



TRIBUNAL SUPERIOR ELEITORAL

REPRESENTAÇÃO (11541) Nº 0602260-84.2026.6.00.0000 (PJe) - BRASÍLIA - DISTRITO FEDERAL

RELATOR: MINISTRO ANDRÉ MENDONÇA
REPRESENTANTE: FLAVIO NANTES BOLSONARO

Representantes do(a) REPRESENTANTE: TIAGO SANTOS SILVA - RJ155213, RENATA ANTONY DE SOUZA LIMA NINA - DF23600, PAULO HENRIQUE GOLAMBIUK - PR62051-A, LUCAS DE PADUA CARVALHO MENDES LIMA - DF87357, JOSE VICENTE SANTINI - DF36184, DRICIA VITORIA CORADO SOUZA LIMA - DF69367, BELIZE OBES DE MELO DE ANDRADE - DF42507, ANA MARCIA DOS SANTOS MELLO - MG58065-A, ANA LETICIA CARVALHO DOS SANTOS - DF52903, MARIA CLAUDIA BUCCHIANERI - DF25341
REPRESENTADO: ANTONIO PEDRO OSORIO TABET

DECISÃO

Após a prolação da decisão que deferiu parcialmente a tutela de urgência, o representante peticionou nos autos requerendo a adoção de medidas adicionais destinadas a impedir a disseminação, em diferentes plataformas digitais, da narrativa segundo a qual pretenderia retirar de Nossa Senhora Aparecida o título de Padroeira do Brasil.

Na primeira petição superveniente, apresentada no início da manhã de 25.9.2026, sustentou que levantamento técnico então disponível havia identificado 2.086 publicações, provenientes de 1.674 contas distintas, com mais de 21 milhões de visualizações, além de aproximadamente 1,49 milhão de curtidas e 312 mil compartilhamentos, e requereu a cientificação e a atuação preventiva dos demais provedores de aplicação.

Posteriormente, a parte apresentou nova petição e relatório complementar, com recorte atualizado até as 15h de 25.9.2026, afirmando que a disseminação teria continuado a se ampliar mesmo após a primeira manifestação superveniente e juntando extensa relação de novos endereços eletrônicos em que o mesmo núcleo factual estaria sendo reproduzido.



Sustenta, assim, que a tutela limitada à remoção individual de URLs teria se revelado insuficiente diante da velocidade e da escala de reprodução do conteúdo, e requer a expedição de ofícios às plataformas Meta, X, TikTok e YouTube para adoção de medidas voltadas à indisponibilização imediata de conteúdos idênticos ou substancialmente equivalentes, à contenção de novas replicações e à preservação de registros relacionados à circulação da narrativa.

É o relatório. Decido.

Os elementos supervenientes apresentados justificam a complementação da tutela anteriormente deferida.

Na decisão já proferida, reconheceu-se, em juízo de cognição sumária, a ausência de suporte fático mínimo para a narrativa segundo a qual o representante ou sua família teriam promovido ou articulado ataque a Nossa Senhora Aparecida, especialmente mediante iniciativa destinada a retirar-lhe o título de Padroeira do Brasil.

O quadro agora apresentado demonstra que a controvérsia ultrapassou a publicação individual inicialmente impugnada e passou a apresentar características próprias de replicação massiva e multiplataforma.

Esse dado é juridicamente relevante porque a disciplina eleitoral atualmente vigente contém mecanismo específico voltado precisamente à hipótese de reprodução sucessiva de conteúdo já submetido a ordem de indisponibilização.

Nos termos do art. 9º-E, VI, da Res.-TSE nº 23.610/2019, com a redação conferida pela Res.-TSE nº 23.755/2026, os provedores de aplicação respondem quando, cientes da decisão, deixam de promover a indisponibilização imediata de publicações que reproduzam, no todo ou em parte, conteúdo idêntico ou substancialmente equivalente àquele já objeto de ordem de indisponibilização pela Justiça Eleitoral, independentemente de nova ordem judicial específica.

O § 1º do mesmo dispositivo estabelece: “O Juízo competente poderá, de ofício ou a requerimento do autor da representação, determinar a cientificação dos demais provedores de aplicação para que atuem preventivamente contra a disseminação dos conteúdos referidos no inciso VI deste artigo”.

