

No. 23-15858

**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

JUSTIN HART,
Plaintiff-Appellant

v.

META PLATFORMS, INC., F/K/A FACEBOOK, INC.; X CORP., SUCCESSOR IN INTEREST TO TWITTER, INC.; VIVEK MURTHY IN HIS OFFICIAL CAPACITY AS UNITED STATES SURGEON GENERAL; JOSEPH R. BIDEN, JR. IN HIS OFFICIAL CAPACITY AS PRESIDENT OF THE UNITED STATES; THE DEPARTMENT OF HEALTH AND HUMAN SERVICES; AND THE OFFICE OF MANAGEMENT AND BUDGET,
Defendants-Appellees

On Appeal from the United States District Court
for the Northern District of California

No. 3:22-cv-00737

Hon. Charles R. Breyer

**EXCERPTS OF RECORD
Volume 3 of 4**

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1 report with you courtesy of Lauren and Kelly on this
2 cc. They are providing these to WHO, thought it
3 helpful for CDC's teams as well." And then she says
4 what the time period of it is, and that these are
5 going to be biweekly.

6 What kind of information was in the
7 CrowdTangle? What did it provide you?

8 A. Well, I don't have a clear recollection of
9 the reports because I sent the reports to other
10 teams. But typically social media listening reports
11 show themes and -- of discussion on social media
12 channels.

13 Q. Okay. And so if you look down further
14 I'll just ask you again some words that I think I
15 know what they mean, but we might as well put on the
16 record.

17 (As read) Lauren, can you -- can do that
18 "distro."

19 That's distribution?

20 A. Yes.

21 Q. And "the full report is attached but some
22 highlights the CrowdTangle team would like to call
23 to your attention are: Top engaged COVID and
24 vaccine-related content overall across Pages and
25 Groups." And it says "largely a mix of educational

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1 posts, reports of successful vaccinations," and it
2 goes on. And then "news/commentary on COVID and
3 vaccination rollout."

4 So does this -- is this like an algorithm
5 that shows you where -- what people are talking
6 about?

7 A. I wouldn't characterize it as an
8 algorithm. But it's a search of content on social
9 media, and a summary of the higher volume
10 conversations. It's helpful for communicators to
11 know what is being discussed because it helps
12 improve our communication materials.

13 Q. All right. And then he says: "However,
14 posts falling into the following themes, all of
15 which have potential risks, also garnered high
16 engagement." And then he has reports of healthcare
17 workers refusing the vaccine; right?

18 A. Yes.

19 Q. And he says there was an article in Forbes
20 about it?

21 A. Yes.

22 Q. Posts about alleged vaccine-related
23 deaths?

24 A. Yes, I see that, too.

25 Q. And: "News and reports of severe vaccine

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1 side effects included both first- and secondhand
2 reports in Groups, with users sharing photos and
3 video."

4 Do you see that?

5 A. Yes.

6 Q. Why are these of concern to the CDC, if at
7 all?

8 MS. SNOW: Objection. Mischaracterizes
9 testimony, and the document.

10 BY MR. VECCHIONE:

11 Q. You can answer.

12 A. Well, this doesn't say that they were a
13 concern to CDC. They are providing a report of the
14 most talked about topics on social media during this
15 time period. But in general, as I mentioned before,
16 it does help for people to -- for communicators to
17 know what conversations occurs on social media
18 because it helps us identify gaps in knowledge, or
19 confusion, or things that we're not communicating
20 effectively that we need to adjust.

21 Q. All right. Again, pardon me -- but
22 secondhand reports and groups, groups are like the
23 travelers information groups; if I'm on Facebook I
24 can belong to various groups, and I get information
25 on that feed?

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1 A. Can you clarify what you're referring to
2 with groups?

3 Q. He says number 3 -- number -- well, in 1,
4 2 and 3 he uses the words "groups." In 1 he says:
5 Worker-centric groups, groups especially
6 anti-vaccination groups. And then in 3 he has
7 secondhand reports in groups. So I'm just asking
8 for the record --

9 A. Yeah.

10 Q. -- that if I am on Facebook I can belong
11 to various groups and get information that that
12 group gets?

13 A. I cannot -- I can't say for sure that this
14 report was about the Facebook groups, but it seems
15 likely that that's what that is reference to and you
16 are describing them correctly.

17 Q. Thank you. And then he tells -- you tell
18 in the next -- in January 26th you write to
19 Ms. Theme and you say -- you say: "It looks
20 wonderful and much appreciated," and then send, send
21 them to you. It says: "One group we'll be adding
22 is the Census group who hopefully will soon start
23 their project."

24 "Also, the wide group of those looking at
25 misinfo will want this."

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1 **First, what's the Census group within CDC?**

2 **Or is that not within CDC? What is that, Census**
3 **group?**

4 A. This is the Census Bureau.

5 **Q. Okay. And they would be on this CDC list?**

6 A. It appears I was suggesting that, yes.

7 **Q. Okay. And then who's the wide group of**
8 **those looking at -- well, first let's go back.**

9 **Misinfo is misinformation?**

10 A. Yes.

11 **Q. Who's the wide group of those looking at**
12 **misinformation?**

13 A. I don't know specifically what I was
14 referring to there.

15 **Q. Do you know generally?**

16 A. I suspect that it was probably people
17 working on communication materials or developing
18 reports about gaps and areas of confusion.

19 **Q. Okay. Do you have notes or other records**
20 **of the phone call he refers -- she refers to: "I'm**
21 **following up on our conversation several weeks ago"?**

22 A. I doubt I have notes.

23 **Q. Okay.**

24 A. If I did, they would have been electronic.

25 **Q. Do you know who took part in the**

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1 **conversation?**

2 A. I don't know. But typically I was on the
3 call, sometimes Jay was as well, Jay Dempsey. But I
4 don't recall the specific meeting.

5 **Q. Did you instruct Ms. Theme or anyone else**
6 **at Facebook to do anything with the biweekly reports**
7 **other than send them to you?**

8 MS. SNOW: Objection. Mischaracterizes
9 testimony.

10 BY MR. VECCHIONE:

11 **Q. You did ask Ms. Theme to send you the**
12 **biweekly reports, didn't you?**

13 A. She offered to send me the biweekly
14 reports, and I agreed that would be good.

15 **Q. Did you instruct her to do anything else**
16 **regarding the biweekly reports?**

17 A. Not that I recall.

18 **Q. Do you know who decided the reports would**
19 **be developed biweekly?**

20 A. I don't recall. But this email seems to
21 suggest that they were already doing biweekly ones.

22 **Q. For the -- for your purposes, what was the**
23 **purpose of the reports, receiving them?**

24 A. They would help us understand what was
25 being discussed on social media about COVID, which

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1 helps us look for gaps in information, confusion
2 about facts, things that we might need to adjust our
3 communication materials for.

4 **Q. Had you prior to this email discussed with**
5 **Ms. Theme such items as reports of healthcare**
6 **workers refusing the vaccine, posts about alleged**
7 **vaccine-related deaths, and news and reports of**
8 **severe vaccine side effects? Did you ever report to**
9 **her that those would be of interest to the CDC?**

10 A. I don't recall reporting or discussing
11 these with them specifically. I do recall generally
12 discussing misinformation with Facebook around this
13 time and --

14 **Q. And those could have been included within**
15 **that discussion?**

16 A. Possibly.

17 **Q. Why did you add Census to the distribution**
18 **of this?**

19 A. They were going to start working with the
20 CDC regarding misinformation.

21 **Q. So what did -- what did the wide group of**
22 **those looking at misinformation do with the reports?**

23 A. I don't know what they did with the
24 reports. However, I do know two things that were
25 likely done with the reports. We had -- we have

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1 part of our Joint Information Center in the
2 Emergency Response a research team that compiles all
3 the themes of discussion on news and social media.
4 And I know that they received these reports, and
5 they use a lot of sources to develop a summary for
6 the response for all the reasons I just described
7 about why this is helpful.

8 I believe at this time it was also part of
9 a publicly-available vaccine confidence report that
10 also looked across themes, what was being discussed,
11 and where areas of confusion were so that they could
12 update vaccine communication and other issues.
13 Those are posted on CDC's website.

14 **Q. Did you do anything with the reports**
15 **besides forward them on to Census and to this wide**
16 **group?**

17 A. Anything with the CrowdTangle reports, I
18 didn't personally do anything else with the
19 CrowdTangle reports.

20 **Q. Do you know if anyone else did anything**
21 **besides what you've described with the CrowdTangle**
22 **reports?**

23 A. I would assume that it was used by people
24 to look in background of conversations similar to
25 what I have described.

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1 MR. VECCHIONE: All right. You can put
2 that aside.

3 (Plaintiffs' Exhibit 7 marked.)

4 BY MR. VECCHIONE:

5 Q. All right. So what is the subject line of
6 this email chain?

7 A. "Crowd Tangle COVID-19 Reports."

8 Q. All right. Let's take a look at the
9 February 21, 2021, 8:39. Who is this from and who's
10 the recipient?

11 A. Kelly Perron at Facebook, and I'm the
12 recipient.

13 Q. All right. And we've discussed her
14 before. She was going to be one of the contacts
15 with CrowdTangle; right?

16 A. Yes.

17 Q. And what is the summary that Perron
18 reports?

19 A. She attached the report, which is not
20 here, but and then summarized the high points.

21 Q. Okay. And why is she reporting this to
22 you? Is this part of the biweekly report that you
23 agreed to earlier?

24 A. Yes.

25 Q. And this would be a summary of a report

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1 **that's probably attached, but it's not here?**

2 A. Correct.

3 **Q. All right. And what did you do with this**
4 **information?**

5 A. We created a mail group, and this was
6 forwarded on by -- I either forwarded it, or over
7 time I had an assistant that started forwarding
8 them.

9 **Q. All right. So the same groups within the**
10 **CDC and the Census we talked about before?**

11 A. At some point I recall adding Census to
12 the distro. I am sure by May or March there were
13 several time periods they were probably included.
14 The distribution list likely changed a bit because
15 people deployed into the response and out of the
16 response, but, yes.

17 **Q. Okay. Can you take a look at the emails**
18 **dated Tuesday, February 16 and 17th, 2021 at**
19 **9:00 p.m.?**

20 A. Yes.

21 **Q. So who is that from, and who is that to?**

22 A. That's Kelly Perron at Facebook to me.

23 **Q. And what is she summarizing here? What is**
24 **the summary that she reports?**

25 A. It's the -- it looks like the next

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1 biweekly report. And it looks attached, but it's
2 not in the exhibit. And she summarized it in the
3 body of the email.

4 **Q. All right. And she's highlighted, some**
5 **things are highlighted, right, in dark black?**

6 A. Some things are bolded.

7 **Q. Bolded. That's right. Reports of deaths**
8 **post-vaccination?**

9 A. Yes, that's in bold.

10 **Q. Double masking?**

11 A. Yes, that's bold.

12 **Q. And personal reports of vaccination?**

13 A. Yes, that's bold.

14 **Q. Why did she report this to you, those**
15 **highlights?**

16 A. There again, they are using CrowdTangle to
17 do a summary of the themes that are being discussed
18 on Facebook and Instagram channels, and this is a
19 summary of that.

20 **Q. Okay. And what did you do with this**
21 **information?**

22 A. As mentioned, we had a distribution list
23 that this was forwarded to.

24 **Q. You just sent it on?**

25 A. Mm-hmm (affirmative).

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1 **Q. Can you look at the email dated Monday**
2 **March 1st? And who is this to?**

3 A. Kelly at Facebook to me.

4 **Q. All right. And she added someone. She**
5 **says she added Chelsey Lepage at Facebook. Who is**
6 **that?**

7 A. I think that she may have been --

8 **Q. I'm cheating a little. I went above what**
9 **I told you to look at.**

10 A. Yes. I'm sorry. I see that now. But I
11 believe Chelsey was another assistant to Payton, I
12 think.

13 **Q. Okay. And then on the one I did direct**
14 **your attention to, March 1st at 5:47, again she says**
15 **Hi -- Kelly Perron says: Hi, Carol. And she**
16 **attached the latest CrowdTangle insights report for**
17 **February 10th to 24, and she says it's attached.**

18 A. Mm-hmm.

19 **Q. And then she does a summary. And there**
20 **again there are certain points she's bolded:**
21 **COVID-19 and mental health, vaccine refusal, testing**
22 **positive post-vaccination.**

23 **Do you know whether those were bolded**
24 **because those were of particular concern to the CDC?**

25 A. No. That's the format of all the reports.

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1 **Q. Okay. So bolding them was -- your**
2 **testimony is bolding them is not because they were**
3 **of particular interest to the CDC, that's just how**
4 **she did it?**

5 A. I really couldn't say what her thinking
6 was when she bolded them.

7 **Q. Okay. When you received it did you have**
8 **any understanding about the bolded portions?**

9 A. No.

10 **Q. Were the bolded portions things that you**
11 **had particularly spoken with Facebook before in your**
12 **telephone conversations?**

13 A. I don't believe so.

14 **Q. All right.**

15 A. Well, can I clarify that a little bit?

16 **Q. Yes, please.**

17 A. I'm sure -- I don't remember discussing
18 these in terms of the CrowdTangle report or the
19 things in bold. I am sure that general discussions
20 that there was a lot of information on vaccines,
21 which is one of the bolded words, for example. I am
22 sure that did occur.

23 **Q. Thank you. On March 15 Kelly sends you at**
24 **6:19 p.m.**

25 A. Yes.

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1 Q. Sort of goes over, she keeps Chelsey
2 Lepage in there, and then she -- this time she
3 summarizes slightly different items:
4 Post-vaccination guidelines and protocols, vaccine
5 ingredients and vaccine side effects.

6 A. I see that.

7 Q. And your testimony is the same as to why
8 they are bolded as before, as far as you know?

9 A. Correct.

10 Q. And you did the same thing with them as
11 you did before that you've testified?

12 A. I believe so, yes.

13 Q. Let's see. And then at the bottom of that
14 March 15, she says: This week we also are including
15 a one off content insights report we did looking at
16 Spanish language content relative to the U.S. we
17 thought might be interesting for you.

18 She asks you not to share it externally.

19 Do you recall any other times you got
20 Spanish language-specific material?

21 A. No. But I didn't recall this time either
22 until I read it.

23 Q. Okay. And then I'll just -- to finish up,
24 March -- May 25th. Now, there doesn't seem to be
25 something for April. Do you know why there would be

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1 **a break in the two-week reporting?**

2 A. No. I don't recall unless she just sent
3 it separate from the chain.

4 **Q. And then here she's bolded vaccination in**
5 **children, healthcare workers and masks and**
6 **vaccination; right?**

7 A. I see that, too.

8 **Q. And do you recall whether you spoke to her**
9 **about those things, or that was just her choice to**
10 **highlight those?**

11 A. We did not discuss with them the issues we
12 wanted in the CrowdTangle report.

13 **Q. All right. And then you say "thanks" in**
14 **response to this on 5:26. But we've got a new**
15 **person here. Tyler Woods. Who is that?**

16 A. I think, but I'm not positive, that he
17 took over the reports later, so perhaps he was
18 starting to come in on their team.

19 **Q. Okay. We've been going about an hour. I**
20 **always give the witness a chance to break if she**
21 **wants.**

22 A. I'm okay.

23 **Q. Okay.**

24 A. Thank you for checking.

25 MR. GILLIGAN: Can I ask one question,

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1 John?

2 MR. VECCHIONE: Yeah.

3 MR. GILLIGAN: What is the number of your
4 last exhibit?

5 MR. VECCHIONE: 42.

6 MR. GILLIGAN: Thank you.

7 And I actually -- that was -- I do have
8 one that's unmarked that I may use.

9 MR. GILLIGAN: Okay. Just to add a little
10 suspense. Thank you.

11 MR. VECCHIONE: Mm-hmm (affirmative).

12 (Plaintiffs' Exhibit 8 marked.)

13 BY MR. VECCHIONE:

14 **Q. All right. Do you recognize Exhibit 8?**

15 A. I haven't finished reading it.

16 **Q. Okay. Go ahead.**

17 A. Sorry. Okay. Sorry.

18 **Q. It's all right.**

19 A. Can you repeat the question?

20 **Q. Can you identify this document?**

21 A. I recognize the first page chain of
22 emails, but not the previous chain.

23 **Q. So you don't -- tell me where -- the first**
24 **page at the back?**

25 A. Oh, I'm sorry. No, the first page of the

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1 packet.

2 **Q. Got it.**

3 A. I remembered this email more -- I don't
4 have a recollection of this previous back and forth.

5 **Q. Got it. Well, what's the subject line?**

6 A. "This week's meeting."

7 **Q. Okay. And by this time were you meeting**
8 **with them every week?**

9 A. We were -- we were meeting weekly during
10 parts, so I imagine we were.

11 **Q. All right. And can you read the email**
12 **from Ms. Theme to you about the meeting on**
13 **March 30th, 2021, 2:42 p.m.?**

14 A. Yes. "Hi, Carol, hope all is well as it
15 can be. At least spring is making an appearance. I
16 wanted to surface any misinfo questions your team
17 may have for the team that I had briefing last time.
18 They are available to attend again, but also want to
19 make sure that we are answering any of your team's
20 questions."

21 **Q. All right. What's the briefing she refers**
22 **to?**

23 A. I don't recall the briefing specifically,
24 but I do recall her bringing in people from their
25 Trust and Safety or Misinformation teams -- I'm not

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1 sure what they called the team -- to talk to us
2 about misinformation at some weekly meetings. I
3 think that's probably what this is in reference to.

4 **Q. Why is she offering to surface misinfo**
5 **questions and to answer your team's questions?**

6 A. Because I think -- I can't say for sure
7 what she was thinking.

8 **Q. What's your understanding?**

9 A. But I think it was because we -- we had
10 asked questions about what they were seeing in terms
11 of misinformation and inquired about any activities
12 they were undertaking. And I believe this was an
13 offer to sort of get back to us on any of those
14 questions.

15 **Q. All right. That you had?**

16 A. Yes.

17 **Q. Given her. Thank you.**

18 A. Yes.

19 **Q. Let's clean up the record a little. That**
20 **you had -- the questions that you had proposed to**
21 **her?**

22 A. I think it was questions asked within the
23 meeting, but.

24 **Q. Got it.**

25 A. I'm not 100 percent sure because I don't

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1 know the timing of that meeting, but I believe
2 that's what this is in reference to.

3 **Q. And can you read your response at**
4 **3:08 p.m.?**

5 A. "Hope all is well, too. I plan to join
6 and listen to the 3:30 meeting, FYI. I added this
7 part in yellow to our chain on turn.io so you
8 probably missed it. Did you have thoughts on how we
9 can regularly meet with Census? I will also check
10 back with others to see if they have other Qs that
11 went unanswered and get back to you."

12 Do you want me to keep reading?

13 **Q. No, you can stop.**

14 A. Okay.

15 **Q. But what is "turn.io"?**

16 A. This was another project that we were
17 working on with WhatsApp.

18 **Q. And what was that project?**

19 A. I believe this was using WhatsApp to -- so
20 people could use it, they could look up ZIP codes to
21 find vaccines.

22 **Q. Okay.**

23 A. And maybe, I'm speculating, there was also
24 a Spanish offering for vaccine information on
25 WhatsApp. It was one of those.

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1 **Q. Got it. Why is Census involved in your**
2 **coordination with Facebook at this time?**

3 A. We had entered an IAA with Census to help
4 advise on misinformation.

5 **Q. And an IAA is?**

6 A. Interagency agreement.

7 **Q. All right. Did the CDC ever use any**
8 **software programs developed by Census that enabled**
9 **the CDC to track the viewpoints of U.S. citizens?**

10 A. No.

11 **Q. Did the CDC ever gain access to or in any**
12 **way receive information about the viewpoint of U.S.**
13 **citizens on COVID masking or vaccination from**
14 **Census?**

15 A. We likely did because they provided
16 reports on misinformation that they were seeing to
17 us.

18 **Q. Did the CDC ever share data on the**
19 **viewpoints of U.S. citizens with the Census?**

20 A. I don't recall if we did.

21 **Q. You did share the CrowdTangle with them?**

22 A. Yes. Can you reask the question?

23 **Q. I will. Did the CDC ever share the data**
24 **on the viewpoint of -- the viewpoints of U.S.**
25 **citizens that CDC was seeing with the Census?**

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1 A. You refer to it as data. I don't recall
2 sharing data. I do recall sharing social media
3 listening reports such as this, or the publicly
4 available vaccine confidence reports that talk about
5 what people are talking about, and probably the
6 JIC's research, you know. They had a standing
7 summary of what was being discussed. I suspect I
8 shared that, too, with Census.

9 **Q. The JIC? What kind of research, the?**

10 A. I mentioned the JIC research team that
11 looked at what the conversations were on news,
12 social media and did summaries of that for everyone
13 in the response.

14 **Q. All right. And did information come back**
15 **from the Census to CDC about what they were finding?**

16 A. My recollection is that the Census did
17 provide us with the key themes they were seeing
18 around misinformation during the times that they
19 were looking at it.

20 **Q. Who was at the meeting that Ms. Itheme**
21 **references and that you refer to in the next email?**

22 A. The next email, which email?

23 **Q. So above it. It says -- oh, hang on.**
24 **I'll tell you in a second.**

25 **"Yes, I did see and will know in a few**

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1 hours."

2 Hang on for a second.

3 So I took it to mean that this March 30th,
4 3:16 email that she says: "Hi, Carol, Yes, I did
5 see and will know in a few hours, I'm told if we
6 plan to present for Census Thursday or if it needs
7 more work."

8 And then you say that "I didn't ask Census
9 if they had questions."

10 Do you know if there was a meeting with
11 Census on or about that time?

12 A. I don't --

13 Q. Okay.

14 A. -- remember enough detail to answer the
15 question. Sorry.

16 Q. So in this March 30th, 2021 at 7:38.

17 A. Yes.

18 Q. There you say: "I didn't ask Census if
19 they had questions, but I know they were hoping to
20 go over the deck they had."

21 And is that the one you sent them or
22 Facebook sent them, or did they create that
23 themselves?

24 A. I don't know for sure. I'm interpreting
25 from this email that the Census created it, but I do

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1 not know.

2 Q. All right. "And discuss how to engage on
3 a more regular basis."

4 Do you know if they ever decided to engage
5 on a more regular basis?

6 A. With -- about their activity, or about
7 CDC?

8 Q. Yeah, with Facebook.

9 A. I don't know what Census did directly with
10 Facebook.

11 Q. And then I'll ask you to take a look at
12 the 3:16 again. She says: It would be great to
13 have questions that may not have been answered from
14 your team on misinformation. She says "misinfo",
15 but I'm using the full word.

16 And is she looking -- is it your
17 understanding she's looking for those answers from
18 Census that you didn't have, CDC?

19 A. Let me reread this chain.

20 Q. Go ahead.

21 A. Sorry. Can you repeat the question?

22 Q. I will withdraw the question for a moment.

23 A. Okay.

24 Q. Just take a look at March 30th, 7:46 as
25 well. She writes to you, Carol: "Hi, Carol. Yes,

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1 I think it's good to have questions from Census to
2 make sure we have the right person. I can ask Liz
3 to join again so she can be asked questions/provide
4 more information about influencers and I have noted
5 your question about removals and will tee that up as
6 well."

7 What was your question about removals?

8 A. I -- reading in this email?

9 Q. Yeah.

10 A. I'm saying -- the email before this I'm
11 saying the team is still interested in more info
12 about how you analyze the data on removals. And my
13 general recollection where this question came from
14 was that we -- the -- that I think there was
15 wondering if they delete the info will we know those
16 myths or information so we could update
17 communication activity. So if they were deleting
18 content would we know what the themes were.

19 Q. And did you ask them to remove any
20 content?

21 A. No. This was -- this was when -- this was
22 a meeting where we were just asking what -- how that
23 worked and would there be data, would we be able to
24 see in CrowdTangle or other reports like what kind
25 of themes were removed so we would still have the

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1 full picture of areas of confusion.

2 Q. All right. And if you look at your March
3 31st, 2:07 p.m., and you say what "Census mentioned
4 they'd like to discuss." "It looks like the post
5 from last week's deck about infertility and side
6 effects have all been removed. Were those
7 re-evaluated by the moderation team or taken down
8 for another reason?"

9 What are you saying there?

10 A. It looks to me like I cut and pasted this
11 from something that Census had said, and I don't
12 have good recollection of what this was on
13 March 31st.

14 Q. Then you've also cut and pasted: "One of
15 the main themes we're seeing and from the
16 CrowdTangle report is local news coverage of deaths
17 after receiving the vaccine. What's the approach
18 for adding labels to those stories?"

19 Why would you or Census want them to add
20 labels to those stories?

21 MS. SNOW: Objection. Calls for
22 speculation and mischaracterizes the testimony -- or
23 the document.

24 BY MR. VECCHIONE:

25 Q. You can answer.

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1 A. I don't think we were asking them to add
2 labels, from what I'm reading here. We were asking
3 them what their approach for labels were.

4 **Q. Then they have asked: "Can we add the**
5 **Census team to CrowdTangle?"**

6 **Hadn't it already been added to**
7 **CrowdTangle by this time? Haven't we established**
8 **that?**

9 A. There were two different offerings for
10 CrowdTangle. They had allowed us to directly log
11 into CrowdTangle and run our own reports or
12 searches. I believe that started back in, you know,
13 March or April 2020. Then they sent the reports.
14 So this appears to be to log in to CrowdTangle.

15 **Q. Then what did you mean by your team is**
16 **going to consider how you might want to engage with**
17 **CDC Census team routinely and get back to us?**

18 A. I don't know specifically this day this
19 email what I meant. But I do know that we generally
20 discussed, you know, how we should talk about
21 misinformation because they had already been working
22 with Census, on their own Census misinformation, and
23 I wanted to know what was best for them for engaging
24 on any topics that we might want to discuss.

25 **Q. All right. Do you know what Facebook was**

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1 told previously about engaging with CDC and Census
2 on this?

3 MS. SNOW: Objection. Vague, calls for
4 speculation.

5 BY MR. VECCHIONE:

6 Q. You can answer.

7 A. Can you rephrase the question?

8 Q. Yeah. They were already engaging, it
9 seems to me, with CDC and Census at this time. Do
10 you know if there was anything additional from what
11 we've discussed about such engagement that's causing
12 them to ask this question?

13 A. Causing them to ask what question?

14 Q. About closer engagement with the Census,
15 and you asking to have -- "can we add the Census
16 team to CrowdTangle?" Do you know what --

17 MS. SNOW: Objection. Mischaracterizes
18 the document.

19 BY MR. VECCHIONE:

20 Q. It's okay. You can answer if you
21 understand. I'm trying to understand. It seems
22 that Facebook has been talking to CDC and Census
23 throughout for a while now. And yet here is a
24 request that they want a different CrowdTangle, as
25 you've explained.

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1 MS. SNOW: Objection. It assumes facts
2 not in evidence.

3 BY MR. VECCHIONE:

4 Q. You can still answer. I'm trying to
5 understand what is happening in this series of
6 emails, since they have already been sending you the
7 CrowdTangle information. You've explained that
8 there was a different CrowdTangle information that
9 Census might want; right? That is --

10 A. I think it was the log-in to the
11 CrowdTangle.

12 Q. Okay. Well, I'll give you an example. So
13 Ms. Theme asks: Yes, I think it's good -- this is
14 at 7:46 on March 30th, said: "I think good to have
15 question from Census so we make sure we have the
16 right person."

17 So my question is, is that the right
18 person to answer those questions to the Census from
19 Facebook? What's your understanding?

20 A. I don't know this chain of emails
21 specifically, but I believe it was likely in
22 reference to just me mentioning to Payton that we
23 were partnering with the Census to learn more. We
24 had been discussing things, and we were going to
25 have some collective questions that we would like to

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1 discuss at a future meeting.

2 Q. Okay. What's the amplification side at
3 March 30th at 7:38? You are going to ask Liz about
4 what is being done on the amplification side. What
5 does that mean?

6 A. I don't know why I was asking that.

7 Q. And why did you want to get a better
8 understanding of how Facebook was working with
9 influencers?

10 A. I don't remember the meeting before that,
11 so I'm not sure what that is in reference to.

12 Q. And it says the team's interested in more
13 info on how you analyze the data on removals.

14 Why are you asking about how Facebook
15 operates on removals?

16 MS. SNOW: Objection. Asked and answered.

17 A. I did answer it previously.

18 BY MR. VECCHIONE:

19 Q. I don't believe I have directed you to
20 that exact portion of this, and I would ask the
21 witness to answer unless she's being instructed not
22 to.

23 MS. SNOW: No, you may answer.

24 A. Okay. What I think this was about was I
25 believe the teams that were looking at, like, our

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1 research reports, or our vaccine confidence report
2 were wondering if the data was removed if it would
3 show up in the report, so would they be missing gaps
4 or information because the posts were removed.

