



DISINFORMATION AS A BUSINESS: BUSINESS MODEL OF THE POLISH DISINFORMATION SCENE

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INTRODUCTION

While disinformation is not a novel phenomenon, the advent of the internet and, more specifically, social media platforms has granted it unprecedented reach. When paired with the digital programmatic marketplace, social media platforms become a potent tool for nefarious entities aiming for widespread dissemination, targeted audiences and substantial profits.

Further complicating the digital landscape are the murky operations of ad-tech companies. With some facilitating transactions between buyers and sellers and others focusing on gathering, consolidating and selling data, the digital ad industry often functions as a complex, non-transparent system. This evolving digital milieu, marked by ambiguity and opacity, has become a fertile ground for those peddling deception and falsehoods and is often an overlooked aspect of disinformation, particularly in Poland.

A [recent study by the Global Disinformation Index](#) (GDI) illuminates the growing profitability of disseminating disinformation online. The GDI's analysis encompassed the web traffic and user metrics of approximately 20,000 domains suspected of promoting disinformation. Findings indicate that these domains garnered an impressive \$235 million from advertising revenues alone in 2019.

In light of these insights, it is paramount that both policymakers and the public understand the full scale of the disinformation industry. Beyond strategic motives, there lies a vast, intricate web of financial incentives driving the spread of falsehoods. The synthesis of technological advances and economic opportunities has inadvertently created an ecosystem conducive to the spread of disinformation. Focusing solely on the content or the perpetrators is no longer sufficient as we move forward. A holistic approach that targets the economic engines powering these campaigns is essential to effectively combat and curtail this digital-age challenge, especially in regions like Poland that find themselves at the crossroads of information warfare.

In this report, we undertake a systematic analysis of the financial side of disinformation in Poland in tandem with the work done by the [Prague Security Studies Institute](#) (PSSI) for Czechia. We focus not only on its profitability but also on the diverse business models that sustain it. Alongside the work done by the Prague Security Studies Institute for Czechia, one of our key objectives is to identify and categorise these models, as well as to explore the significant role that advertising revenue plays in the ecosystem.

To provide these insights, we analyse some of the most extensive disinformation-propagating domains in Poland, calculating potential advertising revenues from May to July 2023. This approach sheds light on the economic underpinnings of disinformation campaigns and aims to equip readers with a comprehensive understanding. We aim to shift the public and policy focus from merely analysing the content to understanding the monetary motivations driving this clandestine industry in Poland.

METHODOLOGY

Our research methodology was inspired by PSSI's original approach but tailored to dissect the financial structures of disinformation in Poland. A primary shared goal between our studies is to delve into the financial dynamics of the disinformation landscape rather than labelling platforms as disinformation sources.

To select our study websites, we followed a methodology reminiscent of the [konšpirátori.sk](#) approach, revered for its transparency and expert backing. Similar filtering criteria were applied, including publishing

language, domain functionality and recent activity. The key difference was our inclusion of Telegram channels, given their growing role in Poland's disinformation landscape, especially with websites facing challenges from public-private partnerships. This addition posed unique analytical challenges given Telegram's non-transparency and regulatory environment.

In terms of financial sources, we observed parallels with the Czech ecosystem, where ad revenues and voluntary contributions were predominant. Our team analysed transparent bank accounts associated with these platforms, mirroring PSSI's method. While some platforms offered readily accessible financial data, others required manual calculations to decipher their financial trajectories.

A crucial aspect of our methodology was estimating ad revenue, especially for platforms utilising automated advertising. Collaborating with media and ad-tech experts, our approach mirrored PSSI's, where website visits, ad boxes and revenue per thousand impressions factored into our calculations. Given the constraints of utilising open-source data, our estimates aimed to be as accurate as possible.

Our study also classifies the platforms' business models, drawing insights from the Czech study. We categorised platforms into types (Preachers, Businessmen, Healers, and Esoterics) but adjusted for the Polish context. Our classification was determined by various indicators, such as:

- Topical focus: whether it was socio-political or health and lifestyle-oriented.
- Diversity and nature of financial sources.
- Capability to generate income.
- Underlying motivation: whether primarily ideological or financially driven.

It's essential to note that while our methodology derived inspiration from PSSI's approach, it's been significantly adapted to cater to the unique dynamics of Poland's disinformation landscape and the platforms operating within it.

THE FINANCIAL GAP IN COMBATTING DISINFORMATION IN POLAND

Poland has faced escalating disinformation challenges since 2014, with notable spikes during geopolitical events such as Russia's Crimea invasion, the COVID-19 pandemic and the ongoing issues at the Belarus-Poland border. While state-led initiatives have shown some effectiveness, they've mainly targeted individual perpetrators and misinformation narratives. Deporting persons linked to disinformation and blocking certain media outlets are steps taken by state apparatuses like the Polish Internal Security Agency (ABW) and the National Broadcasting Council (KRRiT).

A dedicated government portal exists to counter disinformation campaigns, and other agencies like the Government Security Center (RCB) and the NASK Computer Science Institute are actively debunking fake narratives. However, these efforts lack a coordinated approach to tackle the financial underpinnings of disinformation, creating a noticeable gap in Poland's strategy.

Despite some level of cross-sectoral infrastructure to raise awareness about digital threats, Poland has not yet explored defunding as a tool against disinformation. This is evident as Poland has not fully implemented measures outlined in the European Digital Services Act, particularly around the transparent appointment of a national digital services coordinator. Additionally, there are no existing mechanisms to demonetise online disinformation and hate speech. This leaves a financial vacuum that allows the disinformation ecosystem to flourish.

