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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

THE INFORMED CONSENT ACTION  
NETWORK and DEL BIGTREE,

Plaintiffs,

v.

YOUTUBE LLC and FACEBOOK, INC.,

Defendants.

CASE NO.: 4:20-cv-09456-JST

**DEFENDANTS' NOTICE OF  
MOTION AND MOTION TO  
DISMISS FIRST AMENDED  
COMPLAINT; MEMORANDUM OF  
POINTS AND AUTHORITIES IN  
SUPPORT THEREOF**

Hon. Jon S. Tigar  
Courtroom 6 – 2nd floor  
Date: May 27, 2021  
Time: 2:00 p.m.

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**NOTICE OF MOTION AND MOTION TO DISMISS**

PLEASE TAKE NOTICE THAT, on May 27, 2021, at 2:00 p.m., or as soon thereafter as the matter may be heard, in Courtroom 6 of the United States District Court for the Northern District of California, Oakland Division, this Motion to Dismiss will be heard. Facebook, Inc. and YouTube, LLC move to dismiss the First Amended Complaint (“FAC”) pursuant to Federal Rule of Civil Procedure 12(b)(6). This Motion to Dismiss is based on this Notice of Motion and the Memorandum of Points and Authorities.

**STATEMENT OF REQUESTED RELIEF**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Facebook and YouTube request that the Court dismiss the FAC with prejudice.

**MEMORANDUM OF POINTS AND AUTHORITIES**

Plaintiffs The Informed Consent Action Network and Del Bigtree (collectively, “Plaintiffs”) claim that Defendants YouTube LLC (“YouTube”) and Facebook, Inc. (“Facebook”) violated the First Amendment when they removed Plaintiffs’ content and suspended their accounts. This claim fails as a matter of law and in fact inverts the relevant First Amendment protections.

The videos that Plaintiffs posted on YouTube and Facebook repeatedly asserted that wearing a mask interferes with the development of children’s brains, belittled people who abide by government-imposed quarantine, and actively encouraged viewers to contract COVID-19. While they reached their decisions independently, both YouTube and Facebook expressly prohibit such misleading health content. In an effort to turn Defendants’ editorial decisions into a literal federal case, Plaintiffs advance a cause of action under *Bivens*, asserting that Defendants violated the First Amendment by applying their rules to removing this material. Plaintiffs’ claim runs headlong into an unbroken series of cases—including the Ninth Circuit’s controlling decision in *Prager University v. Google LLC*, 951 F.3d 991 (9th Cir. 2020)—holding that private online platforms are not state actors.

Trying to evade this authority, Plaintiffs focus on a handful of individual members of the House of Representatives and “various Congressional committees,” who Plaintiffs claim used

Defendants as “cats paw[s]” to censor Plaintiffs’ speech. Plaintiffs’ theory is that because members of Congress expressed concern about the spread of online health-related misinformation, Defendants’ decisions to remove such material from their private property were somehow transformed into government censorship. That is not the law. Private companies are not constitutionally disabled from combatting what they consider to be harmful content on their platforms merely because certain members of Congress have offered similar views. *See, e.g., Daniels v. Alphabet Inc.*, 2021 WL 1222166, at \*3 (N.D. Cal., Mar. 31, 2021) (DeMarchi, J.) (dismissing virtually identical First Amendment claim against Google and YouTube based on theory that “Congressional representatives coerced defendants into taking action to remove content from the YouTube platform”). Beyond that, Plaintiffs have no right to sue Defendants under *Bivens*: that cause of action allows claims only against *individual federal officials*; it does not apply to claims against private corporations.

In addition to failing on its own terms, Plaintiffs’ *Bivens* claim is barred by the First Amendment, which protects Defendants’ right to decide not to allow harmful misinformation on their platforms and bars Plaintiffs from attempting to use this Court to override Defendants’ exercise of editorial discretion.

None of these defects can be cured by further amendment. Prior to moving to dismiss Plaintiffs’ initial complaint, Defendants identified each defect in a letter urging Plaintiffs to drop this lawsuit or, if they believe these defects could somehow be cured, to come forward with proposed amendments that would address them. *See White Ex. 1.*<sup>1</sup> Plaintiffs chose to stand on their original Complaint, stating that “[t]he complaint itself provides more than an adequate and good faith basis to proceed.” *White Ex. 2.* Then, after Defendants filed their motion to dismiss, Plaintiffs’ reversed course: they filed an amended complaint that abandoned their implied covenant claims and advanced only a superficially modified *Bivens* claim. Defendants wrote to Plaintiffs again, expressing surprise at Plaintiffs’ about-face. As defendants explained:

At this point, it is incumbent on you to have pleaded the facts and allegations that you believe support your claims—before we expend additional resources litigating

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<sup>1</sup> Citations to “White Ex. \_\_” are to exhibits attached to the Declaration of Lauren Gallo White.

any further motions to dismiss. ... If we do not hear from you, we will understand that ICAN has pleaded its best case, and that we, and more importantly the Court, can now evaluate that complaint to conclusively determine whether it can plausibly state a claim under applicable legal standards.

White Ex. 3. Plaintiffs have not responded. Given that choice, and because the First Amendment is meant to protect against the “burden and expense of litigating,” *First Nat’l Bank of Boston v. Bellotti*, 435 U.S. 765, 785, n.21 (1978), dismissal should be with prejudice.

## **BACKGROUND**

### **A. YouTube, Facebook, And Their Content Policies**

YouTube and Facebook are popular online services for sharing videos and related content. ¶ 28.<sup>2</sup> They offer separate services and operate independently of each other. The use of both platforms is governed by rules and policies that make clear that certain kinds of content are not allowed and that YouTube and Facebook have discretion to remove unwanted material from their services. ¶¶ 30-31, 61. More specifically, to create a channel and post videos, Plaintiffs agreed to YouTube’s Terms of Service and the incorporated Community Guidelines. See ¶¶ 22, 68; Compl. Ex. A;<sup>3</sup> Terms of Service, White Ex. 4 (YouTube’s “TOS”); Community Guidelines, White Ex. 5 (YouTube’s “Community Guidelines”).<sup>4</sup> Similarly, to create a Page and use Facebook, Plaintiffs agreed to Facebook’s Terms of Service and the incorporated Community Standards. See ¶ 22, 75; White Ex. 6 (Facebook’s “TOS”); White Exs. 7, 11, 12 (Facebook’s “Community Standards”).

#### **1. YouTube’s Terms of Service and Rules Against Medical Misinformation**

YouTube’s Terms of Service provide that “YouTube is under no obligation to host or serve Content.” White Ex. 4 at 4. The TOS put users on notice that, “[i]f you choose to upload

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<sup>2</sup> References to “¶ \_\_” are references to the FAC.

<sup>3</sup> Citations to Compl. Ex. \_\_ are to the exhibits attached to the original Complaint. Though these exhibits were not reattached to the FAC, they are cited and quoted within the FAC. *See, e.g.,* ¶¶ 31, 69, 74.

<sup>4</sup> Defendants’ respective terms of user agreements and incorporated content policies are properly before the Court on this motion to dismiss because those documents are expressly referenced in Plaintiffs’ FAC. *See, e.g.,* ¶¶ 68, 75 (citing YouTube and Facebook’s respective TOS); ¶¶ 61, 63-66 (citing and quoting YouTube and Facebook’s respective Community Guidelines and content policies); *accord Knievel v. ESPN*, 393 F.3d 1068, 1076 (9th Cir. 2005).

Content, you must not submit to the Service any Content that does not comply with this Agreement (including the YouTube Community Guidelines).” *Id.* at 7-8. The TOS also state that “[i]f we reasonably believe that any Content is in breach of this Agreement or may cause harm to YouTube, our users, or third parties, we may remove or take down that Content in our discretion.” *Id.* at 9. The TOS expressly incorporate the Community Guidelines, which describe in detail the types of content that are not allowed on YouTube. YouTube’s policy on child safety, for example, forbids “encouraging minors to do dangerous activities.” White Ex. 8 at 1. Similarly, YouTube’s policy on harmful or dangerous content forbids, among other things, “[s]howing viewers how to perform activities meant to kill or maim others.” White Ex. 9 at 1. Last year, in keeping with these rules, YouTube specifically incorporated a COVID-19 misinformation policy into its Community Guidelines. White Ex. 10 (“COVID Policy”); ¶ 61. The COVID Policy clarifies that YouTube “doesn’t allow content that spreads medical misinformation that contradicts local health authorities’ or the World Health Organization’s (WHO) medical information about COVID-19.” White Ex. 10 at 1; ¶ 60 (quoting same). This expressly includes “Claims about COVID-19 vaccinations that contradict expert consensus from local health authorities or WHO,” and “Content that disputes the efficacy of local health authorities’ or WHO’s guidance on physical distancing or self-isolation measures to reduce transmission of COVID-19.” White Ex. 10 at 1.

In addition to reserving the right to remove content, YouTube’s agreements make clear that YouTube has the right to suspend or terminate users who violate YouTube’s rules or submit material that YouTube does not allow on its service. As the Terms of Service explain: “YouTube may suspend or terminate your access, your Google account, or your Google account’s access to all or part of the Service” for multiple reasons, including if “you materially or repeatedly breach this Agreement,” or if “we believe there has been conduct that creates (or could create) liability or harm to any user, other third party, YouTube or our Affiliates.” White Ex. 4 at 10.

## 2. Facebook’s Terms of Service and Rules Against Medical Misinformation

Facebook’s Terms of Service are similar. They provide that a user may not use Facebook “to do or share anything: [1] That violates these Terms, our Community Standards, and other

terms and policies that apply to your use of Facebook. [2] That is unlawful, misleading, discriminatory or fraudulent. [3] That infringes or violates someone else's rights, including their intellectual property rights." White Ex. 6 at 3. Facebook's Community Standards, which are expressly incorporated into its Terms, elaborate on the kind of content that Facebook may remove. Facebook's safety policy, for example, prohibits content that "intentionally or unintentionally celebrate[s] or promote[s] suicide or self-injury." White Ex. 11 at 1. Similarly, Facebook's policy on violence and criminal behavior bars content that promotes "[h]arm against people," including "[p]romoting or advocating for harmful miracle cures for health issues." White Ex. 12 at 1. Facebook has also elaborated on how its policies apply in light of the ongoing COVID-19 pandemic and has explained that it prohibits content "[c]oordinating, depicting, admitting to or promoting active and deliberate spread of communicable diseases by you or your associates." *Id.* at 1. Likewise, its policies prohibit content "coordinating interference with the administration of the COVID-19 vaccine," and "calling to action, advocating, or promoting that others not get the COVID-19 vaccine." *Id.* at 3.

Facebook expressly retains the authority to "remove or restrict access to content that is in violation of these provisions." White Ex. 6 at 3. In addition, the Terms provide that Facebook may "suspend or permanently disable access to your account" if "we determine that you have clearly, seriously or repeatedly breached our Terms or Policies, including in particular our Community Standards." *Id.* at 4.

## **B. Informed Consent Action Network**

According to the First Amended Complaint, ICAN is a non-profit network that "investigates and disseminates information regarding public health safety issues," and Del Bigtree is the host of the HighWire, a show that "sheds light on governmental oversight in the area of vaccine and drug development." ¶¶ 15-17.

### **1. Plaintiffs' Videos on YouTube and Facebook**

The FAC expressly references and puts at issue the contents of Plaintiffs' videos, which therefore may be considered by the Court on this motion. ¶¶ 67-69, 72-73 (referencing Ex. B attached to the Complaint); *accord Knievel*, 393 F.3d at 1076. Plaintiffs' videos repeatedly

1 contradict both local health authorities and WHO's medical information about COVID-19. *See*  
 2 White Exs. 13 to 15.<sup>5</sup> For example, Plaintiffs' videos often tout the importance of *not* wearing  
 3 masks and repeatedly assert that COVID-19 is a mild sickness that people should want to catch.  
 4 White Ex. 13 at 7:2-24; White Ex. 14 at 5:8-10; *see also* Compl., Ex. B at 12-13, 4-5  
 5 (referencing same two videos). In the same vein, Plaintiffs' videos expressly encourage viewers  
 6 to ignore government restrictions and break quarantine. White Ex. 13 at 6:19-25; 7:1-2; 7:21-24.

7 It is not surprising that videos like these found themselves running afoul of each  
 8 Defendant's content rules. Thus, the FAC alleges that, on July 3, 2020, YouTube "took down a  
 9 video featuring a doctor discussing hydroxychloroquine, stating that this video violated  
 10 YouTube's community guidelines." ¶ 69. That video was titled "DR. ZELENGO: HCQ  
 11 DENIERS ARE 'GUILTY OF MASS MURDER.'" Compl. Ex. B at 2. Likewise, on July 7,  
 12 YouTube took down a video called "MASK TEST PROVES TOXIC FOR CHILDREN," *Id.* at  
 13 4; on July 9, it took down "THIS LIVE MASK TEST SHOCKS VIEWERS," *id.* at 6; and on  
 14 July 28, it took down "MASKS ARE A JOKE," *id.* at 8, "SHOULD YOU REALLY WEAR A  
 15 MASK?", *id.* at 10, and "WE NEED TO CATCH THAT COLD!", *id.* at 12. The next day (July  
 16 29), YouTube took down "ICAN VS CDC." *Id.* at 15.

17 After removing seven videos in less than a month under YouTube's COVID-  
 18 misinformation policy, YouTube terminated ICAN's channel on July 29, 2020. ¶ 11. Plaintiffs  
 19 were well aware this was possible; indeed, one of their videos expressly acknowledged that their  
 20 content might get Plaintiffs kicked off the platform, and the video goes on to provide a secondary  
 21 web address for viewers to find their content should that happen. White Ex. 15 at 4:9-16 ("Or  
 22 perhaps, you're on our website, thehighwire.com, which I want all of you to sign up to in case  
 23 we ever get kicked off of Facebook or some other social media platform -- if you're on  
 24 thehighwire.com or any of those platforms, all you do is text 33222 and type in ICAN in the  
 25

26  
 27 <sup>5</sup> Attached to the Declaration of Lauren Gallo White are transcripts of the following videos,  
 28 alleged in the FAC to have been uploaded to YouTube by ICAN and titled: "WE NEED TO  
 CATCH THAT COLD!" (White Ex. 13; *see* Compl. Ex. B at 12-13); "MASK TEST PROVES  
 TOXIC FOR CHILDREN" (White Ex. 14; *see* Compl. Ex. B at 4-5); and "ICAN VS CDC"  
 (White Ex. 15; *see* Compl. Ex. B at 15-16).

1 message, and we will send you the information from today's show."); *see also* Compl. Ex. B. at  
 2 15-16 (referencing same video).

3 Acting independently of YouTube, Facebook deactivated ICAN's page on November 21,  
 4 2020. ¶ 11. This decision also followed Facebook's repeated removal of offending content from  
 5 ICAN's Page. Specifically, between July and November, Facebook removed no less than six  
 6 posts. ¶¶ 73-74 (referencing Exhibit C attached to the Complaint). Many of these—with titles  
 7 like "MASK TEST PROVES TOXIC FOR CHILDREN," "MASKS ARE A JOKE," and "WE  
 8 NEED TO CATCH THIS COLD!"—violated Facebook's "Community Standards on  
 9 misinformation that can cause physical harm." ¶ 73; Compl. Ex. C at 5, 7, 10, 12-14. But at least  
 10 one post was removed for hate speech. Compl. Ex. C at 3, 6. After a clear warning that "[y]our  
 11 Page is at risk of being unpublished because of continued Community Standards violations,"  
 12 Compl. Ex. C at 9, Facebook finally unpublished the Page.

## 13 2. Plaintiffs' Allegations About Members of Congress

14 In the FAC, Plaintiffs attempt to connect Defendants' content moderation decisions to  
 15 Congressman Adam Schiff and other members of Congress, who the FAC alleges pressured  
 16 Defendants to remove Plaintiffs' content. ¶¶ 5, 7-14. Plaintiffs do not suggest these legislators  
 17 singled out ICAN or Mr. Bigtree or urged Defendants to remove their content specifically. Nor  
 18 do they point to any actual legal mandate, threats, or coercive action that the legislators aimed at  
 19 Google or Facebook. Instead, Plaintiffs point only to the following:

- 20 • In letters dated February 14, 2019 and April 29, 2020, Mr. Schiff wrote to  
 21 Google, Facebook, and other "social media companies" to request more  
 22 information about the steps they were taking to "curb vaccine  
 23 'misinformation,'" and to urge them to "tackle coronavirus misinformation."  
 24 ¶¶ 42-43, 47.
- 25 • At a June 13, 2019 committee hearing, "Schiff openly challenged the  
 26 continued appropriateness of § 230 [*i.e.*, 47 U.S.C. § 230] immunity as regards  
 27 social media networks." ¶ 35; *see also* ¶ 36 (then-President Elect Biden "has  
 28 also openly criticized the § 230 immunity").

- 1 • In April 2019, Representative Jerrold Nadler expressed concerns over “direct  
2 regulation of social media censorship by law and said, ‘Let’s see what happens  
3 by just pressuring them first.’” ¶ 53.
- 4 • Around April 2019, Representative Cedric Richmond “told Defendants to  
5 restrict content lest they face increased Congressional regulations.” ¶ 54.
- 6 • In hearings before the Financial Services Committee in October 2019,  
7 Representative Maxine Waters “quizzed Zuckerberg on Facebook’s steps to  
8 combat misinformation and voter suppression,” and “suggested policymakers  
9 should consider breaking up Facebook.” ¶ 58.
- 10 • “Various Congressional Committees have been working relentlessly to address  
11 issues concerning ‘misinformation’ on social media.” ¶ 55.

12 These allegations are the sum total of government action alleged in the FAC.

13 Nevertheless, based on this theory, Plaintiffs filed this lawsuit on December 30, 2020,  
14 asserting claims against YouTube and Facebook under both the First Amendment (through the  
15 implied cause of action recognized in *Bivens*) and for violation of the implied covenant of good  
16 faith and fair dealing. Compl. ¶¶ 72-93. Plaintiffs’ initial Complaint sought damages and  
17 injunctive relief. Compl., Prayer for Relief at 1-3. After Defendants moved to dismiss the  
18 Complaint (Dkt. 40), and after Facebook moved to strike Plaintiffs’ implied covenant claim  
19 pursuant to California’s anti-SLAPP statute, Cal. Civ. Proc. Code § 425.16 (Dkt. 41), Plaintiffs  
20 abandoned their implied covenant claims and their prayer for monetary damages.<sup>6</sup> The FAC now  
21 asserts a single claim under *Bivens* for alleged violation of the First Amendment (¶¶ 85-94) and  
22 seeks a mandatory injunction compelling Defendants to “restore” their YouTube channel and  
23  
24

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25 <sup>6</sup> Facebook intends to seek fees for the preparation of its independent anti-SLAPP motion.  
26 See *Moore v. Liu*, 69 Cal. App. 4th 745, 752 (1999) (“Persons who threaten the exercise of  
27 another’s constitutional rights to speak freely ... should be adjudicated to have done so, not  
28 permitted to avoid the consequences of their actions by dismissal of the SLAPP suit when a  
defendant challenges it.”); *Coltrain v. Shewalter*, 66 Cal. App. 4th 94, 106 (1998) (“Otherwise,  
SLAPP plaintiffs could achieve most of their objective with little risk—by filing a SLAPP suit,  
forcing the defendant to incur the effort and expense of preparing a special motion to strike, then  
dismissing the action without prejudice.”).

Facebook Page and precluding Defendants from enforcing their rules against Plaintiffs in the future. FAC, Prayer for Relief at 1-3.

### ARGUMENT

To survive a motion under Rule 12(b)(6), “[t]hreadbare recitals of the elements of a cause of action, supported by mere conclusory statements, do not suffice.” *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009). Instead, Plaintiffs must allege “factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged.” *Id.* The Court is not required to “assume the truth of legal conclusions merely because they are cast in the form of factual allegations.” *Fayer v. Vaughn*, 649 F.3d 1061, 1064 (9th Cir. 2011). Nor should the Court accept allegations that rest on “unwarranted deductions of fact[] or unreasonable inferences.” *In re Gilead Scis. Sec. Litig.*, 536 F.3d 1049, 1055 (9th Cir. 2008).

#### **I. PLAINTIFFS CANNOT STATE A *BIVENS* CLAIM FOR VIOLATION OF THE FIRST AMENDMENT**

Plaintiffs claim that Defendants violated the First Amendment when they removed Plaintiffs’ videos and channels from their platforms. ¶¶ 85-92. This claim, which is asserted under the Supreme Court’s decision in *Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics*, 403 U.S. 388 (1971), fails as a matter of law on multiple, independent grounds.

##### **A. Facebook And YouTube Are Private Parties, Not State Actors**

“The Free Speech Clause does not prohibit *private* abridgment of speech.” *Manhattan Cmty. Access Corp. v. Halleck*, 139 S. Ct. 1921, 1928 (2019). Plaintiffs, of course, do not dispute that Facebook and YouTube are private parties, not state actors. ¶¶ 1, 88. And under settled law, their content-moderation decisions are not subject to First Amendment constraints. The Ninth Circuit made that clear in *Prager*, expressly holding that YouTube is not a state actor and cannot be sued under the First Amendment for its editorial decisions about whether and under what conditions to display content on its private platform. *Prager*, 951 F.3d at 994, 997-99 (“[D]espite YouTube’s ubiquity and its role as a public-facing platform, it remains a private forum, not a public forum subject to judicial scrutiny under the First Amendment.”). The Ninth Circuit’s decision echoes a long and unbroken line of cases—before and after *Prager*—rejecting similar

1 First Amendment claims against private online service providers. *See, e.g., Freedom Watch, Inc.*  
 2 *v. Google, Inc.*, 368 F. Supp. 3d 30, 40 (D.D.C. 2019), *aff'd*, 816 F. App'x 497 (D.C. Cir. May,  
 3 27, 2020), *petition for cert. filed*, No. 20-969 (U.S. Jan. 2, 2021); *Howard v. AOL*, 208 F.3d 741,  
 4 754 (9th Cir. 2000); *Fed. Agency of News, LLC v. Facebook, Inc.*, 395 F. Supp. 3d 1295, 1308-  
 5 1314 (N.D. Cal. 2020).<sup>7</sup>

6 Plaintiffs try to get around these precedents by asserting that YouTube and Facebook  
 7 “should be treated as state actors because they acted based on the encouragement, coercion,  
 8 and/or threats of powerful government officials.” ¶ 89; *see also, e.g.,* ¶¶ 42-51. Plaintiffs seem to  
 9 be trying to invoke the so-called “state compulsion test” for state action. But this test is  
 10 concerned with whether the government can be held liable for the acts of a private party. *See*  
 11 *Sutton v. Providence St. Joseph Med. Ctr.*, 192 F. 3d 826, 838 (9th Cir. 1999) (“[T]he  
 12 government cannot escape liability when it compels a result, even though the government does  
 13 not actually engage in the unlawful act but, instead, pressures another to do so.” (citing *Blum v.*  
 14 *Yaretsky*, 457 U.S. 991, 1004-1005 (1982))). Because Facebook and YouTube are private actors,  
 15 they cannot be held liable under a compulsion theory. And in any event, under established law,  
 16 Plaintiffs’ actual allegations fall far short of any plausible theory of government compulsion (or  
 17 any other theory of state action).

#### 18 **B. The Government-Compulsion Theory Creates No Basis For Holding Private** 19 **Entities Liable As State Actors**

20 As an initial matter, Plaintiffs’ effort to use a compulsion theory to assert a constitutional  
 21 claim directly against private parties flies in the face of Ninth Circuit precedent. *Sutton* held

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22 <sup>7</sup> *See also, e.g., Davison v. Facebook, Inc.*, 370 F. Supp. 3d 621 (E.D. Va. 2019), *aff'd*, 774  
 23 F. App'x 162 (4th Cir. 2019), *cert. denied*, 140 S. Ct. 1111 (2020); *Ebeid v. Facebook, Inc.*, 2019  
 24 WL 2059662, at \*6 (N.D. Cal. May 9, 2019); *Green v. YouTube, LLC*, 2019 WL 1428890, at \*4  
 25 (D.N.H. Mar. 13, 2019); *Fehrenbach v. Zeldin*, 2018 WL 4242452, at \*2-3 (E.D.N.Y. Aug. 6,  
 26 2018); *Nyabwa v. FaceBook*, 2018 WL 585467, at \*1 (S.D. Tex. Jan. 26, 2018); *Quigley v. Yelp,*  
 27 *Inc.*, 2018 WL 7204066, at \*3 (N.D. Cal. Jan. 22, 2018); *Shulman v. Facebook.com*, 2017 WL  
 28 5129885, at \*4 (D.N.J. Nov. 6, 2017); *Kim v. Apple, Inc.*, 2014 WL 3056136, at \*2 (D.D.C. July  
 7, 2014), *aff'd* 582 F. App'x 3 (D.C. Cir. 2014); *Kinderstart.com, LLC v. Google, Inc.*, 2007 WL  
 831806, at \*13-14 (N.D. Cal. Mar. 16, 2007); *Forbes v. Facebook, Inc.*, 2016 WL 676396, at \*2  
 (E.D.N.Y. Feb. 18, 2016); *Young v. Facebook, Inc.*, 2010 WL 4269304, at \*2 (N.D. Cal. Oct. 25,  
 2010); *cf. Rutenburg v. Twitter, Inc.*, 2021 U.S. Dist. LEXIS 27539 (N.D. Cal. Feb. 11, 2021)  
 (issuing *sua sponte* Order to Show Cause why case asserting First Amendment claim against  
 Twitter for terminating user account should not be dismissed for lack of state action).

expressly that “a plaintiff must show ‘something more’ than state compulsion in order to hold a private defendant liable as a government actor.” *Id.* at 838. That holding reflects the fact that the foundational state compulsion cases were lawsuits brought against the government challenging actions that had been carried out through private parties. *Id.* at 836-37. For example, *Blum* involved claims against government officials (the Commissioners of the New York Department of Social Services and the Department of Health). *See* 457 U.S. at 995-96, 1003 (“This case is obviously different from those cases in which the defendant is a private party...”). In that context, the Supreme Court found no state action in the decision of private nursing homes to discharge patients without notice or a hearing. *Id.* at 1005. The Court explained that “a State normally can be held responsible for a private decision only when it has exercised coercive power or has provided such significant encouragement, either overt or covert, that the choice must in law be deemed to be that of the State.” *Id.* at 1004 (emphasis added).

As the Ninth Circuit held in *Sutton*, however, the responsibility does not run both ways: “in a case involving a private defendant, the mere fact that the government compelled a result does not suggest that the government’s action is ‘fairly attributable’ to the private defendant. Indeed, without some other nexus between the private entity and the government, we would expect that the private defendant is *not* responsible for the government’s compulsion.” *Sutton*, 192 F.3d at 838. To the contrary, “only the state actor, and not the private party, should be held liable for the constitutional violation that resulted from the state compulsion.” *Id.* (quotation marks omitted). In short, to the extent Plaintiffs’ theory is that the government used “pressure tactics to compel” YouTube and Facebook “to censor vaccine related speech,” ¶ 44, they must sue the government, not private party Defendants.

### **C. Plaintiffs’ Allegations That Members of Congress Pressured Defendants Does Not Create A Viable Basis For State Action**

Even setting aside that threshold defect, Plaintiffs’ state action theory also fails because they have neither alleged any actual state compulsion nor directly tied any such compulsion to the specific actions challenged. A theory that the government compelled private action obviously requires genuine coercion by the government. *See Heineke v. Santa Clara Univ.*, 965 F.3d 1009,

1 1013-1014 (9th Cir. 2020). And as the Ninth Circuit explained, state action can be found on such  
 2 a theory only when the government “commanded a particular result in, or otherwise participated  
 3 in, [the plaintiff’s] *specific* case.” *Id.* at 1014 (emphasis added); *accord Blum*, 457 U.S. at 1010  
 4 (no state action where government regulations did “not dictate the decision to discharge or  
 5 transfer in a particular case”); *Johnson v. Knowles*, 113 F.3d 1114, 1120 (9th Cir. 1997) (no state  
 6 action where “Plaintiffs cannot point to any state regulation or custom having the force of law  
 7 that compelled, coerced, or encouraged the Defendants to discriminate against the Plaintiffs”).

8 Applying these requirements, another court in this District very recently dismissed a  
 9 nearly identical First Amendment claim against Google and YouTube that sought to establish  
 10 state action based on some of the same letters from Adam Schiff and the same theory that  
 11 “Congressional representatives coerced defendants into taking action to remove content from the  
 12 YouTube platform that resulted in YouTube’s removal of [Plaintiff’s] videos from the YouTube  
 13 service.” *Daniels*, 2021 WL 1222166, at \*3. As Judge DeMarchi explained,

14 [Plaintiff] does not plead any facts that support his argument that the federal  
 15 government ‘coerced’ or ‘significantly encouraged’ defendants to remove his  
 16 specific Fauci and George Floyd videos from YouTube’s platform. His speculative  
 17 assertions about the possibility defendants will be subpoenaed to testify before  
 Congress or exposed to some other peril if they ignore letters from Congressional  
 representatives do not support a theory of government action.

18 *Id.* at \*6; *see also id.* (“Mr. Daniels does not allege that the federal government directed a  
 19 particular result with respect to his Fauci and George Floyd videos.”).

20 Plaintiffs’ allegations here have the same problem. Plaintiffs’ do not allege that *the*  
 21 **government** exercised any actual “coercive power” over Defendants’ content-moderation  
 22 decisions, much less that it compelled YouTube or Facebook to take the “specific” action at issue  
 23 here (the removal of Plaintiffs’ content and the suspension of their accounts). The FAC identifies  
 24 no official government action that played any role in Defendants’ actions. Instead, Plaintiffs’  
 25 compulsion theory is based on the public statements of a handful of Congressional committees  
 26 and individual members of Congress, which Plaintiffs believe somehow influenced YouTube and  
 27 Facebook. But despite extensive rhetoric (¶¶ 7-10, 32-58), the FAC’s actual factual allegations  
 28 are remarkably thin. As set out above, Plaintiff’s allegations boil down to a single vague

reference to the agendas of “various Congressional Committees” and a handful of statements by individual members of Congress—several by Adam Schiff seeking “additional information” on what Google and Facebook were doing to address vaccine misinformation, vaguely questioning “continued appropriateness of § 230” to social media platforms, and offering advice about “best practices” for COVID-19 and other health-related misinformation—and a few more from Representatives Jerrold Nadler, Cedric Richmond, and Maxine Waters regarding census misinformation, voter suppression, and a general need to regulate Defendants and other online platforms. *See supra* pp. 7-8 (quoting ¶¶ 35, 53, 54, 58).

None of this makes Defendants into state actors. Obviously, statements from Adam Schiff, Jerrold Nadler, Cedric Richmond, and Maxine Waters did not have any actual legal force; they spoke only for themselves, not for other members of Congress, much less for Congress as a whole. Nor did these Congresspeople threaten YouTube or Facebook in any way. Their statements did not direct or instruct Defendants to take any particular action, certainly not to remove content or terminate user accounts, and certainly not to terminate or remove content from *Plaintiffs’* accounts. None of these Representatives ever so much as *mentioned* Plaintiffs or their content. As a matter of law, statements like these from individual members of Congress cannot transform private content-moderation into state action.

*Daniels* is squarely on point. The plaintiff there relied on some of the same statements at issue here (including those made by Adam Schiff) in claiming that YouTube had engaged in state action. Judge DeMarchi rejected that theory:

[Plaintiff] does not plead any facts suggesting that Speaker Pelosi or Rep. Schiff were personally involved in or directed the removal of Mr. Daniels’s videos. He alleges only that they wanted certain kinds of videos removed and that his videos fell within that category ..... [S]uch allegations do not reflect the kind of governmental involvement in the conduct of private defendants that is sufficient to support a nexus theory of government action.

*Daniels*, 2021 WL 1222166, at \*7. Likewise, in *Abu-Jamal v. Nat’l Pub. Radio*, 1997 WL 527349, at \*1, \*6 (D.D.C. Aug. 21, 1997), the plaintiff challenged on First Amendment grounds NPR’s decision not to air his political commentaries. The plaintiff argued that remarks made by then-Senator Dole (among others) had directly pressured NPR specifically to cancel the program,

1 rendering NPR's otherwise private decision state action. *Id.* at \*2. The court disagreed:  
 2 "Assuming that the [Fraternal Order of Police] and individual members of Congress did call  
 3 NPR in attempts to pressure it not to air the program, not one of these people has any legal  
 4 control over NPR's actions." *Id.* at \*6.

5 The same is true here. Mr. Schiff has no legal control over Defendants or their actions.  
 6 His public statements and letters—which, again, made no reference to ICAN or its content—  
 7 lacked any legal force. Referring to such statements as "threats" (§§ 7, 89) does not change that  
 8 reality or transform Defendants' actions into those of the government. In fact, this is an even  
 9 easier case than *Abu-Jamal*. There, no state action was found even though Rep. Dole had referred  
 10 specifically to the plaintiff's broadcast and expressly urged NPR not to air it. *Cf. Daniels*, 2021  
 11 WL 1222166, at \*6 (discussing *Abu-Jamal* and rejecting state action where plaintiff "cannot  
 12 plausibly allege that Speaker Pelosi and Rep. Schiff have legal control over defendant' actions,  
 13 or that either of them ever contacted defendants about Mr. Daniels's Fauci or George Floyd  
 14 videos"). Here, in contrast, none of the members of Congress said anything about Plaintiffs or  
 15 the specific content.

16 Indeed, earlier this year, a court expressly held that Mr. Schiff's same statements about  
 17 medical misinformation had no causal connection to content-moderation decisions by Google,  
 18 Facebook, and other private social-media platforms. In *Association of American Physicians &*  
 19 *Surgeons v. Schiff*, plaintiffs who published and sought out information about vaccines sued Mr.  
 20 Schiff claiming that "a number of technology companies took several adverse actions against  
 21 them because of Congressman Schiff's statements"—the same February 14, 2019 letter and June  
 22 13, 2019 committee hearing statement at issue in this case. 2021 WL 354174, at \*2 (D.D.C. Feb.  
 23 2, 2021) ("AAPS"). The court dismissed the claim, finding that any injury plaintiffs had suffered  
 24 as a result of content-moderation decisions by online platforms was not "fairly traceable" to Mr.  
 25 Schiff's words. As the Court explained, "Plaintiffs' case depends on an analytical leap based on  
 26 bald speculation rather than allegations of fact. The open letters and public statements made by  
 27 Congressman Schiff do not mention AAPS, do not advocate for any specific actions, and do not  
 28 contain any threatening language." *Id.* at \*5. This case presents a mirror image of that same

1 problem. Just as the plaintiffs in *AAPS* could offer no plausible allegations that Mr. Schiff's  
 2 statements were the cause of private platforms' restrictive actions, Plaintiffs here have no  
 3 plausible allegation that YouTube and Facebook did what they did as the result of unlawful  
 4 coercion from Mr. Schiff's same statements (or the similar statements made by the other  
 5 members of Congress referenced in the FAC).

6 Beyond being at odds with these cases, Plaintiffs' state action theory disregards settled  
 7 legal principles. "[R]egulatory interest in a problem [does not] transform[] any subsequent  
 8 private efforts to address the problem (even those expressly designed to obviate the need for  
 9 regulation) into state action." *Mathis v. Pac. Gas & Elec. Co.*, 75 F.3d 498, 503 (9th Cir. 1996).  
 10 Indeed, even in the case of actual laws, merely "being regulated by the State does not make one a  
 11 state actor." *Halleck*, 139 S. Ct. at 1932. It follows, as Judge DeMarchi explained, that acting in  
 12 ways consistent with the *informal* wishes of a few individual lawmakers—who possess no  
 13 independent regulatory authority—cannot amount to state action: "The publicly expressed views  
 14 of individual members of Congress—regardless of how influential—do not constitute 'action' on  
 15 the part of the federal government." *Daniels*, 2021 WL 1222166, at \*6.

16 Accepting Plaintiffs' baseless theory would have far-reaching and pernicious  
 17 consequences. Plaintiffs effectively ask the Court to find that, if any of the 535 members of  
 18 Congress publicly states a view about how a private business should operate, that business  
 19 thereby becomes a state actor when it acts consistent with the legislator's suggestion. Like the  
 20 state-action theory rejected in *Halleck*, this theory "would be especially problematic in the  
 21 speech context, because it could eviscerate certain private entities' rights to exercise editorial  
 22 control over speech and speakers on their properties or platforms." 139 S. Ct. at 1932. Under  
 23 Plaintiffs' logic, a single legislator expressing a preference for online platforms to more  
 24 aggressively limit some form of objectionable content (whether pornography or hate speech or  
 25 extremist propaganda) would perversely have the exact opposite effect, constitutionally disabling  
 26 those platforms from removing such material, even where the material violates the service's own  
 27 rules for acceptable speech. In short, Plaintiffs' approach threatens to do just what the Supreme  
 28 Court has warned against: "Expanding the state-action doctrine beyond its traditional boundaries

1 would expand governmental control while restricting individual liberty and private enterprise.”  
 2 *Id.* at 1934.<sup>8</sup>

3 **D. The *Bivens* Implied Right of Action Does Not Apply To Claims Against**  
 4 **Private Corporations**

5 While the lack of state action is enough to reject Plaintiffs’ First Amendment claim, any  
 6 effort to invoke *Bivens* to bring this claim against Defendants here also fails for an independent  
 7 reason: *Bivens* has never been applied against a private corporation, and the Supreme Court has  
 8 made clear that it cannot be extended to cases like this.

9 In *Bivens*, the Supreme Court recognized “an implied private action for damages against  
 10 federal officers alleged to have violated a citizen’s constitutional rights.” *Corr. Servs. Corp. v.*  
 11 *Malesko*, 534 U.S. 61, 66 (2001). But, as the Court has repeatedly explained, “expanding the  
 12 *Bivens* remedy is now a ‘disfavored’ judicial activity.” *Ziglar v. Abbasi*, 137 S. Ct. 1843, 1856-  
 13 57 (2017); accord *Hernandez v. Mesa*, 140 S. Ct. 735, 743 (2020) (“for almost 40 years, we have  
 14 consistently rebuffed requests to add to the claims allowed under *Bivens*”); *Malesko*, 534 U.S. at  
 15 68 (explaining that since *Carlson v. Green*, 446 U. S. 14 (1980), “we have consistently refused to  
 16 extend *Bivens* liability to any new context or new category of defendants”). In keeping with that  
 17 principle, the Supreme Court has limited *Bivens* to specific contexts, which are concerned “solely  
 18 with deterring the unconstitutional acts of individual officers,” *Malesko*, 534 U.S. at 71  
 19 (emphases added). “Where such circumstances are not present, we have consistently rejected  
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21 <sup>8</sup> Plaintiffs also make a passing reference to the “interdependence between Chairman Schiff  
 22 and the Defendants.” ¶ 91. Insofar as Plaintiffs meant to invoke the alternative “joint action” test  
 23 for state action, they make no effort to support such a theory with any factual allegations. That is  
 24 not surprising: Plaintiffs have no basis to suggest that Defendants entered into some kind of joint  
 25 venture with the government to censor their content. *Accord Franklin v. Fox*, 312 F.3d 423, 445  
 26 (9th Cir. 2002) (describing “substantial degree of cooperation” required for “joint action”). Nor,  
 27 again, have plaintiffs alleged governmental involvement in the specific decisions challenged  
 28 here. *See Mathis*, 75 F.3d at 503-04 (despite “close cooperation” with government Task Force,  
 no joint action where Task Force did not participate in individual disciplinary action underlying  
 dispute); *see also Daniels*, 2021 WL 1222166, at \*8. Plaintiffs cannot overcome their inability to  
 allege state action by claiming that “further information that may be relevant ... can only be  
 revealed through discovery.” ¶ 93. Plaintiffs cannot turn their pleading deficiencies into cause for  
 discovery. *See Iqbal*, 556 U.S. at 678 (a plaintiff “armed with nothing more than conclusions”  
 cannot “unlock the doors of discovery”); *Mireskandari v. Daily Mail & General Trust PLC*,  
 2013 WL 12129944, at \*3 (C.D. Cal. Jan. 14, 2013) (explaining that discovery is “intrusive,  
 expensive, and expression-chilling”).

1 invitations to extend *Bivens*, often for reasons that foreclose its extension here.” *Malesko*, 534  
 2 U.S. at 70. The Court has expressly refused to apply *Bivens* to claims even against government  
 3 agencies (as opposed to individual officers), *FDIC v. Meyer*, 510 U. S. 471, 484-486 (1994), or  
 4 against private corporations undisputedly acting under color of federal law, *Malesko*, 534 U.S. at  
 5 70-75.

6 These principles categorically foreclose any application of *Bivens* in this case. Plaintiffs  
 7 seek to assert constitutional tort claims against wholly private companies. That flies in the face of  
 8 *Malesko*, which rejected *Bivens* liability against a private corporation operating a prison under a  
 9 government contract. As the Court explained, allowing such claims against corporate entities  
 10 would be inconsistent with “[t]he purpose of *Bivens*”: “to deter *individual federal officers* from  
 11 committing constitutional violations.” *Malesko*, 534 U.S. at 70-71 (emphasis added). Given that  
 12 limited purpose, “inferring a constitutional tort remedy against a private entity like CSC is  
 13 therefore foreclosed.” *Id.* at 71. It is not surprising, therefore, that the Supreme Court has *never*  
 14 allowed a *Bivens* claim to be asserted against a corporation and, since *Malesko*, no other federal  
 15 court has done so either. *See Martinez v. GEO Grp., Inc.*, 2020 WL 2496063, at \*17-18 (C.D.  
 16 Cal. Jan. 7, 2020) (“[C]ourts have never implied a *Bivens* remedy where the defendant is an  
 17 entity instead of an individual.”). In short, as in *Malesko*, the “caution toward extending *Bivens*  
 18 remedies into any new context, a caution consistently and repeatedly recognized for three  
 19 decades, forecloses such an extension here.” 534 U.S. at 74.

20 That is especially true here because, as discussed *infra* pp. 18-19, expanding *Bivens* to  
 21 this situation would intrude on Defendants’ own protected right to exercise editorial control over  
 22 the content on their platforms. As the Supreme Court has explained, “a *Bivens* remedy will not  
 23 be available if there are special factors counselling hesitation.” *Ziglar*, 137 S.Ct. at 1857  
 24 (quotation marks omitted). Those special factors include “context[s] in which Congress has  
 25 designed its regulatory authority in a guarded way” and those where “some other feature of a  
 26 case ... causes a court to pause before acting without express congressional authorization.” *Id.* at  
 27 1858. Here, the First Amendment—which protects against claims that would impose liability  
 28 based on Defendants’ decisions to remove content from their private platforms, *see infra* pp.18-

19—“make it less probable that Congress would want the Judiciary to entertain a damages suit” or expand an implied right of action in this case. *Id.*

## 3 **II. THE FIRST AMENDMENT INDEPENDENTLY BARS PLAINTIFFS’ *BIVENS*** 4 **CLAIM**

5 Plaintiffs have the relevant First Amendment interests exactly backwards. Far from  
6 violating the First Amendment, YouTube’s and Facebook’s editorial decisions about the content  
7 they permit on their platforms are themselves protected by the First Amendment. Indeed, even  
8 Plaintiffs begrudgingly admit that “YouTube and Facebook arguably have some rights to  
9 moderate content on their platforms.” ¶ 77.

10 In light of the ongoing pandemic, Defendants have exercised those rights to curtail the  
11 spread of potentially dangerous misinformation about COVID-19 treatment, vaccination, or  
12 transmission. *See* ¶ 61. YouTube’s policy, for example, prohibits “content about COVID-19 that  
13 poses a serious risk of egregious harm,” including content that “spreads medical misinformation  
14 that contradicts local health authorities’ or the World Health Organization’s (WHO) medical  
15 information about COVID-19.” White Ex. 10 at 1. Facebook similarly has committed to  
16 removing “content with false claims or conspiracy theories that have been flagged by leading  
17 global health organizations and local health authorities that could cause harm to people who  
18 believe them.” White Ex. 16 at 51.<sup>9</sup>

19 These policies reflect Defendants’ editorial judgment that information that contradicts the  
20 advice of public health authorities regarding COVID-19 is harmful, and that removing such  
21 information may help keep their user communities safe. *See* White Exs. 10, 16 at 1. Because  
22 “one important manifestation of the principle of free speech is that one who chooses to speak  
23 may also decide ‘what not to say,’” Defendants’ determinations that such content is not welcome  
24 on their platforms is plainly entitled to First Amendment protection. *Hurley v. Irish-Am. Gay,*  
25 *Lesbian & Bisexual Grp. of Bos.*, 515 U.S. 557, 573 (1995); *see also id.* at 570 (“[T]he  
26 presentation of an edited compilation of speech generated by other persons ... fall[s] squarely  
27 within the core of First Amendment security.”); *La Tiejira v. Facebook, Inc.*, 272 F. Supp. 3d  
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<sup>9</sup> This document is expressly referenced in Plaintiffs’ FAC. ¶ 61.

