

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

STATE OF MISSOURI *ex rel.* ERIC S.
SCHMITT, Attorney General,

STATE OF LOUISIANA *ex rel.* JEFFREY
M. LANDRY, Attorney General, *et al.*,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official
capacity as President of the United States, *et
al.*,

Defendants.

Case No. 3:22-cv-01213

THE PARTIES' JOINT STATEMENT ON DISCOVERY DISPUTES

Pursuant to the Court's Order, Doc. 34, at 14, the parties respectfully submit this Joint Statement regarding discovery disputes.

PLAINTIFFS' POSITION

On July 19, 2022, pursuant to the Court's Order, the Plaintiffs served interrogatories and document requests upon the Government Defendants seeking the identity of federal officials who have been and are communicating with social-media platforms about disinformation, misinformation, malinformation, and/or any censorship or suppression of speech on social media, including the nature and content of those communications. Doc. 34, at 13. Plaintiffs also served third-party subpoenas on five major social-media platforms – Twitter, Facebook and Instagram (both owned by Meta), YouTube, and LinkedIn. *See* Doc. 34, at 13. On August 17, 2022, the Government Defendants provided objections and responses to the Plaintiff States' discovery requests, and began a rolling production of documents that was completed on August 26, 2022.

The parties met and conferred on multiple occasions in attempt to resolve their disputes. These efforts resulted in a significant narrowing of the disputes, but disputes remain unresolved as to the following issues:

1. Whether the White House Defendants – the White House Press Secretary and Dr. Fauci in his capacity as Chief Medical Advisor to the President – should be compelled to respond to Plaintiffs’ interrogatories and document requests.

2. Whether Defendants should be required, in response to Plaintiffs’ interrogatories, to identify federal officials and agencies whom they know of *outside their own agencies* who have or are engaged in communications with social-media platforms about misinformation, disinformation, malinformation, and/or censorship or suppression of speech on social-media, and produce any such communications in their possession.

3. Whether Defendant Health and Human Services (HHS) and Dr. Fauci in his capacity as NIAID Director should be required to provide complete responses to Plaintiffs’ interrogatories and document requests.¹

4. Whether Plaintiffs should be allowed leave of Court to file a Second Amended Complaint adding as Defendants newly identified federal officials and agencies, whose identities have been revealed during the discovery process, and obtain similar expedited discovery against them.

5. Whether Defendants should be permitted to seek reciprocal discovery against Plaintiffs.

The Parties have set forth their respective positions on these disputes below. Plaintiffs’ position is presented first, then Defendants’ position.

¹ The parties are still engaged in active discussions of issues 2 and 3 listed here in effort to reach agreement. If they do reach agreement on these issues, they will promptly notify the Court that those issues are resolved.

Under the First Amendment, the federal Government should have no role in policing private speech or picking winners and losers in the marketplace of ideas. But that is what federal officials are doing, on a massive scale – a scale whose full scope and impact is yet to be determined.

Secretary Mayorkas of DHS commented that the federal Government’s efforts to police private speech on social media are occurring “across the federal enterprise.” Doc. 45, ¶ 233. It turns out that this statement is true, on a scale beyond what Plaintiffs could ever have anticipated. The limited discovery produced so far provides a tantalizing snapshot into a massive, sprawling federal “Censorship Enterprise,” which includes dozens of federal officials across at least eleven federal agencies and components identified so far, who communicate with social-media platforms about misinformation, disinformation, and the suppression of private speech on social media—all with the intent and effect of pressuring social-media platforms to censor and suppress private speech that federal officials disfavor. The discovery provided so far demonstrates that this Censorship Enterprise is extremely broad, including officials in the White House, HHS, DHS, CISA, the CDC, NIAID, and the Office of the Surgeon General; and evidently other agencies as well, such as the Census Bureau, the FDA, the FBI, the State Department, the Treasury Department, and the U.S. Election Assistance Commission. And it rises to the highest levels of the U.S. Government, including numerous White House officials. More discovery is needed to uncover the full scope of this “Censorship Enterprise,” and thus allow Plaintiffs the opportunity to achieve fully effective injunctive relief. Defendants have objected to producing some of the most relevant and probative information in their possession—*i.e.*, the identities, and nature and content of communications, of White House officials and officials at other federal agencies who are not yet Defendants in this case because they were unknown when Plaintiffs served their discovery six weeks ago. Defendants have objected to producing discovery that would reveal both the height

and the breadth of the federal “Censorship Enterprise.” The Court should overrule these objections and order Defendants to provide this highly relevant, responsive, and probative information.

I. Status of Discovery To Date.

This Court’s order granting expedited preliminary-injunction-related discovery authorized Plaintiffs to “serve interrogatories and document requests upon Government Defendants and third party-subpoenas on up to five major social-media platforms seeking the identity of federal officials who have been and are communicating with social-media platforms about disinformation, misinformation, malinformation, and/or any censorship or suppression of speech on social media, including the nature and content of those communications.” Doc. 34, at 13. Pursuant to this Order, on July 18, 2022, Plaintiffs served ten sets of Interrogatories and eight sets of Requests for Production on the Government Defendants, including all Defendants except President Biden. These discovery requests sought the identities of federal officials who are or have engaged in communications with social-media platforms about the topics identified in the Court’s Order, as well as the nature and content of those communications. At the same time, Plaintiffs served third-party subpoenas on Twitter, Facebook, Instagram,² YouTube, and LinkedIn, seeking similar information. *See id.*

Defendants served their objections and responses on August 17, 2022, and they began a rolling production of documents that lasted until August 26, 2022. During the same time, Plaintiffs and Defendants engaged in extensive discussions in attempt to resolve disputed issues, which resulted in the production (or anticipated production) of additional information. Plaintiffs also engaged in extensive discussions with the social-media platforms that received third-party

² Facebook and Instagram are both owned by Meta, so those two were treated as a combined subpoena.

subpoenas, and Plaintiffs obtained responses of relevant information from those social-media platforms. The discovery provided so far includes significant information that provides a snapshot into the extent of the federal Defendants' social-media censorship activities, and that support and reinforce the allegations in the First Amended Complaint. It also illustrates the nature and importance of the parties' remaining disputes.

First, the breadth and extent of the federal Defendants' censorship activities is massive. In their initial response to interrogatories, Defendants initially identified *forty-five* federal officials at DHS, CISA, the CDC, NIAID, and the Office of the Surgeon General (all within only two federal agencies, DHS and HHS), who communicate with social-media platforms about misinformation and censorship. Ex. 1 (Defendants' Redacted Interrogatory Responses), at 15-18. But in those responses, Defendants did not provide information about any federal officials at *other* federal agencies of whom they are aware who engage in such communications with social-media platforms about misinformation and censorship, though Plaintiffs had specifically asked for this highly relevant information. *See id.* Defendants' document production, however, reveals that such officials at other federal agencies exist—for example, their emails include extensive copying of officials at the Census Bureau, and they also include communications involving the Departments of Treasury and State. *See* Ex. 2. The third-party social-media platforms, moreover, have revealed that more federal agencies are involved. Meta, for example, has disclosed that at least 32 federal officials—including senior officials at the FDA, the U.S. Election Assistance Commission, and the White House—have communicated with Meta about content moderation on its platforms, many of whom were not disclosed in response to Plaintiffs' interrogatories to Defendants. YouTube disclosed eleven federal officials engaged in such communications, including officials at the Census Bureau and the White House, many of whom were also not disclosed by Defendants.

Twitter disclosed nine federal officials, including senior officials at the State Department who were not previously disclosed by Defendants.

Second, these federal censorship activities include very senior officials within the U.S. Government, *i.e.*, “members of our senior staff,” in Jen Psaki’s words. Doc. 42, ¶ 174. Defendants have steadfastly refused to respond to any interrogatories or document requests directed to the White House officials, such as White House Press Secretary Karine Jean-Pierre and Dr. Fauci in his capacity as Chief Medical Advisor to the President. But their own document production provides a glimpse into the involvement of several senior White House officials in communications with social-media platforms about censorship – including White House Senior Covid-19 Advisor Andrew Slavitt, Deputy Assistant to the President Rob Flaherty, White House Covid-19 Director of Strategic Communications and Engagement Courtney Rowe, White House Digital Director for the Covid-19 Response Team Clarke Humphrey, among others. *See* Ex. 3. Further, the social-media platforms have independently disclosed the identities of senior White House officials involved in such communications. For example, Meta has disclosed the involvement of additional White House officials as White House Counsel Dana Remus and White House Partnerships Manager Aisha Shah, as well as Deputy Assistant to the President Rob Flaherty. YouTube has disclosed the involvement of White House officials such as Rob Flaherty and Benjamin Wakana, the Director of Strategic Communications and Engagement at the White House COVID-19 Response Team. Twitter has disclosed the involvement of Andrew Slavitt.

The limited communications produced so far from these high-level officials are particularly relevant and probative, because they provide revealing glimpses into the intensive oversight and pressure to censor that senior federal officials placed on social-media platforms. For example, after President Biden publicly stated (about Facebook) on July 16, 2021, that “They’re killing

people,” a very senior executive at Meta (Facebook and Instagram) reached out to Surgeon General Murthy to engage in damage control and appease the President’s wrath. Ex. 4, at 1. Soon thereafter, the same Meta executive sent a text message to Surgeon General Murthy, noting that “it’s not great to be accused of killing people,” and expressing that he was “keen to find a way to deescalate and work together collaboratively.” Ex. 5, at 1. Such “deescalation” and “working together collaboratively,” naturally, involved increasing censorship on Meta’s platforms. One week after President Biden’s public accusation, on July 23, 2021, that senior Meta executive sent an email to Surgeon General Murthy stating, “I wanted to make sure you saw the steps we took *just this past week* to adjust policies on what we are removing with respect to misinformation, as well as steps taken to further address the ‘disinfo dozen’: we removed 17 additional Pages, Groups, and Instagram accounts tied to the disinfo dozen....” Ex. 3, at 2. Again, on August 20, 2021, the same Meta executive emailed Murthy to assure him that Facebook “will shortly be expanding our COVID policies to further reduce the spread of potentially harmful content on our platform. These changes will apply across Facebook and Instagram,” and they included “increasing the strength of our demotions for COVID and vaccine-related content,” and “making it easier to have Pages/Groups/Accounts demoted for sharing COVID and vaccine-related misinformation.” Ex. 4, at 3. In addition, that senior Meta executive sent a “Facebook bi-weekly covid content report” to Surgeon General Murthy to White House official Andrew Slavitt, evidently to reassure these federal officials that Facebook’s suppression of COVID-19 “misinformation” was aggressive enough for their preferences. Ex. 4, at 6-19.

In another, similar exchange, on October 31, 2021, Deputy Assistant to the President Robert Flaherty emailed a contact at Meta with a link to a Washington Post article that complaining about the spread of COVID “misinformation” on Facebook. The email contained only the link to

that story with the subject line, “not even sure what to say at this point.” Ex. 3, at 19. The Facebook employee defended Facebook’s practices, and assured Mr. Flaherty that Facebook’s internal studies were intended to “improve our defenses against harmful vaccine misinformation,” and that Facebook had, in fact, “improved our policies,” *i.e.*, increased censorship of online speech. *Id.* Likewise, Alex Berenson disclosed internal Twitter communications—which Plaintiffs are expecting from Twitter in response to their subpoena—revealing that senior “WH” officials including Andrew Slavitt specifically pressured Twitter to deplatform Berenson, an influential vaccine critic—which Twitter did. Doc. 45, ¶¶ 187, 309. This pressure to deplatform Berenson appears to have occurred on April 21, 2021, when four Twitter employees participated in a Zoom meeting with at least three White House officials and one HHS official intended to allow the White House to “partner” with Twitter in censoring COVID-related “misinfo.” Ex. 7, at 86. The meeting invite stated: “White House Staff will be briefed by Twitter on vaccine misinfo. Twitter to cover trends seen generally around vaccine misinformation, *the tangible effects seen from recent policy changes*, what interventions are currently being implemented in addition to previous policy changes, and ways the White House (and our COVID experts) can *partner* in product work.” *Id.* (emphasis added). The next day, April 22, Twitter employees noted in internal communications that the White House officials had posed “tough” questions during this meeting, including “one really tough question about why Alex Berenson hasn’t been kicked off the platform.” *See* <https://alexberenson.substack.com/p/the-white-house-privately-demanded>.

Such communications from the White House impose maximal pressure on social-media companies, and they clearly get results when it comes to censorship. And federal officials are fully aware that such pressure is necessary to induce social-media platforms to increase censorship. CISA Director Jen Easterly, for example, texted with another CISA official about “trying to get us

in a place where Fed can work with platforms to better understand the mis/dis trends *so relevant agencies can try to prebunk/debunk as useful*,” and complained about the Government’s need to overcome the social-media platforms’ “hesitation” to working with the government: “Platforms have got to get more comfortable with gov’t. It’s really interesting how hesitant they remain.” Ex. 5, at 4 (emphasis added).

In fact, such pressures from government officials on social-media companies, along with the many public statements alleged in the Complaint, have succeeded on a grand scale. Discovery received so far indicates that a veritable army of federal bureaucrats are involved in censorship activities “across the federal enterprise.” They include the 45 key custodians identified in Plaintiffs’ interrogatory responses so far, 32 federal officials identified by Facebook so far, eleven officials identified by YouTube, and nine identified by Twitter (many of which do not overlap, either with each other or Defendants’ disclosures). And Defendants have not yet received interrogatory responses reflecting Defendants’ knowledge of federal officials at *other agencies* who communicate with social-media platforms about censorship – but apparently there are many. So many, in fact, that CISA Director Easterly and another CISA official apparently complained, in an internal text messages, that “chaos” would result if all federal officials were “independently” contacting social-media platforms about so-called misinformation: “Not our mission but was looking to play a coord role so not every D/A is independently reaching out to platforms which could cause a lot of chaos.” Ex. 5, at 4.

These federal bureaucrats are deeply embedded in a joint enterprise with social-media companies to procure the censorship of social-media speech. Officials at HHS routinely flag content for censorship, for example, by organizing weekly “Be On The Lookout” meetings to flag disfavored content, Ex. 6; sending lengthy lists of examples of disfavored posts to be censored,

Ex. 6, at 21-22; serving as privileged “fact checkers” whom social-media platforms consult about censoring private speech, Ex. 7; and receiving detailed reports from social-media companies about so-called “misinformation” and “disinformation” activities online, Ex. 4; among others. CISA, likewise, has aggressively embraced its “evolved mission” of screening complaints of social-media disinformation and then “routing disinformation concerns” to social-media platforms, Doc. 45, ¶¶ 250-251. CISA routinely receives reports of perceived “disinformation” and forwards them to social-media companies, placing the considerable weight of its authority as a federal national-security agency behind other parties’ demands for suppression of private speech. Ex. 8.

Moreover, many of these substantive communications from federal officials flagging specific posts and content for censorship seem to occur through alternative channels of communication that Plaintiffs have not yet obtained (as the third-party social-media platforms contend they are shielded from discovery by the Stored Communications Act). For example, Facebook trained CDC and Census Bureau officials on how to use a “Facebook misinfo reporting channel.” Ex. 9. Twitter offered federal officials a privileged channel for flagging misinformation through a “Partner Support Portal.” Ex. 9, at 69. YouTube has disclosed that it granted “trusted flagger” status to Census Bureau officials, which allows privileged and expedited consideration of their claims that content should be censored.

In the face of these and many other disclosures, Defendants are refusing to provide some of the most relevant and most probative evidence of the most egregious First Amendment violations. These issues are addressed below.

II. Status of Issues That Remain in Dispute.

A. Discovery Responses from the White House Press Secretary and Dr. Fauci as Chief Medical Officer to the President.

As authorized by the Court's order, Plaintiffs served interrogatories and document requests on the White House Press Secretary Karine Jean-Pierre (substituted for Jen Psaki in her official capacity), and Dr. Fauci in his capacity as Chief Medical Officer to the President. Ex. 1 (Collective Interrogatory Responses); Ex. 10 (Karine Jean-Pierre responses to RFPs); Ex. 11 (Fauci RFP responses). Defendants have categorically refused to produce any discovery from White House officials, and they have provided no interrogatory responses or responsive documents from them. *See, e.g.*, Ex. 1, at 6-7, 9-10, 20-21, etc. The parties have met and conferred on this point and failed to reach agreement.

1. Discovery from the White House officials is maximally relevant.

For all the reasons stated above, this discovery from White House officials is maximally relevant. *See supra* Part I. Among other things, this discovery will demonstrate the scope, the impact, the coercive pressure, and the powerful impact of the federal Censorship Enterprise. Needless to say, an email from a senior White House official demanding greater censorship of private speech raises by far the greatest First Amendment concerns. It is impossible to overstate the relevance and probative value of such communications, of which Defendants have provided several examples above.

2. Defendants' objections to this discovery lack merit.

In their Objections and Responses, Defendants have asserted a series of objections to this discovery from and relating to White House officials. All lack merit.

First, Defendants' categorical refusal to provide discovery responses from the White House Press Secretary and Dr. Fauci in his capacity as Chief Medical Advisor is inconsistent with this Court's order. Both the White House Press Secretary and Dr. Fauci were named as Defendants in their official capacities when Plaintiffs moved for expedited preliminary-injunction-related

discovery. The Court authorized Plaintiffs to “serve interrogatories and document requests upon Government Defendants,” Doc. 34, at 13, and the Court’s order did not exclude Ms. Jean-Pierre or Dr. Fauci, who were and are “Government Defendants.” *Id.* The Court’s order, therefore, expressly contemplated that Ms. Jean-Pierre and Dr. Fauci will participate in discovery.

Second, Defendants object that producing discovery from White House officials will be “unduly burdensome and disproportional to the needs of the case.” *See, e.g.*, Ex. 1, at 9. The Court has already considered and rejected this argument. As the Court noted in its Order, “[c]ertainly, it would be time-consuming to produce the information requested. However, this issue involves the alleged violation of a constitutional right – the right to free speech. Therefore, this Court feels the need for this information outweighs the burden to Government Defendants.” Doc. 34, at 12. This balancing of interests is still true today. In fact, given the sweeping nature of the Government’s censorship activities, and the maximally probative nature of the discovery sought – relating to pressure placed on private companies to censor private speech by some of the most powerful federal officials in the Nation – the value of the discovery decisively outweighs any burden on Defendants, and it is plainly “proportional to the needs of the case.” The fact that *White House* officials are engaged in communications with social-media companies encouraging and pressuring them to censor private speech on social-media places maximal pressure on such companies to comply, and thus raises the greatest of First Amendment concerns. Thus, the fact that these are extremely senior (and powerful) federal officials makes their communications with social-media platforms all the more probative of the coercion and pressure that has resulted in widespread First Amendment violations.

Third, Defendants make a blanket assertion of executive privilege and “presidential communications privilege” as to any and all discovery from the White House. Ex. 1, at 9-10. This

blanket assertion of privilege is detached from any specific document or communication, because Defendants refused to identify or produce any, so Defendants will be hard-pressed to justify it. In fact, Defendants do not even clearly assert that this privilege applies to any particular document or communication—they contend only that discovery “*may* have the effect of seeking information protected by the presidential communications privilege.” *Id.* at 9 (emphasis added). Needless to say, the fact that discovery “*may*” raise privilege concerns, unmoored from any actual document, is an attenuated objection, at best.

In any event, it is clear that the assertion of privilege is meritless, because Plaintiffs have made very clear in meet-and-confer with Defendants that they are not seeking any *internal* White House communications at all. Instead, Plaintiffs are requesting only the identification and production of *external* communications between White House officials and *third-party social-media platforms* – which is just what the Court authorized in its discovery order. Doc. 34, at 13 (authorizing discovery of “the identities of federal officials” who communicate with social-media platforms about censorship, “including the nature and content of those communications”). There is no plausible claim of privilege in communications between White House officials and *outside third-parties* like social-media platforms. *See, e.g., In re Sealed Case*, 121 F.3d 729, 741–42 (D.C. Cir. 1997) (holding that “the White House has waived its claims of privilege in regard to the specific documents that it *voluntarily revealed to third parties outside the White House*”) (emphasis added); *Center for Effective Government v. U.S. Department of State*, 7 F. Supp. 3d 16, 25, 27 (D.D.C. 2013) (holding that executive privilege applies to “protect the confidentiality of communications as between the President and his advisers,” and thus “documents distributed from the Office of the President for non-advisory purposes do not implicate the goals of candor, opinion-gathering, and effective decision-making that confidentiality under the privilege is meant to

protect”); *see also, e.g., UnitedHealthcare Ins. Co. v. Azar*, 316 F. Supp. 3d 339, 349 (D.D.C. 2018) (“[A] document that was privileged as part of the deliberative process can lose its privilege when revealed outside the agency.”); *O’Keefe v. Boeing Co.*, 38 F.R.D. 329, 335 (S.D.N.Y. 1965) (rejecting a claim of executive privilege over documents “not in the possession of the Air Force but in the possession of the defendant in this action, the Air Force having voluntarily turned them over to defendant”).

The cases that Defendants cite are all distinguishable on this very ground. In *United States v. Nixon*, “[t]he subpoena directed the President to produce certain tape recordings and documents relating to his conversations *with aides and advisers*,” 418 U.S. 683, 686 (1974) (emphasis added)—*i.e., internal*, confidential executive-branch communications between the President and his confidants, not *external* communications with outside third-parties, which are not privileged. *Id.* The next case the Government cites, *In re Sealed Case*, 121 F.3d 729, 743-44 (D.C. Cir. 1997), involved a subpoena to the White House Counsel for documents resulting from the President’s direction “to investigate” the Secretary of Agriculture “in order to advise the President on whether he should take executive action” against him based on allegations of improper gift-taking. *Id.* at 735. Again, the documents sought were *internal* documents relating to the advice given by the President by the White House Counsel – not *external* communications with social-media platforms. The same is true of *Judicial Watch, Inc. v. Dep’t of Justice*, in which the D.C. Circuit addressed whether “the presidential communications privilege extends into the Justice Department to *internal* pardon documents in the Office of the Pardon Attorney and the Office of the Deputy Attorney General that were not solicited and received by the President or the Office of the President.” *Judicial Watch, Inc. v. Dep’t of Justice*, 365 F.3d 1108, 1109 (D.C. Cir. 2004) (emphasis added) (quotation marks omitted). *American Historical Association v. NARA*, likewise,

involved a situation where “Plaintiffs seek access to documents from President Reagan’s tenure over which President Bush *has asserted constitutional executive privilege.*” *Am. Hist. Ass’n v. Nat’l Archives & Recs. Admin.*, 402 F. Supp. 2d 171, 180 (D.D.C. 2005) (emphasis added). In short, all the cases submitted by Defendants in support of this objection are plainly distinguishable because they involved plausible claims of privilege. There are no such claims here.

Further, even if there were any privilege to assert—which there is not—it would be waived in this case. Defendants have already disclosed numerous communications between White House officials and social-media platforms about misinformation, disinformation, and censorship of social-media speech—including communications involving White House officials like Andrew Slavitt, Courtney Rowe, and Clarke Humphrey, among others. *See* Ex. 3. Defendants, evidently, did not believe their own assertion of privilege in communications between White House officials and social-media platforms, because they have already disclosed many such communications, and they should not be allowed to assert that privilege selectively to pick-and-choose which White House communications with social-media platforms to disclose.

Fourth, Defendants object that Plaintiffs must seek discovery from other sources before imposing any burdens on officials of the White House or the Executive Office of the President. *See, e.g.*, Ex. 1, at 9. In particular, they object that discovery from the White House should not be granted because “Plaintiffs have not first exhausted all available opportunities to seek related information from other sources.” *Id.* This argument is both factually and legally meritless. First, it lacks a factual basis because Plaintiffs *have* pursued “*available* opportunities to seek related information from other sources.” *Id.* (emphasis added). Because this case is in an expedited preliminary-injunction posture, Plaintiffs simultaneously served third-party subpoenas on five major social-media platforms at the same time as pursuing discovery from Defendants, as this

Court authorized. Doc. 34, at 13. Plaintiffs then engaged in exhaustive negotiations with those social-media platforms to obtain “related information” from those “other sources,” just as Defendants contend we should. Ex. 1, at 9. And, despite the compressed time schedule, Plaintiffs obtained lists of federal officials—including several White House officials—who have or are engaged in communications with Twitter, Facebook, Instagram, and YouTube about misinformation and censorship of social-media content. Facebook and Instagram identified 32 federal officials, including eight current and former White House officials. YouTube identified 11 federal officials, including five current and former White House officials. Twitter identified nine federal officials, including at least one White House official. Plaintiffs promptly forwarded all this information to Defendants as soon as they received it and requested responsive communications from these officials be identified and produced. Defendants flatly refused. Thus, Plaintiffs *have* “exhausted all available opportunities to seek related information from other sources.” *Id.*

In any event, this objection is legally meritless, because Defendants have invented their “every other source first” rule out of whole cloth. To the extent that it exists, that rule does not apply to general discovery requests; rather, it applies only to discovery requests that would *force the Executive Branch to assert presidential privileges*. But, as discussed above, there can be no plausible assertion of privilege in federal officials’ communications about censorship with private third-parties outside the White House, such as social-media platforms. *See, e.g., In re Sealed Case*, 121 F.3d at 741–42 (holding that “the White House has waived its claims of privilege in regard to the specific documents that it voluntarily revealed to third parties outside the White House”). Plaintiffs’ discovery requests for communications with *outside third parties* do not implicate any privileges, and thus there is no “every other source first” rule.

Defendants' own case law confirms this conclusion. In their discovery objections, Defendants cite only three cases to support their supposed "every other source first" rule. First, Defendants rely heavily on *Cheney v. U.S. District Court*, 542 U.S. 367 (2004), which is cited 39 times in their interrogatory responses alone. *See* Ex. 1. *Cheney* addressed a discovery order that would have required the Vice President "assert executive privilege to protect sensitive materials from disclosure." *Id.* at 375. This burden does not exist in this case. In *Cheney*, the Court of Appeals had held that, "to guard against intrusion of the President's prerogatives," the Executive "must first assert privilege ... with particularity." *Id.* at 376. But the Supreme Court held that forcing the Executive Branch to assert presidential privileges with specificity, without adequate cause, would raise separation-of-powers concerns. *Id.* at 382. The Supreme Court rejected the lower court's holding that the Government could not pursue mandamus because "the Executive Branch can invoke executive privilege to maintain the separation of powers." *Id.* at 383. As the Supreme Court emphasized, the discovery sought potentially privileged material, as "[t]he discovery requests are directed to the Vice President and other senior Government officials who ... g[a]ve advice and make recommendations to the President." *Id.* at 385. Again, these were *internal* Executive Branch communications. Here, by contrast, Plaintiffs' discovery requests simply do not require any assertion of Executive privilege, because no such privilege applies to Executive communications with *outside* social-media platforms.

In fact, *Cheney* directly supports the appropriateness of discovery here. First, the Supreme Court in *Cheney* held that, in contrast to criminal cases, "the right to production of relevant evidence in civil proceedings does not have the same 'constitutional dimensions.'" *Id.* at 384. But here, where the White House communications at issue *perpetrate ongoing violations of the First Amendment*, the discovery sought plainly does have "constitutional dimensions." *Id.* For the same

reasons, in this case, “a court’s ability to fulfill its constitutional responsibility to resolve cases and controversies within its jurisdiction hinges on the availability of certain indispensable information.” *Id.* at 385. *Cheney* expressed concern that “production of confidential information would ... disrupt the functioning of the Executive Branch,” *id.* at 386, but here the information is not “confidential.” And finally, Plaintiffs here, in compliance with the Court’s order, have issued narrow, targeted discovery requests seeking only the identities of federal officials and that nature and content of their communications about misinformation and censorship with social-media platforms. *See* Doc. 34, at 13. This contrasts sharply with “the overly broad discovery requests” at issue in *Cheney*, which asked for “everything under the sky.” *Id.* at 386-87.

In addition, Defendants cite *Karnoski v. Trump*, 926 F.3d 1180, 1207 (9th Cir. 2009). This case is distinguishable on exactly the same ground. *Karnoski* vacated a discovery order and directed the trial court to reconsider it “because the district court did not fulfill its obligation ‘to explore other avenues, *short of forcing the Executive to invoke privilege.*’” *Id.* at 1207 (quoting *Cheney*, 542 U.S. at 390) (emphasis added). Here, by contrast, Plaintiffs’ discovery orders will not “forc[e] the Executive to invoke privilege,” *id.*, because there is no plausible claim of privilege in the White House’s communications with social-media companies outside the White House. Finally, Defendants cite an unpublished docket-text order of the District of Massachusetts that appears on PACER only as a docket entry with no document attached to it. Order, *Centro Presente*, No. 1:18-cv-10340 (D. Mass. May 15, 2019). Defendants’ citation of an unpublished docket entry with no opinion attached to it attests to the paucity of authority supporting their position. In any event, the order³ provides no support for Defendants’ position, because it specifically states that

³ Reproduced from PACER, the docket entry states in full: “Judge Denise J. Casper: ELECTRONIC ORDER entered re 74 MOTION to Compel Responses to White House Discovery Requests. In light of Plaintiffs' motion to compel, D. 74, Defendants' opposition, D. 77, and

“the Court does not necessarily agree with Defendants’ analysis and application of *Cheney v. U.S. District Court for the District of Columbia*,” and merely allowed the parties to “supplement the record as to the pending motion to compel discovery” as an “interim step.”

In short, the Court should order Defendants to provide complete interrogatory responses and responsive documents from Defendants White House Press Secretary Karine Jean-Pierre and Dr. Fauci in his capacity of Chief Medical Advisor to the President.

B. Defendants Must Identify and Provide Communications of Federal Agencies and Officials of Whom They Are Aware, *Outside Their Own Agencies*, Who Have Engaged in Responsive Communications With Social-Media Platforms.

Plaintiffs served Interrogatory No. 1 on all Defendants except the President (which, after the parties’ negotiations, Defendants call “Common Interrogatory No. 1.”). *See* Ex. 1, at 13. Interrogatory No. 1 asks Plaintiffs to “[i]dentify every officer, official, employee, staff member, personnel, contractor, or agent of [each Defendant] **or any other federal official or agency** who has communicated or is communicating with any Social-Media Platform regarding Content Modulation and/or Misinformation.” *Id.* (emphasis added). Thus, Interrogatory No. 1 asks each Government Defendant to identify, not just federal officials *within their own agency*, but also

Plaintiffs' reply, D. 79-1, and having heard oral argument on the motion, D. 85, the Court ORDERS as follows. Responses to requests for written discovery shall continue and be completed, including as to those sought from the United States Department of Homeland Security ("DHS"). After the completion of such discovery responses and the completion of the deposition of DHS (which the Court understands, at the request of the parties, D. 80, is currently stayed, D. 81), Plaintiffs may supplement the record as to the pending motion to compel discovery from the White House, particularly as to issue of any continuing need for discovery sought from the White House after full discovery is received from DHS. Although the Court does not necessarily agree with Defendants’ analysis and application of *Cheney v. U.S. District Court for the District of Columbia*, 542 U.S. 367 (2004), the Court concludes that this Order is an appropriate interim step in this case at this juncture. Accordingly, within two weeks after the completion of the DHS deposition, Plaintiffs may file a supplemental memorandum in support of their pending motion to compel. Defendants may then respond to such supplemental filing two weeks after the filing of the same. In light of this Order, the Court, at the moment, otherwise reserves any ruling on Plaintiffs' motion, D. 74. (Hourihan, Lisa) (Entered: 05/15/2019).”

federal officials of which they are aware at *other federal agencies* (including White House officials, if they know) who communicate with social-media platforms about misinformation and censorship. *Id.* In responding to these interrogatories, Defendants simply ignored the phrase “any other federal official or agency,” and provided responses that identified only federal officials in *their own* agencies. *See id.* at 15-18. Thus, in response to this interrogatory, Defendants identified 45 federal officials, but *only* federal officials at CDC, NIAID, CISA, DHS, and the Office of the Surgeon General, and none at any other federal agency. *Id.* Plaintiffs have repeatedly requested that Defendants supplement their interrogatory responses to provide this critical information about federal officials at other federal agencies, but Defendants have refused to do so, without any clear legal basis.

It is clear that Defendants are withholding significant, highly relevant information on this point. Through the information received in response to third-party subpoenas, the documentary discovery received so far, and recent explosive public disclosures (such as Mark Zuckerberg’s recent revelation about the FBI’s “disinformation” activities on Joe Rogan’s podcast), there has come an avalanche of revelations that many federal officials at *other* federal agencies are engaged in responsive communications about disinformation, misinformation, and censorship of private speech. For example, Defendants’ interrogatory responses identify no White House officials. But Defendants’ own document production includes several White House officials involved in such communication—such as Rob Flaherty, Andrew Slavitt, Clarke Humphrey, Courtney Rowe, and others—while Meta, Twitter, and YouTube have identified still more White House officials. Defendants’ interrogatory responses did not identify any officials at the FDA, the U.S. Election Assistance Commission, or the State Department, but Meta’s response to the third-party subpoena so far have identified senior FDA officials and U.S. Election Assistance Commission officials, and

Twitter’s response so far has identified senior State Department Officials. Defendants did not identify any Census Bureau officials, but YouTube disclosed several Census Bureau officials, and the emails Defendants produced reflect extensive involvement of CDC officials. Defendants did not identify any FBI officials, but six days ago (while Plaintiffs were negotiating with Meta about producing this very kind of information), Mark Zuckerberg revealed on Joe Rogan’s podcast that Facebook’s censorship of the Hunter Biden laptop story was the result of an FBI “disinformation” advisory—and the FBI responded by stating publicly that it “*routinely*” issues such “disinformation” related communications to social-media platforms. Ex. 12, at 2-3. In short, Defendants are plainly withholding highly relevant, responsive information by artificially narrowing their interrogatory responses on this point.

Further, the information sought (and withheld so far) is of critical and central relevance to Plaintiffs’ request for expedited preliminary-injunction-related discovery. As Plaintiffs emphasized in their motion for expedited discovery, discovering the identities of federal officials who are communication with social-media platforms about disinformation and censorship is essential to Plaintiffs’ ability to receive meaningful injunctive relief. *See, e.g.*, Doc. 18, at 1-3. As stated in that Motion, which the Court granted, “[t]he current lack of specific details about which federal officials are directly coordinating with social-media companies to censor Americans’ speech, and about the content and nature of communications between such federal officials (both known and unknown) and social-media platforms, threatens to frustrate the Court’s ability to grant effective preliminary injunctive relief....” *Id.* at 3. “A fully effective preliminary injunction ... will enjoin the specific actors most directly engaged in such unlawful activity, and their specific unlawful conduct. Some of these actors’ identities are known, but many are not, and few of their secret, direct communications with social-media platforms have been revealed.” *Id.* Even if

Plaintiffs obtain an injunction to prevent the currently named Defendants from urging and pressuring social-media companies to engage in censorship of private speech, such an injunction would have little practical effect if senior White House officials, FBI officials, FDA officials, State Department officials, EAC officials, and many others, are all allowed to continue imposing similar pressure.

Finally, responding to Interrogatory No. 1 involves no plausible claim of privilege (it requests the identities of federal officials who are communicating with *third-party* social-media platforms), and it is in no way unduly burdensome. The Defendant agencies and officials evidently know this information, and they must disclose it.

C. Defendants Should Provide Complete Interrogatory Responses from HHS and from Dr. Fauci in his Capacity as NIAID Director, and Produce Responsive Communications as Applicable.

Defendants also artificially limited the scope of their responses to Interrogatory responses from HHS and from Dr. Fauci in his capacity as NIAID director. (They refused to provide any discovery at all relating to Dr. Fauci’s capacity as Chief Medical Advisor to the President, *see supra*, Part II.A) These artificial limitations, which lack any legal basis, appear likely to deprive Plaintiffs of highly relevant information. Plaintiffs have met and conferred with Defendants about this issue, but it remains unresolved.

First, as to HHS’s responses: Plaintiffs named as Defendants, and served discovery requests on, *both* HHS itself *and* three of its components: CDC, NIAID, and the Surgeon General. *See* Ex. 1, at 3 (“As the least burdensome sources of information consistent with Rules 26 and 33 that is potentially responsive to the Interrogatories, HHS has identified the Office of the Surgeon General (OSG), NIAID, and CDC...”). In other words, HHS did not provide any information from *its own* senior officials in responses to interrogatories—instead, it solely provided information

from its components in the Surgeon General’s Office, NIAID, and CDC, all of whom were already subject to the same interrogatories. HHS, thus, effectively exempted itself from the discovery responses through this “identification.” But on August 28, 2022, in response to Plaintiffs’ third-party subpoena, Meta disclosed several HHS officials as likely engaged in responsive communications with Meta about modulation of content on Facebook and Instagram—including very senior HHS officials *outside* NIAID, the CDC, and the Office of the Surgeon General. Meta’s identifications include, for example, HHS’s Deputy Assistant Secretary for Public Engagement, the head of HHS’s Digital Engagement Team, the Deputy Director of the Office of Communications in HRSA, and HHS’s Deputy Digital Director, among others—none of whom was disclosed in HHS’s responses to Plaintiffs’ interrogatories. Thus, HHS’s decision to “identify” NIAID, CDC, and OSG as its components “likely” to have discoverable information appears crafted to avoid disclosing the identities and communications of *the most senior HHS officials* involved in such communications with social-media platforms. HHS should be required to provide complete responses, in addition to the responses of CDC, NIAID, and OSG, in response to all Plaintiffs’ discovery requests (to include both Interrogatories and the accompanying Requests for Production, *see* Ex. 13, which seek production of the relevant communications).

Second, as to Dr. Fauci’s responses: In responding to discovery requests directed to Dr. Fauci in his capacity as NIAID director, the *only* step Defendants took to identify responsive information was to engage in keyword searches of Dr. Fauci’s NIAID government email account. *See, e.g.*, Ex. 1, at 46, 48. Further, in response to Interrogatories 1 to 5, Defendants did not provide separate responses from Dr. Fauci at all, but merely responded on behalf of NIAID—again, by searching Dr. Fauci’s government email account and the email accounts of other NIAID custodians for key words and taking no other action to locate responsive information. *See id.* at 48. Based

on these responses and Plaintiffs' meet-and-confer with Defendants, it has become clear that Defendants' counsel never actually *inquired of Dr. Fauci* about what he knows of his relevant communications with social-media platforms, and thus that critical input is not reflected in the responses. Thus, for example, in responding to Plaintiffs' interrogatories to identify and produce all relevant communications with social-media platforms, Defendants' responses include no information about Dr. Fauci's oral communications with social-media companies, or communications through any medium other than Dr. Fauci's NIAID email account.

Again, this artificially narrowed approach appears tailored to avoid the production of highly relevant information. The First Amended Complaint includes extensive allegations about Dr. Fauci and his communications with social-media companies like Meta. And the discovery produced so far raises the concern that there may be responsive information. For example, in March 2020, Mark Zuckerberg provided Dr. Fauci with his personal cell phone number, demonstrating the opportunity for follow-up phone conversations. And on August 28, 2022, Meta disclosed Dr. Fauci in its list of 32 federal officials who may have communicated with Meta about content modulation on Facebook and Instagram. In his interrogatory responses, Dr. Fauci is required to identify and describe the "nature and content" of any such communications, and in response to requests for production, he is obligated to produce any such written communications not already produced. After meeting and conferring, Defendants have agreed to supplement Dr. Fauci's responses to Interrogatories 8 and 9 directed to Dr. Fauci, but they have not agreed to supplement Dr. Fauci's responses to Interrogatories 1 to 5 directed to Dr. Fauci, and they have not agreed to produce any responsive communications identified in those responses. Dr. Fauci should be ordered to provide complete responses to all seven interrogatories served on Dr. Fauci, and to produce relevant documents identified in those responses.

D. The Court Should Permit Plaintiffs to File a Second Amended Complaint and Serve Expedited Discovery Requests on Newly Identified Federal Officials Who Are Pressuring Social-Media Platforms to Engage in Censorship.

As noted above, even the limited discovery provided so far has produced an avalanche of revelations about new federal officials, not previously publicly disclosed, who are or have engaged in communications with social-media platforms about misinformation, disinformation, and censorship of private speech. These include senior White House officials and officials at the State Department, the FDA, the Census Bureau, the U.S. Election Assistance Commission, and the Treasury Department, among others. Moreover, six days ago, Mark Zuckerberg disclosed the involvement of the FBI in communications about “disinformation” with social-media platforms, and the FBI confirmed that it “routinely” send such communications. With each of these new revelations, Plaintiffs have approached Defendants and requested that they supplement their discovery responses to include responsive communications from the newly disclosed federal officials. Defendants have refused to do so, on the grounds that none of these newly discovered officials have been sued or served with discovery as yet, and that it would be unduly burdensome to identify and produce their communications. Plaintiffs have replied that these officials have not yet been sued or served because their identities and involvement were concealed from the public until now, and that receiving discovery from these officials is essential to Plaintiffs’ ability to receive effective injunctive relief. *See* Doc. 18, at 1-3. Again, an injunction against officials at DHS and HHS will have limited effect if senior officials at the White House, the FBI, the FDA, the State Department, the Census Bureau, the EAC, and other federal agencies may continue to pressure social-media companies to censor private speech.

To address Defendants’ objection that these officials and agencies have not been sued or served with discovery, Plaintiffs propose the following procedure: Within two business days of

this Court’s ruling on these disputed discovery issues, if not before, Plaintiffs will file a Second Amended Complaint with leave of the Court that names as Defendants additional federal officials and agencies that Plaintiffs have identified so far whom current information indicates are or have engaged in communications with social-media platforms about misinformation, disinformation, malinformation, and any censorship and suppression of speech on social media. In addition, within two business days of this Court’s ruling on these disputed discovery issues, Plaintiffs will serve interrogatories and document requests on the newly named Defendants, seeking the same discovery this Court has already authorized—*i.e.*, “the identity of federal officials who have been and are communicating with social-media platforms about disinformation, misinformation, malinformation, and/or any censorship or suppression of speech on social media, including the nature and content of those communications.” Doc. 34, at 13. The Court should order the new Defendants to respond in 14 days to those discovery requests, as the Government has already been on notice of Plaintiffs’ request for this information for several days. This approach will accommodate Defendants’ objections while avoiding interjecting undue delays into the ongoing discovery schedule already adopted by the Court. *See* Doc. 34, at 13-15.

E. The Court Should Not Authorize Defendants’ Last-Minute, Retaliatory Request for “Reciprocal Discovery.”

Yesterday, the day before this Joint Statement is due, Defendants notified Plaintiffs that they would request “reciprocal discovery” against the Plaintiffs in this Joint Statement, if the Court ordered any further discovery from Defendants. Defendants declined to specify the precise nature of the discovery they would seek, and they declined to provide copies of any potential discovery requests. Plaintiffs’ only specific information about this request, therefore, comes from one previous email chain from August 27, 2022, in which Defendants’ counsel stated “we want to note that if Plaintiffs are going to seek additional discovery, we may also seek discovery from

Plaintiffs,” and stated that Defendants might seek discovery of communications between State officials and social-media platforms. *See* Ex. 12, at 2. To the extent Defendants make this request, the Court should reject it, for several reasons.

First, the request is untimely. Plaintiffs moved for expedited preliminary-injunction-related discovery on June 17, 2022—ten weeks ago. Docs. 17, 19. The Court granted this motion on July 12, 2022—six weeks ago. Doc. 34. The Court adopted a specific, detailed discovery plan for such discovery, under which the parties have been operating for six weeks. During all this time, Defendants never suggested that they would request reciprocal discovery until August 27, 2022. Ex. 12, at 2. This suggestion came very late in the process, and just as Plaintiffs were requesting highly relevant disclosures that the Government seems particularly eager to avoid making—*i.e.*, the communications between the FBI and Meta that led to the censorship of the Hunter Biden laptop story on Facebook and Instagram. *See* Ex. 12, at 2-3. Under the circumstances, the request is plainly untimely and would serve no useful purpose but to delay the adjudication of Plaintiffs’ motion for preliminary injunction, which has been pending since June 14, 2022.

Second, the discovery is evidently sought for an ulterior, improper purpose—*i.e.*, to retaliate against Plaintiffs and attempt to deter Plaintiffs from seeking particularly relevant and probative disclosures from the Government. In particular, Defendants raised this issue of seeking “reciprocal discovery” for the very first time only in response to Plaintiffs’ demand for the FBI’s communications with Meta that led to the censorship of the Hunter Biden laptop story, which Mark Zuckerberg disclosed in an explosive revelation on Joe Rogan’s podcast last Thursday. Ex. 12, at 2-3. Moreover, the FBI’s public response to this disclosure stated that it “*routinely*” engages in such disinformation-related communications with social-media platforms. *Id.* at 3. Naturally, the

Government is eager to avoid making such disclosures. *See id.* at 1-2. Furthermore, the Government's threat to seek such discovery explicitly *admitted that the Government does not think such discovery would be probative* on any disputed issues. *Id.* The Government's attorney explicitly stated, of the discovery DOJ plans to seek: "*Of course, we do not suggest that we necessarily find those communications to be problematic.*" *Id.* at 2 (emphasis added). In other words, DOJ admits that it would not be seeking such discovery for its probative value. Thus, the context demonstrates that the Government seeks such discovery only for an improper, ulterior purpose—namely, to retaliate against Plaintiffs for their own discovery requests and to seek to deter Plaintiffs from pursuing particularly relevant, probative information.

Third, the retaliatory discovery the Government belatedly seeks would have little or no probative value—as the Government itself admits. *See id.* The Government threatened that it will seek communications between State officials and social-media companies about censorship. *See id.* But the Government does not contend that such State officials have engaged in a long campaign of threats and coercive pressure against social-media companies to pressure them to comply with such requests, as Plaintiffs allege the *federal* officials have done in great detail. *See* Doc. 45. Further, unlike the federal Government, neither Missouri nor Louisiana has a unitary executive branch; their Attorneys General are separately elected by the people, and authorized under State law with full authority to represent the State's interests in court. Statements by other state officials who report to separately elected officials thus are not attributable to Missouri and Louisiana's Attorneys General, and thus they would be discoverable only through third-party subpoenas, not discovery requests directed to Missouri's and Louisiana's Attorneys General. Even more, the First Amended Complaint includes several *private* Plaintiffs, for whom such communications would have no plausible relevance to their claims. In addition, the First Amendment does not contain an

“unclean hands” exception, and even if State officials unlawfully pressured social-media platforms to censor speech, that would have no relevance to the Government’s violations of the First Amendment.

Finally, in yesterday’s meet-and-confer, the Government stated for the first time that it might seek “reciprocal discovery” related to Plaintiffs’ standing. But this Court has already addressed this issue in detail and determined that Plaintiffs have standing, Doc. 34, at 3-9, and Defendants provide no plausible reason to revisit that conclusion. Therefore, such discovery would serve no useful purpose. Moreover, discovery regarding Plaintiffs’ standing, if appropriate at all, would be the proper subject of a “factual attack” on the Court’s jurisdiction brought under Rule 12(b)(1) of the Federal Rules of Civil Procedure. Defendants were served with the Complaint on May 10, 2022, and thus they have had almost four months to file such a motion, but they have never done so. If they wish to seek jurisdictional discovery regarding Plaintiffs’ standing, they should file a Rule 12(b)(1) motion and a motion for jurisdictional discovery, to which Plaintiffs could respond and the Court could rule in due course. They should not be allowed to belatedly interject this issue to retaliate and delay Plaintiffs’ motion for preliminary-injunction-related discovery that was filed 10 weeks ago and granted six weeks ago.

* * *

WHEREFORE, for the reasons stated, Plaintiffs respectfully request that this Court:

1. Order Defendants White House Press Secretary Karine Jean-Pierre and Dr. Fauci in his capacity as Chief Medical Advisor to the President to provide complete responses to Plaintiffs’ interrogatories and document requests.

2. Order all Defendants who were served with Interrogatories to identify federal officials and agencies *outside their own agencies* who have or are engaged in communications with social-

media platforms about misinformation, disinformation, malinformation, and/or censorship or suppression of speech on social-media, and produce any such communications in their possession.

3. Order Defendant Health and Human Services (HHS) and Dr. Fauci in his capacity as NIAID Director to provide complete responses to Plaintiffs' interrogatories and document requests as discussed herein.

4. Grant Plaintiffs leave to file a Second Amended Complaint suing newly identified federal officials and agencies, whose identities have been revealed during the discovery process, and to serve similar expedited discovery requests on them, within two business days of the Court's ruling on these disputed issues, and order those new Defendants to respond within 14 days.

5. Deny Defendants' belated and retaliatory request to seek reciprocal discovery against Plaintiffs.

DEFENDANTS' POSITION

Plaintiffs moved for “leave to conduct specific, targeted, narrow discovery in support of their Motion for Preliminary Injunction.” Pls.’ Mem. in Support of their Mot. for Expedited Prelim. Inj.-Related Disc. at 3, ECF No. 18 (“Mot.”). This Court granted their request in part, noting that “[e]xpedited discovery is not the norm” and should be “reasonable[] . . . in light of all the surrounding circumstances,” Mem. Ruling and Order at 9, ECF No. 34 (“Order”), and authorizing discovery “targeted to the specific allegations of Plaintiff States’ Complaint” “for purposes of the pending Motion for Preliminary Injunction,” *id.* at 12.

The discovery that Plaintiffs ultimately sought was anything but reasonably tailored. Nevertheless, in the thirty days provided by this Court, Defendants provided written responses and objections to requests for production, while also producing substantive interrogatory responses and roughly 15,000 pages of documents. Given this breadth of produced information, Plaintiffs cannot suggest that they are lacking in the facts that they deemed necessary at the outset of this case to litigate their pending preliminary injunction motion. Nonetheless, Plaintiffs ask this Court to resolve a series of unjustified disputes that would only prolong Plaintiffs’ purportedly time-sensitive motion. Plaintiffs, in short, seek to treat the extraordinary discovery process authorized by this Court as if it were the full discovery process provided by the Federal Rules of Civil Procedure, faulting Defendants for objecting to requests that are grossly disproportionate to this stage of the proceedings while they themselves seek to expand their already-too-broad requests after the prescribed deadline.

In an effort to resolve outstanding discovery disputes, Defendants have proposed to respond to certain additional targeted requests that may be completed expeditiously and thereby aid the swift resolution of the preliminary injunction motion, as Plaintiffs originally sought. The

Court should decline to order the expansive additional discovery sought by Plaintiffs and instead should, at most, order the targeted, supplemental interrogatory responses that Defendants have offered in the parties' meet and confer. *Infra* Section II. Such a process would allow the parties to resolve promptly any issues relating to depositions and then to complete briefing on the preliminary injunction motion and Defendants' forthcoming motion to dismiss Plaintiffs' Amended Complaint.

If the Court were inclined to order the more expansive discovery Plaintiffs demand, it should do so only after resolving the pending motion for preliminary injunction and forthcoming motion to dismiss and addressing the significant jurisdictional issues at the heart of this case. Defendants' motion to dismiss the original Complaint raised serious arguments that Plaintiffs lack Article III standing—arguments not before the Court when it reached a preliminary decision on standing in its discovery order, including under Supreme Court precedent foreclosing *parens patriae* actions by states against the federal government. *Alfred L. Snapp & Son, Inc. v. Puerto Rico ex rel. Barez*, 458 U.S. 592, 610 n.16 (1982) (citing *Massachusetts v. Mellon*, 262 U.S. 447, 485-86 (1923)). This Court's preliminary conclusion otherwise for the limited purposes of granting expedited discovery targeted to the Complaint, predated the full briefing on this issue. And while the States have now added individual plaintiffs to the action in an attempt to shore up their standing, Defendants' forthcoming motion to dismiss the Amended Complaint will demonstrate why the individual plaintiffs' claims suffer from the same fundamental jurisdictional defects identified in Defendants' original motion. In particular, like the States, the individual plaintiffs cannot show causation and redressability for purposes of Article III standing, as the alleged injuries hinge on the "unfettered choices made by independent" social media companies "not before the court and whose exercise of broad and legitimate discretion the [C]ourt[] cannot presume to either

control or predict.” *Defenders of Wildlife*, 504 U.S. at 562 (quoting *Allen v. Wright*, 468 U.S. 737, 758 (1984), *abrogated on other grounds by Lexmark Int’l, Inc. v. Static Control Components, Inc.*, 572 U.S. 118 (2014)). For that reason, among others, courts across the country have dismissed claims by individual users of social media materially similar to the individual plaintiffs’ claims here.⁴ Authorizing the extensive discovery that Plaintiffs demand—essentially, on the whole of the federal government—before the Court resolves the forthcoming motion to dismiss addressing whether this Court has jurisdiction to hear the case at all, *Steel Co. v. Citizens for a Better Env’t*, 523 U.S. 83, 89 (1998), would impose needless and additional extensive burdens on the parties and the Court.

Furthermore, even if the Court were to continue to conclude that it has subject matter jurisdiction over the case, the Court should resolve Plaintiffs’ pending preliminary injunction motion before allowing Plaintiffs to conduct any further written discovery, including by serving new requests on non-Defendant federal agencies and officials. Plaintiffs seek further discovery to, among other things, determine whether other federal actors beyond like HHS and DHS have communicated with social media companies about the harms of misinformation—communications which, as Defendants will argue, are routine and do not amount to a First Amendment violation. The Court should thus first assess, through a decision on the preliminary injunction motion, whether communications of that nature do indeed run afoul of the First Amendment. If it agrees with Defendants that those communications—which occurred even in the last Administration—are not problematic, then the additional discovery Plaintiffs seek would not support a viable First

⁴ *Changizi v. Dep’t of Health & Hum. Servs.*, --- F. Supp. 3d ---, 2022 WL 1423176 (S.D. Ohio May 5, 2022), *appeal filed*, No. 22-3573 (6th Cir. June 30, 2022); *Hart v. Facebook Inc.*, Case No. 22-cv-00737-CRB, 2022 WL 1427507 (N.D. Cal. May 5, 2022); *Ass’n of Am. Physicians & Surgeons v. Schiff*, 518 F. Supp. 3d 505 (D.D.C. 2021) (“*AAPS I*”), *aff’d* 23 F.4th 1028 (D.C. Cir. 2022).

Amendment claim and would thus be unnecessary. Alternatively, the Court’s clarification of the issues in dispute on the merits would provide a helpful guide to the scope of future discovery (if any) to resolve those claims.

At the very least, if the Court is inclined to authorize extensive additional discovery prior to ruling on these motions, it should stay the discovery for a period of thirty days to allow the Solicitor General to consider whether or not to seek immediate appellate review.

I. Background to the Current Dispute

Plaintiffs moved for expedited discovery in June 2022 and, in their supporting memorandum, stated repeatedly that they sought “leave to conduct specific, targeted, narrow discovery in support of their Motion for Preliminary Injunction.” Mot. at 3; *id.* at 1 (Plaintiffs seek “expedited preliminary-injunction-related discovery on a limited basis”); *id.* at 12 (noting that Plaintiffs seek “narrow, carefully targeted discovery—such as responding to targeted interrogatories and document requests”). Plaintiffs also asked the Court to set a compressed discovery schedule and acknowledged that their “requested discovery” would have to “be reasonably tailored to [those] time constraints[.]” *Id.* at 10 (*citing Amos v. Taylor*, No. 4:20-CV-7-DMB-JMV, 2020 WL 5809972, at *6 (N.D. Miss. Aug. 26, 2020)) The Court ultimately authorized expedited discovery, and set a compressed schedule, under which Defendants had “thirty days following receipt of Plaintiff States’ discovery requests” to provide “responses and/or objections” to those requests. The Court emphasized, however, that “[e]xpedited discovery is not the norm” and that it must be “reasonable[] . . . in light of all the surrounding circumstances.” Order at 9.

Despite the States' repeated representations that they sought only "narrow" and "carefully targeted discovery," Mot. at 12, they ultimately served ten sets of interrogatories⁵ and eight sets of requests for the production of documents—totaling well over one hundred discovery requests—on a slew of federal agencies and officers. On an expedited timeframe, Defendants identified relevant custodians, pulled relevant documents, loaded those documents into a review platform, reviewed and processed them, and ultimately produced roughly 15,000 pages of documents along with interrogatory responses.

The parties then engaged in a meet and confer process in which Defendants made additional efforts to address objections raised by Plaintiffs, and to do so as expeditiously as possible. As a consequence of the parties' initially productive meet and confer process, several disputes were resolved. For instance, at Plaintiffs' request: Defendants agreed to produce organizational charts from Defendant agencies that technically fell outside the bounds of authorized discovery; Defendants agreed to produce additional email communications between Dr. Fauci and Mark Zuckerberg that fell outside the scope of discovery; Defendants agreed to provide Plaintiffs with an "overlay" file to allow them to extract certain metadata from the documents that the time constraints of expedited discovery did not practically permit Defendants to produce along with the 15,000 pages of documents; Defendants agreed to provide additional responses to specific interrogatories; and the parties reached several other agreements. On Friday, August 27, the parties

⁵ Plaintiffs initially served 110 interrogatories. Prior to the 30-day deadline for service of objections and responses, Defendants objected to the interrogatories because they exceeded the 25-interrogatory limit in the Federal Rules. During subsequent discussions, Plaintiffs agreed to select the first five interrogatories served on CDC to apply to all Defendants on whom interrogatories had been served (the "Common Interrogatories") and to select twenty additional interrogatories directed at particular Defendants as specified by Plaintiffs ("Additional Interrogatories").

jointly sought a modest extension to the deadline for filing this Joint Statement because of the progress they were making during their meet-and-confer discussions.

Nonetheless, Plaintiffs contend that they are entitled to even more discovery. Just over the past several days, Plaintiffs have raised new disputes and demanded additional discovery from officials not named in the Complaint or the preliminary injunction motion. Plaintiffs do not suggest, however, that additional discovery is necessary to resolve their pending preliminary-injunction motion, as they must in the context of expedited discovery. *BKGTH Prods., LLC v. Does 1-20*, CIV.A. No. 13-5310, 2013 WL 5507297, at *5 (E.D. La. Sept. 30, 2013) (“A party seeking expedited discovery must narrowly tailor their requests in scope to the *necessary* information they seek.” (emphasis added)); *Amos v. Taylor*, No. 4:20-CV-7-DMB-JMV, 2020 WL 7049848, at *5 (N.D. Miss. Dec. 1, 2020) (the “party seek[ing] to compel *expedited discovery*” must show “that the requested discovery falls within the scope of permitted expedited discovery—in other words, that it is narrowly tailored to obtain information relevant to a preliminary injunction determination” (emphasis in original)). Instead, they argue only that they requested additional information, and that such information may be relevant to their claims, as one would in the process of ordinary civil discovery. Although Plaintiffs initially sought a quick resolution of their preliminary injunction motion, *see* Mot. at 3 n.1 (claiming that the issues in this litigation “are particularly time-sensitive and urgent”), they now effectively ask the Court to extend and expand the discovery process originally authorized by this Court.

Although Plaintiffs have described for Defendants, in general terms, the discovery-related relief they planned to seek, Plaintiffs failed to provide a copy of their section of this Joint Statement in advance of filing to ensure that Defendants could address all of the disputes raised, or any questionable and unproven characterizations included, in Plaintiffs’ section. Nevertheless, based

on Plaintiffs' oral and written communications, Defendants understand that the disputes Plaintiffs plan to raise herein will fall within two categories: (1) disputes over discovery requests served on July 18; and (2) disputes over new discovery requests proposed for the first time in the parties' meet and confer discussions, which requests have not been served on any Defendant. As Defendants contend below, none of Plaintiffs' demands has merit. Defendants' expedited discovery responses and productions to date have been reasonable, and Plaintiffs do not contest that are able to litigate their preliminary injunction motion with the materials they have received.

II. Defendants responded adequately to Plaintiffs' discovery requests served on July 18 and have offered reasonable compromises to address Plaintiffs' demands exceeding the expedited discovery that the July 12 Order allowed.

Plaintiffs raise several objections to the adequacy of Defendants' searches for information responsive to the interrogatory and document requests served on July 18. For the items for which Defendants have proposed compromises, as specified below, the parties were still conferring up to the time of filing and continue to confer in hopes of reaching a resolution on their own. To the extent no agreement is reached, Plaintiffs' requests for broad discovery must be denied and Defendants' proposed reasonable compromises should otherwise be adopted. First, Plaintiffs request that Defendant agencies respond to interrogatories and document requests by identifying officials across the federal government who have communicated with social media companies. Although this request is facially unreasonable in the context of expedited discovery, Defendants offer below a reasonable compromise. The Court should not grant Plaintiffs' unreasonable request for responses that go beyond the scope of authorized expedited discovery. Second, Plaintiffs seek broad supplemental discovery responses from Dr. Fauci, beyond Defendants' agreement to provide, over the next three weeks in a manner consistent with the demands of expedited discovery, responses to specific and targeted discovery requests directed to Dr. Fauci. Third, Plaintiffs assert that Defendants' search for HHS custodians was unreasonable and demand that they conduct a

new search through every HHS component, despite HHS's prior due diligence to identify custodians most likely to have responsive information and to focus their searches for information and documents, using Plaintiffs' search terms, on those custodians. The Court should deny this request because Plaintiffs do not show that additional searches of officials in agency components that were not the focus of Plaintiffs' allegations is necessary to resolve the preliminary injunction motion or proportional to the needs of the case. And their conclusory assertion that the agency has actively concealed information is unsupported and contradicted by its already voluminous production of documents in response to Plaintiffs' requests. Fourth, Plaintiffs' request that Defendants respond to interrogatories on behalf of DHS by conducting additional ESI searches would impose disproportional and undue burdens on Defendants. Fifth, Plaintiffs' request for intrusive discovery from the White House, before exhausting alternative avenues (and before the Court resolves the forthcoming motion to dismiss), goes beyond the scope of Plaintiffs' initial requests, is unnecessary to resolve the preliminary injunction motion, and raises significant separation of powers concerns. This request, likewise, must be denied.

A. Plaintiffs are not entitled to additional searches pertaining to agencies not named in the Complaint.

Plaintiffs first demand that, in response to interrogatories, Defendants identify officials outside their own agencies, and across the entire federal government, who have communicated with social media companies—even if conduct of those officials is not even mentioned, let alone alleged to be illegal, in the original Complaint. The dispute centers on Common Interrogatory 1, in conjunction with requests seeking production of all documents relied on in responding to that request. As originally served, Common Interrogatory 1 reads: “Identify every officer, official, employee, staff member, personnel, contractor, or agent of” recipient Defendant “or any other

federal official or agency who has communicated or is communicating with any Social-Media Platform regarding Content Modulation and/or Misinformation.”

Especially in the context of expedited discovery, it would be unduly burdensome and disproportional to the needs of this case to require Defendants to sift through thousands of communications and identify officials from outside agencies who have communicated with social media companies, in response to Plaintiffs’ interrogatories. Complying with this request would not only be impossible within the expedited period provided for current discovery, it would be unnecessary in light of the thousands of external communications Defendants have already produced. Through those productions, much of this information is *already available* to Plaintiffs. It would be far less burdensome for Plaintiffs to consult these documents. Fed. R. Civ. P. 26(b)(2)(C)(i) (a district court must limit the scope of discovery if “the discovery sought is unreasonably cumulative or duplicative, or can be obtained from some other source that is more convenient, less burdensome, or less expensive). As written, Plaintiffs’ requests that Defendants identify government actors who were not even alleged through bare legal conclusions, let alone facially plausible allegations in the Complaint, to have engaged in the conduct alleged in the Complaint or related preliminary injunction motion for which expedited discovery was authorized, are not “targeted” or “reasonable,” Order at 12.

Nonetheless, recognizing that the Court’s July 12 Order authorizes expedited discovery targeted to the original Complaint so that Plaintiffs can attempt to build a record to support their preliminary injunction application, Defendants offered reasonable compromises to address Plaintiffs’ requests. In particular, during the meet-and-confer, Defendants offered in good faith to focus the inquiry underlying Common Interrogatory 1 by drawing on what is *known* to those agency Defendant custodians who currently are employed by the agency Defendants—*i.e.*, asking

those currently-employed custodians to identify other agencies known to have communicated, or to be in communication with, platforms concerning misinformation.⁶ Because responding to the interrogatory as so reformulated entails significant additional efforts to interview the custodians beyond the efforts Defendants diligently undertook within the initial 30 days the Court set for responding to Plaintiffs' expedited discovery requests and interrogatories, Defendants proposed to provide their response to the reformulated interrogatory three weeks from the filing of this Joint Statement. Any other response would be unduly burdensome and disproportional to the needs of the case, especially in the context of expedited discovery.

Defendants' proposed compromise would not entail conducting any additional searches for information or documents from non-Defendant agencies that are not within their custody or control. Nor should it require Defendants to undertake any new searches. Doing so would be immensely more burdensome and would effectively require a re-opening of document discovery for which Defendants have already provided voluminous responses. Thus, Defendants' proposal is the only reasonable construction of Common Interrogatory 1 that accounts for the practical limitations inherent in expedited preliminary injunction discovery as authorized by this Court.

Requested Relief: Accordingly, should the Court find any remaining dispute, it should adopt Defendants' reasonable compromise proposal, setting the due date for the response to new Common Interrogatory 6 at three weeks from today, *i.e.*, September 21, 2022, and ordering that the response be *without* any new searches for ESI. Further, although Defendants maintain their objections to discovery on the White House as outlined below, under this proposal, an agency

⁶ Common Interrogatory No. 6 as Defendants proposed it on August 29 would read: "Identify non-Defendant federal agencies or officials who are known to have communicated or to be communicating with any Social-Media Platform regarding Content Modulation or Misinformation, excluding communications produced by Defendants to date in this action or described in their interrogatory responses of August 17, 2022."

Defendant will identify White House officials but only subject to personal knowledge and when the agency and the White House participated in the communication(s) at issue. (Defendants have accepted Plaintiffs' request that the response to Common Interrogatory 6 cover the same period as Plaintiffs' other requests, *i.e.*, from January 1, 2020.)

B. The Court should reject Plaintiffs' expansive requests for supplemental responses from Dr. Fauci.

To narrow the disputed issues, Defendants offered to supplement their responses to two interrogatories as to Dr. Fauci: Additional Interrogatory No. 5 (Dr. Fauci No. 8), and Additional Interrogatory No. 6 (Dr. Fauci No. 9). Plaintiffs signaled approval of that offer but insisted that any further response be based on additional searches of electronically stored information—a condition to which Defendants could not agree. Defendants' proposed compromise was reasonable in light of the severe time constraints resulting from the expedited discovery timetable. At any rate, Plaintiffs quickly pivoted to making new demands that Defendants supplement their answers to other interrogatories (Common Interrogatory Nos. 1-5) addressed to Dr. Fauci—demands not previously aired in the initial two meet-and-confer sessions. The Court should reject the contention that Defendants should be required to provide responses to any more of the interrogatories directed at Dr. Fauci than Defendants have agreed to provide, as Defendants have offered reasonable responses within the time constraints of expedited discovery.

Additional Interrogatory No. 5, concerning communications with Mark Zuckerberg of Facebook, reads: "Identify all Communications with Mark Zuckerberg from January 1, 2020 to the present, including but not limited to those referenced in Paragraphs 142-145 of the Complaint." Additional Interrogatory No. 6, concerning communications with social media platforms related to COVID-19, reads: "Identify all Communications with any Social-Media Platform that relate to the Great Barrington Declaration, the authors of the Great Barrington Declaration, the original

signers of the Great Barrington Declaration,” other various individuals, “the Wuhan Institute of Virology, EcoHealth Alliance, and/or any member of the so-called ‘Disinformation Dozen.’”

As to each of these interrogatories, Defendants reasonably identified the communications from Dr. Fauci they produced in response to Plaintiffs’ parallel RFPs, stating that those responses provided a more expeditious and significantly less burdensome method for Plaintiffs to obtain the information sought, considering the expedited nature of the discovery here and the broad scope of the Interrogatories. Fed. R. Civ. P. 26(b)(2)(C)(i); *see also* Fed. R. Civ. P. 33(d).

Plaintiffs objected, contending that Defendants were required to undertake “separate effort to inquire of Dr. Fauci whether he is aware of any other (non-email) communications, whether oral or written” and seeking from Dr. Fauci “good-faith and comprehensive efforts,” including as to “communications via channels other than his government email.” Although Defendants had reasonably confined their document production and related interrogatory responses to email communications in an effort to provide meaningful discovery within the 30-day timetable the Court’s July 12 Order imposed, Defendants nevertheless proposed to provide additional substantive responses to the two interrogatories,⁷ and Plaintiffs initially indicated acceptance of that offer, while stressing their untenable demand that any further response be based on new searches of ESI.

Plaintiffs, however, came back with another demand. They asserted that Defendants must supplement their responses to various Interrogatories served on Dr. Fauci (Common Interrogatory Nos. 1-5), purportedly based on Facebook’s designation of Dr. Fauci as one official who communicated with the platform. But the fact that Dr. Fauci communicated with Facebook is not

⁷ In the same agreement, Plaintiffs’ accepted Defendants’ offer to supplement two interrogatories as to DHS, discussed below.

new (indeed, it is prominently alleged in the Complaint), and cannot warrant supplementation of existing interrogatory responses, let alone sustain a demand for any additional interrogatories. Defendants have already produced email communications between Dr. Fauci and social media companies. Indeed, at Plaintiffs' request during meet-and-confer sessions, Defendants also agreed to produce—and did produce on Friday, August 26—additional emails between Dr. Fauci and Mark Zuckerberg that were in their custody and control but that were not responsive to Plaintiffs' discovery requests. Facebook's confirmation that it communicated with Dr. Fauci simply repeats a fact already known to Plaintiffs before they filed this action, and cannot support requiring supplemental or additional interrogatory responses here.

Requested Relief: At any rate, should the Court find any remaining dispute, it should adopt Defendants' reasonable compromise proposal, under which Defendants would provide, by three weeks from today, as to Dr. Fauci, supplemental responses on Additional Interrogatory Nos. 5 and 6, and on Common Interrogatories Nos. 2, 3, and 4. That task omits Common Interrogatory Nos. 1 and 5: Defendants are responding to Common 6 in lieu of Common No. 1 as explained above, and Common No. 5 seeks the results of searches of documents also produced so no supplementation is proper. Again, the Court should clarify that the further response as to Dr. Fauci is permitted to be made on the existing documents Defendants produced, not on new ESI.

C. The Court should reject Plaintiffs' expansive requests for supplemental responses from DHS.

Subject to the meet-and-confer, Defendants have also offered to supplement responses to two interrogatories as to DHS: Additional Interrogatory No. 11 (DHS No. 9), and Additional Interrogatory No. 12 (DHS No. 13). Additional Interrogatory No. 11, concerning DHS's alleged contacts with unspecified "tech companies," reads: "Identify all 'the tech companies' with which DHS is 'working together' to 'prevent harm from occurring,' as Secretary Mayorkas stated on

August 2, 2021, as discussed in Paragraph 207-208 of the Complaint, including the nature of the work and all Communication(s) relating to such work.” DHS objected on the grounds, among others, that Plaintiffs had not specified the “tech companies” about which they inquired, and provided a narrative response explaining that the nature of the work that the agency performs includes “respond[ing] to Misinformation that poses a threat to the homeland.”

Additional Interrogatory No. 12, concerning communications with platforms about misinformation not only by the whole of DHS, but by the whole of the Federal Government, reads: “Identify every federal agency, group, sub-group, department, component, division, sub-division, officer, official, employee, agent, or other person or entity within the federal government, both within and without DHS, that communicates or has communicated with any Social-Media Platform regarding Misinformation and/or Content Modulation, including but not limited to any person or entity whose activity is or was to be subject to oversight by the Disinformation Governance Board, including the nature of their coordination with the Social-Media Platform(s).” DHS objected on the grounds, among others, that the interrogatory called on DHS to obtain information not reasonably available to it within the compressed expedited discovery period, about agencies whose alleged conduct is not challenged in either of Plaintiffs’ pleadings and which is not within DHS’s custody and control.

After Plaintiffs contended that the initial responses to those two interrogatories were not “meaningful,” DHS nevertheless offered to provide a further response after the filing of this Joint Statement, but in signaling their approval of that offer, Plaintiffs stressed their demand that any further responses be based on new ESI searches—a condition Defendants cannot meet given the severe time constraints of the expedited discovery process, and because it would be disproportional to the needs of Plaintiffs’ preliminary injunction application. Again, Defendants are willing to

supplement their responses to these interrogatories within three weeks of the filing of this Joint Statement, so long as it is not subject to the requirement to do new burdensome ESI searches.

Requested Relief: Accordingly, the Court should resolve the dispute on this point, should one remain, by adopting Defendants' reasonable compromise proposal, under which, without searching for any new ESI, Defendants will supplement Additional 11 and Additional 12 for DHS by three weeks from today's joint statement filing.

D. Requiring HHS to conduct a search for responsive material through the entire agency would exceed the scope of the allegations of the Complaint and preliminary injunction motion and would cause disproportionate burden.

Plaintiffs also challenge the adequacy of HHS's identification of custodians likely to have relevant information, and they request that Defendants immediately conduct a search of all of HHS—an agency of 80,000 employees—for communications with social media platforms. This request remains untenable. It proceeds from the faulty premise that Plaintiffs are entitled to discovery from every HHS employee—regardless of whether the discovery sought would be “necessary” to resolve their preliminary injunction motion, *BKGTH Prods., LLC*, 2013 WL 5507297, at *5, let alone whether it is “proportional to the needs of the case,” or would impose undue “burden or expense” on Defendants, *see* Rule 26(b)(1). Plaintiffs' request would be unreasonable in an ordinary discovery context. *See Coleman v. Am. Red Cross*, 23 F.3d 1091, 1098 (6th Cir. 1994) (upholding district court order denying motion to compel request to search every file in Red Cross National Headquarters “for any documents that might be of any relevance to the matter in the case” because the request was “overly burdensome,” particularly when thousands of pages of documents productions, interrogatory responses, and depositions provided other ways of obtaining relevant information). It is all the more unreasonable in the expedited discovery context presented here.

HHS’s search for relevant custodians was reasonable and tailored to the discovery authorized by the Court. The Court ordered expedited discovery “targeted to the specific allegations of Plaintiff States’ Complaint.” Order at 12. In searching for responsive information, the agencies identified custodians in the relevant components based on their understanding of each individual’s role at the agency and their involvement in the types of communications alleged in the Complaint and sought through Plaintiffs’ discovery requests. *See* Rule 33(b)(1)(A) (stating that interrogatories must be answered “by the party to whom they are directed”); Rule 34(2)(A) (providing that “[t]he party to whom the request is directed must respond” or object); *see also In re Epipen Mktg., Sales Pracs. & Antitrust Litig.*, MDL No. 2785, 2018 WL 1440923, at *2 (D. Kan. Mar. 15, 2018) (“[T]he party responding to discovery requests is typically in the best position to know and identify those individuals within its organization likely to have information relevant to the case.”). After all, the Complaint is what “give[s] the defendant fair notice of what ... the claim is and the grounds upon which it rests.” *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 555 (2007). The notice-pleading rule “does not unlock the doors of discovery for a plaintiff armed with nothing more than conclusions.” *Ashcroft v. Iqbal*, 556 U.S. 662, 678-79 (2009).

The agency’s efforts, moreover, must be understood in the context of the expedited discovery process here. To respond to Plaintiffs’ requests within the time allotted, the agencies were required to identify custodians within a matter of *days*. The agencies thus reasonably focused their efforts on identifying the custodians who were most likely to have responsive information. *See June Med. Servs., LLC v. Gee*, No. CV 16-444-BAJ-RLB, 2018 WL 5269813, at *2 (M.D. La. Oct. 23, 2018) (finding that a search of 23 custodians after an inquiry into those who were most likely to have discoverable information was reasonable). And because Plaintiffs specifically identified and served discovery on three HHS components—the Centers for Disease Control

(CDC), the National Institute of Allergy and Infectious Diseases (NIAID), the Office of the Surgeon General (OSG)—it is unsurprising that the officials identified as most likely to have responsive information would be employed by those components.

Moreover, in order to respond to Plaintiffs' discovery requests within the condensed time period allotted, after identifying custodians most likely to have responsive documents, HHS immediately began collecting, searching, and producing their responsive documents—using all of the expansive search terms Plaintiffs provided—within the month-long period authorized by the Court. HHS ultimately produced thousands of email communications in the identified custodians' custody and control. And in response to Plaintiffs' interrogatories, HHS identified the designated custodians by name and title, noting that they had been identified after “a reasonable inquiry under the circumstances of abbreviated, expedited discovery.”

Given these extensive efforts, Plaintiffs err in contending that HHS's search for custodians most likely to have responsive documents was inadequate because the very components named in the Complaint and discovery requests were the components HHS identified as having responsive information. First, Plaintiffs' demand that HHS search the ESI of officials from every HHS component would collapse the distinction between various components and operating divisions that comprise the agency. HHS includes eleven operating components—including the Substance Abuse and Mental Health Services Administration, the Agency for Toxic Substances and Disease Registry, and the Food and Drug Administration—and employs approximately 80,000 individuals around the world. <https://www.hhs.gov/careers/working-hhs/agencies> (last accessed Aug. 30, 2022).⁸ Plaintiffs apparently would have HHS conduct extensive searches of each of these

⁸ DHS likewise includes numerous components and employs approximately 240,000 individuals. *See About DHS*, <https://www.dhs.gov/about-dhs> (last accessed Aug. 30, 2022).

components for potentially responsive records, even if the component’s activities are nowhere mentioned in the Complaint underlying the preliminary injunction application. But under Rule 26(b)(1), it would be disproportional and unduly burdensome for HHS, in identifying the “information available to” the agency for purposes of answering an interrogatory, *see* Rule 33(b)(1)(B), or producing documents, *see* Rule 34, to be compelled to answer as to the activities of officials from every corner of the agency, even when their conduct is not alleged to be at issue in the Complaint. Even if Plaintiffs’ request that Defendants search the entirety of HHS were compatible with Rules 26, 33, and 34—and it is not, for the reasons specified in Defendants’ objections and responses—Defendants could not feasibly respond to such a request without conducting an inquiry into agency activities that could not be completed within the highly compressed timetable for expedited discovery as the Court authorized it.

Indeed, Plaintiffs do not dispute that the additional searches they demand would impose significant burdens on HHS that would be incompatible with the expedited discovery permitted by the Court. Instead, in the parties’ meet and confer sessions, they baselessly accused HHS of intentionally concealing relevant and responsive information based on what Plaintiffs describe as a “list” of individuals from Meta of federal officials who have communicated with the company “about content modulation on a specified list of topics.”⁹ According to Plaintiffs, that “list” identifies additional individuals at HHS who have communicated with social media companies, who were not identified as custodians in HHS’s interrogatory responses. But Plaintiffs offer no details about the nature or frequency of the communications those officials are said to have had with the platform. The platform apparently did not indicate whether those individuals

⁹ Defendants have not seen Plaintiffs’ request to Meta for this list or Meta’s description of the types of communications the named officials are said to have had with the company and are only going by Plaintiffs’ characterization of the list in email communications.

communicated with its officials about misinformation, or even whether they communicated with the platform on more than one occasion. Plaintiffs' bald assertion that Defendants have failed to conduct adequate searches, based solely on this list of names apparently devoid of any specificity, lacks any factual basis. Moreover, Plaintiffs' accusation that Defendants have actively *concealed* responsive information is not only lacking any factual support, is contradicted by the responses Defendants have already provided: Defendants' document productions—again, of roughly 15,000 pages of email communications—contain some of the very names Plaintiffs wrongly assert Defendants have attempted to hide. Nor would the agency, or any Defendant, have any incentive to conceal information: the communications Plaintiffs challenge here are not unlawful or remarkable.

Requested Relief: Notwithstanding the foregoing, the Court should resolve the dispute about HHS, should one remain, by adopting Defendants' reasonable compromise proposal, under which, without searching for any new ESI, Defendants will supplement, by three weeks from today, the responses to Common Interrogatories Nos. 2 through 4, for HHS (where HHS would also respond to Common Interrogatory 6, as outlined above), based on a reasonable inquiry to HHS's Immediate Office of the Secretary ("IOS"). In that regard, because Common Interrogatory 5 seeks the results of searches of documents also produced, no supplementation is proper from HHS as to Common Interrogatory 5.

E. Plaintiffs are not entitled to discovery from the White House.

Plaintiffs have served wide-ranging discovery requests on two advisors to the President: (1) Karine Jean-Pierre in her official capacity as White House Press Secretary; and (2) Dr. Anthony Fauci in his official capacity as Chief Medical Advisor to the President. The discovery served on these White House officials is broad in scope, ranging from asking White House officials to answer

questions on behalf of the entire federal government to seeking records of internal communications that implicate serious separation of powers concerns. *See, e.g.*, Common Interrogatory No. 2;¹⁰ Request for Production to Ms. Jean-Pierre No. 9.¹¹

Plaintiffs have done so without first exhausting other avenues for related information. Indeed, the agency Defendants have produced thousands of documents, including documents revealing the very communications Plaintiffs also seek directly from the White House. And Plaintiffs have sought, and in some instances already obtained, information from third-party social media companies that Plaintiffs assert were communicating with the federal government, including the White House, about misinformation. Rather than exhausting other avenues first, Plaintiffs sought discovery from these White House officials in the first instance. Such an approach unnecessarily embroils this Court in a separation of powers dispute that may otherwise be avoided.

That conclusion is underscored by the fact that Plaintiffs seek such information immediately at the outset of this case, rather than in the normal course of civil discovery. The current procedural posture only heightens the concerns identified by the Supreme Court, as discussed below. Here, Plaintiffs seek White House records not only before they have evaluated information received from other parties, but before this Court has even decided a motion to dismiss. This Court should reject Plaintiffs' efforts to seek discovery from the White House at this stage of the litigation, in which Plaintiffs argued they needed limited and targeted discovery to

¹⁰ Plaintiffs asked all Defendants, including Ms. Jean-Pierre and Dr. Fauci, to “[i]dentify every officer, official, employee, staff member, personnel, contractor, or agent of’ recipient Defendant ‘or any other federal official or agency who has communicated or is communicating with any Social-Media Platform regarding Content Modulation and/or Misinformation.” (emphasis added).

¹¹ Plaintiffs requested the White House Office of the Press Secretary through Ms. Jean-Pierre to “[p]roduce all Documents and Communications *relating to any* ‘government experts’ who have ‘partnered with’ Facebook or any Social-Media Platform to address Misinformation and/or Content Modulation.” (emphasis added).

inform the resolution of their motion for a preliminary injunction, and instead proceed to consideration of that motion as informed by the thousands of documents the various Defendants have already produced.

Because seeking such wide-ranging discovery from the White House implicates serious separation of powers concerns, courts are extremely cautious before allowing such discovery, especially when other avenues for related information have been not yet been exhausted. *See generally Cheney v. U.S. Dist. Ct. for D.C.*, 542 U.S. 367 (2004); *see also* Order, *Centro Presente v. Biden*, No. 1:18-cv-10340 (D. Mass. May 15, 2019) (Dkt. No. 89) (requiring plaintiff to exhaust all discovery on other defendants before considering whether there was “continuing need for discovery sought from the White House”); *Karnoski v. Trump*, 926 F.3d 1180, 1207 (9th Cir. 2019) (vacating “district court’s discovery orders because the district court did not fulfill its obligation ‘to explore other avenues, short of forcing the Executive to invoke privilege’” (quoting *Cheney*, 542 U.S. at 390)). The burden imposed on the White House by discovery orders is an “important factor” to be considered by courts, due to the special deference and “the high respect that is owed to the office of the Chief Executive[.]” *Cheney*, 542 U.S. at 385 (citation omitted).

Courts have routinely recognized the weighty separation-of-powers concerns triggered by discovery directed to the White House. That is why “courts must narrow overly broad and intrusive discovery requests directed at the highest levels of the Executive Branch, lest ‘vexatious litigation . . . distract [the Executive Branch] from the energetic performance of its constitutional duties.’” *Vidal v. Duke*, No. 16-CV-4756, 2017 WL 8773110, at *4 (E.D.N.Y. Oct. 17, 2017) (alterations in original) (citing *Cheney*, 542 U.S. at 382) (finding that a magistrate’s order “requiring the White House to identify and assert privilege with respect to specific documents or risk waiving privilege over those documents . . . potentially raises constitutional concerns akin to those at issue in

Cheney”); Order at 4, *In re Kirstjen M. Nielsen, Secretary of Homeland Security*, No. 17-3345 (2d. Cir. Dec. 27, 2017) (Dkt. No. 171) (explaining that a discovery order covering White House documents would “creat[e] possible separation of powers issues”). Plaintiffs must demonstrate that the requests are limited to essential information that cannot otherwise be obtained. *See Karnoski*, 926 F.3d at 1205; *Lardner v. U.S. Dep’t of Just.*, No. 03-0180, 2005 WL 758267, at *9 (D.D.C. Mar. 31, 2005) (citing *Cheney* for the proposition that “a court must screen a request for presidential documents to ensure that the discovery is essential to the proceedings”).

In measuring the burden imposed, the Court must consider the extensive discovery—including roughly 15,000 pages of documents—already produced by the agency Defendants. Against that background, there is no warrant for steering this case into conflict with the separation of powers by allowing Plaintiffs to pursue expedited discovery from the White House. At most, discovery implicating these weighty constitutional concerns should be deferred to a later stage of this litigation and allowed then only if it is necessary to resolution of the case. This Court should therefore deny Plaintiffs’ request to compel expedited discovery on the White House.

1. *Discovery requests on the White House Office of the Press Secretary.*

Plaintiffs’ discovery requests on the White House Office of the Press Secretary¹² are facially unreasonable. Contrary to the principles discussed above, Plaintiffs have not exhausted other avenues before seeking these communications from the White House Office of the Press Secretary. Again, the burden imposed on the White House by discovery orders is an “important factor” to be considered by courts, due to the special deference and “the high respect that is owed

¹² The Office of the Press Secretary is separate from the White House Communications Office. Plaintiffs have not served any discovery on the Communications Office, and the Director of the Communications Office is not named as a defendant in the original Complaint on which the Court-authorized discovery is based.

to the office of the Chief Executive[.]” *Cheney*, 542 U.S. at 385 (citation omitted). Further, Rule 26(b) of the Federal Rules of Civil Procedure directs a district court to limit the scope of discovery if “the discovery sought is unreasonably cumulative or duplicative, or can be obtained from some other source that is more convenient, less burdensome, or less expensive[.]” Fed. R. Civ. P. 26(b)(2)(C)(i). Although there is often a presumption in favor of disclosure of non-privileged material, “[i]n some circumstances, . . . the requesting party should be required to assume a heavy burden of persuasion before any discovery is allowed.” *See Cheney*, 542 U.S. at 392 (Stevens, concurring); *see also* Order at 9 (noting that “[e]xpedited discovery is not the norm” and that it must be “reasonable[] . . . in light of all the surrounding circumstances”).

Plaintiffs cannot meet this burden. Again, they have not exhausted other avenues for such information. Plaintiffs did not even evaluate the material that they obtained from other Defendants prior to serving discovery on the White House. Those Defendants produced thousands of records, including records of communications that involved White House personnel. But Plaintiffs do not identify any personnel in the White House Office of the Press Secretary as participants in or recipients of those communications, again suggesting that such discovery is altogether unwarranted.

To the extent Plaintiffs are seeking external communications with social media companies, it is Defendants’ understanding that Plaintiffs served subpoenas on social media companies seeking the very same material. Although it possible that the social media companies may object, in full or in part, to the subpoenas, it is Defendants’ understanding that at least some social media companies have responded by identifying the individuals they communicated with across the government, including at the White House. Notably, based on Plaintiffs’ own representations during the meet-and-confer about the companies’ responses, it does not appear that the social

media companies have identified anyone from the White House Office of the Press Secretary, where this discovery was served. Regardless, the scope of those responses by the third-party social media companies should first be resolved before burdens are imposed on the White House.

A party should not be allowed to engage in a fishing expedition for communications of a senior advisor to the White House, such as the White House Press Secretary, based on such a scarce record. The reference involving the Office of the Press Secretary to which Plaintiffs point to suggest the involvement of the Press Secretary or her Office in the conduct alleged in the Complaint are statements made by the former Press Secretary, Jennifer Psaki. But those statements do not suggest that anyone from the Office of the Press Secretary communicated with social media companies; they suggest that *others* did. And Defendants have produced thousands of records of such communications by officials throughout the government; there is no need for Plaintiffs to rummage through the email and other traffic from the Office of the Press Secretary. The information provided by the other Defendants in response to both document productions and interrogatories substantially similar to those served on the White House Press Secretary should be more than sufficient for the current stage of the litigation; *i.e.*, limited discovery in anticipation of a motion for preliminary injunction.

Moreover, Plaintiffs' requests on the White House are not cabined or narrow; to the contrary, they also seek communications internal within the government. As an initial matter, Defendants have objected to all of Plaintiffs' discovery requests that seek internal governmental communications as not proportional to the needs of the case, because they would have required an extensive search of internal records that was not possible within the expedited period provided for current discovery and would be unnecessary in light of the thousands of external communications

Defendants have agreed to produce from various Defendants. Thus, on this basis alone the Court should reject any effort by Plaintiffs to compel the White House Office of the Press Secretary.

The burdens on the White House are further magnified for discovery seeking internal White House communications. *See Cheney*, 542 U.S. at 390 (rejecting the requirement that such privileges must be initially logged given the burdens inherent in doing so in such a situation). Unlike other Government officials, the President maintains unique “constitutional responsibilities and status” *Nixon v. Fitzgerald*, 457 U.S. 731, 753 (1982). Rather than put the White House to the substantial and constitutionally intrusive burden of searching for responsive documents and invoking privilege over each document to which a privilege might apply, under *Cheney*, the district court must hold the plaintiff to a heightened standard of relevance and need. As the Supreme Court explained, “precedents provide no support for the . . . requirement that the Executive Branch bear the burden of invoking executive privilege with sufficient specificity and of making particularized objections. Indeed, those precedents suggest just the opposite.” *Cheney*, 542 U.S. at 371.

In the end, Plaintiffs are not entitled to such far-ranging discovery on the White House Office of the Press Secretary, particularly at this stage at this litigation. *See Karnoski*, 926 F.3d at 1205 (finding that plaintiffs must meet a “heightened standard” where they “must make a preliminary showing of need demonstrating ‘that the evidence sought [is] directly relevant to issues that are expected to be central to the trial’ and ‘is not available with due diligence elsewhere.’”) (quoting *In re Sealed Case*, 121 F.3d 729, 754 (D.C. Cir. 1997)). As explained above, even interrogatories and document production requests that seek external communications from the White House Office of the Press Secretary impose improper burdens—burdens that are heightened to the extent the Plaintiffs seek to expand their requests beyond that Office (the only one that they actually served). And in no event should this Court permit Plaintiffs’ even more burdensome

requests for internal documents that implicate concerns about privilege and the constitutional separation of powers. *See, e.g., Cheney*, 542 U.S. at 390. Again, Plaintiffs have not exhausted all available alternative sources and demonstrated that the material they seek from the White House Office of the Press Secretary is essential and not substantially available through other avenues.

2. *Discovery served on Dr. Fauci in his capacity as Chief Medical Advisor to the President.*

Defendants have already averred to Plaintiffs that “they are unaware of any separate White House e-mail account belonging to Dr. Fauci” and “that, to their understanding, Dr. Fauci’s direct reports and staff are affiliated with the National Institute of Allergy and Infectious Diseases.” Further, Defendants have searched and provided responsive documents from Dr. Fauci and the NIAID. Likewise, Defendants have provided information in response to interrogatories directed at Dr. Fauci and the NIAID. Accordingly, the dispute concerning Dr. Fauci is whether anything more is required beyond what Defendants have already done. But to the extent Dr. Fauci has any other information in his capacity advising the President, the production of such information would implicate core constitutional concerns outlined above, recognized by *Cheney* and its progeny. Again, the current phase of discovery is limited to development of a record necessary to support Plaintiffs’ preliminary injunction motion. Given the breadth of information of Defendants have already produced concerning Dr. Fauci and the weighty separation of powers concerns that would be implicated if he were required to respond to discovery requests in his capacity as Chief Medical Advisor to the President, this Court should not allow Plaintiffs to obtain discovery from him in that role, at least at this stage. That is especially true when Plaintiffs, again, did not explore all other avenues before seeking such discovery.

Accordingly, Defendants ask this Court to consider their responses for Dr. Fauci in his capacity as Director of NIAID sufficient for the present purposes and reject Plaintiffs' invitation to intrude into the constitutional issues delineated by *Cheney* and its progeny.

3. *This Court should stay any order compelling discovery against the White House.*

Finally, to the extent that this Court agrees with Plaintiffs and orders discovery on the White House, in any form, Defendants respectfully request that this Court stay its order for 30 days to give the Solicitor General sufficient time to consider the government's appellate options prior to complying with the discovery requests. Such a stay was contemplated by the Supreme Court in *Cheney*, which explained that a dispute over White House discovery is distinct "from the category of ordinary discovery orders where interlocutory appellate review is unavailable, through mandamus or otherwise." *See Cheney*, 542 U.S. at 381-82. And should Defendants seek further review, Defendants respectfully ask that this Court continue its stay of its order pending completion of such appellate proceedings. *See Order, In re Donald J. Trump*, No. 18-72159 (9th Cir. Sept. 17, 2018) (Dkt. No. 36) (staying district court discovery order pending Ninth Circuit's consideration of the Government's petition for a writ of mandamus concerning White House discovery); *see also Karnoski*, 926 F.3d at 1204-06 (vacating that discovery order). This Court should protect the White House from responding to such discovery until Defendants can fully consider their appellate options and, if the Solicitor General determines in favor of seeking appellate review, until that review is complete.

III. The Court should reject Plaintiffs' attempts to re-open preliminary-injunction-related discovery by making new discovery requests for the first time during the parties' meet and confer discussions.

Plaintiffs ask the Court to compel Defendants to respond to a number of new discovery requests directed to agencies and officials that were not defendants when the Court authorized

expedited discovery (and many of which are not even defendants now). Those discovery requests are improper.

First, the Court did not authorize Plaintiffs' new discovery requests. In the Court's expedited discovery order, it allowed the "Plaintiff States [to] serve interrogatories and document requests upon *Government Defendants*," which the Court defined as those who were Defendants *at the time of the Court's order*. Order at 1 n.1, 13 (emphasis added).¹³ Additionally, the Court ordered Plaintiffs to serve their discovery requests "[w]ithin five business days after" the Court's July 12, 2022 expedited discovery order (*i.e.*, by July 19, 2022). *Id.* at 13. Here, Plaintiffs' new discovery requests are directed to agencies and officials who were not "Government Defendants" when the Court authorized discovery, and Plaintiffs did not serve their requests by July 19, 2022. Thus, the Court did not authorize Plaintiffs' new discovery requests, and their requests therefore seek impermissible expedited discovery under Federal Rule of Civil Procedure 26.

To be clear, this argument applies to Plaintiffs' new discovery requests on White House officials outside of the Office of the Press Secretary. Plaintiffs initially served discovery only on the White House *Press Secretary*. They did not serve discovery on the White House as a whole. Thus, their new discovery requests on White House officials outside of the Office of the Press Secretary were not served by the July 19, 2022, deadline set by the Court. And as explained above, Defendants object to White House discovery, particularly at this stage of the litigation, but, regardless, these particular requests were not properly served.

¹³ "Government Defendants consist of Joseph R. Biden, Jr., Jennifer Rene Psaki, Vivek H. Murthy, Xavier Becerra, Department of Health and Human Services, Anthony Fauci, National Institute of Allergy and Infectious Diseases, Centers for Disease Control and Prevention, Alejandro Mayorkas, Department of Homeland Security, Jen Easterly, Cybersecurity and Infrastructure Security Agency, and Nina Jankowicz." Order at 1 n.1.

Second, Plaintiffs' new discovery requests are unjustified because they have failed to establish that they have standing to sue, and seek relief against, any of the new agencies and officials from whom they seek discovery. As explained in Defendants' opposition to Plaintiffs' expedited discovery motion, a court must first assess whether Plaintiffs have standing to sue prior to allowing the litigation against the parties in question to move forward. *See Haverkamp v. Linthicum*, 6 F.4th 662, 668 (5th Cir. 2021); *Steel Co.*, 523 U.S. at 94–95; Defs.' Disc. Resp., ECF No. 26, at 8-12. Here, Plaintiffs make no attempt to show that any have suffered any injury as a result of any comments made by the agencies and officials from whom they now seek new discovery. Thus, the Court can deny these belated expedited discovery requests for this reason alone.

Third, Plaintiffs' new discovery requests are incompatible with the compressed discovery schedule Plaintiffs demanded and the Court set. Plaintiffs argued that they needed expedited discovery because they needed a quick decision on the preliminary injunction motion. *See* Mot. at 3 n.1 (the "issues" raised in the preliminary injunction motion are allegedly "time-sensitive and urgent"). The Court thus ordered an expedited discovery schedule that gave Defendants only a few weeks to provide discovery responses. *See* Order at 13. This schedule did not contemplate a process whereby Plaintiffs could serve new and additional discovery requests on a rolling basis. *See id.* (allowing Plaintiffs to serve discovery "[w]ithin five business days after" the Court's order). Plaintiffs' new discovery requests, if allowed, would require a drastic change to the nature and schedule of this discovery process. The Court would have to institute a new schedule whereby Plaintiffs could serve their new discovery requests,¹⁴ and Defendants would be given a meaningful

¹⁴ Plaintiffs thus far have not properly served Defendants with the new discovery requests consistent with Federal Rule of Civil Procedure 34. Plaintiffs simply described their new discovery request in informal emails. Further, Plaintiffs' demand for discovery responses encompasses

amount of time—at a minimum, another 30 days—to respond to those discovery requests. Plaintiffs, however, have objected to any material extension in the discovery process.

Fourth, Plaintiffs’ new discovery requests are unnecessary for them to litigate their preliminary injunction motion. That motion seeks relief against those who were Defendants when the motion was filed, and Plaintiffs do not even argue that they need any additional information or evidence to litigate the motion against those parties. Thus, Plaintiffs are not entitled to any further expedited discovery. *See BKGTH Prods., LLC*, 2013 WL 5507297, at *5 (“A party seeking expedited discovery must narrowly tailor their requests in scope to the *necessary* information they seek.” (emphasis added)). If Plaintiffs believe they can litigate their motion now, and if they believe they need a prompt resolution of that motion, then the Court need not, and should not, authorize any further, time-consuming discovery.

Fifth, the discovery process Plaintiffs now request—where they submit new discovery requests seriatim as they learn new information—would be inefficient. Plaintiffs simply note that various other federal government agencies and officials may have been communicating with social media companies about misinformation, and thus they want discovery over whether those communications were occurring. But Plaintiffs are assuming those communications would be improper. Rather than allow Plaintiffs to conduct a multi-stage investigation into several components of the federal government, the parties should be directed to first litigate the pending preliminary injunction motion and secure a decision over whether the communications at issue amount to a First Amendment violation. A legal determination on that issue could illuminate whether further discovery into other federal agencies and officials relating to those types of

federal agencies and officials who are not parties and thus Plaintiffs would have to comply with any requirement to seek information from non-parties. *See generally U.S. ex rel. Touhy v. Ragen*, 340 U.S. 462 (1951).

communications would even be useful. If the Court agrees with Defendants that those communications are unproblematic, then Plaintiffs' new, requested discovery would be unnecessary. And even if the Court disagrees with Defendants, the parties can then secure a final determination on that question by litigating it through the appellate process—all before the federal government absorbs enormous discovery-related burdens as a result of Plaintiffs' new, sprawling discovery requests.

Plaintiffs rely on a number of arguments to justify their new requests. None has merit. First, Plaintiffs assert that they need discovery over the officials purportedly engaging in the communications at issue so that they can properly frame their request for relief. But Plaintiffs' preliminary injunction motion seeks relief against the agencies and officials who were defendants when that motion was filed, and it is unclear how Plaintiffs are unable to frame their request for relief against *those* defendants unless they obtain discovery into *other* agencies and officials. Regardless, if the Court finds that injunctive relief is proper, the Court can simply issue relief against the agency at issue. An injunction need not identify—and thus Plaintiffs do not need discovery over—each and every person who has engaged in allegedly improper communications.

Plaintiffs also argue that they could not serve their new discovery requests earlier because new information purportedly came to light only recently. As an initial matter, Plaintiffs fail to demonstrate that they could not have uncovered this information earlier. For example, Plaintiffs seek new discovery from the FBI based on certain recent comments by Mark Zuckerberg concerning communications Facebook had with the FBI. But Mark Zuckerberg made virtually identical comments nearly two years ago, at an October 28, 2020 Senate hearing. There, he stated: “[W]e’ve been able to build partnerships across the industry,” including “with law enforcement and the intelligence community, to be able to share signals” and “one of the threats that the FBI

has alerted our companies and the public to, was the possibility of a hack and leak operation in the days or weeks leading up to this election.” <https://www.rev.com/blog/transcripts/tech-ceos-senate-testimony-transcript-october-28> (last accessed Aug. 30, 2022). Thus, this information has been in the public domain for years, as Plaintiffs’ own Complaint acknowledges. *See also* Compl. ¶ 182 (relying on NBC News article to assert that platforms stated they met with, among other agencies, “the FBI’s foreign influence task force”).

In any event, even if Plaintiffs could not have uncovered the information at issue earlier, their new requests are nonetheless still incompatible with the discovery schedule currently in place. *See supra*. Thus, again, if Plaintiffs want the Court to expand the scope of authorized discovery, they cannot object to a commensurate extension of the discovery schedule.

Plaintiffs have also indicated that they intend to move for leave to amend their Complaint and add as Defendants the new agencies and officials from whom they now seek discovery. As an initial matter, Defendants expect to oppose Plaintiffs’ motion for leave to amend their Complaint, including on futility grounds. Regardless, amending their Complaint to incorporate new parties would not address all of the deficiencies in their new discovery requests. Plaintiffs would still have to move for expedited discovery against those parties, and Defendants would oppose that. Further, as explained above, any new discovery would be inconsistent with Plaintiffs’ representation that they need a prompt decision on the preliminary injunction motion.

Accordingly, the Court should not compel Defendants to respond to Plaintiffs’ belated, unjustified discovery requests. Should the Court authorize these new discovery requests, Defendants reiterate their request that the Court provide sufficient time for the Solicitor General to consider options for appellate review.

IV. If the Court is inclined to authorize any additional discovery, and extend the discovery period, the Court should permit Defendants to take discovery from the Plaintiffs.

Defendants have thus far expended significant resources and produced thousands of pages of documents in what was billed as a narrow, targeted discovery process. If Defendants are required to provide additional discovery, and expend additional resources, Plaintiffs should not be spared from those burdens, especially since they too may have documents that are highly relevant to this litigation. In any order authorizing additional discovery, the Court should thus allow Defendants to take discovery from Plaintiffs on a number of issues. First, Defendants should be permitted to take discovery from Plaintiffs on any communications they may have had with social media companies about misinformation. Public reports suggest that at least one official in Missouri may have engaged in these communications. See <https://www.news-leader.com/story/news/politics/2021/09/14/missouris-health-director-plans-state-covid-response-fight-misinformation-masks-vaccination/8332397002/> (last accessed Aug. 30, 2022) (the Director of the Missouri Department of Health and Senior Services claimed he wanted to “improve [] messaging . . . for social media,” and “battl[e] misinformation”). If the Plaintiff States have alerted social media companies of misinformation on their platforms, that would further confirm that those types of communications are routine and lawful. Additionally, Defendants should also be permitted to serve document requests and/or interrogatories relating to Plaintiffs’ standing theories. Responses to those discovery requests would be relevant to Plaintiffs’ allegations concerning actions that social media companies may have taken directly against them or against their residents. This discovery would shed light on when those actions occurred, how often they occurred, and the context in which they occurred—information that would be relevant to whether those actions could be attributed to any Defendant. The Court should subject these discovery

requests to the same schedule that would be applied to any new discovery requests authorized against Defendants.



**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA**

The State of Missouri and the State of
Louisiana,

Plaintiffs,

v.

President Joseph R. Biden, Jr., in his official
capacity as President of the United States of
America,

et. al.,

Defendants.

Civil Action No. 22-cv-1213

DEFENDANTS' PROPOSED ORDER

Having considered the Parties' Joint Statement concerning the expedited discovery requests authorized by the Court, ECF No. 34, **IT IS ORDERED** that:

1. Other than the supplemental interrogatory responses Defendants have agreed to provide Plaintiffs by September 21, 2022, all further relief Plaintiffs seek in the Parties' Joint Statement is hereby **DENIED**.
2. The Parties shall otherwise follow the schedule set out in this Court's Order, ECF No. 34.

MONROE, LOUISIANA, this ____ day of September 2022.

Terry A. Doughty
United States District Judge

Dated: August 31, 2022

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CERTIFICATE OF SERVICE

I hereby certify that, on August 31, 2022, I caused a true and correct copy of the foregoing to be filed by the Court's electronic filing system, to be served by operation of the Court's electronic filing system on counsel for all parties who have entered in the case.

/s/ D. John Sauer

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA**

**The State of Missouri and the State of
Louisiana,**

Plaintiffs,

v.

**President Joseph R. Biden, Jr., in his
official capacity as President of the United
States of America, et. al.,**

Defendants.

Civil Action No. 22-cv-1213

**DEFENDANTS' COMBINED OBJECTIONS AND RESPONSES TO
PLAINTIFFS' FIRST SET OF EXPEDITED
PRELIMINARY-INJUNCTION RELATED INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33 and the Local Rules of the U.S. District Court for the Western District of Louisiana, Defendants, by and through counsel, provide the following combined objections and responses to Plaintiffs' First Set of Expedited Preliminary-Injunction Related Interrogatories ("Plaintiffs' First PI Interrogatories" or "Interrogatories") served on July 18, 2022 on the following Defendants: Dr. Anthony Fauci; Centers for Disease Control and Prevention ("CDC"); Surgeon General Vivek H. Murthy; U.S. Department of Health and Human Services ("HHS"); National Institute of Allergy and Infectious Diseases ("NIAID"); U.S. Department of Homeland Security ("DHS"); Cybersecurity and Infrastructure Security Agency ("CISA"); Jen Easterly, Director of CISA; Nina Jankowicz (former Executive Director of the DHS Disinformation Governance Board); and White House Press Secretary Karine Jean-Pierre (collectively, "Defendants"). Consistent with the agreement of the parties, Defendants have combined the objections and responses to address duplication of certain interrogatories among

Defendants but have addressed each interrogatory for each Defendant to which each interrogatory is directed.

Defendants' combined objections and responses are based on information known to Defendants at this time and are made without prejudice to additional objections should Defendants subsequently identify additional grounds for objection. The objections have been formulated in contemplation of Federal Rule of Civil Procedure 26(b)(1), which generally permits discovery of matters not privileged that may be relevant to the claims or defenses in a civil action. In presenting their objections, Defendants do not waive any further objection in pretrial motions practice or at trial to the admissibility of evidence on the grounds of relevance, materiality, privilege, competency, or any other appropriate ground.

OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

1. Defendants object to the definitions of "Content Modulation," and the related term "Misinformation," including to the extent that Plaintiffs' definition of "Content Modulation" covers actions by Social Media Companies *beyond* those taken against content containing Misinformation and against users posting content containing Misinformation (such as actions taken as to any post on "efficacy of COVID-19 restrictions" or on "security of voting by mail"). For purposes of these Responses and Objections, Defendants generally define "Misinformation" in a manner consistent with Plaintiffs' definition of that term: "any form of speech . . . considered to be potentially or actually incorrect, mistaken, false, misleading, lacking proper context, disfavored, having the tendency to deceive or mislead . . . including but not limited to any content or speech considered by any federal official or employee or Social-Media Platform to be 'misinformation,' 'disinformation,' 'malinformation,' 'MDM,' 'misinfo,' 'disinfo,' or 'malinfo.'" *See* Interrogatories, Definition O.

2. Defendants object to the definitions of CDC, CISA, DHS, HHS, NIAID, and White House Communications Team to the extent those definitions include “any . . . agent,” “contractors” and “any subordinate agency or entity” of those agencies on the ground that those definitions are overbroad and may include persons and entities that are not under the supervision or control of any Defendant. In particular, HHS and DHS also object to the extent any Interrogatory seeks a Department-wide response as unduly burdensome and disproportionate to the needs of the case. As the least burdensome sources of information consistent with Rules 26 and 33 that is potentially responsive to the Interrogatories, HHS has identified the Office of the Surgeon General (OSG), NIAID, and CDC, and DHS has identified its Headquarters (HQ).

3. The individual Defendants Dr. Fauci, Dr. Murthy, Ms. Easterly, and Ms. Jean-Pierre, construe the Complaint and Amended Complaint as seeking relief against them each in their official capacity as head of agencies of various components of agencies or other offices of the Federal Government, including NIAID, HHS, CISA, and the Office of the White House Press Secretary, and, accordingly, each individual Defendant objects or responds to each Interrogatory exclusively through his or her corresponding agency Defendant. Individual Defendant Jankowicz has no successor in office, and the Disinformation Governance Board is paused. Moreover, DHS interprets any relief sought as against Ms. Jankowicz in her official capacity within DHS HQ, and, accordingly, she objects or responds to each Interrogatory exclusively through DHS. Defendants object to any Interrogatory seeking from an individual Defendant a response that can be provided by that individual Defendant’s corresponding agency in a manner that is less burdensome to Defendants and proportional to the needs of the case.

4. Defendants object to the definition of “communication” to the extent it is meant to cover anything beyond e-mail exchanges, as overbroad and disproportional to the needs of the

case, particularly in light of the expedited nature of the discovery now ongoing

5. Defendants object to the definition of “document” to the extent it includes “documents retained on personal devices and/or in personal e-mail accounts or other personal accounts.” Documents found on personal devices or within electronic personal accounts would not be in the custody or control of any Defendant. Defendants further object on the grounds that this definition is an unwarranted invasion of the privacy of non-parties and seeks information protected by the Privacy Act, 5 U.S.C. § 552a, et seq.

6. Defendants object to the definition of “identify” to the extent it calls for disclosure of information covered by any applicable privilege or protection over, among other elements, a person’s “email address, and present or last known address and telephone number

7. Defendants object to the use of the undefined term “Meeting” in a manner incompatible with, and calculating to expand the obligations imposed by, the Government in the Sunshine Act, 5 U.S.C. 552b.

8. Defendants object to the definition of “Social-Media Platform” as overbroad, because it includes “*any* organization that provides a service for public users to disseminate . . . content . . . to other users or the public,” along with any “contractors, or any other person . . . acting on behalf of the Social-Media Platform . . . as well [as] subcontractors or entities used to conduct fact-checking or any other activities relating to Content Modulation.” Such a definition is overbroad because the Complaint (and the Amended Complaint) contains no nonconclusory allegation that Defendants communicated with each and every organization that allows users to “disseminate . . . content” to other users, along with any persons or entities affiliated with those organizations. Defendants will construe “Social-Media Platform” to encompass Facebook, Instagram, Twitter, LinkedIn, and YouTube.

9. Defendants object to the definition of “You” an “Your” in each Interrogatory as overbroad, as it includes “any officers, officials, employees, agents, staff members, contractors, and other(s)” acting at the direction, or on behalf, of any Defendant served with any Interrogatory. Such a definition also is not proportional to the needs of the case, especially given the expedited, abbreviated discovery process in which Defendants have only a limited amount of time to respond to Plaintiffs’ Interrogatories. Defendants interpret any Interrogatory relying on this definition as applying solely to the named Defendants upon whom the Interrogatory was served insofar as a response to such Interrogatory by such Defendant is consistent with Rules 26 and 33. In particular, Plaintiffs’ allegations against each individual Defendant concerns actions taken in that individual’s official capacity, and, accordingly, the agency Defendant corresponding to and that employed each individual Defendant is the proper party for objecting and responding to Plaintiffs’ Interrogatories, as explained in Paragraphs 2 and 3 above.

10. Defendant Jean-Pierre objects to the definition of “You” and “Your” as overbroad as it includes “any officers, officials, employees, agents, staff members, contractors, or other(s) acting at the direction of Jennifer Rene Psaki, in her official capacity as Press Secretary, or at the direction of her successor.” Such a definition is not proportional to the needs of the case to the extent it is interpreted to extend beyond the Office of the White House Press Secretary, especially given the expedited, abbreviated discovery process where Defendant has only a limited amount of time to conduct a document search and produce responsive documents. Defendant has interpreted this request as applying solely to the Office of the White House Press Secretary.

11. Defendants object to Instruction 1. Plaintiffs cite to no authority requiring a Defendant to “describe the efforts [it has] made to locate . . . document[s]” that are not in its custody and control “and identify who has control of the document and its location.”

12. Defendants object to Instruction 2 to the extent it exceeds the requirements of Fed. R. Civ. P. 26(b)(6). Defendants specifically decline to produce privileged information. Defendants further object to any requirement that they produce a privilege log for privileged material not otherwise properly within the scope of discovery or as to which no privilege log would be required under Federal Rule of Civil Procedure 26(b)(5).

13. Defendants object to Instruction 3. Plaintiffs cite to no authority indicating that, if Defendants object to an Interrogatory on burden grounds, Defendants must “stat[e] the approximate number of documents to be produced, the approximate number of person-hours to be incurred in the identification, and the estimated cost of responding to the request.” Further, it is unclear how Defendants could provide that type of information without conducting certain burdensome searches and reviews that Defendants sought to avoid through their objections.

14. Defendants object to Instruction 5 to the extent it requires Defendants to respond based on production of electronic documents “with all metadata and delivered in their original format.” Plaintiffs may identify the precise categories of metadata they want Defendants’ productions to contain, and Defendants can determine whether they can provide those categories of metadata without an undue burden.

15. Defendants object to Instruction 6 to the extent that it requires Defendants to respond based on production of documents in a format other than the format in which they are “kept in the usual course of business.” Fed R. Civ. P. 34(b)(2)(E). Defendants object to Instruction 6 to the extent that it requests the production of all e-mail “forwards” for e-mails produced to Plaintiffs. That Instruction may call for the production of documents that are not found in the e-mail files of the relevant custodians used by Defendants.

16. Defendants object to Instruction 8 as unduly broad. Ms. Psaki served as White

House Press Secretary from January 20, 2021, until May 13, 2022, when Ms. Jean-Pierre became White House Press Secretary. Defendants interpret the Interrogatories directed at the White House Press Secretary as applying to Ms. Psaki from January 20, 2021, through May 13, 2022, and Ms. Jean-Pierre from May 13, 2022, to July 18, 2022. Anything else would be disproportional to the needs of the case. Such disproportionality is further aggravated by the discovery burden being sought on White House officials. *See Cheney v. U.S. District Court*, 542 U.S. 367, 385 (2004).

GENERAL OBJECTIONS APPLICABLE TO ALL INTERROGATORIES

1. The general objections set forth below apply to each and every Interrogatory discussed below. In asserting Defendants' objections to any particular Interrogatory, Defendants may assert an objection that is the same as, or substantially similar to, one or more of these objections. That Defendants may refer, with particularity, to some, but not all, of the general objections described immediately below in their objections to Plaintiffs' individual Interrogatories, does not indicate that Defendants have waived any of these general objections as to any of Plaintiffs' Interrogatories.

2. Defendants object to any discovery taking place in this case to the extent Plaintiffs assert cognizable claims seeking review of governmental agency action, including claims under Administrative Procedure Act, because resolution of any such claims should be based upon the "administrative record" in this case. *See Fla. Power & Light Co. v. Lorion*, 470 U.S. 729, 743-44 (1985); *Citizens to Preserve Overton Park, Inc. v. Volpe*, 401 U.S. 402, 420 (1971). That said, Defendants understand that the Court has allowed preliminary-injunction-related expedited discovery to proceed. Thus, while preserving their broad objection to any and all discovery, Defendants make objections stated below in light of the current procedural posture of the case.

3. Defendants object to each Interrogatory insofar as it is directed to any Defendant that is head of a Defendant agency as overly broad, unduly burdensome, and disproportional in light of the extraordinarily expedited discovery schedule in this case, given that Plaintiffs have not first sought the information from the agency itself, or through alternative, less burdensome means. *See* Fed. R. Civ. P. 26(b)(2)(C).

4. Defendants object to each Interrogatory as overbroad, unduly burdensome, and disproportional to the needs of the case, insofar as it purports to require a response from each agency concerning components of the agency or concerning governmental entities outside the agency whose actions are not challenged in the Complaint or Amended Complaint and whose information is not reasonably available to the agency or agency component whose alleged conduct is challenged in the Complaint or Amended Complaint. Defendant agencies include numerous components and employ thousands of individuals. Any construction of an Interrogatory that would require a Defendant agency to furnish information held by all such individuals, or require a Defendant agency to furnish information held by non-party agencies of the Federal Government, would be massively burdensome and disproportional to the needs of this case. Each Defendant agency will identify appropriate individuals within the agency who will review and respond to each Interrogatory. *See, e.g., In re EpiPen*, MDL No. 2785, 2018 WL 1440923, at *2 (D. Kan. Mar. 15, 2018) (“[T]he party responding to discovery requests is typically in the best position to know and identify those individuals within its organization likely to have information relevant to the case.”).

5. Defendants object to the Interrogatories to the extent that they seek (a) attorney work product; (b) communications protected by the attorney-client privilege; (c) information protected by the deliberative process privilege or law enforcement privilege or other similar

privilege; (d) material the disclosure of which would violate legitimate privacy interests and expectations of persons not party to this litigation; (e) information protected by any form of executive privilege; or (f) information covered by any other applicable privilege or protection.

6. Defendants object to any Interrogatory seeking discovery from the White House as unduly burdensome, and disproportional to the needs of the case. *See generally Cheney*, 542 U.S. at 367. Plaintiffs' Interrogatories directed to White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See id.* at 385. That burden is especially undue at this stage of the litigation given that Defendants' motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Further, the Interrogatories seeking response from the White House are unduly burdensome and disproportional to the needs of the case when Plaintiffs have not first exhausted all available opportunities to seek related information from other sources. *See Order, Centro Presente*, No. 1:18-cv-10340 (D. Mass. May 15, 2019) (requiring plaintiff to exhaust all discovery on other defendants before considering whether there was "continuing need for discovery sought on the White House"); *cf. Karnoski v. Trump*, 926 F.3d 1180, 1207 (9th Cir. 2019) (vacating "district court's discovery orders because the district court did not fulfill its obligation 'to explore other avenues, short of forcing the Executive to invoke privilege'" (quoting *Cheney*, 542 U.S. at 390)).

7. Moreover, to the extent any Interrogatory a response requires review of information involving White House personnel, it is inappropriate because it may have the effect of seeking information protected by the presidential communications privilege, a "presumptive privilege" "fundamental to the operation of Government and inextricably rooted in the separation of powers under the Constitution" that attaches to presidential communications. *United States v.*

Nixon, 418 U.S. 683, 708 (1974); see *In re Sealed Case*, 121 F.3d 729, 743-44 (D.C. Cir. 1997). Although the presidential communications privilege can be overcome by showing a “specific need” in a criminal case, *Judicial Watch, Inc. v. Dep’t of Justice*, 365 F.3d 1108, 1112 (D.C. Cir. 2004), the presumption against disclosure is even higher in a civil case like this one, *American Historical Ass’n v. Nat’l Archives & Records Admin.*, 402 F. Supp. 2d 171, 181 (D.D.C. 2005). Such discovery violates the separation of powers and creates an undue burden and distraction from those individuals’ critical executive responsibilities. See *Cheney*, 542 U.S. at 389.

8. Defendants object to each Interrogatory to the extent it seeks information or documents that are not in the custody or control of any Defendant.

9. Defendants object to each Interrogatory to the extent it seeks responses based on all communications and documents from each Defendant relating to the substantive topic identified in the Interrogatory. The parties are currently involved in an expedited, abbreviated discovery process in which Defendants have only a limited amount of time to respond.

10. Defendants specifically reserve the right to make further objections as necessary to the extent additional issues arise regarding the meaning of and/or information sought by Plaintiffs’ Interrogatories.

**PRELIMINARY STATEMENT REGARDING
EXCESSIVELY NUMEROUS INTERROGATORIES**

1. Contrary to Fed. R. Civ. P. 33(a) and to LR33.1 of the Local Civil Rules, Plaintiffs erroneously and improperly served on July 18, 2022 First PI Interrogatories totaling 110 enumerated interrogatories as to 10 recipient Defendants. Even excluding duplicative interrogatories served on separate Defendants (at least in substance, if not form), there would still have been 34 distinct interrogatories.

2. Either number exceeds the 25 interrogatories permitted by the Federal Rules of

Civil Procedure. *Global Tubing, LLC v. Tenaris Coiled Tubes, LLC*, No. 17-cv-3299, 2020 WL 12443175 at *2 (S.D. Tex. Nov. 25, 2020) (quoting 8B Charles Alan Wright et al., *Federal Practice & Procedure* § 2168.1 (3d ed. 2020)); accord *Kleiman v. Wright*, No. 18-cv-80176, 2020 WL 1666787 at *1 (S.D. Fla. Apr. 3, 2020); *Vinton v. Adam Aircraft Indus., Inc.*, 232 F.R.D. 650, 664 (D. Colo. 2005); see also *Zito v. Leasecomm Corp.*, 233 F.R.D. 395, 399 (S.D.N.Y. 2006); see, e.g., *Am. Council of Blind of Metro. Chi. v. Chi.*, No. 19-cv-6322, 2021 WL 5140475 at *1-2 (N.D. Ill. Nov. 4, 2021); *Fair Housing Ctr. of Centr. Ind. v. Welton*, No. 18-cv-01098, 2019 WL 2422594 at *5 (S.D. Ind. June 10, 2019). In a similar vein, LR33.1 of the Local Civil Rules, concerning “Number of Interrogatories,” provides as follows (emphasis added): “No party shall serve on any other party *more than 25 interrogatories in the aggregate* without leave of court.” Adherence to the 25-interrogatory limitation is especially appropriate at this stage of the instant action, where Defendants are already addressing extensive requests for production of documents ahead of the Rule 26 conference for the limited purpose of providing Plaintiffs with additional information concerning the already-filed application for a preliminary injunction. Cf. *Gray v. Price*, No. 19-cv-10383, 2020 WL 12721645 at *5 (E.D. Mich. Feb. 12, 2020).

3. After alerting Plaintiffs to this issue in an August 1, 2022, letter, and following additional e-mail correspondence with Plaintiffs, the parties agreed on August 11, 2022 to resolve the excessive numerosity problem as follows: Plaintiffs requested that (a) each Defendant recipient is to answer Interrogatories 1 through 5 of the First PI Interrogatories directed to CDC, with the reference to the CDC (in Interrogatory 1) to “be adjusted to refer to the recipient of the interrogatory,” and (b) certain Defendants are to answer additional interrogatories, totaling 20, specified by Plaintiffs, and Plaintiffs did not object to Defendants’ proposal that all remaining interrogatories be deemed withdrawn.