5 That's what I believe that this question is about.

6 BY MR. VECCHIONE:

7 **Q. All right. CDC wasn't concerned that they**
8 **weren't removing materials fast enough?**

9 A. That's not what I believe was being
10 discussed here. This was about the data that we
11 could get so we had a full picture on confusion so
12 that we could adjust communication materials, or
13 ways that we were communicating. That's what I
14 believe that that's in reference to.

15 And you know what, I have a clarification.

16 **Q. Go right ahead.**

17 A. You asked me what the amplification
18 side --

19 **Q. Yes.**

20 A. -- and the influencers. Now that I'm
21 remembering this, I think that it it was likely
22 about how to promote how to get a vaccine, or where
23 to get a vaccine and I think that was all part of
24 that conversation.

25 **Q. All right. Let's go to the March 31st,**

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1 **2021 at 2:07, the one you've told me you've cut and**
2 **pasted from Census, at least those bullet points.**

3 A. You mean March 31st?

4 **Q. March 31st at 2:07.**

5 A. Yes.

6 **Q. It says: "Were those reevaluated by the**
7 **moderation team or taken down for another reason?"**

8 **Do you know if that refers to a moderation**
9 **team at CDC or Facebook?**

10 A. It must have been Facebook because we
11 don't have a moderation team at CDC.

12 I'd also like to clarify that I think I
13 probably cut and pasted it. I don't know for sure
14 that I did.

15 **Q. That's fine. Got it. I follow you.**

16 **Why do you -- do you know why you wanted**
17 **to know what the approach for adding labels to the**
18 **stories about deaths after receiving the vaccine**
19 **was?**

20 MS. SNOW: Objection. Asked and answered.

21 A. I don't remember this specific set of
22 conversation, or why we were asking about that any
23 longer.

24 BY MR. VECCHIONE:

25 **Q. Okay. Do you know -- so you're discussing**

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1 **talking to Census at some point. Do you know**
2 **whether that conversation ever happened, a**
3 **conversation with -- regarding this string of emails**
4 **with Census, CDC and at Facebook?**

5 A. I don't know that we were discussing the
6 string of emails, but there were meetings where
7 Census, myself and Facebook were on calls.

8 **Q. Okay. And do you recall what you**
9 **discussed?**

10 A. My memory is we had general conversations
11 about what were opportunities to address
12 misinformation. And things like in this chain I
13 believe were probably discussed, but I don't have
14 specific memory of it.

15 **Q. Do you know who your contact was at**
16 **Census, like who was the main person at Census on**
17 **this aspect of the CrowdTangle and dealing with**
18 **Facebook?**

19 A. There were a couple of people from Census
20 that we were talking with. I only remember two of
21 the names. One was Christopher Lewitzke, who I
22 believe was a contractor for them. And then Jen
23 Shopkorn, I think I'm saying it correctly. I
24 believe she was their director for digital.

25 **Q. Thank you.**

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1 A. But there were a couple of others that
2 typically participated.

3 **Q. And then March 31st at 2:18 Ms. Theme**
4 **writes you: "Hi, Carol we are working on a proposal**
5 **how set up sharing partnership on the misinformation**
6 **items, what would it look like, so we can discuss**
7 **Thursday. Lots of team members out the last two**
8 **weeks due to all the holidays, but that is the plan**
9 **so we can discuss on the Thursday call."**

10 **Do you know whether that meeting, the**
11 **Thursday meeting, to set up sharing partnerships on**
12 **misinformation occurred?**

13 A. I don't remember if this specific meeting
14 occurred.

15 **Q. Would you have a calendar that would tell**
16 **you?**

17 A. Yes.

18 MR. VECCHIONE: I would ask counsel to
19 produce that calendar of the date of that meeting.

20 MR. GILLIGAN: We'll take your request
21 under advisement.

22 MR. VECCHIONE: Thank you.

23 BY MR. VECCHIONE:

24 **Q. And once again would you have notes or**
25 **recordings of that conversation?**

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1 A. We never recorded the calls. If I had --
2 I didn't take many notes, but if there was anything
3 it would be in Word or email.

4 MR. VECCHIONE: You can put 8 aside,
5 Exhibit 8 aside.

6 (Plaintiffs' Exhibit 9 marked.)

7 BY MR. VECCHIONE:

8 **Q. In this, if you'll just an initial look at**
9 **it you can tell me. I just ask you to -- I'd like**
10 **you to identify it and tell me the date of the**
11 **email.**

12 A. The subject is Misinfo on two issues. And
13 the date of the email is May 6, 2021.

14 **Q. All right. You can continue to read it.**

15 A. Read the email?

16 **Q. Yeah.**

17 A. "Payton, Genelle" --

18 **Q. No, no. I mean, to yourself.**

19 A. Oh.

20 **Q. Just scan through it.**

21 A. Sorry. Thank you.

22 **Q. I want you to be a little familiar with**
23 **it.**

24 MR. GILLIGAN: Good clarification.

25 A. Okay.

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1 BY MR. VECCHIONE:

2 Q. All right. So can you tell us why you
3 were flagging misinformation about the vaccines for
4 Facebook?

5 MS. SNOW: Objection. Mischaracterizes
6 the document.

7 BY MR. VECCHIONE:

8 Q. Well, let's take a look at it for a
9 moment. It's from you; right?

10 A. Yes.

11 Q. And then it's to Ms. Theme under a new
12 name Gennelle Adrien. Do you know her and what her
13 role was?

14 A. I think she was one of Payton's
15 assistants.

16 Q. All right. And then you're cc'ing Sam
17 Huxley at [REDACTED]@Reingold.com. Do you know who that
18 is?

19 A. Yeah, now that I see the name. Sam was a
20 contractor for Census that was often on our phone
21 calls with Christopher and Jen.

22 Q. And that's Christopher Lewitzke; right?

23 A. Yes.

24 Q. And then Jennifer Shopkorn, I apologize if
25 you told me who that was, but who was that?

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1 A. She's with Census, and I believe she's the
2 director for their digital team.

3 **Q. And Lynn Sokler?**

4 A. Lynn Sokler is a counterpart of mine in
5 OADC who was working on this partnership with Census
6 along with myself.

7 **Q. All right. And then it says:**
8 **"Payton/Genelle. As mentioned, here are two issues**
9 **we are seeing a great deal of misinfo on that we**
10 **wanted to flag for you all -- vaccine shedding and**
11 **microchips"; right? You wrote that?**

12 A. Yes.

13 **Q. Can you tell us why you were flagging**
14 **misinformation about the vaccines for Facebook?**

15 A. Because we had had conversations with
16 Facebook about ways that we could address
17 misinformation, and my recollection is that one
18 suggestion that was -- that came up in that
19 conversation was to let them know if we were seeing
20 major themes that CDC had scientific information on,
21 or had web content that would address.

22 I believe that is why I was sending these,
23 because these were two large areas of
24 misinformation.

25 **Q. What did you mean by the term "flag" or**

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1 **flagging?**

2 A. Pointing out.

3 **Q. What was the expectation of what Facebook**
4 **would do when something was flagged?**

5 A. I don't recall having a specific
6 recollection of what I thought that they would do.

7 I do know that the platforms have a
8 variety of ways to address misinformation. They
9 might tag it as something that people should look
10 more into. I think that they have the -- I think,
11 but I do not know, that they have the ability to
12 control how often some of these things show up in
13 peoples' feeds. And I do know that removing them is
14 an option that they could consider.

15 So I didn't know exactly what they might
16 do with it, but I felt like it was worth pointing
17 out what we knew, that we had seen these myths and
18 that we were going to have information up soon.

19 **Q. All right. And what was the consequence**
20 **to Facebook if they didn't do anything with your**
21 **flagging of these items?**

22 A. Nothing.

23 **Q. All right. What were you hoping to**
24 **accomplish by flagging these items for Facebook?**

25 A. I mean, our goal always is to be sure that

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1 people have credible health information so that they
2 can make the correct health decisions for
3 themselves. There were a lot of things circulating
4 that were not accurate information about COVID. And
5 so we were trying to point out and make the credible
6 information more available to users.

7 **Q. How did you decide on these particular**
8 **posts?**

9 A. I don't remember specifically this
10 conversation, or what made us decide. But I do know
11 generally that these were two very high-volume
12 misconceptions online at the time about vaccines.

13 **Q. All right. Do you recall whether you had**
14 **any criteria in determining which posts to flag?**

15 A. I don't recall that we had any criteria on
16 what we pointed out to Facebook other than it had to
17 be something that was in CDC's lane that we had
18 information for, you know, to offer about it, and
19 something that had been -- you know, was high
20 volume, that was worth pointing out to this entity.

21 **Q. Did you or anyone at CDC have concerns**
22 **about the government working with Facebook and**
23 **telling them what should be flagged or not?**

24 MS. SNOW: Objection. Mischaracterizes
25 testimony, calls for speculation.

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1 BY MR. VECCHIONE:

2 Q. You can answer.

3 A. Can you rephrase the question again, or
4 say it again?

5 Q. Yeah. Did you or anyone at CDC have any
6 concerns about CDC or the government flagging
7 materials for Facebook when you knew they took some
8 things down?

9 A. I can't speculate what others at CDC might
10 have thought about it. Personally, because I didn't
11 believe we were asking them to remove content
12 specifically, I did think getting credible
13 information out was important.

14 Q. Where did this information about
15 microchips and the shedding, what kind of
16 information did the Census team have on those posts
17 at that time?

18 A. My recollection is that we were pointing
19 out to Facebook that there were these themes going
20 around pretty heavily, and these probably came from
21 the social listening tools, you know, that can
22 consolidate examples. And we provided some examples
23 of what we meant.

24 Q. Okay. You can put that aside.

25 A. Thank you.

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1 (Plaintiffs' Exhibit 10 marked.)

2 BY MR. VECCHIONE:

3 **Q. And, again, I'll give you a chance to read**
4 **it, but if you could just identify the document and**
5 **the subject line?**

6 MR. GILLIGAN: The document being
7 Exhibit 10?

8 MR. VECCHIONE: Exhibit 10.

9 A. It says: Subject CV19 misinfo reporting
10 channel. May 10, 2021.

11 BY MR. VECCHIONE:

12 **Q. All right. What is -- I presume CV19 is**
13 **COVID-19?**

14 A. Yes.

15 **Q. "Misinfo" is misinformation?**

16 A. Yes.

17 **Q. All right. What is the COVID-19**
18 **misinformation channel?**

19 A. Well, I don't think I -- just rereading
20 this email, I don't think I understood this at
21 first, what she was referring to. I think I thought
22 that this was CrowdTangle, just by reading the
23 chain, but I now know what it was was Facebook
24 apparently has a portal or reporting channel where
25 you can report misinformation or threats or things

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1 from a specific log-in that I believe they only
2 provide to like federal agencies.

3 **Q. All right. And who used it at the CDC?**

4 A. To my recollection, the only person that
5 ever logged in at CDC was Brook Aspinall.

6 **Q. Who was that?**

7 A. She was part of our social media team.

8 **Q. For what?**

9 A. For COVID.

10 **Q. For what did she log on?**

11 A. Oh. Why did she log on?

12 **Q. Yeah.**

13 A. My memory is that we log on one time to
14 see what it was -- what the system was and
15 understand what we could do in it. And she logged
16 on one time, and I think reported two or three -- I
17 don't remember what they were -- two or three posts
18 or threats or one or the other.

19 **Q. All right. Would you have a record of
20 what she put on there?**

21 A. I believe so. But I only really remember
22 this from pulling documents at some point related to
23 this litigation earlier in the process. I recall
24 there was an email that listed it, but I don't
25 remember what they said. But I believe that there

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1 is a record of it because I recall seeing it during
2 that process.

3 **Q. All right.**

4 MR. VECCHIONE: I would request that as
5 well, Counsel. But I'll put it in writing.

6 BY MR. VECCHIONE:

7 **Q. Well, I'll just ask this question. I**
8 **usually ask this question earlier, but I might as**
9 **well. In preparation for your deposition today, did**
10 **you review any documents?**

11 A. No. Well, we -- the only one I reviewed
12 happened to be one of the ones you had during our
13 practice.

14 **Q. Good. All right. That's fine. Do you**
15 **know which one it was?**

16 MS. SNOW: Objection.

17 A. Oh, sorry.

18 MS. SNOW: To the extent this calls for --

19 MR. GILLIGAN: Does call for.

20 MS. SNOW: The question calls for
21 information that's covered by the attorney-client
22 privilege. So I direct the witness not to answer.

23 MR. VECCHIONE: No, it doesn't. What
24 she's reviewed I'm allowed to know. That's --

25 MR. GILLIGAN: Not if it didn't refresh

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1 her recollection.

2 MS. SNOW: Yeah.

3 MR. VECCHIONE: Doesn't matter. She

4 reviewed it. I'm allowed to know it.

5 MR. GILLIGAN: No, you're not.

6 MS. SNOW: Not if it did not refresh her

7 recollection about the facts.

8 MR. VECCHIONE: She's been shown the

9 document today. I'm allowed to know which one she

10 reviewed if she's been shown it today.

11 MS. SNOW: You're asking about documents

12 that --

13 MR. VECCHIONE: That she saw today.

14 MS. SNOW: -- she reviewed in

15 preparation --

16 MR. VECCHIONE: Yeah.

17 MS. SNOW: -- for the deposition?

18 MR. VECCHIONE: Yes.

19 MS. SNOW: Yes, that is covered by

20 attorney-client.

21 MR. VECCHIONE: She said she's been shown

22 it today. There is no attorney-client privilege for

23 that.

24 MR. GILLIGAN: I don't know that -- I

25 don't know that she said that she was shown it

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1 today.

2 BY MR. VECCHIONE:

3 **Q. I'll ask. Were you shown it today?**

4 A. One of them, yes.

5 MR. GILLIGAN: It's still --

6 MR. VECCHIONE: It's an improper
7 objection, but it's not that important, so I'm going
8 to let it go for now.

9 MR. GILLIGAN: All right. Well, if you
10 care to raise the issue again later, we'll be happy
11 to discuss it later.

12 BY MR. VECCHIONE:

13 **Q. All right. So who's responsible for**
14 **creating this channel, this COVID-19 channel?**

15 A. Well, I have a small recollection of this
16 channel, and I never looked at it myself to my
17 memory. But it's, to my understanding, you log onto
18 Facebook as an administrator, and it's something
19 that they make available to you as a federal agency.

20 **Q. Okay. So Facebook made it?**

21 A. Yeah. It's like a place you can go and
22 report something. I -- "channel" does feel like an
23 odd description of it to me.

24 **Q. Okay. How do you know that it was made**
25 **available to, like, law enforcement? Do you know**

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1 **that from this document, or do you know that from**
2 **your own memory?**

3 MS. SNOW: Objection. Facts not in
4 evidence.

5 MR. VECCHIONE: She testified to it a
6 minute ago.

7 MS. SNOW: Okay. Sorry. My apologies. I
8 missed that. Sorry.

9 BY MR. VECCHIONE:

10 **Q. So how do you know that? Like, why is**
11 **that your understanding?**

12 A. I guess I can't say I know that. I have a
13 vague recollection of it being described to me as
14 something that other, like, official groups could
15 use to report, that it wasn't something that was
16 generally available. But I might be wrong.

17 **Q. Okay.**

18 A. I don't know for sure.

19 **Q. That's fine. Now, at the end of this**
20 **email there is a list of other email lists; right?**
21 **She says: Thank you, Genelle. And then she lists**
22 **some government people and some Census people and**
23 **CDC people and Reingold again.**

24 A. I see it.

25 **Q. So those -- and she asks you to confirm if**

CAROL CRAWFORD 11/15/2022

1 the below emails are correct for onboarding to the
2 reporting channel; right?

3 A. Yes.

4 Q. All right. Are any of those people the
5 Ms. Aspinall I think you told me before?

6 A. Those emails are so difficult, I don't
7 know. Perhaps it's [REDACTED] or [REDACTED] or [REDACTED], but I don't
8 know peoples' user IDs, so I can't answer.

9 I would also like to clarify that when I
10 was reviewing this based on this chain, I thought
11 this was about CrowdTangle access.

12 Q. Okay. At that time?

13 A. At this -- yes, so.

14 Q. You don't believe that now, but that's
15 what you thought when you received it?

16 A. Yes. I can see in this chain that that's
17 what I thought was happening with this.

18 Q. All right. Do you know how this list of
19 employees, whether you recognize them or not, do you
20 know how the people for access were selected,
21 like --

22 (REPORTER'S NOTE: Loud audio noise heard
23 over loud speakers in room.)

24 (Comments off the record.)

25 MR. VECCHIONE: Let's go off record.

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1 THE VIDEOGRAPHER: Off record at 11:51.

2 (Comments off the record.)

3 THE VIDEOGRAPHER: Back on record at
4 11:53.

5 BY MR. VECCHIONE:

6 **Q. All right. So the question is, the**
7 **question on the floor, before we were so rudely**
8 **interrupted, was how was this list of employees or**
9 **contractors selected?**

10 A. I don't know. Maybe from a meeting
11 invite. Maybe people that were on a meeting, but I
12 don't know.

13 **Q. Do you know whether there was any training**
14 **involved in using this COVID-19 misinformation**
15 **channel?**

16 A. I don't remember any training. The email
17 looks like perhaps there was.

18 **Q. Do you know whether CDC employees or**
19 **contractors asked to flag or report certain kinds of**
20 **information to Facebook?**

21 A. Yes. On occasion there were people saying
22 "we saw this." Usually they were around threats
23 that they wanted us to report, which you can do as
24 an administrator for Facebook now.

25 In terms of this, I only remember the one

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1 occasion that I mentioned a minute ago.

2 **Q. Was Facebook asked to flag certain types**
3 **of material to report to CDC or to Census?**

4 MS. SNOW: Objection. Vague.

5 BY MR. VECCHIONE:

6 **Q. I mean, I have asked whether or not CDC**
7 **asked to flag things to Facebook, and you've**
8 **answered that question. Did Facebook ask CDC to**
9 **flag things to them?**

10 A. Well, the way I have been using "flag" in
11 these emails is to point out.

12 **Q. Right.**

13 A. I don't recall asking them to point
14 anything out to us, but I can maybe recall us saying
15 something are you seeing this too, are y'all
16 considering this too?

17 **Q. Do you know whether or not we have any**
18 **documents that were given to CDC staff or**
19 **contractors regarding the training on this COVID-19**
20 **channel?**

21 A. I don't recall.

22 **Q. Okay. Did the meeting -- I think it was**
23 **from May 18th. Let me look at the document for a**
24 **second.**

25 Okay. You had a meeting that she -- that

CAROL CRAWFORD 11/15/2022

1 **Genelle Adrienne refers to on May 7, 2021, 11:27**
2 **a.m. "Hi, Carol following up from our meeting**
3 **yesterday it looks like Monday May 17th at 12 will**
4 **work for onboarding meeting."**

5 **Do you know whether that onboarding**
6 **meeting ever occurred for this channel?**

7 **A. I don't have any recollection of the**
8 **onboarding meeting.**

9 **Q. And once again would you have a calendar**
10 **mark for that onboarding meeting, if it occurred?**

11 **A. If I was invited I would.**

12 **MR. VECCHIONE: And once again, I'll put**
13 **that in a letter to you, Counsel.**

14 **MS. SNOW: We'll note that document**
15 **discovery has closed, but we'll take it under**
16 **advisement.**

17 **MR. VECCHIONE: I got you.**

18 **BY MR. VECCHIONE:**

19 **Q. And you can put Exhibit 10 aside.**

20 **Oh, you know, might need it for this, but**
21 **I don't know if you do.**

22 **The Reingold contractors. Why did CDC**
23 **need contractors? What were they doing? Did they**
24 **have concern -- let me withdraw the question.**

25 **Why did CDC have the contractors, the**

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1 **Reingold contractors, involved in this?**

2 MS. SNOW: Objection. Mischaracterizes
3 testimony.

4 BY MR. VECCHIONE:

5 **Q. Was it Census?**

6 MS. SNOW: Objection. Vague.

7 BY MR. VECCHIONE:

8 **Q. Why were the Reingold contractors involved**
9 **in all this?**

10 A. They were contractors working with Census.

11 **Q. Okay. Did you know why they were**
12 **contractors and not Census directly?**

13 A. No.

14 **Q. Do you know if their duties involve**
15 **content moderation?**

16 A. I don't.

17 **Q. Do you know whether their duties involve**
18 **flagging or reporting on certain kinds of opinions**
19 **expressed by U.S. citizens?**

20 MS. SNOW: Objection. Vague, calls for
21 speculation.

22 BY MR. VECCHIONE:

23 **Q. You can answer.**

24 A. I really don't know. I wouldn't know what
25 they had them do.

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1 MR. VECCHIONE: All right. That's it for
2 10. I could go on to 11, and or we could break here
3 and fix the sound. You go -- you could have lunch.
4 Decide what the witness --

5 MR. GILLIGAN: It's up to the witness to
6 break.

7 THE WITNESS: Let's break. Let's break.

8 MR. VECCHIONE: There you go.

9 THE VIDEOGRAPHER: Off record at 11:59.
10 (Lunch recess 11:59 a.m. - 12:51 p.m.)

11 THE VIDEOGRAPHER: Back on record at
12 12:51.

13 MS. SNOW: And, defense counsel, just like
14 to note that we've reestablished the Zoom connection
15 and shared a call-in phone number again, which is
16 being forwarded to plaintiffs' counsel pursuant to
17 the previous agreement that it not be shared, the
18 Zoom link not be shared beyond plaintiffs' counsel
19 or the Zoom, or the call recorded using the Zoom
20 call-in number.

21 MR. VECCHIONE: That's fine.

22 (Plaintiffs' Exhibit 11 marked.)

23 BY MR. VECCHIONE:

24 **Q. All right. Ms. Crawford, I have handed**
25 **you -- once again can you identify Exhibit 11 and**

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1 then tell me what the subject matter of the -- what
2 the subject line is, and then you can continue to
3 read it.

4 A. Agenda item for CDC call this week.
5 May 20th, '21.

6 Okay.

7 **Q. Can you tell me who Liz Lagone is?**

8 A. My understanding is that Liz is on their
9 Trust and Safety team, or the Misinformation team,
10 which I don't know what the official name of it is.

11 **Q. Meaning Facebook's?**

12 A. Yes, Facebook's. Sorry.

13 **Q. And in these emails Ms. Lagone identified**
14 **the, quote, "Content Policies" of Facebook as**
15 **guiding which posts get removed; right?**

16 A. It says "we may reduce, remove or inform."

17 **Q. And I think she describes these policies**
18 **as evolving?**

19 A. Yes, I see that.

20 **Q. Okay. Did you or anyone at the CDC**
21 **participate in the crafting of the content policy of**
22 **Facebook?**

23 A. No.

24 **Q. Did you or anyone at CDC contribute to the**
25 **terms of service or community standards of Facebook?**

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1 A. No.

2 Q. Any other policy at Facebook that they
3 contributed to?

4 A. No.

5 Q. Did you do so at any other social media
6 company?

7 A. No.

8 Q. Did you or anyone at CDC ever give input
9 on what such a policy should look like?

10 A. No.

11 Q. Did you, or --

12 A. I should clarify.

13 Q. Go ahead.

14 A. I'm speaking from my -- no one in my group
15 or my office. I can't imagine anyone else did.

16 Q. To your knowledge?

17 A. Yes, yes.

18 Q. You're only testifying to your knowledge.

19 I understand that.

20 A. Yes.

21 Q. Thank you.

22 Did you or anyone at the CDC either advise
23 or help Facebook on how to enforce or apply their
24 policies to any particular social media post?

25 A. Not that I recall.

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1 Q. Same question for other social media. Did
2 you ever -- did you or anyone at CDC help any other
3 social media company on how they should apply their
4 policies to -- toward a particular post?

5 A. No. We didn't -- I have never seen their
6 policies.

7 Q. Did you or anyone at CDC ever discuss with
8 Ms. Lagone any manner relating to any enforcement of
9 the policies that she's discussing here?

10 MS. SNOW: Objection. Vague.

11 BY MR. VECCHIONE:

12 Q. Well, she's discussing these policies
13 here. Did you ever discuss with her their
14 development and enforcement?

15 A. No. We did not discuss the development of
16 their policies, or the enforcement of their
17 policies. What we did provide was scientific
18 information that I did assume that they might use to
19 do those things.

20 Q. Okay. I'd like you to take a look at one
21 of -- she -- Payton Itheme lays out a number of items
22 that I think she says at May 19th, 4:19: To help
23 with scoping on your end for Thursday, here's some
24 of the COVID content items that Liz will be flagging
25 for you the CDC team.

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1 **And here she seems to be flagging items**
2 **for you at CDC. And then she goes through them.**
3 **And what did you do when they flagged some of these**
4 **to you? What -- why was she flagging those to you,**
5 **and then what did you do in response?**

6 MS. SNOW: Objection. Compound.

7 BY MR. VECCHIONE:

8 **Q. You can answer.**

9 A. So why were they flagging this to us?
10 First part. They were wanting our feedback on
11 whether these things were true or false statements
12 that they were seeing. Did the CDC have science
13 around this, did we have content on our website.

14 Can you refresh me on the second part of
15 the question?

16 **Q. And what did you do in response to the**
17 **flagging?**

18 A. Typically what we would do is try to
19 let -- if we knew, if we had something or we had
20 science on these items, we would point to it or
21 provide them an answer. If we didn't, we wouldn't
22 provide it.

23 My recollection, this might have been one
24 of the first times they asked in this type of
25 format. And I think we talked about that on the

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1 call, like, who knew -- some of these people, I
2 thought, could help answer whether -- what we had on
3 these topics.

4 **Q. All right. And you had -- and let's,**
5 **since you just pointed out, we'll just say --**

6 A. Mm-hmm (affirmative).

7 **Q. -- your response was: Thanks for the**
8 **additional info. And then you say you're going to**
9 **have these folks joining.**

10 **And you've got the Census team members**
11 **joining this. Cynthia Jorgensen, director of Comms**
12 **for NCIRD. What's that?**

13 A. National Center for Immunization and
14 Respiratory Diseases at CDC.

15 **Q. "And our joint information center**
16 **co-lead." So is she that as well? She's the joint**
17 **information center co-lead, or is that a different**
18 **person?**

19 A. She was serving both roles. She -- we
20 deployed to the response, and she was -- at this
21 point in time was deployed as the co-lead for the
22 joint information center, but her regular job is the
23 ADCS. So she had a lot of knowledge regarding this
24 topic.

25 **Q. And then you've got Rosie**

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1 **Bretthauer-Mueller and Demi Haynes. And they are**
2 **co-leads for consumer vaccine content development.**

3 **Is that content development on your**
4 **website at CDC?**

5 A. Yes.

6 **Q. Okay. And they say: "I'm not going to**
7 **have SME join."**

8 **Is that subject matter experts?**

9 A. Yes.

10 **Q. What are those?**

11 A. That would have been like an actual
12 scientist that studied these issues, or knew what
13 the science was on it. When I -- I believe when I
14 scanned this I thought we probably had readily
15 answered -- we probably had a lot of this already
16 addressed on the website, and the content folks
17 would be able to point that out. We didn't have to
18 have the expert on the call.

19 **Q. I have -- if you look at 11.**

20 A. Mm-hmm (affirmative).

21 **Q. "Is the claim 'COVID-19 manmade' false,**
22 **unproven, unsupported by evidence, or true?"**

23 **Do you know whether or not CDC ever**
24 **responded to that inquiry?**

25 A. I don't know for sure, but I doubt we

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1 would have.

2 **Q. And why do you think that?**

3 A. I don't recall us having any information
4 on this posted on our website. I know it came up a
5 lot, but I don't remember us having it like an FAQ
6 on it.

7 **Q. All right.**

8 A. But I'm not an expert on all the content
9 we had on the web. I don't develop the content.

10 **Q. I understand.**

11 A. Okay.

12 **Q. I'm just -- I appreciate the information
13 and why you thought it.**

14 I have a -- so this -- Census is now in.
15 Is this after the IAA you mentioned to me yesterday?
16 Earlier today. It's not yesterday yet. Before
17 lunch?

18 A. Yes.

19 **Q. Okay. So what is the -- what's your
20 understanding of what an interagency memo is, or an
21 interagency agreement is?**

22 A. I'm definitely not an expert on IAAs. But
23 it's an agreement between two agencies to conduct
24 some kind of work between them. Sometimes you're
25 given fundings to do it. Usually you are. I

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1 don't -- I wasn't -- I didn't create the IAA, so I
2 don't have a lot of details on what was in it.

