
AMNESTY INTERNATIONAL

AMR 51/0215/2025

BABEL STREET: LETTER FROM AMNESTY INTERNATIONAL TO BABEL STREET

As part of its research into the United States' use of artificial intelligence (AI)-powered surveillance tools used to monitor migrants, including international students who are speaking up for Palestinian human rights and protesting the ongoing Genocide in Gaza, Amnesty International wrote to companies Palantir Technologies and Babel Street on 10 July 2025 requesting their response to our findings. Babel Street did not respond and the letter that we sent to them is attached below. This is in relation to the press release *USA/Global: Tech made by Palantir and Babel Street pose surveillance threats to pro-Palestine student protestors & migrants*.



Ref: TC AMR 51/2025.6878

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Dear [REDACTED]

RE: BABEL STREET'S LINKS TO THE MONITORING OF ACTIVISTS AND IMMIGRATION ENFORCEMENT IN THE UNITED STATES

I am writing from Amnesty International, an independent global human rights movement of more than ten million people.

Amongst other issues, Amnesty International campaigns to make sure that governments uphold their obligation to protect the rights of refugees, asylum-seekers, and migrants. Amnesty International also campaigns for corporations to respect human rights, given that companies have a responsibility to respect human rights wherever they operate in the world.

The scope and meaning of this responsibility have been articulated in the UN Guiding Principles on Business and Human Rights (UN Guiding Principles). The UN Guiding Principles require all businesses, from small and medium-sized enterprises to large multinational enterprises, to avoid causing or contributing to adverse human rights impacts through their own business activities. Companies should also use their leverage to mitigate and address any such adverse impact that is directly linked to their operations, products or services through their business relationships, including by cooperating in their remediation.¹

In order to meet their corporate responsibility to respect human rights, companies should carry out human rights due diligence to identify, prevent, mitigate and account for how they address any risks or impacts on human rights. The UN Guiding Principles also underscore the importance of communicating externally about how businesses address human rights impacts, particularly when concerns are raised by or on behalf of affected people. Specifically, Principle 21 of the UN Guiding Principles states: "Business enterprises whose operations or operating contexts pose risks of severe human rights impacts should report formally on how they address them. In all instances, communications should... [p]rovide information that is sufficient to evaluate the adequacy of an enterprise's response to the particular human rights impact involved". The corporate responsibility to respect

¹ United Nations Guiding principles on business and human rights, UN Doc. HR/PUB/11/04, 2011
ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf

human rights applies fully and equally to all businesses regardless of their size, and sector, ownership and structure. Furthermore, this responsibility is independent of a State's own human rights obligations and exists over and above compliance with national laws and regulations protecting human rights.²

Amnesty International has reviewed documentation detailing Babel Street's role in supplying the US' Customs and Border Protection (CBP) and Immigration and Customs Enforcement (ICE) with products that have enabled the monitoring of migrants, including student activists, and powered disproportionate and human rights violating immigration enforcement in the United States. Of particular concern is the current US administration's "Catch and Revoke" system,³ which combines social media monitoring, visa status tracking, and automated threat assessment, potentially leading to arbitrary deportations and violations of privacy rights. Among the at least 80 ongoing AI projects house at ICE and CBP as of this time, the surveillance and analytics products supplied by Babel Street's Babel X match the capabilities described under the 'Catch and Revoke' system.

I am writing today to notify you that on the basis of the review of documentation noted above, Amnesty International will be publishing research on key human rights risks pertaining to Babel Street's links to the monitoring of activists and immigration enforcement in the USA and to seek your responses in relation to the conclusions of this research. We are making you aware of this research to provide you with an opportunity to respond and provide further information prior to publication, and to ensure that your response is appropriately reflected in the final publication.

In addition to commenting on the conclusions below, please do provide any information on how Babel Street has fulfilled its human rights responsibilities on this matter, including any and all human rights due diligence efforts.

