

From: Clark, Charity <Charity.Clark@vermont.gov>
Sent: Monday, February 22, 2021 6:03 PM
To: Justin Glawe <jgfoia@gmail.com>
Subject: RE: PRA request dated 9/4/20

Hi, Justin,

I apologize for the tardy reply. Responses to your 9/4/20 request for public records are attached. You requested our communications with Facebook from August 1, 2020 to the time of your request. Because complying with your request took less than 30 minutes, there is no charge for these records. Note that, pursuant to 1 V.S.A. § 317(c)(7), I have redacted contact information for an individual outside of our office.

Please let me know if you have any questions.

Thank you.
Charity

Curtis, Christopher

From: Will Castleberry [REDACTED]
Sent: Wednesday, August 19, 2020 5:10 PM
To: Will Castleberry
Cc: Jess Leinwand; Gina Moon; Dan Sachs; Erica Woods
Subject: Facebook Hand Sanitizer Ban Update

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Hello all,

Hope you are doing well. This is a quick follow up my June email (below) about lifting our ban on non-medical masks. We are now lifting our temporary ban on promoting hand sanitizer and surface disinfectant wipes in organic posts, ads, and commerce listings.

Like our June update regarding non-medical masks, we will be implementing the same eligibility and ad targeting restrictions.

As always, we will take down instances of price gouging that your offices report to us.

Let me know if you have any questions.

Thanks,

Will
[REDACTED]

Hello all,

I wanted to give you a quick heads up to a slight change we are making with regard to our ban on masks. First, thank you for all of your help in combating price gouging. We received hundreds of reports from your offices and we have been able to take down the violating content (usually within a day). Your efforts went a long way in helping us to better protect the people who use our service!

Since health authorities now advise wearing non-medical masks for an expanding list of activities, and we've seen businesses of all sizes working to fill this need, **we are adjusting our temporary ban to allow people to promote and sell non-medical masks.** We hope this change will allow people to more easily find and obtain these types of masks and that small businesses will be better able to meet an important need. We will still maintain a temporary ban on selling medical masks (such as surgical or N95 masks) as well as hand sanitizer, testing kits, and disinfecting wipes in our ongoing effort to prevent their exploitation for financial gain. We are also implementing a few additional safeguards. For example, all advertisers promoting non-medical masks will be required to have an advertising history of at least 4 months and, in certain countries with high volumes of violating ads, we will restrict people's ability to advertise to within their jurisdiction (i.e. advertisers based in Vietnam will only be able to run ads for non-medical masks targeting people in Vietnam).

Thanks again and please let me know if you have any questions or concerns about this change. It seems like the best way to continue to fight fraud while letting small businesses meet the growing demand for non-medical masks.

All the best,

Will Castleberry
Facebook Public Policy



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From: [Will Castleberry](#)
To: [Will Castleberry](#)
Subject: Facebook Election Announcement
Date: Thursday, September 3, 2020 7:41:14 AM

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

(AGs on this note)

Hello all,

I wanted to make sure you saw our CEO's announcement about new steps we are taking to encourage voting, connect people with authoritative information, and fight misinformation. Here is the Post. <https://www.facebook.com/zuck/posts/10112270823363411> (Text Below)

As always, please reach out if you have any question.

From Mark Zuckerberg

The US elections are just two months away, and with Covid-19 affecting communities across the country, I'm concerned about the challenges people could face when voting. I'm also worried that with our nation so divided and election results potentially taking days or even weeks to be finalized, there could be an increased risk of civil unrest across the country.

This election is not going to be business as usual. We all have a responsibility to protect our democracy. That means helping people register and vote, clearing up confusion about how this election will work, and taking steps to reduce the chances of violence and unrest.

Facebook is already running the largest voting information campaign in American history -- with a goal of helping 4 million people to register and then vote. In just three days, we already drove almost 24 million clicks to voter registration websites. Priscilla and I have also personally donated \$300 million to non-partisan organizations supporting states and local counties in strengthening our voting infrastructure.