3 **Q. Have you seen it?**

4 A. I do believe I saw it.

5 **Q. Is it related just to COVID, or is it**
6 **broader than that?**

7 MS. SNOW: Objection. Assumes facts not
8 in evidence.

9 BY MR. VECCHIONE:

10 **Q. Okay. Is it related to COVID?**

11 A. I cannot say for sure what was stated in
12 the IAA, but we were only engaging on COVID
13 misinformation. But we were learning about how they
14 operated a general misinformation team along the way
15 to --

16 **Q. How Census did?**

17 A. How Census did it, yes.

18 **Q. And did you -- was part of the IAA --**
19 **well, I'll ask it in two parts first. Was part**
20 **of -- was the purpose of the IAA so that CDC could**
21 **learn what they did and perhaps replicate it?**

22 A. Was that the purpose of the IAA? No, I
23 wouldn't say it. I think that we were learning from
24 it to determine if we needed to do it. I really
25 don't recall the wording in the IAA.

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1 **Q. Okay. What was your understanding of what**
2 **the AII was about?**

3 A. To let us partner with the Census to learn
4 how they handled misinformation and help us with the
5 COVID misinformation. We were shorthanded. They
6 seemed to have more knowledge than we did.

7 **Q. All right. And do you know if the IAA is**
8 **still in place?**

9 A. Well, we haven't been working with Census
10 in quite some time. I don't know the actual date on
11 the end of the IAA, though.

12 **Q. All right. If you look at item eight of**
13 **the items flagged: "COVID-19 vaccine cause bell's**
14 **palsy." Do you see that?**

15 A. Yes.

16 **Q. Do you know whether you gave any input on**
17 **that question?**

18 A. I don't recall.

19 **Q. And how about item number nine: "COVID-19**
20 **has 99.96% survival rate"?**

21 A. I don't remember what we said about that
22 one.

23 **Q. All right.**

24 MR. VECCHIONE: I will hand over these all
25 at once because I'm going to ask the same question

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1 about them.

2 MR. GILLIGAN: 31?

3 MR. VECCHIONE: 12. No, no, no, 12
4 through 14, how about that?

5 (Plaintiffs' Exhibit 12 and Exhibit 13
6 marked.)

7 BY MR. VECCHIONE:

8 Q. And you don't have to read through these.
9 You can just look at them all at once. I'll let
10 counsel look at them for a second, and then I'll ask
11 the question.

12 Now, I'll just represent to you what these
13 are, unless you can tell me you've seen them before.

14 A. I haven't seen them before.

15 Q. All right. So Exhibit 12 is a scientific
16 paper on the relationship between Bell's palsy and
17 SARS CoV-2, as is 13.

18 Do you know whether or not in relationship
19 to Exhibit 11 and Bell's palsy, that whether or not
20 any of these scientific articles or others on Bell's
21 palsy were flagged by CDC to Facebook?

22 MS. SNOW: Objection. Calls for
23 speculation. Lack of foundation.

24 BY MR. VECCHIONE:

25 Q. You can answer, if you know.

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1 A. I wouldn't know. I mean, I didn't flag
2 them.

3 (Plaintiffs' Exhibit 14 marked.)

4 BY MR. VECCHIONE:

5 **Q. Okay. And then on 14, Plaintiffs'**
6 **Exhibit 14, have you seen this before?**

7 A. No.

8 **Q. And this is another scientific paper on**
9 **the percentage survival rate of COVID patients.**

10 **Do you know whether this was flagged by**
11 **CDC to Facebook or other social media?**

12 A. We didn't flag this, or specific things.
13 We provided CDC content.

14 **Q. All right. And that means things that**
15 **either CDC had on its website, or it knew**
16 **internally?**

17 A. I think primarily it was things that were
18 on CDC's site, but I can't say that for sure. I did
19 not, not -- none of the communicators answered the
20 questions directly.

21 **Q. Okay.**

22 A. Unless we had it on our website.

23 **Q. So what you do is would you refer them to**
24 **subject matter experts?**

25 A. Those questions would -- if they were on

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1 an email, they would go, you know, we would -- I
2 didn't.

3 **Q. Right.**

4 A. People in the response would ask the SMEs
5 about them. That's my understanding of what
6 happened when they were circulated.

7 **Q. So I'm trying to get the trail of how they**
8 **get -- how Facebook or the other social media get**
9 **information. You're the contact point oftentimes.**
10 **They send you things like this?**

11 A. Mm-hmm (affirmative).

12 **Q. Then somebody -- and we've already**
13 **determined, you're not -- you don't do science,**
14 **you're a communicator, right? And a tech person?**
15 **So where do you send this material to get those**
16 **answers if it's not on the website? Because you've**
17 **told me if it's on the website we just send it over**
18 **to them.**

19 A. I didn't even always check to see if it
20 was on the website myself or in my office. I would
21 let the communicator that was assigned to whatever
22 the area was. For instance, Rosie on the Exhibit 11
23 was working with this area, and she would have the
24 contacts with the experts.

25 **Q. Okay.**

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1 A. I don't know what they -- how they got the
2 answers back in every instance.

3 Q. Because you weren't always the person to
4 send the answer back?

5 A. I sent the answers back, but I didn't
6 collect them. Usually they required multiple
7 experts.

8 Q. Okay. All right. And in Exhibit 11
9 again -- you can put 12 to 14 aside. Do you know if
10 Cynthia Jorgensen and Rosie Bretthauer-Mueller and
11 Demi Haynes joined the meeting, as indicated?

12 MS. SNOW: Objection. Vague.

13 MR. VECCHIONE: They're the people she's
14 going to bring in for the meeting.

15 A. I think they probably did. I don't know
16 if all three of them did.

17 BY MR. VECCHIONE:

18 Q. And what is -- do you know what the role
19 is of a co-lead for consumer vaccine content
20 development is?

21 A. She would help write all the materials on
22 vaccines that were on the website, or in a fact
23 sheet.

24 Q. And do you recall this meeting taking
25 place?

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1 A. I don't recall the specific meeting. I do
2 recall meetings such as -- like this. I mean, maybe
3 it's this one I have in my mind. I don't know for
4 sure.

5 **Q. Well, if it's -- what was discussed at the**
6 **meeting, to the best of your recollection?**

7 A. Sometimes in these meetings they would ask
8 do we know if this is true or false, which is what
9 they were doing. And then if we knew, the
10 communicators knew the answer, we would provide it.
11 If not, I would say, we would say, I'll have to get
12 back to you later, we'll talk to our SMEs.

13 And then that's why I was referring to not
14 going to have an SME going, but we can go back to
15 the group after the meeting if needed was the gist.

16 **Q. Do you have notes or other records of what**
17 **was said on the call?**

18 A. I didn't take notes. I don't believe
19 notes were taken.

20 **Q. But once again, on a calendar you might**
21 **have that calendared?**

22 A. I would have -- the appointment would be
23 there, but it wouldn't necessarily say if Cynthia
24 joined or not. She would have been invited.

25 **Q. All right. And we discussed earlier today**

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1 your conversations with at least Facebook, but some
2 social media on misinformation. And you said it was
3 on -- I think you said it was on a general level,
4 you couldn't remember anything specific.

5 After looking at these documents, has
6 anything changed in your response? Do you remember
7 any specific misinformation you discussed with the
8 social media organizations around here, around 2021?

9 A. I mean, I remember seeing this list before
10 now that you've showed it, but I don't remember what
11 we sent back, or what we said on the phone
12 specifically about each of these items.

13 Q. And did you -- did CDC -- when I say "you"
14 here I mean you or anyone you know at CDC.

15 A. Mm-hmm (affirmative).

16 Q. Ever monitor whether Facebook or other
17 social media company took down material that you
18 have indicated was false?

19 A. I do think that Census was at least
20 periodically checking on things that they had
21 flagged, or they had seen come up.

22 Q. Okay. Thank you. And why do you believe
23 that?

24 A. Because I have vague recollections of them
25 mentioning it or asking it in the meetings, and I

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1 believe that was in one of these exhibits.

2 **Q. Got it. That you reviewed during this**
3 **deposition, or before?**

4 A. In this one.

5 **Q. Okay. You can put Exhibit 11 aside.**

6 A. Okay.

7 (Plaintiffs' Exhibit 15 marked.)

8 BY MR. VECCHIONE:

9 **Q. And let's go to Exhibit 15.**

10 MR. GILLIGAN: Just a moment, Counsel,
11 before you ask your next question.

12 (REPORTER'S NOTE: Mr. Gilligan conferring
13 with witness.)

14 MR. VECCHIONE: The witness has conferred
15 with counsel.

16 BY MR. VECCHIONE:

17 **Q. And, again, I'd just ask you to identify**
18 **it by the subject of the re: line and the date, and**
19 **then continue reviewing it.**

20 MR. GILLIGAN: Referring to Exhibit 15?

21 BY MR. VECCHIONE:

22 **Q. Referring to Exhibit 15.**

23 A. "It was this list, sorry. Agenda item for
24 CDC call this week." It was June 2nd, 2021.

25 **Q. Now, please take a look.**

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1 A. Okay.

2 Q. All right. Now, I think the end of this
3 email is pretty much the same as the one that was
4 Exhibit 14; right?

5 A. It is.

6 Q. So let's just start with the email that's
7 from Liz Lagone to you on May 24 at 1:57 p.m., and
8 she ccs Carrie Adams at Facebook, it looks like,
9 from the email. Who's Carrie Adams?

10 A. She was part of Liz -- of Payton's team,
11 now Carrie is my main point of contact at Facebook,
12 Payton has since left.

13 Q. And can you tell me -- so she says on this
14 email: "Thanks so much again for you and team's
15 help in debunking a few COVID-19 and vaccine
16 misinformation claims for us. As a followup to our
17 meeting, please see the list of claims below with
18 notes from our conversation last Thursday morning."

19 So if this is Monday May 24th, is it fair
20 to say that the meeting was Thursday May 20th, if
21 that's the Thursday of the previous week?

22 A. It appears that way to me too.

23 Q. Okay. So do you recall who met at that
24 meeting, and where it was?

25 A. Well, as we were discussing on the other

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1 exhibit, it was a phone conference, and I think that
2 Cynthia and Rosie and Demi may have attended. I
3 can't say for sure all three of them attended, but I
4 know that they were at least two of them were
5 probably on the line.

6 Q. All right. And she's listed a number of
7 those items that we saw before that they had
8 questions about. And the first one that she lists,
9 although it's not in the same order, she sent it to
10 you earlier; right?

11 A. It does appear in a different order, yes.

12 Q. But, she says: "Is the claim, quote,
13 'COVID-19 is manmade' false, unproven, unsupported
14 by evidence or true?" And the answer's:
15 Inclusive [sic] -- inconclusive; right?

16 And then she also goes on to say: It's
17 probably from animals jumping to humans.

18 And my question here is she says: The CDC
19 director in her testimony yesterday said being
20 manmade was technically possible because we did not
21 know the origin still.

22 And was that the CDC dir- -- I think I
23 saw Walensky in this email beforehand. Is that your
24 understanding of who that is?

25 A. In May that would be Walensky.

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1 **Q. Okay. Now, why is Liz Lagone sending this**
2 **email to you about -- why is she sending this email**
3 **to you to confirm the conclusions below about the**
4 **COVID vaccine?**

5 MS. SNOW: Objection. Calls for
6 speculation.

7 BY MR. VECCHIONE:

8 **Q. You can answer.**

9 A. I don't know why Liz specifically sent it
10 for sure. But I -- because I just mentioned -- when
11 we were talking about the other exhibit -- that we
12 were communicators and not experts, there were
13 probably -- I'm sure we were saying we're pretty
14 sure this is correct. We might have to go back and
15 check on stuff. And I think she was trying to give
16 us something to go and follow up.

17 And I can see I said let's -- I'd like to
18 note that we have no scientific experts on the call
19 so these are our thoughts, but we'll definitely
20 check on this on our end.

21 **Q. Okay. So you didn't -- but you didn't**
22 **respond that she had misheard anything on the**
23 **conversation; right? You just said you needed to**
24 **check with scientists; right?**

25 A. Correct. That's what I said in the email.

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1 Q. Okay. And then I will just to -- later on
2 the COVID-19 vaccine causes various things, these
3 things had been proposed: Alzheimer's, Prion's,
4 cytokine storm. And you respond inconclusive. We
5 don't know right now; right? You just didn't have
6 anything at hand?

7 A. That appears to be what we said on the
8 call, and that Liz, in theory, wrote down what we
9 said correctly.

10 Q. Right.

11 A. That's not clear from this chain.

12 Q. And then --

13 A. But how I'm interpreting it.

14 Q. And then once again the survival rate,
15 they say it's inconclusive but it's a hard number to
16 prove, and -- correct, that's what she says?

17 A. "Not able to debunk now, inconclusive.
18 Scientists would be hesitant to attach a correct
19 number to the survival rates," so.

20 Q. Okay. Yes. And then it says "Note, this
21 claim is tied to the VAERS issue."

22 What's VAERS?

23 A. VAERS is a Vaccine Adverse Events
24 Reporting system.

25 Q. And is it your understanding that doctors

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1 **around the country report adverse events for**
2 **patients as a matter of course?**

3 MS. SNOW: Objection. Calls for
4 speculation.

5 A. I'm not an expert on the system.

6 BY MR. VECCHIONE:

7 **Q. But the system, who puts the information**
8 **there, do you know?**

9 A. I actually believe anyone is able to
10 report an adverse event. It doesn't have to only be
11 physicians. It can be any of us that wanted to.

12 **Q. Okay.**

13 A. I believe.

14 **Q. Right. And so it could be someone who**
15 **doesn't know whether it's connected to the vaccine,**
16 **or someone else?**

17 A. I think any kind of -- any kind of thing
18 can be reported.

19 **Q. Okay. In this email do you know who the**
20 **science experts, the subject matter experts you**
21 **mention in your email, do you know who they were, or**
22 **who you checked with?**

23 A. No. Because people deployed in and out of
24 the response, and I was not usually the person
25 asking the SMEs directly. It was the communicators

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1 assigned to the topic group such as Rosie who was
2 the communicator for vaccines. She was talking to
3 the SMEs.

4 **Q. All right. And then would she talk --**
5 **could she talk directly to Facebook or the other**
6 **social media after that?**

7 A. Almost always she'd send back to me, and I
8 would consolidate responses and send them back.
9 Sometimes if I was out, Rosie would respond directly
10 with a copy to me or something. I don't know that
11 that happened ever, but it might have.

12 **Q. All right. Now, on May 24 at 1:57 she**
13 **does thank you for your and your team's help in**
14 **debunking a few COVID-19 and vaccine misinformation**
15 **claims; correct?**

16 A. Where do you see the thank you?

17 **Q. On May 24th, 2021 at 1:57. The Bates**
18 **stamp at the bottom ends in 539.**

19 A. Sorry. I'm on the wrong --

20 **Q. Yeah.**

21 A. Yeah, she does say that. But then I note
22 that we haven't had scientific experts review this
23 yet right after she sent that to clarify.

24 **Q. All right. But you were going to check**
25 **with them so that it could be debunked; correct?**

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1 A. Correct. If it was supposed to be
2 debunked.

3 **Q. If it --**

4 A. Yes.

5 **Q. Yes, if it was. I thought -- I'm not**
6 **seeing it now. One second.**

7 Ah, here it is on the very first page of
8 **Exhibit 15. Liz Lagone refers to a Sam. "Also I**
9 **meant to ask in my email earlier but I recall it was**
10 **either you or Sam mentioning that you could share a**
11 **transcript." Who's Sam?**

12 A. I assume that was Sam with the Census
13 team.

14 **Q. Got it. And have we talked about him**
15 **before? Is he --**

16 A. We mentioned that he was one of the Census
17 folks. I didn't remember his name until the
18 exhibits, but yes.

19 **Q. And do you know if the transcript of**
20 **Dr. Walensky was just her testimony to Congress, or**
21 **something else?**

22 A. In re-reading this, my recollection is is
23 that they asked about this, and several of us said I
24 think we heard her address this in the press event,
25 or maybe it was the testimony. I'm not sure. I

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1 guess it was the testimony because I was looking for
2 the transcript, and we mentioned it. And we were
3 looking for it because that was the only thing that
4 we knew of that might exist to help them with their
5 question.

6 MR. VECCHIONE: All right. You can put
7 that aside.

8 (Plaintiffs' Exhibit 16 marked.)

9 BY MR. VECCHIONE:

10 **Q. And once again if you could just tell me**
11 **the subject line and the date, and then --**

12 MS. SNOW: And this is Exhibit 16?

13 BY MR. VECCHIONE:

14 **Q. Exhibit 16.**

15 A. "It was this list, sorry. Agenda item for
16 the CDC call this week." June 3rd.

17 **Q. Okay. Now, let's go to the back again.**
18 **And Liz Lagone writes to you on June 1st, 2021,**
19 **8:49 p.m.: "Hi, Carol, I hope you're well and had a**
20 **restful long weekend. I want to follow up on my**
21 **below email and see if you needed any further**
22 **information or context about COVID-19 vaccine claims**
23 **below. We'd love CDC's help in debunking."**

24 **And the next one from June 2nd, 2021 at**
25 **6:58, that's from you; right?**

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1 A. Yes.

2 Q. And that's to Liz Lagone; right?

3 A. Yes.

4 Q. And what -- could you read what you say to
5 her?

6 A. "Notes below on some. I hope this helps.
7 I will let you know when we have cleared points."

8 Q. And then stop there.

9 A. Okay.

10 Q. Then "COVID-19 vaccines causing
11 magnetism." And, surprisingly, "debunked."

12 Then you'll say "will have cleared TP
13 soon." What's TP?

14 A. Talking point.

15 Q. How does a talking point get cleared?

16 Well, I'll withdraw that. What is a talking point?

17 A. Usually it's a bullet or a paragraph on
18 whatever the subject is that one could refer to.

19 Q. And how does it get cleared? What's the
20 process?

21 A. I mean, I'm not sure why I was looking for
22 TP instead of web content. I don't know if that was
23 just a mistype or not, but -- or maybe -- maybe it
24 was going to be a talking point. But usually any
25 content that's going outside of the agency goes

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1 through a very specific clearance process. There
2 was a clearance process for COVID. I wasn't -- I
3 rarely cleared things myself, but there -- many
4 people have to sign off on content before it leaves
5 the Agency.

6 **Q. Got it. And I'll just notice -- I'll just**
7 **point out that the bottom about the COVID-19**
8 **vaccines causing erectile dysfunction, again, you**
9 **say "will have a cleared TP soon"; right?**

10 A. Yeah. I believe thinking more about why I
11 said TP, we often provide media with talking points
12 when they ask questions. And that was -- we were
13 also looking at things that we were providing to
14 media in addition to web content because that was
15 similar, there were similar questions coming. So
16 perhaps that's why this says TP instead of web
17 content.

18 **Q. All right.**

19 A. I can't say for 100 percent sure, but I
20 think that might be likely.

21 **Q. And you use web content in other -- in**
22 **other of these points. So my question there is with**
23 **respect to items 3, 4 and 6, which, I think if you**
24 **look at it, that's what they are.**

25 A. Mm-hmm (affirmative).

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1 **Q. What does it mean that, quote, "web**
2 **content to debunk is in clearance"?**

3 A. Well, I think what we were referring to is
4 posting a more specific kind of FAQ or myth. We had
5 a myths page where we would more directly address
6 the myth. You know, sometimes answers to things
7 were buried in guidance or scientific papers, and we
8 were trying to make it easier for people to
9 understand the myths. So I think this is in
10 reference to adding a myth or an FAQ to the site.

11 **Q. All right. And then you said -- well, my**
12 **next question: So what does CDC do to debunk the**
13 **claims that -- I'll make it more specific here.**
14 **What did CDC do to debunk each of these claims?**
15 **What process does it go through to debunk them?**

16 A. I can't -- I can't answer what the --
17 because that's a scientific process that I'm not
18 part of.

19 **Q. Okay. So they give these questions to**
20 **you, and you send it out to a scientist or a subject**
21 **matter expert, let's call them.**

22 A. Mm-hmm (affirmative).

23 **Q. I take it -- I take it from the responses**
24 **there is a number of different CDC answers. One is**
25 **inconclusive. You say that a number of times. They**

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1 **didn't have the information at that time, is that**
2 **fair?**

3 A. That's my assumption of what was meant by
4 that.

5 **Q. Okay. And sometimes they'd say**
6 **inconclusive, but give here's what we know now?**

7 A. Mm-hmm (affirmative).

8 **Q. And then in other times it's just**
9 **debunked.**

10 **What did you get from the subject matter**
11 **experts when they send that back? Did they just**
12 **send back "debunked," or do they have some reference**
13 **or explanatory note?**

14 A. On -- I think it varied. For this one I'm
15 not sure. I don't remember if I saw all the
16 explanations, or if they were discussed in meetings
17 with the experts. I've seen some that seemed to
18 have a little more description when I have asked it,
19 but -- or well, maybe when I was asking the SME they
20 might have given me, but I was really the one
21 discussing it directly with the SME.

22 **Q. Now you've also described already some**
23 **things they'd already done and put on your website?**

24 A. Yes.

25 **Q. All right. So do you know if CDC**

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1 conducted any experiment or processes to debunk any
2 of these items?

3 A. I wouldn't know.

4 Q. Do you know whether they did surveys of
5 the medical literature of the vaccines?

6 MS. SNOW: Objection. Vague.

7 BY MR. VECCHIONE:

8 Q. In order to debunk claims do you know
9 whether they checked medical literature, or what
10 they reviewed?

11 A. I wasn't part of the scientific process,
12 so I wouldn't even want to speculate.

13 Q. So I think if you look at Exhibit 15.

14 A. Yes.

15 Q. Do you have it? If you go to the
16 second-to-last page it's where they start. And
17 Payton Iheme sends you this list of a number of
18 claims. And the date of that is May 19th; right?

19 A. Yes.

20 Q. And then if you look at 16 by June 3rd at
21 2021, 2:57 you write about the last ones that you
22 hadn't told her about: "Yes, they are debunked and
23 we will also have content on it soon"; correct?

24 A. I see that, yes.

25 Q. All right. So that is about two weeks'

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1 **time to debunk these claims that?**

2 A. That seems like the dates, yes.

3 **Q. So given that short time frame, would you**
4 **agree with me that CDC didn't do any experiment to**
5 **debunk these proposals?**

6 MS. SNOW: Objection. Mischaracterizes
7 the documents and the testimony.

8 A. I feel like it took us two weeks to
9 respond back to Facebook. I don't think it was fair
10 to characterize it as the time it took CDC to
11 potentially collect science on this.

12 BY MR. VECCHIONE:

13 **Q. Thank you. Do you know who -- when you**
14 **give your initial proposals to Facebook, when --**
15 **like the discussions we saw earlier where you said**
16 **those were our discussions but we have to check with**
17 **the subject matter experts, who in that**
18 **conversation, when you're meeting with them, who**
19 **makes those proposals? Is that you, or is that one**
20 **of the co-chairs we mentioned?**

21 MS. SNOW: Objection. Vague.

22 A. What do you mean by proposals?

23 BY MR. VECCHIONE:

24 **Q. Well, they put together these matters to**
25 **be debunked; right? And we saw -- and you can put**

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1 15 next to 16. And if you look at 15, as we
2 discussed earlier, Liz Lagone sends you: This is
3 the conversation we had. It's kind of --

4 MR. GILLIGAN: Which page?

5 MR. VECCHIONE: Page -- on page 15 [sic],
6 second page.

7 MR. GILLIGAN: Thank you.

8 MR. VECCHIONE: Exhibit 15.

9 BY MR. VECCHIONE:

10 Q. So she says, and we've discussed this
11 before: "Please confirm the conclusions I have
12 noted below based on our discussion."

13 So you had a discussion and she got these
14 impressions. But who gave her these impressions?
15 In other words, who was the person in the room who
16 could say, nah, I don't think that's right, but
17 we'll get back to you with the subject matter
18 expert?

19 A. I don't remember this call specifically in
20 any kind of detail, but I do believe it was one of
21 the first times they had sent us a list, and I think
22 that Cynthia and Rosie or Demi, who had a lot more
23 knowledge of the content, piped in mostly on what
24 they thought was available.

25 Q. Okay.

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1 A. But I believe we characterized it during
2 the call that we would need the expert, and I
3 followed up that way at the end.

4 **Q. In the subsequent emails?**

5 A. Yes.

6 **Q. And then -- so then finally there is at**
7 **the end: "Yes, these are debunked" --**

8 A. Mm-hmm (affirmative).

9 **Q. -- and you'll "have content on it soon."**
10 **And that content, is that talking points,**
11 **or is that web content when you use that term?**

12 A. When I use what term?

13 **Q. Content.**

14 A. Web content, it could have been a FAQ on
15 the web, it could have been a myth, it could have
16 been a fact sheet on the web. Anything on the
17 web --

18 **Q. All right.**

19 A. -- that was for consumers.

20 **Q. But you considered that debunked by the**
21 **CDC by June 3rd, 2021?**

22 MS. SNOW: Objection. Vague.

23 BY MR. VECCHIONE:

24 **Q. Well, she says: "Yes, they are debunked**
25 **and we will also have content on it soon" in**

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1 **Plaintiffs' Exhibit 16, June 3rd, 2021.**

2 A. We reported to Facebook that they were
3 debunked at this time.

4 MR. VECCHIONE: Thank you. Exhibit 17.
5 You know what, take this one, too, because it will
6 be real quick, I hope.

7 BY MR. VECCHIONE:

8 **Q. So I'll -- one more question on 16. On**
9 **that June 3rd date where you said these are**
10 **debunked, who makes the final calls that they are**
11 **debunked before you send it Facebook?**

12 A. The communicators or the SME that I'm
13 working with would decide if it was okay to send it
14 back to Facebook. The communicator would get that
15 from the SME that they were working with.

16 For instance, my team posts the web, but I
17 don't know how every piece is exactly cleared, but
18 yet when they send it to us to post it there were
19 trusted people that send it to me, and we assume
20 that it's cleared and we post it.

21 It's very similar. Rosie was also in
22 charge of clearing other things, and so she would
23 assure to me that she had discussed it with the SMEs
24 of authority.

25 **Q. Okay. And do you know of any, the names**

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1 **of any of these SMEs?**

2 A. No, not off the top of my head. I mean,
3 people were in and out of the response, and I don't
4 recall.

5 **Q. All right. I'll ask you to take a look at**
6 **Plaintiffs' Exhibit 16 again.**

7 A. Okay.

8 **Q. Can you read item seven, and the answer on**
9 **-- it's Bates stamped 533. It's on the second page.**

10 A. Of which exhibit?

11 **Q. Exhibit 16.**

12 A. Of 533.

13 **Q. The bottom at the number is called a Bates**
14 **stamp.**

15 A. Oh, sorry.

16 **Q. That page, if you go up -- yeah, not**
17 **everybody knows that and I have to say that --**

18 MR. GILLIGAN: Nobody actually uses a
19 Bates stamp any more either.

20 MR. VECCHIONE: What do they do?

21 MR. GILLIGAN: They're all electronically
22 applied.

23 MR. VECCHIONE: I gotcha. I remember.

24 BY MR. VECCHIONE:

25 **Q. In any event, could you read item 7 from**

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1 **the email that you sent?**

2 A. "People who are receiving COVID-19
3 vaccines are subject to medical experiments."

4 **Q. And then the answer at 7(a)?**

5 A. "Debunked. CDC notes this likely stems
6 from the vaccines only having EUA now and equating
7 lack of full authorization as being involuntary part
8 of a medical experiment."

9 **Q. And WhatsApp EUA?**

10 A. Emergency use authorization.

11 **Q. All right. And that's when the FTC -- FDA**
12 **has given an emergency use authorization for certain**
13 **medicines?**

14 A. This is not my area of expertise, but yes,
15 I believe that's --

16 **Q. That's your understanding?**

17 A. Yes.

18 **Q. So were you aware at this time that**
19 **vaccine mandates had been employed by governments,**
20 **employers and colleges as a condition of maintaining**
21 **employment or enrollment?**

22 MS. SNOW: Objection. Assumes facts not
23 in evidence.

24 BY MR. VECCHIONE:

25 **Q. Have you ever heard of such a thing?**

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1 A. Yes. I don't know --

2 Q. Does getting a vaccine as a requirement of
3 maintaining employment or enrollment affect
4 voluntariness?

5 MS. SNOW: Objection. Calls for
6 speculation, assumes facts not in evidence,
7 argumentative.

8 A. This is really not my area of expertise of
9 any account. I don't have anything really to
10 provide on that.

11 BY MR. VECCHIONE:

12 Q. Did you instruct Facebook to do anything
13 with debunked claims?

14 A. No.

15 Q. Did you have an understanding of what they
16 were going to do with any claims that the CDC said
17 were debunked?

18 A. I knew that they had options, but I think
19 we also discussed on a previous exhibit, which is to
20 inform people, to maybe reduce it in the algorithm,
21 or to remove it. I -- they probably had other
22 options, but I knew of at least those.

