021, January 11). All the platforms that have banned or restricted Trump so far. *Axios*. <https://www.axios.com/2021/01/09/platforms-social-media-ban-restrict-trump>

152 Wakabayashi, D. (2021, January 13). YouTube Suspends Trump’s Channel for at Least 7 Days. *The New York Times*. <https://www.nytimes.com/2021/01/12/technology/youtube-suspends-trump.html>

153 Ward, J. (2024, June 3). Donald Trump joins TikTok and rapidly wins three million followers. *Reuters*. <https://www.reuters.com/world/us/donald-trump-joins-tiktok-video-platform-he-once-sought-ban-2024-06-02/>



**Table 2. U.S. political advertising repositories, by company**

Company	Ad repository for U.S. political ads
<b>Google / YouTube</b>	Yes. Web-based repository. Displays ad creative. No keyword search
<b>Meta</b>	Yes. Web-based repository. Displays ad creative. Has keyword search
<b>Reddit</b>	Yes. Subreddit. Contains URL to ad creative. Has keyword search
<b>Snap</b>	Yes. Downloadable CSV files. Contains URL to ad creative. No keyword search
<b>X (formerly Twitter)</b>	Yes. Downloadable CSV files. Contains URL to ad creative. No keyword search
<b>Microsoft / LinkedIn</b>	n/a
<b>TikTok</b>	n/a

Among the five companies with ad transparency repositories, only Meta and Google provide interactive web-based repositories, while Snap and X provide downloadable CSV files. Reddit, meanwhile, has a unique approach — storing ads in a subreddit, which leverages existing platform infrastructure. Meta and Google display the ad creative (i.e., the content of the ad), while Reddit, Snap, and X only provide a URL link to the ad. In addition, Meta and Reddit allow for a keyword search of the ad creative.

A 2024 Mozilla report stress-tested ad repositories of several tech companies, including five of the seven companies being examined here: Google/YouTube, Meta, LinkedIn, Snap, TikTok, and X.<sup>154, 155, 156</sup> Mozilla found large variance in companies' approaches to ad transparency, but overall concluded: "none is a fully-functional ad repository."<sup>157</sup> Mozilla ranked X's efforts among the worst, with a slow loading .csv file in lieu of a web interface. Mozilla and others also emphasize that the inconsistency of data reported across companies — such as ad reach and targeting criteria — makes cross-platform comparison nearly impossible.<sup>158</sup>

154 Lesplingart, A., & Pershan, C. (2024). *Full Disclosure: Stress testing tech platforms' ad repositories*. Mozilla. <https://foundation.mozilla.org/en/research/library/full-disclosure-stress-testing-tech-platforms-ad-repositories/>

155 Reddit and Truth Social were not included in Mozilla's analysis, given the focus on "Very Large Online Platforms" (VLOPs) as designated by the EU Digital Services Act (DSA).

156 It should be noted that Mozilla assessed ad repository efforts for EU countries. Because of varying regulations, several companies have separate repositories for U.S. ads. For example, Snap has a searchable, web-based repository for all EU ads, but only downloadable CSV files for all political ads running on its platform—which includes the U.S.

157 Lesplingart, A., & Pershan, C. (2024). *Full Disclosure: Stress testing tech platforms' ad repositories*. Mozilla. <https://foundation.mozilla.org/en/research/library/full-disclosure-stress-testing-tech-platforms-ad-repositories/>

158 Ibid. A [2020 report](#) from researchers Daniel Kreiss and Bridget Barrett had similar conclusions on the difficulty of cross-platform analysis. [[perma.cc/YAW4-KR8L](https://perma.cc/YAW4-KR8L)]



**Table 3. “Paid for by” disclosure requirements, by company**

Company	“Paid for by” disclosure
Google / YouTube	Yes
Meta	Yes
Reddit	Yes
Snap	Yes
X (formerly Twitter)	No
Microsoft / LinkedIn	n/a
TikTok	n/a

### ***“Paid for by” Disclosures***

“Paid for by” disclosures are intended to provide transparency about who is placing political ads, and such disclosures are required by law for certain advertisements.<sup>159</sup> They also act as a deterrent for political campaigns against spreading extreme or unsubstantiated allegations about a rival campaign.