Our conclusions in relation to Babel Street are detailed below:

THE USE OF BABEL STREET PRODUCTS IN CATCH & REVOKE

Recent developments in US surveillance systems present significant human rights concerns, particularly in the context of heightened monitoring of student activists, including Palestinian solidarity protestors, and immigration enforcement. The integration and centralization of previously disparate surveillance tools, coupled with new executive orders and aggressive border and immigration enforcement policies, has created an unprecedented system of monitoring and control. Of particular concern is the "Catch and Revoke" system,⁴ which combines social media monitoring, visa status tracking, and automated threat assessment, potentially leading to arbitrary deportations and violations of privacy rights.⁵

As of 9th April, the U.S. Citizenship and Immigration Services (USCIS) has publicly acknowledged to: 'consider social media content that indicates an alien endorsing, espousing, promoting, or supporting antisemitic terrorism, antisemitic terrorist organizations, or other antisemitic activity as a negative factor in any USCIS **discretionary analysis** when adjudicating immigration benefit requests. This guidance is effective immediately.'⁶

Review of documentation by Amnesty International has found that Babel Street's Babel X possesses automated open-source intelligence (OSINT) capabilities that enable constant monitoring, surveillance, and assessments.

² UNGPs, Principle 11 including Commentary.

³ United States Department of State, '100 Days of an America First State Department', April 2025, <https://www.state.gov/releases/2025/04/100-days-of-an-america-first-state-department/>

⁴ United States Department of State, '100 Days of an America First State Department', April 2025, <https://www.state.gov/releases/2025/04/100-days-of-an-america-first-state-department/>

⁵ United States Department of State, '100 Days of an America First State Department', April 2025, <https://www.state.gov/releases/2025/04/100-days-of-an-america-first-state-department/>

⁶ US Citizenship and Immigration Services (USCIS), 'DHS to Begin Screening Aliens' Social Media Activity for Antisemitism', 9 April 2025, <https://www.uscis.gov/newsroom/news-releases/dhs-to-begin-screening-aliens-social-media-activity-for-antisemitism>

These include real-time monitoring of social media posts across multiple platforms, pattern recognition and sentiment analysis, data aggregation from various public and private sources, multiple government databases, and automated risk assessment. These capabilities match those described in the Catch and Revoke system.

The application of AI surveillance tools in the current context risks contributing to intimidation efforts by the US authorities against migrants, with heightened risks to peaceful student protestors across campuses for showcasing solidarity against an ongoing genocide in Gaza. The human rights risks of your technologies being used in this context are of grave concern. These systems risk contributing to human rights violations, namely the rights to privacy, freedom of expression and access to information, freedom of movement equality and non-discrimination, and the right to liberty and protest.

The Catch and Revoke system draws upon products that the US Department of Homeland Security holds private contracts for; the department acknowledges that it currently hosts at least 80 AI projects on their own website.⁷

Amnesty International has found that Babel is listed under the US Department of Homeland Security's (DHS) active AI projects page as "a commercially procured tool that helps CBP compile social media and open-source information on travelers who may be subject to further screening for potential violation of laws that CBP is authorized to enforce or administer." Our review of documentation from DHS' public records, and previously disclosed procurement and privacy assessment documents, has shown that the product in question is named **Babel X**,⁸ which has been known to have been in use by the US government since 2023.⁹ We have learned that the technology is capable of gathering extensive data from a single identifier (name, email, or phone number); accessing social media posts, IP addresses, employment history, and mobile phone advertising identifiers; monitoring various groups including U.S. citizens, permanent residents, refugees, and asylum seekers.

Amnesty International has learned that Babel Street AI products use 'persistent search' to continue monitoring any new information appearing online, or in other governmental databases, on individuals in question, even after an initial search query has been done.¹⁰

In February 2025, Senior Vice President and General Manager of Identity Risk and Border Programs at Babel Street, Mohamad El-Hamalawy posted an article promoting the use of AI-enabled OSINT to counter and find terrorist related content for interception and border security,¹¹ and to find "radicalized groups and individuals" using keyword searches across large databases of both documents, news articles, and online media.

Already in 2022, the Electronic Privacy Information Center (EPIC) exposed Babel Street's work with CBP and ICE on location tracking,¹² in which they uncovered how unique IDs generated for mobile app advertising, together with social media data, were used to track device locations and share these with government agencies.