Today, we're announcing additional steps we're taking at Facebook to encourage voting, connect people with authoritative information, and fight misinformation. These changes reflect what we've learned from our elections work over the past four years and the conversations we've had with voting rights experts and our civil rights auditors:

- We will put authoritative information from our Voting Information Center at the top of Facebook and Instagram almost every day until the election. This will include video tutorials on how to vote by mail, and information on deadlines for registering and voting in your state.
- We're going to block new political and issue ads during the final week of the campaign. It's important that campaigns can run get out the vote campaigns, and I generally believe the best antidote to bad speech is more speech, but in the final days of an election there may not be enough time to contest new claims. So in the week before the election, we won't accept new political or issue ads. Advertisers will be able to continue running ads they started running before the final week and adjust the targeting for those ads, but those ads will already be published transparently in our Ads Library so anyone, including fact-checkers and journalists, can scrutinize them.
- We're going to extend our work with election officials to remove misinformation about voting. We

already committed to partnering with state election authorities to identify and remove false claims about polling conditions in the last 72 hours of the campaign, but given that this election will include large amounts of early voting, we're extending that period to begin now and continue through the election until we have a clear result. We've already consulted with state election officials on whether certain voting claims are accurate.

- We're reducing the risk of misinformation and harmful content going viral by limiting forwarding on Messenger. You'll still be able to share information about the election, but we'll limit the number of chats you can forward a message to at one time. We've already implemented this in WhatsApp during sensitive periods and have found it to be an effective method of preventing misinformation from spreading in many countries.
- We're expanding our voter suppression policies. We already remove explicit misrepresentations about how or when to vote that could cause someone to lose their opportunity to vote -- for example, saying things like "you can send in your mail ballot up to 3 days after election day", which is obviously not true. (In most states, mail-in ballots have to be *received* by election day, not just mailed, in order to be counted.) We're now expanding this policy to include implicit misrepresentations about voting too, like "I hear anybody with a driver's license gets a ballot this year", because it might mislead you about what you need to do to get a ballot, even if that wouldn't necessarily invalidate your vote by itself.
- We're putting in place rules against using threats related to Covid-19 to discourage voting. We will remove posts with claims that people will get Covid-19 if they take part in voting. We'll attach a link to authoritative information about Covid-19 to posts that might use the virus to discourage voting, and we're not going to allow this kind of content in ads. Given the unique circumstances of this election, it's especially important that people have accurate information about the many ways to vote safely, and that Covid-19 isn't used to scare people into not exercising their right to vote. Since the pandemic means that many of us will be voting by mail, and since some states may still be counting valid ballots after election day, many experts are predicting that we may not have a final result on election night. It's important that we prepare for this possibility in advance and understand that there could be a period of intense claims and counter-claims as the final results are counted. This could be a very heated period, so we're preparing the following policies to help in the days and weeks after voting ends:
 - We'll use the Voting Information Center to prepare people for the possibility that it may take a while to get official results. This information will help people understand that there is nothing illegitimate about not having a result on election night.
 - We're partnering with Reuters and the National Election Pool to provide authoritative information about election results. We'll show this in the Voting Information Center so it's easily accessible, and we'll notify people proactively as results become available. Importantly, if any candidate or campaign tries to declare victory before the results are in, we'll add a label to their post educating that official results are not yet in and directing people to the official results.
 - We will attach an informational label to content that seeks to delegitimize the outcome of the election or discuss the legitimacy of voting methods, for example, by claiming that lawful methods of voting will lead to fraud. This label will provide basic authoritative information about the integrity of the election and voting methods.

We'll enforce our violence and harm policies more broadly by expanding our definition of high-risk people to include election officials in order to help prevent any attempts to pressure or harm them, especially while they're fulfilling their critical obligations to oversee the vote counting.

- We've already strengthened our enforcement against militias, conspiracy networks like QAnon, and other groups that could be used to organize violence or civil unrest in the period after the elections. We have already removed thousands of these groups and removed even more from being included in our recommendations and search results. We will continue to ramp up enforcement against these groups over the coming weeks.

It's important to recognize that there may be legitimate concerns about the electoral process over the coming months. We want to make sure people can speak up if they encounter problems at the polls or have been prevented from voting, but that doesn't extend to spreading misinformation. We'll enforce the policies I outlined above as well as all our existing policies around voter suppression and voting misinformation, but to ensure there are clear and consistent rules, we are not planning to make further changes to our election-related policies between now and the official declaration of the result.