1 981, 991 (S.D. Tex. 2017) (“Facebook [has a] First Amendment right to decide what to publish  
2 and what not to publish on its platform.”).

3 Yet through this lawsuit, Plaintiffs ask this Court to deprive Defendants of the choice  
4 “not to propound a particular point of view.” *Hurley*, 515 U.S. at 573, 575. The First Amendment  
5 does not allow this result. *Id.*; see also *New York Times Co. v. Sullivan*, 376 U.S. 254, 277  
6 (1964); *Miami Herald Pub. Co. v. Tornillo*, 418 U.S. 241, 257-258 (1974) (striking down law  
7 requiring newspapers to publish certain third-party speech); *Zhang v. Baidu.com Inc.*, 10 F.  
8 Supp. 3d 433, 443 (S.D.N.Y. 2014) (search engine’s judgment about what content to exclude  
9 from its search results protected by First Amendment); *Langdon v. Google, Inc.*, 474 F. Supp. 2d  
10 622, 629-630 (D. Del. 2007) (same); *Search King Inc. v. Google Tech., Inc.*, 2003 WL  
11 21464568, at \*3 (W.D. Okla. May 27, 2003) (same). Indeed, the magnitude of the burden  
12 Plaintiffs would impose on Defendants’ First Amendment rights is made clear by the relief they  
13 seek: “[a]n order directing [Defendants] to restore” Plaintiffs’ social media accounts and posts  
14 and “enjoining Defendants” from exercising editorial control in the future. FAC, Prayer for  
15 Relief at 1-3. That is compelled speech, and it is flatly foreclosed by the First Amendment. Just  
16 as “the courts ... should [not] dictate the contents of a newspaper,” *Assocs. & Aldrich Co. v.*  
17 *Times Mirror Co.*, 440 F.2d 133, 135 (9th Cir. 1971), Plaintiffs may not use the courts to force  
18 Defendants to publish their videos and other content. Doing so would impermissibly  
19 “[m]andat[e] speech that [Defendants] would not otherwise make.” *Riley v. Nat’l Fed’n of the*  
20 *Blind of N.C., Inc.*, 487 U.S. 781, 795 (1988).

### 21 CONCLUSION

22 The FAC should be dismissed. Because it is now abundantly clear that Plaintiff’s claim  
23 cannot be cured by amendment, dismissal should be with prejudice.

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Respectfully submitted,

Dated: April 12, 2021

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**SIGNATURE ATTESTATION**

I, Lauren Gallo White, hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing of this e-filed document. I further attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/S/) within this e-filed document.

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*Attorneys for Defendant*  
 YOUTUBE, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

THE INFORMED CONSENT ACTION  
 NETWORK and DEL BIGTREE,

Plaintiffs,

v.

YOUTUBE LLC and FACEBOOK, INC.,

Defendants.

CASE NO.: 4:20-cv-09456-JST

**DECLARATION OF LAUREN  
 GALLO WHITE IN SUPPORT OF  
 DEFENDANTS' MOTION TO  
 DISMISS FIRST AMENDED  
 COMPLAINT**

Hon. Jon S. Tigar  
 Courtroom 6 – 2nd floor  
 Date: May 27, 2021  
 Time: 2:00 p.m.

1 I, Lauren Gallo White, declare and state as follows:

2 1. I am a member of the law firm Wilson Sonsini Goodrich & Rosati, P.C., counsel  
3 for YouTube LLC (“YouTube”) in the above-captioned action. I have personal knowledge of the  
4 facts set forth herein and, if called as a witness, I could and would testify competently thereto.

5 2. Attached hereto as Exhibit 1 is a true and correct copy of a letter sent by Sonal N.  
6 Mehta and Lauren Gallo White to Aaron Siri, Elizabeth A. Brehm, and Sam Muriella on  
7 February 26, 2021.

8 3. Attached hereto as Exhibit 2 is a true and correct copy of a letter sent by Aaron  
9 Siri and Elizabeth A. Brehm to Sonal N. Mehta and Lauren Gallo White on March 11, 2021.

10 4. Attached hereto as Exhibit 3 is a true and correct copy of a letter sent by Sonal N.  
11 Mehta and Lauren Gallo White to Aaron Siri, Elizabeth A. Brehm, and Sam Muriella on April 5,  
12 2021.

13 5. Attached hereto as Exhibit 4 is a true and correct copy of YouTube’s Terms of  
14 Service, available at <https://www.youtube.com/static?template=terms>.

15 6. Attached hereto as Exhibit 5 is a true and correct copy of YouTube’s Community  
16 Guidelines, available at [https://www.youtube.com/howyoutubeworks/policies/community-](https://www.youtube.com/howyoutubeworks/policies/community-guidelines/)  
17 [guidelines/](https://www.youtube.com/howyoutubeworks/policies/community-guidelines/).

18 7. Attached hereto as Exhibit 6 is a true and correct copy of Facebook’s Plain Text  
19 Terms of Service, available at [https://www.facebook.com/legal/terms/plain\\_text\\_terms](https://www.facebook.com/legal/terms/plain_text_terms).

20 8. Attached hereto as Exhibit 7 is a true and correct copy of Facebook’s Community  
21 Standards, available at <https://www.facebook.com/communitystandards/>.

22 9. Attached hereto as Exhibit 8 is a true and correct copy of YouTube’s Child Safety  
23 Policy, available at <https://support.google.com/youtube/answer/2801999?hl=en>.

24 10. Attached hereto as Exhibit 9 is a true and correct copy of YouTube’s Harmful or  
25 Dangerous Content Policies, available at  
26 [https://support.google.com/youtube/answer/2801964?hl=en&ref\\_topic=9282436](https://support.google.com/youtube/answer/2801964?hl=en&ref_topic=9282436).

11. Attached hereto as Exhibit 10 is a true and correct copy of YouTube’s COVID-19 Medical Misinformation Policy, available at [https://support.google.com/youtube/answer/9891785?hl=en&ref\\_topic=9282436](https://support.google.com/youtube/answer/9891785?hl=en&ref_topic=9282436).

12. Attached hereto as Exhibit 11 is a true and correct copy of Facebook’s Community Standards on Suicide and Self-Injury, available at [https://www.facebook.com/communitystandards/suicide\\_self\\_injury\\_violence](https://www.facebook.com/communitystandards/suicide_self_injury_violence).

13. Attached hereto as Exhibit 12 is a true and correct copy of Facebook’s Community Standards on Coordinating Harm and Publicizing Crime, available at [https://www.facebook.com/communitystandards/coordinating\\_harm\\_publicizing\\_crime](https://www.facebook.com/communitystandards/coordinating_harm_publicizing_crime).

14. Attached hereto as Exhibit 13 is a true and correct copy of the transcript of Plaintiff ICAN’s video alleged in the Complaint to be titled “WE NEED TO CATCH THAT COLD!”, previously available at <https://www.youtube.com/watch/E32JXWWex6s> and removed from YouTube on July 28, 2020. *See* Compl. ¶ 56, Ex. B at 12-13.

15. Attached hereto as Exhibit 14 is a true and correct copy of the transcript of Plaintiff ICAN’s video alleged in the Complaint to be titled “MASK TEST PROVES TOXIC FOR CHILDREN”, previously available at <https://www.youtube.com/watch/229cvY7UHbE> and removed from YouTube on July 7, 2020. *See* Compl. ¶ 56, Ex. B at 4-5.

16. Attached hereto as Exhibit 15 is a true and correct copy of the transcript of Plaintiff ICAN’s video alleged in the Complaint to be titled “ICAN VS CDC”, previously available at [https://www.youtube.com/watch/gJUjnY\\_FGNQt](https://www.youtube.com/watch/gJUjnY_FGNQt) and removed from YouTube on July 29, 2020. *See* Compl. ¶ 56, Ex. B at 15-16.

17. Attached hereto as Exhibit 16 is a true and correct copy of Facebook’s update entitled Keeping People Safe and Informed About the Coronavirus, available at <https://about.fb.com/news/2020/12/coronavirus/>.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on April 12, 2021 at San Francisco, California.

/s/ Lauren Gallo White  
Lauren Gallo White

# Exhibit 1

WILMERHALE

February 26, 2021

Sonal N. Mehta

By E-mail

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+1 650 858 6100 (f)  
sonal.mehta@wilmerhale.com

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Phoenix, AZ 85028

Sam Muriella  
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Irvine, CA 92618

**Re: *The Informed Consent Action Network, et al. v. YouTube LLC, et al.*, No. 4:20-cv-9456-SVK (N.D. Cal.)**

Dear Mr. Siri, Ms. Brehm, and Mr. Muriella:

We write on behalf of Facebook, Inc. and YouTube, LLC regarding the above-captioned matter. We have reviewed your complaint asserting that the termination of ICAN's and Del Bigtree's Facebook page and YouTube channel violated your clients' First Amendment rights and breached the covenant of good faith and fair dealing. Our review of your Complaint raises serious questions about the validity of your claims, including whether they impermissibly target Facebook's and YouTube's *own* First Amendment-protected activity. Put simply, it appears there is not a good faith basis to proceed with this suit.

*First*, your complaint identifies no reasonable basis to conclude that either Facebook or YouTube—each a private corporation—is a state actor capable of violating other private entities' First Amendment rights. It is bedrock constitutional law that the First Amendment is a shield from government action, not a sword to be used against private entities. Accordingly, *Bivens* provides a remedy only against “individual *federal* officers.” *Correctional Servs. Corp. v. Malesko*, 534 U.S. 61, 70 (2001) (emphasis added). It can apply to private actors, such as Facebook or YouTube, only when their conduct is so intertwined with that of federal actors that “it is fair to attribute the challenged actions” to the federal government. *Morse v. North Coast Opportunities, Inc.*, 118 F.3d 1338, 1343 (9th Cir. 1997). At most, the complaint establishes that federal officials or agencies have demonstrated an interest in healthcare-related misinformation.

WILMERHALE

February 26, 2021

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But mere “regulatory interest in a problem” does not convert private action into state action. *Mathis v. Pacific Gas & Elec. Co.*, 75 F.3d 498, 503 (9th Cir. 1995).

*Second*, the good-faith-and-fair-dealing claim is barred by the First Amendment because it is based on Facebook’s and YouTube’s decisions to moderate or restrict access to ICAN’s and Del Bigtree’s content. Those decisions are First-Amendment protected activity; “Facebook [has a] First Amendment right to decide what to publish and what not to publish on its platform.” *La Tijera v. Facebook, Inc.*, 272 F. Supp. 3d 981, 991 (S.D. Tex. 2017); *see also Miami Herald v. Tornillo*, 418 U.S. 241, 257-258 (1974) (the First Amendment protects a newspaper’s right to “exercise editorial control and judgment” including “the choice of material to go into the newspaper”). Facebook’s and YouTube’s moderation decisions cannot be the source of civil liability. *See New York Times v. Sullivan*, 376 U.S. 254, 277 (1964).

*Third*, Section 230 of the Communications Decency Act shields Facebook and YouTube from liability for the good-faith-and-fair dealing claim, which arises out of alleged access restrictions applied to ICAN’s and Bigtree’s content. Section 230(c)(1) preempts claims that target decisions by interactive computer services, such as Facebook and YouTube, to show or restrict access to content created by another entity. *See Barnes v. Yahoo!, Inc.*, 570 F.3d 1096, 1102 (9th Cir. 2009). Applied here, Section 230 precludes liability against Facebook or YouTube for any claim that they allegedly limited access to Plaintiffs’ content or terminated Plaintiffs’ Facebook page or YouTube channel. *See Federal Agency of News LLC v. Facebook, Inc.*, 432 F. Supp. 3d 1107, 1118 (N.D. Cal. 2020) (holding that Section 230 immunized Facebook from, among other things, claims for alleged breach of the implied covenant of good faith and fair dealing because “Plaintiffs’ claims [were] based on Facebook’s decision not to publish [Plaintiffs’] content” by terminating Plaintiff’s account).

*Fourth*, the claim for breach of the implied covenant of good faith and fair dealing fails on its own terms because the complaint does not identify any provision of Facebook’s or YouTube’s Terms of Service entitling ICAN or Bigtree (or any user) to continued use of those platforms after Facebook or YouTube determined that they violated the Terms of Service. The complaint thus does not identify any “express terms” of the contract “on which to hinge an implied duty.” *Young v. Facebook, Inc.*, No. 5:10-cv-03579, 2010 WL 4269304, at \*3-4 (N.D. Cal. Oct. 25, 2010).

In short, the complaint does not state any viable legal claims against Facebook or YouTube, and its numerous deficiencies cannot be cured by amendment. To the extent you believe that we misapprehend the law or your factual allegations, please explain the specific basis for your disagreement. To the extent you believe there are amendments that could somehow cure these defects, please plead them *before* Facebook and YouTube (and, importantly, the Court) are forced to undertake the burden and expense of litigating a motion to dismiss. To

WILMERHALE

February 26, 2021

Page 3

the extent you intend to proceed with your complaint as filed, please be on notice that Facebook and YouTube will vigorously defend themselves against baseless claims.

Sincerely,

/s/ Sonal N. Mehta

Sonal N. Mehta  
*Counsel for Facebook, Inc.*

/s/ Lauren Gallo White

Lauren Gallo White  
*Counsel for YouTube, LLC*

cc: Ari Holtzblatt  
Molly Jennings  
Brian Willen

# Exhibit 2

# Siri | Glimstad

---

200 Park Avenue, Seventeenth Floor, New York, NY 10166  
sirillp.com | P: (212) 532-1091 | F: (646) 417-5967

March 11, 2021

**VIA EMAIL**

Ms. Sonal N. Mehta, Esq.  
WilmerHale  
2600 El Camino Real, Suite 400  
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Ms. Lauren Gallo White, Esq.  
Wilson Sonsini Goodrich & Rosati  
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Re: *Informed Consent Action Network, et al. v. YouTube LLC, et al.*, No. 4:20-cv-9456-SVK (N.D. Cal.)

Dear Ms. Mehta and Ms. Gallo White:

We are in receipt of your letter dated February 26, 2021 and have had the chance to review it. We do not agree with your contentions nor your legal conclusions. The complaint itself provides more than an adequate and good faith basis to proceed.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'ASiri', is positioned above the typed names of the signatories.

Aaron Siri, Esq.  
Elizabeth A. Brehm, Esq.

# Exhibit 3

WILMERHALE

April 5, 2021

Sonal N. Mehta

**By E-mail**

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Irvine, CA 92618

**Re: *The Informed Consent Action Network, et al. v. YouTube LLC, et al.*, No. 4:20-cv-9456-SVK (N.D. Cal.)**

Dear Mr. Siri, Ms. Brehm, and Mr. Muriella:

We write on behalf of Facebook, Inc. and YouTube, LLC regarding the above-captioned matter.

As you are aware, on February 26, 2021, we wrote to inform you that our review of your Complaint raised serious questions about the validity of your claims, including your claim for a breach of the covenant of good faith and fair dealing. Based on these infirmities, which we detailed at length, we concluded that there appeared to be no good faith basis to proceed with this suit. We suggested that, if you disagreed or had additional facts or allegations to support your claims, that you amend before putting Defendants to the expense of briefing the motions to dismiss. You chose to stand on your Complaint: “The complaint itself provides more than an adequate and good faith basis to proceed.” *See* March 11, 2021 Letter from E. Brehm.

We were therefore surprised to see that, after we were forced to expend substantial resources filing a motion to dismiss, and after Facebook filed a special motion to strike your good-faith-and-fair-dealing claim, you chose to file an Amended Complaint that, among other things, abandoned that claim.

We have now explained the deficiencies in your remaining claims twice—in our February 26 letter and in our motion to dismiss. At this point, it is incumbent on you to have

WILMERHALE

April 5, 2021

Page 2

pleaded the facts and allegations that you believe support your claims—before we expend additional resources litigating any further motions to dismiss. If there are any additional allegations or amendments that you believe would cure the defects in your case, please let us know immediately so that the parties can discuss them before Defendants spend more time and money preparing our next motion to dismiss. If we do not hear from you, we will understand that ICAN has pleaded its best case, and that we, and more importantly the Court, can now evaluate that complaint to conclusively determine whether it can plausibly state a claim under applicable legal standards.

You are on notice that, given the history of this action, it would be difficult to see any future amendment as anything other than, at best, the result of undue delay, and at worst, a bad faith effort to lie in wait until Defendants expended yet more resources litigating the latest motion to dismiss. Facebook and YouTube will vigorously defend themselves against baseless claims and will seek all appropriate relief to which they may be entitled.

Finally, as to Facebook's anti-SLAPP motion, Facebook intends to file a motion for attorneys' fees. Please let us know if you would like to confer to see if the parties can reach a stipulation as to the amount of fees. If not, we would like to propose the following briefing schedule on Facebook's anticipated motion for attorneys' fees:

Facebook's motion for attorneys' fees: 14 days after Court's ruling motion to dismiss

ICAN's response: 21 days after motion is filed

Facebook's reply: 14 days after opposition is filed

We request a response to this letter by Wednesday, April 7, 2021. We look forward to hearing back from you.

Sincerely,

/s/ Sonal N. Mehta

Sonal N. Mehta  
*Counsel for Facebook, Inc.*

/s/ Lauren Gallo White

Lauren Gallo White

WILMERHALE

April 5, 2021  
Page 3

*Counsel for YouTube, LLC*

cc: Ari Holtzblatt  
Molly Jennings  
Brian Willen

# Exhibit 4



# Terms of Service

## Terms of Service

[Paid Service Terms of Service](#)

[Paid Service Usage Rules](#)

[Collecting Society Notices](#)

[Copyright Notices](#)

[Community Guidelines](#)

## What's in these terms?

This index is designed to help you understand some of the key updates we've made to our Terms of Service (Terms). We hope this serves as a useful guide, but please ensure you read the Terms in full.

### Welcome to YouTube!

This section outlines our relationship with you. It includes a description of the Service, defines our Agreement, and names your service provider.

### Who May Use the Service?

This section sets out certain requirements for use of the Service, and defines categories of users.

### Your Use of the Service

This section explains your rights to use the Service, and the conditions that apply to your use of the Service. It also explains how we may make changes to the Service.

### Your Content and Conduct

This section applies to users who provide Content to the Service. It defines the scope of the permissions that you grant by uploading your Content, and includes your agreement not to upload anything that infringes on anyone else's rights.

### Account Suspension and Termination

This section explains how you and YouTube may terminate this relationship.

**About Software in the Service**

This section includes details about software on the Service.

**Other Legal Terms**

This section includes our service commitment to you. It also explains that there are some things we will not be responsible for.

**About this Agreement**

This section includes some further important details about our contract, including what to expect if we need to make changes to these Terms; or which law applies to them.

## Terms of Service

Dated: November 18, 2020

## Welcome to YouTube!

**Introduction**

Thank you for using the YouTube platform and the products, services and features we make available to you as part of the platform (collectively, the “Service”).

**Our Service**

The Service allows you to discover, watch and share videos and other content, provides a forum for people to connect, inform, and inspire others across the globe, and acts as a distribution platform for original content creators and advertisers large and small. We provide lots of information about our products and how to use them in our [Help Center](#). Among other things, you can find out about [YouTube Kids](#), the [YouTube Partner Program](#) and [YouTube Paid Memberships](#)

[and Purchases](#) (where available). You can also read all about enjoying content on [other devices like your television, your games console, or Google Home](#).

## Your Service Provider

The entity providing the Service is Google LLC, a company operating under the laws of Delaware, located at 1600 Amphitheatre Parkway, Mountain View, CA 94043 (referred to as “YouTube”, “we”, “us”, or “our”). References to YouTube’s “Affiliates” in these terms means the other companies within the Alphabet Inc. corporate group (now or in the future).

## Applicable Terms

Your use of the Service is subject to these terms, the [YouTube Community Guidelines](#) and the [Policy, Safety and Copyright Policies](#) which may be updated from time to time (together, this “Agreement”). Your Agreement with us will also include the [Advertising on YouTube Policies](#) if you provide advertising or sponsorships to the Service or incorporate paid promotions in your content. Any other links or references provided in these terms are for informational use only and are not part of the Agreement.

Please read this Agreement carefully and make sure you understand it. If you do not understand the Agreement, or do not accept any part of it, then you may not use the Service.

## Who may use the Service?

### Age Requirements

You must be at least 13 years old to use the Service. However, children of all ages may use YouTube Kids (where available) if enabled by a parent or legal guardian.

### Permission by Parent or Guardian

If you are under 18, you represent that you have your parent or guardian’s permission to use the Service. Please have them read this Agreement with you.

If you are a parent or legal guardian of a user under the age of 18, by allowing your child to use the Service, you are subject to the terms of this Agreement and responsible for your child's activity on the Service. You can find tools and resources to help you manage your family's experience on YouTube in our [Help Center](#) and through Google's [Family Link](#).

### **Businesses**

If you are using the Service on behalf of a company or organisation, you represent that you have authority to act on behalf of that entity, and that such entity accepts this Agreement.

## **Your Use of the Service**

### **Content on the Service**

The content on the Service includes videos, audio (for example music and other sounds), graphics, photos, text (such as comments and scripts), branding (including trade names, trademarks, service marks, or logos), interactive features, software, metrics, and other materials whether provided by you, YouTube or a third-party (collectively, "Content").

Content is the responsibility of the person or entity that provides it to the Service. YouTube is under no obligation to host or serve Content. If you see any Content you believe does not comply with this Agreement, including by violating the [Community Guidelines](#) or the law, you can [report it to us](#).

### **Google Accounts and YouTube Channels**

You can use parts of the Service, such as browsing and searching for Content, without having a [Google account](#). However, you do need a Google account to use some features. With a Google account, you may be able to like videos, subscribe to channels, create your own YouTube channel, and more. You can follow these instructions to [create a Google account](#).

Creating a YouTube channel will give you access to additional features and functions, such as uploading videos, making comments or creating playlists (where available). Here are some details about how to [create your own YouTube channel](#).

To protect your Google account, keep your password confidential. You should not reuse your Google account password on third-party applications. Learn more about [keeping your Google account secure](#), including what to do if you learn of any unauthorized use of your password or Google account.

### Your Information

Our [Privacy Policy](#) explains how we treat your personal data and protect your privacy when you use the Service. The [YouTube Kids Privacy Notice](#) provides additional information about our privacy practices that are specific to YouTube Kids.

We will process any audio or audiovisual content uploaded by you to the Service in accordance with the [YouTube Data Processing Terms](#), except in cases where you uploaded such content for personal purposes or household activities. [Learn More](#).

### Permissions and Restrictions

You may access and use the Service as made available to you, as long as you comply with this Agreement and applicable law. You may view or listen to Content for your personal, non-commercial use. You may also show YouTube videos through the embeddable YouTube player.

The following restrictions apply to your use of the Service. You are not allowed to:

1. access, reproduce, download, distribute, transmit, broadcast, display, sell, license, alter, modify or otherwise use any part of the Service or any Content except: (a) as expressly authorized by the Service; or (b) with prior written permission from YouTube and, if applicable, the respective rights holders;

2. circumvent, disable, fraudulently engage with, or otherwise interfere with any part of the Service (or attempt to do any of these things), including security-related features or features that (a) prevent or restrict the copying or other use of Content or (b) limit the use of the Service or Content;
3. access the Service using any automated means (such as robots, botnets or scrapers) except (a) in the case of public search engines, in accordance with YouTube's robots.txt file; or (b) with YouTube's prior written permission;
4. collect or harvest any information that might identify a person (for example, usernames or faces), unless permitted by that person or allowed under section (3) above;
5. use the Service to distribute unsolicited promotional or commercial content or other unwanted or mass solicitations;
6. cause or encourage any inaccurate measurements of genuine user engagement with the Service, including by paying people or providing them with incentives to increase a video's views, likes, or dislikes, or to increase a channel's subscribers, or otherwise manipulate metrics in any manner;
7. misuse any reporting, flagging, complaint, dispute, or appeals process, including by making groundless, vexatious, or frivolous submissions;
8. run contests on or through the Service that do not comply with [YouTube's contest policies and guidelines](#);
9. use the Service to view or listen to Content other than for personal, non-commercial use (for example, you may not publicly screen videos or stream music from the Service); or
10. use the Service to (a) sell any advertising, sponsorships, or promotions placed on, around, or within the Service or Content, other than those allowed in the [Advertising on](#)

YouTube policies (such as compliant product placements); or (b) sell advertising, sponsorships, or promotions on any page of any website or application that only contains Content from the Service or where Content from the Service is the primary basis for such sales (for example, selling ads on a webpage where YouTube videos are the main draw for users visiting the webpage).

## Reservation

Using the Service does not give you ownership of or rights to any aspect of the Service, including user names or any other Content posted by others or YouTube.

## Changes to the Service

YouTube is constantly changing and improving the Service. We may also need to alter or discontinue the Service, or any part of it, in order to make performance or security improvements, change functionality and features, make changes to comply with law, or prevent illegal activities on or abuse of our systems. These changes may affect all users, some users or even an individual user. Whenever reasonably possible, we will provide notice when we discontinue or make material changes to our Service that will have an adverse impact on the use of our Service. However, you understand and agree that there will be times when we make such changes without notice, such as where we feel we need to take action to improve the security and operability of our Service, prevent abuse, or comply with legal requirements.

## Your Content and Conduct

### Uploading Content

If you have a YouTube channel, you may be able to upload Content to the Service. You may use your Content to promote your business or artistic enterprise. If you choose to upload Content, you must not submit to the Service any Content that

does not comply with this Agreement (including the [YouTube Community Guidelines](#)) or the law. For example, the Content you submit must not include third-party intellectual property (such as copyrighted material) unless you have permission from that party or are otherwise legally entitled to do so. You are legally responsible for the Content you submit to the Service. We may use automated systems that analyze your Content to help detect infringement and abuse, such as spam, malware, and illegal content.

### **Rights you Grant**

You retain ownership rights in your Content. However, we do require you to grant certain rights to YouTube and other users of the Service, as described below.

### **License to YouTube**

By providing Content to the Service, you grant to YouTube a worldwide, non-exclusive, royalty-free, sublicensable and transferable license to use that Content (including to reproduce, distribute, prepare derivative works, display and perform it) in connection with the Service and YouTube's (and its successors' and Affiliates') business, including for the purpose of promoting and redistributing part or all of the Service.

### **License to Other Users**

You also grant each other user of the Service a worldwide, non-exclusive, royalty-free license to access your Content through the Service, and to use that Content, including to reproduce, distribute, prepare derivative works, display, and perform it, only as enabled by a feature of the Service (such as video playback or embeds). For clarity, this license does not grant any rights or permissions for a user to make use of your Content independent of the Service.

### **Duration of License**

The licenses granted by you continue for a commercially reasonable period of time after you remove or delete your Content from the Service. You understand and agree, however, that YouTube may retain, but not display, distribute, or perform, server copies of your videos that have been removed or deleted.

### **Right to Monetize**

You grant to YouTube the right to monetize your Content on the Service (and such monetization may include displaying ads on or within Content or charging users a fee for access). This Agreement does not entitle you to any payments. Starting November 18, 2020, any payments you may be entitled to receive from YouTube under any other agreement between you and YouTube (including for example payments under the YouTube Partner Program, Channel memberships or Super Chat) will be treated as royalties. If required by law, Google will withhold taxes from such payments.

### **Removing Your Content**

You may [remove your Content](#) from the Service at any time. You also have the option to [make a copy of your Content](#) before removing it. You must remove your Content if you no longer have the rights required by these terms.

### **Removal of Content By YouTube**

If we reasonably believe that any Content is in breach of this Agreement or may cause harm to YouTube, our users, or third parties, we may remove or take down that Content in our discretion. We will notify you with the reason for our action unless we reasonably believe that to do so: (a) would breach the law or the direction of a legal enforcement authority or would otherwise risk legal liability for YouTube or our Affiliates; (b) would compromise an investigation or the integrity or operation of the Service; or (c) would cause harm to any user, other third party, YouTube or our Affiliates. You can learn more about reporting and enforcement, including

how to appeal on the [Troubleshooting](#) page of our Help Center.

## Copyright Protection

We provide information to help copyright holders manage their intellectual property online in our [YouTube Copyright Center](#). If you believe your copyright has been infringed on the Service, please [send us a notice](#).

We respond to notices of alleged copyright infringement according to the process in our [YouTube Copyright Center](#), where you can also find information about how to resolve a copyright strike. YouTube's policies provide for the termination, in appropriate circumstances, of repeat infringers' access to the Service.

## Account Suspension & Termination

### Terminations by You

You may stop using the Service at any time. Follow these [instructions](#) to delete the Service from your Google Account, which involves closing your YouTube channel and removing your data. You also have the option to download a copy of your data first.

### Terminations and Suspensions by YouTube for Cause

YouTube may suspend or terminate your access, your Google account, or your Google account's access to all or part of the Service if (a) you materially or repeatedly breach this Agreement; (b) we are required to do so to comply with a legal requirement or a court order; or (c) we believe there has been conduct that creates (or could create) liability or harm to any user, other third party, YouTube or our Affiliates.

### Terminations by YouTube for Service Changes

YouTube may terminate your access, or your Google account's access to all or part of the Service if YouTube

believes, in its sole discretion, that provision of the Service to you is no longer commercially viable.

### **Notice for Termination or Suspension**

We will notify you with the reason for termination or suspension by YouTube unless we reasonably believe that to do so: (a) would violate the law or the direction of a legal enforcement authority, or would otherwise risk legal liability for YouTube or our Affiliates; (b) would compromise an investigation or the integrity or operation of the Service; or (c) would cause harm to any user, other third party, YouTube or our Affiliates. Where YouTube is terminating your access for Service changes, where reasonably possible, you will be provided with sufficient time to export your Content from the Service.

### **Effect of Account Suspension or Termination**

If your Google account is terminated or your Google account's access to the Service is restricted, you may continue using certain aspects of the Service (such as viewing only) without an account, and this Agreement will continue to apply to such use. If you believe your Google account has been terminated in error, you can [appeal using this form](#).

## **About Software in the Service**

### **Downloadable Software**

When the Service requires or includes downloadable software (such as the YouTube Studio application), you give permission for that software to update automatically on your device once a new version or feature is available, subject to your device settings. Unless that software is governed by additional terms which provide a license, YouTube gives you a personal, worldwide, royalty-free, non-assignable and non-exclusive license to use the software provided to you by YouTube as part of the Service. This license is for the sole purpose of enabling you to use and enjoy the benefit of the Service as provided by YouTube, in the manner permitted by this

Agreement. You are not allowed to copy, modify, distribute, sell, or lease any part of the software, or to reverse-engineer or attempt to extract the source code of that software, unless laws prohibit these restrictions or you have YouTube's written permission.

### **Open Source**

Some software used in our Service may be offered under an open source license that we make available to you. There may be provisions in an open source license that expressly override some of these terms, so please be sure to read those licenses.

## **Other Legal Terms**

### **Warranty Disclaimer**

OTHER THAN AS EXPRESSLY STATED IN THIS AGREEMENT OR AS REQUIRED BY LAW, THE SERVICE IS PROVIDED "AS IS" AND YOUTUBE DOES NOT MAKE ANY SPECIFIC COMMITMENTS OR WARRANTIES ABOUT THE SERVICE. FOR EXAMPLE, WE DON'T MAKE ANY WARRANTIES ABOUT: (A) THE CONTENT PROVIDED THROUGH THE SERVICE; (B) THE SPECIFIC FEATURES OF THE SERVICE, OR ITS ACCURACY, RELIABILITY, AVAILABILITY, OR ABILITY TO MEET YOUR NEEDS; OR (C) THAT ANY CONTENT YOU SUBMIT WILL BE ACCESSIBLE ON THE SERVICE.

### **Limitation of Liability**

EXCEPT AS REQUIRED BY APPLICABLE LAW, YOUTUBE, ITS AFFILIATES, OFFICERS, DIRECTORS, EMPLOYEES AND AGENTS WILL NOT BE RESPONSIBLE FOR ANY LOSS OF PROFITS, REVENUES, BUSINESS OPPORTUNITIES, GOODWILL, OR ANTICIPATED SAVINGS; LOSS OR CORRUPTION OF DATA; INDIRECT OR CONSEQUENTIAL LOSS; PUNITIVE DAMAGES CAUSED BY:

1. ERRORS, MISTAKES, OR INACCURACIES ON THE SERVICE;

2. PERSONAL INJURY OR PROPERTY DAMAGE RESULTING FROM YOUR USE OF THE SERVICE;
3. ANY UNAUTHORIZED ACCESS TO OR USE OF THE SERVICE;
4. ANY INTERRUPTION OR CESSATION OF THE SERVICE;
5. ANY VIRUSES OR MALICIOUS CODE TRANSMITTED TO OR THROUGH THE SERVICE BY ANY THIRD PARTY;
6. ANY CONTENT WHETHER SUBMITTED BY A USER OR YOUTUBE, INCLUDING YOUR USE OF CONTENT; AND/OR
7. THE REMOVAL OR UNAVAILABILITY OF ANY CONTENT.

THIS PROVISION APPLIES TO ANY CLAIM, REGARDLESS OF WHETHER THE CLAIM ASSERTED IS BASED ON WARRANTY, CONTRACT, TORT, OR ANY OTHER LEGAL THEORY.

YOUTUBE AND ITS AFFILIATES' TOTAL LIABILITY FOR ANY CLAIMS ARISING FROM OR RELATING TO THE SERVICE IS LIMITED TO THE GREATER OF: (A) THE AMOUNT OF REVENUE THAT YOUTUBE HAS PAID TO YOU FROM YOUR USE OF THE SERVICE IN THE 12 MONTHS BEFORE THE DATE OF YOUR NOTICE, IN WRITING TO YOUTUBE, OF THE CLAIM; AND (B) USD \$500.

### **Indemnity**

To the extent permitted by applicable law, you agree to defend, indemnify and hold harmless YouTube, its Affiliates, officers, directors, employees and agents, from and against any and all claims, damages, obligations, losses, liabilities, costs or debt, and expenses (including but not limited to attorney's fees) arising from: (i) your use of and access to the Service; (ii) your violation of any term of this Agreement; (iii) your violation of any third party right, including without limitation any copyright, property, or privacy right; or (iv) any claim that your Content caused damage to a third party. This defense and indemnification obligation will survive this Agreement and your use of the Service.

### **Third-Party Links**

The Service may contain links to third-party websites and online services that are not owned or controlled by YouTube. YouTube has no control over, and assumes no responsibility for, such websites and online services. Be aware when you leave the Service; we suggest you read the terms and privacy policy of each third-party website and online service that you visit.

## **About this Agreement**

### **Modifying this Agreement**

We may modify this Agreement, for example, to reflect changes to our Service or for legal, regulatory, or security reasons. YouTube will provide reasonable advance notice of any material modifications to this Agreement and the opportunity to review them, except that modifications addressing newly available features of the Service or modifications made for legal reasons may be effective immediately without notice. Modifications to this Agreement will only apply going forward. If you do not agree to the modified terms, you should remove any Content you have uploaded and discontinue your use of the Service.

### **Continuation of this Agreement**

If your use of the Service ends, the following terms of this Agreement will continue to apply to you: "Other Legal Terms", "About This Agreement", and the licenses granted by you will continue as described under "Duration of License".

### **Severance**

If it turns out that a particular term of this Agreement is not enforceable for any reason, this will not affect any other terms.

### **No Waiver**

If you fail to comply with this Agreement and we do not take immediate action, this does not mean that we are giving up any rights that we may have (such as the right to take action in the future).

## Interpretation

In these terms, “include” or “including” means “including but not limited to,” and any examples we give are for illustrative purposes.

## Governing Law

All claims arising out of or relating to these terms or the Service will be governed by California law, except California’s conflict of laws rules, and will be litigated exclusively in the federal or state courts of Santa Clara County, California, USA. You and YouTube consent to personal jurisdiction in those courts.

## Limitation on Legal Action

YOU AND YOUTUBE AGREE THAT ANY CAUSE OF ACTION ARISING OUT OF OR RELATED TO THE SERVICES MUST COMMENCE WITHIN ONE (1) YEAR AFTER THE CAUSE OF ACTION ACCRUES. OTHERWISE, SUCH CAUSE OF ACTION IS PERMANENTLY BARRED.

Effective as of November 18, 2020 ([view previous version](#))

# Exhibit 5

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## **RULES AND POLICIES**

# Community Guidelines



### **Community Guidelines**

[Developing policies](#)[Detecting violations](#)[Flagging content](#)[Enforcing policies](#)

## Overview

Our Community Guidelines are designed to ensure our community stays protected. They set out what's allowed and not allowed on YouTube, and apply to all types of content on our platform, including videos, comments, links, and thumbnails.


You'll find a full list of our Community Guidelines below:

## Spam & deceptive practices


[Fake Engagement](#) 

[Impersonation](#) 

[Links in content](#) 


[Spam, deceptive practices & scams](#) 

## Sensitive content


[Child safety](#) 

[Custom thumbnails](#) 

[Nudity and sexual content](#) 


[Suicide and self injury](#) 

## Violent or dangerous content

[Harassment and cyberbullying](#) 

[Harmful or dangerous content](#) 

[Hate speech](#) 

[Violent criminal organizations](#) 

[Violent or graphic content](#) 

[COVID-19 misinfo policy](#) 

## Regulated goods

[Content featuring firearms](#) 

[Sale of Illegal or Regulated goods](#) 

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## **RULES AND POLICIES**

# Community Guidelines

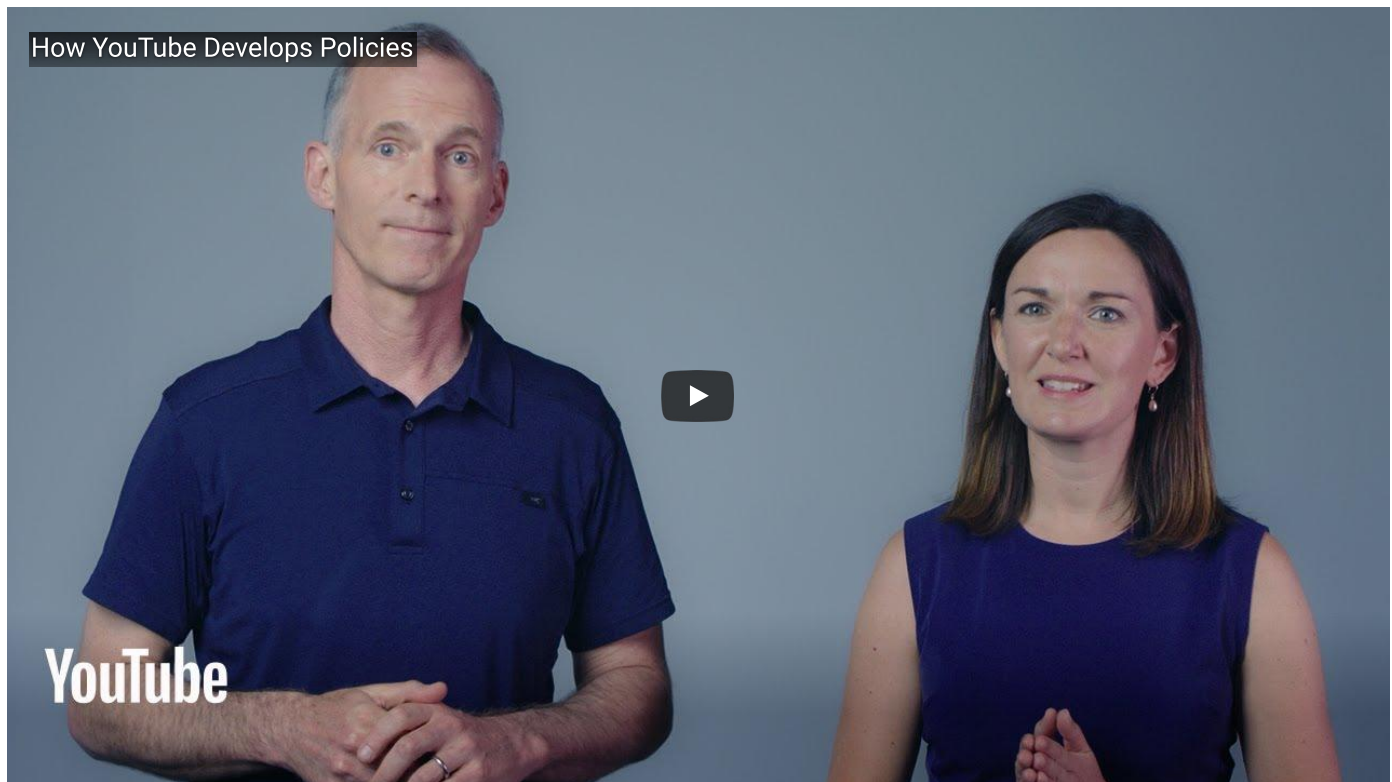


Community Guidelines **Developing policies** Detecting violations Flagging content Enforcing policies

## How do we develop new policies and update existing ones?

Each of our policies is carefully thought through so they are consistent, well-informed, and can be applied to content from around the world. They're developed in partnership with a wide range of external industry and policy experts, as well as YouTube Creators. New policies go through multiple rounds of testing before they go live to ensure our global team of content reviewers can apply them accurately and consistently.

This work is never finished, and we are always evaluating our policies to understand how we can better strike a balance between keeping the YouTube community protected and giving everyone a voice.



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## RULES AND POLICIES

# Community Guidelines



Community Guidelines   Developing policies   **Detecting violations**   Flagging content   Enforcing policies

## How does YouTube identify content that violates Community Guidelines?

With hundreds of hours of new content uploaded to YouTube every minute, we use a combination of people and machine learning to detect problematic content at scale. Machine learning is well-suited to detect patterns, which helps us to find content similar to other content we've already removed, even before it's viewed.

We also recognize that the best way to quickly remove content is to anticipate problems before they emerge. Our Intelligence Desk monitors the news, social media, and user reports to detect new trends surrounding inappropriate content, and works to make sure our

teams are prepared to address them before they can become a larger issue.

## Related articles

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**RULES AND POLICIES**

## Community Guidelines



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### Is there a way for the broader community to flag harmful content?

Though we are determined to continue reducing exposure to videos that violate our policies and have tasked over 10,000 people with detecting, reviewing, and removing content that violates our guidelines, the YouTube community also plays an important role in flagging content they think is inappropriate.

- If you see content that you think violates Community Guidelines, you can use [our flagging feature](#) to submit content for review.

We developed the [YouTube Trusted Flagger program](#) to provide additional tools to non-governmental organizations (NGOs) with expertise in a policy area, government agencies, and individuals with high flagging accuracy rates. Participants receive training on YouTube policies and have a direct path of communication with our Trust & Safety specialists. Videos flagged by Trusted Flaggers are not automatically removed. They are subject to the same human review as videos flagged by any other user, but review by our teams may be expedited.

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**RULES AND POLICIES**

## Community Guidelines



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### What action does YouTube take for content that violates Community Guidelines?

YouTube takes action on flagged videos after review by our trained human reviewers. They assess whether the content does indeed violate our policies, and protect content that has an educational, documentary, scientific, or artistic purpose. Our reviewer teams remove content that violates our policies and age-restrict content that may not be appropriate for all audiences. Our automated flagging systems also help us identify and remove spam automatically, as well as re-uploads of content we've already reviewed and determined violates our policies.

## Community Guidelines Strikes

If our reviewers determine that content violates our Community Guidelines, we remove the content and send a notice to the Creator. The first time a Creator violates our Community Guidelines, the Creator receives a warning with no penalty to the channel. After one warning, we'll issue a Community Guidelines strike to the channel and the account will have temporary restrictions. Channels that receive three strikes within a 90-day period will be terminated. Channels that are dedicated to violating our policies or that have a single case of severe abuse of the platform, will bypass our strikes system and be terminated. All strikes and terminations can be appealed if the Creator believes there was an error, and our teams will re-review the decision.