Given that defunding can be a potent weapon in curtailing the spread of disinformation, there's a pressing need for Poland to consider this approach. The absence of a strategy to hit disinformation where it hurts most – financially – represents a significant loophole in Poland's overall defensive measures against digital threats.

The Role of the Private Sector and Civil Society

In Poland, the battle against disinformation is often spearheaded by private organisations and not directly by the state. While state-supported, the onus frequently falls on independent organisations and private bodies that offer services like media literacy training or fact-checking. For example, media literacy initiatives have often been championed by private entities such as the Empowering Children Foundation and the Research and Academic Computer Network (NASK). This has resulted in the third sector – non-government and civil society – taking up a leadership role, especially given the absence of a structured state-led media literacy framework.

Private sector involvement extends to financial strategies as well. Major tech companies, such as Google Poland, have played a role by limiting the reach of disinformation channels like RT and Sputnik on YouTube within Poland. This is part of a broader European trend where governments collaborate with tech giants like Facebook, Twitter and Google to combat disinformation, often by demonetising false content or ads from misleading websites. This directly impacts the funding of disinformation agents, causing some, like Russian propagandists, to migrate to less-regulated platforms like Telegram. This migration informed our decision to monitor disinformation channels on Telegram.

Unlike some countries, where companies directly engage in media literacy activities – for instance, T-Mobile in Czechia – Polish companies usually form strategic partnerships with specific foundations and organisations to combat disinformation. One notable example is the Digital Poland Foundation, which partners with VISA, T-Mobile, UPC, TVN, Microsoft, Schneider Electric and KPMG. These collaborations result in various initiatives like free online digital courses, hackathons, lectures, webinars and workshops, all aimed at enhancing media literacy and fighting disinformation.

Even though there have been some high-profile cases, such as the far-right group Confederation (Konfederacja) being removed from Facebook for spreading COVID-19 misinformation, they still find platforms like TikTok to disseminate their content. TikTok, however, has taken steps to flag some of this misleading content, appending warnings to encourage viewers to “learn the facts about COVID-19.”

Civil Society Leadership in Combatting Disinformation

In Poland, the fight against disinformation is shouldered mainly by civil society initiatives that span a variety of activities, from fact-checking to media literacy campaigns. Notable organisations include the Demagog Association, a prominent fact-checking platform and #WłączWeryfikację, led by NASK (National Academic Computer Network), which debunks fake news. Additional contributions come from Fundacja ePaństwo, Modern Poland Foundation and Empowering Children Foundation, each bringing unique approaches to transparency, media literacy and public awareness about communication technologies.

Several independent portals, such as OKO.press, conduct rigorous fact-checking and investigative journalism. Collaborative initiatives also exist, like Media Against Disinformation, a coalition of media outlets

dedicated to high journalistic standards. Educational programmes like Teaching Media in Schools are working to empower students with critical media assessment skills.

However, the landscape is not static; it continually evolves. New organisations are sprouting up, and existing ones are adapting their focus in response to the ever-changing disinformation threats. Many of these Polish organisations also form part of broader international initiatives, such as Sleeping Giants (US), Stop Funding Hate (UK), Global Disinformation Index, NELEŽ (GET REAL) in the Czech Republic and konšpi-rátori.sk in Slovakia. These international collaborations provide opportunities to amplify the impact of combating disinformation.

Yet, despite these efforts, a glaring gap exists in Poland's approach. Unlike international initiatives that focus on defunding disinformation by raising awareness among the private sector and advertisers, such strategies are largely absent in Poland. The onus of creating a network of responsible advertisers has not been a part of the country's strategy against disinformation, a lacuna this research aims to highlight.

THE LUCRATIVE WORLD OF ONLINE DISINFORMATION AND ITS AMPLIFICATION

Business Model Categorisation and Analysis

The initial overview of our sample indicates that digital media platforms are actively engaging in profit-generating activities. This is seen more prominently among websites, which leverage various revenue streams such as advertising, e-commerce and reader contributions. However, not all platforms have equal financial success, which often aligns with their chosen business models and target audiences.

Criteria for Classification:

- Topical Area: The primary subject matter the website is devoted to, such as health-lifestyle or socio-political topics.
- Motivation to Operate: Determined based on the funding methods used. The motivations could be ideological or primarily for financial profit.
- Funding Sources: A wider variety of funding sources, including advertising revenue, indicates a higher probability of financial motivation.
- Additional evidence, such as interviews with website owners and existing research, was also considered.

Websites like Wolne Media and TV Republika exemplify this, attracting massive traffic and building a loyal audience base. Lega Artis reports an average of 8.68 million visits. Wolne Media reports an average of 3.65 million visits and has 24K followers on Facebook. In contrast, TV Republika garners 3.609 million visits and has a much larger Facebook following of 186K. This variation suggests that platforms with diverse business models are not only effective in drawing web traffic but also excel in converting this into a loyal, engaged audience.

The most recurring business model in our dataset is the 'Preachers' category, indicating a strong ideological motivation behind many websites and TG channels. However, the 'Businessmen' category is most noteworthy due to its impactful reach and successful monetisation strategies.