While social media companies take varying approaches to hosting political ads, having a “Paid for by” disclosure was the second most common policy feature, after ad repositories. Four of the five companies that allow political ads (Google, Meta, Reddit, and Snap) require them for all political advertisers. X did not provide a rationale for why it does not require “Paid for by” disclosures, however its policy does specify that advertisements must comply with applicable laws, which may include “paid for by” disclosures in certain circumstances.

### ***Restricting how political ads can be targeted***

Among the companies that host political ads, all five restrict the availability of targeting criteria. These restrictions are intended to mitigate various potential harms, such as ads that aim to disenfranchise certain voter groups or incite interference in civic processes. The types of targeting restrictions that the social media companies employ, however, vary considerably.

<sup>159</sup> Federal election law requires that some advertisers, particularly political committees, include a “paid for by” disclosure on all public communications, including those on the internet. *Advertising and disclaimers*. FEC.gov. (n.d.). <https://www.fec.gov/help-candidates-and-committees/advertising-and-disclaimers/#special-rules-for-internet-public-communications>



**Table 4. Political advertising targeting restrictions, by company**

“Custom audiences” refers to advertisers uploading unique identifiers (e.g. email address or phone number) for specific consumers to target. “Lookalike audiences” are groups of social network users who share characteristics with another group of members, typically either a custom audience or a specific account or page’s followers.

Company	Targeting restrictions
<b>Google / YouTube</b>	Yes. Allowed targeting: age, gender, geographic location, contextual advertising
<b>Meta</b>	Yes. Allowed targeting: age, gender, location, detailed targeting, language, custom audiences, lookalike audiences
<b>Reddit</b>	Yes. Allowed targeting: keyword, community (specific subreddits)
<b>Snap</b>	Yes. Allowed targeting: age, gender, location
<b>X (formerly Twitter)</b>	Yes. Allowed targeting: age, gender, location, interests & keywords, custom audiences, and follow look-alikes
<b>Microsoft / LinkedIn</b>	n/a
<b>TikTok</b>	n/a

Over the years, companies have followed a trend of limiting, rather than broadening, the targeting criteria for political ads. In 2020, Google limited the targeting of political ads to age, gender, and geographic location – but not geographic radius.<sup>160</sup> Advertisers are still able to engage in contextual advertising as well e.g., by placing an ad next to news stories about the economy). In 2021, Meta (then Facebook) removed micro-targeting options based on politics, race, health, religion and sexual orientation for political ads, preventing advertisers from crafting highly personalized messages.<sup>161</sup> Reddit has some of the most austere targeting restrictions, not allowing targeting by gender or zip code – setting it apart from Google, Meta, Snap, and X.<sup>162</sup>

160 Spencer, S. (2019, November 20). *An update on our political ads policy*. Google - The Keyword. <https://blog.google/technology/ads/update-our-political-ads-policy/> [perma.cc/6WPV-DF8U]

161 Horwitz, J. (2021, November 9). Facebook Parent Meta Limits Ad Targeting for Politics and Other Sensitive Issues. *Wall Street Journal*. <https://www.wsj.com/articles/facebook-parent-meta-bans-targeting-for-political-ads-11636488053>

162 *Reddit Ads Policy: Restricted Ads*. (2024). Reddit Help. <https://business.reddithelp.com/helpcenter/s/article/Reddit-Advertising-Policy-Restricted-Advertisements> [perma.cc/J52P-X5CM]



**Table 5. Generative AI disclosure requirements for political ads, by company**

Company	GenAI disclosure for political ads
Google / YouTube	Yes
Meta	Yes
Reddit	Yes
Snap	No
X (formerly Twitter)	No
Microsoft / LinkedIn	n/a
TikTok	n/a

### *GenAI disclosures – an emerging policy approach*

As of the writing of this report, three of the social media companies we assessed require generative AI disclosures in political ads: Google was first (September 2023),<sup>163</sup> followed by Meta (November 2023),<sup>164</sup> then Reddit (February 2024).<sup>165</sup> Meta’s and Google’s policies include similar language, prohibiting the use of AI-generated individuals, including depiction of real people doing things they did not do or of events that did not happen, in political ads.<sup>166, 167</sup> Snap and X, meanwhile, do not require the disclosure of generative AI, but employ existing policies to ban misleading synthetic media in political ads.<sup>168, 169</sup>