### Resources

[Learn more about Community Guidelines strikes](#) 

[Appeal a Community Guidelines strike](#) 

## Age-Restricting Content

Sometimes content doesn't violate our Community Guidelines, but may not be appropriate for viewers under 18 years of age. In these cases, our review team will place an age restriction on the video so it will not be visible to viewers under 18 years of age, logged-out users, or to those who have [Restricted Mode](#) enabled. Creators can also choose to [age restrict their own content](#) at upload if they think it's not suitable for younger audiences.

### Resources

[Learn more about age-restricted content](#) 

## Related articles

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

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# Exhibit 6

<a href="#">Sign Up</a>	Email or Phone	Password	<a href="#">Log In</a>
	<input type="text"/>	<input type="password"/>	
	<a href="#">Forgot account?</a>		

## Terms of Service

Welcome to Facebook!

Facebook builds technologies and services that enable people to connect with each other, build communities, and grow businesses. These Terms govern your use of Facebook, Messenger, and the other products, features, apps, services, technologies, and software we offer (the [Facebook Products](#) or [Products](#)), except where we expressly state that separate terms (and not these) apply. These Products are provided to you by Facebook, Inc.

We don't charge you to use Facebook or the other products and services covered by these Terms. Instead, businesses and organizations pay us to show you ads for their products and services. By using our Products, you agree that we can show you ads that we think will be relevant to you and your interests. We use your personal data to help determine which ads to show you.

We don't sell your personal data to advertisers, and we don't share information that directly identifies you (such as your name, email address or other contact information) with advertisers unless you give us specific permission. Instead, advertisers can tell us things like the kind of audience they want to see their ads, and we show those ads to people who may be interested. We provide advertisers with reports about the performance of their ads that help them understand how people are interacting with their content. See Section 2 below to learn more.

Our [Data Policy](#) explains how we collect and use your personal data to determine some of the ads you see and provide all of the other services described below. You can also go to your [settings](#) at any time to review the privacy choices you have about how we use your data.

### 1. The services we provide

Our mission is to give people the power to build community and bring the world closer together. To help advance this mission, we provide the Products and services described below to you:

- **Provide a personalized experience for you:** Your experience on Facebook is unlike anyone else's: from the posts, stories, events, ads, and other content you see in News Feed or our video platform to the Pages you follow and other features you might use, such as Trending, Marketplace, and search. We use the data we have - for example, about the connections you make, the choices and settings you select, and what you share and do on and off our Products - to personalize your experience.
- **Connect you with people and organizations you care about:** We help you find and connect with people, groups, businesses, organizations, and others that matter to you across the Facebook Products you use. We use the data we have to make suggestions for you and others - for example, groups to join, events to attend, Pages to follow or send a message to, shows to watch, and people you may want to become friends with. Stronger ties make for better communities, and we believe our services are most useful when people are connected to people, groups, and organizations they care about.
- **Empower you to express yourself and communicate about what matters to you:** There are many ways to express yourself on Facebook and to communicate with friends, family, and others about what matters to you - for example, sharing status updates, photos, videos, and stories across the Facebook Products you use, sending messages to a friend or several people, creating events or groups, or adding content to your profile. We have also developed, and continue to explore, new ways for people to use technology, such as augmented reality and 360 video to create and share more expressive and engaging content on Facebook.
- **Help you discover content, products, and services that may interest you:** We show you ads, offers, and other sponsored content to help you discover content, products, and services that are offered by the many businesses and organizations that use Facebook and other Facebook Products. Section 2 below explains this in more detail.
- **Combat harmful conduct and protect and support our community:** People will only build community on Facebook if they feel safe. We employ dedicated teams around the world and develop advanced technical systems to detect misuse of our Products, harmful conduct towards others, and situations where we may be able to help support or protect our community. If we learn of content or conduct like this, we will take appropriate action - for example, offering help, removing content, removing or restricting

access to certain features, disabling an account, or contacting law enforcement. We share data with other [Facebook Companies](#) when we detect misuse or harmful conduct by someone using one of our Products.

- **Use and develop advanced technologies to provide safe and functional services for everyone:** We use and develop advanced technologies - such as artificial intelligence, machine learning systems, and augmented reality - so that people can use our Products safely regardless of physical ability or geographic location. For example, technology like this helps people who have visual impairments understand what or who is in photos or videos shared on Facebook or Instagram. We also build sophisticated network and communication technology to help more people connect to the internet in areas with limited access. And we develop automated systems to improve our ability to detect and remove abusive and dangerous activity that may harm our community and the integrity of our Products.
- **Research ways to make our services better:** We engage in research to develop, test, and improve our Products. This includes analyzing the data we have about our users and understanding how people use our Products, for example by conducting surveys and testing and troubleshooting new features. Our [Data Policy](#) explains how we use data to support this research for the purposes of developing and improving our services.
- **Provide consistent and seamless experiences across the Facebook Company Products:** Our Products help you find and connect with people, groups, businesses, organizations, and others that are important to you. We design our systems so that your experience is consistent and seamless across the different [Facebook Company Products](#) that you use. For example, we use data about the people you engage with on Facebook to make it easier for you to connect with them on Instagram or Messenger, and we enable you to communicate with a business you follow on Facebook through Messenger.
- **Enable global access to our services:** To operate our global service, we need to store and distribute content and data in our data centers and systems around the world, including outside your country of residence. This infrastructure may be operated or controlled by Facebook, Inc., Facebook Ireland Limited, or its affiliates.

## 2. How our services are funded

Instead of paying to use Facebook and the other products and services we offer, by using the Facebook Products covered by these Terms, you agree that we can show you ads that businesses and organizations pay us to promote on and off the [Facebook Company Products](#). We use your personal data, such as information about your activity and interests, to show you ads that are more relevant to you.

Protecting people's privacy is central to how we've designed our ad system. This means that we can show you relevant and useful ads without telling advertisers who you are. We don't sell your personal data. We allow advertisers to tell us things like their business goal, and the kind of audience they want to see their ads (for example, people between the age of 18-35 who like cycling). We then show their ad to people who might be interested.

We also provide advertisers with reports about the performance of their ads to help them understand how people are interacting with their content on and off Facebook. For example, we provide general demographic and interest information to advertisers (for example, that an ad was seen by a woman between the ages of 25 and 34 who lives in Madrid and likes software engineering) to help them better understand their audience. We don't share information that directly identifies you (information such as your name or email address that by itself can be used to contact you or identifies who you are) unless you give us specific permission. Learn more about how Facebook ads work [here](#).

We collect and use your personal data in order to provide the services described above to you. You can learn about how we collect and use your data in our [Data Policy](#). You have controls over the types of ads and advertisers you see, and the types of information we use to determine which ads we show you. [Learn more](#).

## 3. Your commitments to Facebook and our community

We provide these services to you and others to help advance our mission. In exchange, we need you to make the following commitments:

### 1. Who can use Facebook

When people stand behind their opinions and actions, our community is safer and more accountable. For this reason, you must:

- Use the same name that you use in everyday life.
- Provide accurate information about yourself.
- Create only one account (your own) and use your timeline for personal purposes.

- Not share your password, give access to your Facebook account to others, or transfer your account to anyone else (without our permission).

We try to make Facebook broadly available to everyone, but you cannot use Facebook if:

- You are under 13 years old.
- You are a convicted sex offender.
- We've previously disabled your account for violations of our Terms or Policies.
- You are prohibited from receiving our products, services, or software under applicable laws.

## 2. What you can share and do on Facebook

We want people to use Facebook to express themselves and to share content that is important to them, but not at the expense of the safety and well-being of others or the integrity of our community. You therefore agree not to engage in the conduct described below (or to facilitate or support others in doing so):

1. You may not use our Products to do or share anything:
  - That violates these Terms, our [Community Standards](#), and other terms and policies that apply to your use of Facebook.
  - That is unlawful, misleading, discriminatory or fraudulent.
  - That infringes or violates someone else's rights, including their intellectual property rights.
2. You may not upload viruses or malicious code or do anything that could disable, overburden, or impair the proper working or appearance of our Products.
3. You may not access or collect data from our Products using automated means (without our prior permission) or attempt to access data you do not have permission to access.

We can remove or restrict access to content that is in violation of these provisions.

If we remove content that you have shared in violation of our Community Standards, we'll let you know and explain any options you have to request another review, unless you seriously or repeatedly violate these Terms or if doing so may expose us or others to legal liability; harm our community of users; compromise or interfere with the integrity or operation of any of our services, systems or Products; where we are restricted due to technical limitations; or where we are prohibited from doing so for legal reasons.

To help support our community, we encourage you to [report](#) content or conduct that you believe violates your rights (including [intellectual property rights](#)) or our terms and policies.

We also can remove or restrict access to your content, services or information if we determine that doing so is reasonably necessary to avoid or mitigate adverse legal or regulatory impacts to Facebook.

## 3. The permissions you give us

We need certain permissions from you to provide our services:

1. Permission to use content you create and share: Some content that you share or upload, such as photos or videos, may be protected by intellectual property laws.

You own the intellectual property rights (things like copyright or trademarks) in any such content that you create and share on Facebook and the other [Facebook Company Products](#) you use. Nothing in these Terms takes away the rights you have to your own content. You are free to share your content with anyone else, wherever you want.

However, to provide our services we need you to give us some legal permissions (known as a 'license') to use this content. This is solely for the purposes of providing and improving our Products and services as described in Section 1 above.

Specifically, when you share, post, or upload content that is covered by intellectual property rights on or in connection with our Products, you grant us a non-exclusive, transferable, sub-licensable, royalty-free, and worldwide license to host, use, distribute, modify, run, copy, publicly perform or display, translate, and create derivative works of your content (consistent with your [privacy](#) and [application](#) settings). This means, for example, that if you share a photo on Facebook, you give us permission to store, copy, and share it with others (again, consistent with your settings) such as service providers that support our service or other Facebook Products you use. This license will end when your content is deleted from our systems.

You can delete content individually or all at once by deleting your account. [Learn more](#) about how to delete your account. You can [download a copy](#) of your data at any time before deleting your account.

When you delete content, it's no longer visible to other users, however it may continue to exist elsewhere on our systems where:

- immediate deletion is not possible due to technical limitations (in which case, your content will be deleted within a maximum of 90 days from when you delete it);
- your content has been used by others in accordance with this license and they have not deleted it (in which case this license will continue to apply until that content is deleted); or
- where immediate deletion would restrict our ability to:
  - investigate or identify illegal activity or violations of our terms and policies (for example, to identify or investigate misuse of our Products or systems);
  - comply with a legal obligation, such as the preservation of evidence; or
  - comply with a request of a judicial or administrative authority, law enforcement or a government agency;

in which case, the content will be retained for no longer than is necessary for the purposes for which it has been retained (the exact duration will vary on a case-by-case basis).

In each of the above cases, this license will continue until the content has been fully deleted.

2. Permission to use your name, profile picture, and information about your actions with ads and sponsored content: You give us permission to use your name and profile picture and information about actions you have taken on Facebook next to or in connection with ads, offers, and other sponsored content that we display across our Products, without any compensation to you. For example, we may show your friends that you are interested in an advertised event or have liked a Page created by a brand that has paid us to display its ads on Facebook. Ads like this can be seen only by people who have your permission to see the actions you've taken on Facebook. You can [learn more](#) about your ad settings and preferences.
3. Permission to update software you use or download: If you download or use our software, you give us permission to download and install updates to the software where available.

#### 4. Limits on using our intellectual property.

If you use content covered by intellectual property rights that we have and make available in our Products (for example, images, designs, videos, or sounds we provide that you add to content you create or share on Facebook), we retain all rights to that content (but not yours). You can only use our copyrights or [trademarks \(or any similar marks\)](#) as expressly permitted by our [Brand Usage Guidelines](#) or with our prior written permission. You must obtain our written permission (or permission under an open source license) to modify, create derivative works of, decompile, or otherwise attempt to extract source code from us.

## 4. Additional provisions

### 1. Updating our Terms

We work constantly to improve our services and develop new features to make our Products better for you and our community. As a result, we may need to update these Terms from time to time to accurately reflect our services and practices. Unless otherwise required by law, we will notify you before we make changes to these Terms and give you an opportunity to review them before they go into effect. Once any updated Terms are in effect, you will be bound by them if you continue to use our Products.

We hope that you will continue using our Products, but if you do not agree to our updated Terms and no longer want to be a part of the Facebook community, you can [delete](#) your account at any time.

### 2. Account suspension or termination

We want Facebook to be a place where people feel welcome and safe to express themselves and share their thoughts and ideas.

If we determine that you have clearly, seriously or repeatedly breached our Terms or Policies, including in particular our Community Standards, we may suspend or permanently disable access to your account. We may also suspend or disable your account if you repeatedly infringe other people's intellectual property rights or where we are required to do so for legal reasons.

Where we take such action we'll let you know and explain any options you have to request a review, unless doing so may expose us or others to legal liability; harm our community of users; compromise or interfere with the integrity or operation of any of our

services, systems or Products; or where we are restricted due to technical limitations; or where we are prohibited from doing so for legal reasons.

You can [learn more](#) about what you can do if your account has been disabled and how to contact us if you think we have disabled your account by mistake.

If you delete or we disable your account, these Terms shall terminate as an agreement between you and us, but the following provisions will remain in place: 3, 4.2-4.5.

### 3. Limits on liability

We work hard to provide the best Products we can and to specify clear guidelines for everyone who uses them. Our Products, however, are provided "as is," and we make no guarantees that they always will be safe, secure, or error-free, or that they will function without disruptions, delays, or imperfections. To the extent permitted by law, we also DISCLAIM ALL WARRANTIES, WHETHER EXPRESS OR IMPLIED, INCLUDING THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, TITLE, AND NON-INFRINGEMENT. We do not control or direct what people and others do or say, and we are not responsible for their actions or conduct (whether online or offline) or any content they share (including offensive, inappropriate, obscene, unlawful, and other objectionable content).

We cannot predict when issues might arise with our Products. Accordingly, our liability shall be limited to the fullest extent permitted by applicable law, and under no circumstance will we be liable to you for any lost profits, revenues, information, or data, or consequential, special, indirect, exemplary, punitive, or incidental damages arising out of or related to these Terms or the Facebook Products, even if we have been advised of the possibility of such damages. Our aggregate liability arising out of or relating to these Terms or the Facebook Products will not exceed the greater of \$100 or the amount you have paid us in the past twelve months.

### 4. Disputes

We try to provide clear rules so that we can limit or hopefully avoid disputes between you and us. If a dispute does arise, however, it's useful to know up front where it can be resolved and what laws will apply.

For any claim, cause of action, or dispute you have against us that arises out of or relates to these Terms or the Facebook Products ("claim"), you agree that it will be resolved exclusively in the U.S. District Court for the Northern District of California or a state court located in San Mateo County. You also agree to submit to the personal jurisdiction of either of these courts for the purpose of litigating any such claim, and that the laws of the State of California will govern these Terms and any claim, without regard to conflict of law provisions.

### 5. Other

1. These Terms (formerly known as the Statement of Rights and Responsibilities) make up the entire agreement between you and Facebook, Inc. regarding your use of our Products. They supersede any prior agreements.
2. Some of the Products we offer are also governed by supplemental terms. If you use any of those Products, supplemental terms will be made available and will become part of our agreement with you. For instance, if you access or use our Products for commercial or business purposes, such as buying ads, selling products, developing apps, managing a group or Page for your business, or using our measurement services, you must agree to our [Commercial Terms](#). If you post or share content containing music, you must comply with our [Music Guidelines](#). To the extent any supplemental terms conflict with these Terms, the supplemental terms shall govern to the extent of the conflict.
3. If any portion of these Terms is found to be unenforceable, the remaining portion will remain in full force and effect. If we fail to enforce any of these Terms, it will not be considered a waiver. Any amendment to or waiver of these Terms must be made in writing and signed by us.
4. You will not transfer any of your rights or obligations under these Terms to anyone else without our consent.
5. You may designate a person (called a legacy contact) to manage your account if it is memorialized. Only your legacy contact or a person who you have identified in a valid will or similar document expressing clear consent to disclose your content upon death or incapacity will be able to seek [disclosure](#) from your account after it is memorialized.
6. These Terms do not confer any third-party beneficiary rights. All of our rights and obligations under these Terms are freely assignable by us in connection with a merger, acquisition, or sale of assets, or by operation of law or otherwise.

7. You should know that we may need to change the username for your account in certain circumstances (for example, if someone else claims the username and it appears unrelated to the name you use in everyday life).
8. We always appreciate your feedback and other suggestions about our products and services. But you should know that we may use them without any restriction or obligation to compensate you, and we are under no obligation to keep them confidential.
9. We reserve all rights not expressly granted to you.

## 5. Other terms and policies that may apply to you

- **Community Standards:** These guidelines outline our standards regarding the content you post to Facebook and your activity on Facebook and other Facebook Products.
- **Commercial Terms:** These terms apply if you also access or use our Products for any commercial or business purpose, including advertising, operating an app on our Platform, using our measurement services, managing a group or a Page for a business, or selling goods or services.
- **Advertising Policies:** These policies specify what types of ad content are allowed by partners who advertise across the Facebook Products.
- **Self-Serve Ad Terms:** These terms apply when you use self-serve advertising interfaces to create, submit, or deliver advertising or other commercial or sponsored activity or content.
- **Pages, Groups and Events Policy:** These guidelines apply if you create or administer a Facebook Page, group, or event, or if you use Facebook to communicate or administer a promotion.
- **Facebook Platform Policy:** These guidelines outline the policies that apply to your use of our Platform (for example, for developers or operators of a Platform application or website or if you use social plugins).
- **Developer Payment Terms:** These terms apply to developers of applications that use Facebook Payments.
- **Community Payment Terms:** These terms apply to payments made on or through Facebook.
- **Commerce Policies:** These guidelines outline the policies that apply when you offer products and services for sale on Facebook.
- **Facebook Brand Resources:** These guidelines outline the policies that apply to use of Facebook trademarks, logos, and screenshots.
- **Music Guidelines:** These guidelines outline the policies that apply if you post or share content containing music on Facebook.
- **Live Policies:** These policies apply to all content broadcast to Facebook Live.

Date of Last Revision: October 22, 2020

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# Exhibit 7



## Introduction

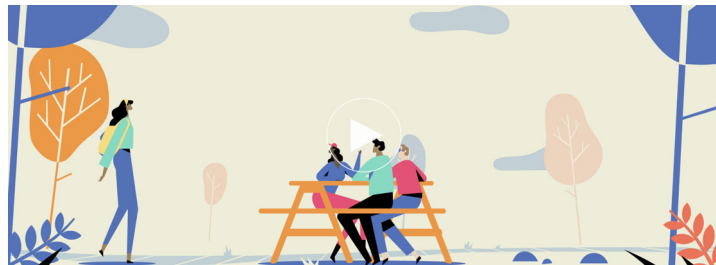
- > [I. Violence and Criminal Behavior](#)
- > [II. Safety](#)
- > [III. Objectionable Content](#)
- > [IV. Integrity and Authenticity](#)
- > [V. Respecting Intellectual Property](#)
- > [VI. Content-Related Requests and Decisions](#)
- > [Additional Information](#)



## COVID-19: Community Standards Updates and Protections

[LEARN MORE](#)

## Community Standards



### INTRODUCTION

Every day, people use Facebook to share their experiences, connect with friends and family, and build communities. We are a service for more than two billion people to freely express themselves across countries and cultures and in dozens of languages.

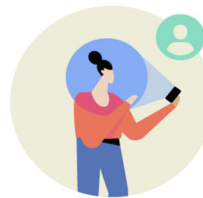
We recognize how important it is for Facebook to be a place where people feel empowered to communicate, and we take seriously our role in keeping abuse off our service. That's why we've [developed a set of Community Standards](#) that outline what is and is not allowed on Facebook. Our policies are based on feedback from our community and the advice of experts in fields such as technology, public safety and human rights. To ensure that everyone's voice is valued, we take great care to craft policies that are inclusive of different views and beliefs, in particular those of people and communities that might otherwise be overlooked or marginalized.



#### REITERATING OUR COMMITMENT TO VOICE

The goal of our Community Standards has always been to [create a place for expression and give people a voice](#). This has not and will not change. Building community and bringing the world closer together depends on people's ability to share diverse views, experiences, ideas and information. We want people to be able to talk openly about the issues that matter to them, even if some may disagree or find them objectionable. In some cases, we allow content for public awareness which would otherwise go against our Community Standards – if it is newsworthy and in the public interest. We do this only after weighing the public interest value against the risk of harm and we look to international human rights standards to make these judgments. As such, we consider the newsworthiness of content posted by anyone, including news organizations and individuals users. For example, we have allowed content that graphically depicts war or the consequences of war where it is important to public discourse.

Our commitment to expression is paramount, but we recognize the internet creates new and increased opportunities for abuse. For these reasons, when we limit expression, we do it in service of one or more of the following values:



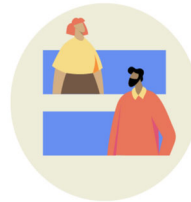
**Authenticity:** We want to make sure the content people are seeing on Facebook is authentic. We believe that authenticity creates a better environment for sharing, and that's why we don't want people using Facebook to misrepresent who they are or what they're doing.



**Safety:** We are committed to making Facebook a safe place. Expression that threatens people has the potential to intimidate, exclude or silence others and isn't allowed on Facebook.



**Privacy:** We are committed to protecting personal privacy and information. Privacy gives people the freedom to be themselves, and to choose how and when to share on Facebook and to connect more easily.



**Dignity:** We believe that all people are equal in dignity and rights. We expect that people will respect the dignity of others and not harass or degrade others.

Our Community Standards apply to everyone, all around the world, and to all types of content. They're designed to be comprehensive – for example, content that might not be considered hateful may still be removed for violating a different policy. We recognize that words mean different things or affect people differently depending on their local community, language, or background. We work hard to account for these nuances while also applying our policies consistently and fairly to people and their expression. Our enforcement of these standards relies on information available to us. In some cases, this means that we may not detect content and behavior that violates these standards, and in others, [enforcement may be limited to circumstances where we have been provided with additional information and context.](#)

Community Standards | Facebook

People can report potentially violating content, including Pages, Groups, Profiles, individual content, and comments. We also give people control over their own experience by allowing them to [block](#), [unfollow](#) or [hide](#) people and posts.

The consequences for violating our Community Standards vary depending on the severity of the violation and the person's history on the platform. For instance, we may warn someone for a first violation, but if they continue to violate our policies, we may restrict their ability to post on Facebook or disable their profile. We also may notify law enforcement when we believe there is a genuine risk of physical harm or a direct threat to public safety.

Our Community Standards are a guide for what is and isn't allowed on Facebook. It is in this spirit that we ask members of the Facebook community to follow these guidelines.

**Please note that the US English version of the Community Standards reflects the most up-to-date set of the policies and should be used as the master document.**

[I. Violence and Criminal Behavior](#)



# Exhibit 8

## Child safety policy

### Child Safety Policy: YouTube Community Guidelines



The safety of our creators, viewers, and partners is our highest priority. We look to each of you to help us protect this unique and vibrant community. It's important you understand our Community Guidelines, and the role they play in our shared responsibility to keep YouTube safe. **Take the time to carefully read the policy below.** You can also check out [this page](#) for a full list of our guidelines.

Update: Content that targets young minors and families but contains sexual themes, violence, obscene, or other mature themes not suitable for young audiences, is not allowed on YouTube. In addition to your titles, descriptions, and tags, ensure your [audience selection](#) matches the audience your content is suitable for.

YouTube doesn't allow content that endangers the emotional and physical well-being of minors. A minor is defined as someone under the legal age of majority – usually anyone younger than 18 years old in most countries/regions.


If you find content that violates this policy, report it. If you believe that a child is in danger, you should get in touch with your local law enforcement to report the situation immediately.

Instructions for reporting violations of our Community Guidelines [are available here](#). If you've found multiple videos or comments that you would like to report, you can [report the channel](#).

## What this policy means for you

### If you're posting content

Don't post content on YouTube if it fits any of the descriptions below.

- **Sexualization of minors:** Sexually explicit content featuring minors and content that sexually exploits minors. We report content containing child sexual abuse imagery to the [National Center for Missing and Exploited Children](#) , who work with global law enforcement agencies.
- **Harmful or dangerous acts involving minors:** Content showing a minor participating in dangerous activities or encouraging minors to do dangerous activities. Never put minors in harmful situations that may lead to injury, including dangerous stunts, dares, or pranks.
- **Infliction of emotional distress on minors:** Content that could cause minor participants or viewers emotional distress, including:
  - Exposing minors to mature themes
  - Simulating parental abuse
  - Coercing minors
  - Violence
- **Misleading family content:** Content that targets young minors and families, but contains:
  - Sexual themes
  - Violence
  - Obscenity or other mature themes not suitable for young audiences
  - Family friendly cartoons that target young minors and contain adult or age-inappropriate themes such as violence, sex, death, drugs and more. Make sure your titles, descriptions, and tags match the audience you're targeting. In

addition, ensure your [audience selection](#) accurately represents the audience your content is suitable for. You can also age restrict your content upon upload if it's intended for [mature audiences](#).

- **Cyberbullying and harassment involving minors:** Content that:
  - Targets individuals for abuse or humiliation
  - Reveals personal information like email addresses or bank account numbers
  - Records someone without their consent
  - Sexually harasses
  - Encourages others to bully or harass

This policy applies to videos, video descriptions, comments, Stories, Community posts, live streams, playlists, and any other YouTube product or feature. Please note this is not a complete list.

---

[Age-restricted content](#)



---

[Content featuring minors](#)



## Examples

Here are some examples of content not allowed on YouTube.

- A video featuring minors involved in provocative, sexual, or sexually suggestive activities, challenges and dares, such as kissing or groping.
- Showing minors involved in dangerous activities. For example, physical stunts, using weapons or explosives, or using a controlled substance like alcohol or nicotine.
- A video with tags like "for children", or whose audience is set to "Yes, it's made for kids", featuring family friendly cartoons engaging in inappropriate acts like injecting needles.

Remember these are just some examples, and don't post content if you think it might violate this policy.

---

[More examples](#)



## What happens if content violates this policy

If your content violates this policy, we'll remove the content and send you an email to let you know. If this is your first time violating our Community Guidelines, you'll get a warning with no penalty to your channel. If it's not, we'll issue a strike against your channel. If you get 3 strikes, your channel will be terminated. You can learn more about [our strikes system here](#).

We have zero tolerance for predatory behavior on YouTube. If we think a child is in danger based on reported content, we'll help law enforcement investigate the content.

### Visit Creator Academy for more

Would you rather learn about our Community Guidelines through videos and quizzes? Check out our new [Creator Academy course](#).

# Exhibit 9

## Harmful or dangerous content policies

### Harmful or Dangerous Content Policy: YouTube Community Guidelines



The safety of our creators, viewers, and partners is our highest priority. We look to each of you to help us protect this unique and vibrant community. It's important you understand our Community Guidelines, and the role they play in our shared responsibility to keep YouTube safe. **Take the time to carefully read the policy below.** You can also check out [this page](#) for a full list of our guidelines.

YouTube doesn't allow content that encourages dangerous or illegal activities that risk serious physical harm or death.

If you find content that violates this policy, report it. Instructions for reporting violations of our Community Guidelines [are available here](#). If you've found a few videos or comments that you would like to report, you can [report the channel](#).

## What this policy means for you

### If you're posting content

Don't post content on YouTube if it fits any of the descriptions noted below.

- **Extremely dangerous challenges:** Challenges that pose an imminent risk of physical injury.
- **Dangerous or threatening pranks:** Pranks that lead victims to fear imminent serious physical danger, or that create serious emotional distress in minors.
- **Instructions to kill or harm:** Showing viewers how to perform activities meant to kill or maim others. For example, giving instructions to build a bomb meant to injure or kill others.
- **Hard drug use or creation:** Content that depicts abuse of or giving instructions on how to create hard drugs such as cocaine or opioids. Hard drugs are defined as drugs that can (mostly) lead to physical addiction.
- **Eating Disorders:** Content that praises, glorifies, or encourages viewers to imitate anorexia or other eating disorders. Eating disorders are characterized by abnormal or disturbed eating habits which negatively affect a person's health (including eating non-food items).
- **Violent Events:** Promoting or glorifying violent tragedies, such as school shootings.
- **Instructional theft or cheating:** Showing viewers how to steal tangible goods or promoting dishonest behavior
- **Hacking:** Demonstrating how to use computers or information technology with the intent to steal credentials, compromise personal data or cause serious harm to others such as (but not limited to) hacking into social media accounts
- **Bypassing payment for digital content or services:** Showing viewers how to use apps, websites, or other information technology to gain unauthorized free access to audio content, audiovisual content, full video games, software, or streaming services that normally require payment.
- **Promoting dangerous remedies or cures:** Content which claims that harmful substances or treatments can have health benefits.

Keep in mind that this isn't a complete list.

Don't post content showing a minor participating in dangerous activity, or encouraging minors to participate in dangerous activities. Never put minors in harmful situations that may lead to injury, including dangerous stunts, dares, or pranks. You can learn more about [Child Safety here](#).

## Age-restricted content



We might allow videos that depict dangerous acts if they're meant to be educational, documentary, scientific, or artistic (EDSA). For example, a news piece on the dangers of choking games would be appropriate, but posting clips out of context from the same documentary might not be.

This policy applies to videos, video descriptions, comments, live streams, and any other YouTube product or feature.

## Examples

Here are some examples of content that's not allowed on YouTube.

### Extremely dangerous challenges



### Dangerous or threatening pranks



### Violent events or instructions to harm



### Drug use



### Eating disorders



### Harmful remedies & cures




Remember these are just some examples, and don't post content if you think it might violate this policy.

## What happens if content violates this policy

If your content violates this policy, we'll remove the content and send you an email to let you know. If this is your first time violating our Community Guidelines, you'll get a warning with no penalty to your channel. If it's not, we'll issue a strike against your channel. If you get 3 strikes, your channel will be terminated. You can learn more about [our strikes system here](#).

-  Visit Creator Academy for more

Would you rather learn about our Community Guidelines through videos and quizzes? Check out our [Creator Academy](#)  course.

# Exhibit 10

## COVID-19 medical misinformation policy



The safety of our creators, viewers, and partners is our highest priority. We look to each of you to help us protect this unique and vibrant community. It's important you understand our Community Guidelines, and the role they play in our shared responsibility to keep YouTube safe. **Take the time to carefully read the policy below.** You can also check out [this page](#) for a full list of our guidelines.

YouTube doesn't allow content about COVID-19 that poses a serious risk of egregious harm.

YouTube doesn't allow content that spreads medical misinformation that contradicts local health authorities' or the World Health Organization's (WHO) medical information about COVID-19. This is limited to content that contradicts WHO or local health authorities' guidance on:

- Treatment
- Prevention
- Diagnostic
- Transmission
- Social distancing and self isolation guidelines
- The existence of COVID-19

**Note:** YouTube's policies on COVID-19 are subject to change in response to changes to global or local health authorities' guidance on the virus. This policy was published on May 20, 2020.

## What this policy means for you

### If you're posting content

Don't post content on YouTube if it includes any of the following:

#### Treatment misinformation:

- Content that encourages the use of home remedies, prayer, or rituals in place of medical treatment such as consulting a doctor or going to the hospital
- Content that claims that there's a guaranteed cure for COVID-19
- Other content that discourages people from consulting a medical professional or seeking medical advice

#### Prevention misinformation: Content that promotes prevention methods that contradict local health authorities or WHO.

- Claims that there is a guaranteed prevention method for COVID-19
  - Claims that any medication or vaccination is a guaranteed prevention method for COVID-19
- Claims about COVID-19 vaccinations that contradict expert consensus from local health authorities or WHO
  - Claims that an approved COVID-19 vaccine will cause death, infertility, or contraction of other infectious diseases
  - Claims that an approved COVID-19 vaccine will contain substances that are not on the vaccine ingredient list, such as fetal tissue
  - Claims that an approved COVID-19 vaccine will contain substances or devices meant to track or identify those who've received it
  - Claims that an approved COVID-19 vaccine will alter a person's genetic makeup
  - Claims that any vaccine causes contraction of COVID-19
  - Claims that a specific population will be required (by any entity except for a government) to take part in vaccine trials or receive the vaccine first

#### Diagnostic misinformation: Content that promotes diagnostic methods that contradict local health authorities or WHO.

#### Transmission misinformation: Content that promotes transmission information that contradicts local health authorities or WHO.

- Content that claims that COVID-19 is not caused by a viral infection
- Content that claims COVID-19 is not contagious
- Content that claims that COVID-19 cannot spread in certain climates or geographies
- Content that claims that any group or individual has immunity to the virus or cannot transmit the virus

**Social distancing and self isolation misinformation:** Content that disputes the efficacy of local health authorities' or WHO's guidance on physical distancing or self-isolation measures to reduce transmission of COVID-19.

#### Content that denies the existence of COVID-19:

- Denial that COVID-19 exists
- Claims that people have not died or gotten sick from COVID-19

- Claims that the virus no longer exists or that the pandemic is over
- Claims that the symptoms, death rates, or contagiousness of COVID-19 are less severe or equally as severe as the common cold or seasonal flu
- Claims that the symptoms of COVID-19 are never severe

## Educational, documentary, scientific or artistic content

We may allow content that violates the misinformation policies noted on this page if that content includes context that gives equal or greater weight to countervailing views from local health authorities or to medical or scientific consensus. We may also make exceptions if the purpose of the content is to condemn or dispute misinformation that violates our policies. This context must appear in the images or audio of the video itself. Providing it in the title or description is insufficient.

## Examples

Here are some examples of content that's not allowed on YouTube:

- Denial that COVID-19 exists
- Claims that people have not died from COVID-19
- Claims that any vaccine is a guaranteed prevention method for COVID-19
- Claims that a specific treatment or medicine is a guaranteed cure for COVID-19
- Claims that certain people have immunity to COVID-19 due to their race or nationality
- Encouraging taking home remedies instead of getting medical treatment when sick
- Discouraging people from consulting a medical professional if they're sick
- Content that claims that holding your breath can be used as a diagnostic test for COVID-19
- Videos alleging that if you avoid Asian food, you won't get the coronavirus
- Videos alleging that setting off fireworks can clean the air of the virus and will prevent the spread of the virus
- Claims that COVID-19 is caused by radiation from 5G networks
- Videos alleging that the COVID-19 test is the cause of the virus
- Claims that countries with hot climates will not experience the spread of the virus
- Videos alleging that social distancing and self-isolation are not effective in reducing the spread of the virus
- Claims that the COVID-19 vaccine will kill people who receive it
- Claims that the COVID-19 vaccine will be used as a means of population reduction
- Videos claiming that the COVID-19 vaccine will contain fetal tissue
- Claims that the flu vaccine causes contraction of COVID-19
- Claims that the COVID-19 vaccine causes contraction of other infectious diseases or makes people more vulnerable to contraction of other infectious diseases
- Claims that the COVID-19 vaccine will contain a microchip or tracking device
- Claims that COVID-19 never causes serious symptoms or hospitalization
- Claims that the death rate from the seasonal flu is higher than the death rate of COVID-19
- Claims that people are immune to the virus based on their race
- Claims that children cannot or do not contract COVID-19
- Claims that there have not been cases or deaths in countries where cases or deaths have been confirmed by local health authorities or the WHO

## What happens if content violates this policy

If your content violates this policy, we'll remove the content and send you an email to let you know. If this is your first time violating our Community Guidelines, you'll get a warning with no penalty to your channel. If it's not, we'll issue a strike against your channel. If you get 3 strikes, your channel will be terminated. You can learn more about [our strikes system here](#).



# Exhibit 11

## Community Standards

**Introduction****I. Violence and Criminal Behavior****II. Safety****6. Suicide and Self-Injury**

7. Child Sexual Exploitation, Abuse and Nudity

8. Sexual Exploitation of Adults

9. Bullying and Harassment

10. Human Exploitation

11. Privacy Violations and Image Privacy Rights

**III. Objectionable Content****IV. Integrity and Authenticity****V. Respecting Intellectual Property****VI. Content-Related Requests and Decisions****Additional Information**

## 6. Suicide and Self-Injury

### Policy Rationale

We care deeply about the safety of the people who use our apps. We regularly consult with experts in suicide and self-injury to help inform our policies and enforcement, and work with organizations around the world to provide assistance to people in distress.

While we don't allow people to intentionally or unintentionally celebrate or promote suicide or self-injury, we do allow people to discuss these topics because we want Facebook to be a space where people can share their experiences, raise awareness about these issues, and seek support from one another.

We define self-injury as the intentional and direct injuring of the body, including self-mutilation and eating disorders. We remove any content that encourages suicide or self-injury, including fictional content such as memes or illustrations and any self-injury content which is graphic, regardless of context. We also remove content that identifies and negatively targets victims or survivors of suicide or self-injury seriously, humorously or rhetorically, as well as real time depictions of suicide or self-injury. Content about recovery of suicide or self-harm that is allowed, but may contain imagery that could be upsetting, such as a healed scar, is placed behind a sensitivity screen.

When people post or search for suicide or self-injury- related content, we will direct them to local organizations that can provide support and if someone is at immediate risk of harming themselves, we will contact local emergency services to get them help.

With respect to live content, experts have told us that if someone is saying they intend to attempt suicide on a livestream, we should leave the content up for as long as possible, because the longer someone is talking to a camera, the more opportunity there is for a friend or family member to call emergency services.

However, to minimize the risk of others being negatively impacted by viewing this content, we will stop the livestream at the point at

which the threat turns into an attempt. As mentioned above, in any case, we will contact emergency services if we identify someone is at immediate risk of harming themselves.

#### Do not post:

Content that promotes, encourages, coordinates, or provides instructions for

- Suicide
- Self-injury
- Eating disorders

Content that depicts graphic self-injury imagery

Except in limited situations of newsworthiness, it is against our policies to post content depicting a person who engaged in a suicide attempt or death by suicide

Content that focuses on depiction of ribs, collar bones, thigh gaps, hips, concave stomach, or protruding spine or scapula when shared together with terms associated with eating disorders.

Content that contains instructions for drastic and unhealthy weight loss when shared together with terms associated with eating disorders.

Content that mocks victims or survivors of suicide, self-injury or eating disorders who are either publicly known or implied to have experienced suicide or self-injury

For the following content, we restrict content to adults over the age of 18, and include a sensitivity screen so that people are aware the content may be upsetting:

- Photos or videos depicting a person's death by suicide that are determined to be newsworthy

- Photos or videos depicting a person who engaged in euthanasia/assisted suicide in a medical setting

For the following content, we include a sensitivity screen so that people are aware the content may be upsetting to some:

- Content that depicts older instances of self-harm such as healed cuts or other non-graphic self-injury imagery in a context of recovery
- Content that depicts ribs, collar bones, thigh gaps, hips, concave stomach, or protruding spine or scapula in a recovery context.

We provide resources to people who post written or verbal admissions of engagement in self injury, including:

- Suicide
- Euthanasia/assisted suicide
- Self-harm
- Eating disorders

For the following Community Standards, we require additional information and/or context to enforce:

- We may remove suicide notes when we have confirmation of a suicide or suicide attempt. We try to identify suicide notes using several factors, including but not limited to, family or legal representative requests, media reports, law enforcement reports or other third party sources (e.g., government agencies, NGOs).

7. Child Sexual Exploitation, Abuse and Nudity



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Report Abuse

# Exhibit 12



Search the Community Standards

[Introduction](#)[I. Violence and Criminal Behavior](#)

- [1. Violence and Incitement](#)
- [2. Dangerous Individuals and Organizations](#)
- 3. Coordinating Harm and Publicizing Crime**
- [4. Regulated Goods](#)
- [5. Fraud and Deception](#)

[II. Safety](#)[III. Objectionable Content](#)[IV. Integrity and Authenticity](#)[V. Respecting Intellectual Property](#)[VI. Content-Related Requests and Decisions](#)[Additional Information](#)

## 3. Coordinating Harm and Publicizing Crime

### Policy Rationale

In an effort to prevent and disrupt offline harm and copycat behavior, we prohibit people from facilitating, organizing, promoting, or admitting to certain criminal or harmful activities targeted at people, businesses, property or animals. We allow people to debate and advocate for the legality of criminal and harmful activities, as well as draw attention to harmful or criminal activity that they may witness or experience as long as they do not advocate for or coordinate harm.



Do not post content that falls into the following categories:

#### Harm against people

- Depicting, admitting to or promoting acts of physical harm against people, including acts of domestic violence - except when shared in the context of redemption or defense.
- Swatting - specifically statements of intent, calls to action, representing, supporting, advocating for, depicting, admitting to or speaking positively about it.
- Depicting, promoting, advocating for or encouraging participation in a high risk viral challenge.
- Promoting or advocating for harmful miracle cures for health issues.
- Coordinating, depicting, admitting to or promoting active and deliberate spread of communicable diseases by you or your associates

#### Harm against animals

Statements of intent, calls to action, representing, supporting or advocating for, or depicting, admitting to or promoting:

- Acts of physical harm against animals committed by you or your associates except in cases of hunting, fishing, religious sacrifice, food preparation or processing, pest or vermin, self-defense or redemption
- Staged animal vs. animal fights, including acts committed by a third party

#### Harm against property

Statements of intent, calls to action, representing, supporting or advocating for harm against property that depicts, admits to, or promotes the following acts committed by you or your associates:

- Vandalism
- Hacking when the intent is to hijack a domain, corrupt or disrupt cyber systems, seek ransoms, or gain unauthorized access to data systems
- Theft when committed by you or your associates, as well as positive statements about theft when committed by a third party

#### Voter and/or Census Fraud

- Offers to buy or sell votes with cash or gifts
- Statements that advocate, provide instructions, or show explicit intent to illegally participate in a voting or census process

#### Voter and/or Census Interference

- Misrepresentation of the dates, locations, and times, and methods for voting or voter registration or census participation
- 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.
- Misrepresentation of who can participate in the census and what information or materials must be provided in order to participate
- Content claiming that the U.S. Immigration and Customs Enforcement (ICE) is at a voting location
- Explicit claims that people will be infected by COVID (or another communicable disease) if they participate in the voting process.