4. Defendants have set forth more fully below their objections and responses to the 5 “Common” and 20 “additional” Interrogatories specified by Plaintiff on August 11, 2022, and preserve all other objections with respect to all other Interrogatories served on July 18, 2022 (the “Withdrawn Interrogatories”), to the extent they are not deemed withdrawn. In particular, Defendants object to those Interrogatories as exceeding the numerical limit in FRCP 33(a) and LR33.1 of the Local Civil Rules.

SIGNATURES FOR RESPONSES

1. Insofar as an Interrogatory is not objected to through the undersigned counsel, the agency Defendants respond to them below, with the signatures of the following (attached):

- a. For OSG: **OSG 2**, Chief of Staff, OSG
- b. For NIAID: **NIAID 5**, Ph.D., Deputy Director for Science Management and Executive Officer, NIAID
- c. For CDC: **CDC 1**, Health Communications Specialist and Director, Division of Digital Media, CDC
- d. For DHS: **DHS 3**, Acting Assistant Secretary of Homeland Security for Counterterrorism, Threat Prevention, and Law Enforcement Policy
- e. For CISA: **CISA 4**, Lead of Election Security & Resilience, CISA

OBJECTIONS AND RESPONSES TO SPECIFIC INTERROGATORIES

Common Interrogatory No. 1:

“Identify every officer, official, employee, staff member, personnel, contractor, or agent of” recipient Defendant “or any other federal official or agency who has communicated or is communicating with any Social-Media Platform regarding Content Modulation and/or Misinformation”

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants further object to this Interrogatory as overbroad, unduly burdensome, and not proportional to the needs of this case. This Interrogatory calls for identifying “personnel” or “contractor[s]” of any Defendant or any employee or subordinate of any Defendant who have communicated with any and all “Social-Media Platform[s],” even if those platforms are not at issue in the Complaint (or in the Amended Complaint), and including each platform’s “officers, agents, employees, contractors, or any other person employed by or acting on behalf of [such] Social-Media Platform.” Defendants cannot conduct an exhaustive search to uncover all possible responsive information under the current, abbreviated expedited discovery schedule. Such expedited discovery is especially burdensome given that Defendants’ motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Defendants also object to the Interrogatory to the extent a response requires review of internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to agency communications. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, presidential communications privilege or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44. Moreover, this Interrogatory is overbroad, unduly burdensome, and disproportional to

the needs of the case, insofar as it purports to require a response from each agency concerning components of the agency or concerning governmental entities outside the agency whose actions are not challenged in the Complaint or Amended Complaint and whose information is not reasonably available to the agency or agency component whose alleged conduct is challenged in the Complaint or Amended Complaint.

Further, Defendants object to this Interrogatory on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportional to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.,* Order, *Centro Presente*, No. 1:18-cv-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d 1180, 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. That burden is especially undue at this stage of the litigation given that Defendants' motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Additionally, Defendants object to this Interrogatory to the extent a response requires review of information protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Additionally, Defendants object to this Interrogatory to the extent it is directed to information protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such information, the request imposes a burden on Defendant disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-privileged information. *See Cheney*, 542 U.S. at 389.

Defendants further object to this Interrogatory as unreasonably cumulative and duplicative

of Plaintiffs' Requests for Production 2 and 3, in response to which Defendants are producing non-privileged e-mail communications between Defendants and employees of the "Social-Media Platforms" concerning Misinformation located within a review population consisting of e-mail files that (i) are collected from custodians who, having been identified through Defendants' internal inquiry, are known to have communicated with employees of the Social-Media Platforms, and (ii) contain one or more reasonable search terms calculated to identify which of the communications identified in (i) relate to Misinformation. Those Requests for Production provide a more expeditious and significantly less burdensome method for Plaintiffs to obtain the information sought, considering the expedited nature of the discovery here and the broad scope of this Interrogatory.

Additionally, Defendants object to this Interrogatory as overbroad and disproportional to the needs of the case, particularly in light of the expedited nature of the discovery, to the extent "communication" is meant to cover anything beyond e-mail exchanges. Defendants also object to the Interrogatory as overbroad and disproportional to the needs of the case to the extent it requests that responding agencies identify every individual who may have been included on any e-mail exchange, whether as sender or recipient or simply copied on the e-mail, between any Defendant and a social media company.

RESPONSE: Subject to and without waiving the above objections, Defendants provide the following responses by the agency Defendants, HHS, NIAID, CDC, DHS, and CISA.

HHS:

OSG: Subject to and without waiving the above objections, OSG refers to the documents being produced in response to Requests For Production 2 and 3, and states further that the custodians whose e-mails were collected include the following current and former OSG personnel:

- [REDACTED] OSG 1, U.S. Surgeon General
- [REDACTED] OSG 2, Chief of Staff
- [REDACTED] OSG 3, Chief Engagement Officer for the U.S. Surgeon General
- [REDACTED] OSG 4, Associate Director of Science and Policy
- [REDACTED] OSG 5, Senior Advisor
- [REDACTED] OSG 6, Chief Innovation and Design Officer
- [REDACTED] OSG 7, Senior Advisor

NIAID: Subject to and without waiving the above objections, NIAID refers to the documents being produced in response to Requests For Production 2 and 3, and states further that the custodians whose e-mails were collected include the following current NIAID personnel:

- [REDACTED] NIAID 1, M.D., Director, NIAID
- [REDACTED] NIAID 2, Director, Office of Communications and Government Relations, NIAID
- [REDACTED] NIAID 3, Scientific Communications Editor, News and Science Writing Branch, Office of Communications and Government Relations, NIAID
- [REDACTED] NIAID 4, Chief, News and Science Writing Branch, Office of Communications and Government Relations, NIAID

CDC: Subject to and without waiving the above objections, CDC refers to the documents being produced in response to Requests For Production 2 and 3, and states further that the custodians whose e-mails were collected include the following current and former CDC personnel:

- [REDACTED] CDC 1, Health Communications Specialist/Chief, Digital Media Branch
- [REDACTED] CDC 2, Health Communications Specialist
- [REDACTED] CDC 3, Associate Deputy Director
- [REDACTED] CDC 4, Public Health Analyst

- **CDC 5**, Associate Director for Health Communications Science
- **CDC 6**, Health Communications Specialist
- **CDC 7**, Health Communications Specialist
- **CDC 8**, Health Communications Specialist
- **CDC 9**, Public Affairs Specialist
- **CDC 10**, Supervisory Health Communications Specialist
- **CDC 11**, Health Communications Specialist
- **CDC 12**, Health Communications Specialist
- **CDC 13**, Health Communications Specialist
- **CDC 14**, Deputy Chief Operating Officer
- **CDC 15**, Behavioral Scientist
- **CDC 16**, Health Communications Specialist

DHS: Subject to and without waiving any of the foregoing objections, and based on a reasonable inquiry under the circumstances of abbreviated, expedited discovery, DHS refers to the documents being produced in response to Requests For Production 2 and 3, and states further that the custodians whose e-mails were collected include the following current and former DHS personnel:

- **DHS 1**, former Executive Director of the DHS Disinformation Governance Board
- **DHS 2**, Under Secretary of Homeland Security for Strategy, Policy, and Plans
- **DHS 3**, Acting Assistant Secretary of Homeland Security for Counterterrorism and Threat Prevention
- **DHS 4**, former Assistant Secretary of Homeland Security for Counterterrorism

and Threat Prevention

- **DHS 5**, Director, Private Sector Engagement, Office of Intelligence and Analysis
- **DHS 6**, Associate Director for Strategic Engagement, DHS Center for Prevention Programs and Partnerships
- **DHS 7**, Acting Assistant Secretary of Homeland Security for Cyber, Infrastructure, Risk and Resilience
- **DHS 8**, former Acting Assistant Secretary of Homeland Security for Counterterrorism and Threat Prevention

CISA: CISA has identified the following custodians as having relevant communications, as produced in response to Requests For Production 2 and 3:

- **CISA 1**, Director, CISA
- **CISA 2**, former Director, CISA
- **CISA 3**, former Senior Election Lead, CISA
- **CISA 4**, Lead, Election Security and Resilience (ESR), National Risk Management Center (NRMC), CISA
- **CISA 5**, Chief, Mis-, Dis-, and Malinformation (MDM) Team, NRMC, CISA
- **CISA 6**, Engagements Lead, MDM Team, NRMC, CISA

In addition to the custodians identified above, CISA has identified the following current and former agency personnel as appearing in the communications produced in response to Plaintiffs' Requests For Production:

- **CISA 7**, Resilience Lead, MDM Team, NRMC, CISA
- **CISA 8**, Analysis and Response Lead, MDM Team, NRMC, CISA
- **CISA 9**, Analyst, MDM Team, NRMC, CISA
- **CISA 10**, former Analyst, Countering Foreign Influence Task Force (CFITF) (which was the predecessor to the MDM team), NRMC, CISA

Common Interrogatory No. 2:

Identify all Communications with any Social-Media Platform relating to Content Modulation and/or Misinformation.

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants further object to this Interrogatory as overbroad, unduly burdensome, and not proportional to the needs of this case. This Interrogatory calls for information from any Defendant or any employee or subordinate of any Defendant, to any and all “Social-Media Platform[s],” even if those platforms are not at issue in the Complaint (or in the Amended Complaint), and including each platform’s “officers, agents, employees, contractors, or any other person employed by or acting on behalf of [such] Social-Media Platform.” Defendants cannot conduct an exhaustive search to uncover all possible responsive information under the current, abbreviated expedited discovery schedule. Such expedited discovery is especially burdensome given that Defendants’ motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Defendants also understand this Interrogatory to seek only a response based on communications between Defendants and third parties outside the government. To the extent that this Interrogatory seeks internal information referring to such communications, Defendants object to the Interrogatory as not proportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery and would be unnecessary in light of Defendants’ agreement to produce the external communications themselves. Defendants also object to the Interrogatory to the extent a response requires review of internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to agency communications. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory

national security privilege, presidential communications privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44. Moreover, this Interrogatory is overbroad, unduly burdensome, and disproportional to the needs of the case, insofar as it purports to require a response from each agency concerning components of the agency or concerning governmental entities outside the agency whose actions are not challenged in the Complaint or Amended Complaint and whose information is not reasonably available to the agency or agency component whose alleged conduct is challenged in the Complaint or Amended Complaint.

Further, Defendants object to this Interrogatory on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportional to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.*, Order, *Centro Presente*, No. 1:18-cv-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d 1180, 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. That burden is especially undue at this stage of the litigation given that Defendants' motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Additionally, Defendants object to this Interrogatory to the extent a response requires review of information protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such information, the request imposes a burden on Defendant disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-

privileged information. *See Cheney*, 542 U.S. at 389.

Additionally, Defendants object to this Interrogatory as overbroad and disproportional to the needs of the case, particularly in light of the expedited nature of the discovery, to the extent “communication” is meant to cover anything beyond e-mail exchanges.

Defendants further object to this Interrogatory as unreasonably cumulative and duplicative of Plaintiffs’ Requests for Production 2 and 3, in response to which Defendants are producing non-privileged e-mail communications between Defendants and employees of the Social-Media Platforms concerning Misinformation located within a review population consisting of e-mail files that (i) are collected from custodians who, having been identified through Defendants’ internal inquiry, are known to have communicated with employees of the Social-Media Platforms, and (ii) contain one or more reasonable search terms calculated to identify which of the communications identified in (i) relate to Misinformation. Those Requests for Production provide a more expeditious and significantly less burdensome method for Plaintiffs to obtain the information sought, considering the expedited nature of the discovery here and the broad scope of this Interrogatory.

RESPONSE: Subject to and without waiving the above objections, the agency Defendants, HHS, NIAID, CDC, DHS, and CIS, respond and refer Plaintiffs to the documents being produced in response to Plaintiffs’ First Requests For Production to Defendants.

Common Interrogatory No. 3:

Identify all Social-Media Platforms, including their officers, agents, or employees, with which You have communicated or are communicating with relating to Content Modulation and/or Misinformation.

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants further object to this Interrogatory as overbroad, unduly burdensome, and not proportional to the needs of this case. This Interrogatory calls for a response based on communications from any Defendant or any employee or subordinate of any Defendant, to any and all Social-Media Platforms, even if those platforms are not at issue in the Complaint (or in the Amended Complaint), and including each platform’s “officers, agents, employees, contractors, or any other person employed by or acting on behalf of [such] Social-Media Platform.” Defendants cannot conduct an exhaustive search to uncover all possible responsive information under the current, abbreviated expedited discovery schedule. Such expedited discovery is especially burdensome given that Defendants’ motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, presidential communications privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44. Moreover, this Interrogatory is overbroad, unduly burdensome, and disproportional to the needs of the case, insofar as it purports to require a response from each agency concerning components of the agency or concerning governmental entities outside the agency whose actions are not challenged in the Complaint or Amended Complaint and whose information is not reasonably available to the agency or agency component whose alleged conduct is challenged in the Complaint or Amended Complaint.

Further, Defendants object to this Interrogatory on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportional to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.,* Order, *Centro Presente*, No. 1:18-cv-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d 1180, 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. That burden is especially undue at this stage of the litigation given that Defendants’ motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Additionally, Defendants object to this Interrogatory to the extent a response requires review of information protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such information, the request imposes a burden on Defendant disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-privileged information. *See Cheney*, 542 U.S. at 389.

Additionally, Defendants object to this Interrogatory as overbroad and disproportional to the needs of the case, particularly in light of the expedited nature of the discovery, to the extent “communication” is meant to cover anything beyond e-mail exchanges.

Defendants further object to this Interrogatory as unreasonably cumulative and duplicative of Plaintiffs’ Requests for Production 2 and 3, in response to which Defendants are producing non-privileged e-mail communications between Defendants and employees of the “Social-Media Platforms” concerning Misinformation located within a review population consisting of e-mail files that (i) are collected from custodians who, having been identified through Defendants’

internal inquiry, are known to have communicated with employees of the Social-Media Platforms, and (ii) contain one or more reasonable search terms calculated to identify which of the communications identified in (i) relate to Misinformation. Those Requests for Production provide a more expeditious and significantly less burdensome method for Plaintiffs to obtain the information sought, considering the expedited nature of the discovery here and the broad scope of this Interrogatory.

RESPONSE: Subject to and without waiving the above objections, the agency Defendants, HHS, NIAID, CDC, DHS, and CISA, respond and refer Plaintiffs to the documents being produced in response to Plaintiffs' First Requests For Production to Defendants.

Common Interrogatory No. 4:

Identify all meetings with any Social-Media Platform relating to Content Modulation and/or Misinformation.

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants further object that the Interrogatory is vague and ambiguous, including through the term "relating to . . . Misinformation." Defendants further object to this Interrogatory as overbroad, unduly burdensome, and not proportional to the needs of this case. This Interrogatory calls for a response based on "meetings" by any Defendant or any employee or subordinate of any Defendant, with any and all Social-Media Platforms, even if those platforms are not at issue in the Complaint (or in the Amended Complaint), and including each platform's "officers, agents, employees, contractors, or any other person employed by or acting on behalf of [such] Social-Media Platform." Defendants cannot conduct an exhaustive search to uncover all possible responsive information under the current, abbreviated expedited discovery schedule. Such expedited discovery is especially burdensome given that Defendants' motion to dismiss the Amended Complaint for lack

of subject-matter jurisdiction and other deficiencies is forthcoming. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, presidential communications privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject outside the administrative record. *Lorion*, 470 U.S. at 743-44. Moreover, this Interrogatory is overbroad, unduly burdensome, and disproportional to the needs of the case, insofar as it purports to require a response from each agency concerning components of the agency or concerning governmental entities outside the agency whose actions are not challenged in the Complaint or Amended Complaint and whose information is not reasonably available to the agency or agency component whose alleged conduct is challenged in the Complaint or Amended Complaint.

Further, Defendants object to this Interrogatory on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportional to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.*, Order, *Centro Presente*, No. 1:18-cv-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d 1180, 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. That burden is especially undue at this stage of the litigation given that Defendants' motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Additionally, Defendants object to this Interrogatory to the extent a response requires review of information protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not

entitled to such information, the request imposes a burden on Defendant disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-privileged information. *See Cheney*, 542 U.S. at 389.

Defendants further object to this Interrogatory as unreasonably cumulative and duplicative of Plaintiffs' Requests for Production 2, 3, and 4, in response to which Defendants are producing non-privileged e-mail communications between Defendants and employees of the Social-Media Platforms concerning Misinformation located within a review population consisting of e-mail files that (i) are collected from custodians who, having been identified through Defendants' internal inquiry, are known to have communicated with employees of the Social-Media Platforms, and (ii) contain one or more reasonable search terms calculated to identify which of the communications identified in (i) relate to Misinformation. Those Requests for Production provide a more expeditious and significantly less burdensome method for Plaintiffs to obtain the information sought, considering the expedited nature of the discovery here and the broad scope of this Interrogatory.

RESPONSE: Subject to and without waiving the above objections, Defendants provide the following responses by the agency Defendants, HHS, NIAID, CDC, DHS, and CISA:

HHS. Subject to and without waiving any of the foregoing objections, and based on a reasonable inquiry under the circumstances of abbreviated, expedited discovery, HHS has identified OSG, NIAID, and CDC as available sources of information that is potentially responsive to Plaintiffs' discovery requests. HHS directs Plaintiffs to those agencies' responses.

OSG. Subject to and without waiving any of the foregoing objections, and based on a reasonable inquiry under the circumstances of abbreviated, expedited discovery, OSG responds that the following meetings took place with the Social-Media Platforms relating to

Misinformation:

- On July 12, 2021, from 3:00 pm to 3:30 pm ET, [OSG 3] from OSG met remotely with [Twitter 1] and [Twitter 2] from Twitter. [OSG 7] from U.S. Digital Response was invited and may have also attended. The meeting provided notice of the upcoming OSG Advisory and a high-level view of what issues OSG would be prioritizing in the Advisory.
- On July 14, 2021, from 3:00 pm to 3:30 pm ET, [OSG 3] from OSG met remotely with [YouTube 1] from YouTube, [Google 1] from Google, and [YouTube 2] from YouTube. The meeting provided notice of the upcoming OSG Advisory and a high-level view of what issues OSG would be prioritizing in the Advisory.
- On July 16, 2021, from 3:00 pm to 3:30 pm ET, [OSG 3] from OSG and [OSG 7] from U.S. Digital Response met remotely with [Facebook 1] and [Facebook 2] from Facebook. [Facebook 3] and [Facebook 4] from Facebook were invited and may have also attended. The meeting discussed the newly issued OSG Advisory.
- On July 23, 2021, from 1:30 pm to 2:00 pm ET, [OSG 1] and [OSG 3] from OSG, and [OSG 8] (who OSG understands to be a then part-time consultant supporting the Office of Science Technology and Policy) met remotely with [Facebook 5] and (very likely) [Facebook 4] from Facebook. The meeting discussed a recent e-mail from [Facebook 5] to [OSG 1] concerning recent public comments by the Administration about Facebook.
- On July 30, 2021, from 2:00 pm to 2:30 pm ET, [OSG 3] from OSG met with [YouTube 1] from YouTube, [Google 2] from Google, and [Google 1] from Google. The topics discussed included YouTube/Google following up on the announcement of the

OSG Advisory to share more of the work it was doing around health mis- and disinformation.

NIAID. Subject to and without waiving any of the foregoing objections, and based on a reasonable inquiry under the circumstances of abbreviated, expedited discovery, NIAID responds that no meetings took place with the Social-Media Platforms relating to Misinformation. NIAID has identified two possible meetings to discuss the potential participation by the NIAID director in U.S. Government efforts to publicize health information and provide COVID-19 and vaccine education via social media, which are not responsive to the Interrogatory, but are identified in the documents being produced in response to Plaintiffs' First Requests For Production to Defendants:

- Facebook approached NIAID in March 2020 to discuss public service announcements and ads, Facebook's CV19 hub, and an interview between **NIAID 1** and **[REDACTED]** **Facebook 6**; NIAID scheduled the interview between **NIAID 1** and **Facebook 6** (which aired on Facebook Live)
- NIAID was invited to, but did not attend, a meeting scheduled for March 4, 2021, to discuss possible Facebook Live interviews with celebrities/influencers related to COVID-19 vaccines

CDC. Subject to and without waiving any of the foregoing objections, and based on a reasonable inquiry under the circumstances of abbreviated, expedited discovery, CDC responds that the following meetings took place with the Social-Media Platforms relating to Misinformation:

- On May 14, 2021, and May 28, 2021, there were virtual "Be on the Lookout" meetings concerning certain items of developing and prevalent COVID-19 misinformation on

- social media. The invitees included: **Twitter 2** from Twitter; **Google 3**, **Google 1**, and **YouTube 1** from Google; **Facebook 1**, **Facebook 7**, **Facebook 8**, and **Facebook 9** from Facebook; **Reingold 1** from Reingold; **Census 1**, **Census 2**, and **Census 3** from the United States Census Bureau (“Census”); and **CDC 13**, **CDC 1**, and **CDC 3** from CDC.
- On February 4, 2021 and February 25, 2021 there were virtual or telephonic meetings during which it is likely that misinformation was discussed among other topics. The invitees included: **Facebook 1**, **Facebook 10**, **Facebook 11**, **Facebook 12**, **Facebook 13**, **Facebook 7**, **Facebook 3**, and **Facebook 9** from Facebook; and **CDC 8**, **CDC 2**, and **CDC 1** from CDC.
 - On March 18, 2021, there was a virtual or telephonic meeting during which it is likely that misinformation was discussed among other topics. The invitees included: **Facebook 1**, **Facebook 10**, **Facebook 11**, **Facebook 12**, **Facebook 13**, **Facebook 7**, **Facebook 3**, and **Facebook 9** from Facebook; **HHS 1** and **HHS 2** from the Office of the Assistant Secretary of Public Affairs within HHS; and **CDC 8**, **CDC 2**, and **CDC 1** from CDC.
 - On March 25, 2021, there was a virtual or telephonic meeting to discuss misinformation. The invitees included **Facebook 1**, **Facebook 14**, **Facebook 10**, **Facebook 11**, **Facebook 2**, **Facebook 15**, **Facebook 16**, **Facebook 12**, **Facebook 17**, **Facebook 13**, **Facebook 18**, **Facebook 7**, **Facebook 19**, **Facebook 3**, and **Facebook 9** from Facebook; and **CDC 8**, **CDC 2**, and **CDC 1** from CDC.
 - On May 13, 2021, there was a virtual or telephonic meeting during which it is likely

- that misinformation was discussed among other topics. The invitees included: Facebook 1, [REDACTED], Facebook 10, Facebook 11, Facebook 20, Facebook 12, [REDACTED], Facebook 13, Facebook 7, Facebook 3, and Facebook 9 from Facebook; and CDC 8, [REDACTED], CDC 2, and CDC 1 from CDC.
- On May 19, 2021, there was a virtual meeting to provided training on Facebook’s channel for reporting misinformation. The invitees included: CDC 8, [REDACTED], CDC 1, CDC 13, CDC 3, CDC 17, and CDC 2 from CDC; Census 1, Reingold 1, and Reingold 2 from Reingold; Facebook 9 from Facebook; and Census 3, Census 4, and Census 2 from Census.
 - On May 20, 2021, there was a virtual or telephonic meeting during which it is likely that misinformation was discussed among other topics. The invitees included: Facebook 1, [REDACTED], Facebook 10, Facebook 11, Facebook 21, Facebook 12, [REDACTED], Facebook 13, Facebook 7, Facebook 3, and Facebook 9 from Facebook; CDC 8, [REDACTED], CDC 2, CDC 5, and CDC 1 from CDC; and Reingold 1 from Reingold.
 - On August 31, 2021, there was a virtual meeting to discuss misinformation, including misinformation related to the Vaccine Adverse Event Reporting System (VAERS). The invitees included: CDC 18, CDC 19, CDC 9, CDC 12, CDC 20, [REDACTED], CDC 21, CDC 22, CDC 11, CDC 13, CDC 23, [REDACTED], CDC 6, and CDC 1 from CDC; and Facebook 9 from Facebook.
 - On March 24, 2021, there was a virtual meeting to discuss misinformation with Google/YouTube. The invitees included: Google 3, Google 1, [REDACTED]

- Google 4**, **YouTube 1**, and **Google 5** from Google; **Census 5** and **Census 3** from Census; **Census 1** and **Reingold 1** from Reingold; and **CDC 1**, **CDC 13**, **CDC 3**, **CDC 7**, and **CDC 24** from CDC.
- On March 29, 2022, there was a virtual meeting with Google during which it is likely that misinformation was discussed among other topics. The invitees included: **Google 3** and **Google 1** from Google; and **CDC 25** and **CDC 1** from CDC.
 - On March 31, 2021, there was a virtual meeting with Twitter to discuss COVID-19 misinformation. The invitees included: **Census 5** and **Census 3**, from Census; **Census 1** and **Reingold 1** from Reingold; **CDC 13**, **CDC 3**, **CDC 26**, **CDC 7**, **CDC 24**, and **CDC 1** from CDC; and **Twitter 2** and **Twitter 3** from Twitter.
 - On November 18, 2021, there was a meeting with Twitter to discuss VAERS as it related to misinformation. The invitees included: **Twitter 2**, **Twitter 4**, **Twitter 5**, and **Twitter 6** from Twitter; and **CDC 1**, **CDC 20**, **CDC 23**, **CDC 27**, **CDC 28**, **CDC 12**, **CDC 11**, and **CDC 29** from CDC.

DHS Subject to and without waiving any of the foregoing objections, and based on a reasonable inquiry under the circumstances of abbreviated, expedited discovery, DHS responds that meetings taking place with the Social-Media Platforms relating to Misinformation include, but are not limited to:

- A recurring meeting usually entitled USG – Industry meeting, which has generally had a monthly cadence, and is between government agencies and private industry. Government participants have included CISA’s Election Security and Resilience team, DHS’s Office of Intelligence and Analysis, the FBI’s foreign influence task force, the Justice Department’s national security division, and the Office of the Director of National Intelligence. Industry participants have included Google, Facebook, Twitter, Reddit, Microsoft, Verizon Media, Pinterest, LinkedIn and the Wikimedia Foundation. The topics discussed include, but are not limited to: information sharing around elections risk, briefs from industry, threat updates, and highlights and upcoming watch outs.
- CISA Cybersecurity Advisory Committee (CSAC) Meetings on December 10, 2021; March 31, 2022; and June 22, 2022. The meeting agendas and summaries, including participants, are available on CISA’s website, <https://www.cisa.gov/cisa-cybersecurity-advisory-committee-meeting-resources>.
- Additional meetings identified in documents, include, but are not limited to:

Date	Title
7/20/20	ASD-HKS Tech Policy Paper Series: Levers in the Online Ad Ecosystem
1/18/22	Google + Digital Forum
3/16/22	DHS/Microsoft Disinformation Follow Up
2/1/22	Meta/DHS/DOJ Engagement re: Human Trafficking

CISA: Subject to and without waiving any of the foregoing objections, and based on a reasonable inquiry under the circumstances of abbreviated, expedited discovery, CISA responds that meetings taking place with the Social-Media Platforms relating to Misinformation include, but are not limited to:

- A recurring meeting usually entitled USG – Industry meeting, which has generally had a

monthly cadence, and is between government agencies and private industry. Government participants have included CISA's Election Security and Resilience subdivision, DHS's Office of Intelligence and Analysis, the FBI's foreign influence task force, the Justice Department's national security division, and the Office of the Director of National Intelligence. Industry participants generally include Google, Facebook, Twitter, Reddit, Microsoft but, have also included Verizon Media, Pinterest, LinkedIn, and the Wikimedia Foundation as well. The topics discussed include, but are not limited to: information sharing around elections risk, briefs from industry, threat updates, and highlights and upcoming watch outs.

- A recurring meeting to prepare for and set the agenda for the USG – Industry meeting, and participants have generally included CISA and Facebook.
- CISA Cybersecurity Advisory Committee (CSAC) Meetings on December 10, 2021; March 31, 2022; and June 22, 2022. The meeting agendas and summaries, including participants, are available on CISA's website, <https://www.cisa.gov/cisa-cybersecurity-advisory-committee-meeting-resources>.
- CISA CSAC, Protecting Critical Infrastructure from Misinformation and Disinformation Subcommittee meetings. The Subcommittee was established for the purpose of evaluating and providing recommendations on potentially effective critical infrastructure related counter-MDM efforts that fit within CISA's unique capabilities and mission. Details about the Subcommittee, including membership, are available on CISA's website, https://www.cisa.gov/sites/default/files/publications/CSAC_Subcommittee_Fact_Sheet_05192022_508c.pdf.
- Meetings convened by the Election Infrastructure Subsector Government Coordinating

Council (EIS-GCC) and Election Infrastructure Subsector Coordinating Council (EI-SCC) Joint MDM Working Group. The Joint MDM Working Group was launched after the 2020 election by the EIS-GCC and EI-SCC and provides a forum through which the subsector can identify challenges in countering MDM and produce resources for addressing such challenges. The Joint MDM Working Group has convened meetings on, or about May 5, 2021; June 7, 2021; September 14, 2021; November 19, 2021, June 30, 2022, and August 4, 2022.

Common Interrogatory No. 5:

Identify all Communications with any Social-Media Platform that contain any of the Search Term(s).

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants further object to this Interrogatory as unduly burdensome, overbroad, and not proportional to the needs of this case. This Interrogatory calls for a response based on any and all specified documents from any Defendant or any employee or subordinate of any Defendant. Defendants cannot conduct an exhaustive search to uncover all possible responsive information under the current, abbreviated expedited discovery schedule. Such expedited discovery is especially burdensome given that Defendants' motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Furthermore, this Interrogatory covers documents that are not relevant to Plaintiffs' claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning "the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications." ECF No. 34 at 13. This Interrogatory, however, seeks information that contains

any of Plaintiffs' Search Terms, regardless of whether that document pertains to Misinformation. Plaintiffs' Search Terms include many broad terms that could be found in e-mails that have nothing to do with misinformation—such as “mask,” “election,” “antitrust,” “globalization,” and “Federalist.” Defendants also understand this Interrogatory to seeks a response based on only communications between Defendants and third parties outside the government. To the extent that this Interrogatory seeks internal information referring to such communications, Defendants object to the Interrogatory as not proportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery and would be unnecessary in light of Defendants' agreement to produce the external communications themselves. Defendants also object to the Interrogatory to the extent a response requires review of internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to agency communications. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, presidential communications privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44. Moreover, this Interrogatory is overbroad, unduly burdensome, and disproportional to the needs of the case, insofar as it purports to require a response from each agency concerning components of the agency or concerning governmental entities outside the agency whose actions are not challenged in the Complaint or Amended Complaint and whose information is not reasonably available to the agency or agency component whose alleged conduct is challenged in the Complaint or Amended Complaint.

Further, Defendants object to this Interrogatory on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportional to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.*, Order, *Centro Presente*, No. 1:18-cv-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d 1180, 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. That burden is especially undue at this stage of the litigation given that Defendants’ motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Additionally, Defendants object to this Interrogatory to the extent a response requires review of information protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such information, the request imposes a burden on Defendant disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-privileged information. *See Cheney*, 542 U.S. at 389.

Additionally, Defendants object to this Interrogatory as overbroad and disproportional to the needs of the case, particularly in light of the expedited nature of the discovery, to the extent “communication” is meant to cover anything beyond e-mail exchanges.

Defendants further object to this Interrogatory as unreasonably cumulative and duplicative of Plaintiffs’ Requests for Production 2 and 3, in response to which Defendants are producing non-privileged e-mail communications between Defendants and employees of the “Social-Media Platforms” concerning Misinformation located within a review population consisting of e-mail files that (i) are collected from custodians who, having been identified through Defendants’

internal inquiry, are known to have communicated with employees of the Social-Media Platforms, and (ii) contain one or more reasonable search terms calculated to identify which of the communications identified in (i) relate to Misinformation. Those Requests for Production provide a more expeditious and significantly less burdensome method for Plaintiffs to obtain the information sought, considering the expedited nature of the discovery here and the broad scope of this Interrogatory.

RESPONSE: Subject to and without waiving the above objections, the agency Defendants, HHS, NIAID, CDC, DHS, and CIS, respond and refer Plaintiffs to the documents being produced in response to Plaintiffs' First Requests For Production to Defendants.

Additional Interrogatory No. 1 (HHS No. 6):

Identify all “members of our senior staff” and/or “members of our COVID-19 team” who are “in regular touch with ... social media platforms,” as Jennifer Psaki stated at a White House press briefing on or around July 15, 2021, including all Communications relating to such coordination.

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants further object to this Interrogatory as vague because it relies on a characterization of a statement made by an individual no longer in government, and the statement does not specify the individuals at issue or the specific communications referred to. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44. Moreover, this Interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the case, insofar as it purports to require a response concerning components of the agency or concerning

governmental entities outside the agency whose actions are not challenged in the Complaint or Amended Complaint and whose information is not reasonably available to the agency or agency component whose alleged conduct is challenged in the Complaint or Amended Complaint.

Additionally, Defendants object to this Interrogatory as overbroad and disproportional to the needs of the case, particularly in light of the expedited nature of the discovery, to the extent “communication” is meant to cover anything beyond e-mail exchanges.

Further, Defendant objects to this Interrogatory as unreasonably cumulative and duplicative of Common Interrogatories 1 through 5. Defendants otherwise refer Plaintiffs to the documents being produced with these responses for any additional information.

RESPONSE: Subject to and without waiving the above objections, Defendants provide the following responses for Defendant HHS, responding through OSG, NIAID, and CDC, each of which refers to its response to Common Interrogatories 1 through 5 and the accompanying documents, *see generally* Fed. R. Civ. P. 33(d).

Additional Interrogatory No. 2 (HHS No. 7):

Identify all Communications with any Social-Media Platform relating to the “12 people who are producing 65 percent of anti-vaccine misinformation on social media platform,” as stated by Jennifer Psaki at the July 15, 2021 press briefing.

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants further object to this Interrogatory as vague because it relies on a characterization of a statement made by an individual no longer in government, and the statement does not specify the individuals at issue or the specific communications referred to. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject

outside the administrative record. *Lorion*, 470 U.S. at 743-44. Moreover, this Interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the case, insofar as it purports to require a response concerning components of the agency or concerning governmental entities outside the agency whose actions are not challenged in the Complaint or Amended Complaint and whose information is not reasonably available to the agency or agency component whose alleged conduct is challenged in the Complaint or Amended Complaint.

Additionally, Defendants object to this Interrogatory as overbroad and disproportional to the needs of the case, particularly in light of the expedited nature of the discovery, to the extent “communication” is meant to cover anything beyond e-mail exchanges.

Further, Defendant objects to this Interrogatory as unreasonably cumulative and duplicative of Common Interrogatories 1 through 5. Defendants otherwise refer Plaintiffs to the documents being produced with these responses for any additional information.

RESPONSE: Subject to and without waiving any of the foregoing objections, and based on a reasonable inquiry under the circumstances of the abbreviated, expedited discovery, HHS has identified OSG and CDC as available sources of information that is potentially responsive to this Interrogatory.

OSG. Subject to and without waiving the above objections, and based on a reasonable inquiry under the circumstances of abbreviated, expedited discovery, OSG refers to its response to Common Interrogatories 1 through 5 and the accompanying documents. *See generally* Fed. R. Civ. P. 33(d).

CDC. Subject to and without waiving the above objections, and based on a reasonable inquiry under the circumstances of abbreviated, expedited discovery, CDC refers to its response to Common Interrogatories 1 through 5 and the accompanying documents. *See generally* Fed. R.

Civ. P. 33(d).

Additional Interrogatory No. 3 (HHS No. 8):

Identify all “government experts” who are federal officers, officials, agents, employees, or contractors, who have “partnered with” Facebook or any other Social-Media Platform to address Misinformation and/or Content Modulation, including all Communications between such “government expert(s)” and any Social-Media Platform.

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants further object to this Interrogatory as vague because it relies on a characterization of a statement attributed to a third-party Facebook, as reported in a July 15, 2021 *Reuters.com* article quoted at Compl. ¶ 163, and the statement does not sufficiently specify the individuals at issue or the specific communications referred to. Defendants lack information sufficient to establish the meaning of that third party’s statement, including terms such as “partnered with.” Defendants further object to this Interrogatory as unduly burdensome and not proportional to the needs of the case. Defendants cannot conduct an exhaustive search to uncover all possible responsive information under the current, abbreviated expedited discovery schedule. Such expedited discovery is especially burdensome given that Defendants’ motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Defendants also object to the Interrogatory to the extent a response requires review of internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to agency communications. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44. Moreover, this Interrogatory is

overbroad, unduly burdensome, and disproportionate to the needs of the case, insofar as it purports to require a response concerning components of the agency or concerning governmental entities outside the agency whose actions are not challenged in the Complaint or Amended Complaint and whose information is not reasonably available to the agency or agency component whose alleged conduct is challenged in the Complaint or Amended Complaint.

Additionally, Defendants object to this Interrogatory as overbroad and disproportional to the needs of the case, particularly in light of the expedited nature of the discovery, to the extent “communication” is meant to cover anything beyond e-mail exchanges.

Further, Defendant objects to this Interrogatory as unreasonably cumulative and duplicative of Common Interrogatories 1 through 5. Defendants otherwise refer Plaintiffs to the documents being produced with these responses for any additional information.

RESPONSE: Subject to and without waiving the above objections, HHS has identified OSG, NIAID, and CDC as available sources of information that is potentially responsive to this Interrogatory.

OSG. Subject to and without waiving the above objections, and based on a reasonable inquiry under the circumstances of abbreviated, expedited discovery, OSG refers to its response to Common Interrogatories 1 through 5 and the accompanying documents. *See generally* Fed. R. Civ. P. 33(d).

NIAID. Subject to and without waiving the above objections, and based on a reasonable inquiry under the circumstances of abbreviated, expedited discovery, NIAID refers to its response to Common Interrogatories 1 through 5 and the accompanying documents. *See generally* Fed. R. Civ. P. 33(d).

CDC. Subject to and without waiving the above objections, and based on a reasonable inquiry under the circumstances of abbreviated, expedited discovery, CDC refers to its response to Common Interrogatories 1 through 5 and the accompanying documents. *See generally* Fed. R. Civ. P. 33(d).

Additional Interrogatory No. 4 (CDC No. 7):

Identify all “government experts” who are federal officers, officials, agents, employees, or contractors, who have “partnered with” Facebook or any other Social-Media Platform to address Misinformation and/or Content Modulation, including all Communications relating to such partnerships.

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants further object to this Interrogatory as vague because it relies on a characterization of a statement attributed to a third-party, Facebook, as reported in a July 15, 2021 *Reuters.com* article quoted at Compl. ¶ 163, and the statement does not sufficiently specify the individuals at issue or the specific communications referred to. Additionally, Defendants lack information sufficient to establish the meaning of that third party’s statement. Defendants further object to this Interrogatory as unduly burdensome and not proportional to the needs of the case. Defendants cannot conduct an exhaustive search to uncover all possible responsive information under the current, abbreviated expedited discovery schedule. Such expedited discovery is especially burdensome given that Defendants’ motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Defendant also objects to this Interrogatory as overbroad because it seeks information that is not relevant to Plaintiffs’ claims and that does not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social

media, including the nature and content of those communications.” ECF No. 34 at 13. This Interrogatory appears to seek information concerning communications with Social-Media Platforms regardless whether they pertain to content moderation with respect to misinformation. Defendants also object to the Interrogatory to the extent a response requires review of internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to agency communications. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44. Moreover, this Interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the case, insofar as it purports to require a response concerning components of the agency or concerning governmental entities outside the agency whose actions are not challenged in the Complaint or Amended Complaint and whose information is not reasonably available to the agency or agency component whose alleged conduct is challenged in the Complaint or Amended Complaint.

Additionally, Defendants object to this Interrogatory as overbroad and disproportional to the needs of the case, particularly in light of the expedited nature of the discovery, to the extent “communication” is meant to cover anything beyond e-mail exchanges.

Further, Defendant objects to this Interrogatory as unreasonably cumulative and duplicative of Common Interrogatories 1 through 5. Defendants otherwise refer Plaintiffs to the documents being produced with these responses for any additional information.

RESPONSE: Subject to and without waiving the above objections, and based on a reasonable inquiry under the circumstances of abbreviated, expedited discovery, CDC refers to its

response to Common Interrogatories 1 through 5 and the accompanying documents. *See generally* Fed. R. Civ. P. 33(d).

Additional Interrogatory No. 5 (Dr. Fauci No. 8):

Identify all Communications with Mark Zuckerberg from January 1, 2020 to the present, including but not limited to those referenced in Paragraphs 142-145 of the Complaint.

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants further object to this Interrogatory as overbroad because it seeks information that is not relevant to Plaintiffs' claims and that does not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning "the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications." ECF No. 34 at 13. This Interrogatory calls for a response based on all Communications with Mark Zuckerberg, regardless of whether they concern Misinformation. Defendants also understand this Interrogatory to seek only communications between Defendants and third parties outside the government. To the extent that this Interrogatory seeks a response based on internal information referring to such communications, the Interrogatory would be even more disproportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery and would be unnecessary in light of Defendants' agreement to produce the external communications themselves. Defendants also object to the Interrogatory to the extent a response requires review of internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to agency communications. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security

privilege, presidential communications privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44.

Further, Defendants objects to this Interrogatory to the extent it seeks information from Dr. Fauci based on his role as Chief Medical Advisor to the President, on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportional to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.*, Order, *Centro Presente*, No. 1:18-cv-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d 1180, 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. That burden is especially undue at this stage of the litigation given that Defendants' motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Additionally, Defendants object to this Interrogatory to the extent it a response requires review of information protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such documents, the Interrogatory imposes a burden on Defendants to locate documents and review them that is disproportional to the minimal benefit (if any) that Plaintiffs might derive from the possibility of an Interrogatory response based on responsive non-privileged documents. *See Cheney*, 542 U.S. at 389. Defendants, however, aver that Dr. Fauci does not have a White House e-mail address and have provided responses, subject to any other objections, in his capacity as Director of NIAID.

Additionally, Defendants object to this Interrogatory as overbroad and disproportional to

the needs of the case, particularly in light of the expedited nature of the discovery, to the extent “communication” is meant to cover anything beyond e-mail exchanges.

Further, Defendant objects to this Interrogatory as unreasonably cumulative and duplicative of Common Interrogatories 1 through 5.

RESPONSE: Subject to and without waiving the above objections, and based on a reasonable inquiry under the circumstances of abbreviated, expedited discovery, NIAID responds on behalf of **NIAID 1**, and refers to NIAID’s responses to Common Interrogatories 1 through 5 and the accompanying documents. *See generally* Fed. R. Civ. P. 33(d).

Additional Interrogatory No. 6 (Dr. Fauci No. 9):

Identify all Communications with any Social-Media Platform that relate to the Great Barrington Declaration, the authors of the Great Barrington Declaration, the original signers of the Great Barrington Declaration, Dr. Jay Bhattacharya, Dr. Martin Kulldorff, Dr. Aaron Kheriaty, Dr. Sunetra Gupta, Dr. Scott Atlas, Alex Berenson, Dr. Peter Daszak, Dr. Shi Zhengli, the Wuhan Institute of Virology, EcoHealth Alliance, and/or any member of the so-called “Disinformation Dozen.”

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants further object to this Interrogatory as vague because it does not define what the “Great Barrington Declaration” is or who the “Disinformation Dozen” are. Defendants further object to this Interrogatory as unduly burdensome and not proportional to the needs of the case. Defendants cannot conduct an exhaustive search to uncover all possible responsive information under the current, abbreviated expedited discovery schedule. Such expedited discovery is especially burdensome given that Defendants’ motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Defendants also object to this Interrogatory as overbroad because it requests information that does not fall within the scope of discovery authorized by the Court. The Court authorized the service of discovery requests

concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. This Interrogatory seeks information concerning, *inter alia*, the Great Barrington Declaration, its authors, its original signers, and any member of the “Disinformation Dozen,” regardless whether the Communications sought concern Misinformation. Defendants also understand this Interrogatory to seek only a response based on communications between Defendants and third parties outside the Government. Defendants also object to the Interrogatory to the extent a response requires review of internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to agency communications. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, presidential communications privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44.

Further, Defendants object to this Interrogatory to the extent it seeks information from Dr. Fauci based on his role as Chief Medical Advisor to the President, on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportional to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.*, Order, *Centro Presente*, No. 1:18-cv-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d 1180, 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers.

See Cheney, 542 U.S. at 385. That burden is especially undue at this stage of the litigation given that Defendants’ motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Additionally, Defendants object to this Interrogatory to the extent it a response requires review of information protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such documents, the Interrogatory imposes a burden on Defendants to locate documents and review them that is disproportional to the minimal benefit (if any) that Plaintiffs might derive from the possibility of an Interrogatory response based on responsive non-privileged documents. *See Cheney*, 542 U.S. at 389.

Additionally, Defendants object to this Interrogatory as overbroad and disproportional to the needs of the case, particularly in light of the expedited nature of the discovery, to the extent “communication” is meant to cover anything beyond e-mail exchanges.

Further, Defendant objects to this Interrogatory as unreasonably cumulative and duplicative of Common Interrogatories 1 through 5.

RESPONSE: Subject to and without waiving the above objections, and based on a reasonable inquiry under the circumstances of abbreviated, expedited discovery, NIAID responds on behalf of **NIAID 1**, and refers to NIAID’s responses to Common Interrogatories 1 through 5 and the accompanying documents. *See generally* Fed. R. Civ. P. 33(d).

Additional Interrogatory No. 7 (Dr. Fauci No. 10):

Identify all Communications between any member of the White House Communications Team and any Social-Media Platform that refer or relate to Misinformation and/or Content Modulation.

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative

process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, presidential communications privilege, or any other applicable privilege. Defendants further object to this Interrogatory to the extent it seeks information from Dr. Fauci based on his role as Chief Medical Advisor to the President, on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportional to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. See, e.g., Order, *Centro Presente*, No. 1:18-cv-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d 1180, 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. That burden is especially undue at this stage of the litigation given that Defendants' motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Additionally, Defendants object to this Interrogatory to the extent it seeks information protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Defendants, however, aver that Dr. Fauci does not have a White House e-mail address and have provided responses, subject to any other objections, in his capacity as Director of NIAID.

Additionally, Defendants object to this Interrogatory as overbroad and disproportional to the needs of the case, particularly in light of the expedited nature of the discovery, to the extent "communication" is meant to cover anything beyond e-mail exchanges.

Further, Defendant objects to this Interrogatory as unreasonably cumulative and duplicative of Common Interrogatories 1 through 5.

RESPONSE: Subject to and without waiving the above objections, and based on a reasonable inquiry under the circumstances of abbreviated, expedited discovery, NIAID responds on behalf of **NIAID 1**, and refers to NIAID's responses to Common Interrogatories 1 through 5 and the accompanying documents. *See generally* Fed. R. Civ. P. 33(d).

Additional Interrogatory No. 8 (DHS No. 6):

Define what is an “Analytic Exchange” with Twitter or any other Social-Media Platform, and identify any existing “Analytic Exchanges,” including all participant(s) in such Analytic Exchange(s).

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants object to this Interrogatory as overbroad and disproportional to the needs of the case because it calls for information that is not relevant to Plaintiffs' claims and that do not fall within the scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. This Interrogatory asks Defendants to define “Analytic Exchange(s),” and identify any such “Analytic Exchange(s),” regardless whether those communications pertain to Misinformation. Defendants also object to the Interrogatory to the extent a response requires review of internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to agency communications. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44.

RESPONSE: Subject to and without waiving the above objections, Defendant DHS responds as follows: DHS has not defined the term ‘Analytic Exchange’ as a matter of departmental policy. For purposes of this response, DHS defines the term as an arrangement between DHS and external entities under which the participants exchange information and analysis regarding threats or vulnerabilities relating to homeland security on a periodic basis.

The DHS Office of Intelligence and Analysis participates in a number of Analytic Exchanges, including one where Misinformation is a topic of interest. Specifically, the Office of Intelligence and Analysis, on behalf of the Office of the Director of National Intelligence, sponsors the Public-Private Analytic Exchange Program (“AEP”). The AEP facilitates collaborative partnerships between members of the private sector and teams of experienced U.S. government analysts to form a number of subcommittees. This annual program provides U.S. government analysts and private sector partners with a better understanding of select national security and homeland security issues.

There are approximately 100 participants in the AEP. Each year, teams of analysts drawn from the AEP participants work virtually over six months to develop unclassified intelligence products made available to the public. Among the topics to be addressed by the AEP this year are “Countering Foreign Malign Social Network Manipulation in the Homeland,” “Addressing Risks From Non-State Actors’ Use of Commercially Available Technologies,” and “Phase II: Increasing Threats of Deepfake Identities.” All three of these topics are expected to address Misinformation in some form. Finished products for all of the AEP 2022 topics will be presented at the AEP Concluding Summit scheduled for August 30–31 and will be made available on the DHS website: <https://www.dhs.gov/aep-deliverables>.

Additional Interrogatory No. 9 (DHS No. 7):

Identify all participants and topics of discussion in the “series of monthly meetings between the government and tech companies” prior to the 2020 election, as discussed in Paragraphs 182-184 of the Complaint.

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants further object to this Interrogatory as vague because it relies on a characterization of statements made by third-party companies, rather than any Defendant, as reported in an August 12, 2020 *NBC News.com* article cited at Compl. ¶ 180, and the statements do not provide sufficient details of the meetings to which the Interrogatory refers. Defendants also object to this Interrogatory as unduly burdensome and not proportional to the needs of the case. This Interrogatory calls for information about meetings that occurred before the current President took office. Defendants also object to this Interrogatory as overbroad and disproportional to the needs of the case because it calls for information that is not relevant to Plaintiffs’ claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. Defendants also object because the undefined term “tech companies” as used in this Interrogatory is vague and ambiguous. This Interrogatory appears to call for information relating to certain meetings with technology companies that occurred prior to the 2020 election, regardless whether those meetings were with Social-Media Platforms and pertained to Misinformation. Defendants also object to the Interrogatory to the extent a response requires review of internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to agency communications. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law

enforcement privilege, a statutory national security privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44.

RESPONSE: Subject to and without waiving the above objections, Defendant DHS responds as follows: The “series of monthly meetings between the government and tech companies” relates to a recurring meeting with federal government officials and the private industry, and the participants and topics of discussion have evolved over time. Government participants have included various representatives from CISA, DHS’s Office of Intelligence and Analysis, the FBI’s Foreign Influence Task Force, the Justice Department’s National Security Division, and the Office of the Director of National Intelligence. Industry participants have included representatives from Google, Facebook, Twitter, Reddit, Microsoft, Verizon Media, Pinterest, LinkedIn and the Wikimedia Foundation. The topics discussed include, but are not limited to: information sharing around elections risk, briefs from industry, threat updates, and highlights and upcoming watch outs. DHS refers to its responses to Common Interrogatories 1 through 5 and the accompanying documents, *see generally* Fed. R. Civ. P. 33(d), for information about individual meeting invitations and agendas.

Additional Interrogatory No. 10 (DHS No. 8):

Identify all “private firms” that DHS has “partnered” with, or planned, intended, or discussed “partnering” with, to “monitor” online content, as discussed in Paragraph 202 of the Complaint, including the nature of the “partnership” and the nature of any “outsourcing [of] information gathering to outside firms.”

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants further object to this Interrogatory because it seeks information that is not relevant to Plaintiffs’ claims and does not fall within the scope of discovery authorized by the Court. The Court

authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. This Interrogatory would require identification of outside “private firms” rather than identification of federal officials; and it would require describing the nature of any “planned, intended, or discussed ‘partnerships’” rather than the nature and content of communications with social-media platforms. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44.

Defendants also object to the Interrogatory to the extent a response requires review of internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to agency communications. Defendants also object to this Interrogatory as “vague” because it does not define what constitutes a “private firm,” or what is meant by “partner,” “monitor,” or “outsourcing” information gathering. Defendants also object to this Interrogatory as overbroad because it calls for identification of every “private firm” that DHS may have “planned, intended, or discussed” partnering with.

RESPONSE: Subject to and without waiving the above objections, Defendant DHS responds as follows: As DHS responded in the news article Plaintiffs cited to in support of the allegations in the Complaint to which this Interrogatory refers, DHS “is not partnering with private firms to surveil suspected domestic terrorists online.”
<https://www.cnn.com/2021/05/03/politics/dhs-partner-private-firms-surveil-suspected-domestic->

terrorists/index.html. DHS does not partner with “private firms” to “to evade legal, constitutional, and ethical problems with DHS’s direct surveillance of online speech.”.

Additional Interrogatory No. 11 (DHS No. 9):

Identify all “the tech companies” with which DHS is “working together” to “prevent harm from occurring,” as Secretary Mayorkas stated on August 2, 2021, as discussed in Paragraph 207-208 of the Complaint, including the nature of the work and all Communication(s) relating to such work.

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants also object because the undefined term “tech companies” as used in this Interrogatory is vague and ambiguous. Even assuming that the term “tech companies” is the same as the term “Social-Media Platform[s]” as defined by Plaintiffs, Defendants further object to this Interrogatory as unduly burdensome and not proportional to the needs of the case. Defendants cannot conduct an exhaustive search to uncover all possible responsive information under the current, abbreviated expedited discovery schedule. Such expedited discovery is especially burdensome given that Defendants’ motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Defendants also object to this Interrogatory as overbroad because it seeks information that is not relevant to Plaintiffs’ claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. This Interrogatory appears to seek information relating to efforts to work with private “tech” companies to “prevent harm from occurring,” regardless of whether those efforts pertained to Misinformation. Defendants also object to the Interrogatory to the extent a response requires review of internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to

agency communications. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44.

Additionally, Defendants object to this Interrogatory as overbroad and disproportional to the needs of the case, particularly in light of the expedited nature of the discovery, to the extent “communication” is meant to cover anything beyond e-mail exchanges.

Further, Defendant objects to this Interrogatory as unreasonably cumulative and duplicative of Common Interrogatories 1 through 5. Defendants otherwise refer Plaintiffs to the documents being produced with these responses for any additional information.

RESPONSE: Subject to and without waiving the above objections, DHS refers to its response to Common Interrogatories 1 through 5 and the accompanying documents, *see generally* Fed. R. Civ. P. 33(d), and further responds as follows: Consistent with the Department’s mission to protect the homeland, DHS responds to Misinformation that poses a threat to the homeland. It identifies Misinformation that poses a threat to the homeland through publicly available sources, research conducted by academic and other institutions, and information shared by other federal agencies and partners. DHS then shares factual information related to its mission and about which it has expertise to potentially impacted people and organizations.

Additional Interrogatory No. 12 (DHS No. 13):

Identify every federal agency, group, sub-group, department, component, division, sub-division, officer, official, employee, agent, or other person or entity within the federal government, both within and without DHS, that communicates or has communicated with any Social-Media Platform regarding Misinformation and/or Content Modulation, including but not limited to any person or entity whose activity is or was to be subject to oversight by the Disinformation Governance Board, including the nature of their coordination with the Social-Media Platform(s).

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants further object to this Interrogatory as overbroad and unduly burdensome to the extent it seeks identification of every “person or entity within the federal government,” including those “without DHS,” that “communicates or has communicated with any Social-Media Platform.” This Interrogatory appears to call on Defendants to exceed the information reasonably available to them and thus goes beyond the scope of Rules 26 and 33. Even if such an Interrogatory were proper as to the conduct of the named Defendants, it would still be overbroad and disproportional to the needs of the case to the extent it seeks information about any agency that is not a Defendant in this action. Defendants further object to this Interrogatory as overbroad and cumulative to the extent it seeks information requested in earlier interrogatories, in particular Interrogatory 1, that also seek identification of individuals who have communicated with or are communicating with a social-media platform regarding Misinformation. Defendants additionally object to this Interrogatory as vague because it does not define what constitutes “coordination.” Defendants also object to this Interrogatory as overbroad and unduly burdensome to the extent it seeks a description of “the nature of . . . coordination” between any and all “person[s] or entit[ies] within the federal government” and a “Social-Media Platform.” Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to

discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44. Moreover, this Interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the case, insofar as it purports to require a response concerning components of the agency or concerning governmental entities outside the agency whose actions are not challenged in the Complaint or Amended Complaint and whose information is not reasonably available to the agency or agency component whose alleged conduct is challenged in the Complaint or Amended Complaint.

Additionally, Defendants object to this Interrogatory as overbroad and disproportional to the needs of the case, particularly in light of the expedited nature of the discovery, to the extent “communication” is meant to cover anything beyond e-mail exchanges.

Further, Defendant objects to this Interrogatory as unreasonably cumulative and duplicative of Common Interrogatories 1 through 5. Defendants otherwise refer Plaintiffs to the documents being produced with these responses for any additional information.

RESPONSE: Subject to and without waiving any of the foregoing objections, DHS responds as follows: DHS components lead on operational efforts to counter Misinformation in their relevant mission spaces. Within DHS HQ, personnel from within DHS’s Office of Intelligence & Analysis, Office of Strategy, Policy, and Plans, Office of Public Affairs, and Disinformation Governance Board have communicated with Social-Media Platforms regarding Misinformation.

Additional Interrogatory No. 13 (DHS No. 14):

Identify every federal agency, group, sub-group, department, component, division, sub-division, officer, official, employee, agent, or other person or entity within DHS that is involved in “counter-disinformation efforts” and, as part of those efforts, communicates or has communicated with any Social-Media Platform, including the nature of such “counter-disinformation efforts.”

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants

also object because the undefined term “counter-disinformation efforts” is vague, and ambiguous. Defendants further object to this Interrogatory because it seeks information that is not relevant to Plaintiffs’ claims and does not fall within the scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. This Interrogatory, however, also asks Defendants to describe “the nature of . . . ‘counter-disinformation efforts,’” independent of any communications with social media platforms and thus goes beyond the scope of discovery authorized by the Court. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44. Moreover, this Interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the case, insofar as it purports to require a response concerning components of the agency or concerning governmental entities outside the agency whose actions are not challenged in the Complaint or Amended Complaint and whose information is not reasonably available to the agency or agency component whose alleged conduct is challenged in the Complaint or Amended Complaint.

Additionally, Defendants object to this Interrogatory as overbroad and disproportional to the needs of the case, particularly in light of the expedited nature of the discovery, to the extent “communication” (“communicates or has communicated”) is meant to cover anything beyond e-mail exchanges.

Further, Defendant objects to this Interrogatory as unreasonably cumulative and duplicative of Common Interrogatories 1 through 5. Defendants otherwise refer Plaintiffs to the documents being produced with these responses for any additional information.

RESPONSE: Subject to and without waiving the above objections, DHS responds as follows: DHS components lead on operational efforts to counter Misinformation in their relevant mission spaces. Within DHS HQ, personnel from within DHS's Office of Intelligence & Analysis, Office of Strategy, Policy, and Plans, and Disinformation Governance Board have communicated with Social-Media Platforms regarding Misinformation. The nature of DHS's work is that it identifies Misinformation that threatens the homeland through publicly available sources, research conducted by academic and other institutions, and information shared by other federal agencies and partners. DHS then shares factual information related to its mission to potentially impacted people and organizations.

Additional Interrogatory No. 14 (Jankowicz No. 9):

Identify the nature, purpose, participants, topics to be discussed, and topics actually discussed at the meeting between DHS personnel and Twitter executives Nick Pickles and Yoel Roth scheduled on or around April 28, 2022.

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants further object to this Interrogatory as unduly burdensome and not proportional to the needs of the case. Defendants cannot conduct an exhaustive search to uncover all possible responsive information under the current, abbreviated expedited discovery schedule. Such expedited discovery is especially burdensome given that Defendants' motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Defendants also objects to this Interrogatory as overbroad because it information that is not relevant to Plaintiffs' claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests

concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. This Interrogatory appears to call for information relating to a specific meeting with two identified employees of Social-Media Platforms, or “any similar meeting with [any other] personnel associated with any Social-Media Platform,” regardless whether those communications pertain to Misinformation. Defendants also object to the Interrogatory to the extent a response requires review of internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to agency communications. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44.

RESPONSE: Subject to and without waiving the above objections, Defendant DHS responds on behalf of **DHS 1**, and responds as follows: The April 28, 2022 meeting between DHS personnel and Twitter executives **Twitter 7** and **Twitter 8** did not occur.

Additional Interrogatory No. 15 (Ms. Easterly No. 8):

Identify every working group, “analytic exchange,” task force, joint government-private enterprise, or similar formal or informal arrangement that involves federal official(s) communicating with any Social-Media Platform(s) about Content Modulation and/or Misinformation, including all participants in such groups.

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants further object to this Interrogatory as vague because it does not define key terms, including “working group” and “arrangement.” Defendants further object to this Interrogatory as unduly

burdensome and not proportional to the needs of the case. This Interrogatory calls for a response based on any and all specified communications (“arrangement . . . communicating”) from any Defendant or any employee or subordinate of any Defendant. Defendants cannot conduct an exhaustive search to uncover all possible responsive information under the current, abbreviated expedited discovery schedule. Location of information about every “federal official” communicating with “any Social-Media Platform[.]” would require a search that is not feasible under the current, abbreviated expedited discovery schedule. Defendants also object to the Interrogatory to the extent a response requires review of internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to agency communications. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44. Moreover, this Interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the case, insofar as it purports to require a response concerning components of the agency or concerning governmental entities outside the agency (“federal official(s)”) whose actions are not challenged in the Complaint or Amended Complaint and whose information is not reasonably available to the agency or agency component whose alleged conduct is challenged in the Complaint or Amended Complaint.

Additionally, Defendants object to this Interrogatory as overbroad and disproportionate to the needs of the case, particularly in light of the expedited nature of the discovery, to the extent “communicating” is meant to cover anything beyond e-mail exchanges.

Further, Defendant objects to this Interrogatory as unreasonably cumulative and duplicative

of Common Interrogatories 1 through 5. Defendants otherwise refer Plaintiffs to the documents being produced with these responses for any additional information.

RESPONSE: Subject to and without waiving the above objections, Defendant CISA responds on behalf of **CISA 1**, and refers to the response to Common Interrogatories 1 through 5 and the accompanying documents, *see generally* Fed. R. Civ. P. 33(d), and further responds as follows:

Working groups, “analytic exchanges,” task forces, joint government-private enterprises, or similar formal or informal arrangements that involve CISA officials communicating with Social-Media Platforms about Misinformation, include, but are not limited to:

- CISA’s Mis-, Dis-, and Malinformation (MDM) team, formerly known as the CFITF. The CFITF was established in May 2018 in CISA’s predecessor agency. The CFITF was charged with helping the American people understand the risks from MDM and how citizens can play a role in reducing the impact of MDM on their organizations and communities. In 2021, the CFITF officially transitioned to CISA’s MDM team, and the mission evolved to reflect the changing information environment. The MDM team continues to work in close coordination with interagency and private sector partners, social media companies, academia, and international partners on a variety of projects to build resilience against malicious information activities.
- A recurring engagement between USG – Industry, as described in response to Common Interrogatory No. 4.
- CISA CSAC, including the Protecting Critical Infrastructure from Misinformation and Disinformation Subcommittee, as described in response to [Interrogatory No. 4]. Additional information about the CSAC is available on CISA’s website,

<https://www.cisa.gov/cisa-cybersecurity-advisory-committee>.

- The EIS-GCC and EI-SCC Joint MDM Working Group, as described in response to Common Interrogatory No. 4.

Additional Interrogatory No. 16 (Ms. Easterly No. 10):

Identify every instance in which CISA’s “MDM team” has “serve[d] as a switchboard for routing disinformation concerns to appropriate social media platforms,” as stated in Your April 12, 2022 bulletin, including all Communication(s) related to such instance.

OBJECTIONS: Defendants incorporate by reference the above objections. Defendants further object to this Interrogatory as unduly burdensome and not proportional to the needs of the case. This Interrogatory calls Defendant to identify “every instance” in which CISA’s “MDM team” “rout[ed] disinformation concerns.” Defendants cannot conduct an exhaustive search to uncover all possible responsive information under the current, abbreviated expedited discovery schedule. Such expedited discovery is especially burdensome given that Defendants’ motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Defendants also object to the Interrogatory to the extent a response requires review of internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to agency communications. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44.

Additionally, Defendants object to this Interrogatory as overbroad and disproportional to the needs of the case, particularly in light of the expedited nature of the discovery, to the extent “communication” is meant to cover anything beyond e-mail exchanges.

Further, Defendant objects to this Interrogatory as unreasonably cumulative and duplicative of Common Interrogatories 1 through 5.

RESPONSE: Subject to and without waiving the above objections, Defendant CISA responds on behalf of **CISA 1**, and refers to the response to Common Interrogatories 1 through 5 and the accompanying documents, *see generally* Fed. R. Civ. P. 33(d).

Additional Interrogatory No. 17 (Ms. Jean-Pierre No. 6):

Identify all “members of our senior staff” and/or “members of our COVID-19 team” who are “in regular touch with ... social media platforms,” as [Jennifer Psaki] stated at a White House press briefing on or around July 15, 2021, including the nature of the communication and/or coordination.

OBJECTIONS: Defendant incorporates by reference the above objections. Defendant further objects to this Interrogatory on the ground that it is vague because it relies on a characterization of a statement made by an individual no longer in government, and the statement does not specify the individuals at issue or the specific communications referenced. Defendant further objects to this Interrogatory as unduly burdensome and not proportional to the needs of the case. This Request calls for a response based on *any and all* specified “communications” from Defendant or any employee or subordinate of Defendant. Defendants cannot conduct an exhaustive search to uncover all possible responsive information under the current, abbreviated expedited discovery schedule. Defendant also objects to this Interrogatory as overbroad because it calls for a response based on documents that are not relevant to Plaintiffs’ claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. This Interrogatory appears to call for a

response based on communications with Social-Media Platforms regardless of whether they pertain to content moderation with respect to misinformation. Defendant also objects to this Interrogatory to the extent it seeks internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to such communications. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, presidential communications privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44.

Further, Defendant objects to this Interrogatory on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportionate to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.*, Order, *Centro Presente*, No. 1:18-CV-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d 1180, 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. That burden is especially undue at this stage of the litigation given that Defendants' motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Additionally, Defendant objects to this request to the extent it is directed to information protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such information, the request imposes a burden on Defendant disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-privileged information. *See Cheney*, 542 U.S. at 389.

Further, Defendant objects to this Interrogatory as unreasonably cumulative and duplicative of Plaintiffs' Interrogatories 1 through 5, in response to which certain Defendants are producing documents as described herein.

Additional Interrogatory No. 18 (Ms. Jean-Pierre No. 7):

Identify all Communications with any Social-Media Platform relating to “12 people who are producing 65 percent of the anti-vaccine misinformation on social-media platforms,” as [Jennifer Psaki] stated at a White House press briefing on or around July 15, 2021.

OBJECTIONS: Defendant incorporates by reference the above objections. Defendant further objects to this Interrogatory on the ground that it is vague because it relies on a characterization of a statement made by an individual no longer in government, and the statement does not specify the individuals at issue or the specific communications referenced. Defendant further objects to this Interrogatory as unduly burdensome and not proportional to the needs of the case. This Interrogatory calls for a response based on any and all specified documents from Defendant or any employee or subordinate of Defendant. Defendants cannot conduct an exhaustive search to uncover all possible responsive information under the current, abbreviated expedited discovery schedule. Such expedited discovery is especially burdensome given that Defendants' motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Defendant also objects to this Interrogatory as overbroad because it calls for documents that are not relevant to Plaintiffs' claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. This Interrogatory appears to call for a response based on communications with Social-Media Platforms

regardless of whether they pertain to content moderation with respect to misinformation. Defendants also object to the Interrogatory to the extent a response requires review of internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to agency communications. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, presidential communications privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44.

Further, Defendant objects to this Interrogatory on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportionate to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.*, Order, *Centro Presente*, No. 1:18-CV-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d 1180, 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. That burden is especially undue at this stage of the litigation given that Defendants' motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Additionally, Defendant objects to this Interrogatory to the extent it is directed to information protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such information, the request imposes a burden on Defendant disproportionate to the minimal benefit

(if any) that Plaintiffs might derive from the possibility of responsive, non-privileged information. See *Cheney*, 542 U.S. at 389.

Further, Defendant objects to this Interrogatory as unreasonably cumulative and duplicative of Common Interrogatories 1 through 5, in response to which certain Defendants are producing documents as described herein.

Additional Interrogatory No. 19 (Ms. Jean-Pierre No. 8):

On or around July 15, 2021, You stated that “we engage with them [i.e., Social-Media Platforms] regularly and they certainly understand what our asks are.” Identify what Social-Media Platform(s) are included in any such engagement(s), and identify “what our asks are,” including Communication(s) relating to such engagement(s) and ask(s).

OBJECTIONS: Defendant incorporates by reference the above objections. Defendant further objects to this Interrogatory on the ground that it is vague because it relies on a characterization of a statement made by an individual no longer in government, and the statement does not specify the individuals at issue or the specific communications referenced. Defendant further objects to this Interrogatory as unduly burdensome and not proportional to the needs of the case. This Interrogatory calls for a response based on any and all specified documents from Defendant or any employee or subordinate of Defendant. Defendants cannot conduct an exhaustive search to uncover all possible responsive information under the current, abbreviated expedited discovery schedule. Such expedited discovery is especially burdensome given that Defendants’ motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Defendant also objects to this Interrogatory as overbroad because it calls for documents that are not relevant to Plaintiffs’ claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social

media, including the nature and content of those communications.” ECF No. 34 at 13. This Interrogatory appears to call for a response based on communications with Social-Media Platforms regardless of whether they pertain to content moderation with respect to misinformation. Defendants also object to the Interrogatory to the extent a response requires review of internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to agency communications. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, presidential communications privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44.

Further, Defendant objects to this Interrogatory on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportionate to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.*, Order, *Centro Presente*, No. 1:18-CV-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d 1180, 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. That burden is especially undue at this stage of the litigation given that Defendants’ motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Additionally, Defendant objects to this Interrogatory to the extent it is directed to information protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such

information, the request imposes a burden on Defendant disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-privileged information. *See Cheney*, 542 U.S. at 389.

Further, Defendant objects to this Interrogatory as unreasonably cumulative and duplicative of Common Interrogatories 1 through 5, in response to which certain Defendants are producing documents as described herein.

Additional Interrogatory No. 20 (Ms. Jean-Pierre No. 10):

Identify all person(s) who “engage[s] regularly with all social media platforms about steps that can be taken” to address Misinformation on social media, which engagement “has continued, and ... will continue,” as You stated at the April 25, 2022 White House press briefing, including all Communications with any Social-Media Platform involved in such engagement.

OBJECTIONS: Defendant incorporates by reference the above objections. Defendant further objects to this Interrogatory on the ground that it is vague because it relies on a characterization of a statement made by an individual no longer in government, and the statement does not specify the individuals at issue or the specific communications referenced. Defendant further objects to this Interrogatory as unduly burdensome and not proportional to the needs of the case. This Interrogatory calls for a response based on any and all specified documents from Defendant or any employee or subordinate of Defendant. Defendants cannot conduct an exhaustive search to uncover all possible responsive information under the current, abbreviated expedited discovery schedule. Such expedited discovery is especially burdensome given that Defendants’ motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Defendant also objects to this Interrogatory as overbroad because it calls for documents that are not relevant to Plaintiffs’ claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests

concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. This Interrogatory appears to call for a response based on communications with Social-Media Platforms regardless of whether they pertain to content moderation with respect to misinformation. Defendants also object to the Interrogatory to the extent a response requires review of internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to agency communications. Defendant also objects to this Request to the extent it seeks internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to such communications. Defendants also object to this Interrogatory to the extent it seeks information protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, presidential communications privilege, or any other applicable privilege. Additionally, challenges to administrative agency action are ordinarily not subject to discovery outside the administrative record. *Lorion*, 470 U.S. at 743-44.

Further, Defendant objects to this Interrogatory on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportionate to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.*, Order, *Centro Presente*, No. 1:18-CV-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d 1180, 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. That burden is especially undue at this stage of the litigation given

that Defendants' motion to dismiss the Amended Complaint for lack of subject-matter jurisdiction and other deficiencies is forthcoming. Additionally, Defendant objects to this Interrogatory to the extent it is directed to information protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such information, the request imposes a burden on Defendant disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-privileged information. *See Cheney*, 542 U.S. at 389.

Further, Defendant objects to this Interrogatory as unreasonably cumulative and duplicative of Common Interrogatories 1 through 5, in response to which certain Defendants are producing documents as described herein.

Dated: August 17, 2022

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

ERIC WOMACK
Assistant Director, Federal Programs Branch

ADAM D. KIRSCHNER
Senior Trial Counsel

/s/ Indraneel Sur

KYLA SNOW (Ohio Bar No. 96662)
INDRANEEL SUR (D.C. Bar No. 978017)
KUNTAL CHOLERA
Trial Attorneys
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L. Street, NW
Washington D.C. 20005
Tel: (202) 616-8488
Indraneel.Sur@usdoj.gov

Attorneys for Defendants

VERIFICATION

I, **OSG 2**, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the interrogatory response of the Office of the Surgeon General to Plaintiffs' First Set of Expedited Preliminary-Injunction Related Interrogatories dated July 18, 2022, Common Interrogatories Numbers 1-5 and Additional Interrogatories Numbers 1-3, contained in the Responses of the Office of the Surgeon General, is true and correct, to the best of my knowledge.

Dated: August 16, 2022

OSG 2

OSG 2

Chief of Staff

Office of the Surgeon General

VERIFICATION

I, **NIAID 5**, Ph.D., pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the interrogatory response of the National Institute of Allergy and Infectious Diseases to Plaintiffs' First Set of Expedited Preliminary-Injunction Related Interrogatories dated July 18, 2022, Common Interrogatories Numbers 1-5 and Additional Interrogatories Numbers 1, 3, and 5-7, contained in the Responses of the National Institute of Allergy and Infectious Diseases, is true and correct, to the best of my knowledge.

Dated: August 17, 2022

NIAID 5 Digitally signed by **NIAID 5**
-S
Date: 2022.08.17 19:48:01
-04'00'

NIAID 5, Ph.D.

Deputy Director for Science Management,
and Executive Officer

NIAID/NIH/DHHS

VERIFICATION

I, **CDC 1**, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the interrogatory response of the Centers for Disease Control and Prevention to Plaintiffs' First Set of Expedited Preliminary-Injunction Related Interrogatories dated July 18, 2022, Common Interrogatories Numbers 1-5 and Additional Interrogatories Numbers 1-4 contained in the Responses of the Centers for Disease Control and Prevention, is true and correct, to the best of my knowledge.

Dated: August 17, 2022

Digitally signed by
CDC 1 -S
Date: 2022.08.17
17:20:13 -04'00'

CDC 1

Health Communications Specialist
Director, Division of Digital Media, OADC
Centers for Disease Control and Prevention

Verification

I, **DHS 3**, hereby declare that I am the Acting Assistant Secretary of Homeland Security for Counterterrorism, Threat Prevention, and Law Enforcement Policy at the Department of Homeland Security. Based on reasonable inquiry and information provided to me in my official capacity, pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the information regarding the Department of Homeland Security contained in the Defendants' responses to Plaintiff's Common Interrogatories 1–5 and Additional Interrogatories 8–14 is true and correct to the best of my knowledge.

DHS 3

Digitally signed by **DHS 3**
Date: 2022.08.17 18:17:25
-0400'

DHS 3

Acting Assistant Secretary of Homeland Security for
Counterterrorism, Threat Prevention, and Law Enforcement Policy

Department of Homeland Security

VERIFICATION

I, **CISA 4** pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the interrogatory response of the Cybersecurity and Infrastructure Security Agency to Plaintiffs' First Set of Expedited Preliminary-Injunction Related Interrogatories dated July 18, 2022, Common Interrogatories Numbers 1-5 and Additional Interrogatories Numbers 15 and 16, contained in the Responses of the Cybersecurity and Infrastructure Security Agency, is true and correct, to the best of my knowledge.

Dated: August 16, 2022

CISA 4

Lead of Election Security & Resilience
Cybersecurity and Infrastructure Security Agency

From: [REDACTED]@fb.com]
Sent: 12/22/2021 2:38:01 PM
To: [REDACTED]@cdc.gov]
CC: [REDACTED]@fb.com]; [REDACTED]@fb.com]; [REDACTED]@cdc.gov]
Subject: Re: Crowd Tangle COVID-19 reports
Attachments: Content Insights Dec1 - Dec 14.pdf

Hi [REDACTED]

Attached, please find the latest CrowdTangle content insights report for the period of Dec 1 – Dec 14. You will find the summary from this report below:

Highly engaged COVID vaccine-related content [Slides 3-4] across public Pages features posts that illustrate the continued politicization of vaccine mandates and COVID-19 public health measures. Similarly, many posts with the highest interactions in public Groups share news of the Biden administration's federal vaccine policies, as well as climbing COVID-19 death rates among the anti-vaxx community. In this report, we will further explore highly engaged content within the following themes:

- **Vaccine Mandates for Businesses:** Federal, state, and local government have grappled with vaccine mandates for private employers, with the Senate most recently voting to overturn the Biden administration's federal policy for businesses. Top engaged posts also share breaking news of federal courts blocking or upholding various aspects of the federal vaccine mandates [Slides 5-6].
- **Breakthroughs and Boosters:** The CDC has released new guidance advising all adults over 18 to receive a booster COVID-19 vaccine as a means of better protection from the emerging Omicron variant. Highly engaged posts from news publishers and public figures echo this advice [Slides 7-8].
- **Fake Vaccinations:** Individuals are finding ways to avoid vaccine mandates by faking vaccination. This behavior has resulted in severe repercussions for those who have been caught, including criminal prosecution. Many highly engaged posts share news of an Italian who tried to use a fake arm to receive a vaccine [Slides 9-10].

As mentioned in our previous email, this marks our last insights report for this series. We're happy you found these reports useful. Thank you for being great partners, and we look forward to finding more opportunities to work together in the future.

Happy holidays!

Best,
[REDACTED]

 Meta

[REDACTED]

From: [REDACTED]@fb.com>
Sent: Thursday, December 9, 2021 8:36 AM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com> [REDACTED]@fb.com> [REDACTED]

[REDACTED]@cdc.gov>

Subject: Re: Crowd Tangle COVID-19 reports

Sorry about that! Attached here.

And thank you for the positive feedback!

From: [REDACTED]@cdc.gov>

Sent: Thursday, December 9, 2021 6:41 AM

To: [REDACTED]@fb.com>

Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]

[REDACTED]@cdc.gov>

Subject: RE: Crowd Tangle COVID-19 reports

[REDACTED] can you attach?

Thanks for all of these reports and I understand the ending of it. But they have ben helpful!! Much appreciated.

From: [REDACTED]@fb.com>

Sent: Tuesday, December 7, 2021 9:39 PM

To: [REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>

Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Attached, please find the latest CrowdTangle content insights report for the period of Nov 17 – Nov 30. You will find the summary from this report below:

Highly engaged COVID vaccine-related content [Slides 3-4] across Pages feature posts from President Biden and news outlets addressing the Omicron variant, as well as recent court ruling regarding the Biden Administration's vaccine mandates. Similarly, many posts with the highest interactions in public Groups share news of state bills and court rulings that are countering the federal vaccine mandates. In this report, we will further explore highly engaged content within the following themes:

- **Omicron Variant:** Top engaged posts share articles about the emergent Omicron variant, which was first documented in South Africa and has now been found in several countries across the world. Health experts and scientists are calling for greater vaccination efforts to fight against the variant [Slides 5-6].
- **Antiviral COVID-19 Pills:** The White House has recently announced that the US government has purchased 10 million treatments of Pfizer's antiviral COVID-19 pill. Many top engaged posts public posts discuss the benefits of the pill in hopefully reducing COVID-related hospitalizations [Slides 7-8].
- **Vaccine Mandates:** A recurring topic, many of the top engaged posts share recent court developments regarding the Biden administration's vaccine mandates. A federal judge has blocked Biden's vaccine mandate for healthcare workers in 10 states. On the state level, Florida has recently passed a law restricting employee vaccine mandates, which has affected companies like Disney World [Slides 9-10].

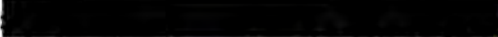

Also, please be aware that these reports will be discontinued in Jan 2022. The next report on December 21st will be our last COVID-19 content insights report.

If you have any questions, please feel free to reach out. And as always, please do not share.



Thank you,



Meta

From:  <[@cdc.gov](mailto: @cdc.gov)>
Sent: Wednesday, November 24, 2021 7:07 AM
To:  <[@fb.com](mailto: @fb.com)>
Subject: RE: Crowd Tangle COVID-19 reports

Thank you!

From:  <[@fb.com](mailto: @fb.com)>
Sent: Tuesday, November 23, 2021 1:46 PM
To:  <[@cdc.gov](mailto: @cdc.gov)>
Subject: Re: Crowd Tangle COVID-19 reports


Hi 

Attached, please find the latest CrowdTangle content insights report for the period of Nov 3 – Nov 16. You will find the summary from this report below:

Highly engaged COVID vaccine-related content [Slides 3-4] across Pages feature posts from news outlets and media pundits discussing conservative backlash against vaccine policies and advocacy. Similarly, many posts with the highest interactions in public Groups feature backlash against OSHA mandates that will lead to fines for businesses that fail to comply. In this report, we will further explore highly engaged content within the following themes:

- **“Right to Choose” - Calls for Medical Freedom:** The scandal involving Green Bay QB Aaron Rodgers’ vaccination status has fueled a movement amongst conservatives against vaccine mandates in favor of an individual’s right to choose their own healthcare. Top engaged posts feature articles from news publishers reporting State Farm’s and others defense of Aaron Rodgers’ right to choose not to get vaccinated against Covid-19 [Slides 5-6].
- **Federal vs. State Vaccine Policies:** Republican-governed states have formed coalitions against the Biden Administration’s Covid-19 vaccine mandates, filing various lawsuits in federal court. Many top public posts discuss the recent federal appeals court ruling blocking Biden’s vaccine mandates for companies [Slides 7-8].
- **Covid-19 Winter Outlook:** As the holiday season approaches along with the winter season and colder temperatures, health officials are urging eligible adults to get Covid-19 booster shots to help mitigate the expected increase in cases and hospitalizations. Many top engaged posts share health concerns and travel requirements in light of upcoming holiday activities [Slides 9-10].

Let us know if you have any questions or specific keywords / topics you’d like for us to explore in the next report. As always, please do not share.

Thank you,


∞ Meta



From: [REDACTED]@cdc.gov>
Sent: Wednesday, November 10, 2021 10:25 AM
To: [REDACTED]@fb.com>
Subject: RE: Crowd Tangle COVID-19 reports

Thanks!

From: [REDACTED]@fb.com>
Sent: Wednesday, November 10, 2021 1:06 PM
To: [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]


Attached, please find the latest CrowdTangle content insights report for the period of Oct 20 – Nov 2. You will find the summary from this report below:

Highly engaged COVID vaccine-related content [Slides 3-4] across Pages features posts by conservative news outlets and media pundits discussing backlash and fallout over employee vaccine mandates. Similarly, many posts with the highest interactions in public Groups share news from elected officials, courts, and businesses reacting to the vaccine mandates. In this report, we will further explore highly engaged content within the following themes:

- **Vaccine Mandate Legal Challenges:** Opponents of the Biden administration's COVID vaccine mandates are asking courts to block these policies from coming into effect. Top posts feature articles from news outlets reporting recent court decisions, such as a ruling by Judge Colleen Kollar Kotelly that temporarily prevents military plaintiffs who sued over religious exemptions from vaccine mandates from being fired [Slides 5-6].
- **COVID-19 Vaccines for Children:** The FDA recently authorized Pfizer's COVID-19 vaccine for children aged 5 to 11. Pfizer is currently the only vaccine approved for this age group; however, Moderna states that their vaccine has also proven effective amongst children. News breaking posts announcing the FDA's decision often had the highest interactions [Slides 7-8].
- **Vaccine Mandate Backlash:** From Air Force personnel and police unions to Hollywood actors and sports reporters, people are taking a public stand against vaccine mandates and willing to sacrifice their employment in the process. Most engaged posts feature conservative influencers praising efforts to fight against employee mandates [Slides 9-10].

Let us know if you have any questions or specific keywords / topics you'd like for us to explore in the next report. As always, please do not share.

Thank you,





[REDACTED]

From: [REDACTED]@fb.com>
Sent: Tuesday, October 26, 2021 5:51 PM
To: [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov <[REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Attached, please find the latest CrowdTangle content insights report for the period of Oct 6 – 19. You will find the summary from this report below:

Highly engaged COVID vaccine-related content [Slides 3-4] across Pages features posts by conservative news outlets, politicians and pundits discussing various responses to the employee vaccine mandates. Similarly, many posts with the highest interactions in public Groups react to news stories about how employers and state governments are supporting or dismissing federal vaccine mandates. In this report, we will explore further highly engaged content within the following themes:

- **State Bans on COVID-19 Mandates:** Texas has most recently joined Florida in enacting a statewide ban on vaccine mandates. Many of the top posts for this topic are from influential conservative voices praising the decision [Slides 5-6].
- **Vaccine Mandates for the Airline Industry:** Texas based carriers American and Southwest plan to adhere to the federal vaccine mandate in defiance of Gov. Abbott's ban. Some of the top engaged content includes posts praising Delta Airlines' decision to drop their vaccine mandate [Slides 7-8].
- **Unemployment Benefits and Vaccine Mandates:** Businesses are enforcing employee vaccine mandates, leading some workers to leave, or be terminated from their jobs for refusing to get the jab. Those employees also run the risk of losing eligibility to receive unemployment benefits. Posts from news publishers covering the "no jab, no job" phenomenon have the highest interactions [Slides 9-10].

Let us know if you have any questions or specific keywords / topics you'd like for us to explore in the next report. As always, please do not share.

Thank you,

From: [REDACTED]@fb.com>
Sent: Tuesday, October 12, 2021 5:19 PM
To: [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov <[REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED],

Attached, please find the latest CrowdTangle content insights report for the period of Sep 22 – Oct 5. You will find the summary from this report below:

Highly engaged COVID vaccine-related content [Slides 3-4] across Pages continues to feature posts by news outlets and politicians related to employee vaccine mandates. Similarly, many posts with the highest interactions in public Groups discuss employee vaccine mandates, particularly for healthcare workers. In this report, we will further explore highly engaged content within the following themes:

- **YouTube Anti-Vaccine Content Ban:** Youtube is cracking down on vaccine misinformation by implementing a complete ban on all misleading and inaccurate vaccine content, not just COVID-19. Many of the most engaged posts are from news publishers reporting on the breaking news [Slides 5-6].
- **Vaccine Mandates Employment Status:** COVID-19 vaccine requirements for employees are resulting in record numbers of terminations and resignations across the country, especially amongst first responders. The most engaged posts for this search feature reports across the country of employees risking their jobs to oppose vaccine mandates [Slides 7-8].
- **Booster Shot Eligibility:** COVID-19 vaccine booster shots have been made available for Pfizer- BioNTech vaccine recipients who have been fully vaccinated at least six months prior. Individuals considered eligible include all persons 65 and older, and those 18 and above who live or work in high risk settings or have pre-existing medical conditions [Slides 9-10].

Let us know if you have any questions or specific keywords / topics you'd like for us to explore in the next report. As always, please do not share.

Thank you,

[REDACTED]

[Facebook](#) | [CrowdTangle](#)

From: [REDACTED]@fb.com>

Sent: Wednesday, September 29, 2021 10:10 AM

To: [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov <[REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>;

[REDACTED]@fb.com>

Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED],

Attached, please find the latest CrowdTangle content insights report for the period of Sep 8 – Sep 21. You will find the summary from this report below:

Highly engaged COVID vaccine-related content [Slides 3-4] across Pages feature posts from politicians and political influencers condemning the federal vaccine mandates recently announced by the Biden administration. In public Groups, posts with the highest interactions share stories of being affected by rising COVID-19 infections and feelings towards government mandates. In this report, we also explore highly engaged content within the following themes:

- **Federal COVID-19 Mandates:** The Biden administration has drawn strong reactions from critics who have denounced federal vaccine mandates requiring federal workers and businesses with more than 100 employees to be fully vaccinated or undergo regular COVID-19 testing. Many of the most engaged posts show support for lawsuits filed against the federal government to counter the mandates [Slides 5-6].

- - **Celebrities and COVID-19:** From Patton Oswalt to Howard Stern, celebrities have made headlines for their positions on COVID-19 mandates and vaccines. The most engaged posts found in this search feature reports of Nicki Minaj skipping the Met Gala due to vaccine hesitancy [Slides 7-8].
 -
 - **COVID-19 Vaccines for Children:** Pfizer has announced that early trials support that its COVID-19 vaccine is safe for children between 5 to 11 years of age and anticipates seeking FDA authorization soon. Posts with the highest interactions share news of Pfizer's recent development [Slides 9-10].
- Let us know if you have any questions or specific keywords / topics you'd like for us to explore in the next report. As always, please do not share.

Thank you,



[Facebook](#) | [CrowdTangle](#)

From: [REDACTED]@fb.com>
Sent: Tuesday, September 14, 2021 1:48 PM
To: [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov <[REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED],

Attached, please find the latest CrowdTangle content insights report for the period of Aug 25 – Sep 7. You will find the summary from this report below:

Highly engaged COVID vaccine-related content [Slides 3-4] across Pages feature posts from local health authorities and major news publishers sharing varying content about vaccines, hospitalizations, and mandates. In public Groups, posts with the highest interactions feature content advocating for vaccines and sharing stories of emergency rooms and patients with severe COVID. In this report, we also explore highly engaging content within the following themes:

- **COVID-19 Fines:** Florida businesses, schools, and government agencies could face \$5,000 fines for requiring proof of vaccination. This follows a bill Governor Ron DeSantis signed in May banning businesses and schools from implementing vaccine requirements [Slides 5-6].
 -
 - **"Jab Dodgers":** Unvaccinated people are attempting to evade proof of vaccination mandates by purchasing fake vaccination cards online, including from social media websites. Authorities are growing concerned that this trend will continue as more places invoke vaccine mandates [Slides 7-8].
 -
 - **Mu Variant:** The WHO recently announced that it is monitoring a fifth coronavirus variant of interest that has the potential to evade immunity provided by a previous COVID-19 infection or vaccination. The Mu variant originated in South America and has spread to at least 39 countries and has been discovered in 49 U.S states [Slides 9-10].
- Let us know if you have any questions or specific keywords / topics you'd like for us to explore in the next report. As always, please do not share.

Thank you,





[Facebook](#) | [CrowdTangle](#)

From: [REDACTED]@fb.com>
Sent: Tuesday, August 31, 2021 7:00 PM
To: [REDACTED]@cdc.gov> [REDACTED]@cdc.gov <[REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Attached, please find the latest CrowdTangle content insights report for the period of Aug 11 – Aug 24. You will find the summary from this report below:

Overall, highly engaged COVID vaccine-related content [Slides 3-4] across Pages features posts from President Biden encouraging Americans to get vaccinated. Similarly, in public Groups the posts with the highest interactions feature content related to local COVID mandates, vaccine hesitancy, and vaccination status. In this report, we also explore highly engaging content within the following themes:

- **Pfizer Vaccine FDA Approval:** The Food and Drug Administration recently approved the Pfizer-BioNTech COVID-19 vaccine, the first coronavirus vaccine to transition from emergency use authorization in the US, heralding the decision as a “key achievement for public health.” Many news publishers hypothesize that the FDA approval will lead more institutions to mandate vaccinations. [Slides 5-6]
-
- **COVID-19 & Catholicism:** Several Catholic leaders have spoken out against religious exemptions for the coronavirus vaccine as vaccination mandates are adopted across the country. Many of the top engaged posts discuss Pope Francis’s recorded video encouraging people to get vaccinated as an “act of love.” [Slides 7-8]
-
- **COVID-19 Breakthrough Cases:** Reports of fully vaccinated people still testing positive for coronavirus is likely discouraging the vaccine hesitant, leading many public figures and health experts to post educational content about the risks of remaining unvaccinated. [Slides 9-10]

Let us know if you have any questions or specific keywords / topics you’d like for us to explore in the next report. As always, please do not share.

Thank you,



[Facebook](#) | [CrowdTangle](#)

From: [REDACTED]@fb.com>
Sent: Tuesday, August 17, 2021 2:22 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>

[REDACTED]@fb.com>; [REDACTED]@fb.com>

Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Attached, please find the latest CrowdTangle content insights report for the period of July 28 – Aug 11. You will find the summary from this report below:

Highly engaged COVID vaccine-related content overall [Slides 3-4] across Pages feature posts discussing vaccine and other COVID-related mandates as the Delta variant continues to spread in the United States. Similarly in public groups, the posts with the highest interactions feature content about COVID mandates and repercussions faced by those who refuse to comply. In this report, we will explore highly engaging content within the following themes:

- **Vaccine Booster Shots:** Major publications share news about the expected FDA approval for a COVID vaccine booster to protect those with compromised immune systems from the Delta variant. Conversely, the World Health Organization released a statement imploring wealthy countries to hold off on providing booster shots until every country vaccinates at least 10% of their population. [Slides 5-6]
- **FDA Vaccine Approval:** With a new surge of COVID-19 cases, the Food and Drug Administration has pushed to fully approve Pfizer-BioNTech's COVID-19 vaccine by early September. The FDA believes that this step might inspire more confidence from the public in the vaccine. [Slides 7-8]
- **COVID-19 Mandates:** As COVID cases rise in the US, federal and state governments as well as businesses have implemented new mandates to combat the surge. On the other hand, many conservative politicians are calling for an end to government mandated restrictions and vaccinations. [Slides 9-10]
-

Let us know if you have any questions or specific keywords / topics you'd like for us to explore in the next report. As always, please do not share.

Thanks,

[REDACTED]

[Facebook](#) | [CrowdTangle](#)

From: [REDACTED]@cdc.gov>

Sent: Wednesday, August 4, 2021 6:24 AM

To: [REDACTED]@fb.com>

Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>;

[REDACTED]@fb.com> [REDACTED]@fb.com>

Subject: RE: Crowd Tangle COVID-19 reports

Thank you!

From: [REDACTED]@fb.com>

Sent: Tuesday, August 3, 2021 6:16 PM

To: [REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>;
[REDACTED]@fb.com>; [REDACTED]@fb.com>

Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED],

Attached, please find the latest CrowdTangle content insights report for the period of July 14 – July 27. You will find the summary from this report, below:

Highly engaged COVID vaccine-related content overall [Slides 3-4] across Pages continues to feature UNICEF posts relating global vaccine donation and distribution efforts. In public groups, the posts with high interactions feature content debating COVID-19 vaccination requirements as well as COVID-19 survival stories. In this report, we also explore highly engaging content within the following themes:

- **The Delta Variant:** As the Delta variant surges, several top posts from Pages and Groups discuss concerns about and experiences with COVID-19 and the new strain. Many posts advocate for individuals to get vaccinated due to the increased severity of symptoms and high transmissibility associated with the Delta variant. [Slides 5-6]
-
- **Proof of Vaccination Requirement:** Governments and public services are signaling the importance of requiring proof of vaccination at bars, concerts, and hospitals to help combat the spread of COVID-19. The highest engaged posts from Pages and Groups share articles about shifting guidelines and responses to those mandates. [Slides 7-8]
-
- **COVID-19 and Unvaccinated Individuals:** A rise in COVID-19 cases across the U.S. has contributed to concerns that the recent uptick in hospitalizations and deaths is being driven by unvaccinated individuals. High interaction public Page and Group posts for this topic continue the debate over the necessity of being vaccinated. [Slides 9-10]

Let us know if you have any questions or specific keywords / topics you'd like for us to explore in the next report. As always, please do not share.

Thanks,

[REDACTED]

[Facebook](#) | [CrowdTangle](#)

From: [REDACTED]@fb.com>
Sent: Tuesday, July 20, 2021 2:22 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>;
[REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED],

Attached, please find the latest CrowdTangle content insights report for the period of June 30 – July 13 (attached). Here's the summary from this report, below:

Highly engaged COVID vaccine-related content overall [Slides 3-4] across Pages continues to include UNICEF's posts, as well as posts related to Pres. Biden's new strategy to increase vaccinations. In public groups, the posts with high interactions feature content debating COVID-19 vaccinations. In this report, we also explore highly engaging content within the following themes:

- **Reopening of Institutions:** Many of the highest engaged Page posts with keywords related to this theme share news of shifting public health policies allowing people to return to work, school, and religious services. Several posts focus on new guidelines for students returning back to school, with some expressing skepticism about vaccinating children. [Slides 5-6]
 - **Olympics and COVID-19:** As the Tokyo Olympics draws closer, several high interaction Page posts on this discuss the recent spectator ban at the Olympics due to Tokyo's state of emergency from rising coronavirus cases. Also, many US publishers and pundits shared posts about US Olympic swimmer Michael Andrew refusing to be vaccinated ahead of Tokyo Olympics. [Slides 7-8].
 - **Door-to-Door Vaccines:** The highest interaction Page posts for this topic convey concern from political opponents about the Biden administration's strategy to ramp up vaccination efforts in communities with low vaccination rates by going "door-to-door" to educate and encourage more Americans to get vaccinated. [Slides 9-10]
- Let us know if you have any questions or specific keywords / topics you'd like for us to explore in the next report. As always, please do not share.

Thanks,



[Facebook](#) | [CrowdTangle](#)

From: [REDACTED] <[REDACTED]@cdc.gov>
Sent: Tuesday, June 22, 2021 2:02 PM
To: [REDACTED] <[REDACTED]@fb.com>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: RE: Crowd Tangle COVID-19 reports

Thank you!

From: [REDACTED] <[REDACTED]@fb.com>
Sent: Tuesday, June 22, 2021 4:43 PM
To: [REDACTED] <[REDACTED]@cdc.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Looking forward to working with your team!

Attached, please find the latest CrowdTangle content insights report for the period of June 2 – June 16 (attached). I also want to make you aware that the next bi-weekly content insights report will be sent to you on Tuesday, July 20th instead of July 6th as I will be out of the office next week until July 7th.

Here's the quick summary from this report:

Highly engaged COVID vaccine-related content overall [Slides 3-4] across Pages continues to include UNICEF's posts, as well as posts related to global vaccine distribution in third world countries. In public groups, the posts with high interactions feature content related to the suspension of hospital workers for refusing the vaccine. In this report, we also explore highly engaging content within the following themes:

- **Global Vaccinations:** Many of the highest engaged Page posts with related keywords report on the global vaccine supply and efforts being undertaken by world leaders to reach every country. The most engaged Group posts feature news of the United States' commitment to donate supplies to vaccine-deprived countries. [Slides 5-6]
 - **Vaccine Side Effects:** A number of high interaction Page posts on this topic express continued interest in and concerns about potential vaccine side effects, especially for children and pregnant women. Highly engaged Group posts reveal similar themes of hesitation and skepticism related to the long-term effects of the vaccine. [Slides 7-8].
 - **Vaccine Refusal:** The highest interaction Page posts for this topic are from media outlets and personalities reacting to a recent court decision effectively upholding a Texas hospital's COVID vaccine mandate for its employees. The most engaged Group posts for this topic highlighted similar themes. [Slides 9-10]
- Let us know if you have any questions or specific keywords / topics you'd like for us to explore in the next report. As always, please do not share.

Thanks,



[Facebook](#) | [CrowdTangle](#)

From: [REDACTED]@cdc.gov>
Sent: Wednesday, June 9, 2021 7:20 AM
To: [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: RE: Crowd Tangle COVID-19 reports

Thank you and appreciate [REDACTED] taking over for us!

From: [REDACTED]@fb.com>
Sent: Tuesday, June 8, 2021 8:13 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

[REDACTED]

Attaching the latest CrowdTangle content insights report for the period of May 19-June 1 (attached). I wanted to note that [REDACTED] (cc'ed) is taking over the oversight for these reports, and will be providing them to you going forward. Here's the quick summary from this report:

Highly engaged COVID vaccine-related content overall [Slides 3-4] across Pages continues to include UNICEF's posts, as well as posts related to vaccine refusal and discrimination. In public Groups, high-interaction posts include posts around vaccine passports and required vaccination, along with personal stories from COVID survivors or of side effects. In this report, we also explore highly engaged content within the following themes:

- **Vaccination Lawsuits:** Many of the highest engaged Page posts with related keywords report on lawsuits over compulsory vaccinations related to employment. Additionally, there are reports of lawsuits attempting to stop children from being vaccinated. Group posts include varied stances on the same topics. [Slides 5-6]
- **Deciding to Get Vaccinated:** A number of high interaction Page posts on this topic come from public figures, with many politicians weighing in on both sides of the aisle. In Groups, we see posts from individuals reacting to this debate, sharing their personal thoughts and concerns. [Slides 7-8]
- **Pandemic Origins:** High interaction Page posts on the origins of COVID-19 shared news of the changing theories about COVID being potentially man-made, as well as changing social media policies around related content. Group posts covered similar topics, with meme posts around the same themes appearing as well. [Slides 9-10]

Let us know if you have any questions or particular keywords/topics you'd like us to explore for the next report.

Thanks,

From: [REDACTED]@fb.com>

Date: Monday, March 15, 2021 at 6:19 PM

To: [REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]

<[REDACTED]@fb.com>

Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Attaching the latest CrowdTangle content insights report for the period of February 24-March 10 (attached). Here's the quick summary:

Top engaged COVID vaccine-related content overall across Pages and Groups [Slides 3-4] continues to include many posts from UNICEF, as well as politically-related commentary and news around the vaccine rollout. Public figure vaccinations (notably, Dolly Parton's) garnered high engagement from Pages, while Groups still saw high engagement around personal experiences, in addition to more general news-sharing around vaccines. However, posts falling into the following themes also garnered high engagement:

- **Post-vaccination guidelines and protocols** drew high engagement after the CDC's new guidelines were announced, with the idea that "vaccinated people can gather without masks" appearing in headlines in Page posts. Group posts considered how the update might affect their specific interests and communities. [Slides 5-6]
- **Vaccine ingredients** saw higher interactions during this period in posts about fetal cells in the Johnson & Johnson vaccine, and religious leaders' corresponding recommendations to avoid it. [Slides 7-8]
- **Vaccine side effects** continue to be mentioned in posts mythbusting, educating, and reporting on different side effects, but also in personal Group posts looking for advice or commiseration around vaccine experiences and reactions as more people get vaccinated. [Slides 9-10]

This week, we also are including a one-off content insights report we did looking at Spanish-language content relevant to the US, which we thought might be interesting for you (as always, please do not share externally).

Let us know if you have any questions or particular keywords/topics you'd like us to explore for the next report.

Thanks,

[REDACTED]

From: [REDACTED]@fb.com>
Date: Monday, March 1, 2021 at 6:03 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]
[REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

And adding in [REDACTED], apologies!

From: [REDACTED]@fb.com>
Date: Monday, March 1, 2021 at 5:47 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]
<[REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Attaching the latest CrowdTangle content insights report for the period of February 10-24 (attached). Here's the quick summary:

Top engaged COVID vaccine-related content overall across Pages and public Groups in the CrowdTangle database [Slides 3-4] continues to include posts from UNICEF, as well as politically-related commentary/news around the vaccine rollout. Human-interest news stories around vaccination also garnered high engagement from Pages, while Groups saw higher engagement around personal experiences (both getting vaccinated or mentioning vaccines in the context of life updates). However, posts falling into the following themes also garnered high engagement:

- **COVID-19 and mental health** keywords appeared in multiple highly-engaged Page posts that focused on mental health effects on young people during the pandemic, with varying levels of criticism about how the situation is being handled. High-interaction Group posts tended to highlight personal struggles. [Slides 5-6]
- **Vaccine refusal** appeared in two main contexts in highly engaged posts - military refusals and consequences (often employment-related) for refusing the vaccine. [Slides 7-8]
- **Testing positive post-vaccination** appeared in news reports (seen in Page posts) covering specific instances, with especially high interactions around a story of four people in Oregon. Groups also shared similar news, but higher-engagement posts there tended to share personal stories or look for advice. [Slides 9-10]

As always, please let us know if you have any questions or particular keywords/topics you'd like us to explore for the next report.

Thanks,
[REDACTED]

From: [REDACTED]@cdc.gov>
Date: Wednesday, February 17, 2021 at 5:37 AM
To: [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]
<[REDACTED]@fb.com>
Subject: RE: Crowd Tangle COVID-19 reports

Thank you – very helpful!

From: [REDACTED]@fb.com>
Sent: Tuesday, February 16, 2021 9:00 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Attaching the latest CrowdTangle content insights report for the period of January 27-February 10 (attached). Here's the quick summary:

Top engaged COVID vaccine-related content overall across Pages and Groups [Slides 3-4] includes a number of posts from UNICEF, celebrations and condemnations of the successes and failure of the vaccine rollout, and some additional criticism/skepticism around the vaccine and its efficacy (primarily in Groups). However, posts falling into the following themes also garnered high engagement:

- **Reports of deaths post-vaccination** continue to garner high interactions from both Pages (largely news organizations) and Groups, where a few personal reports appear mixed in with news articles. [Slides 5-6]
- **Double-masking**, while not directly related to the vaccine, drew high engagement as new studies and recommendations around wearing two masks were shared by both Pages and Groups. Some high-interaction posts from Pages mocked the idea and Fauci's changing position on it, while in Groups criticism came in meme form. [Slides 7-8]
- **Personal reports of vaccination** continue as more people are vaccinated. On Pages, highly engaged posts tend to highlight the experiences of public figures or government officials, but more graphic experiences with side effects - some looking for reassurance - garnered high interactions in Groups. [Slides 9-10]

As always, please let us know if you have any questions or particular keywords/topics you'd like us to explore for the next report.

Thanks,
[REDACTED]

From: [REDACTED]@cdc.gov>
Date: Tuesday, February 2, 2021 at 7:51 AM
To: [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: RE: Crowd Tangle COVID-19 reports

Thank you!

From: [REDACTED]@fb.com>
Sent: Monday, February 1, 2021 8:39 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Crowd Tangle COVID-19 reports

Hi All,

Sending along the latest CrowdTangle content insights report for the period of January 14-28 (attached). As always, please let us know if you have any questions or particular keywords/topics you'd like us to explore for the next report. Here's the quick summary:

Top engaged COVID and vaccine-related content overall across Pages and Groups [Slides 3-4] included many posts from large health organizations like UNICEF, news around government and brands' COVID plans, and people reporting on their current local situation. However, posts falling into the following themes also garnered high engagement:

- **Vaccine and COVID variant** news drove high interactions, with reports and concern around vaccine effectiveness against new strains. In Groups, variants also entered the anti-vaccination conversation. [Slides 5-6]
- **Vaccine side effects** continued to be mentioned in highly-engaged posts, though they included educational content side effects and personal stories of minimal side effects from vaccination. However, reports of specific cases of severe side effects and death continued to garner engagement. [Slides 7-8]
- **Mandatory vaccination and vaccine passports** made news in posts from Pages as a result of new technology and United Airlines' desire to make vaccines mandatory. Group posts speculate about travel logistics and specific scenarios that will personally affect the various posters and audiences. [Slides 9-10]

As before, links to CrowdTangle Searches are included with each topic if you'd like to explore more!

Thanks,

From: [REDACTED]@fb.com>
Date: Tuesday, January 26, 2021 at 11:51 AM
To: [REDACTED]@fb.com>, [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports for WHO

Thank you [REDACTED]!

[REDACTED] as [REDACTED] mentioned, we'll send the next one on February 1st. Glad to hear they look like they will be useful!

Best,

From: [REDACTED]@fb.com>
Date: Tuesday, January 26, 2021 at 11:34 AM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports for WHO

Lol, no we didn't speak to Census. Just a coincidence! :)

[REDACTED], feel free to send the reports directly to [REDACTED] and cc [REDACTED] and I and thank you for your work on these and do adjust if CDC has any suggestions for content.

Best,

From: [REDACTED]@cdc.gov>
Date: Tuesday, January 26, 2021 at 1:35 PM
To: [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com> [REDACTED]@fb.com>, [REDACTED]@fb.com>
Subject: RE: Crowd Tangle COVID-19 reports for WHO

Sorry my delay in response, I overlooked this yesterday. It looks wonderful and much appreciated. For now, send to me but I will be extending our distribution list.

One group we'll be adding is the Census group who hopefully will soon start their project with us. (Did you by chance talk to them yesterday? As this just came up with them yesterday?). Also, the wide group of those looking at misinfo will want this.

THANK you! I will let you know if there is additional feedback.

From [REDACTED]@fb.com>
Sent: Monday, January 25, 2021 5:51 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Crowd Tangle COVID-19 reports for WHO

Hi [REDACTED]

I am following up on our conversation several weeks ago about providing more detailed reporting from our CrowdTangle team. I wanted to share our first CrowdTangle COVID content report with you courtesy of [REDACTED] and [REDACTED] on the cc. They are providing these to WHO, and thought it helpful for CDC teams as well. This report covers the time period of Jan 1 to January 14th. **Going forward, these reports will be developed bi-weekly, with the next one ready for delivery on February 1. Who would you like these sent to?**

Lauren can do that distro and just put you/[REDACTED], me, and [REDACTED] on cc if that works. But you let us know what you are thinking and if you want to distribute.

The full report is attached, but some highlights the CrowdTangle team would like to call to your attention are:

- Top engaged COVID and vaccine-related content overall across Pages and Groups [Slides 3-4] was largely a mix of educational posts, reports of successful vaccinations (from public figures and users), and news/commentary on COVID and the vaccination rollout.
- However, posts falling into the following themes, all of which have potential risks, also garnered high engagement:
 1. **Reports of healthcare workers refusing the vaccine**, driven largely by an article from Forbes, were widely shared and received high engagement in healthcare worker-centric Groups, as well as anti-vaccination Groups. [Slides 5-6]
 2. **Posts about alleged vaccine-related deaths**, especially news of a Miami doctor's death that is under investigation, got high engagement. Groups, especially anti-vaccination Groups, tended to share a larger variety of reported deaths from around the globe. [Slides 7-8]
 3. **News and reports of severe vaccine side effects included both first- and secondhand reports in Groups**, with users sharing photos and video related to their own experiences. Highly engaged Page posts contained some news reports of bad side effects, but also included content meant to educate the public (including from the CDC). [Slides 9-10]

We've included links to the searches we used to develop these insights in the report, but please let us know if you or anyone on your team has trouble accessing these searches. And of course, we welcome your feedback on the report's content, template and any other areas that might makes these most effective for your team.

Thank you,

[REDACTED] and team

From: [REDACTED]
Sent: 8/18/2021 7:04:07 AM
To: [REDACTED]@fb.com]
CC: [REDACTED]@cdc.gov]
Subject: RE: Crowd Tangle COVID-19 reports

Hi [REDACTED] I'm going to be out of the office for several weeks in September. When you send these, can you please include [REDACTED] copied here, so she can share with others if I'm out? Thanks so much!

From: [REDACTED]<tlw@fb.com>
Sent: Tuesday, August 17, 2021 5:23 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Attached, please find the latest CrowdTangle content insights report for the period of July 28 – Aug 11. You will find the summary from this report below:

Highly engaged COVID vaccine-related content overall [Slides 3-4] across Pages feature posts discussing vaccine and other COVID-related mandates as the Delta variant continues to spread in the United States. Similarly in public groups, the posts with the highest interactions feature content about COVID mandates and repercussions faced by those who refuse to comply. In this report, we will explore highly engaging content within the following themes:

- **Vaccine Booster Shots:** Major publications share news about the expected FDA approval for a COVID vaccine booster to protect those with compromised immune systems from the Delta variant. Conversely, the World Health Organization released a statement imploring wealthy countries to hold off on providing booster shots until every country vaccinates at least 10% of their population. [Slides 5-6]
- **FDA Vaccine Approval:** With a new surge of COVID-19 cases, the Food and Drug Administration has pushed to fully approve Pfizer-BioNTech's COVID-19 vaccine by early September. The FDA believes that this step might inspire more confidence from the public in the vaccine. [Slides 7-8]
- **COVID-19 Mandates:** As COVID cases rise in the US, federal and state governments as well as businesses have implemented new mandates to combat the surge. On the other hand, many conservative politicians are calling for an end to government mandated restrictions and vaccinations. [Slides 9-10]
-

Let us know if you have any questions or specific keywords / topics you'd like for us to explore in the next report. As always, please do not share.

Thanks,

[Facebook](#) | [CrowdTangle](#)

From: [REDACTED]@cdc.gov>
Sent: Wednesday, August 4, 2021 6:24 AM
To: [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: RE: Crowd Tangle COVID-19 reports

Thank you!

From: [REDACTED]@fb.com>
Sent: Tuesday, August 3, 2021 6:16 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Attached, please find the latest CrowdTangle content insights report for the period of July 14 – July 27. You will find the summary from this report, below:

Highly engaged COVID vaccine-related content overall [Slides 3-4] across Pages continues to feature UNICEF posts relating global vaccine donation and distribution efforts. In public groups, the posts with high interactions feature content debating COVID-19 vaccination requirements as well as COVID-19 survival stories. In this report, we also explore highly engaging content within the following themes:

- **The Delta Variant:** As the Delta variant surges, several top posts from Pages and Groups discuss concerns about and experiences with COVID-19 and the new strain. Many posts advocate for individuals to get vaccinated due to the increased severity of symptoms and high transmissibility associated with the Delta variant. [Slides 5-6]
-
- **Proof of Vaccination Requirement:** Governments and public services are signaling the importance of requiring proof of vaccination at bars, concerts, and hospitals to help combat the spread of COVID-19. The highest

engaged posts from Pages and Groups share articles about shifting guidelines and responses to those mandates. [Slides 7-8]

- **COVID-19 and Unvaccinated Individuals:** A rise in COVID-19 cases across the U.S. has contributed to concerns that the recent uptick in hospitalizations and deaths is being driven by unvaccinated individuals. High interaction public Page and Group posts for this topic continue the debate over the necessity of being vaccinated. [Slides 9-10]

Let us know if you have any questions or specific keywords / topics you'd like for us to explore in the next report. As always, please do not share.

Thanks,

Strategic Partner Development, Policy | CrowdTangle

[Facebook](#) | [CrowdTangle](#)

From: [REDACTED]@fb.com>

Sent: Tuesday, July 20, 2021 2:22 PM

To: [REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>

Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED],

Attached, please find the latest CrowdTangle content insights report for the period of June 30 – July 13 (attached). Here's the summary from this report, below:

Highly engaged COVID vaccine-related content overall [Slides 3-4] across Pages continues to include UNICEF's posts, as well as posts related to Pres. Biden's new strategy to increase vaccinations. In public groups, the posts with high interactions feature content debating COVID-19 vaccinations. In this report, we also explore highly engaging content within the following themes:

- **Reopening of Institutions:** Many of the highest engaged Page posts with keywords related to this theme share news of shifting public health policies allowing people to return to work, school, and religious services. Several posts focus on new guidelines for students returning back to school, with some expressing skepticism about vaccinating children. [Slides 5-6]
- **Olympics and COVID-19:** As the Tokyo Olympics draws closer, several high interaction Page posts on this discuss the recent spectator ban at the Olympics due to Tokyo's state of emergency from rising coronavirus cases. Also, many US publishers and pundits shared posts about US Olympic swimmer Michael Andrew refusing to be vaccinated ahead of Tokyo Olympics. [Slides 7-8].

- **Door-to-Door Vaccines:** The highest interaction Page posts for this topic convey concern from political opponents about the Biden administration's strategy to ramp up vaccination efforts in communities with low vaccination rates by going "door-to-door" to educate and encourage more Americans to get vaccinated. [Slides 9-10] Let us know if you have any questions or specific keywords / topics you'd like for us to explore in the next report. As always, please do not share.

Thanks,

[REDACTED]

[REDACTED]

[Facebook](#) | [CrowdTangle](#)

From: [REDACTED] <[REDACTED]@cdc.gov>
Sent: Tuesday, June 22, 2021 2:02 PM
To: [REDACTED] <[REDACTED]@fb.com>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: RE: Crowd Tangle COVID-19 reports

Thank you!

From: [REDACTED] <[REDACTED]@fb.com>
Sent: Tuesday, June 22, 2021 4:43 PM
To: [REDACTED] <[REDACTED]@cdc.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Looking forward to working with your team!

Attached, please find the latest CrowdTangle content insights report for the period of June 2 – June 16 (attached). I also want to make you aware that the next bi-weekly content insights report will be sent to you on Tuesday, July 20th instead of July 6th as I will be out of the office next week until July 7th.

Here's the quick summary from this report:

Highly engaged COVID vaccine-related content overall [Slides 3-4] across Pages continues to include UNICEF's posts, as well as posts related to global vaccine distribution in third world countries. In public groups, the posts with high

interactions feature content related to the suspension of hospital workers for refusing the vaccine. In this report, we also explore highly engaging content within the following themes:

- **Global Vaccinations:** Many of the highest engaged Page posts with related keywords report on the global vaccine supply and efforts being undertaken by world leaders to reach every country. The most engaged Group posts feature news of the United States' commitment to donate supplies to vaccine-deprived countries. [Slides 5-6]
 -
 - **Vaccine Side Effects:** A number of high interaction Page posts on this topic express continued interest in and concerns about potential vaccine side effects, especially for children and pregnant women. Highly engaged Group posts reveal similar themes of hesitation and skepticism related to the long-term effects of the vaccine. [Slides 7-8].
 -
 - **Vaccine Refusal:** The highest interaction Page posts for this topic are from media outlets and personalities reacting to a recent court decision effectively upholding a Texas hospital's COVID vaccine mandate for its employees. The most engaged Group posts for this topic highlighted similar themes. [Slides 9-10]
- Let us know if you have any questions or specific keywords / topics you'd like for us to explore in the next report. As always, please do not share.

Thanks,



[Facebook](#) | [CrowdTangle](#)

From: [REDACTED] <[REDACTED]@cdc.gov>
Sent: Wednesday, June 9, 2021 7:20 AM
To: [REDACTED] <[REDACTED]@fb.com>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: RE: Crowd Tangle COVID-19 reports

Thank you and appreciate [REDACTED] taking over for us!

From: [REDACTED] <[REDACTED]@fb.com>
Sent: Tuesday, June 8, 2021 8:13 PM
To: [REDACTED] <[REDACTED]@cdc.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Attaching the latest CrowdTangle content insights report for the period of May 19-June 1 (attached). I wanted to note that [REDACTED] (cc'ed) is taking over the oversight for these reports, and will be providing them to you going forward. Here's the quick summary from this report:

Highly engaged COVID vaccine-related content overall [Slides 3-4] across Pages continues to include UNICEF's posts, as well as posts related to vaccine refusal and discrimination. In public Groups, high-interaction posts include posts around vaccine passports and required vaccination, along with personal stories from COVID survivors or of side effects. In this report, we also explore highly engaged content within the following themes:

- **Vaccination Lawsuits:** Many of the highest engaged Page posts with related keywords report on lawsuits over compulsory vaccinations related to employment. Additionally, there are reports of lawsuits attempting to stop children from being vaccinated. Group posts include varied stances on the same topics. [Slides 5-6]
- **Deciding to Get Vaccinated:** A number of high interaction Page posts on this topic come from public figures, with many politicians weighing in on both sides of the aisle. In Groups, we see posts from individuals reacting to this debate, sharing their personal thoughts and concerns. [Slides 7-8]
- **Pandemic Origins:** High interaction Page posts on the origins of COVID-19 shared news of the changing theories about COVID being potentially man-made, as well as changing social media policies around related content. Group posts covered similar topics, with meme posts around the same themes appearing as well. [Slides 9-10]

Let us know if you have any questions or particular keywords/topics you'd like us to explore for the next report.

Thanks,

From: [REDACTED]@fb.com>

Date: Monday, March 15, 2021 at 6:19 PM

To: [REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]

[REDACTED]@fb.com>

Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED],

Attaching the latest CrowdTangle content insights report for the period of February 24-March 10 (attached). Here's the quick summary:

Top engaged COVID vaccine-related content overall across Pages and Groups [Slides 3-4] continues to include many posts from UNICEF, as well as politically-related commentary and news around the vaccine rollout. Public figure vaccinations (notably, Dolly Parton's) garnered high engagement from Pages, while Groups still saw high engagement around personal experiences, in addition to more general news-sharing around vaccines. However, posts falling into the following themes also garnered high engagement:

- **Post-vaccination guidelines and protocols** drew high engagement after the CDC's new guidelines were announced, with the idea that "vaccinated people can gather without masks" appearing in headlines in Page posts. Group posts considered how the update might affect their specific interests and communities. [Slides 5-6]
- **Vaccine ingredients** saw higher interactions during this period in posts about fetal cells in the Johnson & Johnson vaccine, and religious leaders' corresponding recommendations to avoid it. [Slides 7-8]
- **Vaccine side effects** continue to be mentioned in posts mythbusting, educating, and reporting on different side effects, but also in personal Group posts looking for advice or commiseration around vaccine experiences and reactions as more people get vaccinated. [Slides 9-10]

This week, we also are including a one-off content insights report we did looking at Spanish-language content relevant to the US, which we thought might be interesting for you (as always, please do not share externally).

Let us know if you have any questions or particular keywords/topics you'd like us to explore for the next report.

Thanks,
[REDACTED]

From: [REDACTED]@fb.com>
Date: Monday, March 1, 2021 at 6:03 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]
[REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

And adding in [REDACTED], apologies!

From: [REDACTED]@fb.com>
Date: Monday, March 1, 2021 at 5:47 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]
<[REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED],

Attaching the latest CrowdTangle content insights report for the period of February 10-24 (attached). Here's the quick summary:

Top engaged COVID vaccine-related content overall across Pages and public Groups in the CrowdTangle database [Slides 3-4] continues to include posts from UNICEF, as well as politically-related commentary/news around the vaccine rollout. Human-interest news stories around vaccination also garnered high engagement from Pages, while Groups saw higher engagement around personal experiences (both getting vaccinated or mentioning vaccines in the context of life updates). However, posts falling into the following themes also garnered high engagement:

- **COVID-19 and mental health** keywords appeared in multiple highly-engaged Page posts that focused on mental health effects on young people during the pandemic, with varying levels of criticism about how the situation is being handled. High-interaction Group posts tended to highlight personal struggles. [Slides 5-6]
- **Vaccine refusal** appeared in two main contexts in highly engaged posts - military refusals and consequences (often employment-related) for refusing the vaccine. [Slides 7-8]
- **Testing positive post-vaccination** appeared in news reports (seen in Page posts) covering specific instances, with especially high interactions around a story of four people in Oregon. Groups also shared similar news, but higher-engagement posts there tended to share personal stories or look for advice. [Slides 9-10]

As always, please let us know if you have any questions or particular keywords/topics you'd like us to explore for the next report.