In addition to all of this, four years ago we encountered a new threat: coordinated online efforts by foreign governments and individuals to interfere in our elections. This threat hasn't gone away. Just this week, we took down a network of 13 accounts and 2 pages that were trying to mislead Americans and amplify division. We've invested heavily in our security systems and now have some of the most sophisticated teams and systems in the world to prevent these attacks. We've removed more than 100 networks worldwide engaging in coordinated inauthentic behavior over the past couple of years, including ahead of major democratic elections. However, we're increasingly seeing attempts to undermine the legitimacy of our elections from within our own borders.

I believe our democracy is strong enough to withstand this challenge and deliver a free and fair election -- even if it takes time for every vote to be counted. We've voted during global pandemics before. We can do this. But it's going to take a concerted effort by all of us -- political parties and candidates, election authorities, the media and social networks, and ultimately voters as well -- to live up to our responsibilities. We all have a part to play in making sure that the democratic process works, and that every voter can make their voice heard where it matters most -- at the ballot box.

All the best,

Will Castleberry
Facebook Public Policy





KARL A. RACINE
ATTORNEY GENERAL
DISTRICT OF COLUMBIA



KWAME RAOUL
ATTORNEY GENERAL
THE STATE OF ILLINOIS



GURBIR S. GREWAL
ATTORNEY GENERAL
THE STATE OF NEW JERSEY

August 5, 2020

Mark Zuckerberg, Chairman & Chief Executive Officer
Sheryl Sandberg, Chief Operating Officer
Facebook, Inc.
1 Hacker Way
Menlo Park, California 94025

Dear Mr. Zuckerberg & Ms. Sandberg:

We, the undersigned State Attorneys General, write to request that you take additional steps to prevent Facebook from being used to spread disinformation and hate and to facilitate discrimination. We also ask that you take more steps to provide redress for users who fall victim to intimidation and harassment, including violence and digital abuse.

Our nation is in the midst of a reckoning on issues of racial justice and civil rights. As State Attorneys General, we have witnessed firsthand how the country's longstanding undercurrent of discrimination has burst into the open, as reports of hate crimes and bias incidents of all kinds have dramatically increased in recent years.¹ And while recent events have further highlighted the systemic injustice that persists in our society, the last few months also have seen millions of Americans join together to call for action against bias and racism.

As you know, Facebook is not immune to these problems. Although Facebook has made some progress in counteracting the use of its platform to dehumanize and demean, that is just the beginning of what is necessary.² Private parties, organized groups, and public officials continue to use Facebook to spread misinformation and project messages of hate against different groups

¹ See Adeel Hassan, "Hate-Crime Violence Hits 16-Year High, F.B.I. Reports," *The New York Times* (Nov. 12, 2019), <https://www.nytimes.com/2019/11/12/us/hate-crimes-fbi-report.html>; Press Release, AG Grewal Releases Preliminary Number of Reported Bias Incidents in New Jersey in 2019, Showing 65 Percent Increase Over 2018 (Jan. 13, 2020), <https://www.nj.gov/oag/newsreleases20/pr20200113c.html>.

² See Laura W. Murphy & Megan Cacace, *Facebook's Civil Rights Audit – Final Report* (July 8, 2020), <https://about.fb.com/wp-content/uploads/2020/07/Civil-Rights-Audit-Final-Report.pdf>.

of Americans. In many cases, these messages lead to intimidation and harassment of particular individuals online.

According to recent surveys, more than forty percent of Americans have experienced some form of online harassment, including cyberstalking, doxing (maliciously publishing someone's personal information), and swatting (filing false police reports to prompt a law enforcement response targeting the victim).³ Of those Americans who report having been harassed online, more than three-quarters have reported being harassed on Facebook.⁴ Much of that harassment is focused on characteristics protected by the civil rights laws that many of us are charged with enforcing, including race, religion, ethnicity, sexual orientation, gender and gender identity, and disability.⁵ Recourse is unavailable for too many of these victims, due to limitations on the services that Facebook offers victims and other impediments to securing relief through civil lawsuits or criminal prosecutions.