163 *Updates to Political content policy.* (2023, September). Google - Advertising Policies Help. <https://support.google.com/adspolicy/answer/13755910?hl=en> [perma.cc/2GS3-H9PL]

164 *Helping People Understand When AI Or Digital Methods Are Used In Political or Social Issue Ads.* (2023, November 8). Meta for Government and Nonprofits. <https://www.facebook.com/government-nonprofits/blog/political-ads-ai-disclosure-policy> [perma.cc/RPL6-X55T]

165 Staff. (2024, February 15). *How Reddit Supports Civic Engagement and Election Integrity in 2024.* Reddit - Upvoted. <https://www.redditinc.com/blog/how-reddit-supports-civic-engagement-and-election-integrity-in-2024> [perma.cc/J4ZN-RGQ5]

166 *About digitally created or altered media disclosure.* (2024). Meta Business Help Center. <https://www.facebook.com/business/help/1486382031937045> [perma.cc/HMT3-PUC9]

167 *Political content.* (2024). Google - Advertising Policies Help. <https://support.google.com/adspolicy/answer/6014595?hl=en#zippy=%2Cunited-states-us-election-ads> [perma.cc/PG33-YLPL]

168 *Harmful False or Deceptive Information.* (2024, January). Snap Privacy, Safety, and Policy Hub. <https://values.snap.com/privacy/transparency/community-guidelines/harmful-false-information> [perma.cc/9RZB-WNF9]

169 *Our synthetic and manipulated media policy.* (2023, April). X Help Center. <https://help.x.com/en/rules-and-policies/manipulated-media>

Google, Meta, and Reddit vary in their approach to how the AI disclosure is created for political ads. Meta provides a standard label template, which reads “Digitally created.” Reddit asks political advertisers to include a “clear and conspicuous” disclosure in their ad.<sup>170</sup> Google currently has a mix of both approaches: for YouTube ads, there is a standard label template, while for Google Display ads, the advertisers are asked to include a “clear and conspicuous” disclosure in their ad.<sup>171</sup>

Beyond political ads, several companies have broader generative AI disclosure policies, requiring users to disclose when their organic content is fully or partially generated by AI: YouTube (March 2024),<sup>172</sup> Meta (April 2024)<sup>173</sup> and TikTok (April 2024).<sup>174</sup> In addition, several companies also note that they will proactively label organic content as AI-generated (YouTube,<sup>175</sup> Meta,<sup>176</sup> and X<sup>177</sup>). Snap labels organic content as containing AI only if Snap’s generative AI tools were employed.<sup>178</sup> Other AI-generated content on Snap is not labeled, but can be removed if found in violation of their Harmful False or Deceptive Information policy.<sup>179</sup>

At first glance, determining when to disclose digital alteration might seem like a simple yes-no question. There is, however, more nuance to the question. Generative AI can create entirely new images, but it also can make simple photo edits, such as cropping or color adjustment. This results in a “threshold challenge”: when is AI disclosure necessary? To answer this

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170 *Reddit Ads Policy: Restricted Ads*. (2024). Reddit Help. <https://business.reddithelp.com/helpcenter/s/article/Reddit-Advertising-Policy-Restricted-Advertisements> [perma.cc/J52P-X5CM]

171 *Update to our policy on Disclosure requirements for synthetic content*. (2024, July). Google - Advertising Policies Help. [https://support.google.com/adspolicy/answer/15142358?hl=en&ref\\_topic=29265&sjid=8619370875212352190-NA](https://support.google.com/adspolicy/answer/15142358?hl=en&ref_topic=29265&sjid=8619370875212352190-NA) [perma.cc/FXW8-7KJU]

172 *New Disclosures and Labels for Generative AI Content on YouTube*. (2024, March 18). YouTube Help. <https://support.google.com/youtube/thread/264550152/new-disclosures-and-labels-for-generative-ai-content-on-youtube?hl=en> [perma.cc/YPX5-2ENX]

173 Bickert, M. (2024, April 5). Our Approach to Labeling AI-Generated Content and Manipulated Media. *Meta Newsroom*. <https://about.fb.com/news/2024/04/metas-approach-to-labeling-ai-generated-content-and-manipulated-media/> [perma.cc/HD6T-YV4D]

