

WILMERHALE

October 31, 2019

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VIA ELECTRONIC MAIL

Mr. Jeff S. Jordan
Assistant General Counsel
Office of Complaints Examination & Legal Administration
Federal Election Commission
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

Re: MUR 7641 — Response of Facebook, Inc.

Dear Mr. Jordan:

This letter is submitted on behalf of our client, Facebook, Inc. (“Facebook”), in response to the complaint filed in the above-captioned matter under review.

The complaint alleges that Facebook’s inclusion of links to particular third-party responses to user posts “constitutes unreported, in-kind campaign contributions” by Facebook. It asserts—without any legal or factual support—that Facebook’s inclusion of such “counterposts” on its platform is an “attempt to assist a political candidate in his or her campaign.” The single-paragraph complaint does not articulate any specific grounds for treating these links to third-party Internet posts as in-kind contributions by the company—and there are none. Accordingly, the Federal Election Commission (“FEC” or the “Commission”) should find no reason to believe a Federal Election Campaign Act of 1971 (“FECA” or the “Act”) violation occurred and close the matter under review without further action.

In the absence of any specific factual allegations or legal arguments, the only conceivable theory of the complaint is that the counterposts are “coordinated communications”¹ or, more

¹ 52 U.S.C. § 30116(a)(7)(B) (expenditures will be treated as in-kind contributions when made “by any person in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate, his authorized political committees, or their agents”); 11 C.F.R. § 109.21(a), (b)(1) (a payment for a communication “coordinated with a candidate, an authorized committee, a political party committee, or an agent of any of the foregoing” is an in-kind contribution to the candidate or the political party committee).

Mr. Jeff S. Jordan
October 31, 2019

Page 2

generally, that Facebook included them on its platform “for the purpose of influencing [an] election for Federal office.”²

These theories are fundamentally flawed for two independent reasons, either of which is sufficient to dispose of the complaint. *First*, the third-party posts are not “coordinated communications” under 11 C.F.R. § 109.21(a). In particular, they are neither “electioneering communications” nor “public communications,” and the complaint does not allege any coordination between Facebook and any campaign. *Second*, the third-party posts were not included on the Facebook platform “for the purpose of influencing any election for Federal office.” The posts were neither written nor specifically requested by Facebook. The posts do not include any express advocacy or any solicitation of funds, and instead are part of Facebook’s broader, well-publicized effort to combat misinformation on its platform for independent business reasons. The posts were written and published by independent third parties that participate in Facebook’s fact-checking program—a program that extends far beyond the political arena to address a broad range of Internet hoaxes, including misinformation regarding matters of public health and safety.

The allegations in this complaint are insufficient, lack substance, and fail to identify any violation of the Act. Accordingly, the Commission should find no reason to believe that Facebook violated the FECA as alleged in the MUR 7641 complaint; in the alternative, the Commission should exercise its discretion to dismiss the complaint with no further action on the ground that it does not warrant further expenditure of Commission resources.

FACTUAL BACKGROUND

The complaint concerns three Internet posts by third parties on Facebook’s social media platform. The posts at issue were made in response to two posts by Facebook users, which third-party organizations independently opted to fact check as part of Facebook’s broader and well-publicized program to combat misinformation on its platform. As the company has explained, “misinformation is bad for our community and bad for our business” and it has devoted considerable resources to addressing it.³ Facebook began its formal third-party fact-checking program in the United States in December 2016; since then, the program has grown to include dozens of third-party fact-checking organizations in countries around the world.⁴ According to one academic study, there has been a measurable reduction in the amount of misinformation on

² 52 U.S.C. § 30101(8)(A)(i) (a “contribution” includes “any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office”); 11 C.F.R. § 100.52(d)(1) (the term “anything of value includes all in-kind contributions”).

³ See Exhibit A, *Hard Questions: How Is Facebook’s Fact-Checking Program Working?*, FACEBOOK NEWSROOM (June 14, 2018), <https://newsroom.fb.com/news/2018/06/hard-questions-fact-checking/>.

⁴ *Id.*; see also Exhibit B, *Fact-Checking on Facebook: What Publishers Should Know*, FACEBOOK BUSINESS: MEDIA AND PUBLISHER HELP, <https://www.facebook.com/help/publisher/18222309230722>.

Mr. Jeff S. Jordan
October 31, 2019

Page 3

Facebook since the company began to take affirmative steps to combat it.⁵ Another academic study found that “efforts by Facebook following the 2016 election to limit the diffusion of misinformation may have had a meaningful impact.”⁶

Facebook has publicly explained how its third-party fact checking program operates. The first step is to identify potentially false material posted by users or pages on its platform. That step is largely automated and relies on computer programs that make predictions about whether content may be misinformation based on a range of signals—e.g., whether the comments on the post include phrases that indicate readers do not believe the content is true, whether Facebook users have affirmatively marked the post as false news, and whether the post is being shared by a page that has spread false news before.⁷ If this process identifies a post as potentially false, the post is placed into a digital queue and made available for review by independent third-party fact-checkers. Those independent fact-checkers select content to review, independently rate the content’s accuracy, and independently write an article (or link to one of their prior articles) explaining how they arrived at their rating.⁸ If a fact-checker identifies a story as containing false content, a Facebook feature called “Related Articles” will automatically display the fact-checker’s rating article immediately below Facebook users’ posts that include the same content.⁹

⁵ See Paul Resnick, Aviv Ovadya, Garlin Gilchrist, *Iffy Quotient: A Platform Health Metric for Misinformation*, UNIV. OF MICHIGAN, SCHOOL OF INFORMATION CENTER FOR SOCIAL MEDIA RESPONSIBILITY (Oct. 10, 2018), <https://csmr.umich.edu/wp-content/uploads/2019/07/UMSI-CSMR-Iffy-Quotient-Whitepaper-v2.pdf> (“On Facebook, there has been a clear downward trend since about March of 2017, with the Iffy Quotient in July 2019 much lower than it was even in early 2016”).

⁶ See Hunt Allcott, Matthew Gentzkow, Chuan Yu, *Trends in the Diffusion of Misinformation on Social Media*, STANFORD INSTITUTE FOR ECONOMIC POLICY RESEARCH (Oct. 2018), <https://web.stanford.edu/~gentzkow/research/fake-news-trends.pdf>.

⁷ See Exhibit C, *How People Help Fight False News*, FACEBOOK NEWSROOM (June 21, 2018), <https://newsroom.fb.com/news/2018/06/inside-feed-how-people-help-fight-false-news/> (“Facebook uses a machine learning classifier to compile all of those misinformation signals and — by comparing a given post to past examples of false news — make a prediction: ‘How likely is it that a third-party fact-checker would say this post is false?’ . . . The classifier’s predictions are then used to determine whether a given piece of content should be sent to third-party fact-checkers.”).

⁸ See Exhibit A, *supra* note 3.

⁹ See Exhibit D, *Hard Questions: What’s Facebook’s Strategy for Stopping False News?*, FACEBOOK NEWSROOM (May 23, 2018), <https://newsroom.fb.com/news/2018/05/hard-questions-false-news/>. Additionally, over the next month, content across Facebook that has been rated false by a third-party fact-checker will start to be more prominently labeled. The new labels will be shown on top of false and partly false photos and videos, and will link out to the assessment from the fact-checker. See Exhibit E, *Helping to Protect the 2020 US Elections*, FACEBOOK NEWSROOM (Oct. 21, 2019), <https://newsroom.fb.com/news/2019/10/update-on-election-integrity-efforts/>.

Mr. Jeff S. Jordan
October 31, 2019

Page 4

The third-party organizations conducting the fact-checking are independent from Facebook and certified through the non-partisan International Fact-Checking Network (“IFCN”), which evaluates applicants based on a set of criteria including “nonpartisanship and fairness,” “transparency of sources,” “transparency of funding and organization,” “transparency of methodology,” and an “open and honest corrections policy.”¹⁰ Agreeing to the IFCN’s code of conduct is a prerequisite for participating in Facebook’s third-party fact-checking program and receiving compensation thereunder.¹¹

Facebook’s fact-checking partners in the United States currently include The Associated Press, Check Your Fact, FactCheck.org, Lead Stories, PolitiFact, and Science Feedback.¹²

Facebook posts queued for fact-checking review are not limited to political subjects; they encompass misinformation on a broad range of topics.¹³ For example, the following claims have been fact-checked (and rated as “false”) by third parties as part of this program:

- that it is possible to save a person having a stroke by using a needle to prick their finger and draw blood;¹⁴
- that NASA would pay volunteers up to \$100,000 to participate in 60-day “bed rest studies”;¹⁵ and
- that a photographed girl was not a genuine survivor of an attack on Aleppo, Syria, but rather was an actor posing as a victim in multiple incidents.¹⁶

¹⁰ See *International Fact-Checking Network fact-checkers’ code of principles*, POYNTER, <https://www.poynter.org/ifcn-fact-checkers-code-of-principles/>.

¹¹ *Id.*

¹² See Exhibit B, *supra* note 4.

¹³ See Exhibit F, *Expanding Fact-Checking to Photos and Videos*, FACEBOOK NEWSROOM (Sept. 13, 2018), <https://newsroom.fb.com/news/2018/09/expanding-fact-checking/>.

¹⁴ See Exhibit G, *Increasing Our Efforts to Fight False News*, FACEBOOK NEWSROOM (June 21, 2018), <https://newsroom.fb.com/news/2018/06/increasing-our-efforts-to-fight-false-news/>.

¹⁵ See Exhibit H, *The Hunt for False News*, FACEBOOK NEWSROOM (Oct. 19, 2018), <https://newsroom.fb.com/news/2018/10/inside-feed-hunt-false-news-october-2018/>.

¹⁶ See Exhibit F, *supra* note 13.

Mr. Jeff S. Jordan
October 31, 2019

Page 5

And to the extent posts from the political arena are selected for third-party fact-checking, they span the political spectrum.¹⁷

The complaint cites two examples of user posts subjected to fact-checking as part of this program. In response to a photo posted on Facebook identifying its subject as Rep. Beto O'Rourke, two independent organizations, FactCheck.org and Lead Stories, each published articles explaining that the photo was not, in fact, of Mr. O'Rourke.¹⁸ And in response to a link posted by a Facebook user to an article claiming that Rep. Ilhan Omar was proposing a tax on pork products, Lead Stories published an article explaining that the earlier piece was satirical.¹⁹ As shown in the complaint, links to these fact-checking articles were displayed as "Related Articles" below Facebook posts containing the false content.

LEGAL STANDARD

The Act requires that the Commission find "reason to believe that a person has committed, or is about to commit," a FECA violation as a precondition to opening an investigation into the alleged violation. 52 U.S.C. § 30109(a)(2). As the Commission has explained: "The Commission may find 'reason to believe' *only if* a complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the FECA."²⁰ The Commission has repeatedly found no

¹⁷ See, e.g., Angelo Fichera, *Trumps Didn't Take Seats for Disabled at U.N.*, FACTCHECK.ORG (Sept. 25, 2019), <https://www.factcheck.org/2019/09/trumps-didnt-take-seats-for-disabled-at-u-n/>; Daniel Funke, *Donald Trump did not credit Florida Gov. Ron DeSantis for Hurricane Dorian's path*, POLITIFACT (Sept. 6, 2019), <https://www.politifact.com/facebook-fact-checks/statements/2019/sep/06/facebook-posts/donald-trump-did-not-credit-florida-gov-ron-desant/>; Angelo Fichera, *Viral Quote Falsely Attributed to McCarthy*, FACTCHECK.ORG (Aug. 22, 2019), <https://www.factcheck.org/2019/08/viral-quote-falsely-attributed-to-mccarthy/>.

¹⁸ See Angelo Fichera, *Viral Image Does Not Show O'Rourke*, FACTCHECK.ORG (Mar. 15, 2019), <https://www.factcheck.org/2019/03/viral-image-does-not-show-orourke/>; Alan Duke, *Fake News: Young Beto O'Rourke NOT Photographed With "Feminist Atheist Vegan Naturist Ecologist Queer Slut" Written On Body*, LEAD STORIES (Mar. 17, 2019), <https://hoax-alert.leadstories.com/3470267-fake-news-70.html>.

¹⁹ See Maarten Schenk, *Fake News: Ilhan Omar Did NOT Propose Tax on Pork Products 'So Costly Nobody Will Buy Them Anymore'*, LEAD STORIES (May 27, 2019), <https://hoax-alert.leadstories.com/3470532-fake-news-ilhan-omar-proposes-tax-on-pork-products-so-costly-nobody-will-buy-them-anymore.html>.

²⁰ MUR 4960 (Hillary Rodham Clinton For U.S. Senate Exploratory Committee, *et al.*), Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith and Scott E. Thomas, at 1-2 (emphasis added); see also MUR 5467 (Michael Moore), First General Counsel's Report, at 5 (citing MUR 4960) ("Purely speculative charges, especially when accompanied by a direct refutation, do not form an adequate basis to find a reason to believe that a violation of the FECA has occurred.").