For the following content, we include a label so that people are aware the content may be sensitive:

- Imagery depicting a high risk viral challenge if shared with a caption that condemns or raise awareness of the associated risks



For the following Community Standards, we require additional information and/or context to enforce:

Do not post:

- Content revealing the identity of someone as a witness, informant, activist, or individuals whose identity or involvement in a legal case has been restricted from public disclosure
- Imagery that is likely to deceive the public as to its origin if:
  - The entity depicted or an authorized representative objects to the imagery, and
  - The imagery has the potential to cause harm to members of the public
- Other misrepresentations related to voting in an official election or census participation may be subject to false news standards, as referenced in [section 20](#)
- Misrepresentation of whether a candidate is running or not

- Calls for coordinated interference that would affect an individual's ability to participate in an official census or election
- Content stating that census or voting participation may or will result in law enforcement consequences (for example, arrest, deport or imprisonment)
- Misrepresentation of government involvement in the census, including, where applicable, that an individual's census information will be shared with another (non-census) government agency
- Statements of intent, support, or advocacy to go to an election site, voting location, or vote counting location when the purpose of going to the site is to monitor or watch voters or election officials' activity using militaristic language (e.g. "war," "army," or "soldier" ) or an expressed goal to intimidate, exert control or display power (e.g. "let's show them who's boss!," "if they're scared, they won't vote!")
- Content coordinating interference with the administration of the COVID-19 vaccine
- Content calling to action, advocating, or promoting that others not get the COVID-19 vaccine

[2. Dangerous Individuals and Organizations](#)[4. Regulated Goods](#)

# Exhibit 13

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Highwire with Del Bigtree


E32JXWWex6s

Job no. 4482048-1

Transcribed by: Sonya Ledanski Hyde

Pages 1 - 9

<p>1 DEL BIGTREE: I could keep parading 2 scientists, and I will, across this show. But 3 let's not forget, the simple truth is this has a 4 deathrate of .26 percent. But, by the way, that 5 was of the entire population if we looked at it. 6 Now, we're thinking, could it just be 7 .26 percent of only 20 percent of us? I actually 8 ran that number on my phone as I was sitting 9 there. I can't -- I don't know if you can see 10 that, but that is your chance, as an American, 11 given that 80 percent of you may already be 12 immune. 13 If you're wearing a mask, if you're 14 terrified right now, if you don't want to come 15 out of the house -- if you're scowling at Del 16 Bigtree who is in your store not wearing a mask 17 right now, just know that you are apparently 18 terrified of a .0005 -- it turned off -- there it 19 is. That's -- that is the risk right now. That 20 is your death rate right now in America given the 21 popular science. 22 Maybe three weeks from now this may be 23 adjusted a little bit. And what is that group? 24 What is the group that are really at risk? Let's 25 be honest about this. I'm going to say something</p> <p style="text-align: right;">Page 2</p>	<p>1 right now. I don't care if I live to be 100 2 years old. I want to enjoy my life right now. I 3 like the finer things in life. I like good rich 4 food. I like smoking a cigarette once in a 5 while. I like to drink my drinks. 6 And you know what? Good on you. 7 That's the United States of America. I have no 8 problem with that. Some of my best friends think 9 like that. It's great and they're fun to hang 10 out with. That is perfectly okay. 11 But here's what's not okay. When you 12 reach that point in your life where now your 13 arteries are starting to clog up, your body is 14 shutting down, and the alcohol is eating up your 15 liver, and you have diabetes or you have multiple 16 -- COPD, you have asthma where you can't breathe 17 -- all the cigarette smoking finally caught up 18 with you. You have heart disease because of the 19 way you decide to live your life in the moment. 20 Here's what you are now. You are pharmaceutical 21 dependent. You did that to yourself, not me. 22 You decided that the moment mattered 23 and now you find yourself pharmaceutical 24 dependent, which is really what that .26 percent 25 is. And that's okay too. Thank God, there's</p> <p style="text-align: right;">Page 4</p>
<p>1 that might get me in some trouble here, but let's 2 be honest. 3 That group is very well known. People 4 over the age of 65 -- not just because you're 5 over the age of 65, but you're sick with other 6 diseases. You have heart disease. You have 7 COPD. You have diabetes. You have issues. Many 8 of those issues coming from the fact that you 9 didn't treat your body very well while you were 10 alive on this planet. 11 And I want to talk about this for one 12 second as I close this down. That .26 percent 13 are the most sick among us. And I have nothing 14 against you. Go ahead and bubble wrap your 15 house, please. Lock yourself in your basement. 16 Go and do what's necessary. 17 But here's the problem. When you were 18 my age, you were most likely eating food and fast 19 food and Doritos and drinking Coca-Cola, which 20 you will never find in my home. You were eating 21 that all the time. You probably were drinking a 22 lot of different alcoholic beverages and really 23 liked to party. And probably really enjoyed your 24 cigarettes. And you said to yourself, you know 25 what? It's more about the quality of my life</p> <p style="text-align: right;">Page 3</p>	<p>1 drugs out there. There's drugs that allow you to 2 eat that Philly Cheesesteak even though your body 3 knows it hates it. But go ahead. Take the 4 Prilosec. What difference does it make. Drug 5 yourself. Drug yourself. Get through the day. 6 Don't exercise. Maybe just attach a little 7 electrode and see if electrocuting your stomach 8 will give you the abs you want. Come on. 9 Grow up. You made your choices. And 10 now that you're pharmaceutically dependent, 11 here's what you don't get to do. You don't get 12 to say, I have to take a drug to protect you. 13 That's what this is. You don't get to say, I 14 have to wear a mask and suck in my own CO2 to 15 protect you. You don't get to say, I have to 16 lock myself in my basement and destroy my career 17 and take away my own ability to feed my children 18 because you are pharmaceutical dependent. 19 You lived your life. You made your 20 choice. And thank God we live in the United 21 States of America, so you don't have to worry 22 about grocery police standing outside of a 23 grocery store saying, really? You really need 24 four liters of Coca-Cola? You really need four 25 bags of Doritos or Cheetos or Fritos or whatever</p> <p style="text-align: right;">Page 5</p>

<p>1 the heck it is. Or little cupcakes with  2 synthetic icing on it. Do you really need all  3 that? Because we could go there, right.  4 If we're really going to get in each  5 other's shiznit, that's what we could do. Or can  6 we live and let live? Eat all the Twinkies you  7 want. Drink all the bourbon you want and smoke  8 as many cigarettes as you want. And when you  9 find yourself pharmaceutical dependent, I will go  10 ahead and say, thank God the drug companies are  11 there for you. But you do not get to make me  12 pharmaceutical dependent.  13 You do not get to put me in the way of  14 Heidi Larson who wants to eradicate natural  15 health and natural herd immunity and make us all  16 pharmaceutical depend. No. She only gets to  17 rule your life because you lived in a way that  18 you are going to need drugs to survive.  19 And, by the way, if you're wearing a  20 mask right now -- if you're locked in your  21 basement -- if you're at a grocery store and  22 you're scowling at me and you aren't  23 pharmaceutical dependent, and you are living a  24 decent life, you may want to think about taking  25 that mask off. You may want to think about</p> <p style="text-align: right;">Page 6</p>	<p>1 of us, or maybe we're not even in that category,  2 let's give it a college try to catch this cold so  3 that we can protect the pharmaceutical dependent  4 amongst us.  5 That though they lived our lives, we  6 still love them. And they need us to establish  7 herd immunity quick, before we destroy the world  8 we live in and can't do anything for anybody.  9 So, join me. Let's save the world, shall we?  10 I'm up for a cold. Grab your vitamin C, your  11 vitamin D, your magnesium, your zinc. Let's do  12 this.  13 If you liked that clip, then be sure to  14 check out our live broadcast of the Highwire  15 every Thursday morning at 11:00 a.m. Pacific  16 time. You can watch it on Facebook, YouTube,  17 iTunes, and twitter. We'll see you there.  18  19  20  21  22  23  24  25</p> <p style="text-align: right;">Page 8</p>
<p>1 coming out in the sunshine and getting some  2 vitamin D because, you know what? I do care  3 about my pharmaceutical dependent friends. And  4 the only thing I can do for them in -- you know,  5 beyond wishing for a vaccine unicorn, is to  6 actually catch what is just a common cold.  7 Oh, my God. I got you, right? You're  8 going nuts right now. You're saying, wait? He  9 said common cold? I thought people were  10 comparing this to the flu. No, let me be  11 perfectly clear. This is not even a flu.  12 For 99.74 percent of us. You won't  13 probably even have a fever or a cough. Because  14 that's as described, this is one of the most mild  15 illnesses there is. So mild, you are probably  16 what is called an asymptomatic carrier. You  17 don't even know you have it. That's how mild  18 this is.  19 It's a common cold for 99.74 percent of  20 us. The non-pharmaceutical dependent people.  21 So, here's what we do. Let's go outside. Let's  22 take off our masks. We're not on drugs and we  23 don't need to be on drugs. Let's catch this  24 cold.  25 Whether or not it's just the 20 percent</p> <p style="text-align: right;">Page 7</p>	<p>1 CERTIFICATION  2  3 I, Sonya Ledanski Hyde, certify that the  4 foregoing transcript is a true and accurate  5 record of the proceedings.  6 Dated: March 10, 2021  7  8  9  10   11 veritext Legal Solutions  12 330 Old Country Road  13 Suite 300  14 Mineola, NY 11501  15  16  17  18  19  20  21  22  23  24  25</p> <p style="text-align: right;">Page 9</p>

**[0005 - food]**

<b>0</b>	<b>alive</b> 3:10	<b>cheetos</b> 5:25	<b>destroy</b> 5:16 8:7
<b>0005</b> 2:18	<b>allow</b> 5:1	<b>children</b> 5:17	<b>diabetes</b> 3:7 4:15
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<b>100</b> 4:1	<b>apparently</b> 2:17	<b>cigarettes</b> 3:24 6:8	<b>diseases</b> 3:6
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**[foregoing - risk]**

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**[road - zinc]**

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# Exhibit 14

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Highwire with Del Bigtree


229cvY7UHbE

Job no. 4482048-2

Transcribed by: Sonya Ledanski Hyde

Pages 1 - 6

<p>1 DEL BIGTREE: This is my son, Ever.  2 Ever is 11 years old. And here in Texas, the  3 mandate right now is that 10 and over have got to  4 wear masks. Ever has to wear a mask wherever we  5 go, so we bought this thing this week. this is -  6 - this measures the amount of CO2 that's in the  7 air.  8 Please look at the OSHA numbers.  9 Carbon dioxide levels and potential health  10 problems are indicated below. From 250 to 350 is  11 the background normal outdoor level. 350 to 1000  12 ppm, typical level found in occupied spaces with  13 good air exchange. 1000 - 2000 level associated  14 with complains of drowsiness and poor air. So,  15 obviously, I don't want Ever to have drowsiness  16 or poor air. 2000 to 5000 -- level associated  17 with headaches, sleepiness, and stagnant, stale,  18 stuffy air; poor concentration, loss of  19 attention, increased heart rate and slight nausea  20 may also be present. And then, 5000 ppm or more  21 -- this indicates unusual air conditions where  22 high levels of the other gases also could be  23 present. Toxicity or oxygen deprivation could  24 occur. Meaning, do not hit 5000.  25 All right, here we go. Right now,</p> <p style="text-align: right;">Page 2</p>	<p>1 putting on your baby. Take a look at this.  2 Deep calm breathing. I think we got  3 the idea right if you notice --  4 All right, let's try this one. Plastic  5 face shield. Now, just breathe, Ever. I mean,  6 obviously, it looks like there's air all over.  7 But even this, you can tell the CO2 gas is  8 getting caught in by his face. Clearly not as  9 much as wearing a mask, but aren't you shocked  10 that this is having any effect at all. We're up  11 to 1500. We're nearing 2000 even with this.  12 Let's see if it's still going up. Still going  13 up. It collects inside of this mask. I've seen  14 videos of children in Asia wearing these masks in  15 school. Sometimes, this and a mask. Imagine  16 what that does to you.  17 So, we've hit 2000. Which is -- now we  18 know is not safe for any school or any work place  19 environment. Four thousand. Now we're going  20 over 5000. Now we're into what's known to be a  21 danger zone -- 6000 parts per million CO2 --  22 6600. This is a cloth mask. I thought when I  23 was wearing a cloth -- I thought when I was  24 wearing a cloth mask that this was actually  25 safer. So up in the 9000s with both of these</p> <p style="text-align: right;">Page 4</p>
<p>1 we're at 848. So, I'm going to go ahead and just  2 insert this right -- like as he did. Right  3 underneath and trying to keep it -- that feels  4 pretty tight right there, right?  5 EVER BIGTREE: Mm hm.  6 DEL BIGTREE: Okay, so you can, you  7 know, just breathe naturally and let's just see  8 what happens. Okay. All right. So we're at  9 1367 -- we've already just passed 2. So, now  10 we're in the place where he could be having  11 headaches. He can be -- oh, we're at 3786. Look  12 at this. We've just passed 5000. Now we're in  13 the toxic level. Right now, we can be doing this  14 -- 7000 inside this mask. The CO2 -- seven --  15 8000 parts per million.  16 And now, he's -- this things gone off  17 the Richter scale folks. It can't even register  18 how high the CO2 levels are inside. And look how  19 many seconds that was. All right.  20 EVER BIGTREE: Can I just --  21 DEL BIGTREE: Yeah, you want to take  22 that off? Just in case you're thinking to  23 yourself, well that was a really good mask. That  24 was an N95 mask. Just before the show, we tested  25 a couple of different things that may put -- be</p> <p style="text-align: right;">Page 3</p>	<p>1 masks. Upper 8000s. Unbelievable.  2 At the center of all of this is  3 children, right. I think that's the biggest  4 discussion. Do your children really need to wear  5 this coming in to school? I see babies in  6 strollers wearing masks. How safe is that if  7 they're at 10,000 parts per million of CO2.  8 Are you adhering to laws from your  9 government that are hurting the development of  10 your child's brain?  11  12  13  14  15  16  17  18  19  20  21  22  23  24  25</p> <p style="text-align: right;">Page 5</p>

<p>1 CERTIFICATION</p> <p>2</p> <p>3 I, Sonya Ledanski Hyde, certify that the</p> <p>4 foregoing transcript is a true and accurate</p> <p>5 record of the proceedings.</p> <p>6 Date: March 10, 2021</p> <p>7</p> <p>8</p> <p>9</p> <p>10 </p> <p>11 veritext Legal Solutions</p> <p>12 330 Old Country Road</p> <p>13 Suite 300</p> <p>14 Mineola, NY 11501</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>Page 6</p>	

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**[looks - zone]**

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# Exhibit 15

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Highwire with Del Bigtree

gJUjnY\_FGNQ.mp4

Job no. 4482048-3

Transcribed by: Sonya Ledanski Hyde

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<p>1 DEL BIGTREE: Did you notice that this 2 show doesn't have any commercials? I'm not 3 selling you diapers or vitamins or smoothies or 4 gasoline. That's because I don't want corporate 5 sponsors telling us what to investigate and what 6 to say. 7 Instead, you're our sponsors. This is 8 a production by our non-profit, the Informed 9 Consent Action Network. If you want more 10 investigations, more hard-hitting news, if you 11 want the truth, go to icandecide.org and donate 12 now. 13 Good morning. Good afternoon. Good 14 evening. Wherever you are out there in the 15 world. Are you psyched to get out on The 16 Highwire? I know I am. 17 This is one of those shows where we 18 have so much information to bring today. I'm not 19 sure if I could contain it. If you can't tell, 20 my head's, like, about to explode right now. 21 Such a gigantic show. I feel like when I was 22 taking my son on his first, like, black diamond 23 year. Tips like heading over the edge, you're 24 thinking, wow. This looks so steep. Are we 25 going to make it through?</p> <p style="text-align: right;">Page 2</p>	<p>1 to know is we're a fully transparent news show. 2 So, if you question our data or our information 3 or what we're saying about a study or a lawsuit, 4 all you have to do right now is type in I-C-A-N 5 into the comments, and we will send you all of 6 the info that we're discussing on this show. 7 If you're not watching on Facebook, 8 like YouTube or iTunes, you're listing to a 9 podcast. Or perhaps, you're on our website, 10 thehighwire.com, which I want all of you sign up 11 to in case we ever get kicked off of Facebook or 12 some other social media platform -- if you're on 13 thehighwire.com or any of those platforms, all 14 you do is text 33222 and type in ICAN in the 15 message, and we will send you the information 16 from today's show. There is a mountain of it. 17 So, let's get talking about 18 coronavirus. Now, last week, I proposed a theory 19 -- an idea that, you know, what if they made a 20 vaccine for coronavirus back when we had dealt 21 with SARS. We knew that they had made a SARS 22 coronavirus or they attempted to. We know that 23 in the animal studies -- that in those animal 24 studies, as I discussed last week -- if you 25 haven't seen it, go back and watch last week's</p> <p style="text-align: right;">Page 4</p>
<p>1 You're going to be with me on this. 2 This is going to be a heck of a ride. Coming up, 3 near the end of the show, I've got Dr. James 4 Neuenschwander, who gave an amazing speech at 5 ACIP just last week. He's going to be discussing 6 this gigantic rise in diabetes across the nation. 7 Also, we're going to talk about -- the 8 discussion of Alzheimer's is on the rise in 9 incredible numbers. Another issue. People are 10 getting sick all across this country. And then, 11 the biggest lawsuit win we've had yet for the 12 Informed Consent Action Network. I'm going to be 13 discussing that. What did we win? What does it 14 mean? 15 But before that, you know, yesterday, I 16 walked to the office and said, you know, I think 17 we've got to stay on coronavirus. There's just 18 too much going on with coronavirus to avoid it. 19 Even though I feel like we just dealt with it all 20 last week. It's still going. And there's more 21 happening. And I want you to know that you can 22 come to The Highwire and get information you can 23 trust. 24 As always, if you're brand new and 25 you're hearing about this show, what I want you</p> <p style="text-align: right;">Page 3</p>	<p>1 show. But very quickly, the vaccine, when they 2 gave it to the animals in multiple animal 3 studies, the vaccine looked like it worked. 4 They had an anti-gen response, you 5 know. They had immune response. Everything 6 looked great. But then, when they did the 7 challenge, when they put the coronavirus -- the 8 SARS coronavirus on those animals, the animals 9 bodies actually overreacted and went into a 10 cytokine storm in many of them. They have 11 respiratory issues. Many died. It was a very, 12 very bad outcome for those animals. 13 So much so that multiple studies came 14 to the same conclusion which they said there's a 15 warning -- we should be very careful about going 16 forward with human trials because of this 17 response. The vaccine was making the animals 18 more vulnerable to disease than protecting them. 19 Now, I said that last week. I said 20 that there's a, you know, we know that they 21 tested a vaccine on some people in China. We 22 also know that they started a vaccine program on 23 December 1st of last year, right when we heard 24 about the first case of this new COVID-19. 25 But, you know, the question was, did</p> <p style="text-align: right;">Page 5</p>

<p>1 they attempt to give a SARS coronavirus to their 2 population? Would that explain the high rates of 3 death? Maybe people are dying the same way we 4 saw it in animals. 5 Now, I've said it was a theory. It's 6 just a theory. Maybe it didn't happen. But it's 7 possible. It's possible it could happen. And no 8 one else is covering this on mainstream news. 9 You're not hearing from FOX or MSNBC or NBC or 10 ABC that there's the potential that the vaccine 11 could actually do more harm. Could actually put 12 -- make you more vulnerable to a disease. 13 You're not hearing it even though it's 14 being said to the President of the United States. 15 That's right. We have video to show you today 16 from the large press conference that took place 17 with Donald Trump. Listen to this discussion and 18 listen to one of the scientists and doctors there 19 explain -- Houston, there could be a problem. 20 Let's be careful. 21 Remember, last week I said, be careful 22 about rushing a vaccine. Well, Trump heard the 23 same thing in his own office. Take a look at 24 this. 25 (VIDEO)</p> <p style="text-align: right;">Page 6</p>	<p>1 Right. I mean, I like the sound of a couple of 2 months better if I must be honest with you. 3 ALEX AZAR: Wait, but when you say, 4 June Phase one initiation, though -- right? In 5 June? 6 DANIEL MENICHELLA: Yeah. 7 ALEX AZAR: Not a completed vaccine? 8 DANIEL MENICHELLA: Well, you would 9 have a vaccine that would be ready for testing in 10 phase one -- 11 ALEX AZAR: But are you -- 12 DANIEL MENICHELLA: (indiscernible) 13 talking about a completed -- 14 DONALD TRUMP: Ready to use when, would 15 you say? Ready to use? 16 DANIEL MENICHELLA: I think -- 17 DONALD TRUMP: For next season? 18 DANIEL MENICHELLA: So, assuming that 19 the vaccine is well tolerated -- it's safe and 20 efficacious, as John said -- then I think the 21 question is, how do we work with the FDA to 22 expedite that as fast as possible through some 23 sort of fast-track program to get it through 24 phase two and three testing to go -- 25 DONALD TRUMP: So quickly.</p> <p style="text-align: right;">Page 8</p>
<p>1 DONALD TRUMP: So, you're talking over 2 the next few months, you think you could have a 3 vaccine? 4 STÉPHANE BANCEL: Correct. Correct. 5 With phase two. 6 ANTHONY FAUCI: Yeah, you won't have a 7 vaccine. You'll have a vaccine to go into 8 testing. 9 STÉPHANE BANCEL: Phase two, yes. 10 DONALD TRUMP: And how long would that 11 take? 12 STÉPHANE BANCEL: The phase two would 13 take a few months before going to phase three. 14 DONALD TRUMP: All right. So you're 15 talking within a year... 16 ANTHONY FAUCI: Like I've been telling 17 you. 18 DONALD TRUMP: But Lenny is talking 19 about two months, right? 20 STÉPHANE BANCEL: A little -- a little 21 longer. A little longer. 22 DANIEL MENICHELLA: And we would be 23 there in June. We will be there in June if they 24 -- 25 DONALD TRUMP: In a couple of months?</p> <p style="text-align: right;">Page 7</p>	<p>1 DANIEL MENICHELLA: So, as quickly as 2 possible. Absolutely. 3 DONALD TRUMP: What do you say to that, 4 Lenny? 5 LEONARD SCHLEIFER: Look, I sense the 6 cautiousness of Dr. Fauci, and he's right to be 7 cautious because vaccines have to be tested 8 because there's precedence of vaccines to 9 actually make disease worse. And you really 10 don't want to make it -- you don't want to rush 11 and treat a million people and find out you're 12 making 900,000 of them worse. 13 DONALD TRUMP: That's a good idea. 14 LEONARD SCHLEIFER: So -- yeah. So, 15 that's why, I think, why Dr. Fauci is being a 16 little bit cautious. I don't want to speak for 17 him but -- so, we need to prove that. 18 You know, I think that with our 19 technology, by knowing that we have neutralizing 20 antibodies that would give -- we know that this 21 approach worked for Ebola, we know that it worked 22 for MERS in animals. We have a greater degree of 23 confidence that this would work sooner, I think. 24 DONALD TRUMP: Good. Okay. 25 LEONARD SCHLEIFER: I think the way it</p> <p style="text-align: right;">Page 9</p>

<p>1 is.</p> <p>2 DONALD TRUMP: Thank you very much.</p> <p>3 (END OF VIDEO)</p> <p>4 DEL BIGTREE: Isn't that fascinating?</p> <p>5 So, just -- so to recap there, Trump --</p> <p>6 ultimately, we're hearing everybody talk about,</p> <p>7 like, timelines. He's asking how long would it</p> <p>8 take. Which are all really, I think, decent</p> <p>9 questions. You know, it was a good conversation.</p> <p>10 And then, he says, Lenny, what do you</p> <p>11 think? And we found out Lenny is Leonard</p> <p>12 Schleifer who is the CEO and Founder of</p> <p>13 Regeneron. This is a company that, obviously,</p> <p>14 has slapped the buzzer with everybody else in</p> <p>15 this giant game, Who can get the eight point --</p> <p>16 what is it? Three, four billion dollars that our</p> <p>17 government is now putting out for a vaccine and</p> <p>18 taking care of coronavirus?</p> <p>19 Billions of dollars on the table.</p> <p>20 Everybody wants some. And you can imagine, like,</p> <p>21 this is a cash cow. But Lenny makes the</p> <p>22 statement -- he says, you know, I don't want to</p> <p>23 speak for Tony Fauci, but I think there's some</p> <p>24 reticence when you listen to him because we know</p> <p>25 there's precedent -- I just wrote this down --</p> <p style="text-align: right;">Page 10</p>	<p>1 He even said, there's the potential</p> <p>2 that if we rush a vaccine on to the market, we</p> <p>3 could give it to a million people and 900,000 of</p> <p>4 them get even sicker. Trump says something like,</p> <p>5 we don't want to do that. Obviously, we don't</p> <p>6 want to do that. That was the entire point of</p> <p>7 last week's show.</p> <p>8 So now you know from The Highwire we</p> <p>9 have proved that even top scientists know there's</p> <p>10 precedent for a vaccine potentially making people</p> <p>11 more sick.</p> <p>12 Now, let's talk about the numbers</p> <p>13 because this thing is getting really out of</p> <p>14 control. I mean, I'm hearing even in my, you</p> <p>15 know, now I'm sure you've had it too. In the</p> <p>16 school my children go to, we got an official</p> <p>17 notice what we're going to do about COVID-19.</p> <p>18 We're all washing our hands more. Elbow bumps</p> <p>19 between our kids. No hugging allowed. I don't</p> <p>20 know how long that's supposed to last. I don't</p> <p>21 know if you want your kids hugging in 3rd grade</p> <p>22 anyway. But that's a whole other discussion.</p> <p>23 But the point being, you know, it's now</p> <p>24 our school, our children are being, you know,</p> <p>25 they're having -- I even -- we even got a notice</p> <p style="text-align: right;">Page 12</p>
<p>1 there's precedent that vaccines can make diseases</p> <p>2 worse.</p> <p>3 This is what I told you about last</p> <p>4 week. No one else is talking about this. But</p> <p>5 here on The Highwire, we told you the precedent,</p> <p>6 What he's saying is we know there's animal</p> <p>7 studies where the animals got more sick and many</p> <p>8 died from, you know, the virus instead of</p> <p>9 protecting against it. And that's the problem</p> <p>10 with the coronavirus vaccine.</p> <p>11 I think it's ironic when we think about</p> <p>12 this -- that we've, you know, we've said for as</p> <p>13 long I've been alive -- and probably before that</p> <p>14 -- there's no cure for the common cold. I mean,</p> <p>15 that's an interesting thought when you think,</p> <p>16 well, we have flu vaccines. We've got measles</p> <p>17 vaccines. We've got all these other things. But</p> <p>18 the coronavirus, by the way, is the common cold.</p> <p>19 And for some reason, medicine has</p> <p>20 always had trouble saying -- officially --</p> <p>21 there's no cure for the common cold. Well now,</p> <p>22 all of a sudden, we're going to rush a cure.</p> <p>23 We're going to rush to a vaccine for coronavirus.</p> <p>24 And you're hearing from them inside the room,</p> <p>25 well, there is precedence.</p> <p style="text-align: right;">Page 11</p>	<p>1 from our school -- how to talk to your child</p> <p>2 about COVID-19. So this is becoming a really big</p> <p>3 deal and people are freaked out. I walk through</p> <p>4 the grocery stores. You hear it being talked</p> <p>5 about everywhere you go.</p> <p>6 And I want to talk about the death rate</p> <p>7 because this is something we're going to see. I</p> <p>8 mean, whether or not this, you know, the question</p> <p>9 now is, is it more dangerous than the flu? Is</p> <p>10 this going to be worse than the flu? Are people</p> <p>11 terrified of the flu? I have people calling me</p> <p>12 say -- telling me, Del, compared to the flu, show</p> <p>13 them how it's like. It's, like, you know, it's -</p> <p>14 - maybe it's the same the flu. I said, yeah, but</p> <p>15 people are terrified of the flu. I'm not. But</p> <p>16 people are.</p> <p>17 So I want to think of, like, how do we</p> <p>18 put this in perspective? Now, what we do know is</p> <p>19 the saying across the world right now give the,</p> <p>20 oh, you know, over 80,000 something cases -- that</p> <p>21 the death rate appears to be in the two to,</p> <p>22 maybe, three percent range. More like two</p> <p>23 percent outside of China.</p> <p>24 Now, that sounds, you know, I mean,</p> <p>25 they're saying -- I said last week, just stay at</p> <p style="text-align: right;">Page 13</p>

<p>1 home if you're ill. You'll be fine. Two percent  2 is not a big number. I think for a lot of  3 people, that's a big number. That's like two  4 people out of 100 that get it are going to die  5 and I want to talk about that.</p> <p>6 Because, you know, if it's two percent,  7 then, you know, how many is that? And how many  8 people are getting it? And how are we getting  9 that number? If -- I want you to look at this.  10 This is on the CDCs website right here.</p> <p>11 It says that 80 percent of COVID-19  12 patients of all ages have experienced mild  13 illnesses. Mild illness. Approximately 80  14 percent. So -- and by the way, this is a --  15 patients. These are people that came in, had a  16 really mild illness. I'll be honest. If you can  17 hear it right now, I have a little bit of nasal  18 congestion. There is a chance that I have COVID-  19 19 right now. Am I going to rush into a hospital  20 and say, you know, I have a stuffy nose?</p> <p>21 Because if there's mild symptoms, how  22 many people are going to report? Add to that, by  23 the way, if you even have, like, heavier symptoms  24 and, like, if for -- for instance -- by the way,  25 Kit Patrick, can I tell them? I mean, Patrick</p> <p style="text-align: right;">Page 14</p>	<p>1 There are probably millions and millions of  2 people right now -- or across the world -- even  3 though we're in the thousands of cases still that  4 potentially have COVID-19 and you'll never hear  5 about it.</p> <p>6 So, right there, I think we really have  7 got to, you know, step back and say, can we even  8 trust the two to three percent? What is that  9 reporting system?</p> <p>10 All right. I also want to show you  11 this graph because last week, I showed you that  12 it looks like the recovery rate is moving, you  13 know, it's coming up. And we have the last  14 several days here. Can we bring this up? I want  15 to show the last several days.</p> <p>16 Starting on the 24th, the recovery rate  17 is in the orange. Then, on the 25th, it's going  18 up. You can see -- you see it. It goes all the  19 way up. All the way, by the 4th of March now,  20 look at the recovery rate is now passing the  21 active cases.</p> <p>22 That's exactly what you want to be  23 seeing now that this thing is appearing, you  24 know, in different places around the world. I  25 have to imagine, now that we've got cases in the</p> <p style="text-align: right;">Page 16</p>
<p>1 was sick as a dog last week. He was out of --  2 town, he had to get back for the show and he's  3 about to hop on a plane and he called me and  4 said, Del, we're going to drive. We're going to  5 drive eight hours because they don't want to get  6 on a plane, get quarantine, and then find myself  7 unable to get on the show. Which is -- think  8 about that. Fire fighters, doctors, teachers,  9 people that have, you know, run their own  10 business. Are you going to rush in if you're  11 feeling really nasty? You, you know, you'll say,  12 look, I might take two or three days off from  13 work and weather myself through this, but I'm not  14 going to go to the hospital where I could  15 potentially get quarantined for the next, like,  16 14, 20 days. Whatever it is.</p> <p>17 So all of these reasons -- mild  18 symptoms -- no one is going to talk about it  19 because there is such a terror in this country  20 around having it and the possibility of getting  21 quarantined, there's many people that would be  22 really ill that won't go in and tell the hospital  23 or tell the CDC about it.</p> <p>24 So then, what is that two percent? The  25 two percent death rate is of those reporting.</p> <p style="text-align: right;">Page 15</p>	<p>1 United States of America, that it's going to --  2 it's going to, sort of, sweep across this  3 country.</p> <p>4 I think we've missed the point where  5 we really could have stopped it. We didn't  6 stop planes coming in from China and Japan in  7 time. And so now, this thing is popping up all  8 over the place. The question is should we be  9 losing our minds about it?</p> <p>10 Now, let's talk about the fact that,  11 you know, on top of everything else, who's going  12 to be diagnosed with it? I mean, there is an  13 article here that, you know, in US new -- 100,000  14 Americans die from air pollution every year.  15 People have all sorts of upper respiratory issues  16 from air pollution and, you know, what's going to  17 happen with them?</p> <p>18 Are we going to say that they had the  19 coronavirus? Or, potentially, are they just more  20 susceptible to the coronavirus? Is that who's in  21 the death rate? We're saying they're older  22 people, usually, and they weren't very healthy.  23 It doesn't seem to be affecting kids at all.</p> <p>24 But, you know, all of these people that  25 have -- that -- issues with pollution? You know?</p> <p style="text-align: right;">Page 17</p>

<p>1 Upper respiratory distress syndrome, which is all 2 over China. I mean, think about China. They're 3 so polluted you can't even imagine how many 4 people must die there every year just from upper 5 respiratory distress from the air. 6 See, all of these things weigh in when 7 we decide how terrified are we going to be of 8 this. And then, of course, let's talk about the 9 testing. Now, eventually, you're going to have 10 to start testing to figure out how many cases. 11 If you haven't been noticing, nobody can get any 12 test. The FDA, the CDC, everyone is fighting. 13 No one think the test works. Here's a couple of 14 headlines on that. 15 State labs report issues with 16 coronavirus test kit, CDC to send new reagents. 17 And then, it says, the Centers of Disease Control 18 and Prevention today said new reagents will be 19 manufactured and sent to state laboratories that 20 reported inconclusive results using the novel 21 coronavirus (COVID-19) test kit sent by the CDC. 22 They're trying to make a better test 23 kit, right? Let's just think about testing. 24 Let's show you -- let me just show you how the 25 numbers would work with that.</p> <p style="text-align: right;">Page 18</p>	<p>1 get sensationalized and hyped. 2 But that being said, if it is two 3 percent, I'm guessing, you're going to see some 4 deaths across America. You're going to see 5 deaths across Europe. It's going to happen. We 6 have deaths from the flu. Lots of them. Every 7 single year. You know, so, it happens. 8 We also have people that are on their 9 death bed as we speak right now. Odds are it 10 will be very hard to keep them from getting 11 COVID-19, so that's going to spike your death 12 rate up. So that's my thought on that. 13 Now, let's talk about treating it. So 14 we're rushing -- so, when we think about how 15 dangerous is it. Is it really two percent death 16 rate? Is it lower? Should we be rushing to a 17 vaccine? Obviously, I'm telling you we should 18 not be rushing at all. But is there any other 19 way to deal with it? Why do we always go to a 20 vaccine? 21 Did you notice that there was actually 22 Vitamin C trials going on in China as we speak? 23 Take a look at this. Here's an article that came 24 out in the Global Research. 25 China treating coronavirus COVID-19</p> <p style="text-align: right;">Page 20</p>
<p>1 Let's say that they come up with a test 2 that's 99 percent accurate. Only one percent of 3 the time does it have a false positive. That 4 would be a really, really accurate test by the 5 way, right? It would be great to have it at 99 6 percent. That's nowhere near that right now. 7 But if we had a 99 percent accurate test kit, and 8 let's say we just tested everyone in America -- 9 we got really, really paranoid in America and we 10 said, let's just test everybody -- 300 and 11 roughly 40 million Americans -- that means you 12 would have 34 million false positive cases from 13 that one percent. Thirty-four million false 14 positives. So, where's the test going to get us? 15 See, all of these things, we have got 16 to start wrapping our head around it and saying, 17 you know, how much hysteria is necessary? What 18 are the real numbers? And even from those real 19 numbers, who's actually reporting? 20 This is -- the things that, I think, 21 logical people, you've got to get out of the 22 insanity on this. You have to recognize -- I 23 know you're not a doctor. You're not a 24 scientist. But you did get through basic math 25 and you can understand how things can -- really</p> <p style="text-align: right;">Page 19</p>	<p>1 with intravenous vitamin C. He goes on to say in 2 this article -- this is OMNS Chinese edition 3 editor Dr. Richard Cheng is reporting from China 4 about the first approved study of 12,000 to 5 24,000 mega dose -- what is that? Milligrams a 6 day of vitamin C by IV. Dr. Cheng, who is a US 7 board-certified specialize -- specialist in anti- 8 aging medicine adds -- Vitamin C is very 9 promising for prevention, and especially 10 important to treat dying patients when there is 11 no better treatment. Over 2000 people have died 12 of the co -- COVID-19 outbreak, and yet, I have 13 not seen or heard large dose intravenous vitamin 14 C being used in any of the cases. The current 15 sole focus on vaccine and specific antiviral 16 drugs for epidemics is misplaced. 17 So, there's vitamin C studies going on. 18 We've been saying, take your vitamin C. I think 19 it's a good idea. You know people are being 20 blocked that post this. That say, look, vitamin 21 C is being used in China. It's looks like it's 22 going to be effective. So there you have it. 23 How many cases would we have if all the 24 people that were infected have been given the 25 high doses of vitamin C? We don't know what that</p> <p style="text-align: right;">Page 21</p>

<p>1 stat is.</p> <p>2 And I doubt you'll hear it because they</p> <p>3 never talk about it with the governments and</p> <p>4 they're in a meeting with Donald Trump. Nobody</p> <p>5 wants to bring it up. Can you imagine if vitamin</p> <p>6 C just cured this thing? Do you know how cheap</p> <p>7 that would be? I mean, think about it.</p> <p>8 The reason they want a vaccine is</p> <p>9 because a vaccine you give to billions of people</p> <p>10 around the world. We currently have tens of</p> <p>11 thousands of people with the issue. If you have</p> <p>12 a product that heals the tens of thousands,</p> <p>13 you're not going to make nearly as much money as</p> <p>14 a product that you give and sell to billions.</p> <p>15 I mean, you see how this works? That's</p> <p>16 why vaccines are so loved and cherished by the</p> <p>17 pharmaceutical industry.</p> <p>18 Now, for those of you out there saying,</p> <p>19 Del, vitamin C? Really? I mean, I get it. Many</p> <p>20 of you are still addicted to drugs no matter what</p> <p>21 I say. You still have to have all your drugs in</p> <p>22 your cabinet. You believe in it. I get it.</p> <p>23 I would say change your diet. Start</p> <p>24 working on some other things. But for you,</p> <p>25 there's actually also an answer. So maybe you</p> <p style="text-align: right;">Page 22</p>	<p>1 tested old molecules that are known and have been</p> <p>2 used in the past without showing toxic effects to</p> <p>3 see if they could use some to treat the</p> <p>4 coronavirus. They tested them for their new</p> <p>5 virus and found that just as it was found and</p> <p>6 forgotten for the SARS virus, Chloroquine is</p> <p>7 active in vitro had been interviewed by the</p> <p>8 Chinese television.</p> <p>9 I had been asked what advice I would</p> <p>10 give to the Chinese and what I was expecting from</p> <p>11 them as I think they have the best virologists</p> <p>12 teams in the world. I had told them; I hope that</p> <p>13 your researchers will be very fast to prove the</p> <p>14 efficacy of chloroquine on coronaviruses. And</p> <p>15 now, it's done. It's efficient on the</p> <p>16 coronavirus. 500 milligrams of chloroquine per</p> <p>17 day during ten days brings a spectacular</p> <p>18 improvement and is recommended for all clinical</p> <p>19 cases that tested positive for coronaviruses.</p> <p>20 It's an excellent news. Actually, from</p> <p>21 all -- listen to this -- actually, from all</p> <p>22 respiratory infections, it's probably the easiest</p> <p>23 to treat. So there is really no reason to get</p> <p>24 excited anymore. There is really no reason to go</p> <p>25 get excited and rush to produce a vaccine. One</p> <p style="text-align: right;">Page 24</p>
<p>1 think vitamin C is, you know, hocus pocus. Let's</p> <p>2 go ahead and talk about a drug. This is really</p> <p>3 super interesting.</p> <p>4 Here is a scientist out of France. His</p> <p>5 name is Didier Raoult, I think, is how you say</p> <p>6 it. He's a French biologist and infectious</p> <p>7 disease specialist. My understand is he has</p> <p>8 discovered personally over 60 different viruses -</p> <p>9 - brand new viruses around the world.</p> <p>10 In Europe, they compare this guy to</p> <p>11 Stanley Plotkin, who is our, you know, reigning</p> <p>12 godfather of the vaccine program here in America.</p> <p>13 He's made more vaccines than anyone alive. In</p> <p>14 fact, Dr. Stanley Plotkin quotes Didier Raoult</p> <p>15 all the time.</p> <p>16 Well, look it. He gave a speech last</p> <p>17 week. He came out and basically said, the</p> <p>18 coronavirus, it's time to party. This thing is</p> <p>19 over. Why? Look at what he said in this video.</p> <p>20 Well, here's a last-minute scoop of</p> <p>21 very important news. The Chinese, who are the</p> <p>22 fastest and who are very pragmatic, instead of</p> <p>23 looking to develop a new vaccine or a new</p> <p>24 molecule that could treat the coronavirus, they</p> <p>25 did what we call repositioning, meaning they</p> <p style="text-align: right;">Page 23</p>	<p>1 just needs to work and look at which licensed</p> <p>2 molecules are potentially active and can be of</p> <p>3 immediate use. Now at this stage, of course,</p> <p>4 there soon could be a rush for chloroquine in</p> <p>5 pharmacies.</p> <p>6 Let's just pull up the basic -- what he</p> <p>7 says here. I think these are the important</p> <p>8 lines. He says, actually, from all respiratory</p> <p>9 infections, it's probably the easiest to treat.</p> <p>10 This guy would know. He's one of the top disease</p> <p>11 specialists in the world. So, there is really no</p> <p>12 reason to get excited anymore. There is really</p> <p>13 no reason to get excited and to rush to produce a</p> <p>14 vaccine.</p> <p>15 Well, there you have it. That's The</p> <p>16 Highwire bringing you the actual news about</p> <p>17 coronavirus this week. I'm not sure -- I don't</p> <p>18 watch MSNBC all the time, or FOX, or CNN, or MBC,</p> <p>19 ABC, but you should probably be asking yourself,</p> <p>20 why aren't they mentioning vitamin C if they're</p> <p>21 having success in China. And even more</p> <p>22 importantly, since we know that it's being driven</p> <p>23 by the drug industry here in America, why aren't</p> <p>24 we talking about chloroquine?</p> <p>25 For those of you that don't understand</p> <p style="text-align: right;">Page 25</p>

<p>1 what chloroquine is, let me make this make sense.  2 This is an anti-malaria drug that is used in, you  3 know, very successfully to treat malaria. And,  4 in fact, as he pointed out in his discussion,  5 after SARS, they used it have great effect  6 against SARS, which was a coronavirus. And now  7 he said to the Chinese government that reached  8 out to him because he's one of the best  9 specialists in the world, what should we do? He  10 said try chloroquine. And they ended up trying  11 it, and it works. So much so, he says it looks  12 like this is an easy upper respiratory illness to  13 cure. Maybe the easiest.</p> <p>14 So there you have it. There's the news  15 as we're reporting it. That's what I think you  16 should know. I mean, whether or not you want to  17 take that drug. I would think about looking --  18 if it cures malaria, then think about other  19 things that cure malaria. I'm not going to go  20 much further than that, but some of you out there  21 are smart enough to know what I mean.</p> <p>22 There's products out there that will  23 get me in trouble if I even mention them. But  24 I've been hearing that those work on coronavirus  25 too. So do your research. Either way, should</p> <p style="text-align: right;">Page 26</p>	<p>1 of Health. Our win against the FDA. Our win  2 against the nation, I mean, against Health and  3 Human Services. All of those. And I said, but  4 bigger things are coming and we're getting into  5 bigger and bigger cases. And I told you that we  6 needed \$100,000 to be raised if I was on Monday  7 going to be able to say to our legal team, headed  8 by Aaron Siri, keep going. The people are behind  9 us.</p> <p>10 Well, I want to report to you that we  11 made our goal. You did it. You stepped up. You  12 got us through the weekend. And we are rocking  13 and pushing forward into this week, and this  14 month, and this year. There is a lot more to do.  15 It is only the beginning and the finances will  16 have to keep working through it. But you stepped  17 up. You made a difference. And I want you to  18 know how good that should make you feel.</p> <p>19 I also think there was a huge energy  20 shift because of that. Because there is a case  21 that we'd been trying to work out with the CDC  22 now for many, many months. It was getting very  23 contentious over the last few weeks. And then,  24 last Thursday, when I said please support us in  25 our work. We are the most successful nonprofit</p> <p style="text-align: right;">Page 28</p>
<p>1 you be hysterical? I don't think so. Should we  2 be worried about it? I don't think we should be  3 more worried than we are with the flu or anything  4 else. Perhaps it's a good idea to not be  5 touching each other's faces or licking our  6 fingers in between, you know, moments where we're  7 talking or writing or reading. But in the end, I  8 think we're going to watch this thing be a bit of  9 a nonevent which is going to make you wonder why  10 Gates is sensationalizing it.</p> <p>11 Why is the CDC or the WHO -- when these  12 people sensationalize these things, does it turn  13 into the boy who cried wolf? At some point, are  14 we going to say, you know what? I just don't buy  15 it anymore. You keep screaming about the end of  16 the world. And no matter how excited I get about  17 it, it just doesn't come.</p> <p>18 That's what's happening. And that's  19 the news. And we're the ones bringing you the  20 news. Last week, I made a pretty strong pitch  21 about how much we need your help. I told you  22 last week that we needed to raise money in order  23 to continue with our legal efforts.</p> <p>24 We went through many of those legal  25 efforts. Our win against the National Institute</p> <p style="text-align: right;">Page 27</p>	<p>1 that has ever begun suing around vaccines.  2 Before we came on board, everyone said  3 you couldn't sue. There's nothing you can do.  4 It's impenetrable. But then, we found a way and  5 we have been achieving.</p> <p>6 Well, Thursday, you all stepped up.  7 Friday, you started helping us. And many of you  8 were signing up to our \$20 for 2020 so that you  9 can be a part of a recurring donation that makes  10 a difference in this world. Well, I don't know  11 if it's just energetic. I don't know if somehow,  12 cosmically, we shifted the energy in time and  13 space, but on Friday, we finally got the  14 signatures from the CDC. And we have just  15 settled and won another case.</p> <p>16 I'm going to talk about this case, but  17 first, I want to talk about autism. I want to  18 talk about the fact that we keep hearing that  19 there are -- there's no proof that vaccines cause  20 autism. Tons and tons of studies have been done  21 ad nauseam. It sounds something like this on  22 every television in the world.</p> <p>23 (VIDEO)</p> <p>24 SUZY SCHERF: Vaccines have nothing to  25 do with autism.</p> <p style="text-align: right;">Page 29</p>