We understand that Facebook has committed to the public and its users that it will “invest billions of dollars each year to keep [Facebook’s] community safe and continuously work with outside experts to review and update [Facebook’s] policies.”⁶ But, as the most recent Civil Rights Audit reveals, the steps you have taken thus far have fallen short. With the vast resources at your disposal, we believe there is much more that you can do to prevent the use of Facebook as a vehicle for misinformation and discrimination, and to prevent your users from being victimized by harassment and intimidation on your platforms.

As State Attorneys General, we are responsible for protecting the safety and wellbeing of all the communities we serve. As part of that mission, we must constantly contend with the impacts of online hate, intimidation, and harassment. Many of our offices enforce the laws that protect our residents from bias offenses, intimidation, and harassment—whether online or on our streets.⁷ And many of our offices include units dedicated to serving the victims of unlawful conduct, including helping them access and use tools that allow them to vindicate their rights.

As part of our responsibilities to our communities, Attorneys General have helped residents navigate Facebook’s processes for victims to address abuse on its platform. While Facebook has—on occasion—taken action to address violations of its terms of service in cases where we have helped elevate our constituents’ concerns,⁸ we know that everyday users of Facebook can

³ See Maeve Duggan, Pew Research Center, *Online Harassment 2017* (July 11, 2017), https://www.pewresearch.org/internet/wp-content/uploads/sites/9/2017/07/PI_2017.07.11_Online-Harassment_FINAL.pdf; Anti-Defamation League, *Online Hate and Harassment: The American Experience 2020*, at 7, <https://www.adl.org/media/14643/download>.

⁴ *Online Hate and Harassment* at 15.

⁵ *Ibid.*

⁶ Live post on Mark Zuckerberg’s Facebook Profile (June 26, 2020 at 1:49 p m.), <https://www.facebook.com/zuck/videos/10112048862145471/>.

⁷ See Press Release, Attorney General Fox Intervenes in Neo-Nazi Intimidation Case (May 15, 2018), <https://dojmt.gov/attorney-general-fox-intervenes-in-neo-nazi-intimidation-case/>.

⁸ See Press Release, Division on Civil Rights Calls on Facebook to Monitor Comments on Group Page Encouraging Violence Against Orthodox Jews in Ocean County (Apr. 5, 2019), <https://www.nj.gov/oag/newsreleases19/pr20190405a.html>; Press Release: “Joint Statement by Governor Murphy and Attorney General Gurbir Grewal on Facebook’s Removal of Anti-Semitic, Racist Group Page,” (Feb. 4, 2020), <https://www.nj.gov/governor/news/news/562020/20200205b.shtml>.

find the process slow, frustrating, and ineffective. Thus, we write to highlight positive steps that Facebook can take to strengthen its policies and practices. We hope to work with you to ensure that fewer individuals suffer online harassment and discrimination, and that it is quickly and effectively addressed when they do.

Based on our collective experience, we believe that Facebook should take additional actions including the following steps—many of which are highlighted in Facebook’s recent Civil Rights Audit—to strengthen its commitment to civil rights and fighting disinformation and discrimination:

- **Aggressively enforce Facebook policies against hate speech and organized hate organizations:** Although Facebook has developed policies against hate speech and organizations that peddle it, we remain concerned that Facebook’s policies on Dangerous Individuals and Organizations, including but not limited to its policies on white nationalist and white supremacist content, are not enforced quickly and comprehensively enough.⁹ Content that violates Facebook’s own policies too often escapes removal just because it comes as coded language, rather than specific magic words. And even where Facebook takes steps to address a particular violation, it often fails to proactively address the follow-on actions by replacement or splinter groups that quickly emerge.
- **Allow public, third-party audits of hate content and enforcement:** To gauge the ongoing progress of Facebook’s enforcement efforts, independent experts should be permitted access to the data necessary to conduct regular, transparent third-party audits of hate and hate-related misinformation on the platform, including any information made available to the Global Oversight Board. As part of this effort, Facebook should capture data on the prevalence of different forms of hate content on the platform, whether or not covered by Facebook’s own community standards, thus allowing the public to determine whether enforcement of anti-hate policies differs based on the type of hate content at issue.
- **Commit to an ongoing, independent analysis of Facebook’s content population scheme and the prompt development of best practices guidance:** By funneling users toward particular types of content, Facebook’s content population scheme, including its algorithms, can push users into extremist online communities that feature divisive and inflammatory messages, often directed at particular groups. Although Facebook has conducted research and considered programs to reduce this risk, there is still no mandatory guidance for coders and other teams involved in content population. Facebook should commit to an ongoing, independent analysis of its content population scheme, including its algorithms, and also continuously implement mandatory protocols as best practices are identified to curb bias and prevent recommendations of hate content and groups.
- **Expand policies limiting inflammatory advertisements that vilify minority groups:** Although Facebook currently prohibits ads that claim that certain people, because of their membership in a protected group, pose a threat to the physical safety of communities or the nation, its policies still allow attacks that characterize such groups as threats to national culture or values.¹⁰ The current prohibition should be expanded to include such ads.