- **Preachers:** This is the most prevalent category among both websites and TG channels, but their approach to monetisation differs. Websites in this category like Wolne Media and Wolnosc.TV has many visits but less emphasis on multiple revenue streams. Most rely solely on reader contributions. TG Channels in this category have sizable subscriber numbers but don't seem to employ monetisation strategies. Wolne Media and Wolnosc.TV falls into this category and shares similarities in their limited approach to revenue streams. Lega Artis (8.68 million average visits) and Wolne Media (3.65 million average visits) stand out for relying solely on reader contributions. This suggests an untapped potential for diversification.
- **Businessmen:** This category is significant due to its successful monetisation strategies. Websites like Lega Artis, TV Republika and wPrawo.pl not only garner significant traffic but also diversify their income through advertisements, e-shops and even publishing houses. No TG channel in our sample has demonstrated a similar multidimensional approach to business. TV Republika's expansive approach towards monetisation is notable. The website not only has an e-shop but also engages in the sale of printed press. This suggests a multi-channel approach to revenue, combining both online and offline strategies.
- **Others (Esoterics, Healers):** These categories are less frequent but notable for their unique monetisation strategies. The website 'Racionalista' from the 'Esoterics' category has an e-shop and reader contributions. The e-shop could be a significant driver for community engagement, selling items that resonate with the platform's core audience.

	Ideological Motivation	Financial Motivation
Health and Lifestyle Topics	Esoterics: Websites focused primarily on health and lifestyle topics; established and publishing because of an intrinsic belief	Healers: Websites focused primarily on health and lifestyle topics; established and publishing primarily to generate revenue or to support other income-generating activities
Socio-political Topics	Preachers: Websites focused primarily on socio-political issues; established and publishing to disseminate certain ideological views (or propaganda)	Businessmen: Websites focused primarily on socio-political issues; established and publishing primarily to generate profit or to support other income-generating activities

Several interesting trends emerge from this initial classification. First, regarding revenue diversity, wPrawo.pl is perhaps the epitome of revenue diversity among the websites. This site not only averages 578,052 visits but also engages in a multitude of monetisation methods, including readers' contributions, sales of the printed press, running an e-shop, paid content and even a publishing house. This not only reduces their dependency on a single income source but likely also increases their stability and resilience against market fluctuations.

Secondly, websites like TV Republika have a substantial Facebook following (186K), which is almost five times that of Wolne Media (24K), despite a smaller number of average visits. Websites like Wolne Media show that high engagement (3.652 million visits) doesn't always translate into diverse revenue streams. In contrast, wPrawo.pl, with fewer visits (578,052), has multiple revenue avenues.

	Ideological Motivation	Financial Motivation
Health and Lifestyle Topics	Esoterics: Racionalista	Healers: Jerzy Zeiba
Socio-political Topics	Preachers: Wolne Media, Wolnosc.TV, Fundacja Nautilus, NWK24, Konfederacja Korony Polskiej, Polskie Drogi, Glos gminny, Straznicy Wolnosci, Ciezka Artyleria	Businessmen: wPrawo.pl, Lega Artis, Tv Republika

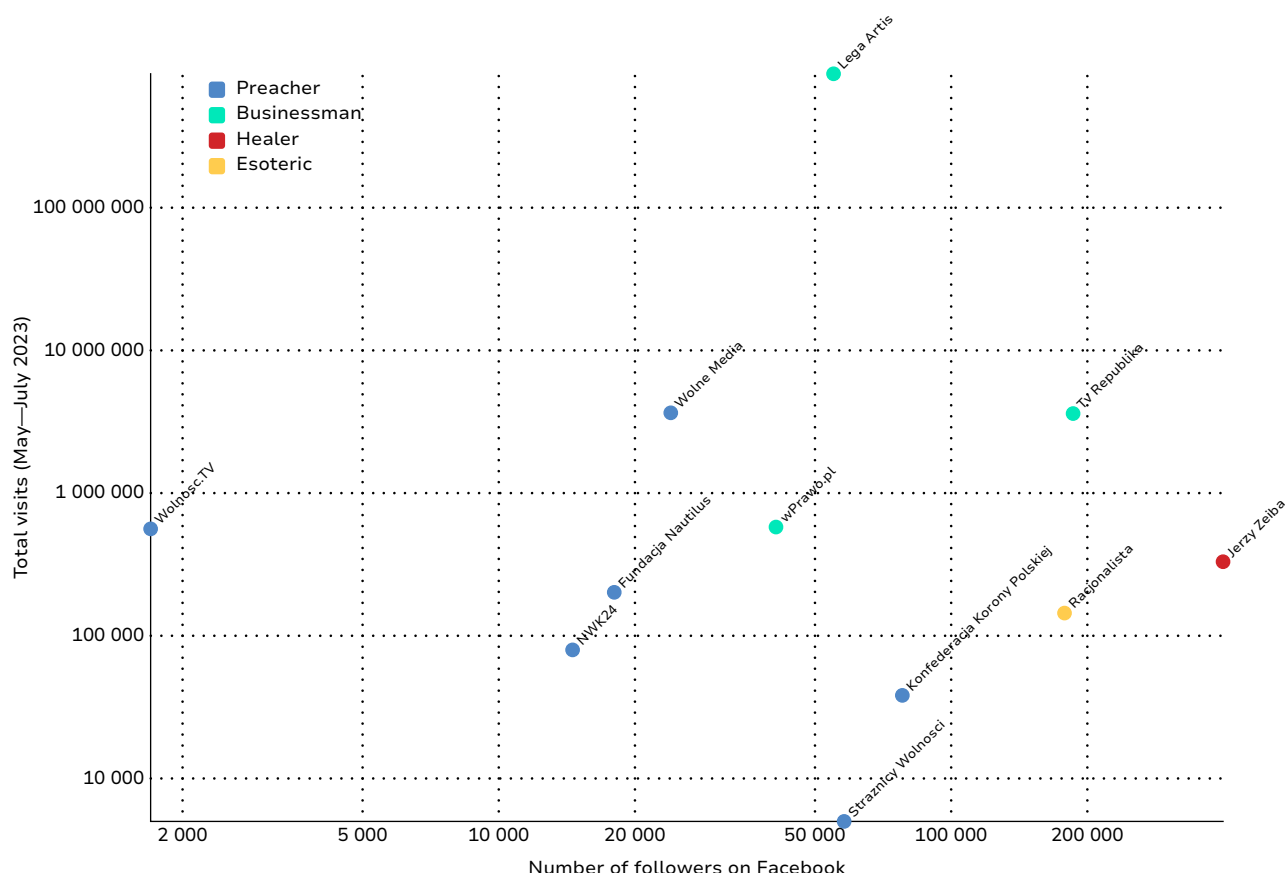
Website Business Models - Differences and Similarities with Telegram Channels