A norma parte da constatação de que a efetividade da tutela eleitoral não pode depender da expedição de uma nova ordem judicial para cada reprodução materialmente equivalente do mesmo conteúdo.

A hipótese dos autos evidencia precisamente essa dificuldade.

Segundo os dados apresentados, a narrativa se disseminou por milhares de publicações em diferentes plataformas, mesmo após desmentido público e correção da informação. A primeira petição superveniente já apontava 1.301 novas publicações em período posterior à correção. O relatório complementar, com recorte posterior, acrescenta novos endereços



eletrônicos e evidencia que a simples retirada pontual de publicações não se mostra suficiente para interromper o ciclo de replicação.

A preocupação com a reprodução sucessiva de conteúdo desinformativo em momento crítico do processo eleitoral não é nova na jurisprudência desta Corte.

Nas Eleições de 2022, no Referendo na Rp nº 0601412-39.2022.6.00.0000, esta Corte examinou publicações que atribuíam falsamente a candidato à Presidência da República manifestações relacionadas ao fim do cristianismo e à afirmação de que venceria as eleições “com a ajuda do pai Xangô”. Conforme registrado nos autos, naquela hipótese não apenas foi determinada a remoção das publicações impugnadas, mas também se previu sanção para a reiteração de postagens com conteúdo idêntico.

A orientação adotada naquele caso revela preocupação não apenas com a publicação originária, mas também com a reiteração do núcleo desinformativo, especialmente quando sua reprodução sucessiva é capaz de esvaziar a utilidade prática da tutela jurisdicional.

A jurisprudência do Tribunal também passou a reconhecer, a partir das Eleições de 2022, a possibilidade de aplicação da multa prevista no art. 57-D, § 2º, da Lei nº 9.504/1997 em hipóteses de disseminação de conteúdo sabidamente falso na internet, considerando, entre outros critérios, reiteração, alcance da publicação e proximidade do pleito.

A evolução normativa promovida pela Res.-TSE nº 23.755/2026 tornou ainda mais explícita essa possibilidade ao prever, no art. 9º-E, VI, que reproduções idênticas ou substancialmente equivalentes podem ser alcançadas sem nova decisão judicial específica, uma vez cientificado o provedor.

Há, ademais, orientação convergente do Supremo Tribunal Federal.

No julgamento do Tema 987 da repercussão geral, o STF assentou que, em se tratando de sucessivas replicações de fato ofensivo já reconhecido por decisão judicial, os provedores de redes sociais deverão remover publicações com conteúdos idênticos, independentemente de novas decisões judiciais, a partir de notificação judicial ou extrajudicial.

A disciplina eleitoral atualmente vigente possui alcance ainda mais específico para o processo eleitoral, pois o art. 9º-E, VI, não se restringe às cópias rigorosamente idênticas, abrangendo também conteúdos substancialmente equivalentes, desde que reproduzam, no todo ou em parte, o conteúdo já atingido pela decisão judicial.

Esse mecanismo deve, contudo, ser aplicado de forma suficientemente delimitada, a fim de preservar a liberdade de expressão política, a crítica, a sátira, a opinião e a divulgação jornalística do próprio episódio.

Não se mostra adequado estabelecer proibição genérica sobre qualquer referência a Nossa Senhora Aparecida, ao debate religioso ou mesmo à controvérsia atualmente existente.



O núcleo desinformativo cuja circulação se pretende impedir deve ser objetivamente identificado.

Para os fins desta decisão, considera-se conteúdo abrangido pela ordem e, portanto, vedado, por ser notoriamente inverídico, aquele que apresente como fato a afirmação de que Flavio Nantes Bolsonaro ou sua família propôs, articulou, apoiou, está comprometido com ou pretende promover a retirada de Nossa Senhora Aparecida da condição ou do título de Padroeira do Brasil.

Consideram-se substancialmente equivalentes as publicações que, embora empreguem redação, imagem, áudio, vídeo, meme ou formato diverso, transmitam esse mesmo núcleo factual.

Não se incluem na determinação reproduções destinadas a desmentir a informação, manifestações críticas ou opinativas que não apresentem como verdadeiro o núcleo factual acima delimitado, nem debates gerais sobre religião e política.