Thanks,
[REDACTED]

From: [REDACTED]@cdc.gov>
Date: Wednesday, February 17, 2021 at 5:37 AM
To: [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]

<[REDACTED]@fb.com>

Subject: RE: Crowd Tangle COVID-19 reports

Thank you – very helpful!

From: [REDACTED]@fb.com>

Sent: Tuesday, February 16, 2021 9:00 PM

To: [REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>

Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Attaching the latest CrowdTangle content insights report for the period of January 27-February 10 (attached). Here's the quick summary:

Top engaged COVID vaccine-related content overall across Pages and Groups [Slides 3-4] includes a number of posts from UNICEF, celebrations and condemnations of the successes and failure of the vaccine rollout, and some additional criticism/skepticism around the vaccine and its efficacy (primarily in Groups). However, posts falling into the following themes also garnered high engagement:

- **Reports of deaths post-vaccination** continue to garner high interactions from both Pages (largely news organizations) and Groups, where a few personal reports appear mixed in with news articles. [Slides 5-6]
- **Double-masking**, while not directly related to the vaccine, drew high engagement as new studies and recommendations around wearing two masks were shared by both Pages and Groups. Some high-interaction posts from Pages mocked the idea and Fauci's changing position on it, while in Groups criticism came in meme form. [Slides 7-8]
- **Personal reports of vaccination** continue as more people are vaccinated. On Pages, highly engaged posts tend to highlight the experiences of public figures or government officials, but more graphic experiences with side effects - some looking for reassurance - garnered high interactions in Groups. [Slides 9-10]

As always, please let us know if you have any questions or particular keywords/topics you'd like us to explore for the next report.

Thanks,

From: [REDACTED]@cdc.gov>

Date: Tuesday, February 2, 2021 at 7:51 AM

To: [REDACTED]@fb.com>

Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]

<[REDACTED]@fb.com>

Subject: RE: Crowd Tangle COVID-19 reports

Thank you!

From: [REDACTED]@fb.com>

Sent: Monday, February 1, 2021 8:39 PM

To: [REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
 Subject: Crowd Tangle COVID-19 reports

Hi All,

Sending along the latest CrowdTangle content insights report for the period of January 14-28 (attached). As always, please let us know if you have any questions or particular keywords/topics you'd like us to explore for the next report. Here's the quick summary:

Top engaged COVID and vaccine-related content overall across Pages and Groups [Slides 3-4] included many posts from large health organizations like UNICEF, news around government and brands' COVID plans, and people reporting on their current local situation. However, posts falling into the following themes also garnered high engagement:

- **Vaccine and COVID variant** news drove high interactions, with reports and concern around vaccine effectiveness against new strains. In Groups, variants also entered the anti-vaccination conversation. [Slides 5-6]
- **Vaccine side effects** continued to be mentioned in highly-engaged posts, though they included educational content side effects and personal stories of minimal side effects from vaccination. However, reports of specific cases of severe side effects and death continued to garner engagement. [Slides 7-8]
- **Mandatory vaccination and vaccine passports** made news in posts from Pages as a result of new technology and United Airlines' desire to make vaccines mandatory. Group posts speculate about travel logistics and specific scenarios that will personally affect the various posters and audiences. [Slides 9-10]

As before, links to CrowdTangle Searches are included with each topic if you'd like to explore more!

Thanks,

From: [REDACTED]@fb.com>
 Date: Tuesday, January 26, 2021 at 11:51 AM
 To: [REDACTED]@fb.com>, [REDACTED]@cdc.gov>
 Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>
 Subject: Re: Crowd Tangle COVID-19 reports for WHO

Thank you [REDACTED] and [REDACTED]!

[REDACTED], as [REDACTED] mentioned, we'll send the next one on February 1st. Glad to hear they look like they will be useful!

Best,

From: [REDACTED]@fb.com>
 Date: Tuesday, January 26, 2021 at 11:34 AM
 To: [REDACTED]@cdc.gov>
 Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]@fb.com>
 Subject: Re: Crowd Tangle COVID-19 reports for WHO

Lol, no we didn't' speak to Census. Just a coincidence! :)

[REDACTED], feel free to send the reports directly to [REDACTED] and cc [REDACTED] and I and thank you for your work on these and do adjust if CDC has any suggestions for content.

Best,

From: [REDACTED]@cdc.gov>
 Date: Tuesday, January 26, 2021 at 1:35 PM
 To: [REDACTED]@fb.com>
 Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]@fb.com>
 Subject: RE: Crowd Tangle COVID-19 reports for WHO

Sorry my delay in response, I overlooked this yesterday. It looks wonderful and much appreciated. For now, send to me but I will be extending our distribution list.

One group we'll be adding is the Census group who hopefully will soon start their project with us. (Did you by chance talk to them yesterday? As this just came up with them yesterday?). Also, the wide group of those looking at misinfo will want this.

THANK you! I will let you know if there is additional feedback.

From: [REDACTED]@fb.com>
 Sent: Monday, January 25, 2021 5:51 PM
 To: [REDACTED]@cdc.gov>
 Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]@fb.com>
 Subject: Crowd Tangle COVID-19 reports for WHO

Hi [REDACTED]

I am following up on our conversation several weeks ago about providing more detailed reporting from our CrowdTangle team. I wanted to share our first CrowdTangle COVID content report with you courtesy of [REDACTED] and [REDACTED] on the cc. They are providing these to WHO, and thought it helpful for CDC teams as well. This report covers the time period of Jan 1 to January 14th. Going forward, these reports will be developed bi-weekly, with the next one ready for delivery on February 1. Who would you like these sent to?

[REDACTED] can do that distro and just put you/[REDACTED], me, and [REDACTED] on cc if that works. But you let us know what you are thinking and if you want to distribute.

The full report is attached, but some highlights the CrowdTangle team would like to call to your attention are:

- Top engaged COVID and vaccine-related content overall across Pages and Groups [Slides 3-4] was largely a mix of educational posts, reports of successful vaccinations (from public figures and users), and news/commentary on COVID and the vaccination rollout.
- However, posts falling into the following themes, all of which have potential risks, also garnered high engagement:
 1. **Reports of healthcare workers refusing the vaccine**, driven largely by an article from Forbes, were widely shared and received high engagement in healthcare worker-centric Groups, as well as anti-vaccination Groups. [Slides 5-6]
 2. **Posts about alleged vaccine-related deaths**, especially news of a Miami doctor's death that is under investigation, got high engagement. Groups, especially anti-vaccination Groups, tended to share a larger variety of reported deaths from around the globe. [Slides 7-8]

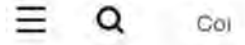
3. **News and reports of severe vaccine side effects included both first- and secondhand reports in Groups**, with users sharing photos and video related to their own experiences. Highly engaged Page posts contained some news reports of bad side effects, but also included content meant to educate the public (including from the CDC). [Slides 9-10]

We've included links to the searches we used to develop these insights in the report, but please let us know if you or anyone on your team has trouble accessing these searches. And of course, we welcome your feedback on the report's content, template and any other areas that might make these most effective for your team.

Thank you,
[REDACTED] and team

From: [REDACTED]
Sent: 6/30/2021 7:50:15 AM
To: [REDACTED]@twitter.com]
Subject: RE: COVID Misinformation

Hi [REDACTED] – I've been trying to enter info but I realize I've been unclear on where to enter them. I went to /forms and there is a drop down on things to submit but none of them seem relevant to misinformation. Am I in the right place?



- Pages
- Check accounts on
- Website accounts on
- Twitter myths
- Rules

Contact Us > [Partner Support](#)

Report any issue to get priority service

What type of problem are you having with your Twitter account? (required)

From: [REDACTED]@twitter.com>
Sent: Thursday, May 27, 2021 2:30 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@reingold.com> [REDACTED]@reingold.com>; [REDACTED]@cdc.gov>
Subject: Re: COVID Misinformation

Hi all - [REDACTED] you should now be fully. When you visit the Twitter help center logged in with your account you should see additional reporting options.

On Mon, May 24, 2021 at 3:14 PM [REDACTED]@twitter.com> wrote:

Thanks for letting me know - I've just sent a note to our team requesting an update.

On Mon, May 24, 2021 at 3:06 PM [REDACTED]@cdc.gov> wrote:

I haven't seen anything come through so far.

From: [REDACTED]@twitter.com>
Sent: Monday, May 24, 2021 2:57 PM
To: [REDACTED]@reingold.com>
Cc: [REDACTED]@cdc.gov>; [REDACTED]@reingold.com>; [REDACTED]
[REDACTED]@cdc.gov>
Subject: Re: COVID Misinformation

Hi [REDACTED] and I had a sidebar and I requested her account be enrolled. Your email reminds me that the process should have been completed by now - I'll check with on our team to make sure she's properly enrolled.

On Mon, May 24, 2021 at 2:28 PM [REDACTED]@reingold.com> wrote:

Hi [REDACTED]

I hope you had a good weekend. I'm following up about the partner support portal enrollment for CDC. Does the Twitter account need to be connected to a [cdc.gov](https://www.cdc.gov) email or is any account fine? Also, would there be any issues or complications stemming from flagging COVID misinformation on the portal using the existing [census.gov](https://www.census.gov) accounts that have access? We'll want to have at least some CDC accounts whitelisted, but that backup may be helpful in the short-term.

Let us know any next steps we can take to make sure CDC is all set with the portal.

Thanks,

[REDACTED]

Reingold

[REDACTED]

[reingold.com](https://www.reingold.com)

We're on a mission. ***Yours.***

From: [REDACTED]
Sent: Tuesday, May 11, 2021 8:50 AM
To: [REDACTED]@twitter.com>
Subject: RE: COVID Misinformation

Does it need to be the CDC account or my personal? If CDC, I'm going to have someone on staff enroll instead of me.

If personal is OK, it is: [REDACTED]

From: [REDACTED] <[REDACTED]@twitter.com>

Sent: Monday, May 10, 2021 8:51 PM

To: [REDACTED] <[REDACTED]@cdc.gov>

Cc: [REDACTED] <[REDACTED]@reingold.com>; [REDACTED] <[REDACTED]@reingold.com>; [REDACTED] <[REDACTED]@census.gov>; [REDACTED] <[REDACTED]@cdc.gov>

Subject: Re: COVID Misinformation

Hi [REDACTED] -

I'd be glad to enroll you in our Partner Support Portal, which allows you a special, expedited reporting flow in the Twitter Help Center. It worked very well with Census colleagues last year.

You need a Twitter account (and to be logged into that account) to access the Partner Support Portal. What account (or accounts) would you like me to enroll?

Best,
[REDACTED]

On Mon, May 10, 2021 at 5:05 PM [REDACTED] <[REDACTED]@cdc.gov> wrote:

[REDACTED] - I don't think we have info on how to enroll but we'd be happy to get on if you can send some info.

Thanks.

From: [REDACTED] <[REDACTED]@twitter.com>

Sent: Monday, May 10, 2021 3:02 PM

To: [REDACTED] <[REDACTED]@cdc.gov>

Cc: [REDACTED] <[REDACTED]@reingold.com>; [REDACTED] <[REDACTED]@reingold.com>; [REDACTED] <[REDACTED]@census.gov>; [REDACTED] <[REDACTED]@cdc.gov>

Subject: Re: COVID Misinformation

Hi [REDACTED] -

Thanks for sharing this - agree these are important trends to note; a quick scan shows that at least some of these have been previously reviewed and actioned. I will now ask the team to review the others.

[REDACTED] remind me: did you have a chance to enroll in our Partner Support Portal? In the future, that's the best way to get a spreadsheet like this reviewed.

Best,
[REDACTED]

On Mon, May 10, 2021 at 1:50 PM [REDACTED]@cdc.gov> wrote:

[REDACTED]

We wanted to point out two issues that we are seeing a great deal of misinfo about – vaccine shedding and microchips. The below are just some example posts. We do plan to post something shortly to address vaccine shedding and I can send that link soon. Our census team copied here, has much more info on it if needed.

Also, we are standing up a BOLO COVID misinformation meeting and inviting all tech platforms. We are shooting for 12pm EST on Friday for our first meeting. I'll include you on the invite but if you'd like to propose an alternative approach or would like to me include others, just let me know.

Thanks!

Post Text	Link
MAGNET STICKS TO AREA INJECTED BY THE VACCINE- ARE THE VACCINATED GETTING MICROCHIPPED? #justsayno	https
<p>The ex VP of Pfizer came out predicting that there will be a human depopulation of the vaccinated people in 2 years. An even shorter lifespan after the booster. He believes it's eugenics. Many scientists are corroborating this.</p> <p>I'll be alive!</p> <p>Experimental vaccines!</p>	https
THE BIG QUESTION IS WHY ARE THEY LYING...GOVERNMENTS SIGNED US AWAY TO NWO..DEPOPULATION..ALSO EXPERIMENTS IN AI..IN LAYMENS TERMS..TRYING TO TURN US INTO ROBOTS/ ANDROIDS....ALSO THEY WANT WORLD BANK OF OUR DNA .. VIA VAX	https
<p>Agreed. But if the science is being followed, there's an awful lot of evidence that the vax crowd are shedding...maybe the non-vaxxed are safer this way...thoughts</p> <p>@crislerwyo</p> <p>?</p>	https
COVID 'Vaccine Shedding', Evidence SARS-CoV-2 Spike Protein Can 'Alter Human Genes' & VAERS Truth	https
Thank Bill Gates for wanting depopulation. That's exactly what this vaccine is doing, and will continue to do over the next few years.	https
IM ALARMED BY THE AMOUNT OF WOMEN IN MY DM'S COMPLAINING ABOUT ABNORMAL BLEEDING AND MISCARRIAGES AFTER COMING IN CONTACT WITH SOMEONE WHOSE BEEN VACCINATED!!!!	https
Well hundreds of women on this page say they are having bleeding/ clotting after vaccination or that they bleed oddly being AROUND vaccinated women. Unconfirmed, needs more investigation. But lots of reports. COVID-19 Vaccine Side Effects	https

<p>[Links to: https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/]</p>	<p>https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/</p>
<p>So the #CDC now says that those who are "Fully Vaxed nated" can "Go outside & live freely" lol.. This is a joke .</p> <p>Quick questions for those who were experimented on I MEAN -Took the shot, what were the ingredients in it? You did ASK right? .. Also, do you know what SHEDDING is?</p>	<p>https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/</p>
<p>Here is the official Pfizer trail protocols Concerning shedding by the vaccinated Fertility (male and female) contraception to be compulsorily used because shedding Adverse events and serious adverse events reporting And much more Dangers ore known</p> <p>https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf</p>	<p>https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf</p>
<p>For those of you who have questions about Spiked Protein SHEDDING: Pfizer admits in its own mRNA vaxx trial documentation that non-vaxxed people can be ENVIRONMENTALLY EXPOSED to the shot's spike proteins by INHALATION or SKIN CONTACT.</p> <p>https://themostrbeautifulworld.com/blog/skin-contact-covid</p>	<p>https://themostrbeautifulworld.com/blog/skin-contact-covid</p>
<p>Pfizer acknowledges the existence of "SHEDDING" in their #mRNA vaccines, and is setting up this new trial to study these dangers.</p> <p>(Shedding is where unvaccinated people experience serious health issues just by being near to vaccinated people).</p> <p>https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf#page67</p>	<p>https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf#page67</p>



CAUTION: This message originated externally. Please use caution when clicking on links or opening attachments.

From: [REDACTED]@reingold.com]
Sent: 5/24/2021 2:28:00 PM
To: [REDACTED]@twitter.com
CC: [REDACTED]@cdc.gov]; [REDACTED]@reingold.com]; [REDACTED]@cdc.gov]
Subject: RE: COVID Misinformation

Hi [REDACTED],

I hope you had a good weekend. I'm following up about the partner support portal enrollment for CDC. Does the Twitter account need to be connected to a cdc.gov email or is any account fine? Also, would there be any issues or complications stemming from flagging COVID misinformation on the portal using the existing census.gov accounts that have access? We'll want to have at least some CDC accounts whitelisted, but that backup may be helpful in the short-term.

Let us know any next steps we can take to make sure CDC is all set with the portal.

Thanks,

[REDACTED]
Reingold
[REDACTED]

reingold.com

We're on a mission. **Yours.**

From: [REDACTED] (CDC/OD/OADC)
Sent: Tuesday, May 11, 2021 8:50 AM
To: [REDACTED]@twitter.com>
Subject: RE: COVID Misinformation

Does it need to be the CDC account or my personal? If CDC, I'm going to have someone on staff enroll instead of me.

If personal is OK, it is: @ [REDACTED]

From: [REDACTED]@twitter.com>
Sent: Monday, May 10, 2021 8:51 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@reingold.com>; [REDACTED]@reingold.com>; [REDACTED]@census.gov>; [REDACTED]@cdc.gov>
Subject: Re: COVID Misinformation

Hi [REDACTED],

I'd be glad to enroll you in our Partner Support Portal, which allows you a special, expedited reporting flow in the Twitter Help Center. It worked very well with Census colleagues last year.

You need a Twitter account (and to be logged into that account) to access the Partner Support Portal. What account (or accounts) would you like me to enroll?

Best,

On Mon, May 10, 2021 at 5:05 PM [REDACTED]@cdc.gov> wrote:

[REDACTED] - I don't think we have info on how to enroll but we'd be happy to get on if you can send some info.

Thanks.

From: [REDACTED]@twitter.com>

Sent: Monday, May 10, 2021 3:02 PM

To: [REDACTED]@cdc.gov>

Cc: [REDACTED]@reingold.com>; [REDACTED]@reingold.com> [REDACTED]

[REDACTED]@census.gov>; [REDACTED]@cdc.gov>

Subject: Re: COVID Misinformation

H [REDACTED] -

Thanks for sharing this - agree these are important trends to note; a quick scan shows that at least some of these have been previously reviewed and actioned. I will now ask the team to review the others.

[REDACTED] remind me: did you have a chance to enroll in our Partner Support Portal? In the future, that's the best way to get a spreadsheet like this reviewed.

Best.

On Mon, May 10, 2021 at 1:50 PM [REDACTED]@cdc.gov> wrote:

[REDACTED] -

We wanted to point out two issues that we are seeing a great deal of misinfo about - vaccine shedding and microchips. The below are just some example posts. We do plan to post something shortly to address vaccine shedding and I can send that link soon. Our census team copied here, has much more info on it if needed.

Also, we are standing up a BOLO COVID misinformation meeting and inviting all tech platforms. We are shooting for 12pm EST on Friday for our first meeting. I'll include you on the invite but if you'd like to propose an alternative approach or would like to me include others, just let me know.

Thanks!

Post Text	Link
<p>MAGNET STICKS TO AREA INJECTED BY THE VACCINE- ARE THE VACCINATED GETTING MICROCHIPPED? #justsayno</p>	<p>https://t</p>
<p>The ex VP of Pfizer came out predicting that there will be a human depopulation of the vaccinated people in 2 years. An even shorter lifespan after the booster. He believes it's eugenics. Many scientists are corroborating this.</p> <p>I'll be alive!</p> <p>Experimental vaccines!</p>	<p>https://t</p>
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<p>Agreed. But if the science is being followed, there's an awful lot of evidence that the vax crowd are shedding...maybe the non-vaxxed are safer this way...thoughts</p> <p>@crislerwyo</p> <p>?</p>	<p>https://t</p>
<p>COVID 'Vaccine Shedding', Evidence SARS-CoV-2 Spike Protein Can 'Alter Human Genes' & VAERSTruth</p>	<p>https://t</p>
<p>Thank Bill Gates for wanting depopulation. That's exactly what this vaccine is doing, and will continue to do over the next few years.</p>	<p>https://t</p>
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<p>https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf</p>	
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CAUTION: This message originated externally. Please use caution when clicking on links or opening attachments.

From: [REDACTED]@fb.com]
Sent: 5/20/2021 12:50:01 PM
To: [REDACTED]@cdc.gov]
CC: [REDACTED]@fb.com]
Subject: Re: Add a name: RE: CV19 misinfo reporting channel
Attachments: CDC-Onboarding-Deck.pdf; CDC_-How-to-report-through-Facebook-Government-Casework-Channel-1.pdf

Trying the PDF again – looks like it didn't attach.

From: [REDACTED]@fb.com>
Date: Thursday, May 20, 2021 at 12:49 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>
Subject: Re: Add a name: RE: CV19 misinfo reporting channel

Hi [REDACTED]

Attached is a PDF of our onboarding slides should you need to review as well as a how to guid.

In speaking with our technical teams, we think it's best for both Census and CDC to have an email alias / shared inbox that staff have access to for reporting – so that Census can have appropriate access to Covid portal as well.

If you have any questions about that, please do let us know!

From: [REDACTED]@cdc.gov>
Date: Wednesday, May 19, 2021 at 12:38 PM
To: [REDACTED]@fb.com>
Subject: Add a name: RE: CV19 misinfo reporting channel

Please add [REDACTED] to system access. [REDACTED]@cdc.gov.

From: [REDACTED]@fb.com>
Sent: Wednesday, May 12, 2021 11:21 AM
To: [REDACTED]@cdc.gov>; [REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Sure can.

[REDACTED]@cdc.gov>
Date: Wednesday, May 12, 2021 at 11:19 AM
To: [REDACTED]@fb.com>, [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>
Subject: RE: CV19 misinfo reporting channel

Ok, I'll send the appt and get a zoom. Then you can add on your folks.

From: [redacted]@fb.com>
Sent: Wednesday, May 12, 2021 11:06 AM
To: [redacted]@cdc.gov> [redacted]@fb.com>
Cc: [redacted]@com>
Subject: Re: CV19 misinfo reporting channel

Apologies for the bumpy transition with [redacted] out – do you all have a zoomgov requirement? And if so, would you hold the calendar invite for this? Or does Census?

From: [redacted]@fb.com>
Date: Wednesday, May 12, 2021 at 10:51 AM
To: [redacted]@cdc.gov>, [redacted]@fb.com>
Cc: [redacted]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Great! Thank you!

From: [redacted]@cdc.gov>
Date: Wednesday, May 12, 2021 at 10:50 AM
To: [redacted]@fb.com>, [redacted]@fb.com>
Cc: [redacted]@fb.com>
Subject: RE: CV19 misinfo reporting channel

Sorry, didn't realize you were awaiting a respond to your explanation. That time still works. Thanks!

But re-looking at this list, please only include these people as we've had change over since we started the chain:

- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]

From: [redacted]@com>
Sent: Wednesday, May 12, 2021 10:19 AM
To: [redacted]@cdc.gov> [redacted]@fb.com>
Cc: [redacted]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Bumping this calendar thread

From: [redacted]@fb.com>
Date: Monday, May 10, 2021 at 4:51 PM
To: [redacted]@cdc.gov>, [redacted]@fb.com>
Cc: [redacted]@fb.com>
Subject: Re: CV19 misinfo reporting channel

This would be for onboarding your teams to the misinfo casework / reporting channel

From: [REDACTED] <[REDACTED]@cdc.gov>
Date: Monday, May 10, 2021 at 4:04 PM
To: [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>
Cc: G [REDACTED] <[REDACTED]@fb.com>
Subject: RE: CV19 misinfo reporting channel

Time is good. I did ask [REDACTED] this embarrassing question. I had it in my head this was for Crowd Tangle. But on Thursday she explained it is for something else. Well, I didn't write it down and I'm honestly not sure what this is for. Sorry!

From: [REDACTED] <[REDACTED]@fb.com>
Sent: Monday, May 10, 2021 4:01 PM
To: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@cdc.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Thanks, [REDACTED]
So nice to meet you, [REDACTED]

Look likes Wednesday the 19th 12-1pm option works best for our folks.
Does that option still work for your side?

From: [REDACTED] <[REDACTED]@fb.com>
Date: Monday, May 10, 2021 at 3:28 PM
To: [REDACTED] <[REDACTED]@cdc.gov>, [REDACTED] <[REDACTED]@fb.com>
Cc: [REDACTED] <[REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Hi [REDACTED]

[REDACTED] just went on maternity leave. We are very excited for her and her new addition!
As such, we didn't want you to be a surprised that [REDACTED] will pick up on the threads where [REDACTED] was leading starting today.

That will include this one with scheduling training for the government case work project.

Best,

From: [REDACTED] <[REDACTED]@cdc.gov>
Date: Monday, May 10, 2021 at 12:25 PM
To: [REDACTED] <[REDACTED]@fb.com>
Cc: P [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>
Subject: RE: CV19 misinfo reporting channel

I'm so sorry – I'm out all day May 17 for a medical thing, can we pick another one? My fault!

From: [REDACTED] <[REDACTED]@fb.com>
Sent: Friday, May 7, 2021 11:27 AM
To: [REDACTED] <[REDACTED]@cdc.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Hi [REDACTED] – Following up from our meeting yesterday. It looks like Monday, May 17th at 12:00pm will work for onboarding meeting. The overlaps with your standing Census meeting you mentioned. We will plan to invite the email addresses below (those being onboarded).

Please let me know if any flags on your end.

Best,

[REDACTED]



Genelle Quarles Adrien
Politics & Government Outreach
e: genelleadrien@fb.com | w: [facebook.com/gpa](https://www.facebook.com/gpa)

From: [REDACTED] <[REDACTED]@cdc.gov>
Date: Tuesday, April 27, 2021 at 11:21 AM
To: [REDACTED] <[REDACTED]@fb.com>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: RE: CV19 misinfo reporting channel

Ugh, so sorry I missed this. It looks correct but I think so might have access already, but not sure.

From: [REDACTED] <[REDACTED]@fb.com>
Sent: Tuesday, April 27, 2021 11:05 AM
To: [REDACTED] <[REDACTED]@cdc.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Hi [REDACTED] – Hope the week is off to a good start. I wanted to bump this and see if you had any edits/additions to the onboarding list below.

Let us know if you have any questions.

Best,

[REDACTED]

From: [REDACTED] <[REDACTED]@fb.com>
Date: Tuesday, April 13, 2021 at 3:50 PM
To: [REDACTED] <[REDACTED]@cdc.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: CV19 misinfo reporting channel

Hi [REDACTED] - Hope the week is off to a good start. We're working to get our COVID-19 misinfo channel up for CDC and Census colleagues. Could you kindly confirm if the below emails are correct for onboarding to the reporting channel and if there are others you'd like to include?

Please let me know if you have any questions.

Thank you!

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

GOV

 The linked image

[REDACTED]

From: [redacted]@twitter.com]
Sent: 5/11/2021 9:27:53 AM
To: [redacted]@cdc.gov]
Subject: Re: COVID Misinformation

Your account works fine. I'll proceed with processing your enrollment.

On Tue, May 11, 2021 at 8:50 AM [redacted]@cdc.gov> wrote:

Does it need to be the CDC account or my personal? If CDC, I'm going to have someone on staff enroll instead of me.

If personal is OK, it is: [redacted]

From: [redacted]@twitter.com>
Sent: Monday, May 10, 2021 8:51 PM
To: [redacted]@cdc.gov>
Cc: [redacted]@reingold.com>; [redacted]@cdc.gov>; [redacted]@census.gov>; [redacted] (C)
Subject: Re: COVID Misinformation

Hi [redacted]
I'd be glad to enroll you in our Partner Support Portal, which allows you a special, expedited reporting flow in the Twitter Help Center. It worked very well with Census colleagues last year.

You need a Twitter account (and to be logged into that account) to access the Partner Support Portal. What account (or accounts) would you like me to enroll?

Best,
[redacted]

On Mon, May 10, 2021 at 5:05 PM [redacted]@cdc.gov> wrote:

[redacted] - I don't think we have info on how to enroll but we'd be happy to get on if you can send some info.

Thanks.

From: [redacted]@twitter.com>
Sent: Monday, May 10, 2021 3:02 PM
To: [redacted]@cdc.gov>
Cc: [redacted]@reingold.com>; [redacted]@reingold.com>; [redacted]@census.gov>; [redacted]

[REDACTED]@cdc.gov>

Subject: Re: COVID Misinformation

Hi [REDACTED]
Thanks for sharing this - agree these are important trends to note; a quick scan shows that at least some of these have been previously reviewed and actioned. I will now ask the team to review the others.

[REDACTED] remind me: did you have a chance to enroll in our Partner Support Portal? In the future, that's the best way to get a spreadsheet like this reviewed.

Best.
[REDACTED]

On Mon, May 10, 2021 at 1:50 PM [REDACTED]@cdc.gov> wrote:

We wanted to point out two issues that we are seeing a great deal of misinfo about – vaccine shedding and microchips. The below are just some example posts. We do plan to post something shortly to address vaccine shedding and I can send that link soon. Our census team copied here, has much more info on it if needed.

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Thanks!

Post Text

MAGNET STICKS TO AREA INJECTED BY THE VACCINE- ARE THE VACCINATED GETTING MICROCHIPPED? #justsayno

The ex VP of Pfizer came out predicting that there will be a human depopulation of the vaccinated people in 2 years. An even shorter lifespan after the booster. He believes it's eugenics. Many scientists are corroborating this.

I'll be alive!

⊙Experimental vaccines!

THE BIG QUESTION IS WHY ARE THEY LYING...GOVERNMENTS SIGNED US AWAY TO NWO..DEPOPULATION..ALSO EXPERIMENTS IN AL.IN LAYMENS TERMS..TRYING TO TURN US INTO ROBOTS/ ANDROIDS....ALSO THEY WANT WORLD BANK OF OUR DNA .. VIA VAX

Agreed. But if the science is being followed, there's an awful lot of evidence that the vax crowd are shedding...maybe the non-vaxxed are safer this way...thoughts

@crislerwyo

?

COVID 'Vaccine Shedding', Evidence SARS-CoV-2 Spike Protein Can 'Alter Human Genes' & VAERS Truth

Thank Bill Gates for wanting depopulation. That's exactly what this vaccine is doing, and will continue to do over the next few years.

IM ALARMED BY THE AMOUNT OF WOMEN IN MY DM'S COMPLAINING ABOUT ABNORMAL BLEEDING AND MISCARRIAGES AFTER COMING IN CONTACT WITH SOMEONE WHOSE BEEN VACCINATED!!!!

Well hundreds of women on this page say they are having bleeding/ clotting after vaccination or that they bleed oddly being AROUND vaccinated women. Unconfirmed, needs more investigation. But lots of reports. COVID-19 Vaccine Side Effects

[Links to: <https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/>]

So the #CDC now says that those who are "Fully Vaxxed" can "Go outside & live freely" lol.. This is a joke

Quick questions for those who were experimented on I MEAN-Took the shot, what were the ingredients in it? You did ASK right? .. Also, do you know what SHEDDING is?

Here is the official Pfizer trial protocols
Concerning shedding by the vaccinated
Fertility (male and female)
contraception to be compulsorily used because shedding
Adverse events and serious adverse events reporting
And much more
Dangers ore known

https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf

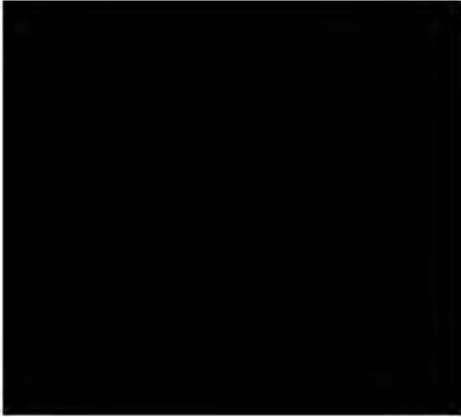
For those of you who have questions about Spiked Protein SHEDDING: Pfizer admits in its own mRNA vaxx trial documentation that non-vaxxed people can be ENVIRONMENTALLY EXPOSED to the shot's spike proteins by INHALATION or SKIN CONTACT.

<https://themostbeautifulworld.com/blog/skin-contact-covid>

Pfizer acknowledges the existence of "SHEDDING" in their mRNA vaccines, and is setting up this new trial to study these dangers.

(Shedding is where unvaccinated people experience serious health issues just by being near to vaccinated people).

https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf#page67



From: [REDACTED] (CDC/OD/OADC) [REDACTED]
Sent: 3/31/2021 2:23:11 PM
To: [REDACTED]@fb.com]
Subject: RE: This week's meeting

Got it, thanks.

From: [REDACTED]@fb.com>
Sent: Wednesday, March 31, 2021 2:18 PM
To: [REDACTED]@cdc.gov>
Subject: Re: This week's meeting

Hi [REDACTED]

We are working on a proposal of how set up sharing partnership on the misinform items...what it would look like.... so we can discuss Thursday.

Lots of team members out the last two weeks due to all the holidays, but that is the plan so we can discuss on the Thursday call.

From: [REDACTED]@cdc.gov>
Date: Wednesday, March 31, 2021 at 2:07 PM
To: [REDACTED]@fb.com>
Subject: RE: This week's meeting

Can you explain what you originally meant when you said this "will know in a few hours (I am told if we have a plan to present for Census Thursday or if it needs more work)". I'm still a bit confused.

But here is what Census mentioned that they would like to discuss:

- It looks like the posts from last week's deck about infertility and side effects have all been removed. Were those re-evaluated by the moderation team or taken down for another reason?
- One of the main themes we're seeing and from the CrowdTangle report is local news coverage of deaths after receiving the vaccine. What's the approach for adding labels to those stories?
 - [Example: No label](#)
 - [Example: Label that links to WHO](#)
- Can we add the Census team to CrowdTangle?
- How should we best engage regularly going forward on the Census/CDC reports.

Thanks.

From: [REDACTED]@fb.com>
Sent: Tuesday, March 30, 2021 7:46 PM
To: [REDACTED]@cdc.gov>
Subject: Re: This week's meeting

Hi [REDACTED]

Yes, I think good to have questions from Census so we make sure we have the right person.

I can ask [REDACTED] to join again so she can be asked questions/provide more information about influencers and I have noted your question about removals and will tee that up as well.

What you have below is a pretty full agenda so I will start to shape it based on what you have below.

From: [REDACTED] <[REDACTED]@cdc.gov>
Date: Tuesday, March 30, 2021 at 7:38 PM
To: [REDACTED] <[REDACTED]@fb.com>
Subject: RE: This week's meeting

The CDC team mentioned to me that they would like to have more info from [REDACTED] about what is being done on the amplification-side and gain a better understanding how FB is working with influencers. The team is still interested in more info on how you analyze the data on removals, etc. I didn't ask Census if they had questions...but I know they were hoping to go over the deck they had and discuss how to engage on a more regular basis. I'm not sure what you all are preparing for them? (that might have slipped my mind from last week, sorry if so).

Thanks!

From: [REDACTED] <[REDACTED]@fb.com>
Sent: Tuesday, March 30, 2021 3:16 PM
To: [REDACTED] <[REDACTED]@cdc.gov>
Subject: Re: This week's meeting

Hi [REDACTED]

Yes, I did see and will know in a few hours (I am told if we have a plan to present for Census Thursday or if it needs more work) and it would be great to have questions that may not have been answered from your team on misinfo. That team is very busy so it's a good opportunity to did deeper on that topic and especially if there are areas that are still unclear or the teams have concerns about.

I will stand by.

Best,
[REDACTED]

From: [REDACTED] <[REDACTED]@cdc.gov>
Date: Tuesday, March 30, 2021 at 3:08 PM
To: [REDACTED] <[REDACTED]@fb.com>
Subject: RE: This week's meeting

Hope all is well too. I plan to join and listen in to the 3:30 meeting, FYI.

I added this part in yellow to our chain on turn.io so you probably missed it, did you have thoughts on how we can regularly meet with Census? I will also check back with others to see if they have other Qs that that were unanswered and get back to you.

So in follow up to today's meeting -- besides discussing things in more depth next Thur, am I correct that your team is going to consider how you might want to engage with the CDC/Census team routinely and get back to us? I'd be fine with using our existing time for this regular discussion if that end up working out best. I don't quite have a good vision yet on how it will work but I know you all have experience with Census already.

From: [REDACTED]@fb.com>
Sent: Tuesday, March 30, 2021 2:42 PM
To: [REDACTED]@cdc.gov>
Subject: This week's meeting

Hi [REDACTED]

Hope all is well...as it can be. At least Spring is making an appearance. I wanted to surface any misinfo questions your team may have for the team that I had briefing last time. They are available to attend again, but also want to make sure we are answering any of your team's questions.

Best,

[REDACTED]

FACEBOOK

[REDACTED]

From: [REDACTED] (CDC/OD/OADC) [REDACTED]
Sent: 3/25/2021 11:33:00 AM
To: [REDACTED] fb.com]
CC: [REDACTED] fb.com]
Subject: RE: Thursday meeting
Attachments: CDC_Facebook Misinformationv2 .pptx

Sorry for delay in sending. This is a deck Census would like to discuss and we'd also like to fit in a discussion of topic types removed from Facebook.

Here are the primary attendees on our end (I'm sure we'll have a larger crowd).

Census partners:

[REDACTED]

CDC:

[REDACTED]

From: [REDACTED]@fb.com>
Sent: Wednesday, March 24, 2021 12:26 PM
To: [REDACTED] cdc.gov>
Subject: Re: Thursday meeting

That's correct Carol. No CMU Thursday.

We will have [REDACTED] (Misinformation Manager), [REDACTED] (will be leading from our side on misinformation briefing for your team. They all work on our COVID-19 policies.

Who will be your leads? [REDACTED] and others? Do they have titles?

Best,

[REDACTED]

From: [REDACTED] cdc.gov>
Date: Wednesday, March 24, 2021 at 7:52 AM
To: [REDACTED] fb.com>
Subject: RE: Thursday meeting

Ok, I'm sorry I wasn't free yesterday – one of those days! This sounds good and I'll assume CMU info isn't coming up so I want include that group in the meeting.

I am not has booked up today if we still need to chat.

Thanks!

From: [REDACTED] <[REDACTED]@fb.com>
Sent: Wednesday, March 24, 2021 4:24 AM
To: [REDACTED] <[REDACTED]@cdc.gov>
Subject: Thursday meeting

Hi [REDACTED]

As we discussed last week, we will present on COVID-19 misinformation this session/meeting and have some of our team that is focused on that workstream provide a briefing on the current policies and approach as well as the current trends we are identifying.

Best,

[REDACTED]

Get [Outlook for iOS](#)

From: [REDACTED]@fb.com]
Sent: 2/20/2020 7:10:39 PM
To: [REDACTED]@cdc.gov]
CC: [REDACTED]@cdc.gov]
Subject: Re: FB Coordination

That is great news!

Let me ask if we plan to do anything in addition to the blog post our head of health policy wrote to position our work.

So far we have our blog: <https://about.fb.com/news/2020/01/coronavirus/>

Best,

[REDACTED]
Sent from my iPhone

On Feb 20, 2020, at 6:39 PM, [REDACTED]@cdc.gov> wrote:

[REDACTED]—
Is Facebook saying anything in the press or other communications about this activity that we should cite if we are asked questions about the quick promotions?

By the way, we are seeing a ton of referred web traffic from the promotions.

Thanks.

From: [REDACTED]@fb.com>
Sent: Wednesday, February 19, 2020 11:54 AM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@cdc.gov>
Subject: Re: FB Coordination

Hi [REDACTED],

5% of QPS launched over the weekend (to test) and the rest will be launched tonight. So by tomorrow, QPs will be fully launched.

The hub is on track to launch in some countries in early March. We plan to include the US in that March distro. Hope this helps.

Best [REDACTED]

Sent from my iPhone

On Feb 17, 2020, at 12:45 PM, [REDACTED] <[REDACTED]@cdc.gov> wrote:

Hi [REDACTED] Just circling back to see if there are any updates on the coronavirus quick promotion or hub pages we had talked about?

Thanks for any update!

[REDACTED]
U.S. Centers for Disease Control and Prevention

[REDACTED]
<image001.gif>
Follow us on [Twitter](#)
<image002.gif>
Join us on [Facebook](#)

From: [REDACTED] <[REDACTED]@cdc.gov>
Sent: Friday, February 7, 2020 10:43 AM
To: [REDACTED] <[REDACTED]@fb.com>
Cc: [REDACTED] <[REDACTED]@cdc.gov>
Subject: RE: FB Coordination

Sorry for delay. Many are involved in comms on this issue and wanted to be certain we are aligned.

1. <!--[if !supportLists]--><!--[endif]--> If you can do something with CDC for US users, we think there is great value in having messages **now** especially on the current risk level and everyday precautions. As well, if we can rotate messages, there could be times we might want to address widespread myths like mask use or new issues. This could and should replace flu shot messaging. What do you need from us? We need a reminder on message length, if graphics are used, and how often we can review and change content.

2& 3. This is great, we'd love to be a part of it. US users will need information directly from CDC and other federal/local organizations rather than international organizations. Let us know what you need.

If we need to use CDC logos we'll need to do a MOU again. But if not, we may not need to be so formal, at least on our end.

After today, I'll be out for next week but Jay will be following up on any CDC action items.

Thanks!

From: [REDACTED]@fb.com>
Sent: Thursday, February 6, 2020 3:35 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@cdc.gov>
Subject: Re: FB Coordination

Here is a bit more insight [REDACTED]:

Let me know if you would like to speak to our teams working on these items.

Our teams at Facebook have been working to identify how we can support efforts to provide users with accurate and timely information about coronavirus. We would like to get CDC's feedback on a few key initiatives that we are considering launching in the coming days/weeks. I have outlined the specifics below, and would greatly appreciate your thoughts on the tactics and proposed design/content. We would be happy to jump on a quick call today or tomorrow if that would be easier as well.

Thank you in advance, and look forward to your input.

1. **Quick Promotion for US Facebook Users:** We are considering launching "Quick Promotions" which are proactive messages at the top of the News Feed to users in various countries about how to protect yourself from coronavirus. We would point users to credible websites including the WHO internationally, and the CDC in the US. We'd like your feedback on: 1) whether you think this would be beneficial to launch in the US at this time, and 2) if this should take priority over the Quick Promotion message to get the flu shot, where we are also directing users to CDC pages, particularly given that we're approaching the end of flu season
2. **Facebook Coronavirus Page:** Facebook team would create a Coronavirus Page serving up content that exists on other organizations' FB pages including the CDC. This would be in addition to the Quick Promotion above. When users search for information on coronavirus, they will find this centralized page with curated content from trusted sources. See mock below:

<image004.jpg>

3. **Facebook Coronavirus "Hub":** Facebook would create a coronavirus "hub" which would contain various modules including pages to follow, fundraisers that are happening on the platform related to coronavirus, and potentially a common set of FAQs. See below for early design mocks:

<image006.jpg>

Best,

From: [REDACTED]@cdc.gov>
Date: Thursday, February 6, 2020 at 3:01 PM
To: [REDACTED]@fb.com>
Cc: "[REDACTED]@cdc.gov">
Subject: FB Coordination

[REDACTED] – just looping you in on something that Jay and I had awareness of...are you in loop with this?

From: [REDACTED]@fb.com>

Sent: Thursday, February 6, 2020 3:34 PM

To: [REDACTED]@state.gov>

Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>

Subject: Urgent partner feedback needed on Corona virus response

Dear [REDACTED],

As you may be already aware, Facebook has taken proactive as well as reactive steps to control information and misinformation related to Corona virus which includes links to WHO page as well as removal of misinformation.

At Mark Zuckerberg's request, there is a group that has been organized to help generate and implement new ideas "offense" approach on how FB can assist in the global response to the Coronavirus. This group met on Friday, brainstormed and proposed a list of prioritized ideas to Mark. Mark supported further exploration and go forward on the following ideas. As an immediate next step, our team has been asked to solicit quick, high-level partner feedback on these ideas.

Pragmatic [Confirmed to Explore]

- 1. Coronavirus Page on Facebook:** A centralized page with curated and localized content from trusted sources. This info is currently fragmented and hard for the public to understand. It would be helpful to have canonical real-time info on (a) updates relevant to your location (b) what to do to stay healthy and (c) how and when to seek medical help. Encourage people to take action by sharing this page.
- 2. Influencer Engagement Campaign:** Enlist celebrities, major NGOs, government officials, and other public figures to use the Coronavirus stickers and link to the Coronavirus Facebook Page to build awareness of accurate information.
- 3. Coronavirus Support Stickers on Facebook, Instagram, and Messenger Stories (mock here):** Allow people to show their support for people affected by coronavirus. On Instagram, the sticker could link out to the Coronavirus Page on Facebook (link out not available on Facebook and Messenger.)

I would greatly appreciate a feedback response so we can move forward etih this and if there is any other way we can support you please let me know.

Warmly,

[REDACTED]

From: [REDACTED]@fb.com]
Sent: 2/6/2020 7:50:41 PM
To: [REDACTED]@cdc.gov]
CC: [REDACTED]@cdc.gov]
Subject: Re: FB Coordination

Hi [REDACTED]

To clarify, the items I sent a short while ago below are not ads or have any monetary component. These are online items we are looking at launching based on requests from regions hit by this issue. For the US context, we want to know if there are concerns or items that CDC would suggest tweaking. That would be good for us to know to inform our next steps.

Please let me know your team's thoughts as teams are rapidly collecting input to ensure any public messaging is complementary.

Best,

[REDACTED]
Sent from my iPhone

On Feb 6, 2020, at 3:35 PM, [REDACTED]@fb.com> wrote:

Here is a bit more insight [REDACTED]:

Let me know if you would like to speak to our teams working on these items.

Our teams at Facebook have been working to identify how we can support efforts to provide users with accurate and timely information about coronavirus. We would like to get CDC's feedback on a few key initiatives that we are considering launching in the coming days/weeks. I have outlined the specifics below, and would greatly appreciate your thoughts on the tactics and proposed design/content. We would be happy to jump on a quick call today or tomorrow if that would be easier as well.

Thank you in advance, and look forward to your input.

- 1. Quick Promotion for US Facebook Users:** We are considering launching "Quick Promotions" which are proactive messages at the top of the News Feed to users in various countries about how to protect yourself from coronavirus. We would point users to credible websites including the WHO internationally, and the CDC in the US. We'd like your feedback on: 1) whether you think this would be beneficial to launch in the US at this time, and 2) if this should take priority over the Quick Promotion message to get the flu shot, where we are also directing users to CDC pages, particularly given that we're approaching the end of flu season
- 2. Facebook Coronavirus Page:** Facebook team would create a Coronavirus Page serving up content that exists on other organizations' FB pages including the CDC. This would be in addition to the Quick Promotion above. When users search for information on coronavirus, they will find this centralized page with curated content from trusted sources. See mock below:

<image001.jpg>

- 3. Facebook Coronavirus "Hub":** Facebook would create a coronavirus "hub" which would contain various modules including pages to follow, fundraisers that are happening on the platform related to coronavirus, and potentially a common set of FAQs. See below for early design mocks:

<image002.jpg>

Best,

[REDACTED]

From: [REDACTED]@cdc.gov>
Date: Thursday, February 6, 2020 at 3:01 PM
To: [REDACTED]@fb.com>
Cc: "[REDACTED]@cdc.gov">
Subject: FB Coordination

[REDACTED] – just looping you in on something that Jay and I had awareness of...are you in loop with this?

From: [REDACTED]@fb.com>
Sent: Thursday, February 6, 2020 3:34 PM
To: [REDACTED]@state.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Urgent partner feedback needed on Corona virus response

Dear [REDACTED]

As you may be already aware, Facebook has taken proactive as well as reactive steps to control information and misinformation related to Corona virus which includes links to WHO page as well as removal of misinformation.

At Mark Zuckerberg's request, there is a group that has been organized to help generate and implement new ideas "offense" approach on how FB can assist in the global response to the Coronavirus. This group met on Friday, brainstormed and proposed a list of prioritized ideas to Mark. Mark supported further exploration and go forward on the following ideas. As an immediate next step, our team has been asked to solicit quick, high-level partner feedback on these ideas.

Pragmatic [Confirmed to Explore]

1. **Coronavirus Page on Facebook:** A centralized page with curated and localized content from trusted sources. This info is currently fragmented and hard for the public to understand. It would be helpful to have canonical real-time info on (a) updates relevant to your location (b) what to do to stay healthy and (c) how and when to seek medical help. Encourage people to take action by sharing this page.

2. **Influencer Engagement Campaign:** Enlist celebrities, major NGOs, government officials, and other public figures to use the Coronavirus stickers and link to the Coronavirus Facebook Page to build awareness of accurate information.

3. **Coronavirus Support Stickers on Facebook, Instagram, and Messenger Stories** (**mock [here](#)**): Allow people to show their support for people affected by coronavirus. On Instagram, the sticker could link out to the Coronavirus Page on Facebook (link out not available on Facebook and Messenger.)

I would greatly appreciate a feedback response so we can move forward etih this and if there is any other way we can support you please let me know.

Warmly,



From: [REDACTED]@microsoft.com]
Sent: 2/17/2022 1:14:47 PM
To: [REDACTED]@cisa.dhs.gov]
Subject: RE: Connection Request: Department of Treasury

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Send em to me. I will make sure [REDACTED] is looped in.

From: [REDACTED]@cisa.dhs.gov>
Sent: Thursday, February 17, 2022 1:05 PM
To: [REDACTED]@microsoft.com>
Subject: [EXTERNAL] FW: Connection Request: Department of Treasury

Is it you?

From: [REDACTED]@cisa.dhs.gov>
Sent: Thursday, February 17, 2022 12:57 PM
To: [REDACTED]@microsoft.com; [REDACTED]@microsoft.com>
Cc: [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>
Subject: Connection Request: Department of Treasury

Hi [REDACTED],

I hope this email finds you well. The Department of Treasury has asked our team for appropriate POCs to discuss social media and influence matters. We'd like to make the connection to Microsoft if you're amenable? This is somewhat time-sensitive, so thanks in advance for your attention to this matter.

If there's another POC this should be routed to, please let us know!

All my best,

[REDACTED]
National Risk Management Center
Cybersecurity and Infrastructure Security Agency
[REDACTED]



From: [REDACTED]@state.gov
Sent: 5/3/2021 5:35:55 PM
To: [REDACTED]@fb.com]; [REDACTED]@state.gov]; [REDACTED]
 [REDACTED]@cisa.dhs.gov]
CC: [REDACTED]@associates.cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov];
 [REDACTED]@hq.dhs.gov]; [REDACTED]@state.gov]; [REDACTED]
 [REDACTED]@state.gov]; [REDACTED]@fb.com]; [REDACTED]@state.gov]
Subject: Speaker details: May 11 Africa CSIRT workshop on disinformation / misinformation
Attachments: CSIRT Workshop.ics

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Hello [REDACTED]

We're looking forward to having you speak at the workshop on disinformation and misinformation for African CSIRTs next Tuesday! Here are some logistics and a draft run of show for the event:

1) Dial-in Information: I am attaching an .ics file for your calendars. (To recap, date and time are May 11 at 9:00 a.m. EDT.) We will be hosting this event on Cisco Webex here:

Meeting link: [REDACTED]

Meeting number: [REDACTED]

Password: [REDACTED]

2) Attendance: We have invited staff from the participating CSIRTs and told them they are free to forward the invitation to others in their governments, so long as any additional attendees complete [a registration form](#). We will also forward the event link to staff at the relevant U.S. Embassies. If anyone else from your organizations would like to attend as observers, please let us know. We are not sharing the registration link online or on social media.

3) Recording: If you have not already done so through other channels, please reply to this email to confirm if you are OK having the initial presentations be recorded. We will turn off the recording once we go into Q&A and discussion, but we thought the overview presentations might be helpful to share with participating CSIRTs after the fact. (We do not plan to post the recording publicly, and we will reconfirm your consent if we want to do that in the future.)

4) Notional run of show: Please take a look and reply all if you have any suggested changes.

- Introductions: [REDACTED] (State Department Office of the Cyber Coordinator), 5 minutes
- Opening remarks. [REDACTED] (GEC Tech Engagement Team), 5-10 minutes
 - GEC's role, resources available for CSIRTs and civil society organizations
- Presentation 1: the CSIRT perspective. [REDACTED] (DHS/CISA), 10-15 minutes
 - How can CSIRTs assess foreign disinformation / misinformation campaigns in their societies?
 - What responses are available to them?
 - How can they partner effectively with private sector and civil society actors?
- Presentation 2: the platform perspective. [REDACTED] (Facebook), 10-15 minutes
 - How does Facebook work with governments to address misinformation and disinformation?

- What categories of content are disallowed under Facebook's terms of service? (And what content is often objected-to but allowed on Facebook?)
- What information should CSIRTs send to platform companies when they see content they believe violates terms of service? How can they submit this information?
- Q&A: [REDACTED] will moderate, opening with topics drawn from the registration survey, then offering participants a chance to ask questions live. Panelists may also ask questions of participants. 30-40 minutes.
- Conclusion. [REDACTED] to moderate, panelists may offer concluding thoughts. 5 minutes.

5) Additional materials: If you have any materials you think would be useful to share with participating CSIRTs, please send them to me and [REDACTED] (CCed). We'll compile and share. Please keep in mind our overall goal with this event, to make sure the information we're sharing is appropriate for CSIRTs that have fewer staff and smaller budgets than US-CERT.

Thanks, and please let us know if you have any questions that weren't addressed above.

[REDACTED] (on behalf of the Office of Cyber Issues)

[REDACTED]
Office of the Coordinator for Cyber Issues
Department of State

From: [REDACTED]@twitter.com]
Sent: 2/17/2022 2:53:38 PM
To: [REDACTED]@cisa.dhs.gov]
CC: [REDACTED]@twitter.com]; [REDACTED]@twitter.com]; [REDACTED]@twitter.com]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]
Subject: Re: Connection Request: Dept. of Treasury

Sounds good. Thanks, [REDACTED].

On Thu, Feb 17, 2022 at 11:51 AM [REDACTED]@cisa.dhs.gov> wrote:

Thanks [REDACTED]. Appreciate the introductions to [REDACTED] and [REDACTED], we'll update our records accordingly.

We're going to pass your info to Treasury. They will reach-out directly to begin the dialogue and provide more information about the nature of this request.

Note this is important but not meeting a life/death threshold, so I suspect an email exchange vice a meeting will be sufficient for today.

[REDACTED]

National Risk Management Center
Cybersecurity and Infrastructure Security Agency

[REDACTED]



From: [REDACTED]@twitter.com>
Sent: Thursday, February 17, 2022 2:06 PM
To: [REDACTED]@cisa.dhs.gov>; [REDACTED]@twitter.com>; [REDACTED]
[REDACTED]@twitter.com>
Cc: [REDACTED]@twitter.com
Subject: Re: Connection Request: Dept. of Treasury

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Hi [REDACTED]

Thanks for reaching out - and for the additional context that there's something time-sensitive here.

In terms of broad engagement with Treasury: Adding [REDACTED] (who leads our policy legal team following [REDACTED]'s departure) and [REDACTED] (who leads our Safety, Content, and Law Enforcement legal team). Between the three of us, and Twitter's Public Policy team in DC, we can likely figure out the right contact here. Feel free to make an introduction to the 3 of us and we can go from there.

To help calibrate on timing: Do you have a sense of whether the urgency here is life-or-death/national-security impacting, or just important? Calendars are pretty complicated across the board here - so want to understand if we need to plan to clear other appointments (i.e. Treasure needs to talk today).

Thanks,

[REDACTED]

On Thu, Feb 17, 2022 at 10:58 AM [REDACTED] <[\[REDACTED\]@cisa.dhs.gov](mailto:[REDACTED]@cisa.dhs.gov)> wrote:

Hi [REDACTED]

Apologies for the second ping. I see [REDACTED] is no longer with the team, so if there are others I should loop in, let me know.

Separately, this is somewhat time-sensitive, so thanks for your quick attention here! Let me know if you have any questions.

Best,

[REDACTED]

National Risk Management Center
Cybersecurity and Infrastructure Security Agency

[REDACTED]



From: [REDACTED]
Sent: Thursday, February 17, 2022 9:35 AM
To: [REDACTED] <[\[REDACTED\]@twitter.com](mailto:[REDACTED]@twitter.com)>; [REDACTED] <[\[REDACTED\]@twitter.com](mailto:[REDACTED]@twitter.com)>
Cc: [REDACTED] <[\[REDACTED\]@cisa.dhs.gov](mailto:[REDACTED]@cisa.dhs.gov)>; [REDACTED] <[\[REDACTED\]@cisa.dhs.gov](mailto:[REDACTED]@cisa.dhs.gov)>; [REDACTED] <[\[REDACTED\]@cisa.dhs.gov](mailto:[REDACTED]@cisa.dhs.gov)>

[Redacted]@cisa.dhs.gov>

Subject: Connection Request: Dept. of Treasury

Hi [Redacted],

I hope this email finds you well. The Department of Treasury has asked our team for appropriate POCs to discuss social media and influence matters. We'd like to make the connection to Twitter if you're amenable?

Thanks in advance.

All my best,

[Redacted]

National Risk Management Center
Cybersecurity and Infrastructure Security Agency

[Redacted]



Sent: 2/17/2022 1:45:55 PM
To: [REDACTED]@fb.com]
CC: [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]
Subject: RE: Connection Request: Dept. of Treasury

[REDACTED]

National Risk Management Center
Cybersecurity and Infrastructure Security Agency

[REDACTED]



From: [REDACTED]
Sent: Thursday, February 17, 2022 9:29 AM
To: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Cc: [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>
Subject: Connection Request: Dept. of Treasury

Greeting [REDACTED]

I hope this email finds you well and thanks again for sending along the CIB report yesterday. The Deputy Secretary at Treasury would like to be connected to industry partners to discuss potential influence operations on social media. We'd like to make the connection to Meta if you're amenable?

Thanks in advance.

All my best,

[REDACTED]

National Risk Management Center
Cybersecurity and Infrastructure Security Agency

[REDACTED]



From: [REDACTED]@state.gov]
Sent: 5/10/2021 9:45:19 PM
To: [REDACTED]@fb.com]
CC: [REDACTED]@cisa.dhs.gov]; [REDACTED]@state.gov]; [REDACTED]
[REDACTED]@associates.cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]
[REDACTED]@hq.dhs.gov]; [REDACTED]@state.gov]; [REDACTED]
[REDACTED]@state.gov]; [REDACTED]@fb.com]; [REDACTED]@state.gov]
Subject: Re: Speaker details: May 11 Africa CSIRT workshop on disinformation / misinformation

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Great! See you all tomorrow morning.

From: [REDACTED]@fb.com>
Sent: Monday, May 10, 2021 9:27 PM
To: [REDACTED]@state.gov>
Cc: [REDACTED]@cisa.dhs.gov>; [REDACTED]@state.gov>; [REDACTED]
[REDACTED]@associates.cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>; [REDACTED]
[REDACTED]@hq.dhs.gov>; [REDACTED]@state.gov>; [REDACTED]@state.gov>;
[REDACTED]@fb.com>; [REDACTED]@state.gov>
Subject: Re: Speaker details: May 11 Africa CSIRT workshop on disinformation / misinformation

Hey y'all - sorry for the slow response, have been on the road most of today.

Totally okay with recording for the initial preso, and sounds good to have that off for QA as I can be more candid :)

Looking forward to the chat tomorrow!

Sent from my iPhone

On May 10, 2021, at 4:27 PM, [REDACTED]@state.gov> wrote:

Hello all,

One more set of answers from participants, these in response to the question: "What topics do you hope the workshop will cover?" (Lightly edited for clarity and to reduce duplication.)

- How to combat mis and disinformation. How to mitigate it once viral. How to educate people on its consequences.
- Best practices for combatting fake news (regulatory, organizational, and technical). Case studies demonstrating best practices.
- Information sharing platforms.
- How to identify fake news and legitimate websites.
- Slow response to incidences escalated to service providers, lack of clear guidelines on defamation, lack of responsive communication channels.

- Fact checking techniques, how to identify disinformation and misinformation
- Proven techniques to take down these articles. The effectiveness of fake news checkers.
- Ways to mitigate misinformation and disinformation on platforms that are not physically present in my jurisdiction. Working with victims.
- Fact-checking. Steps for stopping already-circulating misinformation. Tracking the original source of the information.
- International takedown requests.

I know it's likely too late in the game to make major updates to what you're planning to cover, but wanted to share these to give you a sense of what participants will raise in Q&A.

Thanks,

From: [REDACTED]@state.gov>

Sent: Monday, May 10, 2021 4:11 PM

To: [REDACTED]@cisa.dhs.gov> [REDACTED]@fb.com>; [REDACTED]

[REDACTED]@state.gov>

Cc: [REDACTED]@associates.cisa.dhs.gov>; [REDACTED]

[REDACTED]@cisa.dhs.gov>; [REDACTED]

[REDACTED]@hq.dhs.gov>; [REDACTED]

[REDACTED]@state.gov> [REDACTED]@state.gov>; [REDACTED]@fb.com>; [REDACTED]

[REDACTED]@state.gov>

Subject: Re: Speaker details: May 11 Africa CSIRT workshop on disinformation / misinformation

Looking forward to joining you for the African CSIRT workshop tomorrow. I'm following up with aggregated information on the workshop participants who have registered thus far.

- 25 participants (not including observers or speakers) have registered. They represent the governments of Zambia, Cote d'Ivoire, Ghana, Nigeria, Mauritius, Benin, and Kenya as well as the African Union and ECOWAS.
- While there is a wide range of reported duties, on average, participants spend 33% of their time working on disinformation and misinformation.
- Of the 22 people who answered the question, "Which of the following platforms are you concerned about when it comes to spreading disinformation and misinformation?", all 22 people were concerned about dis & misinfo on Facebook. 21 also listed WhatsApp, 15 listed Twitter, 15 listed local websites, 11 listed Instagram, 9 listed YouTube, and 1 listed WeChat.
- On average, participants rate their confidence in their own abilities to handle dis and misinformation at 5 on a 10 point scale.

[REDACTED] please do confirm if you're OK with your presentation being recorded. And if you'd like to do a quick tech check, let me know. I will also plan to have the Webex meeting open about 15 minutes early. (The link again is [here](#).)

Thanks,

[REDACTED]

From: [REDACTED]@state.gov>
Sent: Thursday, May 6, 2021 9:48 AM
To: [REDACTED]@cisa.dhs.gov>; [REDACTED]@fb.com>; [REDACTED]@state.gov>
Cc: [REDACTED]@associates.cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>; [REDACTED]@hq.dhs.gov>; [REDACTED]@state.gov>; [REDACTED]@state.gov>; [REDACTED]@fb.com>; [REDACTED]@state.gov>
Subject: Re: Speaker details: May 11 Africa CSIRT workshop on disinformation / misinformation

Thanks, [REDACTED]! Yes, we'll have screen sharing turned on. If anyone hasn't used Webex for this purpose before and wants to hop on a call to try it out, please let me know. It's not quite as intuitive as Zoom, but it works.

[REDACTED] can you please confirm if you've had a chance to review and if you're OK with recording your presentations?

[REDACTED]

From: [REDACTED]@cisa.dhs.gov>
Sent: Thursday, May 6, 2021 9:40 AM
To: [REDACTED]@state.gov>; [REDACTED]@fb.com>; [REDACTED]@state.gov>
Cc: [REDACTED]@associates.cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>; [REDACTED]@hq.dhs.gov>; [REDACTED]@state.gov>; [REDACTED]@state.gov>; [REDACTED]@fb.com>; [REDACTED]@state.gov>
Subject: RE: Speaker details: May 11 Africa CSIRT workshop on disinformation / misinformation

Thanks so much for this information. [REDACTED] to be recorded. Will each presenter have the ability to screen-share to present slides?

Best,

[REDACTED]

National Risk Management Center
Cybersecurity and Infrastructure Security Agency

[REDACTED]

From: [REDACTED]@state.gov>
Sent: Monday, May 3, 2021 5:36 PM
To: [REDACTED]@fb.com>; [REDACTED]@state.gov>; [REDACTED]@cisa.dhs.gov>
Cc: [REDACTED]@associates.cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>; [REDACTED]@hq.dhs.gov>; [REDACTED]@state.gov>; [REDACTED]@state.gov>; [REDACTED]@fb.com>; [REDACTED]

overall goal with this event, to make sure the information we're sharing is appropriate for CSIRTs that have fewer staff and smaller budgets than US-CERT.

Thanks, and please let us know if you have any questions that weren't addressed above.

[REDACTED] (on behalf of the Office of Cyber Issues)

[REDACTED]

Office of the Coordinator for Cyber Issues
Department of State

[REDACTED]

From: [REDACTED]
Sent: 2/17/2022 2:46:55 PM
To: [REDACTED]@google.com]
CC: [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]
Subject: RE: Connection Request: Dept. of Treasury

Thanks, [REDACTED]. We're going to pass your info to Treasury. They will reach-out directly and provide more information about the nature of this request.

Thanks,
[REDACTED]
National Risk Management Center
Cybersecurity and Infrastructure Security Agency
[REDACTED]



From: [REDACTED]@google.com>
Sent: Thursday, February 17, 2022 2:43 PM
To: [REDACTED]@cisa.dhs.gov>
Subject: Re: Connection Request: Dept. of Treasury

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Hi [REDACTED],

I didn't appreciate there was an urgency. Sorry for the lag. Please pass along my contact information. Depending on what the topic is, I may need to pull in others.

Thank you.

[REDACTED]

On Thu, Feb 17, 2022 at 10:56 AM [REDACTED]@cisa.dhs.gov> wrote:

Hi [REDACTED],

Apologies for the second email, this is somewhat time-sensitive, so thank you for your prompt attention to this request! Let me know if you have any questions.

[REDACTED]

National Risk Management Center
Cybersecurity and Infrastructure Security Agency



From: [REDACTED]
Sent: Thursday, February 17, 2022 9:41 AM
To: [REDACTED] [@google.com](mailto:[REDACTED]@google.com)
Cc: [REDACTED] [@cisa.dhs.gov](mailto:[REDACTED]@cisa.dhs.gov); [REDACTED] [@cisa.dhs.gov](mailto:[REDACTED]@cisa.dhs.gov); [REDACTED] [@cisa.dhs.gov](mailto:[REDACTED]@cisa.dhs.gov)
Subject: Connection Request: Dept. of Treasury

Hi [REDACTED],

I hope this email finds you well. The Department of Treasury has asked our team for appropriate POCs to discuss social media and influence matters. We'd like to make the connection to Google if you're amenable? If there's another POC this should be routed to, please let us know!

Thanks in advance.

All my best,

[REDACTED]
[REDACTED]

National Risk Management Center
Cybersecurity and Infrastructure Security Agency

[REDACTED]



From: [REDACTED]
Sent: 2/17/2022 2:44:52 PM
To: [REDACTED]@fb.com]
CC: [REDACTED]@fb.com]; [REDACTED]@fb.com]; [REDACTED]
 [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]
Subject: RE: Connection Request: Dept. of Treasury

Thank, [REDACTED] We're going to pass your info to Treasury. They will reach-out directly and provide more information about the nature of this request.

Thank you!

[REDACTED]
 [REDACTED]

National Risk Management Center
 Cybersecurity and Infrastructure Security Agency

[REDACTED]



From: [REDACTED]@fb.com>
Sent: Thursday, February 17, 2022 2:43 PM
To: [REDACTED]@cisa.dhs.gov>
Cc: [REDACTED]@fb.com> [REDACTED]@fb.com>
Subject: Re: Connection Request: Dept. of Treasury

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Many thanks, [REDACTED] We would be happy to be connected.

Sent from my iPhone

On Feb 17, 2022, at 1:47 PM, [REDACTED]@cisa.dhs.gov> wrote:

Also looping in [REDACTED], who I accidentally left off my first email.

Note, this is somewhat time-sensitive, so appreciate your attention to this request.

Best,

[REDACTED]
 [REDACTED]

National Risk Management Center

Cybersecurity and Infrastructure Security Agency

[Redacted]



From: [Redacted]
Sent: Thursday, February 17, 2022 9:29 AM
To: [Redacted]@fb.com>; [Redacted]@fb.com>; [Redacted]@fb.com>
Cc: [Redacted]@cisa.dhs.gov>; [Redacted]@cisa.dhs.gov>; [Redacted]@cisa.dhs.gov>
Subject: Connection Request: Dept. of Treasury

Greeting [Redacted]

I hope this email finds you well and thanks again for sending along the CIB report yesterday. The [Redacted] at Treasury would like to be connected to industry partners to discuss potential influence operations on social media. We'd like to make the connection to Meta if you're amenable?

Thanks in advance.

All my best,

[Redacted]

National Risk Management Center
Cybersecurity and Infrastructure Security Agency

[Redacted]



Deliberative Process

From: [REDACTED]@google.com
Sent: Thursday, February 17, 2022 2:43 PM
To: [REDACTED]@cisa.dhs.gov
Subject: Re: Connection Request: Dept. of Treasury

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Hi [REDACTED]

I didn't appreciate there was an urgency. Sorry for the lag. Please pass along my contact information. Depending on what the topic is, I may need to pull in others.

Thank you.

[REDACTED]
On Thu, Feb 17, 2022 at 10:56 AM [REDACTED]@cisa.dhs.gov wrote:

Hi [REDACTED]

Apologies for the second email, this is somewhat time-sensitive, so thank you for your prompt attention to this request! Let me know if you have any questions.

[REDACTED]
National Risk Management Center
Cybersecurity and Infrastructure Security Agency

[Redacted]



From: [Redacted]
Sent: Thursday, February 17, 2022 9:41 AM
To: [Redacted] [@google.com](mailto:[Redacted]@google.com)
Cc: [Redacted] [@cisa.dhs.gov](mailto:[Redacted]@cisa.dhs.gov); [Redacted] [@cisa.dhs.gov](mailto:[Redacted]@cisa.dhs.gov); [Redacted] [@cisa.dhs.gov](mailto:[Redacted]@cisa.dhs.gov)
Subject: Connection Request: Dept. of Treasury

Hi [Redacted],

I hope this email finds you well. The Department of Treasury has asked our team for appropriate POCs to discuss social media and influence matters. We'd like to make the connection to Google if you're amenable? If there's another POC this should be routed to, please let us know!

Thanks in advance.

All my best,

[Redacted]
[Redacted]

National Risk Management Center
Cybersecurity and Infrastructure Security Agency

[Redacted]



From: [REDACTED]
Sent: 3/6/2020 9:57:02 AM
To: [REDACTED]@twitter.com]; [REDACTED]@fb.com]
CC: [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]
Subject: GEC - COVID 19

[REDACTED]

We know you all are seeking additional info and context from the State Dept regarding their recent reports and testimony about social media activity and COVID-19. We are meeting with them next week and will provide an update coming out of that meeting. I just wanted to make sure you knew we are working this issue and I know you are also in touch with them.

[REDACTED]

[REDACTED]

Department of Homeland Security
Cybersecurity & Infrastructure Security Agency (CISA)

[REDACTED]

From: [REDACTED]@fb.com]
Sent: 5/20/2021 12:50:01 PM
To: [REDACTED]
CC: [REDACTED]@fb.com]
Subject: Re: Add a name: RE: CV19 misinfo reporting channel
Attachments: CDC-Onboarding-Deck.pdf; CDC_How-to-report-through-Facebook-Government-Casework-Channel-1.pdf

Trying the PDF again – looks like it didn't attach.

From: [REDACTED]@fb.com>
Date: Thursday, May 20, 2021 at 12:49 PM
To: [REDACTED]
Cc: [REDACTED]@fb.com>
Subject: Re: Add a name: RE: CV19 misinfo reporting channel

Hi [REDACTED]

Attached is a PDF of our onboarding slides should you need to review as well as a how to guid.

In speaking with our technical teams, we think it's best for both Census and CDC to have an email alias / shared inbox that staff have access to for reporting – so that Census can have appropriate access to Covid portal as well.

If you have any questions about that, please do let us know!

From: [REDACTED]
Date: Wednesday, May 19, 2021 at 12:38 PM
To: [REDACTED]@fb.com>
Subject: Add a name: RE: CV19 misinfo reporting channel

Please add [REDACTED] to system access. [REDACTED]@cdc.gov.

From: [REDACTED]@fb.com>
Sent: Wednesday, May 12, 2021 11:21 AM
To: Crawford, Carol Y. [REDACTED]; [REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Sure can.

From: [REDACTED]
Date: Wednesday, May 12, 2021 at 11:19 AM
To: [REDACTED]@fb.com>, [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>
Subject: RE: CV19 misinfo reporting channel

Ok, I'll send the appt and get a zoom. Then you can add on your folks.

From: [REDACTED]@fb.com>
Sent: Wednesday, May 12, 2021 11:06 AM
To: Crawford, Carol Y. [REDACTED]@cdc.gov>; [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Apologies for the bumpy transition with [REDACTED] out – do you all have a zoomgov requirement? And if so, would you hold the calendar invite for this? Or does Census?

From: [REDACTED]@fb.com>
Date: Wednesday, May 12, 2021 at 10:51 AM
To: Crawford, Carol Y. [REDACTED]@cdc.gov>, [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Great! Thank you!

From: [REDACTED]@cdc.gov>
Date: Wednesday, May 12, 2021 at 10:50 AM
To: [REDACTED]@fb.com>, [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>
Subject: RE: CV19 misinfo reporting channel

Sorry, didn't realize you were awaiting a respond to your explanation. That time still works. Thanks!

But re-looking at this list, please only include these people as we've had change over since we started the chain:

- [REDACTED]@cdc.gov
- [REDACTED]@cdc.gov
- [REDACTED]@cdc.gov
- [REDACTED]@census.gov
- [REDACTED]@reingold.com
- [REDACTED]@reingold.com
- [REDACTED]@reingold.com

From: [REDACTED]@fb.com>
Sent: Wednesday, May 12, 2021 10:19 AM
To: Crawford, Carol Y. [REDACTED]@cdc.gov>; [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Bumping this calendar thread

From: [REDACTED]@fb.com>
Date: Monday, May 10, 2021 at 4:51 PM
To: Crawford, Carol Y. [REDACTED]@cdc.gov>, [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

This would be for onboarding your teams to the misinfo casework / reporting channel

From: Crawford, Carol Y. [REDACTED]@cdc.gov>
Date: Monday, May 10, 2021 at 4:04 PM
To: [REDACTED]@fb.com>, [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>
Subject: RE: CV19 misinfo reporting channel

Time is good. I did ask [REDACTED] this embarrassing question. I had it in my head this was for Crowd Tangle. But on Thursday she explained it is for something else. Well, I didn't write it down and I'm honestly not sure what this is for. Sorry!

From: [REDACTED]@fb.com>
Sent: Monday, May 10, 2021 4:01 PM
To: [REDACTED]@fb.com>; Crawford, Carol Y. [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Thanks, [REDACTED].
So nice to meet you, [REDACTED]

Look likes Wednesday the 19th 12-1pm option works best for our folks.
Does that option still work for your side?

From: [REDACTED]@fb.com>
Date: Monday, May 10, 2021 at 3:28 PM
To: Crawford, Carol Y. [REDACTED]@cdc.gov>, [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Hi Carol,

[REDACTED] We are very excited for [REDACTED] new addition!
As such, we didn't want you to be a surprised that [REDACTED] will pick up on the threads where [REDACTED] was leading starting today.

That will include this one with scheduling training for the government case work project.

Best,

From: Carol Crawford [REDACTED]@cdc.gov>
Date: Monday, May 10, 2021 at 12:25 PM
To: [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>
Subject: RE: CV19 misinfo reporting channel

I'm so sorry – I'm out all day May 17 for a [REDACTED] thing, can we pick another one? My fault!

From: [REDACTED]@fb.com>
Sent: Friday, May 7, 2021 11:27 AM
To: Crawford, Carol Y. [REDACTED]
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Hi Carol – Following up from our meeting yesterday. It looks like Monday, May 17th at 12:00pm will work for onboarding meeting. The overlaps with your standing Census meeting you mentioned. We will plan to invite the email addresses below (those being onboarded).

Please let me know if any flags on your end.

Best,
[REDACTED]

From: [REDACTED]@cdc.gov>
Date: Tuesday, April 27, 2021 at 11:21 AM
To: [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>
Subject: RE: CV19 misinfo reporting channel

Ugh, so sorry I missed this. It looks correct but I think so might have access already, but not sure.

From: [REDACTED]@fb.com>
Sent: Tuesday, April 27, 2021 11:05 AM
To: Crawford, Carol Y. [REDACTED]
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Hi Carol – Hope the week is off to a good start. I wanted to bump this and see if you had any edits/additions to the onboarding list below.

Let us know if you have any questions.

Best,
[REDACTED]

From: [REDACTED]@fb.com>
Date: Tuesday, April 13, 2021 at 3:50 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>
Subject: CV19 misinfo reporting channel

Hi [REDACTED] – Hope the week is off to a good start. We’re working to get our COVID-19 misinfo channel up for CDC and Census colleagues. Could you kindly confirm if the below emails are correct for onboarding to the reporting channel and if there are others you’d like to include?

Please let me know if you have any questions.

Thank you!

[REDACTED]

- [REDACTED]@cdc.gov
- [REDACTED]@cdc.gov
- [REDACTED]@cdc.gov
- [REDACTED] ([REDACTED])
- [REDACTED]@cdc.gov
- [REDACTED]@cdc.gov
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

From: [REDACTED]@fb.com]
Sent: 7/20/2021 1:24:46 PM
To: Humphrey, Clarke E. [REDACTED]@who.eop.gov]; [REDACTED]@fb.com]
CC: Flaherty, Rob R. [REDACTED]@who.eop.gov]; [REDACTED]@niaid.nih.gov]
Subject: Re: Deactivating fake Fauci IG?

Yep, on it!

From: Humphrey, Clarke E. EOP/WHO [REDACTED]@who.eop.gov>
Date: Tuesday, July 20, 2021 at 1:24 PM
To: [REDACTED]@fb.com>, [REDACTED]@fb.com>
Cc: Flaherty, Rob R. [REDACTED]@who.eop.gov>, [REDACTED]@niaid.nih.gov>
Subject: Deactivating fake Fauci IG?

Hi there – any way we can get this pulled down? It is not actually one of ours:

<https://www.instagram.com/anthonyfauciofficial/>

Clarke Humphrey
Digital Director, COVID-19 Response Team
The White House
[REDACTED]

From: [REDACTED] fb.com]
Sent: 7/23/2021 11:20:12 PM
To: [REDACTED]@fb.com]; [REDACTED]@hhs.gov]
CC: [REDACTED] fb.com]; [REDACTED] hhs.gov]
Subject: Re: Message from [REDACTED]
Attachments: 7_23 - COVID-19 Insights.pdf

Including this week's updated report here. Look forward to scheduling our next working session. As always please let us know if you have any questions.

From: [REDACTED] fb.com>
Date: Friday, July 23, 2021 at 7:29 PM
To: [REDACTED]@hhs.gov>
Cc: [REDACTED]@fb.com>, [REDACTED] fb.com>, [REDACTED] hhs.gov>
Subject: Message from [REDACTED]

Dear [REDACTED] (if I may),

Thanks again for taking the time to meet earlier today. It was very helpful to take stock after the past week and hear directly from you and your team, and to establish our next steps.

We talked about the speed at which we are all having to iterate as the pandemic progresses. I wanted to make sure you saw the steps we took just this past week to adjust policies on what we are removing with respect to misinformation, as well as steps taken to further address the "disinfo dozen": we removed 17 additional Pages, Groups, and Instagram accounts tied to the disinfo dozen (so a total of 39 Profiles, Pages, Groups, and IG accounts deleted thus far, resulting in every member of the disinfo dozen having had at least one such entity removed). We are also continuing to make 4 other Pages and Profiles, which have not yet met their removal thresholds, more difficult to find on our platform. We also expanded the group of false claims that we remove, to keep up with recent trends of misinformation that we are seeing.

We hear your call for us to do more and, as I said on the call, we're committed to working toward our shared goal of helping America get on top of this pandemic. We will reach out directly to [REDACTED] to schedule the deeper dive on how to best measure Covid related content and how to proceed with respect to the question around data. We'd also like to begin a regular cadence of meetings with your team so that we can continue to update you on our progress. You have identified 4 specific recommendations for improvement and we want to make sure to keep you informed of our work on each.

I want to again stress how critical it is that we establish criteria for measuring what's happening on an industry-wide basis, not least to reflect the way platforms are used interchangeably by users themselves. We believe that we have provided more transparency, both through CrowdTangle (the flaws of which we discussed in some detail) and through our Top 100 report, than others and that any further analysis should include a comprehensive look at what's happening across all platforms--ours and others -- if we are going to make progress in a consistent and sustained manner.

Finally, we will be sending you the latest version of our Top 100 report later today, per our regular schedule. [REDACTED] will do the honors this week as it will likely be completed at our end later today East Coast time. We really do hope that we can discuss our approach to this data set in greater detail during our next

session with [REDACTED] as we genuinely believe it is an effective way of understanding what people are actually seeing on the platform.

Once again, I want to thank you for setting such a constructive tone at the beginning of the call. We too believe that we have a strong shared interest to work together, and that we will strive to do all we can to meet our shared goals.

Best wishes

[REDACTED]

From: [REDACTED]@fb.com]
Sent: 7/10/2021 8:00:40 AM
To: [REDACTED]@hhs.gov]
CC: Slavitt, Andrew M. [REDACTED]@who.eop.gov]; [REDACTED]@fb.com]
Subject: Re: Facebook Covid report
Attachments: 7_8 - COVID-19 Insights.pdf

Dear [REDACTED]

Attached is the latest Covid report covering the most recent two week period for which we have stats etc. I understand from [REDACTED] that my team is meeting with yours next week to delve deeper into our covid misinformation efforts. As always, please don't hesitate to reach out when/if needed.

All best

From: [REDACTED]@fb.com>
Date: Friday, June 25, 2021 at 11:19 PM
To: [REDACTED]@hhs.gov>
Cc: "Slavitt, Andrew M. [REDACTED]@who.eop.gov>, [REDACTED]@fb.com>
Subject: Facebook Covid report

Dear [REDACTED]

Attached is the latest Covid report covering the past two weeks. As always, happy to answer any questions you might have with respect to the report's contents.

Additionally, I want to highlight two vaccine-related efforts that launched this week:

The first is the [WhatsApp chat bot](#) we launched with the CDC. This Spanish-language bot not only surfaces local vaccine appointments, it also links users with free Uber/Lyft rides to their appointments and childcare availability nearby. We're excited by the impact this will have on the LatinX vaccination rate.

Second, I wanted to share that we launched a notification to every Instagram user in the United States encouraging them to visit vaccines.gov. After months of state-specific notifications to IG's +150M users in the US, this is Instagram's first push to vaccines.gov. Based on the demographics of Instagram, we're looking forward to reaching the nation's youth and to having a positive impact on their vaccination rates.

Thanks and please don't hesitate to reach out.

Best

From: [REDACTED] fb.com]
Sent: 6/22/2022 10:56:43 AM
To: Flaherty, Rob R. EOP/WHO [REDACTED] who.eop.gov]; Tim Manning [REDACTED] who.eop.gov]; Salcido, Dori A. EOP/WHO [REDACTED] who.eop.gov]; Cheema, Subhan N. EOP/WHO [REDACTED]@who.eop.gov]
CC: [REDACTED] hhs.gov]; [REDACTED] hhs.gov; [REDACTED] fb.com]
Subject: Policy changes for under 5 vaccines

Rob and Team,

Wanted to ensure you were aware of our policy updates following the early childhood vaccine approvals. As of today, all COVID-19 vaccine related misinformation and harm policies on Facebook and Instagram apply to people 6 months or older (with the exception of the claim that the COVID vaccines have full FDA approval since children have only emergency use authorization).

We expanded these policies in coordination with the CDC and ensured that we also included false claims that might be connected to children, such as the false claim that COVID vaccines cause Multisystem inflammatory syndrome in children (MIS-C).

If you have further questions or would like a briefing, please let me know.

Best,

[REDACTED]

From: [REDACTED]@fb.com]
Sent: 6/13/2022 11:25:24 PM
To: Flaherty, Rob R. EOP/WHO [REDACTED]@who.eop.gov]; Tim Manning [REDACTED]@who.eop.gov]; Salcido, Dori A. EOP/WHO [REDACTED]@who.eop.gov]; Cheema, Subhan N. EOP/WHO [REDACTED]@who.eop.gov]
CC: [REDACTED]@hhs.gov]; [REDACTED]@hhs.gov
Subject: Re: Covid Insights report

Thanks Rob—appreciate the feedback. Will circle up with the team and get you an update, and will keep the reports going as long as they're providing value.

Get [Outlook for iOS](#)

From: Flaherty, Rob R. EOP/WHO [REDACTED]@who.eop.gov>
Sent: Monday, June 13, 2022 6:11:16 PM
To: [REDACTED]@fb.com>; Manning, Tim W. EOP/WHO [REDACTED]@who.eop.gov>; Salcido, Dori A. EOP/WHO [REDACTED]@who.eop.gov>; Cheema, Subhan N. EOP/WHO [REDACTED]@who.eop.gov>
Cc: Waldo, Eric (HHS/OASH) [REDACTED]@hhs.gov>; [REDACTED]@hhs.gov [REDACTED]@hhs.gov>
Subject: RE: Covid Insights report

Hey [REDACTED] – Thanks for these. I would normally say we are good to discontinue but it would be helpful to continue to get these as we start to ramp up under 5 vaccines. Obviously, that has a potential to be just as charged. Would love to get a sense of what you all are planning here. I'm also adding in Dori and Subhan who have replaced Courtney and Ben.

From: [REDACTED]@fb.com>
Sent: Monday, June 13, 2022 3:27 PM
To: Rowe, Courtney M. EOP/WHO [REDACTED]@who.eop.gov>; Wakana, Benjamin L. EOP/WHO [REDACTED]@who.eop.gov>; Manning, Tim W. EOP/WHO [REDACTED]@who.eop.gov>
Cc: Flaherty, Rob R. EOP/WHO [REDACTED]@who.eop.gov>; [REDACTED]@hhs.gov>; [REDACTED]@hhs.gov
Subject: [EXTERNAL] Re: Covid Insights report

Hi all,

Attaching recent reports for your review. We will plan to discontinue these unless we hear from you that this information continues to be valuable. We're happy to continue, or to pick up at a later date, if circumstances warrant or if we hear from you that this continues to be of value. Providing a summary below from our team detailing the decrease in vaccine related posts we have seen over the past 6 months for further context.

Thanks and please let me know if you have any questions.

Over the last 6 months, there has been a noticeable decrease in top vaccine-related posts that were demoted as misinformation or for sharing misleading or sensationalized information about vaccines in a way that would be likely to discourage vaccinations. There has not been a post misinforming or discouraging vaccination in this way in the top 100 vaccine-related posts since the week of February 27th, 2022, and the overall trend peak dates back to October of 2021. The total number of posts removed for violating our COVID-19 or vaccine misinformation policies has remained at 1 since the

week of December 13th, 2021. We believe this trend will continue given the sustained low volumes of top-vaccine related posts despite the Omicron variant surge experienced in early 2022.

We recommend discontinuing this report as we are no longer seeing problematic vaccine related posts (Borderline Vaccine) in the top 100 posts viewed on FB in the US. Deprecation of this report will not impact existing enforcement measures or ongoing monitoring and reporting on the problem. Meta will continue to reduce the prevalence of this problem, and will reinstate the reports if events warrant.

From: [REDACTED]@fb.com>

Date: Tuesday, May 3, 2022 at 3:51 PM

To: Rowe, Courtney M. EOP/WHO [REDACTED]@who.eop.gov, [REDACTED]@who.eop.gov
[REDACTED]@who.eop.gov, Manning, Tim W. EOP/WHO [REDACTED]@who.eop.gov

Cc: Flaherty, Rob R. EOP/WHO [REDACTED]@who.eop.gov, [REDACTED]@hhs.gov, [REDACTED]@hhs.gov, [REDACTED]@hhs.gov

Subject: Covid Insights report

Attaching the past two reports for your review. These cover the periods from 3/20 through 4/16. Also flagging that it would help to hear from you if these reports continue to provide useful context or if you'd like to follow up with a discussion as to how we can be helpful during this phase of the pandemic. We filed a response to the Surgeon General's rfi on Covid misinformation and would be happy to discuss at the appropriate time.

Thanks,

From: [REDACTED]@fb.com>

Date: Monday, April 4, 2022 at 2:48 PM

To: Rowe, Courtney M. EOP/WHO [REDACTED]@who.eop.gov, [REDACTED]@who.eop.gov
[REDACTED]@who.eop.gov, Manning, Tim W. EOP/WHO [REDACTED]@who.eop.gov

Cc: Flaherty, Rob R. EOP/WHO [REDACTED]@who.eop.gov, [REDACTED]@hhs.gov, [REDACTED]@hhs.gov, [REDACTED]@hhs.gov

Subject: Re: Covid Insights report -

Attached is the most recent Insights report. Toplines are below as well.

Given the shifting dynamics of the pandemic, it would help to understand if these reports are still useful or if we should rethink the cadence of our sending this information. Any objections to scaling back to a monthly report? If folks find the biweekly cadence useful we are happy to keep it up, just want to be responsive to your interests.

Thanks—and please let me know if you have any other feedback that we should consider.

Below is what we are seeing in the top 100 most viewed overall posts on Facebook in the US, as well as the top vaccine related posts on Facebook in the US for the weeks of 03/06/22 - 03/12/22 and 03/13/22 - 03/19/22.

As before, this report is focused on top vaccine related posts only. We're continuing to investigate and build analysis around content that isn't captured in this report. Again, the analysis provided below may be subject to other methodological challenges or errors - e.g., the specific rank number may not be exact.

1. Top 100 overall posts on FB in the U.S.

When looking at the overall top 100 posts viewed on Facebook in the United States during the week of 03/06/22 - 03/12/22, we see 0 pieces of content were specifically related to vaccine content.

When looking at the overall top 100 posts viewed on Facebook in the United States during the week of 03/13/22 - 03/19/22, we see that 0 pieces of content were specifically related to vaccine content.

Top 100 vaccine-related posts on FB in the U.S.

Of the Top 100 vaccine-related posts viewed on Facebook in the United States during the week of 03/06/22 - 03/12/22:

- 1. 0 posts were deleted for violating our COVID-19 and vaccine policies.
- 2. 0 posts were labeled by third-party fact-checkers for "missing context".
- 3. 0 posts were labeled and demoted upon review.

Of the Top 100 vaccine-related posts viewed on Facebook in the United States during the week of 03/13/22 - 03/19/22:

- 1. 0 posts were deleted for violating our COVID-19 and vaccine policies
- 2. 0 posts were labeled and demoted by third-party fact checkers
- 3. 1 post was labeled and demoted for sensationalist content about the number of vaccine doses that will be recommended in future.

From: [REDACTED]@fb.com>
Date: Monday, March 28, 2022 at 2:26 PM
To: Rowe, Courtney M. EOP/WHO [REDACTED]@who.eop.gov> [REDACTED]@who.eop.gov
 [REDACTED]@who.eop.gov>, Manning, Tim W. EOP/WHO [REDACTED]@who.eop.gov>
Cc: Flaherty, Rob R. EOP/WHO [REDACTED]@who.eop.gov>, [REDACTED]
 [REDACTED]@hhs.gov>, [REDACTED]@hhs.gov [REDACTED]@hhs.gov>
Subject: Re: Covid Insights report -

Sending the latest version of our insights report. Please let me know if you have any questions.

[REDACTED] |  Meta
US Public Policy



From: [REDACTED]@fb.com>
Date: Wednesday, February 23, 2022 at 3:32 PM
To: Rowe, Courtney M. EOP/WHO [REDACTED]@who.eop.gov> [REDACTED]@who.eop.gov
 [REDACTED]@who.eop.gov>, Manning, Tim W. EOP/WHO [REDACTED]@who.eop.gov>
Cc: Flaherty, Rob R. EOP/WHO [REDACTED]@who.eop.gov>, [REDACTED]
 [REDACTED]@hhs.gov> [REDACTED]@hhs.gov>
Subject: Covid Insights report -

Sending the latest Covid Insights Report—please let us know if you have any questions.

Thanks and have a good week.

[REDACTED] |  Meta

US Public Policy



From: [REDACTED]@fb.com]
Sent: 2/10/2022 9:18:18 PM
To: Rowe, Courtney (who.eop.gov) [REDACTED]@who.eop.gov]; Wakana, Benjamin (who.eop.gov) [REDACTED]@who.eop.gov]; Tim Manning [REDACTED]@who.eop.gov]
CC: Flaherty, Rob R. EOP/WHO [REDACTED]@who.eop.gov]; [REDACTED]@hhs.gov]; [REDACTED]@hhs.gov]
Subject: Re: Covid Insights report -
Attachments: 2_4_22 - COVID-19 Insights.pdf

Apologies for sending this report late—entirely my fault for not getting this to you earlier. Attached is the Insights report for the periods dating between 1/09–1/22. The next report will be sent on Friday, 2/18.

Thanks and as always please let me know if you have questions.

[REDACTED] |  Meta
 US Public Policy

From: [REDACTED]@fb.com>
Date: Monday, January 24, 2022 at 1:28 PM
To: Rowe, Courtney M. EOP/WHO [REDACTED]@who.eop.gov>, [REDACTED]@who.eop.gov <[REDACTED]@who.eop.gov>, Manning, Tim W. EOP/WHO <[REDACTED]@who.eop.gov>
Cc: Flaherty, Rob R. EOP/WHO <[REDACTED]@who.eop.gov>, [REDACTED]@hhs.gov>, [REDACTED]@hhs.gov <[REDACTED]@hhs.gov>
Subject: Re: Covid Insights report -

Attached is the latest Covid Insights Report, which details the top 100 posts overall as well as the top 100 vaccine related posts over the periods of 12/26 – 1/8.

Overall, of the Top 100 vaccine-related posts viewed on Facebook in the United States during the week of 12/26/21 - 01/01/22:

- 0 posts were deleted for violating our COVID-19 and vaccine policies.
- 0 posts were labeled and demoted by third-party fact checkers.
- 0 posts were labeled and demoted upon review.

Of the Top 100 vaccine-related posts viewed on Facebook in the United States during the week of 01/02/22 - 01/08/22:

- 0 posts were deleted for violating our COVID-19 and vaccine policies
- 0 posts were labeled and demoted by third-party fact checkers
- 5 posts were labeled and demoted upon review
 - Two were videos by public figures suggesting that vaccines are ineffective
 - Two were vaccine humor posts whose content could discourage vaccination
 - One was a post by a public figure promoting the Omicron variant as a natural alternative to the COVID-19 vaccine

Thanks and as always please let me know if you have any questions.

[Redacted] | Meta
US Public Policy

From: [Redacted]@fb.com>
Date: Saturday, January 8, 2022 at 5:34 PM
To: Rowe, Courtney M. EOP/WHO <[Redacted]@who.eop.gov>, [Redacted]@who.eop.gov <[Redacted]@who.eop.gov>, Manning, Tim W. EOP/WHO <[Redacted]@who.eop.gov>
Cc: Flaherty, Rob R. EOP/WHO <[Redacted]@who.eop.gov>, [Redacted] (HHS/OASH) <[Redacted]@hhs.gov>, [Redacted]@hhs.gov <[Redacted]@hhs.gov>, [Redacted]@fb.com>
Subject: Covid Insights report -

Attached is the latest version of our Covid Insights report, covering weeks of 12/12-12/25.

Of the Top 100 vaccine-related posts viewed on Facebook in the United States during the week of 12/12/21 - 12/18/21:

- 0 posts were deleted for violating our COVID-19 and vaccine policies.
- 0 posts were labeled and demoted by third-party fact checkers for "false information".
- 0 posts were labeled and demoted upon review.

Of the Top 100 vaccine-related posts viewed on Facebook in the United States during the week of 12/19/21 - 12/25/21:

- 0 posts was deleted for violating our COVID-19 and vaccine policies
- 0 posts were labeled and demoted by third-party fact checkers
- 2 posts were labeled and demoted upon review. Both were suggesting natural immunity by COVID-19 infection is superior to immunity by the COVID-19 vaccine.

Please let us know if you'd like to discuss. Thanks and enjoy the rest of the weekend.

[Redacted] | Meta
US Public Policy

From: [Redacted]@fb.com>
Date: Friday, January 7, 2022 at 10:57 AM
To: Rowe, Courtney M. EOP/WHO <[Redacted]@who.eop.gov>, [Redacted]@who.eop.gov <[Redacted]@who.eop.gov>, Manning, Tim W. EOP/WHO <[Redacted]@who.eop.gov>
Cc: Flaherty, Rob R. EOP/WHO <[Redacted]@who.eop.gov>, [Redacted] (HHS/OASH) <[Redacted]@hhs.gov>, [Redacted]@hhs.gov <[Redacted]@hhs.gov>, [Redacted]@fb.com>
Subject: Re: [EXTERNAL] Re: Covid Insights Report - weeks of 10/31-11/13

Morning,

We'll send our latest updated Covid Insights top 100 report later today. I also wanted to send a quick update on the work we are doing to combat the Omicron wave. Happy to discuss any of these measures or anything else that might be on your minds. Ben—I'm running down your questions from yesterday and hope to have a response back later today as well.

Our approach continues to evolve on both vaccinations and the Omicron variant and booster vaccines:

- **Partner Campaigns:** We recently launched several campaigns with partners to bring authoritative information to users. This includes a campaign with Johns Hopkins University's Bloomberg School of Public Health and Ad Council, which is aimed at parents and encourages children's vaccines. We also launched a campaign encouraging eligible adults to get booster shots with the Bloomberg School of Public Health. Finally, we kicked off a flu vaccination campaign with the Mayo Clinic and Johns Hopkins University's Bloomberg School of Public Health.
- **Profile Frames:** In early December, we partnered with HHS to launch a new set of Facebook Profile Frames in both English and Spanish that encourage the COVID-19 booster vaccine. We have been promoting the adoption of these profile frames since mid-December, and continue to do so.
- **In Feed Promotions** - We are running promotions on Facebook in both English and Spanish highlighting content created by credible health and media organizations that share authoritative information about both Omicron and booster vaccine eligibility.
- **Ads:** We continue to work with HHS and CDC on utilizing what remains of the combined \$30 million allocated in ad credits to raise awareness of the booster vaccine and communicate essential health information. Though HHS was unable to accept additional ad coupons, we are supporting national nonprofit organizations dedicated to communicating critical vaccine information.

 Meta
US Public Policy

From: [REDACTED]@fb.com>

Date: Wednesday, December 15, 2021 at 1:07 PM

To: Rowe, Courtney M. EOP/WHO <[REDACTED]@who.eop.gov>

Cc: Flaherty, Rob R. EOP/WHO <[REDACTED]@who.eop.gov>, [REDACTED]
<[REDACTED]@hhs.gov>, [REDACTED]@hhs.gov <[REDACTED]@hhs.gov>, [REDACTED]

[REDACTED]@fb.com>

Subject: Re: [EXTERNAL] Re: Covid Insights Report - weeks of 10/31-11/13

Hi Courtney—

Apologies for the delayed response. I want to make sure we aren't miscommunicating—and if you are thinking of a separate campaign other than the one we are currently deploying, I will run that to ground. We're taking a multi-prong approach to addressing the Omicron variant and encouraging people to get their booster vaccines, including:

- **Profile Frames:** On Wednesday, December 1, we partnered with HHS to launch a new set of Facebook Profile Frames that encourage the COVID-19 booster vaccine. The frames are in both English and Spanish, and allow users to share either that they've received their booster vaccine ("I Got My COVID-19 Booster") or to encourage getting the

booster (“Let’s Get Our Covid-19 Booster”). We have employed platform interventions to promote adoption of these frames and will continue to iterate.

- **In Feed Promotions** - We ran in feed promotions on Facebook in both English and Spanish, which share content created by credible health and media organizations about the Center for Disease Control recommendation for all eligible adults to get their booster vaccine.
- **Ads:** In partnership with HHS and Center for Disease Control, we are working to utilize their remaining ad credits to raise awareness of the booster vaccine and communicate essential health information.
- **Partner campaigns:** Next week, we are launching a campaign with Johns Hopkins University’s Bloomberg School of Public Health that will encourage eligible adults to get booster shots. Additionally, our partnerships teams continue to encourage public figures and influencers to adopt the HHS Profile Frames, and we continue to explore ways of working together to activate these influencers in support of HHS/CDC recommendations.
- **Covid Information Center:** We worked with the Center for Disease Control to update language in the Covid Information Center’s Frequently Asked Question section, ensuring it accurately mirrors current CDC/FDA recommendations regarding the new variant and the booster.

If there are efforts that you think could be helpful in addition to what we are doing above, I’d appreciate hearing from you and the team and I’ll follow up with our teams to make sure we are doing what we can.

 Meta
US Public Policy

From: Rowe, Courtney M. EOP/WHO <[REDACTED]@who.eop.gov>

Date: Monday, December 13, 2021 at 10:58 AM

To: [REDACTED]@fb.com>

Cc: Flaherty, Rob R. EOP/WHO <[REDACTED]@who.eop.gov>, [REDACTED]
[REDACTED]@hhs.gov>, [REDACTED]@hhs.gov <[REDACTED]@hhs.gov> [REDACTED]
[REDACTED]@com>

Subject: Re: [EXTERNAL] Re: Covid Insights Report - weeks of 10/31-11/13

Thanks [REDACTED] How long before you think you’ll get the booster campaign off the ground? I saw coming weeks, but just wondering if you have a more firm timeline. I think pushing boosters is going to increasingly become more important given omicron

Sent from my iPhone

On Dec 13, 2021, at 10:40 AM, [REDACTED]@fb.com> wrote:

Morning—including the latest Covid Insights report here for your review. As always please let us know if you have any questions or would like to discuss anything related to our work.

From: [REDACTED]@fb.com>
Date: Wednesday, December 1, 2021 at 1:50 PM
To: [REDACTED]@who.eop.gov <[REDACTED]@who.eop.gov>, [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>, Rowe, Courtney M. EOP/WHO <[REDACTED]@who.eop.gov>, [REDACTED]@hhs.gov <[REDACTED]@hhs.gov>
Cc: [REDACTED]@fb.com>
Subject: Covid Insights Report - weeks of 10/31-11/13

Rob [REDACTED] Courtney, [REDACTED] –

Apologies for delay over the holiday weekend— sending our most recent Covid Insights report for weeks of 10/31-11/13.

We also wanted to provide you with a brief update on our work both on vaccines for children age 5-11, as well as our work on boosters.

Youth/Week of Action

- On the platform, we launched in-feed promotions featuring content in English and Spanish from authoritative health orgs and media about vaccine approval and safety for children ages 5-11. We are currently re-running this campaign. We also updated our COVID Information Center FAQ unit with the latest vaccine information regarding children ages 5-11.
- We are supporting Kaiser Family Foundation, Ad Council, and Direct Relief to run large-scale ad campaigns aimed at parents that answer questions about COVID-19 vaccines for children, some of which are available both in English and Spanish. We have encouraging results back from one of these campaigns indicating that it has helped increase perceptions that COVID-19 vaccines are safe and important for children.

Boosters

- In the coming weeks, we are launching a campaign with Johns Hopkins University's Bloomberg School of Public Health that will encourage eligible adults to get booster shots, particularly ahead of the holiday season.
- We're working with HHS on a new set of profile frames specifically encouraging people to get their booster vaccine. The new frames, which are available in both English and Spanish, will let you share your support for COVID-19 booster vaccines, and see that others you respect and care about are doing the same.

Separately, our teams are reviewing our strategy in light of the emerging Omicron variant of the virus. As additional guidance emerges from our authoritative health partners, we'll ensure that information is shared in surfaces like the COVID Information Center, as we've done recently with updating guidance on booster eligibility this week.

As always, please let me know if you have any questions. We'd be happy to schedule time to cover any of the content here.

[REDACTED]
US Public Policy

[REDACTED]
<12_10_21 - COVID-19 Insights [WIP].pdf>

From: [REDACTED] fb.com]
Sent: 11/15/2021 12:16:27 AM
To: [REDACTED] who.eop.gov; [REDACTED] (HHS/OASH) ([REDACTED] hhs.gov); Rowe, Courtney (who.eop.gov)
 [REDACTED] who.eop.gov); [REDACTED] (HHS/ASPA) [REDACTED] hhs.gov]
CC: [REDACTED] fb.com]
Subject: Covid Insights Report - weeks of 10/17-10/30
Attachments: 11_12 - COVID-19 Insights.pdf

Apologies for the late Sunday email—wanted to make sure to get you our latest Covid Insights Report for the weeks of 10/17-10/30. As always, please don't hesitate to reach out with any questions about the content included here or our ongoing efforts to provide information on the 5-11 vaccine.

[REDACTED] |  Meta
 US Public Policy

From: [REDACTED] fb.com>
Date: Thursday, November 4, 2021 at 12:09 AM
To: [REDACTED] who.eop.gov <[REDACTED] who.eop.gov>, [REDACTED]
 [REDACTED] hhs.gov>, Rowe, Courtney M. EOP/WHO <[REDACTED] who.eop.gov>,
 [REDACTED] hhs.gov <[REDACTED] hhs.gov>
Cc: [REDACTED] fb.com>
Subject: Re: Covid Insights and plan for approval of kids vaccine

Rob, [REDACTED] Courtney, [REDACTED] —


We wanted to follow up and share what steps we've taken over the last several days as FDA and CDC approvals have now been granted:


- Last Friday, we updated our misinformation policies for COVID-19 vaccines to make clear they apply to claims about children -- for example, claims that the COVID vaccine gives children Bell's Palsy, causes blood clots in children, and causes multiple sclerosis in children. We're grateful to our partners at the CDC for helping get these debunked in advance of the announcement, and we look forward to staying connected on emerging COVID misinformation trends.
- This morning, we launched in-feed promotions featuring content in English and Spanish from authoritative health orgs and media about vaccine approval and safety for children ages 5-11. We have included images of example promotions below. We plan to continue promoting this content through the Week of Action.


Additionally, we are in the process of updating content in the COVID Information Center with the latest vaccine information regarding children ages 5-11. We also published a News Room Post detailing how we're supporting the roll out of children's vaccines [here](#). As a reminder, we plan to go bigger and louder over the Week of Action, as detailed in our previous email. Please let us know if you have any questions.

Thanks,



 The linked image cannot be displayed. The file may have been moved, renamed, or deleted. Verify that the link points to the correct file and location.

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 The linked image cannot be displayed. The file may have been moved, renamed, or deleted. Verify that the link points to the correct file and location.

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From: [Redacted]@fb.com>
Sent: Friday, October 29, 2021 5:12 PM
To: [Redacted]@who.eop.gov; [Redacted] (HHS/OASH); Rowe, Courtney M. EOP/WHO; [Redacted]@hhs.gov

Cc: [REDACTED]

Subject: Covid Insights and plan for approval of kids vaccine

Rob, Courtney, [REDACTED]

Thanks again for taking the time to meet with us on Monday, and for sharing the administration's plans for the November 15th Week of Action. We are committed to the effort of amplifying the rollout of children's COVID vaccines. Below is a detailed description of our plans:

Once FDA Approval Goes into Effect (Date TBD)

- Launch in-feed promotions featuring content from authoritative health orgs and media about vaccine approval for children ages 5-11 to spread awareness. This will run in English and Spanish, and will continue through the Week of Action.
- As soon as the CDC updates its guidance, we will update our COVID Information Center Vaccine FAQ section with vaccine safety information for children ages 5-11.
- As discussed, as soon as the EUA is issued, we will also be able to apply claims from our current misinfo policies for COVID-19 vaccines to include claims about child vaccinations. We were able to make this change based on the conversation we had last week with the CDC, expected language from the EUA, and previous conversations with health authorities. There are several claims that we will be able to remove as soon as the CDC debunks them; until then, we are unable to remove them (e.g., COVID vaccine gives children Bell's Palsy, causes blood clots in children, and causes multiple sclerosis in children).

Week of Action (Nov 15-21)

- Amplify the updated content in our COVID Information Center Vaccine FAQ section about vaccine safety information for children ages 5-11 through in-feed promotions.
- Promote in-feed that vaccines are now available for children ages 5-11, with a link to help identify the nearest location to get the vaccine.
- Starting in mid-November and continuing through early December, we'll be supporting a number of partners including Kaiser Family Foundation, Ad Council, and Direct Relief to launch large-scale ad campaigns aimed at parents that will answer questions about COVID-19 vaccines for children. Some of these campaigns, like Kaiser Family Foundation's, will be available both in English and Spanish.

As a reminder, we continue to invest in our partnership with HHS to launch an influence r campaign, and are exploring options for how the campaign might serve parents of children ages 5-11. We are also continuing our work with state and local health authorities to ensure that existing tools can be leveraged to support the children's vaccine rollout, including updating the Vaccine Finder and sending users to vaccines.gov.

As discussed on our call, we have observed peaks and troughs of new COVID misinformation over the last 18 months, often coinciding with key external developments. We expect the approval of COVID vaccines for kids ages 5-11 will be another significant peak in new misinformation claims. Our policy allows us to take action against this content once those claims have been debunked and confirmed harmful by a public health authority. We're committed to addressing these quickly; to do so effectively, we will need a channel to a health expert with whom we can discuss these claims in real time. Is this something we could partner on, and if so, would your team be able to help connect us with a point person?

Lastly, please see the biweekly report PDF enclosed.

We appreciate the opportunity to partner and welcome your feedback on any of the above.

Thanks,

[REDACTED] and team

From: [REDACTED]@fb.com]
Sent: 10/31/2021 4:43:30 PM
To: [REDACTED] (HHS/OASH) [REDACTED]@hhs.gov]
Subject: fwd: not even sure what to say at this point

Flag: Followup

[REDACTED]—we had heard from Rob Thursday as well regarding Thursday's wapo story (my response below). I saw the Surgeon General's reaction on Twitter—we want to make sure you and he have the context necessary as we feel strongly that the claims made in the story are not accurate, especially considering that we had discussed many of the studies referenced during our briefings.

Please let me know if you'd have time for a longer conversation next week.

Thanks,

[REDACTED]

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From: [REDACTED]@fb.com>
Sent: Thursday, October 28, 2021 11:58 AM
To: Flaherty, Rob R. EOP/WHO
Subject: Re: not even sure what to say at this point

Hey—nothing in the story is inconsistent with what we briefed on. The studies referenced in the story were all done early and were not in any way considered to be methodologically appropriate for sharing. We referenced these in briefings and also talked about why we were not comfortable using this type of data because it's unreliable. This has been a fundamental disagreement to be sure in terms of data you have asked for and data that we have said is best used to depict the scope of the issue. But we've been open about that. A number of these studies cited in the story were specifically referenced during our briefings. Happy to get on the phone to walk through why this story is not accurate—like much of the coverage in recent days it relies on cherry picked data that portrays a specific narrative. In the meantime, here's the statement we just released:

“The studies cited were in no way definitive, which is why we did not share them as if they were. They were early directional analyses meant to give guidance to product and policy teams on where we could improve our defenses against harmful vaccine misinformation. We improved our policies based in part on those analyses and communicated those steps to policymakers and the public. As VP of Integrity [REDACTED] noted in August, measuring prevalence of a specific type of content on our platform takes years of work - especially on a topic as dynamic as vaccine misinformation - which is why no company has to date been able to share that data.”

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From: Flaherty, Rob R. EOP/WHO <[REDACTED]@who.eop.gov>
Sent: Thursday, October 28, 2021 10:09:04 AM
To: [REDACTED]@fb.com>
Subject: not even sure what to say at this point

<https://www.washingtonpost.com/technology/2021/10/28/facebook-covid-misinformation/>

Rob Flaherty
Director of Digital Strategy
The White House



From: [REDACTED]@fb.com]
Sent: 10/29/2021 5:12:35 PM
To: [REDACTED]@who.eop.gov; [REDACTED] (HHS/OASH) [REDACTED]@hhs.gov; Rowe, Courtney (who.eop.gov) [REDACTED]@who.eop.gov; [REDACTED] (HHS/ASPA) [REDACTED]@hhs.gov]
CC: [REDACTED]@fb.com]
Subject: Covid Insights and plan for approval of kids vaccine
Attachments: 10_29 - COVID-19 Insights.pdf

Rob, Courtney, [REDACTED]

Thanks again for taking the time to meet with us on Monday, and for sharing the administration's plans for the November 15th Week of Action. We are committed to the effort of amplifying the rollout of children's COVID vaccines. Below is a detailed description of our plans:

Once FDA Approval Goes into Effect (Date TBD)

- Launch in-feed promotions featuring content from authoritative health orgs and media about vaccine approval for children ages 5-11 to spread awareness. This will run in English and Spanish, and will continue through the Week of Action.
- As soon as the CDC updates its guidance, we will update our COVID Information Center Vaccine FAQ section with vaccine safety information for children ages 5-11.
- As discussed, as soon as the EUA is issued, we will also be able to apply claims from our current misinfo policies for COVID-19 vaccines to include claims about child vaccinations. We were able to make this change based on the conversation we had last week with the CDC, expected language from the EUA, and previous conversations with health authorities. There are several claims that we will be able to remove as soon as the CDC debunks them; until then, we are unable to remove them (e.g., COVID vaccine gives children Bell's Palsy, causes blood clots in children, and causes multiple sclerosis in children).

Week of Action (Nov 15-21)

- Amplify the updated content in our COVID Information Center Vaccine FAQ section about vaccine safety information for children ages 5-11 through in-feed promotions.
- Promote in-feed that vaccines are now available for children ages 5-11, with a link to help identify the nearest location to get the vaccine.
- Starting in mid-November and continuing through early December, we'll be supporting a number of partners including Kaiser Family Foundation, Ad Council, and Direct Relief to launch large-scale ad campaigns aimed at parents that will answer questions about COVID-19 vaccines for children. Some of these campaigns, like Kaiser Family Foundation's, will be available both in English and Spanish.


As a reminder, we continue to invest in our partnership with HHS to launch an influencer campaign, and are exploring options for how the campaign might serve parents of children ages 5-11. We are also continuing our work with state and local health authorities to ensure that existing tools can be leveraged to support the children's vaccine rollout, including updating the Vaccine Finder and sending users to vaccines.gov.

As discussed on our call, we have observed peaks and troughs of new COVID misinformation over the last 18 months, often coinciding with key external developments. We expect the approval of COVID vaccines for kids ages 5-11 will be another significant peak in new misinformation claims. Our policy allows us to take action against this content once those claims have been debunked and confirmed harmful by a public health authority. We're committed to addressing these quickly; to do so effectively, we will need a channel to a health expert with whom we can discuss these claims in real time. Is this something we could partner on, and if so, would your team be able to help connect us with a point person?

Lastly, please see the biweekly report PDF enclosed.

We appreciate the opportunity to partner and welcome your feedback on any of the above.

Thanks,

 and team

From: [REDACTED] fb.com]
Sent: 10/20/2021 8:55:39 AM
To: Flaherty, Rob R. EOP/WHO ([REDACTED] who.eop.gov]
CC: Clarke.Humphrey ([REDACTED] who.eop.gov); Tom, Christian L EOP/WHO ([REDACTED] who.eop.gov];
 [REDACTED] HHS/OASH) ([REDACTED] hhs.gov); Rowe, Courtney (who.eop.gov) ([REDACTED] who.eop.gov];
 [REDACTED] (HHS/IOS) ([REDACTED] hhs.gov); Qureshi, Hoor A. EOP/WHO ([REDACTED] who.eop.gov];
 [REDACTED] fb.com]
Subject: Re: Kids vaccines

Thanks Rob—we'd welcome the opportunity. Adding [REDACTED] on our end to help coordinate.

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From: Flaherty, Rob R. EOP/WHO <[REDACTED]@who.eop.gov>
Sent: Tuesday, October 19, 2021 12:30:07 PM
To: [REDACTED] fb.com>
Cc: Humphrey, Clarke E. EOP/WHO ([REDACTED] who.eop.gov); Tom, Christian L. EOP/WHO ([REDACTED] who.eop.gov); [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>; Rowe, Courtney M. EOP/WHO ([REDACTED] who.eop.gov); [REDACTED] (HHS/IOS) <[REDACTED]@hhs.gov>; Qureshi, Hoor A. EOP/WHO <[REDACTED]@who.eop.gov>
Subject: Kids Vaccines

[REDACTED]—Related to your previous email, thought it might be helpful for us to connect on what the admin's plans are for the 5-11 vaccine roll out. We'd like to talk about what we're seeing as the biggest headwinds we're going to face, and discuss what you all are planning as we move into this next phase. We remain concerned about mis- and disinformation on feed and in groups, and the wide reach of hesitancy-inducing content across your platform. With that said, we hope - as ever -- that this will be a productive and forward-looking conversation.

Hoor can help wrangle times on our end, if you've got some times on yours this week or early next.

-Rob

Rob Flaherty
 Director of Digital Strategy
 The White House
 [REDACTED]

From: [REDACTED] fb.com]
Sent: 9/21/2021 2:15:04 PM
To: Flaherty, Rob R. EOP/WHO [REDACTED] who.eop.gov]
CC: [REDACTED] (HHS/OASH) [REDACTED] hhs.gov]; Rowe, Courtney (who.eop.gov) [REDACTED] who.eop.gov]; DJ Patil [REDACTED] gmail.com]
Subject: Re: [EXTERNAL] Covid Insight Report

Understood Rob—we will circle back over the next few days to brief.

From: Flaherty, Rob R. EOP/WHO <[REDACTED] who.eop.gov>
Date: Saturday, September 18, 2021 at 2:54 PM
To: [REDACTED] fb.com>
Cc: [REDACTED] (HHS/OASH) <[REDACTED] hhs.gov>, Rowe, Courtney M. EOP/WHO [REDACTED] who.eop.gov>, DJ Patil [REDACTED] gmail.com>
Subject: Re: [EXTERNAL] Covid Insight Report

Happy to talk about it, [REDACTED] Would be interested to see, as we have long asked for, how big the problem is, what solutions you're implementing, and how effective they've been.

Sent from my iPhone

On Sep 18, 2021, at 2:52 PM, [REDACTED] fb.com> wrote:

[REDACTED] and team,

Including the latest version of our report here.

I'm sure you also saw yesterday's story in the WSJ about the spread of COVID-19 misinformation in comments on Facebook. The story - largely based on cherry-picked leaked documents, doesn't accurately represent the problem or the solutions we have put in place to make comments on posts about COVID and vaccines safer. I know that we've discussed this many times over the past several months and I'd be happy to schedule a call to discuss in greater detail. Please let me know if that would be of interest.

In the meantime I'm also sharing a post we published today from [REDACTED] addressing the WSJ series in full. Link to that post is [here](#).

As always please let me know if you have any questions.

Thanks,

From: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>
Date: Tuesday, September 7, 2021 at 5:11 PM
To: [REDACTED] fb.com>, [REDACTED] who.eop.gov <[REDACTED] who.eop.gov>, Rowe,

Courtney (who.eop.gov) <[REDACTED]@who.eop.gov>, DJ Patil ([REDACTED]@gmail.com)

Subject: RE: Covid Insight Report

Thanks so much for sharing this, [REDACTED] DJ and I connected last week and he should be reaching out with timing soon (me or someone from my team would join him as well).

Thanks!

From: [REDACTED]@fb.com>

Sent: Tuesday, September 7, 2021 10:03 AM

To: [REDACTED] (HHS/OASH) [REDACTED]@hhs.gov>; [REDACTED]@who.eop.gov; Rowe, Courtney (who.eop.gov) [REDACTED]@who.eop.gov; DJ Patil ([REDACTED]@gmail.com)

Subject: Covid Insight Report

Good morning—apologies that this is coming after the holiday weekend. Attaching our latest Covid Insights report. Happy to schedule time to discuss at your convenience.

[REDACTED] and DJ—would also love to follow up on nailing down our meeting to discuss data transparency—let me know if there's anything I should be doing to move that along.

Thanks,

From: [REDACTED]@fb.com>

Date: Saturday, August 21, 2021 at 1:10 PM

To: [REDACTED] (HHS/OASH) [REDACTED]@hhs.gov>, [REDACTED]@who.eop.gov [REDACTED]@who.eop.gov>, Rowe, Courtney M. EOP/WHO [REDACTED]@who.eop.gov>

Subject: Covid Insight Report - 8/20

[REDACTED] Courtney and Rob,

Attached please find the latest version of our Covid Insights report detailing the top 100 posts overall and related to the vaccine for the weeks of 7/25 and 8/1.

Happy to schedule time to follow up on any questions you might have.

Thanks,

[REDACTED]
<9_17 - COVID-19 Insights.pdf>

From: [REDACTED] fb.com]
Sent: 8/17/2021 5:27:28 PM
To: [REDACTED] (HHS/OASH) [REDACTED]@hhs.gov; [REDACTED]@ostp.eop.gov; DJ Patil [REDACTED]@gmail.com]
CC: [REDACTED] fb.com]
Subject: Re: Follow up - data discussion

Hi DJ—hoping to get follow up time scheduled so that we can cover the landscape on data that we had discussed during our call with the Surgeon General—as we continue to think through on our end how we can be more transparent around vaccine content, it would be very helpful to make sure we are working from the understanding. Can we find time for our teams to get together soon?

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From: [REDACTED] fb.com>
Sent: Friday, August 6, 2021 9:02:07 PM
To: [REDACTED] (HHS/OASH) [REDACTED]@hhs.gov> [REDACTED]@ostp.eop.gov
[REDACTED]@ostp.eop.gov>; DJ Patil <[REDACTED]@gmail.com>
Cc: [REDACTED] fb.com> [REDACTED] fb.com>
Subject: Re: Follow up - data discussion

Thanks [REDACTED]

Appreciate you connecting us to DJ here —and look forward to scheduling time for a longer conversation around data per our last meeting. DJ—let me know what would work best on your end. Our teams have been working on additional steps—we will have something back to you within two weeks outlining our approach.

Also including our latest bi-weekly report, which shows the top 100 most viewed overall posts on Facebook in the US, as well as the top vaccine related posts on Facebook in the US for the weeks of 7/11 - 7/17, and 7/18 - 7/24. Please distribute to whomever on the team might be interested, and let me know if you or anyone on the team has any questions.

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From: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>
Sent: Friday, August 6, 2021 4:07 PM
To: [REDACTED]@ostp.eop.gov; DJ Patil
Cc: [REDACTED]
Subject: RE: Follow up - data discussion

Hi Brian,

Hope your week has been going well. I wanted to loop DJ in on his gmail (where you may get a faster reply) on next steps for connecting about data.

Also [REDACTED]—I know on the call with [REDACTED] he'd mentioned seeing if you were able to send an update of any new/additional steps you are taking with respect to health misinformation in light of the advisory. We are asking all platforms for this type of update. Would you be able to send something over within two weeks?

Thanks so much,
[REDACTED]

From: [REDACTED] fb.com>
Sent: Wednesday, July 28, 2021 9:20 PM
To: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>; [REDACTED] ostp.eop.gov
Cc: [REDACTED] fb.com>
Subject: Re: Follow up - data discussion

[REDACTED]—making sure you saw this as well, as I know there's been a lot of attention directed toward vaccination mandates in recent days. Happy to connect on this front if helpful.

"As our offices reopen, we will be requiring anyone coming to work at any of our US campuses to be vaccinated. How we implement this policy will depend on local conditions and regulations. We will have a process for those who cannot be vaccinated for medical or other reasons and will be evaluating our approach in other regions as the situation evolves. We continue to work with experts to ensure our return to office plans prioritize everyone's health and safety." [REDACTED]
[REDACTED]

From: [REDACTED] (HHS/OASH) [REDACTED]@hhs.gov>
Date: Wednesday, July 28, 2021 at 5:42 PM
To: [REDACTED] fb.com>, [REDACTED] ostp.eop.gov [REDACTED] ostp.eop.gov>
Cc: [REDACTED] fb.com>
Subject: RE: Follow up - data discussion

Really appreciate it.