<p>1 ALEX AZAR: Vaccines do not cause 2 autism.</p> <p>3 PETER HOTEZ: Vaccines don't cause 4 autism. The science is clear.</p> <p>5 MAN 1: We have thoroughly debunked any 6 association between autism and these vaccines.</p> <p>7 MAN 2: It has been looked at 8 exhaustively.</p> <p>9 PETER HOTEZ: Massive evidence says 10 that there's no link between vaccines and autism.</p> <p>11 MAN 3: To believe the science, it 12 clearly has exonerated vaccines.</p> <p>13 MAN 4: Robert, it is nearly consensus 14 in the scientific community that there's no link 15 there.</p> <p>16 SANJAY GUPTA: We're not sure in the 17 scientific community what causes autism, but we 18 know that vaccines do not.</p> <p>19 SOPHIA JAN: There have been hundreds 20 and hundreds and hundreds of thousands of 21 children that have been looked at and studied to 22 meet -- to see whether or not that risk exists. 23 And there really is -- has been shown no link.</p> <p>24 MAN 5: A mountain of scientific 25 evidence which has already taught us that the</p> <p style="text-align: right;">Page 30</p>	<p>1 thing have looked at that's causing autism.</p> <p>2 WOMAN 1: The Institutes of Medicine, 3 the Center for Disease Control have repeatedly 4 investigate these. Vaccines do not cause autism.</p> <p>5 MAN 9: Ranging in the numbers of 6 millions of children that they've actually looked 7 at. When you combine all the studies together.</p> <p>8 MAN 10: Hundreds of thousands of 9 children --</p> <p>10 PETER HOTEZ: Studies in over one 11 million children, that there's no link between 12 vaccines and autism.</p> <p>13 MAN 11: The misinformation that 14 vaccines cause autism, we've had so many robust 15 studies debunking that.</p> <p>16 SCOTT GOTTLIEB: The science around a 17 purported link between these vaccines and autism 18 was thoroughly debunked years ago. And there's 19 been many subsequent studies of equal magnitude.</p> <p>20 ALISON SINGER: There comes a point 21 where there's so much evidence. None of which 22 shows any link between vaccines and autism that 23 you have to say, enough.</p> <p>24 MAN 12: Yeah, that's right.</p> <p>25 SCOTT GOTTLIEB: So, we don't need more</p> <p style="text-align: right;">Page 32</p>
<p>1 combination of measles, mumps, rubella, or MMR 2 vaccine, doesn't cause autism. Thimerosal, an 3 ethylmercury containing preservative that was in 4 a number of vaccines, doesn't cause autism. And 5 it -- most recently, the too many vaccines given 6 too soon, if you will, doesn't also cause autism. 7 So we know that the schedule is safe.</p> <p>8 MAN 6: Because I am a doctor, because 9 I've been trained in immunology, and I'm trained 10 in the scientific method, I could go through it 11 and sort through the garbage and get to the 12 truth. And some of it is going to make sure I 13 know credible sources, understanding the 14 methodology, and I was able to answer the 15 question which is, nope, they've show it's not 16 the case.</p> <p>17 ANDERSON COOPER: Are there peer 18 reviewed scientific reports that indicate a link 19 between vaccines --</p> <p>20 MAN 7: No.</p> <p>21 ANDERSON COOPER: -- and autism?</p> <p>22 MAN 7: No. And not only is there not 23 peer reviewed work, this is probably the most 24 studied public health issue involving children.</p> <p>25 MAN 8: Vaccines are really the one</p> <p style="text-align: right;">Page 31</p>	<p>1 research. At some point, enough is enough. It's 2 fine to continue to collect data, but at some 3 point, you have to take no for an answer.</p> <p>4 (END OF VIDEO)</p> <p>5 DEL BIGTREE: If you're one of those 6 people that watch our show that watched your 7 child regress into autism after a vaccination, or 8 probably watched them get very sick after a first 9 round of vaccines, asked your doctor about it and 10 they said, it's just a coincidence. That's 11 normal. And so, you did it again, and they got 12 worse. And maybe you did the whole schedule. 13 Each time, they got worse until you lost them 14 completely.</p> <p>15 I can't imagine how difficult it is to 16 watch those people say those things on 17 television. I want to say this. That, you know, 18 over the last year especially, there's been a lot 19 of people that pull me aside because I travel all 20 over the country and, you know, I speak before 21 panels -- senate panels and congressional panels. 22 And they'll say to me, Del, drop autism. Like, 23 let go of autism. Because, you know, we have so 24 much science now -- the aluminum science and all 25 these other issues on autoimmune disease. You</p> <p style="text-align: right;">Page 33</p>

<p>1 know, we know we got asthma. We that, you know,  2 all the Crohn's disease and multiple sclerosis --  3 there's so many things you can talk about now.  4 And they basically just made this autism a bad  5 buzzword. And it's getting in our way.  6 Well, I want to let you know that I can  7 see people that probably don't have autistic  8 children at home thinking that. They've dealt  9 with asthma or they have the other issues. But  10 I'm not like anyone else. I'm one of the few  11 people -- me, Polly Tommey, maybe Andy Wakefield  12 -- a few others that have been in the homes of  13 thousands of people with autism. Or if not in  14 their homes, having them share their stories with  15 us in front of cameras.  16 I've travelled the country and parts of  17 the world to hear these stories everywhere I go.  18 I've seen how difficult this life is. I can only  19 imagine how tragic it must be to lose a perfectly  20 healthy child that on one day was saying I love  21 you, Mommy. I love you, Daddy. And then, you  22 went to your doctor, they inject them with a  23 vaccine, you were doing what you were told to do.  24 You were doing what you thought you had done as a  25 child. You weren't aware that the vaccine</p> <p style="text-align: right;">Page 34</p>	<p>1 avoid doing the proper science. But this is what  2 they say. By six months, you can see few or no  3 big smiles or other warm, joyful, and engaging  4 expressions. Limited or no eye contact. And  5 then they go on to nine months, but these are the  6 milestones we can see.  7 So it's clear that autism -- we're now  8 recognizing, may not just start at 18 months.  9 It, perhaps, as all those vaccines early -- all  10 of those well baby visits -- two months, four  11 months, six months. So, because of this, and,  12 you know, we decided -- well, what's in those  13 vaccines? And in -- specifically, if you go --  14 now remember, if you go in for your well baby  15 visit for those first six months, you're going to  16 be told, you know, you're going to be handed a  17 VIS sheet. And on the VIS sheet it says, you  18 know, there are going to be some sensitivity  19 around the site. There might be a little bit of  20 a fever. There could be some crankiness, but  21 that's about it. Vaccines have been proven to be  22 extremely safe. And if you have any more  23 questions -- it kind of says in the bottom of the  24 sheet -- if you have any more questions, then  25 just go to our website, the CDC.</p> <p style="text-align: right;">Page 36</p>
<p>1 program had exploded from 11 vaccines to 54,  2 perhaps. But then, your child was never the same  3 again. Some of them self-injuring. Beating on  4 themselves. Hurting themselves. You're trying  5 to protect them from themselves.  6 I want you to know that I will never  7 stop talking about autism. I will never stop  8 talking about an issue that has gone from 1 in  9 10,000 to, essentially, now 1 in 36 based on  10 polls from the CDC.  11 This thing potentially could end our  12 species. And it certainly is going to make it so  13 expensive that we cannot move forward with  14 anything else we want to do in this world. And  15 so, that's why the Informed Consent Action  16 Network did not leave autism alone. Instead, we  17 sued.  18 Let me explain how this lawsuit works.  19 Now, we are hearing more and more that you can,  20 you know, diagnose -- we can start seeing the  21 signs of autism within the first six months. In  22 fact, this is right from autism speaks -- a group  23 that refuses to accept that vaccines could be a  24 part of this. They, by the way, raised millions  25 -- tens of millions of dollars every year to</p> <p style="text-align: right;">Page 35</p>	<p>1 Well, if you go there, this is what it  2 says. This is the bottom of that VIS sheet,  3 right? Then, you go to the website and what do  4 you see when you're on that website? You see  5 this page. It says vaccines do not cause autism.  6 There is no link between vaccines and autism.  7 This is really important for them to tell you.  8 Vaccines do not cause autism.  9 Now, I've talked about this a lot  10 before. And many of you probably know exactly  11 where I'm going. But this is why the work we're  12 doing at ICAN is so important. It's one thing to  13 say it. It's one thing to point out the  14 discrepancies. And it's a whole other thing to  15 get a court ordered stipulation with the sides  16 representing the CDC, the sides were representing  17 ICAN, and a judge signing on to it.  18 So, what did they sign on to? Here's  19 what we did. We said, okay, if you're so  20 confident that vaccines don't cause autism, and  21 all of you are getting on the television to say,  22 oh, there's what -- listen to these -- we've  23 exhaustively researched it. Most -- this is the  24 most studied public health issue there is.  25 Millions of children have been investigated.</p> <p style="text-align: right;">Page 37</p>

<p>1 This is the one thing we have investigated when 2 it comes to autism -- is vaccines. We need to 3 take our money away from that investigation and 4 look at other possibilities. We have thoroughly 5 debunked the question of whether or not vaccines 6 cause autism. We've debunked it.</p> <p>7 Really? Okay. Great. So here's what 8 we said, since it appears that we're giving these 9 childhood vaccines, the first six vaccines being 10 Hepatitis B, Hib, Prevnar, DTaP, and polio. We 11 give it over and over and over again in multiple 12 doses. Over the first six months. And since you 13 said you have done studies in all vaccines -- 14 there it is. There's the -- you can see right 15 there in the first six months. We've got -- I 16 think it's at least 15 doses of vaccines we're 17 giving our children, okay?</p> <p>18 So, we said, great. We would like -- 19 we put forward a request -- first of all, in a 20 FOIA request -- we would simply just like to see 21 the studies that show that vaccines don't cause 22 autism. Let's be more specific. We said, we'd 23 like to see all studies relied upon by CDC to 24 claim that the DTaP vaccine does not cause 25 autism. All studies relied upon by the CDC to</p> <p style="text-align: right;">Page 38</p>	<p>1 chase. We're tired of being run around.</p> <p>2 Now, we want you to provide us with 3 this supposed mountain of evidence that you have 4 that these vaccines we're giving our children in 5 the first six months do not cause autism as you 6 say.</p> <p>7 Well, guess what? They didn't want to 8 do it. This has actually been the case for all 9 of our lawsuits. They just start out as FOIA 10 requests, but the CDC doesn't want to adhere to 11 the law. They don't want to provide the studies, 12 which makes you start wondering why? Why don't 13 they want to provide those studies?</p> <p>14 Well, we took them to Federal Court. 15 And on Friday, as I said, we won the case. They 16 are not allowed to avoid telling us what studies, 17 in fact, they decided instead -- or they had to 18 give us the list. So, here it is, folks. Here 19 is what it looks like in the document. They gave 20 us the list. It's actually 20 studies. Twenty 21 total studies make up the entire list of what 22 they look to when they say that these childhood 23 vaccines -- the five and the cumulative effects 24 of them given in the first six months of life. 25 Twenty studies is why we're confident to say they</p> <p style="text-align: right;">Page 40</p>
<p>1 claim that neither Engerix-B or Recombivax HB do 2 not cause autism. All studies relied upon by the 3 CDC to claim that Prevnar 13 does not cause 4 autism. All studies relied upon by the CDC to 5 claim that Hib vaccines do not cause autism. All 6 studies relied upon by the CDC to claim that 7 inactivated polio vaccine (IPV) does not cause 8 autism. And then, we'd like copies of the 9 studies the CDC relies upon to claim that the 10 cumulative exposure of vaccines it recommends 11 that babies be administered during the first six 12 months of life do not cause autism.</p> <p>13 I mean, jeez, you've got 14 (indiscernible) the same. We've got miles -- you 15 have mountains and mountains of these studies. 16 They're everywhere. We've exhaustively looked at 17 it. This should have been easy. But guess what? 18 They didn't really respond for a while.</p> <p>19 We pressed them. And then, they gave 20 us a wink to their website. We said, no, no, no, 21 no. You're not going to get away with that. 22 This is a FOIA request. This is a request for 23 documents. You're not going to tell us what you 24 think or your opinion and send us on some wild 25 goose chase. We're tired of that wild goose</p> <p style="text-align: right;">Page 39</p>	<p>1 don't cause autism.</p> <p>2 Now remember, they said mountains. But 3 this is what they gave us. These are 20 Jenga 4 pieces. This is not a mountain. This is a 5 molehill. This is an embarrassment. I don't 6 know how all those pundits are on T.V. screaming 7 and yelling about the amount of studies being 8 done. But when we finally ask for them, they 9 came back with 20.</p> <p>10 Remember, they could have given us 11 every study in the world that made their point. 12 This is all they actually had when they did their 13 search. So, how about we do this to those 14 studies. Let me take you through this little 15 bit. Let's go to the big screen here.</p> <p>16 Twenty studies. Here they are. Here 17 are the 20 studies they provided. Now, remember, 18 we're asking on -- I'm looking there. Sorry. 19 We're asking questions about DTaP, Hib, HepB, 20 Prevnar, and polio. Okay?</p> <p>21 So, we should be seeing studies, I'm 22 assuming on DTaP, Hib, HepB, Prevnar, and polio, 23 right? Wrong.</p> <p>24 Here's what we have in these 20 25 studies. The first one, that's an MMR study.</p> <p style="text-align: right;">Page 41</p>

<p>1 Okay? The second one, an MMR and a DTaP study.  2 The next ones, MMR -- these four are MMR and  3 thimerosal studies. For those of you who don't  4 know what thimerosal is, that's the mercury  5 containing preservative that used to be in  6 vaccines. A lot of parents thought that caused  7 their child's autism. Well, they eventually took  8 that out of all the childhood vaccines -- at  9 least they say they did.  10 I know some of you out there will say,  11 Del, they still rinse it and they clean the  12 vaccines with thimerosal. There's a trace  13 amount. But let's just say, for the most part,  14 thimerosal has been taken out of your childhood  15 vaccines, except for the flu shot, by the way.  16 Multidose flu shots still have mercury in them.  17 But, again, we have MMR and thimerosal  18 studies. And then, the next, all the way through  19 to 20 -- so, one, two, three, four, five, six --  20 from seven to 20 are all just thimerosal studies.  21 And lastly, we have one antigen study. Okay?  22 Now, let me be clear. I'm saying  23 studies and I could be corrected by some of the  24 pundits out there. So, let's be really clear.  25 These aren't even 20 studies. There are also</p> <p style="text-align: right;">Page 42</p>	<p>1 do vaccines. The antigen study worked like this.  2 Essentially, they took children who got a bunch  3 of vaccines and compared them to other children  4 who got a lot of vaccines too. But they tried to  5 see -- did the antigen levels, you know, raise or  6 lower the amount of autism.  7 Now, really, when you read this antigen  8 study, that -- what you come to as a conclusion  9 yourself is, really, it was kind of a look at the  10 DTP vaccine. There is increasing exposure to  11 antibody-stimulating proteins and polysaccharides  12 in vaccines is not associated with risk of  13 autism. Frank DeStefano, who is also the lead on  14 the famous CDC study.  15 Oh, by the way -- wait, wait, wait. I  16 had to -- can we go back here really quick? I  17 missed -- I missed a beat and this is really,  18 really important. Here we go. Can we bring the  19 -- back up? Can we see all the studies? Bring  20 me back to 20. Because I think this is awesome.  21 I'm driving my team nuts right now. I told you I  22 would.  23 Okay. So -- and how many -- bring up  24 where it says the MMR -- how many are MMR  25 studies. You're going to love this. So, of all</p> <p style="text-align: right;">Page 44</p>
<p>1 reviews. Of the 20 studies, I believe it's the  2 second, third, fourth, and sixth of these studies  3 are reviews of other studies. Reviews  4 essentially of what MMR and thimerosal studies.  5 Okay?  6 Now, let's go back to the big list. We  7 bring back the 20. The list of 20 -- here we go.  8 All right. So, now, when we're looking at all  9 20, we know that, you know, a handful of these  10 are reviews. But how many of these would  11 actually answer the question to DTaP, Hib, HepB,  12 Prevenar, polio? Well, I'm going to be really  13 honest with you here. Obviously, they've totally  14 missed the boat. But if there was any chance  15 they're going to give us some answers, they do  16 mention the DTaP vaccine in this review -- in  17 number 2, and in number 20 down here, when we  18 talk about the antigen study.  19 So why don't we talk about the antigen  20 study. Let's just see -- is there any potential  21 that this gave them the answer to say that  22 vaccines do not cause autism. Let's take it back  23 here and get to my computer.  24 So, essentially, the antigen study was  25 a study we've seen many times before in how they</p> <p style="text-align: right;">Page 43</p>	<p>1 these 20 studies, right? This is what they  2 provided for us. And we've got -- this one is an  3 MMR. And then one is an MMR in DTaP, and then  4 the rest are -- then you have MMR in thimerosal.  5 Okay?  6 So, this group right here -- all of  7 these right here. All of these studies -- you  8 know what study is not in here? This is what I  9 want to say. You know what study is not in here?  10 It's Frank DeStefano's or Dr. William Thompson's  11 study, the 2004 Autism study on MMR that is the  12 central point of the film Vaxxed which got me  13 into this whole mess to begin with. They don't  14 even have it in here.  15 Obviously, we've done so much damage  16 with Vaxxed, they said screw it. Don't even put  17 it in there. I'm pretty sure they know I'm  18 behind this request at ICAN, so they just said  19 forget it. We're not even going to stand by the  20 Frank DeStefano autism MMR study which is  21 incredible. Sorry. I mean I'm -- it may be a  22 little anticlimactic to go back, but I had to do  23 it. I had to do it. You've got to claim some  24 victory there.  25 You put out a documentary -- the was</p> <p style="text-align: right;">Page 45</p>

<p>1 the seminal study. That was the one they said  2 this one definitively proves that the MMR doesn't  3 cause autism. And now, they don't even put it in  4 the list. I hope you're hearing that Dr. William  5 Thompson, if you're out there watching. They  6 don't even consider that study worth mentioning  7 anymore.</p> <p>8 Okay. Let's get back to this antigen  9 study. So, essentially, what -- when you look at  10 the study, you have to remember that the DTP  11 vaccine -- that's the older version of the DTaP  12 vaccine. The diphtheria, tetanus, and pertussis.  13 That had over 3000 antigens in it.</p> <p>14 To give you some perspective, your  15 average vaccines right now have, you know, five,  16 at most, 10 antigens. And so, what they really  17 did, was sort of compare groups of children that  18 got all the vaccines with the DTaP vaccine, and  19 then groups of children that got all their  20 vaccines, plus the DTP vaccine. And their  21 conclusion was whether kids got thousands of  22 antigens or just hundreds of antigens -- there  23 was no difference in the amount of autism that  24 they had. Therefore, antigens do not cause  25 autism.</p> <p style="text-align: right;">Page 46</p>	<p>1 to antigens from vaccines during infancy and the  2 development of ASD with regression.</p> <p>3 So, he admits it right there. All we  4 can tell you is whether you get thousands of  5 antigens or hundreds of antigens, there appears  6 to be no difference. It is a totally useless  7 study. It happens to be where Sanjay Gupta goes  8 when he says there's less antigens than ever  9 before. Vaccines are, therefore, safer.</p> <p>10 No, you can't even make that statement  11 because you just proved the antigens are the  12 problem. In fact, no one in the movement -- no  13 one that is skeptical of vaccines has really ever  14 been complaining about the amount of antigens.  15 It's always about the adjuvant. It's always  16 about the amount of vaccines and all of the other  17 toxic chemicals. So, we can wipe that one off.</p> <p>18 Number 20 is off the list. Okay? It  19 did not address DTaP, polio, HepB, Hib, Prevnar  20 13. It does not answer the question, therefore,  21 that study cannot be used to say that vaccines do  22 not cause autism.</p> <p>23 So we're left with one last study. Can  24 we bring it back up. Let me point to which one  25 so we know which one we're talking about. I</p> <p style="text-align: right;">Page 48</p>
<p>1 Now, I'd like to chalk this up to my  2 Jack Daniels does not intoxicate you argument.  3 Here's how I do the study. We looked at 10, you  4 know, we looked at people that got 10 shots of  5 vodka, and then we looked at people that got 10  6 shots of vodka, plus a shot of Jack Daniels.</p> <p>7 And when we compared them, both groups  8 staggered. Both have difficulty driving. And  9 most had the same amount of percentage of slurred  10 words. Therefore, since Jack Daniels made no  11 difference to the equation, Jack Daniels does not  12 cause intoxication. You see how that works?</p> <p>13 Bunch of antigens. More antigen. But  14 lots of antigens, lots of vaccines. See, it  15 doesn't cause autism. Now, you may be saying,  16 Del, that's really oversimplifying it. But the  17 truth is, you should look at their own  18 conclusion. This is DeStefano's own conclusion  19 in his own study. Can we take a look at this?</p> <p>20 Here it is. I can't -- it can be  21 argued that ASD with regression, in which  22 children usually, lose developmental skills  23 during the second year of life, could be related  24 to exposures in infancy, including vaccines;  25 however, we found no association between exposure</p> <p style="text-align: right;">Page 47</p>	<p>1 didn't tell my team I was going to do this to  2 them. We bring it up -- bring me the 20  3 different cases. Here we go. There we go.</p> <p>4 So, of those, I told you there were  5 reviews. There's one review. It's this one.  6 Number two when they submitted to us their list.  7 This is number two on the list. Adverse Effects  8 of Vaccines -- Evidence and Causality. Okay?</p> <p>9 So, number two, here it is. This was  10 the Institute of Medicine's review of the  11 dangers, you know, the connection of vaccines and  12 issues. I have shown you this before, but for  13 those of you that are brand new, remember, this  14 is the only other study that can possibly address  15 -- because it's the only one that even uses the  16 word DTaP in it. We had the antigen study,  17 that's useless. Now let's look at this review by  18 the Institute of Medicine.</p> <p>19 Here's what they conclude when asked to  20 look at do vaccine -- does the DTaP or any form  21 of a pertussis containing vaccine and tetanus  22 toxoids and diphtheria cause autism. Here's what  23 the Institute of Medicine said. This is 2012.  24 The edit -- evidence is inadequate to accept or  25 reject a causal relationship between diphtheria</p> <p style="text-align: right;">Page 49</p>

<p>1 toxoid-, tetanus toxoid-, or acellular pertussis- 2 containing vaccines and autism. 3       There it is. It is inadequate. 4 Meaning -- and essentially, if you read this 5 entire study that they provided to us -- this is 6 our proof when it looked at the only vaccine on 7 our list, DTaP, and said, we could find no 8 studies in the world that showed that DTaP does 9 not cause autism. 10       So they just made our point. We asked 11 for the studies that you have that prove that 12 DTaP doesn't cause autism and you gave us the 13 study by the Institute of Medicine where -- a 14 review that looked at all the studies around the 15 world and said, we can't find any studies at all. 16       You know what's even crazier about the 17 whole thing? Let's pull up what they did find. 18 In this article, they say this at the very top of 19 that same page. The committee reviewed one study 20 to evaluate the risk of autism -- by the way, the 21 only study we could find -- after the 22 administration of a DTaP vaccine. This one study 23 -- the Geier and Geier from 2004 -- was not 24 considered in the weight of epidemiologic 25 evidence because it provided data from a passive</p> <p style="text-align: right;">Page 50</p>	<p>1       Forget that they don't even address the 2 vaccines we asked about. They never even did 3 those studies correctly. So we want to go and 4 talk about thimerosal and MMR, that's where I'd 5 start. The Institute of Medicine says you need 6 an unvaccinated control and you've never ever 7 used one. 8       So there you have it. We've heard 9 about mountains and mountains of studies and tons 10 and tons and millions of children by every single 11 news pundit in the world. But they're lying. 12 Why are they lying or why they got it wrong? 13 Because when we asked what studies show us that 14 DTaP, HepB, polio, Prevnar 13, and Hib -- show us 15 the studies that say that those don't cause 16 autism. They could not provide a single one. 17       Not one. Isn't that shocking? Isn't 18 that shocking when you see the amount of times 19 this is discussed on every other news station in 20 the world? Isn't it shocking we could only find 21 this out by suing? 22       Now, I know that -- I've seen guys like 23 Dr. Pete Hotez out there that's currently, you 24 know, he's gambling in trying to get a hold of 25 the billions of dollars being presented by the</p> <p style="text-align: right;">Page 52</p>
<p>1 surveillance system and lacked an unvaccinated 2 comparison population. 3       Okay. So there you have it. They 4 found one study that actually showed a causal 5 relationship, but instead, they did not consider 6 it in the weight of epidemiological studies 7 because it didn't have an unvaccinated comparison 8 group. 9       Can we bring up the 20 again behind me. 10 Driving you guys crazy. Think about this point - 11 - the only study that showed that, you know, that 12 there was a connection, they said we don't trust 13 it because it comes from VAERS, their own, you 14 know, reporting system. And it doesn't have an 15 unvaccinated control. 16       By the way, folks, look at this. These 17 20 right here, not one -- not one of these 20 18 studies -- not one of them has an unvaccinated 19 control group. So, if we're to read into what 20 the Institute of Medicine says, that in order to 21 have a decent study that makes it to the level of 22 epidemiological evidence and is well powered, you 23 have to have an unvaccinated control. Yet they 24 never ever used one in any of the studies they 25 provided us.</p> <p style="text-align: right;">Page 51</p>	<p>1 government saying, I can make a coronavirus 2 vaccine. But despite that, he has said they keep 3 playing whack a mole. This is going to be the 4 argument. Let's talk about some of the arguments 5 they're going to make against us, right. 6       They're going to say, well, I mean -- 7 that doesn't say anything. Just because the CDC 8 couldn't provide a single study, it doesn't mean 9 a thing. I mean, look it -- those 20 studies -- 10 and, by the way, the CDC said these are the 20 11 studies we reference for the entire vaccine 12 program, okay? 13       These 20 studies is what we reference 14 for all of the vaccines, even though none of them 15 show the comparative effects or, you know, the 16 vaccines in total. They'll say, well, but I 17 mean, you know, there were 20 studies. But think 18 about this. They're using MMR studies to say 19 that Prevnar 13 is safe. 20       I mean, that's like saying, you know, 21 look, we have studies that show that aspirin is 22 safe. So, therefore, oxycontin is safe. We 23 don't even have to do the study. Just put it in 24 the market. In fact, mix it with any other drug 25 you want. It's safe.</p> <p style="text-align: right;">Page 53</p>

<p>1 You know, they're going to take a total 2 non-competitor because thimerosal, a mercury 3 ingredient, which is in none of the vaccines we 4 asked about. We said mercury is safe. God know 5 how they did those studies, but that's a whole 6 other story. 7 Therefore, Hib is safe, DTaP is safe. 8 Come on. This is just like the worst science 9 known to man. But I know you're going to say it. 10 They're going to say you're playing whack a mole. 11 It used to be the MMR. I guarantee 12 you, this is what the headline's going to say. 13 We'll first they said MMR. Then we disprove MMR, 14 now they're moving on DTaP (indiscernible) that 15 whole argument, right? Well, it's not whack-a- 16 mole, Peter. It's not whack-a-mole. It's, you 17 know, it's actually been here a very long time. 18 This has been a major question -- the Diphtheria, 19 tetanus and pertussis vaccines. Specifically 20 pertussis containing vaccines for a very long 21 time. 22 Can we bring up the 1986 Act please. 23 Look at this. This is when we passed the law. 24 Congress was concerned. This is the National 25 Childhood Vaccine Injury Act. This is when we</p> <p style="text-align: right;">Page 54</p>	<p>1 know, different, you know, television hosts or 2 doctors, you know, say to me, well, I mean, there 3 is no evidence that vaccines cause autism. 4 What? No evidence? Remember, in a 5 court of law, an eyewitness is like the best 6 evidence you can get. It's right up there. You 7 have an eyewitness; you've got some really good 8 evidence. 9 And we have hundreds of thousands, if 10 not millions, of eyewitness testimony to the 11 destruction of their child -- regression into 12 autism right after DTaP vaccines. So that's 13 evidence. 14 What you're going to need is some damn 15 evidence to prove that these eyewitness -- the 16 evidence -- the outstanding evidence around the 17 world is incorrect. You need to disprove that. 18 And today, officially, as I announce to 19 you, they have been unable to do it. But 20 remember, they were asked, look at DTP vaccine. 21 Look at every vaccine with pertussis because so 22 many parents are claiming they have evidence this 23 caused their child's autism. 24 Did they do a study? Well, in 1990 -- 25 what? What year was it? In '91, the Institute</p> <p style="text-align: right;">Page 56</p>
<p>1 took all liability away. It says the Secretary 2 of Health and Human Services shall complete a 3 review of all relevant medical and scientific 4 information on the nature, circumstances, and 5 extent of the relationship, if any, between 6 vaccines containing pertussis -- including whole 7 cell extracts and specific antigens -- and the 8 following illnesses and conditions: autism. 9 They were supposed to study it. Now, 10 why is that in there? Why is that in there all 11 the way back in 1986? Why would the congress be 12 asking look into this? Because so many parents 13 were reporting that DTP -- it was the last 14 vaccine they got before their child regressed 15 into autism. 16 And I have told you time and time again 17 as I travelled the country with Vaxxed. That 18 more parents came up to me and said that the DTaP 19 vaccine caused their child's autism, than those 20 that had said that the MMR did it. It was 21 shocking to hear it. My film was all about MMR. 22 But the DTaP has more people claiming it caused 23 their child's autism. 24 So this is a major, major problem. And 25 when I hear about pundits that say to me, you</p> <p style="text-align: right;">Page 55</p>	<p>1 of Medicine reviews it. Looks for it. Looks all 2 around the world. Asks the CDC. Did you do a 3 study? None exists. CDC doesn't care. Doesn't 4 care that congress was concerned. No study 5 exists. 6 And then again, in 2012, it's been 7 submitted to us. They do the study again. Never 8 ever did the study. Never. There is no evidence 9 that the DTaP does not cause autism. There's 10 evidence that it does, but we threw that out 11 because we want an unvaccinated control group. 12 Something that everyone in the medical 13 establishment has refused to do. 14 There it is. You cannot say vaccines 15 do not cause autism. You certainly can't say 16 that there's mountains of evidence. You cannot 17 say that this has been thoroughly debunked 18 because today, what we have thoroughly debunked 19 is this lie being spoken by every news agency, 20 every CDC leader, every WHO leader, every single 21 health professional that utters the words -- they 22 are the ones that are being debunked today by the 23 Informed Consent Action Network. 24 Can we bring this up, please. I want 25 to make an appeal right now to Alex Azar, head of</p> <p style="text-align: right;">Page 57</p>

<p>1 Health and Human Services, heads of the CDC, 2 heads of the WHO -- whoever can get through. I'm 3 giving you an opportunity to voluntarily remove 4 this statement from the CDC website.</p> <p>5 Our government, the United States of 6 America, should not be lying when it talks about 7 science and medicine. This is not only a lie. 8 This statement is an abomination to science. 9 This statement in this page is an embarrassment 10 to every single human being on this planet that 11 calls themselves a scientist.</p> <p>12 Because of our lawsuit now, I am 13 telling you and telling you now, please volunteer 14 to take this down. Because if you do not, the 15 Informed Consent Action Network, The Highwire 16 presentation, and all of those that support and 17 follow us will use every legal means necessary to 18 make you accountable.</p> <p>19 We still need your help. I want you to 20 write to Alex Azar. Go ahead and grab a link to 21 this lawsuit win which you'll find at 22 <a href="http://icandecide.org">icandecide.org</a>. And email him at 23 <a href="mailto:secretary@hhs.gov">secretary@hhs.gov</a>. You can call him at 202-690- 24 7000 and tell him to take this abomination to 25 science down. The statement that is backed by no</p> <p style="text-align: right;">Page 58</p>	<p>1 giggling to themselves, by the way, and we put it 2 on the government of the United States. That 3 means our government accepts all liability.</p> <p>4 So let's do the math. There are 75 5 million children roughly -- 74.2 I think it is -- 6 million children in the US right now. The most 7 conservative statistic by the CDC is that we're 8 at 1 in 59 children with autism. That means that 9 it is about 1.26 million children in America with 10 autism as we speak.</p> <p>11 Now, they'll say that it cost between 12 1.5 and 3 million -- I've heard as high as \$5 13 million dollars to raise a child with autism. 14 But let's be conservative and say, at \$2 million 15 dollars per child. The moment the United States 16 of America admits we didn't do the science or 17 does a study with an unvaccinated control and 18 discovers and has to admit to you that vaccines 19 do cause autism, at \$2 million per child, and 20 1.26 million children, the liability for the 21 United States of America is \$2,520,000,000,000 22 today and growing. Two trillion.</p> <p>23 By conservative estimates, remember. I 24 went with 1 in 59. The CDC actually has polls 25 saying 1 in 36. They're saying that maybe 25</p> <p style="text-align: right;">Page 60</p>
<p>1 science whatsoever. I am tired of being 2 embarrassed by the scientific community that 3 stands for our country. It is time for real 4 science to begin now. Real honesty and 5 transparency to begin now.</p> <p>6 You have to do it. You have to take it 7 down. Now, I noticed people out there, you're 8 asking yourselves, why in God's name would the 9 government have lied about this? How is it they 10 have done no studies using an unvaccinated 11 control. How is it they have done not a single 12 study addressing the six vaccines we're giving in 13 multiple doses over and over again -- two months, 14 four months, and six months. Vaccines that 15 parents watch with their own eyes be given their 16 child right before they regressed into autism.</p> <p>17 Why would they do that though? What 18 would be the possible motive? You have to have a 19 motive. It just doesn't make sense. Do they 20 want to kill children? Do they want to destroy 21 their lives? I think it's really simple 22 actually.</p> <p>23 You have to understand when we signed 24 the 1986 Compensation Act, we took all liability 25 away from the industry. They must have been</p> <p style="text-align: right;">Page 59</p>	<p>1 percent less than where we should be at. That 2 number could be twice, if not tripled, what we 3 just showed you.</p> <p>4 Do you think it's just possible that 5 the government might be lying and covering up a 6 problem that is going to cost them \$2.5 trillion? 7 And, by the way, when they pay out that \$2.5 8 trillion, which is more than 10 percent of our 9 gross national product, what happens to the 10 confidence in our health departments? In our 11 government?</p> <p>12 See, this is why they only have 20 13 studies that have all -- by the way, every one of 14 these studies set out to do only one thing -- not 15 challenge whether or not a vaccine is safe but 16 went out of its way to prove it doesn't cause 17 autism. To prove MMR doesn't cause autism. That 18 is biased science. They went -- they did 19 everything -- they designed 20 studies to try and 20 disprove a link. And still, they couldn't do it. 21 Still they can't touch DTaP or anything else.</p> <p>22 Do we have Bernadine Healy available? 23 Just to really bang it home. Just in case this 24 hasn't done enough -- winning a lawsuit. Listen 25 to the former head of the National Institute of</p> <p style="text-align: right;">Page 61</p>

<p>1 Health. Because maybe you'll hear it in a way 2 you've never heard it before. 3 (VIDEO) 4 BERNADINE HEALY: This is the time when 5 we do have the opportunity to understand whether 6 or not there are susceptible children -- perhaps 7 genetically, perhaps they have a metabolic issue, 8 mitochondrial disorder, immunological issue that 9 makes them more susceptible to vaccines -- plural 10 -- or to one particular vaccine or to a component 11 of vaccine like mercury. 12 The fact that there is concern that you 13 don't want to know that susceptible group is a 14 real disappointment to me. If you know that 15 susceptible group, you can save those children. 16 The reason why they didn't want to look 17 for those susceptibility groups was because 18 they're afraid that if they found them, however 19 big or small they were, that that would scare the 20 public away. 21 SHARYL ATTKISSON: It sounds like you 22 don't think the hypothesis of a link between 23 vaccines and autism is completely irrational. 24 BERNADINE HEALY: So, when I first 25 heard about it, I thought, well, that doesn't</p> <p style="text-align: right;">Page 62</p>	<p>1 This was, you know, this is what we want to do. 2 What we need are tools to take to bigger and 3 bigger cases. I can tell you we got through last 4 weekend, but we still need your help. 5 You can't imagine what we can do if 6 every one of you out there donates what you can 7 on a monthly basis. Whether it's a dollar or \$2 8 or \$5. Some of you maybe it's \$1000 a month. 9 You can imagine what the potential is because 10 believe me, as we watch these, you know, these 11 laws being passed all across this country, it's 12 looking grim. 13 We don't have health departments that 14 will listen. We have got to win in court. It is 15 absolutely critical if we are going to stop the 16 takeover of pharma -- of not just our lives, but 17 everyone around the world. 18 So, if you're in Australia, if you're 19 in Poland, if you're in Germany, we need your 20 help too. ICAN is the nonprofit that is setting 21 legal precedent as we speak. So, please, help 22 us. Go to <a href="http://www.icandecide.org">www.icandecide.org</a>. Everybody that 23 joined the mission last week can personally jump 24 up and down and feel responsible for this 25 incredible win that we've had today.</p> <p style="text-align: right;">Page 64</p>
<p>1 make sense to me. The more you delve into it, if 2 you look at the basic science, if you look at the 3 research that's been done in animals, if you also 4 look at some of these individual cases, and if 5 you look at the evidence that there is no link, 6 what I come away is the question has not been 7 answered. 8 (END OF VIDEO) 9 DEL BIGTREE: And what I come away with 10 is the statement that vaccines do not cause 11 autism is not science and it is an advertising 12 slogan. It's time for real science just like 13 Bernadine Healy is demanding to be done. Our 14 lawsuit proves it must be done. You cannot make 15 that statement any longer, vaccines do not cause 16 autism. 17 Now, for those of you that are 18 watching, and many of you began contributing last 19 week -- but you have to understand this is what 20 happens to us here at ICAN. We have an amazing 21 legal team being headed by a brilliant, brilliant 22 trial attorney named Aaron Siri. 23 Well, when we win a lawsuit like this, 24 it opens up the possibility of many more 25 lawsuits. And the use of this in civil cases.</p> <p style="text-align: right;">Page 63</p>	<p>1 If you want to be able to jump up and 2 down -- if you want to be able to say to your 3 children when they're looking at their brand-new 4 history books that said, oh, my God, we don't 5 vaccinate the way we used to. We stopped all 6 those laws and freedom is ringing true because of 7 the work of the outspoken nature of brilliant 8 moms and dads and people of injured children and 9 nonprofits like ICAN and lawsuits that made a 10 difference. 11 If you want to say, you know what? I 12 put my money where my mouth was. I was a part of 13 that. Your grandchildren should know. You know 14 what, my grandpa, my grandma was one of those 15 people that supported that legal effort that 16 changed the world. 17 We've never had an opportunity like 18 this. There's never been a moment to reign with 19 a power that our founding fathers did. So I hope 20 you'll join us because it's a lot of fun. It's a 21 lot of fun to be able to say, I had something to 22 do with that. 23 So, if you've got \$20 for 2020, please, 24 once a month, \$20. This is better than Netflix. 25 This is better than that Frappuccino with all the</p> <p style="text-align: right;">Page 65</p>

<p>1 whipped cream on top. This is going after the 2 man. You want to stick it to the man? Give to 3 ICAN. All right. I love this. I love my job. 4 Let's move on. I promised you we'd 5 talk about Alzheimer's. So, I mean, the -- 6 autism is going to bankrupt America. And, by the 7 way, I think the main thing the government should 8 do is just put liability back on the industry, so 9 they tank. I don't want to see the end of our 10 government. 11 But look at all the other headlines, 12 folks. It's not only autism. Look at this. 13 This is Forbes. Blue Cross Plans says 14 Alzheimer's has tripled among adults ages 30 to 15 64. All right. It goes on to say early-onset 16 dementia and Alzheimer's disease jumped 200 17 percent among commercially insured Americans 18 between the ages of 30 and 64 -- 30 years old 19 people are getting Alzheimer's -- over a recent 20 five-year period -- a 200 percent increase in 21 five years -- a new analysis of Blue Cross and 22 Blue Shield health insurer claims shows. 23 It goes on to say, the report, the 24 latest from Blue Cross Blue Shield Association, 25 shows 131,000 people between the ages of 30 and</p> <p style="text-align: right;">Page 66</p>	<p>1 Dr. Christopher Exley. Arguably the leading 2 expert on aluminum who dissected the brains of 3 Alzheimer's patients. Just let me remind you 4 what he had to say. 5 (VIDEO) 6 DEL BIGTREE: That obviously, you came 7 to a very strong conclusion that there was a, you 8 know, strong connection between aluminum and 9 Alzheimer's. 10 CHRISTOPHER EXLEY: Well, I came to the 11 conclusion that no aluminum, no Alzheimer's. 12 DEL BIGTREE: No aluminum, no 13 Alzheimer's -- 14 CHRISTOPHER EXLEY: In the brain. 15 DEL BIGTREE: Wow. So, and so -- 16 (END OF VIDEO) 17 DEL BIGTREE: Okay. Did you see what I 18 said? I said, so you say that aluminum can 19 contribute to Alzheimer's? He said, no. My 20 official statement is no aluminum, no 21 Alzheimer's. 22 Now vaccines aren't the only place 23 we're getting aluminum. We should really be 24 watching all of the other things we're doing. 25 Whether we're eating it, drinking out of aluminum</p> <p style="text-align: right;">Page 68</p>
<p>1 64 were diagnosed with either a form of dementia 2 in 2000 -- in either form of dementia in 2017. 3 The average age of someone with either condition 4 is 49. And women are disproportionately more 5 impacted than men. The report, which is the 6 latest in the trade group's The Health in America 7 series shows. 8 Look at some of these graphs. They're 9 incredible. Two hundred percent increase -- 10 among those average 49. Look at this graph. 11 Give me the next graph -- 407 percent increase 12 amongst 30 to 44-year-old, 242 percent increase 13 amongst 45 to 50-year-olds, and 90 percent 14 increase in Alzheimer's amongst 55 to 64. I 15 mean, these are horrific stats. This is what I 16 keep talking about. No one at the CDC should be 17 proud to work there. Nobody at Health and Human 18 Services and the National Institute -- oh, we're 19 working on Alzheimer's. We're trying to find a 20 cure for Alzheimer's. 21 Do you realize how much we're pushing 22 vaccines? Do you know how many of these vaccines 23 have aluminum in them? I mean, do you realize 24 what's going on there? 25 We had the opportunity to sit down with</p> <p style="text-align: right;">Page 67</p>	<p>1 cans, cooking in it, rubbing it in deodorants 2 under our armpits. But many of these vaccines 3 are giving you gigantic doses of aluminum. 4 If you're an adult and you've just been 5 told by the CDC you should get your HPV vaccine, 6 that's a form of aluminum we've never even been 7 able to study. Gigantic ton of aluminum. 8 And, by the way, Christopher Exley and 9 his team continue to do more and more brilliant 10 work. Can -- well, how do they donate to Chris 11 Exley, by the way? I didn't plan on this. Look 12 over -- go to your comments, we'll make sure in 13 the ICAN if you type I-C-A-N, you'll get a way to 14 donate to the work Dr. Chris Exley and his team 15 are doing at Keele University. But they now 16 started to track the aluminum. You know, how it 17 goes from the injection site in or you can 18 actually donate, I just found out, to A Voice for 19 Choice. 20 A Voice for Choice is a nonprofit 21 that's been working directly with Dr. Chris 22 Exley. So if you go there, you can donate there 23 and that will move on to Keele University and do 24 that work. 25 But his team has been looking at</p> <p style="text-align: right;">Page 69</p>