23 (Plaintiffs' Exhibit 17 presented.)

24 Q. Thank you. Exhibit 17. And, again, just
25 tell me the subject line and the date.

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1 A. "FB misinformation claims help debunking,"
2 misspelled. The date is 7/26/2021.

3 Q. So on July 26, 2021 it's Liz Langone to
4 you again; right?

5 A. Yes.

6 Q. And she says: "Our Misinformation Policy
7 Team," meaning Facebook's do you believe?

8 A. Yes.

9 Q. "Has identified some claims that we were
10 hoping your team could help us understand if they
11 are false and can lead to harm"; right?

12 A. Yes.

13 Q. And she has spike proteins in COVID-19
14 vaccines, Guillain-Barre syndrome -- which I will
15 use GBS from now on as well -- is possible side
16 effect, and heart inflammation as a possible side
17 effect of all COVID-19 vaccines.

18 Those were the questions that she sent
19 you; right?

20 A. Yes.

21 Q. Do you know why she's asking you, or do
22 you have an understanding? I'll withdraw it.

23 Do you have an understanding of why she's
24 asking you at CDC whether the claims are true or
25 false?

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1 A. Because CDC would have credible health
2 information about the claims or scientific
3 information that would benefit their policy making
4 is the way I understood it.

5 **Q. Okay. And she then asks you she was**
6 **"wondering if your team was aware of any global**
7 **source of truth/database for vaccine adverse effects**
8 **including possibly vaccine-related deaths."**

9 Do you see that?

10 A. Yes.

11 **Q. Did there ever come a time when WHO or**
12 **some foreign medical health agency differed with the**
13 **CDC on any of these vaccine topics that you recall?**

14 A. That's not my area of expertise, and I
15 don't recall any specifics.

16 **Q. Do you know whether on these three**
17 **requests that you did another response on debunking,**
18 **inconclusive, or not known like you did in the**
19 **previous one, exhibits we looked at?**

20 A. I don't remember what I specifically
21 answered with this.

22 **Q. Okay.**

23 A. I know generally what I -- how I handled
24 them, but not what I did with this.

25 **Q. Okay. And generally how you handled them**

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1 **we've already discussed?**

2 A. Yes.

3 **Q. And you have nothing different to add on**
4 **this particular request?**

5 A. No.

6 (Plaintiffs' Exhibit 18 presented.)

7 **Q. Okay. You can go to Exhibit 18. And once**
8 **again could you please give me the subject line and**
9 **the date of Exhibit 18?**

10 A. Yes. CrowdTangle COVID-19 reports.
11 7/20/21.

12 **Q. Okay. And please take a look at it.**

13 A. I've scanned this one.

14 **Q. Who's -- at the top, at the very end, I**
15 **guess I should say the end, the very top?**

16 A. Mm-hmm (affirmative).

17 **Q. It's Carol Crawford to Tyler Woods. Who**
18 **is that?**

19 A. Tyler Woods was a name on another exhibit.
20 I mentioned at that time I'm pretty sure that Tyler
21 Woods took over the reporting from Kelly Perron, and
22 that appears to be the case here. There is a
23 transfer on the first page saying -- from Kelly
24 saying Tyler is going to be sending the reports in
25 the future.

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1 Q. Okay. And once again these are the
2 CrowdTangle reports that I think we discussed at one
3 point you were receiving biweekly?

4 A. Yes.

5 Q. And were you doing anything different with
6 this information at this time than you've described
7 to me earlier?

8 A. Not that I recall.

9 Q. Okay. And at this time, June 9th, 2021,
10 are they reporting this to you for the same reasons
11 as you've described previously when we first
12 mentioned CrowdTangle?

13 A. That's my recollection of it.

14 Q. On the very last page, which is the
15 beginning of it, June 8th, 2021, 8:13 p.m.,
16 "vaccination lawsuits" --

17 A. I see it.

18 Q. -- highlighted. Do you know what they are
19 referring to there?

20 A. Sounds like the lawsuits around the
21 mandates that you mentioned previously.

22 Q. Okay. Like the OSHA mandate or CMS
23 mandates?

24 MS. SNOW: Objection. Assumes facts not
25 in evidence. Calls for speculation.

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1 A. I really am speculating.

2 BY MR. VECCHIONE:

3 **Q. You're not sure?**

4 A. I don't know. This is not really an area
5 of my expertise. This is simply a report of
6 conversations that are occurring on social media.

7 **Q. All right. When you received it, did you**
8 **have an understanding of what the vaccine lawsuits**
9 **they were referring to were?**

10 A. I had a recollection of that from watching
11 the news in my personal life.

12 **Q. Okay. On that same page "Deciding to Get**
13 **Vaccinated" she's highlighted.**

14 **Why does the CDC need to be updated on the**
15 **statements of public physicians?**

16 MS. SNOW: Objection. Mischaracterizes
17 testimony and the document.

18 BY MR. VECCHIONE:

19 **Q. Why were you updated on those statements?**

20 A. Again, these are reports that characterize
21 the overall conversation of social media. They are
22 not -- I don't believe these were picked out
23 specifically for CDC. I think these are a report of
24 the trends of conversation on social media.

25 **Q. And I'd like you to turn to the next page**

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1 where Tyler Woods takes over and he sends a June
2 22nd, 4:43 p.m. summary to you.

3 A. Okay.

4 Q. At the end of it it says: "Let us know if
5 you have any questions or specific keywords/topics
6 you'd like us to explore in the next report. As
7 always, please do not share."

8 Did there come a time that you shared
9 keywords or topics with Facebook that you wanted
10 them to check in?

11 A. I don't recall doing it.

12 Q. All right. Turn to the first page of
13 Exhibit 18. Once again, this is Tyler Woods to you?

14 A. Yes. Sorry.

15 Q. Thank you. The very, very mistake on my
16 instructions at the beginning. You're to be
17 commended, because it usually happens a lot more
18 until now.

19 So the last, the last item that's
20 highlighted: Door-to-door vaccines. Do you know
21 whether he's referring to any public statements made
22 on this topic by any plaintiff in this case,
23 including Governor Mike Parson?

24 A. I wouldn't know.

25 MR. VECCHIONE: You can put that aside.

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1 (Plaintiffs' Exhibit 19 marked.)

2 BY MR. VECCHIONE:

3 Q. And once again please identify it to me by
4 subject matter and date of Exhibit 19, and then
5 please read it to yourself.

6 A. CrowdTangle COVID-19 reports, 8/18/21. I
7 didn't hear your last part of to yourself, what.

8 Q. Just read it to yourself. In other words,
9 you get to review the document but you don't have to
10 read it out loud?

11 A. I'm sorry about that. Okay.

12 Q. I'm not caught up to you.

13 Okay. So as we've discussed, this, once
14 again, is one of the CrowdTangle reports but that
15 Tyler Woods is now sending; correct?

16 A. Yes.

17 Q. Let's go back to the August 3rd exchange
18 on this. So on August 3rd Tyler Woods writes to you
19 at 6:16 p.m.?

20 A. Yes.

21 Q. And once again the purpose of this you've
22 already testified to; it hasn't changed, why you're
23 getting these?

24 A. Correct.

25 Q. All right. So did the CDC at this time

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1 have proof that, quote, "the recent uptick in
2 hospitalizations and deaths is being driven by
3 unvaccinated individuals"?

4 A. I'm not an expert in that area and I
5 wouldn't be able to answer that question.

6 Q. All right. Do you know whether subsequent
7 evidence the CDC had supported that view?

8 A. I'm not an expert in this area, and I
9 don't feel comfortable. I don't know.

10 Q. The email exchange that Tyler would send
11 you on July 20th, 2021, the Bates stamp number at
12 the bottom is 2440 of this document.

13 A. I see it.

14 Q. You there? So, once again, when he sends
15 you material from CrowdTangle concerning allowing
16 people to return to religious services, that's
17 because it's appearing on CrowdTangle and not
18 because you asked for it?

19 A. Correct.

20 Q. And let's go to the first page here, but
21 I'll ask you to take a look at the August 17th
22 exchange. Once again, Tyler Woods sending you the
23 CrowdTangle reports?

24 A. Yes.

25 Q. Now, by August 17th, 2021 are you still

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1 **using CrowdTangle for the same purposes you**
2 **discussed earlier?**

3 A. Yes. But this isn't about us using
4 CrowdTangle. This is about them sending us
5 CrowdTangle reports.

6 **Q. Okay.**

7 A. But either way it's all the same purpose.
8 I just wanted to clarify that.

9 **Q. Okay. Because by now you may be using**
10 **CrowdTangle in a different way. You might be**
11 **getting the summaries and going in directly?**

12 A. Well, we had access to go in directly to
13 CrowdTangle and run in reports I think from early
14 2020.

15 **Q. Okay.**

16 A. And I mentioned that our research team, I
17 think, searched in it and looked in it to create
18 their reports, and I believe other teams did too. I
19 did not personally. These are reports that were
20 sent to us. So that's different than the way you
21 stated it.

22 **Q. I see.**

23 A. I did not use these reports in any
24 different way than I have been saying in previous.

25 **Q. But just to clarify.**

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1 A. Yes.

2 Q. So these are reports from Facebook to you?

3 A. Yes.

4 Q. As we've discussed?

5 A. Yes.

6 Q. I might ask you if something's changed,
7 but you've already testified to that. But within
8 CDC you had access to CrowdTangle, and created your
9 own reports?

10 A. That we could -- I don't know that we
11 created reports. I know that we did searches in
12 CrowdTangle, the same way we do searches in other
13 social media and listening tools that we have to
14 create, to understand what's being discussed in the
15 environment, to update our communication material,
16 as I was explaining this morning.

17 Q. Okay. So on this particular one that
18 we're discussing, once again Facebook has sent you
19 their CrowdTangle summary. And I-- the COVID 19
20 mandates at the bottom there that's highlighted. It
21 says: "On the other hand, many conservative
22 politicians are calling for an end to government
23 mandated restrictions and vaccinations."

24 And my question is do you know whether or
25 not there was any CrowdTangle information about

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1 **either Attorney General Schmitt or Attorney General**
2 **Landry in these CrowdTangle briefings?**

3 A. I'm not -- I wouldn't even say I flipped
4 open this -- every report. I don't know. I
5 couldn't remember any of the details.

6 They did often put pictures of the posts,
7 of a post as examples.

8 **Q. Oh, okay.**

9 A. But I don't know.

10 **Q. That they're finding? Sort of like that**
11 **that attachment we saw earlier where they were**
12 **asking you about the wording? Like, in other words,**
13 **it wouldn't look like this. It would be some**
14 **something they had taken off Facebook?**

15 A. Yeah. But that was -- those samples I
16 feel like you're referencing are different. This
17 would just be like they are saying a lot of people
18 are talking about COVID-19 mandates; they might put
19 a few example posts someone put in the slide deck to
20 show what they were talking about.

21 **Q. Got it. Thank you.**

22 MR. VECCHIONE: Exhibit 20.

23 THE WITNESS: After Exhibit 20, could we
24 take a short break?

25 MR. VECCHIONE: Let's take one now.

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1 THE WITNESS: Could we take one now?

2 THE VIDEOGRAPHER: Off record at 2:06.

3 (Recess 2:06 p.m. - 2:19 p.m.)

4 THE VIDEOGRAPHER: We are back on the
5 record at 2:19.

6 (Plaintiffs' Exhibit 20 marked.)

7 BY MR. VECCHIONE:

8 **Q. Okay. Ms. Crawford, have you had a chance**
9 **to look at Plaintiffs' Exhibit 20?**

10 A. I did.

11 **Q. All right. And could you tell me the**
12 **subject line and who's it from, who's it to and what**
13 **the date is?**

14 A. Yes. The subject is VAERS policy
15 consultation on 8/19, 2021. The first email is from
16 me to Carrie Adams at Facebook.

17 **Q. All right. What's your understanding of**
18 **why the CDC was asking to meet with the VAERS**
19 **experts for consultation about misinformation?**

20 A. I don't recall a lot of the details, but
21 VAERS, the topic of VAERS was an area that was
22 widely discussed on social media, and there was a
23 lot of areas of confusion about what VAERS data was.
24 There was myths about VAERS data, and there was
25 misinformation about VAERS data. So it was always

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1 one of the things that rose to the top in terms of
2 volume of discussion of people were very confused
3 about VAERS.

4 **Q. And do you know whether this meeting ever**
5 **took place?**

6 A. I don't remember if the one we were
7 discussing at this time took place and the Singapore
8 team attended for sure. But we did have a session
9 with the VAERS experts with Facebook.

10 **Q. Okay.**

11 A. Probably as a result of this, I feel like
12 it might have dragged out a little bit after this
13 for a few weeks.

14 **Q. And do you know what was discussed at that**
15 **meeting? First, did you attend it?**

16 A. I did attend it.

17 **Q. And do you recall what was discussed at**
18 **that meeting?**

19 A. We had one of the experts for VAERS,
20 and -- maybe it was two experts for VAERS and a
21 couple of their communication experts on the line
22 with Facebook's team. I believe it was like their
23 misinformation and policy type team like that Liz
24 was part of, but I don't know who -- I don't
25 remember specifically who was on there. And we

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1 offered the SME just to answer their questions about
2 what VAERS was and what it wasn't.

3 And my recollection is they asked a lot of
4 questions like, you know, what does -- what does --
5 who can report something on VAERS and things like
6 that during the session.

7 **Q. Okay. Do you know who the subject matter**
8 **experts on VAERS were at CDC?**

9 A. Goodness. I'm just totally blanking on
10 their names. I'm sorry.

11 **Q. If you recall during the course of this**
12 **deposition, please let me know.**

13 A. Okay.

14 MR. VECCHIONE: We can move on to the next
15 document.

16 (Plaintiffs' Exhibit 21 marked.)

17 A. Thank you.

18 BY MR. VECCHIONE:

19 **Q. And once again if you could just read the**
20 **subject line, and then who -- what the date was and**
21 **then read it to yourself.**

22 MS. SNOW: Is this for Exhibit 21?

23 MR. VECCHIONE: 21.

24 A. Subject BOLO, CDC lab alert and
25 misinformation. September 1st. It's from me to

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1 Carrie Adams at Facebook.

2 I have read it.

3 BY MR. VECCHIONE:

4 **Q. Okay. So do you recall this email?**

5 A. I do now that I'm seeing it, yes.

6 **Q. What are you telling Adams in this email?**

7 A. I can't see the attachment. But there was
8 a misinterpretation of a lab alert that we issued,
9 and so I think we put together a deck -- a power
10 point or a two-page just saying what the facts were
11 about this lab alert.

12 **Q. Okay. What is a lab alert?**

13 A. I don't know if this was a HAN alert or if
14 was some other kind of alert they sent straight to
15 laboratory. So I don't remember the details.

16 **Q. What is a HAN alert?**

17 A. A health advisory alert. We send it --
18 no, Network. Health Advisory Network alert. Sorry.

19 **Q. And you have: "Carrie - BOLO."**

20 **What's BOLO?**

21 A. Be on the lookout.

22 **Q. Why were you concerned about this?**

23 A. Similar to all the other BOLOs, we still
24 thought it was good to point out if we had facts
25 around something that was widely circulating as a

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1 cause of misinformation to the platforms to assist
2 them in whatever they were going to do with their
3 policy or not do. And this was one that was kind of
4 growing, and we had a lot of facts about it, and the
5 team was concerned about this, this
6 misunderstanding.

7 **Q. Do you recall whether Facebook did**
8 **anything upon receiving this information from you?**

9 A. I don't recall.

10 **Q. How did you know that it was a small but**
11 **growing area of misinformation?**

12 A. I vaguely recall that we ran some
13 Meltwater reports, and that people -- that
14 conversation regarding this topic -- Meltwater is
15 sort of like CrowdTangle but for all the
16 platforms -- and that the conversation around this
17 was growing.

18 **Q. Got it. Now, tell me about Meltwater.**
19 **Does it aggregate all the platforms and you search**
20 **across them?**

21 A. Yes. And social media listening tools are
22 used by every social media team, I believe. I mean,
23 it's widely common practice, and, yes, it will
24 search. The CrowdTangle can see more on the Meta
25 properties. So it's nicer if you're just looking at

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1 Meta properties. Meltwater gives you social media
2 at large. The Meta platforms, to clarify.

3 **Q. Do you know what the nature of the**
4 **misinterpretation was? I know we don't have the**
5 **attachment, but do you know?**

6 A. I don't recall any longer.

7 (Plaintiffs' Exhibit 22 marked.)

8 BY MR. VECCHIONE:

9 **Q. Go to Exhibit 22. So what -- before we**
10 **look at that exhibit --**

11 A. Mm-hmm (affirmative).

12 **Q. -- when you said "be on the lookout," what**
13 **did you expect them to do once they were on the**
14 **lookout for Facebook?**

15 A. The same thing I have been describing. I
16 knew that they had various options. They could have
17 just used it to inform people. They could have
18 considered it in their algorithm, I believe. I did
19 understand that potentially removing posts was
20 something that they might do.

21 **Q. So if you could, just please identify**
22 **Exhibit 22 to me the same way by its re: line --**

23 A. Okay.

24 **Q. -- and its date and then read it to**
25 **yourself.**

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1 A. November 2nd, 2021. Subject New Claims
2 and Policy Updates Following EUA Authorization for 5
3 to 11-year-olds.

4 It's from me to a group, but I think
5 primarily it was to Facebook. Also -- never mind.
6 I thought I missed part of the subject. Sorry.
7 Okay.

8 **Q. All right. So this is the first one**
9 **that -- she actually signs off with Meta this time;**
10 **right? So I guess whatever he did took place --**

11 A. I see that.

12 **Q. -- changed over by then.**

13 **All right. The -- can you read the first**
14 **two paragraphs she writes to you on November 2nd,**
15 **1:22 p.m. into the record?**

16 A. Yes. "Kristen, thanks so much for
17 confirming the ability for the claims in question
18 last week having the risk of causing vaccine
19 refusals. And thank you all so much for your input
20 over the last week on our many questions about
21 vaccine misinformation relative to the EUA."

22 **Q. And second paragraph?**

23 A. (As read) I wanted to share that as a
24 result of our work together, when the FDA give
25 emergency use authorization to the Pfizer vaccine

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1 for children last week, we immediately updated our
2 policies globally to remove false claims about the
3 COVID-19 vaccine for children, e.g., the COVID
4 vaccine is not safe for kids, we also launched a new
5 feature on Instagram where accounts that repeatedly
6 post content that violates our polices on COVID-19
7 or vaccine misinformation may now lose the ability
8 to be tagged or mentioned or may see pop-ups asking
9 if they'd like to delete certain posts that violate
10 our policies.

11 **Q. And then she goes on to say: Now we've**
12 **identified new claims; right? And then she lists**
13 **them?**

14 A. Yes.

15 **Q. And she asks you could you tell her**
16 **whether the claim is false, and if believed this**
17 **claim could contribute to vaccine refusals; right?**

18 A. Yes.

19 **Q. All right. And this is similar to the**
20 **other lists she had sent you earlier that we looked**
21 **at to be debunked or not?**

22 A. This is similar. This time, though,
23 they -- I think -- I don't know if this is the first
24 time, but this added the whole "could this
25 contribute to vaccine refusals" element that I don't

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1 think we had on the last one.

2 **Q. Okay. What was your understanding of why**
3 **she was reporting to you Meta's policies on**
4 **childhood vaccines?**

5 MS. SNOW: Objection. Mischaracterizes
6 the document.

7 BY MR. VECCHIONE:

8 **Q. You can answer.**

9 A. Would you reask the question?

10 **Q. Yeah. What was your understanding of why**
11 **she was telling you what Meta's policy was on**
12 **pediatric vaccines?**

13 A. Well, I don't know what -- why she was
14 doing it specifically because I can't speculate on
15 that, but I received it as a thank you for assisting
16 with the claims or the facts about this that we
17 could provide.

18 **Q. And then why did you think she was asking**
19 **you to tell her which claims were true and which**
20 **were false on that further list?**

21 MS. SNOW: Objection.

22 A. Sorry?

23 MS. SNOW: Mischaracterizes the document.

24 BY MR. VECCHIONE:

25 **Q. Okay. You can answer.**

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1 A. Ask the question again.

2 Q. Yeah. What was your understanding of what
3 Langone was asking -- why she was asking you to tell
4 her which of these claims were true and which were
5 false, and, as you said, which would lead to vaccine
6 hesitancy?

7 A. It was still my interpretation that she
8 was asking to inform their policies. They were
9 looking for CDC, who would have the scientific
10 facts, to provide them with scientific facts.

11 Q. And didn't this email give you a pretty
12 good idea that when CDC said something was false
13 that Meta was going to take it down?

14 MS. SNOW: Objection. Calls for
15 speculation.

16 BY MR. VECCHIONE:

17 Q. You can answer.

18 A. I did not have a recollection of this
19 email, and -- when I think about the work we did,
20 but it definitely says here that they updated the
21 policy globally to remove additional false claims.

22 Q. All right. Upon getting your information;
23 correct?

24 A. It doesn't say upon getting our
25 information. It just says that when the FDA gave

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1 the emergency use authorization we immediately
2 updated our policies. It doesn't say upon getting
3 our information.

4 **Q. She goes on to say: I wanted to share**
5 **that as a result of our work together; right?**

6 A. Yes. But I assume this was -- I mean, I
7 don't -- I'm reading it now. I don't have memory of
8 this email. I'm interpreting it more of like the
9 ongoing work for us to provide the facts to them.
10 It could have been something specific, but I don't
11 remember something specific regarding the -- this.

12 **Q. Do you know whether -- and then you say --**
13 **hang on. I'll get back to it.**

14 **You then respond to her on 11/2. I think**
15 **it's 2:54:26. It's down to the second. "Got it,**
16 **Liz. I'm going to work on this one with some other**
17 **vaccine staff and take this one off of Kristen."**

18 **So who are the other vaccine staff?**

19 A. Kristen Nordlund is a press officer for
20 the National Center -- or at the time was a press
21 officer for the National Center for Immunization,
22 Respiratory Diseases where the vaccine work was, and
23 she was very involved in the COVID response.

24 And I don't see it in this chain, and I
25 cannot be sure, but what I think happened was that

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1 Kristen helped on some questions regarding this in a
2 previous set of emails or maybe a conversation.

3 **Q. All right. And then you say: "I hope we**
4 **can do it by Monday."**

5 So it's going to take a little less than a
6 week. But you're going to hope to get back to her
7 by then. This is a Tuesday.

8 A. Yes. I see that, yes.

9 **Q. But then you say: "Thank you so much for**
10 **the feedback on what you've been able to do. This**
11 **is very good to know." Right?**

12 A. I do say that, yes.

13 **Q. So you're approving of her taking down the**
14 **COVID vaccine is not safe for kids off the Meta**
15 **platforms; right?**

16 MS. SNOW: Objection. Mischaracterizes
17 document and testimony.

18 BY MR. VECCHIONE:

19 **Q. You can answer.**

20 A. I did not mean it generally. I never felt
21 that my role, or CDC's role, was to determine what
22 to do with the scientific information that we
23 provided. But I'm happy that providing the
24 scientific information led to less spread of
25 misinformation. In this email I think what's what I

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1 was reflecting.

2 Q. So you were pleased that people who
3 believed that the COVID vaccine was not safe for
4 kids were taken off the platforms of Meta?

5 MS. SNOW: Objection. Mischaracterizes
6 testimony.

7 A. I don't think that's what she's saying in
8 here.

9 BY MR. VECCHIONE:

10 Q. (As read) We immediately updated our
11 policies globally to remove additional false claims
12 about COVID vaccine for children, e.g. the COVID
13 vaccine is not safe for kids.

14 That doesn't tell you that she's removing
15 those people from the platform?

16 MS. SNOW: Objection. Mischaracterizes
17 document.

18 A. No.

19 BY MR. VECCHIONE:

20 Q. What is she doing then?

21 A. I understand that she's removing claims
22 that have -- that are not scientifically accurate.

23 Q. Okay. Well, let me put it another way.
24 People who post that statement will have that
25 statement removed from Meta; correct?

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1 MS. SNOW: Objection. It calls for
2 speculation, mischaracterizes the document.

3 BY MR. VECCHIONE:

4 Q. That was your understanding of this email;
5 right?

6 A. I think we'd have to just look at what's
7 written here.

8 Q. And it is in English; right?

9 MS. SNOW: Objection.

10 MR. GILLIGAN: Argumentative.

11 A. I don't think you're characterizing it
12 correctly. Sorry.

13 (Plaintiffs' Exhibit 23 marked.)

14 BY MR. VECCHIONE:

15 Q. Move on to Exhibit 23. And once again I'd
16 like you to just read the subject line and the date,
17 and then read the rest to yourself.

18 A. New claims and policy updates following
19 EAU authorization for 5 to 11-year olds.

20 This is on November 8th, 2021 from me to
21 Liz and some others at CDC.

22 Okay.

23 Q. All right. So once again in Exhibit 23
24 she's asking you a number of questions, particularly
25 number one was COVID-19 vaccines weaken the immune

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1 system. And then the same question she's asked
2 before: "Is this false? Could this lead to vaccine
3 refusals?" Right?

4 A. Yes.

5 Q. And you've -- and you've responded,
6 "false"; right? "COVID vaccination will help people
7 from getting COVID-19. Adults and children may have
8 some side effects from vaccine which is normal signs
9 that their body is building protection. These side
10 effects may affect their ability to do daily
11 activities but they should go away in a few days.
12 Some people have no side effects, and allergic
13 reactions are rare. Learn how mRNA vaccines work."
14 Right? That's your response to her?

15 A. That I received from the content teams,
16 yes.

17 (Plaintiffs' Exhibit 24 marked.)

18 BY MR. VECCHIONE:

19 Q. Okay. I'm going to give you Exhibit 24.
20 I'll just represent to you this is a report about
21 European's Medicines Agency.

22 Do you know whether or not CDC looked to
23 other worldwide agencies' view of the vaccines in
24 order to inform Facebook on what was true and false?

25 A. That's completely out of my expertise or

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1 knowledge.

2 **Q. Have you seen this document before?**

3 A. No.

4 **Q. And you don't know whether it was used to**
5 **formulate any response you gave to Ms. Lagone?**

6 A. No.

7 MS. SNOW: Objection. Asked and answered.

8 BY MR. VECCHIONE:

9 **Q. That's fine. You said no.**

10 A. (Nods head.)

11 **Q. And then let's look at -- I think I tossed**
12 **my document aside. Yeah.**

13 **I'll direct you to item number six that**
14 **you responded to Lagone about breast milk from**
15 **vaccinated parents, harmful to babies and children.**

16 MR. GILLIGAN: What document you referring
17 to again, John?

18 MR. VECCHIONE: It's number 23. It's
19 number six of the Lagone proposals.

20 MR. GILLIGAN: Thank you.

21 MR. VECCHIONE: You know what, I'm going
22 to let that -- we're going to move on.

23 MR. GILLIGAN: Okay. No objection.

24 BY MR. VECCHIONE:

25 **Q. All right. We're going to Exhibit 26.**

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1 **We're going to skip Exhibit 25.**

2 **(Plaintiffs' Exhibit 26 marked.)**

3 BY MR. VECCHIONE:

4 **Q. And once again I ask you to tell me what**
5 **the subject line is, and the date, and then read it**
6 **to yourself of Exhibit 26.**

7 A. Vaccine misinformation questions for CDC.
8 February 3rd, 2022.

9 I have read it. I didn't read all the
10 questions.

11 **Q. I got. I'll direct you too. So this is a**
12 **long email, so let's go by it in pieces.**

13 A. Mm-hmm (affirmative).

14 **Q. If you see Liz Lagone writes to you on**
15 **February 3rd, 2022 4:36; right?**

16 A. Yes.

17 **Q. The very front page. She says: Hi,**
18 **Carol. And could you please read her paragraph**
19 **there?**

20 A. (As read) I hope your team are well and
21 staying healthy. Thank you so much for the
22 information you provided on claims we asked about
23 last month. Since we last spoke, I wanted to share
24 updates we made as a result of our work together. I
25 also wanted to ask for your assessment of a few

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1 things, including three additional claims we've
2 become aware of from our regular monitoring; how FDA
3 EUA authorization for children under five might
4 impact our policies; and three, CDC's insights
5 regarding deaths from vaccines. As always, please
6 do let me know if it's easier to set up a time to
7 talk. Otherwise could we get input before
8 February 9.

9 **Q. Okay. Time to talk through any of these**
10 **live; right?**

11 A. Excuse me?

12 **Q. I think you just --**

13 A. Oh, did I miss a sentence?

14 **Q. I think you just skipped.**

15 A. Sorry. "Set up a time to talk through any
16 of these live." I apologize.

17 **Q. So what was your understanding of what she**
18 **meant by as a result of our work together?**

19 A. I believe the result of the work together
20 is us providing the scientific information for the
21 questions that they were asking us periodically like
22 these in this email.