Mr. Jeff S. Jordan
October 31, 2019

Page 6

reason to believe FECA violations occurred to dispose of complaints that do not allege specific facts sufficient to establish a violation.²¹

The Commission has further clarified that “[u]nwarranted legal conclusions from asserted facts, ... or mere speculation, ... will not be accepted as true.”²² “The burden of proof does not shift to a respondent merely because a complaint is filed.”²³ The Commission has suggested that “threadbare” and “vague” complaints are insufficient to meet the “reason to believe” standard, reasoning that if the Commission did not require citations to specific facts, “complainants could assume that, the more vague their complaints, the more potential violations the Commission could identify, and the less chance respondents would have to adequately address those potential violations.”²⁴ The “reason to believe” standard “does not permit a complainant to present mere allegations that the Act has been violated and request that the Commission undertake an investigation to determine whether there are facts to support the charges.”²⁵

In addition, the Commission has discretion to dismiss complaints that do not warrant further expenditure of Commission resources.²⁶ Criteria for allocating agency resources and assessing whether particular matters warrant further administrative enforcement proceedings include: (1) the gravity of the alleged violation, taking into account both the type of activity and the amount in violation; (2) the apparent impact the alleged violation may have had on the electoral

²¹ See, e.g., MUR 7169 (Democratic Congressional Campaign Committee, *et al.*), Factual and Legal Analysis, at 11 (rejecting complaints alleging an excessive in-kind contribution where “the Complaints do not allege specific facts that are sufficient to provide reason to believe that the conduct prong has been satisfied.”); MUR 6821 (Shaheen for Senate, *et al.*), Factual and Legal Analysis, at 7-8 (finding no reason to believe there had been a “coordinated communication” where the Complaint “fails to identify any communication” between the relevant parties); MUR 5754 (MoveOn.org Voter Fund), Factual and Legal Analysis, at 3 (finding “the complaint does not contain sufficient information on which to base an investigation” into whether the conduct standard was met where it “doesn’t even specifically identify which ‘conduct’ standard would apply to the activity complained of” and “does not connect any such discussions” to any alleged coordinated communications).

²² *Id.* at 2.

²³ MUR 4850 (Deloitte & Touche, LLP, *et al.*), Statement of Reasons of Chairman Darryl R. Wold and Commissioners David M. Mason, and Scott E. Thomas, at 2.

²⁴ MUR 6056 (Protect Colorado Jobs, Inc.), Statement of Reasons of Vice-Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Donald F. McGahn II, at 10.

²⁵ *Id.* at 6 n.12.

²⁶ *Heckler v. Chaney*, 470 U.S. 821 (1985); MUR 6794 (Emmer for Congress), Factual and Legal Analysis, at 4 (dismissing a complaint alleging that an advertisement was an in-kind contribution as a matter of prosecutorial discretion “in furtherance of the Commission’s priorities relative to other matters pending on the Enforcement docket”).

Mr. Jeff S. Jordan
October 31, 2019

Page 7

process; (3) the complexity of the legal issues raised in the matter; and (4) recent trends in potential violations and other developments in the law.²⁷

ARGUMENT

I. The Third-Party Fact-Checking Posts Identified In The Complaint Are Not Coordinated Communications Under 11 C.F.R. § 109.21(a)

Commission regulations establish a three-prong test to determine whether a communication qualifies as a “coordinated communication” that constitutes an in-kind contribution.²⁸ First, the communication must be paid for by someone other than a candidate, a candidate’s authorized committee, a political party committee, or their authorized agents (the “payment prong”).²⁹ Second, the communication must satisfy one of the content standards in the Commission regulations (the “content prong”).³⁰ Third, the communication must satisfy one of the conduct standards in the Commission regulations (the “conduct prong”).³¹ A communication qualifies as a “coordinated communication” only if all three prongs are satisfied. Here, even if one assumes the payment prong is met, the complaint fails to set forth *any* facts that would satisfy either the content or conduct prongs, let alone both of them. Accordingly, there is no basis for concluding that a “coordinated communication” has occurred.

A. The Third-Party Posts Are Neither “Electioneering Communications” Nor “Public Communications”

The third-party posts identified in the complaint do not satisfy the “content prong” of the “coordinated communication” regulations because they are neither “electioneering communications”³² nor “public communications.”³³ This is dispositive: A “coordinated communication” exists under Commission regulations only when all three prongs are satisfied. Because the communications cannot satisfy the content prong as a matter of law, they cannot qualify as “coordinated communications.”

²⁷ See, e.g., MUR 7617 (Supporters of Judy Herschel, *et al.*), EPS Dismissal Report, at 1-2; MUR 7604 (Friends of Vangie Williams, *et al.*), EPS Dismissal Report, at 1-2.

²⁸ 11 C.F.R. § 109.21(b)(1).

²⁹ 11 C.F.R. § 109.21(a)(1).

³⁰ 11 C.F.R. §§ 109.21(a)(2), (c).

³¹ 11 C.F.R. §§ 109.21(a)(3), (d).

³² 11 C.F.R. § 109.21(c)(1).

³³ 11 C.F.R. §§ 109.21(c)(2)-(5).

Mr. Jeff S. Jordan
October 31, 2019

Page 8

1. The Third-Party Fact-Checking Posts Are Not “Electioneering Communications”

An electioneering communication is “any broadcast, cable, or satellite communication” that refers to a clearly identified candidate for federal office, is publicly distributed within certain timeframes, and, in the case of a candidate for the United States Senate or House of Representatives, is targeted to the relevant electorate.³⁴ Facebook’s third-party fact-checking program is not subject to the Commission’s rules on “electioneering communications” because those regulations apply only to activity on traditional broadcast media and do not extend to Internet communications. The posts that are the subject of the complaint were all on Facebook’s online social media platform, and the complaint makes no allegation that Facebook made a “broadcast, cable, or satellite communication.” In addition, electioneering communications must, by definition, be made within 30 days of a primary election or 60 days of a general election.³⁵ The complaint does not allege that Facebook made any post within such a window. The posts attached to the complaint referencing Beto O’Rourke and Ilhan Omar were made in the spring of 2019, well outside the relevant timeframe for any election in which either candidate participated.

2. The Third-Party Fact-Checking Posts Are Not “Public Communications”

Certain forms of “public communication” can also satisfy the content prong. Under FECA, a “public communication” is “a communication by means of any broadcast, cable, or satellite communication, newspaper, magazine, outdoor advertising facility, mass mailing, or telephone bank to the general public, or any other form of general public political advertising.”³⁶ Commission regulations clarify this language by expressly excluding all Internet communications except for “general public political advertising” that is “placed for a fee on another person’s Web site.”³⁷ Because the complaint concerns only Internet posts on Facebook and does not allege that any organization paid Facebook to post them, they cannot qualify as “public communications.”

B. The Complaint Also Fails To Allege That There Was Coordination Between Facebook And Any Campaign

Even if a communication meets the “content prong”—and the fact-checking posts at issue here do not—Commission regulations also require a “coordinated communication” to satisfy at

³⁴ 52 U.S.C. § 30104(f)(3); 11 C.F.R. § 100.29(a)(3).

³⁵ 52 U.S.C. § 30104(f)(3)(A)(i)(II).

³⁶ 52 U.S.C. § 30101(22).

³⁷ 11 C.F.R. § 100.26.

Mr. Jeff S. Jordan
October 31, 2019

Page 9

least one of the following standards under the “conduct prong.”³⁸ Specifically, the communication must be made “at the request or suggestion” of a candidate, involve the “material involvement” of a candidate, be made “after one or more substantial discussions about the communication” with the candidate, be paid for by someone sharing a “common vendor” with the candidate, or be paid for by a “former employee or independent contractor” of the candidate.³⁹

The complaint does not allege that Facebook coordinated with any political campaigns in any of these ways with respect to the user posts cited in the complaint. As explained above, absent circumstances of the sort not alleged here, Facebook uses a machine learning classifier to identify a broad range of potentially false material that is posted on its platform.⁴⁰ The results of that identification process are automatically placed into a queue, where the material is then made available for review by independent third-party fact-checkers. Those independent fact-checkers select content to review, rate the content’s accuracy, and write an article (or link to a previously written article by the same fact-checking organization) explaining how they arrived at their rating.⁴¹ The complaint does not allege—and Facebook has not identified—any information to suggest that the fact-checking activities related to these posts involved any communication with or coordination with a campaign.

This too is dispositive: Absent any factual allegations regarding coordination between Facebook and a campaign, the third-party posts do not satisfy the “conduct” prong.⁴² This provides an additional, independent reason why they are not “coordinated communications” under Commission regulations.

³⁸ 11 C.F.R. § 109.21(d).

³⁹ 11 C.F.R. §§ 109.21(d)(1)-(6).

⁴⁰ See Exhibit C, *supra* note 7.

⁴¹ See Exhibit A, *supra* note 3.

⁴² MUR 5754 (MoveOn.org Voter Fund), Factual and Legal Analysis, at 3 (finding “the complaint does not contain sufficient information on which to base an investigation” into whether the conduct standard was met where it “doesn’t even specifically identify which ‘conduct’ standard would apply to the activity complained of” and “does not connect any such discussions” to any alleged coordinated communications).

Mr. Jeff S. Jordan
October 31, 2019

Page 10

II. The Third-Party Posts Cited In The Complaint Were Not Included On The Facebook Platform “For The Purpose Of Influencing Any Election For Federal Office”

To constitute an in-kind contribution under FECA, a communication must be “made ... for the purpose of influencing [an] election for Federal office.”⁴³ The complaint provides no basis to conclude that the third-party fact-checking posts on Facebook had such a purpose.

A. Facebook Did Not Undertake Any Activity Involving Express Advocacy Or Solicitation Of Funds Intended To Influence An Election

To determine the “purpose” of an alleged contribution, the Commission first applies a two-part test for distinguishing between political and nonpolitical intent. An activity is not a “contribution” under this test “if (1) there is an absence of any communication expressly advocating the nomination or election of the [candidate] appearing or the defeat of any other candidate, and (2) there is no solicitation, making, or acceptance of a campaign contribution for the [candidate] in connection with the event.”⁴⁴ Neither part of the test is satisfied here: The posts cited in the complaint do not expressly advocate for the O’Rourke or Omar campaigns and do not solicit a campaign contribution. Specifically, the cited posts from FactCheck.org and Lead Stories clarify that the viral image claiming to be of Rep. O’Rourke was not in fact an image of him. The cited post regarding Rep. Omar from Lead Stories debunks the claim that she was proposing a tax on pork products. These facts are sufficient to establish that Facebook has not made a “contribution” under 52 U.S.C. § 30101(8)(A)(i).

B. The “Totality Of The Circumstances” Does Not Compel A Different Result As The Third-Party Fact-Checking Program Has A “Significant Non-Election” Related Aspect

In the absence of express advocacy or a solicitation, the Commission may consider the totality of circumstances to assess whether an activity would be objectively perceived as an intentional attempt to influence an election.⁴⁵ Under this objective test, the Commission considers whether the “activity in question ... appear[s] to have any specific and significant non-election

⁴³ 52 U.S.C. § 30101(8)(A)(i); *see also* AO 1982-56 (“[A]lthough media or other public appearances (by candidates may benefit their election campaigns, the person defraying the costs of such an appearance will not be deemed to have made a contribution in-kind to the candidate absent an indication that such payments are made to influence the candidate’s election to Federal office.”).

⁴⁴ *Orloski v. FEC*, 795 F.2d 156, 160 (D.C. Cir. 1986); *see also* MUR 4305 (Forbes for President, *et al.*), Statement of Reasons of Vice Chairman Darryl R. Wold, Commissioners Lee Ann Elliott, David M. Mason and Karl J. Sandstrom, at 6; AO 1996-11; AO 1994-15; AO 1992-06; AO 1992-05; AO 1988-27, AO 1977-42.

⁴⁵ *See, e.g.*, AO 1990-05; AO 1983-12 (“The purpose and functions of an organizational entity are material and relevant to the Commission’s characterization of the underlying purpose of a specific activity or program of that entity.”).

Mr. Jeff S. Jordan
October 31, 2019

Page 11

related aspects that might distinguish it from election influencing activity.”⁴⁶ It does not make this assessment based solely on the effects of the activity.⁴⁷

Facebook has independent business reasons for seeking to minimize misinformation on its platform. It has publicly explained that misinformation on the platform “is bad for our community and bad for our business.”⁴⁸ The explicit goal of Facebook’s third-party fact-checking program is to provide users with more accurate information and context in the posts they see (including on topics entirely unrelated to politics or election activity) and to create a better user experience.⁴⁹ The program extends far beyond politics, with third-party fact-checkers responding to posts dealing with Internet hoaxes and misinformation regarding, for example, matters of public health and safety.⁵⁰

Even for those posts that arise in the political arena, Facebook operates the third-party fact-checking program on a non-partisan basis. To be eligible to participate as fact-checkers in Facebook’s program, organizations are required to be certified through the non-partisan International Fact-Checking Network, which evaluates applicants based on a set of criteria including “nonpartisanship and fairness.”⁵¹ They include well-known, nonpartisan organizations like the Associated Press and Politifact. Independent third-party fact-checkers select from a digital queue of eligible content which content to evaluate.⁵² The complaint provides no basis to conclude that the fact-checking posts it cites are attempts to influence an election: While it has identified two user posts related to Democrats, another complainant could have just as easily identified posts related to Republicans. For example, recent articles published by Facebook’s fact-checking

⁴⁶ AO 1983-12.

⁴⁷ MUR 7024 (Van Hollen for Senate, *et al.*), Factual and Legal Analysis, at 5 (“Although the outcome of these actions could potentially have had an effect on candidates in future elections, the effect on any particular candidate’s election would be too indirect and attenuated to constitute a contribution.”).

⁴⁸ See Exhibit A, *supra* note 3.

⁴⁹ See Exhibit F, *supra* note 13 (“We know that people want to see accurate information on Facebook, so for the last two years, we’ve made fighting misinformation a priority.”)

⁵⁰ See, e.g., Exhibit G, *supra* note 14 (debunking a claim that you can save a person having a stroke by using a needle to prick their finger and draw blood); Exhibit H, *supra* note 15 (debunking a claim that NASA was looking to compensate volunteers up to \$100,000 to participate in 60-day “bed rest studies”); Exhibit F, *supra* note 13 (debunking a claim that girl was not a genuine survivor of a single attack on Aleppo, Syria, but rather was an actor posing as a victim in multiple incidents).

⁵¹ See *International Fact-Checking Network fact-checkers’ code of principles*, *supra* note 10.

⁵² See Exhibit A, *supra* note 3.