From: [REDACTED] fb.com>
Sent: Wednesday, July 28, 2021 5:41 PM
To: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>; [REDACTED] ostp.eop.gov
Cc: [REDACTED] fb.com>
Subject: Re: Follow up - data discussion

Got it—thanks [REDACTED] completely understand why you would have been a little busy this week! Will stand by, and will continue to be in touch as things develop on our end as well.

Get [Outlook for iOS](#)

From: [REDACTED] (HHS/OASH) [REDACTED]@hhs.gov>
Sent: Wednesday, July 28, 2021 5:34:10 PM
To: [REDACTED] fb.com>; [REDACTED] ostp.eop.gov <[REDACTED]@ostp.eop.gov>
Cc: [REDACTED] fb.com>
Subject: RE: Follow up - data discussion

Hey [REDACTED]

Thanks for your patience. The CDC updated guidance has kept us pretty busy this week(!). Appreciate these additional materials.

I'll circle back with more, but appreciate your understanding. [Also, DJ is out on leave for the rest of this week, so trying to sync calendars].

All the best,

From: [REDACTED] <[REDACTED]@fb.com>
Sent: Wednesday, July 28, 2021 1:16 PM
To: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov> <[REDACTED]@ostp.eop.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>
Subject: Follow up - data discussion

Hi [REDACTED] and DJ,

We're looking forward to our next meeting, where we are hoping to do a deeper dive on how we are measuring data and what steps we might be able to take to address concerns you've raised.

In the meantime, I wanted to make sure you have our response to the Washington Post piece from yesterday (linked [here](#)) that made certain claims based on survey data. Hoping this might be a useful addition to our conversation, along with making sure we cover the statistics put forward by the CCDH that have been cited by the White House regarding the disinfo dozen.

The statement is below — look forward to discussing next steps at your earliest convenience.

"The sensationalized, overstated findings of this research are not supported by what the authors report to have measured. It is unclear what their overall sample represents with respect to generalizability to the US population. For example it shows Fox News and CNN have the same size of audience, which they do not. Moreover what they claim as 'Facebook users' is a non-representative idiosyncratic subset of the Facebook population. These are examples of how their data is biased to start with and that matters when attempting to make these claims. The authors claim that people who rely on Facebook to get news and information about the coronavirus are less likely than the average American to be vaccinated. But this isn't valid without describing a representative sample of the American population, Facebook users, or measuring reliance instead of mere self-reported exposure over a short time window. What this data and methodology does suggest is that people who have not yet been vaccinated are less reachable by CNN, MSNBC, or the Biden Administration than on Facebook, making our ongoing efforts to share authoritative information and encourage vaccine uptake more important than ever."

From: [REDACTED] <[REDACTED]@fb.com>
Date: Tuesday, July 27, 2021 at 8:15 PM
To: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>
Subject: Re: Message from [REDACTED]

Hi [REDACTED] just checking at the end of the day. I'm sure you're swamped. Making sure we don't let too much time pass before getting back together with you and DJ, and whomever else might make sense.

From: [REDACTED] <[REDACTED]@fb.com>
Date: Monday, July 26, 2021 at 2:54 PM
To: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>
Subject: Re: Message from [REDACTED]

—let me know if it makes sense to sync on next steps? Would love to move forward with the meetings we identified as next steps as soon as your team is ready.

From: [REDACTED] <[REDACTED]@fb.com>
Date: Friday, July 23, 2021 at 11:20 PM
To: [REDACTED] <[REDACTED]@fb.com> (HHS/OASH) <[REDACTED]@hhs.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>, [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>
Subject: Re: Message from [REDACTED]

Including this week's updated report here. Look forward to scheduling our next working session. As always please let us know if you have any questions.

From: [REDACTED] <[REDACTED]@fb.com>
Date: Friday, July 23, 2021 at 7:29 PM
To: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@hhs.gov>
Subject: Message from [REDACTED]

Dear [REDACTED] (if I may),

Thanks again for taking the time to meet earlier today. It was very helpful to take stock after the past week and hear directly from you and your team, and to establish our next steps.

We talked about the speed at which we are all having to iterate as the pandemic progresses. I wanted to make sure you saw the steps we took just this past week to adjust policies on what we are removing with respect to misinformation, as well as steps taken to further address the "disinfo dozen": we removed 17 additional Pages, Groups, and Instagram accounts tied to the disinfo dozen (so a total of 39 Profiles, Pages, Groups, and IG accounts deleted thus far, resulting in every member of the disinfo dozen having had at least one such entity removed). We are also continuing to make 4 other Pages and Profiles, which have not yet met their removal thresholds, more difficult to find on our platform. We also expanded the group of false claims that we remove, to keep up with recent trends of misinformation that we are seeing.

We hear your call for us to do more and, as I said on the call, we're committed to working toward our shared goal of helping America get on top of this pandemic. We will reach out directly to DJ to schedule the deeper dive on how to best measure Covid related content and how to proceed with respect to the question around data. We'd also like to begin a regular cadence of meetings with your team so that we can continue to update you on our progress. You have identified 4 specific recommendations for improvement and we want to make sure to keep you informed of our work on each.

I want to again stress how critical it is that we establish criteria for measuring what's happening on an industry-wide basis, not least to reflect the way platforms are used interchangeably by users themselves. We believe that we have provided more transparency, both through CrowdTangle (the flaws of which we discussed in some detail) and through our Top 100 report, than others and that any further analysis should include a comprehensive look at what's happening across all platforms--ours and others -- if we are going to make progress in a consistent and sustained manner.

Finally, we will be sending you the latest version of our Top 100 report later today, per our regular schedule. [REDACTED] will do the honors this week as it will likely be completed at our end later today East Coast time. We really do hope that we can discuss our approach to this data set in greater detail during our next session with DJ, as we genuinely believe it is an effective way of understanding what people are actually seeing on the platform.

Once again, I want to thank you for setting such a constructive tone at the beginning of the call. We too believe that we have a strong shared interest to work together, and that we will strive to do all we can to meet our shared goals.

Best wishes

[REDACTED]

From: [redacted] fb.com]
Sent: 7/19/2021 1:34:04 PM
To: [redacted] hhs.gov]
CC: [redacted] fb.com]; [redacted] hhs.gov]; [redacted] fb.com]; [redacted] fb.com]
Subject: Re: Message from [redacted]

Hi [redacted]

Thanks so much for getting back to me – really appreciate that.

Adding [redacted] here to liaise with your office to find a time asap which is convenient for you – I'm in Spain right now but hopefully time differences can be navigated so that we speak soon enough.

All best

[redacted]

From: "Murthy, Vivek (HHS/OASH)" [redacted]
Date: Monday, July 19, 2021 at 3:29 PM
To: [redacted] p.com>
Cc: [redacted] fb.com>, [redacted] hhs.gov>, [redacted]
Subject: Re: Message from [redacted]

Hi [redacted]

Thanks for reaching out and for sharing your concerns. I know the last few days have been challenging. I'd be happy to speak directly about how we move forward. Let me know the best way to schedule some time later this week and we'll make it happen.

Best wishes and will talk soon,

[redacted]

--

[redacted]

The information in this e-mail and its attachments are confidential, pre-decisional and deliberative. Contents may include sensitive information and are for official use only. If you are not the original intended recipient, please delete the content and notify the sender.

From: [redacted] fb.com>
Sent: Friday, July 16, 2021 5:43 PM
To: Murthy, Vivek (HHS/OASH) [redacted]
Cc: [redacted] fb.com>
Subject: Message from [redacted]

Dear [redacted]

Reaching out after what has transpired over the past few days following the publication of the misinformation advisory, and culminating today in the President's remarks about us. I know our teams met today to better understand the scope of what the White House expects from us on misinformation going forward.

In our previous conversations I've appreciated the way you and your team have approached our engagement, and we have worked hard to meet the moment — we've dedicated enormous time and resources to fighting this pandemic and consider ourselves to be partners in fighting the same battle. Certainly we understand (and have understood for some time) that there is disagreement on some of the policies governing our approach and how they are being enforced — even as your team has acknowledged the unprecedented scale of our efforts to provide authoritative information to millions of Americans and to help them get vaccinated. But I thought the way we were singled out over the past few days has been both surprising and misleading, and I believe unproductive to our joint efforts too.

I would appreciate the opportunity to speak directly to discuss a path forward with you and how we can continue to work toward what I sincerely believe are shared goals.

Yours

A solid black rectangular redaction box covering the signature area.

From: [REDACTED]@fb.com]
Sent: 8/20/2021 3:08:20 PM
To: [REDACTED]@hhs.gov]
CC: [REDACTED]@hhs.gov; [REDACTED]@gmail.com; [REDACTED]@fb.com]
Subject: Facebook Covid actions

Dear [REDACTED]

Many thanks again for the recent opportunity to discuss our Covid related work. You asked for an update on existing and new steps that Facebook is taking. As you know, Facebook takes its responsibility during this prolonged, unprecedented public health crisis extremely seriously. In light of our conversation we have been reviewing our efforts to combat COVID-19, and are eager to continue working towards our shared goal of helping more people get vaccinated and limiting the spread of harmful misinformation.

The White House described four recommendations to social media platforms in July, which cover access to authoritative information, enforcement and speed of enforcement, and transparency. Those are priorities we have shared throughout the COVID-19 pandemic. In this update, we describe both our historic actions in these areas, as well as new information on boosting access to authoritative information, and further policy work to enable stronger action against persistent distributors of vaccine misinformation. Finally, as agreed at our last meeting, we remain eager to meet with you and/or your team about our ideas regarding data that could potentially be shared with the public.

Elevating access to better information

We continue to review, experiment and adapt to find better ways to increase access to quality information, as we have done since the start of the pandemic:

- We have heard your and others' concern that people should be better able to access authoritative information on our platform. We agree, and have already taken action to make it easier for people to find more authoritative and trusted information in News Feed. We would be happy to describe these efforts to you in a specific briefing.
- We continue to help people directly access accurate information through the COVID Information Center, and will keep adding to this as the situation evolves and especially as guidance for various populations is updated - including when children should get vaccinated, and when the already vaccinated should be getting boosters.
- So far we have connected over 2 billion people globally with resources about COVID, and in the US alone we've helped over 4 million people get vaccinated through our Vaccine Finder, which connects them with appointment information, directions, and contact information.
- We're continuing to refine how we help health partners reach communities with less access to information or lower vaccination rates, leveraging the CDC's Social Vulnerability Index and other resources to reach those populations with high-quality, authoritative information.

Limiting Potentially Harmful Information

We continue to improve and refine measures that reduce the spread of potentially harmful content and limit the distribution of actors who share misleading information about COVID and the vaccine:

- We will shortly be expanding our COVID policies to further reduce the spread of potentially harmful content on our platform. These changes will apply across Facebook and Instagram.
 - We are increasing the strength of our demotions for COVID and vaccine-related content that third party fact checkers rate as "Partly False" or "Missing Context." That content will now be demoted at the same strength that we demote any content on our platform rated "False."
 - We are making it easier to have Pages/Groups/Accounts demoted for sharing COVID and vaccine-related misinformation by also counting content removals under our COVID and vaccine-related Community Standards violations towards their demotion threshold.
 - Any entity linked to another entity that is removed for violating our COVID or vaccine misinformation policies will be rendered "non-recommendable" on our platform.
 - Lastly, we will also be strengthening our existing demotion penalties for websites that are repeatedly fact-checked for COVID and vaccine misinformation content shared on our platform. Together, we intend for these policies to further limit the traction that misinformation can get on our platform.

- To date, we've removed over 20 million pieces of content for COVID- and vaccine-related misinformation. We've also taken action against people who repeatedly post content that violates our policies. Since the beginning of the pandemic, we have removed over 3,000 accounts, Pages, and groups for repeatedly violating our rules against spreading COVID and vaccine misinformation.
- We've specifically investigated the people sometimes identified in the media as the 'Disinfo Dozen'. We've applied penalties to some of their website domains as well so any posts, including their website content, are moved lower in News Feed. The remaining accounts associated with these individuals are not posting content that breaks our rules, have only posted a small amount of violating content, which we've removed, or are simply inactive. In fact, these 12 people are responsible for about just 0.05% of all views of vaccine-related content on Facebook. This includes all vaccine-related posts they've shared, whether true or false, as well as URLs associated with these people. In total we have removed three dozen Pages, groups and Facebook or Instagram accounts linked to these 12 people, including at least one linked to each of the 12 people, for violating our policies.
- We continue to notify people when content that they have interacted with is removed for violating our policies on COVID and vaccines.
- We have implemented and continue to experiment with signals that we can use -- around specific kinds of sharing behavior, specific page types, and specific types of language, among other factors -- to demote content that we predict will contain low quality information.

Increasing Transparency

We will continue to seek to ensure the actions we are taking (as well as misses) are apparent and discernible by people who don't work at Facebook. We are especially keen to discuss with you what form shared data could take in order to be most valuable to analysts and researchers, both inside and outside of government.

In terms of what we're doing now:

- We already have a wide amount of data available for analysis through our academic partnerships like FORT, but we are keenly aware that more kinds of data, or more specific cuts, may be valuable to the people actively looking to study this area more closely. We also share data with the public through our quarterly Community Standards Enforcement Report releases, [most recently this past Wednesday](#), and have also [just launched a Widely View Content Report](#) to further increase transparency with the public.
- We are currently deep in internal discussions to identify the best ways we can share with the public information about some of the most widely viewed content on Facebook. We're actively considering how we can best share that information so that it is valuable to the public and to researchers, which to the best of our knowledge no other company provides.
- We're also looking at ways we can produce more data and deeper data sets that can create richer opportunities for researchers to analyse the reach of various kinds of content.
- We have examined the distribution patterns of the so-called 'Disinfo Dozen' (as above - <https://about.fb.com/news/2021/08/taking-action-against-vaccine-misinformation-superspreaders/>).
- To advance public understanding of how social media and behavioral sciences can be leveraged to improve the health of communities around the world, we've supported researchers attempting to understand social media's role in the ongoing pandemic. One report [has already been published](#), and we are pleased to see that social media can have positive impacts on public health needs. There are other researchers we are supporting, and look forward to reviewing their work as it is completed and peer reviewed.
- While separate from the issue of content online, researchers are also able to access our COVID-19 Trends and Impact Survey, which is a global survey gathering insights about symptoms, testing, mask-wearing, social distancing, mental health, vaccine acceptance, reasons for vaccine hesitancy, and more. We believe this is the largest public health survey in history. Over 70 million responses from more than 200 countries and territories have been collected, and the data can be broken down by self-reported demographic information like gender and race as well as by hyper-local geographic regions. The data is available in near real-time and is collected off-platform by academic partners at the University of Maryland (UMD) and Carnegie Mellon University (CMU). Academic and nonprofit researchers are able request access to non-public, non-aggregated survey data for their research.

I hope this is a useful update, pending further work and discussions we will continue to update you and your teams and we are happy to meet and discuss any of the work we have outlined here. Please do not hesitate to reach out to me or my team with any further questions.

Best wishes,



From: [REDACTED]@fb.com]
Sent: 7/10/2021 8:00:40 AM
To: [REDACTED]@hhs.gov]
CC: Slavitt, Andrew M. [REDACTED]@who.eop.gov]; [REDACTED]@fb.com]
Subject: Re: Facebook Covid report
Attachments: 7_8 - COVID-19 Insights.pdf

Dear [REDACTED]

Attached is the latest Covid report covering the most recent two week period for which we have stats etc. I understand from [REDACTED] that my team is meeting with yours next week to delve deeper into our covid misinformation efforts. As always, please don't hesitate to reach out when/if needed.

All best

From: [REDACTED]@fb.com>
Date: Friday, June 25, 2021 at 11:19 PM
To: [REDACTED]@hhs.gov>
Cc: "Slavitt, Andrew M. [REDACTED]@who.eop.gov>, [REDACTED]@fb.com>
Subject: Facebook Covid report

Dear [REDACTED]

Attached is the latest Covid report covering the past two weeks. As always, happy to answer any questions you might have with respect to the report's contents.

Additionally, I want to highlight two vaccine-related efforts that launched this week:

The first is the [WhatsApp chat bot](#) we launched with the CDC. This Spanish-language bot not only surfaces local vaccine appointments, it also links users with free Uber/Lyft rides to their appointments and childcare availability nearby. We're excited by the impact this will have on the LatinX vaccination rate.

Second, I wanted to share that we launched a notification to every Instagram user in the United States encouraging them to visit vaccines.gov. After months of state-specific notifications to IG's +150M users in the US, this is Instagram's first push to vaccines.gov. Based on the demographics of Instagram, we're looking forward to reaching the nation's youth and to having a positive impact on their vaccination rates.

Thanks and please don't hesitate to reach out.

Best

From: [REDACTED] fb.com]
Sent: 6/25/2021 6:19:30 PM
To: [REDACTED]@hhs.gov]
CC: Slavitt, Andrew [REDACTED] who.eop.gov]; [REDACTED] fb.com]
Subject: Facebook Covid report
Attachments: 6_25 - COVID-19 Insights.pdf

Dear [REDACTED],

Attached is the latest Covid report covering the past two weeks. As always, happy to answer any questions you might have with respect to the report's contents.

Additionally, I want to highlight two vaccine-related efforts that launched this week:

The first is the [WhatsApp chat bot](#) we launched with the CDC. This Spanish-language bot not only surfaces local vaccine appointments, it also links users with free Uber/Lyft rides to their appointments and childcare availability nearby. We're excited by the impact this will have on the LatinX vaccination rate.

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Thanks and please don't hesitate to reach out.

Best

[REDACTED]

From: [REDACTED] [fb.com]
Sent: 6/12/2021 9:28:58 PM
To: [REDACTED]@hhs.gov
CC: [REDACTED]@who.eop.gov; [REDACTED] [fb.com]
Subject: Facebook bi-weekly covid content report
Attachments: 6_11 - COVID-19 Insights.pdf

Dear [REDACTED]

As promised/discussed, the latest Facebook bi-weekly covid content report attached. As always, I'm happy to jump on a call at any point – as is my team – to delve into any details further as needed.

All best

[REDACTED]

From: [REDACTED] fb.com]
 Sent: 5/28/2021 5:48:14 PM
 To: Slavitt, Andrew M. EOP/WHO [REDACTED] who.eop.gov]; [REDACTED]
 [REDACTED]@hhs.gov]
 CC: [REDACTED] fb.com]
 Subject: Message from [REDACTED]
 Attachments: 5_28 - COVID-19 Insights.pdf

Dear Andy, dear [REDACTED] (if I may),

Thanks again for the time the other day.

As promised, I'm sending our latest report that includes topline performing posts for the weeks of 5/3-5/9 and 5/9-5/15. Report is attached, and myself and the team are of course happy to discuss anything within.

I also want to highlight a few policy updates we announced yesterday regarding repeat misinformation. The full Newsroom post with product mock ups is available [here](#), but I wanted to call out a few key points:

1. We've added more context about Pages that repeatedly share false claims;
2. We are expanding penalties for individual Facebook accounts that share misinformation; and
3. We've redesigned notifications when they share content that a fact-checker later rates.

Finally, I wanted to include here the data I mentioned on our call earlier that point to the positive (if not as publicly discussed) influence we're having on attitudes toward vaccines:

Overall trends in vaccine acceptance amongst Facebook users are positive: this has increased considerably since January, and racial/ethnic disparities have also decreased.

Since January, vaccine acceptance in the US from a daily survey of Facebook users (done in partnership with CMU) has *increased* by 10-15 percentage points (e.g. 70 %-> 80-85%), and racial/ethnic disparities in acceptance have shrunk considerably (e.g. some of the populations that had the lowest acceptance in January had the highest increases since).

Not only are the overall trends increasing, we also have data showing our efforts are contributing: including some of our specific collaborations with HHS/CDC and work around trusted messengers and messaging.

Over the same time period, we've been working closely with partners to run the largest scale on line campaign in support of vaccination efforts. We've delivered over 10B ad impressions from health partners worldwide since January, and have also run significant on-platform product promotions. These have been focused on 3 goals: i) increase access to vaccines; ii) help people get questions answered; iii) socially normalize the vaccine.

Early evidence that these are increasing drivers of vaccination, at scale, include:

- **Social Norming: 50 percent of Facebook users have seen someone they follow (e.g. friend, family member, community leader, public figure) use an HHS/CDC vaccine frame.** [Research from MIT shows](#) that similar types of social normalization efforts can meaningfully improve people's likelihood to get vaccinated, which is consistent with other [expert advice](#) (e.g. "Encouraging those who are vaccinated to show their vaccination status with pride, both online and offline, can nudge their family, friends and networks to follow suit."). We are seeing some encouraging preliminary results in vaccine sentiment (the safety and importance of COVID-19 vaccines) in the US through our surveys as a result of vaccine profile frame promotions. As a result, we are scaling the launch of these features globally.
- **Access: Over 3M people have used our Vaccine Finder since March, developed in partnership with Boston Children's Hospital.** We've been promoting Vaccine Finder and eligibility information to all people on Facebook in close partnership with states, which are seeing impact. For example, West Virginia reported a meaningful increase in vaccine registrations after we started our efforts.
- **Education: A single "Facts about COVID19" News Feed campaign — that reached 100s of millions of people worldwide--increased belief in key facts about vaccine safety and testing by 3% across 5 countries.** We've directed 2B+

people to expert health resources through the Covid Info Center, which in the US includes information from local county-level public health departments. We observed a particularly large increase in vaccine acceptance within certain populations in the US. Vaccine acceptance increased 26% among Black adults and 14% among Hispanic adults.

- **Equity: We're more frequently reaching people in areas with lower vaccination rates using CDC's Social Vulnerability Index.** We are partnering with a wide range of organizations to deliver trusted, accessible messages; Spanish-language campaigns from AARP and Johns Hopkins University's Bloomberg School of Public Health; and CARE US for conservative audiences. Our work to promote information on how to get a vaccine to high-SVI zip codes increased confidence that people in those zip codes have in being able to get a vaccine.

This builds on work—and uses similar strategies—to what we did over the last few years to support flu vaccination, mask wearing, blood donation, and voting, all of which also had meaningful population-level positive impact.

- **Flu Vaccination:** We employed similar strategies with partners around a major flu vaccination campaign last fall. These reached 10s of millions of people in the US; some of these campaigns increased perceived safety or intent by 3-5%.

- **Mask Wearing:** Social normalization campaigns reaching millions of people featuring trusted public figures increased mask wearing behavior and attitudes by 3-8%. This included the "You Will See Me" campaign from CDC Foundation/Ad Council. Note that mask wearing attitudes and reported behaviors increased dramatically since early spring 2020, and by summer the [vast majority of all people in the US reported wearing masks](#), a trend mirrored in CMU's large-scale survey of Facebook users.

- **Blood Donations:** Our blood donations product—which notifies people nearby about opportunities to donate blood, and makes it easy for them to find a schedule an appointment—[increased first time donors across the US by 19% when we rolled it out](#) across sites from the American Red Cross, Vitalant, Versiti, and New York Blood Centers.

We think there's considerably more we can do in partnership with you and your teams to drive behavior. We're also committed to addressing the defensive work around misinformation that you've called on us to address. But we don't want to miss the full story of Facebook's impact on attitudes toward vaccine acceptance—we believe our work is paying real dividends in the form of more people getting shots, and we believe data bears this out. We're eager to find additional ways to partner with you.

All my best wishes,

██████

From: [REDACTED]
Sent: 6/14/2021 3:34:01 AM
To: [REDACTED] [fb.com]
CC: Slavitt, Andrew M. [REDACTED] [hhs.gov]; [REDACTED] [who.eop.gov]; [REDACTED] [fb.com]; [REDACTED]
Subject: Re: Facebook bi-weekly covid content report

Many thanks for sharing this [REDACTED] I'll look forward to reviewing it.

Hope you're keeping well,
[REDACTED]

Sent from my iPhone

On Jun 12, 2021, at 9:29 PM, [REDACTED] [fb.com] wrote:

Dear [REDACTED]

As promised/discussed, the latest Facebook bi-weekly covid content report attached. As always, I'm happy to jump on a call at any point – as is my team – to delve into any details further as needed.

All best

[REDACTED]
<6_11 - COVID-19 Insights.pdf>

From: [REDACTED] fb.com]
Sent: 8/31/2021 3:43:19 PM
To: [REDACTED] (HHS/OASH) [REDACTED] hhs.gov]
Subject: Re: Facebook Covid actions

Flag: Follow up

Hi [REDACTED]—hope you're well. Just checking back in on setting a potential meeting—don't want it to fall through the cracks on our end.

Thanks—look forward to being in touch.

From: [REDACTED] (HHS/OASH) [REDACTED]@hhs.gov>
Date: Monday, August 23, 2021 at 10:38 AM
To: [REDACTED] fb.com>
Subject: RE: Facebook Covid actions

Hi [REDACTED]

Thanks so much for following up. I'll circle with [REDACTED] and the team. Definitely want to keep moving the ball forward.

Best,
[REDACTED]

From: [REDACTED] fb.com>
Sent: Friday, August 20, 2021 4:11 PM
To: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>
Subject: Fwd: Facebook Covid actions

Hi [REDACTED]—following up just with you. We wanted to make sure to get you our latest plan within the two week window that you requested, but this represents a snapshot of where we are today, not a final destination. We're continuing to look for ways to be responsive, and would very much like to schedule time with [REDACTED] to cover possible approaches for increased transparency.

Let me know if helpful to connect.

Thanks and have a good weekend.

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From: [REDACTED] fb.com>
Sent: Friday, August 20, 2021 3:08:20 PM
To: [REDACTED]@hhs.gov [REDACTED]@hhs.gov>
Cc: [REDACTED] (HHS/OASH) [REDACTED]@hhs.gov>; [REDACTED]@gmail.com [REDACTED]@gmail.com>; [REDACTED]@fb.com>
Subject: Facebook Covid actions

Dear Surgeon General

Many thanks again for the recent opportunity to discuss our Covid related work. You asked for an update on existing and new steps that Facebook is taking. As you know, Facebook takes its responsibility during this prolonged, unprecedented public health crisis extremely seriously. In light of our conversation we have been reviewing our efforts to combat COVID-19, and are eager to continue working towards our shared goal of helping more people get vaccinated and limiting the spread of harmful misinformation.

The White House described four recommendations to social media platforms in July, which cover access to authoritative information, enforcement and speed of enforcement, and transparency. Those are priorities we have shared throughout the COVID-19 pandemic. In this update, we describe both our historic actions in these areas, as well as new information on boosting access to authoritative information, and further policy work to enable stronger action against persistent distributors of vaccine misinformation. Finally, as agreed at our last meeting, we remain eager to meet with you and/or your team about our ideas regarding data that could potentially be shared with the public.

Elevating access to better information

We continue to review, experiment and adapt to find better ways to increase access to quality information, as we have done since the start of the pandemic:

- We have heard your and others' concern that people should be better able to access authoritative information on our platform. We agree, and have already taken action to make it easier for people to find more authoritative and trusted information in News Feed. We would be happy to describe these efforts to you in a specific briefing.
- We continue to help people directly access accurate information through the COVID Information Center, and will keep adding to this as the situation evolves and especially as guidance for various populations is updated - including when children should get vaccinated, and when the already vaccinated should be getting boosters.
- So far we have connected over 2 billion people globally with resources about COVID, and in the US alone we've helped over 4 million people get vaccinated through our Vaccine Finder, which connects them with appointment information, directions, and contact information.
- We're continuing to refine how we help health partners reach communities with less access to information or lower vaccination rates, leveraging the CDC's Social Vulnerability Index and other resources to reach those populations with high-quality, authoritative information.

Limiting Potentially Harmful Information

We continue to improve and refine measures that reduce the spread of potentially harmful content and limit the distribution of actors who share misleading information about COVID and the vaccine:

- We will shortly be expanding our COVID policies to further reduce the spread of potentially harmful content on our platform. These changes will apply across Facebook and Instagram.
 - We are increasing the strength of our demotions for COVID and vaccine-related content that third party fact checkers rate as "Partly False" or "Missing Context." That content will now be demoted at the same strength that we demote any content on our platform rated "False."
 - We are making it easier to have Pages/Groups/Accounts demoted for sharing COVID and vaccine-related misinformation by also counting content removals under our COVID and vaccine-related Community Standards violations towards their demotion threshold.
 - Any entity linked to another entity that is removed for violating our COVID or vaccine misinformation policies will be rendered "non-recommendable" on our platform.
 - Lastly, we will also be strengthening our existing demotion penalties for websites that are repeatedly fact-checked for COVID and vaccine misinformation content shared on our platform. Together, we intend for these policies to further limit the traction that misinformation can get on our platform.
- To date, we've removed over 20 million pieces of content for COVID- and vaccine-related misinformation. We've also taken action against people who repeatedly post content that violates our policies. Since the beginning of the pandemic, we have removed over 3,000 accounts, Pages, and groups for repeatedly violating our rules against spreading COVID and vaccine misinformation.
- We've specifically investigated the people sometimes identified in the media as the 'Disinfo Dozen'. We've applied penalties to some of their website domains as well so any posts, including their website content, are moved lower in News Feed. The remaining accounts associated with these individuals are not posting content that breaks our rules, have only posted a small amount of violating content, which we've removed, or are simply inactive. In fact, these 12 people are responsible for about just 0.05% of all views of vaccine-related content on Facebook. This includes all vaccine-related posts they've shared, whether true or false, as well as URLs associated with these

people. In total we have removed three dozen Pages, groups and Facebook or Instagram accounts linked to these 12 people, including at least one linked to each of the 12 people, for violating our policies.

- We continue to notify people when content that they have interacted with is removed for violating our policies on COVID and vaccines.
- We have implemented and continue to experiment with signals that we can use -- around specific kinds of sharing behavior, specific page types, and specific types of language, among other factors -- to demote content that we predict will contain low quality information.

Increasing Transparency

We will continue to seek to ensure the actions we are taking (as well as misses) are apparent and discernible by people who don't work at Facebook. We are especially keen to discuss with you what form shared data could take in order to be most valuable to analysts and researchers, both inside and outside of government.

In terms of what we're doing now:

- We already have a wide amount of data available for analysis through our academic partnerships like FORT, but we are keenly aware that more kinds of data, or more specific cuts, may be valuable to the people actively looking to study this area more closely. We also share data with the public through our quarterly Community Standards Enforcement Report releases, [most recently this past Wednesday](#), and have also [just launched a Widely View Content Report](#) to further increase transparency with the public.
- We are currently deep in internal discussions to identify the best ways we can share with the public information about some of the most widely viewed content on Facebook. We're actively considering how we can best share that information so that it is valuable to the public and to researchers, which to the best of our knowledge no other company provides.
- We're also looking at ways we can produce more data and deeper data sets that can create richer opportunities for researchers to analyse the reach of various kinds of content.
- We have examined the distribution patterns of the so-called 'Disinfo Dozen' (as above - <https://about.fb.com/news/2021/08/taking-action-against-vaccine-misinformation-superspreaders/>).
- To advance public understanding of how social media and behavioral sciences can be leveraged to improve the health of communities around the world, we've supported researchers attempting to understand social media's role in the ongoing pandemic. One report [has already been published](#), and we are pleased to see that social media can have positive impacts on public health needs. There are other researchers we are supporting, and look forward to reviewing their work as it is completed and peer reviewed.
- While separate from the issue of content online, researchers are also able to access our COVID-19 Trends and Impact Survey, which is a global survey gathering insights about symptoms, testing, mask-wearing, social distancing, mental health, vaccine acceptance, reasons for vaccine hesitancy, and more. We believe this is the largest public health survey in history. Over 70 million responses from more than 200 countries and territories have been collected, and the data can be broken down by self-reported demographic information like gender and race as well as by hyper-local geographic regions. The data is available in near real-time and is collected off-platform by academic partners at the University of Maryland (UMD) and Carnegie Mellon University (CMU). Academic and nonprofit researchers are able request access to non-public, non-aggregated survey data for their research.

I hope this is a useful update, pending further work and discussions we will continue to update you and your teams and we are happy to meet and discuss any of the work we have outlined here. Please do not hesitate to reach out to me or my team with any further questions.

Best wishes,



From: [REDACTED] fb.com]
Sent: 8/17/2021 5:27:28 PM
To: [REDACTED] (HHS/OASH) [REDACTED]@hhs.gov]; [REDACTED]@ostp.eop.gov; DJ Patil [REDACTED]@gmail.com]
CC: [REDACTED] fb.com]
Subject: Re: Followup - data discussion

Hi DJ—hoping to get follow up time scheduled so that we can cover the landscape on data that we had discussed during our call with the Surgeon General—as we continue to think through on our end how we can be more transparent around vaccine content, it would be very helpful to make sure we are working from the understanding. Can we find time for our teams to get together soon?

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From: [REDACTED] fb.com>
Sent: Friday, August 6, 2021 9:02:07 PM
To: [REDACTED] (HHS/OASH) [REDACTED]@hhs.gov> [REDACTED]@ostp.eop.gov
[REDACTED]@ostp.eop.gov>; DJ Patil <[REDACTED]@gmail.com>
Cc: [REDACTED] fb.com> [REDACTED] fb.com>
Subject: Re: Follow up - data discussion

Thanks [REDACTED]

Appreciate you connecting us to [REDACTED] here—and look forward to scheduling time for a longer conversation around data per our last meeting. [REDACTED]—let me know what would work best on your end. Our teams have been working on additional steps—we will have something back to you within two weeks outlining our approach.

Also including our latest bi-weekly report, which shows the top 100 most viewed overall posts on Facebook in the US, as well as the top vaccine related posts on Facebook in the US for the weeks of 7/11 - 7/17, and 7/18 - 7/24. Please distribute to whomever on the team might be interested, and let me know if you or anyone on the team has any questions.

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From: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>
Sent: Friday, August 6, 2021 4:07 PM
To: [REDACTED]@ostp.eop.gov; [REDACTED]
Cc: [REDACTED]
Subject: RE: Follow up - data discussion

Hi [REDACTED],

Hope your week has been going well. I wanted to loop [REDACTED] in on his gmail (where you may get a faster reply) on next steps for connecting about data.

Also [REDACTED]—I know on the call with [REDACTED] he'd mentioned seeing if you were able to send an update of any new/additional steps you are taking with respect to health misinformation in light of the advisory. We are asking all platforms for this type of update. Would you be able to send something over within two weeks?

Thanks so much,
[REDACTED]

From: [REDACTED] fb.com>
Sent: Wednesday, July 28, 2021 9:20 PM
To: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>; [REDACTED] ostp.eop.gov
Cc: [REDACTED] fb.com>
Subject: Re: Follow up - data discussion

[REDACTED]—making sure you saw this as well, as I know there's been a lot of attention directed toward vaccination mandates in recent days. Happy to connect on this front if helpful.

"As our offices reopen, we will be requiring anyone coming to work at any of our US campuses to be vaccinated. How we implement this policy will depend on local conditions and regulations. We will have a process for those who cannot be vaccinated for medical or other reasons and will be evaluating our approach in other regions as the situation evolves. We continue to work with experts to ensure our return to office plans prioritize everyone's health and safety." [REDACTED]
[REDACTED]

From: [REDACTED] (HHS/OASH) [REDACTED]@hhs.gov>
Date: Wednesday, July 28, 2021 at 5:42 PM
To: [REDACTED] fb.com>, [REDACTED] ostp.eop.gov [REDACTED] ostp.eop.gov>
Cc: [REDACTED] fb.com>
Subject: RE: Follow up - data discussion

Really appreciate it.

From: [REDACTED] fb.com>
Sent: Wednesday, July 28, 2021 5:41 PM
To: [REDACTED] (HHS/OASH) [REDACTED]@hhs.gov>; [REDACTED] ostp.eop.gov
Cc: [REDACTED] fb.com>
Subject: Re: Follow up - data discussion

Got it—thanks [REDACTED] completely understand why you would have been a little busy this week! Will stand by, and will continue to be in touch as things develop on our end as well.

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From: [REDACTED] (HHS/OASH) [REDACTED]@hhs.gov>
Sent: Wednesday, July 28, 2021 5:34:10 PM
To: [REDACTED] fb.com>; [REDACTED] ostp.eop.gov <[REDACTED]@ostp.eop.gov>
Cc: [REDACTED] fb.com>
Subject: RE: Follow up - data discussion

Hey [REDACTED]

Thanks for your patience. The CDC updated guidance has kept us pretty busy this week (!). Appreciate these additional materials.

I'll circle back with more, but appreciate your understanding. [Also, [REDACTED] is out on leave for the rest of this week, so trying to sync calendars].

All the best,

From: [REDACTED] <[REDACTED]@fb.com>
Sent: Wednesday, July 28, 2021 1:16 PM
To: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov> [REDACTED] <[REDACTED]@ostp.eop.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>
Subject: Follow up - data discussion

Hi [REDACTED] and DJ,

We're looking forward to our next meeting, where we are hoping to do a deeper dive on how we are measuring data and what steps we might be able to take to address concerns you've raised.

In the meantime, I wanted to make sure you have our response to the Washington Post piece from yesterday (linked [here](#)) that made certain claims based on survey data. Hoping this might be a useful addition to our conversation, along with making sure we cover the statistics put forward by the CCDH that have been cited by the White House regarding the disinfo dozen.

The statement is below — look forward to discussing next steps at your earliest convenience.

"The sensationalized, overstated findings of this research are not supported by what the authors report to have measured. It is unclear what their overall sample represents with respect to generalizability to the US population. For example it shows Fox News and CNN have the same size of audience, which they do not. Moreover what they claim as 'Facebook users' is a non-representative idiosyncratic subset of the Facebook population. These are examples of how their data is biased to start with and that matters when attempting to make these claims. The authors claim that people who rely on Facebook to get news and information about the coronavirus are less likely than the average American to be vaccinated. But this isn't valid without describing a representative sample of the American population, Facebook users, or measuring reliance instead of mere self-reported exposure over a short time window. What this data and methodology does suggest is that people who have not yet been vaccinated are less reachable by CNN, MSNBC, or the Biden Administration than on Facebook, making our ongoing efforts to share authoritative information and encourage vaccine uptake more important than ever."

From: [REDACTED] <[REDACTED]@fb.com>
Date: Tuesday, July 27, 2021 at 8:15 PM
To: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>
Subject: Re: Message from [REDACTED]

Hi [REDACTED] just checking at the end of the day. I'm sure you're swamped. Making sure we don't let too much time pass before getting back together with you and [REDACTED], and whomever else might make sense.

From: [REDACTED] <[REDACTED]@fb.com>
Date: Monday, July 26, 2021 at 2:54 PM
To: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>
Subject: Re: Message from [REDACTED]

Let me know if it makes sense to sync on next steps? Would love to move forward with the meetings we identified as next steps as soon as your team is ready.

From: [REDACTED] <[REDACTED]@fb.com>
Date: Friday, July 23, 2021 at 11:20 PM
To: [REDACTED] <[REDACTED]@fb.com> (HHS/OASH) <[REDACTED]@hhs.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>, [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>
Subject: Re: Message from [REDACTED]

Including this week's updated report here. Look forward to scheduling our next working session. As always please let us know if you have any questions.

From: [REDACTED] <[REDACTED]@fb.com>
Date: Friday, July 23, 2021 at 7:29 PM
To: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@hhs.gov>
Subject: Message from [REDACTED]

Dear [REDACTED] (if I may),

Thanks again for taking the time to meet earlier today. It was very helpful to take stock after the past week and hear directly from you and your team, and to establish our next steps.

We talked about the speed at which we are all having to iterate as the pandemic progresses. I wanted to make sure you saw the steps we took just this past week to adjust policies on what we are removing with respect to misinformation, as well as steps taken to further address the "disinfo dozen": we removed 17 additional Pages, Groups, and Instagram accounts tied to the disinfo dozen (so a total of 39 Profiles, Pages, Groups, and IG accounts deleted thus far, resulting in every member of the disinfo dozen having had at least one such entity removed). We are also continuing to make 4 other Pages and Profiles, which have not yet met their removal thresholds, more difficult to find on our platform. We also expanded the group of false claims that we remove, to keep up with recent trends of misinformation that we are seeing.

We hear your call for us to do more and, as I said on the call, we're committed to working toward our shared goal of helping America get on top of this pandemic. We will reach out directly to [REDACTED] to schedule the deeper dive on how to best measure Covid related content and how to proceed with respect to the question around data. We'd also like to begin a regular cadence of meetings with your team so that we can continue to update you on our progress. You have identified 4 specific recommendations for improvement and we want to make sure to keep you informed of our work on each.

I want to again stress how critical it is that we establish criteria for measuring what's happening on an industry-wide basis, not least to reflect the way platforms are used interchangeably by users themselves. We believe that we have provided more transparency, both through CrowdTangle (the flaws of which we discussed in some detail) and through our Top 100 report, than others and that any further analysis should include a comprehensive look at what's happening across all platforms—ours and others – if we are going to make progress in a consistent and sustained manner.

Finally, we will be sending you the latest version of our Top 100 report later today, per our regular schedule. [REDACTED] will do the honors this week as it will likely be completed at our end later today East Coast time. We really do hope that we can discuss our approach to this data set in greater detail during our next session with [REDACTED], as we genuinely believe it is an effective way of understanding what people are actually seeing on the platform.

Once again, I want to thank you for setting such a constructive tone at the beginning of the call. We too believe that we have a strong shared interest to work together, and that we will strive to do all we can to meet our shared goals.

Best wishes

[REDACTED]

From: [REDACTED]
Sent: 11/3/2021 2:57:44 PM
To: [REDACTED]@fb.com]; [REDACTED]@fb.com]
Subject: RE: Our announcement

Hi [REDACTED]

Thanks for your note. I really appreciate it.

Let me get back to you next week once we are done crashing on our rollout for vaccines 5-11.

All the best,
[REDACTED]

From: [REDACTED]@fb.com>
Sent: Friday, October 29, 2021 9:42 PM
To: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>; [REDACTED]@fb.com>
Subject: Re: Our announcement

Thanks [REDACTED]—we'd appreciate the opportunity to meet and discuss concerns you have related to the recent press reports. We feel strongly that much of the reporting is based on documents that have been taken out of context and don't tell the full story of our work. Please let me know if you'd have time to connect next week.

Thanks—have a good weekend.
[REDACTED]

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From: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>
Sent: Friday, October 29, 2021 10:18 AM
To: [REDACTED]
Subject: FW: Our announcement

Good afternoon, [REDACTED],

I hope this email finds you well. I'm back from my paternity leave stint and getting my sea legs in the office with a six week old at home.

Thank you for this note to [REDACTED]. I did want to say that we have seen the recent public reports around Facebook and misinformation. We are certainly concerned about what we are seeing, given our emphasis on health misinformation in our advisory and the ongoing conversations our teams have been having. As has been the case, you'll continue to see us raising the issue of health misinformation in public and private as a critical public health issue.

All the best,
[REDACTED]

From: [REDACTED] <[REDACTED]@fb.com>
Date: October 28, 2021 at 6:31:51 PM EDT
To: [REDACTED] <[REDACTED]@hhs.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>
Subject: Our announcement

Dear [REDACTED]

I hope you are well. It's been a while since we connected. I know our teams have remained in close contact with respect to our work to provide authoritative information about the vaccine and we are working on how we can partner in this next push to vaccinate children. We appreciate the opportunity to partner with your team.

I also wanted to be in touch to update you on an announcement we made today. Mark announced that we will have a new company brand - Meta - which signals our commitment to build the next evolution of social technology - beyond what digital connection makes possible today. We believe the ultimate promise of technology is to improve people's lives. With the metaverse, we see the opportunity to bring people together in ways never before possible in the next decade. We are starting this conversation early so that we can make sure it's built on solid foundations when it comes to things like privacy, safety, and economic opportunity.

While we are looking to the future, our mission hasn't changed, and neither has the sense of responsibility that we have to the billions of people who use our apps and services every day. We're proud of our record navigating the complex tradeoffs involved in operating services at global scale, and of our massive investments in safety and security. We also continue to believe more regulation is necessary. We are on the cusp of a new era of technology but - in many countries - we still don't yet have rules in place for this one.

As we begin to work on the next evolution of technology and of our company, I wanted to let you know and make myself available to hear your thoughts, questions, and feedback. We know the metaverse can be hard to grasp - not unlike trying to describe the World Wide Web in the early 1990s - but we believe this technology will be an important part of our collective future, and it is something that we will all be building together.

I also recognize the intense debate that's been prompted by the documents that have been disclosed by a former employee. You and I have touched on the subject of wellbeing in our previous conversations and I know it's an area of concern for you and for the White House. I would welcome the opportunity to meet again to hear from you and to address the claims that have been made against the company.

Best regards,

[REDACTED]

From: [REDACTED]
Sent: 8/23/2021 10:43:44 AM
To: [REDACTED]@fb.com]; [REDACTED] (HHS/OASH); [REDACTED]@hhs.gov]
CC: [REDACTED]@fb.com]
Subject: RE: Facebook Covid actions

Hi [REDACTED],

I hope this finds you well. Thank you so much for following up with this detailed note. We are grateful for you and your team's attention to the concerns we have been raising and the work to address those ongoing concerns.

[REDACTED] and I are also in touch, but we look forward to continuing to move forward together with urgency and solutions during these extraordinary times.

Best,
[REDACTED]

From: [REDACTED]@fb.com>
Sent: Friday, August 20, 2021 3:08 PM
To: [REDACTED] (HHS/OASH) <[REDACTED]@hhs.gov>
Cc: [REDACTED]@hhs.gov>; [REDACTED]@gmail.com; [REDACTED]@fb.com>
Subject: Facebook Covid actions

Dear [REDACTED]

Many thanks again for the recent opportunity to discuss our Covid related work. You asked for an update on existing and new steps that Facebook is taking. As you know, Facebook takes its responsibility during this prolonged, unprecedented public health crisis extremely seriously. In light of our conversation we have been reviewing our efforts to combat COVID-19, and are eager to continue working towards our shared goal of helping more people get vaccinated and limiting the spread of harmful misinformation.

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 - We are increasing the strength of our demotions for COVID and vaccine-related content that third party fact checkers rate as "Partly False" or "Missing Context." That content will now be demoted at the same strength that we demote any content on our platform rated "False."
 - We are making it easier to have Pages/Groups/Accounts demoted for sharing COVID and vaccine-related misinformation by also counting content removals under our COVID and vaccine-related Community Standards violations towards their demotion threshold.
 - Any entity linked to another entity that is removed for violating our COVID or vaccine misinformation policies will be rendered "non-recommendable" on our platform.
 - Lastly, we will also be strengthening our existing demotion penalties for websites that are repeatedly fact-checked for COVID and vaccine misinformation content shared on our platform. Together, we intend for these policies to further limit the traction that misinformation can get on our platform.
- To date, we've removed over 20 million pieces of content for COVID- and vaccine-related misinformation. We've also taken action against people who repeatedly post content that violates our policies. Since the beginning of the pandemic, we have removed over 3,000 accounts, Pages, and groups for repeatedly violating our rules against spreading COVID and vaccine misinformation.
- We've specifically investigated the people sometimes identified in the media as the 'Disinfo Dozen'. We've applied penalties to some of their website domains as well so any posts, including their website content, are moved lower in News Feed. The remaining accounts associated with these individuals are not posting content that breaks our rules, have only posted a small amount of violating content, which we've removed, or are simply inactive. In fact, these 12 people are responsible for about just 0.05% of all views of vaccine-related content on Facebook. This includes all vaccine-related posts they've shared, whether true or false, as well as URLs associated with these people. In total we have removed three dozen Pages, groups and Facebook or Instagram accounts linked to these 12 people, including at least one linked to each of the 12 people, for violating our policies.
- We continue to notify people when content that they have interacted with is removed for violating our policies on COVID and vaccines.
- We have implemented and continue to experiment with signals that we can use -- around specific kinds of sharing behavior, specific page types, and specific types of language, among other factors -- to demote content that we predict will contain low quality information.

Increasing Transparency

We will continue to seek to ensure the actions we are taking (as well as misses) are apparent and discernible by people who don't work at Facebook. We are especially keen to discuss with you what form shared data could take in order to be most valuable to analysts and researchers, both inside and outside of government.

In terms of what we're doing now:

- We already have a wide amount of data available for analysis through our academic partnerships like FORT, but we are keenly aware that more kinds of data, or more specific cuts, may be valuable to the people actively looking to study this area more closely. We also share data with the public through our quarterly Community Standards Enforcement Report releases, [most recently this past Wednesday](#), and have also [just launched a Widely View Content Report](#) to further increase transparency with the public.
- We are currently deep in internal discussions to identify the best ways we can share with the public information about some of the most widely viewed content on Facebook. We're actively considering how we can best share that information so that it is valuable to the public and to researchers, which to the best of our knowledge no other company provides.
- We're also looking at ways we can produce more data and deeper data sets that can create richer opportunities for researchers to analyse the reach of various kinds of content.
- We have examined the distribution patterns of the so-called 'Disinfo Dozen' (as above - <https://about.fb.com/news/2021/08/taking-action-against-vaccine-misinformation-superspreaders/>).
- To advance public understanding of how social media and behavioral sciences can be leveraged to improve the health of communities around the world, we've supported researchers attempting to understand social media's

role in the ongoing pandemic. One report [has already been published](#), and we are pleased to see that social media can have positive impacts on public health needs. There are other researchers we are supporting, and look forward to reviewing their work as it is completed and peer reviewed.

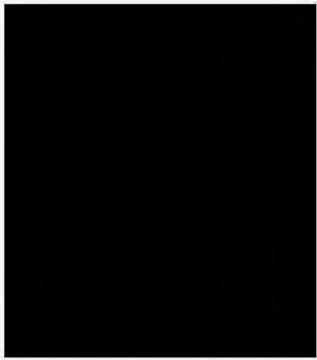
- While separate from the issue of content online, researchers are also able to access our COVID-19 Trends and Impact Survey, which is a global survey gathering insights about symptoms, testing, mask-wearing, social distancing, mental health, vaccine acceptance, reasons for vaccine hesitancy, and more. We believe this is the largest public health survey in history. Over 70 million responses from more than 200 countries and territories have been collected, and the data can be broken down by self-reported demographic information like gender and race as well as by hyper-local geographic regions. The data is available in near real-time and is collected off-platform by academic partners at the University of Maryland (UMD) and Carnegie Mellon University (CMU). Academic and nonprofit researchers are able request access to non-public, non-aggregated survey data for their research.

I hope this is a useful update, pending further work and discussions we will continue to update you and your teams and we are happy to meet and discuss any of the work we have outlined here. Please do not hesitate to reach out to me or my team with any further questions.

Best wishes,



< 469



May 27, 2021, 3:19 PM

Hi [Redacted], it's a Vivek Murthy, great to connect with you this week and looking forward to working together. Be well, Vivek

Delivered

Jul 18, 2021, 3:48 PM



Moving Past the Finger Pointing - About Facebook

about.fb.com

Hi Vivek - you may have seen this post today which we issued to provide more context. We do not plan to issue more public posts etc. I imagine you and your team are feeling a little aggrieved - as is the FB team, it's not great to be accused of killing people - but as I said by email I'm keen to find a way to deescalate and work together collaboratively. I am available to meet/speak whenever suite. With my best wishes [Redacted]

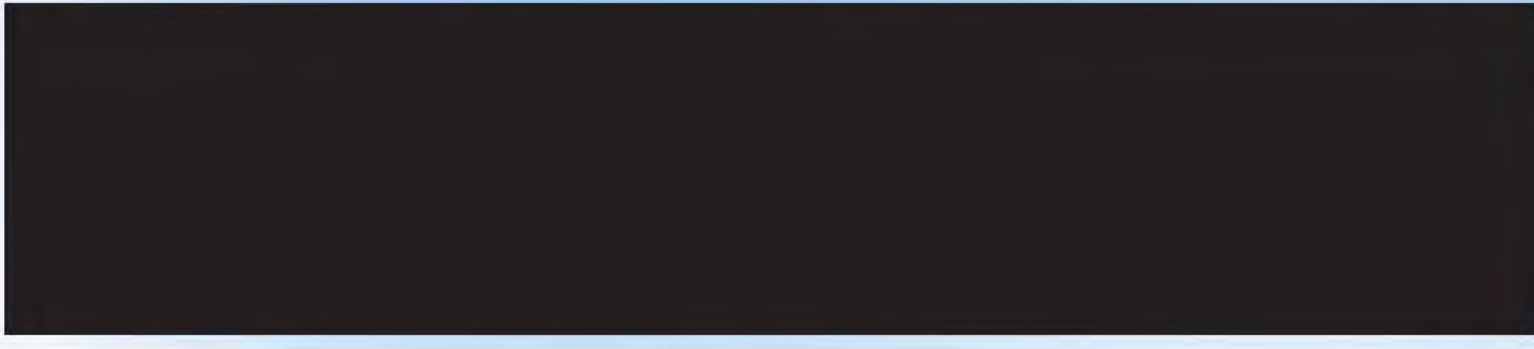


iMessage



11:15

CONFIDENTIAL



Wed, Mar 30

Hey — just a heads up that I'm coming to DC from Apr 4-13! I expect my team will reach out to see if we can connect while I'm in town. If the timing works, would love to discuss how things are going & next steps from our last call!

Two side notes: (1) we are officially members of JCDC! Comms teams are working to say something public & we're moving to get people integrated.

(2) Do you have any context you can share on the role Rob Silvers is playing on disinfo? I understand his team has a task force they've said up, and it was suggested that his team is handling "policy" on disinfo while CISA is handling "operations." That was secondhand, though, so it could easily be a garble.

My team is interested in me meeting w/him as well, so wanted to check in...

17:14

Hey there...sure happy to chat. Rob is running a governance board to look at potential new areas of confronting MDM, but it doesn't change or impact anything we are doing or have already established.

20:16

Fri, Jun 24



New Message



New iMessage

Cancel

To: [Redacted]

Sat, Feb 26, 18:00

Just wanted to send a note
That you and the cisa team are doing
amazing work at a really tough time.
The info, leadership & proactivity are
incredibly helpful.

Thank you.

Thx so much! Really appreciate it.
And sorry I didn't ring last week...
think you were on the call this week?
Just trying to get us in a place where
Fed can work with platforms to better
understand the mis/dis trends so
relevant agencies can try to prebunk/
debunk as useful...

Not our mission but was looking to
play a coord role so not every D/A is
independently reaching out to
platforms which could cause a lot of
chaos.

Was on the call. The coordination is
greatly appreciated. Was
disappointed that platforms including
us didn't offer more (we'll get there)
and sector leadership had 0



iMessage



New iMessage

Cancel

To:

Thx so much! Really appreciate it. And sorry I didn't ring last week... think you were on the call this week? Just trying to get us in a place where Fed can work with platforms to better understand the mis/dis trends so relevant agencies can try to prebunk/debunk as useful...

Not our mission but was looking to play a coord role so not every D/A is independently reaching out to platforms which could cause a lot of chaos.

Was on the call. The coordination is greatly appreciated. Was disappointed that platforms including us didn't offer more (we'll get there) and sector leadership had 0 questions.

We'll get there and that kind leadership really helps. Platforms have got to get more comfortable with gov't. It's really interesting how hesitant they remain.

Again Microsoft included.



iMessage



From: [REDACTED]@twitter.com]
Sent: 11/12/2021 10:44:29 AM
To: [REDACTED]@cdc.gov]
Subject: Re: Discuss VAERS Misinformation with a CDC expert?

Perfect - Let's keep it to Twitter for now.

And the 18th is great. Can you kindly

invite: [REDACTED]@twitter.com, [REDACTED]@twitter.com, [REDACTED]@twitter.com in addition to me?

Thanks so much,
[REDACTED]

On Fri, Nov 12, 2021 at 10:32 AM [REDACTED]@cdc.gov> wrote:

Nov 18 is best – I can send an appt using Microsoft Teams if that is OK with you.

Would you prefer we keep this Twitter only?

From: [REDACTED]@twitter.com>
Sent: Wednesday, November 10, 2021 4:07 PM
To: [REDACTED]@cdc.gov>
Subject: Re: Discuss VAERS Misinformation with a CDC expert?

Hi [REDACTED]

How would these times work for you:

Nov 17 @ 3pm ET

Nov 18 @ 1pm ET

On Mon, Nov 8, 2021 at 9:49 AM [REDACTED]@cdc.gov> wrote:

Great! We shall wait for the times.

From: [REDACTED]@twitter.com>
Sent: Monday, November 8, 2021 9:47 AM
To: [REDACTED]@cdc.gov>
Subject: Re: Discuss VAERS Misinformation with a CDC expert?

Hi [REDACTED] -

Thank you for checking in - I've shared the invitation with our team, and they are interested in taking you up on this offer! Unfortunately the time you initially shared does not work, so I have asked them to suggest a few times that would be better.

Thanks again for thinking of us!

On Mon, Nov 8, 2021 at 9:44 AM [REDACTED]@cdc.gov> wrote:

Hi [REDACTED] – Just wanted to check back on this to see if you had thoughts?

From: [REDACTED]

Sent: Friday, November 5, 2021 9:31 AM

To: [REDACTED] <[REDACTED]@twitter.com>

Subject: Discuss VAERS Misinformation with a CDC expert?

[REDACTED] – As you probably are aware, people citing CDC VAERS data incorrectly is a major source of misinformation about COVID. One of our experts on the VAERS system has already briefed another tech platform to answer some of their policy team questions. Would Twitter be interested in short 30 minute briefing & Q/A on the topic? If so, would this Wednesday at 4pm EST work? Also, how would you feel if other tech platforms were on the line? Unlike the previous BOLO meetings, we would like to open the line for exchange.

Thanks!

Example tweet:

⚠️ **#VAERS** Study performed by a statistician PhD student: vaccination death rate has risen up to 5427% after covid genetic injection, compared to all other vaccines together !!
#vaccination #COVID19

From: [REDACTED]@google.com]
Sent: 11/1/2021 9:39:05 AM
To: [REDACTED]@cdc.gov]
CC: [REDACTED]@cdc.gov]; [REDACTED]@google.com]; [REDACTED]
Subject: Re: Booster Shots

amazing, yes! 4pm EST would work better if ok with you. Thank you so much! my big boss is joining my team meeting today at 3:30pm

Thanks [REDACTED]

[REDACTED]

On Mon, Nov 1, 2021 at 9:23 AM [REDACTED]@cdc.gov> wrote:
My 4 pm was moved if you still prefer it – I can do it anytime after 4.

From: [REDACTED]@google.com>
Sent: Thursday, October 28, 2021 7:18 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@cdc.gov>; [REDACTED]@google.com>; [REDACTED]@cdc.gov>; [REDACTED]@google.com>
Subject: Re: Booster Shots

3:30pm est it is! Would you mind sending an invite so the dial in works for you? Thank you!

On Thu, Oct 28, 2021 at 7:07 PM [REDACTED]@cdc.gov> wrote:
3:30 is best. Right now we have a 4pm I must attend.

From: [REDACTED]@google.com>
Sent: Thursday, October 28, 2021 7:06 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@google.com>; [REDACTED]@google.com>; [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>
Subject: Re: Booster Shots

Thanks both for the quick response! On Monday, we can make 3:30pm est work, but anyway 4pm est is open?

[REDACTED]

Google US Federal Government Affairs and Public Policy

[REDACTED]

On Thu, Oct 28, 2021 at 5:13 PM [REDACTED] <[REDACTED]@cdc.gov> wrote:

[REDACTED] – of course not that I look again, I would recommend changing “Learn more & register at Vaccines.gov” to Find a vaccine at Vaccines.gov.

From: [REDACTED]

Sent: Thursday, October 28, 2021 5:11 PM

To: [REDACTED] <[REDACTED]@google.com>; [REDACTED] <[REDACTED]@google.com>; [REDACTED] <[REDACTED]@google.com>; [REDACTED] <[REDACTED]@cdc.gov>; [REDACTED] <[REDACTED]@cdc.gov>

Subject: RE: Booster Shots

I'm sorry this has been in my draft all day!!

This looks good. Thanks for checking.

Yes, we can discuss the pediatric vaccines early next week but let me give you some general info: ACIP is likely to vote on this on Nov 2. CDC is likely to start posting final information on Nov 3 (possibly late Nov 2), if that helps to know. There will be many updates so the changes might span over a few days. We are also looking ahead and misinformation and hope to have a BOLO type meeting later that week with platforms that are interested.

From: [REDACTED] <[REDACTED]@google.com>

Sent: Thursday, October 28, 2021 8:00 AM

To: [REDACTED] <[REDACTED]@google.com>; [REDACTED] <[REDACTED]@google.com>; [REDACTED] <[REDACTED]@cdc.gov>; [REDACTED] <[REDACTED]@cdc.gov>; [REDACTED] <[REDACTED]@cdc.gov>

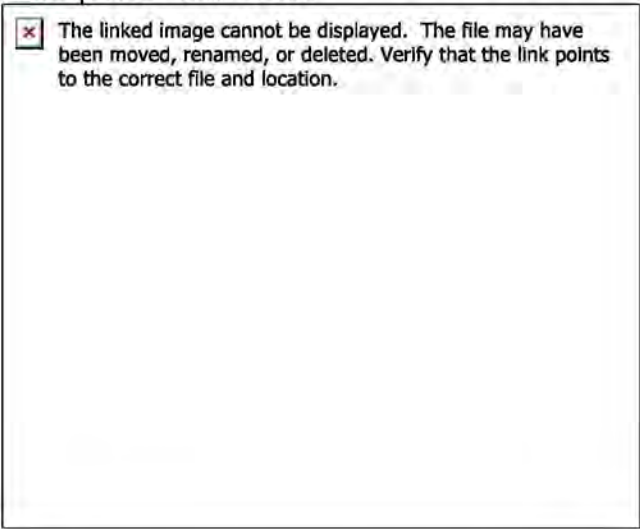
Subject: Re: Booster Shots

Hi CDC team,

██████████ OOO so I'm also adding ██████████ who is helping while he is out. Given that CDC booster [guidance](#) has changed, we wanted to raise awareness of this upcoming change to our product experience. Please see below for our new text and a mock up and let us know if you have any feedback.

Anticipated new text: "If you have been fully vaccinated with a Pfizer, Moderna or Johnson & Johnson vaccine, you may be eligible for a booster shot."

Anticipated new mock:

 The linked image cannot be displayed. The file may have been moved, renamed, or deleted. Verify that the link points to the correct file and location.

Also, do you have time to connect early next week on the anticipated guidance on vaccines for 5-11? It would be great to connect as the CDC plans communications on authoritative information for pediatric vaccines.

Thank you,
██████████ and ██████████

██████████
Google US Federal Government Affairs and Public Policy

On Thu, Sep 30, 2021 at 5:34 PM ██████████ [@google.com](#) wrote:

Great, thanks!

On Thu, Sep 30, 2021, 2:31 PM [REDACTED]@cdc.gov> wrote:

Hi [REDACTED]

I heard back from some folks. No heartburn over the message as proposed.

Cheers

[REDACTED]

From: [REDACTED]

Sent: Thursday, September 30, 2021 4:32 PM

To: [REDACTED]@google.com>

Cc: [REDACTED]@google.com>; [REDACTED]@cdc.gov>;

[REDACTED]@cdc.gov>

Subject: RE: Booster Shots

Hi [REDACTED]

I'm informally running it by some folks to see what they think. Looks inclusive and accurate enough to me, but hey, I'm a tech guy and not a vaccine SME!

Get back to you shortly

From: [REDACTED]@google.com>

Sent: Thursday, September 30, 2021 3:53 PM

To: [REDACTED]@cdc.gov>

Cc: [REDACTED]@google.com>; [REDACTED]@cdc.gov>

Subject: Booster Shots

Hi [REDACTED],

Following up on our call earlier this week to share a planned update to our vaccine general availability banner (current experience below).

As discussed, we plan to add a one liner on the latest booster shot guidance from the CDC/Vaccines.gov. Please let us know if the CDC is comfortable with the following summary sentence based on the [CDC's banner](#):

• You may be eligible for a booster shot if you received a second dose of the Pfizer COVID-19 vaccine 6+ months ago and are an adult age 65+ years, or 18+ years and at risk due to circumstances or a medical condition.

Thanks,

[REDACTED]

--

[REDACTED]@google.com

--

[REDACTED]

Google US Federal Government Affairs and Public Policy

[REDACTED]

From: [REDACTED]@google.com]
Sent: 10/28/2021 7:43:39 PM
To: [REDACTED]@cdc.gov]
Subject: Re: Booster Shots

Hi [REDACTED] I don't have specific questions. We just wanted to connect with you to confirm the link you'll be updating and to confirm key messages etc. it should be fine to keep the call small to just us.

On Thu, Oct 28, 2021 at 7:22 PM [REDACTED]@cdc.gov> wrote:

Can you give me a sense of what you'll need to discuss? I would rather not have a SME if I can answer questions but not sure what is being discussed. I know plans, key messages but not a expert in this.

From: [REDACTED]@google.com>
Sent: Thursday, October 28, 2021 7:18 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@cdc.gov>; [REDACTED]@google.com>; [REDACTED]@cdc.gov>; [REDACTED]@google.com>
Subject: Re: Booster Shots

3:30pm est it is! Would you mind sending an invite so the dial in works for you? Thank you!

On Thu, Oct 28, 2021 at 7:07 PM [REDACTED]@cdc.gov> wrote:

3:30 is best. Right now we have a 4pm I must attend. ■

From: [REDACTED]@google.com>
Sent: Thursday, October 28, 2021 7:06 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@google.com>; [REDACTED]@google.com>; [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>
Subject: Re: Booster Shots

Thanks both for the quick response! On Monday, we can make 3:30pm est work, but anyway 4pm est is open?

[REDACTED]
Google US Federal Government Affairs and Public Policy
[REDACTED]

[REDACTED]

On Thu, Oct 28, 2021 at 5:13 PM [REDACTED] <[REDACTED]@cdc.gov> wrote:

[REDACTED] – of course not that I look again, I would recommend changing “Learn more & register at Vaccines.gov” to Find a vaccine at Vaccines.gov.

From: [REDACTED]

Sent: Thursday, October 28, 2021 5:11 PM

To: [REDACTED] <[REDACTED]@google.com>; [REDACTED] <[REDACTED]@google.com>; [REDACTED]

[REDACTED] <[REDACTED]@google.com>; [REDACTED] <[REDACTED]@cdc.gov>; [REDACTED]

[REDACTED] <[REDACTED]@cdc.gov>

Subject: RE: Booster Shots

I'm sorry this has been in my draft all day!!

This looks good. Thanks for checking.

Yes, we can discuss the pediatric vaccines early next week but let me give you some general info: ACIP is likely to vote on this on Nov 2. CDC is likely to start posting final information on Nov 3 (possibly late Nov 2), if that helps to know. There will be many updates so the changes might span over a few days. We are also looking ahead and misinformation and hope to have a BOLO type meeting later that week with platforms that are interested.

From: [REDACTED] <[REDACTED]@google.com>

Sent: Thursday, October 28, 2021 8:00 AM

To: [REDACTED] <[REDACTED]@google.com>; [REDACTED] <[REDACTED]@google.com>; [REDACTED]

[REDACTED] <[REDACTED]@cdc.gov>; [REDACTED] <[REDACTED]@cdc.gov>; [REDACTED]

[REDACTED] <[REDACTED]@cdc.gov>


Subject: Re: Booster Shots

Hi CDC team,

[REDACTED] OOO so I'm also adding [REDACTED] who is helping while he is out. Given that CDC booster [guidance](#) has changed, we wanted to raise awareness of this upcoming change to our product experience. Please see below for our new text and a mock up and let us know if you have any feedback.

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Thank you,

█ and █

█
Google US Federal Government Affairs and Public Policy

On Thu, Sep 30, 2021 at 5:34 PM █ [@google.com](mailto:█@google.com) wrote:

Great, thanks!

On Thu, Sep 30, 2021, 2:31 PM █ [@cdc.gov](mailto:█@cdc.gov) wrote:

Hi █

I heard back from some folks. No heartburn over the message as proposed.

Cheers

From: [REDACTED]
Sent: Thursday, September 30, 2021 4:32 PM
To: [REDACTED]@google.com>
Cc: [REDACTED]@google.com>; [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>
Subject: RE: Booster Shots

Hi [REDACTED]

I'm informally running it by some folks to see what they think. Looks inclusive and accurate enough to me, but hey, I'm a tech guy and not a vaccine SME!

Get back to you shortly

From: [REDACTED]@google.com>
Sent: Thursday, September 30, 2021 3:53 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@google.com>; [REDACTED]@cdc.gov>
Subject: Booster Shots

Hi [REDACTED]

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As discussed, we plan to add a one liner on the latest booster shot guidance from the CDC/Vaccines.gov. Please let us know if the CDC is comfortable with the following summary sentence based on the [CDC's banner](#):

- *You may be eligible for a booster shot if you received a second dose of the Pfizer COVID-19 vaccine 6+ months ago and are an adult age 65+ years, or 18+ years and at risk due to circumstances or a medical condition.*

Thanks,

[REDACTED]

--

[REDACTED]@google.com

--

[REDACTED]
Google US Federal Government Affairs and Public Policy
[REDACTED]

[REDACTED]

[REDACTED]

Google US Federal Government Affairs and Public Policy

[REDACTED]

From: [REDACTED]@twitter.com]
Sent: 9/3/2021 10:39:37 AM
To: [REDACTED]@cdc.gov]
CC: [REDACTED]@cdc.gov]; [REDACTED]@cdc.gov]
Subject: Re: BOLO: CDC lab alert & misinformation

Thanks as always, [REDACTED]. Will share these details with our team.

On Fri, Sep 3, 2021 at 9:57 AM [REDACTED]@cdc.gov> wrote:

I'm so glad it was helpful.

Besides the CDC URLs we included originally, we've seen this URL used: [FDA Announced Today The CDC PCR Test for COVID-19 has Failed its full review. \(streetloc.com\)](#)

Hashtags were rare, but we saw #pcrtest used some.

Also, I'm out for 3 weeks, you so you may hear directly from [REDACTED], also copied here, on any other misinformation topics.

Thanks!

From: [REDACTED]@twitter.com>
Sent: Thursday, September 2, 2021 5:28 PM
To: [REDACTED]@cdc.gov>
Subject: Fwd: BOLO: CDC lab alert & misinformation

Hi [REDACTED]

Thanks for this bolo. Please see this note below from our grateful team:

----- Forwarded message -----

From: [REDACTED]
Date: Thu, Sep 2, 2021 at 5:26 PM
Subject: Re: BOLO: CDC lab alert & misinformation
To: [REDACTED]
CC: [REDACTED]

Thanks, [REDACTED].

These attached Tweets are super helpful. If there are also any URLs, or hashtags that have been reported, that would also be good for us to know.

Thanks,
[REDACTED]

On Thu, Sep 2, 2021 at 2:09 PM [REDACTED] <[REDACTED]@twitter.com> wrote:

Bolo from CDC, ICYMI

----- Forwarded message -----

From: [REDACTED] <[REDACTED]@cdc.gov>

Date: Thu, Sep 2, 2021 at 3:53 PM

Subject: BOLO: CDC lab alert & misinformation

To: [REDACTED] <[REDACTED]@twitter.com>

CC: [REDACTED] <[REDACTED]@cdc.gov>, [REDACTED]

[REDACTED] <[REDACTED]@cdc.gov>

Hi [REDACTED] –

A quick BOLO for a small but growing area of misinfo. One of our Lab alerts ([CDC 2019-Novel Coronavirus \(2019-nCoV\) Real-Time RT-PCR Diagnostic Panel](#)) was misinterpreted and was shared via social media. The CDC issued a [follow-up Laboratory Alert](#) to provide further clarification and prevent additional confusion but we are still seeing some social media circulation. The CDC 2019 Novel Coronavirus (2019-nCoV) Real-Time RT-PCR Diagnostic Panel did not fail a full review and was not revoked by the FDA. I've attached some example Twitter posts and another document with the facts around the issue.

Let us know if you have any questions!

Thanks!

[REDACTED]



From: [REDACTED]
Sent: 9/2/2021 3:53:27 PM
To: [REDACTED]@twitter.com
CC: [REDACTED]@cdc.gov; [REDACTED]@cdc.gov
Subject: BOLO: CDC lab alert & misinformation
Attachments: LOCS Twitter Examples.docx; Fact_check_for_SM_platforms.docx

Hi [REDACTED]

A quick BOLO for a small but growing area of misinfo. One of our Lab alerts ([CDC 2019-Novel Coronavirus \(2019-nCoV\) Real-Time RT-PCR Diagnostic Panel](#)) was misinterpreted and was shared via social media. The CDC issued a [follow-up Laboratory Alert](#) to provide further clarification and prevent additional confusion but we are still seeing some social media circulation. The CDC 2019 Novel Coronavirus (2019-nCoV) Real-Time RT-PCR Diagnostic Panel did not fail a full review and was not revoked by the FDA. I've attached some example Twitter posts and another document with the facts around the issue.

Let us know if you have any questions!

Thanks!



From: [REDACTED]@fb.com]
Sent: 9/1/2021 4:37:18 PM
To: [REDACTED]@cdc.gov]
CC: [REDACTED]@cdc.gov]; [REDACTED]@cdc.gov]
Subject: Re: BOLO: CDC lab alert & misinformation

Thank you [REDACTED]! Will pass to our folks.

[REDACTED]

From: [REDACTED]@cdc.gov>
Date: Wednesday, September 1, 2021 at 4:23 PM
To: [REDACTED]@fb.com>
Cc: [REDACTED]@cdc.gov>, [REDACTED]@cdc.gov>
Subject: BOLO: CDC lab alert & misinformation

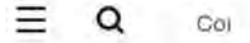
[REDACTED] – BOLO for a small but growing area of misinfo. One of our Lab alerts ([CDC 2019-Novel Coronavirus \(2019-nCoV\) Real-Time RT-PCR Diagnostic Panel](#)) was misinterpreted and was shared via social media. The CDC issued a [follow-up Laboratory Alert](#) to provide further clarification and prevent additional confusion but we are still seeing some social media circulation. The CDC 2019 Novel Coronavirus (2019-nCoV) Real-Time RT-PCR Diagnostic Panel did not fail a full review and was not revoked by the FDA. I've attached some example Facebook posts and another document with the facts around the issue.

Let us know if you have any questions!

[REDACTED]

From: [REDACTED]
Sent: 6/30/2021 7:50:15 AM
To: [REDACTED]@twitter.com]
Subject: RE: COVID Misinformation

Hi [REDACTED] – I’ve been trying to enter info but I realize I’ve been unclear on where to enter them. I went to /forms and there is a drop down on things to submit but none of them seem relevant to misinformation. Am I in the right place?



- Help
- Check accounts on
- Update accounts on
- Twitter myths
- Privacy Rules

Contact Us > [Partner Support](#)

Report any issue to get priority service

What type of problem are you having with your Twitter account? (required)

From: [REDACTED]@twitter.com>
Sent: Thursday, May 27, 2021 2:30 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@reingold.com> [REDACTED]@reingold.com>; [REDACTED]@cdc.gov>
Subject: Re: COVID Misinformation

Hi all - [REDACTED] you should now be fully. When you visit the Twitter help center logged in with your account you should see additional reporting options.

On Mon, May 24, 2021 at 3:14 PM [REDACTED]@twitter.com> wrote:

Thanks for letting me know - I've just sent a note to our team requesting an update.

On Mon, May 24, 2021 at 3:06 PM [REDACTED]@cdc.gov> wrote:

I haven't seen anything come through so far.

From: [REDACTED]@twitter.com>
Sent: Monday, May 24, 2021 2:57 PM
To: [REDACTED]@reingold.com>
Cc: [REDACTED]@cdc.gov>; [REDACTED]@reingold.com>; [REDACTED]
[REDACTED]@cdc.gov>
Subject: Re: COVID Misinformation

Hi [REDACTED] and I had a sidebar and I requested her account be enrolled. Your email reminds me that the process should have been completed by now - I'll check with on our team to make sure she's properly enrolled.

On Mon, May 24, 2021 at 2:28 PM [REDACTED]@reingold.com> wrote:

Hi [REDACTED]

I hope you had a good weekend. I'm following up about the partner support portal enrollment for CDC. Does the Twitter account need to be connected to a [cdc.gov](https://www.cdc.gov) email or is any account fine? Also, would there be any issues or complications stemming from flagging COVID misinformation on the portal using the existing [census.gov](https://www.census.gov) accounts that have access? We'll want to have at least some CDC accounts whitelisted, but that backup may be helpful in the short-term.

Let us know any next steps we can take to make sure CDC is all set with the portal.

Thanks,

[REDACTED]

Reingold

[REDACTED]

[reingold.com](https://www.reingold.com)

We're on a mission. ***Yours.***

From: [REDACTED]
Sent: Tuesday, May 11, 2021 8:50 AM
To: [REDACTED]@twitter.com>
Subject: RE: COVID Misinformation

Does it need to be the CDC account or my personal? If CDC, I'm going to have someone on staff enroll instead of me.

If personal is OK, it is: [REDACTED]

From: [REDACTED] <[REDACTED]@twitter.com>

Sent: Monday, May 10, 2021 8:51 PM

To: [REDACTED] <[REDACTED]@cdc.gov>

Cc: [REDACTED] <[REDACTED]@reingold.com>; [REDACTED] <[REDACTED]@reingold.com>; [REDACTED] <[REDACTED]@census.gov>; [REDACTED] <[REDACTED]@cdc.gov>

Subject: Re: COVID Misinformation

Hi [REDACTED] -

I'd be glad to enroll you in our Partner Support Portal, which allows you a special, expedited reporting flow in the Twitter Help Center. It worked very well with Census colleagues last year.

You need a Twitter account (and to be logged into that account) to access the Partner Support Portal. What account (or accounts) would you like me to enroll?

Best,
[REDACTED]

On Mon, May 10, 2021 at 5:05 PM [REDACTED] <[REDACTED]@cdc.gov> wrote:

[REDACTED] - I don't think we have info on how to enroll but we'd be happy to get on if you can send some info.

Thanks.

From: [REDACTED] <[REDACTED]@twitter.com>

Sent: Monday, May 10, 2021 3:02 PM

To: [REDACTED] <[REDACTED]@cdc.gov>

Cc: [REDACTED] <[REDACTED]@reingold.com>; [REDACTED] <[REDACTED]@reingold.com>; [REDACTED] <[REDACTED]@census.gov>; [REDACTED] <[REDACTED]@cdc.gov>

Subject: Re: COVID Misinformation

Hi [REDACTED] -

Thanks for sharing this - agree these are important trends to note; a quick scan shows that at least some of these have been previously reviewed and actioned. I will now ask the team to review the others.

[REDACTED] remind me: did you have a chance to enroll in our Partner Support Portal? In the future, that's the best way to get a spreadsheet like this reviewed.

Best,
[REDACTED]

On Mon, May 10, 2021 at 1:50 PM [REDACTED]@cdc.gov> wrote:

[REDACTED]

We wanted to point out two issues that we are seeing a great deal of misinfo about – vaccine shedding and microchips. The below are just some example posts. We do plan to post something shortly to address vaccine shedding and I can send that link soon. Our census team copied here, has much more info on it if needed.

Also, we are standing up a BOLO COVID misinformation meeting and inviting all tech platforms. We are shooting for 12pm EST on Friday for our first meeting. I'll include you on the invite but if you'd like to propose an alternative approach or would like to me include others, just let me know.

Thanks!

Post Text	Link
MAGNET STICKS TO AREA INJECTED BY THE VACCINE- ARE THE VACCINATED GETTING MICROCHIPPED? #justsayno	https
<p>The ex VP of Pfizer came out predicting that there will be a human depopulation of the vaccinated people in 2 years. An even shorter lifespan after the booster. He believes it's eugenics. Many scientists are corroborating this.</p> <p>I'll be alive!</p> <p>Experimental vaccines!</p>	https
THE BIG QUESTION IS WHY ARE THEY LYING...GOVERNMENTS SIGNED US AWAY TO NWO..DEPOPULATION..ALSO EXPERIMENTS IN AI..IN LAYMENS TERMS..TRYING TO TURN US INTO ROBOTS/ ANDROIDS....ALSO THEY WANT WORLD BANK OF OUR DNA .. VIA VAX	https
<p>Agreed. But if the science is being followed, there's an awful lot of evidence that the vax crowd are shedding...maybe the non-vaxxed are safer this way...thoughts</p> <p>@crislerwyo</p> <p>?</p>	https
COVID 'Vaccine Shedding', Evidence SARS-CoV-2 Spike Protein Can 'Alter Human Genes' & VAERS Truth	https
Thank Bill Gates for wanting depopulation. That's exactly what this vaccine is doing, and will continue to do over the next few years.	https
IM ALARMED BY THE AMOUNT OF WOMEN IN MY DM'S COMPLAINING ABOUT ABNORMAL BLEEDING AND MISCARRIAGES AFTER COMING IN CONTACT WITH SOMEONE WHOSE BEEN VACCINATED!!!!	https
Well hundreds of women on this page say they are having bleeding/ clotting after vaccination or that they bleed oddly being AROUND vaccinated women. Unconfirmed, needs more investigation. But lots of reports. COVID-19 Vaccine Side Effects	https

<p>[Links to: https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/]</p>	<p>https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/</p>
<p>So the #CDC now says that those who are "Fully Vaxed nated" can "Go outside & live freely" lol.. This is a joke .</p> <p>Quick questions for those who were experimented on I MEAN -Took the shot, what were the ingredients in it? You did ASK right? .. Also, do you know what SHEDDING is?</p>	<p>https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/</p>
<p>Here is the official Pfizer trail protocols Concerning shedding by the vaccinated Fertility (male and female) contraception to be compulsorily used because shedding Adverse events and serious adverse events reporting And much more Dangers ore known</p> <p>https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf</p>	<p>https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/</p>
<p>For those of you who have questions about Spiked Protein SHEDDING: Pfizer admits in its own mRNA vaxx trial documentation that non-vaxxed people can be ENVIRONMENTALLY EXPOSED to the shot's spike proteins by INHALATION or SKIN CONTACT.</p> <p>https://themostrbeautifulworld.com/blog/skin-contact-covid</p>	<p>https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/</p>
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CAUTION: This message originated externally. Please use caution when clicking on links or opening attachments.

From: [REDACTED]
Sent: 6/10/2021 7:12:04 AM
To: [REDACTED]@twitter.com]
Subject: RE: CDC COVID-19 BOLO Meeting

Thanks for letting us know.

From: [REDACTED]@twitter.com>
Sent: Wednesday, June 9, 2021 7:54 PM
To: [REDACTED]@cdc.gov>
Subject: Re: CDC COVID-19 BOLO Meeting

I will be on vacation next week, but I will see if another colleague from Twitter can join.

Best.

[REDACTED]

On Wed, Jun 9, 2021 at 4:23 PM [REDACTED]@cdc.gov> wrote:

We would like to invite digital platforms to attend our 3rd short "Be On The Lookout" meeting on COVID. Let us know if you have questions and feel free to forward this message to anyone in your organization that should attend.

Join ZoomGov Meeting

[REDACTED]

[REDACTED]

Passcode: [REDACTED]

One tap mobile

[REDACTED]

Dial by your location

[REDACTED]

Meeting ID: [REDACTED]

Passcode [REDACTED]

Find your local number [REDACTED]

Join by SIP

[REDACTED]@sip.zoomgov.com



From: [REDACTED]@reingold.com]
Sent: 5/24/2021 2:28:00 PM
To: [REDACTED]@twitter.com
CC: [REDACTED]@cdc.gov]; [REDACTED]@reingold.com]; [REDACTED]@cdc.gov]
Subject: RE: COVID Misinformation

Hi [REDACTED],

I hope you had a good weekend. I'm following up about the partner support portal enrollment for CDC. Does the Twitter account need to be connected to a cdc.gov email or is any account fine? Also, would there be any issues or complications stemming from flagging COVID misinformation on the portal using the existing census.gov accounts that have access? We'll want to have at least some CDC accounts whitelisted, but that backup may be helpful in the short-term.

Let us know any next steps we can take to make sure CDC is all set with the portal.

Thanks,

[REDACTED]
Reingold
[REDACTED]

reingold.com

We're on a mission. **Yours.**

From: [REDACTED] (CDC/OD/OADC)
Sent: Tuesday, May 11, 2021 8:50 AM
To: [REDACTED]@twitter.com>
Subject: RE: COVID Misinformation

Does it need to be the CDC account or my personal? If CDC, I'm going to have someone on staff enroll instead of me.

If personal is OK, it is: @ [REDACTED]

From: [REDACTED]@twitter.com>
Sent: Monday, May 10, 2021 8:51 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@reingold.com>; [REDACTED]@reingold.com>; [REDACTED]@census.gov>; [REDACTED]@cdc.gov>
Subject: Re: COVID Misinformation

Hi [REDACTED],

I'd be glad to enroll you in our Partner Support Portal, which allows you a special, expedited reporting flow in the Twitter Help Center. It worked very well with Census colleagues last year.

You need a Twitter account (and to be logged into that account) to access the Partner Support Portal. What account (or accounts) would you like me to enroll?

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On Mon, May 10, 2021 at 5:05 PM [REDACTED]@cdc.gov> wrote:

[REDACTED] - I don't think we have info on how to enroll but we'd be happy to get on if you can send some info.

Thanks.

From: [REDACTED]@twitter.com>

Sent: Monday, May 10, 2021 3:02 PM

To: [REDACTED]@cdc.gov>

Cc: [REDACTED]@reingold.com>; [REDACTED]@reingold.com> [REDACTED]

[REDACTED]@census.gov>; [REDACTED]@cdc.gov>

Subject: Re: COVID Misinformation

H [REDACTED] -

Thanks for sharing this - agree these are important trends to note; a quick scan shows that at least some of these have been previously reviewed and actioned. I will now ask the team to review the others.

[REDACTED] remind me: did you have a chance to enroll in our Partner Support Portal? In the future, that's the best way to get a spreadsheet like this reviewed.

Best.

On Mon, May 10, 2021 at 1:50 PM [REDACTED]@cdc.gov> wrote:

[REDACTED] -

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Thanks!

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<p>The ex VP of Pfizer came out predicting that there will be a human depopulation of the vaccinated people in 2 years. An even shorter lifespan after the booster. He believes it's eugenics. Many scientists are corroborating this.</p> <p>I'll be alive!</p> <p>Experimental vaccines!</p>	<p>https://t</p>
<p>THE BIG QUESTION IS WHY ARE THEY LYING...GOVERNMENTS SIGNED US AWAY TO NWO..DEPOPULATION..ALSO EXPERIMENTS IN AI..IN LAYMENS TERMS..TRYING TO TURN US INTO ROBOTS/ ANDROIDS....ALSO THEY WANT WORLD BANK OF OUR DNA .. VIA VAX</p>	<p>https://t</p>
<p>Agreed. But if the science is being followed, there's an awful lot of evidence that the vax crowd are shedding...maybe the non-vaxxed are safer this way...thoughts</p> <p>@crislerwyo</p> <p>?</p>	<p>https://t</p>
<p>COVID 'Vaccine Shedding', Evidence SARS-CoV-2 Spike Protein Can 'Alter Human Genes' & VAERSTruth</p>	<p>https://t</p>
<p>Thank Bill Gates for wanting depopulation. That's exactly what this vaccine is doing, and will continue to do over the next few years.</p>	<p>https://t</p>
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<p>Here is the official Pfizer trail protocols Concerning shedding by the vaccinated Fertility (male and female) contraception to be compulsorily used because shedding Adverse events and serious adverse events reporting And much more Dangers ore known</p>	<p>https://t</p>

<p>https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf</p>	
<p>For those of you who have questions about Spiked Protein SHEDDING: Pfizer admits in its own mRNA vaxx trial documentation that non-vaxxed people can be ENVIRONMENTALLY EXPOSED to the shot's spike proteins by INHALATION or SKIN CONTACT.</p> <p>https://themostrbeautifulworld.com/blog/skin-contact-covid</p>	<p>https://t</p>
<p>Pfizer acknowledges the existence of "SHEDDING" in their #mRNA vaccines, and is setting up this new trial to study these dangers.</p> <p>(Shedding is where unvaccinated people experience serious health issues just by being near to vaccinated people).</p> <p>https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf#page67</p>	<p>https://t</p>



CAUTION: This message originated externally. Please use caution when clicking on links or opening attachments.

From: [REDACTED] [google.com]
Sent: 5/11/2021 3:57:52 PM
To: [REDACTED]@cdc.gov]
CC: [REDACTED] [google.com]
Subject: Re: COVID 19 BOLO Meeting

Thank you [REDACTED] look forward to it!

On Tue, May 11, 2021 at 3:55 PM [REDACTED] <[REDACTED]@cdc.gov> wrote:

Great – I was going to ask about [REDACTED] at 4. ☺

From: [REDACTED] [google.com]>
Sent: Tuesday, May 11, 2021 3:51 PM
To: [REDACTED] <[REDACTED]@cdc.gov>; [REDACTED] [google.com]>
Subject: Re: COVID 19 BOLO Meeting

Hi [REDACTED] Could you please add [REDACTED] from our YouTube team to the call below? Thank you!

On Tue, May 11, 2021 at 3:25 PM [REDACTED] <[REDACTED]@cdc.gov> wrote:

We would like to invite digital platforms to attend a short “Be On The Lookout” meeting on COVID. Let us know if you have questions and feel free to forward this message to anyone in your organization that should attend.

Thank you.



From: [redacted]@twitter.com]
Sent: 5/11/2021 9:27:53 AM
To: [redacted]@cdc.gov]
Subject: Re: COVID Misinformation

Your account works fine. I'll proceed with processing your enrollment.

On Tue, May 11, 2021 at 8:50 AM [redacted]@cdc.gov> wrote:

Does it need to be the CDC account or my personal? If CDC, I'm going to have someone on staff enroll instead of me.

If personal is OK, it is: [redacted]

From: [redacted]@twitter.com>

Sent: Monday, May 10, 2021 8:51 PM

To: [redacted]@cdc.gov>

Cc: [redacted]@reingold.com>; [redacted]@cdc.gov>

[redacted]@census.gov>; [redacted] (C)

[redacted]@cdc.gov>

Subject: Re: COVID Misinformation

Hi [redacted]

I'd be glad to enroll you in our Partner Support Portal, which allows you a special, expedited reporting flow in the Twitter Help Center. It worked very well with Census colleagues last year.

You need a Twitter account (and to be logged into that account) to access the Partner Support Portal. What account (or accounts) would you like me to enroll?

Best,

On Mon, May 10, 2021 at 5:05 PM [redacted]@cdc.gov> wrote:

[redacted] - I don't think we have info on how to enroll but we'd be happy to get on if you can send some info.

Thanks.

From: [redacted]@twitter.com>

Sent: Monday, May 10, 2021 3:02 PM

To: [redacted]@cdc.gov>

Cc: [redacted]@reingold.com>; [redacted]@reingold.com>; [redacted]

[redacted]@census.gov>; [redacted]

[redacted] cdc.gov>

Subject: Re: COVID Misinformation

Hi [redacted]

Thanks for sharing this - agree these are important trends to note; a quick scan shows that at least some of these have been previously reviewed and actioned. I will now ask the team to review the others.

[redacted] remind me: did you have a chance to enroll in our Partner Support Portal? In the future, that's the best way to get a spreadsheet like this reviewed.

Best.

[redacted]

On Mon, May 10, 2021 at 1:50 PM [redacted] @cdc.gov> wrote:

[redacted]

We wanted to point out two issues that we are seeing a great deal of misinfo about – vaccine shedding and microchips. The below are just some example posts. We do plan to post something shortly to address vaccine shedding and I can send that link soon. Our census team copied here, has much more info on it if needed.

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Thanks!

Post Text

MAGNET STICKS TO AREA INJECTED BY THE VACCINE- ARE THE VACCINATED GETTING MICROCHIPPED? #justsayno

The ex VP of Pfizer came out predicting that there will be a human depopulation of the vaccinated people in 2 years. An even shorter lifespan after the booster. He believes it's eugenics. Many scientists are corroborating this.

I'll be alive!

⊙Experimental vaccines!

THE BIG QUESTION IS WHY ARE THEY LYING...GOVERNMENTS SIGNED US AWAY TO NWO..DEPOPULATION..ALSO EXPERIMENTS IN AL.IN LAYMENS TERMS..TRYING TO TURN US INTO ROBOTS/ ANDROIDS....ALSO THEY WANT WORLD BANK OF OUR DNA .. VIA VAX

Agreed. But if the science is being followed, there's an awful lot of evidence that the vax crowd are shedding...maybe the non-vaxxed are safer this way...thoughts

@crislerwyo

?

COVID 'Vaccine Shedding', Evidence SARS-CoV-2 Spike Protein Can 'Alter Human Genes' & VAERS Truth

Thank Bill Gates for wanting depopulation. That's exactly what this vaccine is doing, and will continue to do over the next few years.

IM ALARMED BY THE AMOUNT OF WOMEN IN MY DM'S COMPLAINING ABOUT ABNORMAL BLEEDING AND MISCARRIAGES AFTER COMING IN CONTACT WITH SOMEONE WHOSE BEEN VACCINATED!!!!

Well hundreds of women on this page say they are having bleeding/ clotting after vaccination or that they bleed oddly being AROUND vaccinated women. Unconfirmed, needs more investigation. But lots of reports. COVID-19 Vaccine Side Effects

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Quick questions for those who were experimented on I MEAN-Took the shot, what were the ingredients in it? You did ASK right? .. Also, do you know what SHEDDING is?

Here is the official Pfizer trial protocols
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contraception to be compulsorily used because shedding
Adverse events and serious adverse events reporting
And much more
Dangers ore known

https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf

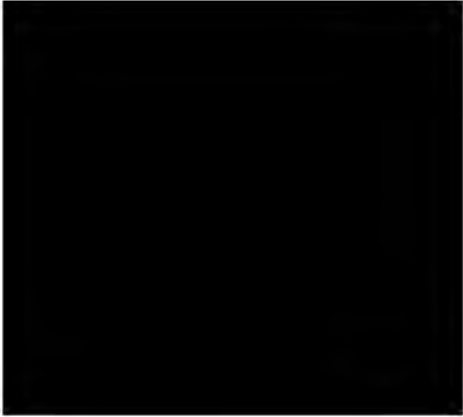
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Pfizer acknowledges the existence of "SHEDDING" in their mRNA vaccines, and is setting up this new trial to study these dangers.

(Shedding is where unvaccinated people experience serious health issues just by being near to vaccinated people).

https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf#page67



From: [REDACTED] (CDC/OD/OADC) [REDACTED]
Sent: 5/10/2021 12:44:41 PM
To: [REDACTED]@fb.com]; [REDACTED]@fb.com]
Subject: COVID BOLO Misinformation meetings

We would like to establish COVID BOLO meetings on misinformation and invite all platforms to join the meetings. We are aiming for our first one on Friday at noon. I know you were considering possible process on your end, but we wanted start here just as interim first step. Are there direct POCs on your end I should include on the invite? Happy to chat if better.

THANKS!

From: [REDACTED] (CDC/OD/OADC) [REDACTED]
Sent: 5/10/2021 12:42:50 PM
To: [REDACTED]@google.com]; [REDACTED]@google.com]
Subject: COVID BOLO meetings on misinformation

We would like to establish COVID BOLO meetings on misinformation and invite all platforms to join the meetings. We are aiming for our first one on Friday at noon. We have heard through the grapevine that [REDACTED] at YouTube would want to join. Are there other POCs on your end I should include on the invite?

From: [REDACTED] (CDC/OD/OADC) [REDACTED]
Sent: 6/29/2022 6:01:54 PM
To: [REDACTED] [REDACTED]@google.com]; [REDACTED] (CDC/OD/OADC) [REDACTED]@cdc.gov]; [REDACTED]@google.com]
Subject: RE: Claims review

I'll check on this but I think I'll probably end up needing to refer you to another agency. I'll get back to you.

From: [REDACTED]@google.com>
Sent: Wednesday, June 29, 2022 4:38 PM
To: [REDACTED] (CDC/OD/OADC) <[REDACTED]@cdc.gov>; [REDACTED] (CDC/OD/OADC) <[REDACTED]@cdc.gov>; [REDACTED]@google.com>
Subject: Claims review


Hi [REDACTED],

The YouTube Policy team is requesting evidence-based input on the claims below. In the past, the CDC has reviewed COVID information claims and commented TRUE or FALSE + add any additional context needed.

- CLAIM:** High doses of progesterone is a **safe** method of reversing chemical abortion (mifepristone & misoprostol)
- CLAIM:** High doses of progesterone is an **effective** method of reversing chemical abortion (mifepristone & misoprostol)

Please let me know if you have any questions or concerns.

Thanks, [REDACTED]

 The linked...



From: [REDACTED]@fb.com]
Sent: 6/19/2022 1:41:02 PM
To: [REDACTED] (CDC/DDID/NCIRD/OD) [REDACTED]@cdc.gov]
CC: [REDACTED] (CDC/OD/OADC) [REDACTED]@cdc.gov; [REDACTED]@fb.com]; [REDACTED] (CDC/OD/OADC) [REDACTED]@cdc.gov]
Subject: Re: Misinformation Claims for 5 year olds and younger

Wonderful thank you!

[REDACTED]
Meta | politics & government

[REDACTED]@fb.com

On Jun 19, 2022, at 11:40 AM, [REDACTED] (CDC/DDID/NCIRD/OD) <[REDACTED]@cdc.gov> wrote:

Hello [REDACTED]

Here are responses to these claims. Please let me know what other information I can provide.

Thanks. [REDACTED]

Claims that COVID-19 vaccines are ineffective for children ages 6 months to 4 years are false and belief in such claims could lead to back vaccine hesitancy.

COVID-19 vaccines available in the United States are effective at protecting people, including children ages 6 months to 4 years, from getting seriously ill, being hospitalized, and even dying.

Children who get COVID-19 can get very sick, can require treatment in a hospital, and in rare situations, can even die. After getting COVID-19, children and teens can also experience a wide range of new, returning, or ongoing health problems. [Getting eligible children vaccinated](#) can help prevent them from getting really sick even if they do get infected and help prevent serious short- and long-term complications of COVID-19.

Getting a COVID-19 vaccine is a safer, more reliable way to build protection than getting sick with COVID-19. The known risks of COVID-19 and possible severe complications—such as long-term health problems, hospitalization, and even death—outweigh the potential risks of having a rare, adverse reaction to vaccination. The benefit of COVID-19 vaccines, like other vaccines, is that those who get vaccinated get protection without risking the potentially serious consequences of getting sick with COVID-19.

Claims that COVID-19 vaccines kill or seriously harm people leading to any of the following harmful side effects: Meningitis, Syphilis, Encephalitis (e.g., Japanese encephalitis), Monkeypox or Hepatitis are false and belief in these claims could lead to vaccine hesitancy.

Before authorizing or approving COVID-19 vaccines, scientists conducted clinical trials with thousands of children and teens to establish their safety and effectiveness.

- Through continued safety monitoring, COVID-19 vaccination has been found to be safe for children and teens.
- The known risks and possible severe complications of COVID-19 outweigh the potential risks of having [a rare, adverse reaction to vaccination](#).

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From [REDACTED]@fb.com>

Sent: Sunday, June 19, 2022 10:57:06 AM

To: [REDACTED] (CDC/DDID/NCIRD/OD) <[REDACTED]@cdc.gov>

Cc: [REDACTED] (CDC/OD/OADC) <[REDACTED]@cdc.gov> [REDACTED]@fb.com> [REDACTED]

(CDC/OD/OADC) <[REDACTED]@cdc.gov>

Subject: Re: Misinformation Claims for 5 year olds and younger

Hello All! Such exciting news about the vaccine approval — let us know if you need anything else about the below claims. We are hoping to move on these quickly. Thank you!

[REDACTED]
Meta | politics & government

[REDACTED]@fb.com

On Jun 7, 2022, at 9:53 AM, [REDACTED] (CDC/DDID/NCIRD/OD) <[REDACTED]@cdc.gov> wrote:

Hi all:

[CDC's ACIP will meet June 17 & 18](#) to discuss the expected EUAs for the 6mos-5 years COVID-19 vaccines.

If we can provide a response to this request after the FDA and CDC advisory committees have completed their work, we can provide a more complete answer.

Please let me know if that timeline is OK.

Thanks [REDACTED]

COVID-19 Emergency Response

[REDACTED] p: [REDACTED] cdc.gov

[REDACTED] @cdc.gov

From: [REDACTED] (CDC/OD/OADC) <[REDACTED]@cdc.gov>

Sent: Monday, June 6, 2022 9:29 AM

To: [REDACTED]@fb.com>

Cc: [REDACTED]@fb.com>; [REDACTED] (CDC/OD/OADC) <[REDACTED]@cdc.gov>; [REDACTED]

[REDACTED] (CDC/DDID/NCIRD/OD) <[REDACTED]@cdc.gov>

Subject: RE: Misinformation Claims for 5 year olds and younger

+ Rosie who gathered the last set and can best help on this one too.

Thanks!

From: [REDACTED]@fb.com>

Sent: Friday, June 3, 2022 12:37 PM

To: [REDACTED] (CDC/OD/OADC) <[REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>; [REDACTED] (CDC/OD/OADC) <[REDACTED]@cdc.gov>

Subject: Misinformation Claims for 5 year olds and younger

Hi [REDACTED]

Thanks so much again for your help debunking claims about COVID vaccines and children. We have been following media reports that the FDA will hold a VRBPAC meeting on June 15 to discuss authorization of the Pfizer and Moderna COVID vaccines for young children, and so wanted to reach out to make sure we had the most current information.

I have a few questions around specific claims we currently remove because they are false and harmful and whether these are also false and harmful when in reference specifically to young children (i.e., 5 and younger). Getting your team's insight around this will help ensure we are able to remove these when we see them on the platform as soon as possible after any FDA authorization. In April you were able to debunk all the claims we were removing for 6-12 year olds except one; since then, we've also added or may soon add a few new claims. As such, could you please let us know whether the CDC is able to debunk the following as false and harmful for young children?

- Claims that COVID-19 vaccines are not effective in preventing severe illness or death from COVID-19 (see Common Questions below for how we define the term "effective")
- Claims that COVID-19 vaccines kill or seriously harm people, which we define as leading to any of the following harmful side effects:
 - Meningitis
 - Syphilis
 - Encephalitis (e.g., Japanese encephalitis)
 - Monkeypox
 - Hepatitis

Many thanks as always for your help, [REDACTED]

Best,

[Redacted]



[Redacted]

[Meta](#)

From: [REDACTED]@fb.com]
Sent: 6/7/2022 10:38:34 AM
To: [REDACTED] (CDC/DDID/NCIRD/OD) [REDACTED]@cdc.gov]; [REDACTED] (CDC/OD/OADC) [REDACTED]@cdc.gov]; [REDACTED]@fb.com]
CC: [REDACTED] (CDC/OD/OADC) [REDACTED]@cdc.gov]; [REDACTED]@fb.com]
Subject: Re: Misinformation Claims for 5 year olds and younger

Thanks so much, [REDACTED]
 Adding my colleague [REDACTED] as well.

We'll hold on our policy changes until we get the final word from you.

From: [REDACTED] (CDC/DDID/NCIRD/OD) [REDACTED]@cdc.gov>
Date: Tuesday, June 7, 2022 at 9:53 AM
To: [REDACTED] (CDC/OD/OADC) <[REDACTED]@cdc.gov>, [REDACTED]>
Cc: [REDACTED]@fb.com>, [REDACTED] (CDC/OD/OADC) [REDACTED]@cdc.gov>
Subject: RE: Misinformation Claims for 5 year olds and younger

Hi all:

[CDC's ACIP will meet June 17 & 18](#) to discuss the expected EUAs for the 6mos-5 years COVID-19 vaccines.

If we can provide a response to this request after the FDA and CDC advisory committees have completed their work, we can provide a more complete answer.

Please let me know if that timeline is OK.

Thanks. [REDACTED]

COVID-19 Emergency Response
 [REDACTED]

From: [REDACTED] (CDC/OD/OADC) <[REDACTED]@cdc.gov>
Sent: Monday, June 6, 2022 9:29 AM
To: [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com> [REDACTED] (CDC/OD/OADC) [REDACTED]@cdc.gov>; [REDACTED] (CDC/DDID/NCIRD/OD) <[REDACTED]@cdc.gov>
Subject: RE: Misinformation Claims for 5 year olds and younger

+ [REDACTED] who gathered the last set and can best help on this one too.

Thanks!

From: [REDACTED]@fb.com>

Sent: Friday, June 3, 2022 12:37 PM

To: [REDACTED] (CDC/OD/OADC) <[REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>; [REDACTED] (CDC/OD/OADC) <[REDACTED]@cdc.gov>

Subject: Misinformation Claims for 5 year olds and younger

Hi [REDACTED]

Thanks so much again for your help debunking claims about COVID vaccines and children. We have been following media reports that the FDA will hold a VRBPAC meeting on June 15 to discuss authorization of the Pfizer and Moderna COVID vaccines for young children, and so wanted to reach out to make sure we had the most current information.

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- Claims that COVID-19 vaccines are not effective in preventing severe illness or death from COVID-19 (see Common Questions below for how we define the term "effective")
- Claims that COVID-19 vaccines kill or seriously harm people, which we define as leading to any of the following harmful side effects:
 - Meningitis
 - Syphilis
 - Encephalitis (e.g., Japanese encephalitis)
 - Monkeypox
 - Hepatitis

Many thanks as always for your help, [REDACTED]!

Best,

[REDACTED]

 Meta

[REDACTED]

[Meta](#)

From: [REDACTED]@fb.com]
Sent: 6/1/2022 12:39:32 PM
To: [REDACTED]@cdc.gov]; [REDACTED]
[REDACTED]@cdc.gov]; [REDACTED]@cdc.gov]
CC: [REDACTED]@fb.com]; CDC IMS 2019 NCOV Response VCU Communications
[REDACTED]@cdc.gov]
Subject: Re: Follow up Misiinformation Claims about Under 5 Year Olds

Great, thank you so much [REDACTED] —hugely helpful!

From: [REDACTED] <[REDACTED]@cdc.gov>
Date: Wednesday, June 1, 2022 at 7:23 AM
To: [REDACTED]@cdc.gov> [REDACTED]@fb.com>, [REDACTED]
[REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>, CDC IMS 2019 NCOV Response VCU Communications
<[REDACTED]@cdc.gov>
Subject: RE: Follow up Misinformation Claims about Under 5 Year Olds

Hello [REDACTED]:

Below is a response to the claim: The COVID vaccine causes hepatitis for ages 6 months and older.

COVID-19 vaccines are available and recommended for everyone ages 5 years and older; there are not yet vaccines authorized for children under 5 years. It is false that the COVID vaccine causes hepatitis although CDC is currently working with health departments across the country to [identify children with hepatitis of unknown cause](#). Investigators are examining a possible relationship to adenovirus type 41 infection, and some other causes have been ruled out. It is not yet clear whether there has been an increase in the number of cases of hepatitis in children, or improvements in detecting cases. It is not unusual for the cause of some hepatitis cases in children to remain unknown.

Belief that the COVID-19 vaccine causes hepatitis contributes to the risk of individuals refusing COVID-19 vaccines.

Please let me know what questions you have.

Thanks. [REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]@cdc.gov>
 Sent: Friday, May 27, 2022 9:41 AM
 To: [REDACTED]@fb.com>; [REDACTED]@cdc.gov>
 Cc: [REDACTED]@fb.com>; [REDACTED]@cdc.gov>
 Subject: RE: Follow up Misiinformation Claims about Under 5 Year Olds

[REDACTED] is out until next week. I know she'll check when she returns.

From: [REDACTED]@fb.com>
 Sent: Thursday, May 26, 2022 2:08 AM
 To: [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>
 Cc: [REDACTED]@fb.com>; [REDACTED]@cdc.gov>
 Subject: Re: Follow up Misiinformation Claims about Under 5 Year Olds

Hi [REDACTED], I wanted to follow up on whether you had more information about the below claim?

Many thanks,
 [REDACTED]

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From: [REDACTED]@cdc.gov>
 Sent: Tuesday, May 3, 2022 10:41 PM
 To: [REDACTED]@fb.com>; [REDACTED]@cdc.gov>
 Cc: [REDACTED]@fb.com>; [REDACTED]@cdc.gov>
 Subject: RE: Follow up Misiinformation Claims about Under 5 Year Olds

+ [REDACTED] to weigh in.

From: [REDACTED]@fb.com>
 Sent: Tuesday, May 3, 2022 4:32 PM
 To: [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>
 Cc: [REDACTED]@fb.com>
 Subject: Re: Follow up Misiinformation Claims about Under 5 Year Olds

Hi [REDACTED],

We've recently become aware of another claim about side effects of the COVID vaccine for under 5-year old's that we believe might be currently trending, and so were hoping your team might be able to look into debunking this one as well. We'll then action on it appropriately along with the other claims you most recently debunked for us.

- **Claim: The COVID vaccine causes hepatitis**
- Is this false (for ages 6 months and older) and
- Is this likely to directly contribute to the risk of imminent physical harm (including by contributing to the risk of individuals getting or spreading a harmful disease or refusing an associated vaccine)?

Many thanks and all the best,

From: [REDACTED]@fb.com>

Date: Thursday, April 7, 2022 at 10:40 AM

To: [REDACTED] <[REDACTED]@cdc.gov>, [REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>

Subject: Re: Follow up Misinformation Claims about Under 5 Year Olds

Wow, this is amazing, thank you so much [REDACTED]!! We'll get moving now to be able to remove all but that one claim as soon as the announcement and authorization happens. And we can check in closeto regarding this last claim below.

Thank you so much again, I can't reiterate enough how helpful this is for us to remove these misinfo claims ASAP.

Best,

From: [REDACTED] <[REDACTED]@cdc.gov>

Date: Thursday, April 7, 2022 at 10:21 AM

To: [REDACTED]@fb.com>, [REDACTED] <[REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>

Subject: RE: Follow up Misinformation Claims about Under 5 Year Olds

Hi [REDACTED]— Ended up getting an answer without my POC.

All the claims below are false EXCEPT the note directly below. Also, it is reasonable to assume these statements may lead to vaccine refusal:

- o Claims that COVID-19 vaccines are not effective in preventing severe illness or death from COVID-19 (see Common Questions below for how we define the term "effective") CDC can't speak to this until the pharmaceutical companies have reported data on vaccine efficacy against severe illness or death in the <5 year olds.

From: [REDACTED]@fb.com>

Sent: Monday, April 4, 2022 4:56 PM

To: [REDACTED] (CDC/OD/OADC) <[REDACTED]@cdc.gov>; [REDACTED] <[REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>

Subject: Re: Follow up Misinformation Claims about Under 5 Year Olds

Hi [REDACTED] hope you're well! I wanted to follow up on my previous email given the reports last week that Moderna is going to seek emergency authorization of its COVID vaccine for children under 6, and that Pfizer's updated efficacy data for children vaccines will be available in early April.

Our interpretation is that we now might be a few weeks out from the CDC authorizing one or both vaccines for children, and so I wanted to follow up about the below misinformation claims pertaining to Covid-19 vaccines and children. Would it be possible to let us know which of the below listed claims (plus 2 new ones, indicated in red) have been debunked by the CDC so we can remove the appropriate ones as close as possible to authorization taking place?

As always, happy to set up time to talk through if easier—just let me know!

Many thanks and all the best,

From: [REDACTED] <[REDACTED]@cdc.gov>
Date: Monday, February 14, 2022 at 7:17 AM
To: [REDACTED]@fb.com>
Cc: [REDACTED] <[REDACTED]@cdc.gov>
Subject: RE: Follow up Misinformation Claims about Under 5 Year Olds

Thanks [REDACTED] I'll route this through our team here and see what we can do.

From: [REDACTED]@fb.com>
Sent: Friday, February 11, 2022 7:00 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@cdc.gov>
Subject: Follow up Misinformation Claims about Under 5 Year Olds

Hi [REDACTED],

Thank you so much again for gathering the team to meet with us earlier this week, it was incredibly helpful. Your partnership is critical to us in making sure we can remove false and harmful claims about COVID-19 and vaccines on our platform.

In follow up to our meeting, I am sharing below the long list of claims that we currently remove related to the COVID vaccine because public health authorities such as the CDC have confirmed they are false and could contribute to imminent physical harm if believed. In the fall, your team was able to confirm these claims were also false and harmful specifically as applied to 5-11 year-olds ahead of the FDA's emergency authorization of the Pfizer vaccine for that age group. As a result, we were able to immediately remove content that claimed, for instance, that the COVID vaccine would give children cancer when the FDA made its announcement.

We are hoping CDC could confirm whether these claims are also false and harmful when referring to children between 6 months and 5 years old. We understand some of these may depend on your review of the FDA's report, and also that Pfizer's FDA request has been postponed. Our hope though is that we are able to receive as many confirmed debunkings from your team ahead of the FDA's announcement so that we can immediately begin removing this harmful content when the news hits.

Please let me know if you have any questions, if sharing these in another format would be more helpful for, or if there is any further context I can provide.

We know how very busy you all are so thank you so much again in advance for your help here!

Best,

For each of the following claims, can you please indicate if the claim is 1) false and 2) if believed, could contribute to vaccine refusals?

- **Claims about the availability or existence of COVID-19 vaccines, specifically:**
 - Claims that COVID-19 vaccines do not exist or have not been approved
 - Claims that COVID-19 vaccines are not approved by the FDA if that content also suggests the vaccines are unsafe, ineffective at preventing severe illness or death, experimental, or

have not been appropriately tested. Otherwise, we will allow claims that the FDA has not approved a COVID-19 vaccine, other than the Pfizer/BioNTech or Moderna vaccine, or make a clear distinction between a full FDA approval and an Emergency Use Authorization with appropriate context such as distinguishing between different types of COVID vaccines.

- Claims that COVID-19 vaccines are experimental, if the context of the claim also suggests that vaccinated people are taking part in a medical experiment.
- **Claims about the safety or serious side effects of COVID-19 vaccines, including:**
 - Claims that COVID-19 vaccines kill or seriously harm people, which we define as leading to any of the following harmful side effects:
 - Death
 - Amyotrophic Lateral Sclerosis (ALS)
 - Multiple sclerosis
 - COVID-19 or a new COVID-19 strain
 - Autism
 - Miscarriages
 - Infertility or sterilization
 - Birth defects
 - Shedding
 - Altering DNA
 - Blood clots (except in relation to specific vaccines for which public health authorities have found possible links or are officially investigating such reports)
 - Alzheimer's
 - Prion's disease
 - Bell's palsy
 - Erectile dysfunctions
 - Cancer
 - Diabetes
 - Autoimmune diseases
 - Antibody-dependent enhancement
 - Weakened immune system
 - Acquired immunodeficiency syndrome (AIDS) or human immunodeficiency virus (HIV)
 - Heart attacks (does not apply to claims of myocarditis or other heart conditions)
 - Multisystem inflammatory syndrome in children (MIS-C)
 - Magnetism
 - Other side-effects which are impossible or irrational, such as taking the vaccine turns you into a monkey (requires additional information and/or context), or gives you "vaccine acquired immune deficiency syndrome," which is not recognized as a disease or condition.
 - Claims that the spike proteins created by the COVID-19 vaccines are dangerous / cytotoxic.
 - Claims that building immunity by getting COVID-19 is safer than getting the vaccine
 - Claims that COVID-19 vaccines are unsafe generally, or for a certain specific group of people, if that group is identified based on protected characteristics or other identifiers not directly related to their personal health, age, or disabilities (e.g. social status, religion, or political views), or that vaccines are unsafe for menstruating women.
 - Claims that being near vaccinated people causes adverse effects on unvaccinated people
 - Claims that breast milk from vaccinated people is harmful to babies/children
- **Claims about the efficacy of COVID-19 vaccines, including:**
 - Claims that COVID-19 vaccines are not effective in preventing severe illness or death from COVID-19 (see Common Questions below for how we define the term "effective")
 - Claims that people who are vaccinated are more at risk for getting sick with COVID than people who are unvaccinated
- **Claims about how the COVID-19 vaccine was developed or its ingredients, including:**
 - Claims that COVID-19 vaccines contain toxic, prohibited, or harmful ingredients, microchips, animal products, or anything not on the vaccine ingredient list
 - Claims that COVID-19 vaccines are untested

- Claims that COVID-19 vaccines contain the mark of the beast
- Claims that people died as a result of the COVID-19 Pfizer/BioNTech vaccine during clinical trials (Note - We allow claims that people died during the COVID-19 Pfizer/BioNTech clinical trials) (requires additional information and/or context).
- Claims that COVID-19 vaccines contain, or were developed, produced or designed from/with human tissue from aborted fetuses / aborted fetal tissue.
- **Claims involving conspiracy theories about a COVID-19 vaccine or vaccination program, including:**
 - Claims that COVID-19 vaccines are designed to or were developed in order to control a population for non-public health purposes
 - Claims that specific populations are being used or targeted in order to test the true safety or efficacy of a COVID-19 vaccine
 - Claims that vaccines are the reason behind the emergence of COVID variants
- **Claims that something other than a COVID-19 vaccine can vaccinate you against COVID-19 (Added on 4/4)**
- **Claims that COVID-19 vaccines kill or seriously harm people, which we define as leading to any of the following harmful side effects: (Added on 4/4)**
 1. Neurodegenerative diseases (e.g. Alzheimer's, Ataxia, Huntington's disease, Parkinson's disease, Motor neuron disease, Multiple system atrophy, and Progressive supranuclear palsy)
 2. Vulvar aphthous ulcers

The Meta logo, consisting of the infinity symbol followed by the word "Meta".
[Meta](#)

From: [REDACTED]
Sent: 4/5/2022 8:55:02 AM
To: [REDACTED]@fb.com]; [REDACTED]@cdc.gov]
CC: [REDACTED]@fb.com]; [REDACTED]@cdc.gov]
Subject: RE: Follow up Misiinformation Claims about Under 5 Year Olds

[REDACTED]— My best POC on this is out this week so it will be next week before we get back to you. But I think we have time, I don't believe CDC will vote on anything until late April or early May. I may not have the latest info but I don't think this will just roll out next week.

Thanks!

From: [REDACTED]@fb.com>
Sent: Monday, April 4, 2022 5:55 PM
To: [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>
Subject: Re: Follow up Misiinformation Claims about Under 5 Year Olds

Thank you!

From: [REDACTED]@cdc.gov>
Date: Monday, April 4, 2022 at 2:08 PM
To: [REDACTED]@fb.com>, [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>
Subject: RE: Follow up Misiinformation Claims about Under 5 Year Olds

Got it, let me get back to you on this.

From: [REDACTED]@fb.com>
Sent: Monday, April 4, 2022 4:56 PM
To: [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>
Subject: Re: Follow up Misiinformation Claims about Under 5 Year Olds

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Our interpretation is that we now might be a few weeks out from the CDC authorizing one or both vaccines for children, and so I wanted to follow up about the below misinformation claims pertaining to Covid-19 vaccines and children. Would it be possible to let us know which of the below listed claims (plus 2 new ones, indicated in red) have been debunked by the CDC so we can remove the appropriate ones as close as possible to authorization taking place?

As always, happy to set up time to talk through if easier—just let me know!

Many thanks and all the best,
[REDACTED]

From: [REDACTED]@cdc.gov>
Date: Monday, February 14, 2022 at 7:17 AM
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Cc: [REDACTED]@cdc.gov>
Subject: RE: Follow up Misinformation Claims about Under 5 Year Olds

Thanks [REDACTED] - I'll route this through our team here and see what we can do.
[REDACTED]

From: [REDACTED]@fb.com>
Sent: Friday, February 11, 2022 7:00 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@cdc.gov>
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We know how very busy you all are so thank you so much again in advance for your help here!

Best,
[REDACTED]

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 - Multiple sclerosis
 - COVID-19 or a new COVID-19 strain
 - Autism
 - Miscarriages
 - Infertility or sterilization
 - Birth defects
 - Shedding
 - Altering DNA
 - Blood clots (except in relation to specific vaccines for which public health authorities have found possible links or are officially investigating such reports)
 - Alzheimer's
 - Prion's disease
 - Bell's palsy
 - Erectile dysfunctions
 - Cancer
 - Diabetes
 - Autoimmune diseases
 - Antibody-dependent enhancement
 - Weakened immune system
 - Acquired immunodeficiency syndrome (AIDS) or human immunodeficiency virus (HIV)
 - Heart attacks (does not apply to claims of myocarditis or other heart conditions)
 - Multisystem inflammatory syndrome in children (MIS-C)
 - Magnetism
 - Other side-effects which are impossible or irrational, such as taking the vaccine turns you into a monkey (requires additional information and/or context), or gives you "vaccine acquired immune deficiency syndrome," which is not recognized as a disease or condition.
 - Claims that the spike proteins created by the COVID-19 vaccines are dangerous / cytotoxic.
 - Claims that building immunity by getting COVID-19 is safer than getting the vaccine
 - Claims that COVID-19 vaccines are unsafe generally, or for a certain specific group of people, if that group is identified based on protected characteristics or other identifiers not directly related to their personal health, age, or disabilities (e.g. social status, religion, or political views), or that vaccines are unsafe for menstruating women.
 - Claims that being near vaccinated people causes adverse effects on unvaccinated people
 - Claims that breast milk from vaccinated people is harmful to babies/children
- **Claims about the efficacy of COVID-19 vaccines, including:**
 - Claims that COVID-19 vaccines are not effective in preventing severe illness or death from COVID-19 (see Common Questions below for how we define the term "effective")

- Claims that people who are vaccinated are more at risk for getting sick with COVID than people who are unvaccinated
- **Claims about how the COVID-19 vaccine was developed or its ingredients, including:**
 - Claims that COVID-19 vaccines contain toxic, prohibited, or harmful ingredients, microchips, animal products, or anything not on the vaccine ingredient list
 - Claims that COVID-19 vaccines are untested
 - Claims that COVID-19 vaccines contain the mark of the beast
 - Claims that people died as a result of the COVID-19 Pfizer/BioNTech vaccine during clinical trials (Note - We allow claims that people died during the COVID-19 Pfizer/BioNTech clinical trials) (requires additional information and/or context).
 - Claims that COVID-19 vaccines contain, or were developed, produced or designed from/with human tissue from aborted fetuses / aborted fetal tissue.
- **Claims involving conspiracy theories about a COVID-19 vaccine or vaccination program, including:**
 - Claims that COVID-19 vaccines are designed to or were developed in order to control a population for non-public health purposes
 - Claims that specific populations are being used or targeted in order to test the true safety or efficacy of a COVID-19 vaccine
 - Claims that vaccines are the reason behind the emergence of COVID variants
- **Claims that something other than a COVID-19 vaccine can vaccinate you against COVID-19 (Added on 4/4)**
- **Claims that COVID-19 vaccines kill or seriously harm people, which we define as leading to any of the following harmful side effects: (Added on 4/4)**
 - Neurodegenerative diseases (e.g. Alzheimer's, Ataxia, Huntington's disease, Parkinson's disease, Motor neuron disease, Multiple system atrophy, and Progressive supranuclear palsy)
 - Vulvar aphthous ulcers

 Meta



[Meta](#)

From: [REDACTED]@google.com]
Sent: 2/18/2022 11:08:50 AM
To: [REDACTED]@cdc.gov]
Subject: Re: YouTube Call

yes! that's perfect. Would you please send a calendar invite with a link that works for the CDC team? We're still confirming our attendees from YouTube and I'll circle back with their names asap.