23 **Q. All right. And if you'd look -- I'd ask**
24 **you to go to the back of the document, the very**
25 **back. And the first at three, she says: "COVID-19**

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1 vaccines have caused thousands/millions of deaths."

2 And she says: (As read) Under our current
3 policy, we remove posts that claim that COVID-19
4 vaccines kill people or lead to death. We removed
5 these posts on the grounds that the claim is false
6 and that it's harmful because people believe it, it
7 might make them less likely to get vaccinated;
8 right?

9 A. Yes.

10 Q. And then she notes that: In fact,
11 vaccines -- some people might have an adverse
12 reaction that leads to death; right?

13 MS. SNOW: Objection. Mischaracterizes
14 the document.

15 A. I also can't --

16 BY MR. VECCHIONE:

17 Q. Okay.

18 A. I'm not a scientist.

19 Q. I understand that. But she's telling you
20 her understanding. Putting millions and thousands
21 of deaths aside, we have this -- she's bringing to
22 you a problem now.

23 A. Okay. If you'd -- I lost where you're
24 reading from.

25 Q. Okay. So on the last page she says: We

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1 understand that in general COVID-19 vaccines do not
2 cause death. However, we are aware that some deaths
3 have been linked to COVID-19 vaccination such as
4 detailed in this correspondence in The Lancet...
5 reporting death rates from TTS following AstraZeneca
6 vaccination in a number of countries.

7 And then she's saying we're going to
8 reconsider our policies, and she's asking you for
9 your advice; correct?

10 A. She's asking us for scientific
11 information.

12 Q. I'll ask you to go to the second page of
13 this document, which is Bates stamped 1684 at the
14 bottom. And in the middle of the page under number
15 2 of the Claims about COVID vaccines for children
16 under five years of age.

17 And she says: We understand the FDA is
18 considering giving emergency use authorization for
19 COVID-19 vaccine for children under five in coming
20 weeks. We are considering how our existing policy
21 on COVID-19 vaccines (see below) should apply to
22 claims about children 6 months to 4 years once the
23 vaccine is approved for use. Can you please assess
24 for each claim whether it is false for children in
25 this age range and if believed, likely to contribute

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1 to vaccine hesitancy or refusal?

2 And then: Please let us know if it's
3 easiest to set up a time to meet and discuss each
4 one.

5 And then she tells you what their policies
6 are; correct?

7 A. No. I don't -- I haven't interpreted any
8 of this as being the policies. These are the
9 claims.

10 Q. Okay.

11 A. These are the things or -- they're saying
12 are these true or false or unknown.

13 Q. Well, at the first one we read, though,
14 they -- she did tell you under our current policy,
15 remove posts that claim COVID-19 vaccines kill
16 people or lead to death; right?

17 A. But the policy is not the same as the
18 claims. The claims are the -- what she's asking us
19 about, which is I know that they're using our
20 scientific information to determine their policy,
21 but they're asking us about the science.

22 Q. Okay. And your response was: "PS - the
23 update is very helpful. Thank you for including
24 that." Right?

25 A. Yes.

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1 **Q. But and in this you don't respond on**
2 **whether anything's debunked or not?**

3 A. Yes. I don't remember if we did or not.

4 **Q. And what did you find helpful about this?**

5 A. I think what I think is helpful for us is
6 to have her ask us specifically what she needs input
7 on. So it's been helpful when she started just
8 sending us the things she's wanting us to do.

9 I also think it is helpful to know that
10 they're actually using the responses that we have in
11 some form or fashion because it takes time to put
12 them together.

13 **Q. Thank you. You can put that aside.**

14 A. Okay.

15 (Plaintiffs' Exhibit 27 marked.)

16 BY MR. VECCHIONE:

17 **Q. And just again tell me the subject matter,**
18 **the date, and then read it to yourself.**

19 A. Okay.

20 MS. SNOW: What exhibit is it?

21 MR. VECCHIONE: Exhibit 27.

22 A. Have five minutes to chat. E: Vaccine
23 Misinformation questions for CDC February 4th, 2022.

24 Okay.

25 (Reporter clarifying exhibit number.)

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1 BY MR. VECCHIONE:

2 Q. All right. And I think this is the same,
3 at least part of the email is the same, as the last
4 one we looked at; right?

5 A. I agree.

6 Q. But there is a different chain on top of
7 hers saying she -- the part where she says she hopes
8 you and your team are well and staying healthy.

9 A. Can I see 26?

10 Q. When you say on February 3rd at 5:21:
11 I'll talk to the vaccine program and see what I can
12 do -- or what we can do. Excuse me. You say: I
13 will talk to the vaccine program and see what we can
14 do; right?

15 A. Yes.

16 Q. Is that to have a meeting on these
17 questions that she'd presented?

18 A. Well, I mean, I guess it could have been a
19 meeting, but I was -- I was meeting -- I'll see if
20 they could -- it was a lot of claims she gave in
21 this email.

22 Q. Right.

23 A. And I was thinking I don't know that we're
24 going to be able to address all of these. So I
25 think I was thinking I would talk to them and see if

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1 would even be willing to look at this many of them
2 because she's asking for input on them within a
3 couple of days.

4 **Q. And it would be difficult to give input on**
5 **all those questions that quickly?**

6 A. I thought so.

7 **Q. And do you know if this phone call**
8 **occurred that you say at the very top of it in**
9 **Exhibit 27?**

10 A. I don't know for sure. I think that she
11 called, and I just said, look, I don't think that
12 we're going to be able to -- I was going out of
13 town. I do remember that much. I think I -- I
14 think she may have called, or I had emailed her
15 separately when we didn't catch up, and said I don't
16 think we're going to have it this quickly, it
17 probably will be when I return.

18 MR. VECCHIONE: Aren't you glad you came?

19 MR. KUMAR: Make myself useful, yeah.

20 (Plaintiffs' Exhibit 28 marked.)

21 BY MR. VECCHIONE:

22 **Q. And once again I'd ask you to read, for**
23 **Exhibit 28 read the subject line and the date and**
24 **read it to yourself.**

25 A. Okay. COVID Misinfo Project. 3/23/2021.

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1 Okay.

2 **Q. Okay. We have a new cast of characters.**
3 **I'd like you to take a look at the bottom here, the**
4 **March 18, 2021 portion of the email chain.**

5 A. Yes.

6 **Q. And that's from you to Stanley Onyimba at**
7 **a Google -- it's [REDACTED] [REDACTED]@google.com and Jan**
8 **Antonaros at -- [REDACTED]@google.com.**

9 **Do you recognize those names?**

10 A. Yes. And Stanley was the name I couldn't
11 remember when you asked me who my POCs were at
12 Google.

13 **Q. Okay. Stanley.**

14 **So you wrote to them on March 18 -- well,**
15 **read that out loud to me what you wrote to them:**
16 **"Stanley/Jan"?**

17 A. (As read) As I believe we discussed
18 previously, CDC is now working with Census to
19 leverage some of their infrastructure to help
20 identify and address COVID vaccine misinfo. As I
21 understand it from the Census team, when they were
22 doing this for the Census project last year, they
23 met regularly with a Google/YouTube Trust team. Is
24 it possible for us to start regular meetings on this
25 topic or maybe use our existing time? Let us know

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1 if you want to discuss in more depth.

2 **Q. All right. So what did you mean by CDC is**
3 **now working with Census to leverage some of their**
4 **infrastructure to help identify and address COVID**
5 **vaccine misinfo?**

6 A. That was the work of the IAA with Census
7 to help consult and work with us on the COVID
8 misinformation information. I just -- put COVID
9 information one time. That's what I'm referring to
10 here. This is more specific. This is when I refer
11 to infrastructure, I was referring to the fact that
12 Christopher ran those reports and looked for
13 misinformation on these areas for us.

14 **Q. All right. And you refer to the Census**
15 **project last year in which they met -- meet**
16 **regularly with Google YouTube Trust team.**

17 **Was that a different project?**

18 A. That was their -- I believe this was the
19 2020 Census.

20 **Q. And that's what you think you're referring**
21 **to there?**

22 A. Yes.

23 **Q. Do you know whether or not the Census**
24 **engaged in content moderation with Google?**

25 A. I don't know.

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1 MS. SNOW: Objection. Vague.

2 BY MR. VECCHIONE:

3 Q. So and here I am not using censorship --
4 anyways, still drawing objections.

5 All right. Let's take a look at
6 March 23rd, 2021. Jan Antonaros to you, and cc's
7 Stanley Onyimba. Can you read that response out
8 loud?

9 A. Yes. But before I do, I want to go back
10 to the clarification that she objected. When you
11 asked me did Census do content moderation, I assumed
12 you meant for the Census project, and I answered for
13 that.

14 Q. Okay. How about for --

15 A. I wondered if there was more vagueness
16 to --

17 Q. And how about for the COVID-19 vaccine
18 project?

19 A. Not to my knowledge either.

20 Q. Okay.

21 A. But I thought you were referring to their
22 project.

23 Q. All right. So please read Mr. Antonaros'
24 response to you.

25 A. Hey, Carol -- or "Hi, Carol, Thank you for

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1 your patience as we identified the right colleagues
2 from Google to pull into this effort. Would it be
3 possible to schedule a call for later this week to
4 learn more about how the CDC and Census envision
5 working together on this important topic."

6 **Q. What was your understanding of what**
7 **Antonaros meant by the right colleague from Google**
8 **to pull into this effort?**

9 A. I believe she was going to ask people on
10 their trust team, or whatever their name for their,
11 that kind of team is.

12 **Q. Okay. Did you -- do you know now or did**
13 **you know then who these people were and what their**
14 **titles were, or are?**

15 A. No. I mean, I might have known then.
16 They may have participated in the meeting.

17 **Q. But you can't remember now?**

18 A. But I don't know their names now.

19 **Q. And what's your response to him?**

20 A. "Sounds good to check in first -- would
21 Friday around 3:30 work?"

22 **Q. All right. And do you know whether or not**
23 **you had that call with him?**

24 A. I don't remember.

25 **Q. All right. So you don't recall who was on**

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1 **the call besides you, if it took place?**

2 MS. SNOW: Objection. Mischaracterizes
3 testimony.

4 A. I --

5 MS. SNOW: Sorry.

6 (Inaudible crosstalk.)

7 MR. VECCHIONE: I'll rephrase.

8 BY MR. VECCHIONE:

9 **Q. You don't recall whether the call happened**
10 **and who was on it?**

11 A. Correct.

12 **Q. All right. And do you know whether you'd**
13 **have a calendar with that call on it, by any chance?**

14 A. If we had a call, we typically had a
15 calendar appointment.

16 **Q. Okay. All right. And what was -- you say**
17 **"sounds good to check in first."**

18 **What did you want to check in with him**
19 **for? What were you -- what did you want to talk**
20 **about first?**

21 A. I mean, I'm doing this from reading the
22 email. I think she's saying let's check in before
23 our regular meeting.

24 **Q. Okay.**

25 A. I think that's what -- I mean, that's how

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1 I interpreted the "check in first."

2 **Q. And by this time were you already having**
3 **regular meetings with Google like we've seen with**
4 **Facebook?**

5 A. Yeah. This was in 2021. So we had been
6 meeting pretty regularly with Google by this time.

7 MR. VECCHIONE: Okay. You can put that
8 aside.

9 (Plaintiffs' Exhibit 29 marked.)

10 BY MR. VECCHIONE:

11 **Q. Let's try Exhibit 29. Same thing, read me**
12 **the subject line, the date, and then take a look at**
13 **it.**

14 A. Okay. Okay. Subject line's: Followup on
15 misinformation, or misinfo conversation. It's
16 4/5/2021.

17 THE WITNESS: Can I see this?

18 MS. SNOW: Yes.

19 A. Okay.

20 BY MR. VECCHIONE:

21 **Q. All right. So can you go to the very end,**
22 **I guess, the very last page, read what you said on**
23 **March 29 at 9:52.**

24 A. "Are you all open to using our regular 4pm
25 meetings to go over things with Census, or what is

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1 preferred? I wasn't clear how interested you all
2 were on this effort or who the players are on your
3 end."

4 **Q. So what were the regular 4:00 p.m.**
5 **meetings you refer to?**

6 A. I think -- because I still have a
7 4:00 p.m. meeting every other Monday with Google. I
8 think that these were the same every-other-week
9 check-in meetings. Sometimes we wouldn't have them.
10 Sometimes we would have them and discuss things.

11 **Q. Did you have similar regular meetings with**
12 **the other platforms we've been discussing, Face- --**
13 **Meta and Twitter?**

14 A. We -- you asked some of this earlier.

15 **Q. I did.**

16 A. The same answer. So we had regular
17 meetings with Google, and we had regular meetings
18 with Meta. Most -- you know, the frequency changed.
19 So, you know, I don't meet as often. I mean, Google
20 we meet every other week. Right now with Meta it's
21 more ad hoc.

22 **Q. Okay.**

23 A. We had had a regular meeting with
24 Pinterest for a short period of time, and we had my
25 memory was just more ad hoc meetings on occasion

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1 with Twitter.

2 Q. So on the regular meetings with either
3 Google or Facebook?

4 A. Mm-hmm (affirmative).

5 Q. Well, let me ask the question this way.
6 From the CDC end, were the same people usually
7 attending those meetings with each social media?

8 A. It could vary. I mean, I was always -- I
9 mean, with Google, it was typically me and Fred
10 Smith, who's our technical lead, because often the
11 Google questions would be more about technical
12 implementations that we might have to work on. We
13 were usually always on it. Sometimes I would --
14 depending on the subject, I would bring in other
15 people.

16 With Meta, I was pretty much always on
17 there. Jay typically listened in. And then I would
18 bring people in depending on the subject.

19 Q. All right. And what were the -- were the
20 topics typically misinformation, or technical
21 subjects?

22 A. They -- by and large, they were mostly
23 about things other than misinformation; though
24 misinformation was discussed in the meetings. But
25 they were originated about getting our credible

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1 information out to our audiences and some of the
2 examples I gave this morning.

3 **Q. Okay. And what did you mean by with we're**
4 **going to check with -- "to go over things with**
5 **Census, or what is preferred"? What does that mean?**

6 A. I don't -- I don't have direct memory of
7 it. I'm only assuming that -- what I recall doing
8 is asking through this chain is like is it okay if
9 we bring Census in? Do you like -- what format is
10 best to talk about misinformation?

11 Maybe we didn't resolve it on this call
12 from the previous exhibit. I can't say for sure
13 what I meant by it.

14 **Q. Okay. And then could you read Onyimba's**
15 **response to you on that, following that on**
16 **March 29th?**

17 A. (As read) We would like to follow up on
18 our discussion with your colleague, Cynthia, on
19 vaccine information a few months ago. Specifically,
20 we plan to share a new list of common vaccine
21 misinformation claims and would love it if Cynthia
22 or other vaccine experts can join. We can also save
23 a few minutes for me, you and Jan to discuss
24 potential next steps regarding Census, but will not
25 need the broader team for that discussion.

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1 **Q. So who's Cynthia?**

2 A. Cynthia Jorgensen, which was on a previous
3 exhibit. She was the -- I mean, at the time of the
4 other exhibits, she was the co-lead and the
5 associate director for communication. I don't know
6 what role she was -- she was definitely the ACS
7 during this. I don't know if he was in their JIC
8 during this period of time.

9 **Q. Do you know what vaccine information she**
10 **provided to Google?**

11 A. I don't recall specifically. But they --
12 so they were trying to be sure that they had the
13 right information when someone Googled something.
14 When you Google COVID, for instance, there are these
15 little tabs that come up. They'll say, like,
16 symptoms, treatment, vaccines. And that content,
17 some of the things came from the CDC website. So
18 from time to time they wanted to update information
19 like that, and would ask us to have an expert on
20 that could talk about it.

21 **Q. Got it.**

22 A. I don't remember this question, but I'm
23 sure that's what it's in reference to.

24 **Q. All right. Do you know what Google did**
25 **with the list of common vaccine misinformation**

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1 **claims?**

2 A. I don't remember the list of claims, or
3 what the format was or what they asked us about it.
4 Maybe if you have future exhibits I'll remember, but
5 I don't recall from this.

6 **Q. All right. And then he says and -- "can**
7 **save a few minutes for you, me and Jan to discuss**
8 **potential next steps regarding the Census but will**
9 **not need the broader team for the discussion."**

10 **Is that your understanding that it's a**
11 **discussion about Census, or with Census, like are**
12 **they there?**

13 A. I don't know for sure what this was in
14 reference to. But it -- I think that it is in
15 reference to discussing how to engage on an ongoing
16 basis about misinformation and the Census suggestion
17 that we have regular meetings with them just on that
18 topic.

19 **Q. I got it. And you respond that you're**
20 **going to get those subject matter experts on the**
21 **next call?**

22 A. Yes.

23 **Q. I think I might as well add, and Census**
24 **won't be there, but you'll discuss how to engage**
25 **with them. Is that the meaning of that, that they**

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1 are not going to be at the next meeting but we'll
2 talk about them?

3 A. That's my assumption.

4 Q. Okay.

5 A. I don't know if it's because they weren't
6 available, or if there was some reason we didn't
7 invite them.

8 Q. Do you recall what your discussion with
9 Census was about Google at that time?

10 A. I don't recall, but I still believe this
11 is just about how to engage more regularly about
12 misinformation, or whatever -- whatever Census had
13 done with Google and YouTube, should we have a
14 similar structure with CDC. I believe that is what
15 is not resolved in these chains.

16 Q. All right. And then Mr. Onyimba asked you
17 another question on Friday April 2nd, 2021.

18 A. Mm-hmm (affirmative).

19 Q. He says: "Thanks again for your time this
20 week. Attached are some of the claims we discussed
21 for your reference," and they are not attached so we
22 can't see those. But it says: "On a separate but
23 related note would you happen to know if the CDC has
24 statistics on hospitalization or death for people in
25 the 40-49 age category who do not have underlying

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1 **health conditions or co-morbidities?"**

2 **You see that?**

3 A. Yes.

4 **Q. Do you know why he was asking you that?**

5 A. No, I don't know why he was asking me
6 that.

7 **Q. And you responded on April 5th that you**
8 **couldn't respond over the weekend, but then you -- I**
9 **think you sent him this chart?**

10 A. Yes.

11 **Q. What is that chart?**

12 A. I thought that this chart would answer his
13 question. It's the -- it was from the CDC's data
14 tracker. It's a chart on hospitalizations.

15 **Q. But it's a chart of people with asthma;**
16 **right?**

17 A. That's -- the link worked -- you could --
18 that's a drop-down where you can pick anything you
19 want I think I'd screenshot so he'd know what was
20 going to be on the link.

21 **Q. So you could pick without asthma if you**
22 **wanted?**

23 A. Yeah. I think I just was showing him what
24 it was.

25 **Q. Okay.**

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1 A. But the link was more interactive.

2 **Q. Okay. And so if he went there, if you go**
3 **to this website, theoretically he can take out**
4 **asthma and put in whatever age range he wants?**

5 A. Mm-hmm (affirmative). And you could pick
6 a different major category or an age.

7 MR. VECCHIONE: Thank you. Put that
8 aside.

9 (Plaintiffs' Exhibit 30 marked.)

10 BY MR. VECCHIONE:

11 **Q. Plaintiffs' Exhibit 30. Again, could you**
12 **just tell us the subject matter and the date and**
13 **then read it to yourself.**

14 A. Subject: Follow up on mis-info
15 conversation. 4/12/21. 4 -- yeah, 2021. Sorry.
16 Okay.

17 **Q. So would you agree with me that this is**
18 **also, if you look at Plaintiffs' Exhibit 29, that**
19 **bottom link you had sent is the same link, and then**
20 **there is just a new chain on the top of this?**

21 A. Yes.

22 **Q. And then you ask him: "Can you give me an**
23 **idea what topics we'll be covering? But yes, I'll**
24 **ask them to attend."**

25 I guess we ought to read. Could you

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1 **please read to me what question he asked you?**

2 A. "For tomorrow's call would it be possible
3 to include Cynthia or other COVID-19 treatment SMEs
4 to follow up on some additional questions?"

5 Q. **And then you say: "Can you give me an**
6 **idea of what topics we'll be covering? But, yes,**
7 **I'll ask them to attend"?**

8 A. Yes.

9 Q. **Was this a BOLO meeting or a regular**
10 **meeting? Like, was this for something that had just**
11 **occurred that you wanted to alert them to, or was**
12 **this a regular meeting?**

13 A. I don't believe this was a BOLO meeting
14 because I don't think we had started BOLO meetings
15 in April. I think we started those in May. I don't
16 know for sure, but I don't feel like that's what
17 this was.

18 I -- without that attachment, I don't
19 remember what it was, but it wasn't uncommon for
20 them to have just general questions about things and
21 ask us to bring people to a meeting to help go over
22 it. Maybe they were trying to display something in
23 the search or whatever. I just -- I don't remember
24 this context.

25 (Plaintiffs' Exhibit 31 marked.)

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1 BY MR. VECCHIONE:

2 Q. All right. Go to Exhibit 31.

3 A. Thank you.

4 Q. Once again for Exhibit 31 could you tell
5 me the date and the subject matter line, and then
6 read it to yourself.

7 A. Subject: Omicron page. Sent December 21,
8 2021.

9 Okay.

10 Q. All right. We can go to the back again,
11 the last page. And you have an email exchange you
12 sent on December 21, 2021 at 10:38?

13 A. Yes.

14 Q. Who did you send it to?

15 A. That's -- I -- probably to Jan and
16 Stanley.

17 Q. Okay. And why are you sending information
18 about Omicron-specific pages to them?

19 A. Very similar to how I described how we've
20 been working with them. This was a really big thing
21 at the time, and they are trying to also be sure
22 that people can find things in the search results,
23 and they were -- they were highlighting CDC content
24 and what they -- I call it the knowledge panel,
25 those little tabs on Google.

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1 So, if something big like this was
2 happening I would let them know if we had new key
3 pages that they were likely getting a high number of
4 searches on. And I'm pretty sure everyone was
5 searching for Omicron around December of 2021. So
6 that is why I sent it to them so they would have
7 awareness of this brand new piece of content, and
8 because I was seeing this -- I know. I have a
9 point.

10 **Q. Right.**

11 A. This is a screenshot of what I call the
12 knowledge panel with the tabs, and it wasn't coming
13 up with the newer piece of content. So I wanted to
14 alert them to it.

15 **Q. Okay. So what you've cut and pasted I**
16 **think in there, says, like, coronavirus virus**
17 **disease, and then there is overview statistic**
18 **symptoms?**

19 A. Yes.

20 **Q. And then below it has the information on**
21 **variants.**

22 A. Mm-hmm (affirmative).

23 **Q. All right. So let me understand this,**
24 **because I'm not quite sure I'm getting it.**

25 **You say: "I see our main Variant page."**

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1 **That means CDC's variant page; right?**

2 A. Yes.

3 **Q. "Is coming up at the top of the**
4 **Omicron/variant panel."**

5 **What -- was that Google search?**

6 A. Yes.

7 **Q. Or what are you referring to then?**

8 A. So this -- when you search Google, you
9 would get -- this is a screenshot --

10 **Q. Got it.**

11 A. -- of the Google results.

12 **Q. Okay.**

13 A. This is not our site. This is their site.
14 They have these little things that say overview
15 symptom -- I mean, statistic symptoms. Some of
16 these were populated by CDC's content. There was
17 one here that's cut off that said variants.

18 **Q. Got it.**

19 A. That was going to just the general
20 variants page. But I know people were looking --
21 because we'd saw all the search terms, they were
22 looking for Omicron specifically, and I wanted to
23 make them aware that they may want to swap the links
24 out.

25 **Q. Okay. And so you said: "So I want to be**

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1 **sure you were aware that this Omicron specific page**
2 **is maturing and I expect further updates."**

3 **What does that mean, the Omicron-specific**
4 **page is maturing? The one at CDC?**

5 A. Yes. This was our page, like -- you know,
6 this is pretty early in the Omicron, I believe, I
7 don't have the timetable in it, but -- so we're
8 always updating our web pages as situations changes.
9 So I don't think this -- at the time I sent it I had
10 just tons of concrete information, but it -- we were
11 going to add to it, and I thought it was a better
12 place to send people that were searching for
13 Omicron.

14 **Q. And what did you want them to do with it?**

15 A. Well, they have always been clear that the
16 search results are not something that they mess
17 with, but this part, the knowledge panel, is
18 something that they manually assembled and worked
19 with us on. So I thought they might want to switch
20 this. (Indicating.)

21 **Q. Got it. And then he responds -- at least**
22 **it looks like Jan Antonaros responds to you; right?**

23 A. Jan does, yes.

24 **Q. "Thanks for heads up. Our health team,**
25 **including our Chief Health Officer, is tracking U.S.**

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1 **federal announcements today closely. Stanley and I**
2 **will take this back to our team."**

3 **Do you know who the chief health officer**
4 **was?**

5 A. I think -- I think it may be Karen
6 DeSalvo.

7 **Q. Okay.**

8 A. But on their end. That's their chief
9 health officer. I think that's her title.

10 **Q. And when he says tracking U.S. federal**
11 **announcements today closely, does he mean on Google?**
12 **What does he mean by that, in your understanding?**

13 MS. SNOW: Objection. Calls for
14 speculation.

15 BY MR. VECCHIONE:

16 **Q. What did you understand that term?**

17 A. I don't remember. I'm guessing there was
18 some announcements then, but I don't recall.

19 **Q. Had Google been instructed by the CDC to**
20 **update following the CDC guidance?**

21 A. To update what?

22 **Q. To update their search engine, or for**
23 **their panels to follow the CDC guidance?**

24 MS. SNOW: Objection. Compound.

25 BY MR. VECCHIONE:

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1 **Q. You could answer if you understand.**

2 A. We did not instruct Google to update their
3 search engines, or their panels. But I did suggest
4 that -- and he said about CDC guidance. This was --
5 this wasn't about -- this was a consumer page about
6 what people would need to know about Omicron. I --
7 it was more of just correcting what I thought was a
8 better link in the panels that we had provided input
9 on before.

10 Google is already -- has always made it
11 clear that the search engine is sacred. There is
12 nothing we can say to have them fix their search
13 engine, or change their search engine to something
14 else.

15 **Q. All right. But how about the panel**
16 **itself? What -- I guess what I'm trying to**
17 **understand is what -- you send them this panel --**
18 **because apparently it's going to the wrong place on**
19 **the CDC -- if you put in certain search terms, it's**
20 **going to the wrong place on the CDC website?**

21 A. So I think what's hard to understand about
22 this is this is not a typical way that Google
23 presents things. You will have to ask Google how
24 they considered when they added it. But my
25 perception is that because of the substantial demand

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1 of searches for COVID, they added this that I call a
2 knowledge panel. I think they may have another word
3 for it. So that there is this layer before the
4 search results come up, and it looks like this
5 screenshot.

6 **Q. What you're pointing --**

7 A. But normally when you search, you don't
8 get that on other topics. I think they do have it
9 for a few other topics, but I rarely run into it
10 when I do searches.

11 **Q. Okay. And then on December 21st I think**
12 **Stanley Onyimba writes to you?**

13 A. Yes.

14 **Q. And he again said he explains how it's**
15 **working and what they are going to do; right?**

16 A. Yes.

17 **Q. And then he says again: "As Jan mentioned,**
18 **we are tracking announcements closely and will**
19 **continue to update our products to reflect the**
20 **latest guidance."**

21 **What did you understand that to mean?**

22 A. I think he is saying -- I -- gosh, I don't
23 remember what was happening the week of December 21.
24 There seems to be a reference to announcements that
25 I just, at this moment I'm not sure. So I think I'm

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1 missing some context to what he's saying.

2 **Q. And at the top?**

3 A. Mm-hmm (affirmative).

4 **Q. Then you say: "Glad you all are**
5 **tracking." You sign off.**

6 A. That would mean I'm glad you're watching
7 what's happening, but I don't -- unfortunately, I
8 can't remember what was happening that week that
9 they're referencing. But when they say reflect the
10 latest guidance, what I believe he's referring to is
11 what I said before is that we helped populate some
12 of these tabs.

13 **Q. You can put that aside.**

14 A. Okay.

15 (Plaintiffs' Exhibit 32 marked.)

16 BY MR. VECCHIONE:

17 **Q. Exhibit 32. And once again I'll ask you**
18 **for Exhibit 32 to read the subject line and the**
19 **date, and then read it to yourself.**

20 A. Subject: Request for problem accounts.
21 Sent April 9, 2021.

22 Okay.

23 **Q. All right. This is from you to Todd**
24 **O'Boyle at the top. And then it's from Todd O'Boyle**
25 **to you at the bottom, right, on April 8th, 2021?**

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1 A. Yes.