WILMERHALE

Mr. Jeff S. Jordan
October 31, 2019

Page 12

partners corrected Facebook posts critical of President Trump⁵³ and House Republican Leader Kevin McCarthy.⁵⁴

III. In The Alternative, The Commission Should Exercise Its Discretion To Dismiss The Complaint

The Commission should resolve this Matter Under Review by concluding that that there is no reason to believe that a FECA violation has occurred, and it may do so on any of the three independent grounds set forth above. In the alternative, it should exercise its discretion to dismiss the complaint without further expenditure of Commission resources.

CONCLUSION

For the foregoing reasons, the Commission should find no reason to believe that Facebook violated FECA and should dismiss this matter with no further action.

Respectfully submitted,



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Adam Raviv

Jamie Yood

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⁵³ See Fichera, *Trumps Didn't Take Seats for Disabled at U.N.*, *supra* note 17; Funke, *Donald Trump did not credit Florida Gov. Ron DeSantis for Hurricane Dorian's path*, *supra* note 17.

⁵⁴ See Fichera, *Viral Quote Falsely Attributed to McCarthy*, *supra* note 17.

Appendix

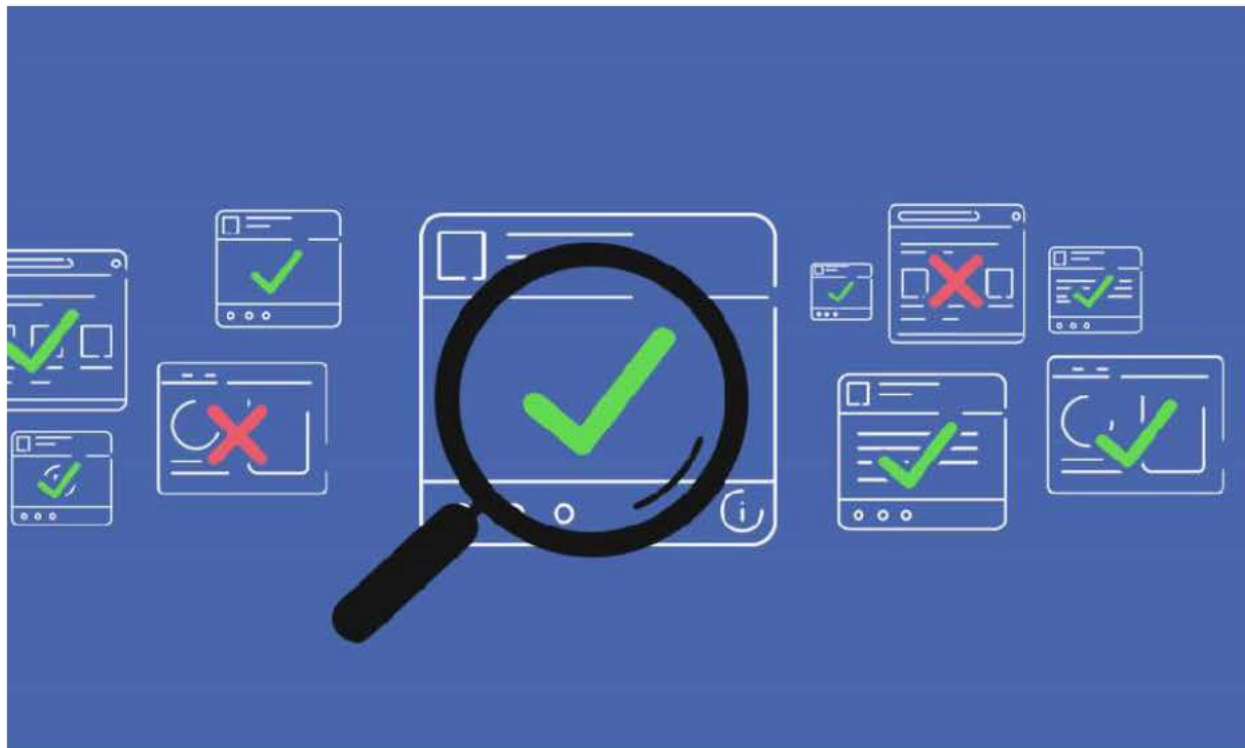
Ex.	Description
A	<i>Hard Questions: How Is Facebook's Fact-Checking Program Working?</i> , FACEBOOK NEWSROOM (June 14, 2018), https://newsroom.fb.com/news/2018/06/hard-questions-fact-checking/
B	<i>Fact-Checking on Facebook: What Publishers Should Know</i> , FACEBOOK BUSINESS: MEDIA AND PUBLISHER HELP, https://www.facebook.com/help/publisher/182222309230722
C	<i>How People Help Fight False News</i> , FACEBOOK NEWSROOM (June 21, 2018), https://newsroom.fb.com/news/2018/06/inside-feed-how-people-help-fight-false-news/
D	<i>Hard Questions: What's Facebook's Strategy for Stopping False News?</i> , FACEBOOK NEWSROOM (May 23, 2018), https://newsroom.fb.com/news/2018/05/hard-questions-false-news/
E	<i>Helping to Protect the 2020 US Elections</i> , FACEBOOK NEWSROOM (Oct. 21, 2019), https://newsroom.fb.com/news/2019/10/update-on-election-integrity-efforts/
F	<i>Expanding Fact-Checking to Photos and Videos</i> , FACEBOOK NEWSROOM (Sept. 13, 2018), https://newsroom.fb.com/news/2018/09/expanding-fact-checking/
G	<i>Increasing Our Efforts to Fight False News</i> , FACEBOOK NEWSROOM (June 21, 2018), https://newsroom.fb.com/news/2018/06/increasing-our-efforts-to-fight-false-news/
H	<i>The Hunt for False News</i> , FACEBOOK NEWSROOM (Oct. 19, 2018), https://newsroom.fb.com/news/2018/10/inside-feed-hunt-false-news-october-2018/

EXHIBIT A

facebook Newsroom

June 14, 2018

Hard Questions: How Is Facebook's Fact-Checking Program Working?



Hard Questions is a series from Facebook that addresses the impact of our products on society.

By Tessa Lyons, Product Manager

False news is a money maker for spammers and a weapon of state actors and agitators around the world. This has introduced important questions for society and new responsibilities for companies like Facebook.

Misinformation is bad for our community and bad for our business. It's why we're investing significant time and resources to fight it. As I explained in my last post, there are three main ways we're doing this:

- Removing accounts and content that violate our policies

- Reducing the distribution of false news and the financial incentives to create it
- Informing people by giving them more context on the stories they see

One part of our strategy that we get asked about a lot is our partnership with third-party fact-checking organizations. They help us identify false stories so we can stop them from spreading on Facebook. Overall, we're making progress and have learned a lot. This year we expanded to more countries and started having fact-checkers review photos and videos, not just links. We're also looking for more ways to be transparent about these efforts and to have independent researchers [measure](#) our results.

This program is just one part of our strategy, and we won't be able to address this problem with human fact-checkers alone. Still, I wanted to share more on our work and the challenges ahead.

How Third-Party Fact-Checking Works

We started the third-party fact-checking program in [December 2016](#). Now we have [25 partners in 14 countries](#), many with recent or upcoming elections. Our partners are independent and [certified](#) through the non-partisan International Fact-Checking Network. When fact-checkers rate an article as false, we show it lower in News Feed — reducing future views by over 80% on average.

Here's how it works:

- **We use technology to identify potentially false stories.** For example, when people on Facebook [submit feedback](#) about a story being false or comment on an article expressing disbelief, these are signals that a story should be reviewed. In the US, we can also use machine learning based on past articles that fact-checkers have reviewed. And recently we gave fact-checkers the option to proactively identify stories to rate.
- **Fact-checkers provide a rating and reference article.** Independent third-party fact-checkers review the stories, [rate their accuracy](#), and write an article explaining the facts behind their rating.
- **We demote links rated false and provide more context on Facebook.** If a story is rated false, we reduce its distribution in News Feed. (See more on [how News Feed ranking works](#).) We let people who try to share the story know there's more reporting on the subject, and we notify people who shared it earlier. We also show the fact-checker's reference article in [Related Articles](#) immediately below the story in News Feed.
- **We take action against repeat offenders.** If a Facebook Page or website repeatedly shares misinformation, we'll reduce the overall distribution of the Page or website, not just individual false articles. We'll also cut off their ability to [make money](#) or [advertise](#) on our services.

The Limits of Fact-Checking

Over the last 18 months we've made good progress, but we're also aware of the limits of this program. Fact-checkers don't exist in all countries, and different places have different standards of journalism as well as varying levels of press freedom. Even where fact-checking organizations do exist, there aren't enough to review all potentially false claims online. It can take hours or even days to review a single claim. And most false claims aren't limited to one article — they spread to other sites. To make real progress, we have to keep improving our machine learning and trying other tactics that can work around the world.

There are other challenges, too, such as how to treat opinion and satire. We strongly believe that people should be able to debate different ideas, even controversial ones. We also recognize there can be a fine line between misinformation and satire or opinion. For example, sometimes people try to call their sites "satire" as cover for their true motivation — to spread fake stories. This can make it more difficult for fact-checkers to assess whether an article should be rated "false" or left alone.

“

We strongly believe that people should be able to debate different ideas, even controversial ones.

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Another question is what to do when publishers want to challenge a decision — especially after their article has already reached a lot of people. We allow publishers to contact fact-checkers to dispute their rating or offer a correction in order to restore their distribution in News Feed. If a fact-checker accepts the correction or changes their rating, we'll remove the strike against a publisher. Our goal here is to prevent bad actors from exploiting loopholes without unduly punishing reputable publications that sometimes make mistakes.

And ultimately, it's important that people trust the fact-checkers making these calls. While we work with the International Fact-Checking Network to approve all our partners and make sure they have high standards of accuracy, fairness and transparency, we continue to face accusations of bias. Which has left people asking, in today's world, is it possible to have a set of fact-checkers that are widely recognized as objective? We've also made some [changes](#) to how we let people know that a story is disputed so that they can learn more and come to their own conclusions.

It's clear that even as we continue to improve this program, we need solutions beyond fact-checkers. That's why we're also working on removing fake accounts, which are often responsible for misinformation. And as we make it harder for fake stories to spread and we prevent malicious sites and Pages from using our tools to make money, we will break the business models that incentivize bad actors to share it. We also continue to invest in news literacy programs to help people better judge the publishers and articles they see on Facebook. It's through the combination of all these things — and by collaborating with other companies and organizations — that we'll be able to continue to make progress on false news.

Category: [Hard Questions](#) · [Integrity and Security](#)

Tags: [False News](#)

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EXHIBIT B

 Last updated: Oct 24, 2019

Fact-Checking on Facebook: What Publishers Should Know

We're committed to [fighting the spread of false news](#) on Facebook. In [certain countries](#) and regions we work with [third-party fact-checkers](#) who are [certified](#) through the non-partisan International Fact-Checking Network to help identify and review false news.

Q: HOW DO WE REDUCE THE DISTRIBUTION OF FALSE NEWS?

- **Identifying false news:** we identify news that may be false using signs like feedback from people on Facebook. Fact-checkers may also identify stories to review on their own.
- **Reviewing content:** fact-checkers will review content, check their facts, and [rate their accuracy](#).
- **Showing false content lower in News Feed:** if a fact-checker rates content as false, it will appear lower in News Feed. This significantly reduces the number of people who see it.
- **Taking action against repeat offenders:** Pages and websites that repeatedly share false news will have some restrictions, including having their distribution reduced. They may also have their ability to monetize and advertise removed, and their ability to register as a news Page removed.

Learn about [fact-checking on Facebook](#) or see below for FAQs that are relevant to publishers.

Q: WHO ARE FACEBOOK'S THIRD-PARTY FACT-CHECKING PARTNERS?

A: We work with many third-party fact-checkers [certified](#) through a non-partisan International Fact-Checking Network. See table below.

Q: WHAT CONTENT IS ELIGIBLE FOR FACT-CHECKING?

A: Fact-checkers can review and rate public, newsworthy Facebook posts, including ads, with articles, photos, or videos.

Q: HOW DOES THIS APPLY TO POSTS AND ADS FROM POLITICIANS?

A. Posts and ads from politicians are generally not subjected to fact-checking. In evaluating when this applies we ask our fact-checking partners to look at politicians at every level. This means candidates running for office, current office holders - and, by extension, many of their cabinet appointees - along with political parties and their leaders. In some cases, we ask fact-checkers to use their expertise and judgment to determine whether an individual is a politician, like in the case of a part-time elected official.

Former candidates for office or former officials continue to be covered by our third party fact-checking program. That remains true for organizations like Super PACs or advocacy organizations that are unaffiliated with candidates.

There will be some instances where a false or partly false rating from our fact-checking partners will affect politicians. When a politician shares a specific piece of content - i.e., a link to an article, video or photo created by someone else that has been previously debunked on Facebook - we will demote that content, display a warning and reject its inclusion in ads. This is different from a politician's own claim or statement. If a claim is made directly by a politician on their Page, in an ad or on their website, it is considered direct speech and ineligible for our third party fact checking program — even if the substance of that claim has been debunked elsewhere. Ads about [social issues](#), [elections](#) or [politics](#) are held to a higher transparency standard on Facebook. All inactive and active ads run by politicians on Facebook will be housed in the publicly available, searchable [Ad Library](#) for up to seven years.

Q. WHY ARE POLITICIANS NOT ELIGIBLE?

A. Our approach is grounded in Facebook's fundamental belief in free expression, respect for the democratic process, and the belief that, especially in mature democracies with a free press, political speech is the most scrutinized speech there is. Just as critically, by limiting political speech we would leave people less informed about what their elected officials are saying and leave politicians less accountable for their words.

Q: WHAT ARE THE RATING OPTIONS FOR THIRD-PARTY FACT-CHECKERS?