Websites and TG Channels (Telegram Channels) present a fascinating contrast. While websites appear multifaceted in their revenue-generation methods, TG Channels are primarily focused on content dissemination without a direct revenue focus.

Interestingly, advertising is more pervasive among websites. For instance, TV Republika and wPrawo.pl, falling under the 'Businessmen' category, have an average of over 2 million visits and substantial numbers of followers on Facebook while also utilising ads for revenue. In contrast, TG Channels, regardless of their large subscriber counts, don't seem to capitalise on advertisements. This could potentially indicate that TG Channels are either more content-focused or are yet to explore monetisation strategies effectively. The most striking finding from the TG Channel table is the lack of advertising across all major channels. Even for 'endilluminati' with 56,834 subscribers and 'kaka2708' with 30,183 subscribers, the 'Advertisements' column reads 'No' (see Annex, Table 2 for more information). This could either be a missed revenue opportunity or a strategic decision to maintain subscriber engagement, a point that needs further research.

It's worth mentioning that TG Channels also have a large audience, but the focus there seems to be more ideological, given that the 'Preachers' category is dominant. The absence of advertising could indicate either a lack of interest in or a philosophical stance against commercial monetisation, focusing instead on message dissemination.

A good case in point is how niche interests and community engagement can drive the disinformation industry. One example is "Racionalista", a platform within the Esoterics category that has garnered a considerable Facebook following of 70K despite having fewer website visits. This pattern hints at a dedicated community that prefers to engage through social media. Similarly, up-to-date content, as demonstrated by wPrawo.pl, catalyses sustained user engagement, affirming the importance of timeliness in content delivery.



The Double-Edged Sword of Advertising Revenue

Advertising has become an indispensable revenue stream for digital media platforms. For example, TV Republika, with a monthly ad revenue of 21,257.01 PLN and 3.609 million total visits from May to July 2023, underscores the lucrative potential of this income source. Yet, the landscape is nuanced; high traffic doesn't automatically lead to high ad revenue. Wolne Media, which saw a 60% uptick in visits to 3.652 million, consciously opted out of automated ads, exemplifying how platforms may diverge in their advertising strategies.

Another layer of complexity is compliance with advertising regulations. For instance, Lega Artis, with 12,665.85 PLN in ad revenue and wPrawo.pl, earning 878.64 PLN, both have multiple ads on their platforms. Yet, it remains an open question whether these platforms fully adhere to legislation on proper ad labelling and disclosure of paid partnerships. This lapse could erode audience trust and create legal complications.

The profitability of ad revenue varies significantly across platforms. Websites like Racjonalista generate 441.20 PLN from self-advertisements despite only 144,227 visits. On the other end of the spectrum, Wolnosc.TV and Jerzy Zeiba generated merely 640 PLN and 346.47 PLN, respectively, despite visits surpassing 330,000. This variance underscores that ad revenue is not strictly a function of site visits but relies heavily on the effectiveness of the advertising model adopted.

In terms of advertising strategies, some platforms take a measured approach. wPrawo.pl and Wolnosc.TV, which have moderately displayed ads, demonstrate comparable revenue outcomes despite slight differences

in traffic. In contrast, niche platforms like NWK24 and Jerzy Zeiba show that even with lower traffic, some revenue can be generated, however modest. Moreover, platforms like Polskie Drogi, despite low visit numbers, potentially offer a unique value proposition due to their high page-per-visit ratio. Notably, platforms like Fundacja Nautilus and Konfederacja Korony Polskiej completely abstain from advertisements, relying instead on other revenue streams such as donations or subscriptions, indicating the diversity of revenue-generating strategies.