<p>1 aluminum, how it travels and wraps around the 2 brain from vaccines. So, there you have it. We 3 have increasing health problems and a massive 4 mass of problems. Who wants Alzheimer's? And 5 yet you're lining up for your vaccines on a 6 constant basis. We've got to stop that. But as 7 if that wasn't bad enough news last week, how 8 about our children?</p> <p>9 Okay, 30-year-olds are getting 10 Alzheimer's. That's a problem, but we can look 11 to the other way. Look at what we're finding out 12 about your children. We just found out that 13 there's a 30 percent increase of Type 1 diabetes 14 since 2017. I'm going to guess this study ended 15 last year, so we're probably taking -- talking 16 two years Type 1 diabetes increase by 30 percent 17 in our children.</p> <p>18 Remember, this isn't Type 2 diabetes. 19 This isn't a crappy diet, eating a lot of sugary 20 foods and un -- colored drinks and Doritos and 21 things like that. That's Type 2 diabetes. We 22 never saw, really, late onset Type 1. We see 23 late onset Type 2. Why are all these children 24 getting diabetes Type 1.</p> <p>25 To get to the bottom of that, I wanted</p> <p style="text-align: right;">Page 70</p>	<p>1 it comes to vaccine safety.</p> <p>2 I stood here in October and challenged 3 this committee, the CDC, the NIH, anybody that 4 would listen to a public debate on vaccine 5 safety. And I can tell you, my phone has not 6 been ringing off the hook.</p> <p>7 So there is certainly a need for far 8 greater vaccine safety research. Without that 9 science, we can't have good communication. We 10 can't repurpose the same old science because it's 11 going to make things look better. We need more 12 investment in vaccine safety science.</p> <p>13 Those are not my words. Those are the 14 words of Heidi Larson who is the director of the 15 World Health Organization's Vaccine Confidence 16 Project.</p> <p>17 So, in 2013, the Institute of Medicine 18 was tasked with the job of determining the safety 19 of the entire vaccine schedule. What they found 20 was there wasn't any evidence. There was no 21 study comparing the health outcomes of a vaccine 22 population to a completely unvaccinated 23 population.</p> <p>24 In response, the CDC created a 25 committee of experts to determine how could you</p> <p style="text-align: right;">Page 72</p>
<p>1 to talk to Dr. James Neuenschwander. You may 2 have recognized him at the ACIP meetings. Here's 3 him kicking some more butt at the Advisory 4 Committee on Immunization Practices just last 5 week.</p> <p>6 (VIDEO)</p> <p>7 MAN 13: Next speaker is Mr. James 8 Neuenschwander please.</p> <p>9 JAMES NEUENSCHWANDER: Once again, it's 10 Dr. James Neuenschwander. I'm a physician dually 11 board certified in Emergency and Integrative 12 Medicine with over 30 years of experience caring 13 for chronically ill children and adults. I have 14 personally witnessed vaccine injuries as -- in my 15 career as an emergency room physician.</p> <p>16 And I can tell you, it is not rare. 17 And certainly more than one in a million. I've 18 also heard hundreds and thousands of stories from 19 parents and patients who will swear that it was a 20 vaccine that caused their or their children's 21 autism, autoimmunity, asthma, or other chronic 22 illness.</p> <p>23 And I'm here today to tell you, you're 24 losing the confidence of those people and the 25 health care practitioners that care for them when</p> <p style="text-align: right;">Page 71</p>	<p>1 ethically do this study using current databases 2 like the Vaccine Safety Data link -- the VSD. 3 The result was a 2015 white paper, in which they 4 outlined the 20 most concerning health 5 conditions, along with details on how to do each 6 of these studies. They even gave a specific 7 example of how to use the VSD to study how the 8 schedule affected a child's risk of asthma.</p> <p>9 That was five years ago. Nothing has 10 happened. We're all still waiting. Do the 11 study. If you want the statement Vaccines are 12 safe and effective to be anything more than an 13 advertising campaign, you need this kind of 14 science.</p> <p>15 And if you're unwilling or unable to do 16 this, please step aside and give people like me 17 access to the VSD. We'll make sure those studies 18 are done.</p> <p>19 Dr. Larson also pointed out that the 20 vaccine hesitant are winning people that are 21 cited in much greater rate than the vaccine 22 confident. They're five times more likely to go 23 to the other side. You're losing that battle.</p> <p>24 She also pointed out that there's a 25 wobbly frontline of health professionals that are</p> <p style="text-align: right;">Page 73</p>

<p>1 questioning vaccine and vaccine safety. She said 2 this is a huge problem. A huge problem that you 3 can do something about. You guys have the power, 4 and I'd like to remind you of the first ACIP 5 committee meeting in 1964. 6 MAN 13: Thank you for your comment. 7 Your time has expired. 8 JAMES NEUENSCHWANDER: Part of that 9 committee meeting challenged this committee to 10 responsibly advise for new projects and research. 11 I think it's time to step into that 12 responsibility. Please do the studies. Thank 13 you. 14 (END OF VIDEO) 15 DEL BIGTREE: Oh, my hero. Dr. James 16 Neuenschwander. Holy cow. Laying the beat down 17 at ACIP. I love this guy and he's joining us 18 right now. Dr. Neu. Man, I don't know what to 19 say. I'm in awe of -- first of all, you actually 20 -- you were -- you know, I know you fly from the 21 hipster like I do. But, like, you pulled an 22 actual quote out there by somebody else. I mean, 23 you know, getting into Heidi Larson. I mean, 24 just really, really great stuff. 25 Yeah, so, this is your area of</p> <p style="text-align: right;">Page 74</p>	<p>1 JAMES NEUENSCHWANDER: No, and we 2 appreciate the work you're doing because it's so 3 frustrating for us to be hearing about, you know, 4 there's thousands of studies on how vaccines 5 don't cause this or that. And we have the same 6 thing with Type 1 diabetes. You know, there are 7 studies that link certain vaccines with Type 1 8 diabetes like the Hepatitis B vaccine, the Hib 9 vaccine, possibly the -- even some of the flu 10 vaccines. 11 And because of that, you know, we -- 12 you have the same sort of garbage studies where 13 they're comparing, you know, 4 million kids that 14 got the DTaP with 3 million kids that, you know, 15 how -- yeah. It's the same deal. Like your Jack 16 Daniels example. 17 DEL BIGTREE: Vaxxed versus vaxxed 18 studies. The famous vaxxed -- 19 JAMES NEUENSCHWANDER: Right. Right. 20 DEL BIGTREE: - versus vaxxed studies. 21 JAMES NEUENSCHWANDER: Yeah. 22 DEL BIGTREE: Fully vaxxed versus 23 mostly vaxxed. 24 JAMES NEUENSCHWANDER: Right. And 25 you've got the same problem with all these</p> <p style="text-align: right;">Page 76</p>
<p>1 expertise. You're a doctor. You've been looking 2 at autoimmune disease. Diabetes is -- I mean, 3 Type 1 diabetes is an autoimmune disease, 4 correct? 5 JAMES NEUENSCHWANDER: Yeah, it's one 6 of those 20 health concerns I was talking about 7 that they address in that white paper. Autism 8 was another. Autism, as far as we know, is 9 autoimmune as well. 10 DEL BIGTREE: And so, the Institute of 11 Medicine basically put together an entire, you 12 know, list of things you could do. Study the 13 VSD, right? And said, you know, and basically 14 said everyone around the world, in this white 15 paper, here is how you do a study. You can pick 16 -- compare vaxxed to unvaccinated and, you know, 17 they still refuse to do it. 18 I mean, how about -- can you believe 19 this lawsuit win? I mean, you knew. This is not 20 like you're a -- it's a big surprise. But we 21 got, James. We're coming at them, man. And 22 we're not going to -- 23 JAMES NEUENSCHWANDER: Yeah. 24 DEL BIGTREE: -- let them get away with 25 this stuff.</p> <p style="text-align: right;">Page 75</p>	<p>1 autoimmune disorders. It's not just autism. 2 Type 1 diabetes is another example. 3 Now, it's not as common as autism, so 4 you don't have as many parents out there. And 5 most people don't realize that their child's 6 autoimmune disorder could be from a vaccine. 7 DEL BIGTREE: So take me through it. 8 So what are the numbers of -- so, you saw this 9 article -- 30 percent increase just in the last 10 couple of years, right? I mean, that's alarming. 11 JAMES NEUENSCHWANDER: Right. 12 DEL BIGTREE: This is a major problem. 13 This is going to shorten -- we keep talking about 14 how we're making kids' lives long -- living 15 longer. You don't live as long if you have Type 16 1 diabetes. I mean, even though we have a lot of 17 things we can do to take care of you, but you're 18 not as healthy. You have problems in your 19 future. 20 How many people are suffering from Type 21 1 diabetes in America? 22 JAMES NEUENSCHWANDER: Well, it's 23 somewhere around .5 percent. I mean, in -- with 24 kids, the incidents, meaning the number of new 25 cases per year, is somewhere in the 25 to 30 per</p> <p style="text-align: right;">Page 77</p>

<p>1 100,000. So, it's not super common.  2 But, again, those numbers build up.  3 And we know that there's a group that is  4 susceptible genetically. And so, there have been  5 studies trying to prevent Type 1 diabetes. You  6 know, if you have two parents that have Type 1  7 diabetes, your risk of developing Type 1 diabetes  8 is around 30 percent. It's pretty high.  9 So we know there are certain genetic  10 risk factors if you have those, then these are  11 people that might be monitored, and maybe you can  12 do something to prevent the diabetes.  13 You know, the -- it's sort of  14 paradoxical, but there's actually a type of  15 vaccine that they use for these kids that are at  16 high risk to try and prevent the Type 1 diabetes  17 from occurring in the first place. And this  18 vaccine actually had some promise in preventing  19 Type 1 diabetes until these kids got a flu  20 vaccine and it wiped out the benefit.  21 DEL BIGTREE: Really? Interesting.  22 JAMES NEUENSCHWANDER: Yeah. Yeah.  23 It's a bizarre thing.  24 DEL BIGTREE: And I know people say --  25 well, you're saying vaccines, you know, cause</p> <p style="text-align: right;">Page 78</p>	<p>1 type of viral illness, a flu like viral illness,  2 and then a few weeks later, they'll develop the  3 autoimmune antibodies. And within a few months,  4 they develop full blown diabetes and they're  5 diagnosed.  6 So, you have to have the genetic  7 susceptibility, but we know the virus is part of  8 the process. And so, if we're vaccinating, you  9 know, not that we're necessarily using the same  10 virus that person would receive in a native state  11 -- but we're still introducing some type of  12 infectious agent into that system.  13 And if you look at, you know, there's  14 something called UpToDate. It's a resource for  15 practitioners to refer to. Like, gee, what's the  16 latest thing on the treatment of Type 1 diabetes.  17 And if you look at UpToDate, they --  18 and you look at risk factors for Type 1 diabetes  19 -- number one is the genetics. You know, number  20 2 is viral infection. And number 3 on the list  21 is actually immunization. So it's a recognized -  22 -  23 DEL BIGTREE: Really?  24 JAMES NEUENSCHWANDER: -- risk factor  25 for developing Type 1 diabetes. Yeah. I mean,</p> <p style="text-align: right;">Page 80</p>
<p>1 autism. I mean, that's -- you're just making  2 that up. But I just want to bring up the MMR  3 insert. If you go to the MMR insert -- let's  4 pull this up right now -- measles, mumps, rubella  5 vaccine. Here it says it. An adverse reaction  6 in the endocrine system -- diabetes is listed as  7 a possible side effect. So we know that vaccines  8 can cause autism. And when we see the -- I mean,  9 cause diabetes. And when we see a 30 percent  10 increase, I just keep thinking, I'm looking at  11 all these mandates.  12 I'm looking at California. People are  13 vaxxing their kids even though they don't want to  14 just to keep them in school. I mean, we're  15 increasing the vaccination rates so we're seeing,  16 you know, a climb in these autoimmune diseases.  17 Do you have any sense -- do we have any  18 theories on why or how a vaccine might cause  19 diabetes? Or other, you know, autoimmune  20 disease?  21 JAMES NEUENSCHWANDER: Well, you've got  22 -- sure. You've got a couple issues. I mean, we  23 know, sort of, in a natural state, the big risk  24 with Type 1 diabetes is you have the genetic  25 predisposition. And then a person will get some</p> <p style="text-align: right;">Page 79</p>	<p>1 I'm not making this up. This is -- this is part  2 of what they put in there.  3 Now, all of the stuff in UpToDate is  4 supposed to be based on current evidence.  5 Current research. So, you know, I haven't looked  6 into what their references are but, you know,  7 somebody just pointed it -- that out to me a  8 couple of days ago.  9 I'm not an expert on Type 1 diabetes.  10 I deal with kids on the autism spectrum. I deal  11 with autoimmunity. I deal with chronically ill  12 adults. And most of this stuff is immune stuff.  13 I mean, there -- their immune system is not  14 working the way it's supposed to.  15 So, whether it's an allergy, it's an  16 autoimmune disorder and -- where it's something  17 like autism, which appears to be autoimmune  18 encephalitis, you know, inflammation of the  19 brain. It's all the same stuff.  20 So, if you look at the curves of, you  21 know, the autoimmune curves, room -- juvenile  22 rheumatoid arthritis, lupus, MS, autism, Type 1  23 diabetes -- they're all, you know, they all go  24 up. It's just autism is the most common.  25 And so, you know, you've got 1 in 36</p> <p style="text-align: right;">Page 81</p>


<p>1 kids with autism. You do not have 1 in 36 kids 2 with Type 1 diabetes. So, you just don't hear 3 about all these other things. 4 DEL BIGTREE: Hm. 5 JAMES NEUENSCHWANDER: But it's 6 happening with all the autoimmune diseases. All 7 of them. 8 DEL BIGTREE: All right, here's the 9 numbers with kids with diabetes -- according to 10 the report, between 2002 and 2015, cases among 11 African-American children increased by 20 percent 12 with 20.8 children diagnosed per 100,000. 13 Cases among Hispanic children is 20 14 percent with 16.3 per 100,000. Asian/Pacific 15 Island children increased 19 percent with 9.4 per 16 100,000. And then, white children, the slowest 17 growing demographic with a 14 percent increase, 18 yet remain the most impacted group with 27.3 19 cases per 100,000. 20 There you have it. I mean, I think the 21 point though, James, that you keep arguing at the 22 CDC -- I do too -- it's what we're doing here on 23 The Highwire. What's it going to take? I mean, 24 what's it going to take? 25 It's not like our kids are just like</p> <p style="text-align: right;">Page 82</p>	<p>1 at. We're probably somewhere near, like, 65-70 2 percent autoimmune disease. 3 Yes, you. If you're out there saying, 4 oh, my kid has asthma, but that's normal. Oh, my 5 kid has diabetes, but that's normal. Oh, my kid 6 has plaque psoriasis, they're telling -- wipe -- 7 wipe creams. If your kids are wiping creams all 8 over their bodies, if they have to take any pill 9 in the morning, then you really may want to 10 question vaccines. I don't know how to put it 11 any simpler. James, what have we have to do to 12 wake people up? 13 JAMES NEUENSCHWANDER: Good question. 14 We need more people listening to you. You're a 15 much better preacher than I am. 16 DEL BIGTREE: Oh, I don't know about 17 that. By the way, (indiscernible) do a show. 18 I'm just -- I'm telling my team right now. This 19 our guy. You get this desk. We'll bring you in 20 to guest. 21 Well, James, thank you for all your 22 great work. Thank you for that information. I 23 know you're, you know, you do a great work 24 healing children -- taking children out -- taking 25 care of children. But you're also such a great</p> <p style="text-align: right;">Page 84</p>
<p>1 shining glowing examples of health here in 2 America. 3 JAMES NEUENSCHWANDER: I don't know. 4 DEL BIGTREE: You know, they keep 5 pushing this vaccine program, and our kids are 6 just getting sicker and sicker and sicker. And, 7 by the way, our elderly now are getting 8 Alzheimer's earlier and earlier and earlier and 9 are starting to die earlier and earlier and 10 earlier. I can't tell you how many times I hear 11 from somebody say my grandma got a flu shot and 12 died three days later. Or pneumococcal vaccine. 13 I mean, it really -- you've to be 14 asking yourself, James, and you have clients 15 coming in. Are we just zombies? I mean, are we 16 toast? Are there just too many stupid people 17 that these headlines -- that it's not bothering 18 anybody? This rise from 12.8 percent chronic 19 illness -- mostly autoimmune disease to now 54 20 percent. 21 And, by the way, I think that number is 22 baloney. I think that number comes from, like, 23 2000 -- I mean, it says, you know, 2011. But the 24 truth is is -- I don't -- I think that study 25 ended in 2007. Like, we have no idea where we're</p> <p style="text-align: right;">Page 83</p>	<p>1 spokesperson for this movement, so keep up the 2 great work, all right. 3 JAMES NEUENSCHWANDER: All right. 4 Thanks, Del. 5 DEL BIGTREE: Talk to you soon. Okay. 6 Well, we're almost there. We're almost to the 7 end of this gigantic -- I think -- I think -- I 8 think I've passed all the slides I could have 9 made a mistake on or anything like that. But I 10 do want to talk about a great event that's coming 11 up. 12 Again, we're not just talking about 13 this country. This pharma sweep is trying to 14 take over the whole world and so, I'm on my way 15 to Munich, Germany for an event. There's a lot 16 of us that are going to be speaking there. 17 This is an international event. 18 They're expecting, I think, 10, you know, over 19 10,000 people. I want to talk to one of the 20 organizers of that event right now. Martina -- 21 we have a video to promote it. Let's take a look 22 at this video for the event in Munich. 23 (VIDEO) 24 TINA CHOY: It is time. Europe is 25 rising up. We've finally had enough of an</p> <p style="text-align: right;">Page 85</p>

<p>1 almighty pharmaceutical industry censoring our 2 internet, controlling our media, our courts, and 3 our governments.</p> <p>4 Mandatory vaccination is a violation of 5 our physical integrity, of our freedoms 6 guaranteed by the charter of human rights, and is 7 limiting our access to education, employment, and 8 free circulation of citizens.</p> <p>9 The global agenda of mandatory 10 vaccination is marching fast. After Italy in 11 2017, and France in 2011, many other countries 12 are following this line. The latest country to 13 follow is Germany in 2020.</p> <p>14 These mandates will soon be extended to 15 adults, pregnant women, and elderly people. The 16 Network for Vaccine Choice Germany, in 17 collaboration with the European Forum for Vaccine 18 Vigilance is organizing a massive protest to show 19 the world that we are here. More determined than 20 ever.</p> <p>21 This is not the time to hesitate. It 22 is the time to act. Join us in Munich on March 23 21, 2020. During the demonstration, there will 24 be speeches from eminent people who fight 25 everyday against discrimination and unfair</p> <p style="text-align: right;">Page 86</p>	<p>1 But the World Health Organization is 2 becoming this superpower that's controlling all 3 of our different nations. And, of course, we 4 know that's being funded by pharma.</p> <p>5 So, you know, March 21st, if anyone is 6 anywhere in the area around Munich -- in Europe - 7 - anywhere. Are you expecting people coming from 8 different countries? What's the plan?</p> <p>9 TINA CHOY: Yes. Hi, Del. Thank you 10 for having me. Wow. We are expecting people 11 from Europe -- it's gotten a little more 12 difficult now with the coronavirus situation, but 13 we're still determined to make this big and to 14 show the world and Europe and everyone that it 15 has to stop. Mandates have to go away. And we 16 can't have this anymore.</p> <p>17 A line has been crossed. We're all 18 agreed on that. And so, we have to see this 19 through and have this protest. Yes.</p> <p>20 DEL BIGTREE: You know, it's 21 interesting you bring up coronavirus. There are, 22 you know, there are European nations now that are 23 stopping gathering in streets, right? I mean, 24 that's something that could affect Germany in the 25 near future. I guess we'll have to keep our eye</p> <p style="text-align: right;">Page 88</p>
<p>1 obligations.</p> <p>2 You will hear Mrs. Vera Sharav from New 3 York City, a holocaust survivor, and the founder 4 of the Alliance of Human Research Protection. 5 She is a fierce pharma critic who wants to give 6 us all a warning about the direction in which 7 we're headed.</p> <p>8 And you will get the chance to meet 9 Robert F. Kennedy, Jr. who is leading the battle 10 in America to defend informed consent, first 11 freedoms, and our health with his organization, 12 Children's Health Defense.</p> <p>13 We need you to make it happen. Please 14 join us on March 21st and support us with a 15 donation. It is for you and it is for all of us.</p> <p>16 Thank you for being with us and see you 17 very soon in Munich.</p> <p>18 (END OF VIDEO)</p> <p>19 DEL BIGTREE: All right. I'm joined by 20 Tina Choy, who you saw in that video, that's 21 putting on this amazing event in Munich. I'm 22 really looking forward to this because, look, we 23 need all hands on deck. Not just here in the 24 United States. I think we're driving a lot of 25 this forward.</p> <p style="text-align: right;">Page 87</p>	<p>1 on that.</p> <p>2 Again, a weird side effect -- this type 3 of fear over an illness is keeping people from 4 being able to gather. Hopefully that doesn't 5 happen.</p> <p>6 But you have an amazing lineup, right? 7 You've got -- I understand, you know, Robert 8 Kennedy Jr is going to be there -- my good 9 friend. I think you have Mary Holland is 10 planning on getting out there. Is that right? I 11 know I'm going to be out there.</p> <p>12 TINA CHOY: (sound drops) but you will 13 be out there, yes. Mary Holland can't make it, 14 unfortunately, she had prior --</p> <p>15 DEL BIGTREE: Oh, okay. I'm sorry. All 16 right. Very good.</p> <p>17 TINA CHOY: (sound drops).</p> <p>18 DEL BIGTREE: I'm on my way. We're 19 going to make that happen. So, look. I think 20 it's important because I know that people all 21 around Europe and around the world are watching 22 The Highwire.</p> <p>23 This is an opportunity. We're going to 24 be there. We're going to be standing with you. 25 I'm sure there's a lot of people in our movement</p> <p style="text-align: right;">Page 89</p>

<p>1 here in America that have come out because it's 2 really, really important. 3 So, it there a difference, do you 4 think, when you look at, you know, what's 5 happening with our laws being passed in America - 6 - do you feel like Europe -- that it's moving 7 slower? Do you feel like you're, you know, more 8 safe there? Or are you just as worried? Is 9 there any difference between what's going on in 10 Europe and America right now? 11 TINA CHOY: To be honest, I don't see 12 any difference. Because you know Germany was 13 always considered the bulwark against mandatory 14 vaccinations in Europe. And so, now, we just 15 fell so easily. 16 In -- two years ago, Chancellor Merkel 17 said, it is very difficult to implement mandatory 18 vaccinations in Germany. There are many 19 obstacles. And then, they just pushed it 20 through. It was the democratic parties pushing 21 it through just like that. They didn't listen to 22 the experts. 23 And here we have it on -- this month, 24 1st of March, we have mandatory measles 25 vaccination. This is the first mandate we have</p> <p style="text-align: right;">Page 90</p>	<p>1 the courts to debate. 2 DEL BIGTREE: Absolutely. Well, look. 3 I'm going to be there March 21st, come hook or by 4 crook. We will be there. I'm not worried about 5 the coronavirus. And I don't think most of us in 6 this movement are. So, as long as we're allowed 7 to stay in the streets, we're going to be there. 8 Yeah, we'll be live streaming it on The 9 Highwire, so anyone that can't make it, you'll be 10 able to check it out. But go ahead. If they 11 want to donate to the European Forum for Vaccine 12 Vigilance, where do we go? 13 Here we have it. In Munich -- what's 14 the website that they can go to? Can we bring up 15 the donation -- do we have that? 16 TINA CHOY: (sound drops) yeah. If you 17 don't have it, it's the efvv.eu, and then, you 18 find it under content. It's the Munich protest. 19 And there, you can donate to the protest to bring 20 fabulous people over like yourself and Robert F 21 Kennedy Jr. 22 And, very important also for Germany, 23 is Vera Sharav. She is -- 24 DEL BIGTREE: Right. I'm looking 25 forward to that.</p> <p style="text-align: right;">Page 92</p>
<p>1 since the smallpox vaccine in Germany. 2 And it's not just the measles vaccine 3 because we don't have single measles vaccine in 4 Germany, so effectively, this is an MMR or even 5 an MMRV vaccine mandate that we're having. 6 So, yeah. What is special about 7 Germany as well is that -- first of all, this is 8 a mandate not just for children, but also for 9 adults. 10 DEL BIGTREE: Wow. 11 TINA CHOY: Any adults working with 12 children, so teachers, day care, anyone. And 13 also, working with patients. So, any hospital 14 staff, doctors, they all have to get that measles 15 shot now. 16 DEL BIGTREE: Wow. 17 TINA CHOY: And the second (sound 18 drops) -- 19 DEL BIGTREE: Go ahead. 20 TINA CHOY: -- is (sound drops) yeah, 21 sorry. Is that we in Germany have a mandatory 22 school system. So, we cannot homeschool. It's 23 outlawed. So, now, I have mandatory school and 24 mandatory vaccination, what am I going to do. 25 That's going to be a very interesting case for</p> <p style="text-align: right;">Page 91</p>	<p>1 TINA CHOY: -- like -- and a holocaust 2 (sound drops) yeah. And it is so important to 3 hear her message on German soil, I think, because 4 she -- for the first time, she will speak about 5 how this resembles the Third Reich and what they 6 did. And how this is all over the globe now. 7 And I think we cannot close our eyes from that 8 anymore. 9 And I know that it's going to be a very 10 difficult conversation to have or difficult to 11 hear for many people. But the whole world needs 12 to hear this message from Vera, so I'm very 13 looking forward to this. 14 And also, just to see those great 15 heroes like Bobby Kennedy and yourself and, you 16 know -- 17 DEL BIGTREE: Very amazing. 18 TINA CHOY: Yes, very happy. 19 DEL BIGTREE: Thank you for putting 20 this all together. I look forward to spreading 21 that message. We'll make sure to get it all 22 around the world. So, we'll be in Munich, 23 Germany on March 21st if you want to join us 24 there. 25 Tony, keep up the good work and I'll</p> <p style="text-align: right;">Page 93</p>

<p>1 see you in -- literally, just a -- Tina I mean.  2 Tina, I'll see you in a few days.  3 TINA CHOY: That's great. Can't wait.  4 DEL BIGTREE: All right. All right.  5 TINA CHOY: Bye.  6 DEL BIGTREE: Well, that's about it for  7 our show. I want to talk about one last thing.  8 What it means to be a warrior. True warrior.  9 You know, people ask me -- Del, you know, how do  10 you, you know, aren't you worried? Aren't you be  11 -- worry -- what's going to happen?  12 And I often say, you know, I don't  13 think we decide how long we're going to be on  14 this planet. We can only decide the quality of  15 the life we have while we're here.  16 We lost one of our favorites this week.  17 here's a little bit from Toni Bark.  18 (VIDEO)  19 TONI BARK: I am Dr. Toni Bark. I am a  20 licensed MD in the State of Illinois. I trained  21 in pediatrics and rehab medicine, and I ran an  22 emergency room -- pediatric emergency room in the  23 inter-city.  24 I travel around and I speak -- I'm  25 going to be speaking about Ketogenic diet for</p> <p style="text-align: right;">Page 94</p>	<p>1 the story before. Within a month, her teeth  2 crumbled and fell out. She developed a heart  3 murmur and asthma. And the vet said, it's from  4 vaccination. I said, what do you mean?  5 It's like the first time I really heard  6 what vaccines -- it was from vets. They all  7 said, we know we've been vaccinating more  8 generations that we've been vaccinating -- of  9 animals than humans. And it's very clear that  10 we're causing more autoimmune diseases.  11 DEL BIGTREE: Mm hm.  12 TONI BARK: And disrupting the immune -  13 - immune system and causing some cancer. I can  14 tell you that when I started discovering this a  15 few years ago, like, all -- really how crazy it  16 was. I was doing my master's in disaster medical  17 management. And I felt like I was falling  18 through a rabbit hole.  19 And I do know analytic doctors who  20 still don't get because they don't want to get  21 it. If they let themselves get it, they'd have  22 to -- it rocks your world. And I don't mean that  23 in a good way. You know. So --  24 DEL BIGTREE: Right.  25 TONI BARK: -- Oh, you rock my world.</p> <p style="text-align: right;">Page 96</p>
<p>1 reversing disease.  2 I want to talk about issues in vaccine  3 programs. And in vaccines themselves.  4 Requirements for medical exceptions are  5 lagging about 30 years behind the science of the  6 epigenetic risk factors.  7 We're doing things to our genetic  8 expression -- to our phenotypes that we don't  9 understand.  10 This is a liability free product that  11 is being mandated on children who have epigenetic  12 susceptibility to injury.  13 DEL BIGTREE: I have a special guest  14 today. The brilliant and the beautiful doctor,  15 Toni Bark. So, you're a doctor. You went  16 through med school. Where did you start really  17 looking at vaccines? And where do this, you  18 know, this turn toward the -- the turn against  19 your own kind?  20 TONI BARK: I was inundated and  21 indoctrinated, you know, and I vaccinated in the  22 clinic. I had no choice really, but I didn't  23 really think much. It was the '80s.  24 I moved to Israel, came back with a  25 cat. Had it vaccinated -- people hear have heard</p> <p style="text-align: right;">Page 95</p>	<p>1 No. It rocks your world, like, everything I  2 thought was order is now disorder. Because the  3 CDC is lying to me because they're in cahoots  4 with big pharma.  5 DEL BIGTREE: People will always -- so,  6 you can't go back. We can't go back to clean  7 meat, clean food, clean --  8 TONI BARK: Yes, we can.  9 DEL BIGTREE: -- you know, water that -  10 - this is the world we live in.  11 TONI BARK: We could if we demanded it.  12 It's the canola oil, the soy bean oil, the corn,  13 the cottonseed oil, the corn itself. The sugars  14 from the corn or from the (indiscernible). It  15 requires a level of consciousness and effort that  16 a lot of people don't want to put out.  17 But it's what it's going to take in  18 order to change the toxic soup we live in.  19 We need to stay vigilant. We need to  20 educate people. What is going on that everyone  21 has cancer and immunosuppression? Why?  22 The problem with the Hepatitis B shots  23 that are out in most nations is that we know  24 there's a fair amount of people who are not  25 responders to it.</p> <p style="text-align: right;">Page 97</p>

<p>1 I did the study. I volunteered as a --  2 when I was a resident in pedes and rehab to be in  3 that -- in the Hepatitis B study. I had three  4 rounds. Never seroconverted to antibodies. It  5 turns out, after I did my (indiscernible) -- I  6 actually have both of those non-respondered, you  7 know, (indiscernible) variance. And they gave me  8 a fourth dose anyway. Well, it didn't work three  9 times, maybe it will work the fourth time.  10 DEL BIGTREE: What do you do? I mean,  11 you're very health conscious.  12 TONI BARK: I very --  13 DEL BIGTREE: Did you somehow clean  14 your body out?  15 TONI BARK: Well, okay --  16 DEL BIGTREE: I mean, I'd be worried  17 about that.  18 TONI BARK: I am worried about it.  19 Obviously, I had a lot of aluminum and mercury in  20 me from that vaccine.  21 DEL BIGTREE: You've saved so many  22 children just from courtrooms that are involved  23 in these cases where one parent is trying to  24 vaccinate and the other one isn't.  25 TONI BARK: I see the courtroom as our</p> <p style="text-align: right;">Page 98</p>	<p>1 DEL BIGTREE: Well, I don't think I've  2 ever met anyone that truly lived while she was  3 alive. We lost her this week. I think that, you  4 know, of all the people I know, and we knew when  5 she was going through this that she said she  6 wasn't afraid to die because she had lived.  7 And I think she's a representation of  8 what we should be when we get up in the morning.  9 At the end of every day, this might be our last  10 day. We do not decide that. What did we do  11 today? Did we make a difference? Did we really,  12 truly try to make the world a better place? Did  13 we really care -- not only about the future for  14 our children, but as the Native Americans would  15 say, seven generations ahead? Are we doing  16 what's right for this planet or our people?  17 We can do more. We can do better.  18 Every day, we should get up. And Toni Bark  19 represents the best of who we are, you know.  20 Every -- I mean, she was one of the best we had -  21 - as far as courtrooms, she fought for so many  22 children to not be vaccinated when divorces were  23 going on and parents were trying to force  24 vaccinate those children.  25 I spoke so many times -- standing with</p> <p style="text-align: right;">Page 100</p>
<p>1 -- the place that we actually can have the debate  2 because we're allowed to present.  3 You know, they try to badmouth, and  4 they say that I'm not really an expert. Well, I  5 just had another case this week that cleared in  6 the courtroom. On this -- you know, it's in the  7 records. The other -- they conceded that I'm an  8 expert and adverse (indiscernible) and they even  9 said vaccines. I just say adverse  10 (indiscernible), but I've been cases where the  11 judges kind of know what's going on. They've  12 seen it, you know.  13 Or lawyers are familiar with it because  14 they've represented people that were injured in  15 the vaccine court. So, there are more and more  16 people where it's touching them personally. And,  17 you know, I know it's a lot of work to educate  18 one courtroom at a time, but it's happening.  19 DEL BIGTREE: You're one of the best  20 there is.  21 TONI BARK: You know that's how the  22 world's been changed. One person at a time.  23 DEL BIGTREE: Dr. Toni Bark, you are a  24 force to be reckoned with.  25 (END OF VIDEO)</p> <p style="text-align: right;">Page 99</p>	<p>1 her. One of the smartest people I've ever met.  2 But, you know, there was the other side of her  3 that would jump into frozen glaciers and travel  4 the world and, you know, did all sorts of amazing  5 adventures. Was adventurous herself.  6 So, it's just an honor to have known  7 you, Toni. Her memorial is on Saturday. So if  8 you want to check that out, here's the -- it's at  9 1:00 to 4:00 central time in Evanston, Illinois.  10 Her family is sitting in shiva right now. And I  11 want to let you know that if you can't be in  12 Illinois, as I know many of you can't, we will be  13 streaming that memorial live on The Highwire on  14 Saturday between 1:00 and 4:00 so that everybody  15 can be a part of that. Let's go forth. Let's  16 make a difference. Let's not waste our time  17 here. This is The Highwire. I love you, Toni.  18 I love all of you. See you next week.  19 (VIDEO)  20 DEL BIGTREE: Thanks for watching. And  21 thank you for being a Highwire insider. Be sure  22 to share this show with your friends on Facebook,  23 YouTube, Periscope and Instagram. Because  24 knowledge is power. Power is freedom. And we  25 need all we can get.</p> <p style="text-align: right;">Page 101</p>

<div>1 CERTIFICATION</div> <div>2</div> <div>3 I, Sonya Ledanski Hyde, certify that the</div> <div>4 foregoing transcript is a true and accurate</div> <div>5 record of the proceedings.</div> <div>6 Date: March 10, 2021</div> <div>7</div> <div>8</div> <div>9</div> <div>10 </div> <div>11 veritext Legal Solutions</div> <div>12 330 Old Country Road</div> <div>13 Suite 300</div> <div>14 Mineola, NY 11501</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	
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[1 - accurate]

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**[asks - brand]**

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**[choy - coronaviruses]**

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**[corporate - diabetes]**

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**[diabetes - effects]**

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**[efficacious - fighters]**

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**[fighting - god's]**

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**[highwire - institute]**

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[really - rubbing]

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## [study - think]

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[think - type]

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[type - want]

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**[want - years]**

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[years - zombies]

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# Exhibit 16

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Facebook

# Keeping People Safe and Informed About the Coronavirus

December 18, 2020

By Kang-Xing Jin, Head of Health

*[Jump to latest news](#)*

## Summary

Facebook is supporting the global public health community's work to keep people safe and informed during the coronavirus public health crisis. We're also working to address the long-term impacts by supporting industries in need and making it easier for people to find and offer help in their communities.

Here's an overview of how we're providing access to accurate information, supporting relief efforts and keeping people connected. We'll continue to add to this post as we announce updates.

### 1. Ensuring everyone has access to accurate information and removing harmful content

- Connecting people to credible information on [Facebook](#), [Messenger](#), [Instagram](#) and [WhatsApp](#)
- Combating COVID-19 [misinformation](#) across our apps
- Investing [\\$100 million in the news industry](#) and supporting [fact-checkers](#)

- Prohibiting exploitative tactics in ads and banning ads for medical face masks, hand sanitizer, disinfecting wipes and COVID-19 test kits

## 2. Supporting health and economic relief efforts

- Matching [\\$20 million in donations](#) to support COVID-19 relief efforts and donating [\\$25 million to support healthcare workers](#) on the front line
- Investing [\\$100 million in small businesses](#) and making it easier for people to [support their local businesses](#)
- [Supporting global health organizations](#) with free ads and more
- Empowering partners with [data and tools](#)

## 3. Keeping people connected

- Making it easier for people to [request or offer help](#) in their communities
- Helping local governments and emergency health organizations reach people on [Facebook](#) and [Messenger](#), and collaborate using [Workplace for free](#)
- Sharing [well-being tips and resources](#) and donating \$2 million to support mental health crisis helplines
- Keeping our apps [stable and reliable](#)

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## Latest News

Update on December 18, 2020 at 4:00AM PT:

### Updating Our Ad Policy for COVID-19 Vaccines

Given the recent approval of COVID-19 vaccines, we want people to be able to safely promote information about these vaccines on Facebook. We will now allow ads that highlight the ability of a COVID-19 vaccine to prevent someone from contracting the virus, as well as ads promoting ways to safely access a COVID-19 vaccine. We'll continue to prohibit content that tries to exploit the pandemic for commercial gain. And ads or organic

posts that promote the sale of a COVID-19 vaccine, such as attempts to sell COVID-19 vaccine kits or expedited access to the vaccine, will be rejected. We will also reject ads that claim the vaccine is a cure for the virus.

It will take some time to train our systems and teams on these policies, and we expect enforcement to ramp up over the coming weeks and months.

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**Update on December 11, 2020 at 10:00AM PT:**

### **Providing Aid to Diverse Suppliers through Receivables Financing**

In response to the ongoing impact of the COVID-19 pandemic – particularly the challenges facing minority and women-owned businesses – we recently launched [The Facebook Receivables Financing Program](#) to support US-based suppliers. This one-year financing program allows minority, women, veteran, LGBTQ and disability-owned companies that are headquartered in the US and have been paid directly by Facebook in 2019 or 2020 to have their invoices paid now instead of in the 60 to 120 day period it normally takes to get paid for work they've already done. Our goal with this program is to help level the playing field by providing businesses with access to more working capital.

We'll do this by providing immediate cash for work suppliers have done and pay they're owed by other, non-Facebook, companies. Suppliers can upload eligible invoices to the Receivables Financing platform and get funded in a few days. We partnered with Supplier Success, a minority-owned business with extensive experience providing receivables financing, to administer our Receivable Financing platform and collaborated with Crowdzy.io to operate a seamless and secure platform to safely buy receivables. Together, Supplier Success and Crowdzy.io will collect the suppliers' invoices from their customers, and Facebook will reinvest the collected receivables to purchase additional invoices. Facebook is not making any return on these funds.

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**Update on December 3, 2020 at 6:00AM PT:**

### **Removing False Claims About COVID-19 Vaccines**

Given the recent news that COVID-19 vaccines will soon be rolling out around the world, over the coming weeks we will start removing false claims about these vaccines that have been debunked by public health experts on Facebook and Instagram. This is another way that we are applying our policy to remove misinformation about the virus that could lead to imminent physical harm. This could include false claims about the safety, efficacy, ingredients or side effects of the vaccines. For example, we will remove false claims that COVID-19 vaccines contain microchips, or anything else that isn't on the official vaccine ingredient list. We will also remove conspiracy theories about COVID-19 vaccines that we know today are false: like specific populations are being used without their consent to test the vaccine's safety. We will not be able to start enforcing these policies overnight. Since it's early and facts about COVID-19 vaccines will continue to evolve, we will regularly update the claims we remove based on guidance from public health authorities as they learn more.

We will also continue to help people stay informed about these vaccines by promoting authoritative sources of information through our [COVID-19 Information Center](#).

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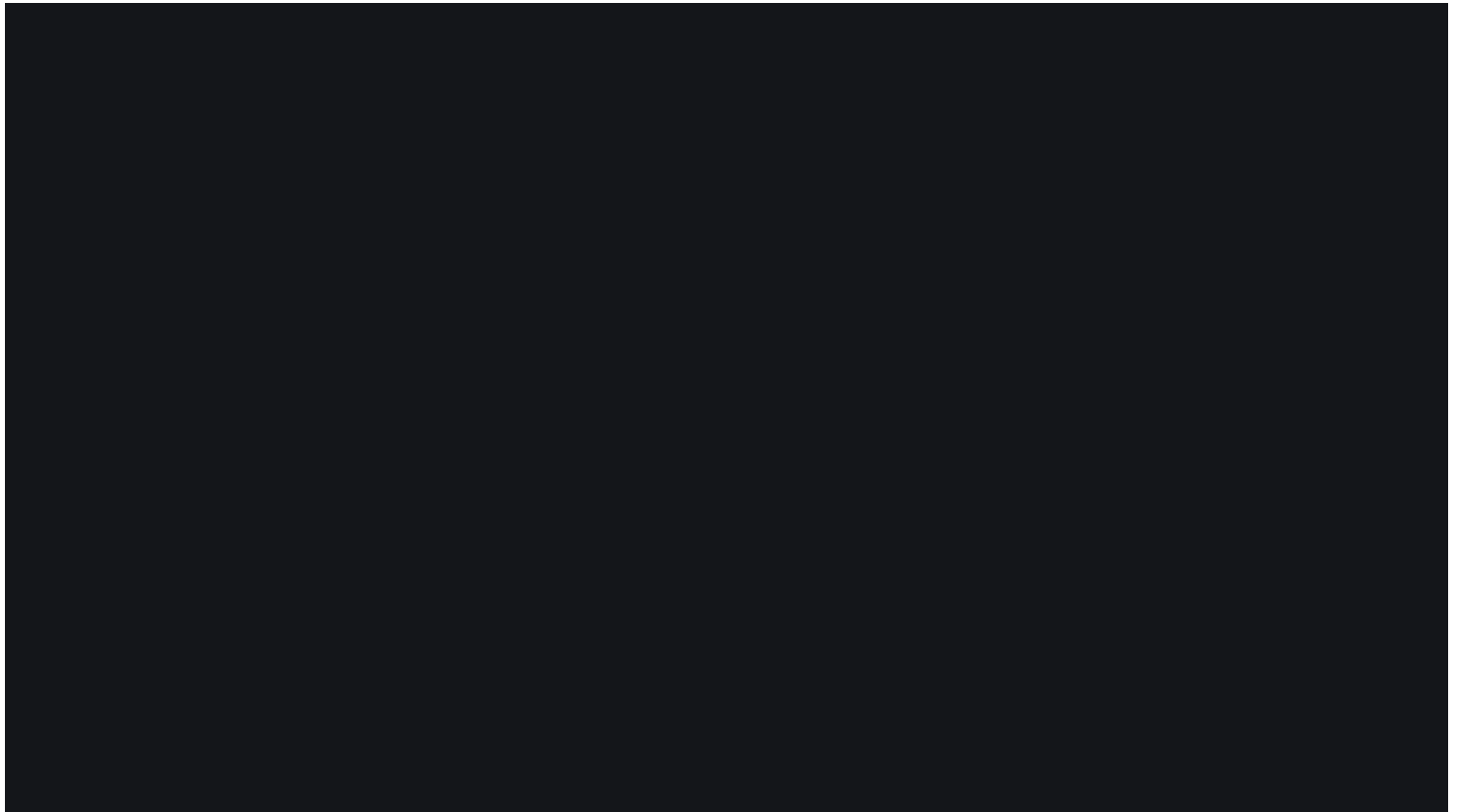
**Update on November 30, 2020 at 3:00PM PT:**

Mark Zuckerberg is live with Dr. Anthony Fauci, America's top infectious disease expert, to discuss progress toward a COVID-19 vaccine and how we can slow the spread of the virus this holiday season.