A: For each piece of content up for review, the third-party fact-checker is asked: "How accurate is this story? Provide your rating below." Facebook's third-party fact-checker product provides 9 rating options:

1. **False:** The primary claim(s) of the content are factually inaccurate. This generally corresponds to "false" or "mostly false" ratings on fact-checkers' sites.
2. **Mixture:** The claim(s) of the content are a mix of accurate and inaccurate, or the primary claim is misleading or incomplete.
3. **True:** The primary claim(s) of the content are factually accurate. This generally corresponds to "true" or "mostly true" ratings on fact-checkers' sites.

4. **False Headline:** The primary claim(s) of the article body content are true, but the primary claim within the headline is factually inaccurate.
5. **Not eligible:** The content contains a claim that is not verifiable, was true at the time of writing, or from a website or Page with the primary purpose of expressing the opinion or agenda of a political figure.
6. **Satire:** The content is posted by a Page or domain that is a known satire publication, or a reasonable person would understand the content to be irony or humor with a social message. It still may benefit from additional context.
7. **Opinion:** The content advocates for ideas and draws conclusions based on the interpretation of facts and data, and tells the public what the author or contributor thinks about an event or issue. Opinion pieces may include reported facts or quotes, but emphasize the author's own thoughts, personal preferences and conclusions. This may include editorials, endorsements, or content labeled "opinion" in the headline, authored by an identified opinion columnist, or shared from a website or Page with the main purpose of expressing the opinions or agendas of public figures, think tanks, NGOs, and businesses.
8. **Prank generator:** Websites that allow users to create their own "prank" news stories to share on social media sites.
9. **Not rated:** This is the default state before fact-checkers have fact-checked content or if the URL is broken. Leaving it in this state (or returning to this rating from another rating) means that we should take no action based on your rating.

Q: WHAT HAPPENS IF UNPAID CONTENT (ORGANIC) I CREATED OR SHARED IS RATED "FALSE," "MIXTURE," OR "FALSE HEADLINE" BY A FACT-CHECKER?

A: First, that content's distribution is reduced. It will appear lower in News Feed, and will be accompanied by Related Articles from fact-checkers. If people try to share the content, they will be notified of the additional reporting. They will also be notified if content they have shared in the past has since been rated by a fact-checker.

Second, in order to more effectively fight false news, we also take action against Pages and domains that repeatedly share or publish content which is rated "False." Such Pages and domains will see their distribution reduced as the number of offenses increases. Their ability to monetize and advertise will be removed after repeated offenses. Over time, Pages and domains can restore their distribution and ability to monetize and advertise if they stop sharing false news.

Third, Pages and domains that repeatedly publish or share false news will also lose their ability to register as a news Page on Facebook. If a registered news Page repeatedly shares false news, its news Page registration will be revoked.

Publishers who issue a correction or dispute a rating may contact the fact-checker. If their correction or dispute is successful, the strike against them will be eliminated and associated ad disapprovals may be lifted (Advertisers are still required to follow our other [Advertising Policies](#)).

For corrections, please ensure the relevant information has been corrected on both your website and the relevant Facebook post (including image and headline). Please include this Facebook post URL in your email to the relevant fact-checking organization. We also ask that publishers submit their correction or dispute within one week of receiving a “False,” “Mixture,” or “False Headline” rating notification. We can’t guarantee that appeals made after this one-week window will be processed by our fact-checking partners. Note that simply deleting a post or removing a URL is not sufficient to eliminate the strike against the Page or domain.

Q: WHAT HAPPENS IF PAID CONTENT (ADS) I CREATED OR SHARED IS RATED “FALSE” BY A FACT-CHECKER?

A: Per our [Advertising Policies](#), we do not allow advertisers to run ads that contain content that has been marked false, or is similar to content marked false, by third-party fact-checkers. We disapprove ads that contain content rated false, which means these ads can’t run.

If an ad is disapproved for containing misinformation, we notify advertisers in two ways:

1. A Page Admin notification, which specifies the third-party fact-checker that rated their content false
2. An ad disapproval notification in their ads creation interface (e.g. Ads Manager)

Advertisers may reach out directly to the third-party fact-checker that rated their content to issue a correction for, or dispute a rating of, content the advertiser created. The fact-checking partners can be reached through the email addresses provided below.

In cases where ads are rejected for containing content that’s similar to content already marked false by fact-checkers, advertisers may request that the match get re-reviewed through the ad disapproval notification. The veracity of the content cannot be disputed via this channel.

If an advertiser’s correction or dispute is successful, the associated ad disapproval will be lifted, provided that we have not identified additional violations of our [Advertising Policies](#).

Q: WHAT HAPPENS IF MY CONTENT IS CONSISTENTLY MARKED AS FALSE BY FACT-CHECKERS?

A: Pages that repeatedly publish or share misinformation will see their distribution reduced and their ability to monetize and advertise removed.

Q: HOW DOES FACT-CHECKING IMPACT SOCIAL MEDIA DOMAINS OR HOSTING SITES?

A: Links from other social media domains or hosting sites can be fact-checked; however, these sites will not be eligible to see their overall distribution reduced, or lose their ability to monetize and advertise.

Q: IF A PAGE ADMIN SHARES “FALSE” CONTENT THAT IT DID NOT CREATE, CAN IT PURSUE A CORRECTION, OR DISPUTE WITH RESPECT TO THAT CONTENT?

A: Page admins are responsible for the content they share with their audiences — even if that content isn't created by them. Page admins cannot pursue a correction or dispute. However, if the publisher that wrote the content successfully issues a correction or disputes the rating, the Page's strike will be lifted.

Note that simply deleting a post is not sufficient to eliminate the strike against the Page or domain.

Over time, Pages and domains can restore their distribution and abilities to monetize and advertise if they stop sharing false news.

Q: HOW DO PUBLISHERS ISSUE A CORRECTION FOR, OR DISPUTE A RATING OF, CONTENT THEY CREATED?

A: Publishers may reach out directly to the third-party fact-checking organizations if (1) they have corrected the rated content, or if (2) they believe the fact-checker's rating is inaccurate.

- **(1) Corrections:** To issue a correction, the publisher must correct the false content and clearly state that a correction was made directly on the story.
- **(2) Disputes:** To dispute a rating, the publisher must clearly indicate why the original rating was inaccurate.

If a rating is successfully corrected or disputed, the demotion on the content will be lifted, associated ad disapprovals may be lifted, and the strike against the Page or domain will be removed. It may take a few days to see the distribution for the Page or domain recover. Additionally, any recovery will be affected by other false news strikes and related interventions (like demotions for clickbait or ad disapprovals for other [Advertising Policies](#)).

Please note:

- Corrections and disputes are processed at the fact-checker's discretion. Fact-checkers are asked to respond to requests in a reasonable time period — ideally one business day for a simple correction, and up to a few business days for more complex disputes.
- For corrections, please ensure the relevant information has been corrected on both your website and the relevant Facebook post (including image and headline).

Please include this Facebook post URL in your email to the relevant fact-checking organization.

- Publishers must submit their correction or dispute within one week of receiving a “False,” “Mixture,” or “False Headline” rating notification. We can’t guarantee that appeals made after this one-week window will be processed by our fact-checking partners.
- If your content is rated by multiple organizations, you may need to contact each fact-checker. But note that if your content has been marked “True” by a fact-checker, that rating supersedes a “Mixture” or “False” rating given by another fact-checker.
- Abuse of the corrections and disputes process will be penalized.

Q: WHAT IS FACEBOOK'S INDEX OF NEWS PAGES?

A: Facebook helps people around the world connect with the news that's most important and meaningful to them. We're asking publishers to register their news Pages so that we can index the Pages that publish news on our platform.

Submitting a Page in [Business Manager](#) lets us know that the Page primarily publishes news content. Submitted Pages will be reviewed for registration according to our [Registration Guidelines](#). Once registered, a Page may be eligible for products and services specifically designed for news publishers.

Facebook reserves the right to modify, suspend, terminate access to or discontinue the availability of this process at any time. To ensure the best experiences for people and publishers, we may modify or make exceptions to these guidelines as necessary. Inclusion in the news Page index is based on these [guidelines](#), and does not constitute an endorsement by Facebook of the views espoused by included Pages.

Please use the following email addresses to contact the appropriate third-party fact-checking organizations:

[Argentina](#)

[Australia](#)

[Burkina Faso](#)

[Brazil](#)

[Cameroon](#)

Canada

Colombia

Cote d'Ivoire

Croatia

Democratic Republic of Congo

Denmark

Ethiopia

France

Germany

Ghana

Greece

Guinea-Conakry

Hong Kong

India

Indonesia

Ireland

Israel

Italy

Kenya

Lithuania

Malaysia

Mexico

Middle East and North Africa

Netherlands

Nigeria

Norway

Pakistan

Philippines

Poland

Portugal

Senegal

Singapore

Somalia

South Africa

Spain

Sri Lanka

Taiwan

Tanzania

Thailand

Turkey

United Kingdom

United States

Uruguay

Was this information helpful?

Yes No

[Permalink](#) · [Share](#)

EXHIBIT C

facebook Newsroom

June 21, 2018

How People Help Fight False News



To fight the spread of false news, Facebook uses a mix of technological solutions, human reviewers, and educational programs that promote news literacy. The Facebook community plays an important role, too: people can give feedback that a post on Facebook contains false news by clicking the three dots at the top of the post. But how does Facebook use that information?

To rank posts in your News Feed, Facebook looks at thousands of different data points, or signals, about the posts that have been shared by your community, including the people you're friends with and the Pages you follow. Signals include a wide range of things, from how old a given post is and who posted it to little things, like how fast your internet connection is right now or what kind of phone you're using.

One application of these signals is to help determine whether a post might be clickbait, false news, or other types of inauthentic content. Today, in the US, the signals for false news include things like whether the post is being shared by a Page that's spread a lot of false news before, whether the comments on the post include phrases that indicate readers don't believe the content is true, or whether someone in the community has marked the post as false news.

Facebook uses a machine learning classifier to compile all of those misinformation signals and — by comparing a given post to past examples of false news — make a prediction: “How likely is it that a third-party fact-checker would say this post is false?” (Facebook uses classifiers for a lot of different things, like predicting whether a post is clickbait or contains nudity; you can read more in [this roundtable interview from *Wired*](#)). The classifier's predictions are then used to determine whether a given piece of content should be sent to third-party fact-checkers. If a fact-checker rates the content as false, it will get shown lower in people's News Feeds and [additional reporting](#) from fact-checkers will be provided.

More feedback from more people helps make the classifier more accurate, but feedback in and of itself doesn't trigger the fact-checking process. That's because people may mean different things when they mark a post — they might disagree with the content, or dislike the Page or person posting it. “There are no clean signals about false news,” says Antonia Woodford, a product manager on the News Feed integrity team. “If there were, it would be easier to get rid of.” That's why the misinformation classifier takes a range of things into account — though user feedback is one of the most important.

Facebook is continually working to improve its classifiers. Classifiers learn to make their predictions by looking at a variety of examples of the thing they're trying to identify — so the more data collected, the better the classifier gets and the more precisely it can sift through signals to find meaningful patterns. Facebook also has to make sure that it's serving people in different cultural and linguistic contexts, so classifiers also have to be trained to be sensitive to regional and linguistic differences, as well as to cultural norms. This means that the variety of misinformation signals Facebook relies upon in any given country, and the weight that is assigned to each, is not static.

Want to help reduce the spread of false news in an even more immediate way? Learn how to recognize it and then refrain from sharing it — check out these [tips for spotting false news](#).



1. **Be skeptical of headlines.** False news stories often have catchy headlines in all caps with exclamation points. If shocking claims in the headline sound unbelievable, they probably are.
2. **Look closely at the link.** A phony or look-alike URL may be a warning sign of false news. Many false news sites mimic authentic news sources by making small changes to the URL. You can go to the site to compare the URL to established sources.
3. **Investigate the source.** Ensure that the story is written by a source that you trust with a reputation for accuracy. If the story comes from an unfamiliar organization, check their “About” section to learn more.
4. **Watch for unusual formatting.** Many false news sites have misspellings or awkward layouts. Read carefully if you see these signs.
5. **Consider the photos.** False news stories often contain manipulated images or videos. Sometimes the photo may be authentic, but taken out of context. You can search for the photo or image to verify where it came from.

6. **Inspect the dates.** False news stories may contain timelines that make no sense, or event dates that have been altered.
7. **Check the evidence.** Check the author's sources to confirm that they are accurate. Lack of evidence or reliance on unnamed experts may indicate a false news story.
8. **Look at other reports.** If no other news source is reporting the same story, it may indicate that the story is false. If the story is reported by multiple sources you trust, it's more likely to be true.
9. **Is the story a joke?** Sometimes false news stories can be hard to distinguish from humor or satire. Check whether the source is known for parody, and whether the story's details and tone suggest it may be just for fun.
10. **Some stories are intentionally false.** Think critically about the stories you read, and only share news that you know to be credible.