174 Malik, A. (2023, March 21). TikTok overhauls its community guidelines, adds new policies on AI and climate misinformation. *TechCrunch*. <https://techcrunch.com/2023/03/21/tiktok-overhauls-community-guidelines-adds-new-policies-ai-climate-misinformation/> [perma.cc/NQ58-4KKY]

175 *New Disclosures and Labels for Generative AI Content on YouTube*. (2024, March 18). YouTube Help. <https://support.google.com/youtube/thread/264550152/new-disclosures-and-labels-for-generative-ai-content-on-youtube?hl=en> [perma.cc/YPX5-2ENX]

176 Bickert, M. (2024, April 5). Our Approach to Labeling AI-Generated Content and Manipulated Media. *Meta Newsroom*. <https://about.fb.com/news/2024/04/metas-approach-to-labeling-ai-generated-content-and-manipulated-media/> [perma.cc/HD6T-YV4D]

177 *Our synthetic and manipulated media policy*. (2023, April). X Help Center. <https://help.x.com/en/rules-and-policies/manipulated-media>

178 *Generative AI on Snapchat*. (2024). Snapchat Support. <https://help.snapchat.com/hc/en-us/articles/25494876770580-Generative-AI-on-Snapchat>

179 *Harmful False or Deceptive Information*. (2024, January). Snap Privacy, Safety, and Policy Hub. <https://values.snap.com/privacy/transparency/community-guidelines/harmful-false-information> [perma.cc/9RZB-WNF9]

question, Meta and Google’s political ads policies state that disclosure is required if the political ad depicts someone saying or doing something they did not say or do, while digital alteration inconsequential to the ad’s claims does not need to be disclosed. For organic content, Google and TikTok also caveat that minor modifications do not need to be disclosed. Google provides a list of examples to help YouTube creators determine when a disclosure is needed.<sup>180</sup> For organic content on Meta, however, the threshold is lower: content that contains minor AI modifications can receive the “AI info” label from Meta’s automated AI-detection systems.<sup>181</sup>

The effectiveness of disclosures in informing audiences about AI-modified or AI-created content remains to be seen. There are two aspects to consider: first, how rigorously these policies are followed, and, second, how social media users respond to AI disclosures. To the first point, social media companies do not currently share details necessary to assess the enforcement of policies related to undisclosed AI content, while generative AI companies do not share data on how their models are being used.<sup>182</sup> To the second point, it is yet unclear how users will respond to AI disclosures. According to a recent report from UNC’s Center on Technology Policy, the effectiveness of disclosures to inform audiences of AI-modified or AI-created content is still up for debate.<sup>183</sup> Prior work found that “paid for by” disclosures did not increase internet users’ awareness of political ads’ funding.<sup>184</sup> Another study found that only 30% of participants recalled that transparency information had been present on the ads they viewed.<sup>185</sup>

### ***Alternative (partisan) social media***

As mainstream social media platforms (Facebook, Instagram, Twitter, etc.) professionalized their approach to content moderation throughout the 2010s, some Republicans began to criticize content moderation as hostile to conservative ideas and speakers. While this viewpoint is not supported by independent research, it nonetheless gained traction as a partisan “culture war” talking point and inspired the launch of several so-called “alternative” social media platforms like Truth Social and Parler which purport to be more friendly to conservatives.

180 *Disclosing use of altered or synthetic content—YouTube Help*. (2024). YouTube Help. [https://support.google.com/youtube/answer/14328491#examples\\_as](https://support.google.com/youtube/answer/14328491#examples_as) [perma.cc/6UF3-723S]

181 Bickert, M. (2024, April 5). Our Approach to Labeling AI-Generated Content and Manipulated Media. *Meta Newsroom*. <https://about.fb.com/news/2024/04/metasp-approach-to-labeling-ai-generated-content-and-manipulated-media/> [perma.cc/HD6T-YV4D]

182 Nicholas, G. (2024, August 15). Red Teaming Isn’t Enough. *Foreign Policy*. <https://foreignpolicy.com/2024/07/08/artificial-intelligence-ai-election-misinformation-technology-risks/> [perma.cc/V9H3-EYYP]

183 Brennen, S. B., & Perault, M. (2023). *The new political ad machine: Policy frameworks for political ads in an age of AI*. Center on Technology Policy at UNC-Chapel Hill. <https://techpolicy.unc.edu/wp-content/uploads/2023/11/GAI-and-political-ads.pdf> [perma.cc/98YR-8E2P]