List of Websites: Income - Advertisement

Website name	Advertisement	Automatized	Other Types of Ads	Monthly revenue
Lega Artis	Yes	Yes	Yes	12,665.85 PLN
Tv Republika	Yes	Yes	Yes	21,257.01 PLN
Wolne Media	Yes	No	Yes	N/A
wPrawo.pl	Yes	Yes	Yes	878.64 PLN
Wolnosc.TV	Yes	Yes	Yes	640 PLN
Jerzy Zeiba	Yes	Yes	Yes	346.47 PLN
Fundacja Nautilus	Yes	No	Yes	N/A
Racjonalista	Yes	Yes	Yes	441.20 PLN
NWK24	Yes	Yes	Yes	134.33 PLN
Konfederacja Korony Polskiej	No	No	No	N/A
Polskie Drogi	Yes	Yes	Yes	47.68 PLN
Glos gminny	Yes	No	Yes	N/A
Straznicy	Yes	No	Yes	N/A
Ciezka Artyleria	No	No	No	N/A

Voluntary Contributions

A striking difference emerges in the adoption of voluntary contributions as a source of income between Telegram channels and the list of websites above. Most listed websites opt for voluntary contributions – 11 out of 14 listed sites – whereas the Telegram channels largely avoid this approach, with only 5 out of 59 employing it. However, neither the websites nor the Telegram channels seem to prioritise transparent accounting, as all entries in both tables indicate “No” for having a transparent account. This could imply that while websites are more open to community-supported models, Telegram channels might rely on different revenue streams, potentially due to their nature or audience expectations.

The absence of transparent accounts across both platforms raises questions about financial accountability. Of note is one Telegram account (https://t.me/ndp_pl), which had its other Telegram account blocked, and their website was also blocked during this research.

Case Studies

Disinformation is more than just a manipulative tool in the socio-political arena; it operates as a full-fledged industry driven by complex networks and intricate profit motives. By delving into a series of compelling case studies – from the commercial-driven operations of TV Republika to the esoteric rationalism

of the Racjonalista website, the intricate web of The Businessmen, and the misleading health claims of The Healer – we aim to unravel the deep-seated interconnections between the realms of disinformation and the private sector. Each case elucidates how entities adeptly exploit both media influence and financial prowess, navigating the delicate balance between authentic information sharing and potential deceptive practices.

The Businessmen

As the purpose of this study is to highlight the lucrative side of the disinformation industry, we investigated more closely the website TV Republika. An indispensable revenue stream for this digital media platform is through advertising. TV Republika rakes in roughly 21,257 PLN of monthly ad revenue. The website encapsulates the model of businessmen due to how it advertises through automated ads, as opposed to Wolne Media, which opts out of automated ads but relies more heavily on individual contribution.

We found a Polish company that owns TV Republika entitled Alphanet sp. z o.o., headquartered in Sosnowiec, Poland. Alphanet appears to be a diversified media conglomerate that owns an array of websites that published on varied subjects – from coal (pgg.pl) to hiking trails in the mountains (mapa-turystyczna.pl) and even on Asperger's syndrome and intellectual disability (pressmania.pl). This range of subjects underscores the perception that TV Republika operates more as a commercial enterprise than out of profound ideological beliefs.

Erich Syrovatka emerges as a key player in Alphanet's corporate network, with business ventures like "INTERNET SK, s.r.o" in Slovakia and "INTERNET CZ, a.s." in Czechia. He has also been an executive at several now-defunct Czech companies, including ASPone, s.r.o., and GENERAL REGISTRY, s.r.o. GR HOLDING.

Intriguingly, the actual owners of INTERNET CZ, s.r.o. and ASPone, s.r.o., as of December 2019, are Italians Giorgio Cecconi, Alessandro Cecconi, Stefano Cecconi and Susanna Santini. Stefano Cecconi is particularly notable for his role as the legal head of Aruba S.p.A., a leading IT data centre and web hosting service provider in Europe. Roman Rajmund Lissok is another name associated with Alphanet, although his specific role is not clearly outlined.

While the exact financial metrics of Alphanet are not publicly available, its diverse range of media outlets, including Wolne Media, suggests multiple income streams. These could vary from ad revenues on their news websites to potential subscription or donation-based services on specialised platforms. No direct evidence ties Alphanet or Erich Syrovatka to the disinformation circuit in Czechia. However, Alphanet's broad media influence, especially when factoring in Syrovatka's businesses in Slovakia and Czechia and the ownership of Wolne Media, implies a capability for wide-scale content dissemination, including potential disinformation.

This updated case study, along with the visualisations, aims to bring to light the intricate mesh of connections around Alphanet, which could serve as potential channels for distributing either information or disinformation across Poland and beyond.

The Esoteric

The lone esoteric category belongs to the Racjonalista website, which covers a diverse array of topics but is specifically geared towards promoting rationalism and secular thought. LH.pl Sp. z o.o. is a Polish company best known for operating the Racjonalista website. The principal figure behind LH.pl Sp. z o.o. is Marek

Robert Panek, who serves as the board's chairman. His corporate involvements are expansive, as he is on the board of multiple other companies:

- THECAMELS SP. Z O.O., ŁÓDŹ
- KYLOS SP. Z O.O., ŁÓDŹ
- MILEWKO SOLAR PARK SP. Z O.O., POZNAŃ
- WELASTIC SP. Z O.O., POZNAŃ
- EUROVOLT SP. Z O.O., ŁOMŻA
- GENOVO SP. Z O.O., POZNAŃ

Interestingly, Marek Panek's business ventures are not limited to Poland; he has registered companies in Cyprus, such as GENOVO LIMITED. The company is registered with Marek Robert Panek listed as Director, suggesting an extensive and international business network. The specific financial details of LH.pl Sp. z o.o. and Racjonalista are not readily available. However, given Marek Panek's widespread business engagements, it's reasonable to surmise that he has various income channels. This may afford him significant financial leverage to influence public discourse through the Racjonalista platform.