⁹ See Tech Transparency Project, *White Supremacist Groups Are Thriving on Facebook* (May 21, 2020), <https://www.techtransparencyproject.org/articles/white-supremacist-groups-are-thriving-on-facebook>.

¹⁰ See *Civil Rights Audit* at 23 (noting that advertisers could still “claim[] a religious group poses a threat to the ‘American way of life’”).

We also recommend the following measures to improve the supportive services that Facebook offers to users who have been or may become victims of harassment and intimidation on its platforms:

- **Offer live real-time assistance:** Facebook users can report intimidation and harassment but cannot immediately engage a Facebook employee who can promptly address issues that are occurring in real time. Victims of intimidation and harassment would benefit from more immediate access to Facebook employees who can offer prompt assistance. For example, if a user is being doxed, live assistance could help stop the spread of the user's personal information before the damage cannot be undone.
- **Make information about harassment and intimidation more readily available:** Facebook should facilitate evidence preservation and cooperate with victims and law enforcement agencies seeking evidence to prove a case of harassment or intimidation, such as cyberstalking or non-consensual distribution of intimate imagery, when the offenders use Facebook to perpetrate their crimes.
- **Strengthen filtering, reporting, and blocking tools:** Facebook allows users to block individual people, but users should have stronger tools and more choices for filtering out and reporting hateful, intimidating, and harassing content they do not want to see in their feeds. For example, if members of a Facebook group are engaged in an organized campaign of harassment against a single user, the victim should be able to block all members of the group and report batches of posts or users without having to block or report each individually.

We urge Facebook to take these steps to better tackle hate in our society, and address the interests of users who are victimized by others in the online community that Facebook has built.

Sincerely,



GURBIR S. GREWAL
New Jersey Attorney General



KARL A. RACINE
District of Columbia Attorney General



KWAME RAOUL
Illinois Attorney General



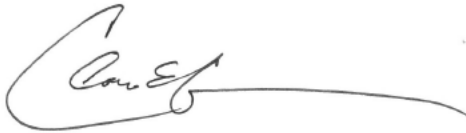
XAVIER BECERRA
California Attorney General



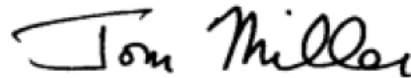
WILLIAM TONG
Connecticut Attorney General



KATHLEEN JENNINGS
Delaware Attorney General



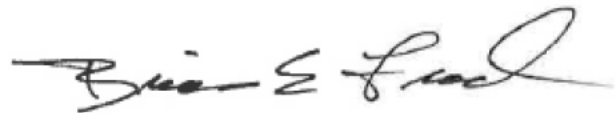
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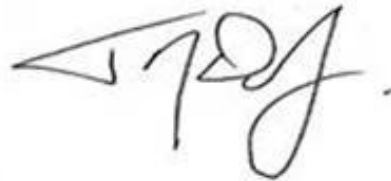
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From: [Will Castleberry](#)
To: [Diamond, Joshua](#)
Subject: Hey Josh
Date: Friday, August 14, 2020 4:08:15 PM

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Hope all is well. I have a bad number of you. Can you please give me a quick call? It won't take 5.

All the best,

Will Castleberry
Facebook Public Policy