184 Binford, M. T., Wojdyski, B. W., Lee, Y.-I., Sun, S., & Briscoe, A. (2021). Invisible transparency: Visual attention to disclosures and source recognition in Facebook political advertising. *Journal of Information Technology & Politics*, 18(1), 70–83. <https://doi.org/10.1080/19331681.2020.1805388>

185 Dobber, T., Kruikeimeier, S., Helberger, N., & Goodman, E. (2023). Shielding citizens? Understanding the impact of political advertisement transparency information. *New Media & Society*, 14614448231157640. <https://doi.org/10.1177/14614448231157640>

When selecting companies to include in this report, we sought to include Truth Social to explore how alternative social media platforms handle political ads. Truth Social was launched in 2022 by the Trump Media and Technology Group, following former President Trump's ban from several major social media companies, including Meta (then Facebook) and Twitter.

While we initially intended to analyze Truth Social's political advertising policies as part of this report, the company has not published any such policies, nor did company representatives respond to CDT's repeated outreach efforts. Truth Social provides one informational webpage for advertisers (political or other), which suggests that ads can be targeted to specific audiences via location and device type.<sup>186</sup> It is otherwise unclear whether political advertisers undergo a verification process, whether "paid for by" or genAI disclosures are required, whether deceptive or harmful content is banned, or if political ads undergo any review process. Truth Social does not have a publicly available ads repository.

While the platform does not publish any policies publicly, it does provide an FAQ on moderation.<sup>187</sup> This suggests that Truth Social does have some guidelines on permissible versus impermissible content. News reports and a study conducted by Public Citizen have found that the platform engages in content moderation and has even banned user accounts, including one that mimicked company CEO Devin Nunes.<sup>188, 189, 190</sup>

At minimum, the introduction of Truth Social in 2022 exemplifies the trend of the 'balkanization' or 'splintering' of the social media landscape – where once internet users convened socially on a handful of platforms, they now are spread out across a constellation of platforms. Some platforms attract politically aligned users, such as Truth Social, Parler and Gab. Other platforms offer increased data and privacy protections, such as the decentralized Twitter-lookalikes Mastodon and Bluesky.<sup>191</sup> This splintering has the potential to fragment the information environment around elections: creating echo chambers for internet users, while complicating efforts by election officials and fact-checkers to monitor election misinformation.<sup>192</sup>

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186 *Advertise with Truth Social*. (2024). Truth Social. <https://truthsocial.com/advertising>

187 *Questions on Moderation?* (2024). Truth Social. <https://help.truthsocial.com/faq/faq-moderation/>

188 *What we know about Truth Social, Donald Trump's social media platform*. (2024, March 27). <https://apnews.com/article/truth-social-donald-trump-djt-ipo-digital-world-7437d5dcc491a1459a078195ae547987>

189 Hunt-Majer, C. (2022). *Truth Can't Handle the Truth*. Public Citizen. <https://www.citizen.org/article/truth-cant-handle-the-truth/> [perma.cc/3E98-KKP3]

190 Binder, M. (2022, February 22). Truth Social is already censoring content and banning user who made fun of Trump Media CEO. *Mashable*. <https://mashable.com/article/trump-truth-social-free-speech-bans> [perma.cc/8MLM-YUD6]

191 Budington, B. (2022, December 9). *Is mastodon private and secure? let's take A look*. Electronic Frontier Foundation. <https://www.eff.org/deeplinks/2022/11/mastodon-private-and-secure-lets-take-look> [perma.cc/PW3V-QY2C]

192 Kitchens, B., Johnson, S. L., & Gray, P. (2020). Understanding Echo Chambers and Filter Bubbles: The Impact of Social Media on Diversification and Partisan Shifts in News Consumption. *MIS Quarterly*, Vol. 44 (No. 4), 1619–1649. [https://doi.org/https://www.darden.virginia.edu/sites/default/files/inline-files/05\\_16371\\_RA\\_KitchensJohnsonGray%20Final\\_0.pdf](https://doi.org/https://www.darden.virginia.edu/sites/default/files/inline-files/05_16371_RA_KitchensJohnsonGray%20Final_0.pdf)

## ***Equal and equitable enforcement is critical***

In addition to assessing policy language, we also examined companies' enforcement plans for their political ads policies. The companies often employ a combination of automated processes (i.e., machine learning classifiers) and human review to detect non-compliant content. To identify undisclosed political ads, Google works with third parties to compile lists of political candidates and related keywords, such as nicknames. Meta maintains a similar database, which it refers to as a "civic graph." Both Snap and Reddit subject all political ads to human review, reflecting these platforms' comparatively smaller scale.