[REDACTED]
Google US Federal Government Affairs and Public Policy
[REDACTED]

On Thu, Feb 17, 2022 at 2:33 PM [REDACTED]@cdc.gov> wrote:
How about next Thursday at 11:30 EST?

From: [REDACTED]@google.com>
Sent: Thursday, February 17, 2022 2:04 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@cdc.gov>
Subject: Re: YouTube Call

yes, that is exactly it. Thank you!

[REDACTED]
Google US Federal Government Affairs and Public Policy
[REDACTED]

On Thu, Feb 17, 2022 at 2:03 PM Crawford, [REDACTED]@cdc.gov> wrote:

Hi [REDACTED]— [REDACTED] updated me and we are still working on scheduling, I'll have to get back to you but it won't be possible until late next week. However, let me clarify that the ask still is to foreshadow upcoming changes that might be coming our way that might effect misinformation, correct?

From: [REDACTED]@google.com>
Sent: Thursday, February 17, 2022 2:00 PM
To: [REDACTED]@cdc.gov>; [REDACTED]
[REDACTED]@cdc.gov>
Subject: YouTube Call

Hi [REDACTED] I just wanted to circle back from our conversation on Monday to see if your team has a few minutes to connect with YouTube's trust & safety team regarding covid19 misinformation. Please let me know if a call could be possible tomorrow or early next week?

Thank you!

[REDACTED]

Google US Federal Government Affairs and Public Policy

[REDACTED]

From: [REDACTED]@fb.com]
Sent: 1/7/2022 3:24:00 PM
To: [REDACTED]@cdc.gov]
CC: [REDACTED]@cdc.gov]
Subject: Re: Omicron Policy Updates

Amazing thank you!
As much context as possible would be helpful.

[REDACTED]
Meta | politics & government
[REDACTED]

On Jan 7, 2022, at 3:23 PM, [REDACTED]@cdc.gov> wrote:

[REDACTED] its looking like we'll be able to get back to you by Tuesday and should be via e-mail.

Thanks!

From: [REDACTED]@fb.com>
Sent: Thursday, January 6, 2022 10:46 PM
To: [REDACTED]@cdc.gov>
Subject: Re: Omicron Policy Updates

Thank you!

[REDACTED]
Meta | politics & government
[REDACTED]

On Jan 6, 2022, at 10:41 PM, [REDACTED]@cdc.gov> wrote:

Just letting you know I see this and I will get back to you about the best strategy tomorrow.

From: [REDACTED]@fb.com>
Sent: Thursday, January 6, 2022 11:53:29 AM
To: Crawford, Carol Y. (CDC/OD/OADC) <cjy1@cdc.gov>
Subject: Omicron Policy Updates

Hi [REDACTED]

I have a few more rounds of questions from our misinfo policy team.

A few of them are straightforward, but the others could require some more nuance, which may be easier over a call early next week with the right folks on the horn.

Here's what we've got:

1. We currently remove content that claims COVID-19 is no more dangerous to people than the common flu or cold.

a. Is this claim also false as to the Omicron variant?

2. We currently remove content that claims that the mortality rate of COVID-19 is the same or lower than seasonal influenza.

b. Is this claim also false as to the Omicron variant?

3. We currently remove content that claims that COVID-19 vaccines are not effective in preventing COVID-19.

a. Is this claim also false as to preventing infection from the Omicron variant?

b. If so, how effective are the vaccines in preventing someone from being infected with the Omicron variant?

c. Is it true that COVID-19 vaccines are effective at preventing serious illness and death from Omicron?

4. The CDC [website](#) says: "COVID-19 vaccines are effective at preventing infection, serious illness, and death."

a. Could you provide any additional specificity as to what "effective" means here (e.g. 90% effective at preventing infection)?

b. Is there a point in time post-vaccination when vaccines are no longer effective at preventing either infection, serious illness, or death (e.g. 6 months)?

From: [REDACTED]@fb.com]
Sent: 11/21/2021 11:02:20 AM
To: [REDACTED]@cdc.gov]
Subject: Re: For Review: Booster Language

Thank you!

On Nov 21, 2021, at 8:04 AM, [REDACTED]@cdc.gov> wrote:

It appears accurate. Thanks for checking!

From: [REDACTED]@fb.com>
Sent: Saturday, November 20, 2021 5:25 PM
To: [REDACTED]@cdc.gov>
Subject: For Review: Booster Language

Thanks so much for sending the language last night – I know you’ve said in the past we don’t need approval for external language, but always want to make sure we are staying on the straight and narrow.

Here’s what we’ve got:

CDC Language:

If you receive a Pfizer-BioNTech or Moderna COVID-19 vaccine, you will need 2 initial shots to get the most protection. CDC does not recommend mixing products for a two dose primary vaccine series or an additional primary dose. If you received a Pfizer-BioNTech or Moderna COVID-19 vaccine, you should get the same product when you need a second shot or additional primary dose. However, mixing and matching COVID-19 vaccines is allowed for booster shots.

You should get your second shot as close to the recommended 3-week or 4-week interval as possible. However, your second dose may be given up to 6 weeks (42 days) after the first dose, if necessary. You should not get the second dose early.

People age 18 years and older who received Pfizer-BioNTech or Moderna COVID-19 vaccines may get a booster.

You may choose which COVID-19 vaccine you receive as a booster shot. Some people may prefer the vaccine type that they originally received, and others may prefer to get a different booster. CDC’s recommendations now allow for this type of mix and match dosing for booster shots.

Pfizer-BioNTech or Moderna

You should get a booster if you are:

Ages 50 years and older

Ages 18 years and older and live in a long-term care setting

You may get a booster if you are:

Ages 18 years and older

When to get a booster:

At least 6 months after completing your primary COVID-19 vaccination series

Johnson & Johnson’s Janssen

You should get a booster if you are:

18 years or older

When to get a booster:

At least 2 months after your shot.

FB PROPOSED (CLEAN):

If you receive a Pfizer-BioNTech or Moderna COVID-19 vaccine, you will need 2 initial shots to get the most protection. You should get your second shot as close to the recommended 3-week or 4-week interval as possible.

If you received a Pfizer-BioNTech or Moderna COVID-19 vaccine, you should get the same product when you need a second shot. However, mixing and matching COVID-19 vaccines is allowed for booster shots. You **should** get a booster at least 6 months after completing your primary COVID-19 vaccination series if you are:

- Ages 50 years and older
- Ages 18 years and older and live in a long-term care setting

If you are 18 years old or older and do not live in a long-term care setting, you **may** get a booster.

If you receive Johnson & Johnson's Janssen vaccine, you will need 1 shot to be considered fully vaccinated. If you are 18 years or older, you should get a booster of any COVID-19 vaccine at least 2 months after your shot.

From: [REDACTED]
Sent: 11/8/2021 4:01:34 PM
To: [REDACTED]@fb.com]; [REDACTED]@cdc.gov]; [REDACTED]@cdc.gov]
CC: [REDACTED]@fb.com]
Subject: RE: New Claims & Policy updates following EAU authorization for 5-11 year olds

Hmm. Sorry I missed that, let me check on #2.

From: [REDACTED]@fb.com>
Sent: Monday, November 8, 2021 3:03 PM
To: [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>
Subject: Re: New Claims & Policy updates following EAU authorization for 5-11 year olds

Thanks so much, [REDACTED]! Can you confirm if #2 is False as well? I see the links, but not the answer (or is this one that is still pending?)

From: [REDACTED]@cdc.gov>
Date: Monday, November 8, 2021 at 11:25 AM
To: [REDACTED]@fb.com>, [REDACTED]@cdc.gov>, [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>
Subject: RE: New Claims & Policy updates following EAU authorization for 5-11 year olds

We are still working on the "All Vaccines" section but here are some responses for COVID. Thanks!

It appears that any of these could potentially cause vaccine refusal.

1. **COVID-19 vaccines weaken the immune system**
 - a. Is this false?
 - b. Could this lead to vaccine refusals?

False. COVID-19 vaccination will help protect people from getting COVID-19. Adults and children may have some side effects from the vaccine, which are normal signs that their body is building protection. These side effects may affect their ability to do daily activities, but they should go away in a few days. Some people have no side effects, and allergic reactions are rare. Learn how [mRNA vaccines work](#).

<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/safety/safety-of-vaccines.html> or
<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/expect/after.html>.

2. **COVID-19 vaccines alter blood color/the blood of people who have been vaccinated appears different from the blood of people who have not been vaccinated.**
 - a. Is this false?
 - b. Could this lead to vaccine refusals?

<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/safety/safety-of-vaccines.html> or
<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/expect/after.html>.

3. COVID-19 vaccines cause autoimmune diseases

- a. Is this false?
- b. Could this lead to vaccine refusals?

False. COVID-19 vaccines have undergone—and continue to undergo—the most intensive safety monitoring in U.S. history. Serious side effects were rare and self-limiting.

<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/safety/safety-of-vaccines.html> or
<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/expect/after.html>.

4. Antibody-dependent enhancement (ADE) is a side-effect of COVID-19 vaccines

- a. Is this false?
- b. Could this lead to vaccine refusals?

False. Adults and children may have some side effects from the vaccine, which are normal signs that their body is building protection. These side effects may affect their ability to do daily activities, but they should go away in a few days. Some people have no side effects, and allergic reactions are rare. Find a list of [common side effects](#) and what to expect after vaccination.

5. COVID-19 vaccines cause acquired immunodeficiency syndrome (AIDS)

- a. Is this false?
- b. Could this lead to vaccine refusals?

False. COVID-19 vaccines have undergone—and continue to undergo—the most intensive safety monitoring in U.S. history. Serious side effects were rare and self-limiting.

<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/safety/safety-of-vaccines.html> or
<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/expect/after.html>.

6. Breast milk from a vaccinated parent is harmful to babies/children

- a. Is this false?
- b. Could this lead to vaccine refusals?

False. Recent reports have shown that breastfeeding people who have received mRNA COVID-19 vaccines have antibodies in their breastmilk, which could help protect their babies. More data are needed to determine what level of protection these antibodies may provide to the baby. Learn more about [COVID-19 vaccines and pregnancy](#).

7. COVID vaccine causes multisystem inflammatory syndrome in children (MIS-C)

- a. Is this false?
- b. Could this lead to vaccine refusals?

False. Children who get infected with the virus that causes COVID-19 can develop serious complications like [multisystem inflammatory syndrome \(MIS-C\)](#)—a condition where different body parts become inflamed, including the heart, lungs, kidneys, brain, skin, eyes, or gastrointestinal organs. COVID-19 vaccination among children ages 5 through 11 years is critical to preventing infection and possible severe disease, as well as reducing the spread of COVID-19.

From: [REDACTED]@fb.com>

Sent: Tuesday, November 2, 2021 1:22 PM

To: [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>

[REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>

Subject: New Claims & Policy updates following EAU authorization for 5-11 year olds

Hi [REDACTED] and team!

[REDACTED] thanks so much for confirming the ability for the claims in question last week having the risk of causing vaccine refusals. And thank you all so much for your input over the last week on our many questions about vaccine misinformation relative to the EUA.

I wanted to share that as a result of our work together, when the FDA gave emergency use authorization to the Pfi zer vaccine for children last week, we immediately [updated](#) our policies globally to remove additional false claims about the COVID-19 vaccine for children (e.g. "the COVID vaccine is not safe for kids"). We also launched a new feature on Instagram, where accounts that repeatedly post content that violates our policies on COVID-19 or vaccine misinformation may now lose the ability to be tagged or mentioned or may see pop-ups asking if they'd like to delete certain posts that may violate our policies.

As part of our regular monitoring of new claims about vaccines prevalent on our platform, **we have identified a number of additional claims we would like to get your team's assessment on (apologies this is coming so quickly after the last round that were specific to the EAU's timing!). Would it at all be possible to get input by Monday, November 8th?**

For each of the following new claims, which we've recently identified on the platform, **can you please tell us if:**

1. **The claim is false; and**
2. **If believed, could this claim contribute to vaccine refusals?**

Please let me know if you have any questions or concerns, and otherwise thank you so much in advance for your help!

Best,

Claims about COVID-19 vaccines

1. **COVID-19 vaccines weaken the immune system**
 - a. Is this false?
 - b. Could this lead to vaccine refusals?
2. **COVID-19 vaccines alter blood color/the blood of people who have been vaccinated appears different from the blood of people who have not been vaccinated.**
 1. Is this false?
 2. Could this lead to vaccine refusals?
3. **COVID-19 vaccines cause autoimmune diseases**
 - a. Is this false?
 - b. Could this lead to vaccine refusals?
1. **Antibody-dependent enhancement (ADE) is a side-effect of COVID-19 vaccines**
 1. Is this false?
 2. Could this lead to vaccine refusals?

1. **COVID-19 vaccines cause acquired immunodeficiency syndrome (AIDS)**
 - a. Is this false?
 - b. Could this lead to vaccine refusals?

1. **Breast milk from a vaccinated parent is harmful to babies/children**
 - a. Is this false?
 - b. Could this lead to vaccine refusals?

1. **COVID vaccine causes multisystem inflammatory syndrome in children (MIS-C)**
 - a. Is this false?
 - b. Could this lead to vaccine refusals?

Claims about all vaccines

1. **Vaccines are not effective in preventing diseases for which vaccines exist, or in reducing the risk of illness or mortality from vaccine-preventable diseases.**
 - a. Is this false for all approved vaccines?
 - b. Could this lead to vaccine refusals?

2. **Acquiring a vaccine-preventable disease cannot cause death.**
 - a. Is this false?
 - b. Could this lead to vaccine refusals?

1. **Vitamins and minerals (either derived from natural sources or supplements) are as effective as vaccines in preventing diseases for which vaccines exist.**
 - a. Is this false for all approved vaccines?
 - b. Could this lead to vaccine refusals?

 Meta


[Meta](#)

From: [REDACTED]@fb.com]
Sent: 10/28/2021 7:56:44 PM
To: [REDACTED]@cdc.gov]
Subject: Re: Follow up to Vaccine Misinformation Discussion

Thank you thank you!
I know yall are totally under water right now. Appreciate it.

From: [REDACTED]@cdc.gov>
Date: Thursday, October 28, 2021 at 7:56 PM
To: [REDACTED]@fb.com>
Subject: Re: Follow up to Vaccine Misinformation Discussion

It's being worked on. I wish it had been faster.

From: [REDACTED]@fb.com>
Sent: Thursday, October 28, 2021 7:31:53 PM
To: [REDACTED]@cdc.gov>
Subject: Re: Follow up to Vaccine Misinformation Discussion

Thank you!

Apologies for the badgering — we want to get this right and are relying on your expertise.

Is there someone else who could speak to these perhaps?



On Oct 28, 2021, at 7:18 PM, [REDACTED]@cdc.gov> wrote:

Thanks [REDACTED] — I'm hoping [REDACTED] chimes in.

From: [REDACTED]@fb.com>
Sent: Thursday, October 28, 2021 7:12 PM
To: [REDACTED]@fb.com>; [REDACTED]@cdc.gov>
Cc: [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>; [REDACTED]
[REDACTED]@cdc.gov>
Subject: Re: Follow up to Vaccine Misinformation Discussion
Importance: High

Bumping this—thanks all!

From: [REDACTED]@fb.com>
Date: Thursday, October 28, 2021 at 10:14 AM

To: [REDACTED]@fb.com>, [REDACTED]@cdc.gov>
 Cc: [REDACTED]@cdc.gov>, [REDACTED]@cdc.gov>, [REDACTED]@cdc.gov>
 [REDACTED]@cdc.gov>

Subject: Re: Follow up to Vaccine Misinformation Discussion

Hi All –

I know you're all completely slammed – we are holding on updating our Covid Information Center, FAQs on Covid, and our internal policies until we get the clarification on the highlighted questions below – could we get those today?

Thank you!



Upcoming EAU Authorization for COVID-19 vaccines for kids

- For children 5-15, will the FDA's extension of EUA mean For children 5-15, will the FDA's extension of EUA mean the vaccine is:
 - Safe?
 - Effective?
 - Provides some immunity?
 - Has been appropriately tested?
 - Is non-experimental?
- Is there any evidence that the COVID-19 vaccine kills or seriously harms children?
- Is there any evidence that the COVID-19 vaccine causes any harmful side effects in children?
- Is there any evidence that the COVID-19 vaccine causes any of the following side effects:
 - ALS
 - MS
 - COVID-19
 - Autism
 - Shedding
 - Changing one's genetic makeup or DNA
 - Blood clots
 - Alzheimer's
 - Prion's disease
 - Bell's Palsy
 - Magnetism
 - Future reproductive issues (miscarriages, infertility, birth defects, erectile dysfunction)

Upcoming EAU Authorization for COVID-19 vaccines for kids

- Is there any evidence that the spike proteins in COVID-19 vaccines are dangerous for children?

From: [REDACTED]@fb.com>
Date: Wednesday, October 27, 2021 at 11:57 AM
To: [REDACTED]@cdc.gov>, [REDACTED]@fb.com>
Cc: [REDACTED]@cdc.gov>, [REDACTED]@cdc.gov>, [REDACTED]@cdc.gov>
 [REDACTED]@cdc.gov>

Subject: Re: Follow up to Vaccine Misinformation Discussion

Thanks [REDACTED] and exciting news about the Advisory panels recommendation!

Just checking if there are any updates from your end, [REDACTED]?

Many thanks and all the best,

[REDACTED]

From: [REDACTED]@cdc.gov>
Date: Monday, October 25, 2021 at 10:30 AM
To: [REDACTED]@fb.com>, [REDACTED]@fb.com>
Cc: [REDACTED]@cdc.gov>, [REDACTED]@cdc.gov>, [REDACTED]@cdc.gov>
Subject: RE: Follow up to Vaccine Misinformation Discussion

I don't believe [REDACTED] will be completed by the end of the day but I know she is actively working on it. I've copied her in directly to respond.

From: [REDACTED]@fb.com>
Sent: Monday, October 25, 2021 12:21 PM
To: [REDACTED]@fb.com> [REDACTED]@cdc.gov>
Cc: [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>
Subject: Re: Follow up to Vaccine Misinformation Discussion

Hi all, hope you had a nice weekend. I wanted to follow up about the remaining misinformation claims pertaining to EUA authorization for COVID-19 vaccines for 5-11 year olds.

Would it be possible to confirm whether the highlighted claims in the deck are debunked by CDC by the end of day by chance? That will enable us to begin removing harmful claims ASAP following an announcement this week.

Many thanks!

From: [REDACTED]@fb.com>
Date: Wednesday, October 20, 2021 at 6:54 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>, [REDACTED]@cdc.gov> [REDACTED]@cdc.gov>
Subject: Re: Follow up to Vaccine Misinformation Discussion

Thank you!

On Oct 20, 2021, at 8:47 PM, [REDACTED]@cdc.gov> wrote:

I just wanted to confirm that [REDACTED] is on this and I think she is hoping to have some info by Friday.

From: [REDACTED]@fb.com>
Sent: Tuesday, October 19, 2021 5:31 PM
To: [REDACTED]@cdc.gov>, [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>

From: [REDACTED]@google.com]
Sent: 10/28/2021 7:43:39 PM
To: [REDACTED]@cdc.gov]
Subject: Re: Booster Shots

Hi [REDACTED] I don't have specific questions. We just wanted to connect with you to confirm the link you'll be updating and to confirm key messages etc. it should be fine to keep the call small to just us.

On Thu, Oct 28, 2021 at 7:22 PM [REDACTED]@cdc.gov> wrote:

Can you give me a sense of what you'll need to discuss? I would rather not have a SME if I can answer questions but not sure what is being discussed. I know plans, key messages but not a expert in this.

From: [REDACTED]@google.com>
Sent: Thursday, October 28, 2021 7:18 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@cdc.gov>; [REDACTED]@google.com>; [REDACTED]@cdc.gov>; [REDACTED]@google.com>
Subject: Re: Booster Shots

3:30pm est it is! Would you mind sending an invite so the dial in works for you? Thank you!

On Thu, Oct 28, 2021 at 7:07 PM [REDACTED]@cdc.gov> wrote:

3:30 is best. Right now we have a 4pm I must attend. ■

From: [REDACTED]@google.com>
Sent: Thursday, October 28, 2021 7:06 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@google.com>; [REDACTED]@google.com>; [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>
Subject: Re: Booster Shots

Thanks both for the quick response! On Monday, we can make 3:30pm est work, but anyway 4pm est is open?

[REDACTED]
Google US Federal Government Affairs and Public Policy
[REDACTED]

[REDACTED]

On Thu, Oct 28, 2021 at 5:13 PM [REDACTED]@cdc.gov> wrote:

[REDACTED] – of course not that I look again, I would recommend changing “Learn more & register at Vaccines.gov” to Find a vaccine at Vaccines.gov.

From: [REDACTED]

Sent: Thursday, October 28, 2021 5:11 PM

To: [REDACTED]@google.com>; [REDACTED]@google.com>; [REDACTED]

[REDACTED]@google.com>; [REDACTED]@cdc.gov>; [REDACTED]

[REDACTED]@cdc.gov>

Subject: RE: Booster Shots

I'm sorry this has been in my draft all day!!

This looks good. Thanks for checking.

Yes, we can discuss the pediatric vaccines early next week but let me give you some general info: ACIP is likely to vote on this on Nov 2. CDC is likely to start posting final information on Nov 3 (possibly late Nov 2), if that helps to know. There will be many updates so the changes might span over a few days. We are also looking ahead and misinformation and hope to have a BOLO type meeting later that week with platforms that are interested.

From: [REDACTED]@google.com>

Sent: Thursday, October 28, 2021 8:00 AM

To: [REDACTED]@google.com>; [REDACTED]@google.com>; [REDACTED]

[REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>; [REDACTED]

[REDACTED]@cdc.gov>


Subject: Re: Booster Shots

Hi CDC team,

[REDACTED] OOO so I'm also adding [REDACTED] who is helping while he is out. Given that CDC booster [guidance](#) has changed, we wanted to raise awareness of this upcoming change to our product experience. Please see below for our new text and a mock up and let us know if you have any feedback.

Anticipated new text: “If you have been fully vaccinated with a Pfizer, Moderna or Johnson & Johnson vaccine, you may be eligible for a booster shot.”

Anticipated new mock:

 The linked image cannot be displayed. The file may have been moved, renamed, or deleted. Verify that the link points to the correct file and location.

Also, do you have time to connect early next week on the anticipated guidance on vaccines for 5-11? It would be great to connect as the CDC plans communications on authoritative information for pediatric vaccines.

Thank you,

█ and █

█
Google US Federal Government Affairs and Public Policy

On Thu, Sep 30, 2021 at 5:34 PM █ [@google.com](#) wrote:

Great, thanks!

On Thu, Sep 30, 2021, 2:31 PM █ [@cdc.gov](#) wrote:

Hi █

I heard back from some folks. No heartburn over the message as proposed.

Cheers

From: [REDACTED]
Sent: Thursday, September 30, 2021 4:32 PM
To: [REDACTED]@google.com>
Cc: [REDACTED]@google.com>; [REDACTED]@cdc.gov>; [REDACTED]@cdc.gov>
Subject: RE: Booster Shots

Hi [REDACTED]

I'm informally running it by some folks to see what they think. Looks inclusive and accurate enough to me, but hey, I'm a tech guy and not a vaccine SME!

Get back to you shortly

From: [REDACTED]@google.com>
Sent: Thursday, September 30, 2021 3:53 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@google.com>; [REDACTED]@cdc.gov>
Subject: Booster Shots

Hi [REDACTED]

Following up on our call earlier this week to share a planned update to our vaccine general availability banner (current experience below).

As discussed, we plan to add a one liner on the latest booster shot guidance from the CDC/Vaccines.gov. Please let us know if the CDC is comfortable with the following summary sentence based on the [CDC's banner](#):

- *You may be eligible for a booster shot if you received a second dose of the Pfizer COVID-19 vaccine 6+ months ago and are an adult age 65+ years, or 18+ years and at risk due to circumstances or a medical condition.*

Thanks,

[REDACTED]

--

[REDACTED]@google.com

--

[REDACTED]
Google US Federal Government Affairs and Public Policy
[REDACTED]

[REDACTED]

[REDACTED]

Google US Federal Government Affairs and Public Policy

[REDACTED]

From: [REDACTED]
Sent: 8/18/2021 7:04:07 AM
To: [REDACTED]@fb.com]
CC: [REDACTED]@cdc.gov]
Subject: RE: Crowd Tangle COVID-19 reports

Hi [REDACTED] I'm going to be out of the office for several weeks in September. When you send these, can you please include [REDACTED] copied here, so she can share with others if I'm out? Thanks so much!

From: [REDACTED]<tlw@fb.com>
Sent: Tuesday, August 17, 2021 5:23 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Attached, please find the latest CrowdTangle content insights report for the period of July 28 – Aug 11. You will find the summary from this report below:

Highly engaged COVID vaccine-related content overall [Slides 3-4] across Pages feature posts discussing vaccine and other COVID-related mandates as the Delta variant continues to spread in the United States. Similarly in public groups, the posts with the highest interactions feature content about COVID mandates and repercussions faced by those who refuse to comply. In this report, we will explore highly engaging content within the following themes:

- **Vaccine Booster Shots:** Major publications share news about the expected FDA approval for a COVID vaccine booster to protect those with compromised immune systems from the Delta variant. Conversely, the World Health Organization released a statement imploring wealthy countries to hold off on providing booster shots until every country vaccinates at least 10% of their population. [Slides 5-6]
- **FDA Vaccine Approval:** With a new surge of COVID-19 cases, the Food and Drug Administration has pushed to fully approve Pfizer-BioNTech's COVID-19 vaccine by early September. The FDA believes that this step might inspire more confidence from the public in the vaccine. [Slides 7-8]
- **COVID-19 Mandates:** As COVID cases rise in the US, federal and state governments as well as businesses have implemented new mandates to combat the surge. On the other hand, many conservative politicians are calling for an end to government mandated restrictions and vaccinations. [Slides 9-10]
-

Let us know if you have any questions or specific keywords / topics you'd like for us to explore in the next report. As always, please do not share.

Thanks,

[Facebook](#) | [CrowdTangle](#)

From: [REDACTED]@cdc.gov>
Sent: Wednesday, August 4, 2021 6:24 AM
To: [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: RE: Crowd Tangle COVID-19 reports

Thank you!

From: [REDACTED]@fb.com>
Sent: Tuesday, August 3, 2021 6:16 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Attached, please find the latest CrowdTangle content insights report for the period of July 14 – July 27. You will find the summary from this report, below:

Highly engaged COVID vaccine-related content overall [Slides 3-4] across Pages continues to feature UNICEF posts relating global vaccine donation and distribution efforts. In public groups, the posts with high interactions feature content debating COVID-19 vaccination requirements as well as COVID-19 survival stories. In this report, we also explore highly engaging content within the following themes:

- **The Delta Variant:** As the Delta variant surges, several top posts from Pages and Groups discuss concerns about and experiences with COVID-19 and the new strain. Many posts advocate for individuals to get vaccinated due to the increased severity of symptoms and high transmissibility associated with the Delta variant. [Slides 5-6]
-
- **Proof of Vaccination Requirement:** Governments and public services are signaling the importance of requiring proof of vaccination at bars, concerts, and hospitals to help combat the spread of COVID-19. The highest

engaged posts from Pages and Groups share articles about shifting guidelines and responses to those mandates. [Slides 7-8]

- **COVID-19 and Unvaccinated Individuals:** A rise in COVID-19 cases across the U.S. has contributed to concerns that the recent uptick in hospitalizations and deaths is being driven by unvaccinated individuals. High interaction public Page and Group posts for this topic continue the debate over the necessity of being vaccinated. [Slides 9-10]

Let us know if you have any questions or specific keywords / topics you'd like for us to explore in the next report. As always, please do not share.

Thanks,

[REDACTED]

[REDACTED]

Strategic Partner Development, Policy | CrowdTangle

[REDACTED]

[Facebook](#) | [CrowdTangle](#)

From: [REDACTED]@fb.com>

Sent: Tuesday, July 20, 2021 2:22 PM

To: [REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>;

[REDACTED]@fb.com>

Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED],

Attached, please find the latest CrowdTangle content insights report for the period of June 30 – July 13 (attached). Here's the summary from this report, below:

Highly engaged COVID vaccine-related content overall [Slides 3-4] across Pages continues to include UNICEF's posts, as well as posts related to Pres. Biden's new strategy to increase vaccinations. In public groups, the posts with high interactions feature content debating COVID-19 vaccinations. In this report, we also explore highly engaging content within the following themes:

- **Reopening of Institutions:** Many of the highest engaged Page posts with keywords related to this theme share news of shifting public health policies allowing people to return to work, school, and religious services. Several posts focus on new guidelines for students returning back to school, with some expressing skepticism about vaccinating children. [Slides 5-6]
- **Olympics and COVID-19:** As the Tokyo Olympics draws closer, several high interaction Page posts on this discuss the recent spectator ban at the Olympics due to Tokyo's state of emergency from rising coronavirus cases. Also, many US publishers and pundits shared posts about US Olympic swimmer Michael Andrew refusing to be vaccinated ahead of Tokyo Olympics. [Slides 7-8].

- **Door-to-Door Vaccines:** The highest interaction Page posts for this topic convey concern from political opponents about the Biden administration's strategy to ramp up vaccination efforts in communities with low vaccination rates by going "door-to-door" to educate and encourage more Americans to get vaccinated. [Slides 9-10] Let us know if you have any questions or specific keywords / topics you'd like for us to explore in the next report. As always, please do not share.

Thanks,

[REDACTED]

[REDACTED]

[Facebook](#) | [CrowdTangle](#)

From: [REDACTED] <[REDACTED]@cdc.gov>
Sent: Tuesday, June 22, 2021 2:02 PM
To: [REDACTED] <[REDACTED]@fb.com>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: RE: Crowd Tangle COVID-19 reports

Thank you!

From: [REDACTED] <[REDACTED]@fb.com>
Sent: Tuesday, June 22, 2021 4:43 PM
To: [REDACTED] <[REDACTED]@cdc.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Looking forward to working with your team!

Attached, please find the latest CrowdTangle content insights report for the period of June 2 – June 16 (attached). I also want to make you aware that the next bi-weekly content insights report will be sent to you on Tuesday, July 20th instead of July 6th as I will be out of the office next week until July 7th.

Here's the quick summary from this report:

Highly engaged COVID vaccine-related content overall [Slides 3-4] across Pages continues to include UNICEF's posts, as well as posts related to global vaccine distribution in third world countries. In public groups, the posts with high

interactions feature content related to the suspension of hospital workers for refusing the vaccine. In this report, we also explore highly engaging content within the following themes:

- **Global Vaccinations:** Many of the highest engaged Page posts with related keywords report on the global vaccine supply and efforts being undertaken by world leaders to reach every country. The most engaged Group posts feature news of the United States' commitment to donate supplies to vaccine-deprived countries. [Slides 5-6]
 -
 - **Vaccine Side Effects:** A number of high interaction Page posts on this topic express continued interest in and concerns about potential vaccine side effects, especially for children and pregnant women. Highly engaged Group posts reveal similar themes of hesitation and skepticism related to the long-term effects of the vaccine. [Slides 7-8].
 -
 - **Vaccine Refusal:** The highest interaction Page posts for this topic are from media outlets and personalities reacting to a recent court decision effectively upholding a Texas hospital's COVID vaccine mandate for its employees. The most engaged Group posts for this topic highlighted similar themes. [Slides 9-10]
- Let us know if you have any questions or specific keywords / topics you'd like for us to explore in the next report. As always, please do not share.

Thanks,



[Facebook](#) | [CrowdTangle](#)

From: [REDACTED] <[REDACTED]@cdc.gov>
Sent: Wednesday, June 9, 2021 7:20 AM
To: [REDACTED] <[REDACTED]@fb.com>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: RE: Crowd Tangle COVID-19 reports

Thank you and appreciate [REDACTED] taking over for us!

From: [REDACTED] <[REDACTED]@fb.com>
Sent: Tuesday, June 8, 2021 8:13 PM
To: [REDACTED] <[REDACTED]@cdc.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Attaching the latest CrowdTangle content insights report for the period of May 19-June 1 (attached). I wanted to note that [REDACTED] (cc'ed) is taking over the oversight for these reports, and will be providing them to you going forward. Here's the quick summary from this report:

Highly engaged COVID vaccine-related content overall [Slides 3-4] across Pages continues to include UNICEF's posts, as well as posts related to vaccine refusal and discrimination. In public Groups, high-interaction posts include posts around vaccine passports and required vaccination, along with personal stories from COVID survivors or of side effects. In this report, we also explore highly engaged content within the following themes:

- **Vaccination Lawsuits:** Many of the highest engaged Page posts with related keywords report on lawsuits over compulsory vaccinations related to employment. Additionally, there are reports of lawsuits attempting to stop children from being vaccinated. Group posts include varied stances on the same topics. [Slides 5-6]
- **Deciding to Get Vaccinated:** A number of high interaction Page posts on this topic come from public figures, with many politicians weighing in on both sides of the aisle. In Groups, we see posts from individuals reacting to this debate, sharing their personal thoughts and concerns. [Slides 7-8]
- **Pandemic Origins:** High interaction Page posts on the origins of COVID-19 shared news of the changing theories about COVID being potentially man-made, as well as changing social media policies around related content. Group posts covered similar topics, with meme posts around the same themes appearing as well. [Slides 9-10]

Let us know if you have any questions or particular keywords/topics you'd like us to explore for the next report.

Thanks,

From: [REDACTED]@fb.com>

Date: Monday, March 15, 2021 at 6:19 PM

To: [REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]

[REDACTED]@fb.com>

Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED],

Attaching the latest CrowdTangle content insights report for the period of February 24-March 10 (attached). Here's the quick summary:

Top engaged COVID vaccine-related content overall across Pages and Groups [Slides 3-4] continues to include many posts from UNICEF, as well as politically-related commentary and news around the vaccine rollout. Public figure vaccinations (notably, Dolly Parton's) garnered high engagement from Pages, while Groups still saw high engagement around personal experiences, in addition to more general news-sharing around vaccines. However, posts falling into the following themes also garnered high engagement:

- **Post-vaccination guidelines and protocols** drew high engagement after the CDC's new guidelines were announced, with the idea that "vaccinated people can gather without masks" appearing in headlines in Page posts. Group posts considered how the update might affect their specific interests and communities. [Slides 5-6]
- **Vaccine ingredients** saw higher interactions during this period in posts about fetal cells in the Johnson & Johnson vaccine, and religious leaders' corresponding recommendations to avoid it. [Slides 7-8]
- **Vaccine side effects** continue to be mentioned in posts mythbusting, educating, and reporting on different side effects, but also in personal Group posts looking for advice or commiseration around vaccine experiences and reactions as more people get vaccinated. [Slides 9-10]

This week, we also are including a one-off content insights report we did looking at Spanish-language content relevant to the US, which we thought might be interesting for you (as always, please do not share externally).

Let us know if you have any questions or particular keywords/topics you'd like us to explore for the next report.

Thanks,
[REDACTED]

From: [REDACTED]@fb.com>
Date: Monday, March 1, 2021 at 6:03 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]
[REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

And adding in [REDACTED], apologies!

From: [REDACTED]@fb.com>
Date: Monday, March 1, 2021 at 5:47 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com> [REDACTED]@fb.com>, [REDACTED]
<[REDACTED]@fb.com>
Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED],

Attaching the latest CrowdTangle content insights report for the period of February 10-24 (attached). Here's the quick summary:

Top engaged COVID vaccine-related content overall across Pages and public Groups in the CrowdTangle database [Slides 3-4] continues to include posts from UNICEF, as well as politically-related commentary/news around the vaccine rollout. Human-interest news stories around vaccination also garnered high engagement from Pages, while Groups saw higher engagement around personal experiences (both getting vaccinated or mentioning vaccines in the context of life updates). However, posts falling into the following themes also garnered high engagement:

- **COVID-19 and mental health** keywords appeared in multiple highly-engaged Page posts that focused on mental health effects on young people during the pandemic, with varying levels of criticism about how the situation is being handled. High-interaction Group posts tended to highlight personal struggles. [Slides 5-6]
- **Vaccine refusal** appeared in two main contexts in highly engaged posts - military refusals and consequences (often employment-related) for refusing the vaccine. [Slides 7-8]
- **Testing positive post-vaccination** appeared in news reports (seen in Page posts) covering specific instances, with especially high interactions around a story of four people in Oregon. Groups also shared similar news, but higher-engagement posts there tended to share personal stories or look for advice. [Slides 9-10]

As always, please let us know if you have any questions or particular keywords/topics you'd like us to explore for the next report.

Thanks,
[REDACTED]

From: [REDACTED]@cdc.gov>
Date: Wednesday, February 17, 2021 at 5:37 AM
To: [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]

<[REDACTED]@fb.com>

Subject: RE: Crowd Tangle COVID-19 reports

Thank you – very helpful!

From: [REDACTED]@fb.com>

Sent: Tuesday, February 16, 2021 9:00 PM

To: [REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>

Subject: Re: Crowd Tangle COVID-19 reports

Hi [REDACTED]

Attaching the latest CrowdTangle content insights report for the period of January 27-February 10 (attached). Here's the quick summary:

Top engaged COVID vaccine-related content overall across Pages and Groups [Slides 3-4] includes a number of posts from UNICEF, celebrations and condemnations of the successes and failure of the vaccine rollout, and some additional criticism/skepticism around the vaccine and its efficacy (primarily in Groups). However, posts falling into the following themes also garnered high engagement:

- **Reports of deaths post-vaccination** continue to garner high interactions from both Pages (largely news organizations) and Groups, where a few personal reports appear mixed in with news articles. [Slides 5-6]
- **Double-masking**, while not directly related to the vaccine, drew high engagement as new studies and recommendations around wearing two masks were shared by both Pages and Groups. Some high-interaction posts from Pages mocked the idea and Fauci's changing position on it, while in Groups criticism came in meme form. [Slides 7-8]
- **Personal reports of vaccination** continue as more people are vaccinated. On Pages, highly engaged posts tend to highlight the experiences of public figures or government officials, but more graphic experiences with side effects - some looking for reassurance - garnered high interactions in Groups. [Slides 9-10]

As always, please let us know if you have any questions or particular keywords/topics you'd like us to explore for the next report.

Thanks,

From: [REDACTED]@cdc.gov>

Date: Tuesday, February 2, 2021 at 7:51 AM

To: [REDACTED]@fb.com>

Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]

<[REDACTED]@fb.com>

Subject: RE: Crowd Tangle COVID-19 reports

Thank you!

From: [REDACTED]@fb.com>

Sent: Monday, February 1, 2021 8:39 PM

To: [REDACTED]@cdc.gov>

Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
 Subject: Crowd Tangle COVID-19 reports

Hi All,

Sending along the latest CrowdTangle content insights report for the period of January 14-28 (attached). As always, please let us know if you have any questions or particular keywords/topics you'd like us to explore for the next report. Here's the quick summary:

Top engaged COVID and vaccine-related content overall across Pages and Groups [Slides 3-4] included many posts from large health organizations like UNICEF, news around government and brands' COVID plans, and people reporting on their current local situation. However, posts falling into the following themes also garnered high engagement:

- **Vaccine and COVID variant** news drove high interactions, with reports and concern around vaccine effectiveness against new strains. In Groups, variants also entered the anti-vaccination conversation. [Slides 5-6]
- **Vaccine side effects** continued to be mentioned in highly-engaged posts, though they included educational content side effects and personal stories of minimal side effects from vaccination. However, reports of specific cases of severe side effects and death continued to garner engagement. [Slides 7-8]
- **Mandatory vaccination and vaccine passports** made news in posts from Pages as a result of new technology and United Airlines' desire to make vaccines mandatory. Group posts speculate about travel logistics and specific scenarios that will personally affect the various posters and audiences. [Slides 9-10]

As before, links to CrowdTangle Searches are included with each topic if you'd like to explore more!

Thanks,

From: [REDACTED]@fb.com>
 Date: Tuesday, January 26, 2021 at 11:51 AM
 To: [REDACTED]@fb.com>, [REDACTED]@cdc.gov>
 Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>
 Subject: Re: Crowd Tangle COVID-19 reports for WHO

Thank you [REDACTED] and [REDACTED]!

[REDACTED], as [REDACTED] mentioned, we'll send the next one on February 1st. Glad to hear they look like they will be useful!

Best,

From: [REDACTED]@fb.com>
 Date: Tuesday, January 26, 2021 at 11:34 AM
 To: [REDACTED]@cdc.gov>
 Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]@fb.com>
 Subject: Re: Crowd Tangle COVID-19 reports for WHO

Lol, no we didn't' speak to Census. Just a coincidence! :)

[REDACTED], feel free to send the reports directly to [REDACTED] and cc [REDACTED] and I and thank you for your work on these and do adjust if CDC has any suggestions for content.

Best,

[REDACTED]

From: [REDACTED]@cdc.gov>
Date: Tuesday, January 26, 2021 at 1:35 PM
To: [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]@fb.com>
Subject: RE: Crowd Tangle COVID-19 reports for WHO

Sorry my delay in response, I overlooked this yesterday. It looks wonderful and much appreciated. For now, send to me but I will be extending our distribution list.

One group we'll be adding is the Census group who hopefully will soon start their project with us. (Did you by chance talk to them yesterday? As this just came up with them yesterday?). Also, the wide group of those looking at misinfo will want this.

THANK you! I will let you know if there is additional feedback.

From: [REDACTED]@fb.com>
Sent: Monday, January 25, 2021 5:51 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com> [REDACTED]@fb.com>
Subject: Crowd Tangle COVID-19 reports for WHO

Hi [REDACTED]

I am following up on our conversation several weeks ago about providing more detailed reporting from our CrowdTangle team. I wanted to share our first CrowdTangle COVID content report with you courtesy of [REDACTED] and [REDACTED] on the cc. They are providing these to WHO, and thought it helpful for CDC teams as well. This report covers the time period of Jan 1 to January 14th. Going forward, these reports will be developed bi-weekly, with the next one ready for delivery on February 1. Who would you like these sent to?

[REDACTED] can do that distro and just put you/[REDACTED], me, and [REDACTED] on cc if that works. But you let us know what you are thinking and if you want to distribute.

The full report is attached, but some highlights the CrowdTangle team would like to call to your attention are:

- Top engaged COVID and vaccine-related content overall across Pages and Groups [Slides 3-4] was largely a mix of educational posts, reports of successful vaccinations (from public figures and users), and news/commentary on COVID and the vaccination rollout.
- However, posts falling into the following themes, all of which have potential risks, also garnered high engagement:
 1. **Reports of healthcare workers refusing the vaccine**, driven largely by an article from Forbes, were widely shared and received high engagement in healthcare worker-centric Groups, as well as anti-vaccination Groups. [Slides 5-6]
 2. **Posts about alleged vaccine-related deaths**, especially news of a Miami doctor's death that is under investigation, got high engagement. Groups, especially anti-vaccination Groups, tended to share a larger variety of reported deaths from around the globe. [Slides 7-8]

3. **News and reports of severe vaccine side effects included both first- and secondhand reports in Groups**, with users sharing photos and video related to their own experiences. Highly engaged Page posts contained some news reports of bad side effects, but also included content meant to educate the public (including from the CDC). [Slides 9-10]

We've included links to the searches we used to develop these insights in the report, but please let us know if you or anyone on your team has trouble accessing these searches. And of course, we welcome your feedback on the report's content, template and any other areas that might make these most effective for your team.

Thank you,
[REDACTED] and team

From: [REDACTED]@fb.com]
Sent: 8/2/2021 8:06:46 PM
To: [REDACTED]@cdc.gov]; [REDACTED]@fb.com]
CC: [REDACTED]@fb.com]; [REDACTED]@cdc.gov]
Subject: Re: Misinfo questions

Super helpful, thank you [REDACTED]!

From: [REDACTED]@cdc.gov>
Date: Saturday, July 31, 2021 at 7:30 AM
To: [REDACTED]@fb.com>, [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>, [REDACTED]@cdc.gov>
Subject: Misinfo questions

[REDACTED] – Per our conversation here is some additional info that might help you all. I know you maybe on vacation so hopefully others will forward on to your team. 😊

1. Spike protein in COVID-19 vaccines is dangerous/cytotoxic **False**
2. Guillain-Barre Syndrome (GBS) is a possible side effect of the COVID vaccine **True, there have been increased reports of Guillain-Barré Syndrome (GBS) in people who have received the J&J/Janssen COVID-19 Vaccine, but not the mRNA COVID-19 vaccines. These reports are rare.** CDC will continue to monitor for and evaluate reports of GBS occurring after COVID-19 vaccination and will share more information as it becomes available.
3. Heart inflammation is a possible side effect of COVID-19 vaccines **True, there have been increased reports of myocarditis, mostly in younger males under 30 years of age, who received mRNA COVID-19 vaccines. These reports are rare.** CDC and its partners are investigating these reports to assess the relationship to COVID-19 vaccination.



From: [REDACTED]@fb.com]
Sent: 7/28/2021 2:46:45 PM
To: [REDACTED]@cdc.gov]; [REDACTED]@fb.com]
CC: [REDACTED]@cdc.gov]; [REDACTED]@fb.com]
Subject: Re: FB Misinformation Claims_Help Debunking

Great! I'll let [REDACTED] gather some more claims and before we set a date, I'll reach out on topics so you can get the right folks on the call.

From: [REDACTED]@cdc.gov>
Date: Wednesday, July 28, 2021 at 2:36 PM
To: [REDACTED]@fb.com>, [REDACTED]@fb.com>
Cc: [REDACTED]@cdc.gov> [REDACTED]@fb.com>
Subject: RE: FB Misinformation Claims_Help Debunking

Yes, we would love to do that. I do think getting the claims several days in advance will be critical to being sure we have what you need.

From: [REDACTED]@fb.com>
Sent: Wednesday, July 28, 2021 2:30 PM
To: [REDACTED]@cdc.gov>; [REDACTED]@fb.com>
Cc: [REDACTED]@cdc.gov> [REDACTED]@fb.com>
Subject: Re: FB Misinformation Claims_Help Debunking

Thank you so much [REDACTED]!

[REDACTED] and I have been talking about in addition to our weekly meetings, doing a monthly misinfo / debunking meeting, with maybe claim topics communicated a few days prior so that you can bring in the matching experts and chat casually for 30 minutes or so. Is that something you'd be interested in?

From: [REDACTED]@cdc.gov>
Date: Wednesday, July 28, 2021 at 1:57 PM
To: [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>, [REDACTED]@cdc.gov>, [REDACTED]@fb.com>
Subject: RE: FB Misinformation Claims_Help Debunking

[REDACTED] – Below is some details from the team. I know it is a lot, does it give you what you need? In terms of the global database question at the end, I included some VAERS background below. This page adds more context: [Selected Adverse Events Reported after COVID-19 Vaccination | CDC](#). But I wasn't able to obtain recommended database.

Let me know if this doesn't work!

Spike protein in COVID-19 vaccines is dangerous/cytotoxic

Messenger RNA (mRNA) vaccines are one type of COVID-19 vaccine. Messenger mRNA vaccines work by teaching our cells to create a **harmless spike protein**. Spike proteins are ideal targets for vaccines. If you are exposed to the real COVID-19 virus after receiving a mRNA vaccination, your body will recognize it and fight it off by triggering an immune response inside your body. The cell breaks down and gets rid of the mRNA soon after it is finished using the instructions.

mRNA vaccines cannot give someone the virus because they do not use the live virus that causes COVID-19. The mRNA vaccine does not interact with your DNA in any way. The mRNA never enters the nucleus of the cell where the DNA is kept. mRNA vaccines have been held to the same [rigorous safety and effectiveness standards](#) as all other types of vaccines in the United States. Researchers have been studying and working with mRNA vaccines for decades. RNA vaccines have been studied before for flu, Zika, rabies, and cytomegalovirus (CMV).

Provide link to graphic. [How mRNA COVID-19 Vaccines Work \(cdc.gov\)](#)

Guillain-Barre Syndrome (GBS) is a possible side effect of the COVID vaccine

The Centers for Disease Control and Prevention (CDC) and the Food and Drug Administration (FDA) are monitoring reports of [Guillain-Barré Syndrome](#) (GBS) in people who have received the J&J/Janssen COVID-19 Vaccine.

GBS is a rare disorder where the body's immune system damages nerve cells, causing muscle weakness and sometimes paralysis. Most people fully recover from GBS, but some have permanent nerve damage.

After 12.8 million J&J/Janssen COVID-19 Vaccine doses administered, there have been around 100 preliminary reports of GBS identified in VAERS as of July 12. These cases have largely been reported about 2 weeks after vaccination and mostly in men, many 50 years and older. CDC will continue to monitor for and evaluate reports of GBS occurring after COVID-19 vaccination and will share more information as it becomes available.

Recent data indicates thousands of hospitalizations are estimated to be prevented as a result of J&J/Janssen COVID-19 vaccination. The benefits of using the J&J/Janssen COVID-19 vaccine under the Food and Drug Administration's (FDA) Emergency Use Authorization (EUA) clearly outweigh the risks of GBS.

Heart inflammation is a possible side effect of all COVID-19 vaccines (including non mRNA vaccines)

- Myocarditis is inflammation of the heart muscle, and pericarditis is inflammation of the outer lining of the heart. In both cases, the body's immune system causes inflammation in response to an infection or some other trigger.
- More than 177 million people have received at least one dose of COVID-19 vaccine in the United States, and CDC continues to monitor the safety of COVID-19 vaccines for any health problems that happen after vaccination.
- Since April 2021, there have been more than a thousand reports to the Vaccine Adverse Event Reporting System (VAERS) of cases of inflammation of the heart—called myocarditis and pericarditis—happening after mRNA COVID-19 vaccination (i.e., Pfizer-BioNTech, Moderna) in the United States.
- These reports are rare, given the hundreds of millions of vaccine doses administered, and have been reported after mRNA COVID-19 vaccination, particularly in adolescents and young adults.
- CDC and its partners are actively monitoring these reports, by reviewing data and medical records, to learn more about what happened and to understand any relationship to COVID-19 vaccination.
- Most patients who received care responded well to treatment and rest and quickly felt better.
- Confirmed cases have occurred:
 - Mostly in male adolescents and young adults age 16 years or older
 - More often after getting the second dose than after the first dose of one of these two mRNA COVID-19 vaccines

- Typically within several days after COVID-19 vaccination
- Patients can usually return to their normal daily activities after their symptoms improve. They should speak with their doctor about return to exercise or sports.

Most patients who received care responded well to treatment and rest and quickly felt better.

CDC continues to recommend COVID-19 vaccination for everyone 12 years of age and older, given the risk of COVID-19 illness and related, possibly severe complications. Getting vaccinated is the best way to protect yourself and your family from COVID-19. More information will be shared as it becomes available.

Global source of truth/database for vaccine adverse effects including possibly vaccine-related deaths:

VAERS is a passive reporting system, meaning it relies on people sending in reports of their experiences after vaccination. The information is not submitted in real time. Also, VAERS is not designed to determine if a vaccine caused or contributed to an adverse event, such as death. A report to VAERS does not mean the vaccine caused the event. Reports of deaths following COVID-19 vaccination that are reported to VAERS are extracted and posted for transparency. Under EUA, healthcare providers are required to report any of the following (it also has the disclaimer they that have to report events regardless if the reporter thinks the vaccine caused it):

“Healthcare providers are required to report to VAERS the following adverse events after COVID-19 vaccination [under Emergency Use Authorization (EUA)], and other adverse events if later revised by FDA:

- Vaccine administration errors, whether or not associated with an adverse event (AE)
- Serious AEs regardless if the reporter thinks the vaccine caused the AE. Serious AEs per FDA are defined as:
 1. Death;
 2. A life-threatening AE;
 3. Inpatient hospitalization or prolongation of existing hospitalization;
 4. A persistent or significant incapacity or substantial disruption of the ability to conduct normal life functions;
 5. A congenital anomaly/birth defect;
 6. An important medical event that based on appropriate medical judgement may jeopardize the individual and may require medical or surgical intervention to prevent one of the outcomes listed above.
- Cases of Multisystem Inflammatory Syndrome
- Cases of COVID-19 that result in hospitalization or death

Healthcare providers are encouraged to report to VAERS any additional clinically significant AEs following vaccination, even if they are not sure the vaccine caused the event.”

From: [REDACTED]@fb.com>
 Sent: Monday, July 26, 2021 12:58 PM
 To: [REDACTED]@cdc.gov>
 Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>
 Subject: FB Misinformation Claims_Help Debunking

Hi [REDACTED], I hope you're well!

Our Misinformation Policy team has identified some claims that we were hoping your team could **help us understand if they are false and can lead to harm?** The three claims include:

1. Spike protein in COVID-19 vaccines is dangerous/cytotoxic
2. Guillain-Barre Syndrome (GBS) is a possible side effect of the COVID vaccine
3. Heart inflammation is a possible side effect of all COVID-19 vaccines (including non mRNA vaccines)

In addition, I was wondering if your team was aware of any global source of truth/database for vaccine adverse effects including possibly vaccine-related deaths?

Please let me know if you have any questions about the above, and thank you so much again for the CDC's help!

Best,

[REDACTED]

[REDACTED]

FACEBOOK

From: [REDACTED]
Sent: 7/26/2021 1:14:50 PM
To: [REDACTED]@fb.com]
CC: [REDACTED]@fb.com]; [REDACTED]@fb.com]
Subject: RE: FB Misinformation Claims_Help Debuning

Got it, let me get back to you shortly and thank you much for asking!

From: [REDACTED]@fb.com>
Sent: Monday, July 26, 2021 12:58 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: FB Misinformation Claims_Help Debuning

Hi [REDACTED], I hope you're well!

Our Misinformation Policy team has identified some claims that we were hoping your team could **help us understand if they are false and can lead to harm?** The three claims include:

1. Spike protein in COVID-19 vaccines is dangerous/cytotoxic
2. Guillain-Barre Syndrome (GBS) is a possible side effect of the COVID vaccine
3. Heart inflammation is a possible side effect of all COVID-19 vaccines (including non mRNA vaccines)

In addition, I was wondering if your team was aware of any global source of truth/database for vaccine adverse effects including possibly vaccine-related deaths?

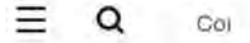
Please let me know if you have any questions about the above, and thank you so much again for the CDC's help!

Best,
[REDACTED]

[REDACTED]
FACEBOOK

From: [REDACTED]
Sent: 6/30/2021 7:50:15 AM
To: [REDACTED]@twitter.com]
Subject: RE: COVID Misinformation

Hi [REDACTED] – I’ve been trying to enter info but I realize I’ve been unclear on where to enter them. I went to /forms and there is a drop down on things to submit but none of them seem relevant to misinformation. Am I in the right place?



- Pages
- Check accounts on
- Write accounts on
- Twitter myths
- Rules

Contact Us > [Partner Support](#)

Report any issue to get priority service

What type of problem are you having with your Twitter account? (required)

From: [REDACTED]@twitter.com>
Sent: Thursday, May 27, 2021 2:30 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@reingold.com> [REDACTED]@reingold.com>; [REDACTED]@cdc.gov>
Subject: Re: COVID Misinformation

Hi all - [REDACTED] you should now be fully. When you visit the Twitter help center logged in with your account you should see additional reporting options.

On Mon, May 24, 2021 at 3:14 PM [REDACTED]@twitter.com> wrote:

Thanks for letting me know - I've just sent a note to our team requesting an update.

On Mon, May 24, 2021 at 3:06 PM [REDACTED]@cdc.gov> wrote:

I haven't seen anything come through so far.

From: [REDACTED]@twitter.com>
Sent: Monday, May 24, 2021 2:57 PM
To: [REDACTED]@reingold.com>
Cc: [REDACTED]@cdc.gov>; [REDACTED]@reingold.com>; [REDACTED]
[REDACTED]@cdc.gov>
Subject: Re: COVID Misinformation

Hi [REDACTED] and I had a sidebar and I requested her account be enrolled. Your email reminds me that the process should have been completed by now - I'll check with on our team to make sure she's properly enrolled.

On Mon, May 24, 2021 at 2:28 PM [REDACTED]@reingold.com> wrote:

Hi [REDACTED]

I hope you had a good weekend. I'm following up about the partner support portal enrollment for CDC. Does the Twitter account need to be connected to a [cdc.gov](https://www.cdc.gov) email or is any account fine? Also, would there be any issues or complications stemming from flagging COVID misinformation on the portal using the existing [census.gov](https://www.census.gov) accounts that have access? We'll want to have at least some CDC accounts whitelisted, but that backup may be helpful in the short-term.

Let us know any next steps we can take to make sure CDC is all set with the portal.

Thanks,

[REDACTED]

Reingold

[REDACTED]

[reingold.com](https://www.reingold.com)

We're on a mission. ***Yours.***

From: [REDACTED]
Sent: Tuesday, May 11, 2021 8:50 AM
To: [REDACTED]@twitter.com>
Subject: RE: COVID Misinformation

Does it need to be the CDC account or my personal? If CDC, I'm going to have someone on staff enroll instead of me.

If personal is OK, it is: [REDACTED]

From: [REDACTED] <[REDACTED]@twitter.com>

Sent: Monday, May 10, 2021 8:51 PM

To: [REDACTED] <[REDACTED]@cdc.gov>

Cc: [REDACTED] <[REDACTED]@reingold.com>; [REDACTED] <[REDACTED]@reingold.com>; [REDACTED] <[REDACTED]@census.gov>; [REDACTED] <[REDACTED]@cdc.gov>

Subject: Re: COVID Misinformation

Hi [REDACTED] -

I'd be glad to enroll you in our Partner Support Portal, which allows you a special, expedited reporting flow in the Twitter Help Center. It worked very well with Census colleagues last year.

You need a Twitter account (and to be logged into that account) to access the Partner Support Portal. What account (or accounts) would you like me to enroll?

Best,
[REDACTED]

On Mon, May 10, 2021 at 5:05 PM [REDACTED] <[REDACTED]@cdc.gov> wrote:

[REDACTED] - I don't think we have info on how to enroll but we'd be happy to get on if you can send some info.

Thanks.

From: [REDACTED] <[REDACTED]@twitter.com>

Sent: Monday, May 10, 2021 3:02 PM

To: [REDACTED] <[REDACTED]@cdc.gov>

Cc: [REDACTED] <[REDACTED]@reingold.com>; [REDACTED] <[REDACTED]@reingold.com>; [REDACTED] <[REDACTED]@census.gov>; [REDACTED] <[REDACTED]@cdc.gov>

Subject: Re: COVID Misinformation

Hi [REDACTED] -

Thanks for sharing this - agree these are important trends to note; a quick scan shows that at least some of these have been previously reviewed and actioned. I will now ask the team to review the others.

[REDACTED] remind me: did you have a chance to enroll in our Partner Support Portal? In the future, that's the best way to get a spreadsheet like this reviewed.

Best,
[REDACTED]

On Mon, May 10, 2021 at 1:50 PM [REDACTED]@cdc.gov> wrote:

[REDACTED]

We wanted to point out two issues that we are seeing a great deal of misinfo about – vaccine shedding and microchips. The below are just some example posts. We do plan to post something shortly to address vaccine shedding and I can send that link soon. Our census team copied here, has much more info on it if needed.

Also, we are standing up a BOLO COVID misinformation meeting and inviting all tech platforms. We are shooting for 12pm EST on Friday for our first meeting. I'll include you on the invite but if you'd like to propose an alternative approach or would like to me include others, just let me know.

Thanks!

Post Text	Link
MAGNET STICKS TO AREA INJECTED BY THE VACCINE- ARE THE VACCINATED GETTING MICROCHIPPED? #justsayno	https
<p>The ex VP of Pfizer came out predicting that there will be a human depopulation of the vaccinated people in 2 years. An even shorter lifespan after the booster. He believes it's eugenics. Many scientists are corroborating this.</p> <p>I'll be alive!</p> <p>Experimental vaccines!</p>	https
THE BIG QUESTION IS WHY ARE THEY LYING...GOVERNMENTS SIGNED US AWAY TO NWO..DEPOPULATION..ALSO EXPERIMENTS IN AI..IN LAYMENS TERMS..TRYING TO TURN US INTO ROBOTS/ ANDROIDS....ALSO THEY WANT WORLD BANK OF OUR DNA .. VIA VAX	https
<p>Agreed. But if the science is being followed, there's an awful lot of evidence that the vax crowd are shedding...maybe the non-vaxxed are safer this way...thoughts</p> <p>@crislerwyo</p> <p>?</p>	https
COVID 'Vaccine Shedding', Evidence SARS-CoV-2 Spike Protein Can 'Alter Human Genes' & VAERS Truth	https
Thank Bill Gates for wanting depopulation. That's exactly what this vaccine is doing, and will continue to do over the next few years.	https
IM ALARMED BY THE AMOUNT OF WOMEN IN MY DM'S COMPLAINING ABOUT ABNORMAL BLEEDING AND MISCARRIAGES AFTER COMING IN CONTACT WITH SOMEONE WHOSE BEEN VACCINATED!!!!	https
Well hundreds of women on this page say they are having bleeding/ clotting after vaccination or that they bleed oddly being AROUND vaccinated women. Unconfirmed, needs more investigation. But lots of reports. COVID-19 Vaccine Side Effects	https

<p>[Links to: https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/]</p>	<p>https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/</p>
<p>So the #CDC now says that those who are "Fully Vaxed nated" can "Go outside & live freely" lol.. This is a joke .</p> <p>Quick questions for those who were experimented on I MEAN -Took the shot, what were the ingredients in it? You did ASK right? .. Also, do you know what SHEDDING is?</p>	<p>https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/</p>
<p>Here is the official Pfizer trail protocols Concerning shedding by the vaccinated Fertility (male and female) contraception to be compulsorily used because shedding Adverse events and serious adverse events reporting And much more Dangers ore known</p> <p>https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf</p>	<p>https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/</p>
<p>For those of you who have questions about Spiked Protein SHEDDING: Pfizer admits in its own mRNA vaxx trial documentation that non-vaxxed people can be ENVIRONMENTALLY EXPOSED to the shot's spike proteins by INHALATION or SKIN CONTACT.</p> <p>https://themostrbeautifulworld.com/blog/skin-contact-covid</p>	<p>https://themostrbeautifulworld.com/blog/skin-contact-covid</p>
<p>Pfizer acknowledges the existence of "SHEDDING" in their #mRNA vaccines, and is setting up this new trial to study these dangers.</p> <p>(Shedding is where unvaccinated people experience serious health issues just by being near to vaccinated people).</p> <p>https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf#page67</p>	<p>https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf#page67</p>



CAUTION: This message originated externally. Please use caution when clicking on links or opening attachments.

From: [REDACTED]@fb.com]
Sent: 5/24/2021 9:14:34 AM
To: [REDACTED]@cdc.gov]
CC: [REDACTED]@fb.com]
Subject: Re: Children & Teens vaccine info

I will track that down

On May 24, 2021, at 8:28 AM, [REDACTED]@cdc.gov> wrote:

[REDACTED] I believe Liz mentioned on the call she was going to update this list and send us another copy, you haven't seen that yet have you?

From: [REDACTED]@fb.com>
Sent: Wednesday, May 12, 2021 8:39 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>
Subject: Re: Children & Teens vaccine info

Thank you!

On May 12, 2021, at 8:38 PM, [REDACTED]@cdc.gov> wrote:

Just FYI, we have a great deal of new content posted. Also, some new info on myths your misinfo folks might be interested in.

- <!--[if !supportLists]--><!--[endif]--> **New web page:** [COVID-19 Vaccines for Children and Teens](#) provides information about the benefits of COVID-19 vaccines for adolescents aged 12 and older, how to find a vaccination provider for adolescents, and what to expect during and after vaccination.
- <!--[if !supportLists]--><!--[endif]--> **New fact sheet:** [COVID-19 Vaccines for Preteens and Teens](#) is a printable fact sheet for parents that explains the benefits of a COVID-19 vaccine for their children, safety information, and what to expect during and after vaccination. **New frequently asked questions:** Two [new FAQs](#) address questions about the safety and benefits of COVID-19 vaccination for adolescents aged 12 and older.
- <!--[if !supportLists]--><!--[endif]--> **New myth-buster about menstrual cycles:** Your menstrual cycle *cannot* be affected by being near someone who received a COVID-19 vaccine. This [question and answer](#) explains why.

- <!--[if !supportLists]--><!--[endif]-->**Myth-buster about infertility:** It is safe for people who would like to have a baby one day to get a COVID-19 vaccine. This [question and answer](#) explains why.
- <!--[if !supportLists]--><!--[endif]-->**Key things to know:** The web pages [Key Things to Know about COVID-19 Vaccines](#) and [About COVID-19 Vaccines](#) have been updated to include the recommendation that adolescents aged 12 and older get vaccinated.

<!--[if !supportLists]--><!--[endif]-->

Information for Healthcare and Vaccine Providers

- <!--[if !supportLists]--><!--[endif]-->**New pediatric toolkit:** The [Pediatric Healthcare Professionals COVID-19 Vaccination Toolkit](#) provides materials to help healthcare providers give parents clear and accurate information about COVID-19 vaccines. The toolkit includes answers to common questions, an explanation of how mRNA vaccines work, and printable materials to give to parents.
- <!--[if !supportLists]--><!--[endif]-->**New FAQs about consent for minors:** [FAQs](#) have been posted on the Pfizer-BioNTech product page for providers with information about consent, prescreening questions, and other issues related to the vaccination of minors.
- <!--[if !supportLists]--><!--[endif]-->**New sample patient letter:** Healthcare providers can customize and send this [sample letter](#) to encourage their patients to get a COVID-19 vaccine. It includes the new recommendation that everyone aged 12 and up get a COVID-19 vaccination.

Information for Community Groups and Health Departments

Toolkit for community-based organizations: The [Community-Based Organizations COVID-19 Vaccine Toolkit](#) has been updated to include information and resources on COVID-19 vaccination for adolescents aged 12 and older.



From: [REDACTED]@twitter.com]
Sent: 4/16/2021 8:35:22 AM
To: [REDACTED]@cdc.gov]
Subject: Re: Request for problem accounts

Hi [REDACTED]
Thank you so much for this; we actioned (by labeling or removing) the Tweets in violation of our Rules.
Warmest,
[REDACTED]

On Wed, Apr 14, 2021 at 3:16 PM [REDACTED]@cdc.gov> wrote:

The Census team put this spreadsheet together with four example areas. Is this what you had in mind?

- Vaccines aren't FDA approved
- Fraudulent cures
- VAERS data taken out of context
- Infertility

From: [REDACTED]@twitter.com>
Sent: Thursday, April 8, 2021 8:27 PM
To: [REDACTED]@cdc.gov>
Subject: Request for problem accounts

Hi [REDACTED]
I'm looking forward to setting up regular chats; my team has asked for examples of problematic content so we can examine trends. All examples of misinformation are helpful, but in particular, if you have any examples of fraud - such as fraudulent covid cures, fraudulent vaccine cards, etc, that would be very helpful.

Thanks in advance,
[REDACTED]

CAUTION: This message originated externally. Please use caution when clicking on links or opening attachments.

From: [REDACTED] (CDC/OD/OADC) [REDACTED]
Sent: 4/9/2021 2:14:25 PM
To: [REDACTED] [twitter.com]
Subject: RE: Request for problem accounts

Yes, we'll get that to you early next week. Thanks for checking in.

From: [REDACTED] [twitter.com]>
Sent: Thursday, April 8, 2021 8:28 PM
To: [REDACTED] [REDACTED]@cdc.gov>
Subject: Request for problem accounts

Hi [REDACTED]
I'm looking forward to setting up regular chats; my team has asked for examples of problematic content so we can examine trends. All examples of misinformation are helpful, but in particular, if you have any examples of fraud - such as fraudulent covid cures, fraudulent vaccine cards, etc, that would be very helpful.

Thanks in advance,
[REDACTED]

From: [REDACTED] (CDC/OD/OADC) [REDACTED]
[REDACTED]
Sent: 3/31/2021 2:23:11 PM
To: [REDACTED]@fb.com]
Subject: RE: This week's meeting

Got it, thanks.

From: [REDACTED]@fb.com>
Sent: Wednesday, March 31, 2021 2:18 PM
To: [REDACTED]@cdc.gov>
Subject: Re: This week's meeting

Hi [REDACTED]

We are working on a proposal of how set up sharing partnership on the misinform items...what it would look like.... so we can discuss Thursday.

Lots of team members out the last two weeks due to all the holidays, but that is the plan so we can discuss on the Thursday call.

From: [REDACTED]@cdc.gov>
Date: Wednesday, March 31, 2021 at 2:07 PM
To: [REDACTED]@fb.com>
Subject: RE: This week's meeting

Can you explain what you originally meant when you said this "will know in a few hours (I am told if we have a plan to present for Census Thursday or if it needs more work)". I'm still a bit confused.

But here is what Census mentioned that they would like to discuss:

- It looks like the posts from last week's deck about infertility and side effects have all been removed. Were those re-evaluated by the moderation team or taken down for another reason?
- One of the main themes we're seeing and from the CrowdTangle report is local news coverage of deaths after receiving the vaccine. What's the approach for adding labels to those stories?
 - [Example: No label](#)
 - [Example: Label that links to WHO](#)
- Can we add the Census team to CrowdTangle?
- How should we best engage regularly going forward on the Census/CDC reports.

Thanks.

From: [REDACTED]@fb.com>
Sent: Tuesday, March 30, 2021 7:46 PM
To: [REDACTED]@cdc.gov>
Subject: Re: This week's meeting

Hi [REDACTED]

Yes, I think good to have questions from Census so we make sure we have the right person.

I can ask [REDACTED] to join again so she can be asked questions/provide more information about influencers and I have noted your question about removals and will tee that up as well.

What you have below is a pretty full agenda so I will start to shape it based on what you have below.

From: [REDACTED] <[REDACTED]@cdc.gov>
Date: Tuesday, March 30, 2021 at 7:38 PM
To: [REDACTED] <[REDACTED]@fb.com>
Subject: RE: This week's meeting

The CDC team mentioned to me that they would like to have more info from [REDACTED] about what is being done on the amplification-side and gain a better understanding how FB is working with influencers. The team is still interested in more info on how you analyze the data on removals, etc. I didn't ask Census if they had questions...but I know they were hoping to go over the deck they had and discuss how to engage on a more regular basis. I'm not sure what you all are preparing for them? (that might have slipped my mind from last week, sorry if so).

Thanks!

From: [REDACTED] <[REDACTED]@fb.com>
Sent: Tuesday, March 30, 2021 3:16 PM
To: [REDACTED] <[REDACTED]@cdc.gov>
Subject: Re: This week's meeting

Hi [REDACTED]

Yes, I did see and will know in a few hours (I am told if we have a plan to present for Census Thursday or if it needs more work) and it would be great to have questions that may not have been answered from your team on misinfo. That team is very busy so it's a good opportunity to did deeper on that topic and especially if there are areas that are still unclear or the teams have concerns about.

I will stand by.

Best,
[REDACTED]

From: [REDACTED] <[REDACTED]@cdc.gov>
Date: Tuesday, March 30, 2021 at 3:08 PM
To: [REDACTED] <[REDACTED]@fb.com>
Subject: RE: This week's meeting

Hope all is well too. I plan to join and listen in to the 3:30 meeting, FYI.

I added this part in yellow to our chain on turn.io so you probably missed it, did you have thoughts on how we can regularly meet with Census? I will also check back with others to see if they have other Qs that that were unanswered and get back to you.

So in follow up to today's meeting -- besides discussing things in more depth next Thur, am I correct that your team is going to consider how you might want to engage with the CDC/Census team routinely and get back to us? I'd be fine with using our existing time for this regular discussion if that end up working out best. I don't quite have a good vision yet on how it will work but I know you all have experience with Census already.

From: [REDACTED]@fb.com>
Sent: Tuesday, March 30, 2021 2:42 PM
To: [REDACTED]@cdc.gov>
Subject: This week's meeting

Hi [REDACTED]

Hope all is well...as it can be. At least Spring is making an appearance.
I wanted to surface any misinfo questions your team may have for the team that I had briefing last time. They are available to attend again, but also want to make sure we are answering any of your team's questions.

Best,

[REDACTED]

FACEBOOK

[REDACTED]

From: [redacted] fb.com]
Sent: 2/3/2021 10:23:54 AM
To: [redacted] cdc.gov]; [redacted] fb.com]; [redacted]
[redacted] @fb.com]
Subject: Re: Imposter accounts of our new CDC Director

Yes! Please feel free to share my contact info.

[redacted]

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From: [redacted] cdc.gov>
Sent: Wednesday, February 3, 2021 10:21:07 AM
To: [redacted] fb.com>; [redacted] fb.com>; [redacted] fb.com>
Subject: RE: Imposter accounts of our new CDC Director

[redacted] -Thank you! Also, can I give your contact info to our security office for future emergencies or threats?

From: [redacted] fb.com>
Sent: Wednesday, February 3, 2021 10:16 AM
To: [redacted] fb.com>; [redacted] cdc.gov>; [redacted] @fb.com>
Subject: Re: Imposter accounts of our new CDC Director

Thanks for flagging, [redacted] These accounts have been removed.

Best,
[redacted]

Get [Outlook for iOS](#)

From: [redacted] fb.com>
Sent: Wednesday, February 3, 2021 1:09:07 AM
To: [redacted] cdc.gov>; [redacted] fb.com>; [redacted] @fb.com>
Subject: Re: Imposter accounts of our new CDC Director

Thanks for the flag [redacted]

I am adding [redacted] to help here.

Best,
[redacted]

From: [redacted] cdc.gov>
Date: Tuesday, February 2, 2021 at 6:28 PM

To: [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>

Subject: Imposter accounts of our new CDC Director

These new accounts have cropped up and [REDACTED] our new director, did not create them. Can you assist us in addressing this?

[REDACTED]

I wasn't clear if I should loop in [REDACTED] directly or if she was a contact I could provide to our security office for future reference.

Thank you.

From: [REDACTED]@google.com]
Sent: 7/24/2020 12:32:08 AM
To: [REDACTED]@cdc.gov]
CC: [REDACTED]@cdc.gov; [REDACTED]@google.com]
Subject: Re: Consolidating COVID Updates - feedback on vaccine doc

Thanks so much, [REDACTED]. This is very helpful and we'll be sure to reach out if we have more questions.

On Thu, Jul 23, 2020 at 4:27 PM [REDACTED]@cdc.gov> wrote:
Feedback from [REDACTED] on the vaccine document. Let me know if we need to connect folks again.

Overall the list seems very appropriate and reasonable and we concur with the statements being myths. However, there are a few statements that may be more nuanced.

- Vaccine trials are in fact trying to enroll ethnic minorities, pregnant women, and children and this could be viewed as "targeting". This is really not in the same category of misinformation, as vaccine trials will attempt to specifically enroll these groups to ensure a diverse population in which the vaccines are tested. We would recommend removing this from the list.
- The "vaccine being rushed" comment: This one is tricky as the first half of the statement appears to be more of an opinion (people have the right to express their concern that the development is being rushed). The 2nd half contains false information ('safety and ethical protocols not being followed'). We recommend separating these two statements.

Hope this helps.

From: [REDACTED]@google.com>
Sent: Wednesday, July 22, 2020 3:52 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@cdc.gov>; [REDACTED]@google.com>
Subject: Re: Consolidating COVID Updates


Hi [REDACTED],

Thanks for the Spanish translation feedback. I've shared the recommended change with our product team and the Spanish version should be live early next week. The YouTube banner should also be live by tomorrow and we'll keep an eye out for any feedback from [REDACTED].

One new update:

1. We are planning to launch a new COVID-19 patient journey which will provide a direct answer to users who are querying for a specific COVID-19 symptom (ex: "fever coronavirus" or "is headache a symptom of covid"). If the user queries for a COVID-19 symptom that matches one of the symptoms provided by the CDC in our [OSRP](#), we will serve the user with a direct answer (ex: "Fever is a possible symptom of covid-19"), suggest relevant next steps such as taking a self test (where available), and surface similar questions from the web instead of triggering the current COVID-19

OSRP's symptom's tab. Please note that the current COVID-19 OSRP will still surface for general COVID-19 queries. **Could you confirm if the CDC is comfortable with the phrasing, "X is a possible symptom of COVID-19" (screenshot below)?**

 The linked image cannot be displayed. The file may have been moved, renamed, or deleted. Verify that the link points to the correct file and location.

Thanks,
Stanley

On Wed, Jul 22, 2020 at 10:45 AM [REDACTED] <[REDACTED]@cdc.gov> wrote:

3. [REDACTED] said she'd get back to us soon
4. Feedback from translation team below:.

Their notes: I am not sure that this is the most accurate as it may mean: Get away from things that bother you.

I suggest to change to:

Tómate un descanso de la información que te afecta. (Take a break from the information that upsets you).

Take breaks from upsetting content

Make time to unwind. Try relaxation techniques and listening to music. Try to do some other activities you enjoy.

Aléjate de lo que te molesta

Dedica unos minutos a despejar la mente. Prueba con técnicas de relajación y escucha música. Intenta hacer otras actividades que disfrutas.

From: [REDACTED]@google.com>
Sent: Tuesday, July 21, 2020 6:56 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@cdc.gov> [REDACTED]@google.com>
Subject: Re: Consolidating COVID Updates

Perfect, thanks for the quick response!

On Tue, Jul 21, 2020 at 3:50 PM [REDACTED]@cdc.gov> wrote:

- 1/2 a&b –Everything looks great. Love the video. Thank you so much for all your work on this issue.
3. I sent to [REDACTED] but have not heard more. I'll get back to you tomorrow.
4. I'll also run this by our translation team in the morning and get back to you.

Thanks!


From: [REDACTED]@google.com>
Sent: Tuesday, July 21, 2020 5:57 PM
To: [REDACTED]@cdc.gov>; [REDACTED]
<[REDACTED]@cdc.gov>
Cc: [REDACTED]@google.com>
Subject: Consolidating COVID Updates

Hi [REDACTED],

Hope all is well. In an effort to save your inboxes, I'd like to consolidate updates across a few email threads here:

1. **Wear a Mask. Save Lives:** YouTube is looking to add similar "Wear a Mask. Save Lives" messaging in a visual banner and video clip (screenshot below):

a. Banner - YT plans to update the current general CDC banner that YT is promoting on the homepage to the copy below with the following text: "Face coverings can help reduce the spread of COVID-19"and link out to the same [CDC site](#) as the Wear a Mask campaign. **Please let us know if you have any feedback or concerns on the below mock that we plan to launch this Friday:**

 The linked image cannot be displayed. The file may have been moved, renamed, or deleted. Verify that the link points to the correct file and location.

- b. Video - YT also plans to include the link out to the [CDC.gov face covering page](#) on the following YouTube "[Wear a Mask](#)" video PSA. The link to the CDC page is in the video description, info card "i" in the upper right of the video and a companion banner that shows up when the video runs as an ad.
- 3. **COVID-19 Vaccine Claims:** As a follow up to our discussion with Cynthia on vaccine information, we shared a list of common vaccine misinformation claims. Could you share any feedback on the claims in the list (attached)?
- 4. **Mental Wellness on Search:** Given the positive response we've seen from this Be Kind to Your Mind mental wellness tips on the [Search "coping tab"](#), we plan to make the content available in Spanish language in the United States. Please let us know if the CDC is comfortable with the following Spanish translation:

English Text (Currently live)	Spanish Translation
<p>Be Kind to Your Mind</p> <p>Mental health problems are common. Here are ways to cope with stress and promote wellbeing.</p>	<p>Cuida tu mente</p> <p>Los problemas de salud mental son muy comunes. A continuación, encontrarás algunos consejos para reducir el estrés y promover el bienestar.</p>
<p>Pause. Breathe. Notice how you feel.</p> <p>Take slow deep breaths, stretch, or meditate.</p> <p>Observe your feelings and sensations without judgment. Instead of responding or reacting to those thoughts or feelings, note them, and then let them go.</p>	<p>Pausa. Respira. ¿Cómo te sientes?</p> <p>Respira lenta y profundamente, estírate o medita.</p> <p>Observa cómo te sientes y qué piensas, sin juzgar. En lugar de responder o reaccionar a esos pensamientos o sentimientos, asimíloslos y, luego, déjalos ir.</p>
<p>Take breaks from upsetting content</p> <p>Make time to unwind. Try relaxation techniques and listening to music. Try to do some other activities you enjoy.</p>	<p>Aléjate de lo que te molesta</p> <p>Dedica unos minutos a despejar la mente. Prueba con técnicas de relajación y escucha música. Intenta hacer otras actividades que disfrutes.</p>
<p>Take care of your body</p> <ul style="list-style-type: none"> • Exercise regularly. Even one session of moderate-to-vigorous physical activity reduces anxiety, and even short bouts of physical activity are beneficial. • Get plenty of sleep. Be consistent. Go to bed at the same time each night and get up at the same time each morning, including on the weekends • Try to eat healthy, well-balanced meals. Add healthy fats, cut sodium, bump up your fiber, and aim for a variety of colors on your plate. • Avoid alcohol and drugs. 	<p>Cuida tu cuerpo</p> <ul style="list-style-type: none"> • Haz ejercicio regularmente. Una sesión de actividad física moderada o vigorosa reduce la ansiedad. Incluso ejercitarte durante un breve período es beneficioso para la salud. • Duerme lo suficiente. Sé constante. Acuéstate a la misma hora todas las noches y levántate a la misma hora cada mañana, incluso los fines de semana. • Intenta comer comidas saludables y bien equilibradas. Agrega grasas saludables, reduce la cantidad de sodio, come más fibra e intenta que haya una gran variedad de colores en tu plato. • Evita consumir alcohol o drogas.

<p>Reach out and stay connected Talk with people you trust about your concerns and how you are feeling. Check in with your loved ones often. It can help you and your loved ones feel less lonely and isolated.</p>	<p>Comunicate y mantente conectado Habla con personas de confianza acerca de tus preocupaciones y sentimientos. También comunícate frecuentemente con tus seres queridos. De esa forma, todos se sentirán menos solos y aislados.</p>
<p>Seek help if overwhelmed or unsafe If you, or someone you care about, are feeling overwhelmed with emotions like sadness, depression, or anxiety, or feel like you want to harm yourself or others, seek professional help. If distress impacts activities of your daily life for several days or weeks, talk to a clergy member, counselor, or healthcare provider.</p>	<p>No te sientas agobiado ni inseguro Si tú o un ser querido se sienten agobiados por emociones como tristeza, depresión o ansiedad, o si sienten que quieren hacerse daño a sí mismos o a otros, busquen ayuda profesional. Si la angustia afecta las actividades diarias durante varios días o semanas, hablen con un clérigo, un terapeuta o un proveedor de atención médica.</p>

Thanks,

[Redacted]

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[Redacted]

[@google.com](#)

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[Redacted]

[@google.com](#)

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[Redacted]

[@google.com](#)

[Redacted]

[@google.com](#)

From: [REDACTED]@fb.com]
Sent: 3/5/2020 8:59:29 AM
To: [REDACTED]@cdc.gov]
Subject: Re: Facebook's COVID-19 Response Efforts

Hi and would be good to chat very soon.

On the FB live, should I reach out to [REDACTED] directly or do you want to connect us?

Best,

[REDACTED]

Sent from my iPhone

On Mar 5, 2020, at 8:55 AM, [REDACTED]@cdc.gov> wrote:

[REDACTED] - I missed this one Tuesday night. Can we get a short call with someone tomorrow? We want to do a very controlled Q&A and would like to know our best options.

Our Lead POCs is [REDACTED] at [REDACTED]@cdc.gov and she could talk directly to your team - I don't have to be a part of it.

Also, I know everyone else in Fed getting involved so let me know if we need to chat.

From: [REDACTED]@fb.com>
Sent: Tuesday, March 3, 2020 10:22 PM
To: [REDACTED]@cdc.gov>
Subject: Facebook's COVID-19 Response Efforts

Good evening [REDACTED]

Apologies for the late note. I want to ensure you are aware that [REDACTED] just [shared our ongoing work](#) to support governments and non-profits with their response efforts on COVID-19. Our goal is to help organizations to get their safety messages out to the public, remove misinformation, and support overall community efforts in areas where we can be of help.

If you have additional ideas not captured in the summary, please let me know.

Best,

[REDACTED]

<image001.gif>

[REDACTED]

Facebook

From: [REDACTED]@fb.com]
Sent: 7/20/2021 1:24:46 PM
To: Humphrey, Clarke E. [REDACTED]@who.eop.gov]; [REDACTED]@fb.com]
CC: Flaherty, Rob R. [REDACTED]@who.eop.gov]; [REDACTED]@niaid.nih.gov]
Subject: Re: Deactivating fake Fauci IG?

Yep, on it!

From: Humphrey, Clarke E. EOP/WHO [REDACTED]@who.eop.gov>
Date: Tuesday, July 20, 2021 at 1:24 PM
To: [REDACTED]@fb.com>, [REDACTED]@fb.com>
Cc: Flaherty, Rob R. [REDACTED]@who.eop.gov>, [REDACTED]@niaid.nih.gov>
Subject: Deactivating fake Fauci IG?

Hi there – any way we can get this pulled down? It is not actually one of ours:

<https://www.instagram.com/anthonyfauciofficial/>

Clarke Humphrey
Digital Director, COVID-19 Response Team
The White House
[REDACTED]

From: [redacted] fb.com]
Sent: 4/21/2020 2:48:52 PM
To: [redacted] nih.gov]; [redacted] fb.com]
CC: [redacted] nih.gov]; [redacted] nih.gov]; [redacted] nih.gov]; [redacted] nih.gov]; [redacted] nih.gov]; [redacted] nih.gov];
Subject: Re: Fake IG/Facebook accounts

[redacted]

Nice to meet you. The Politics and Government team actually supports our government agency partners in three ways:

- Product - training and best practices for Facebook/Instagram products
- Operations - providing support for things like imposter removal, verification, and access issues
- Strategic Partnerships - working to create exclusive moments on our platforms (events, etc.)

We have been working with [redacted] and others re: NIH social media presences on our platform. Please feel to flag to us the various imposter accounts or to their teams as well.

Best,
[redacted]



[redacted]

Politics & Government Outreach | Policy

Covid-19: Support & Resources

- Keeping People Safe And Informed About the Coronavirus. Click [here](#)
- Resources for Governments Responding to Coronavirus. Click [here](#)
- Facebook Local Covid-19 Information Center. Click [here](#)
- Messenger Government Services To Respond to Coronavirus Pandemic. Click [here](#)
- WhatsApp Coronavirus Information Hub for Government. Click [here](#)
- Instagram Government Covid-19 Toolkit, virtual guide & keep people safe. Click [here](#)
- School's Out Remote Resources. Click [here](#)
- CrowdTangle Covid-19 Visual Displays for Government. Click [here](#)

From: [redacted] nih.gov>
Date: Tuesday, April 21, 2020 at 2:33 PM
To: [redacted] fb.com>
Cc: [redacted] nih.gov> [redacted] nih.gov> [redacted] nih.gov> [redacted] nih.gov> [redacted] nih.gov> [redacted] nih.gov> [redacted] fb.com> [redacted] fb.com>
Subject: RE: Fake IG/Facebook accounts

Thank you, [redacted]

[REDACTED]—Great to connect with you, and thank you for the work that you’re doing. Our team will be sure to reach out if we identify any more impersonations. Please don’t hesitate to reach out if you have any questions.

Very best,

[REDACTED]
Technical Writer-Editor
National Institute of Allergy and Infectious Diseases
[REDACTED]

From: [REDACTED] fb.com>
Sent: Tuesday, April 21, 2020 2:31 PM
To: [REDACTED] nih.gov>
Cc: [REDACTED] nih.gov>; [REDACTED] nih.gov>; [REDACTED] nih.gov>; [REDACTED] nih.gov>; [REDACTED] nih.gov>; [REDACTED] fb.com>; [REDACTED] fb.com>
Subject: Re: Fake IG/Facebook accounts

Of course! And thank you all for flagging. Also want to intro you all to [REDACTED] who have been working hard to manage any fake accounts for NIH across the board. She can work with you directly if anything like this comes up.

Thanks all!

From: [REDACTED] nih.gov>
Date: Tuesday, April 21, 2020 at 11:18 AM
To: [REDACTED] fb.com>
Cc: [REDACTED] nih.gov>, [REDACTED] nih.gov>, [REDACTED] nih.gov>, [REDACTED] nih.gov>, [REDACTED] nih.gov>
Subject: RE: Fake IG/Facebook accounts

Many thanks [REDACTED]

From: [REDACTED] fb.com>
Sent: Tuesday, April 21, 2020 2:15 PM
To: [REDACTED] nih.gov>
Cc: [REDACTED] nih.gov>; [REDACTED] nih.gov>; [REDACTED] nih.gov>; [REDACTED] nih.gov>; Routh, [REDACTED] nih.gov>
Subject: Re: Fake IG/Facebook accounts

Hi all! Flagged this for the fake accounts team and they have confirmed that all but two accounts were removed for the impersonation of Dr. Fauci. I guess two of the accounts are fan accounts...

Let us know if you have any other issues and many thanks!

Cheers,

[Redacted]

From [Redacted] <[Redacted]@nih.gov>

Date: Tuesday, April 21, 2020 at 8:55 AM

To: [Redacted] <[Redacted]@fb.com>

Cc: [Redacted] <[Redacted]@nih.gov>, [Redacted] <[Redacted]@nih.gov>, [Redacted] <[Redacted]@nih.gov>, [Redacted] <[Redacted]@nih.gov>, [Redacted] <[Redacted]@nih.gov>, [Redacted] <[Redacted]@nih.gov>, [Redacted] <[Redacted]@nih.gov>

Subject: RE: Fake IG/Facebook accounts

Apologies one more: https://www.facebook.com/Dr-Anthony-Stephen-Fauci-101140431566203/?eid=ARCz3XjmJCp_Dn8FYIfCfJfhMKwFvXp6_iL8kQI5_vudxsLyCq-lGoG9q_ITclMnBu82aTg67z2q9SRf

[Redacted] for awareness.

From: [Redacted]

Sent: Tuesday, April 21, 2020 11:49 AM

To: [Redacted] <[Redacted]@b.com>

Cc: [Redacted] <[Redacted]@nih.gov>; [Redacted] <[Redacted]@nih.gov>; [Redacted] <[Redacted]@nih.gov>; [Redacted] <[Redacted]@nih.gov>; [Redacted] <[Redacted]@nih.gov>

Subject: Fake IG/Facebook accounts

Hi [Redacted]

We wanted to flag a few more fake Dr. Fauci accounts on FB and IG for you. I have also reported them from @niaid and my personal FB account.

This one is particularly troubling because they are selling masks: www.instagram.com/fauci_anthony/

<https://www.instagram.com/drfauci/>

<https://www.instagram.com/anthony.fauci/>

<https://www.instagram.com/dr.xanthonyfauci/>

<https://www.instagram.com/doc.fauci/>

https://www.facebook.com/Dr-Anthony-Stephen-Fauci-101078361574045/?ref=br_rs

https://www.facebook.com/Dr-Anthony-Fauci-102567911432644/?ref=br_rs

https://www.facebook.com/Dr.FauciTheHero/?ref=br_rs (I think this one may be fine as a fan page but could use a reminder to be a bit more clear.)

Thank you so much for your help, and I hope you are staying well!

[REDACTED]

[REDACTED]

Technical Writer-Editor
National Institute of Allergy and Infectious Diseases

[REDACTED]

We wanted to flag a few more fake Dr. Fauci accounts on FB and IG for you. I have also reported them from @niaid and my personal FB account.

This one is particularly troubling because they are selling masks: www.instagram.com/fauci_anthony/

<https://www.instagram.com/drfauci/>

<https://www.instagram.com/anthony.fauci/>

<https://www.instagram.com/dr.xanthonyfauci/>

<https://www.instagram.com/doc.fauci/>

https://www.facebook.com/Dr-Anthony-Stephen-Fauci-101078361574045/?ref=br_rs

https://www.facebook.com/Dr-Anthony-Fauci-102567911432644/?ref=br_rs

https://www.facebook.com/Dr.FauciTheHero/?ref=br_rs (I think this one may be fine as a fan page but could use a reminder to be a bit more clear.)

Thank you so much for your help, and I hope you are staying well!

[REDACTED]
[REDACTED]
[REDACTED]
Technical Writer-Editor
National Institute of Allergy and Infectious Diseases
[REDACTED]

From: [REDACTED] fb.com]
Sent: 7/17/2022 11:16:55 PM
To: Flaherty, Rob R. EOP/WHO [REDACTED] who.eop.gov]; Tim Manning [REDACTED] who.eop.gov]; Salcido, Dori A. EOP/WHO [REDACTED] who.eop.gov]; Cheema, Subhan N. EOP/WHO [REDACTED] who.eop.gov]
CC: [REDACTED] hhs.gov] [REDACTED] hhs.gov
Subject: Re: Covid Insights report
Attachments: 6_24_22 - COVID-19 Insights.pdf; 07_08_22 - COVID-19 Insights.pdf

Rob et all,

Including the most recent two reports here for your review. We'll have the next version ready for this Friday. Please let me know if you have any questions.

From: Flaherty, Rob R. EOP/WHO [REDACTED] who.eop.gov>
Date: Monday, June 13, 2022 at 6:11 PM
To: [REDACTED] fb.com>, Manning, Tim W. EOP/WHO <[REDACTED] who.eop.gov>, Salcido, Dori A. EOP/WHO [REDACTED] who.eop.gov>, Cheema, Subhan N. EOP/WHO [REDACTED] who.eop.gov>
Cc: [REDACTED] hhs.gov> [REDACTED] hhs.gov <[REDACTED] hhs.gov> [REDACTED] hhs.gov>
Subject: RE: Covid Insights report

Hey [REDACTED] – Thanks for these. I would normally say we are good to discontinue but it would be helpful to continue to get these as we start to ramp up under 5 vaccines. Obviously, that has a potential to be just as charged. Would love to get a sense of what you all are planning here. I'm also adding in Dori and Subhan who have replaced Courtney and Ben.

From: [REDACTED] fb.com>
Sent: Monday, June 13, 2022 3:27 PM
To: Rowe, Courtney M. EOP/WHO [REDACTED] who.eop.gov>; Wakana, Benjamin L. EOP/WHO [REDACTED] who.eop.gov>; Manning, Tim W. EOP/WHO [REDACTED] who.eop.gov>
Cc: Flaherty, Rob R. EOP/WHO [REDACTED] who.eop.gov>; [REDACTED] hhs.gov>; [REDACTED] hhs.gov
Subject: [EXTERNAL] Re: Covid Insights report

Hi all,

Attaching recent reports for your review. We will plan to discontinue these unless we hear from you that this information continues to be valuable. We're happy to continue, or to pick up at a later date, if circumstances warrant or if we hear from you that this continues to be of value. Providing a summary below from our team detailing the decrease in vaccine related posts we have seen over the past 6 months for further context.

Thanks and please let me know if you have any questions.

Over the last 6 months, there has been a noticeable decrease in top vaccine-related posts that were demoted as misinformation or for sharing misleading or sensationalized information about vaccines in

a way that would be likely to discourage vaccinations. There has not been a post misinforming or discouraging vaccination in this way in the top 100 vaccine-related posts since the week of February 27th, 2022, and the overall trend peak dates back to October of 2021. The total number of posts removed for violating our COVID-19 or vaccine misinformation policies has remained at 1 since the week of December 13th, 2021. We believe this trend will continue given the sustained low volumes of top-vaccine related posts despite the Omicron variant surge experienced in early 2022.

We recommend discontinuing this report as we are no longer seeing problematic vaccine related posts (Borderline Vaccine) in the top 100 posts viewed on FB in the US. Deprecation of this report will not impact existing enforcement measures or ongoing monitoring and reporting on the problem. Meta will continue to reduce the prevalence of this problem, and will reinstate the reports if events warrant.

From: [REDACTED] fb.com>

Date: Tuesday, May 3, 2022 at 3:51 PM

To: Rowe, Courtney M. EOP/WHO [REDACTED] who.eop.gov>, [REDACTED] who.eop.gov [REDACTED] who.eop.gov>, Manning, Tim W. EOP/WHO [REDACTED] who.eop.gov>

Cc: Flaherty, Rob R. EOP/WHO [REDACTED] who.eop.gov>, [REDACTED] [REDACTED] hhs.gov>, [REDACTED] hhs.gov [REDACTED] hhs.gov>

Subject: Covid Insights report

Attaching the past two reports for your review. These cover the periods from 3/20 through 4/16. Also flagging that it would help to hear from you if these reports continue to provide useful context or if you'd like to follow up with a discussion as to how we can be helpful during this phase of the pandemic. We filed a response to the Surgeon General's rfi on Covid misinformation and would be happy to discuss at the appropriate time.

Thanks,

From: [REDACTED] fb.com>

Date: Monday, April 4, 2022 at 2:48 PM

To: Rowe, Courtney M. EOP/WHO [REDACTED] who.eop.gov>, [REDACTED] who.eop.gov [REDACTED] who.eop.gov>, Manning, Tim W. EOP/WHO [REDACTED] who.eop.gov>

Cc: Flaherty, Rob R. EOP/WHO [REDACTED] who.eop.gov>, [REDACTED] [REDACTED] hhs.gov>, [REDACTED] hhs.gov [REDACTED] hhs.gov>

Subject: Re: Covid Insights report -

Attached is the most recent Insights report. Toplines are below as well.

Given the shifting dynamics of the pandemic, it would help to understand if these reports are still useful or if we should rethink the cadence of our sending this information. Any objections to scaling back to a monthly report? If folks find the biweekly cadence useful we are happy to keep it up, just want to be responsive to your interests.

Thanks—and please let me know if you have any other feedback that we should consider.

Below is what we are seeing in the top 100 most viewed overall posts on Facebook in the US, as well as the top vaccine related posts on Facebook in the US for the weeks of 03/06/22 - 03/12/22 and 03/13/22 - 03/19/22.

As before, this report is focused on top vaccine related posts only. We're continuing to investigate and build analysis around content that isn't captured in this report. Again, the analysis provided below may be subject to other methodological challenges or errors - e.g., the specific rank number may not be exact.

1. Top 100 overall posts on FB in the U.S.

When looking at the overall top 100 posts viewed on Facebook in the United States during the week of 03/06/22 - 03/12/22, we see 0 pieces of content were specifically related to vaccine content.

When looking at the overall top 100 posts viewed on Facebook in the United States during the week of 03/13/22 - 03/19/22, we see that 0 pieces of content were specifically related to vaccine content.

Top 100 vaccine-related posts on FB in the U.S.

Of the Top 100 vaccine-related posts viewed on Facebook in the United States during the week of 03/06/22 - 03/12/22:

1. 0 posts were deleted for violating our COVID-19 and vaccine policies.
2. 0 posts were labeled by third-party fact-checkers for "missing context".
3. 0 posts were labeled and demoted upon review.

Of the Top 100 vaccine-related posts viewed on Facebook in the United States during the week of 03/13/22 - 03/19/22:

1. 0 posts were deleted for violating our COVID-19 and vaccine policies
2. 0 posts were labeled and demoted by third-party fact checkers
3. 1 post was labeled and demoted for sensationalist content about the number of vaccine doses that will be recommended in future.

From: [REDACTED] fb.com>

Date: Monday, March 28, 2022 at 2:26 PM

To: Rowe, Courtney M. EOP/WHO [REDACTED] who.eop.gov>, [REDACTED] who.eop.gov [REDACTED] who.eop.gov>, Manning, Tim W. EOP/WHO [REDACTED] who.eop.gov>

Cc: Flaherty, Rob R. EOP/WHO [REDACTED] who.eop.gov>, [REDACTED] [REDACTED] hhs.gov>, [REDACTED] hhs.gov [REDACTED] hhs.gov>

Subject: Re: Covid Insights report -

Sending the latest version of our insights report. Please let me know if you have any questions.

[REDACTED]  Meta

US Public Policy

[REDACTED]

From: [REDACTED] fb.com>

Date: Wednesday, February 23, 2022 at 3:32 PM

To: Rowe, Courtney M. EOP/WHO [REDACTED] who.eop.gov>, [REDACTED] who.eop.gov [REDACTED] who.eop.gov>, Manning, Tim W. EOP/WHO [REDACTED] who.eop.gov>

Cc: Flaherty, Rob R. EOP/WHO [REDACTED] who.eop.gov>, [REDACTED]

[REDACTED]@hhs.gov>, [REDACTED]@hhs.gov [REDACTED]@hhs.gov>

Subject: Covid Insights report -

Sending the latest Covid Insights Report—please let us know if you have any questions.

Thanks and have a good week.

[REDACTED] |  **Meta**
US Public Policy



From: Flaherty, Rob EOP/WHO [redacted]@who.eop.gov]
Sent: 4/16/2021 4:25:15 PM
To: Flaherty, Rob EOP/WHO [redacted]@who.eop.gov]; Slavitt, Andrew M. EOP/WHO [redacted]@who.eop.gov]; [redacted]@twitter.com]; [redacted]@twitter.com]; [redacted]@twitter.com
CC: Fitzpatrick, Kelsey V. EOP/WHO [redacted]@who.eop.gov]; [redacted] (HHS/OASH) [redacted]@hhs.gov]
Subject: Twitter Vaccine Misinfo Briefing
Location: [redacted]
Start: 4/21/2021 2:00:00 PM
End: 4/21/2021 3:00:00 PM
Show Time As: Tentative

Recurrence: (none)

White House Staff will be briefed by Twitter on vaccine misinfo. Twitter to covertrends seen generally around vaccine misinformation, the tangible effects seen from recent policy changes, what interventions are currently being implemented in addition to previous policy changes, and ways the White House (and our COVID experts) can partner in product work.



Hi there,

[redacted] is inviting you to a scheduled ZoomGov meeting.

[Join Zoom Meeting](#)

Phone US: [redacted] or
 one-tap: [redacted]
 Meeting [redacted]
 URL:
 Meeting [redacted]
 ID: [redacted]
 Passcode: [redacted]

Join by Telephone

For higher quality, dial a number based on your current location.

Dial:
 US: [redacted]

Elections Misinformation Reporting Portal

Benefits to election officials

- A single place (i.e., the portal) for reporting mis- and disinformation across multiple social media platforms with a streamlined, consistent user experience.
- An ability to report activity that occurs on multiple platforms at the same time.
- Visibility of what's going on with mis- and disinformation in the election's community within and outside their jurisdictions, including to see trends and be able to strategically respond.

Benefits to social media platforms

- Consistent reports of mis- and disinformation that include a standard, consistently formatted set of information fields (type of report, screenshots, links, as well as narrative explanation of the concern).
- An ability to accept reports without having to vet the submitter, as those submitters will already be vetted by the election's community upon registration in the portal. This will enable them to respond more quickly to a given election official's first report.

Benefits to state-level elections offices and national associations (NASS, NASED)

- The ability to look across the elections jurisdictions to identify patterns and potential impact of misinformation activity. This will permit national-level organizations to help put priority on response actions and make decisions regarding media engagement in parallel with actions taken by the social media companies.
- An opportunity to focus efforts at the national level to improve the overall health of the election administration across the country.
- Redirecting resources spent on assisting election offices with reporting to those focused on remediation activities.

Benefits to voters

- More accurate election information available at any given time
- More rapid correction of erroneous information, leading to more voter confidence
- An overall healthier, more productive social media environment.



CISA CYBERSECURITY ADVISORY COMMITTEE

Protecting Critical Infrastructure from Misinformation & Disinformation

The core of CISA's mission is to safeguard American's critical infrastructure. The nation has seen the corrosive effects of mis-, dis-, and mal-information (MDM) across a host of our critical infrastructure in recent years, impacting our election systems, telecommunications infrastructure, and our public health infrastructure. As there is no shortage of entities working on MDM issues, CISA is evaluating how to best engage in the space in an additive way, while safeguarding our credibility as an independent agency ahead of the next election cycle.

- **Where We Are.** CISA has a burgeoning MDM effort that focuses on building national resilience through public awareness. CISA engages with subject matter experts—researchers, think tanks, and public relations experts—to understand the threat of MDM, develop strategies to message to the public, and amplify trusted voices. These actions include directly engaging with social media companies to flag MDM, and creating a repository of factual guides and toolkits.
- **New Initiatives.** CISA is bringing on staff to address MDM related to the pandemic and incorporate lessons learned into longer-term strategies, as well as improving our ability to do analytics on narrative intervention. We are also working with federal partners to mature a whole-of-government approach to mitigating risks of MDM, framing which tools, authorities, and interventions are appropriate to the threats impacting the information environment.
- **Where We Want to Go in 2022.** Ahead of midterm elections in 2022, it will be critical to evaluate CISA's role in this space and ensure that the agency is providing additive value that fits within its unique capabilities and mission. One approach is to recognize CISA's responsibility for securing our election infrastructure – and ensuring CISA is a trusted resource in providing education on election processes and procedures to minimize misunderstanding and opportunities for MDM. CISA also wants to ensure it is set up to extract lessons learned from 2022 and apply them to the agency's work in the 2024.

Questions for the Committee

1. What should CISA's role be in the MDM space? How should it leverage its unique capabilities and mission to contribute to this space, without becoming duplicative of other efforts and remaining focused on its mission?
2. How would the Committee balance CISA's efforts between the need to build resilience to MDM, broadly, versus activities to address to MDM narratives, specifically? This distinction can be understood as broad public education and awareness campaigns versus rumor control, amplifying credible information, type efforts.
3. How can CISA inspire innovators to partner with the government in a way that catalyzes availability of trusted information without being seen as government "propaganda"?
4. What is the right model for CISA engagement with social media and other media entities?
5. How should CISA and the USG maintain situational awareness of MDM and detect efforts to manipulate the information environment? What is the balance between social listening, privacy, and protected speech?

From: [REDACTED]@reingold.com]
Sent: 5/24/2021 2:28:00 PM
To: [REDACTED]@twitter.com
CC: [REDACTED]@cdc.gov]; [REDACTED]@reingold.com]; [REDACTED]
[REDACTED]@cdc.gov]
Subject: RE: COVID Misinformation

Hi [REDACTED],

I hope you had a good weekend. I'm following up about the partner support portal enrollment for CDC. Does the Twitter account need to be connected to a cdc.gov email or is any account fine? Also, would there be any issues or complications stemming from flagging COVID misinformation on the portal using the existing census.gov accounts that have access? We'll want to have at least some CDC accounts whitelisted, but that backup may be helpful in the short-term.

Let us know any next steps we can take to make sure CDC is all set with the portal.

Thanks,

[REDACTED]
Reingold
[REDACTED]

reingold.com

We're on a mission. **Yours.**

From: [REDACTED] (CDC/OD/OADC)
Sent: Tuesday, May 11, 2021 8:50 AM
To: [REDACTED]@twitter.com>
Subject: RE: COVID Misinformation

Does it need to be the CDC account or my personal? If CDC, I'm going to have someone on staff enroll instead of me.

If personal is OK, it is: @[REDACTED]

From: [REDACTED]@twitter.com>
Sent: Monday, May 10, 2021 8:51 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@reingold.com>; [REDACTED]@reingold.com>; [REDACTED]
[REDACTED]@census.gov>; [REDACTED]@cdc.gov>
Subject: Re: COVID Misinformation

Hi [REDACTED]-

I'd be glad to enroll you in our Partner Support Portal, which allows you a special, expedited reporting flow in the Twitter Help Center. It worked very well with Census colleagues last year.

You need a Twitter account (and to be logged into that account) to access the Partner Support Portal. What account (or accounts) would you like me to enroll?

Best,

On Mon, May 10, 2021 at 5:05 PM [REDACTED] <[\[REDACTED\]@cdc.gov](mailto:[REDACTED]@cdc.gov)> wrote:

[REDACTED] - I don't think we have info on how to enroll but we'd be happy to get on if you can send some info.

Thanks.

From: [REDACTED] <[\[REDACTED\]@twitter.com](mailto:[REDACTED]@twitter.com)>

Sent: Monday, May 10, 2021 3:02 PM

To: [REDACTED] <[\[REDACTED\]@cdc.gov](mailto:[REDACTED]@cdc.gov)>

Cc: [REDACTED] <[\[REDACTED\]@reingold.com](mailto:[REDACTED]@reingold.com)>; [REDACTED] <[\[REDACTED\]@reingold.com](mailto:[REDACTED]@reingold.com)>; [REDACTED] <[\[REDACTED\]@census.gov](mailto:[REDACTED]@census.gov)>; [REDACTED] <[\[REDACTED\]@cdc.gov](mailto:[REDACTED]@cdc.gov)>

Subject: Re: COVID Misinformation

H [REDACTED] -

Thanks for sharing this - agree these are important trends to note; a quick scan shows that at least some of these have been previously reviewed and actioned. I will now ask the team to review the others.

[REDACTED] remind me: did you have a chance to enroll in our Partner Support Portal? In the future, that's the best way to get a spreadsheet like this reviewed.

Best,

On Mon, May 10, 2021 at 1:50 PM [REDACTED] <[\[REDACTED\]@cdc.gov](mailto:[REDACTED]@cdc.gov)> wrote:

[REDACTED] -

We wanted to point out two issues that we are seeing a great deal of misinfo about - vaccine shedding and microchips. The below are just some example posts. We do plan to post something shortly to address vaccine shedding and I can send that link soon. Our census team copied here, has much more info on it if needed.

Also, we are standing up a BOLO COVID misinformation meeting and inviting all tech platforms. We are shooting for 12pm EST on Friday for our first meeting. I'll include you on the invite but if you'd like to propose an alternative approach or would like to me include others, just let me know.

Thanks!

Post Text	Link
<p>MAGNET STICKS TO AREA INJECTED BY THE VACCINE- ARE THE VACCINATED GETTING MICROCHIPPED? #justsayno</p>	<p>https://t</p>
<p>The ex VP of Pfizer came out predicting that there will be a human depopulation of the vaccinated people in 2 years. An even shorter lifespan after the booster. He believes it's eugenics. Many scientists are corroborating this.</p> <p>I'll be alive!</p> <p>Experimental vaccines!</p>	<p>https://t</p>
<p>THE BIG QUESTION IS WHY ARE THEY LYING...GOVERNMENTS SIGNED US AWAY TO NWO..DEPOPULATION..ALSO EXPERIMENTS IN AI..IN LAYMENS TERMS..TRYING TO TURN US INTO ROBOTS/ ANDROIDS....ALSO THEY WANT WORLD BANK OF OUR DNA .. VIA VAX</p>	<p>https://t</p>
<p>Agreed. But if the science is being followed, there's an awful lot of evidence that the vax crowd are shedding...maybe the non-vaxxed are safer this way...thoughts</p> <p>@crislerwyo</p> <p>?</p>	<p>https://t</p>
<p>COVID 'Vaccine Shedding', Evidence SARS-CoV-2 Spike Protein Can 'Alter Human Genes' & VAERS Truth</p>	<p>https://t</p>
<p>Thank Bill Gates for wanting depopulation. That's exactly what this vaccine is doing, and will continue to do over the next few years.</p>	<p>https://t</p>
<p>IM ALARMED BY THE AMOUNT OF WOMEN IN MY DM'S COMPLAINING ABOUT ABNORMAL BLEEDING AND MISCARRIAGES AFTER COMING IN CONTACT WITH SOMEONE WHOSE BEEN VACCINATED!!!!</p>	<p>https://t</p>
<p>Well hundreds of women on this page say they are having bleeding/ clotting after vaccination or that they bleed oddly being AROUND vaccinated women. Unconfirmed, needs more investigation. But lots of reports. COVID-19 Vaccine Side Effects</p>	<p>https://t</p>
<p>[Links to: https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/]</p>	<p>https://t</p>
<p>So the #CDC now says that those who are "Fully Vaxxinated" can "Go outside & live freely" lol.. This is a joke</p> <p>Quick questions for those who were experimented on I MEAN -Took the shot, what were the ingredients in it? You did ASK right? .. Also, do you know what SHEDDING is?</p>	<p>https://t</p>
<p>Here is the official Pfizer trial protocols Concerning shedding by the vaccinated Fertility (male and female) contraception to be compulsorily used because shedding Adverse events and serious adverse events reporting And much more Dangers ore known</p>	<p>https://t</p>

https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf

For those of you who have questions about Spiked Protein SHEDDING: Pfizer admits in its own mRNA vaxx trial documentation that non-vaxxed people can be ENVIRONMENTALLY EXPOSED to the shot's spike proteins by INHALATION or SKIN CONTACT.

<https://t>

<https://themostrbeautifulworld.com/blog/skin-contact-covid>

Pfizer acknowledges the existence of "SHEDDING" in their #mRNA vaccines, and is setting up this new trial to study these dangers.

<https://t>

(Shedding is where unvaccinated people experience serious health issues just by being near to vaccinated people).

https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf#page67



CAUTION: This message originated externally. Please use caution when clicking on links or opening attachments.

Sent: 10/27/2020 4:25:44 PM
To: [redacted] twitter.com]; [redacted] twitter.com]; [redacted]
[redacted] twitter.com]
CC: [redacted] hq.dhs.gov]; [redacted] cisaecurity.org
Subject: FW: Flagging Three Twitter Accounts Impersonating Colorado Government

Please see below report from Colorado. I've asked them if these accounts have already been reported, but these are screenshots from today.

Regards,
[redacted]

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From: [redacted] SOS.STATE.CO.US>
Sent: Tuesday, October 27, 2020 4:17 PM
To: [redacted] cisaecurity.org; [redacted] cisa.dhs.gov> [redacted]
[redacted] cisa.dhs.gov>
Cc: [redacted] SOS.STATE.CO.US> [redacted] SOS.STATE.CO.US>; [redacted]
[redacted] SOS.STATE.CO.US>; [redacted] SOS.STATE.CO.US> [redacted]
[redacted] SOS.STATE.CO.US>; [redacted] SOS.STATE.CO.US> [redacted]
[redacted] SOS.STATE.CO.US>; [redacted] SOS.STATE.CO.US>; [redacted]
[redacted] SOS.STATE.CO.US>; [redacted] SOS.STATE.CO.US>; [redacted]
[redacted] SOS.STATE.CO.US>; [redacted] HQ.DHS.GOV>; [redacted]
[redacted] state.co.us>; [redacted] paletheagroup.com>; [redacted] srg.com>;
[redacted] state.co.us>; [redacted] state.co.us>; [redacted]
[redacted]@state.co.us>; [redacted] SOS.STATE.CO.US>
Subject: Flagging Three Twitter Accounts Impersonating Colorado Government

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EI-ISAC and CISA Partners,

Three Twitter accounts [redacted] popped up in the last couple of weeks impersonating the Colorado state government. As you may be aware, numerous other similar accounts have also been created impersonating other state and city jurisdictions in recent weeks. The MS-ISAC flagged a couple of them last week ([redacted]) but we don't know if the third one ([redacted]) is on everyone's radar. Has anyone engaged Twitter about these? Welcome any additional information you have.

These are concerning to us here in Colorado because of the recent FBI/CISA warnings about impersonation accounts spreading false information about the election. For the Colorado accounts:

- All three joined Twitter this month – October 2020
- All three have a URL link prominently labeled “Colorado.gov” that takes users to the official Colorado.gov website after passing through several other systems that could be harvest data or be more nefarious.
- All follow/are followed by up to a couple dozen other state/local government impersonation accounts – many also created recently.
- Several look like they were temporarily suspended by Twitter but at least some appear to be back online.

Below are screenshots taken today of the three accounts:





⋮ Follow



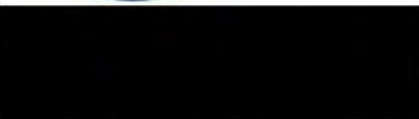
Smoke weed erry day. The official (unofficial) Twitter account of the State of Colorado.

📍 Colorado, USA colorado.gov 📅 Joined October 2020

21 Following 27 Followers



⋮ Follow



The (UN)official Colorado Twitter Account. This is a parody account.

📍 Colorado colorado.gov 📅 Joined October 2020

12 Following 56 Followers

Disclaimer: Colorado Department of State is not the originator of the above information and is forwarding it, unedited, from its original source. The Department does not seek the ability to remove or edit what information is made available

on social media platforms. The Department makes no recommendations about how the information it is sharing should be handled or used by recipients of this email. The Department may also share this information with local, state, and federal government agencies.



From: [REDACTED]@twitter.com]
Sent: 10/29/2020 2:52:23 PM
To: [REDACTED]@cisa.dhs.gov]
CC: [REDACTED]@twitter.com]; [REDACTED]@twitter.com]; [REDACTED]@hq.dhs.gov]; [REDACTED]@cisecurity.org
Subject: Re: FW: Case #CIS-MIS000090: potential parody Twitter accounts related to Adams County, CO

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

We will escalate. Thank you.

On Thu, Oct 29, 2020 at 2:37 PM [REDACTED]@cisa.dhs.gov> wrote:

Please see the below reporting from Colorado. These do not appear to be connected to the imposter/parody accounts previously shared.

Regards,
[REDACTED]

The Cybersecurity and Infrastructure Security Agency (CISA) of the U.S. Department of Homeland Security (DHS) is not the originator of this information. CISA is forwarding this information, unedited, from its originating source – this information has not been originated or generated by CISA. This information may also be shared with law enforcement or intelligence agencies.

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In the event that CISA follows up to request further information, such a request is not a requirement or demand. Responding to this request is voluntary and CISA will not take any action, favorable or unfavorable, based on decisions about whether or not to respond to this follow-up request for information.

From: [REDACTED]@cisecurity.org>
Sent: Thursday, October 29, 2020 2:33 PM
To: [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>; [REDACTED]@hq.dhs.gov>; [REDACTED]@2020partnership.atlassian.net; [REDACTED]@cisecurity.org>
Subject: Case #CIS-MIS000090: potential parody Twitter accounts related to Adams County, CO

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Misinformation report: two potential parody Twitter accounts related to Adams County, CO

From: [REDACTED] [cisa.dhs.gov]
Sent: 10/23/2020 6:06:42 PM
To: [REDACTED] [twitter.com]
CC: [REDACTED] [cisa.dhs.gov]; [REDACTED] [twitter.com]; [REDACTED] [twitter.com]; [REDACTED] [hq.dhs.gov]
Subject: Re: Case #CIS-MIS000062: Misinformation regarding trading in ballots at an in-person voting center

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Thank you, [REDACTED]

On Oct 23, 2020, at 6:05 PM, [REDACTED] [twitter.com] wrote:

Thank you for raising this to our teams. We have actioned these accounts under our civic integrity policy.

Thanks,
[REDACTED]

On Fri, Oct 23, 2020 at 9:57 AM [REDACTED] [cisa.dhs.gov] wrote:

Please see the below reporting from Maryland.

Thanks,
[REDACTED]

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From: [REDACTED] [cisa.dhs.gov]
Sent: Friday, October 23, 2020 9:51 AM

To: S [redacted] cisa.dhs.gov>; [redacted] cisa.dhs.gov>; [redacted]
<[redacted]hq.dhs.gov>; [redacted]2020partnership.atlassian.net; [redacted]
[redacted]@cisecurity.org>
Subject: Case #CIS-MIS000062: Misinformation regarding trading in ballots at an in-person voting center

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Misinformation tweet regarding trading in ballots at an in-person voting center

From: [redacted] maryland.gov>
Sent: Friday, October 23, 2020 9:39 AM
To: T [redacted] zerofox.com>; [redacted] cisecurity.org>; [redacted]
[redacted] twitter.com>; [redacted] fbi.gov; [redacted] oag.state.md.us>;
[redacted] twitter.com
Cc: [redacted] maryland.gov>; [redacted]
[redacted] maryland.gov>; [redacted] maryland.gov>; [redacted]
[redacted] maryland.gov>; [redacted] maryland.gov>; [redacted]
[redacted] maryland.gov>
Subject: Misinformation Report

Please see the following screenshot below posted 6 times to our official Maryland State Board of Elections Twitter handle, [redacted] at the following URLs. We have reported these tweets to Twitter for containing election misinformation.

Maryland voters cannot surrender or trade-in ballots at in-person vote centers. Any voters who requested or received a mail-in ballot wanting to vote in-person will have to vote provisionally.



[REDACTED]

HIDING INFO FROM VOTERS.TAKE UR MAIL IN WITH YOU TO THE POLLS, "SURRENDER" IT AND ASK FOR A REAL BALLOT....NOT A PROVISIONAL ONE. ALL VOTERS ARE FORCED TO VOTE PROVISIONAL UNLESSSSSS YOU TURN IN YOUR MAIL IN TO THE POLL WORKERS! IT'S A SCAM THEY DONT TELL YOU!DONT WANT U TO KNOW

Thank you,

[REDACTED]



.....

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.....

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From: [REDACTED]@twitter.com]
Sent: 10/22/2020 3:46:12 PM
To: [REDACTED]@cisa.dhs.gov]
CC: [REDACTED]@twitter.com]; [REDACTED]@twitter.com]; [REDACTED]@hq.dhs.gov]
Subject: Re: FW: Case #CIS-MIS000058: Live canvass video on Twitter

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Thanks, [REDACTED] We will escalate for review.

Thanks,
[REDACTED]

On Thu, Oct 22, 2020 at 12:33 PM Scully, [REDACTED]@cisa.dhs.gov> wrote:
Please see below report from Maryland.

Thanks,
[REDACTED]

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From: [REDACTED]@ciscure.org>
Sent: Thursday, October 22, 2020 12:02 PM
To: [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>; [REDACTED]@hq.dhs.gov>; [REDACTED]@2020partnership.atlassian.net; [REDACTED]@ciscure.org>
Subject: Case #CIS-MIS000058: Live canvass video on Twitter

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

CONFIDENTIAL

Please see the report below from Maryland which includes an analysis from ZeroFox. Please also see the statement from the Montgomery County Board of Elections (https://twitter.com/md_sbe/status/1319260743850708992). https://montgomerycountymd.gov/Elections/Resources/Files/pdfs/Press%20Release/2020/CNVSS_ENG_102120.pdf

Best,

Election Infrastructure Information Sharing and Analysis Center

Center for Internet Security

[Redacted]

www.cisecurity.org

Follow us @CISecurity

From: [Redacted] [\[Redacted\]@maryland.gov](mailto:[Redacted]@maryland.gov)>

Sent: Thursday, October 22, 2020 11:27 AM

To: [Redacted] [\[Redacted\]@fbi.gov](mailto:[Redacted]@fbi.gov)>; [Redacted]

[Redacted] [\[Redacted\]@cisecurity.org](mailto:[Redacted]@cisecurity.org)>; [Redacted] [\[Redacted\]@fbi.gov](mailto:[Redacted]@fbi.gov)

Subject: Fwd: Live Canvass Video on Twitter

Please see the analysis from our social media monitoring vendor below regarding propagation of misinformation related to a video showing ballot marking in a voting center in Montgomery County, MD.