2 **Q. Can you read what he writes to you, and**
3 **then your response?**

4 A. "Hi, Carol, I'm looking forward to setting
5 up regular chats; my team has asked for examples of
6 problematic content so we can examine trends. All
7 examples of misinformation are helpful, but in
8 particular, if you have examples of fraud such as
9 fraudulent COVID cures, fraudulent vaccine cards,
10 et cetera, that will be very helpful."

11 And I said: "Yes, we will get back to you
12 early this week."

13 **Q. "Thanks for checking in"; right?**

14 **So did you -- had you talked to Todd**
15 **O'Boyle before this exchange?**

16 A. I don't recall. But I think this is
17 around the time that Census was helping us, and I
18 believe I asked Todd, similar to I asked the other
19 ones, like: Is there a good way that we should
20 start engaging on misinformation? And this is
21 probably a followup to either that email or phone
22 call.

23 **Q. And so first, who's Todd O'Boyle? And he**
24 **says at Twitter.com, so I assume he's at Twitter?**

25 A. Yes, Todd's at Twitter. And I know he was

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1 a point of contact that I received for the topic of
2 misinformation. I don't know what his title was
3 specifically.

4 **Q. Okay. Have you ever met him in person?**

5 A. No. And as a clarification, I think I
6 called him Todd O'Brien when you asked me earlier
7 who the POCs were. Until I see this, I didn't
8 remember his name correctly.

9 **Q. So O'Boyle, different, yes.**

10 A. Yes.

11 **Q. That's fine. At this time did you set up**
12 **regular meetings with Twitter?**

13 A. My memory is is that we never got regular
14 meetings with Twitter set up. I mean, around this
15 time. I know they participated in the BOLO
16 meetings, but I don't recall any kind of regular
17 schedule with them. I don't remember many occasions
18 we actually got on a phone call and discussed
19 anything during COVID. There was a couple, but not
20 many.

21 **Q. How many BOLO meetings did you have with**
22 **the social media companies from the beginning of**
23 **COVID to, say, now?**

24 A. I think that we only had two. And then I
25 think that I sent one time a -- in lieu of a meeting

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1 a PowerPoint. And I didn't recall it but we sent
2 another PowerPoint regarding that lab issue that was
3 in a previous exhibit.

4 **Q. Do you know who directed Mr. O'Boyle to**
5 **send misinformation on Twitter to you?**

6 MS. SNOW: Objection. Mischaracterizes
7 testimony.

8 A. Say again.

9 BY MR. VECCHIONE:

10 **Q. Excuse me. Do you know who directed him**
11 **to ask you for examples of misinformation?**

12 A. No.

13 **Q. And do you know whether you sent him any?**

14 A. No.

15 **Q. Okay.**

16 A. Could --

17 **Q. Yeah, go ahead.**

18 A. Can I get you to clarify? What do you
19 mean by directed him to?

20 **Q. I just wanted to -- I'll put it this way.**
21 **Todd O'Boyle was your point of contact with Twitter?**

22 A. Yes.

23 **Q. Was -- did you know of anyone over him**
24 **telling him to do things?**

25 A. That's how I interpreted it. No.

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1 **Q. He says that examples of misinformation**
2 **are helpful, particularly fraud. Do you know what**
3 **he was doing that it would be helpful to him to get**
4 **this information?**

5 A. I don't remember the exact context of this
6 email, but I believe, as I mentioned before, this
7 was probably part of me saying how could we work
8 together on misinformation.

9 And it sounds like he's kind of wondering
10 what we're seeing that we want to bring up, and he's
11 asking for some examples. This is how I'm reading
12 it now. And it sounds familiar based on what we,
13 you know, my memory of this time.

14 MR. VECCHIONE: You can put that aside.

15 (Plaintiffs' Exhibit 33 marked.)

16 BY MR. VECCHIONE:

17 **Q. Exhibit 33. And once again please read**
18 **the subject matter and the date, and then read it to**
19 **yourself for Exhibit 33.**

20 A. Twitter CDC examples. 4-13-21 xlsx is the
21 extension. 4/14/2021.

22 **Q. Can you read his request to you, and then**
23 **your response?**

24 A. This is the same email from before. "I'm
25 looking forward to setting up regular chats. My

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1 team has asked for examples of problematic content
2 so we can examine trends. All examples of
3 misinformation are helpful, but in particular, if
4 you have examples of fraud such as fraudulent COVID
5 cures, fraudulent vaccine cards, et cetera, that
6 would be very helpful."

7 **Q. And then this time you respond, though?**

8 A. Yes. I didn't recall if we sent them, but
9 we did.

10 **Q. And what do you say?**

11 A. "The Census team put together this
12 spreadsheet with four examples. Is this what you
13 had in mind?"

14 **Q. And then you have examples: Vaccines
15 aren't FDA approved. Fraudulent cures. VAERS data
16 taken out of context and infertility; right?**

17 A. Yes.

18 **Q. What did you mean by the subject word --
19 what was your understanding of the subject "request
20 for problem accounts"?**

21 A. I don't know --

22 **Q. Okay.**

23 A. -- why the subject read that. But what he
24 asked for in the email is for examples of
25 misinformation.

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1 **Q. Okay. And when you met with him, did you**
2 **have a spreadsheet like this?**

3 A. I don't -- we, we sent him a spreadsheet.
4 I don't remember meeting with Todd --

5 **Q. Okay.**

6 A. -- besides the BOLO meetings. We might
7 have, but I don't recall.

8 **Q. And if -- and if you look at this email --**

9 A. Mm-hmm (affirmative).

10 **Q. -- it has attachments?**

11 A. Yes.

12 **Q. And it's Twitter CDC examples. So you've**
13 **attached the spreadsheet to this?**

14 A. Right.

15 **Q. Okay.**

16 A. I thought you were asking about when we
17 met with him --

18 **Q. No --**

19 A. -- did we have spreadsheets.

20 **Q. -- that's -- I was asking that.**

21 A. Okay.

22 **Q. Do you know who in the Census put this**
23 **spreadsheet together?**

24 A. I don't know for sure, but likely it was
25 Christopher.

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1 **Q. Christopher, remind me.**

2 A. Lewitzke.

3 **Q. Lewitzke, yes. I got it.**

4 A. Something close to that name.

5 **Q. We discussed him earlier. He appears on**
6 **those emails?**

7 A. Yes.

8 **Q. Not a new guy?**

9 A. No. I feel like we're saying his name
10 wrong, though.

11 **Q. I think that's correct. Lewitzke.**

12 **(Comment off the record.)**

13 BY MR. VECCHIONE:

14 **Q. Do you know whether that Census team had**
15 **any medical professionals on it?**

16 A. No.

17 **Q. And what was the definition of fraudulent**
18 **cures?**

19 A. I don't remember what that was.

20 **Q. And what is the category: Vaccines aren't**
21 **FDA approved? Is that a claim, or is that a**
22 **statement about vaccines that you're making? What**
23 **is that?**

24 A. I'm interpreting this whole list as things
25 that they saw that were being stated as

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1 misinformation, that there were claims that vaccines
2 aren't FDA approved.

3 **Q. All right. And as far as VAERS data taken**
4 **out of context, is your understanding that that's**
5 **the same problem we discussed earlier with VAERS**
6 **reports?**

7 A. Yes.

8 **Q. All right. It's not something different?**

9 A. Yes.

10 **Q. Let me rephrase. No, it's not something**
11 **different?**

12 A. I believe this VAERS data taken out of
13 context is the same kind of thing we were discussing
14 earlier.

15 **Q. Thank you. And what do you believe**
16 **"infertility" is?**

17 A. I'm assuming this was people claiming that
18 getting the vaccines led to infertility.

19 **Q. Okay. And why did you give this chart and**
20 **this information to Mr. O'Boyle?**

21 A. He asked for examples. And I believe he
22 was asking for these examples in this email because
23 he was wondering what we would -- what would come up
24 in BOLO meetings, or what we would be discussing. I
25 think he wanted some sense of what we would be

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1 bringing to point out. That's my memory of it.

2 **Q. You can put that aside.**

3 MS. SNOW: Can we take like a five-minute
4 break?

5 MR. VECCHIONE: Sure, sure. We have --
6 we're -- I was cooking with gas, though, so, you
7 know --

8 (Comments off the record.)

9 THE VIDEOGRAPHER: Off the record at 3:37.

10 (Recess 3:37 p.m. - 3:51 p.m.)

11 THE VIDEOGRAPHER: Back on record at 3:51.

12 BY MR. VECCHIONE:

13 **Q. And I will again direct the witness to**
14 **read the subject line and the date, and then read**
15 **this one. And this one is a little more hefty. You**
16 **may want to take a look through it.**

17 MS. SNOW: What exhibit?

18 MR. VECCHIONE: Exhibit 34.

19 (Plaintiffs' Exhibit 34 marked.)

20 A. Subject line is COVID Misinformation.
21 Sent 6/30/2021.

22 MS. SNOW: Mine is stapled out of order, I
23 just realized. I want to make sure, it might just
24 be mine, if you want to clarify.

25 MR. VECCHIONE: Let's do the Bates stamps.

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1 The bottom right I have it ends 496, 497, 498, 499
2 and 500.

3 MS. SNOW: I think I have all those. They
4 are just out of order. I just want to make sure no
5 one else's was.

6 MR. VECCHIONE: No, I appreciate that.

7 MS. SNOW: Yeah.

8 MR. GILLIGAN: Is Carol's right?

9 MS. SNOW: Yeah.

10 A. Mine was correct.

11 BY MR. VECCHIONE:

12 **Q. Tell me when you're ready.**

13 A. I'm ready.

14 **Q. All right. Can you identify Exhibit 34**
15 **for me?**

16 A. The subject line is COVID misinformation.
17 6/30/2021.

18 **Q. Do you recognize this document?**

19 A. This, yes, feels familiar to me.

20 **Q. And what is it?**

21 A. It's a discussion about accessing
22 Twitter's partner support portal where you can flag
23 information to be reviewed by Twitter.

24 **Q. Let's take a look. As usual, these chains**
25 **start at the back.**

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1 A. Mm-hmm (affirmative).

2 **Q. I think the first one in this chain is**
3 **May 10, 2021 at 1:50 p.m. and is that from you to**
4 **Todd O'Boyle?**

5 A. Yes.

6 **Q. And I think that we've seen this list of**
7 **items before to other -- to other social media**
8 **outlets about --**

9 A. Yes.

10 **Q. And it's concerned -- it's mainly**
11 **concerned about shedding?**

12 A. And microchips.

13 **Q. And microchips. And you attach sort of a**
14 **chart. Could you tell us what that chart is?**

15 A. Just a table of example posts regarding
16 this, those two issues, vaccine shedding and
17 microchips. It's not really a chart. It's just
18 formatted in a table.

19 **Q. Okay. Could you read what you say to him**
20 **right above the table?**

21 A. (As read) We wanted to point out two
22 issues that we are seeing a great deal of misinfo
23 about, vaccine shedding and microchips. These
24 are -- the below are just some example posts. We do
25 plan to post something shortly to address vaccine

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1 shedding, and I can send that link too. Our Census
2 team copied here has much more info on it if needed.

3 **Q. Okay. And so you have copied the Census**
4 **team that we've discussed earlier.**

5 A. Yes.

6 **Q. And then you say -- could you read what**
7 **you say next?**

8 A. (As read) We're -- also we're standing up
9 a BOLO COVID misinformation meeting and inviting all
10 tech platforms. We are shooting for 12 p.m. on
11 Friday for our first meeting. I'll include you on
12 the invite but if you'd like to propose an alternate
13 approach or would like me to include others, just
14 let me know.

15 **Q. All right. Tell us. We discussed a**
16 **little bit the BOLO meetings that you had with the**
17 **tech companies. And this BOLO COVID meeting, is**
18 **this the first one? Where does it stand amongst**
19 **those you've discussed?**

20 A. I -- without having the date --

21 **Q. Right.**

22 A. -- in front of me, I think this is in
23 reference to the very first meeting.

24 **Q. Okay. And BOLO, we said, is be on the**
25 **lookout. And this was -- you were sending this to**

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1 **Mr. O'Boyle so that he would be on the lookout for**
2 **these things appearing on Twitter?**

3 A. Yes.

4 **Q. Did you have a prior conversation with him**
5 **about this before you sent it, do you know?**

6 A. I don't think I had a prior conversation
7 about vaccine shedding and microchips, and these are
8 examples of that. I mean, we saw on the other one
9 we had sort of general conversations about how we
10 could -- how we should have meetings or not have
11 meetings. And I probably asked about the BOLO, like
12 is the BOLO format, since it was used previously, a
13 good format.

14 **Q. Okay. And what is that format? So it's**
15 **just -- we've seen the previous one, you said to him**
16 **I'll include you on the invite, but if you'd like to**
17 **propose an alternative approach, or would like me to**
18 **include others, just let me know.**

19 **Did you have some view of whether Twitter**
20 **wanted to meet alone, or separately? Is that what**
21 **that means?**

22 A. No. But I had a view that I couldn't tell
23 if the platforms wanted to do the BOLO meetings the
24 way Census had done them for their own work, so I
25 was checking.

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1 **Q. Had you been at any -- invited to any of**
2 **the Census BOLOs?**

3 A. No. I don't think they were doing BOLOs
4 by the time that we were meeting.

5 **Q. So they had done that for the Census?**

6 A. That's my understanding.

7 **Q. And it had been in relation to the 2020**
8 **Census?**

9 A. That's my understanding.

10 **Q. All right. Did you talk to anyone at**
11 **Census about how they ran BOLO meetings?**

12 A. Yes.

13 **Q. Okay. In order to create your own?**

14 A. Yes.

15 **Q. And what did they tell you?**

16 A. Well, they explained how they did it. In
17 fact, they drafted the slide deck. We talked about
18 this earlier. They drafted it and showed me how
19 they thought that we should do it, and that it was
20 just we would give examples, we would give the
21 science, and then they -- people could follow up
22 separately. I mean, I believe we changed some of
23 the format of the PowerPoint, what we did for CDC of
24 course, but they -- you know, they kind of told us
25 how they had done it in the past.

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1 Q. Okay. Let's go to his response to you.

2 He says to you -- and here we see

3 Mr. Lewitzke's name spelled correctly; right?

4 A. Yes.

5 Q. Okay. So Todd O'Boyle writes to you on

6 May 10, 2021 on Exhibit 34. "Hi, Carol. Thanks for

7 sharing this."

8 And you took that to mean your chart,

9 right, or table, you called it?

10 A. Yes.

11 Q. "Agree these are important trends to note.

12 A quick scan shows that at least some of these have

13 been previously reviewed and actioned. I will now

14 ask the team to review the others."

15 What did you take that to mean?

16 A. I don't know how Todd meant it

17 specifically, but I interpreted it as Twitter made

18 decisions about the areas of misinformation based on

19 whatever policy they had.

20 Q. And he says: "Carol, remind me: Did you

21 have a chance to enroll in our partner support

22 portal? In the future that's the best way to get a

23 spreadsheet like this reviewed."

24 So you mentioned that Partner Support

25 Portal. What is that?

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1 A. My understanding of it, and I don't
2 believe I ever successfully got into it, but it's
3 similar to what I described for Meta. It's an
4 offering where you log in and you can report
5 misinformation or threats or problematic posted
6 content in this portal, and it puts it in a system
7 for review.

8 **Q. Did you know what happened at Twitter to**
9 **reports that were deemed actionable?**

10 A. I assume similar to Meta that they
11 probably had multiple options. I am sure some were
12 removed. I am sure some may have had -- were
13 flagged. I see flags all the time on the Twitter
14 posts. I am sure some were just maybe -- I don't
15 know what they do, but maybe they weren't
16 distributed as much on peoples' feeds.

17 **Q. Where do you see Twitter? Do you have a**
18 **Twitter?**

19 A. Yeah. I mean, my responsibility is social
20 media for CDC, so I do look at Twitter, and we have
21 Twitter accounts at CDC.

22 **Q. And CDC -- well, I'll just go back for one**
23 **second. You -- prior -- on May 10 you were**
24 **discussing a Friday meeting that you'd invited**
25 **Mr. O'Boyle to. And do you know whether that**

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1 **meeting occurred?**

2 A. I mean, I think we set up the first BOLO
3 meeting in May. And this was May 10th, and the
4 Friday was there so I suspect it did occur.

5 **Q. Okay. And you said you didn't use the**
6 **portal. Did anyone else at CDC use the portal?**

7 A. No, I don't -- I don't recall anyone else
8 trying to get access besides myself.

9 **Q. Had you talked to him about the partner**
10 **support portal beforehand, before this email chain?**

11 A. I don't remember. I'm inferring from this
12 chain that perhaps not.

13 **Q. All right. Had you talked to Census about**
14 **the portal?**

15 A. I don't recall if we discussed the Twitter
16 portal per se. But I did know from discussions with
17 them that one technique I think that they used was
18 using portals to -- for their work to report
19 information. I don't remember if we discussed
20 Twitter or not.

21 **Q. Okay.**

22 A. Or if it was all about Meta.

23 **Q. But it was your understanding that Census**
24 **did use such devices when offered?**

25 A. That, or they told me it was an option for

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1 us. I'm worried I'm mischaracterizing their work
2 with very little actual memory on it.

3 Q. Okay. And you respond to him: "Todd, I
4 don't think we have info on how to enroll, but we'd
5 be happy to get on it if you'd send some info";
6 right?

7 A. Yes.

8 Q. And he responds that -- on May 10th at
9 8:51, he says he's happy to enroll you, and it
10 allows you a special, expedited reporting flow in
11 the Twitter Help Center. That's the purpose of it.

12 A. Yes, I see that.

13 Q. What's the Twitter Help Center?

14 A. The portal is part of their help center
15 somehow. I mean, I'm not an expert, but I -- it's
16 seeming -- I think the screenshot might even show
17 how it's part of it.

18 No, it doesn't. But I believe it's like a
19 link on the help center page.

20 Q. And he says it worked very well with
21 Census colleagues last year; right?

22 A. Well, there we go.

23 Q. Yeah.

24 A. That's why he came up with that.

25 Q. Okay. And did you give him a Twitter

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1 **account to enroll?**

2 A. I asked him -- I can see that I asked him
3 does it have to be our official CDC account, or is
4 it supposed to be personal. And I gave him my
5 personal one.

6 **Q. Okay. And what was your problem with**
7 **using -- did you have a technical problem with using**
8 **it? What happened?**

9 A. It was not a priority for me, for one. I
10 wasn't thinking that we would probably want to use
11 this portal on a regular basis. I thought that let
12 me just myself, instead of asking my staff to get
13 involved, I want to see what the portal is myself
14 because I wasn't able to look at the Meta portal
15 myself because you had to be administrator.

16 So I wanted to look at it and see what it
17 it looked like, but I -- it wasn't a priority. So
18 every now and then I would try to get on it, and I
19 don't remember ever solving the problem. All I know
20 is I think when I clicked it nothing happened, or I
21 didn't get drop-downs. That's -- and I felt like
22 maybe I wasn't in the right place.

23 **Q. Okay.**

24 A. But I am --

25 **Q. Okay.**

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1 A. -- unclear of what exactly was wrong.

2 Sorry.

3 **Q. I got it. But here's -- so then I see**
4 **May 24th, 2021, 2:28 email from Christopher Lewitzke**
5 **that I think Todd forwards it to you. Is that how**
6 **that works? How does that page -- could you tell me**
7 **what's happening on this page?**

8 A. The way the reply works from the email
9 it's unclear if I was copied or not, so I can't say.
10 But I definitely was copied on Todd's response to
11 Christopher. I'm not sure if Christopher copied me
12 on his email to Todd, which is what I think you're
13 asking me.

14 **Q. Okay. But on May 24th at least it looks**
15 **like Lewitzke sent a note to Todd?**

16 A. Mm-hmm (affirmative). And then 30 minutes
17 later Todd hit reply with everyone on it.

18 **Q. Okay. And Carol says I had -- (as read)**
19 **Carol and I had a sidebar, and I requested her**
20 **account be enrolled. Your email reminds me that the**
21 **process should have been completed by now. I'll**
22 **check with the team to make sure it's properly**
23 **enrolled.**

24 **And that's your recollection that's how it**
25 **occurred?**

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1 A. That's my recollection. I don't recall
2 the sidebar, but I do know that I wanted it to be
3 CDC people in these portals versus Census. I felt
4 like that was more appropriate.

5 **Q. And remind me, who's Christopher Lewitzke?**

6 A. He's a -- he's a Census contractor.

7 **Q. Okay. With this Reingold outfit we talked**
8 **about?**

9 A. Mm-hmm.

10 **Q. He says: We want to have at least some**
11 **CDC accounts whitelisted. What does whitelisted**
12 **mean?**

13 A. Let me read this. I'm not sure.

14 **Q. You've never heard that term before?**

15 A. I have heard of whitelisted. I don't
16 understand it in this context.

17 **Q. What was your understanding of whitelisted**
18 **meaning?**

19 A. Like my under -- my general understanding
20 of whitelisting is you can have kind of a list of
21 things that maybe -- of servers that are allowed or
22 not allowed is an example of a list of whitelist.

23 **Q. Okay. And then do you know which Census**
24 **accounts had access to this portal?**

25 A. My memory was that none. And I think this

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1 email supports my memory, and that Todd responding
2 that I'm going to be the account that's enrolled.

3 **Q. Oh.**

4 A. For CDC.

5 **Q. For CDC.**

6 A. For CDC at least.

7 **Q. But do you know which Census accounts?**

8 A. Oh, no.

9 **Q. Okay.**

10 A. I wouldn't have any knowledge of what they
11 did.

12 **Q. Okay. And then let's read up to May 27th,**
13 **2021, 2:30. And you say haven't seen anything come**
14 **through. And then Todd says: You should now be**
15 **up -- should be fully -- and period. You should be**
16 **fully period, he says.**

17 **Then he says: "When you visit the Twitter**
18 **help center logged in with your account you should**
19 **see additional reporting options."**

20 **Do you know what he meant by that?**

21 A. Yes. This portal, like I think when
22 anyone goes to the health center -- help center, I
23 think there is, like, you can flag threats and
24 things, I believe. I think he was saying I would
25 have had something more. But I never could locate

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1 that.

2 **Q. Okay. And you tell him: "Hi, Todd. I**
3 **have been trying to enter info but I realize I have**
4 **been unclear on where to enter them. I went to**
5 **/forms and there is a drop down on things to submit,**
6 **but none of them seem relevant to misinformation.**
7 **Am I in the right place?"**

8 **So is that the problem you had?**

9 A. I -- based on this email I think it was
10 one of the problems. I don't -- I think at the
11 beginning I didn't get the links, I couldn't find it
12 on the help center. There's probably additional
13 chains, I suspect, regarding this.

14 **Q. Okay. But you don't recall what they**
15 **were?**

16 A. No.

17 MR. VECCHIONE: All right. Put that
18 aside.

19 (Plaintiffs' Exhibit 35 marked.)

20 BY MR. VECCHIONE:

21 **Q. 35. And once again for Exhibit 35 tell me**
22 **what the subject line is and what's the date at the**
23 **top.**

24 A. The subject line: BOLO CDC lab alert
25 misinformation. Sent September 2nd, 2021.

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1 **Q. And I think we've seen this alert before**
2 **for another social media recipient, am I correct**
3 **about that?**

4 A. You're correct.

5 **Q. All right. Is this anything different**
6 **than when you testified last time about this BOLO?**

7 A. The only difference is this email is going
8 to Twitter.

9 **Q. Okay. And what was your intent in telling**
10 **Twitter through O'Boyle to be on the lookout for**
11 **misinformation about PCR testing?**

12 A. I mean, I, again, I think CDC's role is to
13 provide the facts around issues. We saw this
14 confusion about this alert brewing and more posts
15 were going up with confusion, and we thought it
16 would be a good idea to provide the platforms with
17 the facts before it became something bigger.

18 **Q. And what did you believe he'd do with the**
19 **information?**

20 A. I believed that they would consider it in
21 their -- I knew their policy teams or their trust
22 teams or misinfo teams, whatever they -- whatever
23 they called their teams, would evaluate it.

24 **Q. And perhaps remove it?**

25 A. I knew that removal was one of the options

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1 that they had, yes.

2 MR. VECCHIONE: You can put that aside.

3 (Plaintiffs' Exhibit 36 marked.)

4 BY MR. VECCHIONE:

5 **Q. Exhibit 36. And once again, if you could,**
6 **for Exhibit 36 tell me the date and the subject**
7 **line, and then read it to yourself.**

8 A. Subject: Call or VC-Facebook weekly sync
9 with CDC (CDC to invite other agencies as needed.)
10 And this was sent on April 15, 2021.

11 **Q. And then please read it to yourself.**

12 A. Okay.

13 **Q. All right. Do you know who created the**
14 **meeting agenda there?**

15 A. I think Payton probably inserted these
16 agenda items because it was her appointment.

17 **Q. And what was on that agenda?**

18 A. New attendees intro, CDC needs/questions,
19 FB product updates/feedback requests. (COVID-HUB).
20 And then COVID-19 projects, and several are listed
21 CMU/FB data survey. Update -- data survey update.
22 Excuse me. Misinfo collab status. Others.

23 **Q. Let's go through this. What's COVID-HUB?**

24 A. I believe the COVID-HUB is what they
25 called when I mentioned you're on Facebook and you

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1 could search for COVID, they actually provided
2 in-app content on COVID that they pulled from WHO,
3 CDC and other sources and I believe they call that
4 internally the COVID-HUB.

5 **Q. All right. And I think we have some new**
6 **names here in the middle. Let's see if we see most**
7 **of them. Kang-Xing Jin. Do you know who that was?**

8 A. Looks like a Facebook employee, but I
9 don't recall.

10 **Q. And I think we've discussed Raena Saddler,**
11 **but I've forgotten. Do you recall?**

12 A. I mean, she's with Facebook, or he is with
13 Facebook, but I don't know who they are.

14 **Q. All right. And then she cc'd a number of**
15 **people. Do you recognize any of those names besides**
16 **Liz Lagone?**

17 A. Yes, Airton, the first name.

18 **Q. Yeah.**

19 A. He was definitely with Facebook, and he
20 seemed to be an expert on like Facebook ads how to
21 run Facebook ads.

22 Julia Eisman is someone we talked to
23 regularly. I think she's in, like, their public
24 relations type office. She occasionally would be on
25 the calls with Payton. Kate Thornton, I don't

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1 recall. Carrie Adams, I mentioned is the new point
2 of contact I have now. And Ursula Phoenix Weir was
3 -- is someone at CDC. I assume that for this
4 meeting she was probably deployed in a -- something
5 that was related to what I thought was going to be
6 discussed here.

7 **Q. And what was her title?**

8 A. Ursula's?

9 **Q. Yeah.**

10 A. I'm not sure. When people deploy into
11 something -- Ursula probably had several roles
12 during COVID, as many of us did. I just don't -- I
13 can't tell why I invited her to this meeting from
14 looking at this.

15 **Q. Where was she normally?**

16 A. I believe -- I believe. I believe she's
17 in the National Center for Birth Defects.

18 **Q. Now, the subject says "Call or VC," I**
19 **assume that's voice chat?**

20 A. Yes.

21 **Q. "Facebook weekly sync." That's**
22 **synchronization with CDC?**

23 A. That's how I interpret sync, yes.

24 **Q. CDC to invite other agendas as -- agencies**
25 **as-needed. Okay.**

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1 **What did you understand CDC needs**
2 **questions to be about in this agenda?**

3 A. I think that that was often just listed.
4 I mean, it would just be if we had a question that
5 we needed, we wanted to ask Facebook about, or if we
6 had something that we -- was upcoming that we wanted
7 their assistance with or something. I know, like,
8 for instance, Airton's on this because sometimes
9 we'd have technical questions about how to run an ad
10 or the live chat, that kind of -- that we talked
11 about earlier, how to make it work.

12 **Q. All right. And then the COVID-19**
13 **projects, she seems to have split them up. Were**
14 **they split up this way within CDC or within**
15 **Facebook, to your knowledge?**

16 A. No. I think it's just a list of things
17 that were just put together in one area. But I
18 don't recall.

19 **Q. What's your understanding of CMU/FB?**

20 A. I think this was -- oh, gosh. I think
21 this was about some surveying that Facebook was
22 doing regarding COVID maybe, and they wanted to just
23 let us know they were doing it. But I'm very fuzzy
24 on that, on the details of it.