See also:

[Facing Facts](#), a behind-the-scenes look at Facebook's fight against false news

[The Three-Part Recipe for Cleaning up Your News Feed](#)

Category: [Integrity and Security](#)

Tags: [False News](#)

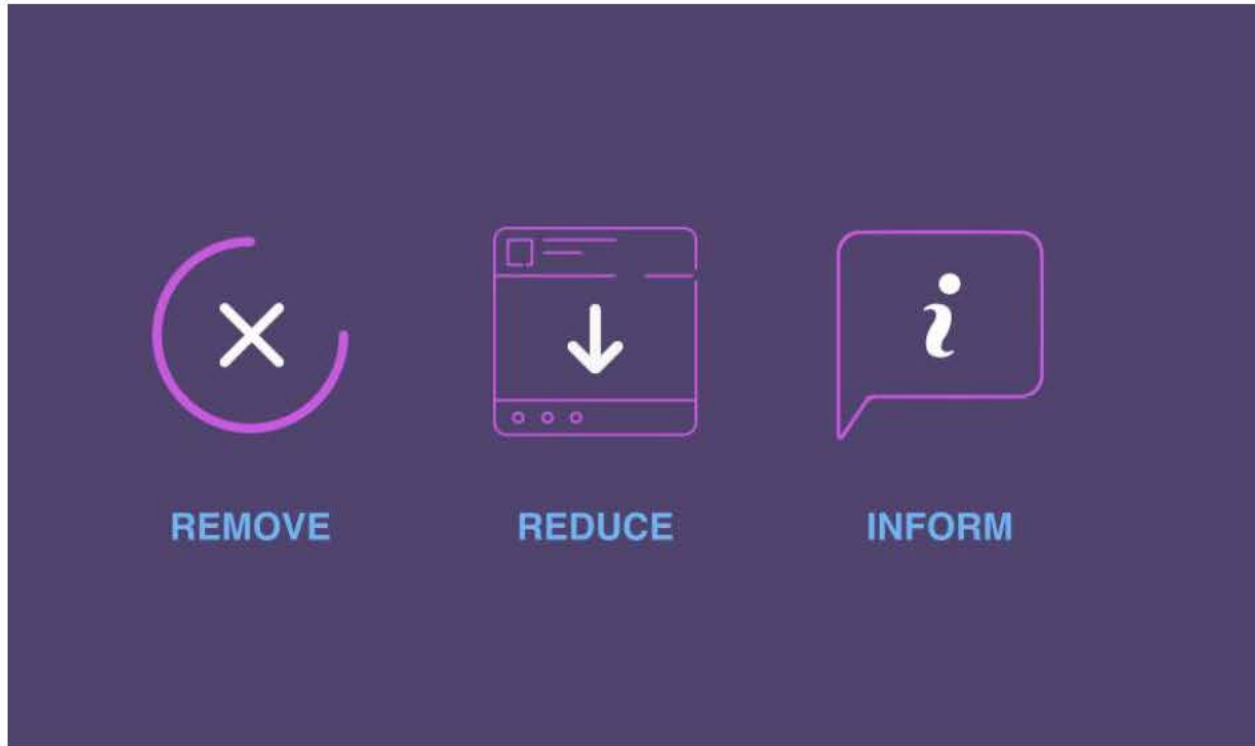
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EXHIBIT D

facebook Newsroom

May 23, 2018

Hard Questions: What's Facebook's Strategy for Stopping False News?



Hard Questions is a series from Facebook that addresses the impact of our products on society.

By Tessa Lyons, Product Manager

False news has long been a tool for economic or political gains, and we're seeing new ways it's taking shape online. Spammers can use it to drive clicks and yield profits. And the way it's been used by adversaries in recent elections and amid ethnic conflicts around the world is reprehensible.

False news is bad for people and bad for Facebook. We're making significant investments to stop it from spreading and to promote high-quality journalism and news literacy. I'm a product manager on News Feed focused on false news, and I work with teams across the company to address this problem.

Our strategy to stop misinformation on Facebook has three parts:

- Remove accounts and content that violate our [Community Standards](#) or [ad policies](#)
- Reduce the distribution of false news and inauthentic content like clickbait
- Inform people by giving them more context on the posts they see

This approach roots out the bad actors that frequently spread fake stories. It dramatically decreases the reach of those stories. And it helps people stay informed without stifling public discourse. I'll explain a little bit more about each part and the progress we're making.

Removing accounts and content that violates our policies

Although false news does not violate our [Community Standards](#), it often violates our policies in other categories, such as spam, hate speech or fake accounts, which we remove.

For example, if we find a Facebook Page pretending to be run by Americans that's actually operating out of Macedonia, that violates our requirement that people use their real identities and not impersonate others. So we'll take down that whole Page, immediately eliminating any posts they made that might have been false.

Over the past year we've learned more about how networks of bad actors work together to spread misinformation, so we created a new policy to tackle coordinated inauthentic activity. We're also using machine learning to help our teams detect fraud and enforce our policies against spam. We now block millions of fake accounts every day when they try to register.

Reducing the spread of false news and inauthentic content

A lot of the misinformation that spreads on Facebook is financially motivated, much like email spam in the 90s. If spammers can get enough people to click on fake stories and visit their sites, they'll make money off the ads they show. By making these scams unprofitable, we destroy their incentives to spread false news on Facebook. So we're figuring out spammers' common tactics and reducing the distribution of those kinds of stories in News Feed. We've started penalizing [clickbait](#), [links shared more frequently by spammers](#), and [links to low-quality web pages](#), also known as "ad farms."

We also take action against entire Pages and websites that repeatedly share false news, reducing their overall News Feed distribution. And since we don't want to make money off of misinformation or help those who create it profit, these publishers are not allowed to [run ads](#) or [use our monetization features](#) like Instant Articles.

Another part of our strategy in some countries is partnering with [third-party fact-checkers](#) to review and rate the accuracy of articles and posts on Facebook. These fact-checkers are independent and [certified](#) through the non-partisan International Fact-Checking Network. When these organizations rate something as false, we rank those stories significantly lower in News Feed. On average, this cuts

future views by more than 80%. We also use the information from fact-checkers to improve our technology so we can identify more potential false news faster in the future. We're looking forward to bringing this program to more countries this year.

Informing our community with additional context

Even with these steps, we know people will still come across misleading content on Facebook and the internet more broadly. To help people make informed decisions about what to read, trust and share, we're investing in news literacy and building products that give people more information directly in News Feed.

For example, we recently [rolled out](#) a feature to give people more information about the publishers and articles they see, such as the publisher's Wikipedia entry. Another feature, called [Related Articles](#), displays articles from third-party fact-checkers immediately below a story on the same topic. If a fact-checker has rated a story as false, we'll let people who try to share the story know there's more reporting on the subject. We'll also notify people who previously shared the story on Facebook. Last year we created an [educational tool](#) to give people tips to identify false news and provided a founding grant for the [News Integrity Initiative](#) to invest in long-term strategies for news literacy.



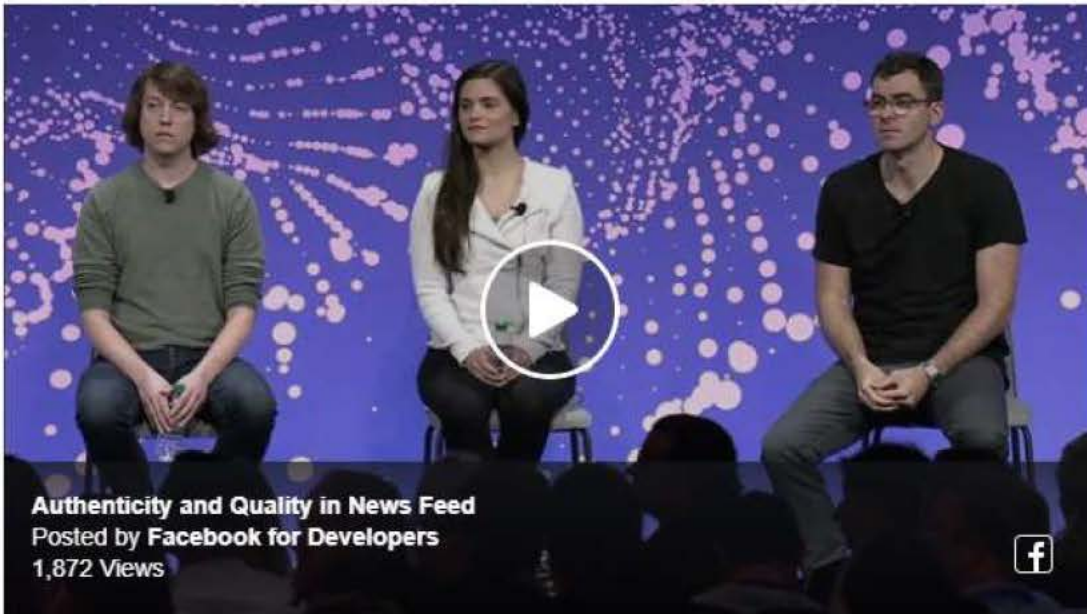
Added context for articles in News Feed.

Getting Ahead

As we double down on countering misinformation, our adversaries are going to keep trying to get around us. We need to stay ahead of them, and we can't do this alone. We're working with our AI research team, learning from academics, expanding our partnerships with third-party fact-checkers, and talking to other organizations — including other platforms — about how we can work together.

False news has disruptive and destructive consequences around the world. We have an important responsibility, and we know we have a lot of work to do to live up to it. We'll continue to share updates on our progress and more about our approach in upcoming posts.

You can learn more about our strategy to stop false news in the short film "Facing Facts" on Inside Feed and in this talk from our F8 developer conference:



Category: [Hard Questions](#) • [Integrity and Security](#)

Tags: [False News](#)

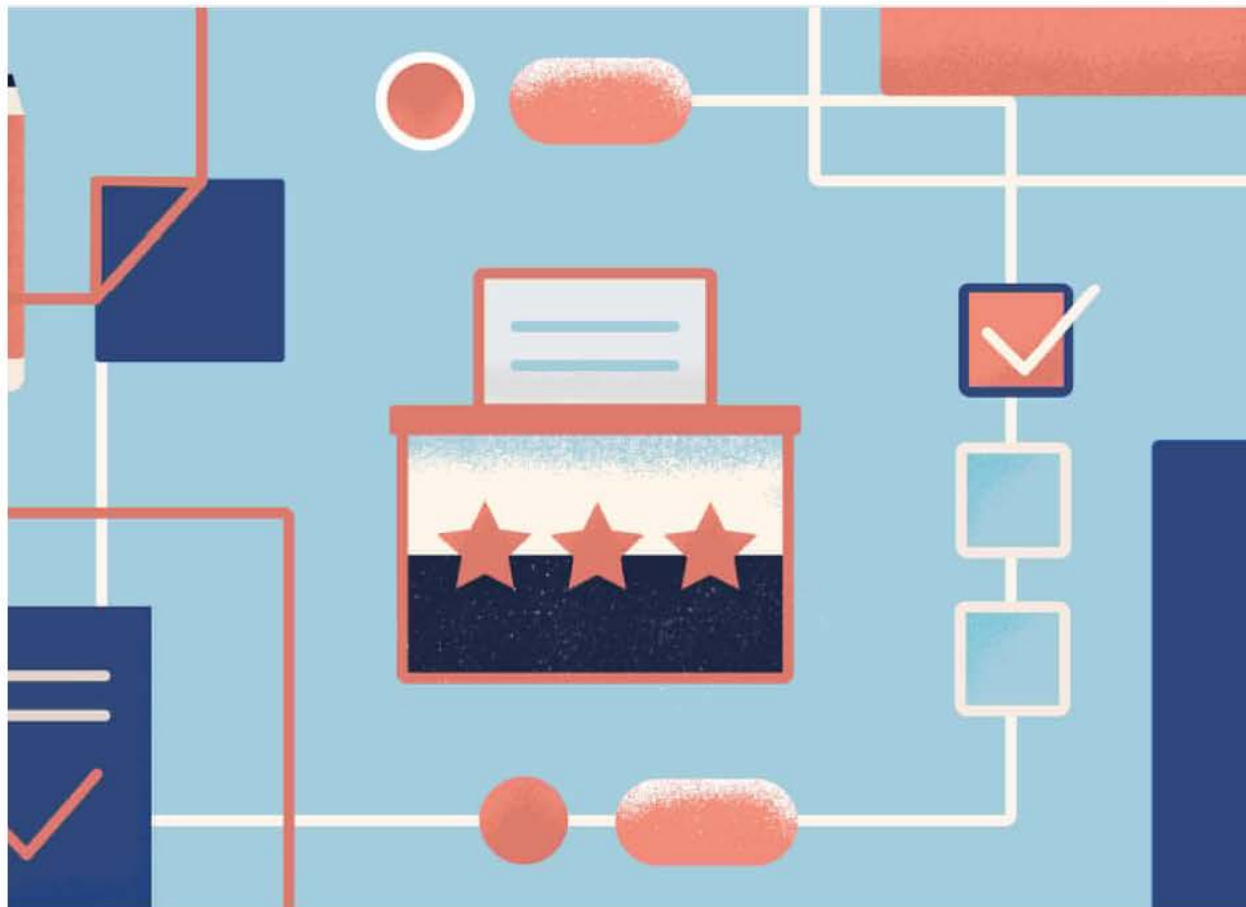
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EXHIBIT E

facebook Newsroom

October 21, 2019

Helping to Protect the 2020 US Elections



By Guy Rosen, VP of Integrity; Katie Harbath, Public Policy Director, Global Elections; Nathaniel Gleicher, Head of Cybersecurity Policy and Rob Leathern, Director of Product Management

We have a responsibility to stop abuse and election interference on our platform. That's why we've made significant investments since 2016 to better identify new threats, close vulnerabilities and reduce the spread of viral misinformation and fake accounts.

Today, almost a year out from the 2020 elections in the US, we're announcing several new measures to help protect the democratic process and providing an update on initiatives already underway:

Fighting foreign interference

- Combating inauthentic behavior, including an updated policy
- Protecting the accounts of candidates, elected officials, their teams and others through Facebook Protect

Increasing transparency

- Making Pages more transparent, including showing the confirmed owner of a Page
- Labeling state-controlled media on their Page and in our Ad Library
- Making it easier to understand political ads, including a new US presidential candidate spend tracker

Reducing misinformation

- Preventing the spread of misinformation, including clearer fact-checking labels
- Fighting voter suppression and interference, including banning paid ads that suggest voting is useless or advise people not to vote
- Helping people better understand the information they see online, including an initial investment of \$2 million to support media literacy projects

Fighting Foreign Interference

Combating Inauthentic Behavior

Over the last three years, we've worked to identify new and emerging threats and remove [coordinated inauthentic behavior](#) across our apps. In the past year alone, we've taken down over 50 networks worldwide, many ahead of major democratic elections. As part of our effort to counter foreign influence campaigns, this morning we removed four separate networks of accounts, Pages and Groups on Facebook and Instagram for engaging in coordinated inauthentic behavior. Three of them originated in Iran and one in Russia. They targeted the US, North Africa and Latin America. We have identified these manipulation campaigns as part of our internal investigations into suspected Iran-linked inauthentic behavior, as well as ongoing proactive work ahead of the US elections.