Mark Zuckerberg was Live





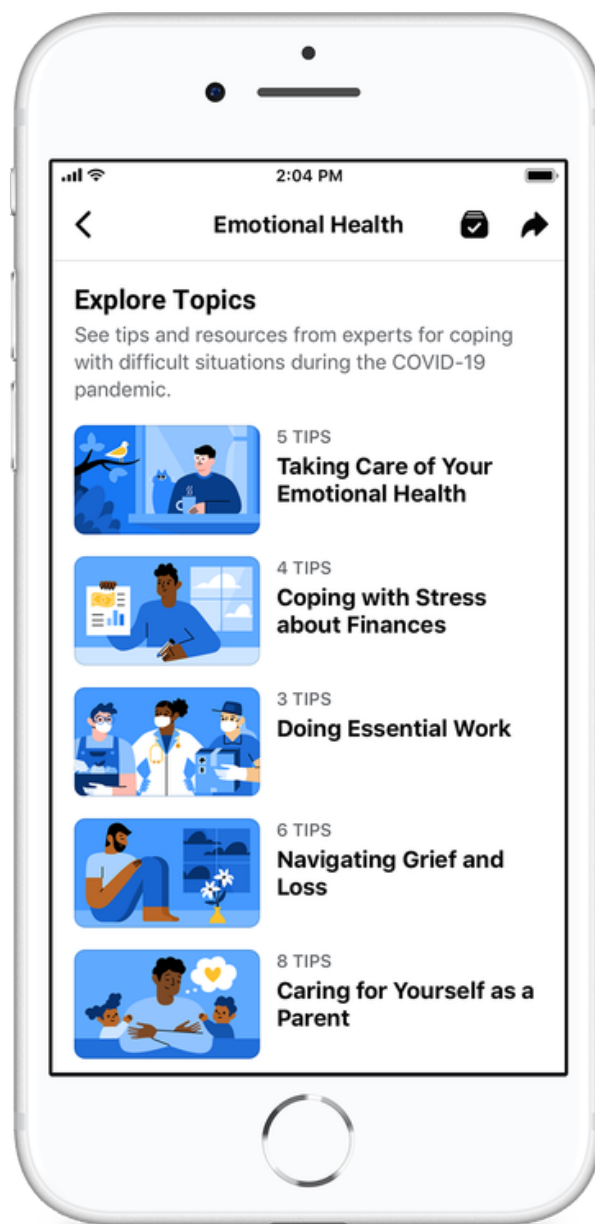
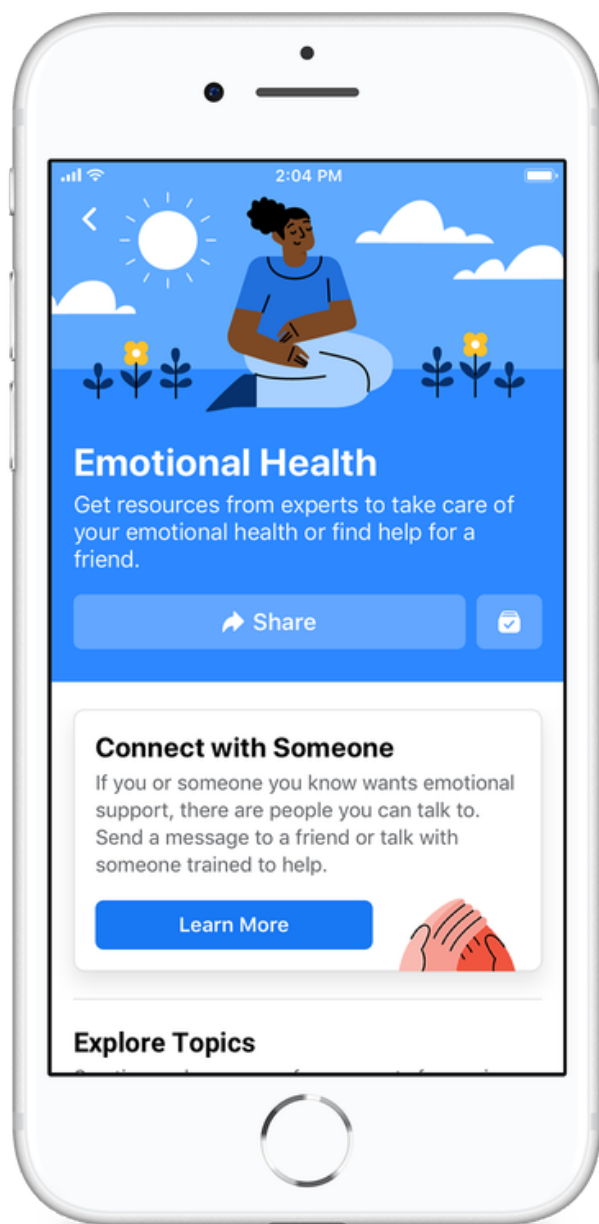
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**Update on October 5, 2020 at 8:50AM PT:**

## **Connecting People to Mental Health Resources**

Experts agree that COVID-19 has exacerbated mental health challenges around the world, and the repercussions will be felt for years to come. We've been working with leading authorities around the world — like NAMI, Kids Help Phone and It's OK to Talk — to invest in the critical areas of mental health support, including handling financial stress, parenting support, coping with loss and grief, managing substance use and taking care of overall emotional health. Today we're introducing Emotional Health, a [centralized resource center](#) on the Facebook app with tips and information from leading experts. The resource will be available globally, with locally relevant information from mental health officials.

[Learn more](#) about how we're making it easier for people to get the support they need for themselves and others who might be struggling.



Update on August 19, 2020 at 10:05AM PT:

## Allowing the Promotion and Sale of Hand Sanitizer and Surface Disinfecting Wipes

In March, we temporarily banned ads and commerce listings for hand sanitizer and surface disinfecting wipes to help protect against scams, inflated prices and hoarding. Since then, we've continued to monitor trends and activity around COVID-19 to better understand how people are using our platform and advertising tools during the pandemic. Today we're scaling back this temporary ban to allow people to promote and trade hand sanitizer and

surface disinfecting wipes on our apps.

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**Update on August 17, 2020 at 7:40AM PT:**

## **Supporting Teachers, Parents and Students This Back-To-School Season**

Back-to-school looks different this year due to COVID-19, and parents, teachers and students around the world are facing a myriad of challenges, from remote teaching and learning, balancing work and home responsibilities, and most importantly, maintaining the safety and well-being of everyone involved. To help, we're launching an [Educator Hub](#) to support teachers and providing resources across our apps to help people stay connected and take care of each other. The Educator Hub will help teachers find or build their online communities and discover guides and other resources for the classroom and beyond.

[Learn more.](#)

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**Update on July 16, 2020 at 2:02PM PT:**

Mark Zuckerberg is live with Dr. Anthony Fauci, America's top infectious disease expert. They'll discuss the US' response to COVID-19, progress on a vaccine, and what we need to do next to stop the spread of the virus.



Live with Dr. Fauci, the nation's top infectious disease expert, discussing how to slow t...  
Mark Zuckerberg was Live



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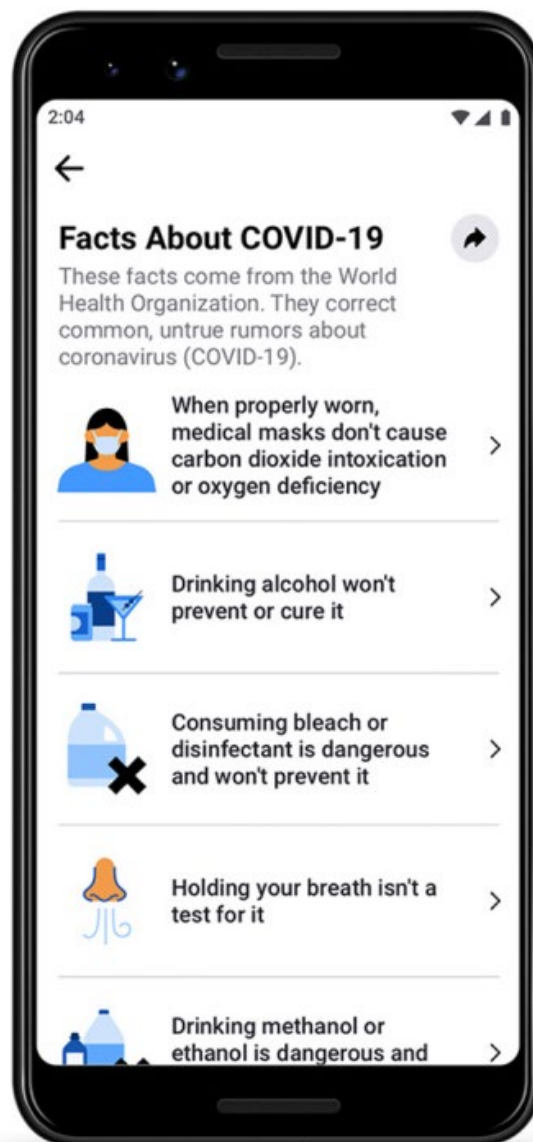
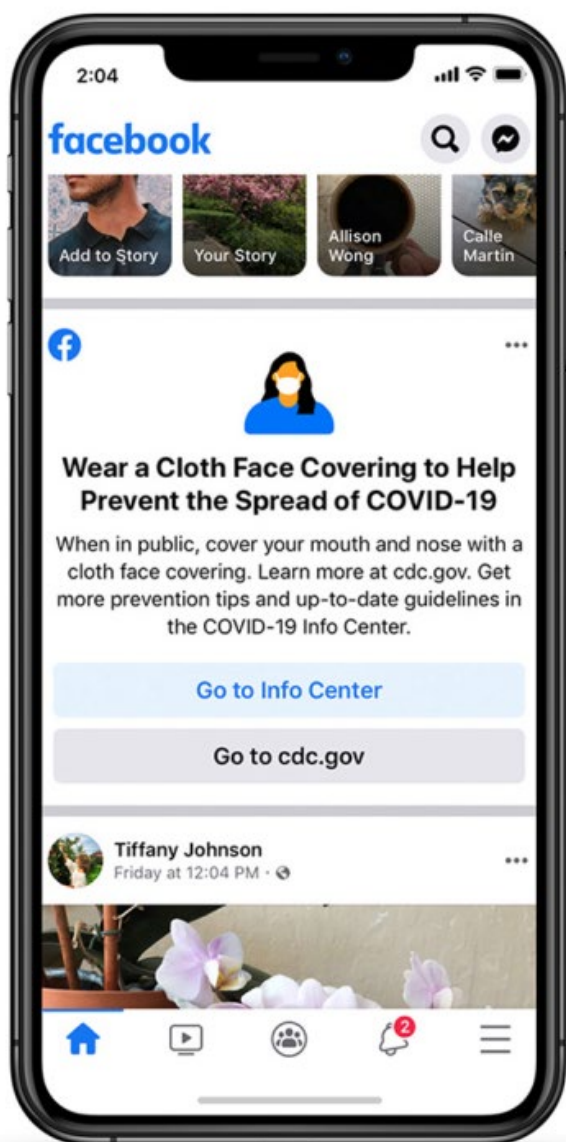
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### Update on July 15, 2020 at 10:00AM PT:

We continue working to keep people safe and informed about COVID-19. We have connected over 2 billion people to resources from health authorities through our [COVID-19 Information Center](#) and pop-ups on Facebook and Instagram with over 600 million people clicking through to learn more. Since January, people have raised over \$100 million for COVID-19 related fundraisers on Facebook and Instagram. Over half of those donations were under \$25.

### Facts About COVID-19

To further limit the spread of misinformation, this week we are launching a dedicated section of the [COVID-19 Information Center](#) called Facts about COVID-19. It will debunk common myths that have been identified by the World Health Organization such as drinking bleach will prevent the coronavirus or that taking hydroxychloroquine can prevent COVID-19. This is the latest step in our ongoing work to fight misinformation about the pandemic.



## Global Reminders to Wear Face Coverings

With the rise in COVID-19 cases in the US and in many other parts of the world, we are expanding our alerts reminding people to wear face coverings internationally as recommended by health authorities. These alerts have been running at the top of Facebook and Instagram in the US since early July. Starting this week, we will expand them to more countries globally.

### Update on July 2, 2020 at 9:00AM PT:

With the rise in COVID-19 cases in the US, we're putting an alert at the top of Facebook

and Instagram to remind everyone to wear face coverings and find more prevention tips from the CDC in our COVID-19 Information Center.



Update on June 24, 2020 at 5:00AM PT:

## Launching Summer of Support

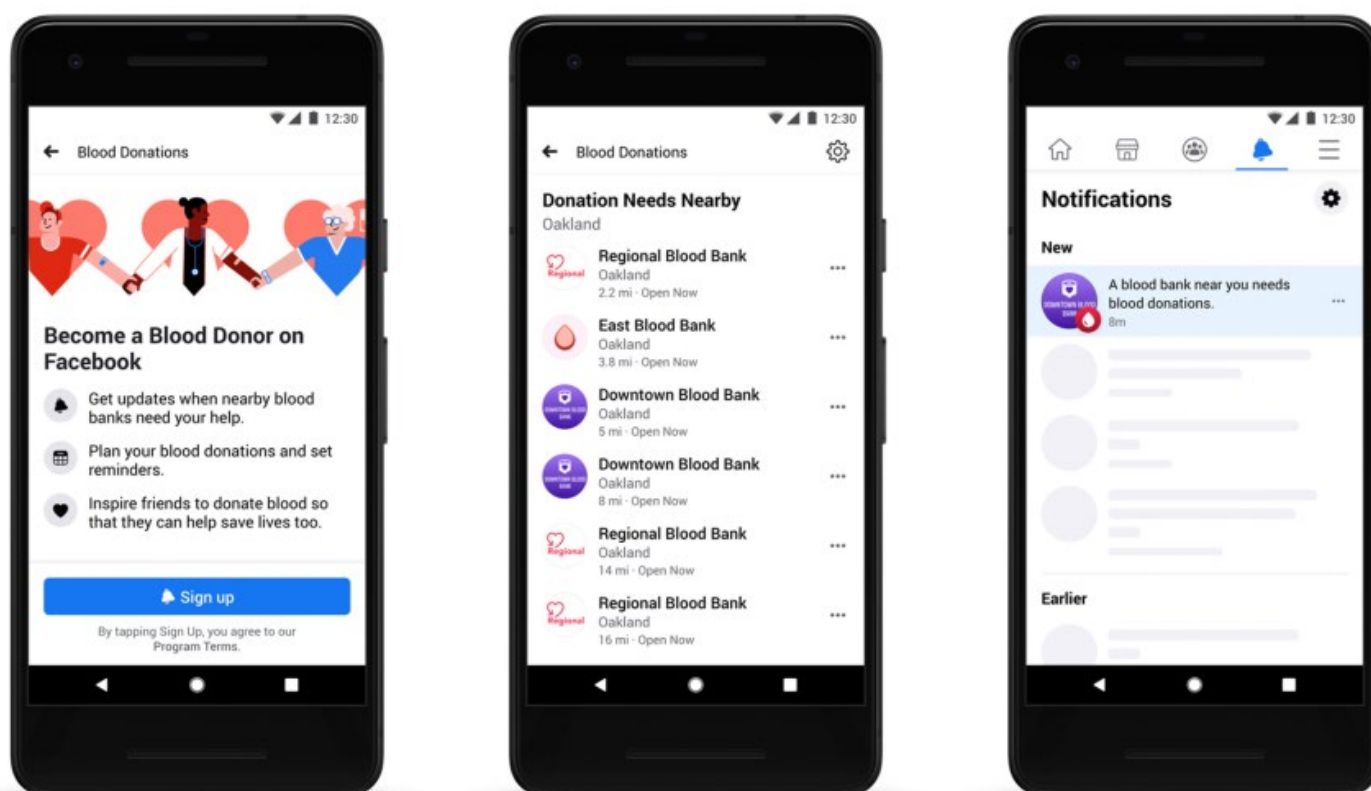
Over the past few months, many businesses have changed the way they operate, and many more are looking for ways to pivot and move forward. Today we're kicking off our Boost with Facebook Summer of Support program to help millions of people get training in the digital skills they need to succeed. Over the next six weeks, we'll offer free online

training, live sessions and conversations on topics such as reimagining customer support, transitioning from brick and mortar to digital, and more. You can learn more about Summer of Support and other ways we're supporting businesses [here](#).

Update on June 11, 2020 at 12:01AM PT:

## Expanding Our Blood Donations Feature

COVID-19 has led to blood shortages around the world due to shelter in place orders limiting the ability for people to donate. To help, we're expanding our Facebook [Blood Donations feature](#) to connect more people to their local blood banks, so they know when there is a shortage and where it is safe to donate. The Blood Donations feature is now available in South Africa, Senegal, Kenya, Burkina Faso, Côte d'Ivoire and Egypt as well as the US, India, Brazil, Pakistan and Bangladesh. We're also working with partners in India and Brazil to connect people with more local blood banks and hospitals through the Blood Donations feature. And in the US, we're excited to announce a new partnership with [AABB](#) to connect people to hospital blood banks.



**Update on June 10, 2020 at 10:05AM PT:**

## **Allowing the Promotion of Non-Medical Masks on Facebook and Instagram**

Since the World Health Organization declared COVID-19 a global pandemic, governments and authorities around the world have evolved their guidance on the need to wear masks. In March, we [temporarily banned ads and commerce listings for masks](#) on our apps to help protect against scams, misleading medical claims, medical supply shortages, inflated prices and hoarding. Since then, we've continued to monitor trends and activity around COVID-19 to better understand how people are using our platform and advertising tools during the pandemic.

Many health authorities now advise wearing non-medical masks – and in some places masks are required for activities like taking public transportation or visiting a store – and we've seen people and businesses of all sizes working to fill this need. So we're scaling back this temporary ban to allow people to promote and trade non-medical masks, including those that are homemade or handmade, in organic posts, ads and commerce listings on Facebook and Instagram. We will still maintain a temporary ban on selling medical masks, such as surgical or N95 masks, to prevent people from exploiting the pandemic for financial gain. You can learn more about how we define non-medical masks and advertiser restrictions for these ads [here](#).

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**Update on June 3, 2020 at 12:01AM PT:**

## **Releasing New Data for Good Tools**

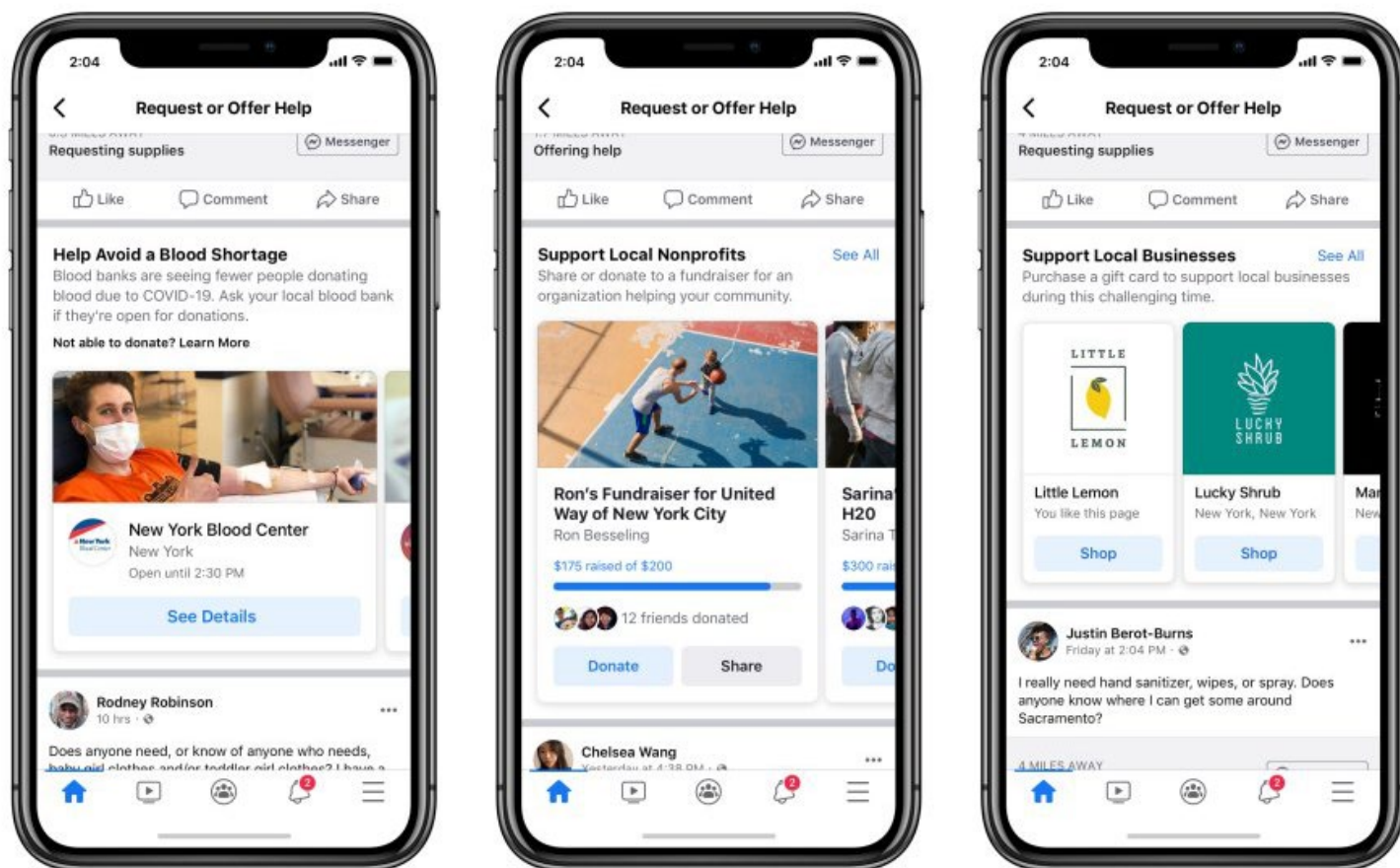
Today we're releasing new visualizations and datasets publicly to help researchers, NGOs and others combat the COVID-19 pandemic. You can learn more about these and our other Data for Good tools [here](#).

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**Update on May 4, 2020 at 9:38AM PT:**

Tomorrow on [#GivingTuesdayNow](#) we're expanding [Community Help](#) to make it easier for

people to support local businesses and nonprofits. Starting tomorrow, people will be able to find gift cards and vouchers to support local businesses, donate to local nonprofit fundraisers, sign up to become a blood donor and find local job opportunities — all in [Community Help](#).



Update on April 22, 2020 at 6:30AM PT:

## Partnering with ITDRC and NetHope to Address the Digital Divide

The coronavirus pandemic has underscored the importance of internet connectivity. While many people have shifted their lives online, there are still more than 3.5 billion people, including more than [18 million Americans](#), who lack reliable internet access. To help, we're partnering with the Information Technology Disaster Resource Center (ITDRC) and NetHope to provide internet connectivity to communities most impacted by COVID-19. The goal of these partnerships is to better understand the unique barriers these communities face in getting online and create the programs and infrastructure needed to increase the availability and affordability of high-quality internet access.

- We're providing a \$2 million grant to support ITDRC's [projectConnect](#) initiative which will help rural and underserved communities in the US gain access to the internet. We're also sharing insights from Facebook Disease Prevention Maps to help ITDRC better understand options for internet coverage in specific regions and more quickly determine the type of support needed to address connectivity challenges.
- We're providing a \$260,000 grant to support [NetHope's](#) COVID-19 response. In addition, through sharing our Disease Prevention Maps, we'll help NetHope identify the world's most vulnerable and affected communities, including migrants and refugees, in order to provide them with protective health equipment and internet connectivity kits.

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**Update on April 21, 2020 at 3:30PM PT:**

## **Update on Content Review Work**

Throughout the COVID-19 crisis, we've worked to keep both our workforce and the people who use our platforms safe. Last month [we announced](#) that we would temporarily send our content reviewers home. Since then we've shared updates on changes we've made to keep our platform safe during this time, including increasing the use of automation, carefully prioritizing user reports, and temporarily altering our appeals process.

We've also asked some of our full-time employees to review content related to real-world harm like child safety and suicide and self-injury. It's become clear in recent weeks that our offices are unlikely to return to business as usual in the near future. Some of our full-time employees will continue to review sensitive content, but [as Mark referenced last week](#) we will begin working with our partners to bring a small number of content reviewers back to offices to support these efforts in the coming weeks.

Returning to the office will be voluntary. We'll also work with our partners to put protections in place to keep content reviewers safe. These will include: greatly reducing building capacity in these offices to ensure government guidelines on physical distancing can be observed, implementing strict cleaning protocols and providing personal protective equipment like masks and gloves as well as temperature checks at the beginning of every shift.

As the situation evolves, we'll continue to share changes we make to keep both our community and the people who review content on our platforms safe.

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**Update on April 20, 2020 at 1:00PM PT:**

### **Facebook Joins Open COVID Patent Pledge**

Today Facebook joined Amazon, Hewlett Packard, IBM, and Microsoft in signing the [Open COVID Patent Pledge](#) to help make patents freely available in the fight against COVID-19. The pledge allows people to use [our patents](#) to advance innovation that may help in ending the COVID-19 pandemic and minimizing the impact of the disease — without any uncertainty around intellectual property rights or fear of litigation.

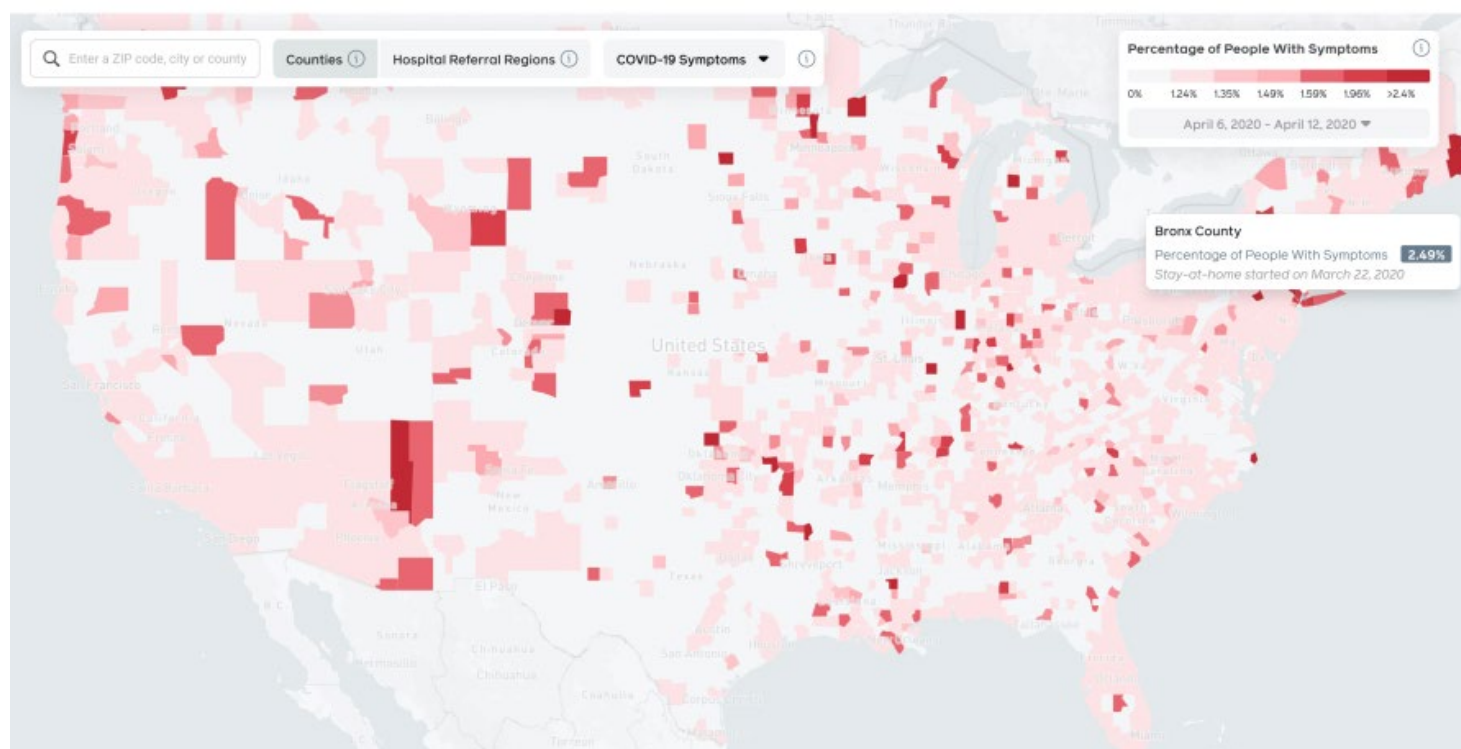
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**Update on April 20, 2020 at 3:15AM PT:**

### **Sharing COVID-19 Symptom Maps and Expanding Survey Globally to Help Predict Disease Spread**

Today Carnegie Mellon University (CMU) Delphi Research Center made public the [initial results](#) of their US symptom survey we [promoted on Facebook](#). Using aggregate data from Carnegie Mellon, Facebook produced its first report and [new interactive maps](#), which we plan to update daily through this outbreak. Mark Zuckerberg wrote in the [Washington Post](#) about how surveys like this can be an important tool in fighting COVID-19 and announced that we're working with faculty from the University of Maryland to expand the program globally.

## Facebook & Carnegie Mellon University COVID-19 Symptom Map



Update on April 16, 2020 at 10:55AM PT:

### Limiting the Spread of COVID-19 Misinformation

Today we shared some [additional steps](#) we're taking to combat COVID-19 related misinformation and make sure people have the accurate information they need to stay safe.

Update on April 15, 2020 at 8:08AM PT:

### Making It Easier to Support Businesses on Instagram

We're making it easier for people to support the businesses they love through gift cards, online food orders and fundraisers all on Instagram. [Learn more](#).



Update on April 14, 2020 at 2:05PM PT:

## Getting Expert Insights on How We Can Safely Re-Open Society

Mark Zuckerberg and Priscilla Chan are live with Dr. Tom Frieden, the former director of the CDC and founder of Resolve to Save Lives. They'll discuss how we can contain the spread of COVID-19 and how we should approach reopening society.



Live with Priscilla and Dr. Tom Frieden, the former director of the CDC, to talk about h...  
Mark Zuckerberg was Live






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**Update on April 14, 2020 at 12:05PM PT:**

## **Helping the WHO Share Timely Information on Messenger**

Today the World Health Organization (WHO) launched an interactive experience on Messenger to provide accurate and timely information about the coronavirus outbreak. People will now be able to [message the WHO](#) with questions about COVID-19 and get quick answers for free. The WHO created this Messenger experience with support from [Sprinklr](#) as part of the [program](#) we recently announced to pair developer partners with health organizations to help them connect with people and deliver critical information during the COVID-19 outbreak. [Learn more.](#)

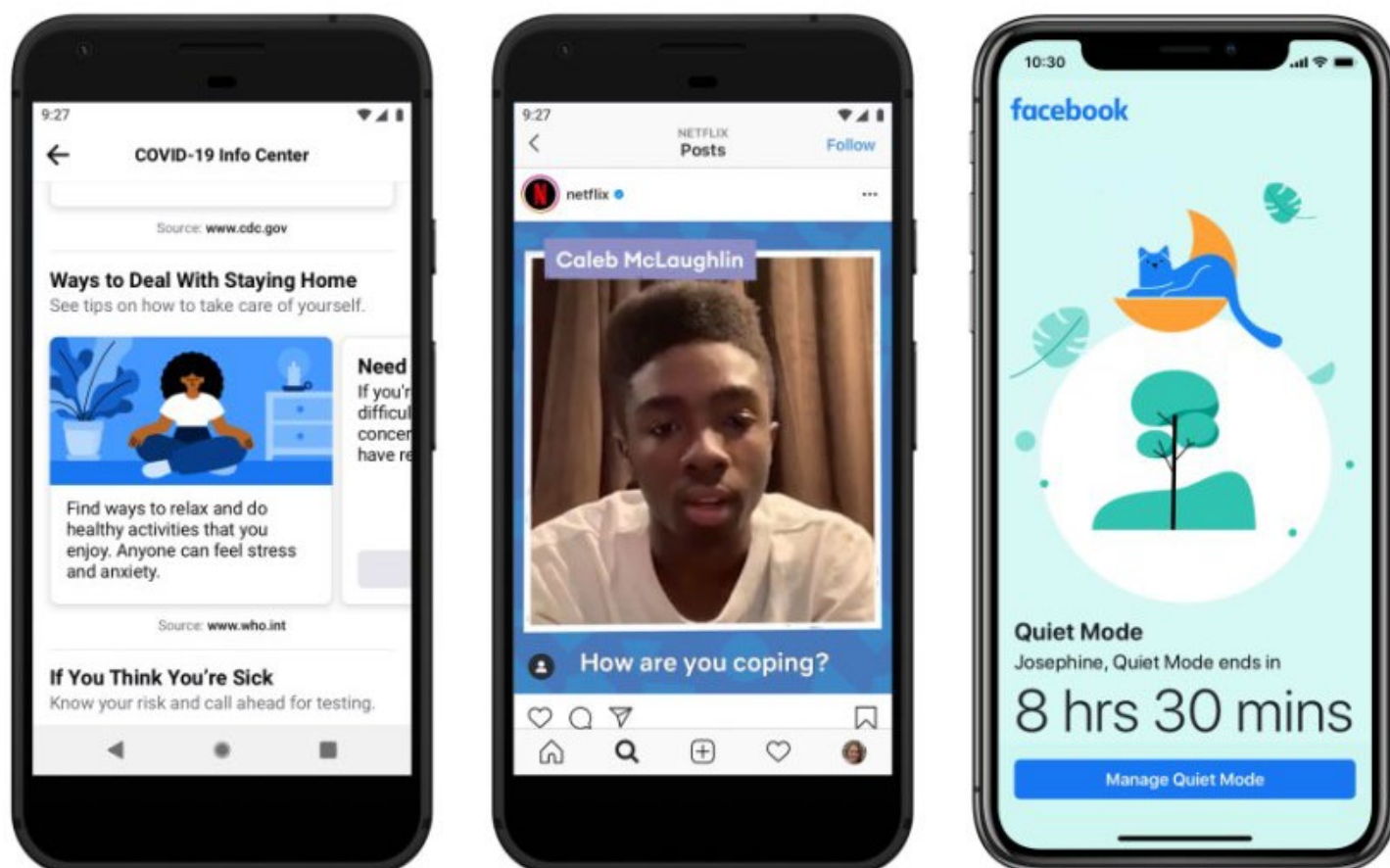
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**Update on April 9, 2020 at 2:15PM PT:**

## **Connecting People to Well-Being Tips and Resources**

The COVID-19 pandemic has forced people around the world to adjust to new routines, cope with loneliness, job loss, grief and more. And it's tough for all of us in different ways, not just physically but mentally. To help, we're sharing tips from experts to stay well, supporting the work of mental health organizations, and giving you tools to manage your time on Facebook.

- **Tips and Resources:** We're sharing tips from the World Health Organization (WHO) on how people can take care of themselves, stay active, relieve stress, and establish new goals and routines while staying home. We'll also connect people to their local crisis hotline, so people can call or text to get help when they need it. These tips and resources will be available in the Coronavirus Information Center on Facebook starting today, and we'll also share similar well-being tips on [@Instagram](#) from the National Alliance on Mental Illness ([NAMI](#)).
- **Mental Health Live Series:** We're encouraging people to tune in to an Instagram Live series from [@Netflix](#) called "Wanna Talk About It?" Stars will pair up with experts from organizations like the American Foundation for Suicide Prevention, NAMI, Crisis Text Line, The Trevor Project, Mental Health America and more to discuss how they're coping during this time as well as ways to handle anxiety, stress and feelings of isolation while social distancing. We're also working on an Instagram Live series with NAMI to encourage conversations about mental health and promote activities to help people stay well.
- **Supporting Crisis Helplines:** We're donating \$2 million to support organizations like [Vibrant Emotional Health](#) that operates the National Suicide Prevention Lifeline in the US, [Kids Help Phone](#) in Canada, [iCALL Psychosocial Helpline](#) in India, [Samaritans](#) in the UK, [Centro de Valorização da Vida](#) in Brazil and more. These organizations offer critical support for people struggling with loneliness, anxiety and other mental health issues and we want to help them increase capacity quickly during this time.
- **Tools to Manage Your Time:** As we all adjust to new routines and staying home, setting boundaries for how you spend your time online can be helpful. Whether it's to help you focus on your family and friends, sleep without distraction or manage how you spend your time at home, we have tools that can help you find the right balance for how you use Facebook. We added Quiet Mode, which mutes most push notifications, and if you try to open Facebook while in Quiet Mode, you'll be reminded that you set this time aside to limit your time in the app. We also added shortcuts to Notification Settings and News Feed Preferences, so you can make the most of your time on Facebook by controlling the type of posts you see in your News Feed as well as the updates you receive.



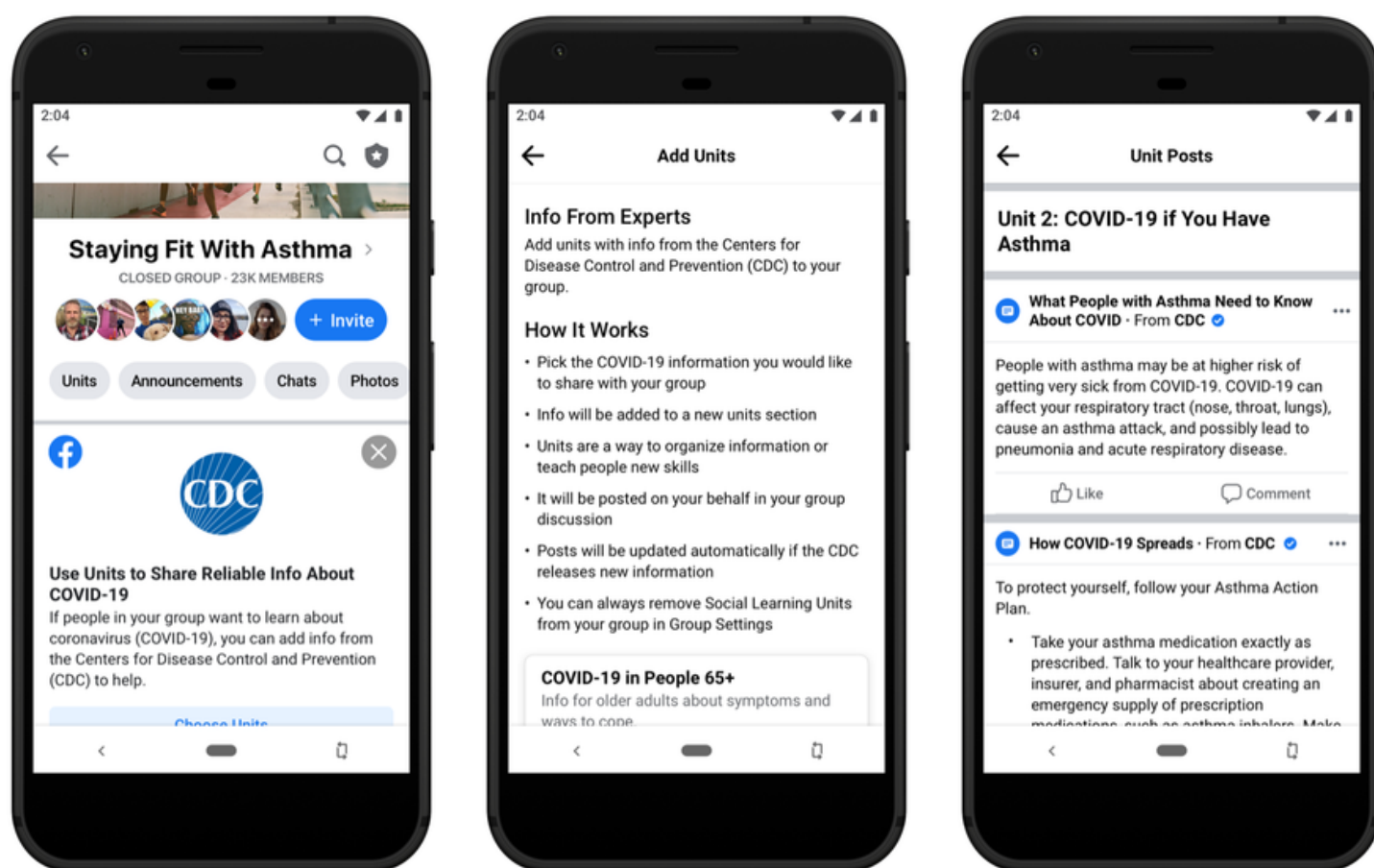
Update on April 7, 2020 at 1:00PM PT:

## Helping People Get Reliable Information In Groups and Local Alerts

As people are turning to Groups to connect with communities they care about and get support during this time, we want to make it easy to find and share reliable information in groups. Here are a few things we're doing:

- We show members of COVID-19 related groups an educational pop-up directing them to credible information from health organizations. This is similar to the messages we show in News Feed and in Search when you look for COVID-19 related content.
- We prompt group admins to share Live broadcasts about COVID-19 from health authorities like the Centers for Disease Control and Prevention (CDC) and the World Health Organization (WHO) as well as official state and country health departments.
- We partnered with the CDC to develop a curriculum in our [learning units tool](#) that group admins can share with members to help them learn how to stay safe during the COVID-19 outbreak and

prevent the spread of the disease.



In addition, we more than doubled the number of state and local governments and health agencies onboarded to [Facebook local alerts](#), so we now have more than 2,000 partners using the tool to communicate timely information to their communities.

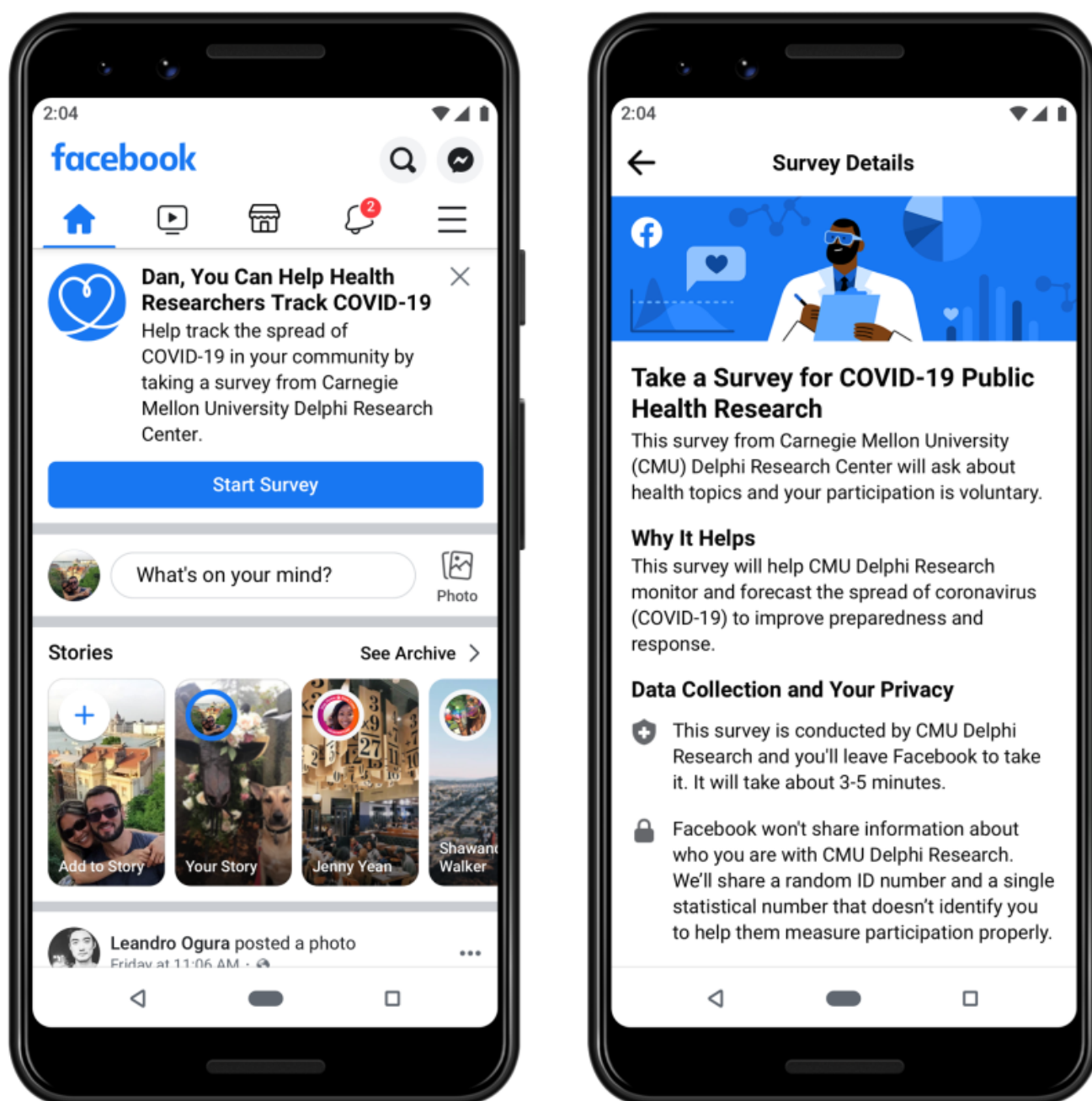
Update on April 6, 2020 at 12:00PM PT:

## New Tools to Help Health Researchers Track and Combat COVID-19

Today we're [announcing](#) new Data for Good tools to support health researchers and nonprofits:

- Three new types of Disease Prevention Maps to help inform disease forecasting efforts and protective measures, using aggregated data to protect people's privacy
- A prompt on Facebook encouraging people in the US to participate in a voluntary survey from Carnegie Mellon University Delphi Research Center designed to help health researchers identify

COVID-19 hotspots earlier



Update on April 2, 2020 at 4:25PM PT:

## Helping Small Businesses

Today we're sharing an update on our efforts to help small businesses get through this

challenging time. These include:

- **Updates to Our \$100 Million Small Business Grants Program:** We will give \$40 million in the US, which will provide grants to 10,000 businesses. We're working with Ureeka, a third-party partner to distribute these grants starting in the 34 locations where our employees live and work. Businesses can go to [facebook.com/grantsforbusiness](https://facebook.com/grantsforbusiness) to see eligibility criteria, and applications will open in the US next week.
- **Gift Cards:** We're making it easier for people to support their favorite local businesses with digital gift cards on Facebook, which are beginning to roll out today in the US. People will see the option to support local businesses with digital gift cards in their News Feed. Businesses interested in promoting their gift cards can [learn how to sign up](#) with one of our partners. We're also working on offering gift cards on Instagram.
- **Fundraising:** Starting today, business owners can [create a personal fundraiser on Facebook](#) for their business and ask customers for support during this critical time.
- **Temporary Service Changes:** To help businesses inform their customers about temporary changes, like different operating hours or delivery options during this time, we're making it possible for businesses to announce [temporary service changes](#) on their Facebook Page and in searches on Facebook.