25 **Q. All right. And is data and survey**

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1 **separate?**

2 A. I think that's all one update. CMU at
3 slash FB data survey update. That's how I believe
4 this to be.

5 **Q. All right. And misinformation. "Misinfo"**
6 **is misinformation?**

7 A. "Collab status" is one thing.

8 **Q. Oh, that's one thing?**

9 A. Yeah.

10 **Q. Okay. And "collab" is collaboration?**

11 A. Yes.

12 **Q. And then others, I take it, is everything**
13 **else?**

14 A. Yes.

15 **Q. So when this meeting took place do you**
16 **know if there is any notes or recordings of it?**

17 A. We didn't record them. I don't -- like
18 I've been saying, I rarely took notes. If something
19 was jotted down, it would have been in an email or a
20 Word doc.

21 **Q. Do you recall if all these agenda items**
22 **were discussed on this call?**

23 A. No.

24 **Q. What do you remember about that meeting?**

25 A. I don't remember the specific meeting at

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1 all.

2 MR. VECCHIONE: Okay. You can put that
3 aside.

4 (Plaintiffs' Exhibit 37 marked.)

5 BY MR. VECCHIONE:

6 **Q. 37. And once again for Plaintiffs'**
7 **Exhibit 37 please read the date and the subject line**
8 **of, and then read it to yourself, please.**

9 A. Subject line: CDC "guides," in quotes,
10 and this week's meeting. And that was sent on
11 4/29/2021.

12 Okay.

13 **Q. All right. And can you identify what this**
14 **is?**

15 A. This is an email chain about -- that's
16 called "CDC 'Guides' and this week's meeting."

17 **Q. Okay. And at this time -- I think we've**
18 **talked about biweekly meetings. At this time could**
19 **you have been having weekly meetings with Facebook?**

20 A. We might have. There definitely were
21 times that we were talking weekly.

22 **Q. All right. Let's do it -- let's go to the**
23 **back, the last page.**

24 She writes to you: "Hi, Carol, we want to
25 flag a couple of items for you this week," right?

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1 **And she says: "Instagram Guides Promotion**
2 **Opportunity. Our Instagram team is looking to run**
3 **promotion to amplify vaccine-related Instagram**
4 **Guides. We saw that CDC has a great one on its**
5 **feed." And then she provides a link; is that right?**
6 **Am I correct? Did I read that correctly?**

7 A. Yes.

8 **Q. What is an Instagram Guides? I --**

9 A. I honestly don't remember. I noticed I
10 added our social lead to pipe in more of the guides.
11 I think it might have been like a reel, like the
12 little video snippets you can see on Instagram. But
13 I honestly cannot remember what they were at the
14 time.

15 **Q. Okay.**

16 A. I don't know that Instagram guides still
17 exist.

18 **Q. Let's talk about it just for a moment,**
19 **though, because we talked about various types of**
20 **social media. Instagram is usually like a photo and**
21 **then some words under it?**

22 A. That is one type of Instagram post, and
23 then there is more like a video version of it.

24 **Q. Okay. And how long -- does the video run**
25 **a long time like YouTube, or is it short?**

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1 A. No, it's short.

2 Q. And then she says: "The team is planning
3 to launch an in-feed promotion of the Guides on
4 Monday."

5 What's an in-feed promotion?

6 A. If I'm not sure what they meant by in-feed
7 promotion. But what I'm -- as reading this at this
8 moment, I believe they were -- it would, you know,
9 it would get highlighted more often in a user's
10 feed. They would -- the content would be promoted
11 more to the users in their scrolling.

12 Q. Okay. And then it says that this launch
13 in-feed promotion would run for three weeks, and the
14 anticipated reach is 60 to 80 percent of the people
15 in the U.S. on Instagram.

16 So that's 60 to 80 percent of the people
17 that -- the United States people on that platform,
18 is that your understanding?

19 A. Yes.

20 Q. And then she says: (As read) "We wanted
21 to know if the Guide above is up-to-date, or if
22 you'd be willing to update it (if needed) and if it
23 is something" you can include in the -- "we can
24 include in the promotion. Happy to discuss further
25 if this is something you may be interested in, or if

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1 **you have any questions."**

2 **Did I read that correctly?**

3 A. Yes.

4 **Q. Who decides whether the guide is up to**
5 **date or not?**

6 A. That would be us because it's our post.

7 **Q. Okay.**

8 A. Like if the guide is like a story -- I
9 called it a reel earlier, but a story is better for
10 Instagram. It's something that CDC has posted, so
11 it's our content to update.

12 **Q. Got it.**

13 A. And I'll add, to clarify, I can see on the
14 url it says "/CDC gov." So it's definitely
15 something we have posted, and if I'm incorrect about
16 the format of it I still can tell it's something
17 we've posted.

18 **Q. Okay. Then also "FYI", which I think is**
19 **for your information, "we are hoping for an update**
20 **on our COVID-19 misinfo reporting, but that is not**
21 **ready for this week."**

22 **What did you -- did I read that correctly?**

23 A. You read it correctly.

24 **Q. And what did you take that to mean?**

25 A. I am not sure, but I'm -- it might have

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1 been about those CrowdTangle reports and sending
2 them to us.

3 **Q. Can you read your response at 2:32 on the**
4 **same day, the 28th?**

5 A. Read the whole response?

6 **Q. Yeah.**

7 A. Okay. (As read) plus Jay to weigh in on
8 that guide. I think he'll have the latest info. I
9 think it would be great to get that kind of
10 promotion on it. Thanks for offering. I still hope
11 to get you some health equity info, but agree we can
12 pull that meeting down tomorrow. Are you being
13 asked by the White House to do anything on
14 vaccine.gov or vaccinefinder? If so, can you share
15 any plans in a nutshell via email?

16 **Q. All right. So, first, what's health**
17 **equity info?**

18 A. I can't recall the context of why we were
19 discussing it, or what prompted me to write that.
20 But CDC had posted, I believe around this time,
21 information on health equity. I'm thinking that we
22 either -- they wanted it, or we wanted to mention it
23 to them, but I don't recall which.

24 **Q. And you asked about the White House. You**
25 **asked her whether the White House is asking her to**

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1 do anything on vaccine.gov or vaccinefinder. What's
2 "vaccinefinder"?

3 A. Vaccines.gov originally was called
4 vaccinefinder.gov. But we renamed it vaccine.gov or
5 vaccines.gov when the vac- -- COVID vaccines came
6 out. But a lot of us still think of it as the
7 "vaccinefinder site" because when you go to that
8 site, in effect, the main thing it does is you can
9 put in your ZIP code and find out where COVID
10 vaccines are offered. So it helps you find the
11 vaccine.

12 Q. Why did you suspect the White House was
13 asking her or Facebook to do something about that
14 site?

15 MS. SNOW: Objection, calls for
16 speculation.

17 BY MR. VECCHIONE:

18 Q. And you wrote down: "Are you being asked
19 by the White House?" You asked her that. Why did
20 you do that?

21 A. I --

22 MR. GILLIGAN: You asked her why she
23 suspected something.

24 BY MR. VECCHIONE:

25 Q. Why did you -- why did you ask whether the

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1 **White House had asked her to do anything?**

2 A. I don't remember specifically. But it was
3 not uncommon because there was multiple major
4 agencies such as the White House working on things.
5 And so Payton had meetings with lots of federal
6 agencies, and we were -- the vaccine.gov site was
7 something CDC, HHS and the White House were
8 collaboratively working on.

9 So it might have been me just trying to
10 understand if we were about to promote vaccines.gov
11 on -- maybe it was in the guides; maybe I was just
12 trying to see if she knew something related to what
13 we were doing. We did overlap from time to time and
14 ask Payton similar things.

15 **Q. So you knew that Facebook could also have**
16 **been being contacted by other agencies besides CDC?**

17 A. Yes. They -- she -- I'm fairly confident
18 that she was speaking to several federal agencies
19 during the COVID response.

20 **Q. Including HHS?**

21 A. I believe so, yes.

22 **Q. And including the White House?**

23 A. I think. I believe so, yes. I don't -- I
24 didn't ask her her meeting schedule, but she often
25 would be up to date.

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1 **Q. Did she ever mention to you who her**
2 **contact was at the White House?**

3 A. No.

4 **Q. Do you know that of your own knowledge**
5 **from some other source?**

6 A. No.

7 **Q. Were you ever on a call with any of the**
8 **agencies in the White House?**

9 A. Yes. Sometimes what I remember was that
10 when vaccines.gov was coming out, that was involving
11 multiple agencies including people at the White
12 House and the U.S. Design System team and HHS and
13 CDC, and I do believe there might have been some
14 joint calls to discuss some of the promotion of
15 vaccine.gov.

16 **Q. All right. And U.S. Design are the people**
17 **who design the websites for the government?**

18 A. Yes. I think in my mind when I say White
19 House, they are the people in the White House that
20 I'm talking about because that's my counterparts in
21 the White House are digital people. I should have
22 clarified. I should have clarified that earlier.

23 **Q. All right. And do you know of anyone, any**
24 **names?**

25 A. There was several of them that were

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1 involved with vaccines.gov.

2 **Q. Okay. Do you recall any names?**

3 A. I really don't.

4 **Q. All right. Did anyone from the White**
5 **House, any office in the White House, direct you to**
6 **engage with social media companies independent of**
7 **your supervisor at the CDC?**

8 A. No.

9 **Q. All right. Let's take a look at the next**
10 **one. Payton to you on April 29 at 6:23. Can you**
11 **read her response to you?**

12 A. (As read) Thank you, Carol. Regarding
13 vaccines.gov -- or vaccine.gov -- we haven't had any
14 specific requests from the White House on this.
15 We've been working at the state level on our vaccine
16 finders tools and promotions. I also want to
17 followup on our COVID-19 misinfo reporting. Our
18 team is looking to schedule a training with CDC and
19 Census colleagues who will be reporting content
20 through the tool. It will cover Community
21 Standards, COVID-19 misinformation and harm policies
22 and a walkthrough of the reporting tool.

23 **Q. Let's stop there.**

24 A. Okay.

25 **Q. Did that training occur with CDC?**

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1 A. To my recollection, that training never
2 occurred. But I might not have been a part of it,
3 and that's why I don't recall it.

4 **Q. Do you recall whether or not Census was**
5 **involved in such a training?**

6 A. No, because I'm not sure that we had the
7 training, so I don't know who would have attended
8 it.

9 **Q. Okay. And then could you continue reading**
10 **where you have the asterisks?**

11 A. "Could you share back some times that may
12 work to schedule? We'll probably need 1.5 hours to
13 cover. If needed, we can break the training up if a
14 longer block is hard to schedule."

15 **Q. All right. And then you'll respond that**
16 **you'll check with Census; right?**

17 A. Yes.

18 **Q. But do you know whether or not you checked**
19 **with Census?**

20 A. No.

21 **Q. Do you recall anything more than what**
22 **you've told me about this training?**

23 A. I recall that when this -- well, can I ask
24 my -- can I ask counsel a question first?

25 MR. GILLIGAN: Yes, you may.

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1 (Witness conferring with counsel.)

2 MR. VECCHIONE: Let the record reflect
3 that the witness has consulted with counsel.

4 BY MR. VECCHIONE:

5 **Q. Can you answer my question?**

6 A. Oh. Yes. When we went through discovery,
7 I was pulling documents for discovery, and I was
8 asked if we had used the portal by I believe the CDC
9 lawyer that I have been working with, and I could
10 not recall.

11 So I went through a lot of emails at that
12 time, and I concluded that my memory was correct
13 that we really did not use the portal more than the
14 one time that I mentioned earlier, and that's why I
15 don't believe the training occurred. I don't have
16 any memory of going through the training, or setting
17 up the training. But it's pos- -- I mean, I have a
18 lot of emails, but that was what I thought after I
19 did discovery.

20 BY MR. VECCHIONE:

21 **Q. Right. And that's what you think now**
22 **sitting here?**

23 A. Yes.

24 **Q. All right. Thank you. You can put that**
25 **aside.**

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1 A. Okay.

2 (Plaintiffs' Exhibit 38 marked.)

3 BY MR. VECCHIONE:

4 **Q. And, again, for Exhibit 38 just tell me**
5 **the date and the subject line, and then read it to**
6 **yourself.**

7 A. I'm sorry. The subject, Wyoming issue.
8 April 30th, 2021. Okay.

9 **Q. So let's start from the back again.**

10 **On April 23rd you write to Payton Iheme**
11 **again. Can you write what you say to her?**

12 A. (As read) The Wyoming Department of
13 Health mentioned to one of our groups that the
14 algorithms that Facebook and other social media are
15 apparently using to screen out postings by sources
16 of vaccine misinformation are also apparently
17 screening out valid public health messaging,
18 including Wyoming Health communications. They were
19 looking for advice about how to work with social
20 media networks to ensure that verifiable information
21 sources are not blocked. Do you have someone that
22 she could talk to -- sorry. Do you have someone
23 that could perhaps talk to the state about this?

24 **Q. And then before you get a response you say**
25 **on top: "Anything you all can do to help on this?"**

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1 I guess -- you say that five days later, is that why
2 you sent it again?

3 A. They hadn't responded.

4 Q. Okay. Who decided what a verifiable
5 information source was at this time?

6 A. I don't know.

7 Q. Now, on April 28th at 6:37 you get an
8 email back from Adrien Genelle, I think or Genelle
9 Adrien. Excuse me.

10 A. Yes.

11 Q. And she says that her colleague can solve
12 this problem?

13 MS. SNOW: Objection, mischaracterizes
14 document.

15 BY MR. VECCHIONE:

16 Q. Did she direct you to another person to
17 take care of the problem?

18 A. She looped in another colleague to provide
19 additional guidance, or to connect directly with the
20 state health department that asked.

21 Q. Okay. And then you say, you tell her that
22 you don't have an email chain to loop anyone in
23 because it was received via meeting. Do you know
24 what meeting it was received in?

25 A. Yes. Well, no, I don't know exactly which

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1 meeting it was in, but it was just relayed to me
2 during one of the COVID internal meetings that, hey,
3 we got a call from Wyoming, do we know anyone to
4 connect them with.

5 **Q. And you connected to Holly Scheer? Is**
6 **that what you're doing there?**

7 A. Yes.

8 **Q. And do you know anything more about Eva**
9 **Guidarini than what she states here about her? Did**
10 **you ever deal with her?**

11 A. No.

12 MR. VECCHIONE: You can put that aside.

13 Exhibit 39. I believe they are all
14 one-pagers, and they are all stapled together, so
15 give me one moment.

16 (Plaintiffs' Exhibit 39 marked.)

17 BY MR. VECCHIONE:

18 **Q. Once again, could you just read the -- 39,**
19 **could you read the subject line and the date?**

20 A. Join with new info E: Call or VC-Facebook
21 weekly sync with CDC (CDC to invite other agencies
22 as needed). May 6, 2021.

23 **Q. Okay. Tell me when you're ready.**

24 A. Oh, I'm ready. I'm sorry.

25 **Q. And I think we've seen this meeting**

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1 before, but I just want to make sure it's not a
2 separate one. Was -- this was just with Facebook;
3 right?

4 A. This was.

5 Q. Okay. And the -- and we've already
6 discussed the items that were -- that were on the
7 agenda; right?

8 A. We did. But I'm just now noticing that
9 the items in the agenda might be a cut-and-paste
10 from the same thing and maybe weren't updated
11 regularly.

12 Q. I see. That's my question. All right.
13 So do you have any memory of this particular
14 meeting?

15 A. I don't.

16 Q. And you don't recall what was said one way
17 or another?

18 A. Don't recall, excuse me?

19 Q. Okay.

20 A. I didn't catch -- I'm sorry. I didn't
21 catch what you asked me.

22 Q. Oh, oh. Do you recall anything that was
23 said at that meeting?

24 A. On May 6? No.

25 Q. And do you know if the format was in Zoom,

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1 **or what the format, or Microsoft Teams, or in**
2 **person, or?**

3 A. It was always on either teams or they had
4 BlueJeans that we used occasionally.

5 **Q. Okay. What's BlueJeans?**

6 A. It's something like a Teams or a Zoom.

7 **Q. Okay. And, once again, do you know if**
8 **there is any notes or record kept of the meeting?**

9 A. I did not take any notes at the meeting
10 that I recall. I mean, same answer I have been
11 giving. If there were any, it was minor and they
12 would have been in Word or email.

13 **Q. Okay.**

14 **MR. VECCHIONE: 40.**

15 MR. GILLIGAN: I remember when everybody
16 just used Skype when it was simpler times.

17 (Plaintiffs' Exhibit 40 marked.)

18 BY MR. VECCHIONE:

19 **Q. Exhibit 40. Once again the date and the**
20 **subject line, and then read it to yourself.**

21 A. Subject line: COVID BOLO meetings on
22 misinformation, sent on May 10, 2021.

23 Okay.

24 **Q. All right. Let's go back to the back page**
25 **of this that's Bates number 682.**

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1 A. Okay.

2 Q. Now, this is -- I think we've said this
3 date. It's May 10th of 2021?

4 A. Yes.

5 Q. And you send to Facebook the COVID BOLO
6 misinformation meeting request; right?

7 A. Yes.

8 Q. And could you please read that for me?

9 A. (As read) We would like to establish
10 COVID BOLO meetings on misinformation and invite all
11 platforms to join the meetings. We are aiming for
12 the first one on Friday at noon. I know you were
13 considering a possible process on your end, but we
14 wanted to start here just as an interim first step.
15 Are there direct POCs on your end I should include
16 on the invite? I'm happy to chat if better, thanks.

17 Q. All right. Now, so this is the first BOLO
18 meeting. Does that comport with your recollection?

19 A. This is a note that I'm about to send an
20 appointment for the first BOLO meeting and asking
21 them who to include.

22 Q. All right. And we've already said POCs --

23 A. Yes.

24 Q. -- are the point of contacts; right?

25 A. Mm-hmm (affirmative).

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1 **Q. And you said: "I know you are considering**
2 **possible process on your end."**

3 **What did you mean by that?**

4 A. As I mentioned, that I was engaging with
5 the platform saying what format would be best for us
6 to talk about this. And I think there were
7 references in the exhibit a couple of times where
8 they said they were thinking internally about what
9 would be best. So I think I was just referencing
10 that I knew that they were considering it as well.

11 **Q. Do you know what the topics -- did you**
12 **know what the topics for the BOLO were when you sent**
13 **this out?**

14 A. I don't know if I did or not.

15 **Q. All right. Let's go to the next page back**
16 **where we have -- I believe this is from Jan**
17 **Antonaros to you, but he includes your email to him;**
18 **right?**

19 A. This -- the bottom part --

20 **Q. Mm-hmm (affirmative).**

21 A. -- is where I sent a similar note to
22 Google, which is Jan.

23 **Q. Okay.**

24 A. And I was telling her that we would like
25 to invite the digital platforms to attend the BOLO.

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1 I think it was me sending the appointment or a
2 heads-up that it was coming. I can't -- it looks
3 like maybe I -- this is an actual appointment.

4 **Q. Okay.**

5 A. But I tried to send each of them a
6 personal note that we were doing it.

7 **Q. And in this one you actually spelled out**
8 **be on the lookout; right?**

9 A. I did.

10 **Q. And was that because you hadn't discussed**
11 **it with them before, or did you have some concern**
12 **they wouldn't know what it was?**

13 A. I don't know why I didn't do it that time.

14 **Q. All right. And there is Kevin Kane here**
15 **with the email address [REDACTED]@Google.com. Who is**
16 **that?**

17 A. I don't remember Kevin, but this indicates
18 that he was from YouTube.

19 **Q. Okay. And do you recall having**
20 **discussions with YouTube?**

21 A. YouTube would occasionally -- people from
22 YouTube would occasionally be on our regular
23 meetings, depending on what we talked about. And
24 because YouTube has the most content, like, hosting,
25 they -- they were at the -- they were a part of the

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1 BOLO meetings, I believe, that Kevin attended
2 probably, or someone from YouTube did.

3 **Q. And you responded: "Great. I was going**
4 **to ask about Kevin."**

5 A. Yeah. Maybe I remembered who Kevin was at
6 the time.

7 **Q. Okay. And then finally the front page.**

8 A. That's a repeat of -- oh, no, that's not.
9 I apologize. I'm looking at the wrong one.

10 **Q. And here you're sending this to the Google**
11 **folks?**

12 A. Yes.

13 **Q. Why don't you read it for the record?**

14 A. "We would like to establish COVID BOLO
15 meetings on misinformation and invite all platforms
16 to join the meetings. We were aiming for the first
17 one on Friday at noon. We heard through the
18 grapevine that Kevin Cain at YouTube would want to
19 join. Are there other POCs on your end I should
20 include on the invite?"

21 **Q. All right. You said YouTube. Who's**
22 **YouTube related to, is it Google or Facebook?**

23 A. YouTube is a Google property.

24 **Q. Okay.**

25 A. Or platform.

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1 **Q. And is it your recollection that you did**
2 **have a meeting on Friday?**

3 A. I think we did, but I don't have the exact
4 date. But I believe we had -- that's when we had
5 the first BOLO meeting.

6 **Q. All right. And do you have any list of**
7 **who actually showed up and was an attendee?**

8 A. No.

9 **Q. All right. And, once again, it would be**
10 **on your calendar as far as if it happened?**

11 A. Now, to clarify I don't remember keeping a
12 list of who attended. Maybe Census might have
13 because this is something they were arranging. But
14 I don't recall it being sent to me. It could have
15 been, but I don't believe so.

16 **Q. So they were helping you arrange this**
17 **because they'd done it before, this particular**
18 **meeting?**

19 A. Yes. I mean, I mentioned that they
20 drafted the slides.

21 **Q. Right.**

22 A. And, you know, Chris participated in the
23 meeting.

24 **Q. Okay. Chris. Remind me his last name?**

25 A. Lewinsky, Lewitzke.

CAROL CRAWFORD 11/15/2022**Page 248**

1 **You sent this particular one to Todd**
2 **O'Boyle at Twitter; right?**

3 A. The formatting of the email is odd. But I
4 don't believe I did that. I believe I had one
5 appointment and I blind copied everyone, so the
6 emails -- I think that's just because he replied, it
7 looks like it's just him.

8 **Q. Okay. But you think when you sent these**
9 **out you sent them out to all the social media places**
10 **at once?**

11 A. I do. And I think when we were looking at
12 the other exhibit I wondered the same thing, but I
13 think that was the situation.

14 **Q. All right. That explains it for me.**
15 **And did you -- do you know if this meeting**
16 **in June, I think it would be, ever took place?**

17 A. I don't believe it did. And this is a
18 morning question. I'm starting to think maybe
19 Juneteenth was a new holiday we weren't expecting
20 that conflicted with the third BOLO meeting and
21 maybe that is why we didn't end up having it and we
22 sent the materials out via email.

23 **Q. All right. And who tasked you with**
24 **sending out the BOLO messages? Why were you doing**
25 **it?**

CAROL CRAWFORD 11/15/2022

1 A. Because I was the main person that was the
2 CDC point of contact to talk to Facebook, Twitter
3 and the platforms since our job was to lead digital
4 media.

5 MR. VECCHIONE: Okay. You can put that
6 aside.

7 (Plaintiffs' Exhibit 42 marked.)

8 BY MR. VECCHIONE:

9 **Q. Exhibit 42.**

10 MR. VECCHIONE: And I feel that someone
11 has added 43 in here, so I do apologize. That's a
12 late addition.

13 MR. GILLIGAN: I thought it was Carnac
14 time.

15 MR. VECCHIONE: No.

16 BY MR. VECCHIONE:

17 **Q. So, once again, please just name the date**
18 **and the subject matter, and then take a look at it.**

19 A. Yeah. Subject: Booster shots, regarding
20 booster shots. It was sent on 10/28/2021.

21 Okay.

22 **Q. All right. Do you recognize this**
23 **document?**

24 A. Not specifically.

25 **Q. Can you describe what it is?**

CAROL CRAWFORD 11/15/2022

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1 A. It's a conversation about some booster
2 guidance updates that are occurring and some
3 requests from Google to review some of the changes
4 that they were considering on the search result
5 pages.

6 **Q. All right. And the date is -- I think it**
7 **starts, if you look at the last page, on**
8 **September 30th, 2021.**

9 A. Yes.

10 **Q. And that's from Stanley Onyimba to Fred**
11 **Smith.**

12 **Who is Fred Smith? He's new.**

13 A. He's a direct -- he reports to me. He was
14 the technical person I mentioned who usually
15 attended the Google meetings with me. I was out of
16 town this date, so I wasn't on the email.

17 **Q. All right. And he -- well, I think he**
18 **sends you the email?**

19 A. Yeah.

20 **Q. Just you're cc'd?**

21 A. Maybe. I don't believe I was in town,
22 though --

23 **Q. Okay.**

24 A. -- when this was occurring. I don't see
25 myself cc'd on Stanley's email to Fred.

CAROL CRAWFORD 11/15/2022

1 **Q. All right. Why is -- do you have any**
2 **knowledge why is Stanley Onyimba sending this to**
3 **Fred? What is the purpose of this?**

4 MS. SNOW: Objection. Calls for
5 speculation.

6 A. Are you going to re-ask the question?

7 BY MR. VECCHIONE:

8 **Q. No.**

9 A. I mean --

10 **Q. What's your understanding of why he's**
11 **sending this --**

12 A. Yes.

13 **Q. -- to CDC?**

14 A. Well, I don't -- because the screenshots
15 are not available that are attached or put in here,
16 I can't directly explain this, but sometimes on
17 those Google panels that I mentioned they would
18 highlight specific things like, they would -- they
19 would, you know, before the search results came up,
20 they would highlight a link. And I think that they
21 were considering -- considering taking some words
22 that they saw on vaccines.gov and add it to that
23 panel, and they wanted to be sure it was right and
24 they were asking us.

25 **Q. All right. And then Fred responds that it**

CAROL CRAWFORD 11/15/2022

1 looks okay to him, but he's not the -- he's not an
2 expert on this?

3 A. Correct.

4 Q. All right. And so -- and then Mr. Smith
5 writes -- now, after that -- after that, you know, I
6 don't know, I'm going to go check with some people,
7 Mr. Smith writes back: "Hi, Stanley, I heard back
8 from some folks. No heartburn over the messages
9 proposed. Cheers, Fred."

10 Do you see that?

11 A. Yes.

12 Q. Did I read that correctly?

13 A. Yes.

14 Q. Do you know who "some folks" are? Who did
15 he check with?

16 A. I don't know who he checked with.

17 Q. Okay. And then the next -- I'm having a
18 hard time -- I can read the message. Do you know
19 when that was sent, the next message up?

20 A. The one from Jan and Megan?

21 Q. Yeah.

22 A. It looks like October 28, 2021.

23 Q. So you go all the way up to the next -- on
24 page 1, and then you read down?

25 A. That's what it appears, mm-hmm.

CAROL CRAWFORD 11/15/2022

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1 **Q. All right. Why don't you take -- so can**
2 **you -- you came back, apparently, and emailed**
3 **Antonio [sic] -- Jan and Stanley and the folks at**
4 **Google on October 28th at 5:11; right?**

5 A. Yes.

6 **Q. Okay. And you said: "This looks good,**
7 **thanks for checking," in the middle there?**

8 A. Mm-hmm (affirmative).

9 **Q. The next part?**

10 A. (As read) Yes. We can discuss the
11 pediatric vaccines early next week but let me give
12 you some general info: ACIP is likely to vote on
13 this on November 2nd. CDC is likely to start
14 posting final information on November 3rd...if that
15 helps to know. There will be many updates so the
16 changes might span over a few days. We are also
17 looking ahead and misinformation and hope to have a
18 BOLO type meeting later that week with the platforms
19 that are interested.

20 **Q. And who's ACIP?**

21 A. The Advisory Council for Immunization
22 Practices, I believe, I think that's right.

23 **Q. And do you know whether you had a BOLO**
24 **meeting for this?**

25 A. I don't -- I don't believe that we ever

CAROL CRAWFORD 11/15/2022

1 had one.

2 Q. So the email states that --

3 You can put that aside.

4 (Plaintiffs' Exhibit 43 marked.)

5 BY MR. VECCHIONE:

6 Q. Let's go to -- yeah, let's go to the last,
7 43.

8 Once again for Exhibit 43 please state the
9 subject matter line, and then the -- and who it --
10 what the date of it is?

11 A. Subject: Claims review. 6/29/2022.

12 I have read it.

13 Q. Okay. So can you read the -- well, who is
14 Rachel Gruner?

15 A. She is my new point of contact at Google.
16 She replaced Jan Antonaros.

17 Q. And who's Lindsay Steele?

18 A. Lindsay Steele replaced Stanley.

19 Q. Onyimba?

20 A. "O".

21 Q. Okay. And they're both -- their emails
22 are here in the to line; right?

23 A. Yes.

24 Q. All right. And if you could read the
25 after Hi, Carol, Hi, Fred from Rachel, what does she

CAROL CRAWFORD 11/15/2022

1 **say here?**

2 A. "The YouTube policy team is requesting
3 evidence-based input on the claims below. In the
4 past, the CDC has reviewed COVID information claims
5 and commented true or false plus any additional
6 context needed."