⁷ US Department of Homeland Security, 'United States Customs and Border Protection – AI Use Cases', <https://www.dhs.gov/ai/use-case-inventory/cbp>

⁸ Electronic Privacy Information Center, First Interim CBP Production under 'EPIC FOIA: CBP (Babel Street Location-Tracking Service)', 16 May 2022, <https://epic.org/documents/epic-foia-cbp-babel-street-location-tracking-service/>

⁹ Mijente, 'Automating Deportation, 2024, <https://mijente.net/wp-content/uploads/2024/06/Automating-Deportation.pdf>

¹⁰ Babel Street, 'The Honest Guide to AI for Border Security', 2024, <https://babel-street.files.svdcn.com/production/PDF/Babel-Street-Honest-Guide-to-AI-for-Border-Security.pdf?dm=1715977175>

¹¹ The Journal of Border Security and Transnational Crime, 'Harnessing OSINT to Counter Terrorism and Radicalization', February 2025, <https://www.babelstreet.com/about-us/newsroom/harnessing-osint-to-counter-terrorism-and-radicalization>

¹² Electronic Privacy Information Center, First Interim CBP Production under 'EPIC FOIA: CBP (Babel Street Location-Tracking Service)', 16 May 2022, <https://epic.org/documents/epic-foia-cbp-babel-street-location-tracking-service/>

In CBP's own Privacy Threshold Analysis (PTA) of Babel X, released as part of court order won by Electronic Privacy Information Center (EPIC) to disclose documents, CBP describes the system as such:

'[Babel X] can handle requests across more than 52+ social media platforms and millions of URLs and deep/dark web data. Babel X can perform cross-lingual searches across more than 200 languages, allowing users to enter terms in English and return foreign language results. The platform also has the ability to build sophisticated filtering options for catered feeds and render various data visualizations. Lastly, Babel X allows for networks discovery with social media link analysis and provides user anonymity in viewing collected results.'¹³

The PTA further confirms that personally identifiable information is processed by the system of both persons with and without US citizenship, and targets predominantly 'Refugees/Asylees', which is ticked off in the PTA as 'sensitive/protected population.' In other words, individuals with the most precarious status are at greater risk of being subjected to Babel's systems, jeopardising their right to privacy, as well as to equality and non-discrimination.

The use of AI-enabled tools like Babel Street's Babel X, combined with abusive and discriminatory administrative powers in visa revocation,¹⁴ warrantless raids, detention, and deportations, is of high risk of creating a chilling effect on human rights, particularly affecting individuals in vulnerable situations. The fact that the system is couched in a political context that asymmetrically targets specific ethnic and religious groups, and has seen further degradation since the start of 2025—in particular through the execution of the Catch and Revoke initiative—furthermore, raises serious concerns about discrimination and profiling.

The overarching context of repression,¹⁵ and discriminatory surveillance and immigration enforcement practices,¹⁶ in particular against international students,¹⁷ demonstrates the clear risk of contributions to human rights violations posed to any actor or technology that aids the administration in these endeavours.

The use of Babel X within the Catch & Revoke framework risks contributing to serious human rights violations through contributing to the creation of an unprecedented surveillance apparatus that enables mass monitoring and automated decision-making affecting individuals' human rights.

FAILURE TO PROACTIVELY PREVENT OR ADEQUATELY MITIGATE ABUSES OF THE HUMAN RIGHTS OF TARGETED MIGRANT COMMUNITIES

While Amnesty International could not find any information on the company's human rights policy and procedures, the company's website states that it is "dedicated to ensuring our AI does not exploit or discriminate against any

¹³ Electronic Privacy Information Center, First Interim CBP Production under 'EPIC FOIA: CBP (Babel Street Location-Tracking Service)', 16 May 2022, <https://epic.org/documents/epic-foia-cbp-babel-street-location-tracking-service/>

¹⁴ Amnesty International, 'Stop revoking visas of foreign students', 21 April 2025, <https://www.amnesty.org/en/documents/amr51/9290/2025/en/>

¹⁵ Amnesty International, 'People seeking safety at risk in the USA', 21 January 2025, <https://www.amnesty.org/en/documents/amr51/8933/2025/en/>; Amnesty International, 'Unlawful Expulsions to El Salvador Endanger Lives Amid Ongoing State of Emergency', 25 March 2025, <https://www.amnesty.org/en/latest/news/2025/03/unlawful-expulsions-to-el-salvador-endanger-lives-amid-ongoing-state-of-emergency/>

¹⁶ Amnesty International, 'Urgent Action: Stop Revoking Visas of Foreign Students', 22 April 2025, <https://www.amnesty.org/en/wp-content/uploads/2025/04/AMR5192902025ENGLISH.pdf>