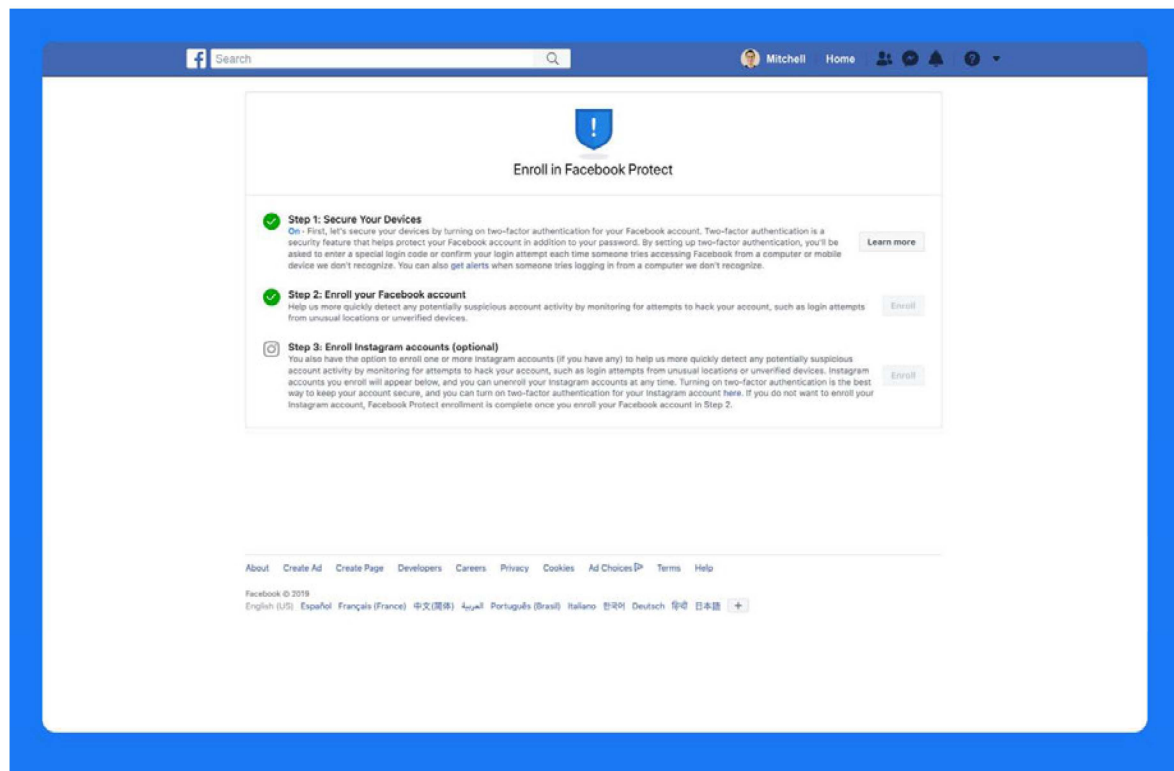
We took down these networks based on their behavior, not the content they posted. In each case, the people behind this activity coordinated with one another and used fake accounts to misrepresent themselves, and that was the basis for our action. We have shared our findings with law enforcement and industry partners. More details can be found [here](#).

As we've improved our ability to disrupt these operations, we've also built a deeper understanding of different threats and how best to counter them. We investigate and enforce against any type of inauthentic behavior. However, the most appropriate way to respond to someone boosting the popularity of their posts in their own country may not be the best way to counter foreign interference. That's why we're updating our [inauthentic behavior policy](#) to clarify how we deal with the range of deceptive practices we see on our platforms, whether foreign or domestic, state or non-state.

Protecting the Accounts of Candidates, Elected Officials and Their Teams

Today, we're launching Facebook Protect to further secure the accounts of elected officials, candidates, their staff and others who may be particularly vulnerable to targeting by hackers and foreign adversaries. As we've seen in past elections, they can be targets of malicious activity. However, because campaigns are generally run for a short period of time, we don't always know who these campaign-affiliated people are, making it harder to help protect them.

Beginning today, Page admins can enroll their organization's Facebook and Instagram accounts in Facebook Protect and invite members of their organization to participate in the program as well. Participants will be required to turn on two-factor authentication, and their accounts will be monitored for hacking, such as login attempts from unusual locations or unverified devices. And, if we discover an attack against one account, we can review and protect other accounts affiliated with that same organization that are enrolled in our program. Read more about Facebook Protect and enroll [here](#).

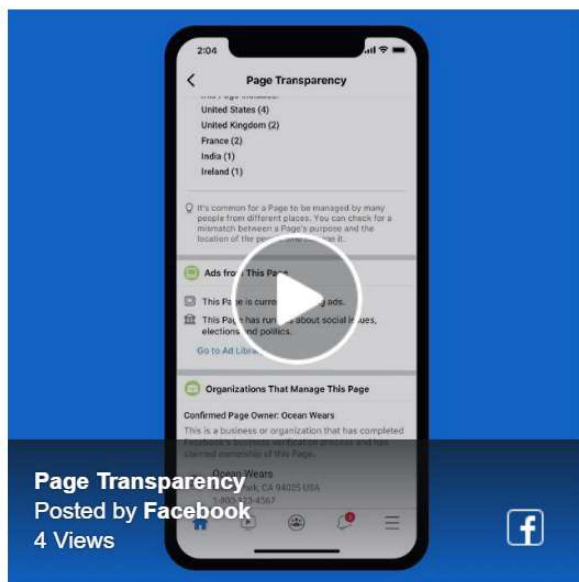


Increasing Transparency

Making Pages More Transparent

We want to make sure people are using Facebook authentically, and that they understand who is speaking to them. Over the past year, we've taken steps to ensure Pages are authentic and more transparent by showing people the Page's primary country location and whether the Page has merged with other Pages. This gives people more context on the Page and makes it easier to understand who's behind it.

Increasingly, we've seen people failing to disclose the organization behind their Page as a way to make people think that a Page is run independently. To address this, we're adding more information about who is behind a Page, including a new "Organizations That Manage This Page" tab that will feature the Page's "Confirmed Page Owner," including the organization's legal name and verified city, phone number or website.



Initially, this information will only appear on Pages with large US audiences that have gone through Facebook's [business verification](#). In addition, Pages that have gone through the new authorization process to run ads about social issues, elections or politics in the US will also have this tab. And starting in January, these advertisers will be required to show their Confirmed Page Owner.

If we find a Page is concealing its ownership in order to mislead people, we will require it to successfully complete the verification process and show more information in order for the Page to stay up.

Labeling State-Controlled Media

We want to help people better understand the sources of news content they see on Facebook so they can make informed decisions about what they're reading. Next month, we'll begin labeling media outlets that are wholly or partially under the editorial control of their government as state-controlled media. This label will be on both their Page and in our Ad Library.

We will hold these Pages to a higher standard of transparency because they combine the opinion-making influence of a media organization with the strategic backing of a state.

We developed our own definition and standards for state-controlled media organizations with input from more than 40 experts around the world specializing in media, governance, human rights and development. Those consulted represent leading academic institutions, nonprofits and international organizations in this field, including Reporters Without Borders, Center for International Media Assistance, European Journalism

Center, Oxford Internet Institute, Center for Media, Data and Society (CMDS) at the Central European University, the Council of Europe, UNESCO and others.

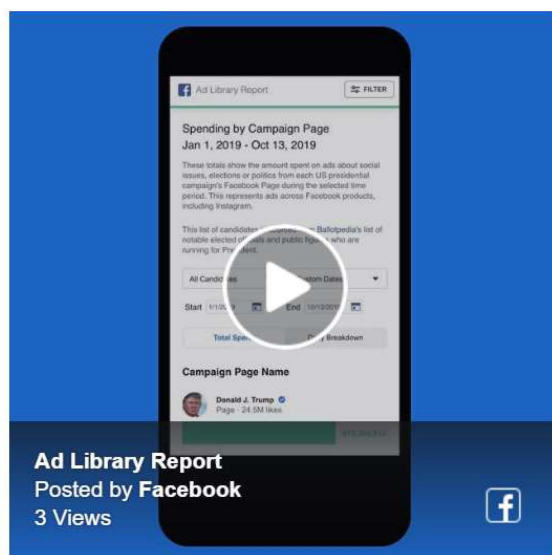
It's important to note that our policy draws an intentional distinction between state-controlled media and public media, which we define as any entity that is publicly financed, retains a public service mission and can demonstrate its independent editorial control. At this time, we're focusing our labeling efforts only on state-controlled media.

We will update the list of state-controlled media on a rolling basis beginning in November. And, in early 2020, we plan to expand our labeling to specific posts and apply these labels on Instagram as well. For any organization that believes we have applied the label in error, there will be an appeals process.

Making it Easier to Understand Political Ads

In addition to making Pages more transparent, we're updating the Ad Library, Ad Library Report and Ad Library API to help journalists, lawmakers, researchers and others learn more about the ads they see. This includes:

- A new US presidential candidate spend tracker, so that people can see how much candidates have spent on ads
- Adding additional spend details at the state or regional level to help people analyze advertiser and candidate efforts to reach voters geographically
- Making it clear if an ad ran on Facebook, Instagram, Messenger or Audience Network
- Adding useful API filters, providing programmatic access to download ad creatives and a repository of frequently used API scripts.



In addition to updates to the Ad Library API, in November, we will begin testing a new database with researchers that will enable them to quickly download the entire Ad Library, pull daily snapshots and track

day-to-day changes.

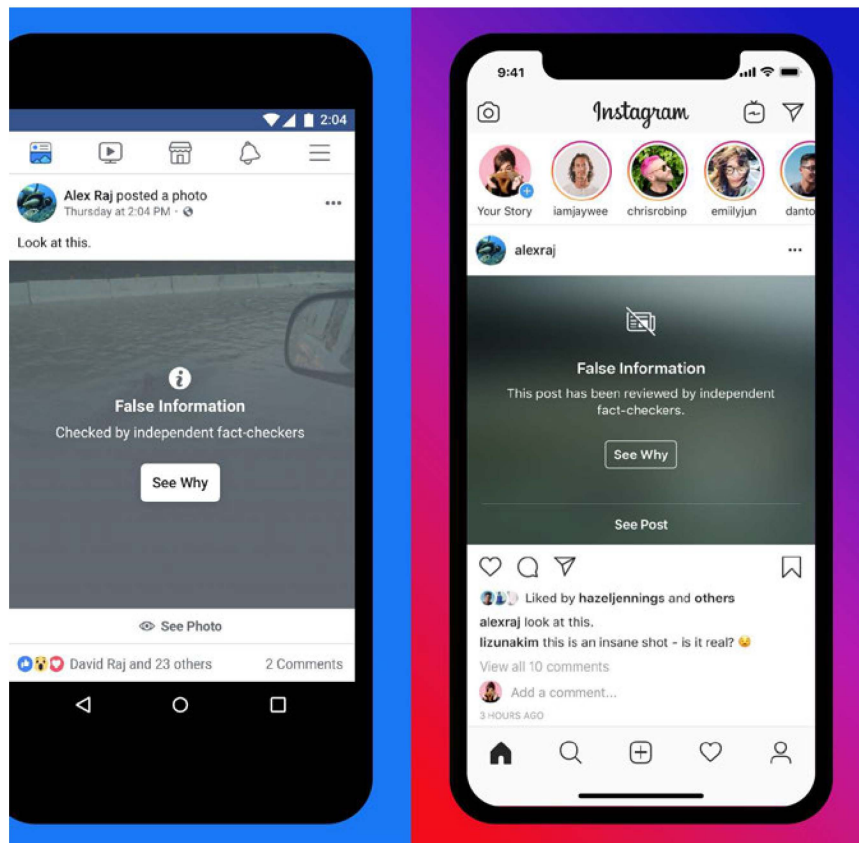
Visit our Help Center to learn more about the changes to [Pages](#) and [the Ad Library](#).