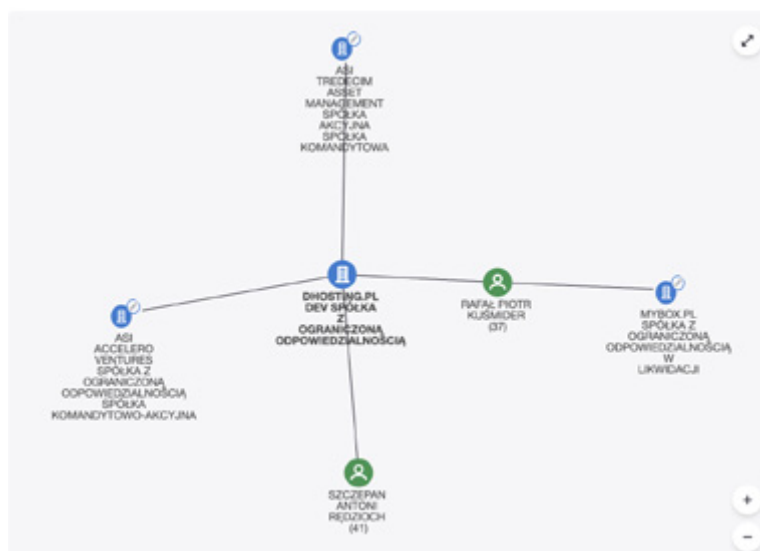
The Preacher

An interesting trend seen in the Preacher category is that the website is often redacted for privacy in organisational databases. This is the case for both Wolnosc.TV and Wolne Media. The latter does have an owner listed on the website, but it is a pseudonym that cannot be tracked down. Therefore, we found one of the Preacher sites, NWK24.pl that could serve as a good case study.

NWK24.pl is owned by dhosting.pl Sp. z o.o., a Warsaw enterprise specialising in a myriad of online services, from data processing to hosting, from computer programming and consultancy to advertising, market research and even segments of education and repair services. At the top of the company is Rafał Piotr Kuśmider. He is the CEO of dhosting.pl and mybox.pl, while also being the Chairman of the Board for both dhosting.pl DEV and dhosting.pl RND – two vital offshoots of the primary dhosting brand.

More recently, the website has witnessed an impressive surge in its digital footprint. From a relatively modest less than 5,000 visits in March-May 2023, their traction skyrocketed to an astounding 79,619 total visits in the following three months. It will be interesting to see whether or not this website will turn from the

Preacher category to the Businessmen category once they have a much more established readership. The versatility of their services, while beneficial for a holistic business model, potentially allows them to influence various facets of the online experience, from the information one accesses to the security protocols they rely upon.



The Healer

The website dedicated to Jerzy Zięba operates under the ownership of Instra Corporation Pty Ltd., an international company focusing on domain name registration and web services. The registrant contact for this company is located in Alexandria, Virginia, while the newsletter service is headquartered in Warsaw. Jerzy Zięba is a controversial figure in Poland, positioning himself as an independent journalist, writer and alternative medicine advocate. He has over 400K followers on Facebook. Zięba has been a vocal advocate for using sodium ascorbate in treating COVID-19, asserting claims that lack scientific backing. He promotes the idea that an underground community in Poland, including hairdressers and firefighters, secretly uses sodium ascorbate for treatment, thereby fueling misinformation.

Regarding the financial backing of such claims, Zięba is the ambassador for VISANTO brand supplements, which often become a cure for many of the ailments he references on his social media channels and website. His content focuses on new-age health medicine mixed with freedom and social liberty. He also gets additional income from book sales, seminars and other digital products related to his teachings. While his ad revenue is not substantive (346.47 PLN monthly), it is widely assumed that he uses his website to advocate his position, leading to customers buying his products. Over 330,350 visitors per month come to his website alone.

RECOMMENDATIONS

The landscape of disinformation in Poland is a dynamic and evolving arena, one that operates at the intersection of technology, psychology and economics. As our report demonstrates, efforts to curb the spread of disinformation in Poland have primarily focused on content moderation and penalising individual disseminators. While these initiatives have borne some fruit, they only tackle a part of the problem. A significant gap exists in addressing the financial incentives that fuel disinformation.

We have seen how diverse business models, from the ideologically driven “Preachers” to the profit-seeking “Businessmen”, exploit gaps in regulation and oversight to generate revenue. The digital ad industry’s opaque nature exacerbates this issue, inadvertently directing large sums of money to these platforms. The migration of disinformation agents to less-regulated platforms like Telegram, due to restrictions on mainstream social media platforms also suggests a game of “whack-a-mole” where addressing the problem in one area leads to its emergence in another.

A comprehensive strategy to counteract the economic underpinnings of disinformation remains noticeably absent in Poland. This vacuum allows for the continued growth of a clandestine industry that threatens the fabric of democratic society. The following recommendations will address this issue.

Recommendation 1:

Establish a National Digital Services Coordinator to Implement the European Digital Services Act

Poland should expedite the implementation of the European Digital Services Act. A transparently-appointed National Coordinator should oversee this, holding platforms accountable and taking steps to demonetise harmful content.