¹⁷ Amnesty International USA, 'Amnesty International USA and ACLU Work with College and University Students to Help Protect their Campuses from President Trump's Attack on Human Rights', 16 April 2025, <https://www.amnestyusa.org/press-releases/amnesty-international-usa-and-aclu-work-with-college-and-university-students-to-help-protect-their-campuses-from-president-trumps-attack-on-human-rights/>

group."¹⁸ It also refers to its ethical principles and standards as: "We take also responsibility for how our technology is used. Babel Street develops AI in a manner that prioritizes safety and avoids harm to individuals, communities, or the broader world. Some of our AI systems are used to support national security, defense, and public safety missions. We work closely with our customers to ensure our solutions are applied responsibly and align with intended use." Given the findings outlined above, it would be helpful if Babel Street could provide information on how the company has followed these commitments in the context described in this letter, and whether it has contractual safeguards that allow it to withdraw its product from use if there are concerns of these standards not being followed.

To date, Amnesty International has found no evidence of adequate human rights due diligence by Babel. As the data controller involved in processing information on behalf of clients,¹⁹ in this case, immigration enforcement agencies, Babel Street has a responsibility to carry out adequate human rights due diligence to ensure that its products are not linked or contribute to human rights abuses. In contexts where the risk of human rights abuse is high, such as the current immigration context in the United States, companies are required to carry out heightened and ongoing due diligence. Knowledge of possible human rights harms and failure to take action suggests a failure by the company to fulfill its human rights responsibilities. Given the documentation reviewed, Amnesty International concludes that Babel Street could and should have known about the possible human rights violations committed by ICE and could and should have refrained from entering a further contractual relationship for Babel X. Amnesty International's research indicates that Babel Street's products may have played a role in serious human rights violations, including violations of:

- **The right to privacy:** Through extensive data collection and processing without knowledge and consent, including persistent searches, Babel Street products could be used to subject individuals residing in the US to routine violations of their rights to privacy, by treating them as suspicious by default, without suspicion or documentation of criminal wrongdoing. By extending the dragnet of surveillance and residency consequences on the basis of political speech—and specifically, speech that is calling for the rights of another population to be observed under international law—Babel Street is empowering the current administration in its illegitimate, disproportionate, and unnecessary abuses of this technology.
- **The right to freedom of expression and peaceful assembly:** Through mass surveillance and potential targeting of political speech, Babel Street products can be used to target people directly for arrest and deportation, on the basis of their protected expression. Students, and any resident in the USA, could be subjected to unwarranted flagging, identification, detention and deportation, on the basis of expression and protest, as has been documented extensively over the last 6 months. Babel Street products can furthermore be used to impart a chilling effect on individuals, and in particular students, engaged in their constitutional and international human right to protest.
- **Right to equality and non-discrimination:** Babel Street's continued support, and its provision of automated capabilities to the US government's discriminatory and arbitrary immigration policies, risks contributing to ongoing human rights violations. The current administration's repressive tactics and summary revocation of people's immigration status demonstrate a lack of respect for human rights to freedom of expression and peaceful assembly. It represents an overt violation of the right to equality and non-discrimination, with visa-holders, and asylees explicitly targeted by the AI-driven systems. Through the use of predictive analytics, these systems may label individuals as threats based on probabilistic inferences and over-broad

¹⁸ <https://www.babelstreet.com/about-us>

¹⁹ <https://www.babelstreet.com/legal/dpa.pdf>

categories related to their online and offline speech, e.g. conflating Palestine solidarity speech with antisemitism or national security risks, which can result in or further exacerbate discriminatory outcomes.

CONCLUSION

Amnesty International considers that Babel Street has failed to conduct adequate human rights due diligence, by not taking appropriate measures to prevent and mitigate their products being used by the US Administration in the context of systematically imparting human rights violations on migrant communities within the United States, including international students. In doing so, Babel Street are risking contributing to serious human rights violations, the risks of which it should and could have known about. Babel Street must immediately cease their work with the US administration related to immigration enforcement, and they must conduct and publish the full findings of human rights due diligence processes

Amnesty International intends to publish a public statement about our concerns and may include part or all of your response in the statement. To enable us to consider incorporating this into our public statement, please respond by email to [REDACTED] copied in, by the close of business on 24 July 2025.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Amnesty Tech,
Amnesty International