Reducing Misinformation

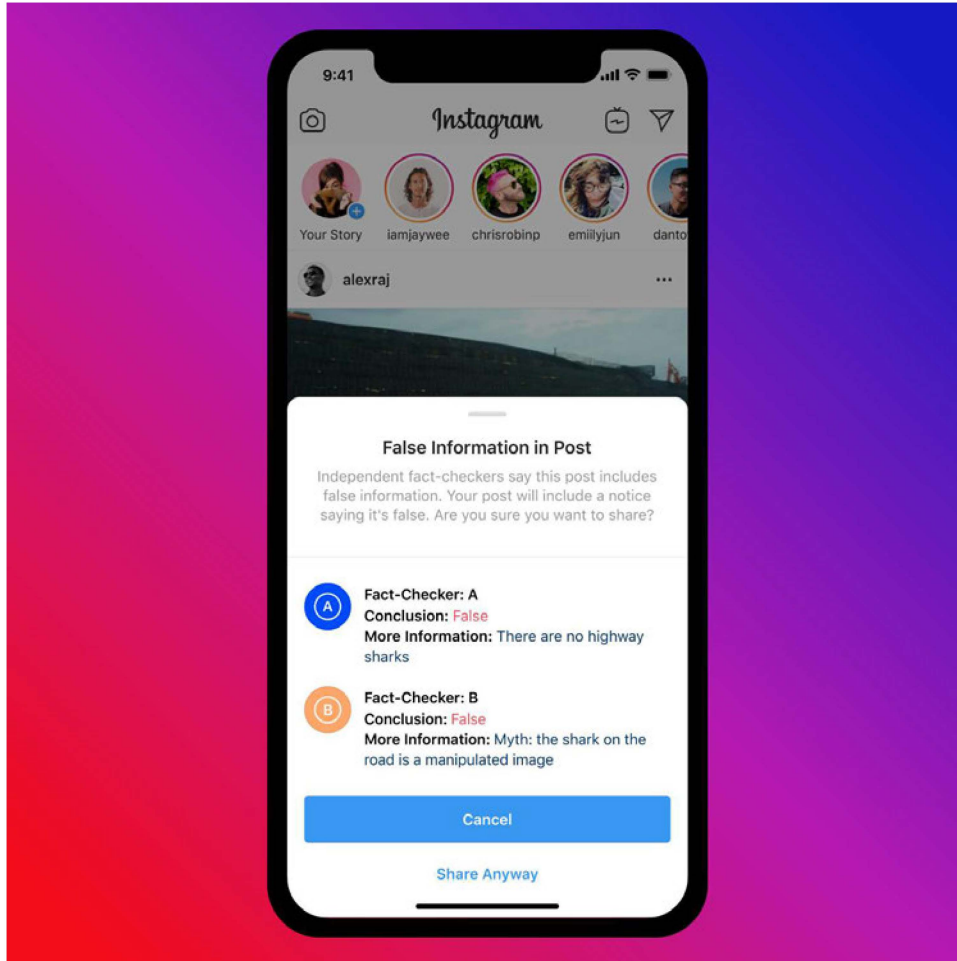
Preventing the Spread of Viral Misinformation

On Facebook and Instagram, we work to keep confirmed misinformation from spreading. For example, we reduce its distribution so fewer people see it — on Instagram, we remove it from Explore and hashtags, and on Facebook, we reduce its distribution in News Feed. On Instagram, we also make content from accounts that repeatedly post misinformation harder to find by filtering content from that account from Explore and hashtag pages for example. And on Facebook, if Pages, domains or Groups repeatedly share misinformation, we'll continue to reduce their overall distribution and we'll place restrictions on the Page's ability to advertise and monetize.

Over the next month, content across Facebook and Instagram that has been rated false or partly false by a third-party fact-checker will start to be more prominently labeled so that people can better decide for themselves what to read, trust and share. The labels below will be shown on top of false and partly false photos and videos, including on top of Stories content on Instagram, and will link out to the assessment from the fact-checker.



Much like we do on Facebook when people try to share known misinformation, we're also introducing a new pop-up that will appear when people attempt to share posts on Instagram that include content that has been debunked by third-party fact-checkers.



In addition to clearer labels, we're also working to take faster action to prevent misinformation from going viral, especially given that quality reporting and fact-checking takes time. In many countries, including in the US, if we have signals that a piece of content is false, we temporarily reduce its distribution pending review by a third-party fact-checker.

Fighting Voter Suppression and Intimidation

Attempts to interfere with or suppress voting undermine our core values as a company, and we work proactively to remove this type of harmful content. Ahead of the 2018 midterm elections, we extended our voter suppression and intimidation policies to prohibit:

- Misrepresentation of the dates, locations, times and methods for voting or voter registration (e.g. "Vote by text!");

- Misrepresentation of who can vote, qualifications for voting, whether a vote will be counted and what information and/or materials must be provided in order to vote (e.g. “If you voted in the primary, your vote in the general election won’t count.”); and
- Threats of violence relating to voting, voter registration or the outcome of an election.

We remove this type of content regardless of who it’s coming from, and ahead of the midterm elections, our Elections Operations Center removed more than 45,000 pieces of content that violated these policies — more than 90% of which our systems detected before anyone reported the content to us.

We also recognize that there are certain types of content, such as hate speech, that are equally likely to suppress voting. That’s why our [hate speech policies](#) ban efforts to exclude people from political participation on the basis of things like race, ethnicity or religion (e.g., telling people not to vote for a candidate because of the candidate’s race, or indicating that people of a certain religion should not be allowed to hold office).

In advance of the US 2020 elections, we’re implementing additional policies and expanding our technical capabilities on Facebook and Instagram to protect the integrity of the election. Following up on a commitment we made in the [civil rights audit report](#) released in June, we have now implemented our policy banning paid advertising that suggests voting is useless or meaningless, or advises people not to vote.

In addition, our systems are now more effective at proactively detecting and removing this harmful content. We use machine learning to help us quickly identify potentially incorrect voting information and remove it.

We are also continuing to expand and develop our partnerships to provide expertise on trends in voter suppression and intimidation, as well as early detection of violating content. This includes working directly with secretaries of state and election directors to address localized voter suppression that may only be occurring in a single state or district. This work will be supported by our Elections Operations Center during both the primary and general elections.

Helping People Better Understand What They See Online

Part of our work to stop the spread of misinformation is helping people spot it for themselves. That’s why we partner with organizations and experts in media literacy.

Today, we’re announcing an initial investment of \$2 million to support projects that empower people to determine what to read and share — both on Facebook and elsewhere.

These projects range from training programs to help ensure the largest Instagram accounts have the resources they need to reduce the spread of misinformation, to expanding a pilot program that brings together senior citizens and high school students to learn about online safety and media literacy, to public events in local venues like bookstores, community centers and libraries in cities across the country. We’re also supporting a series of training events focused on critical thinking among first-time voters.

In addition, we're including a new series of media literacy lessons in our Digital Literacy Library. These lessons are drawn from the Youth and Media team at the Berkman Klein Center for Internet & Society at Harvard University, which has made them available for free worldwide under a Creative Commons license. The lessons, created for middle and high school educators, are designed to be interactive and cover topics ranging from assessing the quality of the information online to more technical skills like reverse image search.

We'll continue to develop our media literacy efforts in the US and we'll have more to share soon.

Downloads:

[Press Call Transcript](#)

Category: [Community and Social Impact](#) · [Company News](#) · [Integrity and Security](#) · [Public Policy](#) · [Safety and Well-Being](#)

Tags: [Ads and Pages Transparency](#) · [Elections](#) · [False News](#)

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EXHIBIT F

September 13, 2018

Expanding Fact-Checking to Photos and Videos

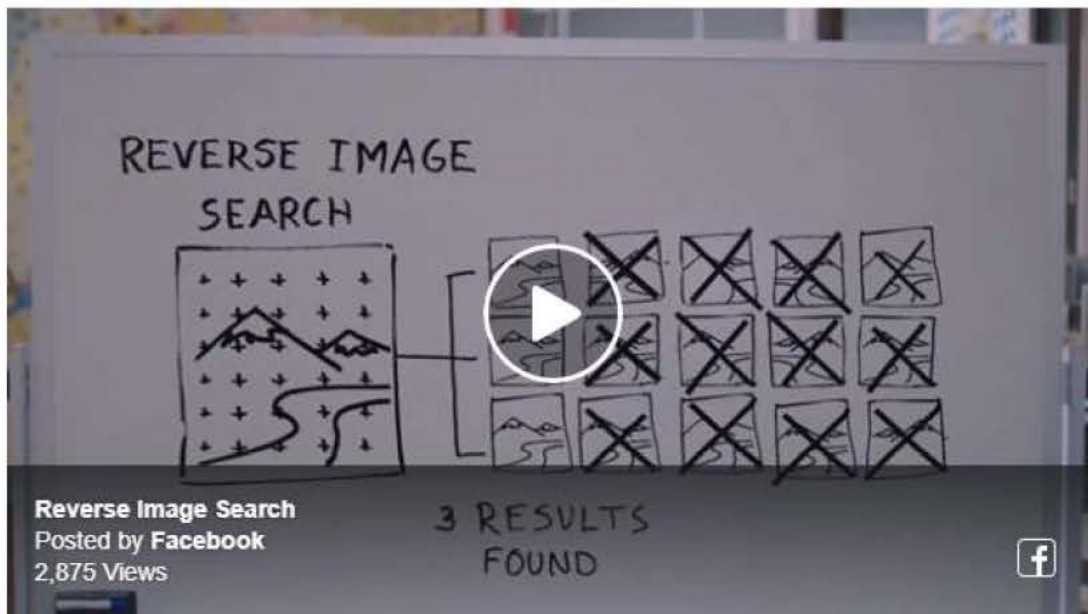


By Antonia Woodford, Product Manager

We know that people want to see accurate information on Facebook, so for the last two years, we've made fighting misinformation a priority. One of the [many steps](#) we take to reduce the spread of false news is working with independent, third-party [fact-checkers](#) to review and [rate the accuracy](#) of content. To date, most of our fact-checking partners have focused on reviewing articles. However, we have also been actively working to build new technology and partnerships so that we can tackle other forms of misinformation. Today, we're **expanding fact-checking for photos and videos to all of our 27 partners in 17 countries around the world** (and are regularly on-boarding new fact-checking partners). This will help us identify and take action against more types of misinformation, faster.

How does this work?

Similar to our work for articles, we have built a machine learning model that uses various engagement signals, including feedback from people on Facebook, to identify potentially false content. We then send those photos and videos to fact-checkers for their review, or fact-checkers can surface content on their own. Many of our third-party fact-checking partners have expertise evaluating photos and videos and are trained in visual verification techniques, such as reverse image searching and analyzing image metadata, like when and where the photo or video was taken. Fact-checkers are able to assess the truth or falsity of a photo or video by combining these skills with other journalistic practices, like using research from experts, academics or government agencies.



As we get more ratings from fact-checkers on photos and videos, we will be able to improve the accuracy of our machine learning model. We are also leveraging other technologies to better recognize false or misleading content. For example, we use [optical character recognition \(OCR\)](#) to extract text from photos and compare that text to headlines from fact-checkers' articles. We are also working on new ways to detect if a photo or video has been manipulated. These technologies will help us identify more potentially deceptive photos and videos to send to fact-checkers for manual review. Learn more about how we approach this work in [an interview](#) with Tessa Lyons, Product Manager on News Feed.

How do we categorize false photos and videos?

Based on several months of research and testing with a handful of partners since [March](#), we know that misinformation in photos and videos usually falls into three categories: (1)

Manipulated or Fabricated, (2) Out of Context, and (3) Text or Audio Claim. These are the kinds of false photos and videos that we see on Facebook and hope to further reduce with the expansion of photo and video fact-checking.

1

Manipulated or fabricated

Altered with intent to deceive

Mexico: Animal Politico identified a false photo of Ricardo Anaya, a politician from Mexico, photoshopped onto a template of a US green card suggesting that he is a resident of Atlanta, Georgia despite running for Mexican president.



2

Out of context

Authentic, but misrepresented

France: AFP and France 24 both confirmed that the girl in these photos is not an actor posing as a victim in multiple incidents, but a genuine survivor of a single attack on the Syrian city of Aleppo on August 27, 2016.



3

Text or audio claim

Text, audio or caption is false

India: Boom Live debunked the caption that Narendra Modi is the 7th most corrupt Prime Minister based on unsubstantiated research from "BBC News Hub," which has no connection to the BBC.



(See more details on these examples from the fact-checkers' debunking articles: [Animal Politico](#), [AFP](#), [France 24](#), and [Boom Live](#)).

What's different about photos and videos?

People share millions of photos and videos on Facebook every day. We know that this kind of sharing is particularly compelling because it's visual. That said, it also creates an easy opportunity for manipulation by bad actors. Based on research with people around the world, we know that false news spreads in many different forms, varying from country to country. For example, in the US, people say they see more misinformation in articles, whereas in Indonesia, people say they see more misleading photos. However, these categories are not distinct. The same hoax can travel across different content types, so it's important to build defenses against misinformation across articles, as well as photos and videos.

A hoax traveling across different content types

A hoax in the US claiming that NASA confirmed that the Earth will go dark for several days appeared in both a video and an article.



What's next?

We know that fighting false news is a long-term commitment as the tactics used by bad actors are always changing. As we take action in the short-term, we're also continuing to invest in more technology and partnerships so that we can stay ahead of new types of misinformation in the future. Learn more about our fight against misinformation in [Facing Facts](#).