7 **Q. And then what are the claims?**

8 A. (As read) Claim: High dosage of
9 progesterone is a safe method of reversing chemical
10 abortion, in parentheses, mifepristone and
11 misoprostol.

12 Sorry.

13 (As read) Claim: High doses of
14 progesterone is an effective method of reversing
15 chemical abortion, in parentheses, mifepristone and
16 misoprostol.

17 **Q. All right.**

18 A. "Please let me know if you have questions
19 or concerns."

20 **Q. And then what -- how do you respond?**

21 A. "I'll check on this, but I think I'll
22 probably end up needing to refer you to another
23 agency. I'll get back to you."

24 **Q. So this -- this -- is it your**
25 **understanding this didn't have anything to do with**

CAROL CRAWFORD 11/15/2022

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1 **COVID-19 or vaccines?**

2 A. It definitely didn't have anything to do
3 with COVID-19 or vaccines.

4 **Q. Do you know why it was sent to you?**

5 A. Well, as COVID's -- our focus is not
6 solely on COVID. We're focusing on other topics. I
7 think Rachel thought that we might be able to help
8 with this topic as well.

9 **Q. Okay. Do you know who you sent it, what**
10 **agency you sent it to, if any?**

11 A. I -- I didn't know. I called one of our
12 centers and asked if this was something that CDC
13 dealt with. I didn't think that we did, and they
14 confirmed that we do not. And I don't think they
15 had a suggestion on where to refer this to, but I
16 can't recall for sure.

17 MR. VECCHIONE: All right. I would like
18 to take a brief break and have the court reporter
19 put my last exhibit together and give you copies
20 and then --

21 MR. GILLIGAN: There is a 44, too?

22 MR. VECCHIONE: -- confer, confer with
23 counsel, and I think we'll be finishing up.

24 (Comments off the record.)

25 THE VIDEOGRAPHER: Off the record at 5:07.

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1 (Recess 5:07 p.m. - 5:19 p.m.)

2 THE VIDEOGRAPHER: Back on the record at
3 5:19.

4 (Plaintiffs' Exhibit 44 marked.)

5 BY MR. VECCHIONE:

6 Q. All right. Ms. Crawford, this is going to
7 be Exhibit 44. And it will have -- once again, read
8 the subject line and then tell me what the date was.

9 A. Subject: "Themes that have been removed
10 from misinform." I am sure that was typo.
11 3/10/2021.

12 Okay.

13 Q. All right. Let's go to the back end of
14 the exhibit. And the first email chain is from
15 March 10th, 2021 from you to Payton Iheme; is that
16 correct?

17 A. Yes.

18 Q. And it says: "Themes that have been
19 removed for misinfo." And I think we've established
20 that's misinformation; correct?

21 A. Yes.

22 Q. And you say to her: "We mentioned this on
23 a call last week and you said you'd be sending
24 something as other had asked -- is that available
25 yet by chance?"

CAROL CRAWFORD 11/15/2022

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1 **What were you telling her? What did you**
2 **mean?**

3 A. This is what I was referencing on a
4 previous exhibit that one of our teams that was
5 doing those vaccine confidence reports and those
6 research reports, they were wondering if we -- if
7 they had info on the -- on the types of posts that
8 were removed and the themes because they were
9 worried that we could only see the live posts and so
10 we wouldn't know if there was also confusion about
11 other areas that had been removed.

12 **Q. And she --**

13 A. I feel pretty confident that that is what
14 this is about.

15 **Q. And she responds to you. "Are you looking**
16 **for types of COVID-19 misinfo we remove"; right?**

17 A. Yes.

18 **Q. "I think it may be worth a separate**
19 **meeting to have some of our leads discuss the**
20 **approach/what they are seeing and doing. Would that**
21 **work?" That's what you said?**

22 A. Yes.

23 **Q. And what are her leads; what was your**
24 **understanding?**

25 A. Just like I would bring people that were

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1 in charge of different areas, sometimes she would
2 bring people that had more expertise. Payton and I
3 did not know everything in our respective
4 organizations, so I assume it was a lead for
5 something, someone in this area.

6 **Q. All right. And then you respond to her on**
7 **March 10th at 9:24; correct?**

8 A. Yes.

9 **Q. "Yes." And you say "you mentioned**
10 **that" -- is that White House?**

11 A. Yes.

12 **Q. "And HHS"?**

13 A. Yes.

14 **Q. "Had asked so you'd get it to us"; right?**

15 A. Yes.

16 **Q. "I think it is wanted as part of**
17 **analysis -- so are you thinking there is no**
18 **report/file to send?"**

19 **Is that your question to her?**

20 A. Yes.

21 **Q. All right. And what you say there is when**
22 **White House and HHS ask Facebook for this**
23 **information, they assumed that Facebook would**
24 **provide it to them; correct?**

25 MS. SNOW: Objection. Calls for

CAROL CRAWFORD 11/15/2022

1 speculation.

2 BY MR. VECCHIONE:

3 **Q. You can answer.**

4 A. Well, I think it was poorly worded by
5 myself and kind of typo maybe. But what this was
6 was I recall we asked on the meeting if they had
7 this data, like, because we wanted it. And I think
8 she said, Oh, we did something like this for the
9 White House or HHS.

10 This is my memory of it.

11 **Q. Okay. This is one of your weekly**
12 **meetings, or a BOLO?**

13 A. I think it was at a weekly meeting.

14 **Q. All right. And then the next thing she**
15 **says back to you is: (As read) It wasn't a report,**
16 **but rather a discussion. We were setting up a**
17 **meeting with White House and HHS to discuss more**
18 **likely later this week or early next week. Perhaps**
19 **the CDC rep could participate or HHS share out?**

20 Is that what she says?

21 A. Yes.

22 **Q. What does HHS share out mean? That they'd**
23 **give it to you?**

24 A. Yes. Oh.

25 MS. SNOW: You're good. You're good.

CAROL CRAWFORD 11/15/2022

1 BY MR. VECCHIONE:

2 Q. So let's clean up the record a little.

3 What is an HHS share out? Does that mean they give
4 you whatever they are provided?

5 A. Yes.

6 Q. All right. So it was your understanding
7 that Facebook was having the same kind of meetings
8 you were having with them with White House and HHS?

9 A. I don't know that in relation to this
10 email. I was assuming that. But I do think that
11 they did have meetings with the agencies.

12 Q. And could you read what you respond to her
13 on May 10th at 9:30 a.m.?

14 A. "Oh, I assumed it was a report. Who at
15 HHS is in the meeting?"

16 Q. And what did she respond to you at 9:32?

17 A. (As read) Josh Peck would be the HHS rep
18 once a meeting is confirmed based on that I see him
19 at a previous discussions or meetings with the White
20 House.

21 Q. Do you know who he is?

22 A. Yes.

23 Q. Who is he?

24 A. I don't know his specific title, but he, I
25 believe, during this time was running the HHS COVID

CAROL CRAWFORD 11/15/2022

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1 communication marketing campaign.

2 **Q. All right. And did you interface with him**
3 **in any of your work?**

4 A. Yes.

5 **Q. Would he be at these, any of your weekly**
6 **meetings?**

7 A. No.

8 **Q. All right. Would he be at your BOLO**
9 **meeting?**

10 A. No.

11 **Q. All right. Next at 9:36 she adds**
12 **something. What does she say?**

13 A. (As read) And of course we are using
14 CrowdTangle as well to visualize the current trends
15 as well. Lauren has been working on that and can
16 give a refresher if needed. I know she has been
17 sending reports as well.

18 **Q. And who's Lauren?**

19 A. Lauren is the one who's been -- sent those
20 biweekly CrowdTangle reports during this time frame.

21 **Q. Okay. And then you respond to her at**
22 **9:43:56 seconds. What do you say?**

23 A. (As read) They want to see what you guys
24 proactively have removed that might not be in those
25 reports. My guess is a short meeting with Lis

CAROL CRAWFORD 11/15/2022**Page 263**

1 Wilhelm on the vaccine confidence team is what is
2 needed if Facebook is willing to do it. Doesn't
3 seem to me like that would be -- like it should be
4 part of the White House HHS meeting.

5 **Q. Who's Lis Wilhelm?**

6 A. She is the group that was creating those
7 vaccine confidence reports that was wondering if
8 they had all the data reflected in them, and what
9 the people were worried about, or confused about.
10 And she was thinking that if the data -- if we knew
11 the kinds of things that were removed, it might give
12 a fuller picture for those reports.

13 **Q. Okay. And then you discuss a time for**
14 **another meeting, and I think it ends at -- this**
15 **chain ends at 3:10, 9:54 a.m.: Let's plan on next**
16 **Thursday then.**

17 **Do you know whether you ever had that**
18 **meeting?**

19 A. I think we did.

20 **Q. And do you know what was discussed there?**

21 A. I think that the vaccine confidence team
22 came, and I don't -- and we discussed what they
23 might have that would give them that fuller picture.

24 **Q. You can put that aside. I have got a few**
25 **followup questions.**

CAROL CRAWFORD 11/15/2022

1 A. Okay.

2 **Q. At any of your -- in flagging any material**
3 **for any of the social media issues, themes, facts,**
4 **whatever you flag, can you say whether or not you**
5 **flagged any information from the Great Barrington**
6 **Declaration?**

7 A. I don't know what that is.

8 **Q. Okay. How about Jay Bhattacharya?**
9 **Anything from him?**

10 A. I don't know who that is.

11 **Q. Marty Kuldorff. Anything from him?**

12 A. I don't know who that is.

13 **Q. Aaron Kheriaty. Anything from him?**

14 A. I don't know who that is.

15 **Q. Jim Hoft, or Gateway Pundit?**

16 A. I don't know who that is.

17 **Q. All right. And Jill Hines?**

18 A. I don't know who she is.

19 **Q. All right. And I think I have asked you**
20 **before, but bear with me. Have you flagged anything**
21 **from Governor Michael Parson?**

22 A. I -- well, I may or may not have known the
23 name of the governor. But I don't recall any
24 specific who posted anything we flagged. That might
25 be a better way to answer these questions.

CAROL CRAWFORD 11/15/2022

1 **Q. Okay. And that's --**

2 A. I don't remember anybody associated with
3 the example posts that we sent.

4 **Q. Okay. And that would include -- I'm doing**
5 **this for the record, you understand. I understand**
6 **your answer.**

7 A. Yes.

8 **Q. That would include Eric Schmitt, Jeff**
9 **Landry and John Bel Edwards?**

10 A. Yes.

11 **Q. Thank you. And now, finally, on the BOLO**
12 **meetings, who ran the BOLO meetings?**

13 A. I ran the BOLO meetings.

14 **Q. In what manner? How did you do it?**

15 A. I opened up the meeting, introduced
16 myself, gave context for why we were doing the BOLO
17 meeting in brief. And then I believe that
18 Christopher went through the slide decks, and I
19 occasionally piped in on them.

20 **Q. Lewitzke?**

21 A. Yes.

22 **Q. And so he -- these slide decks, would they**
23 **be like the table you showed me or that we looked at**
24 **with examples of the shedding and the microchips in**
25 **the bloodstream?**

CAROL CRAWFORD 11/15/2022

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1 A. They were similar to the table, but they
2 were more like this is a theme, and then there'd be
3 maybe a little info about what the theme was and
4 then maybe a couple of example posts. And then
5 there would be a slide maybe with CDC links or
6 information related to that theme.

7 **Q. All right.**

8 A. So it was more than just a table. It had
9 more context to it.

10 **Q. How long did the meetings go?**

11 A. They were short. I mean, maybe they were
12 20 minutes.

13 **Q. And what did you and Mr. -- well, first,
14 what did you hope to accomplish by those meetings?**

15 A. The same thing that I've been referencing.
16 I mean, our goal is to be sure that credible
17 information about COVID was out there. A lot of
18 people seek information on platforms. We thought
19 that by giving the platform scientific information
20 it might help in our goals to being sure that
21 credible information could be found.

22 **Q. And uncredible information would not be
23 found; correct?**

24 MS. SNOW: Objection, mischaracterizes
25 testimony.

CAROL CRAWFORD 11/15/2022

1 BY MR. VECCHIONE:

2 Q. You can answer.

3 A. I did want the credible information to be
4 found in advance of the uncredible information.

5 Q. You at least wanted upgraded over --

6 A. Yes.

7 Q. -- uncredible information?

8 A. Yes.

9 Q. Do you recall anything anyone at any of
10 the social media platforms asked at any of these
11 BOLO meetings?

12 A. They weren't able to ask questions during
13 the BOLO meetings.

14 Q. Why was that? Tell me how it ran.

15 A. I think we talked about that this morning.
16 They are muted because the thought was they're
17 competitors, and they could ask questions
18 individually later.

19 Q. Got it. One second.

20 (Mr. Vecchione conferring with Mr. Sauer.)

21 BY MR. VECCHIONE:

22 Q. Did they ask any questions individually
23 later that you recall?

24 A. No, I don't think that they did.

25 MR. VECCHIONE: All right. I have no

CAROL CRAWFORD 11/15/2022

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1 further questions at this time.

2 MS. SNOW: Okay. Nothing further. No
3 questions for defense.

4 MR. VECCHIONE: And you already said
5 you'll read, right, at the beginning?

6 MS. SNOW: I said that at the beginning,
7 so I didn't want to forget at the end.

8 MR. VECCHIONE: All right.

9 THE VIDEOGRAPHER: Okay. I've got to ask
10 on the record, what about video copies for
11 everybody? Anybody?

12 MR. SAUER: We want video as soon as it's
13 available.

14 THE VIDEOGRAPHER: So you want synced,
15 non-synced?

16 MR. SAUER: I think synced syncs the video
17 to the transcript?

18 THE VIDEOGRAPHER: Yes, I believe so.

19 MR. VECCHIONE: And we -- I think what
20 we've been doing, we're going to do is give the
21 originals to her to put the record together, the
22 transcript together, the original exhibits.

23 MR. GILLIGAN: The original exhibits, yes.

24 MR. SAUER: So there should be -- that
25 stack of exhibits should go to the court reporter in

CAROL CRAWFORD 11/15/2022

1 front of the witness.

2 THE VIDEOGRAPHER: Do you want a copy also

3 for your group?

4 MR. SAUER: No, just one. We're both

5 plaintiffs.

6 MR. VECCHIONE: And there is no Exhibit.

7 25 that's the one we skipped. So don't be thinking

8 it's lost.

9 MS. SNOW: But, yeah, we would like a copy

10 of the video as well.

11 THE VIDEOGRAPHER: Okay. A synced copy?

12 MS. SNOW: Yes.

13 THE VIDEOGRAPHER: So how about you, sir?

14 MR. GILLIGAN: She's with us.

15 THE VIDEOGRAPHER: So just one for each.

16 MS. SNOW: Yeah.

17 THE VIDEOGRAPHER: Got you. Thank you.

18 And we are off the record at 5:33.

19 (Concluded at 5:33 p.m.)

20 (Signature reserved.)

21

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CAROL CRAWFORD 11/15/2022

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C E R T I F I C A T E

STATE OF GEORGIA:

DEKALB COUNTY:

I, Maureen S. Kreimer, a Certified Court Reporter for the State of Georgia, before whom the foregoing deposition was taken, do hereby certify:

That CAROL CRAWFORD, the witness whose deposition is hereinbefore set forth in pages 1 to 269, was duly sworn by me and that such deposition is a true record of the testimony given by the witness.

I further certify that I am not related to any of the parties to this action by blood or marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS HEREOF, I have hereunto set my hand this 18th day of November, 2022.



MAUREEN S. KREIMER, CCR-B-1379
Notary Public in and for the
State of Georgia. My Commission
Expires August 14, 2024.

CAROL CRAWFORD 11/15/2022

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1 LEXITAS LEGAL
2
3 November 17, 2022
4
5 KYLA SNOW, ESQ.
6 U.S. Department of Justice
7 1100 L Street N.W.
8 Washington, DC 29530
9
10 IN RE: STATE OF MISSOURI ex rel. ERIC S. SCHMITT,
11 Attorney General, et al. v. JOSEPH R.
12 BIDEN, JR., in his official capacity as
13 President of the United States, et al.
14
15 Dear Ms. Snow:
16
17 Please find enclosed your copies of the deposition of
18 CAROL CRAWFORD taken on November 15, 2022 in the
19 above-referenced case. Also enclosed is the original
20 signature page and errata sheets.
21
22 Please have the witness read your copy of the
23 transcript, indicate any changes and/or corrections
24 desired on the errata sheets, and sign the signature
25 page before a notary public.
26
27 Please return the errata sheets and notarized
28 signature page within 30 days to our office at 711 N
29 11th Street, St. Louis, MO 63101 for filing.
30
31 Sincerely,
32
33
34 Lexitas Legal
35
36 Enclosures

CAROL CRAWFORD 11/15/2022

1 ERRATA SHEET

2 Witness Name: CAROL CRAWFORD

3 Case Name: STATE OF MISSOURI ex rel. ERIC S. SCHMITT,
 4 Attorney General, et al. v. JOSEPH R.
 5 BIDEN, JR., in his official capacity as
 6 President of the United States, et al.

7 Date Taken: NOVEMBER 15, 2022

8

9 Page # _____ Line # _____

10 Should read: _____

11 Reason for change: _____

12

13 Page # _____ Line # _____

14 Should read: _____

15 Reason for change: _____

16

17 Page # _____ Line # _____

18 Should read: _____

19 Reason for change: _____

20

21 Page # _____ Line # _____

22 Should read: _____

23 Reason for change: _____

24

25 Witness Signature: _____

CAROL CRAWFORD 11/15/2022

1 STATE OF _____)

2

3 COUNTY OF _____)

4

5 I, CAROL CRAWFORD, do hereby certify:

6 That I have read the foregoing deposition;

7 That I have made such changes in form

8 and/or substance to the within deposition as might

9 be necessary to render the same true and correct;

10 That having made such changes thereon, I

11 hereby subscribe my name to the deposition.

12 I declare under penalty of perjury that the

13 foregoing is true and correct.

14 Executed this ____ day of _____,

15 20____, at _____.

16

17

18

19

CAROL CRAWFORD

21

22

NOTARY PUBLIC

24 My Commission Expires:

25

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CAROL CRAWFORD 11/15/2022

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Exhibit

15

CONFIDENTIAL

From: [REDACTED]@fb.com]
Sent: 3/16/2021 11:17:59 PM
To: Slavitt, Andrew M. EOP/WHO [REDACTED]
CC: Flaherty, Rob EOP/WHO [REDACTED]
Subject: Re: [EXTERNAL] Re: You are hiding the ball

Thanks Andy, and apologies for the delay in getting back. We are absolutely invested in getting you the specific information needed to successfully manage the vaccine roll out. We want to share information with you that we trust is statistically significant and derived from sound analysis, so that it can actually be helpful. The information cited in the WaPo article over the weekend was leaked and was not vetted internally to understand how accurate it is or the ramifications that could result from it. But I understand your point regarding how we communicate, and that we need to share information with you in a way that prioritizes what we are seeing in as close to real time as possible. I'd like to set up a conversation with our research leads to walk your team through ongoing research we are currently conducting and our approach; and then we can prioritize sharing results as quickly as possible.

Moreover, the data we sent on Friday and will continue to send throughout the year represents the information we are using internally to shape our own thinking on this content — we believe this data addresses many of the questions that have been posed (because it has been so helpful to guide our own internal efforts). We'd appreciate the opportunity to go through it in detail with whomever is interested on your team.

I know you're extremely busy. If it's ever helpful to connect by phone instead of over email I am at [REDACTED]

[REDACTED]

From: Slavitt, Andrew M. EOP/WHO <[REDACTED]>
Date: Monday, March 15, 2021 at 7:11 PM
To: [REDACTED]@fb.com>
Cc: Flaherty, Rob EOP/WHO <[REDACTED]>
Subject: Re: [EXTERNAL] Re: You are hiding the ball

[REDACTED]

I appreciate being copied on the note. It would nice to establish trust. I do feel like relative to others, interactions with Facebook are not straightforward and the problems are worse — like you are trying to meet a minimum hurdle instead of trying to solve the problem and we have to ask you precise questions and even then we get highly scrubbed party line answers. We have urgency and don't sense it from you all. 100% of the questions I asked have never been answered and weeks have gone by.

Internally we have been considering our options on what to do about it.

Regards,

Andy

Sent from my iPhone

On Mar 15, 2021, at 6:42 PM, [REDACTED]@fb.com> wrote:

Thanks, Rob. Called and left you a message earlier. I understand why you'd read the WaPo piece and come away feeling like we are not leveling with you. The piece inflated unconfirmed and leaked work that's being done by a small team. It's exploratory work and is not close to being a finalized work product - in fact the team that briefed you (including me) wasn't aware of the work at the time we briefed you. This was not a "massive study" as depicted by the Post - this was a small team experimenting with applying a relatively new system to COVID19 content. At any given time, there are many research projects similar to this being conducted by data scientists across the platform --as we've discussed, we're working hard to understand and address this type of content. Our definition of vaccine hesitancy is evolving - it is not a mature concept. This is early work and we have not gone through the kind of quality assurance we'd usually do before sharing the learnings externally. The data that leaked and was reported on should not be interpreted to be anything more than one of many efforts underway to better inform how we tackle this problem. As we develop them further, we will definitely keep you updated.

We obviously have work to do to gain your trust. You mention that you are not trying to play "gotcha" with us—I appreciate the approach you are taking to continued discussions. We are also working to get you useful information that's on the level. That's my job and I take it seriously—I'll continue to do it to the best of my ability, and I'll expect you to hold me accountable.

If interested, I can schedule time to give you more context on how this work is done and why we wouldn't include it in a briefing.

From: Flaherty, Rob EOP/WHO <[REDACTED]>
Date: Monday, March 15, 2021 at 1:10 PM
To: [REDACTED]@fb.com>
Cc: Slavitt, Andrew M. EOP/WHO <[REDACTED]>
Subject: RE: You are hiding the ball

I don't think this is a misunderstanding, [REDACTED]. I've been asking you guys pretty directly, over a series of conversations, for a clear accounting of the biggest issues you are seeing on your platform when it comes to vaccine hesitancy, and the degree to which borderline content—as you define it—is playing a role. I've also been asking for what actions you have been taking to mitigate it as part of your "lockdown"—which in our first conversation, was said to be in response to concerns over borderline content, in our 1:1 convo you said was not out of any kind of concern over borderline content, and in our third conversation never even came up.

You said you would commit to us that you'd level with us. I am seeing in the press that you have data on the impact of borderline content, and its overlap with various communities. I have asked for this point blank, and got, instead, an overview of how the algorithm works, with a pivot to a conversation about profile frames, and a 45-minute meeting that seemed to provide you with more insights than it provided us.

I am not trying to play "gotcha" with you. We are gravely concerned that your service is one of the top drivers of vaccine hesitancy—period. I will also be the first to acknowledge that borderline content offers no easy solutions. But we want to know that you're trying, we want to know how we can help, and we want to know that you're not playing a shell game with us when we ask you what is going on.

This would all be a lot easier if you would just be straight with us.

From: [REDACTED]@fb.com>
Sent: Monday, March 15, 2021 10:22 AM
To: Flaherty, Rob EOP/WHO <[REDACTED]>
Cc: Slavitt, Andrew M. EOP/WHO <[REDACTED]>
Subject: [EXTERNAL] Re: You are hiding the ball

Thanks Rob—I think there is a misunderstanding on what this story is covering with respect to research that’s happening—I will call to clear up. Certainly not hiding the ball.

Also flagging our announcement that went live this morning—this is the announcement I mentioned on Friday’s call.

>>><https://about.fb.com/news/2021/03/mark-zuckerberg-announces-facebooks-plans-to-help-get-people-vaccinated-against-covid-19/><<<<;;

From: Flaherty, Rob EOP/WHO <[REDACTED]>
Date: Sunday, March 14, 2021 at 11:13 PM
To: [REDACTED]@fb.com>
Cc: Stavitt, Andrew M. EOP/WHO <[REDACTED]>
Subject: You are hiding the ball [REDACTED]

>>><https://www.washingtonpost.com/technology/2021/03/14/facebook-vaccine-hesistancy-qanon/><<<<;;

Sent from my iPhone

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11 **IN THE UNITED STATES DISTRICT COURT**
 12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 13 **SAN FRANCISCO DIVISION**

14 JUSTIN HART,
 15 Plaintiff,

16 v.

17 FACEBOOK, INC., *et al.*,
 18 Defendants.
 19

No. 3:22-cv-00737-CRB

**ANSWER TO FREEDOM OF
 INFORMATION ACT CLAIM**

ANSWER

1
2 Defendants the U.S. Department of Health and Human Services and the Office of Management
3 and Budget (collectively, “Defendants”) hereby answer the numbered paragraphs of Plaintiff Justin
4 Hart’s Complaint (ECF No. 1) concerning his Freedom of Information Act (“FOIA”) claim in the
5 above-captioned matter.

6 Introduction, Parties, and Jurisdiction and Venue

7 1-5. These paragraphs relate to claims that have been dismissed and thus no response is
8 required

9 6. Defendants deny that they have refused to produce responsive records to Plaintiff in response
10 to the FOIA requests he submitted on July 22, 2021, and separately aver that, after the Complaint was
11 filed, they made productions in response to those requests. The remainder of this paragraph consists
12 of a request for relief, to which no response is required.

13 7-10. These paragraphs relate to claims that have been dismissed and thus no response is
14 required.

15 11. This paragraph characterizes Plaintiff’s motivation for filing this lawsuit, to which no
16 response is required.

17 12. Defendants lack sufficient knowledge or information to form a belief about the truth of the
18 allegations in this paragraph.

19 13-16. These paragraphs relate to claims that have been dismissed and thus no response is
20 required

21 17. Defendant HHS admits the allegations in this paragraph.

22 18. Defendant OMB admits that it is an office within the Executive Office of the President, but
23 denies the remaining allegations in this paragraph.

24 19. This paragraph consists of a legal conclusion to which no response is required.

25 20-21. These paragraphs relate to claims that have been dismissed and thus no response is
26 required

27 22. This paragraph consists of a legal conclusion to which no response is required.

28 23. This paragraph relates to a claim that has been dismissed and thus no response is required.

1 24. This paragraph consists of a legal conclusion to which no response is required.

2 25. This paragraph relates to a claim that has been dismissed and thus no response is required.

3 26. Defendants lack sufficient knowledge or information to form a belief about the truth of the
4 allegation concerning where Plaintiff resides. The remainder of this paragraph consists of legal
5 conclusions to which no response is required.

6 **Facts**

7 1-65. These paragraphs relate to claims that have been dismissed and thus no response is
8 required.

9 66. Defendants restate and incorporate by reference the responses contained in all preceding
10 paragraphs.

11 67. Admitted.

12 68. This paragraph consists of conclusions of law, not allegations of fact, and thus no response
13 is required. To the extent a response is deemed necessary, Defendants deny any characterization of the
14 cited statutory provision, which speaks for itself, and respectfully refer the Court to that statute for a
15 full and accurate statement of its contents.

16 69. Defendants admit that the Complaint was filed on August 31, 2021, twenty-eight (28)
17 business days after Plaintiff's FOIA requests dated July 22, 2021. Defendants deny that they have not
18 produced responsive records, and separately aver that, after the Complaint was filed, they made
19 productions in response to the July 22, 2021 FOIA requests.

20 70. Denied.

21 71. This paragraph consists of conclusions of law, not allegations of fact, and thus no response
22 is required. To the extent a response is deemed necessary, Defendants deny any characterization of the
23 quoted statutory provision, which speaks for itself, and respectfully refer the Court to that statute for
24 a full and accurate statement of its contents.

25 72. This paragraph consists of a legal conclusion, to which no response is required.

26 73. This paragraph consists of a legal conclusion, to which no response is required. To the
27 extent a response is deemed necessary, denied.

28 74. This paragraph consists of a legal conclusion, to which no response is required. To the

1 extent a response is deemed necessary, denied.

2 75-110. These paragraphs relate to claims that have been dismissed and thus no response is
3 required

4 The remainder of the Complaint consists of Plaintiff’s prayer for relief, to which no response
5 is required. To the extent a response is deemed necessary, Defendants deny any allegations contained
6 in the prayer for relief and further deny that Plaintiff is entitled to the requested relief or to any relief
7 whatsoever.

8 Defendants hereby deny all allegations of the Complaint concerning the FOIA claim that are
9 not expressly admitted or denied above.

10 **DEFENSES**

11 **FIRST DEFENSE**

12 Plaintiff is not entitled to compel production of information that is not subject to or that is
13 exempt from disclosure under the FOIA.
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Dated: August 9, 2022

Respectfully submitted,

BRIAN NETTER
Deputy Assistant Attorney General

STEPHANIE HINDS
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Assistant Director, Federal Programs Branch

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