Recommendation 2:

Develop a Real-Time Monitoring and Blacklisting System for Ad Placement

Given the lack of transparency in ad-tech and programmatic advertising, a real-time monitoring system should be set up to evaluate the credibility of domains and Telegram channels. This system would use criteria like content authenticity and disinformation history. Advertisers could then refer to this updated blacklist to prevent ads from appearing on disreputable platforms.

Recommendation 3:

Form a Public-Private Partnership to Reallocate Advertising Spending

A public-private partnership involving government, tech companies like Google Poland, and fact-checking organisations should redirect ad spending from untrustworthy to credible platforms.

Recommendation 4:

Implement an Advertiser Awareness and Education Campaign

Launch an awareness campaign to educate advertisers on the risks of funding disinformation platforms, filling the current gap in media literacy for this group.

Each of these recommendations aims to dismantle the financial incentives that fuel the disinformation industry. By targeting these economic engines, we can better combat the spread of disinformation, not just in Poland but globally.

Given the scale and complexity of this challenge, adopting a holistic approach that focuses on both the perpetrators and their financial enablers is the most effective strategy to combat this digital-age problem.

ANNEX

Table 1: Sources of Income - Websites

Website name	Business model	Average number of visits	Number of followers on Facebook	Advertisement
Lega Artis	Businessman	8.68 million	55K	Yes
TV Republika	Businessmen	3.609 million	186K	Yes
Wolne Media	Businessmen	3.652 million	24K	No
wPrawo.pl	Businessmen	578K	41K	Yes
Wolnosc.TV	Preachers	561K	1.7K	Yes
Jerzy Zeiba	Healers	330K	399K	Yes
Fundacja Nautilus	Preachers	201K	18K	Yes
Racjonalista	Esoterics	144K	178,054K	Yes
NWK24	Preachers	79K	14,561	Yes
Konfederacja Korony Polskiej	Preachers	38K	78K	No
Polskie Drogi	Preachers	6K	Banned	Yes
Głos gminny	Preachers	<5,000	Banned	Yes
Straznicy	Preachers	<5,000	58K	No
Cieszka Artyleria	Preachers	<5,000	Banned	No

Table 1b: Sources of Income (continuation) - Websites

Website name	Voluntary contributions	Sales of printed press	E-shop	Paid content	Publishing house
Lega Artis	No	No	No	No	No
TV Republika	No	No	No	No	No
Wolne Media	Yes	No	No	No	No
wPrawo.pl	Yes	Yes	Yes	Yes	Yes
Wolnosc.TV	Yes	No	No	No	No
Jerzy Zeiba	No	No	Yes	No	No
Fundacja Nautilus	Yes	No	No	No	No
Racjonalista	Yes	Yes	Yes	No	No
NWK24	Yes	No	No	No	No
Konfederacja Korony Polskiej	Yes	No	No	No	No
Polskie Drogi	No	No	No	No	No
Głos gminny	Yes	No	No	No	No
Straznicy	Yes	No	No	No	No
Cieszka Artyleria	Yes	No	No	No	No

Table 2: Sources of Income - Telegram

Telegram channel	Business model	Number of subscribers	Number of followers on Facebook	Advertisement
https://t.me/endilluminati	Businessmen	56,834	N/A	No
https://t.me/kaka2708	Preachers	30,183	N/A	No
https://t.me/wiadomoscizasowostatecznych	Preachers	17,671	N/A	No
https://t.me/kcdindustry	Businessmen	17,391	N/A	No
https://t.me/straznicywolnosci	Preachers	16,256	N/A	No
https://t.me/siostryjasnowidzki	Estoerics	14,421	N/A	No
https://t.me/ndp_pl	Businessmen	12,259	N/A	No
https://t.me/polska_grupa_informacyjna	Preachers	11,923	N/A	No
https://t.me/infokju	Preachers	9,831	N/A	No
https://t.me/EwaranonPoPolsku	Preachers	8,654	N/A	No
https://t.me/nwk24pl	Preachers	7,169	N/A	No
https://t.me/Olej_w_Glowie	Preachers	7,463	N/A	No
https://t.me/infowarpolska	Preachers	6,414	N/A	No
https://t.me/ruchoporupolska	Preachers	6,393	N/A	No
https://t.me/pl_news_front	Preachers	6,167	N/A	No
https://t.me/dostawcy	Preachers	5,837	N/A	No
https://t.me/wprocesiebudzenia	Preachers	5,296	N/A	No
https://t.me/newsfactory_pl	Preachers	5,004	N/A	No
https://t.me/swiatinformacji	Preachers	4,848	N/A	No
https://t.me/polskaamerykanewspolsku	Preachers	4,759	N/A	No
https://t.me/MinisterstwoZdrowiaL	Preachers	4,625	N/A	No
https://t.me/koronaskandalpl	Preachers	4,572	N/A	No
https://t.me/TeorieSpiskowe_321Crypto	Preachers	4,124	N/A	No
https://t.me/ktoslive	Preachers	4,087	N/A	No
https://t.me/mistrzfoliarstwa777	Preachers	3,831	N/A	No
https://t.me/qpolska	Preachers	3,772	N/A	No
https://t.me/conspiracycartoonsandmovies	Preachers	3,614	N/A	No
https://t.me/globalnainfo	Preachers	3,536	N/A	No
https://t.me/RuskiStatek	Preachers	3,492	N/A	No
https://t.me/bodzio30	Preachers	2,748	N/A	No
https://t.me/kubaholistyk	Preachers	2,670	N/A	No
https://t.me/ubojniapolin	Preachers	2,313	N/A	No
https://t.me/JuzCzasNews	Preachers	2,186	N/A	No
https://t.me/CiezkaArtyleria	Preachers	1,827	N/A	No
https://t.me/preperskiazki	Preachers	1,978	N/A	No