Category: Integrity and Security · News Feed FYI · Product News

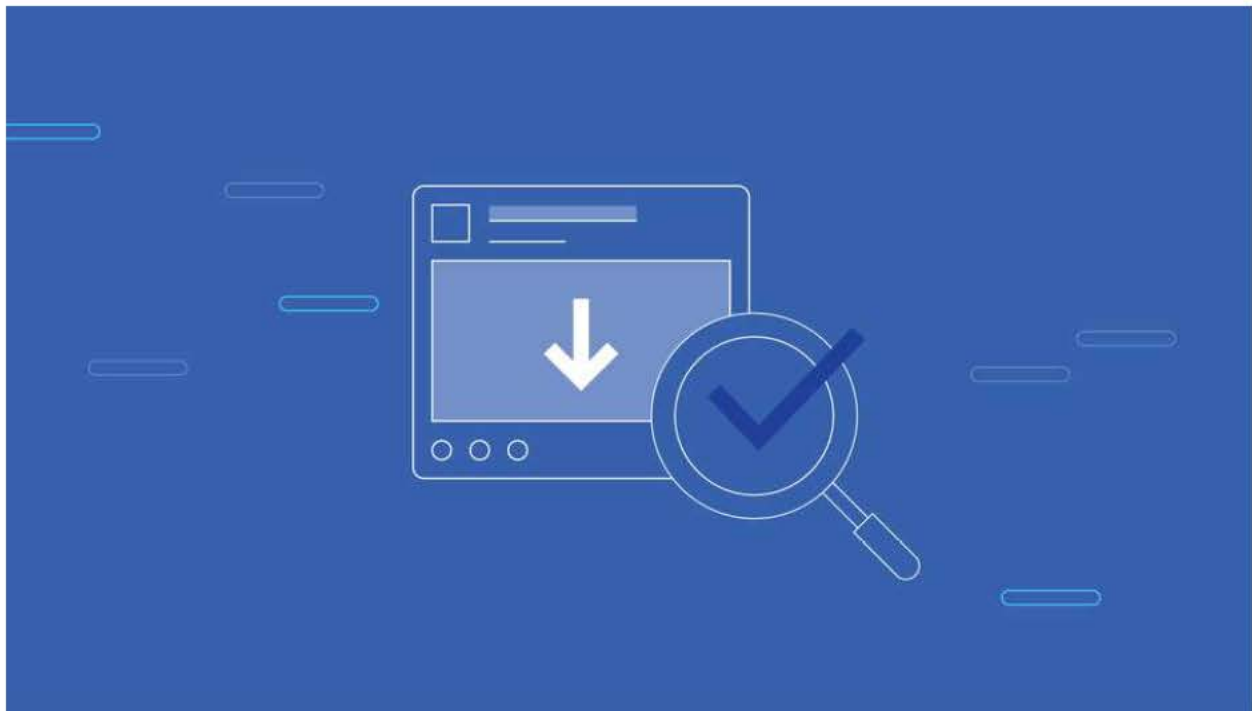
Tags: False News · Photos · Video

EXHIBIT G

facebook Newsroom

June 21, 2018

Increasing Our Efforts to Fight False News



By Tessa Lyons, Product Manager

Over the last year and half, we have been committed to [fighting false news](#) through a combination of technology and human review, including removing fake accounts, partnering with fact-checkers, and promoting news literacy. This effort will never be finished and we have a lot more to do. Today, we're announcing several updates as part of this work:

- Expanding our fact-checking program to new countries
- Expanding our test to fact-check photos and videos
- Increasing the impact of fact-checking by using new techniques, including identifying duplicates and using Claim Review
- Taking action against new kinds of repeat offenders
- Improving measurement and transparency by partnering with academics

Expanding our fact-checking program to new countries. Since we first launched the [third-party fact-checking program](#) last spring, we've expanded to [14 countries](#) and have plans to scale to more countries by the end of the year. These certified, independent fact-checkers rate the accuracy of stories on Facebook, helping us reduce the distribution of stories rated as false by an average of 80%.

Expanding our test to fact-check photos and videos. One challenge in fighting misinformation is that it manifests itself differently across content types and countries. To address this, we expanded our [test to fact-check photos and videos](#) to four countries. This includes those that are manipulated (e.g. a video that is edited to show something that did not really happen) or taken out of context (e.g. a photo from a previous tragedy associated with a different, present day conflict).



Increasing the impact of fact-checking by using new techniques. With more than a billion pieces of content posted every day, we know that fact-checkers can't review every story one-by-one. So, we are looking into new ways to identify false news and take action on a bigger scale.

- Machine learning helps us identify duplicates of debunked stories. For example, a fact-checker in France debunked the claim that you can save a person having a stroke by using a needle to prick their finger and draw blood. This allowed us to identify over 20 domains and over 1,400 links spreading that same claim.

- Also, we're going to start working with our fact-checking partners to use [Schema.org's Claim Review](#), an open-source framework used by various technology companies and fact-checking organizations. This will make it easier for fact-checkers to share ratings with Facebook and help us respond faster, especially in times of crisis.

Taking action against new kinds of repeat offenders. Historically, we have used ratings from fact-checkers to identify Pages and domains that repeatedly share false news. We then take action by reducing their distribution and removing their ability to monetize. To help curb foreign interference in public discourse, we are beginning to use machine learning to help identify and demote foreign Pages that are likely to spread financially-motivated hoaxes to people in other countries.

Improving measurement and transparency by partnering with academics. In April, we announced a new [initiative](#) to help provide independent research about the role of social media in elections, as well as democracy more generally. The elections research commission is in the process of hiring staff and establishing the legal and organizational procedures necessary to becoming fully independent. In the coming weeks, the commission will release a website and then its first request for proposals, to measure the volume and effects of misinformation on Facebook.

We're currently working with the commission to develop privacy-protected data sets, which will include a sample of links that people engage with on Facebook. The academics selected by the commission will be able to study these links to better understand the kinds of content being shared on Facebook. Over time, this externally-validated research will help keep us accountable and track our progress.

Category: [Integrity and Security](#) · [News Feed FYI](#)

Tags: [False News](#)

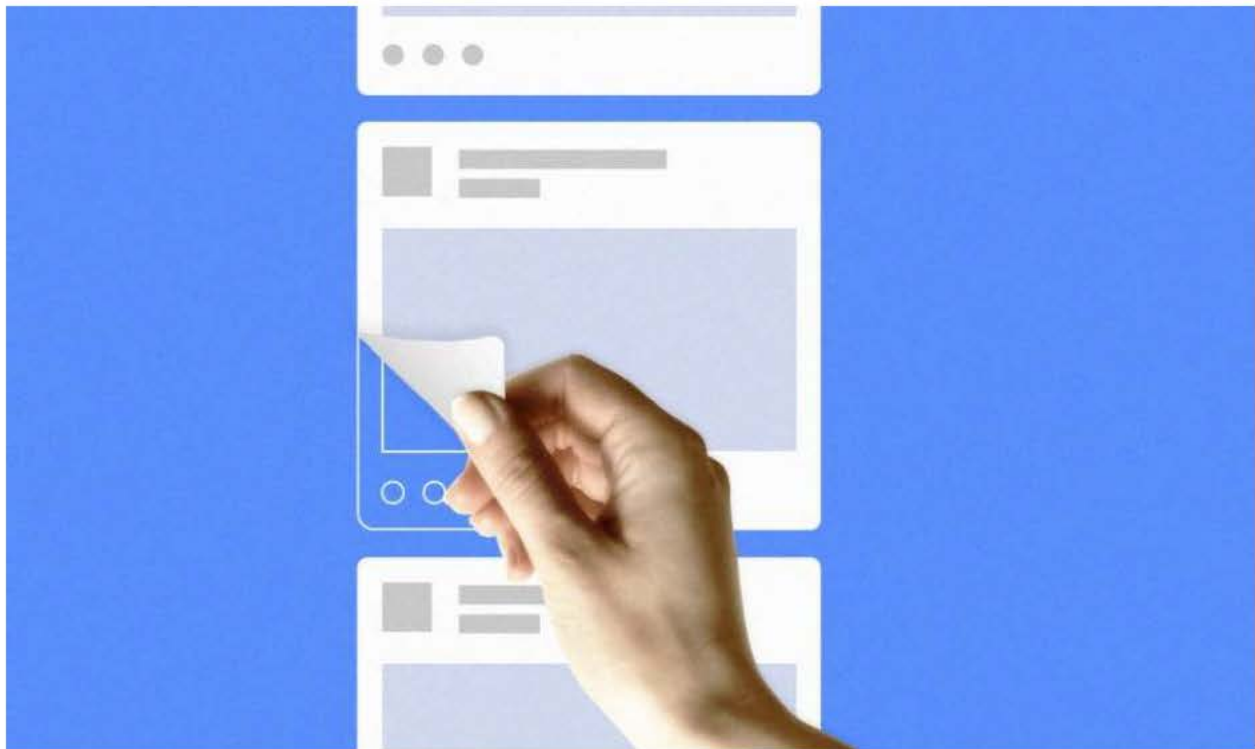
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EXHIBIT H

facebook Newsroom

October 19, 2018

The Hunt for False News



By Antonia Woodford, Product Manager

Every day, our team fights the spread of false news through a combination of technology and assessments from independent [third-party fact-checkers](#). With every false story that surfaces, we learn a bit more about how misinformation takes shape online and, hopefully, how we can detect it earlier. In this new series, we'll look at some pieces of false news that recently circulated on Facebook — both those we've caught and some we missed.



What we saw

This summer, a [video](#) featuring CCTV footage was re-shared by multiple accounts across several social networks. In the video, a man wearing a white robe and a shemagh, or head scarf, spits in the face of a blonde woman in what appears to be a hospital reception station. The accompanying caption reads, “Man from Saudi spits in the face of the poor receptionist at a Hospital in London then attacks other staff.”

Was it true?

While the video is real, [the AFP reports](#), the incident occurred in a veterinary hospital in Kuwait in 2017 and was being recirculated this summer with a falsified caption.

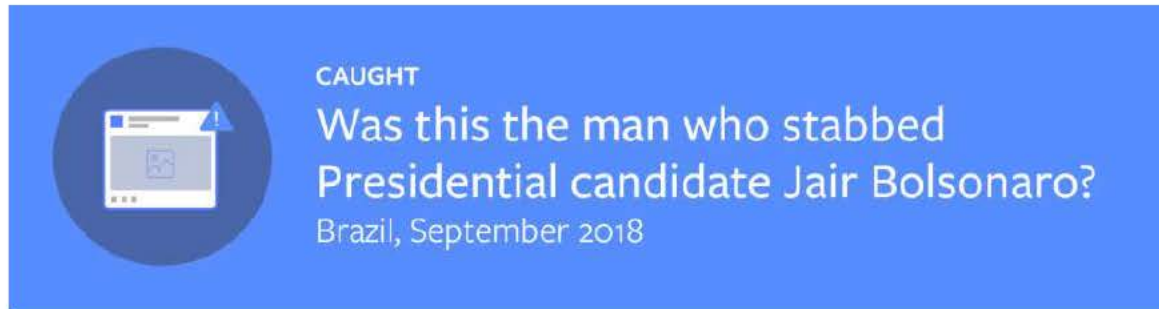
What to know

One of the primary types of [video- and photo-based misinformation](#) involves old images or videos paired with captions or commentary that misrepresent their context. These posts are often used to [fuel xenophobic sentiments](#) and are [often targeted at migrants and refugees](#), as the International Fact-Checking Network — the association that certifies the third-party fact-checkers we partner with — has explained. On Facebook, we’ve seen years-old images of violent acts, protests and war zones reposted and used to inflame current racial or ethnic tensions.

How we found it

There are two primary ways we find stories that are likely to be false: either we use [machine learning](#) to detect potentially false stories on Facebook, or else they’re identified by our third-party fact-checkers themselves. In this case, the [AFP](#) found the out-of-context video.

Once a potentially false story has been found — regardless of how it was identified — fact-checkers review the claims in the story, rate their accuracy and provide an explanation as to how they arrived at their rating. The [AFP](#) investigated this video and its caption and submitted a “false” [rating and explainer article](#), which led us to reduce its distribution in News Feed.



What we saw

Following the September 6 stabbing in Juiz de Fora, Brazil, of Representative Jair Bolsonaro, a candidate in Brazil's presidential election, a photo circulated on Facebook of a man next to Senator Gleisi Hoffmann. The caption claimed that the man in the photo was Bolsonaro's attacker.

Was it true?

Brazilian fact-checker [Aos Fatos](#) reviewed the photo and found that not only was the man standing next to Hoffman not Bolsonaro's attacker, the photo was taken at an event in a completely different city, Curitiba.

What to know

Violent events like the attack on Bolsonaro can lead to a wave of misinformation about perpetrators, with fabricated posts making false claims about an assailant's identity and ideological motivations. Similar internet memes have circulated in the US following events like the Las Vegas shooting in 2017 and the Stoneman Douglas High School shooting in 2018.

How we found it

Our machine learning model identified this photo as being potentially false, and Brazilian fact-checker [Aos Fatos](#) reviewed the photo. They determined that the man pictured was not the attacker and that the event depicted was not in Juiz de Fora.

Based on [Aos Fatos](#)' "false" rating, we demoted the image in News Feed. We were also able to use photo detection technology to identify and demote thousands of identical photos that had been natively uploaded to Facebook. [Using machine learning to find duplicates of debunked stories](#) is an important technique for both [photo-based](#) and [article-based misinformation](#). Because so much content is posted to Facebook every day, automation helps make the duplication detection process much more efficient, allowing us to find more instances of misinformation, faster.



What we saw

This story, published by the website World Facts FTW, claimed that NASA was looking to compensate volunteers up to \$100,000 to participate in 60-day “bed rest studies.” The headline certainly seemed enticing — the post racked up millions of views on Facebook.

Was it true?

US-based fact-checker Politifact investigated this story and while they found that NASA *has* paid people to stay in bed for long periods of time, the headline of this particular story was misleading. The photos in the World Facts FTW article came from a 2015 Vice article about a NASA medical research study for which the author stayed in bed for 70 days but was only paid \$18,000, not \$100,000. (Politifact used a reverse image search to find the Vice article.) Politifact couldn’t get verification for the \$100,000 claim from either NASA and World Facts FTW, so they rated the article’s central claim as false.

What to know

We’re getting better at detecting and enforcing against false news, even as perpetrators’ tactics continue to evolve. And while we caught and reduced the distribution of many pieces of misinformation on Facebook this summer, there are still some we miss. This can happen when:

- We fail to identify the misinformation at all
- We identify a piece of content as misinformation, but after it’s already gone viral
- We identify a piece of misinformation early, but it goes viral in the time it takes for fact-checkers to research it and provide a veracity rating

In this particular case, we were able to identify this older article that had been circulating on Facebook for months, using an improved similarity detection process we’ve implemented. It took us too long to enforce against this piece, and we continue to develop new technology to catch these kinds of stories in the future, before they go viral.

How we found it

This article was originally posted in September 2017. In July 2018, US-based fact-checker [PolitiFact](#) investigated the story and, as described above, determined the central claim was false.

Our similarity detection process matched the “false” verdict from the investigation article on PolitiFact’s website to the instance of the World Fact FTW article that was circulating on Facebook. Based on this potential match, our system enqueued the version of the story that was circulating on Facebook to to our network of fact-checkers and [The Weekly Standard](#) reviewed it and also assigned it a “false” rating. Based on this rating, we demoted all Facebook posts linking to the article.

Category: [Integrity and Security](#)

Tags: [False News](#)

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