As for deepfakes and other deceptive usage of generative AI, many of the companies noted that they have not yet seen much use of this emerging technology in political ads. This is consistent with recent news coverage, which has reported that while concerns about the proliferation and manipulative impact of AI-generated misinformation are growing, actual instances of such content still appear to be rare.<sup>193</sup> Relatedly, several companies expressed confidence in their ability to detect undisclosed use of generative AI. However, researchers argue that the technology used to detect and label AI-generated content is still developing and prone to error, particularly when evaluating novel political speech and misinformation, speech in non-English languages, and content depicting faces with different skin tones and gender identities.

Third-party researchers have found shortcomings in social media companies' ability to consistently apply and enforce their own rules. Tech non-profit AI Forensics found that Meta failed to identify political ads targeting French and German audiences with Russian-aligned messaging related to Ukraine.<sup>194</sup> The unlabeled political ads reached 38 million Facebook users in six months. The Mozilla Foundation and the Briefing have found that on TikTok, political ads routinely evade the company's enforcement systems, particularly "influencer advertising" where political campaigns pay creators on the TikTok platform to share campaign messages.<sup>195, 196</sup> The Center for Countering Digital Hate identified 50 posts from X's Chairman Elon Musk which contained election misinformation.<sup>197, 198</sup> None of the 50 posts, however,

193 Fischer, S., & Morrone, M. (2024, July 22). The AI-generated disinformation dystopia that wasn't. *Axios*. <https://www.axios.com/2024/07/22/ai-deepfakes-trump-news-misinformation>

194 *No Embargo in Sight: Meta Lets Pro-Russia Propaganda Ads Flood the EU*. (2024). AI Forensics. <https://aiforensics.org/work/meta-political-ads> [perma.cc/JVC3-ZN5C]

195 *These are "not" political ads*. (2022). Mozilla. <https://foundation.mozilla.org/en/campaigns/tiktok-political-ads/research-findings/>

196 Carolan, L. (2024). *Investigation: TikTok is failing to comply with EU rules on political ads*. The Briefing. <https://www.thebriefing.ie/tiktok-is-failing-to-comply-with-eu-rules/> [perma.cc/YF6Y-TP3R]

197 *Musk misleading election claims viewed 1.2bn times on X - with no fact checks*. (2024). Center for Countering Digital Hate. <https://counterhate.com/research/musk-misleading-election-claims-viewed-1-2bn-times-on-x-with-no-fact-checks/> [perma.cc/XP7B-ZXD2]

198 In 2023, X Chairman Elon Musk [sued](#) the Center for Countering Digital Hate (CCDH), claiming that the nonprofit intentionally spread falsehoods about the social media company. The court case, however, was [dismissed](#) in March 2024.

received a “Community Note” to correct the inaccuracies.<sup>199</sup> Musk has also shared an AI-manipulated video of Vice President Kamala Harris, then the presumptive Democratic nominee, in apparent violation of X’s own synthetic and manipulated media policy.<sup>200</sup>

These findings highlight the ongoing challenges social media companies face when it comes to policy enforcement. More independent research, increased data access, and comprehensive third-party audits are crucial to fully understand these enforcement gaps and their potential impact on the election information environment.

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199 Ingram, D. (2024, August 8). Elon Musk’s misleading election claims have accrued 1.2 billion views on X, new analysis says. *NBC News*. <https://www.nbcnews.com/tech/misinformation/elon-musk-misleading-election-claims-x-views-report-rcna165599> [perma.cc/VF8C-K73X]

200 Bensinger, K. (2024, July 28). Elon Musk Shares Manipulated Harris Video, in Seeming Violation of X’s Policies. *The New York Times*. <https://www.nytimes.com/2024/07/27/us/politics/elon-musk-kamala-harris-deepfake.html>

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**Find out more about CDT's Future of Online Advertising Project at [cdt.org/online-advertising](https://cdt.org/online-advertising).**

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