Please contact me if you have any questions.

----- Forwarded message -----

From: [Redacted] [\[Redacted\]@zerofox.com](mailto:[Redacted]@zerofox.com)>

Date: Thu, Oct 22, 2020 at 10:35 AM

Subject: Re: Live Canvass Video on Twitter

To: [Redacted] [\[Redacted\]@maryland.gov](mailto:[Redacted]@maryland.gov)>

Cc: [Redacted] [\[Redacted\]@zerofox.com](mailto:[Redacted]@zerofox.com)>, [Redacted] [\[Redacted\]@maryland.gov](mailto:[Redacted]@maryland.gov)>, [Redacted] [\[Redacted\]@maryland.gov](mailto:[Redacted]@maryland.gov)>, [Redacted] [\[Redacted\]@zerofox.com](mailto:[Redacted]@zerofox.com)>, [Redacted] [\[Redacted\]@zerofox.com](mailto:[Redacted]@zerofox.com)>, [Redacted] [\[Redacted\]@zerofox.com](mailto:[Redacted]@zerofox.com)>

Hi [Redacted]

After additional analysis of this tweet as well as the networks of accounts retweeting it, we believe this content is likely being artificially spread by coordinated inauthentic behavior. The speed at which the video spread and the number of suspicious accounts that have retweeted the video are consistent with a coordinated inauthentic behavior rather than organic viral activity. It is likely that the coordinators of this activity were taking advantage of the livestream video opportunistically, rather than explicitly targeting the Maryland elections operations.

We believe the origin of the video to be the tweet from [REDACTED] and received over 7,000 retweets despite having less than 1,800 followers. Additionally, the [REDACTED] account [REDACTED] is also responsible for a considerable amount of the content's reach with more than 3,000 retweets albeit with a considerably larger follower base in excess of 42,000 followers. The large number of retweets [REDACTED]'s tweet received is abnormal compared to other tweeted content prior to the Montgomery County video. Furthermore, these two accounts do not appear to follow each other; however, they have 34 common followers, most of which display characteristics of inauthentic accounts. Automated or inauthentic behavior is generally characterized by:

- Recently created
- No profile image
- Excessive use of emojis and hashtags in bios
- Tweet counts not commensurate with account creation dates

We recommend sharing the joint inauthentic accounts with your Federal law enforcement partners to cross-reference their data. We've also attached a list of the accounts commonly connected between [REDACTED] and [REDACTED] for further cross-reference.

It's possible we could attempt takedown requests for these two tweets that seemingly drove a lot of the reach with this video. Due to the characteristics of disinformation, it's possible Twitter would be compelled to review the case carefully. However, there is at least some possibility that if these tweets are removed, it will be leveraged in disinformation suggesting censorship or further propagating conspiracy theories.

Let us know if you would like us to take further action or conduct additional research. We will be sure to incorporate these findings into our EoW report for posterity.

Thanks,

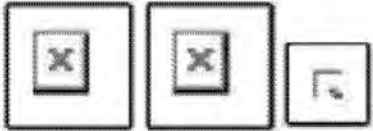
On Wed, Oct 21, 2020 at 9:15 AM [REDACTED] <[REDACTED]@maryland.gov> wrote:

FYI

On Wed, Oct 21, 2020 at 8:41 AM [REDACTED] <[REDACTED]@maryland.gov> wrote:

I sent this one to [REDACTED] and [REDACTED] yesterday. It has been liked and shared 11k times: [REDACTED]

[REDACTED]



----- Forwarded message -----

From: [REDACTED]@montgomerycountymd.gov>

Date: Tue, Oct 20, 2020 at 6:58 PM

Subject: Re: Live Canvass Video on Twitter

To: [REDACTED]@maryland.gov>

Cc: [REDACTED]@maryland.gov>, [REDACTED]@maryland.gov>, [REDACTED]@maryland.gov>, [REDACTED]@maryland.gov>, [REDACTED]@montgomerycountymd.gov>

Will interview this gentleman tomorrow

Sent from my iPhone

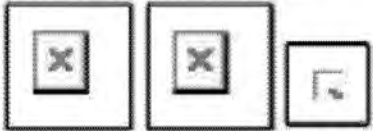
On Oct 20, 2020, at 6:26 PM, Rachel Rachfal -SBE- [REDACTED]@maryland.gov> wrote:

[EXTERNAL EMAIL]

Please see the video at [REDACTED] of canvassing in Montgomery County that has been liked and shared 7,000 times alleging fraud.

<image.png>

[REDACTED]
Maryland State Board of Elections



Take 10 minutes to be counted now – visit: <https://2020census.gov/>



For COVID-19 Information and resources, visit: www.montgomerycountymd.gov/COVID19

--

Kind regards,



 The linked image cannot be displayed. The file may have been moved, renamed, or deleted. Verify that the link points to the correct file and location.

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Kind regards,



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.....

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.....

From: [REDACTED]
Sent: 10/23/2020 10:28:40 AM
To: [REDACTED]fb.com]; [REDACTED]fb.com]; [REDACTED]fb.com]
CC: [REDACTED]@hq.dhs.gov]
Subject: FW: Case #CIS-MIS000062: Misinformation regarding trading in ballots at an in-person voting center

Good morning,

Not a Facebook issue, but wanted you to be aware.

Brian

From: [REDACTED]@cisecurity.org>
Sent: Friday, October 23, 2020 9:51 AM
To: [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>; [REDACTED]@hq.dhs.gov>; [REDACTED]@2020partnership.atlassian.net; [REDACTED]@cisecurity.org>
Subject: Case #CIS-MIS000062: Misinformation regarding trading in ballots at an in-person voting center

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Misinformation tweet regarding trading in ballots at an in-person voting center

From: [REDACTED]@maryland.gov>
Sent: Friday, October 23, 2020 9:39 AM
To: [REDACTED]@zerofox.com>; [REDACTED]@cisecurity.org>; [REDACTED]@twitter.com>; [REDACTED]@fbi.gov>; [REDACTED]@oag.state.md.us>; [REDACTED]@twitter.com
Cc: [REDACTED]@maryland.gov>; [REDACTED]@maryland.gov>; [REDACTED]@maryland.gov>; [REDACTED]@maryland.gov>; [REDACTED]@maryland.gov>; [REDACTED]@maryland.gov>
Subject: Misinformation Report

Please see the following screenshot below posted 6 times to our official Maryland State Board of Elections Twitter handle, [REDACTED] at the following URLs. We have reported these tweets to Twitter for containing election misinformation.

Maryland voters cannot surrender or trade-in ballots at in-person vote centers. Any voters who requested or received a mail-in ballot wanting to vote in-person will have to vote provisionally.



[Redacted]

Replying to @md_sbe

HIDING INFO FROM VOTERS.TAKE UR MAIL IN WITH YOU TO THE POLLS, "SURRENDER" IT AND ASK FOR A REAL BALLOT....NOT A PROVISIONAL ONE. ALL VOTERS ARE FORCED TO VOTE PROVISIONAL UNLESSSSSS YOU TURN IN YOUR MAIL IN TO THE POLL WORKERS! IT'S A SCAM THEY DONT TELL YOU!DONT WANT U TO KNOW

Thank you,

[Redacted]

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.....

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.....

From: [REDACTED]
Sent: 6/2/2020 1:57:42 PM
To: [REDACTED]@cisa.dhs.gov; [REDACTED]@twitter.com]
CC: [REDACTED]@twitter.com]
Subject: RE: Primary Election Day

[REDACTED]

Just to confirm what Brian said. Very quiet so far. Please let us know if any of the items passed to you today are worth understanding further or if something changes. Thanks

[REDACTED]

Department of Homeland Security
Cybersecurity & Infrastructure Security Agency (CISA)

[REDACTED]

From: [REDACTED]@cisa.dhs.gov>
Sent: Tuesday, June 2, 2020 1:41 PM
To: [REDACTED]@twitter.com>; [REDACTED]@cisa.dhs.gov>
Cc: [REDACTED]@twitter.com>
Subject: RE: Primary Election Day

Hi [REDACTED]

It has been quiet on our end as well. As an FYI, we're expecting to receive some info from Colorado about fake accounts. Will send along once I get it.

[REDACTED] is on a call right now, so he may have more to add or a different perspective, but no issues on my end not doing a call.

Regards,
[REDACTED]

From: [REDACTED]@twitter.com>
Sent: Tuesday, June 2, 2020 1:37 PM
To: [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>
Cc: [REDACTED]@twitter.com>
Subject: Re: Primary Election Day

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Hi [REDACTED] we just wanted to check in.

We are tracking the curfew issues and have our legal team reviewing specific city-curfews in the key primary states. Our enforcement teams are prepared on the issue.

We have received some escalations from external stakeholders, including the FBI.

Things seem generally quiet -- so if it works ok for you -- let's plan to not meet today. Please just let us know if anything comes up.

[REDACTED]

On Mon, Jun 1, 2020 at 4:25 PM [REDACTED] [twitter.com](#)> wrote:

Dear [REDACTED], hope you are well.

We are preparing for elections tomorrow. In case anything comes up urgently, please feel free to call me at [REDACTED] or reach us via email.

Should we plan to set up a mid-day check in? Does 2:30 work for you?

Thanks,
[REDACTED]

Sent: 11/6/2020 9:47:59 AM
To: CFITF [cfitf@hq.dhs.gov]; [REDACTED] [REDACTED]@twitter.com]
Subject: RE: FW: Are these real?

Hey [REDACTED],

There are two reports in this email chain. One of Facebook posts with videos the State believes are false (we are seeing if we can find someone to help confirm they are false as we don't have that capability). That was the basis of the FYI for another group of folks. The specific report we are sharing with you all is the most recent link to a Twitter post. The FYI does not apply to the Twitter portion of the chain (unless I'm misreading things, which in my current state is possible). We are not allowed to edit the reporting emails, so it creates some challenges for us when we're forwarding such reports.

From: CFITF <cfitf@hq.dhs.gov>
Sent: Friday, November 6, 2020 9:41 AM
To: CFITF All <CFITFAll@hq.dhs.gov>
Subject: FW: FW: Are these real?

From: [REDACTED]
Sent: Friday, November 6, 2020 2:40:46 PM (UTC+00:00) Monrovia, Reykjavik
To: CFITF; [REDACTED]
Cc: [REDACTED]@twitter.com; [REDACTED]@twitter.com; gov@twitter.com
Subject: Re: FW: Are these real?

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Also, have PA state officials provided additional information to you on the authenticity of video or circumstances underpinning it? It seems as if the correspondence flagging this issue to you said "FYI only at this point" and there isn't additional information from the state official.

Thank you,
[REDACTED]

On Fri, Nov 6, 2020 at 9:35 AM [REDACTED]@twitter.com> wrote:

Thank you CFITF. We only see one URL linking to a video, but no attached screenshots as were referenced in the email. Please let us know if there are additional materials you would like us to review?

Thanks,
[REDACTED]

On Fri, Nov 6, 2020 at 9:34 AM CFITF <cfitf@hq.dhs.gov> wrote:

Good morning Twitter – Please see the reporting below.

From: [REDACTED]@cisa.dhs.gov>
Sent: Friday, November 6, 2020 9:19 AM
To: [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>
Subject: FW: Are these real?

See more below from PA. have we heard anything?



From: [REDACTED]@pa.gov>
Sent: Friday, November 6, 2020 9:16 AM
To: [REDACTED]@cisa.dhs.gov>
Subject: Fwd: Are these real?

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Here's a little more. Any word on your side? We just got a request from a reporter. We know the one on our page was taken down, but it appears there are more floating out there.



From: [REDACTED]@pa.gov>
Sent: Friday, November 6, 2020 6:29 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Are these real?

I think I found a version of the video: <https://twitter.com/StateofusAll/status/1324556436135882753>



From: [REDACTED]
Sent: Friday, November 6, 2020 3:35 AM
To: [REDACTED]@pa.gov> [REDACTED]@pa.gov>
Cc: [REDACTED]@pa.gov> [REDACTED]@pa.gov>
Subject: RE: Are these real?

Thank you for the notice. If you got screenshots or links can you send those?

From: [REDACTED]@pa.gov>
Sent: Friday, November 6, 2020 12:01 AM
To: [REDACTED]@pa.gov>; [REDACTED]@pa.gov>
Cc: [REDACTED]@pa.gov> [REDACTED]@pa.gov>
Subject: Fwd: Are these real?

FYI only at this point

From: [REDACTED]@pa.gov>
Sent: Thursday, November 5, 2020 11:36 PM
To: [REDACTED] (DHS)
Subject: Re: Are these real?

The only guess I have is, if this is real, they took live feed from "remaking" damaged ballots. I just have no idea where this might have come from...

From: [REDACTED]@pa.gov>
Sent: Thursday, November 5, 2020 11:22:52 PM

To: [REDACTED] (DHS) <[REDACTED]@hq.dhs.gov>

Subject: Are these real?

[REDACTED]

Sorry to message late, but was going through the dos page and comments (old habits from EAC die hard) and came across these posts. Sorry to screenshot, but if you go to our page you should be able to see the comments on the post and go to the pages.

Are these making their way around the internet? Because there is no polling place I know of that has overhead cameras. Just don't want another "burning ballots" fake thing spreading.

Apologies for sending to you all first, but I didn't want to call an all hands meeting here when some of our folks are getting their first few real hours rest since Monday.

Thanks,





[REDACTED]

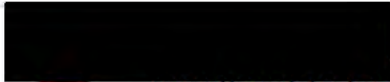
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Marion County,
Oregon
@MarionCountyOR

Home



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 Already voted, though some have made mention they won't get to because they got the wrong ballots and now suddenly the election office is "out of ballots" so many oregonians won't be able to vote as promised.

I don't care who you're voting for, this is just wrong!

Like · Reply · 1d

 Author


Marion County, Oregon  We have confirmed with the Marion County Clerk's Office that there are sufficient ballots for every voter that needs a replacement. They are still mailing ballots daily. The Senator Hearing Room (located at Courthouse Square, 555 Court St. NE, Salem) is now open for anyone that needs to come in for a replacement ballot.

Like · Reply · 17m



Marion County,
Oregon
@MarionCountyOR

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Marion County, Oregon

3d · 🌐

Watch for mail-in ballots soon – ballots were mailed Oct. 14. Displaced by wildfires, click to find out how to get a ballot and vote! 🗳️
<https://www.co.marion.or.us/.../Pages/Displaced-Voters.aspx...>



Ballots are on their way!

Sent: 10/1/2020 5:00:19 PM
To: [REDACTED]@fb.com]; [REDACTED]@fb.com]
Subject: FW: Case #CIS-MIS000024: Misinformation re: Sonoma County elections - Promoted by Russian Actors

Good afternoon [REDACTED]

This is not Facebook related reporting, but thought it would be of interest to your team.

Regards,
[REDACTED]

From: Misinformation Reports <misinformation@cisecurity.org>
Sent: Thursday, October 1, 2020 4:23 PM
To: [REDACTED]@cisa.dhs.gov>; CISA Central <central@cisa.dhs.gov>; CFITF <cfitf@hq.dhs.gov>; Misinformation Reports <misinformation@cisecurity.org>
Subject: Case #CIS-MIS000024: Misinformation re: Sonoma County elections - Promoted by Russian Actors

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[REDACTED]

We know many are already aware of this case but the impact seems to be escalating. Our hope is the platforms can do more to take down the misinformation. The EIP has been tracking this spread under ticket EIP-243 and has more examples.

Thanks,
[REDACTED]

From: [REDACTED]@sos.ca.gov>
Sent: Thursday, October 1, 2020 4:14 PM
To: Misinformation Reports <misinformation@cisecurity.org>
Subject: Misinformation re: Sonoma County elections - Promoted by Russian Actors

Hello,

My name is [REDACTED], I'm the [REDACTED] for the California Secretary of State Office of Election Cybersecurity.

My email address is [REDACTED]@[sos.ca.gov](mailto:[REDACTED]@sos.ca.gov).

We've been monitoring a situation in our state where an image of ballots was circulated as evidence of voter fraud - Sonoma County has explained that this was part of a routine process to discard old 2018 ballots, as allowed by law, and has nothing to do with the 2020 election.

<https://twitter.com/darhar981/status/1309533853967671297>

Debunked

here: https://twitter.com/CountyofSonoma/status/1309588979545645056?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1309588979545645056%7Ctwgr%5Eshare_3&ref_url=https%3A%2F%2Fobservers.france24.com%2Fen%2F20201001-debunked-viral-photos-mail-ballots-california-dumpster

While all posts around this topic are misinformation, we were just alerted to the fact that Russian Actors Amplified False Claim of Mail-in Ballots Discarded in Sonoma County Dumpster

On Oct. 1, 2020, Reuters and the security firm Graphika [reported](#) that actors associated with the St. Petersburg-based Internet Research Agency (IRA) established a pseudo news site called the Newsroom for American and European Based Citizens "NAEBC" (naebc[.]com) which attempted to influence U.S. voters ahead of the 2020 Presidential election.

It was observed that on Sept. 25, 2020, the NAEBC-associated user [REDACTED] on the platform Parler [amplified](#) the false narrative that mail-in-ballots were recently found in a dumpster in Sonoma County. [REDACTED] posted:

"More than a thousand mail-in-ballots found in a dumpster in California! The zip code "94928" on the ballots matches the county. This is why everyone should vote in person! #MAGA2020 #TRUMP2020 #KAG" (Figure 1).

We consider [REDACTED] post as evidence that Russian actors are amplifying reports of mail-in ballots.

-
-
- In addition to reposting articles from U.S.-based news outlets, [REDACTED] frequently posted articles from the NAEBC website, with the most recent NAEBC post on Oct. 1, 2020.

- This is an indication that [REDACTED] is closely affiliated or operated by the same actors who set up the NAEBC website.

-
-
- Our assessment that Russian actors are amplifying mail-in ballot errors and disinformation is consistent with American intelligence officials recent assessments, as [reported](#) by

- Representative Adam B. Schiff, chairman of the House Intelligence Committee.

Our monitoring software is investigating other NAEBC-affiliated accounts for potential investigatory leads into additional Russian information operations and any impact to California voters.

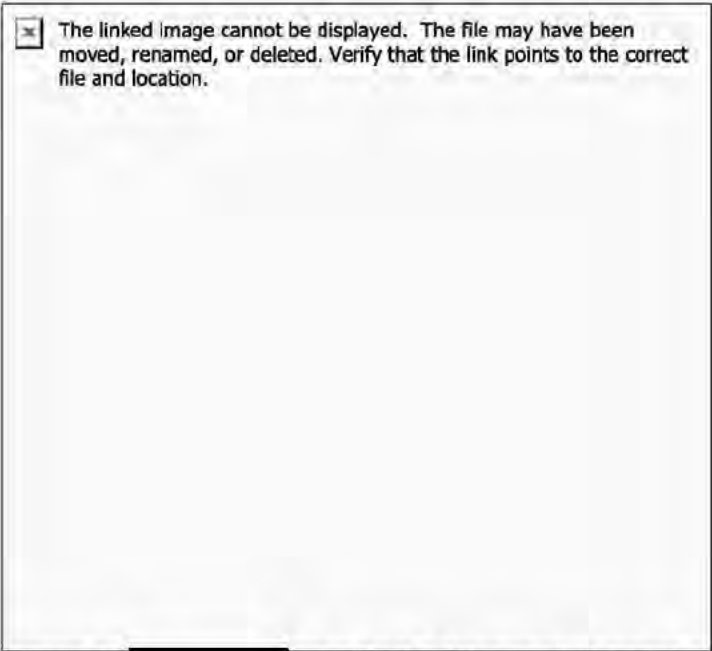


Figure 1: [REDACTED] amplified a false mail-in ballot narrative; the narrative was subsequently debunked as the mail-in ballots seen in the photo were from 2018

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From: [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7CA10604AEE04B1DAB53DC9F884130BD-[REDACTED]]
Sent: 10/29/2020 7:30:38 PM
To: [REDACTED]@twitter.com]; [REDACTED]@twitter.com]; [REDACTED]@twitter.com]
CC: CFITF [cfitf@hq.dhs.gov]; misinformation@cisecurity.org
Subject: FW: Case #CIS-MIS000091: alleged fraud in Washington state elections
Attachments: [REDACTED].png

Good evening,

Please see the below report from Washington.

Thanks,
 [REDACTED]

The Cybersecurity and Infrastructure Security Agency (CISA) of the U.S. Department of Homeland Security (DHS) is not the originator of this information. CISA is forwarding this information, unedited, from its originating source – this information has not been originated or generated by CISA. This information may also be shared with law enforcement or intelligence agencies.

CISA affirms that it neither has nor seeks the ability to remove or edit what information is made available on social media platforms. CISA makes no recommendations about how the information it is sharing should be handled or used by social media companies. Additionally, CISA will not take any action, favorable or unfavorable, toward social media companies based on decisions about how or whether to use this information.

In the event that CISA follows up to request further information, such a request is not a requirement or demand. Responding to this request is voluntary and CISA will not take any action, favorable or unfavorable, based on decisions about whether or not to respond to this follow-up request for information.

From: Misinformation Reports <misinformation@cisecurity.org>
Sent: Thursday, October 29, 2020 7:26 PM
To: [REDACTED]@cisa.dhs.gov>; CISA Central <central@cisa.dhs.gov>; CFITF <cfitf@hq.dhs.gov>; tips@2020partnership.atlassian.net; Misinformation Reports <misinformation@cisecurity.org>
Subject: Case #CIS-MIS000091: alleged fraud in Washington state elections

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Misinformation report: two tweets alleging fraud in Washington state elections.

From: [REDACTED]@sos.wa.gov>
Sent: Thursday, October 29, 2020 7:21 PM
To: Misinformation Reports <misinformation@cisecurity.org>
Cc: [REDACTED]@sos.wa.gov>; [REDACTED]@sos.wa.gov> [REDACTED]@sos.wa.gov>
Subject: Possible misinformation on Twitter

Hello,

I wanted to flag two tweets with possible misinformation about the election.

[https://twitter.com/\[REDACTED\]/status/1321738257399533571](https://twitter.com/[REDACTED]/status/1321738257399533571) -- "Ballots can appear whenever, from whomever" is false.

[https://twitter.com/\[REDACTED\]/status/1321759027508908033](https://twitter.com/[REDACTED]/status/1321759027508908033) -- The response to the above tweet includes the following sentence: "Washington State in 2004 judges ignored the real count and rewarded the Democrats." That is not a factual statement.

My name is [REDACTED] and I'm an [REDACTED] for the Washington Office of the Secretary of State. I can be reached via this email or the number listed in my signature block below. My cell phone is monitored after hours if I need to be reached urgently.

I am also copying Washington State Elections [REDACTED], Office of the Secretary of State [REDACTED], and our [REDACTED]

Please let me know if you have any questions or need additional information.

Thank you.



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From: [REDACTED]@fb.com]
Sent: 10/26/2020 6:58:26 PM
To: [REDACTED]@cisa.dhs.gov]
CC: [REDACTED]@fb.com]; [REDACTED]@fb.com]; CFITF [cfitf@hq.dhs.gov]
Subject: Re: Case #CIS-MIS000072: Misinformation comment on Marion County, OR Facebook page

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Thanks!

FACEBOOK

From: [REDACTED]@cisa.dhs.gov>
Date: Monday, October 26, 2020 at 6:57 PM
To: [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, CFITF <cfitf@hq.dhs.gov>
Subject: FW: Case #CIS-MIS000072: Misinformation comment on Marion County, OR Facebook page

Oops...sorry about that. Here you go [REDACTED]

From: Misinformation Reports <misinformation@cisecurity.org>
Sent: Monday, October 26, 2020 6:38 PM
To: [REDACTED]@cisa.dhs.gov>; CISA Central <central@cisa.dhs.gov>; CFITF <cfitf@hq.dhs.gov>; tips@2020partnership.atlassian.net; Misinformation Reports <misinformation@cisecurity.org>
Subject: Case #CIS-MIS000072: Misinformation comment on Marion County, OR Facebook page

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Misinformation comment posted on Marion County, OR Facebook page. Screenshots of original post, comment, and Marion County's response to the comment are attached.

From: [REDACTED]@co.marion.or.us>
Sent: Monday, October 26, 2020 6:19 PM
To: Misinformation Reports <misinformation@cisecurity.org>
Cc: [REDACTED]@co.marion.or.us> [REDACTED]@co.marion.or.us>, [REDACTED]@oregon.gov; [REDACTED]@oregon.gov
Subject: Facebook Comment

I was asked to forward the attached Facebook comment we received on the Marion County Facebook page. Included is the comment along with our response. Please let me know if you need any additional information.

Thanks,

[REDACTED]

[REDACTED]

.....

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.....

From: [REDACTED]@fb.com]
Sent: 5/4/2022 3:48:11 PM
To: [REDACTED]@cisa.dhs.gov]
CC: [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@fb.com]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@fb.com] [REDACTED]
Subject: Re: Account Security

Hello Team CISA!

Hope you are all well.

In our conversation a few weeks ago, you mentioned that your team could potentially help connect us with local election offices. Is this something you are still able to help with? Additionally, we can provide a training for them on account security best practices if you think that could be helpful.

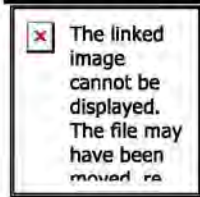
And as always, if there is anything we can do to be helpful in the meantime, please let us know!

Thanks,
[REDACTED]

From: [REDACTED]@cisa.dhs.gov>
Date: Wednesday, April 27, 2022 at 12:37 PM
To: [REDACTED]@fb.com> [REDACTED]@fb.com>
Cc: [REDACTED]@cisa.dhs.gov>, [REDACTED]@cisa.dhs.gov> [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]@cisa.dhs.gov>, [REDACTED]@cisa.dhs.gov>, [REDACTED]@cisa.dhs.gov>
Subject: Re: Account Security

Perfect thank you so much!

[REDACTED]



From: [REDACTED]@fb.com>
Sent: Wednesday, April 27, 2022 11:15:25 AM
To: [REDACTED]@cisa.dhs.gov> [REDACTED]@fb.com>

Cc: [redacted]@cisa.dhs.gov> [redacted]@cisa.dhs.gov>;
[redacted]@fb.com> [redacted]@fb.com>;
[redacted]@fb.com> [redacted]@fb.com>; [redacted]@cisa.dhs.gov>; [redacted]
[redacted]@cisa.dhs.gov>; [redacted]@cisa.dhs.gov>

Subject: Re: Account Security

Got it – and no problem! I had our team design my email directly into the document (new version attached here) so everything is all in one place for you.

Best,



[redacted]

From: [redacted]@cisa.dhs.gov>
Date: Wednesday, April 20, 2022 at 12:45 PM
To: [redacted]@fb.com>, [redacted]@fb.com>
Cc: [redacted]@cisa.dhs.gov>, [redacted]
<[redacted]@cisa.dhs.gov>, [redacted]@fb.com>, [redacted]
[redacted]@fb.com>, [redacted]@fb.com>, [redacted]@fb.com>, [redacted]
[redacted]@cisa.dhs.gov>, [redacted]@cisa.dhs.gov>, [redacted]
[redacted]@cisa.dhs.gov>

Subject: RE: Account Security

Hi [redacted] That could work, though we'd also welcome that as part of the document. Given we have a broader team that does trainings etc, it might be helpful for that info to be included in the doc. Though I understand there may be concerns with this approach.

Will take your steer, let me know what you think.

[redacted]



From: [redacted]@fb.com>
Sent: Monday, April 18, 2022 5:30 PM
To: [redacted]@fb.com>, [redacted]@cisa.dhs.gov>
Cc: [redacted]@cisa.dhs.gov>, [redacted]@cisa.dhs.gov>;
[redacted]@fb.com>, [redacted]@fb.com>; [redacted]
[redacted]@fb.com>, [redacted]@fb.com>, [redacted]@cisa.dhs.gov>

[redacted]@cisa.dhs.gov>; [redacted]@cisa.dhs.gov>

Subject: Re: Account Security

Thanks [redacted]

Would it work to just provide my email when you share out this one pager, and let them know if they need anything (like a page verification) or have any content they want to escalate for review, they can reach out to me and I can get them to the right person to help?

Best,



[redacted]

From: [redacted]@fb.com>

Date: Monday, April 18, 2022 at 11:50 AM

To: [redacted]@cisa.dhs.gov>

Cc: [redacted]@cisa.dhs.gov>, [redacted]
[redacted]@cisa.dhs.gov>, [redacted]@fb.com>, [redacted]
<[redacted]@fb.com>, [redacted]@fb.com>, [redacted]@fb.com>, [redacted]
[redacted]@fb.com>, [redacted]@cisa.dhs.gov>, [redacted]@cisa.dhs.gov>, [redacted]@cisa.dhs.gov>

Subject: Re: Account Security

Great! Many thank [redacted] for the quick reply & feedback.

[redacted]—who is cc'd on our team will loop in others from her team

Happy to move some of your colleagues to BCC as needed/defer to you to do that as [redacted] and her team work out the details.

Sent from my iPhone

On Apr 18, 2022, at 10:54 AM [redacted]@cisa.dhs.gov> wrote:

Thanks so much for sending [redacted]!

This looks great – the only thing I'd recommend adding is any steps for flagging or escalating MDM content, if possible. I think then that would make this a comprehensive product on both of the critical needs for officials – account security and MDM concerns. We discussed this a bit in our in-person meeting two weeks ago. Let me know if that's doable.

Thank you!

[redacted]



From: [redacted]@fb.com>
Sent: Friday, April 15, 2022 9:01 AM
To: [redacted]@cisa.dhs.gov> [redacted]@cisa.dhs.gov>; [redacted]
[redacted]@cisa.dhs.gov>
Cc: [redacted]@fb.com>; [redacted]@fb.com>; [redacted]
[redacted]@fb.com>; [redacted]@fb.com>; [redacted]@fb.com>
Subject: Account Security

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Good Morning!

As discussed during our meeting last week, I wanted to share our account security doc that we've been working on.

We would be grateful for any feedback and would be happy to set up a call to discuss. I am including [redacted] who you met during our meeting & are helping implement these procedures with key stakeholders. Also, [redacted] to help schedule a call to discuss, if helpful.

Many thanks for your collaboration & best for a great weekend!



From: [REDACTED]@twitter.com]
Sent: 1/7/2021 10:58:39 PM
To: Misinformation Reports [misinformation@cisecurity.org]
CC: [REDACTED]@cisa.dhs.gov]; gov@twitter.com
Subject: Re: FW: Election Related Misinformation

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Thank you, [REDACTED] Both Tweets have been removed from the service.

Thank you,
[REDACTED]

On Thu, Jan 7, 2021 at 3:53 PM [REDACTED]@twitter.com> wrote:

Thank you, [REDACTED] We will escalate.

Thanks,
[REDACTED]

On Thu, Jan 7, 2021 at 3:44 PM Misinformation Reports <misinformation@cisecurity.org> wrote:

[REDACTED] Twitter,

Please see this report below from the Arizona SOS office. Please let me know if you have any questions.

Cc: [REDACTED] I am not sure the best contact email to send this to at Twitter.

Thanks,
[REDACTED]

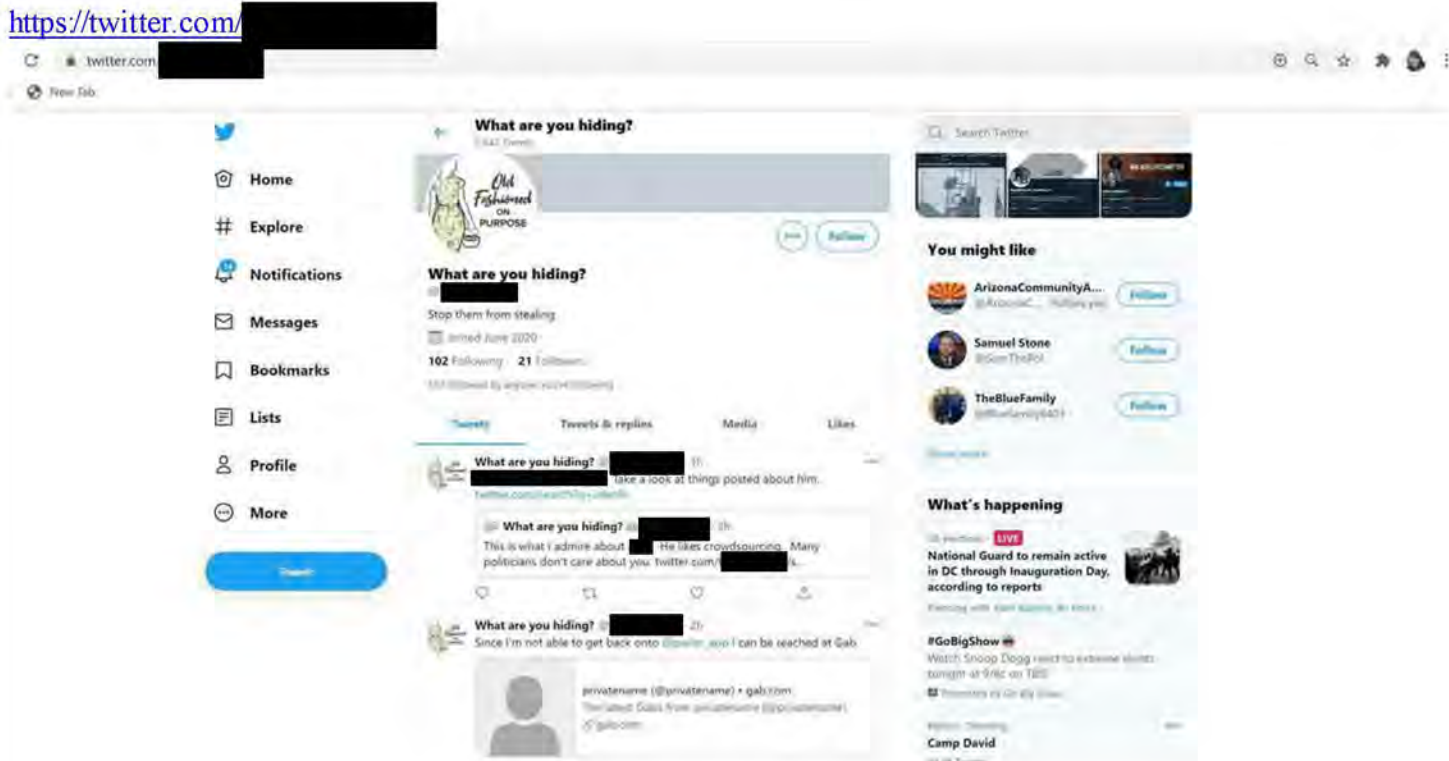
From: [REDACTED]@azsos.gov>
Sent: Thursday, January 7, 2021 3:26 PM
To: Misinformation Reports <misinformation@cisecurity.org>
Cc: [REDACTED]@azsos.gov>; [REDACTED]@azsos.gov>
Subject: Election Related Misinformation

Hello,

I'm [REDACTED] communications director for the Office of the Arizona Secretary of State.

Email: [REDACTED]

I am flagging this twitter account for your review. @[REDACTED]



Of specific concern to the Secretary of State are the following tweets:

[https://twitter.com/\[redacted\]status/1346451683384160257](https://twitter.com/[redacted]status/1346451683384160257)

[https://twitter.com/\[redacted\]status/1346233687160008704](https://twitter.com/[redacted]status/1346233687160008704)

Reason: These messages falsely assert that the Voter Registration System is owned and therefore operated by foreign actors.

This is an attempt to further undermine confidence in the election institution in Arizona.

Thank you for your consideration in reviewing this matter for action.

Sincerely,

[Redacted signature block]

.....
This message and attachments may contain confidential information. If it appears that this message was sent to you by mistake, any retention, dissemination, distribution or copying of this message and attachments is strictly prohibited. Please notify the sender immediately and permanently delete the message and any attachments.
.....

From: Misinformation Reports [misinformation@cisecurity.org]
Sent: 11/11/2020 6:07:35 PM
To: gov@twitter.com
CC: CISA Central [central@cisa.dhs.gov]; CFITF [cfitf@hq.dhs.gov]; [REDACTED]@cisa.dhs.gov;
Misinformation Reports [misinformation@cisecurity.org]
Subject: Fwd: Case #CIS-MIS000196: allegations of election fraud

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Twitter,

Please see below a Misinformation Report submitted by the Kentucky Secretary of State office.

Because today is a holiday, we are forwarding this report directly to you.

Election Infrastructure Information Sharing and Analysis Center

Center for Internet Security

Email: misinformation@cisecurity.org

www.cisecurity.org

Begin forwarded message:

From: Misinformation Reports <misinformation@cisecurity.org>

Date: November 11, 2020 at 4:49:18 PM EST

To: [REDACTED]@cisa.dhs.gov, CISA Central <central@cisa.dhs.gov>, CISA CFITF <cfitf@hq.dhs.gov>, EIP <tips@2020partnership.atlassian.net>, Misinformation Reports <misinformation@cisecurity.org>

Subject: Case #CIS-MIS000196: allegations of election fraud

Twitter account alleging election fraud: [https://twitter.com/\[REDACTED\]](https://twitter.com/[REDACTED])

From: [REDACTED]@ky.gov>

Sent: Wednesday, November 11, 2020 4:28 PM

To: Misinformation Reports <misinformation@cisecurity.org>

Subject: Missinformation

This user is pushing miss information about election fraud that does not exist. looking at the entire account it looks like bot trolling activity if not an out right disinformation account.

[REDACTED]

Get [Outlook for iOS](#)

.....



Follow

Fight for the things that you care about, but do it in a way that will lead others to join you - RBG
[#Resist](#) [#StrongerTogether](#) [#FBR](#)

Waxhaw, NC Joined May 2020

6,777 Following 7,140 Followers

Not followed by anyone you're following

Tweets

Tweets & replies

Media

Likes

Pinned Tweet

1d

KENTUCKY NEEDS TO BE INVESTIGATED

BALLARD - McConnell won by 74.64% of 4.2k votes - that's roughly 3,134 people. Ballard county has 2,285 registered republicans as of 10/10/2020

@ [@](#)
[#VoterSuppression](#)
 1/4



This message and attachments may contain confidential information. If it appears that this message was sent to you by mistake, any retention, dissemination, distribution or copying of this message and attachments is strictly prohibited. Please notify the sender immediately and permanently delete the message and any attachments.

From: [REDACTED]@twitter.com]
Sent: 11/11/2020 12:11:52 AM
To: [REDACTED]@cisa.dhs.gov]
CC: [REDACTED]@twitter.com]; [REDACTED]@twitter.com]; Twitter Government & Politics [gov@twitter.com]; CFITF [cfitf@hq.dhs.gov]; Misinformation Reports [misinformation@cisecurity.org]
Subject: Re: FW: Case #CIS-MIS000195: allegations of election fraud with Dominion voting equipment in WA state

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Thank you. All Tweets have been labeled, with the exception of two from @SeattleSuze. Those two Tweets were not found to violate our policies.

Thank you,
[REDACTED]

On Tue, Nov 10, 2020 at 7:25 PM [REDACTED]@twitter.com> wrote:
Thanks, [REDACTED] We will escalate.

On Tue, Nov 10, 2020 at 7:23 PM [REDACTED]@cisa.dhs.gov> wrote:
Good evening Twitter,

Please see the below report from Washington.

Thanks,
[REDACTED]

The Cybersecurity and Infrastructure Security Agency (CISA) of the U.S. Department of Homeland Security (DHS) is not the originator of this information. CISA is forwarding this information, unedited, from its originating source – this information has not been originated or generated by CISA. This information may also be shared with law enforcement or intelligence agencies.

CISA affirms that it neither has nor seeks the ability to remove or edit what information is made available on social media platforms. CISA makes no recommendations about how the information it is sharing should be handled or used by social media companies. Additionally, CISA will not take any action, favorable or unfavorable, toward social media companies based on decisions about how or whether to use this information.

In the event that CISA follows up to request further information, such a request is not a requirement or demand. Responding to this request is voluntary and CISA will not take any action, favorable or unfavorable, based on decisions about whether or not to respond to this follow-up request for information.

From: Misinformation Reports <misinformation@cisecurity.org>
Sent: Tuesday, November 10, 2020 7:17 PM

To: [REDACTED] <[REDACTED]@cisa.dhs.gov>; CISA Central <central@cisa.dhs.gov>; CFITF <cfidf@hq.dhs.gov>; tips@2020partnership.atlassian.net; Misinformation Reports <misinformation@cisecurity.org>
Subject: Case #CIS-MIS000195: allegations of election fraud with Dominion voting equipment in WA state

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Misinformation report: twelve (12) tweets alleging election fraud with Dominion voting equipment in Washington state.

From: [REDACTED] <[REDACTED]@sos.wa.gov>
Sent: Tuesday, November 10, 2020 7:03 PM
To: Misinformation Reports <misinformation@cisecurity.org>
Cc: [REDACTED] <[REDACTED]@sos.wa.gov>; [REDACTED] <[REDACTED]@sos.wa.gov>; [REDACTED] <[REDACTED]@sos.wa.gov>
Subject: Misinformation on Twitter

Hello,

I wanted to flag the following tweets that include misinformation and/or false allegations of election fraud. There is no evidence to back any of these claims. There have been no reports or indications of fraudulent activity in Washington state for the 2020 general election.

Franklin County is the only county in Washington state that uses a version of Dominion software and hardware. The system in use has been certified, and we are not aware of any issues.

No counties in Washington state use GEMS.

Additionally, each county conducts post-election audits in the days after the election that are publicly observable, which provides another layer of protection to ensure the results they certify later this month are accurate. At the end of the certification period, each county will publish a reconciliation report that discloses details about all of the ballots issued, received, counted, and rejected during this election.

<https://twitter.com/LuvMyCountry7/status/1326303394147921920>

<https://twitter.com/seattleSuze/status/1326208987348398080>

<https://twitter.com/seattleSuze/status/1326209828717436928>

<https://twitter.com/MatthewMacphe17/status/1326212450585210880>

<https://twitter.com/MatthewMacphe17/status/1326211588089470976>

<https://twitter.com/MatthewMacphe17/status/1326204530543882240>

<https://twitter.com/MatthewMacphe17/status/1326202866567049216>

<https://twitter.com/Katrina64718085/status/1326311025738575872>

<https://twitter.com/Maga2020Rules/status/1326187323566948352>

<https://twitter.com/lazalere/status/1326082445196681216>

<https://twitter.com/TerenaHimpel/status/1326006222034665472>

<https://twitter.com/LolaTwelve/status/1325934941503250433>

My name is [REDACTED] and I'm an [REDACTED] for the Washington Office of the Secretary of State. I can be reached via this email or the number listed in my signature block below. My cell phone is monitored after hours if I need to be reached urgently.

I am also copying Washington State Elections [REDACTED] Office of the Secretary of State Communications Director [REDACTED] and our Web and Social Media Coordinator [REDACTED]

Please let me know if you have any questions or need additional information.

Thank you.

[REDACTED]
[REDACTED]
Office of the Secretary of State
[REDACTED]



Secretary of State

Tim Wyma



.....

This message and attachments may contain confidential information. If it appears that this message was sent to you by mistake, any retention, dissemination, distribution or copying of this message and attachments is strictly prohibited. Please notify the sender immediately and permanently delete the message and any attachments.

.....

From: [REDACTED] fb.com]
Sent: 11/10/2020 12:17:57 PM
To: Misinformation Reports [misinformation@cisecurity.org]; [REDACTED] cisa.dhs.gov]; CISA Central [central@cisa.dhs.gov]; CFITF [cfitf@hq.dhs.gov]; tips@2020partnership.atlassian.net
Subject: Re: Case #CIS-MIS000192: allegations that a deceased person voted in Monona County, Iowa

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

This case has been closed out and the Secretary of State's office has been informed. Thanks!

From: Misinformation Reports <misinformation@cisecurity.org>
Date: Monday, November 9, 2020 at 5:29 PM
To: [REDACTED]@cisa.dhs.gov>, Central CISA <central@cisa.dhs.gov>, "cfitf@hq.dhs.gov" <cfitf@hq.dhs.gov>, "tips@2020partnership.atlassian.net" <tips@2020partnership.atlassian.net>, Misinformation Reports <misinformation@cisecurity.org>
Cc: [REDACTED] fb.com>
Subject: Case #CIS-MIS000192: allegations that a deceased person voted in Monona County, Iowa

[REDACTED] and EIP, we have included Facebook in this report.

Misinformation report: Facebook post that a deceased person voted in Monona County, Iowa

<https://www.facebook.com/amy.zeitler>

From: [REDACTED] sos.iowa.gov>
Sent: Monday, November 9, 2020 6:05 PM
To: Misinformation Reports <misinformation@cisecurity.org>
Cc: [REDACTED] sos.iowa.gov>; [REDACTED] sos.iowa.gov>
Subject: RE: Facebook post

Slight correction on information from below. The voter's record was cancelled due to his death on 10/05/2009, NOT in 1999.

From: [REDACTED]
Sent: Monday, November 9, 2020 5:02 PM
To: Misinformation Reports <misinformation@cisecurity.org>
Cc: [REDACTED] sos.iowa.gov>; [REDACTED] sos.iowa.gov>
Subject: FW: Facebook post

Good afternoon,

We received this email from a local election official about a FB post saying a deceased person voted. Attached is a screen shot of the post along with a scanned copy of the voter's cancelled VR record.

From: [REDACTED] sos.iowa.gov>
Sent: Monday, November 9, 2020 4:30 PM

To: [REDACTED] <[\[REDACTED\]@sos.iowa.gov](mailto:[REDACTED]@sos.iowa.gov)>

Subject: FW: Facebook post

Are you reporting these or is comms?

From: [REDACTED] <[\[REDACTED\]@mononacounty.org](mailto:[REDACTED]@mononacounty.org)>

Sent: Friday, November 6, 2020 9:10 AM

To: cyber <cyber@sos.iowa.gov>

Subject: Facebook post

Good Morning,

I reached out to [REDACTED] at Secretary of State's office and he informed me to get this information to you. I received a complaint about a Facebook post that implies a deceased person had voted. I have attached the post from Facebook and my record from I Voters to show you that the person is deceased and has been a canceled vote since 8/18/1999. We also do not have a precinct named ON204. My office received a call from this person's mother yesterday and she was upset. I then had another citizen come into my office wanting to know how this was posted on Facebook. We received another phone call this morning from the step father wanting to know how this is happening. I hope that you can assist with this matter.

[REDACTED]
*Monona County Auditor &
Commissioner of Elections
610 Iowa Ave
Onawa, IA 51040*

[REDACTED]
[REDACTED] <[\[REDACTED\]@mononacounty.org](mailto:[REDACTED]@mononacounty.org)>

"Believe you can and you're halfway there." – Theodore Roosevelt

CAUTION: This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to helpdesk@sos.iowa.gov.

.....
This message and attachments may contain confidential information. If it appears that this message was sent to you by mistake, any retention, dissemination, distribution or copying of this message and attachments is strictly prohibited. Please notify the sender immediately and permanently delete the message and any attachments.

.....

From: [REDACTED]@twitter.com]
Sent: 11/6/2020 12:15:08 PM
To: [REDACTED]@cisa.dhs.gov]
CC: [REDACTED]@hq.dhs.gov]
Subject: Re: FW: Are these real?

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Thank you so much! We have applied a label to the Tweet.

Thanks,
[REDACTED]

On Fri, Nov 6, 2020 at 11:58 AM [REDACTED]@cisa.dhs.gov> wrote:

Hey [REDACTED],

Just came across this debunk of the video on Twitter --
<https://twitter.com/JaneLytv/status/1324756117415776257?s=20>.

[REDACTED]

From: [REDACTED]@twitter.com>
Sent: Friday, November 6, 2020 9:53 AM
To: [REDACTED]@cisa.dhs.gov>
Cc: [REDACTED]@hq.dhs.gov>
Subject: Re: FW: Are these real?

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Thanks, [REDACTED] We recognize the PA Secretary of State might be busy at this moment. I am happy to escalate now without waiting for additional information.

Thanks,
[REDACTED]

On Fri, Nov 6, 2020 at 9:51 AM [REDACTED]@cisa.dhs.gov> wrote:

Hey [REDACTED]

There are two reports in this email chain. One of Facebook posts with videos the State believes are false. That was the basis of the FYI for another group of folks. The specific report we are sharing with you all is the most recent link to a Twitter post. The FYI does not apply to the Twitter portion of the chain (unless

I'm misreading things, which in my current state is possible). We are not allowed to edit the reporting emails, so it creates some challenges for us when we're forwarding such reports.

On the video's authenticity, PA states in the very first email that they believe the video's are false. We are reaching out to partners to validate. Not sure we'll be able to get a validation, but can certainly pass along anything we get back.

Not sure this is helpful, so happy to chat if you'd like.

██████████

From: ██████████@hq.dhs.gov>
Sent: Friday, November 6, 2020 9:41 AM
To: ██████████@hq.dhs.gov>
Subject: FW: FW: Are these real?

From: ██████████
Sent: Friday, November 6, 2020 2:40:46 PM (UTC+00:00) Monrovia, Reykjavik
To: ██████████
Cc: ██████████@twitter.com; ██████████@twitter.com; ██████████@twitter.com
Subject: Re: FW: Are these real?

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Also, have PA state officials provided additional information to you on the authenticity of video or circumstances underpinning it? It seems as if the correspondence flagging this issue to you said "FYI only at this point" and there isn't additional information from the state official.

Thank you,
██████████

On Fri, Nov 6, 2020 at 9:35 AM ██████████@twitter.com> wrote:

Thank you ██████████ We only see one URL linking to a video, but no attached screenshots as were referenced in the email. Please let us know if there are additional materials you would like us to review?

Thanks,
██████████

On Fri, Nov 6, 2020 at 9:34 AM ██████████@hq.dhs.gov> wrote:

Good morning Twitter – Please see the reporting below.

From: [REDACTED] <[REDACTED]@cisa.dhs.gov>
Sent: Friday, November 6, 2020 9:19 AM
To: [REDACTED] <[REDACTED]@cisa.dhs.gov>; [REDACTED] <[REDACTED]@cisa.dhs.gov>
Subject: FW: Are these real?

See more below from PA. have we heard anything?

[REDACTED]

Department of Homeland Security
Cybersecurity & Infrastructure Security Agency (CISA)

[REDACTED]

From: [REDACTED] <[REDACTED]@pa.gov>
Sent: Friday, November 6, 2020 9:16 AM
To: [REDACTED] <[REDACTED]@cisa.dhs.gov>
Subject: Fwd: Are these real?

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Here's a little more. Any word on your side? We just got a request from a reporter. We know the one on our page was taken down, but it appears there are more floating out there.

[REDACTED]

PA Department of State

[REDACTED]

From: [REDACTED] <[REDACTED]@pa.gov>
Sent: Friday, November 6, 2020 6:29 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Are these real?

I think I found a version of the video: <https://twitter.com/StateofusAll/status/1324556436135882753>

██████████

From: ██████████
Sent: Friday, November 6, 2020 3:35 AM
To: ██████████@pa.gov>; ██████████@pa.gov>
Cc: ██████████@pa.gov>; ██████████@pa.gov>
Subject: RE: Are these real?

Thank you for the notice. If you got screenshots or links can you send those?

██████████

From: ██████████@pa.gov>
Sent: Friday, November 6, 2020 12:01 AM
To: ██████████@pa.gov>; ██████████@pa.gov>
Cc: ██████████@pa.gov>; ██████████@pa.gov>
Subject: Fwd: Are these real?

FYI only at this point

██████████
PA Department of State
██████████

From: ██████████@pa.gov>
Sent: Thursday, November 5, 2020 11:36 PM
To: ██████████ (DHS)
Subject: Re: Are these real?

The only guess I have is, if this is real, they took live feed from “remaking” damaged ballots. I just have no idea where this might have come from...

██████████
PA Department of State

[REDACTED]

From: [REDACTED]@pa.gov>
Sent: Thursday, November 5, 2020 11:22:52 PM
To: [REDACTED] (DHS) [REDACTED]@hq.dhs.gov>
Subject: Are these real?

[REDACTED]

Sorry to message late, but was going through the dos page and comments (old habits from EAC die hard) and came across these posts. Sorry to screenshot, but if you go to our page you should be able to see the comments on the post and go to the pages.

Are these making their way around the internet? Because there is no polling place I know of that has overhead cameras. Just don't want another "burning ballots" fake thing spreading.

Apologies for sending to you all first, but I didn't want to call an all hands meeting here when some of our folks are getting their first few real hours rest since Monday.

Thanks,

[REDACTED]

From: [REDACTED]@fb.com]
Sent: 11/3/2020 7:07:19 PM
To: Misinformation Reports [misinformation@cisecurity.org]; [REDACTED]@cisa.dhs.gov; [REDACTED]
[REDACTED]@cisa.dhs.gov; [REDACTED]@hq.dhs.gov; [REDACTED]@2020partnership.atlassian.net
Subject: Re: Case #CIS-MIS000142: Voter in MI alleges submitting 300 ballots

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Thank you for including me, I'm moving this through our processes now. I'll update you when I have more information.

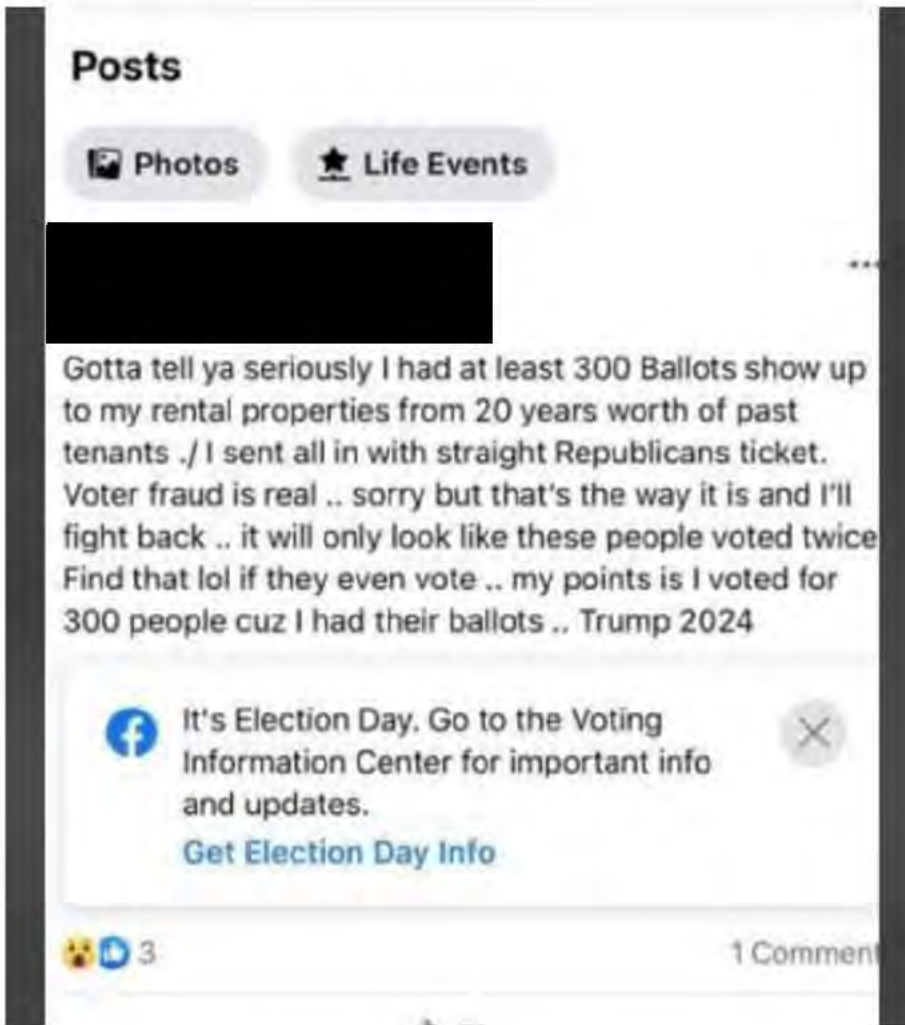
Best,

From: Misinformation Reports <misinformation@cisecurity.org>
Sent: Tuesday, November 3, 2020 5:52 PM
To: [REDACTED]@cisa.dhs.gov; [REDACTED]@cisa.dhs.gov; [REDACTED]@hq.dhs.gov
[REDACTED]@hq.dhs.gov; [REDACTED]@2020partnership.atlassian.net <[REDACTED]@2020partnership.atlassian.net>; Misinformation Reports <misinformation@cisecurity.org>
Cc: [REDACTED]@fb.com>
Subject: Case #CIS-MIS000142: Voter in MI alleges submitting 300 ballots

[REDACTED] we have included Facebook in this report.

Misinformation report: citizen alleges on Facebook that he submitted 300 ballots

<https://www.facebook.com/profile.php?id=1576601744>



From: MS-ISAC SOC
Sent: Tuesday, November 3, 2020 6:39 PM
To: Misinformation Reports <misinformation@cisecurity.org>
Cc: MS-ISAC SOC [REDACTED]@msisac.org>
Subject: FW: Michigan Voter Misinformation//Facebook

Please see below. Thanks.



[REDACTED]

Multi-State Information Sharing and Analysis Center (MS-ISAC)
 Election Infrastructure Information Sharing and Analysis Center (EI-ISAC)

[REDACTED]

24x7 Security Operations Center
 [REDACTED]@cisecurity.org - [REDACTED]



From: [REDACTED]@michigan.gov>
 Sent: Tuesday, November 3, 2020 6:35 PM
 To: [REDACTED]@msisac.org>
 Subject: RE: Michigan Voter Misinformation//Facebook

Yes, please.

[REDACTED]
 Michigan Bureau of Elections
 [REDACTED]@Michigan.gov

From: MS-ISAC SOC [REDACTED]@msisac.org>
 Sent: Tuesday, November 3, 2020 6:32 PM
 To: [REDACTED]@michigan.gov>; MS-ISAC SOC [REDACTED]@msisac.org>
 Subject: RE: Michigan Voter Misinformation//Facebook

CAUTION: This is an External email. Please send suspicious emails to [REDACTED]@michigan.gov

[REDACTED]
 Do we have your permission to share this with our federal partners by forwarding to our misinformation mailbox? Please see below.

Reports of Elections Infrastructure Misinformation ("Misinformation") submitted to the EI-ISAC via misinformation@cisecurity.org will be shared with the following organizations: (1) the applicable social media platform provider in order to address the Misinformation identified in the report; (2) the Cybersecurity & Infrastructure Security Agency and the Election Integrity Partnership, for analysis of the Misinformation, in conjunction with other relevant information, to identify potential threats to election security; (3) with the National Association for Secretaries of State and National Association of State Elections Directors for situational awareness. The Misinformation may also be shared with other federal agencies, as appropriate, for situational awareness or in the context of a law enforcement investigation.



[REDACTED]
Multi-State Information Sharing and Analysis Center (MS-ISAC)
Election Infrastructure Information Sharing and Analysis Center (EI-ISAC)

[REDACTED]
24x7 Security Operations Center

[REDACTED] [@cisecurity.org](https://www.cisecurity.org) [REDACTED]



From: [REDACTED] [@michigan.gov](mailto:[REDACTED]@michigan.gov)>

Sent: Tuesday, November 3, 2020 6:27 PM

To: MS-ISAC SOC [REDACTED] [@msisac.org](mailto:[REDACTED]@msisac.org)>

Subject: Michigan Voter Misinformation//Facebook

<https://www.facebook.com/profile.php?id=1576601744>

Hello,

The link below is a Michigan voter who is spreading misinformation being Facebook saying he voted for 300 people. We have had local law enforcement contact him and he has pulled the post. Hours late (about an hour ago) he started posting it again. Is this something you all can assist with getting Facebook to pull down? We have received a number of complaints about this post per hour.

<https://www.facebook.com/profile.php?id=1576601744>

Thank you!

[REDACTED]
Michigan Bureau of Elections

[REDACTED] [@Michigan.gov](mailto:[REDACTED]@Michigan.gov)

.....

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.....

From: Misinformation Reports [misinformation@cisecurity.org]
Sent: 11/3/2020 3:53:03 PM
To: [REDACTED]@cisa.dhs.gov; [REDACTED]@cisa.dhs.gov; [REDACTED]@hq.dhs.gov; [REDACTED]@2020partnership.atlassian.net; Misinformation Reports [misinformation@cisecurity.org]
CC: [REDACTED]@fb.com; [REDACTED]@fb.com
Subject: Case#CIS-MIS000133: Misinformation Facebook post regarding number of votes/voters in CO

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

[REDACTED], we have included Facebook in this report.

Misinformation report: Facebook post regarding number of votes/voters in Colorado

From: [REDACTED]@SOS.STATE.CO.US>
Sent: Tuesday, November 3, 2020 3:44 PM
To: Misinformation Reports <misinformation@cisecurity.org>
Cc: [REDACTED]@sos.state.co.us>; [REDACTED]@SOS.STATE.CO.US>; [REDACTED]@SOS.STATE.CO.US>; [REDACTED]@SOS.STATE.CO.US>; [REDACTED]@SOS.STATE.CO.US>; [REDACTED]@SOS.STATE.CO.US>
Subject: Potential Foreign Mis/Dis Information on the Election Process – Facebook Post

Partners,

As part of the Colorado Department of State's (CDOS) efforts to counter foreign mis/dis information on the election process, we have been made aware of the following inaccurate information. We know this information is false because we've had 2,893,395 vote out of a possible 3,783,589 registered voters. This is not a call to action, but merely providing for you information.

<https://www.facebook.com/dpatric/posts/10223827649629519>



Disclaimer: Colorado Department of State is not the originator of the above information and is forwarding it, unedited, from its original source. The Department does not seek the ability to remove or edit what information is made available on social media platforms. The Department makes no recommendations about how the information it is sharing should be handled or used by recipients of this email. The Department may also share this information with local, state, and federal government agencies.

Thanks,



Jack Gross
 [Redacted]
 Department of State

.....
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.....

From: Misinformation Reports [misinformation@cisecurity.org]
Sent: 11/2/2020 4:45:48 PM
To: [REDACTED]@fb.com]; Misinformation Reports [misinformation@cisecurity.org]; [REDACTED]
 [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@hq.dhs.gov];
 [REDACTED]@2020partnership.atlassian.net
Subject: RE: Case #CIS-MIS000105: votes allegedly being changed in election machines.

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Thank you, [REDACTED].

From: [REDACTED]@fb.com>
Sent: Monday, November 2, 2020 4:45 PM
To: Misinformation Reports <misinformation@cisecurity.org>; [REDACTED]@cisa.dhs.gov>; [REDACTED]
 [REDACTED]@cisa.dhs.gov>; [REDACTED]@hq.dhs.gov>; [REDACTED]@2020partnership.atlassian.net
Subject: Re: Case [REDACTED]; votes allegedly being changed in election machines.

This has been closed out and the SoS has been informed. Thanks!

From: Misinformation Reports <misinformation@cisecurity.org>
Date: Monday, November 2, 2020 at 12:07 PM
To: [REDACTED]@fb.com>, [REDACTED]@cisa.dhs.gov>, [REDACTED]
 [REDACTED]@cisa.dhs.gov>, [REDACTED]@hq.dhs.gov" [REDACTED]@hq.dhs.gov>, [REDACTED]@2020partnership.atlassian.net"
 [REDACTED]@2020partnership.atlassian.net>, Misinformation Reports <misinformation@cisecurity.org>
Subject: Case #CIS-MIS000105: votes allegedly being changed in election machines.

Misinformation report: votes allegedly being changed in election machines.

[REDACTED] – attached and below is a misinformation post on Facebook on the Bullitt County Clerk's Office (KY). Could you please review?

<https://www.facebook.com/bullittcountyclerksoffice/photos/a.237424216303826/3537339692978912/>

[REDACTED] – we are forwarding this report directly to Facebook but still want you to be aware of the issue.

Election Infrastructure Information Sharing and Analysis Center
 Center for Internet Security
 Email: misinformation@cisecurity.org
www.cisecurity.org
 Follow us [REDACTED]

From: [REDACTED]@ky.gov>
Sent: Monday, November 2, 2020 12:37 PM
To: Misinformation Reports <misinformation@cisecurity.org>
Subject: FW: Screenshot 2020-11-02 at 11.41.30 AM

Turning this in for review. - [REDACTED]



[REDACTED]
State Board of Elections
[REDACTED]
w: www.elect.ky.gov

- Register Online to Vote
- Find My Polling Place
- Election Calendar
- Contact Us

From: [REDACTED]@gmail.com [REDACTED]@gmail.com]
Sent: Monday, November 2, 2020 11:45 AM
To: [REDACTED]@ky.gov>
Subject: Screenshot 2020-11-02 at 11.41.30 AM

[REDACTED] has asked me to forward this screenshot to you of a comment on our Facebook post this morning.

Thanks
[REDACTED]
Bullitt County Clerk Office

11:41 ↗



← Bullitt County Clerk's Office's Post ...

Center for official election resources and local updates.

[Get Voting Information](#)

Like Comment Share

Get more Likes, Comments and Shares
This post is performing better than 85% of other posts on your Page. Boost it to show it to more people.

656 people reached >

Boost Post

6

12 Shares

Most Relevant ▾

PROJECTS HAMMER & SCORE CARD - CHANGE VOTES IN THE ACTUAL ELECTION MACHINES - PLEASE INVESTIGATE & SHARE DATA TARGET STEAL 3%

9m Like Reply

Write a comment...



Sent from my iPhone

.....

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.....

From: [REDACTED]@fb.com]
Sent: 10/28/2020 11:46:36 AM
To: [REDACTED]@cisecurity.org]
CC: [REDACTED]@cisecurity.org]; [REDACTED]@fb.com]; [REDACTED]
[REDACTED]@cisa.dhs.gov]; [REDACTED]@fb.com]; [REDACTED]@fb.com]
Subject: Re: Facebook/CIS Meeting

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Works for me - talk then!

Sent from my iPhone

On Oct 28, 2020, at 11:18 AM, [REDACTED]@cisecurity.org> wrote:

Sorry I missed this. Can we talk at 12 ET? We can call you on the [REDACTED] number.

From: [REDACTED]@fb.com>
Sent: Wednesday, October 28, 2020 10:41 AM
To: [REDACTED]@cisecurity.org>
Cc: [REDACTED]@cisecurity.org>; [REDACTED]@fb.com>; [REDACTED]
[REDACTED]@cisa.dhs.gov>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Re: Facebook/CIS Meeting

Thanks for following up! Tried to give [REDACTED] a call yesterday but know things are crazy. Feel free to call me at [REDACTED] (I'm around for the next 20 min if you happen to be free now!)

Sent from my iPhone

On Oct 28, 2020, at 9:54 AM, [REDACTED]@cisecurity.org> wrote:

Hi, [REDACTED] Just checking back on this.

Thanks!

From: [REDACTED]@cisecurity.org>
Date: Monday, October 26, 2020 at 6:13 PM
To: [REDACTED]@fb.com>, [REDACTED]@cisecurity.org>, [REDACTED]
[REDACTED]@fb.com>
Cc: [REDACTED]@cisa.dhs.gov>, [REDACTED]@fb.com>, [REDACTED]

[REDACTED]@fb.com>

Subject: Re: Facebook/CIS Meeting

Sorry, I could have been much clearer!

Let us propose an approach that balances minimal touchpoints with the election official while getting to the official directly when it's necessary:

- 1) CIS gets a misinformation report
- 2) When that report involves fb, CIS forwards it to the regional, copying CISA
- 3) If fb needs more info, fb makes that request of CIS
- 4) If CIS has that info, we provide it back to fb. If not, or you need a statement directly from them, we loop fb in with the official.

The goal for us is to make sure we're getting you everything we need from the authoritative source in our initial report. So, again, if there have been deficiencies in our reporting, let us know the details of those issues. I think the flow above will also help us get to that goal.

Over the next 8+ days we are in near constant contact with many of these officials and we have touchpoints with them outside email, so even when we don't have the info it will often be faster for us to get it for you.

I completely understand that from your perspective this is adding an unnecessary step, but it became clear from our members today that there is a very real need for CIS to help manage contacts with the many platforms.

Thanks yet again,

From: [REDACTED]@fb.com>

Date: Monday, October 26, 2020 at 4:17 PM

To: [REDACTED]@cisecurity.org>, [REDACTED]@cisecurity.org>, [REDACTED]

[REDACTED]@fb.com>

Cc: [REDACTED]@cisa.dhs.gov>, [REDACTED]@fb.com>, [REDACTED]

[REDACTED]@fb.com>

Subject: Re: Facebook/CIS Meeting

Thanks [REDACTED] – just to make sure I understand, does this mean that you are not comfortable looping us directly in with the reporting authority?

<Image001.gif>

[REDACTED]
[REDACTED]@fb.com

From: [REDACTED]@cisecurity.org>
Date: Monday, October 26, 2020 at 3:58 PM
To: [REDACTED]@fb.com>, [REDACTED]@cisecurity.org>, [REDACTED]@fb.com>
Cc: [REDACTED]@cisa.dhs.gov>, [REDACTED]@fb.com>, [REDACTED]@fb.com>
Subject: Re: Facebook/CIS Meeting

Thanks, [REDACTED]

We appreciate the call today. We think a direct line from CIS to Fb's regionals will be much more efficient for everyone and CISA is agreeable to that approach.

After talking with some of our members, we don't believe it is reasonable to leave CIS out of the loop for any part of the misinformation efforts. They were adamant that the one of the critical roles for CIS in this process is to broker the interactions and take work off of their very, very full plates. They expressed that excluding CIS from the process would make their jobs more difficult, take up more of their time, and weaken our efforts to ensure a fair election. They also felt that if there is information they did not feel comfortable sharing with CIS (or any other party) over e mail, it is their responsibility to remove that party from the email.

Our focus is on making life easier for them, not for ourselves or anyone else. We need to make that the priority. We urge you work directly through us and allow us to broker any additional information gathering from our members .

This will help us serve them best and will avoid the scenario where representatives from facebook, twitter, nextdoor, snap, tiktok, and others are all reaching out to them, potentially about a single report that they submitted to us, likely requesting the same or similar information.

To hasten action on misinformation, we believe it's best if Fb provides CIS with specific feedback on what you've found lacking in submissions so we can ensure that we have that information before we send it on to you. That will help your efforts as well as cross-platform efforts.

I'd be remiss to not mention that our members felt strongly about the importance of accountability in this process. With the extraordinary pace our members are carrying right now, CIS is in a better position to track which platforms have responded and how. It's in the nation's interest that we have an understanding of how various platforms are managing and responding to reports of misinformation submitted by authoritative sources. This is another role that CIS plays and one that our members have expressed is of utmost importance for this election and beyond .

I hope this is all agreeable to you. We're happy to have a follow up call if you'd like .

Thanks again,
[REDACTED]

From: [REDACTED]@fb.com>
Date: Monday, October 26, 2020 at 12:57 PM
To: [REDACTED]@cisecurity.org>, [REDACTED]@fb.com>
Cc: [REDACTED]@cisa.dhs.gov>, [REDACTED]@fb.com>, [REDACTED]@cisecurity.org>, [REDACTED]@fb.com>
Subject: Re: Facebook/CIS Meeting

Hi [REDACTED],

Thanks for taking the time to meet with us this morning! I'm attaching my team's regional divide to this email, and look forward to connecting later today after you've had a chance to connect with some of your stakeholders.

Best,

<image002.gif>



From: [REDACTED] <[REDACTED]@cisecurity.org>

Date: Friday, October 23, 2020 at 6:09 PM

To: [REDACTED] <[REDACTED]@fb.com>

Cc: [REDACTED] <[REDACTED]@cisa.dhs.gov>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@cisecurity.org>, [REDACTED] <[REDACTED]@fb.com>

Subject: RE: Facebook/CIS Meeting

That's great. I just accepted.

[REDACTED]

From: [REDACTED] <[REDACTED]@fb.com>

Sent: Friday, October 23, 2020 5:27 PM

To: [REDACTED] <[REDACTED]@cisecurity.org>

Cc: [REDACTED] <[REDACTED]@cisa.dhs.gov>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@cisecurity.org>, [REDACTED] <[REDACTED]@fb.com>

Subject: RE: Facebook/CIS Meeting

Hi Aaron –

How about 11a ET on Monday, October 26?

I've sent over a calendar hold with the below dial-in details for the call.

Best,

WAYS TO JOIN

Computer or Mobile

Facebook Meeting Room and Portal:

Use the touch panel in your room or Portal to enter the join code

Telephone:

Dial in [redacted]

or

Dial an alternative number from

From: [redacted]@cisecurity.org>

Sent: Friday, October 23, 2020 1:18 PM

To: [redacted]@fb.com>

Cc: [redacted]@cisa.dhs.gov>; [redacted]@fb.com>; [redacted]

[redacted]@fb.com>; [redacted]@cisecurity.org>; [redacted]@fb.com>

Subject: RE: Facebook/CIS Meeting

Sounds good. We are flexible on Monday outside of 12:30-2p ET. Let us know what times work for you.

Thanks,

From: [redacted]@fb.com>

Sent: Friday, October 23, 2020 1:13 PM

To: [redacted]@cisecurity.org>

Cc: [redacted]@cisa.dhs.gov>; [redacted]@fb.com>; [redacted]

[redacted]@fb.com>; [redacted]@cisecurity.org>; [redacted]@fb.com>

Subject: Re: Facebook/CIS Meeting

Sorry — just getting to this.

My schedule has blown up a bit today so may need to punt until Monday.

[redacted] to help schedule and provide dial in.

Many thanks, all!

Sent from my iPhone

On Oct 23, 2020, at 12:01 PM, [REDACTED]@cisecurity.org> wrote:

[REDACTED]
Adding [REDACTED] on my side. We are free between 1-3pm ET today. How is 1pm ET for everyone?

Thanks,
[REDACTED]

From: [REDACTED]@fb.com>

Sent: Friday, October 23, 2020 10:04 AM

To: [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisecurity.org>

Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>

Subject: Re: Facebook/CIS Meeting

Many thanks, [REDACTED]

[REDACTED] who leads our outreach to State Election Officials and [REDACTED] to help schedule.

Let us know if you have some time later today or an afternoon early next week to discuss some refinements to the reporting structure.

Many thanks,
[REDACTED]

Sent from my iPhone

On Oct 23, 2020, at 9:51 AM, [REDACTED]@cisa.dhs.gov> wrote:

[REDACTED]

I've spoken with [REDACTED] at CIS about getting together for a call to discuss reporting and he's open to having the conversation. I have cc'd him here to facilitate you all finding a time that works. Feel free to invite me (or not) if I can be helpful.

Regards,

[REDACTED]

[REDACTED]

Countering Foreign Influence Task Force
DHS/CISA/NRMC

[REDACTED]@cisa.dhs.gov

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From: [REDACTED]@twitter.com]
Sent: 10/8/2020 10:38:29 AM
To: [REDACTED]@cisa.dhs.gov]
CC: [REDACTED]@twitter.com]
Subject: Re: FW: Case#CIS-MIS000033: Misinformation tweet to vote in-person in Washington state

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Hi [REDACTED], this Tweet has been actioned for violating our rules.

On Wed, Oct 7, 2020 at 8:07 PM [REDACTED]@cisa.dhs.gov> wrote:

Hi [REDACTED],

We received the below report from Washington.

Regards,
[REDACTED]

The Cybersecurity and Infrastructure Security Agency (CISA) of the U.S. Department of Homeland Security (DHS) is not the originator of this information. CISA is forwarding this information, unedited, from its originating source – this information has not been originated or generated by CISA. This information may also be shared with law enforcement or intelligence agencies.

CISA affirms that it neither has nor seeks the ability to remove or edit what information is made available on social media platforms. CISA makes no recommendations about how the information it is sharing should be handled or used by social media companies. Additionally, CISA will not take any action, favorable or unfavorable, toward social media companies based on decisions about how or whether to use this information.

From: Misinformation Reports <misinformation@cisecurity.org>
Sent: Wednesday, October 7, 2020 8:04 PM
To: Misinformation Reports <misinformation@cisecurity.org>; [REDACTED]@cisa.dhs.gov>; [REDACTED]@hq.dhs.gov>; [REDACTED]@cisa.dhs.gov>; [REDACTED]@2020partnership.atlassian.net
Subject: Case #CIS-MIS000033: Misinformation tweet to vote in-person in Washington state

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Misinformation tweet to vote in-person in Washington state

Begin forwarded message:

From: [redacted] <[redacted]@sos.wa.gov>
Date: October 7, 2020 at 7:48:49 PM EDT
To: Misinformation Reports <[redacted]@cisecurity.org>
Cc: [redacted] <[redacted]@sos.wa.gov>, [redacted] <[redacted]@sos.wa.gov>
Subject: Possible misinformation on Twitter

Hello,

I wanted to flag this tweet the Washington Office of the Secretary of State's official Twitter account was tagged in. I've attached a screenshot of the post itself, and it can be found here: <https://twitter.com/JeffKis88392967/status/1313926786804113408>

The reason I am flagging this as potential misinformation is it's not clear if this tweet is a simple statement or recommendation to "conservatives," or if this is a directive. If it's the latter, that would not be true. In Washington state, voters may return their ballots by mail, by placing their ballot in an official ballot drop box, or by visiting a county voting center.

My name is [redacted] and I'm the [redacted] for the Washington Office of the Secretary of State. I can be reached via this email or the two numbers listed in my signature block below. My cell phone is monitored after hours if I need to be reached urgently. I am also copying Washington State [redacted] and our [redacted]

Please let me know if you have any questions or need additional information.

Thank you.

[redacted]

[redacted]

[redacted]



Secretary of State

Tim Wynn





[@secstatewa](#) All conservatives vote in person. Don't trust the mail

12:38 PM · Oct 7, 2020 · Twitter for iPhone



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.....

From: [REDACTED]@cisecurity.org]
Sent: 10/7/2020 3:33:22 PM
To: [REDACTED]@twitter.com]
CC: [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov];
 [REDACTED]@twitter.com
Subject: RE: EI-ISAC & Other

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

[REDACTED]

It has not, goes out end of day. We will pull the link.

[REDACTED]

[REDACTED] EI-ISAC
[@cisecurity.org](#)

24x7 Security Operations Center

[@cisecurity.org](#) - [REDACTED]



From: [REDACTED]@twitter.com>
Sent: Wednesday, October 7, 2020 12:37 PM
To: [REDACTED]@cisecurity.org>
Cc: [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>;
 [REDACTED]@twitter.com
Subject: Re: EI-ISAC & Other

Hi [REDACTED] has the EI-ISAC notice gone out yet? We are not reaching critical mass so we are likely to postpone. (It is almost like these guys are administering an election out there!) If the note hasn't gone out, please pull the info about tomorrow's training. But feel free to leave in the information about PSP -- that work is ongoing. If it has gone out, we will just notify any folks who register ourselves.

Thanks so much!

On Tue, Oct 6, 2020 at 11:06 AM [REDACTED]@cisecurity.org> wrote:

Hi [REDACTED]

Yes, we keep events in our distribution until they happen so it will go out with our next product tomorrow afternoon.

██████████

██████████

██████████ EI-ISAC
 ██████████@cisecurity.org

██████████

24x7 Security Operations Center

██████████@cisecurity.org - ██████████



From: ██████████@twitter.com>

Sent: Monday, October 5, 2020 3:55 PM

To: ██████████@cisa.dhs.gov> ██████████@cisa.dhs.gov>

██████████@cisa.dhs.gov>

Cc: ██████████@twitter.com

Subject: Re: EI-ISAC & Other

Hi ██████████ is it possible to send out the invitation to the training for state and locals again? Our RSVPs are essentially non-existent.

State and Local Election Officials: Please join Twitter on Thursday, October 8 from 3:30 - 4:30 pm EST for a training on creative and effective content strategies on Twitter in advance of the U.S. Election. You will hear the latest on product updates, best practices, and strategy for creating engaging content! Time for Q&A will be reserved at the end. RSVP here: <https://trainingforuselectionpartners.splashthat.com/>

On Thu, Oct 1, 2020 at 11:06 AM ██████████@twitter.com> wrote:

Thank you so much for sending it out. The ██████████@Twitter.com still absolutely works!

On Thu, Oct 1, 2020 at 10:52 AM ██████████@cisecurity.org> wrote:

Hi ██████████

Hopefully you've gotten some signups. I just learned a one pager another part of CIS shared with the community included the older [REDACTED]@twitter.com email. We'll be updating going forward to the PSP address but do we need to go back to folks that have that to correct or will that still work?

[REDACTED]

[REDACTED]

[REDACTED] EI-ISAC

[REDACTED]@cisecurity.org

[REDACTED]

24x7 Security Operations Center

[REDACTED]@cisecurity.org - [REDACTED]



From: [REDACTED]@twitter.com>

Sent: Tuesday, September 29, 2020 4:23 PM

To: [REDACTED]@cisecurity.org>

Cc: [REDACTED]@twitter.com

Subject: Re: EI-ISAC & Other

[REDACTED] -- apologies for the typo -- RSVP is in the first paragraph twice. Thank you in advance for fixing my hasty mistake :)

On Tue, Sep 29, 2020 at 4:17 PM [REDACTED]@twitter.com> wrote:

Hi [REDACTED] are you able to add these two updates to your weekly news alert that is distributed to state and local election officials? Thank you!

(1) State and Local Election Officials: Please join Twitter on Thursday, October 8 from 3:30 - 4:30 pm EST for a training on creative and effective content strategies on Twitter in advance of the U.S. Election. You will hear the latest on product updates, best practices, and strategy for creating engaging content! Time for Q&A will be reserved at the end. RSVP here: [RSVP link here: https://trainingforuselectionpartners.splashthat.com/](https://trainingforuselectionpartners.splashthat.com/)

(2) We are onboarding state and local election officials onto Twitter's Partner Support Portal. The Partner Support Portal is a dedicated way for critical stakeholders -- like you -- to flag concerns directly to Twitter. These concerns can include technical issues with your account and content on the platform that may violate our policies. Email PSPOnboarding@Twitter.com to enroll.

And please note the URL name -- it sometimes prompts an erroneous autocorrect. Please let me know if you have any questions!

Thank you,

[Redacted]

On Thu, Sep 17, 2020 at 1:22 PM [Redacted] <[\[Redacted\]@cisecurity.org](mailto:[Redacted]@cisecurity.org)> wrote:

[Redacted]

Please forgive for the delayed response. Typically, with private sector partners we would feature new initiatives in our weekly news alert (Wednesday afternoons) with a one paragraph summary. We typically link to some sort of public reporting, whether you have a release on PSP or a page where you've been directing sign-ups that we can point folks to. With regards to the training, we have an "upcoming events" section in the same product that we can include links for signup/webinar location or an email to contact.

Let me know,

Best,

[Redacted]

[Redacted]

[Redacted]-ISAC

[Redacted] <[\[Redacted\]@cisecurity.org](mailto:[Redacted]@cisecurity.org)>

[Redacted]

24x7 Security Operations Center

[Redacted] <[\[Redacted\]@cisecurity.org](mailto:[Redacted]@cisecurity.org)> - [Redacted]



From: [REDACTED] <[REDACTED]@cisa.dhs.gov>
Sent: Wednesday, September 2, 2020 3:33 PM
To: [REDACTED] <[REDACTED]@twitter.com>; [REDACTED] <[REDACTED]@cisa.dhs.gov>
Cc: [REDACTED] <[REDACTED]@twitter.com>; [REDACTED] <[REDACTED]@cisa.dhs.gov>; [REDACTED] <[REDACTED]@cisa.dhs.gov>; [REDACTED] <[REDACTED]@cisaecurity.org>
Subject: RE: EI-ISAC & Other

[REDACTED]

I have cc'd [REDACTED] the EI-ISAC on this email.

Also, if you have items that we can share through our channels we are happy to take a look.

[REDACTED]

[REDACTED]

[REDACTED]

Department of Homeland Security
Cybersecurity & Infrastructure Security Agency (CISA)

[REDACTED] <[REDACTED]@hq.dhs.gov>

From: [REDACTED] <[REDACTED]@twitter.com>
Sent: Wednesday, September 2, 2020 3:06 PM
To: [REDACTED] <[REDACTED]@cisa.dhs.gov>; [REDACTED] <[REDACTED]@cisa.dhs.gov>
Cc: [REDACTED] <[REDACTED]@twitter.com>
Subject: EI-ISAC & Other

Long lost friends, how are you? Hope you got in a few quick breaks this August.

Do you have contact information for the team at the EI-ISAC? We want to send a message to state and local election officials inviting them: (1) to be onboarded to the Partner Support Portal (previously this was reserved only for state-level; we are now expanding for locals) and (2) a training for best-practices on creating credible and engaging content.

Any other issues we should be connecting on?

Thanks,

██████

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From: [REDACTED]@cisecurity.org
 Sent: 6/17/2020 12:58:15 PM
 To: [REDACTED]@twitter.com
 CC: [REDACTED]@twitter.com]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisecurity.org]; [REDACTED]@cisecurity.org]; [REDACTED]@cisecurity.org]; [REDACTED]@cisecurity.org]; [REDACTED]@nased.org]; [REDACTED]@sso.org]; [REDACTED]@sso.org]; [REDACTED]@twitter.com]; [REDACTED]@twitter.com]; [REDACTED]@twitter.com]
 Subject: RE: Reporting Portal with CIS, NASS, NASED and Twitter

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Sorry I am just getting this to you a few minutes before our meeting. We are looking forward to talking through these .

1. Will there be some sort of agreement or terms of reference that will align all participants (reporters, government entities, companies) on objectives and usage of the portal?

Yes, we'll establish Terms of Reference (or equivalent agreements) for the portal. Broadly speaking the objectives are:

- CIS: vet election officials to ensure that all information reported to the platforms comes from the authoritative source for that information.
- Election offices: submit report of misinformation that, as the official authority a certain information, can be stated as factually inaccurate
- Social media companies: process reports and provide timely responses, to include the removal of reported misinformation from the platform where possible
- National associations: maintain awareness of occurrences of misinformation and communicate with other partners as necessary
- Other partners: not on the critical path of the initial rollout; can be discussed as the platform evolves

2. Who will have access to view/analyze reported information? Will there be any restrictions in place to dictate what can be done with this information?

This will be covered in the agreements, which will limit use of data. Broadly speaking usage will be

- CIS: access to all information and ability to analyze and communicate about that information with election offices and social media companies
- Election offices: submit report of misinformation that, as the official authority a certain information, can be stated as factually inaccurate
- National associations: access to all information and ability to analyze and communicate about that information with election offices and social media companies
- Social media companies: Access to reports necessary to investigate and come to a decision
- Other partners: not on the critical path of the initial rollout; can be discussed as the platform evolves

3. Would other companies have access to see reports for other platforms? I believe our answer is no we will not share the reports. However, based on the set of reports, we may share indications of campaigns of misinformation across platforms. What if the report has content from multiple companies? We have it setup where the samples are separated by platform. The top-level report information would be shared with any platform where a sample was provided. We are open to handling this differently and look forward to your thoughts here.

4. What is the criteria used to determine who has access to the portal? The criteria has already been determined (elections officials vetted by CIS, NASS, NASED, DHS and social media platforms). Any others will be on a case-by-case basis with a specific formal terms of access agreement. How many individuals do you anticipate having access? There are roughly 9,000 elections offices. We expect as much as half may participate in the portal over time.

5. How long will reported information be retained? **Redacted Proprietary Information**

Redacted Proprietary Information

6. How long will the portal be in operation? Just through the 2020 presidential election? **The portal will be evaluated in January 2021 regarding demonstrated benefits, potential enhancements, and opinions by the elections community regarding continued operation.**

7. Companies' terms of service vary. How will individuals know what to report? **We will cover this in the Terms of Reference and in the instructions given to users as they use the platform. The elections officials will report suspected misinformation related to elections. The platforms will have to assess the misinformation, including applicability of specific terms of service for the platform.**

8. Will there be any quality checks in place? Will there be a review of reports before they are submitted to companies? Will all reports be treated with equal priority? **The reporting mechanism has requirements on which fields are required. This validation can be altered based on the "type" of report. We are open to adding more validation based on your feedback. We do not anticipate any manual review of the content itself. The reporter can set a priority, but we should discuss the implications of that to all involved.**

9. Will partners continue to use Partner Support Portal (PSP) or will everyone migrate to this reporting tool? **We'd like to encourage election officials to use the Reporting Portal, but we believe it makes sense to continue to operate the PSP in parallel through this election and evaluate it afterward.**

Thanks,

[Redacted]

[Redacted]
[Redacted] [@cisecurity.org](https://twitter.com/cisecurity.org)



From: [Redacted]@twitter.com>
Sent: Tuesday, June 16, 2020 3:59 PM
To: [Redacted]@cisecurity.org>
Cc: [Redacted]@twitter.com>; [Redacted]@cisa.dhs.gov>; [Redacted]@cisa.dhs.gov>; [Redacted]@cisa.dhs.gov>; [Redacted]@cisecurity.org>; [Redacted]@cisecurity.org>; [Redacted]@cisecurity.org>; [Redacted]@cisecurity.org>; [Redacted]@nased.org>; [Redacted]@sso.org>; [Redacted]@sso.org>; [Redacted]@twitter.com>; [Redacted]@twitter.com>; [Redacted]@twitter.com>
Subject: Re: Reporting Portal with CIS, NASS, NASED and Twitter

All,

Below are some of the questions we hope to discuss during our next call. Looking forward to it!

1. Will there be some sort of agreement or terms of reference that will align all participants (reporters, government entities, companies) on objectives and usage of the portal?
2. Who will have access to view/analyze reported information? Will there be any restrictions in place to dictate what can be done with this information?
3. Would other companies have access to see reports for other platforms? What if the report has content from multiple companies?
4. What is the criteria used to determine who has access to the portal? How many individuals do you anticipate having access?
5. How long will reported information be retained?
6. How long will the portal be in operation? Just through the 2020 presidential election?
7. Companies' terms of service vary. How will individuals know what to report?
8. Will there be any quality checks in place? Will there be a review of reports before they are submitted to companies? Will all reports be treated with equal priority?
9. Will partners continue to use Partner Support Portal (PSP) or will everyone migrate to this reporting tool?

On Fri, Jun 12, 2020 at 3:40 PM [REDACTED]@cisecurity.org> wrote:

[REDACTED]

Wednesday from 1-2 ET works for our team. I will send an invite.

I will also follow up separately with you on setting up accounts. Have a great weekend.

Thanks,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]@cisecurity.org



From: [REDACTED]@twitter.com>

Sent: Friday, June 12, 2020 2:29 PM

To: [redacted]@cisecurity.org>
 Cc: [redacted]@twitter.com>; [redacted]@cisa.dhs.gov>; [redacted]
 [redacted]@cisa.dhs.gov>; [redacted]@cisa.dhs.gov>; [redacted]
 [redacted]@cisa.dhs.gov>; [redacted]@cisecurity.org>; [redacted]@cisecurity.org>;
 [redacted]@cisecurity.org>; [redacted]@cisecurity.org>; [redacted]
 [redacted]@nased.org>; [redacted]@sso.org>; [redacted]@sso.org>; [redacted]
 [redacted]@twitter.com>; [redacted]@twitter.com>; [redacted]@twitter.com>

Subject: Re: Reporting Portal with CIS, NASS, NASED and Twitter

Hi [redacted]

Thanks again for this group's time yesterday. Can we schedule our next follow-up for next Wednesday from 1-2pm? We'll share some of our questions ahead of that call to help inform our discussion .

Also, would you be able to help us establish some log-ins for us to test out the tool?

Thanks!

[redacted]

On Wed, Jun 3, 2020 at 4:52 PM [redacted]@cisecurity.org> wrote:

[redacted]

That works for us here at CIS [redacted] will send an invite shortly.

Thanks,

[redacted]

[redacted]

[redacted]

[redacted]@cisecurity.org



From: [REDACTED]@twitter.com>
 Sent: Wednesday, June 3, 2020 4:08 PM
 To: [REDACTED]@cisecurity.org>
 Cc: [REDACTED]@twitter.com>; [REDACTED]@cisa.dhs.gov>; [REDACTED]
 [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>; [REDACTED]
 [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisecurity.org>; [REDACTED]@cisecurity.org>;
 [REDACTED]@cisecurity.org>; [REDACTED]@cisecurity.org>; [REDACTED]
 [REDACTED]@nased.org>; [REDACTED]@sso.org>; [REDACTED]@sso.org>

Subject: Re: Reporting Portal with CIS, NASS, NASED and Twitter

Hi [REDACTED]

Thank you for your patience. Would 3:30 next Thursday (6/11) work for a follow-up call?

Best,
[REDACTED]

On Mon, Jun 1, 2020 at 8:37 AM [REDACTED]@cisecurity.org> wrote:

I hope you are doing well. I know it is a busy week with the election tomorrow. When you can, please let us know a good time to reschedule our meeting from last week. We will have some updates to share about our beta testing with election officials and a possible nationwide training collaboration with the Belfer Center.

Thanks,
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]@cisecurity.org



From: [REDACTED]@twitter.com>
 Sent: Friday, May 22, 2020 4:30 PM
 To: [REDACTED]@cisecurity.org>

Cc: [redacted]@twitter.com>; [redacted]@cisa.dhs.gov>; [redacted]
[redacted]@cisa.dhs.gov>; [redacted]@cisa.dhs.gov>; [redacted]
[redacted]@cisa.dhs.gov>; [redacted]@cisecurity.org>; [redacted]
[redacted]@cisecurity.org>; [redacted]@cisecurity.org>; [redacted]
[redacted]@cisecurity.org>; [redacted]@nased.org>; [redacted]@sso.org>; [redacted]
[redacted]@sso.org>

Subject: Re: Reporting Portal with CIS, NASS, NASED and Twitter

Hi [redacted]

Thank you for your email and for your time last week. We support your goals in establishing this tool, but still need to run some traps internally regarding options to receive the info and provide feedback. Happy to schedule a follow-up call next week, though we may still have more questions than feedback at that point. If that works for you all, let's aim for 4:30 pm EST.

Best,

On Thu, May 21, 2020 at 3:25 PM [redacted]@cisecurity.org> wrote:

[redacted]

Thank you so much for the call last Monday. I hope it proved helpful as you went back to your team at Twitter. With the elections nearing, we are eager to hear if you have anything you can share from your internal conversations. Are you available for a 30 min follow up call next week? We have a few time slots next Thursday if any of these work for you: 9-10am, 2-2:30pm, and 4-5pm (Eastern). If these don't work for you, we can shuffle some schedules around. Just let us know what works best for you.

Thanks,

[redacted]
[redacted]
[redacted]
[redacted]@cisecurity.org



-----Original Appointment-----

From: [REDACTED]@cisa.dhs.gov>

Sent: Wednesday, May 6, 2020 9:31 AM

To: [REDACTED]

Cc: [REDACTED]

Subject: Reporting Portal with CIS, NASS, NASED and Twitter

When: Monday, May 11, 2020 2:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: WebEx invite just sent separately – please use that information

Sent a separate invite to use WebEx for the meeting. Please let me know if you don't receive the WebEx invite.

Thanks,

[REDACTED]

.....

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From: [REDACTED]@fb.com]
Sent: 3/13/2020 11:13:52 AM
To: [REDACTED]@cisa.dhs.gov]
CC: [REDACTED]@fb.com]
Subject: Re: Tweet regarding voting & COVID-19 - DISINFORMATION

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Thanks, [REDACTED]!

Sent from my iPhone

On Mar 13, 2020, at 10:55 AM, [REDACTED]@cisa.dhs.gov> wrote:

[REDACTED]

Apparently the tweet I sent has been taken down. Please see the screenshot below with the tweet.

Thanks,
[REDACTED]

From: [REDACTED]@cisa.dhs.gov>
Sent: Friday, March 13, 2020 10:51 AM
To: [REDACTED]@cisa.dhs.gov>
Cc: [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>
Subject: FW: Tweet regarding voting & COVID-19 - DISINFORMATION

From OH in screen shot form and reported to CIOCC.

[REDACTED]
Department of Homeland Security
Cybersecurity & Infrastructure Security Agency (CISA)
[REDACTED]

From: [REDACTED]@OhioSOS.Gov>
Sent: Friday, March 13, 2020 10:39 AM
To: [REDACTED]@OhioSOS.Gov>; [REDACTED]@msisac.org>; [REDACTED]@msisac.org>
Cc: [REDACTED]@cisa.dhs.gov>; [REDACTED]@OhioSOS.Gov>; [REDACTED]@OhioSOS.Gov>; [REDACTED]@OhioSOS.Gov>; [REDACTED]@OhioSOS.Gov>; [REDACTED]@OhioSOS.Gov>
Subject: Tweet regarding voting & COVID-19 - DISINFORMATION

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

The following disinformation regarding upcoming Ohio, Florida, Illinois, Louisiana, and Wisconsin elections and COVID-19 was posted to twitter:

<https://twitter.com/coocbie/status/1238465759745134593?s=21>

<image.png>

<~WRD318.jpg>

[Redacted]

Office of the Ohio Secretary of State

[Redacted]

OhioSoS.gov



Thread



DEAR ALL BOOMERS,

Due to COVID-19, it should be in your highest interest to refrain from entering polling stations in Illinois, Florida, Ohio, Louisiana, and Wisconsin!!!

This is for your own safety.

I repeat, BOOMERS DO NOT VOTE

10:03 AM · 3/13/20 · [Twitter Web App](#)

6 Likes



25m



Tweet your reply



From: [REDACTED]
Sent: 10/26/2020 9:02:43 AM
To: [REDACTED]@twitter.com]
CC: [REDACTED]@twitter.com]; [REDACTED]@twitter.com]; [REDACTED]@hq.dhs.gov];
Misinformation Reports [misinformation@cisecurity.org]
Subject: RE: FW: Case #CIS-MIS000067: Youtube video alleging conspiracy by election administration in Detroit, MI

Thanks [REDACTED].

From: [REDACTED]@twitter.com>
Sent: Monday, October 26, 2020 12:40 AM
To: [REDACTED]@cisa.dhs.gov>
Cc: [REDACTED]@twitter.com>; [REDACTED]@twitter.com>; [REDACTED]@hq.dhs.gov>;
Misinformation Reports <misinformation@cisecurity.org>
Subject: Re: FW: [REDACTED] Youtube video alleging conspiracy by election administration in Detroit, MI

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Thanks, [REDACTED]. We have taken enforcement action for violations of our policy on civic integrity.

Thanks!

On Sun, Oct 25, 2020 at 10:44 PM [REDACTED]@twitter.com> wrote:

Thanks, [REDACTED]. We will escalate.

On Sun, Oct 25, 2020 at 10:43 PM [REDACTED]@cisa.dhs.gov> wrote:

Good evening Team Twitter,

Please see the below and attached reporting from Detroit.

Regards,
[REDACTED]

The Cybersecurity and Infrastructure Security Agency (CISA) of the U.S. Department of Homeland Security (DHS) is not the originator of this information. CISA is forwarding this information, unedited, from its originating source – this information has not been originated or generated by CISA. This information may also be shared with law enforcement or intelligence agencies.

CISA affirms that it neither has nor seeks the ability to remove or edit what information is made available on social media platforms. CISA makes no recommendations about how the information it is sharing should be handled or used

by social media companies. Additionally, CISA will not take any action, favorable or unfavorable, toward social media companies based on decisions about how or whether to use this information.

From: Misinformation Reports <misinformation@cisecurity.org>
Sent: Sunday, October 25, 2020 10:35 PM
To: [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>; [REDACTED]@hq.dhs.gov>; [REDACTED]@2020partnership.atlassian.net; Misinformation Reports <misinformation@cisecurity.org>
Subject: Case # [REDACTED]: Youtube video alleging conspiracy by election administration in Detroit, MI

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Misinformation report: YouTube video, also shared on Twitter, alleging conspiracy by election administration in Detroit, MI

From: [REDACTED]@ferndalemi.gov>
Sent: Sunday, October 25, 2020 10:16 PM
To: Misinformation Reports <misinformation@cisecurity.org>
Cc: [REDACTED]@ferndalemi.gov>; [REDACTED]@detroitmi.gov>; [REDACTED]@google.com>; [REDACTED]@michigan.gov>; [REDACTED]@twitter.com
Subject: Disinformation attack on Youtube and Twitter: "#DETROITLEAKS" video from 10/21/2020

Hello EI-ISAC,

My name is [REDACTED]. I am the [REDACTED] for the City of Ferndale, Michigan. My email address is [REDACTED]@ferndalemi.gov.

I am reporting a disinformation (misinformation) attack video that was posted on YouTube on October 21 and repeatedly posted on Twitter since then, targeting election administration by the City of Detroit and State of Michigan and alleging an organized conspiracy by City and State employees.

The video is titled:

#DETROITLEAKS: State Employees Train Poll Workers to Lie to Voters, Destroy Ballots, Stop Challengers [sic]

The title card (which shows on Youtube's search screens and on some links) is:
"The Vote Fraud Scheme To Steal Michigan"

I have attached a screenshot of this title card, as requested by EI-ISAC.

The video can be found here:

<https://www.youtube.com/watch?v=uHeodzJ5cNM>

It was posted by this user:

<https://www.youtube.com/channel/UCWs1lWcNra9Zf8Xew9mTsw>

It has been posted on Twitter multiple times since October 21, almost entirely by @bigleaguepol ("Big League Politics"), which is a far-right site that appears to primarily invent conspiracy theories and is operated by former Breitbart News employees. The tweets about the video use the same #DETROITLEAKS hashtag as the video title. This account 'teased' the video in a tweet on October 20.

The video takes what it alleges are recordings of "State Employees" (which are more likely City of Detroit Department of Elections employees, although they do not identify themselves in the audio), and misrepresents the audio by using on-screen commentary to misinform the viewer of the video.

- From 2:32 – 4:16, the person in the audio is describing the correct process for a provisional affidavit ballot (also colloquially called a "challenged ballot").
 - At 2:42, the on-screen text claims that *"Before 2020, NO challenged ballot would go into the tabulator."* This is not true. Provisional affidavit ballots, as well as challenged absentee ballots, have always been fed through the tabulator on Election Day. That is exactly why they are prepared as correctly described in the audio (ballot number written on the ballot and covered up with a removable sticker) —which makes the claim at 3:04 completely wrong. Provisional Affidavit ballots always get voted as normal and are placed into the tabulator. Provisional Envelope ballots are sealed individually inside their own envelope (not placed into the tabulator) and are returned to the City Clerk for processing in the following days. These processes are not new to 2020; they have been in place for over a decade.
 - At 3:55, the text incorrectly claims that *"all challenged ballots WILL be counted immediately on Election Night"*, which is wrong. Provisional Affidavit ballots are counted along with all others. Provisional Envelope ballots are not.
 - 4:12 attempts to cast doubt on the process of identifying and removing a ballot deemed uncountable — which would only happen under court order, as only Provisional Envelope ballots would wind up inside the tabulator or the sealed ballot container and need to be retrieved. The video claims *"This will NEVER happen. Unless MAYBE in a recount."* Recounts have little to do with Provisional Affidavit ballots, and the assertion that the justice system would never take action to reverse proven voter fraud is entirely baseless. It serves only to cause the voter to doubt the good intentions of the judiciary and the justice system.
- At 4:20, the video refers to the Clerk's Office Voter Registration Receipt as *"an easily-forged piece of paper"*. Again, this is a baseless accusation intended only to denigrate the legal election process and cause the video viewer to feel fear and doubt the security of Michigan's election.
- At 7:30, the video insinuates that simply using *"children"* (16- and 17-year olds, allowed under state law) as election inspectors is an intentional part of a conspiracy to intentionally undermine the election.
- At 9:04, the audio and the on-screen captions describe an absentee ballot that has been *"Sent and received"*, meaning the Clerk has received the voted ballot from the voter and recorded it as such. This would have happened multiple days prior to the election. At 9:14, the video immediately turns around and ignores that by presenting a hypothetical 'scenario' where the voter might not have returned that very same ballot. This is completely contradictory, and is a total misrepresentation of the audio from the actual training scenario that has been recorded. At 9:23, the trainer in the audio even specifically says *"You've already voted."*

This video is misinformation and disinformation because it repeatedly takes normal processes being correctly described as written in state law, and alleges in on-screen text that they are somehow problematic, or will not be followed. On multiple occasions, the on-screen text directly contradicts the audio. However, these are items that would likely only stick out to an election administrator; a member of the general public would follow the video's lead and assume that there is somehow a problem being described. Furthermore, the video makes outright false claims, alleging actions that are prohibited under Michigan election law.

Copied on this email are the following individuals and offices, per the directions from EI-ISAC:

- [REDACTED] City of Ferndale
- [REDACTED] City of Detroit Department of Elections
- Bureau of Elections at the Michigan Department of State
- Civics Outreach office at Google
- Government office at Twitter

This video is an attack on the City of Detroit, the State of Michigan, and by direct extension, all local election administrators in the state of Michigan, such as myself. This will disinform voters outside Detroit as easily as voters inside Detroit. Indeed, the choice of words throughout the video and in the calls to action at the end of the video infer that the video's audience is primarily people who are not Detroit residents. If that audience can be spurred to create unrest in Detroit, they can easily do the same in other jurisdictions, such as my jurisdiction as Detroit's immediate northern neighbor.

Thank you for your investigation and action. If I can be of any further assistance, please let me know and I will be happy to provide support.

Best,

[REDACTED]
[REDACTED]
City of Ferndale

[REDACTED]

.....

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From: [REDACTED]
Sent: 10/2/2020 7:28:36 PM
To: [REDACTED]@fb.com]; [REDACTED]@fb.com]
Subject: FW: Case #CIS-MIS000026: Facebook misinformation regarding absentee ballots mailed out in Scott County, IA.
Attachments: IMG_4219.PNG; IMG_4220.PNG; IMG_4221.PNG; IMG_4222.PNG

Good evening,

Because who doesn't like to start their weekend with some election related disinfo, I'm sharing a report from Scott County, IA. As usual, anything you can share on how you all handled the report is appreciated.

[REDACTED]

The Cybersecurity and Infrastructure Security Agency (CISA) of the U.S. Department of Homeland Security (DHS) is not the originator of this information. CISA is forwarding this information, unedited, from its originating source – this information has not been originated or generated by CISA. This information may also be shared with law enforcement or intelligence agencies.

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From: Misinformation Reports <misinformation@cisecurity.org>
Sent: Friday, October 2, 2020 6:09 PM
To: [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>; [REDACTED]@hq.dhs.gov>; [REDACTED]@2020partnership.atlassian.net; Misinformation Reports <misinformation@cisecurity.org>
Subject: Case #CIS-MIS000026: Facebook misinformation regarding absentee ballots mailed out in Scott County, IA.

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Misinformation report from Scott County, IA

From: [REDACTED]@msisac.org>
Sent: Friday, October 2, 2020 5:54 PM
To: Misinformation Reports <misinformation@cisecurity.org>
Subject: FW: Facebook misinformation

In response to your last email to eric.

From: [REDACTED]@sos.iowa.gov>
Sent: Friday, October 2, 2020 3:28 PM
To: [REDACTED]@msisac.org>; [REDACTED]@msisac.org>; [REDACTED]@iowa.gov>; [REDACTED]@dps.state.ia.us>; [REDACTED] FBI #4 (FBI) FBI #4 @fbi.gov>; [REDACTED]@hq.dhs.gov>
Cc: [REDACTED]@sos.iowa.gov>; [REDACTED]@sos.iowa.gov>
Subject: Fwd: Facebook misinformation

CONFIDENTIAL

Please see this report of possible misinformation posted on Facebook. We received it from the Scott County [REDACTED] I've confirmed that [REDACTED] is a registered voter in Scott County, IA.

Absentee ballots will not be mailed out in Iowa until Monday, October 5.

Forwarding for visibility.

Let me know if you have more questions.

Get [Outlook for iOS](#)

From: [REDACTED]@sos.iowa.gov>
Sent: Friday, October 2, 2020 12:54 PM
To: [REDACTED]
Subject: FW: Facebook misinformation

From: [REDACTED]@gmail.com>
Sent: Friday, October 2, 2020 11:33 AM
To: [REDACTED]@sos.iowa.gov>
Subject: Fwd: Facebook misinformation

As per the incident report I am moving forward with inaccurate information posted on Facebook. Of course we have not mailed out ballots yet, therefore false information. Can you tell me what action will be taken

[REDACTED]

----- Forwarded message -----
From: [REDACTED]@gmail.com>
Date: Thu, Oct 1, 2020, 8:57 PM
Subject: Facebook misinformation
To: [REDACTED]@gmail.com>

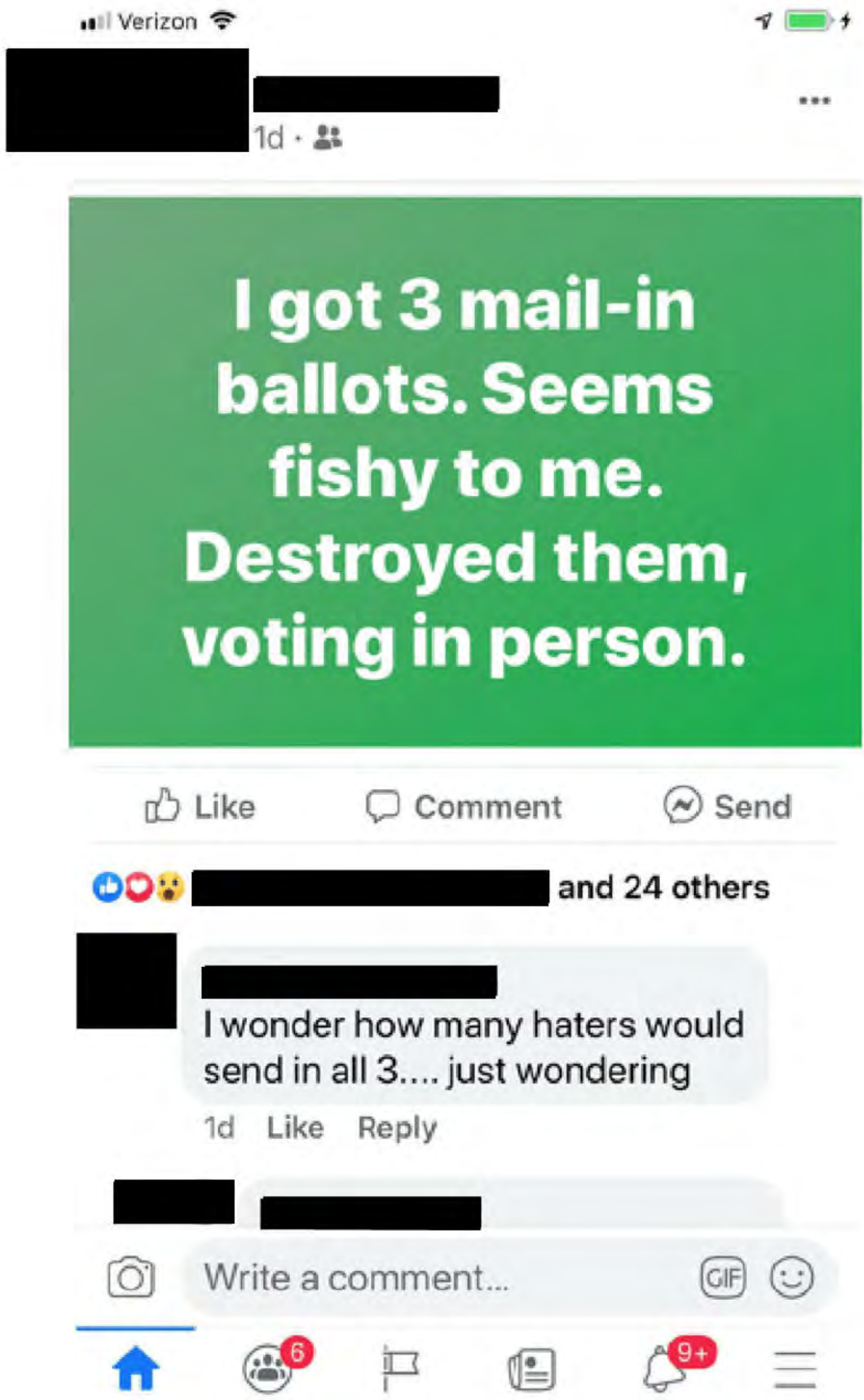
Sent from my iPhone

CONFIDENTIAL

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.....





[Redacted]'s Post



[Redacted]

AMEN TO THAT....

1d Like Reply



[Redacted]

Good for you. My relatives called city hall and reported it. I told them to call the local TV stations and see if they put it on the air. Any bets?

1d Like Reply



View 4 previous replies...



[Redacted] registered independent or not, you are backing the Republican party of Trump this year, as evidenced by many of your posts and comments.

1d Like Reply



[Redacted] I vote on



Write a comment...





[Redacted]'s Post



Like Reply



[Redacted]
Good for you. My relatives called city hall and reported it. I told them to call the local TV stations and see if they put it on the air. Any bets?

1d Like Reply



[Redacted] They sure should! This reeks of corruption!

1d Like Reply



They only dwell on news that benefits one side. Plus they don't want Davenport or the state looking corrupt.

1d Like Reply



[Redacted] is a Republican so I guess that means it would benefit the



Write a comment...





[Redacted]'s Post



Like Reply

[Redacted] is a Republican so I guess that means it would benefit the Republican party, not the Democrats, if she were to submit these illegitimate ballots, which she cannot do. Iowa hasn't even mailed ballots out yet. It seems to me that someone out there is purposely trying to stir up trouble and cause doubt. Maybe the ballots she received should have been brought to the attention of the county auditor.

1d Like Reply



[Redacted] If you're talking about this [Redacted] I'm a registered independent. Be sure of your facts before you state them.



Write a comment...



[REDACTED]@hhs.gov]; [REDACTED]@hud.gov; [REDACTED]@lafcc.org; [REDACTED]@hud.gov;
 [REDACTED]@ashenola.org; [REDACTED] (NIH/NHLBI) [REDACTED]@nih.gov]; [REDACTED]@unicef.org; [REDACTED]@who.int;
 [REDACTED]@gavi.org [REDACTED]@gavi.org; [REDACTED]@ecdc.europa.eu; [REDACTED]@who.int; [REDACTED]@cdph.ca.gov;
 [REDACTED]@CDPH [REDACTED]@cdph.ca.gov]; [REDACTED]@emory.edu; [REDACTED]@emory.edu;
 [REDACTED]@mail.wvu.edu; [REDACTED]@CO.RAMSEY.MN.US; [REDACTED]@utah.gov;
 [REDACTED]@cookcountyhealth.org; [REDACTED]@shelbycountyttn.gov; [REDACTED]@lincoln.ne.gov;
 [REDACTED]@schd.org; [REDACTED]@hud.gov [REDACTED]@georgetown.edu; [REDACTED]@gmail.com;
 [REDACTED]@gmail.com; [REDACTED]@wyo.gov; [REDACTED] (CDC wyo.gov)
 [REDACTED]@wyo.gov]; [REDACTED]@wyo.gov [REDACTED]@dhsoha.state.or.us;
 [REDACTED]@dhsoha.state.or.us [REDACTED]@baymills.org; [REDACTED]@baymills.org; [REDACTED]@baymills.org;
 [REDACTED] (HHS/OASH) [REDACTED]@hhs.gov]; [REDACTED] CDC cdcfoundation.org)
 [REDACTED]@cdcfoundation.org] [REDACTED]@houstontx.gov; [REDACTED] (CDC la.gov)
 [REDACTED]@la.gov]; [REDACTED]@la.gov [REDACTED]@wustl.edu]; [REDACTED]@wustl.edu;
 [REDACTED] (CDC alianzaamericas.org) [REDACTED]@alianzaamericas.org] [REDACTED]@gmail.com [REDACTED]@latinoaid.org;
 [REDACTED]@gmail.com [REDACTED]@latinoaid.org [REDACTED] (OS/ASPR/OEM) [REDACTED]@hhs.gov]; [REDACTED]
 [REDACTED]@ardenthealth.com]; [REDACTED]@dhsoha.state.or.us; [REDACTED]@michigan.gov;
 [REDACTED] CDC aamc.org) [REDACTED]@aamc.org] [REDACTED]@cmadocs.org [REDACTED]@cmadocs.org;
 [REDACTED]@karna.com [REDACTED]@karna.com] [REDACTED]@dhs.wisconsin.gov;
 [REDACTED]@tamu.edu; [REDACTED]@pa.gov; [REDACTED]@health.nyc.gov; [REDACTED]@optum.com;
 [REDACTED]@dhs.wisconsin.gov; [REDACTED]@gavi.org; [REDACTED] CDC wyo.gov)
 [REDACTED]@wyo.gov]; [REDACTED]@fema.dhs.gov; [REDACTED]@vidanthealth.com;
 [REDACTED]@communicatehealth.com; [REDACTED] (CDC dhec.sc.gov) [REDACTED]@dhec.sc.gov]; [REDACTED]
 [REDACTED]@vdem.virginia.gov; [REDACTED]@maryland.gov; [REDACTED]@USE.SalvationArmy.Org;
 [REDACTED]@vdem.virginia.gov; [REDACTED]@vdem.virginia.gov; [REDACTED]@ebsleaders.com;
 [REDACTED]@gstreetgroup.com; [REDACTED]@gstreetgroup.com; [REDACTED]@wv.gov; [REDACTED]@civcnation.org;
 [REDACTED]@cdcfoundation.org; [REDACTED]@redcross.or.ke; [REDACTED]@canada.ca;
 [REDACTED]@fema.dhs.gov [REDACTED]@phe.gov.uk]; [REDACTED]@gmx.de;
 [REDACTED]@gmail.com; [REDACTED]@gmail.com; [REDACTED]@gmail.com; [REDACTED]@columbia.edu; [REDACTED]
 [REDACTED]@who.int]; [REDACTED]@who.int; [REDACTED]@ird.fr; [REDACTED]@who.int;
 [REDACTED]@un.org; [REDACTED]@gmail.com [REDACTED]@scienceupfirst.com [REDACTED]@gmail.com;
 [REDACTED]@paho.org; [REDACTED]@yahoo.com; [REDACTED]@ku.edu.kw; [REDACTED]@disabilityrightspa.org;
 [REDACTED]@ucsf.edu; [REDACTED]@odh.ohio.gov; [REDACTED]@odh.ohio.gov;
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 [REDACTED]@odh.ohio.gov [REDACTED]@phmc.org; [REDACTED]@phmc.org; [REDACTED]@phmc.org;
 [REDACTED]@phmc.org [REDACTED]@phmc.org [REDACTED]@phmc.org; [REDACTED]
 [REDACTED]@hhs.gov] [REDACTED] (HHS/ASPE) [REDACTED]@hhs.gov]; [REDACTED] (OS/ASPE)
 [REDACTED]@hhs.gov]; [REDACTED] (HHS/ASPE) [REDACTED]@hhs.gov] [REDACTED]@allnations.health;
 [REDACTED]@allnations.health; [REDACTED]@allnations.health [REDACTED]@awhonn.org; [REDACTED]@vtc.vsc.edu;
 [REDACTED]@gmail.com [REDACTED] (IHS/PHX) [REDACTED]@ihs.gov [REDACTED] (IHS/PHX)
 [REDACTED]@ihs.gov]; [REDACTED] (IHS/PHX) [REDACTED]@ihs.gov]; [REDACTED] (IHS/PHX)
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 [REDACTED]@ihs.gov]; [REDACTED]@acnm.org; [REDACTED] (CDC acog.org) [REDACTED]@acog.org]; [REDACTED]
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 [REDACTED]@cpca.org; [REDACTED]@oakgov.com; [REDACTED]@gmail.com; [REDACTED]@jh.edu;
 [REDACTED]@jhu.edu; [REDACTED]@donaanacounty.org [REDACTED]@locuststreet.com; [REDACTED]@ohsu.edu;
 [REDACTED]@aetna.com; [REDACTED] (OS/OASH) [REDACTED]@hhs.gov]; [REDACTED] (OS/OASH)
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 dhsoha.state.or.us) [REDACTED]@dhsoha.state.or.us]; [REDACTED]@pirg.org; [REDACTED]
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 [REDACTED]@cabinetoffice.gov.uk; [REDACTED] (OS/OGA) [REDACTED]@hhs.gov]; [REDACTED]
 [REDACTED]@associates.hq.dhs.gov]; [REDACTED]@HQ.DHS.GOV]; [REDACTED]
 [REDACTED] (OS/OGA) [REDACTED]@hhs.gov] [REDACTED] (HHS/DGA) [REDACTED]@hhs.gov];
 [REDACTED]@cabinetoffice.gov.uk; [REDACTED]@hsph.harvard.edu]; [REDACTED]@who.int; [REDACTED]@who.int;
 [REDACTED]@who.int; [REDACTED]@who.int]; [REDACTED]@phe.gov.uk;
 [REDACTED]@phe.gov.uk; [REDACTED]@phe.gov.uk; [REDACTED]@nhs.net; [REDACTED]@nhs.net; [REDACTED]
 [REDACTED]@surgoventures.org]; [REDACTED]@surgoventures.org;

[REDACTED]@surgoventures.org; [REDACTED]@surgoventures.org; [REDACTED]
 [REDACTED]@surgoventures.org; [REDACTED] CDC (imls.gov) [REDACTED]@imls.gov; [REDACTED] (NIH/NLM) [E]
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 (OS/OASH) (CTR) [REDACTED]@hhs.gov; [REDACTED]@hhs.gov; [REDACTED] (OS/ASPR/IO)
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 [REDACTED]@cookcountyhhs.org; [REDACTED]@gmail.com; [REDACTED]@federalhillhouse.org; [REDACTED] (OS/OASH)
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 (CDC health.ny.gov) [REDACTED]@health.ny.gov; [REDACTED]@vt.edu; [REDACTED]@uw.edu;
 [REDACTED]@uw.edu; [REDACTED]@uw.edu; [REDACTED]@uw.edu; [REDACTED]@orangecountygov.com;
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 [REDACTED]@urban.org; [REDACTED]@oakgov.com [REDACTED]@gmail.com; [REDACTED]@me.com;
 [REDACTED]@dhsoha.state.or.us; [REDACTED]@npr.org; [REDACTED]@health.nyc.gov; [REDACTED]@vituity.com;
 [REDACTED] (IHS/HQ) [REDACTED]@ihs.gov; [REDACTED]@health.nyc.gov; [REDACTED]@urban.org; [REDACTED] (CDC
 health.nyc.gov) [REDACTED]@health.nyc.gov; [REDACTED]@childrens.harvard.edu [REDACTED]@oakgov.com;
 [REDACTED]@gmail.com; [REDACTED]@gmail.com [REDACTED]@phmc.org [REDACTED]@phmc.org;
 [REDACTED]@wyo.g [REDACTED]@comcast.net; [REDACTED]@uth.tmc.edu; [REDACTED]@gmail.com;
 [REDACTED]@health.nyc.gov; [REDACTED] (CDC arkansas.gov) [REDACTED]@arkansas.gov; [REDACTED]
 [REDACTED]@wustl.edu; [REDACTED]@jhu.edu [REDACTED] (OS/ASPR/SIIM) [REDACTED]@hhs.gov;
 [REDACTED]@schsa.org; [REDACTED]@CDPH [REDACTED]@cdph.ca.gov] [REDACTED]@CDPH
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 [REDACTED]@CDPH [REDACTED]@cdph.ca.gov]; [REDACTED]@CDPH [REDACTED]@cdph.ca.gov]; [REDACTED]
 [REDACTED]@cdph.ca.gov; [REDACTED]@southcentralfoundation.com; [REDACTED]@sebs.rutgers.edu;
 [REDACTED]@dhs.wisconsin.gov; [REDACTED]@dhsoha.state.or.us; [REDACTED] EOP/NSC
 [REDACTED]@nsc.eop.gov]; [REDACTED]@co.wahkiakum.wa.us; [REDACTED]@icloud.com;
 [REDACTED]@modernatx.com; [REDACTED]@stlrhc.org; [REDACTED]@columbiacountyor.gov; [REDACTED]@CDPH
 [REDACTED]@cdph.ca.gov]; [REDACTED]@cdph.ca.gov; [REDACTED]@cdph.ca.gov;
 [REDACTED]@dhs.arkansas.gov; [REDACTED]@stlouis-mo.gov [REDACTED]@illinois.gov; [REDACTED]
 (CMS/OPOLE) [REDACTED]@cms.hhs.gov] [REDACTED] (OS/OASH) [REDACTED]@hhs.gov; [REDACTED]
 (IHS/POR) [REDACTED]@ihs.gov; [REDACTED] (HHS/IGA) [REDACTED]@hhs.gov; [REDACTED] (HRSA)
 [REDACTED]@hrsa.gov] [REDACTED]@auab.afcent.af.mil; [REDACTED].civ@mail.mil [REDACTED]@us.af.mil;
 childsc@who.int; [REDACTED] (CDC civcnation.org) [REDACTED]@civcnation.org [REDACTED]@wustl.edu;
 [REDACTED]@stlrhc.org; [REDACTED]@dshs.texas.gov; [REDACTED]@mail.mil;
 [REDACTED]@mail.mil

Subject: COVID-19 State of Vaccination Confidence Insights Report #26
Attachments: SoVC_report26.pdf

Hello partners and colleagues,
 The attached COVID-19 State of Vaccine Confidence Insights Report #26 emphasizes major themes influencing COVID-19 vaccine hesitancy and uptake, categorized by their level and type of threat to vaccine confidence, degree of spread, and directionality. By examining how Americans think and feel, social processes, and the practical issues around vaccination, the Insights Report seeks to identify emerging issues of misinformation, disinformation, and places where intervention efforts can positively impact vaccine confidence across the United States. You can find back-issues of the [COVID-19 State of Vaccine Confidence Insights](#)

[Reports](#) online. For the ways you can take action on these themes, go to the "Ways to Act" section in the report.