Telegram channel	Business model	Number of subscribers	Number of followers on Facebook	Advertisement
https://t.me/polanddaily	Preachers	1,967	N/A	No
https://t.me/potega_swiadomosci	Preachers	1,923	N/A	No
https://t.me/ciezkartyleria	Preachers	1,827	N/A	No
https://t.me/ChazarskaOnuca	Preachers	1,598	N/A	No
https://t.me/war_24022022	Preachers	1,598	N/A	No
https://t.me/wolnoscslowa	Preachers	1,583	N/A	No
https://t.me/czystokrwisici	Preachers	1,516	N/A	No
https://t.me/baubuntu63	Preachers	1,449	N/A	No
https://t.me/zbrodnie_kryminal_afery	Preachers	1,204	N/A	No
https://t.me/wschodni	Preachers	1,084	N/A	No
https://t.me/haplogen	Preachers	1,004	N/A	No
https://t.me/infodefPOLAND	Preachers	983	N/A	No
https://t.me/dobrasprawa	Preachers	976	N/A	No
https://t.me/najnewsy	Preachers	972	N/A	No
https://t.me/demontazusrojtswakluczem19	Preachers	872	N/A	No
https://t.me/polacyvskabbalah	Preachers	735	N/A	No
https://t.me/swiat_jest_inny	Preachers	702	N/A	No
https://t.me/infotrupolonia	Preachers	619	N/A	No

Table 2b: Sources of Income (continuation) - Telegram

Telegram channel	Voluntary contributions	Sales of printed press	E-shop	Paid content	Publishing house
https://t.me/endilluminati	Yes	No	Yes	Yes	No
https://t.me/kaka2708	No	No	No	No	No
https://t.me/wiadomoscizasowostatecznych	No	No	No	No	No
https://t.me/kcdindustry	Yes	No	No	Yes	No
https://t.me/straznicywolnosci	Yes	No	No	Yes	No
https://t.me/siostryjasnowidzki	No	No	No	No	No
https://t.me/ndp_pl	No	No	No	No	No
https://t.me/polska_grupa_informacyjna	No	No	No	No	No
https://t.me/infokju	No	No	No	No	No
https://t.me/EwaranonPoPolsku	No	No	No	No	No
https://t.me/nwk24pl	Yes	No	No	No	No
https://t.me/Olej_w_Glowie	No	No	No	No	No
https://t.me/infowarpolska	No	No	No	No	No
https://t.me/ruchoporupolska	No	No	No	No	No
https://t.me/pl_news_front	No	No	No	No	No

Telegram channel	Voluntary contributions	Sales of printed press	E-shop	Paid content	Publishing house
https://t.me/dostawcy	Yes	No	No	No	No
https://t.me/wprocesiebudzenia	No	No	No	No	No
https://t.me/newsfactory_pl	No	No	No	No	No
https://t.me/swiatinformacji	No	No	No	No	No
https://t.me/polskaamerykanewspolsku	No	No	No	No	No
https://t.me/MinisterstwoZdrowiaL	No	No	No	No	No
https://t.me/koronaskandalpl	No	No	No	No	No
https://t.me/TeorieSpiskowe_321Crypto	No	No	No	No	No
https://t.me/ktoslive	No	No	No	No	No
https://t.me/mistrzfoliarstwa777	No	No	No	No	No
https://t.me/qpolska	No	No	No	No	No
https://t.me/conspiracycartoonsandmovies	No	No	No	No	No
https://t.me/globalnainfo	No	No	No	No	No
https://t.me/RuskiStatek	No	No	No	No	No
https://t.me/bodzio30	No	No	No	No	No
https://t.me/kubaholistyk	No	No	No	No	No
https://t.me/ubojniapolin	No	No	No	No	No
https://t.me/JuzCzasNews	No	No	No	No	No
https://t.me/CiezkaArtyleria	No	No	No	No	No
https://t.me/preperskiazki	No	No	No	No	No
https://t.me/polanddaily	No	No	No	No	No
https://t.me/potega_swiadomosci	No	No	No	No	No
https://t.me/ciezkaartyleria	No	No	No	No	No
https://t.me/ChazarskaOnuca	No	No	No	No	No
https://t.me/war_24022022	No	No	No	No	No
https://t.me/wolnoscslowa	No	No	No	No	No
https://t.me/czystokrwisici	No	No	No	No	No
https://t.me/baubuntu63	No	No	No	No	No
https://t.me/zbrodnie_kryminal_afery	No	No	No	No	No
https://t.me/wschodni	Yes	No	No	No	No
https://t.me/haplogen	No	No	No	No	No
https://t.me/infodefPOLAND	No	No	No	No	No
https://t.me/dobrasprawa	No	No	No	No	No
https://t.me/najnewsy	Yes	No	No	No	No
https://t.me/demontazusrojstwakluczem19	No	No	No	No	No
https://t.me/polacyvskabbalah	No	No	No	No	No
https://t.me/swiat_jest_inny	No	No	No	No	No
https://t.me/infotrumpolina	No	No	No	No	No

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