Essa delimitação é especialmente importante porque a atuação preventiva prevista no art. 9º-E, § 1º, da Res.-TSE nº 23.610/2019 não pode converter-se em delegação genérica às plataformas para suprimir manifestações politicamente desfavoráveis ao candidato.

Quanto às providências técnicas requeridas, entendo igualmente necessária alguma calibragem.

A utilização de ferramentas de correspondência destinadas à identificação de cópias exatas do card especificamente indicado nos autos, inclusive por identificação criptográfica ou mecanismo técnico equivalente, apresenta grau elevado de objetividade e se mostra compatível com a finalidade da tutela.

De outro lado, não cabe ao Poder Judiciário, em princípio, substituir-se aos provedores na definição pormenorizada dos mecanismos internos de recomendação, ranqueamento ou distribuição algorítmica.

Mostra-se mais adequado determinar que as plataformas adotem, no âmbito de suas capacidades técnicas e nos termos do art. 9º-D da Res.-TSE nº 23.610/2019, medidas eficazes e proporcionais para impedir ou diminuir a circulação do conteúdo aqui delimitado, incluindo a indisponibilização imediata das publicações abrangidas por esta decisão, sem prejuízo de outras soluções técnicas compatíveis com sua arquitetura e seus serviços.

A proximidade do primeiro turno também recomenda que a prestação de informações sobre o cumprimento ocorra em prazo reduzido.

Por fim, a adoção de medidas coercitivas dirigidas tanto aos responsáveis pelas publicações quanto aos provedores de aplicação encontra respaldo na experiência jurisprudencial desta Corte e no poder geral de efetivação da tutela jurisdicional.



Nas Eleições de 2022, o TSE adotou reiteradamente sistemática que combinava ordem de remoção de conteúdo desinformativo, comunicação direta a diferentes plataformas, dever de informar as providências adotadas e cominação de multa para assegurar o cumprimento.

Como já apontado, na Rp nº 0601412-39.2022.6.00.0000, Rel. Min. Maria Claudia Bucchianeri, que envolvia montagem fraudulenta atribuída a Luiz Inácio Lula da Silva relacionada ao cristianismo e a religiões de matriz africana, determinou-se a imediata remoção de publicações veiculadas no Facebook e no TikTok, com multa diária de R\$ 10.000,00 em caso de reiteração de postagens com conteúdo idêntico. Além disso, os provedores foram expressamente oficiados para cumprimento da ordem de remoção no prazo de 24 horas, sob pena de multa de R\$ 50.000,00.

Também na Ref-Rp nº 0600846-90.2022.6.00.0000, Rel. Min. Paulo de Tarso Sanseverino, o Plenário referendou, por unanimidade, tutela que reconheceu como manifestamente falsas publicações difundidas em diferentes formatos sobre suposta fraude no QR Code do título eleitoral e determinou a remoção do material, com oficiamento simultâneo dos provedores Twitter, Facebook e Gettr, nos termos do art. 17, § 1º-B, da Res.-TSE nº 23.608/2019.

Os precedentes revelam, portanto, que a atuação desta Corte em matéria de desinformação eleitoral não se limita à emissão de ordens dirigidas aos autores das publicações. Em situações de circulação multiplataforma e risco de rápida propagação, o TSE já recorreu ao oficiamento concomitante dos provedores, à imposição de deveres de remoção e de prestação de informações e à previsão de medidas pecuniárias coercitivas, de modo a conferir efetividade prática à tutela jurisdicional.

A disciplina introduzida pelo art. 9º-E, VI e § 1º, da Res.-TSE nº 23.610/2019, na redação vigente para as Eleições de 2026, torna ainda mais explícita essa possibilidade ao autorizar a cientificação preventiva dos demais provedores diante de reproduções idênticas ou substancialmente equivalentes de conteúdo já objeto de ordem de indisponibilização.