SPECIAL UPDATE: CDC partners can now report COVID-19-related rumors directly to CDC. To report a rumor, go to: www.cdc.gov/report-rumors and start the subject line with: "Rumors:" In the question box, give as much information about the rumor as you can, such as a description of the rumor, where you heard it, and how many times you have heard it.

The following link contains social media resources such as graphics, language, and social media calendars that our partners can use to address the issues raised in this report: [REDACTED]

Email us at [REDACTED]@cdc.gov if you have any questions about the report, or if you are interested in support to address the themes in this report.

Thank you for reading and for your continued support of this work! Below are the highlights from the most recent Insights Report:

Major Themes

Discussions of the impact of current and future variants increased with the emergence of the Omicron BA.2 variant.

- Given domestic decreases in case counts and news stories about maintaining congressional pandemic-related funds in the future, some feel that the worst of the pandemic has passed. The aforementioned conditions, when coupled with a belief that there are high levels of immunity from vaccination, boosting, and prior infection in the general population, may provide justification for unvaccinated consumers to forego vaccination.
- Some research suggests there is an inadequate supply of vaccines to boost eligible populations. However, the development and purchase of additional vaccines may be met with some resistance given pandemic fatigue, a popular desire to be rid of preventive measures, and decreases to both funding²⁸ and public concerns about variants.
- A recent poll reported that 76% of unvaccinated individuals said they have no intention to vaccinate. This percentage has remained stable for several reporting periods. In this same poll, 29% of vaccinated adults who have not received a booster dose said they will never get a booster dose while 45% said they would wait to get a booster dose. Of those that said they would wait to get a booster dose, 66% said they do not know how long they will wait.
- Popular support for the repeal of federal, state, and local governments lifting all COVID-19 restrictions has increased to 64%, an increase of 20 percent since early February.

Misinformation Themes

- Asymptomatic transmission is a false narrative and mass testing is pointless.
- Infection-induced immunity, also referred to as "natural immunity," negates the need to vaccinate despite SARS-CoV-2 variants.
- Messages concerning new variants are to create fear or to maintain and reclaim power.
- COVID-19 vaccines cause variants.

Consumers discussed the safety and effectiveness of booster doses, especially after the authorization of a 2nd booster dose.

- In light of booster dose authorizations for both Moderna and Pfizer-BioNTech COVID-19 vaccines, individuals are seeking the most effective mix and match combination.
- Lack of funding for COVID-19 mitigation measures and vaccine doses may negatively impact vaccine booster dose uptake.
- Consumers are concerned that waning immunity from the initial booster dose indicates a consistent need for booster doses. Pandemic fatigue, coupled with already low booster uptake, may negatively impact rates of COVID-19 booster uptake.

Misinformation Themes

- A 2nd booster dose was only authorized for big pharma profits.
- A 2nd booster dose was only authorized because the COVID-19 vaccine is ineffective.
- The booster dose will not be effective because it was developed for the original 2019 strain of the virus.

Consumers express concerns and opposition to COVID-19 vaccines for children.

- Some social media users believe that COVID-19 vaccines are ineffective at stopping COVID-19 or the spread of the virus in children.
- Government officials made public statements against vaccines for healthy children.
- Consumers are worried about the unknown side effects of COVID-19 vaccines in children, such as myocarditis.
- Some consumers believe that the COVID-19 vaccine is not warranted in children because they are considered a low-risk population with minimal health effects from the virus and have a low death rate.

Misinformation Themes

- Children who are healthy do not need to receive the COVID-19 vaccine.
- COVID-19 vaccines are ineffective and are not required for children.
- The COVID-19 vaccine is an experiment on children and is not needed because children can build “natural immunity” through virus exposure.
- Children vaccinated against COVID-19 are up to 52 times more likely to die following COVID-19 vaccination than unvaccinated children.

New and emerging theme that may impact vaccine confidence

Consumers continue to discuss the safety of the COVID-19 vaccines, especially related to reports of tinnitus and hearing loss vaccination.

- Social media users discussed their belief that the COVID-19 vaccine causes tinnitus and hearing loss while others posted about how the incidence of hearing loss and tinnitus after vaccination was so low that it was not a concern.
- News outlets and some social media users continued to discuss the impact of the COVID-19 vaccines on fertility and pregnancy.
- Discussions of vaccine-related fertility and pregnancy concerns increased by 16% (52,900 mentions) during this reporting period.

- Several studies were released during this reporting period that presented evidence that infection with the virus that causes COVID-19 can impact the reproductive system of males and females.

Misinformation themes

- WHO said that the COVID-19 vaccines definitely cause hearing loss.
- COVID-19 vaccines cause reproductive health problems such as miscarriages, premature birth, genetic disorders in fetuses, and infertility.
- COVID-19 vaccines contain “strange life forms” and can be transcribed into human DNA.
- COVID-19 vaccines are not vaccines but experimental gene therapy.
- COVID-19 vaccines cause recipients to develop vaccine-induced acquired immune deficiency syndrome (VAIDS).

Continuing and evolving theme that may impact vaccine confidence

Consumers and news outlets discussed the effectiveness and availability of COVID-19 treatments.

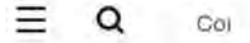
- Some have expressed fears about an inability to partake in the Test-to-Treat program if pharmacists aren't authorized to prescribe COVID therapeutics. Despite demand, there are reports that many therapeutics remain unused.
- There are concerns that rural and underserved communities are less likely to receive COVID-19 therapeutics or to have access to a health care provider.
- Some have voiced concerns that COVID-19 vaccine and treatment disparities may worsen because the federal spending bill passed on March 15 did not include funding for future COVID-19 mitigation measures.
- Some consumers are asking if they can take vitamin C and vitamin D to boost the immune system against COVID-19.

[REDACTED]

National Center for Immunization and Respiratory Diseases | Immunization Services Division
U.S. Centers for Disease Control and Prevention

From: [REDACTED]
Sent: 6/30/2021 7:50:15 AM
To: [REDACTED]@twitter.com]
Subject: RE: COVID Misinformation

Hi [REDACTED] – I've been trying to enter info but I realize I've been unclear on where to enter them. I went to /forms and there is a drop down on things to submit but none of them seem relevant to misinformation. Am I in the right place?



- es
- ck accounts on
- ite accounts on
- Twitter myths
- r Rules

[Contact Us](#) > [Partner Support](#)

Report any issue to get priority service

What type of problem are you having with your Twitter account? (required)

From: [REDACTED]@twitter.com>
Sent: Thursday, May 27, 2021 2:30 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@reingold.com> [REDACTED]@reingold.com>; [REDACTED]
[REDACTED]@cdc.gov>
Subject: Re: COVID Misinformation

Hi all - [REDACTED] you should now be fully. When you visit the Twitter help center logged in with your account you should see additional reporting options.

On Mon, May 24, 2021 at 3:14 PM [REDACTED]@twitter.com> wrote:

Thanks for letting me know - I've just sent a note to our team requesting an update.

On Mon, May 24, 2021 at 3:06 PM [REDACTED]@cdc.gov> wrote:

I haven't seen anything come through so far.

From: [REDACTED]@twitter.com>
Sent: Monday, May 24, 2021 2:57 PM
To: [REDACTED]@reingold.com>
Cc: [REDACTED]@cdc.gov>; [REDACTED]@reingold.com>; [REDACTED]
[REDACTED]@cdc.gov>
Subject: Re: COVID Misinformation

Hi [REDACTED] and I had a sidebar and I requested her account be enrolled. Your email reminds me that the process should have been completed by now - I'll check with on our team to make sure she's properly enrolled.

On Mon, May 24, 2021 at 2:28 PM [REDACTED]@reingold.com> wrote:

Hi [REDACTED]

I hope you had a good weekend. I'm following up about the partner support portal enrollment for CDC. Does the Twitter account need to be connected to a [cdc.gov](https://www.cdc.gov) email or is any account fine? Also, would there be any issues or complications stemming from flagging COVID misinformation on the portal using the existing [census.gov](https://www.census.gov) accounts that have access? We'll want to have at least some CDC accounts whitelisted, but that backup may be helpful in the short-term.

Let us know any next steps we can take to make sure CDC is all set with the portal.

Thanks,

[REDACTED]

Reingold

[REDACTED]

[reingold.com](https://www.reingold.com)

We're on a mission. ***Yours.***

From: [REDACTED]
Sent: Tuesday, May 11, 2021 8:50 AM
To: [REDACTED]@twitter.com>
Subject: RE: COVID Misinformation

Does it need to be the CDC account or my personal? If CDC, I'm going to have someone on staff enroll instead of me.

If personal is OK, it is: [REDACTED]

From: [REDACTED] <[REDACTED]@twitter.com>

Sent: Monday, May 10, 2021 8:51 PM

To: [REDACTED] <[REDACTED]@cdc.gov>

Cc: [REDACTED] <[REDACTED]@reingold.com>; [REDACTED] <[REDACTED]@reingold.com>; [REDACTED] <[REDACTED]@census.gov>; [REDACTED] <[REDACTED]@cdc.gov>

Subject: Re: COVID Misinformation

Hi [REDACTED] -

I'd be glad to enroll you in our Partner Support Portal, which allows you a special, expedited reporting flow in the Twitter Help Center. It worked very well with Census colleagues last year.

You need a Twitter account (and to be logged into that account) to access the Partner Support Portal. What account (or accounts) would you like me to enroll?

Best,
[REDACTED]

On Mon, May 10, 2021 at 5:05 PM [REDACTED] <[REDACTED]@cdc.gov> wrote:

[REDACTED] - I don't think we have info on how to enroll but we'd be happy to get on if you can send some info.

Thanks.

From: [REDACTED] <[REDACTED]@twitter.com>

Sent: Monday, May 10, 2021 3:02 PM

To: [REDACTED] <[REDACTED]@cdc.gov>

Cc: [REDACTED] <[REDACTED]@reingold.com>; [REDACTED] <[REDACTED]@reingold.com>; [REDACTED] <[REDACTED]@census.gov>; [REDACTED] <[REDACTED]@cdc.gov>

Subject: Re: COVID Misinformation

Hi [REDACTED] -

Thanks for sharing this - agree these are important trends to note; a quick scan shows that at least some of these have been previously reviewed and actioned. I will now ask the team to review the others.

[REDACTED] remind me: did you have a chance to enroll in our Partner Support Portal? In the future, that's the best way to get a spreadsheet like this reviewed.

Best,
[REDACTED]

On Mon, May 10, 2021 at 1:50 PM [REDACTED]@cdc.gov wrote:

[REDACTED]

We wanted to point out two issues that we are seeing a great deal of misinfo about – vaccine shedding and microchips. The below are just some example posts. We do plan to post something shortly to address vaccine shedding and I can send that link soon. Our census team copied here, has much more info on it if needed.

Also, we are standing up a BOLO COVID misinformation meeting and inviting all tech platforms. We are shooting for 12pm EST on Friday for our first meeting. I'll include you on the invite but if you'd like to propose an alternative approach or would like to me include others, just let me know.

Thanks!

Post Text	Link
MAGNET STICKS TO AREA INJECTED BY THE VACCINE- ARE THE VACCINATED GETTING MICROCHIPPED? #justsayno	https
<p>The ex VP of Pfizer came out predicting that there will be a human depopulation of the vaccinated people in 2 years. An even shorter lifespan after the booster. He believes it's eugenics. Many scientists are corroborating this.</p> <p>I'll be alive!</p> <p>Experimental vaccines!</p>	https
THE BIG QUESTION IS WHY ARE THEY LYING...GOVERNMENTS SIGNED US AWAY TO NWO..DEPOPULATION..ALSO EXPERIMENTS IN AI..IN LAYMENS TERMS..TRYING TO TURN US INTO ROBOTS/ ANDROIDS....ALSO THEY WANT WORLD BANK OF OUR DNA .. VIA VAX	https
<p>Agreed. But if the science is being followed, there's an awful lot of evidence that the vax crowd are shedding...maybe the non-vaxxed are safer this way...thoughts</p> <p>@crislerwyo</p> <p>?</p>	https
COVID 'Vaccine Shedding', Evidence SARS-CoV-2 Spike Protein Can 'Alter Human Genes' & VAERS Truth	https
Thank Bill Gates for wanting depopulation. That's exactly what this vaccine is doing, and will continue to do over the next few years.	https
IM ALARMED BY THE AMOUNT OF WOMEN IN MY DM'S COMPLAINING ABOUT ABNORMAL BLEEDING AND MISCARRIAGES AFTER COMING IN CONTACT WITH SOMEONE WHOSE BEEN VACCINATED!!!!	https
Well hundreds of women on this page say they are having bleeding/ clotting after vaccination or that they bleed oddly being AROUND vaccinated women. Unconfirmed, needs more investigation. But lots of reports. COVID-19 Vaccine Side Effects	https

<p>[Links to: https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/]</p>	<p>https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/</p>
<p>So the #CDC now says that those who are "Fully Vaxed nated" can "Go outside & live freely" lol.. This is a joke .</p> <p>Quick questions for those who were experimented on I MEAN -Took the shot, what were the ingredients in it? You did ASK right? .. Also, do you know what SHEDDING is?</p>	<p>https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/</p>
<p>Here is the official Pfizer trail protocols Concerning shedding by the vaccinated Fertility (male and female) contraception to be compulsorily used because shedding Adverse events and serious adverse events reporting And much more Dangers ore known</p> <p>https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf</p>	<p>https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/</p>
<p>For those of you who have questions about Spiked Protein SHEDDING: Pfizer admits in its own mRNA vaxx trial documentation that non-vaxxed people can be ENVIRONMENTALLY EXPOSED to the shot's spike proteins by INHALATION or SKIN CONTACT.</p> <p>https://themostrbeautifulworld.com/blog/skin-contact-covid</p>	<p>https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/</p>
<p>Pfizer acknowledges the existence of "SHEDDING" in their #mRNA vaccines, and is setting up this new trial to study these dangers.</p> <p>(Shedding is where unvaccinated people experience serious health issues just by being near to vaccinated people).</p> <p>https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf#page67</p>	<p>https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/</p>



CAUTION: This message originated externally. Please use caution when clicking on links or opening attachments.

From: [REDACTED]@fb.com]
Sent: 6/1/2021 3:01:32 PM
To: [REDACTED]@cdc.gov; [REDACTED]@cdc.gov; [REDACTED]@cdc.gov; [REDACTED]@cdc.gov; [REDACTED]@census.gov; [REDACTED]@cdc.gov; [REDACTED]@reingold.com; [REDACTED]@reingold.com; [REDACTED]@reingold.com; [REDACTED]@cdc.gov]
Subject: Misinfo Claim Onboarding Follow Up
Attachments: CDC_-How-to-report-through-Facebook-Government-Casework-Channel-1 (1).pdf; CDC-Onboarding-Deck (1).pdf

Hi All,

Welcome back from Memorial Day!

Making sure everyone who has been whitelisted to our misinfo claims portal has all the info they need to start submitting claims. (A few helpful files attached.)

If anyone has any specific questions, please let us know!

[REDACTED]

[REDACTED]
facebook, inc. | [REDACTED]
[REDACTED]

How to report through Facebook Government Casework Channel?

Our reporting system consists of three stages: authentication portal, reporting form, and final landing page.

1. Authentication portal

- a. Request access (log in to the portal) through our portal <https://www.facebook.com/xtakedowns/login/>
- b. Upon successful authentication, a disposable link will be generated and sent to the email address used for the authentication. The optional name field can be used for identifying each authentication when the email address is shared by multiple officials.

2. Reporting form

- a. The disposable link that's obtained upon authenticating through the portal leads to a reporting form. It consists of reporting reasons, a field for violating URLs, optional comment field, and attachment.
- b. Indicate the reason for reporting by selecting the listed reasons: Political Advertisements, Harassment, Hate Speech, Voter Interference, Other. Upon selecting the reason, it will guide you with specific requirements to process the request.
- c. Add relevant violating URLs one per line. Please make sure you submit only advertisement links when you are reporting 'Political Advertisements'.
- d. If the URL is not valid, an error message will pop up to indicate that invalid URLs have been added. Should you have more than 20 URLs to report, please file another report.
- e. If you have any additional context to share, please use the optional field to add any comment and/or attachment option.

3. Final landing page

- a. Upon submitting the report, a reference number appears before being redirected to the landing page.
- b. Final landing page is our help center that has a variety of resources such as policies and frequently asked questions.
- c. A confirmation email with the same reference number will be sent to the email address used for authentication.

CDC Onboarding

May 19th, 2021



Facebook Community Standards



Content Policy Team - Who are we?



11 Global
Offices



Diverse Team with backgrounds
in

Europe

North America

Asia

Law & Law
Enforcement

Human Rights,
NGOs & Public
Policy

Business &
Communications

Community Standards

Community Standards


Home Recent Updates

Search the Community Standards

Introduction

- › I. Violence and Criminal Behavior
- › II. Safety
- › III. Objectionable Content
- › IV. Integrity and Authenticity
- › V. Respecting Intellectual Property
- › VI. Content-Related Requests
- › Additional Information

Community Standards



INTRODUCTION

Every day, people use Facebook to share their experiences, connect with friends and family, and build communities. We are a service for more than two billion people to freely express themselves across countries and cultures and in dozens of languages...

Our Policies Cover

Violence and Criminal
Behaviour

Safety

Objectionable Content

Integrity and Authenticity

Intellectual
Property

Content-Related
Requests

Including...

Self Harm

Coordinating
Harm

Dangerous
Organizations

Hate Speech

Cruel & Insensitive
Humor

Credible Threats

Bullying /
Harassment

Sexual Exploitation

Scams / Fraud

Commercial Spam

Privacy / Identity
Theft

Hacked Accounts

Deceased
Members

Celebrating Crime

Adult Nudity &
Sexual Activity

Graphic Violence

Regulated Goods

We empower and safeguard users with policies that are:



.Principled

Rooted in our mission to build community and bring people together



.Operable

Applied by reviewers in a way that is consistent and fair



.Explicable

Clearly understandable all over the world

Policy Development and Implementation



Who we work with

We bring together experts and groups with different perspectives to develop policies that are relevant, fair and locally-responsive.

At Facebook

- Legal experts
- Security engineers
- Product and design
- Safety operations
- User experience team
- Data and Analytics
- Communications and Public Policy

Policy
Outreach

Outside of Facebook

- Academic researchers
- Local Non-profits
- Safety Orgs
- Law Enforcement
- Lawmakers & Legal Counsel
- Civil & Human rights activists

Covid & Vaccine Misinformation



OUR WORK

- 01 Bringing 50 million people a step closer to vaccinations
- 02 Combating COVID-19 and vaccine misinformation
- 03 Overcoming global challenges in vaccination

Taking a multi-pronged approach to combating COVID-19 and vaccine misinformation



Remove false information that has been debunked by public health experts. Reject ads that violate our policies, including those that discourage vaccination.



Reduce the distribution of other misleading claims rated by independent fact-checkers.



Inform people who have come into contact with these claims through notices and labels and connect them with authoritative information from experts.

Community Standards

Under our Community Standards, we remove misinformation when public health authorities conclude that the information is **false** and **likely to contribute to imminent violence or physical harm**. Since COVID-19 was declared a Public Health Emergency of International Concern (PHEIC) in January 2020, we have applied this policy to content containing claims related to COVID-19 that, according to public health authorities, are (a) false, and (b) likely to contribute to imminent physical harm (of imminent physical harm examples include: increasing the likelihood of exposure to or transmission of the virus, or having adverse effects on the public health system's ability to cope with the pandemic). The goal of this policy is to reduce health harm to people, while also allowing people to discuss, debate and share their personal experiences, opinions and news related to the COVID-19 pandemic.

We Remove

Claims about the **existence or severity of COVID-19**. Acknowledging the existence and understanding the severity of COVID-19 is foundational to keeping people safe and aware of the dangers of this public health emergency. We remove claims that deny the existence of the disease or undermine the severity of COVID-19. This includes:

- Claims that COVID-19 is no more dangerous to people than the common flu or cold.

Claims about **COVID-19 transmission and immunity**: Understanding how COVID-19 is transmitted and who can be infected is a critical component of protecting people from getting or spreading the virus. Public health authorities state that COVID-19 can be transmitted in any location and primarily from person to person through small droplets from the nose or mouth, which are expelled when a person with COVID-19 coughs, sneezes or speaks. Public health authorities also agree that all people, regardless of age or other unique characteristics, can be infected with and spread COVID-19. We remove false claims about how and where COVID-19 can be transmitted and who can be infected. This includes:

- Claims that COVID-19 cannot be transmitted in certain climates, weather conditions, or locations

Claims about **guaranteed cures or prevention methods for COVID-19**: Public health authorities, such as the WHO, say there is currently nothing that can guarantee recovery or guarantee the average person will not get COVID-19. We have also heard from public health authorities that if people thought there was a guaranteed cure or prevention for COVID-19, that could lead them to take incorrect safety measures, ignore appropriate health guidance, or even attempt harmful self-medication. This is why we don't allow false claims about how to cure or prevent COVID-19. This includes:

- Claims that for the average person, something can guarantee prevention from getting COVID-19 or can guarantee recovery from COVID-19 before such a cure or prevention has been approved

Claims **discouraging good health practices**: There are a number of good health practices public health authorities advise people take to protect themselves from getting or spreading COVID-19. This includes wearing a face mask, social distancing, getting tested for COVID-19 and, more recently, getting vaccinated against COVID-19. Public health authorities have issued emergency use authorization for several COVID-19 vaccines, so in addition to false claims about face masks, social distancing and testing, we do not allow false claims about the vaccines or vaccination programs which public health experts have advised us could lead to COVID-19 vaccine rejection. This includes false claims about the safety, efficacy, ingredients, development, existence, or conspiracies related to the vaccine or vaccination program. As more information becomes available about COVID-19 vaccines, we will continue to iterate on how we apply this policy. This includes:

- Claims that COVID-19 tests cause cancer

False Claims about Covid Vaccines

- Claims about the availability or existence of COVID-19 vaccines
- Claims about the safety or serious side effects of COVID-19 vaccines
- Claims about the efficacy of COVID-19 vaccines
- Claims about how the COVID-19 vaccine was developed or its ingredients
- Claims involving conspiracy theories about a COVID-19 vaccine or vaccination program

Widely Debunked Vaccine Hoaxes

For the duration of the COVID public health emergency, we remove content that repeats other false health information, primarily about vaccines, that are widely debunked by leading health organizations such as the World Health Organization (WHO) and the Centers for Disease Control and Prevention (CDC). The goal of this policy is to combat misinformation about vaccinations and diseases, which if believed could result in reduced vaccinations and harm public health and safety.

- Vaccines cause autism
- Vaccines cause Sudden Infant Death Syndrome
- Vaccines cause the disease against which they are meant to protect, or cause the person to be more likely to get the disease
- Vaccines or their ingredients are deadly, toxic, poisonous, harmful, or dangerous
- Natural immunity is safer than vaccine acquired immunity
- It is dangerous to get several vaccines in a short period of time, even if that timing is medically recommended
- Vaccines are not effective to prevent the disease against which they purport to protect
- Acquiring measles cannot cause death (requires additional information and/or context)
- Vitamin C is as effective as vaccines in preventing diseases for which vaccines exist.

Repeat Offenders

Pages, Groups, profiles, and Instagram accounts that repeatedly post misinformation or coordinate harm (see Coordinating Harm policies at the top of this entry) related to COVID-19, vaccines, and health may face restrictions, including (but not limited to) reduced distribution, removal from recommendations, or removal from our site.

Since the pandemic began, we've removed more than **16 million pieces of content** on Facebook and Instagram for violating our COVID-19 and vaccine policies.

This includes **more 2 million** pieces of content removed since February alone, when we expanded our COVID and vaccine misinformation policies.

Facebook Content Request System

Government Reporting System



I II III IV V

Introduction to CRS

Facebook Content Request System (CRS)



End-to-end workflow



Government requests

Facebook processes

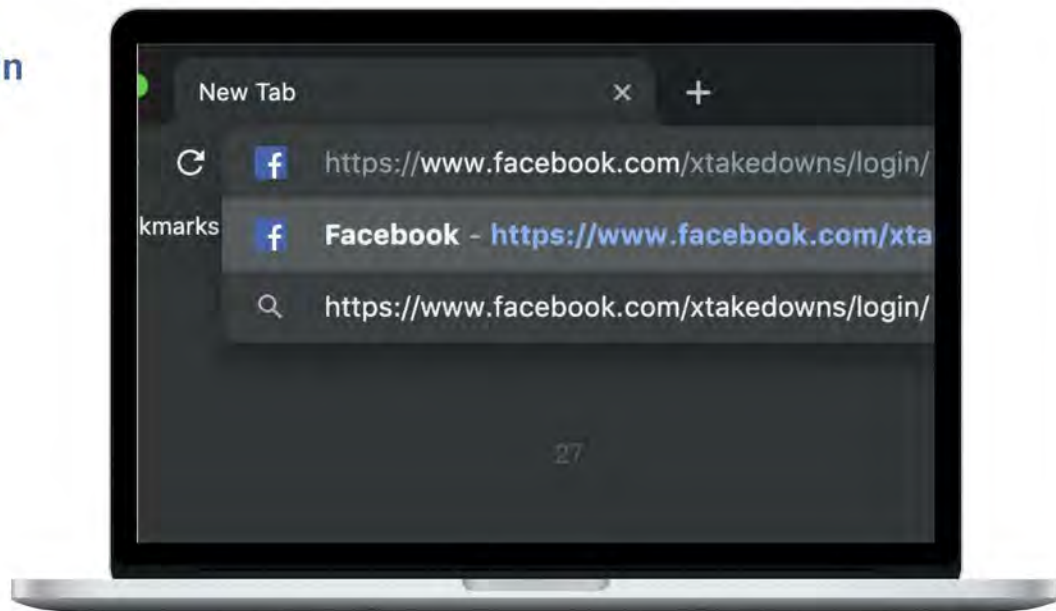
I II III IV V

Demo: govt user experience

1/3 Access to Facebook CRS: security

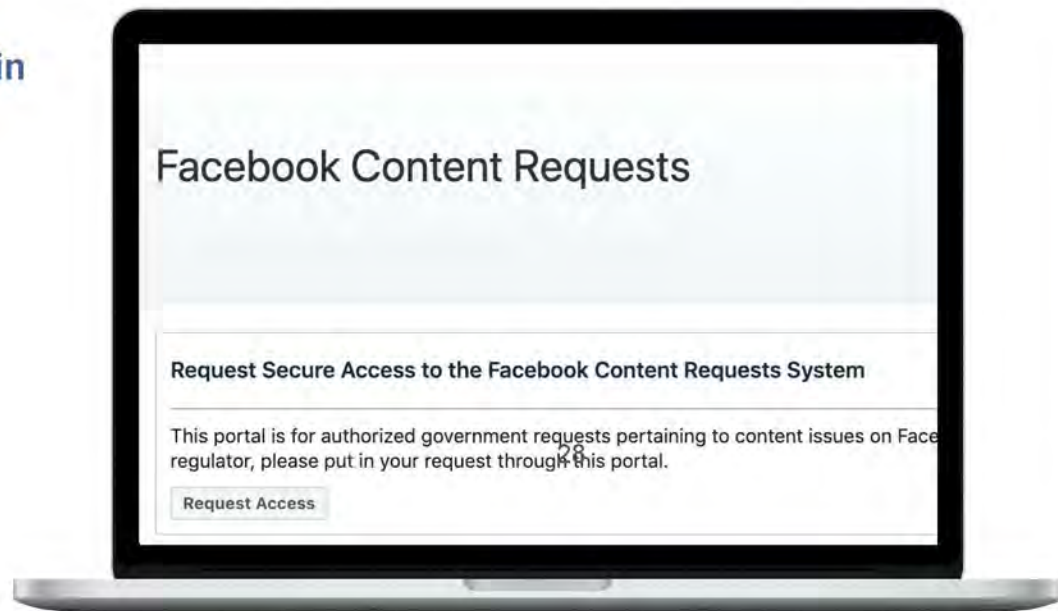
Access to CRS: security

1. Open up your browser and type www.facebook.com/xtakedowns/login



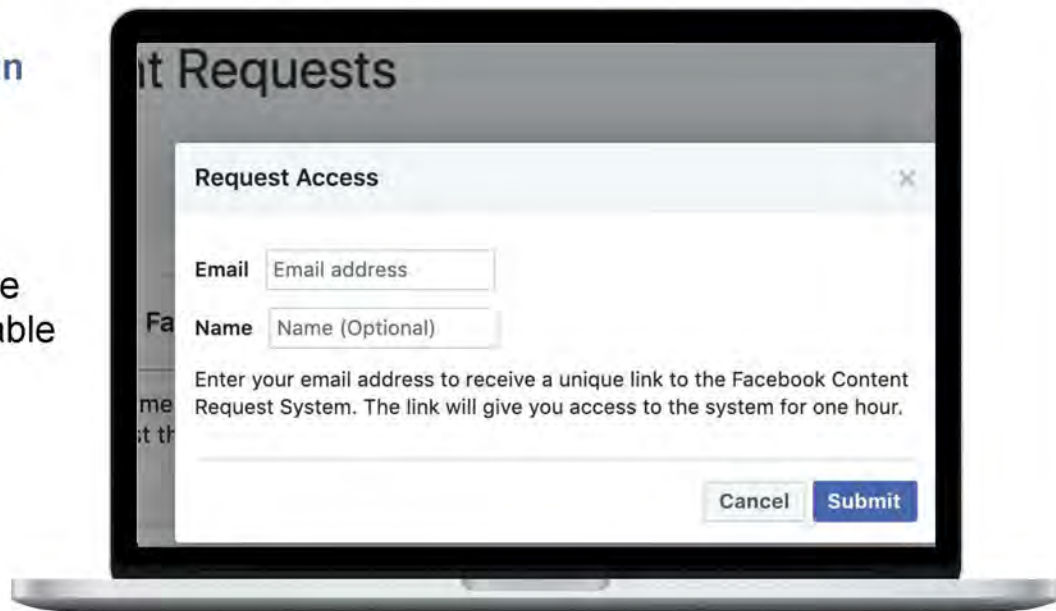
Access to CRS: security

1. Open up your browser and type www.facebook.com/xtakedowns/login
2. Click **Request Access**



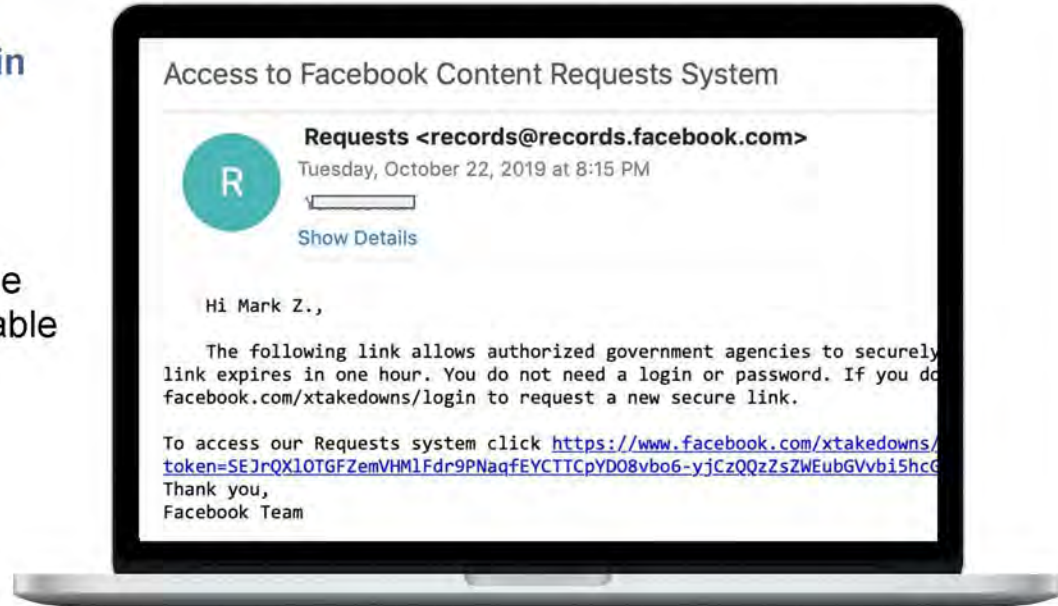
Access to CRS: security

1. Open up your browser and type www.facebook.com/xtakedowns/login
2. Click **Request Access**
3. Input **the email address** that we onboarded with
- 3.a **Name (optional)** will be used for the email that we will send with the disposable link



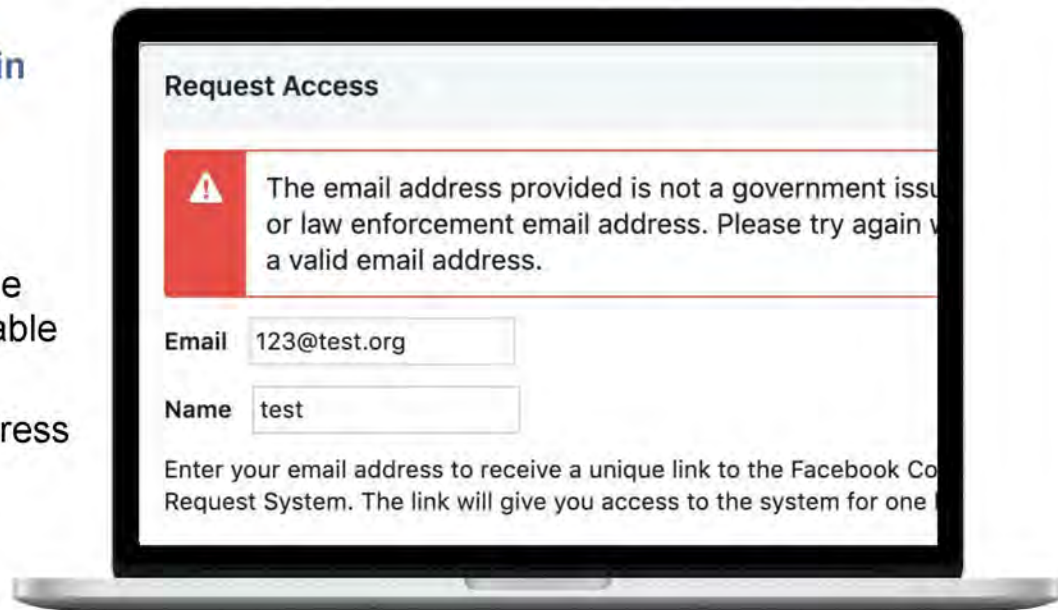
Access to CRS: security

1. Open up your browser and type www.facebook.com/xtakedowns/login
2. Click **Request Access**
3. Input **the email address** that we onboarded with
- 3.a **Name (optional)** will be used for the email that we will send with the disposable link



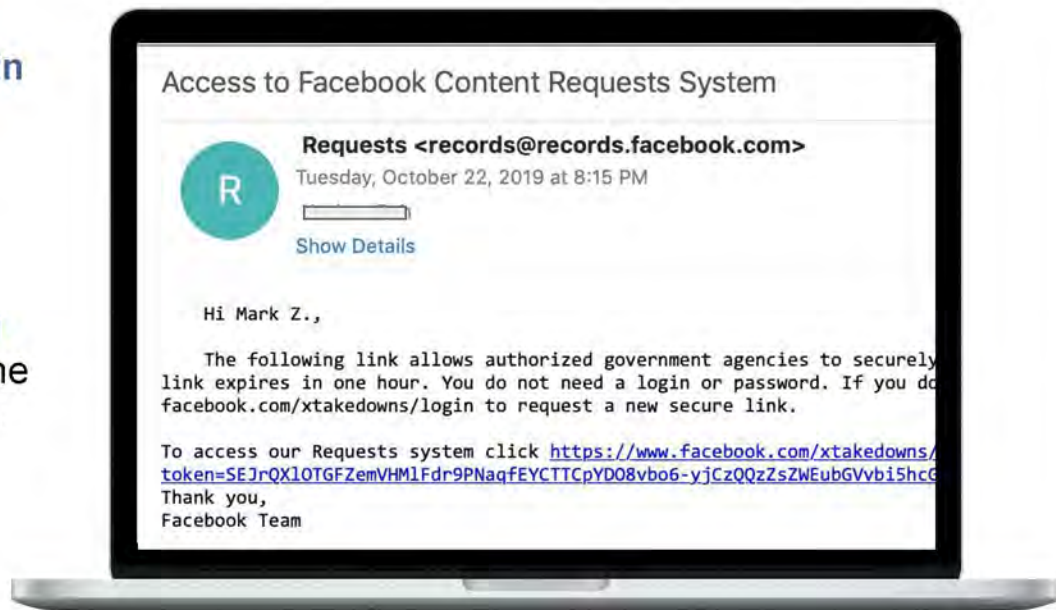
Access to CRS: security

1. Open up your browser and type www.facebook.com/xtakedowns/login
2. Click **Request Access**
3. Input **the email address** that we onboarded with
 - 3.a **Name (optional)** will be used for the email that we will send with the disposable link
 - 3.b Error message: incorrect email address for the onboarded agency



Access to CRS: security

1. Open up your browser and type www.facebook.com/xtakedowns/login
2. Click **Request Access**
3. Input **the email address** that we onboarded with
4. Open an email titled **Access to Facebook Content Requests System** and follow the secure link provided in the email body. Please note that this link is valid only for an hour.



2/3 Report through CRS: Standardization

Report through CRS: standardization

5. Reason for reporting



Facebook Content Requests: CDC

This is a contact form for authorized government agencies. If you person who originally onboarded your agency.

Reason for Reporting:

- Covid Misinformation
- Vaccine Discouragement
- Covid Vaccine Misinformation

Report through CRS: standardization

5. Reason for reporting

Covid & Vaccine Misinformation



Report through CRS: standardization

6. Please submit the relevant violating URLs below (max.20)

A laptop screen displaying a form for submitting violating URLs. The form has a title "Please submit the relevant violating URLs below (max. 20)" and a subtitle "Please add all URL(s), one per line." Below the subtitle is a text input field containing the URL "https://www.facebook.com/".

Please submit the relevant violating URLs below (max. 20)

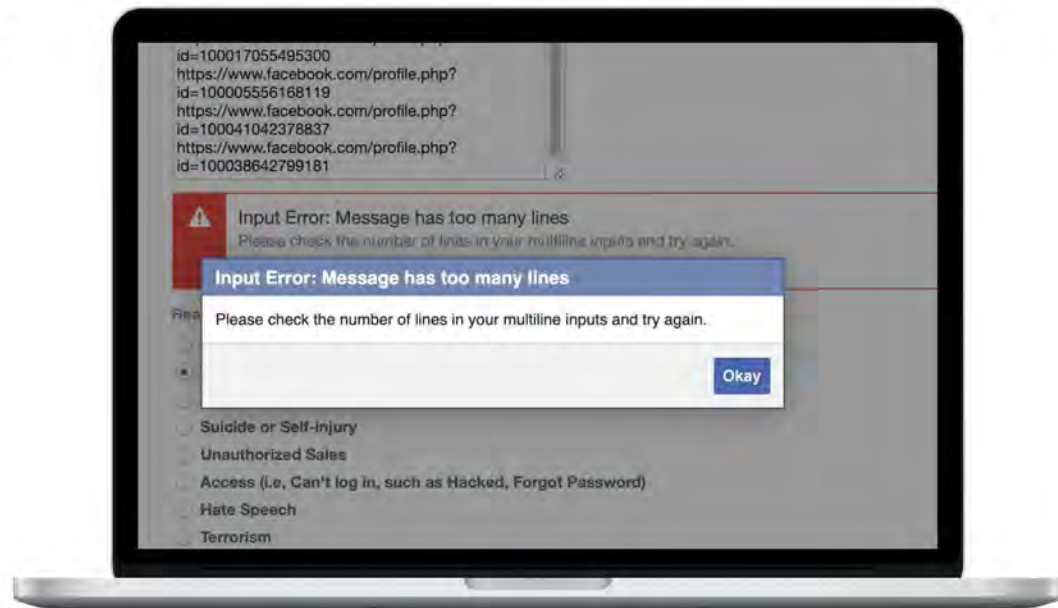
Please add all URL(s), one per line.

https://www.facebook.com/

Report through CRS: standardization

6. Please submit the relevant violating URLs below (max.20)

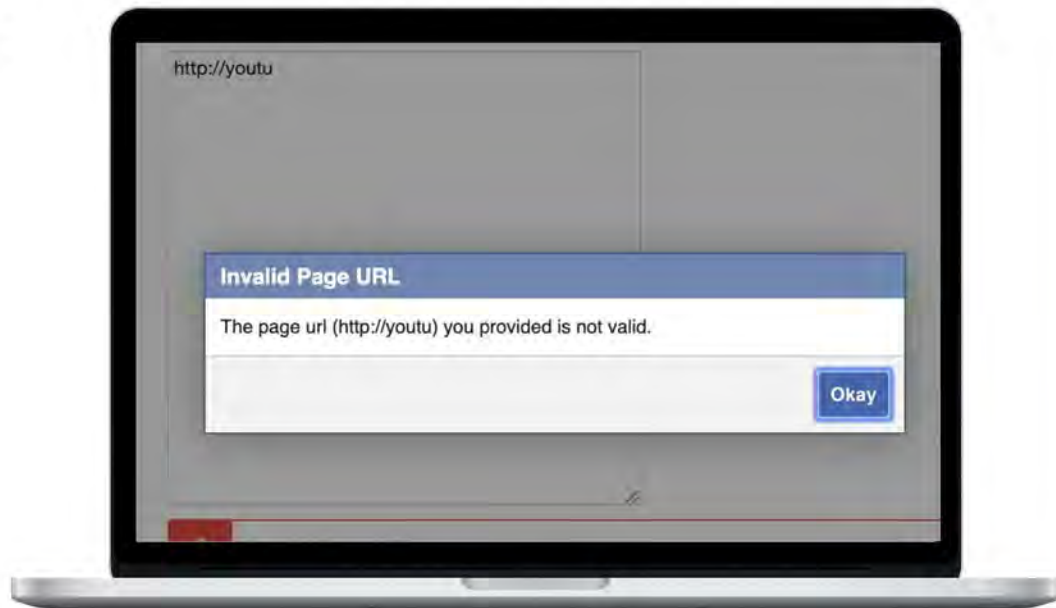
6.a Error Message (over 20 links)



Report through CRS: standardization

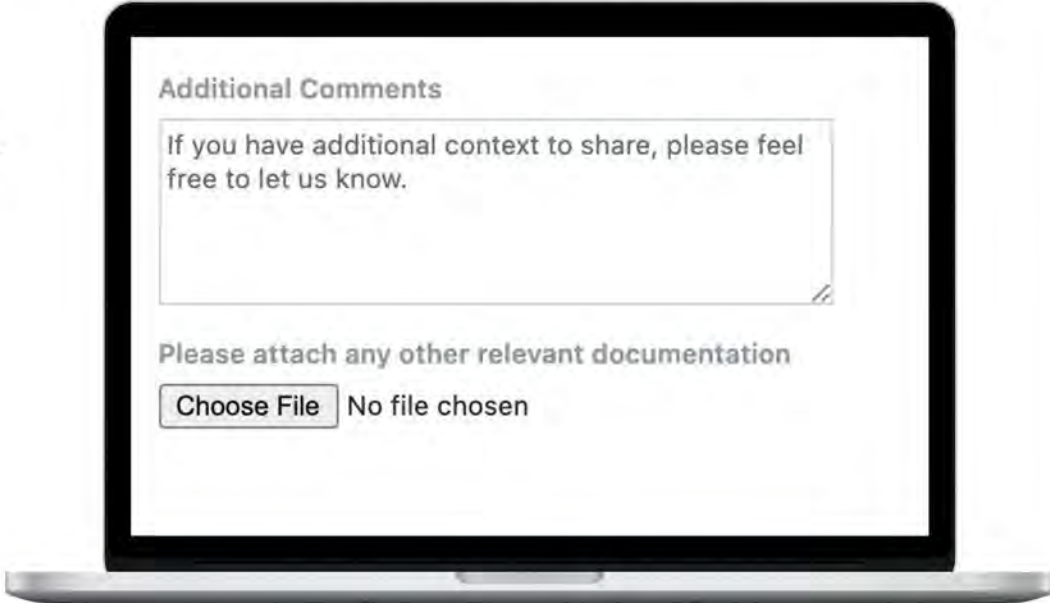
6. Please submit the relevant violating URLs below (max.20)

6.b Error Message (invalid URLs)



Report through CRS: standardization

7. [Optional] Additional Comments
8. [Optional] Please attach any other relevant screenshots or documentation.

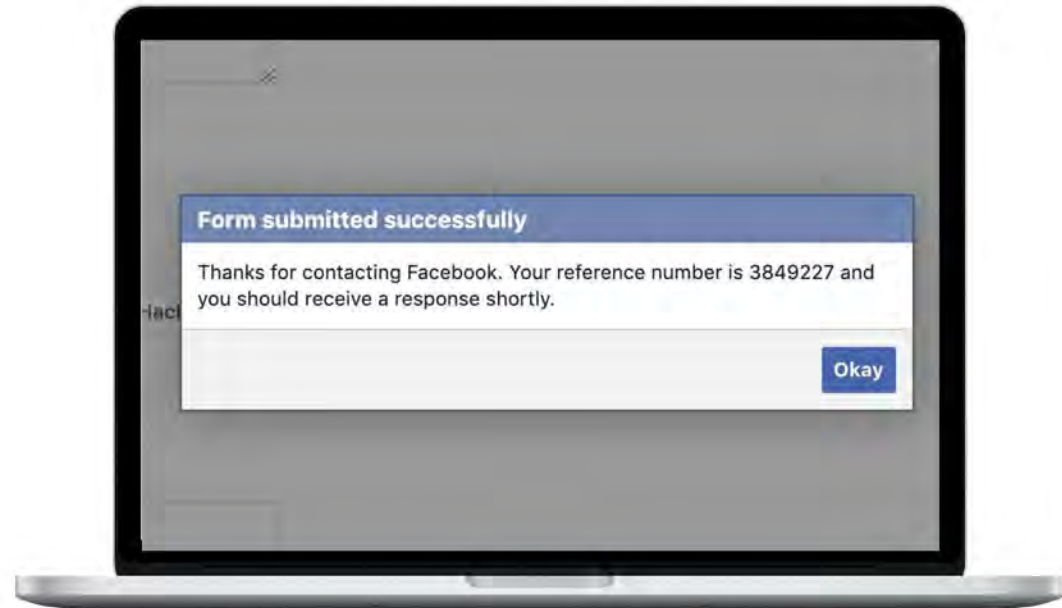


The image shows a laptop screen with a form. The form has a section titled "Additional Comments" with a text area containing the text: "If you have additional context to share, please feel free to let us know." Below this is a section titled "Please attach any other relevant documentation" with a "Choose File" button and the text "No file chosen".

3/3 Final landing page: Transparency

Final landing page: transparency

- 9. Reference number
- 10. Facebook Help Center



Final landing page: transparency

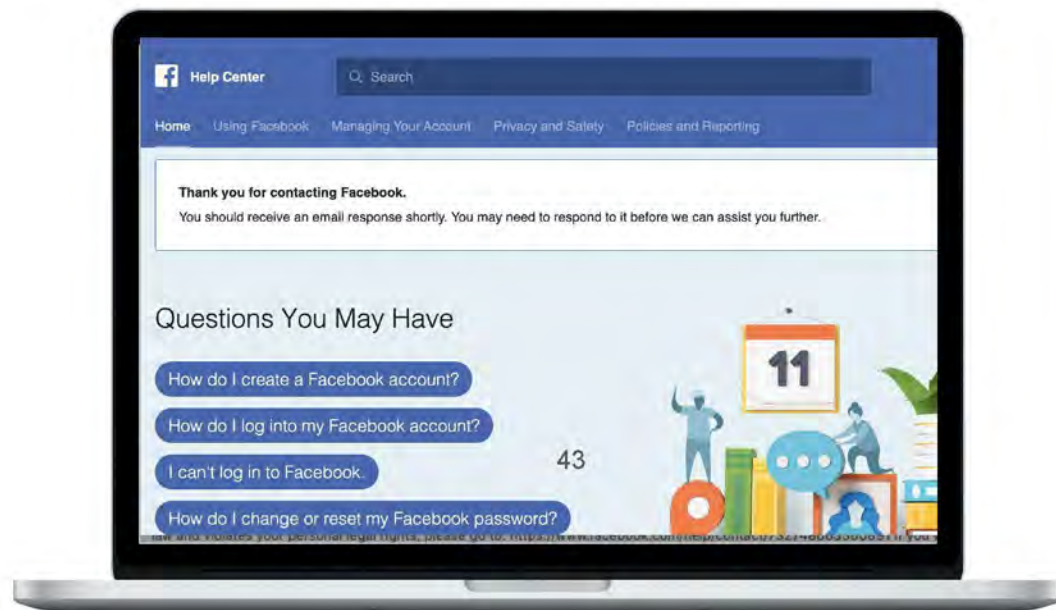
9. Reference number
10. Facebook Help Center



Final landing page: transparency

9. Reference number

10. Facebook Help Center



End-to-end workflow



Government requests

Facebook processes

Thank you

From: [REDACTED]@reingold.com]
Sent: 5/24/2021 2:28:00 PM
To: [REDACTED]@twitter.com
CC: [REDACTED]@cdc.gov]; [REDACTED]@reingold.com]; [REDACTED]
[REDACTED]@cdc.gov]
Subject: RE: COVID Misinformation

Hi [REDACTED],

I hope you had a good weekend. I'm following up about the partner support portal enrollment for CDC. Does the Twitter account need to be connected to a cdc.gov email or is any account fine? Also, would there be any issues or complications stemming from flagging COVID misinformation on the portal using the existing census.gov accounts that have access? We'll want to have at least some CDC accounts whitelisted, but that backup may be helpful in the short-term.

Let us know any next steps we can take to make sure CDC is all set with the portal.

Thanks,

[REDACTED]
Reingold
[REDACTED]

reingold.com

We're on a mission. **Yours.**

From: [REDACTED] (CDC/OD/OADC)
Sent: Tuesday, May 11, 2021 8:50 AM
To: [REDACTED]@twitter.com>
Subject: RE: COVID Misinformation

Does it need to be the CDC account or my personal? If CDC, I'm going to have someone on staff enroll instead of me.

If personal is OK, it is: @ [REDACTED]

From: [REDACTED]@twitter.com>
Sent: Monday, May 10, 2021 8:51 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@reingold.com>; [REDACTED]@reingold.com>; [REDACTED]
[REDACTED]@census.gov>; [REDACTED]@cdc.gov>
Subject: Re: COVID Misinformation

Hi [REDACTED]-

I'd be glad to enroll you in our Partner Support Portal, which allows you a special, expedited reporting flow in the Twitter Help Center. It worked very well with Census colleagues last year.

You need a Twitter account (and to be logged into that account) to access the Partner Support Portal. What account (or accounts) would you like me to enroll?

Best,

On Mon, May 10, 2021 at 5:05 PM [REDACTED]@cdc.gov> wrote:

[REDACTED] - I don't think we have info on how to enroll but we'd be happy to get on if you can send some info.

Thanks.

From: [REDACTED]@twitter.com>

Sent: Monday, May 10, 2021 3:02 PM

To: [REDACTED]@cdc.gov>

Cc: [REDACTED]@reingold.com>; [REDACTED]@reingold.com> [REDACTED]

[REDACTED]@census.gov>; [REDACTED]@cdc.gov>

Subject: Re: COVID Misinformation

H [REDACTED] -

Thanks for sharing this - agree these are important trends to note; a quick scan shows that at least some of these have been previously reviewed and actioned. I will now ask the team to review the others.

[REDACTED] remind me: did you have a chance to enroll in our Partner Support Portal? In the future, that's the best way to get a spreadsheet like this reviewed.

Best.

On Mon, May 10, 2021 at 1:50 PM [REDACTED]@cdc.gov> wrote:

[REDACTED] -

We wanted to point out two issues that we are seeing a great deal of misinfo about - vaccine shedding and microchips. The below are just some example posts. We do plan to post something shortly to address vaccine shedding and I can send that link soon. Our census team copied here, has much more info on it if needed.

Also, we are standing up a BOLO COVID misinformation meeting and inviting all tech platforms. We are shooting for 12pm EST on Friday for our first meeting. I'll include you on the invite but if you'd like to propose an alternative approach or would like to me include others, just let me know.

Thanks!

Post Text	Link
<p>MAGNET STICKS TO AREA INJECTED BY THE VACCINE- ARE THE VACCINATED GETTING MICROCHIPPED? #justsayno</p>	<p>https://t</p>
<p>The ex VP of Pfizer came out predicting that there will be a human depopulation of the vaccinated people in 2 years. An even shorter lifespan after the booster. He believes it's eugenics. Many scientists are corroborating this.</p> <p>I'll be alive!</p> <p>Experimental vaccines!</p>	<p>https://t</p>
<p>THE BIG QUESTION IS WHY ARE THEY LYING...GOVERNMENTS SIGNED US AWAY TO NWO..DEPOPULATION..ALSO EXPERIMENTS IN AI..IN LAYMENS TERMS..TRYING TO TURN US INTO ROBOTS/ ANDROIDS....ALSO THEY WANT WORLD BANK OF OUR DNA .. VIA VAX</p>	<p>https://t</p>
<p>Agreed. But if the science is being followed, there's an awful lot of evidence that the vax crowd are shedding...maybe the non-vaxxed are safer this way...thoughts</p> <p>@crislerwyo</p> <p>?</p>	<p>https://t</p>
<p>COVID 'Vaccine Shedding', Evidence SARS-CoV-2 Spike Protein Can 'Alter Human Genes' & VAERSTruth</p>	<p>https://t</p>
<p>Thank Bill Gates for wanting depopulation. That's exactly what this vaccine is doing, and will continue to do over the next few years.</p>	<p>https://t</p>
<p>IM ALARMED BY THE AMOUNT OF WOMEN IN MY DM'S COMPLAINING ABOUT ABNORMAL BLEEDING AND MISCARRIAGES AFTER COMING IN CONTACT WITH SOMEONE WHOSE BEEN VACCINATED!!!!</p>	<p>https://t</p>
<p>Well hundreds of women on this page say they are having bleeding/ clotting after vaccination or that they bleed oddly being AROUND vaccinated women. Unconfirmed, needs more investigation. But lots of reports. COVID-19 Vaccine Side Effects</p>	<p>https://t</p>
<p>[Links to: https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/]</p>	<p>https://t</p>
<p>So the #CDC now says that those who are "Fully Vaxx nated" can "Go outside & live freely" lol.. This is a joke</p> <p>Quick questions for those who were experimented on I MEAN -Took the shot, what were the ingredients in it? You did ASK right? .. Also, do you know what SHEDDING is?</p>	<p>https://t</p>
<p>Here is the official Pfizer trail protocols Concerning shedding by the vaccinated Fertility (male and female) contraception to be compulsorily used because shedding Adverse events and serious adverse events reporting And much more Dangers ore known</p>	<p>https://t</p>

https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf	
<p>For those of you who have questions about Spiked Protein SHEDDING: Pfizer admits in its own mRNA vaxx trial documentation that non-vaxxed people can be ENVIRONMENTALLY EXPOSED to the shot's spike proteins by INHALATION or SKIN CONTACT.</p> <p>https://themostrbeautifulworld.com/blog/skin-contact-covid</p>	https://t
<p>Pfizer acknowledges the existence of "SHEDDING" in their #mRNA vaccines, and is setting up this new trial to study these dangers.</p> <p>(Shedding is where unvaccinated people experience serious health issues just by being near to vaccinated people).</p> <p>https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf#page67</p>	https://t



CAUTION: This message originated externally. Please use caution when clicking on links or opening attachments.

From: [REDACTED]@fb.com]
Sent: 5/20/2021 12:50:01 PM
To: [REDACTED]@cdc.gov]
CC: [REDACTED]@fb.com]
Subject: Re: Add a name: RE: CV19 misinfo reporting channel
Attachments: CDC-Onboarding-Deck.pdf; CDC_-How-to-report-through-Facebook-Government-Casework-Channel-1.pdf

Trying the PDF again – looks like it didn't attach.

From: [REDACTED]@fb.com>
Date: Thursday, May 20, 2021 at 12:49 PM
To: [REDACTED]@cdc.gov>
Cc: [REDACTED]@fb.com>
Subject: Re: Add a name: RE: CV19 misinfo reporting channel

Hi [REDACTED]

Attached is a PDF of our onboarding slides should you need to review as well as a how to guid.

In speaking with our technical teams, we think it's best for both Census and CDC to have an email alias / shared inbox that staff have access to for reporting – so that Census can have appropriate access to Covid portal as well.

If you have any questions about that, please do let us know!

From: [REDACTED]@cdc.gov>
Date: Wednesday, May 19, 2021 at 12:38 PM
To: [REDACTED]@fb.com>
Subject: Add a name: RE: CV19 misinfo reporting channel

Please add [REDACTED] to system access. [REDACTED]@cdc.gov.

From: [REDACTED]@fb.com>
Sent: Wednesday, May 12, 2021 11:21 AM
To: [REDACTED]@cdc.gov>; [REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Sure can.

[REDACTED]@cdc.gov>
Date: Wednesday, May 12, 2021 at 11:19 AM
To: [REDACTED]@fb.com>, [REDACTED]@fb.com>
Cc: [REDACTED]@fb.com>
Subject: RE: CV19 misinfo reporting channel

Ok, I'll send the appt and get a zoom. Then you can add on your folks.

From: [redacted]@fb.com>
Sent: Wednesday, May 12, 2021 11:06 AM
To: [redacted]@cdc.gov> [redacted]@fb.com>
Cc: [redacted]@com>
Subject: Re: CV19 misinfo reporting channel

Apologies for the bumpy transition with [redacted] out – do you all have a zoomgov requirement? And if so, would you hold the calendar invite for this? Or does Census?

From: [redacted]@fb.com>
Date: Wednesday, May 12, 2021 at 10:51 AM
To: [redacted]@cdc.gov>, [redacted]@fb.com>
Cc: [redacted]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Great! Thank you!

From: [redacted]@cdc.gov>
Date: Wednesday, May 12, 2021 at 10:50 AM
To: [redacted]@fb.com>, [redacted]@fb.com>
Cc: [redacted]@fb.com>
Subject: RE: CV19 misinfo reporting channel

Sorry, didn't realize you were awaiting a respond to your explanation. That time still works. Thanks!

But re-looking at this list, please only include these people as we've had change over since we started the chain:

- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]

From: [redacted]@com>
Sent: Wednesday, May 12, 2021 10:19 AM
To: [redacted]@cdc.gov> [redacted]@fb.com>
Cc: [redacted]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Bumping this calendar thread

From: [redacted]@fb.com>
Date: Monday, May 10, 2021 at 4:51 PM
To: [redacted]@cdc.gov>, [redacted]@fb.com>
Cc: [redacted]@fb.com>
Subject: Re: CV19 misinfo reporting channel

This would be for onboarding your teams to the misinfo casework / reporting channel

From: [REDACTED] <[REDACTED]@cdc.gov>
Date: Monday, May 10, 2021 at 4:04 PM
To: [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>
Cc: G [REDACTED] <[REDACTED]@fb.com>
Subject: RE: CV19 misinfo reporting channel

Time is good. I did ask [REDACTED] this embarrassing question. I had it in my head this was for Crowd Tangle. But on Thursday she explained it is for something else. Well, I didn't write it down and I'm honestly not sure what this is for. Sorry!

From: [REDACTED] <[REDACTED]@fb.com>
Sent: Monday, May 10, 2021 4:01 PM
To: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@cdc.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Thanks, [REDACTED]
So nice to meet you, [REDACTED]

Look likes Wednesday the 19th 12-1pm option works best for our folks.
Does that option still work for your side?

From: [REDACTED] <[REDACTED]@fb.com>
Date: Monday, May 10, 2021 at 3:28 PM
To: [REDACTED] <[REDACTED]@cdc.gov>, [REDACTED] <[REDACTED]@fb.com>
Cc: [REDACTED] <[REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Hi [REDACTED]

[REDACTED] just went on maternity leave. We are very excited for her and her new addition!
As such, we didn't want you to be a surprised that [REDACTED] will pick up on the threads where [REDACTED] was leading starting today.

That will include this one with scheduling training for the government case work project.

Best,

From: [REDACTED] <[REDACTED]@cdc.gov>
Date: Monday, May 10, 2021 at 12:25 PM
To: [REDACTED] <[REDACTED]@fb.com>
Cc: P [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>
Subject: RE: CV19 misinfo reporting channel

I'm so sorry – I'm out all day May 17 for a medical thing, can we pick another one? My fault!

From: [REDACTED] <[REDACTED]@fb.com>
Sent: Friday, May 7, 2021 11:27 AM
To: [REDACTED] <[REDACTED]@cdc.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Hi [REDACTED] – Following up from our meeting yesterday. It looks like Monday, May 17th at 12:00pm will work for onboarding meeting. The overlaps with your standing Census meeting you mentioned. We will plan to invite the email addresses below (those being onboarded).

Please let me know if any flags on your end.

Best,

[REDACTED]



Genelle Quarles Adrien
Politics & Government Outreach
e: genelleadrien@fb.com | w: [facebook.com/gpa](https://www.facebook.com/gpa)

From: [REDACTED] <[REDACTED]@cdc.gov>
Date: Tuesday, April 27, 2021 at 11:21 AM
To: [REDACTED] <[REDACTED]@fb.com>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: RE: CV19 misinfo reporting channel

Ugh, so sorry I missed this. It looks correct but I think so might have access already, but not sure.

From: [REDACTED] <[REDACTED]@fb.com>
Sent: Tuesday, April 27, 2021 11:05 AM
To: [REDACTED] <[REDACTED]@cdc.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: Re: CV19 misinfo reporting channel

Hi [REDACTED] – Hope the week is off to a good start. I wanted to bump this and see if you had any edits/additions to the onboarding list below.

Let us know if you have any questions.

Best,

[REDACTED]

From: [REDACTED] <[REDACTED]@fb.com>
Date: Tuesday, April 13, 2021 at 3:50 PM
To: [REDACTED] <[REDACTED]@cdc.gov>
Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>
Subject: CV19 misinfo reporting channel

Hi [REDACTED] - Hope the week is off to a good start. We're working to get our COVID-19 misinfo channel up for CDC and Census colleagues. Could you kindly confirm if the below emails are correct for onboarding to the reporting channel and if there are others you'd like to include?

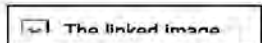
Please let me know if you have any questions.

Thank you!

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

GOV



[REDACTED]

From: [redacted]@twitter.com]
Sent: 5/11/2021 9:27:53 AM
To: [redacted]@cdc.gov]
Subject: Re: COVID Misinformation

Your account works fine. I'll proceed with processing your enrollment.

On Tue, May 11, 2021 at 8:50 AM [redacted]@cdc.gov> wrote:

Does it need to be the CDC account or my personal? If CDC, I'm going to have someone on staff enroll instead of me.

If personal is OK, it is: [redacted]

From: [redacted]@twitter.com>

Sent: Monday, May 10, 2021 8:51 PM

To: [redacted]@cdc.gov>

Cc: [redacted]@reingold.com>; [redacted]@cdc.gov>

[redacted]@census.gov>; [redacted] (C)

[redacted]@cdc.gov>

Subject: Re: COVID Misinformation

Hi [redacted]

I'd be glad to enroll you in our Partner Support Portal, which allows you a special, expedited reporting flow in the Twitter Help Center. It worked very well with Census colleagues last year.

You need a Twitter account (and to be logged into that account) to access the Partner Support Portal. What account (or accounts) would you like me to enroll?

Best,

[redacted]

On Mon, May 10, 2021 at 5:05 PM [redacted]@cdc.gov> wrote:

[redacted] - I don't think we have info on how to enroll but we'd be happy to get on if you can send some info.

Thanks.

From: [redacted]@twitter.com>

Sent: Monday, May 10, 2021 3:02 PM

To: [redacted]@cdc.gov>

Cc: [redacted]@reingold.com>; [redacted]@reingold.com>; [redacted]

[redacted]@census.gov>; [redacted]

[REDACTED]@cdc.gov>

Subject: Re: COVID Misinformation

Hi [REDACTED]

Thanks for sharing this - agree these are important trends to note; a quick scan shows that at least some of these have been previously reviewed and actioned. I will now ask the team to review the others.

[REDACTED] remind me: did you have a chance to enroll in our Partner Support Portal? In the future, that's the best way to get a spreadsheet like this reviewed.

Best.

On Mon, May 10, 2021 at 1:50 PM [REDACTED]@cdc.gov> wrote:

We wanted to point out two issues that we are seeing a great deal of misinfo about – vaccine shedding and microchips. The below are just some example posts. We do plan to post something shortly to address vaccine shedding and I can send that link soon. Our census team copied here, has much more info on it if needed.

Also, we are standing up a BOLO COVID misinformation meeting and inviting all tech platforms. We are shooting for 12pm EST on Friday for our first meeting. I'll include you on the invite but if you'd like to propose an alternative approach or would like to me include others, just let me know.

Thanks!

Post Text

MAGNET STICKS TO AREA INJECTED BY THE VACCINE- ARE THE VACCINATED GETTING MICROCHIPPED? #justsayno

The ex VP of Pfizer came out predicting that there will be a human depopulation of the vaccinated people in 2 years. An even shorter lifespan after the booster. He believes it's eugenics. Many scientists are corroborating this.

I'll be alive!

⊙Experimental vaccines!

THE BIG QUESTION IS WHY ARE THEY LYING...GOVERNMENTS SIGNED US AWAY TO NWO..DEPOPULATION..ALSO EXPERIMENTS IN AL.IN LAYMENS TERMS..TRYING TO TURN US INTO ROBOTS/ ANDROIDS....ALSO THEY WANT WORLD BANK OF OUR DNA .. VIA VAX

Agreed. But if the science is being followed, there's an awful lot of evidence that the vax crowd are shedding...maybe the non-vaxxed are safer this way...thoughts

@crislerwyo

?

COVID 'Vaccine Shedding', Evidence SARS-CoV-2 Spike Protein Can 'Alter Human Genes' & VAERS Truth

Thank Bill Gates for wanting depopulation. That's exactly what this vaccine is doing, and will continue to do over the next few years.

IM ALARMED BY THE AMOUNT OF WOMEN IN MY DM'S COMPLAINING ABOUT ABNORMAL BLEEDING AND MISCARRIAGES AFTER COMING IN CONTACT WITH SOMEONE WHOSE BEEN VACCINATED!!!!

Well hundreds of women on this page say they are having bleeding/ clotting after vaccination or that they bleed oddly being AROUND vaccinated women. Unconfirmed, needs more investigation. But lots of reports. COVID-19 Vaccine Side Effects

[Links to: <https://www.infowars.com/posts/vaccine-shedding-causing-miscarriages-and-blood-clots-in-unvaccinated-females/>]

So the #CDC now says that those who are "Fully Vaxxed" can "Go outside & live freely" lol.. This is a joke .

Quick questions for those who were experimented on I MEAN-Took the shot, what were the ingredients in it? You did ASK right? .. Also, do you know what SHEDDING is?

Here is the official Pfizer trial protocols
Concerning shedding by the vaccinated
Fertility (male and female)
contraception to be compulsorily used because shedding
Adverse events and serious adverse events reporting
And much more
Dangers ore known

https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf

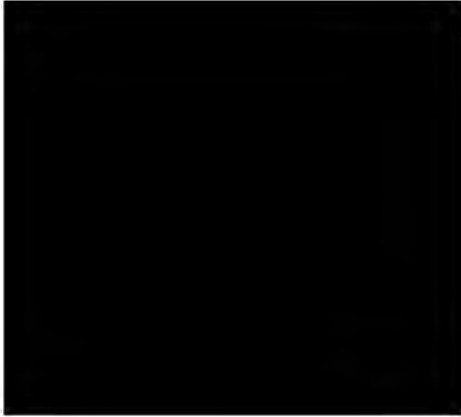
For those of you who have questions about Spiked Protein SHEDDING: Pfizer admits in its own mRNA vaxx trial documentation that non-vaxxed people can be ENVIRONMENTALLY EXPOSED to the shot's spike proteins by INHALATION or SKIN CONTACT.

<https://themostbeautifulworld.com/blog/skin-contact-covid>

Pfizer acknowledges the existence of "SHEDDING" in their mRNA vaccines, and is setting up this new trial to study these dangers.

(Shedding is where unvaccinated people experience serious health issues just by being near to vaccinated people).

https://media.tghn.org/medialibrary/2020/11/C4591001_Clinical_Protocol_Nov2020_Pfizer_BioNTech.pdf#page67



From: [REDACTED] (CDC/OD/OADC) [REDACTED]
[REDACTED]
Sent: 3/31/2021 2:23:11 PM
To: [REDACTED]@fb.com]
Subject: RE: This week's meeting

Got it, thanks.

From: [REDACTED]@fb.com>
Sent: Wednesday, March 31, 2021 2:18 PM
To: [REDACTED]@cdc.gov>
Subject: Re: This week's meeting

Hi [REDACTED]

We are working on a proposal of how set up sharing partnership on the misinform items...what it would look like.... so we can discuss Thursday.

Lots of team members out the last two weeks due to all the holidays, but that is the plan so we can discuss on the Thursday call.

From: [REDACTED]@cdc.gov>
Date: Wednesday, March 31, 2021 at 2:07 PM
To: [REDACTED]@fb.com>
Subject: RE: This week's meeting

Can you explain what you originally meant when you said this "will know in a few hours (I am told if we have a plan to present for Census Thursday or if it needs more work)". I'm still a bit confused.

But here is what Census mentioned that they would like to discuss:

- It looks like the posts from last week's deck about infertility and side effects have all been removed. Were those re-evaluated by the moderation team or taken down for another reason?
- One of the main themes we're seeing and from the CrowdTangle report is local news coverage of deaths after receiving the vaccine. What's the approach for adding labels to those stories?
 - [Example: No label](#)
 - [Example: Label that links to WHO](#)
- Can we add the Census team to CrowdTangle?
- How should we best engage regularly going forward on the Census/CDC reports.

Thanks.

From: [REDACTED]@fb.com>
Sent: Tuesday, March 30, 2021 7:46 PM
To: [REDACTED]@cdc.gov>
Subject: Re: This week's meeting

Hi [REDACTED]

Yes, I think good to have questions from Census so we make sure we have the right person.

I can ask [REDACTED] to join again so she can be asked questions/provide more information about influencers and I have noted your question about removals and will tee that up as well.

What you have below is a pretty full agenda so I will start to shape it based on what you have below.

From: [REDACTED] [cdc.gov](mailto:[REDACTED]@cdc.gov)>
Date: Tuesday, March 30, 2021 at 7:38 PM
To: [REDACTED] [fb.com](mailto:[REDACTED]@fb.com)>
Subject: RE: This week's meeting

The CDC team mentioned to me that they would like to have more info from [REDACTED] about what is being done on the amplification-side and gain a better understanding how FB is working with influencers. The team is still interested in more info on how you analyze the data on removals, etc. I didn't ask Census if they had questions...but I know they were hoping to go over the deck they had and discuss how to engage on a more regular basis. I'm not sure what you all are preparing for them? (that might have slipped my mind from last week, sorry if so).

Thanks!

From: [REDACTED] [fb.com](mailto:[REDACTED]@fb.com)>
Sent: Tuesday, March 30, 2021 3:16 PM
To: [REDACTED] [cdc.gov](mailto:[REDACTED]@cdc.gov)>
Subject: Re: This week's meeting

Hi [REDACTED]

Yes, I did see and will know in a few hours (I am told if we have a plan to present for Census Thursday or if it needs more work) and it would be great to have questions that may not have been answered from your team on misinfo. That team is very busy so it's a good opportunity to did deeper on that topic and especially if there are areas that are still unclear or the teams have concerns about.

I will stand by.

Best,
[REDACTED]

From: [REDACTED] [cdc.gov](mailto:[REDACTED]@cdc.gov)>
Date: Tuesday, March 30, 2021 at 3:08 PM
To: [REDACTED] [fb.com](mailto:[REDACTED]@fb.com)>
Subject: RE: This week's meeting

Hope all is well too. I plan to join and listen in to the 3:30 meeting, FYI.

I added this part in yellow to our chain on turn.io so you probably missed it, did you have thoughts on how we can regularly meet with Census? I will also check back with others to see if they have other Qs that that were unanswered and get back to you.

So in follow up to today's meeting -- besides discussing things in more depth next Thur, am I correct that your team is going to consider how you might want to engage with the CDC/Census team routinely and get back to us? I'd be fine with using our existing time for this regular discussion if that end up working out best. I don't quite have a good vision yet on how it will work but I know you all have experience with Census already.

From: [REDACTED]@fb.com>
Sent: Tuesday, March 30, 2021 2:42 PM
To: [REDACTED]@cdc.gov>
Subject: This week's meeting

Hi [REDACTED]

Hope all is well...as it can be. At least Spring is making an appearance.

I wanted to surface any misinfo questions your team may have for the team that I had briefing last time. They are available to attend again, but also want to make sure we are answering any of your team's questions.

Best,

[REDACTED]
FACEBOOK

From: [REDACTED]@google.com]
Sent: 9/29/2021 12:56:30 PM
To: [REDACTED]@hhs.gov]; [REDACTED]@gmail.com
CC: [REDACTED]@google.com]
Subject: YouTube Vaccine Policy Announcement

Good Afternoon -

I'm writing to share an update we recently made to YouTube's policies pertaining to vaccine-related misinformation.

Today we have a [COVID-19 Vaccine misinfo](#) policy which allows us to remove a limited list of verified false claims about COVID-19 vaccines.

We just announced that we will be introducing a new policy that prohibits content that includes harmful misinformation about the safety, efficacy, or ingredients for currently administered vaccines that are approved and confirmed to be safe and effective by local health authorities and by the World Health Organization (WHO).

You can learn more about the announcement we made [here](#) and a detailed overview of our policy in our help center [here](#).

Please let me know if you have any questions.

Best Regards,

[REDACTED]

--

[REDACTED]

[YouTube |](#) [REDACTED]

From: [REDACTED]@fb.com]
Sent: 5/4/2022 3:48:11 PM
To: [REDACTED]@cisa.dhs.gov]
CC: [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@fb.com]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@fb.com] [REDACTED]
Subject: Re: Account Security

Hello Team CISA!

Hope you are all well.

In our conversation a few weeks ago, you mentioned that your team could potentially help connect us with local election offices. Is this something you are still able to help with? Additionally, we can provide a training for them on account security best practices if you think that could be helpful.

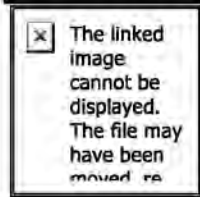
And as always, if there is anything we can do to be helpful in the meantime, please let us know!

Thanks,
[REDACTED]

From: [REDACTED]@cisa.dhs.gov>
Date: Wednesday, April 27, 2022 at 12:37 PM
To: [REDACTED]@fb.com> [REDACTED]@fb.com>
Cc: [REDACTED]@cisa.dhs.gov>, [REDACTED]@cisa.dhs.gov> [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]@cisa.dhs.gov>, [REDACTED]@cisa.dhs.gov>, [REDACTED]@cisa.dhs.gov>
Subject: Re: Account Security

Perfect thank you so much!

[REDACTED]



From: [REDACTED]@fb.com>
Sent: Wednesday, April 27, 2022 11:15:25 AM
To: [REDACTED]@cisa.dhs.gov> [REDACTED]@fb.com>

Cc: [redacted]@cisa.dhs.gov> [redacted]@cisa.dhs.gov>;
[redacted]@fb.com> [redacted]@fb.com>;
[redacted]@fb.com> [redacted]@fb.com>; [redacted]@cisa.dhs.gov>; [redacted]
[redacted]@cisa.dhs.gov>; [redacted]@cisa.dhs.gov>

Subject: Re: Account Security

Got it – and no problem! I had our team design my email directly into the document (new version attached here) so everything is all in one place for you.

Best,

 Meta

From: [redacted]@cisa.dhs.gov>
Date: Wednesday, April 20, 2022 at 12:45 PM
To: [redacted]@fb.com>, [redacted]@fb.com>
Cc: [redacted]@cisa.dhs.gov>, [redacted]
<[redacted]@cisa.dhs.gov>, [redacted]@fb.com>, [redacted]
[redacted]@fb.com>, [redacted]@fb.com>, [redacted]@fb.com>, [redacted]
[redacted]@cisa.dhs.gov>, [redacted]@cisa.dhs.gov>, [redacted]
[redacted]@cisa.dhs.gov>

Subject: RE: Account Security

Hi [redacted] That could work, though we'd also welcome that as part of the document. Given we have a broader team that does trainings etc, it might be helpful for that info to be included in the doc. Though I understand there may be concerns with this approach.

Will take your steer, let me know what you think.

[redacted]



From: [redacted]@fb.com>
Sent: Monday, April 18, 2022 5:30 PM
To: [redacted]@fb.com>, [redacted]@cisa.dhs.gov>
Cc: [redacted]@cisa.dhs.gov>, [redacted]@cisa.dhs.gov>;
[redacted]@fb.com>, [redacted]@fb.com>; [redacted]
[redacted]@fb.com>, [redacted]@fb.com>, [redacted]@cisa.dhs.gov>

[redacted]@cisa.dhs.gov>; [redacted]@cisa.dhs.gov>

Subject: Re: Account Security

Thanks [redacted]

Would it work to just provide my email when you share out this one pager, and let them know if they need anything (like a page verification) or have any content they want to escalate for review, they can reach out to me and I can get them to the right person to help?

Best,

 Meta

[redacted]

From: [redacted]@fb.com>

Date: Monday, April 18, 2022 at 11:50 AM

To: [redacted]@cisa.dhs.gov>

Cc: [redacted]@cisa.dhs.gov>, [redacted]
[redacted]@cisa.dhs.gov>, [redacted]@fb.com>, [redacted]
<[redacted]@fb.com>, [redacted]@fb.com>, [redacted]@fb.com>, [redacted]
[redacted]@fb.com>, [redacted]@cisa.dhs.gov>, [redacted]@cisa.dhs.gov>, [redacted]@cisa.dhs.gov>

Subject: Re: Account Security

Great! Many thank [redacted] for the quick reply & feedback.

[redacted]—who is cc'd on our team will loop in others from her team

Happy to move some of your colleagues to BCC as needed/defer to you to do that as [redacted] and her team work out the details.

Sent from my iPhone.

On Apr 18, 2022, at 10:54 AM [redacted]@cisa.dhs.gov> wrote:

Thanks so much for sending [redacted]!

This looks great – the only thing I'd recommend adding is any steps for flagging or escalating MDM content, if possible. I think then that would make this a comprehensive product on both of the critical needs for officials – account security and MDM concerns. We discussed this a bit in our in-person meeting two weeks ago. Let me know if that's doable.

Thank you!

[redacted]



From: [redacted]@fb.com>
Sent: Friday, April 15, 2022 9:01 AM
To: [redacted]@cisa.dhs.gov> [redacted]@cisa.dhs.gov>; [redacted]
[redacted]@cisa.dhs.gov>
Cc: [redacted]@fb.com>; [redacted]@fb.com>; [redacted]
[redacted]@fb.com>; [redacted]@fb.com>; [redacted]@fb.com>
Subject: Account Security

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Good Morning!

As discussed during our meeting last week, I wanted to share our account security doc that we've been working on.

We would be grateful for any feedback and would be happy to set up a call to discuss. I am including [redacted] who you met during our meeting & are helping implement these procedures with key stakeholders. Also, [redacted] to help schedule a call to discuss, if helpful.

Many thanks for your collaboration & best for a great weekend!



From: [REDACTED]@twitter.com]
Sent: 12/1/2020 7:42:23 PM
To: [REDACTED]@cisa.dhs.gov]
CC: [REDACTED]@twitter.com]; [REDACTED]@twitter.com]; CFITF [cfitf@hq.dhs.gov]; Misinformation Reports [misinformation@cisecurity.org]
Subject: Re: FW: CIS-MIS000225 - allegations of Dominion hardware/software fraud in Gwinnett County, GA

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Hi [REDACTED] -
We have labeled the Tweet and are taking steps to limit trending on this.

On Tue, Dec 1, 2020 at 4:40 PM [REDACTED]@cisa.dhs.gov> wrote:

Hey [REDACTED]

Hope you both had a restful Thanksgiving weekend. Please see the below report from GA.

Regards,
[REDACTED]

The Cybersecurity and Infrastructure Security Agency (CISA) of the U.S. Department of Homeland Security (DHS) is not the originator of this information. CISA is forwarding this information, unedited, from its originating source – this information has not been originated or generated by CISA. This information may also be shared with law enforcement or intelligence agencies.

CISA affirms that it neither has nor seeks the ability to remove or edit what information is made available on social media platforms. CISA makes no recommendations about how the information it is sharing should be handled or used by social media companies. Additionally, CISA will not take any action, favorable or unfavorable, toward social media companies based on decisions about how or whether to use this information.

In the event that CISA follows up to request further information, such a request is not a requirement or demand. Responding to this request is voluntary and CISA will not take any action, favorable or unfavorable, based on decisions about whether or not to respond to this follow-up request for information.

From: Misinformation Reports <misinformation@cisecurity.org>
Sent: Tuesday, December 1, 2020 4:38 PM
To: [REDACTED]@cisa.dhs.gov>; CISA Central <central@cisa.dhs.gov>; CFITF <cfitf@hq.dhs.gov>; [tps@2020partnership.atlassian.net](https://t.me/2020partnership.atlassian.net); Misinformation Reports <misinformation@cisecurity.org>
Subject: CIS-MIS000225 - allegations of Dominion hardware/software fraud in Gwinnett County, GA

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

██████████ and EIP - misinformation Tweet related to Dominion hardware/software in Gwinnett County, GA.

A Gwinnett County election official confirmed the misinformation.

<https://twitter.com/██████████/status/1333641704839147520>

← Thread



██████████

Watch a Dominion Representative at Gwinnett County Election Central, responsible for tabulating ballots and certifying results, download data to a USB from the Election Management Server, plug it into a laptop, manipulate the data, then palm the USB.



Dominion Fraud (2 of 2)
From ██████████
@youtube.com

12:18 AM · Dec 1, 2020 · Twitter Web App

25.3K Retweets 4.1K Quote Tweets 37.8K Likes

From: ██████████
Sent: Tuesday, December 1, 2020 4:19 PM
To: ██████████@gwinnettcountry.com; ██████████@gwinnettcountry.com>; ██████████@gwinnettcountry.com>
Cc: ██████████@cisecurity.org>; Misinformation Reports <misinformation@cisecurity.org>
Subject: RE: Possible Gwinnett Election Misinformation

Thank you ██████████ We will report this tweet to Twitter along with your explanation. We will keep you posted.

Thanks,

██████████

From: ██████████@gwinnettcountry.com <██████████@gwinnettcountry.com>
Sent: Tuesday, December 1, 2020 4:13 PM
To: ██████████@gwinnettcountry.com>; ██████████@cisecurity.org>; ██████████@gwinnettcountry.com>

Cc: [REDACTED]@cisecurity.org>; Misinformation Reports <misinformation@cisecurity.org>
Subject: RE: Possible Gwinnett Election Misinformation

Good Afternoon

To clarify, the USB drive was not inserted into a scanner, the scanners are connected to server through cables. The images and video show a Dominion tech producing a data report on the server and saving the report to a Dominion USB thumb drive and then using a laptop to filter requested information. The Dominion servers are not equipped with Excel and counties are not authorized to install any hardware or software on these systems



From: [REDACTED]@gwinnettcounty.com>
Sent: Tuesday, December 1, 2020 3:51 PM
To: [REDACTED]@cisecurity.org>; [REDACTED]
[REDACTED]@gwinnettcounty.com>
Cc: [REDACTED]@cisecurity.org>; Misinformation Reports <misinformation@cisecurity.org>;
[REDACTED]@gwinnettcounty.com>
Subject: RE: Possible Gwinnett Election Misinformation

Hi,
Unfortunately, I'm out of the office today. I've copied [REDACTED] on this email. Earlier today he shared some information with our [REDACTED] that he can now share with you in order to help.

Thanks,
[REDACTED]

Sent via the Samsung Galaxy, an AT&T 4G LTE smartphone

----- Original message -----

From: [REDACTED]@ciscureity.org>

Date: 12/1/20 3:20 PM (GMT-05:00)

To: [REDACTED]@gwinnetcounty.com> [REDACTED]

<[REDACTED]@gwinnetcounty.com>

Cc: [REDACTED]@ciscureity.org>, Misinformation Reports <[REDACTED]@ciscureity.org>

Subject: Possible Gwinnett Election Misinformation

CAUTION: This email originated from outside of Gwinnett County Government. Maintain caution when opening links, attachments, or responding. When in doubt, contact phishing@gwinnetcounty.com.

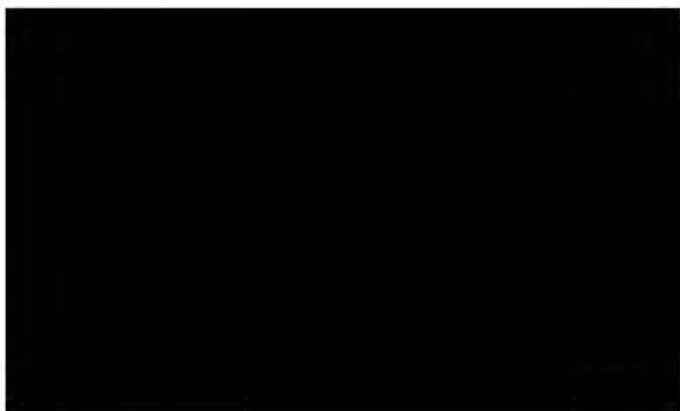
Hi [REDACTED]

The EI-ISAC, and our partners at the Election Integrity Partnership (EIP), are tracking a social media post that is gaining traction very quickly. It is likely a misunderstanding but is being portrayed on social media as some sort of nefarious act. If you can clarify for us what is being shown (if it even happened), we can work with the social media platforms to try and have the posts removed as misinformation. Please let us know as soon as possible.

URLs

[https://twitter.com/\[REDACTED\]/status/1333641704839147520](https://twitter.com/[REDACTED]/status/1333641704839147520)

Thanks,





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.....

From: [REDACTED]@fb.com]
Sent: 10/28/2020 11:46:36 AM
To: [REDACTED]@cisecurity.org]
CC: [REDACTED]@cisecurity.org]; [REDACTED]@fb.com]; [REDACTED]
[REDACTED]@cisa.dhs.gov]; [REDACTED]@fb.com]; [REDACTED]@fb.com]
Subject: Re: Facebook/CIS Meeting

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Works for me - talk then!

Sent from my iPhone

On Oct 28, 2020, at 11:18 AM, [REDACTED]@cisecurity.org> wrote:

Sorry I missed this. Can we talk at 12 ET? We can call you on the [REDACTED] number.

From: [REDACTED]@fb.com>
Sent: Wednesday, October 28, 2020 10:41 AM
To: [REDACTED]@cisecurity.org>
Cc: [REDACTED]@cisecurity.org>; [REDACTED]@fb.com>; [REDACTED]
[REDACTED]@cisa.dhs.gov>; [REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Re: Facebook/CIS Meeting

Thanks for following up! Tried to give [REDACTED] a call yesterday but know things are crazy. Feel free to call me at [REDACTED] (I'm around for the next 20 min if you happen to be free now!)

Sent from my iPhone

On Oct 28, 2020, at 9:54 AM, [REDACTED]@cisecurity.org> wrote:

Hi, [REDACTED] Just checking back on this.

Thanks!

From: [REDACTED]@cisecurity.org>
Date: Monday, October 26, 2020 at 6:13 PM
To: [REDACTED]@fb.com>, [REDACTED]@cisecurity.org>, [REDACTED]
[REDACTED]@fb.com>
Cc: [REDACTED]@cisa.dhs.gov>, [REDACTED]@fb.com>, [REDACTED]

[REDACTED]@fb.com>

Subject: Re: Facebook/CIS Meeting

Sorry, I could have been much clearer!

Let us propose an approach that balances minimal touchpoints with the election official while getting to the official directly when it's necessary:

- 1) CIS gets a misinformation report
- 2) When that report involves fb, CIS forwards it to the regional, copying CISA
- 3) If fb needs more info, fb makes that request of CIS
- 4) If CIS has that info, we provide it back to fb. If not, or you need a statement directly from them, we loop fb in with the official.

The goal for us is to make sure we're getting you everything we need from the authoritative source in our initial report. So, again, if there have been deficiencies in our reporting, let us know the details of those issues. I think the flow above will also help us get to that goal.

Over the next 8+ days we are in near constant contact with many of these officials and we have touchpoints with them outside email, so even when we don't have the info it will often be faster for us to get it for you.

I completely understand that from your perspective this is adding an unnecessary step, but it became clear from our members today that there is a very real need for CIS to help manage contacts with the many platforms.

Thanks yet again,

From: [REDACTED]@fb.com>

Date: Monday, October 26, 2020 at 4:17 PM

To: [REDACTED]@cisecurity.org>, [REDACTED]@cisecurity.org>, [REDACTED]

[REDACTED]@fb.com>

Cc: [REDACTED]@cisa.dhs.gov>, [REDACTED]@fb.com>, [REDACTED]

[REDACTED]@fb.com>

Subject: Re: Facebook/CIS Meeting

Thanks [REDACTED] – just to make sure I understand, does this mean that you are not comfortable looping us directly in with the reporting authority?

<image001.gif>

[REDACTED]
[REDACTED]@fb.com

From: [REDACTED]@cisecurity.org>
Date: Monday, October 26, 2020 at 3:58 PM
To: [REDACTED]@fb.com>, [REDACTED]@cisecurity.org>, [REDACTED]@fb.com>
Cc: [REDACTED]@cisa.dhs.gov>, [REDACTED]@fb.com>, [REDACTED]@fb.com>
Subject: Re: Facebook/CIS Meeting

Thanks, [REDACTED]

We appreciate the call today. We think a direct line from CIS to Fb's regionals will be much more efficient for everyone and CISA is agreeable to that approach.

After talking with some of our members, we don't believe it is reasonable to leave CIS out of the loop for any part of the misinformation efforts. They were adamant that the one of the critical roles for CIS in this process is to broker the interactions and take work off of their very, very full plates. They expressed that excluding CIS from the process would make their jobs more difficult, take up more of their time, and weaken our efforts to ensure a fair election. They also felt that if there is information they did not feel comfortable sharing with CIS (or any other party) over e mail, it is their responsibility to remove that party from the email.

Our focus is on making life easier for them, not for ourselves or anyone else. We need to make that the priority. We urge you work directly through us and allow us to broker any additional information gathering from our members .

This will help us serve them best and will avoid the scenario where representatives from facebook, twitter, nextdoor, snap, tiktok, and others are all reaching out to them, potentially about a single report that they submitted to us, likely requesting the same or similar information.

To hasten action on misinformation, we believe it's best if Fb provides CIS with specific feedback on what you've found lacking in submissions so we can ensure that we have that information before we send it on to you. That will help your efforts as well as cross-platform efforts.

I'd be remiss to not mention that our members felt strongly about the importance of accountability in this process. With the extraordinary pace our members are carrying right now, CIS is in a better position to track which platforms have responded and how. It's in the nation's interest that we have an understanding of how various platforms are managing and responding to reports of misinformation submitted by authoritative sources. This is another role that CIS plays and one that our members have expressed is of utmost importance for this election and beyond .

I hope this is all agreeable to you. We're happy to have a follow up call if you'd like .

Thanks again,
[REDACTED]

From: [REDACTED]@fb.com>
Date: Monday, October 26, 2020 at 12:57 PM
To: [REDACTED]@cisecurity.org>, [REDACTED]@fb.com>
Cc: [REDACTED]@cisa.dhs.gov>, [REDACTED]@fb.com>, [REDACTED]@cisecurity.org>, [REDACTED]@fb.com>
Subject: Re: Facebook/CIS Meeting

Hi [REDACTED],

Thanks for taking the time to meet with us this morning! I'm attaching my team's regional divide to this email, and look forward to connecting later today after you've had a chance to connect with some of your stakeholders.

Best,

<image002.gif>



From: [REDACTED] <[REDACTED]@cisecurity.org>

Date: Friday, October 23, 2020 at 6:09 PM

To: [REDACTED] <[REDACTED]@fb.com>

Cc: [REDACTED] <[REDACTED]@cisa.dhs.gov>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@cisecurity.org>, [REDACTED] <[REDACTED]@fb.com>

Subject: RE: Facebook/CIS Meeting

That's great. I just accepted.

[REDACTED]

From: [REDACTED] <[REDACTED]@fb.com>

Sent: Friday, October 23, 2020 5:27 PM

To: [REDACTED] <[REDACTED]@cisecurity.org>

Cc: [REDACTED] <[REDACTED]@cisa.dhs.gov>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@cisecurity.org>, [REDACTED] <[REDACTED]@fb.com>

Subject: RE: Facebook/CIS Meeting

Hi Aaron –

How about 11a ET on Monday, October 26?

I've sent over a calendar hold with the below dial-in details for the call.

Best,

WAYS TO JOIN

Computer or Mobile

Facebook Meeting Room and Portal:

Use the touch panel in your room or Portal to enter the join code

Telephone:

Dial in

or

Dial an alternative number from

From: @cisecurity.org>

Sent: Friday, October 23, 2020 1:18 PM

To: @fb.com>

Cc: @cisa.dhs.gov>; @fb.com>;

@fb.com>; @cisecurity.org>; @fb.com>

Subject: RE: Facebook/CIS Meeting

Sounds good. We are flexible on Monday outside of 12:30-2p ET. Let us know what times work for you.

Thanks,

From: @fb.com>

Sent: Friday, October 23, 2020 1:13 PM

To: @cisecurity.org>

Cc: @cisa.dhs.gov>; @fb.com>;

@fb.com>; @cisecurity.org>; @fb.com>

Subject: Re: Facebook/CIS Meeting

Sorry — just getting to this.

My schedule has blown up a bit today so may need to punt until Monday.

to help schedule and provide dial in.

Many thanks, all!

Sent from my iPhone

On Oct 23, 2020, at 12:01 PM, [REDACTED]@cisecurity.org> wrote:

[REDACTED]
Adding [REDACTED] on my side. We are free between 1-3pm ET today. How is 1pm ET for everyone?

Thanks,
[REDACTED]

From: [REDACTED]@fb.com>

Sent: Friday, October 23, 2020 10:04 AM

To: [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisecurity.org>

Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>

Subject: Re: Facebook/CIS Meeting

Many thanks, [REDACTED]

[REDACTED] who leads our outreach to State Election Officials and [REDACTED] to help schedule.

Let us know if you have some time later today or an afternoon early next week to discuss some refinements to the reporting structure.

Many thanks,
[REDACTED]

Sent from my iPhone

On Oct 23, 2020, at 9:51 AM, [REDACTED]@cisa.dhs.gov> wrote:

[REDACTED]

I've spoken with [REDACTED] at CIS about getting together for a call to discuss reporting and he's open to having the conversation. I have cc'd him here to facilitate you all finding a time that works. Feel free to invite me (or not) if I can be helpful.

Regards,

[REDACTED]

[REDACTED]
Countering Foreign Influence Task Force
DHS/CISA/NRMC
[REDACTED]@cisa.dhs.gov

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From: [REDACTED]@cisecurity.org]
 Sent: 10/7/2020 3:33:22 PM
 To: [REDACTED]@twitter.com]
 CC: [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov];
 [REDACTED]@twitter.com
 Subject: RE: EI-ISAC & Other

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

[REDACTED]
 It has not, goes out end of day. We will pull the link.

[REDACTED]
 [REDACTED] EI-ISAC
 [REDACTED]@cisecurity.org

24x7 Security Operations Center

[REDACTED]@cisecurity.org - [REDACTED]



From: [REDACTED]@twitter.com>
 Sent: Wednesday, October 7, 2020 12:37 PM
 To: [REDACTED]@cisecurity.org>
 Cc: [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>;
 [REDACTED]@twitter.com
 Subject: Re: EI-ISAC & Other

Hi [REDACTED] has the EI-ISAC notice gone out yet? We are not reaching critical mass so we are likely to postpone. (It is almost like these guys are administering an election out there!) If the note hasn't gone out, please pull the info about tomorrow's training. But feel free to leave in the information about PSP -- that work is ongoing. If it has gone out, we will just notify any folks who register ourselves.

Thanks so much!

On Tue, Oct 6, 2020 at 11:06 AM [REDACTED]@cisecurity.org> wrote:

Hi [REDACTED]

Yes, we keep events in our distribution until they happen so it will go out with our next product tomorrow afternoon.

██████████

██████████

██████████ EI-ISAC
 ██████████@cisecurity.org

██████████

24x7 Security Operations Center

██████████@cisecurity.org - ██████████



From: ██████████@twitter.com>

Sent: Monday, October 5, 2020 3:55 PM

To: ██████████@cisa.dhs.gov> ██████████@cisa.dhs.gov>

██████████@cisa.dhs.gov>

Cc: ██████████@twitter.com

Subject: Re: EI-ISAC & Other

Hi ██████████ is it possible to send out the invitation to the training for state and locals again? Our RSVPs are essentially non-existent.

State and Local Election Officials: Please join Twitter on Thursday, October 8 from 3:30 - 4:30 pm EST for a training on creative and effective content strategies on Twitter in advance of the U.S. Election. You will hear the latest on product updates, best practices, and strategy for creating engaging content! Time for Q&A will be reserved at the end. RSVP here: <https://trainingforuselectionpartners.splashthat.com/>

On Thu, Oct 1, 2020 at 11:06 AM ██████████@twitter.com> wrote:

Thank you so much for sending it out. The ██████████@Twitter.com still absolutely works!

On Thu, Oct 1, 2020 at 10:52 AM ██████████@cisecurity.org> wrote:

Hi ██████████

Hopefully you've gotten some signups. I just learned a one pager another part of CIS shared with the community included the older [REDACTED]@twitter.com email. We'll be updating going forward to the PSP address but do we need to go back to folks that have that to correct or will that still work?

[REDACTED]

[REDACTED]

[REDACTED]-ISAC

[REDACTED]@cisecurity.org

[REDACTED]

24x7 Security Operations Center

[REDACTED]@cisecurity.org - [REDACTED]



From: [REDACTED]@twitter.com>
 Sent: Tuesday, September 29, 2020 4:23 PM
 To: [REDACTED]@cisecurity.org>
 Cc: [REDACTED]@twitter.com
 Subject: Re: EI-ISAC & Other

[REDACTED] -- apologies for the typo -- RSVP is in the first paragraph twice. Thank you in advance for fixing my hasty mistake :)

On Tue, Sep 29, 2020 at 4:17 PM [REDACTED]@twitter.com> wrote:

Hi [REDACTED] are you able to add these two updates to your weekly news alert that is distributed to state and local election officials? Thank you!

(1) State and Local Election Officials: Please join Twitter on Thursday, October 8 from 3:30 - 4:30 pm EST for a training on creative and effective content strategies on Twitter in advance of the U.S. Election. You will hear the latest on product updates, best practices, and strategy for creating engaging content! Time for Q&A will be reserved at the end. RSVP here: [RSVP link here: https://trainingforuselectionpartners.splashtat.com/](https://trainingforuselectionpartners.splashtat.com/)

(2) We are onboarding state and local election officials onto Twitter's Partner Support Portal. The Partner Support Portal is a dedicated way for critical stakeholders -- like you -- to flag concerns directly to Twitter. These concerns can include technical issues with your account and content on the platform that may violate our policies. Email PSPOnboarding@Twitter.com to enroll.

And please note the URL name -- it sometimes prompts an erroneous autocorrect. Please let me know if you have any questions!

Thank you,

[Redacted]

On Thu, Sep 17, 2020 at 1:22 PM [Redacted] <[\[Redacted\]@cisecurity.org](mailto:[Redacted]@cisecurity.org)> wrote:

[Redacted]

Please forgive for the delayed response. Typically, with private sector partners we would feature new initiatives in our weekly news alert (Wednesday afternoons) with a one paragraph summary. We typically link to some sort of public reporting, whether you have a release on PSP or a page where you've been directing sign-ups that we can point folks to. With regards to the training, we have an "upcoming events" section in the same product that we can include links for signup/webinar location or an email to contact.

Let me know,

Best,

[Redacted]

[Redacted]

[Redacted] E-ISAC

[Redacted] <[\[Redacted\]@cisecurity.org](mailto:[Redacted]@cisecurity.org)>

[Redacted]

24x7 Security Operations Center

[Redacted] <[\[Redacted\]@cisecurity.org](mailto:[Redacted]@cisecurity.org)> - [Redacted]



Malicious Domain Blocking and Reporting (MDBR) Prevent IT systems from connecting to harmful web domains at no cost. Sign up for more.

From: [REDACTED] <[\[REDACTED\]@cisa.dhs.gov](mailto:[REDACTED]@cisa.dhs.gov)>

Sent: Wednesday, September 2, 2020 3:33 PM

To: [REDACTED] <[\[REDACTED\]@twitter.com](mailto:[REDACTED]@twitter.com)>; [REDACTED] <[\[REDACTED\]@cisa.dhs.gov](mailto:[REDACTED]@cisa.dhs.gov)>

Cc: [REDACTED] <[\[REDACTED\]@twitter.com](mailto:[REDACTED]@twitter.com)>; [REDACTED] <[\[REDACTED\]@cisa.dhs.gov](mailto:[REDACTED]@cisa.dhs.gov)>; [REDACTED]

[REDACTED] <[\[REDACTED\]@cisa.dhs.gov](mailto:[REDACTED]@cisa.dhs.gov)>; [REDACTED] <[\[REDACTED\]@cisaecurity.org](mailto:[REDACTED]@cisaecurity.org)>

Subject: RE: EI-ISAC & Other

[REDACTED]

I have cc'd [REDACTED] the EI-ISAC on this email.

Also, if you have items that we can share through our channels we are happy to take a look.

[REDACTED]

[REDACTED]

[REDACTED]

Department of Homeland Security

Cybersecurity & Infrastructure Security Agency (CISA)

[REDACTED] <[\[REDACTED\]@hq.dhs.gov](mailto:[REDACTED]@hq.dhs.gov)>

From: [REDACTED] <[\[REDACTED\]@twitter.com](mailto:[REDACTED]@twitter.com)>

Sent: Wednesday, September 2, 2020 3:06 PM

To: [REDACTED] <[\[REDACTED\]@cisa.dhs.gov](mailto:[REDACTED]@cisa.dhs.gov)>; [REDACTED]

[REDACTED] <[\[REDACTED\]@cisa.dhs.gov](mailto:[REDACTED]@cisa.dhs.gov)>

Cc: [REDACTED] <[\[REDACTED\]@twitter.com](mailto:[REDACTED]@twitter.com)>

Subject: EI-ISAC & Other

Long lost friends, how are you? Hope you got in a few quick breaks this August.

Do you have contact information for the team at the EI-ISAC? We want to send a message to state and local election officials inviting them: (1) to be onboarded to the Partner Support Portal (previously this was reserved only for state-level; we are now expanding for locals) and (2) a training for best-practices on creating credible and engaging content.

Any other issues we should be connecting on?

Thanks,



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This message and attachments may contain confidential information. If it appears that this message was sent to you by mistake, any retention, dissemination, distribution or copying of this message and attachments is strictly prohibited. Please notify the sender immediately and permanently delete the message and any attachments.

From: [REDACTED]@fb.com]
Sent: 8/3/2020 1:30:05 PM
To: [REDACTED]@ciscureity.org]; [REDACTED]@ciscureity.org]; [REDACTED]@fb.com]; [REDACTED]@fb.com]; [REDACTED]@fb.com]; [REDACTED]@fb.com]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@sso.org]; [REDACTED]@sso.org]; [REDACTED]@nased.org]
CC: [REDACTED]@fb.com]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@ciscureity.org]; [REDACTED]@ciscureity.org]; [REDACTED]@ciscureity.org]; [REDACTED]@ciscureity.org]
Subject: RE: Call with CIS/NASS/NASED and Facebook, RE: Social Media Misinformation Reporting Portal

Hello [REDACTED] -- Very much appreciate the follow up. I believe [REDACTED] has been in touch and provided some initial feedback already on the portal -- thank you for being open to the input.

As for further integrating the portal into Facebook at this time, the consensus view is that it would be premature right now given ongoing feedback on the portal and other open questions, especially with less than 100 days until the US2020 election. This is also in light of our significant investment, attention, and commitment to our state and local partners, as well as our collaboration within industry and with our government stakeholders to make sure existing systems and processes are honed, ready, and up to par.

Also, for fuller transparency, we shared with members of our legal team the draft terms of service, and there are concerns (echoed on the policy side), about definitions and controls about who has access to "case information," which remains undefined, so that is at least one area that would need further clarification and certainty, among others, to which our prior questions have alluded.

We also remain unclear on how many states have been onboarded to the portal, what the training and technical assistance plan is for onboarded users, and how quality assurance of onboarded users and how they would be using the portal and what they would be surfacing would be validated, monitored, and maintained.

We are happy to continue to provide feedback and explore ways to improve the portal, and are grateful for the opportunity to engage.

From: [REDACTED]@ciscureity.org>
Sent: Sunday, July 26, 2020 3:02 PM
To: [REDACTED]@fb.com>; [REDACTED]@ciscureity.org>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@cisa.dhs.gov>; [REDACTED]@sso.org>; [REDACTED]@sso.org>; [REDACTED]@nased.org>
Cc: [REDACTED]@fb.com>; [REDACTED]@hq.dhs.gov>; [REDACTED]@cisa.dhs.gov>; [REDACTED]@cisa.dhs.gov>; [REDACTED]@ciscureity.org>; [REDACTED]@ciscureity.org>; [REDACTED]@ciscureity.org>
Subject: RE: Call with CIS/NASS/NASED and Facebook, RE: Social Media Misinformation Reporting Portal

[REDACTED]

Thanks for your note. I am attaching an updated version of the Terms of Use for the Portal. Users will be required to agree to these terms upon access to the portal. This document, coupled with the recognition that the users (partners) of the Misinformation Reporting Portal are elected or appointed officials with formal election responsibilities should provide Facebook with clarity with regard to vetting of users and the processes used to help ensure that mis- and disinformation reports submitted to Facebook are valid. In fact, the Portal will clearly strengthen the current processes used to report information to Facebook.



From: [redacted]@fb.com>
 Sent: Monday, July 20, 2020 5:44 PM
 To: [redacted]@ciscureity.org>; [redacted]@ciscureity.org>; [redacted]@fb.com>; [redacted]@fb.com>; [redacted]@fb.com>; [redacted]@fb.com>; [redacted]@fb.com>; [redacted]@cisa.dhs.gov>; [redacted]@ss0.org>; [redacted]@ss0.org>; [redacted]@nased.org>
 Cc: [redacted]@fb.com>; [redacted]@hq.dhs.gov>; [redacted]@cisa.dhs.gov>; [redacted]@cisa.dhs.gov>; [redacted]@ciscureity.org>; [redacted]@ciscureity.org>; [redacted]@ciscureity.org>
 Subject: RE: Call with CIS/NASS/NASED and Facebook, RE: Social Media Misiinformation Reporting Portal

Thank you, [redacted]. Will need some time for our teams to review the input and confer further internally on feasibility, and 7/21 is just a bit too tight on our end. Also, engineering integration on our end is something that will need to be explored internally as we have a lot of product efforts related to US2020 readiness that are extremely high priority given that we are almost only 100 days from election day. Can you share the plan on how you will enforce the terms of service to make sure participants of the portal remain in compliance?

From: [redacted]@ciscureity.org>
 Sent: Friday, July 17, 2020 1:08 PM
 To: [redacted]@fb.com>; [redacted]@ciscureity.org>; [redacted]@fb.com>; [redacted]@fb.com>; [redacted]@fb.com>; [redacted]@fb.com>; [redacted]@fb.com>; [redacted]@cisa.dhs.gov>; [redacted]@ss0.org>; [redacted]@ss0.org>; [redacted]@nased.org>
 Cc: [redacted]@fb.com>; [redacted]@hq.dhs.gov>; [redacted]@cisa.dhs.gov>; [redacted]@cisa.dhs.gov>; [redacted]@ciscureity.org>; [redacted]@ciscureity.org>; [redacted]@ciscureity.org>
 Subject: RE: Call with CIS/NASS/NASED and Facebook, RE: Social Media Misiinformation Reporting Portal

[redacted]

Thank you for the quick turn on your questions. We have attached our responses. As you will note, many of the answers were addressed in our (Draft) Terms of Use, a good indicator we are thinking along the same lines.

As we discussed on Monday, we are ready from the CIS and elections community side to begin expanded deployment of the Portal in early August. This will provide sufficient time for the elections officials and the social media companies to be fully trained on the Portal. What we need from Facebook is to finalize the technical formats for case submission. We would also appreciate your review and comments on the Terms of Use document.

To that end, we want to keep this as streamlined and simple as possible. We ask for the following from Facebook:

1. Review the terms of use and provide any comments by July 21st. We will provide a final version later next week.
2. Arrange for a technical conversation with the appropriate person(s) at Facebook to finalize the technical formats for accepting emails from the Portal and providing case disposition or feedback via email.

It would be best to begin technical conversations on these items as soon as possible. Here are some suggested times over the next few days:

- Today –3pm – 7pm ET
- Monday (20th) – 8am-10am, after 1pm ET
- Tuesday (21st) – all day
- Wednesday (22nd) – all day

Please let us know which times work for you. We are happy to hold multiple calls to accommodate your team's schedules.

Thanks,

[Redacted]

[Redacted]
[Redacted]@cisecurity.org



From: [Redacted]@fb.com>
Sent: Thursday, July 16, 2020 7:41 AM
To: [Redacted]@cisecurity.org>; [Redacted]@cisecurity.org>; [Redacted]@fb.com>; [Redacted]@fb.com>; [Redacted]@fb.com>; [Redacted]@fb.com>; [Redacted]@fb.com>; [Redacted]@cisa.dhs.gov>; [Redacted]@sso.org>; [Redacted]@sso.org>; [Redacted]@nased.org>
Cc: [Redacted]@fb.com>; [Redacted]@hq.dhs.gov>; [Redacted]@cisa.dhs.gov>; [Redacted]@cisa.dhs.gov>; [Redacted]@cisecurity.org>; [Redacted]@cisecurity.org>; [Redacted]@cisecurity.org>
Subject: RE: Call with CIS/NASS/NASED and Facebook, RE: Social Media Misiinformation Reporting Portal

Thank you so much, [Redacted] – very much appreciate the time for meeting earlier this week.

- Below are the questions from our various teams (there is a wee bit of duplication on some of them, but we are erring on the side of inclusiveness for maximum understanding and insight).

- For next meeting time, should we plan on doing that after getting a sense of responses and feasibility on the below questions? From our end, early August window would be good, if you would like to suggest some time blocks (outside of Mondays and Fridays, if possible). (██████████) could reach out to (██████████) from our team who graciously help coordinate on the previous meeting).

Questions:

1. What steps will CIS take to ensure that only mis/disinformation type leads will be surfaced via the portal related to voter suppression/interference to ensure that scope is narrowly defined, and how will CIS ensure quality control?
2. What access controls will be in place to ensure that only vetted state-level and platform-level onboarded partners will have access to view and analyze the information and how will these access controls be maintained?
3. To what extent can the U.S. government, other platforms, and others view back and forth with platforms and also cross-platform content or escalations, and how will this be controlled? Are you open to a version of the portal that forwards intake to a platform email, with further back and forth being handled just between the platform and the reporter (but the initial report is available to other states/platforms/portal users).
4. How will portal access be determined?
5. What is the limit on the number of people and organizations who will have access to the portal?
6. What is the data retention period for the portal?
7. Is it the expectation that the portal will be a short-term or long-term project?
8. How will the portal sort information so that it is of importance and properly sorted by various terms of service depending on the platform, so that recipients of the information will be able to triage it quickly and deconflict?
9. What quality control measures will be in place to ensure that the escalations sent to the portal are not "noise" and will be properly described and not duplicative, and also not repeats of the same already-escalated content, to avoid burdening resource, operational, and engineering bandwidth during a very high-stakes election cycle where timely response and action will be critical?
10. Is the expectation that the portal will replace the dedicated 1:1 reporting channels maintained by the platforms, either in the short or long terms?
11. How will the portal advise whether or not a particular escalation has already been reported to the platforms and avoid sending an alert when such an escalation has already been made?
12. To what extent can the portal be used to surface trends and patterns across platforms that can be shared, if of value, while maintaining direct platform-level communication from the states?
13. Which states are not yet onboarded to the portal and what is the plan for those states?
14. How will the portal be made user-friendly for the wide range of users?
15. Who will train users on the portal, trouble shoot, and provide tech support for the portal?
16. What will turn around time, both before the election, and on election day, for portal support and login issues?

- 17. How long does it take to approve access to the portal? Will there be expedited review closer to the election?
- 18. How will the portal enable platform-specific back and forth?
- 19. Will the portal provide links and not just screenshots to enable swift actioning of context?
- 20. How does the portal plan to surface behavior-type or pattern-type signals, as opposed to discrete pieces of content?
- 21. How will the portal prevent the same escalation being reported multiple times by multiple sources?
- 22. Aside from receiving "intake," and evaluating that, if possible, pursuant to platform-specific terms of service, what are other expectations of engagement from the platforms?

From: [redacted]@cisecurity.org>
Sent: Wednesday, July 15, 2020 9:00 AM
To: [redacted]@cisecurity.org>; [redacted]@fb.com>; [redacted]@fb.com>; [redacted]@fb.com>; [redacted]@fb.com>; [redacted]@fb.com>; [redacted]@cisa.dhs.gov>; [redacted]@sso.org>; [redacted]@sso.org>; [redacted]@nased.org>
Cc: [redacted]@fb.com>; [redacted]@hq.dhs.gov>; [redacted]@cisa.dhs.gov>; [redacted]@cisa.dhs.gov>; [redacted]@cisecurity.org>; [redacted]@cisecurity.org>; [redacted]@cisecurity.org>
Subject: RE: Call with CIS/NASS/NASED and Facebook, RE: Social Media Misinformation Reporting Portal

[redacted] and the Facebook team,

Thank you again for the call on Monday. I wanted to provide the Terms of Use I promised and recap the next steps we agreed to.

Next Steps:

- Facebook is building a list of questions and will provide to CIS after syncing up internally
- We will schedule a follow up meeting in the next two weeks. [redacted] from CIS will help coordinate schedules for us if you want to go ahead and provide her some times which work for your team.

Please let me know if you need anything in the meantime.

Thanks,

[redacted]
 [redacted]
 [redacted]@cisecurity.org





Join by phone

Tap to call in from a mobile device (attendees only)

[Redacted]

Join from a video system or application

Dial [Redacted]

You can also dial [Redacted] and enter your meeting number.

Join using Microsoft Lync or Microsoft Skype for Business

Dial [Redacted]

If you are a host, [click here](#) to view host information.

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From: [REDACTED]@cisecurity.org
 Sent: 6/17/2020 12:58:15 PM
 To: [REDACTED]@twitter.com
 CC: [REDACTED]@twitter.com]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisa.dhs.gov]; [REDACTED]@cisecurity.org]; [REDACTED]@cisecurity.org]; [REDACTED]@cisecurity.org]; [REDACTED]@cisecurity.org]; [REDACTED]@nased.org]; [REDACTED]@sso.org]; [REDACTED]@sso.org]; [REDACTED]@twitter.com]; [REDACTED]@twitter.com]; [REDACTED]@twitter.com]
 Subject: RE: Reporting Portal with CIS, NASS, NASED and Twitter

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Sorry I am just getting this to you a few minutes before our meeting. We are looking forward to talking through these .

1. Will there be some sort of agreement or terms of reference that will align all participants (reporters, government entities, companies) on objectives and usage of the portal?

Yes, we'll establish Terms of Reference (or equivalent agreements) for the portal. Broadly speaking the objectives are:

- CIS: vet election officials to ensure that all information reported to the platforms comes from the authoritative source for that information.
- Election offices: submit report of misinformation that, as the official authority a certain information, can be stated as factually inaccurate
- Social media companies: process reports and provide timely responses, to include the removal of reported misinformation from the platform where possible
- National associations: maintain awareness of occurrences of misinformation and communicate with other partners as necessary
- Other partners: not on the critical path of the initial rollout; can be discussed as the platform evolves

2. Who will have access to view/analyze reported information? Will there be any restrictions in place to dictate what can be done with this information?

This will be covered in the agreements, which will limit use of data. Broadly speaking usage will be

- CIS: access to all information and ability to analyze and communicate about that information with election offices and social media companies
- Election offices: submit report of misinformation that, as the official authority a certain information, can be stated as factually inaccurate
- National associations: access to all information and ability to analyze and communicate about that information with election offices and social media companies
- Social media companies: Access to reports necessary to investigate and come to a decision
- Other partners: not on the critical path of the initial rollout; can be discussed as the platform evolves

3. Would other companies have access to see reports for other platforms? I believe our answer is no we will not share the reports. However, based on the set of reports, we may share indications of campaigns of misinformation across platforms. What if the report has content from multiple companies? We have it setup where the samples are separated by platform. The top-level report information would be shared with any platform where a sample was provided. We are open to handling this differently and look forward to your thoughts here.

4. What is the criteria used to determine who has access to the portal? The criteria has already been determined (elections officials vetted by CIS, NASS, NASED, DHS and social media platforms). Any others will be on a case-by-case basis with a specific formal terms of access agreement. How many individuals do you anticipate having access? There are roughly 9,000 elections offices. We expect as much as half may participate in the portal over time.

5. How long will reported information be retained? **Redacted Proprietary Information**

Redacted Proprietary Information

6. How long will the portal be in operation? Just through the 2020 presidential election? **The portal will be evaluated in January 2021 regarding demonstrated benefits, potential enhancements, and opinions by the elections community regarding continued operation.**

7. Companies' terms of service vary. How will individuals know what to report? **We will cover this in the Terms of Reference and in the instructions given to users as they use the platform. The elections officials will report suspected misinformation related to elections. The platforms will have to assess the misinformation, including applicability of specific terms of service for the platform.**

8. Will there be any quality checks in place? Will there be a review of reports before they are submitted to companies? Will all reports be treated with equal priority? **The reporting mechanism has requirements on which fields are required. This validation can be altered based on the "type" of report. We are open to adding more validation based on your feedback. We do not anticipate any manual review of the content itself. The reporter can set a priority, but we should discuss the implications of that to all involved.**

9. Will partners continue to use Partner Support Portal (PSP) or will everyone migrate to this reporting tool? **We'd like to encourage election officials to use the Reporting Portal, but we believe it makes sense to continue to operate the PSP in parallel through this election and evaluate it afterward.**

Thanks,

[Redacted]

[Redacted]
[Redacted] [@cisecurity.org](https://cisecurity.org)



From: [Redacted]@twitter.com>
Sent: Tuesday, June 16, 2020 3:59 PM
To: [Redacted]@cisecurity.org>
Cc: [Redacted]@twitter.com>; [Redacted]@cisa.dhs.gov>; [Redacted]@cisa.dhs.gov>; [Redacted]@cisa.dhs.gov>; [Redacted]@cisecurity.org>; [Redacted]@cisecurity.org>; [Redacted]@cisecurity.org>; [Redacted]@cisecurity.org>; [Redacted]@nased.org>; [Redacted]@sso.org>; [Redacted]@sso.org>; [Redacted]@twitter.com>; [Redacted]@twitter.com>; [Redacted]@twitter.com>
Subject: Re: Reporting Portal with CIS, NASS, NASED and Twitter

All,

Below are some of the questions we hope to discuss during our next call. Looking forward to it!