Sheryl Sandberg   
about 11 months ago



The COVID-19 pandemic has hit small businesses everywhere. Suddenly and, through no fault of their own, many simply can't do business, and for others it has become much, much harder because customers are doing the right thing and staying at home.

Facebook is committed to helping them. That's why we recently announced our \$100 million global small business grant program and why we are providing more details today about how businesses can apply, when we will start accepting app...

[See More](#)



FACEBOOK.COM

**Our Continued Support for Businesses Through the Coronavirus Outbreak**

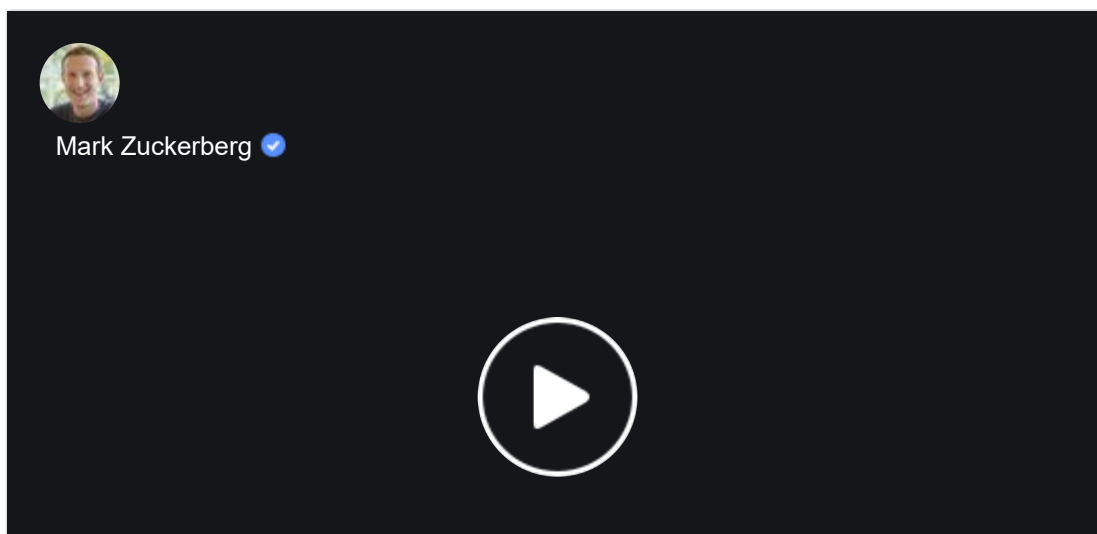
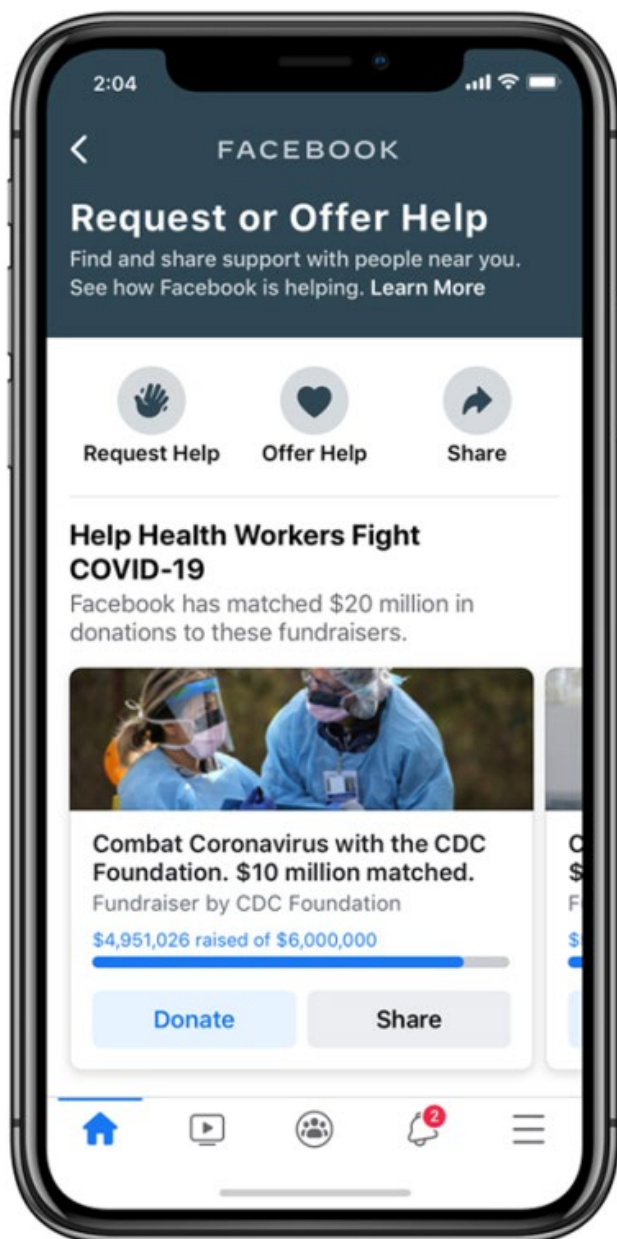
Facebook is continuing to support small businesses through the COVID-19 pande...

👍 654    💬 100    ➦ 204

**Update on March 31, 2020 at 12:15PM PT:**

## **Making It Easier for People to Request or Offer Help in Their Communities**

Today we're announcing Community Help, a place for people to request or offer help to neighbors, such as volunteering to deliver groceries or donating to a local food pantry or fundraiser. You can access Community Help in the COVID-19 Information Center on Facebook or by visiting [facebook.com/covidsupport](https://facebook.com/covidsupport). We're starting to roll it out in the US, the UK, France, Australia and Canada in the next few days, and we're working to bring it to more countries in the coming weeks.





We made a short film "Never Lost" to honor the solidarity and resilience of so many people coming together during this time. Thank you to everyone doing your part. If you need help or can offer it, please visit [facebook.com/covidsupport](https://facebook.com/covidsupport)

👍 40K    💬 4.3K    ➦ 11K

**Update on March 30, 2020 at 1:40PM PT:**

## Donating \$25 Million to Support Healthcare Workers

Mark Zuckerberg and Priscilla Chan are live with Governor Gavin Newsom to talk about California's response to the COVID-19 outbreak. They'll discuss the urgent need for more healthcare workers and Facebook's \$25 million donation to help support healthcare workers on the front line.



Live with Governor Newsom and Priscilla to talk about California's response to the CO...  
Mark Zuckerberg was Live




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**Update on March 30, 2020 at 6:00AM PT:**

## **Investing \$100 Million in the News Industry**

The news industry is working under extraordinary conditions to keep people informed during the COVID-19 pandemic. Today we're [announcing](#) an additional \$100-million investment to support journalists — including \$25 million in emergency grant funding for local news through the Facebook Journalism Project, and an extra \$75 million in marketing to get money to publishers around the world at a time when their advertising revenue is declining.

This investment is in addition to the support we've already pledged to the news industry in response to COVID-19: [\\$1 million in grants](#) for local news, [\\$1 million in grants](#) for fact-checking organizations, and a [\\$1-million donation](#) to the International Fact-Checking Network.

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**Update on March 26, 2020 at 1:00PM PT:**

## **Launching the Messenger Coronavirus Community Hub**

Today, we're launching the [Messenger Coronavirus Community Hub](#) with tips and resources to keep people connected to their friends, family, colleagues and community, and prevent the spread of misinformation. It also includes advice on how to recognize and avoid scams and misinformation online. [Read more](#) about how you can use Messenger to stay connected and informed during this time.

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**Update on March 26, 2020 at 9:00AM PT:**

## **Helping Young People Safely Navigate the Internet**

Today we're launching our digital literacy program, [Get Digital](#), to provide lessons and resources to help young people develop the competencies and skills they need to more safely navigate the internet. These resources are designed to be used by educators and families both in the classroom and at home, but they've become even more important as young people spend more time on their devices while at home during the COVID-19 outbreak.

Get Digital will help young people learn how to:

- Stay safe online and protect their personal information
- Navigate content and information, and evaluate the trustworthiness of a source
- Build positive and inclusive communities online by being kind and respecting others
- Manage their health and wellbeing by learning how to monitor emotions and develop healthy habits for when to use technology

It will also help them discover how technology can be used for civic and political engagement. And it can help them develop digital skills, such as understanding algorithms, and explore programming and more to help prepare them for future careers in technology.

We're partnering with UNESCO, the International Society for Technology in Education

(ISTE), National PTA, and EVERFI to distribute our new digital literacy tools to parents and educators around the world. Lessons are drawn from the Youth and Media team at the Berkman Klein Center for Internet & Society at Harvard University, which has made them freely available worldwide under a Creative Commons license, and the Greater Good Science Center.

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**Update on March 26, 2020 at 7:15AM PT:**

### **Sharing Tips for People Working Remotely**

Remote work can be challenging whether you're balancing caregiving and work, trying to lead a dispersed team, or adjusting to a new routine and responsibilities. That's why we created an online resource with tips to help our global team stay connected, be productive and do their best work, wherever they're working. We're sharing it publicly today in case it's helpful to others as many adjust to working remotely during this challenging time. Check out our [remote work resources](#).

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**Update on March 25, 2020 at 9:57AM PT:**

### **Combating COVID-19 Misinformation Across Our Apps**

Today we shared an [overview](#) of how we're connecting people to reliable information and taking aggressive steps to combat COVID-19 misinformation across our apps.

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**Update on March 24, 2020 at 1:30PM PT:**

### **Keeping Our Apps Stable and Reliable**

As more people around the world are physically distancing themselves from others, we've seen people using our apps more than ever. Today, we shared some data to give context on [the load we're managing](#). Our apps were built to withstand spikes, but the usage growth from COVID-19 is unprecedented across the industry. We're monitoring usage patterns

carefully, making our systems more efficient and adding capacity when needed, and we're doing everything we can to keep our apps stable and reliable during this time.

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**Update on March 24, 2020 at 6:00AM PT:**

## **Helping People Stay Informed and Connected on Instagram**

Today we announced [updates](#) to help people stay informed, safe and connected on Instagram during this challenging time. These include:

- Adding more educational resources in Instagram Search
  - Adding stickers to promote accurate information
  - Removing COVID-19 content and accounts from recommendations, unless posted by a credible health organization
  - Rolling out the donation sticker in more countries and helping people find relevant nonprofits to support
  - Creating a shared story to help those practicing social distancing connect with others, using a "Stay Home" sticker
  - Launching a new way to browse Instagram with friends over video chat
- 

**Update on March 23, 2020 at 12:01AM PT:**

## **Helping Government Health Organizations Use Messenger**

Today we're announcing two initiatives to help government health organizations in their response to the coronavirus outbreak using Messenger.

1. We're connecting government health organizations and UN health agencies with our developer partners who will help them use Messenger most effectively to scale their response to COVID-19. Our developer partners will provide their services for free, showing these critical organizations how to use Messenger to share timely information with local communities and speed up their replies to commonly asked questions with tools like automated responses.

- 
2. We're also starting an online hackathon and inviting developers to build messaging solutions that address issues related to the coronavirus such as social distancing and access to accurate information. Participants will receive unique access to Messenger tools and content as well as educational materials from Facebook to support their innovation. And the winners will get mentoring from Facebook engineers to help make their idea a reality.

[Read more](#) about how we're leveraging Messenger's reach, tools and technology to help people stay connected and informed during this time.

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**Update on March 20, 2020 at 2:45PM PT:**

### **Launching the WHO Health Alert on WhatsApp**

Today we launched the World Health Organization's Health Alert on WhatsApp. The [WHO Health Alert](#) is free to use and will answer common questions about COVID-19. It provides timely, reliable information about how to prevent the spread of the coronavirus as well as travel advice, coronavirus myth debunking and more. To [contact the WHO Health Alert](#), save the number +41 79 893 1892 in your phone contacts and then text the word 'Hi' in a WhatsApp message to get started. The service is initially launching in English but will be available in all six United Nations languages (English, Arabic, Chinese, French, Russian and Spanish) within the coming weeks.

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**Update on March 19, 2020 at 7:22PM PT:**

## **Keeping Our Platform Safe With Remote and Reduced Content Review**

We recently announced that we're temporarily sending content reviewers home. We want to make sure our platform remains a safe place for people to connect during this time, but with a reduced and remote workforce, below are some ways our content review processes will be impacted.

**Policy Enforcement:** We will continue to enforce our policies and prioritize preventing and disrupting harm across our platform. We are conducting human rights due diligence, looking at potential risks, and putting in place contingency plans that both prioritize the safety of our content reviewers and support the integrity of our platform. As Mark Zuckerberg discussed on [a press call](#), for example, we have shifted certain content review work to full time employees and are focusing on areas including child safety, terrorism, suicide and self-injury, and harmful content related to COVID-19.

Some contract reviewers will work from home, but with a reduced and remote workforce, we will now rely more on our automated systems to detect and remove violating content and disable accounts. As a result, we expect to make more mistakes, and reviews will take longer than normal, but we will continue to monitor how our systems are performing and make adjustments. In addition, reviewing content can be challenging, and working from home presents new obstacles in providing support to our teams, but we're working to ensure our content reviewers have the resources and help they need during this time.

**User Reports:** When people report content to us that they believe violates our policies, they will see a new message letting them know that we have fewer content reviewers available and will prioritize reported content that has the greatest potential to harm our community. This means some reports will not be reviewed as quickly as they used to be and we will not get to some reports at all.

**Appeals:** Normally when we remove content, we offer the person who posted it the option to request that we review the content again if they think we made a mistake. Now, given our reduced workforce, we'll give people the option to tell us that they disagree with our decision and we'll monitor that feedback to improve our accuracy, but we likely won't review content a second time.

We're working hard to minimize any impact on people as they use Facebook, Instagram and Messenger during this time, but we know some may feel this impact either when reporting content to us or appealing content we remove.

We're doing everything we can to keep our global teams and the community that uses our apps safe while continuing to provide the services people and businesses rely on.

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**Update on March 19, 2020 at 4:12PM PT:**

### **Getting Expert Health Tips and Information From Dr. Fauci**

Mark Zuckerberg is live with Dr. Anthony Fauci, America's top infectious disease expert involved in leading our government's response to COVID-19. They'll discuss how we can all help fight the spread of the coronavirus and what governments are doing to respond to the pandemic.



Mark Zuckerberg was Live



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**Update on March 19, 2020 at 2:18PM PT:**

### **Banning Ads for Hand Sanitizer, Disinfecting Wipes and COVID-19 Testing Kits**

In addition to masks, we're now also banning ads and commerce listings for hand sanitizer, surface disinfecting wipes and COVID-19 testing kits. And if we see people selling these products in organic posts on Facebook or Instagram, we'll remove them.

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**Update on March 18, 2020 at 6:01PM PT:**

## **Minimizing Disruptions for Businesses and Partners on Our Platform**

As we announced [on Monday](#), we're working with our partners to send home all contract workers who perform content review, until further notice. Since this includes people who review ads and monetized content, we wanted to share more about what this means for advertisers, publishers and creators that use our tools.

### **For Advertisers**

We use a combination of people and technology to review ads on Facebook and Instagram, and our automated systems already play a big role in that process. Now with a reduced and remote workforce, we're relying on automated technology even more. This may mean:

- Delayed review for ads and commerce listings
- An increase in ads being incorrectly disapproved
- Delayed or reduced appeals
- More limited availability of Facebook in-stream ads and lower delivery

### **For Content Creators and Publishers**

All monetized content goes through brand safety reviews. This includes Instant Articles and videos with in-stream ads. Since our ability to review new content is now limited, we won't be able to approve all content for monetization. We're working on how to support partners at this time.

As this situation continues to evolve, we may need to make further changes to our systems. While we're working to minimize disruptions for businesses and partners, we will inevitably make mistakes. We will do our best to address any issues as quickly as we can and continue to provide updates.

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**Update on March 18, 2020 at 2:30PM PT:**

## **Press Call Recap**

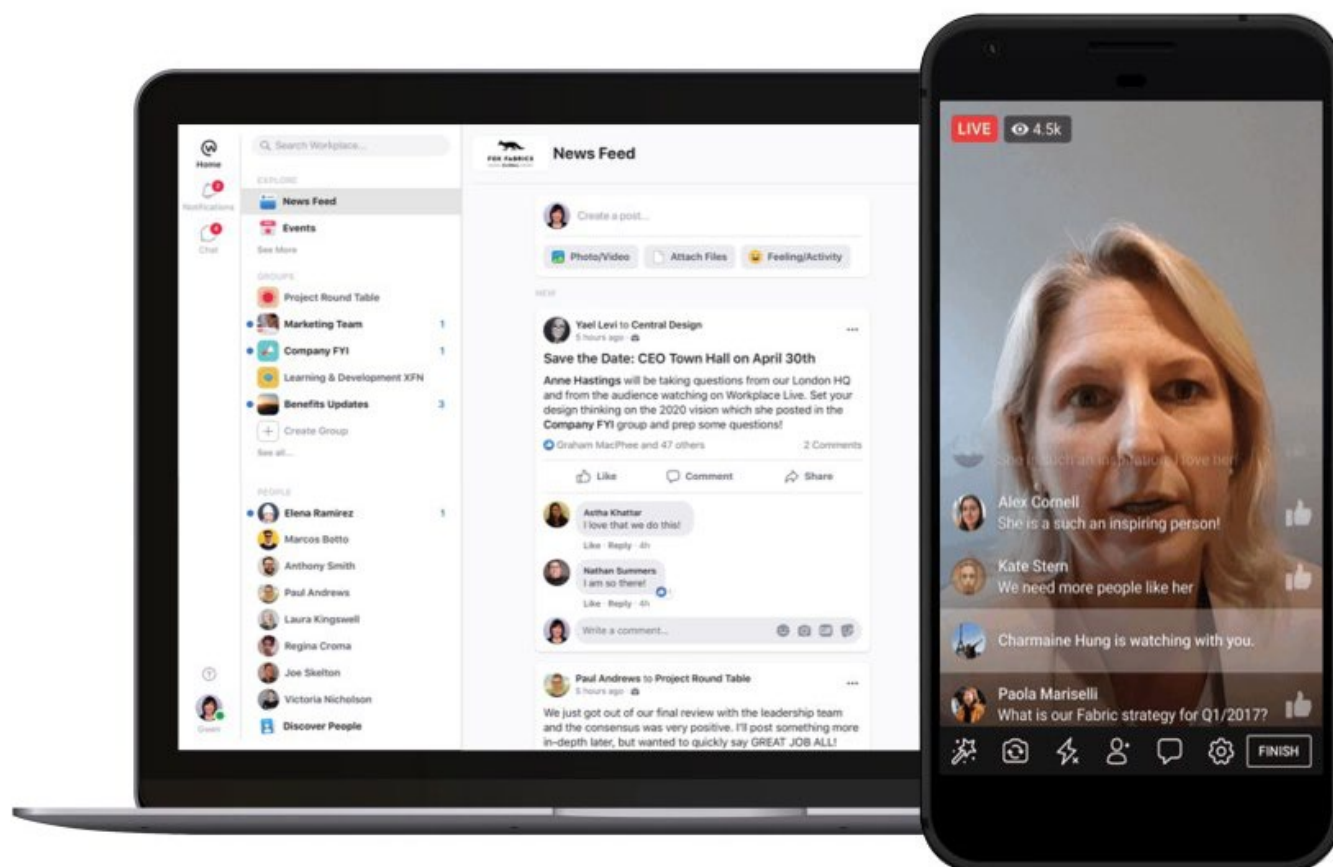
This morning on a press call, Mark Zuckerberg shared how we're supporting people and businesses affected by the coronavirus outbreak and how we're working with health authorities to make sure everyone can access accurate information. He also announced a new Coronavirus Information Center on Facebook to help people find information and tips, and he shared how we're giving governments and emergency services around the world free access to Workplace. Read the full [transcript from his press call](#).

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**Update on March 18, 2020 at 11:12AM PT:**

## **Offering Workplace to Government and Emergency Organizations for Free**

Starting today, we're offering Workplace Advanced to government agencies and emergency services free of charge for 12 months. These organizations play a vital role during the coronavirus outbreak, whether it's acting as first responders or coordinating public information. Workplace can help inform and connect their employees, allowing them to share critical information in real-time and enabling leadership to reach employees via live videos, posts and more. [Read more](#) about how we're supporting emergency services and government organizations during this time.



Update on March 18, 2020 at 11:06AM PT:

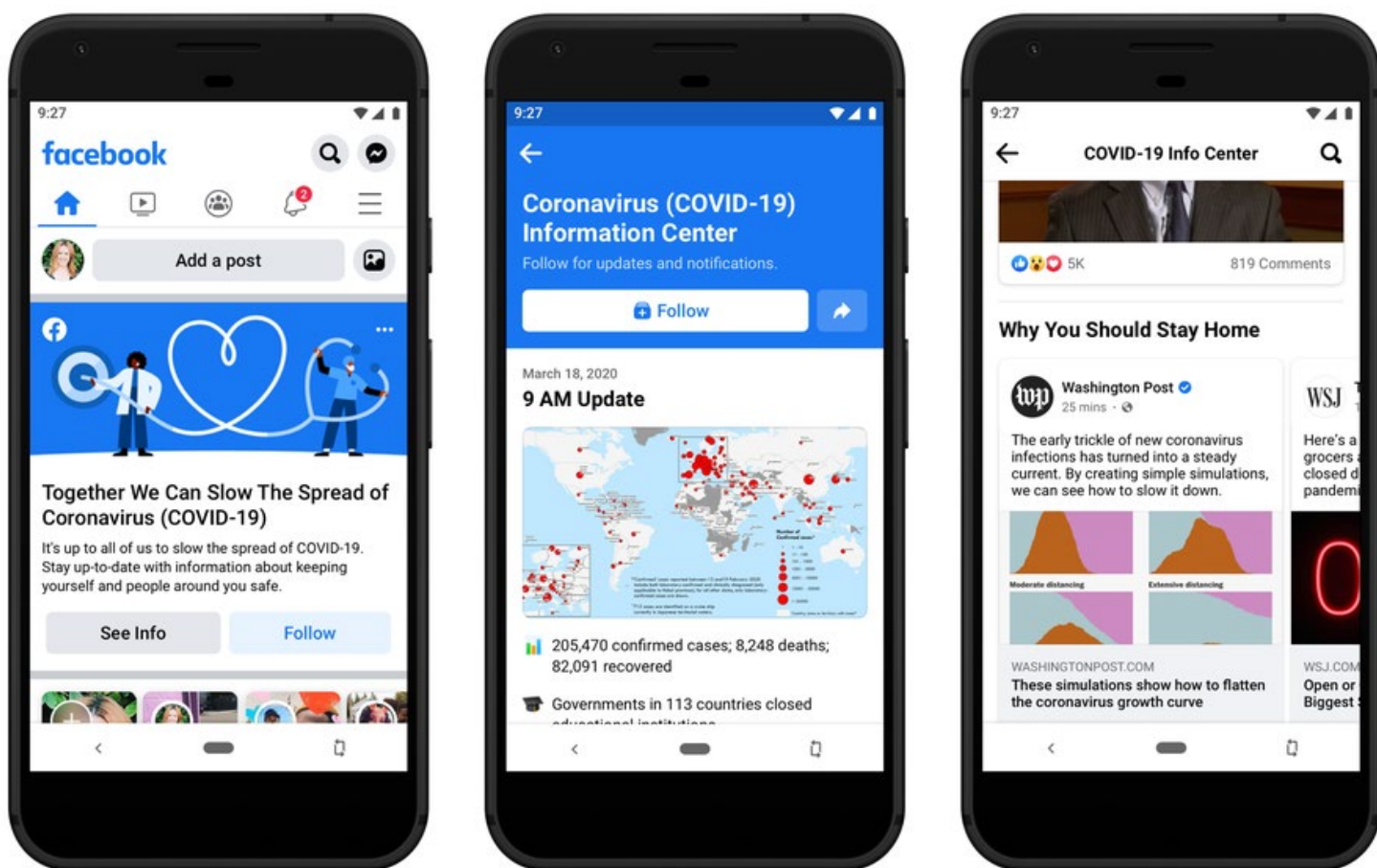
## Launching the Coronavirus Information Center on Facebook

Today we're announcing the Coronavirus (COVID-19) Information Center, featured at the top of News Feed, to provide a central place for people to get the latest news and information as well as resources and tips to stay healthy and support their family and community.

It includes real-time updates from national health authorities and global organizations such as the World Health Organization, as well as helpful articles, videos and posts about social distancing and preventing the spread of COVID-19.

People can also follow the Coronavirus Information Center to receive updates from health authorities directly in their News Feed. And starting in the US, people will see features to help them connect with local groups and ask for or offer help within their community.

We're rolling out the information center in Italy, France, Germany, Spain, the UK and the US within the next 24 hours, and we'll expand it to more countries in the coming days.



Update on March 18, 2020 at 7:56AM PT:

## Helping People Stay Connected Using WhatsApp

In these uncertain times, reliable communication is critical. That's why we've nearly doubled server capacity for WhatsApp and continue to see strong reliability as people place more voice and video calls around the world. In addition, today we launched an [information hub](#) with tips on how healthcare workers, educators and local businesses can stay connected using WhatsApp. We also donated \$1 million to the International Fact-Checking Network (IFCN) to expand the presence of local fact-checkers on WhatsApp.

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**Update on March 17, 2020 at 6:15AM PT:**

### **Supporting Fact-Checkers and Local News Organizations**

To support fact-checkers in their work around COVID-19, we're partnering with The International Fact-Checking Network (IFCN) to launch a [\\$1 million grant program](#) to increase their capacity during this time.

We're also supporting local news organizations as they deal with unexpected costs of covering COVID-19 and provide increased coverage during this time. To help, the Facebook Journalism Project is partnering with the Lenfest Institute for Journalism and the Local Media Association to offer a total of [\\$1 million in grants to local news organizations](#) covering COVID-19 in the US and Canada.

---

**Update on March 17, 2020 at 6:00AM PT:**

### **Investing \$100 Million in Small Businesses**

We're creating a \$100 million grant program to help small businesses around the world impacted by the coronavirus.



**Sheryl Sandberg** 

about 12 months ago



As the COVID-19 outbreak escalates, our focus has been on keeping people safe and informed by making sure everyone has accurate information, supporting global health experts and stopping misinformation. Our thoughts, like everyone's, are with our loved ones and our communities and all of those impacted around the world.

In recent weeks, we have seen inspiring examples of individuals and groups helping each other. People across the globe are stepping up, rising to the enormous...

[See More](#)



FACEBOOK.COM

**Facebook Small Business Grants Program**

Facebook is offering \$100M in cash grants and ad credit...

 1.9K
  552
  1.8K

**Update on March 16, 2020 at 8:46PM PT:**

## Keeping Our People and Our Platforms Safe

To keep our people safe, we recently requested that anyone who can work from home do so in all of our offices around the world. We are also continuing to take the necessary steps to keep our platform safe.

Over the past couple of years we've substantially scaled up our investments in safety and security, including by rapidly growing content review teams and expanding our machine learning capabilities. For both our full-time employees and contract workforce there is some work that cannot be done from home due to safety, privacy and legal reasons. We have taken precautions to protect our workers by cutting down the number of people in any given office, implementing recommended work from home globally, physically spreading people out at any given office and doing additional cleaning. Given the rapidly evolving public health concerns, we are taking additional steps to protect our teams and will be working with our partners over the course of this week to send all contract workers who perform

content review home, until further notice. We'll ensure that all workers are paid during this time.

We believe the investments we've made over the past three years have prepared us for this situation. With fewer people available for human review we'll continue to prioritize imminent harm and increase our reliance on proactive detection in other areas to remove violating content. We don't expect this to impact people using our platform in any noticeable way. That said, there may be some limitations to this approach and we may see some longer response times and make more mistakes as a result.

These are unprecedented times, but the safety and security of our platform will continue. We are grateful to all of our teams working hard to continue doing the essential work to keep our community safe.

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**Update on March 16, 2020 at 5PM PT:**

### **Working With Industry Partners**

Joint industry statement from Facebook, Google, LinkedIn, Microsoft, Reddit, Twitter and YouTube

"We are working closely together on COVID-19 response efforts. We're helping millions of people stay connected while also jointly combating fraud and misinformation about the virus, elevating authoritative content on our platforms, and sharing critical updates in coordination with government healthcare agencies around the world. We invite other companies to join us as we work to keep our communities healthy and safe."

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**Update on March 13, 2020 at 10:10AM PT:**

### **Matching \$20 Million in Donations to Support COVID-19 Relief Efforts**

We're matching \$20 million in donations to support COVID-19 relief efforts.



Mark Zuckerberg ✓

about a year ago



A lot of people have told us they want to help fight coronavirus but aren't sure how, so we've worked with the United Nations Foundation and the World Health Organization to start a COVID-19 Solidarity Response Fund, where anyone can go to make a donation.

Facebook is matching up to \$10 million in donations, and 100% of funds will directly support the work to prevent, detect and respond to the outbreak around the world. We'll also match \$10 million for the CDC Foundation, which will launch a fundraiser in the next few weeks focused on combating the outbreak here in the US.

Thanks to everyone who is working to minimize the impact of the pandemic. More to come soon.



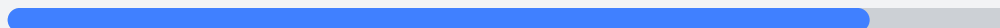
COVID-19 Fundraiser for WHO with up to \$10 Million Match

Fundraiser by United Nations Foundation ✓

Your donation to this Fundraiser will go further, thanks to Facebook's matching contribution of US\$10 million. G... [Continue Reading](#)

\$6,037,590 raised of \$7,000,000

Ended



👍 150K    💬 10K    ➦ 21K

Update on March 13, 2020 at 9:30AM PT:

Connecting People With Credible Health Information on Instagram

We shared updates on our efforts to support the Instagram community during this time.



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**Update on March 12, 2020 at 12:26PM PT:**

## **Supporting Businesses and Community Leaders**

To help people stay safe and informed during the COVID-19 outbreak, we're providing additional resources to our community. We shared a blog post on our [Community Hub](#) to provide accurate information on disease prevention and connect community leaders with tools to help them manage their community. We also created a [Business Resource Hub](#) that includes tips and trainings to help businesses navigate challenges during the COVID-19 outbreak and support their customers during this time.

## **Expanding Access to Facebook Local Alerts**

In addition, we're helping local governments and emergency response organizations more easily communicate with their communities. As COVID-19 has spread in the US, local governments have used Facebook to share critical information with their communities about this fast evolving situation. Because of the increasing need to get timely and accurate information to local communities, we're expanding access to Facebook local alerts to even more municipal governments, state and local emergency response organizations and law enforcement agencies. State and local public health agencies will now also have the ability to push out timely, accurate information to their local communities. And we'll provide additional [training to partners](#) as they start using local alerts to share best practices for using the tool most effectively.

Eligible organizations and government agencies can [request access to the local alerts tool here](#).

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**Update on March 6, 2020 at 6:25PM PT:**

## **Banning Ads and Commerce Listings for Medical Face Masks**

We are temporarily banning advertisements and commerce listings, like those on Marketplace, that sell medical face masks. We'll begin to enforce this change over the next few days. We already prohibit people from making health or medical claims related to the coronavirus in product listings on commerce surfaces, including those listings that guarantee a product will prevent someone from contracting it. We also have a dedicated channel for local governments to share listings they believe violate local laws. Our teams are monitoring the COVID-19 situation closely and will make necessary updates to our policies if we see people trying to exploit this public health emergency.

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**Update on March 6, 2020 at 10:52AM PT:**

### **Removing COVID-19 Misinformation on Instagram**

Today we shared updates about the changes we've made to keep the Instagram community safe and informed on COVID-19.




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**Update on March 3, 2020 at 7:05PM PT:**

## **Supporting Global Health Organizations With Free Ads and More**

CEO Mark Zuckerberg posted about the latest steps Facebook is taking.



Mark Zuckerberg   
about a year ago



I wanted to share an update on the steps we're taking to respond to the coronavirus. This is now a global challenge and we've spent the past month working with health authorities to coordinate our response.

We're focused on making sure everyone can access credible and accurate information. This is critical in any emergency, but it's especially important when there are precautions you can take to reduce the risk of infection. If you search for coronavirus on Facebook, you'll ... [See More](#)

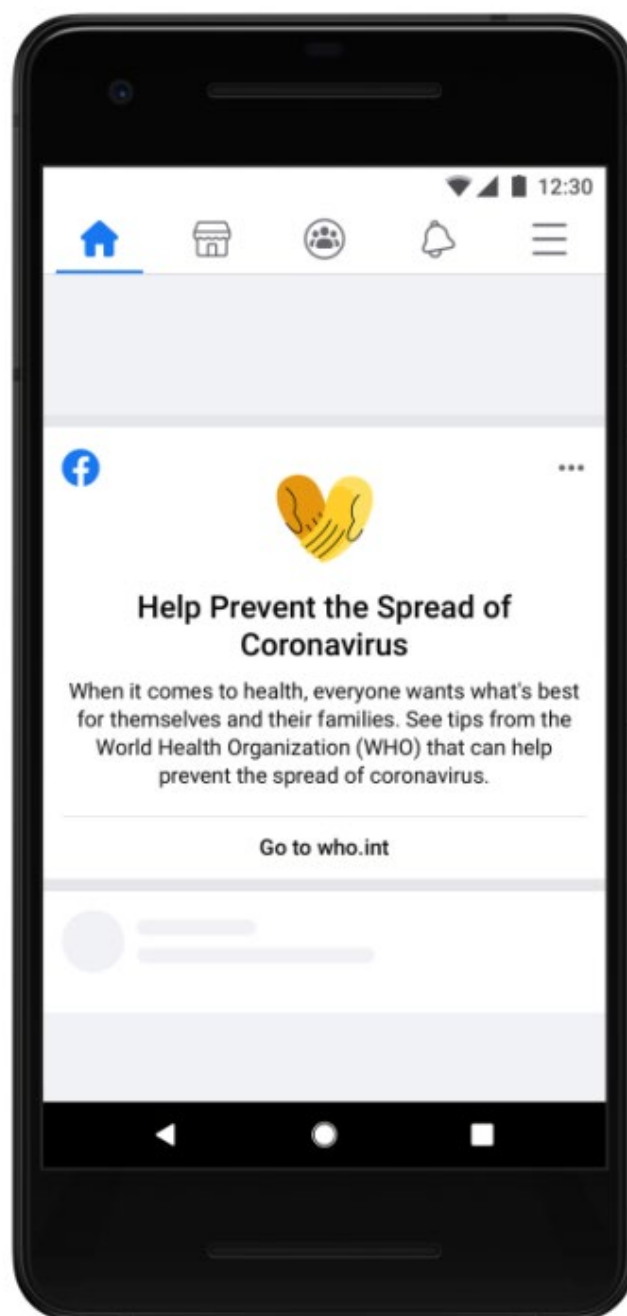
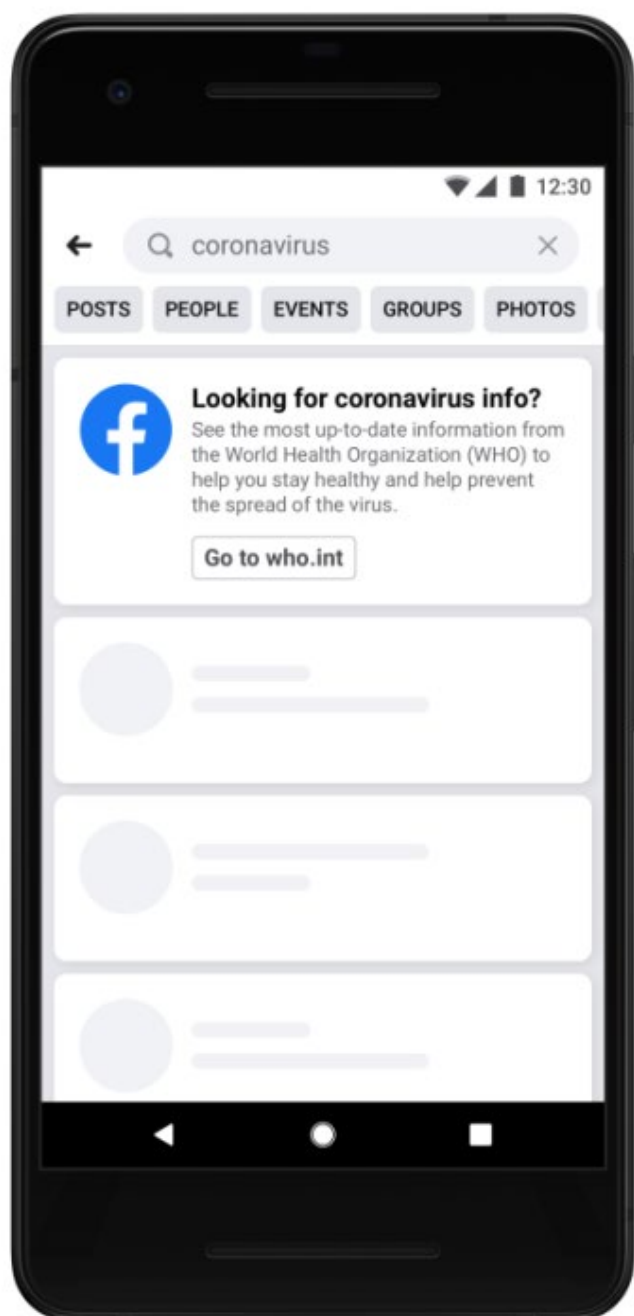
 110K  9.1K  11K

### Update on February 26, 2020 at 7:13PM PT:

As world health officials issue new guidance and warnings about coronavirus (COVID-19), we're continuing our work to connect people to information from regional and local health organizations and limit the spread of misinformation and harmful content about the virus.

### Connecting People to Accurate Information and Helpful Resources

Anyone who searches for information related to the virus on Facebook is shown educational pop-ups on top of search results connecting them to expert health organizations including the World Health Organization (WHO). We've launched these globally over the last few weeks in all languages on Facebook, directing people to the WHO. In several countries we are directing people to their local ministry of health. For example, in the US we are directing people to information from the Centers for Disease Control and Prevention (CDC) and in Singapore, we're directing people to the Singapore Ministry of Health. Moreover, in countries where the WHO has reported person-to-person transmission and deaths, we've shown additional messages to people toward the top of News Feed with more information.



## Exploitative Tactics in Ads

Yesterday we put a new policy into effect to protect people from those trying to exploit this emergency for financial gain. This means we are now prohibiting ads for products that refer to the coronavirus in ways intended to create a panic or imply that their products guarantee a cure or prevent people from contracting it. For example, ads for face masks that imply they are the only ones still available or claim that they are guaranteed to prevent the virus from spreading will not be allowed to run on our platforms.

Originally published on January 30, 2020 at 5:40PM PT:

Today, the World Health Organization (WHO) declared the coronavirus a public health emergency of international concern. As the global public health community works to keep people safe, Facebook is supporting their work in several ways, most especially by working to limit the spread of misinformation and harmful content about the virus and connecting people to helpful information. Here are some specific steps we are taking.

## Limiting Misinformation and Harmful Content

Our global network of third-party fact-checkers are continuing their work reviewing content and debunking false claims that are spreading related to the coronavirus. When they rate information as false, we limit its spread on Facebook and Instagram and show people accurate information from these partners. We also send notifications to people who already shared or are trying to share this content to alert them that it's been fact-checked.

We will also start to remove content with false claims or conspiracy theories that have been flagged by leading global health organizations and local health authorities that could cause harm to people who believe them. We are doing this as an extension of our existing policies to remove content that could cause physical harm. We're focusing on claims that are designed to discourage treatment or taking appropriate precautions. This includes claims related to false cures or prevention methods — like drinking bleach cures the coronavirus — or claims that create confusion about health resources that are available. We will also block or restrict hashtags used to spread misinformation on Instagram, and are conducting proactive sweeps to find and remove as much of this content as we can.

## Providing Helpful Information and Support

Our platforms are already being used to help people connect with accurate information about the situation, including from global and regional health organizations. We've been closely coordinating with leading health organizations to make this easier and more accessible for people using Facebook and Instagram.

For example, we will help people get relevant and up-to-date information from partners through messages on top of News Feed on Facebook; these will be deployed based on

guidance from the WHO. When people search for information related to the virus on Facebook or tap a related hashtag on Instagram, we will surface an educational pop-up with credible information. We have also provided free advertising credits to enable organizations to run coronavirus education campaigns on Facebook and Instagram in affected regions and are discussing ways to provide additional assistance and support to health authorities.

## Empowering Partners with Data Tools

We are empowering leading researchers at Harvard University's School of Public Health and National Tsing Hua University in Taiwan by sharing aggregated and anonymized mobility data and high resolution population density maps to help inform their forecasting models for the spread of the virus as part of our broader Data for Good program. We may expand these efforts to a broader set of partners in the coming weeks. We are also helping partners understand how people are talking about the issue online through tools like CrowdTangle to better inform their efforts.

Not all of these steps are fully in place. It will take some time to roll them out across our platforms and step up our enforcement methods.

We will provide updates on additional steps we are taking in coordination with global and regional partners as the situation continues to evolve.

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**Categories:** Company News, Facebook, Integrity and Security, Safety and Expression

**Tags:** Combating Misinformation, COVID-19 Response, Data for Good, False News, Health

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We're running the largest worldwide campaign to

promote authoritative information about COVID-19 vaccines.

February 8, 2021

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

THE INFORMED CONSENT ACTION  
 NETWORK and DEL BIGTREE,

Plaintiffs,

v.

YOUTUBE LLC and FACEBOOK, INC.,

Defendants.

CASE NO.: 4:20-cv-09456-JST

**[PROPOSED] ORDER ON  
 DEFENDANTS' MOTION TO  
 DISMISS FIRST AMENDED  
 COMPLAINT**

**[PROPOSED] ORDER ON DEFENDANTS' MOTION TO DISMISS**

**PLAINTIFFS' FIRST AMENDED COMPLAINT**

Defendants' Motion to Dismiss the First Amended Complaint is GRANTED. Plaintiffs  
The Informed Consent Action Network and Del Bigtree's First Amended Complaint is  
DISMISSED WITH PREJUDICE in its entirety.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Jon S. Tigar  
United States District Judge