Ante o exposto, em complementação à decisão anteriormente proferida, defiro **parcialmente os pedidos formulados na petição superveniente** para:

a) reconhecer, para os fins desta tutela provisória, como notoriamente inverídico o núcleo factual segundo o qual Flavio Nantes Bolsonaro ou sua família propôs, articulou, apoiou, está comprometido com ou pretende promover a retirada de Nossa Senhora Aparecida da condição ou do título de Padroeira do Brasil;

b) determinar a cientificação, pelo meio mais expedito, da X Brasil Internet Ltda., da Facebook Serviços Online do Brasil Ltda., relativamente às plataformas Facebook e Instagram, da ByteDance Brasil Tecnologia Ltda., relativamente ao TikTok, e da Google Brasil Internet Ltda., relativamente ao YouTube, nos termos do art. 9º-E, § 1º, da Res.-TSE nº 23.610/2019, para que atuem preventivamente contra a disseminação dos conteúdos abrangidos por esta decisão;



c) determinar aos provedores acima referidos que promovam a indisponibilização imediata das publicações relacionadas nos anexos e na petição superveniente, abaixo individualizadas, desde que reproduzam o núcleo factual delimitado nesta decisão:

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<https://x.com/AdodaCosta5480/status/2103544514728341675>

<https://x.com/vladpc/status/2103544639810576406>

<https://x.com/Vascoracao/status/2103544703413060056>

https://x.com/sempre_manda/status/2103544991293251717;

d) determinar aos provedores que, uma vez cientes desta decisão, promovam a indisponibilização imediata, independentemente de nova ordem judicial específica, das publicações que reproduzam, no todo ou em parte, de forma idêntica ou substancialmente equivalente, o núcleo factual descrito no item “a”, nos termos do art. 9º-E, VI, da Res.-TSE nº 23.610/2019;

e) determinar aos provedores que, mediante suas ferramentas técnicas de correspondência de imagem ou tecnologia equivalente, identifiquem e tornem indisponíveis as cópias idênticas do card denominado na petição “Para agradar evangélicos, Flávio Bolsonaro articula retirada de Nossa Senhora Aparecida como Padroeira do Brasil”, correspondente ao identificador criptográfico informado nos autos, desde que verificada a correspondência entre o arquivo e o conteúdo alcançado por esta decisão;

f) determinar que os provedores adotem, nos termos do art. 9º-D da Res.-TSE nº 23.610/2019 e no âmbito de suas capacidades técnicas, medidas eficazes e proporcionais destinadas a impedir ou diminuir a circulação dos conteúdos abrangidos pela presente ordem, inclusive mediante a indisponibilização imediata das publicações correspondentes, preservadas as manifestações que não apresentem como verdadeiro o núcleo factual acima delimitado;

g) determinar a preservação, pelo prazo legalmente aplicável, dos registros eletrônicos relacionados às publicações especificamente alcançadas pela presente decisão, inclusive dados de alcance, compartilhamento e eventual impulsionamento, observadas as limitações legais relativas à guarda e ao fornecimento de dados pessoais;

h) determinar que os provedores informem a este Tribunal, no prazo de 48 horas, as providências adotadas em cumprimento à presente decisão e, na medida de suas capacidades técnicas, o número de conteúdos indisponibilizados;

i) esclarecer que as sucessivas replicações de conteúdo idêntico poderão igualmente ser objeto de notificação direta aos provedores, sem necessidade de nova decisão judicial específica, observados os limites fixados nesta decisão e a orientação firmada pelo Supremo Tribunal Federal no Tema 987 da repercussão geral;

j) fixar multa de R\$ 50.000,00 (cinquenta mil reais) por dia de descumprimento, por provedor, sem prejuízo da adoção de outras medidas coercitivas que se revelem necessárias, consideradas a proximidade do pleito, a escala de disseminação noticiada e a necessidade de assegurar efetividade à tutela jurisdicional.



Fica expressamente ressalvado que a presente decisão não alcança conteúdo jornalístico sobre o episódio, manifestações destinadas a desmentir a informação, críticas, sátiras, opiniões políticas ou debates gerais sobre religião e política que não apresentem como verdadeiro o núcleo factual delimitado nesta decisão.

Junte-se.

Dê-se ciência à Procuradoria-Geral Eleitoral.

Submeta-se a presente decisão complementar ao Plenário, inclusive por intermédio de sessão virtual, nos exatos termos do art. 2º da Portaria TSE nº 235/2026.

Publique-se em mural. Intimem-se. **Cumpra-se com urgência.**

Brasília, data registrada no sistema.

Ministro **ANDRÉ MENDONÇA**
Relator