To: [redacted]@cisecurity.org>
 Cc: [redacted]@twitter.com>; [redacted]@cisa.dhs.gov>; [redacted]
 [redacted]@cisa.dhs.gov>; [redacted]@cisa.dhs.gov>; [redacted]
 [redacted]@cisa.dhs.gov>; [redacted]@cisecurity.org>; [redacted]@cisecurity.org>;
 [redacted]@cisecurity.org>; [redacted]@cisecurity.org>; [redacted]
 [redacted]@nased.org>; [redacted]@sso.org>; [redacted]@sso.org>; [redacted]
 [redacted]@twitter.com>; [redacted]@twitter.com>; [redacted]@twitter.com>

Subject: Re: Reporting Portal with CIS, NASS, NASED and Twitter

Hi [redacted]

Thanks again for this group's time yesterday. Can we schedule our next follow-up for next Wednesday from 1-2pm? We'll share some of our questions ahead of that call to help inform our discussion.

Also, would you be able to help us establish some log-ins for us to test out the tool?

Thanks!

[redacted]

On Wed, Jun 3, 2020 at 4:52 PM [redacted]@cisecurity.org> wrote:

[redacted]

That works for us here at CIS [redacted] will send an invite shortly.

Thanks,

[redacted]

[redacted]

[redacted]

[redacted]@cisecurity.org

[redacted]



Cc: [redacted]@twitter.com>; [redacted]@cisa.dhs.gov>; [redacted]
[redacted]@cisa.dhs.gov>; [redacted]@cisa.dhs.gov>; [redacted]
[redacted]@cisa.dhs.gov>; [redacted]@cisecurity.org>; [redacted]
[redacted]@cisecurity.org>; [redacted]@cisecurity.org>; [redacted]
[redacted]@cisecurity.org>; [redacted]@nased.org>; [redacted]@sso.org>; [redacted]
[redacted]@sso.org>

Subject: Re: Reporting Portal with CIS, NASS, NASED and Twitter

Hi [redacted]

Thank you for your email and for your time last week. We support your goals in establishing this tool, but still need to run some traps internally regarding options to receive the info and provide feedback. Happy to schedule a follow-up call next week, though we may still have more questions than feedback at that point. If that works for you all, let's aim for 4:30 pm EST.

Best,

[redacted]

On Thu, May 21, 2020 at 3:25 PM [redacted]@cisecurity.org> wrote:

[redacted]

Thank you so much for the call last Monday. I hope it proved helpful as you went back to your team at Twitter. With the elections nearing, we are eager to hear if you have anything you can share from your internal conversations. Are you available for a 30 min follow up call next week? We have a few time slots next Thursday if any of these work for you: 9-10am, 2-2:30pm, and 4-5pm (Eastern). If these don't work for you, we can shuffle some schedules around. Just let us know what works best for you.

Thanks,

[redacted]

[redacted]

[redacted]

[redacted]@cisecurity.org



-----Original Appointment-----

From: [REDACTED]@cisa.dhs.gov>

Sent: Wednesday, May 6, 2020 9:31 AM

To: [REDACTED]

Cc: [REDACTED]

Subject: Reporting Portal with CIS, NASS, NASED and Twitter

When: Monday, May 11, 2020 2:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: WebEx invite just sent separately – please use that information

Sent a separate invite to use WebEx for the meeting. Please let me know if you don't receive the WebEx invite.

Thanks,

[REDACTED]

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From: [REDACTED]@google.com]
Sent: 4/20/2020 12:18:53 PM
To: [REDACTED]@cdc.gov]
CC: [REDACTED]@google.com]; Crawford, Carol Y. [REDACTED]
[REDACTED]@cdc.gov]
Subject: Re: Question Hub users
Attachments: CDC & Question Hub - COVID EAP Partner Presentation .pdf

Hi [REDACTED]

Thanks for sharing CDC contacts for the Question Hub early access program. We will whitelist access for the three accounts today. Once whitelisted, the next step is to login to the tool (at questionhub.google.com) with the whitelisted accounts and begin submitting links for created content on CDC web surfaces! The tool is fairly easy to use and instructions can be found in Page 5 of the attached presentation.

Let me know if you or the team have any questions as you use the tool and please do give us a heads up when your team has begun submitting answers.

Thanks,
[REDACTED]

On Mon, Apr 20, 2020 at 7:56 AM [REDACTED]@cdc.gov> wrote:

Hi [REDACTED]

We would like to start with just three persons for the Question Hub pilot. Carol Crawford [REDACTED] [REDACTED]@cdc.gov) and myself [REDACTED]@cdc.gov). We will evaluate it and then decide who would be best to include for CDC.

Please provide a link or instructions to get to the hub.

Thank you again for this opportunity and all that Google is doing for this pandemic.

[REDACTED]

--
[REDACTED]@google.com

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

**The State of Missouri and the State of
Louisiana,**

Plaintiffs,

v.

**President Joseph R. Biden, Jr., in his
official capacity as President of the United
States of America, et. al.,**

Defendants.

Civil Action No. 22-cv-1213

**DEFENDANT KARINE JEAN-PIERRE OBJECTIONS AND RESPONSES TO
PLAINTIFFS' REQUESTS FOR THE PRODUCTION OF DOCUMENTS**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Defendant Karine Jean-Pierre, in her official capacity as White House Press Secretary, by and through her undersigned counsel, hereby submits the following objections and responses to Plaintiffs' Requests for the Production of Documents ("RFPs").

Objections to Definitions and Instructions

1. Defendant objects to the definitions of "Content Modulation," and the related term "Misinformation," including to the extent that Plaintiffs' definition of "Content Modulation" covers actions by Social Media Companies beyond those taken against content containing Misinformation and against users posting content containing Misinformation (such as actions taken as to any post on "efficacy of COVID-19 restrictions" or on "security of voting by mail"). For purposes of these Responses and Objections, Defendant generally defines "Misinformation" in a manner consistent with Plaintiffs' definition of that term: "any form of speech . . . considered to be potentially or actually incorrect, mistaken, false, misleading, lacking proper context, disfavored, having the tendency to deceive or mislead . . . including but not limited to any content or speech considered by

any federal official or employee or Social-Media Platform to be ‘misinformation,’ ‘disinformation,’ ‘malinformation,’ ‘MDM,’ ‘misinfo,’ ‘disinfo,’ or ‘malinfo.’” *See* RFP, Definition O. A broader definition of “Content Modulation,” or “Misinformation,” would cover subject-matter that goes beyond the scope of, and would thus not be relevant to, Plaintiffs’ claims.

2. Defendant objects to the definitions of CDC, CISA, DHS, HHS, NIAID, and White House Communications Team to the extent those definitions include “any . . . agent,” “contractors” and “any subordinate agency or entity” of those agencies on the ground that those definitions are overbroad and may include persons and entities that are not under the supervision or control of any Defendant.

3. Defendant objects to the definition of “document” to the extent it includes “documents retained on personal devices and/or in personal email accounts or other personal accounts.” Documents found on personal devices or within electronic personal accounts would not be in the custody or control of any Defendant.

4. Defendant objects to the definition of “Social-Media Platform” as overbroad, because it includes “*any* organization that provides a service for public users to disseminate . . . content . . . to other users or the public,” along with any “contractors, or any other person . . . acting on behalf of the Social-Media Platform . . . as well [as] subcontractors or entities used to conduct fact-checking or any other activities relating to Content Modulation.” The Complaint contains no nonconclusory allegation that Defendant communicated with each and every organization that allows users to “disseminate . . . content” to other users, along with any persons or entities affiliated with those organizations. Defendant will construe “Social-Media Platform” to encompass Facebook, Instagram, Twitter, LinkedIn, and YouTube.

5. Defendant objects to the definition of “You” and “Your” as overbroad as it includes “any officers, officials, employees, agents, staff members, contractors, or other(s) acting at the

direction of Jennifer Rene Psaki, in her official capacity as Press Secretary, or at the direction of her successor.” Such a definition is not proportional to the needs of the case to the extent it is interpreted to extend beyond the White House Office of the Press Secretary, especially given the expedited, abbreviated discovery process where Defendant has only a limited amount of time to conduct a document search and produce responsive documents. Defendant has interpreted this request as applying solely to the White House Office of the Press Secretary.

6. Defendant objects to Instruction 1. Plaintiffs cite to no authority requiring a recipient of discovery requests to “describe the efforts [it has] made to locate . . . document[s]” that are not in its custody and control “and identify who has control of the document and its location.”

7. Defendant objects to Instruction 2 to the extent it exceeds the requirements of F.R.C.P. 26(b)(6).

8. Defendant objects to Instruction 3. Plaintiffs cite to no authority indicating that, if Defendant objects to a request on burden grounds, Defendant must “stat[e] the approximate number of documents to be produced, the approximate number of person-hours to be incurred in the identification, and the estimated cost of responding to the request.” Further, it is unclear how Defendant could provide that type of information without conducting certain burdensome document searches and reviews that Defendant sought to avoid through their objections. As required by the Federal Rules of Civil Procedure, Defendant will “state with specificity the grounds for objecting to the request [at issue], including the reasons” for the objection. F.R.C.P. 34(b)(2)(B).

9. Defendant objects to Instruction 5 to the extent it requires Defendant to produce electronic documents “with all metadata and delivered in their original format.” Plaintiffs may identify the precise categories of metadata they want Defendant’s productions to contain, and Defendant can determine whether she can provide those categories of metadata without an undue burden.

10. Defendant objects to Instruction 6 to the extent that it requires Defendant to produce documents in a format other than the format in which they are “kept in the usual course of business.” F.R.C.P. 34 (b)(2)(E). Defendant objects to Instruction 6 to the extent that it requests the production of all e-mail “forwards” for e-mails produced to Plaintiffs. That request may call for the production of documents that are not found in Defendant’s e-mail files.

11. Defendant objects to Instruction 8, which applies these requests to the Office of the White House Press Secretary from January 1, 2020, to the present, as unduly broad. Ms. Psaki served as White House Press Secretary from January 20, 2021, until May 13, 2022, when Ms. Jean-Pierre became White House Press Secretary. Defendant interprets these requests as applying to when Ms. Psaki served as White House Press Secretary from January 20, 2021, through May 13, 2022, and Ms. Jean-Pierre has served as White House Press Secretary until the date the requests were served, i.e., from May 13, 2022, to July 18, 2022. Anything else would be disproportional to the needs of the case. Such disproportionality is further aggravated by the discovery burden being sought on White House officials. *See Cheney v. U.S. District Court*, 542 U.S. 367, 385 (2004).

General Objections Applicable to All Requests

1. The general objections set forth below apply to each and every discovery request discussed below. In asserting Defendant’s objections to specific discovery requests, Defendant may assert an objection that is the same as, or substantially similar to, one or more of these objections. Defendant may do so because the language of the discovery request itself may signal particular and specific concerns that the discovery request at issue may be objectionable based on the grounds stated. The fact that Defendant may specifically reference some of the objections described immediately below in their objections to Plaintiffs’ individual requests, but not others from the same list, does not indicate that Defendant has waived any of these objections as to any of Plaintiffs’ requests.

2. Defendants respectfully maintain that discovery is inappropriate in a matter such as this one challenging federal agency action. *See generally Fla. Power & Light Co. v. Lorion*, 470 U.S. 729, 743-44 (1985).

3. Defendant objects to Plaintiffs' discovery requests to the extent that they seek (a) attorney work product; (b) communications protected by the attorney-client privilege; (c) information protected by the deliberative process privilege or law enforcement privilege; (d) material the disclosure of which would violate legitimate privacy interests and expectations of persons not party to this litigation; (e) information protected by any form of executive privilege; or (f) information covered by any other applicable privilege or protection.

4. Defendant objects to these document requests seeking discovery from the White House as unduly burdensome and disproportionate to the needs of the case. *See generally Cheney*, 542 U.S. at 367. Plaintiffs' discovery requests propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See id.* at 385. Further, Plaintiffs' request for information from the White House is unduly burdensome and disproportionate to the needs of the case when Plaintiffs have not first exhausted all available opportunities to seek related information from other sources. *See Order, Centro Presente*, No. 1:18-CV-10340 (D. Mass. May 15, 2019) (requiring the plaintiff to exhaust all discovery on other defendants before considering whether there was a "continuing need for discovery sought on the White House"); *Cf. Karnoski v. Trump*, 926 F.3d 1180, 1207 (9th Cir. 2019) (vacating "district court's discovery orders because the district court did not fulfill its obligation 'to explore other avenues, short of forcing the Executive to invoke privilege'" (quoting *Cheney*, 542 U.S. at 390)).

Moreover, to the extent the discovery seeks internal communications involving White House personnel, it is inappropriate because it may have the effect of seeking information protected by the presidential communications privilege, a "presumptive privilege" "fundamental to the operation of

Government and inextricably rooted in the separation of powers under the Constitution” that attaches to presidential communications. *United States v. Nixon*, 418 U.S. 683, 708 (1974). See *In re Sealed Case*, 121 F.3d 729, 743-44 (D.C. Cir. 1997). Although the presidential communications privilege can be overcome by showing a “specific need” in a criminal case, *Judicial Watch, Inc. v. Dep’t of Justice*, 365 F.3d 1108, 1112 (D.C. Cir. 2004), the presumption against disclosure is even higher in a civil case like this one. *Am Historical Ass’n v. Nat’l Archives & Records Admin.*, 402 F. Supp. 2d 171, 181 (D.D.C. 2005). Such discovery violates the separation of powers and creates an undue burden and distraction from those individuals’ critical executive responsibilities. See *Cheney*, 542 U.S. at 389.

5. Defendant objects to each Request to the extent it seeks documents that are not in the custody or control of any Defendant.

6. Defendant objects to each Request to the extent it seeks all communications and documents from each Defendant relating to the substantive topic identified in the Request. The parties are currently involved in an expedited, abbreviated discovery process where Defendant has only a limited amount of time to conduct a document search and produce responsive documents.

7. Defendant specifically reserves the right to make further objections as necessary to the extent additional issues arise regarding the meaning of and/or information sought by Plaintiffs’ discovery requests.

Objections to Specific Requests for the Production of Documents

Request 1: Produce all Documents identified, referred to, or relied on in answering Plaintiffs’ Interrogatories to You, including all Communications identified in response to those Interrogatories.

Response: In addition to the foregoing general objections, Defendant objects to this Request as vague because it is unclear what it means to “rel[y]” on a document, as compared to “referr[ing]” to a document, in answering an Interrogatory. Defendant also objects to this Request to the extent it requests

internal, deliberative documents, materials covered by the attorney client or work product privileges, or other privileged materials, as the Request broadly seeks any and all documents relied on in responding. Additionally, challenges to administrative agency action are ordinarily not subject to discovery.

Further, Defendant objects to this Request on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportionate to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.*, Order, *Centro Presente*, No. 1:18-CV-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d at 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. Finally, Defendant objects to this request to the extent it is directed to internal documents protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such documents, the request imposes a burden on Defendant to locate documents, review them, and justify their withholdings that is disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-privileged documents. *See Cheney*, 542 U.S. at 389.

Request 2: Produce all Communications with any Social-Media Platform relating to Misinformation and/or Content Modulation.

Response: In addition to the foregoing general objections, Defendant objects to this Request overbroad, unduly burdensome, and not proportional to the needs of this case. This Request calls for *any and all* communications from Defendant or any employee or subordinate of Defendant, to *any and all* Social-Media Platforms, even if those platforms are not at issue in the Complaint. Defendant cannot conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule. Defendant also

understands this request to seek only communications between Defendant and third parties outside the government. To the extent that this request seeks internal documents or records referring to such communications, Defendant objects to the request as not proportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery. Defendant also objects to such a request to the extent it would seek internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to such communications. Additionally, challenges to administrative agency action are ordinarily not subject to discovery.

Further, Defendant objects to this Request on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportionate to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.,* Order, *Centro Presente*, No. 1:18-CV-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d at 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. Finally, Defendant objects to this request to the extent it is directed to internal documents protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such documents, the request imposes a burden on Defendant to locate documents, review them, and justify their withholdings that is disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-privileged documents. *See Cheney*, 542 U.S. at 389.

Request 3: Produce all Communications with any Social-Media Platform that contain any of the Search Terms.

Response: In addition to the foregoing general objections, Defendant objects to this Request as

unduly burdensome, overbroad, and not proportional to the needs of this case. This Request calls for *any and all* specified documents from Defendant or any employee or subordinate of Defendant. Defendant cannot conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule. Furthermore, this Request covers documents that are not relevant to Plaintiffs' claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning "the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications." ECF No. 34 at 13. This Request, however, would require the production of any document that contains any of Plaintiffs' Search Terms, regardless of whether that document pertains to content moderation with respect to misinformation on social media platforms. Plaintiffs' Search Terms include many broad terms that could be found in e-mails that have nothing to do with misinformation, such as "election," "antitrust," and "Kennedy." Defendant also understand this Request to seek only communications between Defendant and third parties outside the government. To the extent that this Request seeks internal documents or records referring to such communications, Defendant objects to the request as not proportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery. Defendant also objects to this Request to the extent it seeks internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to such communications. Additionally, challenges to administrative agency action are ordinarily not subject to discovery.

Further, Defendant objects to this Request on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportionate to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House.

See, e.g., Order, *Centro Presente*, No. 1:18-CV-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d at 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. Finally, Defendant objects to this request to the extent it is directed to internal documents protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such documents, the request imposes a burden on Defendant to locate documents, review them, and justify their withholdings that is disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-privileged documents. *See Cheney*, 542 U.S. at 389.

Request 4: Produce organizational charts of any Social-Media Platform that identify the persons with whom You communicate relating to Misinformation and/or Content Modulation.

Response: In addition to the foregoing general objections, Defendant objects to this Request to the extent it seeks organizational charts for third party Social-Media Platforms that would not ordinarily be kept by Defendant in the ordinary course of business. Accordingly, this Request would not be proportional to the needs of the case, particularly in light of the Court’s order permitting Plaintiffs to seek such information directly from the third parties themselves. Defendant also objects to this Request because it calls for documents that are not relevant to Plaintiffs’ claims and that do not fall within the scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. The organizational charts identified in this Request would not identify any “federal officials” who have been “communicating with social-media platforms” about misinformation, nor would it describe the contents of those communications.

Additionally, challenges to administrative agency action are ordinarily not subject to discovery.

Further, Defendant objects to this Request on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportionate to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.,* Order, *Centro Presente*, No. 1:18-CV-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d at 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. Finally, Defendant objects to this request to the extent it is directed to internal documents protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such documents, the request imposes a burden on Defendant to locate documents, review them, and justify their withholdings that is disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-privileged documents. *See Cheney*, 542 U.S. at 389.

Request 5: Produce all Documents and Communications relating to any communication or coordination between Social-Media Platform and any “member of our senior staff” and/or “member of our COVID-19 team,” who are “in regular touch with ... social media platforms,” as You stated at a White House press briefing on or around July 15, 2021.

Response: In addition to the foregoing general objections, Defendant objects to this Request as vague because it relies on a characterization of a statement made by an individual no longer in government, and the statement does not specify the individuals at issue or the specific communications referenced. Defendant further objects to this Request as unduly burdensome and not proportional to the needs of the case. This Request calls for *any and all* specified documents from Defendant or any employee or subordinate of Defendant. To conduct an exhaustive search to uncover all documents responsive to

this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Defendant also objects to this Request as overbroad because it calls for documents that are not relevant to Plaintiffs' claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning "the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications." ECF No. 34 at 13. This Request appears to call for communications with Social-Media Platforms regardless of whether they pertain to content moderation with respect to misinformation. Defendant also objects to this Request to the extent it seeks internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to such communications. Additionally, challenges to administrative agency action are ordinarily not subject to discovery.

Further, Defendant objects to this Request on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportionate to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.,* Order, *Centro Presente*, No. 1:18-CV-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d at 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. Finally, Defendant objects to this request to the extent it is directed to internal documents protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such documents, the request imposes a burden on Defendant to locate documents, review them, and justify their withholdings that is disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-privileged documents. *See Cheney*, 542

U.S. at 389.

Request 6: Produce all Communications with any Social-Media Platform involving any member of the White House Communications Team that relate to Misinformation and/or Content Modulation.

Response: In addition to the foregoing general objections, Defendant objects to this Request because it seeks documents that are not in the Defendant's custody or control as White House Press Secretary, namely, all Communications with any Social-Media Platform involving *any* member of the White House Communications Team, which Plaintiffs define to include "any person with an email domain of @who.eop.gov." Defendant further objects to this Request as unduly burdensome and not proportional to the needs of the case. This Request calls for *any and all* specified documents from any person with an email domain of @who.eop.gov. Even if all of those documents were in Defendant's custody or control, it would be impractical, unduly burdensome, and disproportionate to the needs of the case for Defendant to conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule. Defendant also understands this Request to seek only communications between Defendant and third parties outside the government. To the extent that this Request seeks internal documents or records referring to such communications, the Request would be even more disproportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery. Defendant also objects to this Request to the extent it seeks internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to such communications. Additionally, challenges to administrative agency action are ordinarily not subject to discovery.

Further, Defendant objects to this Request on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportionate to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House.

See, e.g., Order, *Centro Presente*, No. 1:18-CV-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d at 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. Finally, Defendant objects to this request to the extent it is directed to internal documents protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such documents, the request imposes a burden on Defendant to locate documents, review them, and justify their withholdings that is disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-privileged documents. *See Cheney*, 542 U.S. at 389.

Request 7: Produce all Communications with any Social-Media Platform that relate to the “12 people who are producing 65 percent of the anti-vaccine misinformation on social-media platforms,” as You stated at a White House press briefing on or around July 15, 2021.

Response: In addition to the foregoing general objections, Defendant objects to this Request as vague because it relies on a characterization of a statement made by an individual no longer in government, and the statement does not specify the individuals at issue or the specific communications referenced. Defendant further objects to this Request as unduly burdensome and not proportional to the needs of the case. This Request calls for *any and all* specified documents from Defendant or any employee or subordinate of Defendant. To conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Defendant also objects to this Request as overbroad because it calls for documents that are not relevant to Plaintiffs’ claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have

been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. This Request appears to call for communications with Social-Media Platforms regardless of whether they pertain to content moderation with respect to misinformation. Defendant also objects to this Request to the extent it seeks internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to such communications. Additionally, challenges to administrative agency action are ordinarily not subject to discovery.

Further, Defendant objects to this Request on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportionate to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.,* Order, *Centro Presente*, No. 1:18-CV-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d at 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. Finally, Defendant objects to this request to the extent it is directed to internal documents protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such documents, the request imposes a burden on Defendant to locate documents, review them, and justify their withholdings that is disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-privileged documents. *See Cheney*, 542 U.S. at 389.

Request 8: Produce all Documents and Communications with any Social-Media Platforms that You “engage with ... regularly” that relate to “what [Y]our asks are” to such Social-Media Platform(s), as You stated at the White House press briefing on or around July 15, 2021.

Response: In addition to the foregoing general objections, Defendant objects to this Request as

vague because it relies on a characterization of a statement made by an individual no longer in government, and the statement does not specify the individuals at issue or the specific communications referenced. Defendant further objects to this Request as unduly burdensome and not proportional to the needs of the case. This Request calls for *any and all* specified documents from Defendant or any employee or subordinate of Defendant. To conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Defendant also objects to this Request as overbroad because it calls for documents that are not relevant to Plaintiffs' claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning "the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications." ECF No. 34 at 13. This Request appears to call for communications with Social-Media Platforms regardless of whether they pertain to content moderation with respect to misinformation. Defendant also objects to this Request to the extent it seeks internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to such communications. Additionally, challenges to administrative agency action are ordinarily not subject to discovery.

Further, Defendant objects to this Request on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportionate to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.,* Order, *Centro Presente*, No. 1:18-CV-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d at 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. Finally, Defendant

objects to this request to the extent it is directed to internal documents protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such documents, the request imposes a burden on Defendant to locate documents, review them, and justify their withholdings that is disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-privileged documents. *See Cheney*, 542 U.S. at 389.

Request 9: Produce all Documents and Communications relating to any “government experts” who have “partnered with” Facebook or any Social-Media Platform to address Misinformation and/or Content Modulation.

Response: In addition to the foregoing general objections, Defendant objects to this Request as vague because it relies on a characterization of statement made by a third-party outside of government, and the statement does not specify the individuals at issue or the specific communications referenced. Defendant further objects to this Request as unduly burdensome and not proportional to the needs of the case. This Request calls for *any and all* specified documents from Defendant or any employee or subordinate of Defendant. To conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Defendant also objects to this Request as overbroad because it calls for documents that are not relevant to Plaintiffs’ claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. This Request appears to call for communications with Social-Media Platforms regardless of whether they pertain to content moderation with respect to misinformation. Defendant also objects to

this Request to the extent it seeks internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to such communications. Additionally, challenges to administrative agency action are ordinarily not subject to discovery.

Further, Defendant objects to this Request on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportionate to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.*, Order, *Centro Presente*, No. 1:18-CV-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d at 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. Finally, Defendant objects to this request to the extent it is directed to internal documents protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such documents, the request imposes a burden on Defendant to locate documents, review them, and justify their withholdings that is disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-privileged documents. *See Cheney*, 542 U.S. at 389.

Request 10: Produce all Documents and Communications relating to Your claim that federal officials “engage[] regularly with all social media platforms about steps that can be taken” to address Misinformation on social media, which engagement “has continued, and ... will continue,” as You stated at the April 25, 2022 White House press briefing.

Response In addition to the foregoing general objections, Defendant objects to this Request as vague because it relies on a characterization of statement made by a third-party outside of government, and the statement does not specify the individuals at issue or the specific communications referenced. Defendant further object to this Request as unduly burdensome and not proportional to the needs of the

case. This Request calls for *any and all* specified documents from Defendant or any employee or subordinate of Defendant. To conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Defendant also objects to this Request as overbroad because it calls for documents that are not relevant to Plaintiffs' claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning "the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications." ECF No. 34 at 13. This Request appears to call for communications with Social-Media Platforms regardless of whether they pertain to content moderation with respect to misinformation. Defendant also object to this Request to the extent it seeks internal, deliberative documents discussing such communications, attorney client documents, or other privileged materials relating to such communications. Additionally, challenges to administrative agency action are ordinarily not subject to discovery.

Further, Defendant objects to this Request on the ground that any discovery on the White House at this stage of the litigation is unduly burdensome and disproportionate to the needs of the case. Plaintiffs have not exhausted all other avenues of discovery before seeking discovery on the White House. *See, e.g.,* Order, *Centro Presente*, No. 1:18-CV-10340 (D. Mass. May 15, 2019); *Karnoski v. Trump*, 926 F.3d at 1207 (9th Cir. 2019); *Cheney*, 542 U.S. at 390. Additionally, discovery propounded on White House officials would create an undue burden, distract them from their critical executive responsibilities, and violate the separation of powers. *See Cheney*, 542 U.S. at 385. Finally, Defendant objects to this request to the extent it is directed to internal documents protected by the presidential communications privilege or other executive privileges. *See Nixon*, 418 U.S. at 708. Because Plaintiffs are not entitled to such documents, the request imposes a burden on Defendant to locate documents,

review them, and justify their withholdings that is disproportionate to the minimal benefit (if any) that Plaintiffs might derive from the possibility of responsive, non-privileged documents. *See Cheney*, 542 U.S. at 389.

Dated: August 17, 2022

Respectfully submitted,

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

**The State of Missouri and the State of
Louisiana,**

Plaintiffs,

v.

**President Joseph R. Biden, Jr., in his official
capacity as President of the United States of
America, et. al.,**

Defendants.

Civil Action No. 22-cv-1213

**DEFENDANTS DR. ANTHONY FAUCI’S AND THE NATIONAL INSTITUTE
OF ALLERGY AND INFECTION DISEASES’ OBJECTIONS TO
PLAINTIFFS’ REQUESTS FOR THE PRODUCTION OF DOCUMENTS**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Defendants Dr. Anthony Fauci, in his official capacity as Director of the National Institute of Allergy and Infectious Diseases, and the National Institute of Allergy and Infectious Diseases (collectively, “Defendants”), by and through their undersigned counsel, hereby submit the following objections to Plaintiffs’ Requests for the Production of Documents (“RFPs”).¹

Objections to Definitions and Instructions

1. Defendants object to the definitions of “Content Modulation,” and the related term “Misinformation,” including to the extent that Plaintiffs’ definition of “Content Modulation” covers actions by Social Media Companies beyond those taken against content containing Misinformation and against users posting content containing Misinformation (such as actions taken as to any post on “efficacy of COVID-19 restrictions” or on “security of voting by mail”). For purposes of these

¹ To the extent this request seeks information from Dr. Fauci in his role as Chief Medical Advisor to the President, Defendants aver that they are unaware of any separate White House e-mail account belonging to Dr. Fauci, and further aver that, to their understanding, Dr. Fauci’s direct reports and staff are affiliated with the National Institute of Allergy and Infectious Diseases.

Responses and Objections, Defendants generally define “Misinformation” in a manner consistent with Plaintiffs’ definition of that term: “any form of speech . . . considered to be potentially or actually incorrect, mistaken, false, misleading, lacking proper context, disfavored, having the tendency to deceive or mislead . . . including but not limited to any content or speech considered by any federal official or employee or Social-Media Platform to be ‘misinformation,’ ‘disinformation,’ ‘malinformation,’ ‘MDM,’ ‘misinfo,’ ‘disinfo,’ or ‘malinfo.’” *See* RFP, Definition O. A broader definition of “Content Modulation,” or “Misinformation,” would cover subject-matter that goes beyond the scope of, and would thus not be relevant to, Plaintiffs’ claims.

2. Defendants object to the definitions of CDC, CISA, DHS, HHS, NIAID, and White House Communications Team to the extent those definitions include “any . . . agent,” “contractors,” “divisions, agencies, boards, employees, contractors, and any subordinate agency or entity” of those agencies on the ground that those definitions are overbroad and may include persons and entities that are not under the supervision or control of any Defendant.

3. Defendants object to the definition of “document” to the extent it includes “documents retained on personal devices and/or in personal email accounts or other personal accounts.” Documents found on personal devices or within electronic personal accounts would not be in the custody or control of any Defendant.

4. Defendants object to the definition of “Social-Media Platform” as overbroad, because it includes “any organization that provides a service for public users to disseminate . . . content . . . to other users or the public,” along with any “contractors, or any other person . . . acting on behalf of the Social-Media Platform . . . as well [as] subcontractors or entities used to conduct fact-checking or any other activities relating to Content Modulation.” The Complaint contains no nonconclusory allegation that Defendants communicated with each and every organization that allows users to “disseminate . . . content” to other users, along with any persons or entities affiliated with those

organizations. Defendants will construe “Social-Media Platform” to encompass Facebook, Instagram, Twitter, LinkedIn, and YouTube.

5. Defendants object to the definition of “You” an “Your” as overbroad as it includes “any officers, officials, employees, agents, staff members, contractors, and other(s)” acting at the direction, or on behalf, of Dr. Fauci or the NIAID. Such a definition is not proportional to the needs of the case, especially given the expedited, abbreviated discovery process where Defendants have only a limited amount of time to conduct a document search and produce responsive documents. Defendants interpret this request as applying solely to the named Defendants.

6. Defendants object to Instruction 1. Plaintiffs cite to no authority requiring a recipient of discovery requests to “describe the efforts [it has] made to locate . . . document[s]” that are not in its custody and control “and identify who has control of the document and its location.”

7. Defendants object to Instruction 2 to the extent it exceeds the requirements of F.R.C.P. 26(b)(6).

8. Defendants object to Instruction 3. Plaintiffs cite to no authority indicating that, if Defendants object to a request on burden grounds, Defendants must “stat[e] the approximate number of documents to be produced, the approximate number of person-hours to be incurred in the identification, and the estimated cost of responding to the request.” Further, it is unclear how Defendants could provide that type of information without conducting certain burdensome document searches and reviews that Defendants sought to avoid through their objections. As required by the Federal Rules of Civil Procedure, Defendants will “state with specificity the grounds for objecting to the request [at issue], including the reasons” for the objection. F.R.C.P. 34(b)(2)(B).

9. Defendants object to Instruction 5 as unduly burdensome to the extent it requires Defendants to produce electronic documents “with all metadata and delivered in their original format.” Plaintiffs may identify the precise categories of metadata they believe they require to

adequately litigate their claims, and the parties may then meet-and-confer over the issue.

10. Defendants object to Instruction 6 to the extent that it requires Defendants to produce documents in a format other than the format in which they are “kept in the usual course of business.” F.R.C.P. 34 (b)(2)(E). Defendants object to Instruction 6 to the extent that it requests the production of all e-mail “forwards” for e-mails produced to Plaintiffs. That request may call for the production of documents that are not found in the e-mail files of the relevant custodians used by Defendants.

11. Defendants object to the Instruction in the introductory paragraph calling on Defendants to produce documents responsive to Plaintiffs’ Requests by August 17, 2022. Defendants will make rolling productions, consisting of the documents Defendants have agreed to produce herein, starting on August 17, 2022 and will endeavor to complete those productions on or before August 25, 2022.

Objections Applicable to All Requests

1. The general objections set forth below apply to each and every discovery request discussed below. In asserting Defendant’s objections to specific discovery requests, Defendants may assert an objection that is the same as, or substantially similar to, one or more of these objections. Defendants may do so because the language of the discovery request itself may signal particular and specific concerns that the discovery request at issue may be objectionable based on the grounds stated. The fact that Defendants may specifically reference some of the objections described immediately below in their objections to Plaintiffs’ individual requests, but not others from the same list, does not indicate that Defendants have waived any of these objections as to any of Plaintiffs’ requests.

2. Defendants respectfully maintain that discovery is inappropriate in a matter such as this one challenging federal agency action. *See generally Fla. Power & Light Co. v. Lorion*, 470 U.S. 729, 743-44 (1985). Challenges to administrative agency action are ordinarily not subject to

discovery. *See id.*

3. Defendants object to Plaintiffs' discovery requests to the extent that they seek (a) attorney work product; (b) communications protected by the attorney-client privilege; (c) information protected by the deliberative process privilege or law enforcement privilege; (d) material the disclosure of which would violate legitimate privacy interests and expectations of persons not party to this litigation; (e) information protected by any form of executive privilege; or (f) information covered by any other applicable privilege or protection.

4. Defendants object to each Request to the extent it seeks documents that are not in the custody or control of any Defendant.

5. Defendants object to each Request to the extent it seeks all communications and documents from each Defendant relating to the substantive topic identified in the Request. The parties are currently involved in an expedited, abbreviated discovery process where Defendants have only a limited amount of time to conduct a document search and produce responsive documents. Defendants will only produce non-privileged, responsive documents that it expressly agrees to produce herein, so long as those documents are found in the files collected from a reasonable set of custodians and contain one or more reasonable search terms.

6. Defendants specifically reserve the right to make further objections as necessary to the extent additional issues arise regarding the meaning of and/or information sought by Plaintiffs' discovery requests.

Objections to Specific Requests for the Production of Documents

Request 1: Produce all Documents identified, referred to, or relied on in answering Plaintiffs' Interrogatories to You, including but not limited to all Communications identified in response to those Interrogatories.

Response: In addition to the foregoing general objections, Defendants object to this Request as

vague because it is unclear what it means to “rel[y]” on a document, as compared to “referr[ing]” to a document, in answering an Interrogatory. Defendants also object to this Request to the extent it requests internal, deliberative documents, materials covered by the attorney client or work product privileges, or other privileged materials, as the Request broadly seeks any and all documents relied on in responding.

Subject to this objection, Defendants will produce non-privileged documents expressly identified in Defendants’ answers to the Interrogatories.

Request 2: Produce all Communications with any Social-Media Platform relating to Misinformation and/or Content Modulation.

Response: In addition to the foregoing general objections, Defendants object to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case. This Request calls for *any and all* communications from any Defendant or any employee or subordinate of any Defendant, to *any and all* Social-Media Platforms, even if those platforms are not at issue in the Complaint. Defendants cannot conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule. Defendants also understand this request to seek only communications between Defendants and third parties outside the government. Further, to the extent this Request seeks any purely internal documents or records, Defendants object to the Request as not proportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery and would be unnecessary in light of the external documents Defendants have agreed to produce. Defendants also object to this Request to the extent it seeks documents protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to the foregoing objections, Defendants will produce non-privileged e-mail communications between Defendants and employees of Facebook, Twitter, LinkedIn, Instagram, and

YouTube (the “Social-Media Platforms”) concerning Misinformation located within a review population consisting of e-mail files that (i) are collected from custodians who, having been identified through Defendants’ internal inquiry, are believed to have communicated with employees of the Social-Media Platforms (the “Custodial Social Media E-mails”),² and (ii) contain one or more of Plaintiffs’ Search Terms.

Request 3: Produce all Communications with any Social-Media Platform that contain any of the Search Terms.

Response: In addition to the foregoing general objections, Defendants object to this Request as unduly burdensome, overbroad, and not proportional to the needs of this case. This Request calls for *any and all* specified documents from any Defendant or any employee or subordinate of any Defendant. To conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Furthermore, this Request covers documents that are not relevant to Plaintiffs’ claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. This Request, however, would require the production of any document that contains any of Plaintiffs’ Search Terms, regardless of whether that document pertains to Misinformation. Plaintiffs’ Search Terms include many broad terms that could be found in e-mails that have nothing to do with misinformation, such as “election,” “antitrust,” and

² Defendants collected, from those custodians, e-mail correspondence with Social-Media Platform employees who had e-mail addresses with the domain names of @meta.com, @fb.com, @facebook.com, @twitter.com, @instagram.com, @linkedin.com, @youtube.com, @microsoft.com, and @google.com.

“Kennedy.” Defendants also understand this Request to seek only communications between Defendants and third parties outside the government. Further, to the extent this Request seeks any purely internal documents or records, Defendants object to the Request as not proportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery and would be unnecessary in light of the external documents Defendants have agreed to produce. Defendants also object to this Request to the extent it seeks documents protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to the foregoing objection, Defendants will produce non-privileged e-mail communications between Defendants and employees of the Social-Media Platforms concerning Misinformation that can be located within a review population consisting of Custodial Social Media E-mails that contain one or more of Plaintiffs’ Search Terms.

Request 4: Produce organizational charts of any office or group, including HHS leadership, NIAID leadership, CDC leadership, any communications teams, advisory board, working groups, task forces, “analytic exchange,” or other group that has communicated or is communicating with any Social-Media Platform relating to Misinformation and/or Content Modulation.

Response: In addition to the foregoing general objections, Defendants object to this Request as vague because it does not define what constitutes a “communications team,” an “advisory board,” a “working group,” “task force,” or a “group.” Defendants also object to this Request as overbroad because it calls for documents that are not relevant to Plaintiffs’ claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. The organizational charts identified in this Request

would do far more than identify persons who have been “communicating with social-media platforms” about misinformation; *e.g.*, by identifying other persons who simply fall within the same organizational structure.

Request 5: Produce organizational charts of any Social-Media Platform that identify any person(s) You communicate with or have communicated with relating to Misinformation and/or Content Modulation.

Response: In addition to the foregoing general objections, Defendants object to this Request because Defendants do not, in their ordinary course of business, maintain any organizational charts for third party Social-Media Platforms. Accordingly, this Request would not be proportional to the needs of the case, particularly in light of the Court’s order permitting Plaintiffs to seek such information directly from the third parties themselves. Defendants also object to this Request because it calls for documents that are not relevant to Plaintiffs’ claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. The organizational charts identified in this Request would not identify any “federal officials” who have been “communicating with social-media platforms” about misinformation, nor would it describe the contents of those communications.

Request 6: Produce all Documents and Communications relating to any coordination between Social-Media Platform and any “member of our senior staff” and/or “member of our COVID-19 team,” who are “in regular touch with ... social media platforms,” as Jennifer Psaki stated at a White House press briefing on or around July 15, 2021.

Response: In addition to the foregoing general objections, Defendants object to this Request as vague because it relies on a characterization of a statement made by an individual other than Dr. Fauci or

an employee of NIAID, and the statement does not specify the individuals at issue or the specific communications referenced. Defendants further object to this Request as unduly burdensome and not proportional to the needs of the case. This Request calls for *any and all* specified documents from any Defendant or any employee or subordinate of any Defendant. To conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Defendants also object to this Request as overbroad because it calls for documents that are not relevant to Plaintiffs' claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning "the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications." ECF No. 34 at 13. This Request appears to call for communications with Social-Media Platforms regardless of whether they pertain to Misinformation. Further, to the extent this Request seeks any purely internal documents or records, Defendants object to the Request as not proportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery and would be unnecessary in light of the external documents Defendants have agreed to produce. Defendants also object to this Request to the extent it seeks documents protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to the foregoing objection, Defendants will produce non-privileged e-mail communications between Defendants and employees of the Social-Media Platforms concerning Misinformation that can be located within a review population consisting of Custodial Social Media E-mails that contain one or more of Plaintiffs' Search Terms.

Request 7: Produce all Communications with any Social-Media Platform that relating to the “12 people who are producing 65 percent of the anti-vaccine misinformation on social-media platforms,” as Jennifer Psaki stated at a White House press briefing on or around July 15, 2021.

Response: In addition to the foregoing general objections, Defendants object to this Request as vague because it relies on a characterization of a statement made by an individual other than Dr. Fauci or an employee of NIAID, and the statement does not specify the individuals at issue or the specific communications referenced. Defendants further object to this Request as unduly burdensome and not proportional to the needs of the case. This Request calls for *any and all* specified documents from any Defendant or any employee or subordinate of any Defendant. To conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Defendants also understand this Request to seek only communications between Defendants and third parties outside the government. Further, to the extent this Request seeks any purely internal documents or records, Defendants object to the Request as not proportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery and would be unnecessary in light of the external documents Defendants have agreed to produce. Defendants also object to this Request to the extent it seeks documents protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to the foregoing objection, Defendants will produce non-privileged e-mail communications between Defendants and employees of the Social-Media Platforms concerning Misinformation that can be located within a review population consisting of Custodial Social Media E-mails that contain one or more of Plaintiffs’ Search Terms.

Request 8: Produce all Documents and Communications with any Social-Media Platforms that You “engage with ... regularly” relating to “what [Y]our asks are” to such Social-Media Platform(s), as Jennifer Psaki stated at the White House press briefing on or around July 15, 2021.

Response: In addition to the foregoing general objections, Defendants object to this Request as vague because it relies on a characterization of a statement made by an individual other than Dr. Fauci or an employee of NIAID, and the statement does not specify the individuals at issue or the specific communications referenced. Defendants further object to this Request as unduly burdensome and not proportional to the needs of the case. This Request calls for *any and all* specified documents from any Defendant or any employee or subordinate of any Defendant. To conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Defendants also object to this Request as overbroad because it calls for documents that are not relevant to Plaintiffs’ claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. This Request appears to call for communications with Social-Media Platforms regardless of whether they pertain to Misinformation. Defendants also understand this Request to seek only communications between Defendants and third parties outside the government. Further, to the extent this Request seeks any purely internal documents or records, Defendants object to the Request as not proportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery and would be unnecessary in light of the external documents Defendants have agreed to produce. Defendants also object to this Request to the extent it seeks documents protected

by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to the foregoing objection, Defendants will produce non-privileged e-mail communications between Defendants and employees of the Social-Media Platforms concerning Misinformation that can be located within a review population consisting of Custodial Social Media E-mails that contain one or more of Plaintiffs' Search Terms.

Request 9: Produce all Documents and Communications relating to any "government experts" who have "partnered with" Facebook or any Social-Media Platform to address Misinformation and/or Content Modulation.

Response: In addition to the foregoing general objections, Defendants object to this Request as vague because it relies on a characterization of statement made by a third-party outside of government, and the statement does not specify the individuals at issue or the specific communications referenced. Defendants further object to this Request as unduly burdensome and not proportional to the needs of the case. This Request calls for *any and all* specified documents from any Defendant or any employee or subordinate of any Defendant. To conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Defendants also object to this Request as overbroad because it calls for documents that are not relevant to Plaintiffs' claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning "the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications." ECF No. 34 at 13. This Request appears to call for more than direct communications with Social-Media Platforms concerning Misinformation. It appears to also call for purely internal documents that relate to

unspecified “government experts.” Defendants also object to this Request to the extent it seeks documents protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to the foregoing objection, Defendants will produce non-privileged e-mail communications between Defendants and employees of the Social-Media Platforms concerning Misinformation that can be located within a review population consisting of Custodial Social Media E-mails that contain one or more of Plaintiffs’ Search Terms.

Request 10: Produce all Documents and Communications relating to the statement that federal officials “engage[s] regularly with all social media platforms about steps that can be taken” to address Misinformation on social media, which engagement “has continued, and ... will continue,” as Jennifer Psaki stated at the April 25, 2022 White House press briefing.

Response: In addition to the foregoing general objections, Defendants object to this Request as vague because it relies on a characterization of a statement made by an individual other than Dr. Fauci or an employee of NIAID, and the statement does not specify the individuals at issue or the specific communications referenced. Defendants further object to this Request as unduly burdensome and not proportional to the needs of the case. This Request calls for *any and all* specified documents from any Defendant or any employee or subordinate of any Defendant that relate to the specified statement. To conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Defendants also object to this Request as overbroad because it calls for documents that are not relevant to Plaintiffs’ claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on

social media, including the nature and content of those communications.” ECF No. 34 at 13. This Request appears to call for more than direct communications with Social-Media Platforms concerning Misinformation. It appears to also call for purely internal documents that simply “relate” to the specified statement concerning communications with social media platforms. Defendants also object to this Request to the extent it seeks documents protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to the foregoing objection, Defendants will produce non-privileged e-mail communications between Defendants and employees of the Social-Media Platforms concerning Misinformation that can be located within a review population consisting of Custodial Social Media E-mails that contain one or more of Plaintiffs’ Search Terms.

Request 11: Produce all Communications with Mark Zuckerberg from January 1, 2020 to the present, including but not limited to those referenced in Paragraphs 140-144 of the Complaint.

Response: In addition to the foregoing general objections, Defendants object to this Request as overbroad because it calls for documents that are not relevant to Plaintiffs’ claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. This Request calls for all Communications with Mark Zuckerberg, regardless of whether they concern Misinformation. Defendants also understand this Request to seek only communications between Defendants and third parties outside the government. Further, to the extent this Request seeks any purely internal documents or records, Defendants object to the Request as not proportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period

provided for current discovery and would be unnecessary in light of the external documents Defendants have agreed to produce. Defendants also object to this Request to the extent it seeks documents protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to the foregoing objection, Defendants will produce non-privileged e-mail communications between Defendants and employees of the Social-Media Platforms concerning Misinformation that can be located within a review population consisting of Custodial Social Media E-mails that contain one or more of Plaintiffs' Search Terms.

Request 12: Produce all Communications with any Social-Media Platform that relate to the Great Barrington Declaration, the authors of the Great Barrington Declaration, the original signers of the Great Barrington Declaration, Dr. Jay Bhattacharya, Dr. Martin Kulldorff, Dr. Aaron Kheriaty, Dr. Sunetra Gupta, Dr. Scott Atlas, Alex Berenson, Dr. Peter Daszak, Dr. Shi Zhengli, the Wuhan Institute of Virology, EcoHealth Alliance, and/or any member of the so-called "Disinformation Dozen."

Response: In addition to the foregoing general objections, Defendants object to this Request as vague because it does not define what the "Great Barrington Declaration" is or who the "Disinformation Dozen" are. Defendants further object to this Request as unduly burdensome and not proportional to the needs of the case. This Request calls for *any and all* specified documents from any Defendant or any employee or subordinate of any Defendant. To conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Defendants also object to this Request as overbroad because it calls for documents that are not relevant to Plaintiffs' claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning "the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any

ensorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. This Request calls for all Communications with Social-Media Platforms concerning the Great Barrington Declaration, its authors, its original signers, and any member of the “Disinformation Dozen,” regardless of whether those Communications concern Misinformation. Defendants also understand this Request to seek only communications between Defendants and third parties outside the government. Further, to the extent this Request seeks any purely internal documents or records, Defendants object to the Request as not proportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery and would be unnecessary in light of the external documents Defendants have agreed to produce. Defendants also object to this Request to the extent it seeks documents protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to the foregoing objection, Defendants will produce non-privileged e-mail communications between Defendants and employees of the Social-Media Platforms concerning Misinformation that can be located within a review population consisting of Custodial Social Media E-mails that contain one or more of Plaintiffs’ Search Terms.

Request 13: Produce all Communications with any Social-Media Platform involving any member of the White House Communications Team that relate to Misinformation and/or Content Modulation.

Response: In addition to the foregoing general objections, Defendants object to this Request because it seeks documents that are not in the Defendants’ custody or control, namely, all Communications with any Social-Media Platform involving any member of the White House Communications Team, which Plaintiffs define to include “any person with an email domain of @who.eop.gov.” Defendants further object to this Request as unduly burdensome and not proportional to the needs of the case. This Request calls for *any and all* specified documents from any person with an

email domain of @who.eop.gov. Even if all of those documents were in Defendants custody or control, to conduct an exhaustive search to uncover all of those documents, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Defendants also understand this Request to seek only communications between Defendants and third parties outside the government. Further, to the extent this Request seeks any purely internal documents or records, Defendants object to the Request as not proportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery and would be unnecessary in light of the external documents Defendants have agreed to produce. Defendants also object to this Request to the extent it seeks documents protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to the foregoing objection, Defendants will produce non-privileged e-mail communications between Defendants and employees of the Social-Media Platforms concerning Misinformation that can be located within a review population consisting of Custodial Social Media E-mails that contain one or more of Plaintiffs' Search Terms. Defendants will produce e-mail communications that meet the aforementioned criteria even if they involve those with an e-mail domain of @who.eop.gov.

Dated: August 17, 2022

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

ERIC WOMACK
Assistant Director, Federal Programs Branch

/s/ Kuntal Cholera
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Attorneys for Defendants

Sauer, John

From: Cholera, Kuntal (CIV) <Kuntal.Cholera@usdoj.gov>
Sent: Saturday, August 27, 2022 11:02 AM
To: Sauer, John; Snow, Kyla (CIV); 'Murrille@ag.Louisiana.Gov'; Capps, Kenneth; Johnson, Jeff; 'Megan Wold'
Cc: Sur, Indraneel (CIV); Kirschner, Adam (CIV); 'Jenin Younes'; 'Jonathon Burns'; 'John Vecchione'
Subject: RE: 3:22-cv-01213-Missouri et al v. Biden

Hi John,

Thank you for your e-mail. As we mentioned on the yesterday's call, we do not think your belated request for FBI-related discovery is necessary or proper, especially because it is based on purportedly "new" information that has been in the public domain since 2020.

However, we first want to note that, we looked into the Mark Zuckerberg interview you referenced, and we do not think you accurately characterized Zuckerberg's comments. Zuckerberg simply told Rogan: "The background here is that the FBI came to us - some folks on our team - and was like 'hey, just so you know, you should be on high alert. We thought there was a lot of Russian propaganda in the 2016 election, we have it on notice that basically there's about to be some kind of dump that's similar to that.'" <https://www.bbc.com/news/world-us-canada-62688532>. Despite what your e-mail insinuates, it does not appear that Zuckerberg ever told Rogan that the FBI flagged the Hunter Biden story in particular. *See id.* ("[Zuckerberg] said the FBI did not warn Facebook about the Biden story in particular - only that Facebook thought it 'fit that pattern.'"). Nor did Zuckerberg ever appear to suggest that the FBI commanded Facebook to do anything, or—again, as your e-mail insinuates—target only comments beneficial to any one political group.

Furthermore, Zuckerberg's comment, and the FBI follow-up comment that you reference, reveal information that has been public for nearly two years. Zuckerberg made a virtually identical comment at an October 28, 2020 Senate hearing, where he stated: "[W]e've been able to build partnerships across the industry," including "with law enforcement and the intelligence community, to be able to share signals" and "one of the threats that the FBI has alerted our companies and the public to, was the possibility of a hack and leak operation in the days or weeks leading up to this election." <https://www.rev.com/blog/transcripts/tech-ceos-senate-testimony-transcript-october-28>. Zuckerberg went on: "So you had both the public testimony from the FBI and in private meetings alerts that were given to at least our company, I assume the others as well, that suggested that we be on high alert and sensitivity that if a trove of documents appeared that we should view that with suspicion, that it might be part of a foreign manipulation attempt." *Id.* Indeed, later in the hearing, Senator Johnson asked Zuckerberg, who he accused of "censor[ing] New York Post stories": "did . . . you have any evidence that the New York Post story is part of Russian disinformation or that those emails aren't authentic?" *Id.* Zuckerberg replied: "Senator, as I testified before, we relied heavily on the FBI's intelligence and alert to us, both through their public testimony and a private briefing, the alerts they gave us." *Id.* However, Zuckerberg clarified that the FBI did not "specifically" contact Facebook "and say the New York Post story was false." *Id.* Thus, this information has been in the public domain for a while now, and even your Complaint acknowledges that the FBI was in contact with social media platforms. *See also* Compl. ¶ 182 (relying on NBC News article to assert that platforms stated they met with, among other agencies, "the FBI's foreign influence task force")

In any event, your request is inappropriate for a number of other reasons. First, it falls outside the scope of the Judge's order authorizing expedited discovery. The Judge ordered discovery on who, at the time of his order, constituted the "Government Defendants"—which did not, and still does not, include the DOJ/FBI—and he required Plaintiffs to submit their "document requests" within "five business days after his ruling" (thus, by July 19, 2022). ECF No. 34. The Court's order did not authorize the service of new discovery requests after July 19, 2022.

Second, Plaintiffs' request is incompatible with the expedited schedule that Plaintiffs' insisted upon, and the Court ordered. The current schedule does not allow for a process whereby Plaintiffs can submit discovery requests in a rolling manner as they uncover new information that they find concerning. It is unclear how we could comply with your new discovery requests without drastically extending the discovery schedule. But Plaintiffs have made clear that they will resist extending the schedule beyond the additional time we have built in for supplemental interrogatory responses, and Plaintiffs have repeatedly stated that they believe they need emergency relief now.

Third, as we mentioned during the last meet-and-confer, this was supposed to be a narrow, expedited discovery process, where Plaintiffs would seek evidence that they believe is *necessary* for their pending preliminary injunction motion. Plaintiffs, however, appeared unwilling to state that they do not believe they can prevail on their motion without additional evidence. If Plaintiffs believe they have the evidence they need, the parties should now do what Plaintiffs insisted upon: litigate the preliminary injunction motion and receive a decision. That would at least give us a decision on a question at the heart of the parties' dispute: whether the types of communications at issue here, as a matter of law, amount to a First Amendment violation. And although you mention that Plaintiffs need discovery to settle on the scope of relief they will request, there has to be some fixed end-date. If we have to wait for Plaintiffs to conduct an investigation into every corner of the federal government, it is unclear how we can proceed on the schedule Plaintiffs demanded.

Finally, we want to note that if Plaintiffs are going to seek additional discovery, we may also seek discovery from Plaintiffs. In particular, we may request all misinformation-related communications between officials of the Plaintiff States and Facebook, Twitter, Instagram, YouTube, and LinkedIn. Our document review has revealed that multiple State government officials—of different political stripes—have sought to remove misinformation from social media platforms. A public search has indicated that this may even have included a former Missouri state government official. See <https://www.news-leader.com/story/news/politics/2021/09/14/missouris-health-director-plans-state-covid-response-fight-misinformation-masks-vaccination/8332397002/>. Of course, we do not suggest that we necessarily find those communications to be problematic. However, it would be telling if State officials from Missouri and Louisiana were aware of, and attempted to limit, the harms of misinformation.

Happy to discuss further.

Thank you,
Kuntal

From: Sauer, John <John.Sauer@ago.mo.gov>

Sent: Saturday, August 27, 2022 6:18 AM

To: Snow, Kyla (CIV) <Kyla.Snow@usdoj.gov>; Cholera, Kuntal (CIV) <Kuntal.Cholera@usdoj.gov>;

'Murrille@ag.Louisiana.Gov' <murrille@ag.louisiana.gov>; Capps, Kenneth <Kenneth.Capps@ago.mo.gov>; Johnson, Jeff <Jeff.Johnson@ago.mo.gov>; 'Megan Wold' <mwold@cooperkirk.com>

Cc: Sur, Indraneel (CIV) <Indraneel.Sur@usdoj.gov>; Kirschner, Adam (CIV) <Adam.Kirschner@usdoj.gov>; 'Jenin Younes' <jenin.younes@ncla.legal>; 'Jonathon Burns' <john@burns-law-firm.com>; 'John Vecchione' <john.vecchione@ncla.legal>

Subject: [EXTERNAL] RE: 3:22-cv-01213-Missouri et al v. Biden

Dear Counsel-

As a follow-up note to my request for FBI communications with social-media companies about misinformation, disinformation, malinformation, and censorship and suppression of speech on social media, the FBI has now made a public statement in response to Mark Zuckerberg indicating that a significant volume of such communications exist:

“The FBI *routinely* notifies U.S. private sector entities, including social media providers, of *potential threat information*, so that they can decide how to better defend against threats,” the [FBI] stated. See <https://www.nbcnews.com/politics/politics-news/fbi-responds-mark-zuckerberg-claims-joe-rogan-show-rcna45082> (emphases added).

To an ordinary English speaker, “potential threat information” from foreign agents would seem to refer to hackers, fraudsters, and similar criminal infiltrators, not content from the New York Post that constitutes core political speech lying at the heartland of the First Amendment, yet deemed to be “disinformation” by government agents based on undisclosed standards of censorship. But the FBI obviously meant the latter here. In context of Mr. Zuckerberg’s comments, the FBI’s statement reveals that its reference to “potential threat information” includes – and has included since at least 2020 – information calling for the censorship of so-called “disinformation,” which is the very subject of our disputes. In other words, the FBI’s communications about “potential threat information” obviously include communications about “misinformation, disinformation, malinformation, and/or any censorship or suppression of speech on social media,” as stated in the Court’s order.

And the FBI’s statement indicates that it issues such communications to social-media companies “*routinely*,” and has been doing so since at least 2020 when the communication happened. As I emphasized in yesterday’s call, this is critically relevant information to our case which we had no opportunity to request when we served our document requests because *the Government had concealed it from the public*. That is why Mr. Zuckerberg’s statements on Joe Rogan’s podcast are being described as a “bombshell.” We request the production of these communications – including but not limited to the communications with Meta whose existence Mr. Zuckerberg has broadcast to the entire world.

Thanks, John

From: Sauer, John
Sent: Friday, August 26, 2022 4:49 PM
To: 'Snow, Kyla (CIV)' <Kyla.Snow@usdoj.gov>; 'Cholera, Kuntal (CIV)' <Kuntal.Cholera@usdoj.gov>; 'Murrille@ag.Louisiana.Gov' <murrille@ag.louisiana.gov>; Capps, Kenneth <Kenneth.Capps@ago.mo.gov>; Johnson, Jeff <Jeff.Johnson@ago.mo.gov>; 'Megan Wold' <mwold@cooperkirk.com>
Cc: 'Sur, Indraneel (CIV)' <Indraneel.Sur@usdoj.gov>; 'Kirschner, Adam (CIV)' <Adam.Kirschner@usdoj.gov>; 'Jenin Younes' <jenin.younes@ncla.legal>; 'Jonathon Burns' <john@burns-law-firm.com>; 'John Vecchione' <john.vecchione@ncla.legal>
Subject: RE: 3:22-cv-01213-Missouri et al v. Biden

Dear Counsel-

Thank you for participating in this afternoon’s meet-and-confer, which we believe was productive. We appreciate the parties’ hard work to reach agreement on disputed issues. As I did on Wednesday, attached is a brief identification of issues discussed with status/action items based on our discussion. Again, this is not intended to report on all issues discussed in the one-hour meeting, but just to identify the status and future actions on each issue:

- (1) Clawback agreement. I stated that we are close to agreement and we will return any comments to Kyla's latest redline.
- (2) Discovery from WH/EOP officials. Adam and I discussed at some length. Adam indicated that Defendants do not agree to any discovery from WH/EOP officials, including Karine Jean-Pierre and Dr. Fauci in his capacity as Chief Medical Advisor to the President. I stated that we are unlikely to take the issue off the table. Both sides agreed to leave the door open to further discussions if the other side comes up with an additional proposal, but for now, we agree to disagree.
- (3) More specific interrogatory responses to the two DHS interrogatories and the two Dr. Fauci interrogatories flagged in my email of yesterday. You agreed to supplement these interrogatory responses and propose a deadline of two weeks after the submission of the joint statement. I stated that we would agree to that. (To be clear, we are asking for interrogatory responses that reflect Dr. Fauci's "human knowledge," in addition to NIAID searching its ESI.)
- (4) Interrogatory responses identifying officials at other federal agencies outside DHS, NIAID, CDC, CISA, etc. Indraneel stated that you will inquire of the "human knowledge" of key custodians whether they are able and willing to identify such officials at other federal agencies. He stated that there may be timing difficulties because some have left the employment of the federal government. I suggested they might be put on the same timetable as the responses in (3). Indraneel will send us an email with a specific proposal.
- (5) Definition of "Social-Media Platform." Kuntal represented the reviewers are not removing communications from Google custodians that relate to Google's search engine, as opposed to YouTube content. We agreed to treat this issue as resolved.
- (6) Org charts. Kuntal represented that you have identified these and are planning to produce them. The issue is resolved.
- (7) Metadata. Kuntal indicated that you are working on and will produce the .dat file promptly, which should resolve this issue.
- (8) Privilege log. You stated that blank documents will be replaced with slipsheets in the updated production. You stated that there appear to be four privileges: (1-2) Law enforcement and national-security privileges that result only in redaction of officers' names. You are addressing these by redacting the names and replacing them with monikers like "FBI #5," etc. We agreed that there is no need to log those redactions separately. (3) Deliberative process privilege. You stated that you have reduced this to 65 documents, which are being re-reviewed by CISA, which may result in some or all being produced. We agreed to discuss this issue later if it becomes necessary. (4) Proprietary information privilege. You provided some specific examples of such information, such as information from the Center for Internet Security and social-media platforms. You proposed dealing with these documents by seeking third-party consent and/or producing them under a protective order. I stated that our team would discuss these proposals and get back to you.
- (9) Alternative channels of communication, such as text messages, private emails and devices, etc. Kyla stated that you are using best efforts to search for such communications. She stated that a few text messages have been identified and will be produced. (It looks like Kyla has emailed those to us while I was drafting this email.) You will supplement your response if your due diligence discovers additional documents.
- (10) Fauci-Zuckerberg emails. Kuntal stated that the additional emails withheld as non-responsive will be produced. He stated that to your knowledge Dr. Fauci did not use alternative devices to communicate.
- (11) Regarding the issues raised in my email of earlier today, I renewed my request for you to respond to interrogatories asking Defendants to identify federal officials at other agencies, such as the FBI, who are or have engaged in communications with social-media platforms about misinformation, disinformation, malinformation, and/or censorship or suppression of speech on social media. WE agreed that this request falls under (4), above, and that Indraneel will follow up with an email about this issue.
- (12) Regarding our request for communications from other federal officials we have now identified – such as the FBI's communications with social-media platforms about disinformation, the communications of Census Bureau officials, and Treasury and State Department officials – you object to producing communications from them on the ground that they were not served with discovery requests. I responded that we had no opportunity to do so because their identities were concealed. We do not have agreement on this issue.

I also flagged that we may send lists of new custodians that we receive from social-media platforms with requests for their documents over the weekend or early next week. If and when we receive them, we will forward them to you asap.

Thanks, John

From: Sauer, John

Sent: Friday, August 26, 2022 9:34 AM

To: 'Snow, Kyla (CIV)' <Kyla.Snow@usdoj.gov>; 'Cholera, Kuntal (CIV)' <Kuntal.Cholera@usdoj.gov>; 'Murrille@ag.Louisiana.Gov' <murrille@ag.louisiana.gov>; Capps, Kenneth <Kenneth.Capps@ago.mo.gov>; Johnson, Jeff <Jeff.Johnson@ago.mo.gov>; 'Megan Wold' <mwold@cooperkirk.com>

Cc: 'Sur, Indraneel (CIV)' <Indraneel.Sur@usdoj.gov>; 'Kirschner, Adam (CIV)' <Adam.Kirschner@usdoj.gov>; 'Jenin Younes' <jenin.younes@ncla.legal>; 'Jonathon Burns' <john@burns-law-firm.com>; 'John Vecchione' <john.vecchione@ncla.legal>

Subject: RE: 3:22-cv-01213-Missouri et al v. Biden

Dear Counsel-

In light of our ongoing review of documents and some additional revelations, we are raising the following issues for discussion at today's meet-and-confer. Several of these issue directly relate to Item (5) from my email of Wednesday, requesting responses to our discovery requests that identify federal officials and communications outside DHS and HHS who are communicating with social-media platforms about misinformation, disinformation, and censorship.

- (1) **FBI/DOJ Custodians** – Yesterday, Mark Zuckerberg stated on Joe Rogan's podcast that a "disinformation" communication from the FBI is what led to Facebook's censorship of the Hunter Biden laptop story (an incident which is referenced at great length in our pleadings, and referenced again in *the Court's order compelling discovery*). This stunning revelation – brand-new to us – goes to the heart of what I have been emphasizing again and again – we are requesting the identities and communications of federal officials *about whom we do not yet know* – including at *agencies outside DHS and HHS* – who are communicating about misinformation, disinformation, and censorship with social-media platforms. Indeed, as we emphasized in our motion for PI-related discovery, discovering the identities of such officials is essential to crafting effective injunctive relief, and it was central to the reasons we moved for PI-related discovery in the first place. We respectfully request that you identify relevant FBI/DOJ custodians who are or have been engaged in such communications – just as you have done for CDC, CISA, NIAID, and others – and search their ESI for relevant communications. We note that this information is undoubtedly within the knowledge of the DGB and other DHS officials, and thus directly responsive to our discovery requests. (Based on the preview of today's upcoming production that Kyla shared, we realize that this may be addressed, in whole or in part, in the documents we are expecting to receive sometime today, but we are flagging it now for further discussion.)
- (2) **Census Bureau Custodians** – Our document review so far confirms what we alleged in our First Amended Complaint, i.e., that Census Bureau custodians like Jennifer Shopkorn, and Census contactors like Christopher Lewitzke, among others, are repeatedly engaged in relevant communications about misinformation, disinformation, and censorship with social-media platforms. Further, YouTube has confirmed for us that certain Census Bureau officials were given "trusted flagger" status by YouTube to allow them special status in reporting so-called "misinformation" and "disinformation" on YouTube for censorship. We request that you identify the full set of relevant Census Bureau custodians with knowledge and produce their communications, including but not limited to their communications related to and reflecting their "trusted flagger" status. Again, such information about the identities and nature and content of communications by Census Bureau officials is clearly within the knowledge of CDC custodians (like Carol Crawford, who talks about their knowledge and experience in emails), and thus it is directly responsive to our discovery requests.
- (3) **Federal Officials Communicating with YouTube** – We anticipate obtaining from YouTube by tomorrow a list of federal officials who communicated with YouTube custodians about misinformation, disinformation, and

ensorship. When we receive it, we will forward it to you with the request that you immediately search for and produce responsive communications from any such federal officials from whom you have not already identified and produced relevant communications.

- (4) **Department of Treasury and State Department Custodians** – We have now seen emails reflecting relevant communications from these two agencies as well. We request that you identify custodians from these agencies in response to our discovery requests, and we request that you search for relevant communications.

We will continue to raise issues as we review your ongoing production.

Thanks, John

From: Sauer, John

Sent: Thursday, August 25, 2022 3:08 PM

To: 'Snow, Kyla (CIV)' <Kyla.Snow@usdoj.gov>; 'Cholera, Kuntal (CIV)' <Kuntal.Cholera@usdoj.gov>; 'Murrille@ag.Louisiana.Gov' <murrille@ag.louisiana.gov>; Capps, Kenneth <Kenneth.Capps@ago.mo.gov>; Johnson, Jeff <Jeff.Johnson@ago.mo.gov>; 'Megan Wold' <mwold@cooperkirk.com>; 'Brian Barnes' <BBarnes@cooperkirk.com>; Scott, Todd <Todd.Scott@ago.mo.gov>

Cc: 'Sur, Indraneel (CIV)' <Indraneel.Sur@usdoj.gov>; 'Kirschner, Adam (CIV)' <Adam.Kirschner@usdoj.gov>; 'Jenin Younes' <jenin.younes@ncla.legal>; 'Jonathon Burns' <john@burns-law-firm.com>; 'John Vecchione' <john.vecchione@ncla.legal>

Subject: RE: 3:22-cv-01213-Missouri et al v. Biden

Dear Counsel-

This email is to follow-up on Item (7) from my email of yesterday, and Items (4) and (9) from my original email of Monday, relating to the vague, uninformative nature of many interrogatory responses. (This email does not address other interrogatory-related issues that remain the subject to separate discussion.) We request comprehensive, specific interrogatory responses, and we note the obligation to identify with specificity the nature of content of relevant oral communications (such as phone calls, Zoom meetings, face-to-face meetings, etc.) in interrogatory responses. You stated that you have only searched government email accounts for responsive documents. Interrogatories provide an essential method of identifying alternative methods of communication, such as oral communications (e.g., phone, Zoom, face-to-face, etc.) and alternative channels of written communication (e.g. text messages, private email accounts, “misinfo reporting channels,” etc.). It is not unduly burdensome to ask key custodians to review their calendars, search their memories, and use other reasonable methods to identify relevant oral and written communications other than their government email accounts, and identify and describe them in interrogatory responses. In the interest of narrowing disputes, we will leave our disputes on the table for many of your interrogatory responses, but we request comprehensive and specific responses to the following four interrogatories:

DHS No. 9: This interrogatory asks DHS to identify all “tech companies” with which DHS is “working together to prevent harm from occurring” through the spread of misinformation and/or disinformation (directly quoting Sec. Mayorkas’s August 2, 2021, statement), and to describe the nature of the work and the nature of the communications with the “tech companies.” Respectfully, DHS has offered a non-response that essentially quotes from a “Fact Sheet” on DHS’s website (<https://www.dhs.gov/news/2022/05/02/fact-sheet-dhs-internal-working-group-protects-free-speech-other-fundamental-rights>), which non-response states: “Consistent with the Department’s mission to protect the homeland, DHS responds to Misinformation that poses a threat to the homeland. It identifies Misinformation that poses a threat to the homeland through publicly available sources, research conducted by academic and other institutions, and information shared by other federal agencies and partners. DHS then shares factual information related to its mission and about which it has expertise to potentially impacted people and organizations.” This response is completely vague and non-responsive. It does not identify any “tech companies,” and it does not “describe the nature of the work” or the “Communications relating to such work.” Please provide a complete response to the interrogatory that provides comprehensive and particular information. (This is particularly important because, in order to narrow issues of dispute

in good faith, we have withdrawn our objection to your restriction of search terms to include only Facebook, Twitter, YouTube, LinkedIn, and Instagram.)

DHS No. 13: This interrogatory asks DHS to identify all federal agencies, sub-agencies, employees, and officials, “both within and without DHS,” that communicate with any Social-Media Platform regarding Misinformation and/or Content Modulation. DHS’s response states that “personnel from within” four DHS Offices “have communicated with Social-Media Platforms regarding Misinformation.” It does not identify who those “personnel” are – it is not clear to what extent they overlap with the custodians identified in response to Rog 1 – and it does not describe “the nature of their coordination with the Social-Media Platform(s).” Further, it does not identify any federal agencies, officers, or employees “without DHS” who engage in such communications. As noted in the first pages of our PI motion, the DGB whistleblower documents indicate that the DGB was designed to oversee such communications “across the federal enterprise” (in Sec. Mayorkas’s words). DHS is evidently aware of federal agencies and officials *other than DHS’s own officials* who are engaged in Communications with Social-Media Platforms about Misinformation and Content Modulation, and we request that they be identified. In short, we request a full response to DHS Rog. 13.

Dr. Fauci No. 8: This interrogatory asks Dr. Fauci to identify his communications with Mark Zuckerberg. Your response simply refers to the emails with Mr. Zuckerberg that you have produced (some of which Kuntal advised us have been withheld, and which we are separately requesting). Based on our conversation yesterday, we understand that there has been no separate effort to inquire of Dr. Fauci whether he is aware of any other (non-email) communications, whether oral or written. We request that Dr. Fauci make good-faith and comprehensive efforts to identify all oral communications with Mark Zuckerberg, and all other communications via channels other than his government email, for the relevant time period, and provide a reasonably particular description of the nature and content of such communications. If they are written communications, we further request that they be produced. We request a complete response to this interrogatory.

Dr. Fauci No. 9: The same issue applies to this Interrogatory response, which again simply refers to the results of your email search. Again, we understand that there has been no effort to inquire of Dr. Fauci about his knowledge of other communications on these topics, whether oral or through alternative written communications. We request a similar good-faith effort by Dr. Fauci to identify and describe oral communications with any Social-Media Platforms on the identified topics in response to this interrogatory, and to identify and produce any written communications through non-government-email channels. In short, we request a complete response to this interrogatory.

(We have separate concerns about the response to Dr. Fauci No. 10, and all the Karine Jean-Pierre interrogatories, which we raised in issue (1) below.)

In addition, we request that you re-issue your Interrogatory responses without the “Confidential” stamp. We do not see any basis to treat them as confidential, and they were not included in our agreement about redactions. As I noted yesterday, they are likely to be filed as an Exhibit to any joint statement. If you have specific concerns about any content you wish to redact, please let us know promptly.

Thanks, John

From: Sauer, John

Sent: Wednesday, August 24, 2022 5:00 PM

To: 'Snow, Kyla (CIV)' <Kyla.Snow@usdoj.gov>; Cholera, Kuntal (CIV) <Kuntal.Cholera@usdoj.gov>; Murrille@ag.Louisiana.Gov; Capps, Kenneth <Kenneth.Capps@ago.mo.gov>; Johnson, Jeff <Jeff.Johnson@ago.mo.gov>; 'Megan Wold' <mwold@cooperkirk.com>; Brian Barnes <BBarnes@cooperkirk.com>; Scott, Todd <Todd.Scott@ago.mo.gov>

Cc: Sur, Indraneel (CIV) <Indraneel.Sur@usdoj.gov>; Kirschner, Adam (CIV) <Adam.Kirschner@usdoj.gov>; Jenin Younes <jenin.younes@ncla.legal>; Jonathon Burns <john@burns-law-firm.com>; John Vecchione <john.vecchione@ncla.legal>

Subject: RE: 3:22-cv-01213-Missouri et al v. Biden

Dear Counsel-

Thank you for meeting and conferring with us just now for over two hours to discuss disputed issues regarding discovery. We appreciate everyone's efforts to reach agreement, and we believe it was a productive call. This email is to summarize the follow-up and action items for both sides that we discussed on the call; it is not intended to recount the entirety of the lengthy conversation. I will attempt to go through the items we discussed in the order they were discussed.

- (1) Regarding your request to modify our prior agreement on redactions of contact information to add redactions of the names of lower level employees, we discussed the issue at some length. You plan to ask your clients for a specific list of names to be redacted or another manner of identifying who would be redacted, and we will consider that proposal when you provide it to us. In the meantime, for documents that we plan to file with the Court or otherwise publicly disclose, we will redact contact information from them per our agreement, and consult with you about whether you wish for additional redactions.
- (2) Clawback agreement. We will provide a redline to Kyla's proposed agreement.
- (3) Timing of the parties' portions of the proposed joint statement. Kyla proposed that we provide a draft by tomorrow. We do not agree that, and instead proposed a simultaneous exchange of drafts at an agreed time. You plan to consult with your team and respond with a proposal.
- (4) Discovery from Karine Jean-Pierre and other White House officials. Adam proposed responding only to Interrogatory No. 6 to Karine Jean-Pierre. We suggested that there should be a response that (1) identifies the federal officials of whom they are aware who have or are communicating with social-media platforms about misinformation and content modulation on social-media, and (2) describes the nature and content of those communications. This would encompass the information sought in Rogs 1 and 2. Adam plans to discuss with his client and get back to us with a possible proposal.
- (5) Identifying federal officials and agencies engaged in relevant communications with social-media platforms, outside the responding agencies. Your interrogatory responses do not provide this information. We ask that you identify these in response to interrogatories. We noted that, as Kuntal said, you have identified key custodians using human knowledge, and those custodians know whether other federal officials and agencies are involved in such communications. (The documents already produced reflect involvement of Department of Treasury and Census Bureau officials, for example.) This is an important issue for us that we emphasized in requesting expedited PI-related discovery in the first place. Indraneel plans to discuss with his clients and let us know if they are willing to expand their Rog responses to include this information.
- (6) Kuntal identified that your search methodology was to identify key custodians within the relevant agencies and use our "Search Terms" on their inboxes, and then engage in a responsiveness and privilege review. Based on this representation, I agreed to take off the table our dispute with your objection to the definitions of Misinformation and Content Modulation, and our concern about what search terms you used.
- (7) We objected that certain interrogatory responses from DHS and CISA (4, 6, 7, 9, 13, and 14 from DHS; Jankowicz 9, and Easterly 4, 8, 10) are too vague to be useful. Indraneel indicated, but did not know for sure, that the document production may have provided more information about the meetings. We noted that we too are still in the process of reviewing the production. We agreed to follow up with a more detailed identification and explanation of our concerns about the specific responses for you to take to your clients.
- (8) Alternative avenues of communication, such as text messages, private email accounts and private devices, and misinfo "reporting channels" provided by social-media platforms. Kyla indicate that you will consult with your clients before providing your position on these requests.
- (9) Regarding your narrowed definition of "Social-Media Platform," I asked whether your search criteria would capture communications with Google about Google search results. You indicated that you would check with your review team about this, and I stated that, if so, we might be willing to take this issue off the table.
- (10) Privilege log. You indicated that you do not plan to produce a privilege log before the joint statement is due on Monday. We asked you to provide as much detail as possible about your claims of privilege by Friday, and we asked you to identify the breadth, scope, and nature of privilege assertion for any documents that have been

withheld on privilege grounds. Kuntal agreed to determine and let us know whether documents were withheld in this fashion.

- (11)HHS's designation of three sub-offices (OSG, NIAID, and CDC) as sub-units likely in possession of responsive information. We agreed to consult with our team and let you know if we have further concerns about this point.
- (12)Org charts. Kuntal agreed to follow up and see if your clients are willing and able to produce org charts in response to RFPs 4 and 5.
- (13)Communications with Twitter regarding the planned meeting with DHS, Nick Pickles, and Yoel Roth. You think the search terms likely addressed this issue, but agreed to inquire further of your client about such communications.
- (14)Dr. Fauci's communications with Mark Zuckerberg. Kuntal indicated that some communications between these two have been withheld as non-responsive. We indicated that they are responsive to RFP 14 to Dr. Fauci and they provide context for the email communications alleged in detail in the Complaint and First Amended Complaint. Kuntal agreed to follow up with your clients and let us know if you are willing to produce them.
- (15)Emails without attachments/Metadata. Jeff Johnson will follow up in a separate email to you about these issues.

Thanks, John

From: Snow, Kyla (CIV) <Kyla.Snow@usdoj.gov>

Sent: Wednesday, August 24, 2022 11:36 AM

To: Sauer, John <John.Sauer@ago.mo.gov>; Cholera, Kuntal (CIV) <Kuntal.Cholera@usdoj.gov>; Murrille@ag.Louisiana.Gov; Capps, Kenneth <Kenneth.Capps@ago.mo.gov>; Johnson, Jeff <Jeff.Johnson@ago.mo.gov>; 'Megan Wold' <mwold@cooperkirk.com>; Brian Barnes <BBarnes@cooperkirk.com>; Scott, Todd <Todd.Scott@ago.mo.gov>

Cc: Sur, Indraneel (CIV) <Indraneel.Sur@usdoj.gov>; Kirschner, Adam (CIV) <Adam.Kirschner@usdoj.gov>; Jenin Younes <jenin.younes@ncla.legal>; Jonathon Burns <john@burns-law-firm.com>; John Vecchione <john.vecchione@ncla.legal>

Subject: RE: 3:22-cv-01213-Missouri et al v. Biden

John,

To follow up on your question about remaining productions, we are hoping to produce roughly 550 additional documents by the end of this week. These would complete our production of confidential documents in response to Plaintiffs' discovery requests.

As we previewed in an earlier email, the remaining documents required additional review for potential law enforcement sensitivities. A portion of these documents will contain a handful of privilege redactions to low-level FBI, NSA, or ODNI employee names under the law enforcement privilege or a National Security Act provision exempting from disclosure the names of certain personnel. The redactions will still allow Plaintiffs to see that the person identified is associated with a specific agency. We are endeavoring to complete review and any necessary redactions as quickly as possible. So you can see what the documents with those redactions applied will look like ahead of their production, I'm attaching one exemplar that would be part of the next production.

As you'll see, the redactions are minimal, but we wanted to flag this now in advance of our meet and confer since we will not be able to produce the documents until hopefully the end of this week. We can discuss the production of a privilege log for these and other redactions and withholdings at the meet and confer today.

Best,
Kyla

From: Sauer, John <John.Sauer@ago.mo.gov>

Sent: Tuesday, August 23, 2022 1:21 PM

To: Snow, Kyla (CIV) <Kyla.Snow@usdoj.gov>; Cholera, Kuntal (CIV) <Kuntal.Cholera@usdoj.gov>; Murrille@ag.Louisiana.Gov; Capps, Kenneth <Kenneth.Capps@ago.mo.gov>; Johnson, Jeff <Jeff.Johnson@ago.mo.gov>; 'Megan Wold' <mwold@cooperkirk.com>; Brian Barnes <BBarnes@cooperkirk.com>; Scott, Todd <Todd.Scott@ago.mo.gov>
Cc: Sur, Indraneel (CIV) <Indraneel.Sur@usdoj.gov>; Kirschner, Adam (CIV) <Adam.Kirschner@usdoj.gov>; Jenin Younes <jenin.younes@ncla.legal>; Jonathon Burns <john@burns-law-firm.com>; John Vecchione <john.vecchione@ncla.legal>
Subject: [EXTERNAL] RE: 3:22-cv-01213-Missouri et al v. Biden

Kyla-

Sounds good, how about meeting and conferring at 3:00 pm Eastern/2:00 pm Central tomorrow? As I stated yesterday, we agree to meet and confer about the clawback agreement and the issue of name redactions, along with the other 17 issues noted in my email of yesterday. In the meantime, it would be helpful for us to know what is the anticipated volume of documents remaining to be produced, and the anticipated schedule of production, if you can provide that information.

Thanks, John

From: Snow, Kyla (CIV) <Kyla.Snow@usdoj.gov>
Sent: Tuesday, August 23, 2022 12:12 PM
To: Sauer, John <John.Sauer@ago.mo.gov>; Cholera, Kuntal (CIV) <Kuntal.Cholera@usdoj.gov>; Murrille@ag.Louisiana.Gov; Capps, Kenneth <Kenneth.Capps@ago.mo.gov>; Johnson, Jeff <Jeff.Johnson@ago.mo.gov>; 'Megan Wold' <mwold@cooperkirk.com>; Brian Barnes <BBarnes@cooperkirk.com>; Scott, Todd <Todd.Scott@ago.mo.gov>
Cc: Sur, Indraneel (CIV) <Indraneel.Sur@usdoj.gov>; Kirschner, Adam (CIV) <Adam.Kirschner@usdoj.gov>; Jenin Younes <jenin.younes@ncla.legal>; Jonathon Burns <john@burns-law-firm.com>; John Vecchione <john.vecchione@ncla.legal>
Subject: RE: 3:22-cv-01213-Missouri et al v. Biden

John,

We are available for an initial meet and confer any time tomorrow afternoon except for 2-2:30, and we will be available on other days to continue the conversation as necessary.

As noted at the end of your email, the issue of name redactions and a clawback agreement are outstanding. In our view, those items are essential and should be prioritized in our discussions about all other issues raised below.

Best,
Kyla

From: Sauer, John <John.Sauer@ago.mo.gov>
Sent: Monday, August 22, 2022 5:59 PM
To: Cholera, Kuntal (CIV) <Kuntal.Cholera@usdoj.gov>; Murrille@ag.Louisiana.Gov; Capps, Kenneth <Kenneth.Capps@ago.mo.gov>; Johnson, Jeff <Jeff.Johnson@ago.mo.gov>; 'Megan Wold' <mwold@cooperkirk.com>; Brian Barnes <BBarnes@cooperkirk.com>; Scott, Todd <Todd.Scott@ago.mo.gov>
Cc: Snow, Kyla (CIV) <Kyla.Snow@usdoj.gov>; Sur, Indraneel (CIV) <Indraneel.Sur@usdoj.gov>; Kirschner, Adam (CIV) <Adam.Kirschner@usdoj.gov>; Jenin Younes <jenin.younes@ncla.legal>; Jonathon Burns <john@burns-law-firm.com>; John Vecchione <john.vecchione@ncla.legal>
Subject: [EXTERNAL] RE: 3:22-cv-01213-Missouri et al v. Biden

Dear Counsel-

We have identified a number of issues in your responses and production so far that warrant prompt discussion by the parties. We are raising these issues (listed below) in good faith, summarizing our understanding of your position and our objections to it, for the purposes of advancing our discussions. We understand that your production is still ongoing, so if we have misunderstood your position on any issue, please let us know. We request the opportunity to meet and confer about these issues as soon as possible, and we propose having a conference no later than Wednesday. Given that your production is ongoing through Thursday, we will probably need to have follow-up discussions on Friday and/or Monday as well.

- (1) In response to both interrogatories and document requests, you categorically object to producing any information, documents, or communications from any officials in the White House and/or the Executive Office of the President. It appears from your discovery responses that you have not searched for any responsive emails or documents from any WH and/or EOP sources, and you have categorically objected without responding to all interrogatories directed to WH/EOP officials, such as Karine Jean-Pierre and Dr. Fauci. You object on grounds of privilege, but communications between White House officials and third-parties like the Social-Media Platforms are not privileged. You claim that we are required to seek that information from other sources first, but among other problems, that is not a practicable solution in expedited preliminary-injunction related discovery. We have strong reason to believe that there is significant involvement of WH/EOP officials in relevant communications, as many sources confirm their involvement – including Jen Psaki’s open admissions, the Twitter Slack messages that Alex Berenson released, and the cc’ing of EOP officials on the emails you have produced, among others-- and thus your position denies us discovery on matters of the highest relevance and importance. We strongly disagree with your position on this point, which appears wholly unwarranted, and we request that you respond to interrogatories and produce responsive documents and communications immediately.

- (2) Your responses to Interrogatory 1 (what you call Common Interrogatory 1) fail to provide information about the identities of federal officials and/or agencies *other than the responding agencies* that are communicating with social-media platforms about content modulation and misinformation. Given the parties’ pre-production negotiation and agreement on this very issue, this position is surprising and unsupportable. The parties extensively negotiated a compromise in response to Indraneel’s objection to the number of interrogatories. Over our repeated objection, Indraneel insisted on treating the first five interrogatories as “Common” interrogatories, and selecting a single “Common” interrogatory as Number 1. He proposed the first interrogatory to HHS as Common Rog No. 1. In my email of Thursday, August 11, I specifically objected to using the HHS version of Rog 1 as the “Common” Rog 1 for all Defendants, precisely because it did not ask for each Defendant to identify any and all federal officials and agencies who communicate with Social-Media Platforms about Content Modulation and Censorship *outside* the responding agency. In that Aug. 11 email, I specifically noted that, “in several of the Interrogatory 1s sent to certain defendants, we deliberately asked the recipient to identify, not just employees of their own agency, but to identify all employees or agents of *any* federal agency of which they are aware who communicate with social-media platforms about Content Modulation and/or Misinformation.” (Emphasis in original.) For this reason, I insisted that, if the parties were to reach agreement on the number-of-interrogatories objection, that each Defendant must respond to a modified version of CDC Rog 1, not HHS Rog 1, because the CDC version specifically asked about *other* federal agencies and officials who communicate with Social-Media Platforms about Content Modulation and Misinformation: ““Identify every officer, official, employee, staff member, personnel, contractor, or agent of [the responding Defendant and/or his or her federal agency] ***or any other federal official or agency*** who has communicated or is communicating with any Social-Media Platform regarding Content Modulation and/or Misinformation.” By his response email of Thursday, August 11, 2022, at 12:20 pm Central, Indraneel explicitly agreed to this request: “Defendants will respond subject to objections to the 5 common, plus 20, interrogatories ***you have identified in this morning’s e-mail***” (i.e. my email of earlier that morning, insisting that the CDC Rog 1 be used for all Defendants). Then, to ensure there was no confusion on this very issue, I sent a follow-up email on the morning of Friday, August 12, at 7:15 am Central which stated: “We understand that you are agreeing to have each Defendant respond, along with the others discussed, to the modified version of Interrogatory 1 to the CDC, as set forth in my email of yesterday and immediately below, but please let me know if we are mistaken,” and then I quoted the modified

CDC Rog 1. No one on your side noted any disagreement on this point, then or later. Despite this clear and explicit agreement, your Interrogatory responses simply do not provide this information about what other federal agencies and officials are communicating with Social-Media Platforms about Content Modulation and Misinformation. This is particularly surprising and disappointing because we know such agencies exist, and we know that at least some Defendants know about them – for example, the CDC emails identify Census Bureau and Department of Commerce officials engaged in such communications, but your interrogatory responses do not mention them. Your position on this is inconsistent with our clear and explicit agreement and insupportable under the law in any event. Please immediately supplement your interrogatory responses with the requested information.

- (3) Your objections indicate that you are only searching for communications about Misinformation, and not Content Modulation. See, e.g., Interrogatory Responses at 2, 21. This position is inconsistent with the plain terms of the Court’s order, which authorizes discovery of “communicat[i]ons] with social-media platforms about disinformation, misinformation, malinformation, **and/or** any censorship or suppression of speech on social media, including the nature and content of those communications.” Doc. 34, at 13. To be clear, a Communication from a federal official to a Social-Media Platform that relates to Content Modulation is responsive, even if the federal official does not deem the subject-matter to be Misinformation. For example, if a White House official emailed Meta and stated, “Please censor the following Facebook posts that are critical of the President,” regardless of whether the official viewed the posts as misleading or untruthful, that is highly relevant information, even if though it would relate to Content Modulation but arguably not to Misinformation. And our First Amended Complaint explicitly alleges that such pressure is happening. To be clear, we request that you produce relevant documents that relate to Content Modulation **and/or** Misinformation, not just to Misinformation.
- (4) The responses to interrogatories from DHS and CISA are so vague, generalized, and (in some cases) non-responsive as to be, in many cases, nearly meaningless. They fail to provide even basic information (such as the participants in recurring meetings), especially about oral communications with social-media platforms. This concern applies, for example, to DHS’s responses to Interrogatories 4, 6, 7, 9, 13, and 14 (using our original Rog numbers), Jankowicz’s response to Rog 9, and Easterly’s responses to Rogs 4, 8, and 10. We request that you promptly resubmit responses to these interrogatories that actually provide meaningful information, in reasonable detail, about the matters under examination.
- (5) You have objected to the definition of “Communication” and stated that you will only search for emails, not other forms of communication. See, e.g., Interrogatory Responses, at 3-4. We disagree with this restriction as artificial and baseless. The emails you have produced demonstrate that federal officials communicated in writing with social-media platforms via alternative written channels, beside email. For example, Meta trained CDC and Census employees on a “Facebook misinfo reporting channel,” and Twitter allowed federal officials to submit censorship issues on a “Partner Support Portal.” As federal officials were using such alternative channels to “flag problematic posts” or otherwise discuss content modulation and censorship, those are highly relevant communications. Further, if federal officials are or were using other written mediums such as text messaging, instant messaging, private email, etc., to communicate with social-media platforms, those communications are discoverable as well.
- (6) You have artificially limited the definition of “Social-Media Platform” to include only Facebook, Instagram, YouTube, LinkedIn, and Twitter. But your own interrogatory responses confirm meetings involving other social-media platforms, such as Reddit, Verizon, Google Search, Wikimedia, etc. See, e.g., Interrogatory Responses, at 32. And our First Amended Complaint includes many allegations about censorship on other platforms than the five you identify, such as NextDoor, Google Search, and others. To be clear, the federal agencies and officials are in the best position to know what social-media platforms they communicate with, and how to identify and search for communications with them. It is not unduly burdensome for those officials to identify which social-media platforms they have been in communication with, when the federal officials involved in the

communications are obviously aware, from their own personal knowledge, of such involvement. We do not agree with the artificially narrowing of this definition.

- (7) You have declined to provide any privilege log to date, and you object to producing a privilege log on ground of burdensomeness. See, e.g., Interrogatory Responses, at 6 (Obj. 12). It is not clear to us whether or when you plan to produce a privilege log. Your document production, however, contains many examples of documents redacted for privilege without sufficient information to meaningfully assess the basis of withholding – such as, for example, Bates Number 8212 which is entirely redacted with the notation “Document Withheld for Privilege.” And there may be many documents which are not redacted, but simply not produced at all. Respectfully, we request the prompt production of a privilege log. The obligation to produce a privilege log is clearly set forth in the Rules and the case law, and we explicitly requested one in both our interrogatories and RFPs. We are concerned that you may intend to withhold relevant materials on grounds that do not appear to reflect well-recognized privileges – such as your recent statement in your email of last Thursday, regarding yet-unproduced documents, that “[s]ome of those documents are under review for potential law enforcement and national security issues.” We request that you produce a privilege log of responsive-but-withheld materials without further delay. This request is time-sensitive because we obviously need your privilege log to meaningfully identify and confer about specific withheld documents before next Monday’s deadline to submit a joint statement of disputed issues with the Court.
- (8) Search terms. Your Interrogatory responses state that you used a set of “reasonable search terms” to identify responsive materials. Your interrogatories specifically object to the use of our Search Terms (as defined by Plaintiffs), and you state that you used your own “one or more reasonable search terms” (which are not disclosed) instead. See Interrogatory Responses, at 36-37. But your RFP responses seem to indicate that you used the “Search Terms” that Plaintiffs provided, and not a different set constructed by you. It is not clear to us what search terms you used to identify responsive materials, or whether you relied on additional sources of information (such as the human knowledge of key custodians) to collect responsive materials. To be clear, our “Search Terms” were explicitly provided as a back-up to catch any materials that other good-faith methods of searching might have missed. They were not intended to supply to sole or primary method of searching, or serve as a substitute for human knowledge of covered custodians. That is why we asked every defendant to identify and produce all Communications with Social-Media Platform(s) that relate to Content Modulation and/or Misinformation, **and** all Communications with Social-Media Platform(s) that contain any of our Search Terms. We request that you identify your methodology of searching for responsive materials, including but not limited to any search terms used.
- (9) You have objected to identifying oral communications in response to Interrogatories (such as phone calls, teleconferences, video meetings by Zoom or similar videoconference, etc.), and have indicated that you are only searching for emails. We disagree with this position. Your clients are required to use reasonable efforts to identify oral communications with Social-Media Platforms and respond to interrogatories identifying such oral communications.
- (10) HHS has indicated that it is producing responsive information within the knowledge of the Office of Surgeon General, the CDC, and NIAID. But the First Amended Complaint has separately named HHS and Secretary Becerra, not just those three sub-components, as Defendants, and it contains many allegations of HHS’s involvement in social-media censorship. Further, it is eminently likely that responsive information is contained within other branches of HHS – for example, the First Amended Complaint quotes emails from NIH director Dr. Francis Collins that are highly relevant to the social-media censorship of the Great Barrington Declaration, etc. We request that you expand your responses to include all responsive information on behalf of HHS, not just the three HHS sub-divisions or components you have identified.
- (11) You have categorically objected to identifying or producing documents and communications sent via private email accounts and/or private devices. Yet all Defendants have been asked to identify and produce their Communications with Social-Media Platforms about Content Modulation and/or Misinformation. If federal

officials are or were communicating with Social-Media Platforms about Content Modulation and/or Misinformation on their personal accounts and devices, those are relevant and responsive documents, and those officials are required to identify and produce such documents. Each agency and official Defendant is specifically asked in Common Interrogatory 2 to identify them. Likewise, if the agency Defendants' key custodians know that they have used private accounts and devices for such communications, they are required to identify and produce them. For example, if Dr. Fauci emails with Mark Zuckerberg from a private email address about modulating content on Meta platforms, such communications have to be identified and produced, and the same is true of all other Defendants, including both individuals and agencies.

- (12) You have categorically objected to RFPs 4 and 5, which seek org charts for governmental divisions and social-media platforms of organizations engaged in the relevant communications, and you have produced no documents. Producing such org charts is common practice as they provide important contextual information that allows the parties to identify the persons engaged in or copied on email communications and otherwise mentioned in documents produced. We request that you produce such org charts that are in your clients' possession and are responsive to our RFPs.
- (13) RFP 9 to Nina Jankowicz asked for information about the planned meeting with Twitter executives Nick Pickles and Yoel Roth. You respond merely by stating that the meeting did not occur. But the RFP specifically asked for documents and communications about what was "to be discussed" at that meeting, regardless of whether or not it occurred, and those are obviously relevant materials. Please produce those materials without delay.
- (14) RFP 11 to Dr. Fauci requested his communications with Mark Zuckerberg. These are directly relevant to the allegation in the Complaint and First Amended Complaint that Dr. Fauci covertly coordinated with Mark Zuckerberg about Content Modulation and Misinformation from early 2020, if not earlier, based on quotations from emails between the two previously produced. The course of communication between the two of them is relevant to elucidate the course of communications. Please provide the documents requested in this RFP. Likewise, for similar reasons, we request a complete production from Dr. Fauci to RFP 12.

In addition, we flag some additional issues for discussion at the same time: (1) the timing of your completion of the redacted production for public disclosure, (2) the additional redactions of names that Kuntal requested last week, (3) the timing of your completed production, (4) the fact that your interrogatory responses are marked "Confidential" for reasons not clear to us, and (5) the clawback agreement that Kyla circulated on Friday.

We will not hesitate to raise additional issues as they occur to us. Please let us know your availability on Wednesday to discuss these issues.

Thanks, John

From: Cholera, Kuntal (CIV) <Kuntal.Cholera@usdoj.gov>
Sent: Thursday, August 18, 2022 3:43 PM
To: Sauer, John <John.Sauer@ago.mo.gov>; Murrille@ag.Louisiana.Gov; Capps, Kenneth <Kenneth.Capps@ago.mo.gov>; Johnson, Jeff <Jeff.Johnson@ago.mo.gov>; 'Megan Wold' <mwold@cooperkirk.com>; Brian Barnes <BBarnes@cooperkirk.com>; Scott, Todd <Todd.Scott@ago.mo.gov>
Cc: Snow, Kyla (CIV) <Kyla.Snow@usdoj.gov>; Sur, Indraneel (CIV) <Indraneel.Sur@usdoj.gov>; Kirschner, Adam (CIV) <Adam.Kirschner@usdoj.gov>
Subject: RE: 3:22-cv-01213-Missouri et al v. Biden

Hi John,

Thank you for your e-mail, and please do let us know of any technical issues with the documents.

Regarding your concerns about rolling productions, I want to reiterate the relevant context. As you mentioned, we are in the middle of expedited discovery with a highly compressed timeline. Plaintiffs served 8 sets of RFPs and 10 sets of Interrogatories to a slew of government agencies and officials. Over the next thirty days, we had to identify relevant custodians, pull relevant documents, load them into a review platform, and review those documents. Although Rule 34 only requires that responding parties produce documents in a reasonable time following service of their responses and objections, we managed to produce over 1,000 documents concurrently with our responses and objections which, as we mentioned, represents the majority of documents we intend to produce. We understand the compressed schedule the Court imposed and are endeavoring to produce the remaining batches of documents in the next few days (including at least one batch tonight or tomorrow). We did not reach out to you to discuss this issue earlier because we were devoting our time and attention towards getting as many documents as possible processed in the initial set.

After the next set that is slated to go out tonight or tomorrow, we estimate that, with family members, there are approximately 500 documents remaining to process and produce. Some of those documents are under review for potential law enforcement and national security issues. We will endeavor to complete that review as soon as possible.

Thanks,
Kuntal

From: Sauer, John <John.Sauer@ago.mo.gov>
Sent: Thursday, August 18, 2022 12:50 PM
To: Cholera, Kuntal (CIV) <Kuntal.Cholera@usdoj.gov>; Murrille@ag.Louisiana.Gov; Capps, Kenneth <Kenneth.Capps@ago.mo.gov>; Johnson, Jeff <Jeff.Johnson@ago.mo.gov>; 'Megan Wold' <mwold@cooperkirk.com>; Brian Barnes <BBarnes@cooperkirk.com>; Scott, Todd <Todd.Scott@ago.mo.gov>
Cc: Snow, Kyla (CIV) <Kyla.Snow@usdoj.gov>; Sur, Indraneel (CIV) <Indraneel.Sur@usdoj.gov>; Kirschner, Adam (CIV) <Adam.Kirschner@usdoj.gov>
Subject: [EXTERNAL] RE: 3:22-cv-01213-Missouri et al v. Biden

Kuntal-

We are in receipt of your production last night, and we are reviewing as quickly as possible to identify issues for further discussion, which we will identify for you as soon as possible – likely on an ongoing basis. This email is to express our grave concern about your statement below and in the objections to the RFPs that you intend to make rolling productions between August 17 and August 25, which may not even be completed by August 25, as your RFP objections state: “Defendant will make rolling productions, consisting of the documents Defendant has agreed to produce herein, starting on August 17, 2022 and will endeavor to complete those productions on or before August 25, 2022.” Respectfully, the expedited court-ordered schedule requires us to meet and confer, identify all disputed issues, and present a joint statement to the Court by no later than Monday, August 29, 2022. If your production is not completed until Thursday Aug. 25, that would leave only two business days for the parties to review, identify issues, and meet and confer – rather than the 10 days explicitly contemplated by the Court’s order. We are, moreover, deeply disappointed that this scheduling issue was never raised to us in our multiple prior conferences, and we found out only late last night that we would receive an incomplete production on August 17. We request that you notify us as soon as possible (1) what is the anticipated volume of documents that remain to be produced, (2) how quickly the yet-unavailable documents can be produced, and (3) what issues, if any, have caused the delay in production past deadlines in the court-ordered discovery schedule.

Second, please let us know as soon as possible when we may receive the redacted copies of the documents that the parties have agreed shall be produced. This is time-sensitive because those documents may need to be used in court filings. We request that, in preparing those, the Bates numbers used in the redacted versions track identically to the

Bates numbers of the unredacted versions. Otherwise, the parties will have great difficulty matching and using the redacted versions for public filing.

Third, we have encountered a few technical issues regarding certain pages of the documents. Jeff Johnson will reach out to your team today or tomorrow to address these.

Thanks, John

From: Cholera, Kuntal (CIV) <Kuntal.Cholera@usdoj.gov>
Sent: Wednesday, August 17, 2022 8:17 PM
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Cc: Snow, Kyla (CIV) <Kyla.Snow@usdoj.gov>; Sur, Indraneel (CIV) <Indraneel.Sur@usdoj.gov>; Kirschner, Adam (CIV) <Adam.Kirschner@usdoj.gov>
Subject: 3:22-cv-01213-Missouri et al v. Biden

Counsel,

Today, the contact you identified for us (Jeff Johnson) should be able to access our first production—containing over a thousand communications and documents, which we expect will represent a majority of the documents Defendants will produce—in response to Plaintiffs’ Requests for the Production of Documents.

Further, attached are our Responses and Objections to Plaintiffs’ Requests for the Production of Documents and Plaintiffs’ Interrogatories. As noted in our Responses and Objections to Plaintiffs’ Requests for the Production of Documents, Defendants intend to make rolling productions as additional documents become ready for production.

Let us know, of course, if there are any technical issues with tonight’s production.

Thank you,
Kuntal, Indraneel, and Kyla

Kuntal Cholera
Trial Attorney, Federal Programs Branch
U.S. Department of Justice
202.305.8645

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

**The State of Missouri and the State of
Louisiana,**

Plaintiffs,

v.

**President Joseph R. Biden, Jr., in his official
capacity as President of the United States of
America, et. al.,**

Defendants.

Civil Action No. 22-cv-1213

**DEFENDANTS U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES’
AND SECRETARY XAVIER BECERRA’S OBJECTIONS TO
PLAINTIFFS’ REQUESTS FOR THE PRODUCTION OF DOCUMENTS**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Defendants U.S. Department of Health and Human Services (“HHS”) and Xavier Becerra, in his official capacity as Secretary of the Department of Health and Human Services (collectively, “Defendants”), by and through their undersigned counsel, hereby submit the following objections to Plaintiffs’ Requests for the Production of Documents (“RFPs”).

Objections to Definitions and Instructions

1. Defendants object to the definitions of “Content Modulation,” and the related term “Misinformation,” including to the extent that Plaintiffs’ definition of “Content Modulation” covers actions by Social Media Companies beyond those taken against content containing Misinformation and against users posting content containing Misinformation (such as actions taken as to any post on “efficacy of COVID-19 restrictions” or on “security of voting by mail”). For purposes of these Responses and Objections, Defendants generally define “Misinformation” in a manner consistent with Plaintiffs’ definition of that term: “any form of speech . . . considered to be potentially or actually incorrect, mistaken, false, misleading, lacking proper context, disfavored, having the

tendency to deceive or mislead . . . including but not limited to any content or speech considered by any federal official or employee or Social-Media Platform to be ‘misinformation,’ ‘disinformation,’ ‘malinformation,’ ‘MDM,’ ‘misinfo,’ ‘disinfo,’ or ‘malinfo.’” *See* RFP, Definition O. A broader definition of “Content Modulation,” or “Misinformation,” would cover subject-matter that goes beyond the scope of, and would thus not be relevant to, Plaintiffs’ claims.

2. Defendants object to the definitions of CDC, CISA, DHS, HHS, NIAID, and White House Communications Team to the extent those definitions include “any . . . agent,” “contractors,” “divisions, agencies, boards, employees, contractors, and any subordinate agency or entity” of those agencies on the ground that those definitions are overbroad and may include persons and entities that are not under the supervision or control of any Defendant. Furthermore, the Complaint contains no allegations concerning any component or officer of HHS separate and apart from the HHS components that have received their own requests for production: the Centers for Disease Control and Prevention, Dr. Anthony Fauci, in his official capacity as Director of the National Institute of Allergy and Infectious Diseases, the National Institute of Allergy and Infectious Diseases, and Surgeon General Vivek H. Murthy. Defendants interpret the Requests targeted at Defendants to apply only to the aforementioned components and officers of HHS.

3. Defendants object to the definition of “document” to the extent it includes “documents retained on personal devices and/or in personal email accounts or other personal accounts.” Documents found on personal devices or within electronic personal accounts would not be in the custody or control of any Defendant.

4. Defendants object to the definition of “Social-Media Platform” as overbroad, because it includes “*any* organization that provides a service for public users to disseminate . . . content . . . to other users or the public, along with any “contractors, or any other person . . . acting on behalf of the Social-Media Platform . . . as well [as] subcontractors or entities used to conduct fact-checking

or any other activities relating to Content Modulation.” The Complaint contains no nonconclusory allegation that Defendants communicated with each and every organization that allows users to “disseminate . . . content” to other users, along with any persons or entities affiliated with those organizations. Defendants will construe “Social-Media Platform” to encompass Facebook, Instagram, Twitter, LinkedIn, and YouTube.

5. Defendants object to the definition of “You” an “Your” as overbroad as it includes “any officers, officials, employees, agents, staff members, contractors, and other(s)” acting at the direction, or on behalf, of HHS and Secretary Becerra. Such a definition is not proportional to the needs of the case, especially given the expedited, abbreviated discovery process where Defendants have only a limited amount of time to conduct a document search and produce responsive documents. Furthermore, the Complaint contains no allegations concerning any component or officer of HHS separate and apart from the HHS components that have received their own requests for production: the Centers for Disease Control and Prevention, Dr. Anthony Fauci, in his official capacity as Director of the National Institute of Allergy and Infectious Diseases, the National Institute of Allergy and Infectious Diseases, and Surgeon General Vivek H. Murthy. Defendants interpret the Requests targeted at Defendants to apply only to the aforementioned components and officers of HHS.

6. Defendants object to Instruction 1. Plaintiffs cite to no authority requiring a recipient of discovery requests to “describe the efforts [it has] made to locate . . . document[s]” that are not in its custody and control “and identify who has control of the document and its location.”

7. Defendants object to Instruction 2 to the extent it exceeds the requirements of F.R.C.P. 26(b)(6).

8. Defendants object to Instruction 3. Plaintiffs cite to no authority indicating that, if Defendants object to a request on burden grounds, Defendants must “stat[e] the approximate number of documents to be produced, the approximate number of person-hours to be incurred in the

identification, and the estimated cost of responding to the request.” Further, it is unclear how Defendants could provide that type of information without conducting certain burdensome document searches and reviews that Defendants sought to avoid through their objections. As required by the Federal Rules of Civil Procedure, Defendants will “state with specificity the grounds for objecting to the request [at issue], including the reasons” for the objection. F.R.C.P. 34(b)(2)(B).

9. Defendants object to Instruction 5 as unduly burdensome to the extent it requires Defendants to produce electronic documents “with all metadata and delivered in their original format.” Plaintiffs may identify the precise categories of metadata they believe they require to adequately litigate their claims, and the parties may then meet-and-confer over the issue.

10. Defendants object to Instruction 6 to the extent that it requires Defendants to produce documents in a format other than the format in which they are “kept in the usual course of business.” F.R.C.P. 34 (b)(2)(E). Defendants object to Instruction 6 to the extent that it requests the production of all e-mail “forwards” for e-mails produced to Plaintiffs. That request may call for the production of documents that are not found in the e-mail files of the relevant custodians used by Defendants.

11. Defendants object to the Instruction in the introductory paragraph calling on Defendants to produce documents responsive to Plaintiffs’ Requests by August 17, 2022. Defendants will make rolling productions, consisting of the documents Defendants have agreed to produce herein, starting on August 17, 2022 and will endeavor to complete those productions on or before August 25, 2022.

Objections Applicable to All Requests

1. The general objections set forth below apply to each and every discovery request discussed below. In asserting Defendants’ objections to specific discovery requests, Defendants may assert an objection that is the same as, or substantially similar to, one or more of these objections. Defendants may do so because the language of the discovery request itself may signal particular and

specific concerns that the discovery request at issue may be objectionable based on the grounds stated. The fact that Defendants may specifically reference some of the objections described immediately below in their objections to Plaintiffs' individual requests, but not others from the same list, does not indicate that Defendants has waived any of these objections as to any of Plaintiffs' requests.

2. Defendants respectfully maintain that discovery is inappropriate in a matter such as this one challenging federal agency action. *See generally Fla. Power & Light Co. v. Lorion*, 470 U.S. 729, 743-44 (1985). Challenges to administrative agency action are ordinarily not subject to discovery. *See id.*

3. Defendants object to Plaintiffs' discovery requests to the extent that they seek (a) attorney work product; (b) communications protected by the attorney-client privilege; (c) information protected by the deliberative process privilege or law enforcement privilege; (d) material the disclosure of which would violate legitimate privacy interests and expectations of persons not party to this litigation; (e) information protected by any form of executive privilege; or (f) information covered by any other applicable privilege or protection.

4. Defendants object to each Request to the extent it seeks documents that are not in the custody or control of any Defendant.

5. Defendants object to each Request to the extent it seeks all communications and documents from each Defendant relating to the substantive topic identified in the Request. The parties are currently involved in an expedited, abbreviated discovery process where Defendants have only a limited amount of time to conduct a document search and produce responsive documents. Defendants will only produce non-privileged, responsive documents that it expressly agrees to produce herein, so long as those documents are found in the files collected from a reasonable set of custodians and contain one or more reasonable search terms.

6. Defendants specifically reserve the right to make further objections as necessary to the extent additional issues arise regarding the meaning of and/or information sought by Plaintiffs' discovery requests.

Objections to Specific Requests for the Production of Documents

Request 1: Produce all Documents identified, referred to, or relied on in answering Plaintiffs' Interrogatories to You, including but not limited to all Communications identified in response to those Interrogatories.

Response: In addition to the foregoing general objections, Defendants object to this Request as vague because it is unclear what it means to "rel[y]" on a document, as compared to "referr[ing]" to a document, in answering an Interrogatory. Defendants also object to this Request to the extent it seeks documents protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to this objection, Defendants will produce non-privileged documents expressly identified in Defendants' answers to the Interrogatories.

Request 2: Produce all Communications with any Social-Media Platform relating to Misinformation and/or Content Modulation.

Response: In addition to the foregoing general objections, Defendants object to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case. This Request calls for *any and all* communications from any Defendant or any employee or subordinate of any Defendant, to *any and all* Social-Media Platforms, even if those platforms are not at issue in the Complaint. Defendants cannot conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule. Defendants also understand this request to seek only communications between Defendants and third parties outside the government. Further, to the extent this Request seeks any purely internal documents or records,

Defendants object to the Request as not proportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery and would be unnecessary in light of the external documents Defendants have agreed to produce. Defendants also object to this Request to the extent it seeks documents protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to the foregoing objections, Defendants will produce non-privileged e-mail communications between Defendants and employees of Facebook, Twitter, LinkedIn, Instagram, and YouTube (the “Social-Media Platforms”) concerning Misinformation located within a review population consisting of e-mail files that (i) are collected from custodians who, having been identified through Defendants’ internal inquiry, are believed to have communicated with employees of the Social-Media Platforms (the “Custodial Social Media E-mails”),¹ and (ii) contain one or more of Plaintiffs’ Search Terms.

Request 3: Produce all Communications with any Social-Media Platform that contain any of the Search Terms.

Response: In addition to the foregoing general objections, Defendants object to this Request as unduly burdensome, overbroad, and not proportional to the needs of this case. This Request calls for *any and all* specified documents from any Defendant or any employee or subordinate of any Defendant. To conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Furthermore, this Request

¹ Defendants collected, from those custodians, e-mail correspondence with Social-Media Platform employees who had e-mail addresses with the domain names of @meta.com, @fb.com, @facebook.com, @twitter.com, @instagram.com, @linkedin.com, @youtube.com, @microsoft.com, and @google.com.

covers documents that are not relevant to Plaintiffs' claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning "the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications." ECF No. 34 at 13. This Request, however, would require the production of any document that contains any of Plaintiffs' Search Terms, regardless of whether that document pertains to Misinformation. Plaintiffs' Search Terms include many broad terms that could be found in e-mails that have nothing to do with misinformation, such as "election," "antitrust," and "Kennedy." Defendants also understand this Request to seek only communications between Defendants and third parties outside the government. Further, to the extent this Request seeks any purely internal documents or records, Defendants object to the Request as not proportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery and would be unnecessary in light of the external documents Defendants have agreed to produce. Defendants also object to this Request to the extent it seeks documents protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to the foregoing objection, Defendants will produce non-privileged e-mail communications between Defendants and employees of the Social-Media Platforms concerning Misinformation that can be located within a review population consisting of Custodial Social Media E-mails that contain one or more of Plaintiffs' Search Terms.

Request 4: Produce organizational charts of any office or group, including HHS leadership, NIAID leadership, CDC leadership, any communications teams, advisory board, working groups, task forces, "analytic exchange," or other group that has communicated or is communicating with any Social-Media Platform relating to Misinformation and/or Content Modulation.

Response: In addition to the foregoing general objections, Defendants object to this Request as vague because it does not define what constitutes a “communications team,” an “advisory board,” a “working group,” “task force,” or a “group.” Defendants also object to this Request as overbroad because it calls for documents that are not relevant to Plaintiffs’ claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. The organizational charts identified in this Request would do far more than identify persons who have been “communicating with social-media platforms” about misinformation; *e.g.*, by identifying other persons who simply fall within the same organizational structure.

Request 5: Produce organizational charts of any Social-Media Platform that identify any person(s) You communicate with or have communicated with relating to Misinformation and/or Content Modulation.

Response: In addition to the foregoing general objections, Defendants object to this Request because Defendants do not, in their ordinary course of business, maintain any organizational charts for third party Social-Media Platforms. Accordingly, this Request would not be proportional to the needs of the case, particularly in light of the Court’s order permitting Plaintiffs to seek such information directly from the third parties themselves. Defendants also object to this Request because it calls for documents that are not relevant to Plaintiffs’ claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. The organizational charts identified in this Request would not

identify any “federal officials” who have been “communicating with social-media platforms” about misinformation, nor would it describe the contents of those communications.

Request 6: Produce all Documents and Communications relating to any coordination between Social-Media Platform and any “member of our senior staff” and/or “member of our COVID-19 team,” who are “in regular touch with ... social media platforms,” as Jennifer Psaki stated at a White House press briefing on or around July 15, 2021.

Response: In addition to the foregoing general objections, Defendants object to this Request as vague because it relies on a characterization of a statement made by an individual other than an employee of HHS or Secretary Becerra, and the statement does not specify the individuals at issue or the specific communications referenced. Defendants further object to this Request as unduly burdensome and not proportional to the needs of the case. This Request calls for *any and all* specified documents from any Defendant or any employee or subordinate of any Defendant. To conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Defendants also object to this Request as overbroad because it calls for documents that are not relevant to Plaintiffs’ claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications.” ECF No. 34 at 13. This Request appears to call for communications with Social-Media Platforms regardless of whether they pertain to Misinformation. Further, to the extent this Request seeks any purely internal documents or records, Defendants object to the Request as not proportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery and would be

unnecessary in light of the external documents Defendants have agreed to produce. Defendants also object to this Request to the extent it seeks documents protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to the foregoing objection, Defendants will produce non-privileged e-mail communications between Defendants and employees of the Social-Media Platforms concerning Misinformation that can be located within a review population consisting of Custodial Social Media E-mails that contain one or more of Plaintiffs' Search Terms.

Request 7: Produce all Communications with any Social-Media Platform that relating to the “12 people who are producing 65 percent of the anti-vaccine misinformation on social-media platforms,” as Jennifer Psaki stated at a White House press briefing on or around July 15, 2021.

Response: In addition to the foregoing general objections, Defendants object to this Request as vague because it relies on a characterization of a statement made by an individual other than an employee of HHS or Secretary Becerra, and the statement does not specify the individuals at issue or the specific communications referenced. Defendants further object to this Request as unduly burdensome and not proportional to the needs of the case. This Request calls for *any and all* specified documents from any Defendant or any employee or subordinate of any Defendant. To conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Defendants also understand this Request to seek only communications between Defendants and third parties outside the government. Further, to the extent this Request seeks any purely internal documents or records, Defendants object to the Request as not proportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery and would be

unnecessary in light of the external documents Defendants have agreed to produce. Defendants also object to this Request to the extent it seeks documents protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to the foregoing objection, Defendants will produce non-privileged e-mail communications between Defendants and employees of the Social-Media Platforms concerning Misinformation that can be located within a review population consisting of Custodial Social Media E-mails that contain one or more of Plaintiffs' Search Terms.

Request 8: Produce all Documents and Communications with any Social-Media Platforms that You “engage with ... regularly” relating to “what [Y]our asks are” to such Social-Media Platform(s), as Jennifer Psaki stated at the White House press briefing on or around July 15, 2021.

Response: In addition to the foregoing general objections, Defendants object to this Request as vague because it relies on a characterization of a statement made by an individual other than an employee of HHS or Secretary Becerra, and the statement does not specify the individuals at issue or the specific communications referenced. Defendants further object to this Request as unduly burdensome and not proportional to the needs of the case. This Request calls for *any and all* specified documents from any Defendant or any employee or subordinate of any Defendant. To conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Defendants also object to this Request as overbroad because it calls for documents that are not relevant to Plaintiffs' claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning “the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and

content of those communications.” ECF No. 34 at 13. This Request appears to call for communications with Social-Media Platforms regardless of whether they pertain to Misinformation. Further, to the extent this Request seeks any purely internal documents or records, Defendants object to the Request as not proportional to the needs of the case, as it would require an extensive search of internal records that would not be possible to complete in the expedited period provided for current discovery and would be unnecessary in light of the external documents Defendants have agreed to produce. Defendants also object to this Request to the extent it seeks documents protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to the foregoing objection, Defendants will produce non-privileged e-mail communications between Defendants and employees of the Social-Media Platforms concerning Misinformation that can be located within a review population consisting of Custodial Social Media E-mails that contain one or more of Plaintiffs’ Search Terms.

Request 9: Produce all Documents and Communications relating to any “government experts” who have “partnered with” Facebook or any Social-Media Platform to address Misinformation and/or Content Modulation.

Response: In addition to the foregoing general objections, Defendants object to this Request as vague because it relies on a characterization of statement made by a third-party outside of government, and the statement does not specify the individuals at issue or the specific communications referenced. Defendants further object to this Request as unduly burdensome and not proportional to the needs of the case. This Request calls for *any and all* specified documents from any Defendant or any employee or subordinate of any Defendant. To conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the

case. Defendants also object to this Request as overbroad because it calls for documents that are not relevant to Plaintiffs' claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning "the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications." ECF No. 34 at 13. This Request appears to call for more than direct communications with Social-Media Platforms concerning Misinformation. It appears to also call for purely internal documents that relate to unspecified "government experts." Defendants also object to this Request to the extent it seeks documents protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to the foregoing objection, Defendants will produce non-privileged e-mail communications between Defendants and employees of the Social-Media Platforms concerning Misinformation that can be located within a review population consisting of Custodial Social Media E-mails that contain one or more of Plaintiffs' Search Terms.

Request 10: Produce all Documents and Communications relating to the statement that federal officials "engage[s] regularly with all social media platforms about steps that can be taken" to address Misinformation on social media, which engagement "has continued, and ... will continue," as Jennifer Psaki stated at the April 25, 2022 White House press briefing.

Response: In addition to the foregoing general objections, Defendants object to this Request as vague because it relies on a characterization of a statement made by an individual other than an employee of HHS or Secretary Becerra, and the statement does not specify the individuals at issue or the specific communications referenced. Defendants further object to this Request as unduly burdensome and not proportional to the needs of the case. This Request calls for *any and all* specified documents from any Defendant or any employee or subordinate of any Defendant that relate to the specified statement. To

conduct an exhaustive search to uncover all documents responsive to this Request, and process those documents for production, under the current, abbreviated expedited discovery schedule would be impractical, unduly burdensome, and disproportionate to the needs of the case. Defendants also object to this Request as overbroad because it calls for documents that are not relevant to Plaintiffs' claims and that do not fall within scope of discovery authorized by the Court. The Court authorized the service of discovery requests concerning "the identity of federal officials who have been and are communicating with social-media platforms about [misinformation and] any censorship or suppression of speech on social media, including the nature and content of those communications." ECF No. 34 at 13. This Request appears to call for more than direct communications with Social-Media Platforms concerning Misinformation. It appears to also call for purely internal documents that simply "relate" to a statement concerning communications with social media platforms. Defendants also object to this Request to the extent it seeks documents protected by the deliberative process privilege, attorney-client privilege, law enforcement privilege, a statutory national security privilege, or any other applicable privilege.

Subject to the foregoing objection, Defendants will produce non-privileged e-mail communications between Defendants and employees of the Social-Media Platforms concerning Misinformation that can be located within a review population consisting of Custodial Social Media E-mails that contain one or more of Plaintiffs' Search Terms.

Dated: August 17, 2022

Respectfully submitted,

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