



September 17, 2020

Mark Zuckerberg  
Facebook  
1601 Willow Road  
Menlo Park, CA 94025

**RE: Shareholder Proposal Follow-up**

Dear Mark Zuckerberg,

In response to your announcement to pull political advertisement from the platform the week before the US presidential election and as shareholders, including filers of the resolution related to political advertisement, we would like to commend your attention to the severity of the problems raised by the company waiving political ads and politicians posts from content moderation guidelines as obvious risks to public health, safety, law and order, and democracy. However, these issues are as important in the US as elsewhere, as a platform with 2.7 billion users from all over the world. This one-week exception, in the US only, is certainly not sufficient to address the myriad issues we raised in our resolution. As we echoed the concerns of your employees in their letter to management on this decision, their ask was a moratorium on political advertising for an entire year before the election. In fact, we believe this partial and inadequate response to a much larger set of issues at the company may have unintended consequences paired with the company's inability or unwillingness to effectively moderate all other content for disinformation, hateful content and fake accounts which maximize Facebook's content and group promotion algorithms, and can continue to be used by foreign and domestic actors seeking to influence elections all over the world.

First, problems with Facebook's moderation have been made very clear in publicly damaging ways, in the last month, escalating in the last few days. On Monday, BuzzFeed broke the story of a former Facebook data scientist whistleblower whose 6,600 word internal memo detailed the ways in which management and leadership were aware of the scale and scope of massive disinformation campaigns happening all

over the world on the platform and remained cavalier in their treatment of these issues, particularly in developing and non-western contexts, while systemically under-resourcing content management activities<sup>1</sup>. On Wednesday, Sasha Baron Cohen, Kim Kardashian, Leonardo DiCaprio, Jennifer Lawrence, Orlando Bloom, Kerry Washington and other celebrities suspended their Instagram and Facebook accounts and called for their followers to do the same in protest and solidarity with the #StoptheHate campaign<sup>2</sup>.

These actions come on the heels of news that a Facebook group was linked to the hateful killing of two people and wounding of third in Kenosha, Wisconsin. This militia Facebook group incited and organized this violence on the platform, a fact that was reported by hundreds of users before any violence occurred, but which was ignored by Facebook until after the killings and even greater public outcry. Time Magazine reported:

On Tuesday morning, a page run by a group called “Kenosha Guard” asked if any followers would be willing to “take up arms” and “defend” the city against “evil thugs,” . . . The group also posted a since-deleted event titled “Armed Citizens to Protect Our Lives and Property,” . . . BuzzFeed News [reports](#) that the event was flagged to Facebook at least 455 times after it was posted.<sup>3</sup>

This is one of many demonstrations of the company’s inability and/or unwillingness to address the underlying gaps in administration and content moderation in practice, from its lax policy on user identification, to its promotion of Facebook groups and content, including those of third party news sources, that are controversial and sensational, propagating the most base, violent and slanderous conspiracy theories, which, paired with inability to identify users, have been part of concerted disinformation campaigns by governments and political entities.

Facebook has also recently been under scrutiny for promotion of another set of violent extremist groups, identified by the FBI as a domestic terrorism threat, QAnon, a group creating and circulating the conspiracy that US President Donald Trump is waging a secret war against a "deep state" network of pedophiles who are powerful government, business and media figures.

While Facebook has taken down many of these groups and accounts, the irony, raised in another well-supported shareholder resolution this year:

---

<sup>1</sup> <https://www.buzzfeednews.com/article/craigsilverman/facebook-ignore-political-manipulation-whistleblower-memo>

<sup>2</sup> <https://www.marketwatch.com/story/sacha-baron-cohen-kim-kardashian-west-and-other-celebrities-have-declared-open-season-on-facebook-2020-09-15>

<sup>3</sup> <https://time.com/5884804/mark-zuckerberg-facebook-kenosha-shooting-jacob-blake/>

Facebook is the world's #1 hub of reported child sexual abuse material (CSAM). . . . In 2019, there were more than 16.9 million reports of child sexual abuse material online and, of that, 15.8 million – or 94 percent – came from the Facebook platform. . . . Reported incidents of child sexual exploitation and grooming . . . increased dramatically from year to year over the past decade. The bottom line is that Facebook's efforts are not stopping these crimes against children -- including infants and toddlers -- on its platforms.<sup>4</sup>

Paired with rampant and dangerous disinformation about voting laws, about the safety and security of the US Postal Service in delivering ballots, about protests and unrest in US cities, of at least one deep fake generated of a Presidential candidate, this latest action by Facebook means, unfortunately, in the final week before the election, during the debates, that political ads cannot even clarify disinformation, and the zone will only be flooded with disinformation.

As shareholders, we do not advise the company on ordinary business matters, we can only raise public policy concerns and identify risks to the company urging the Board's greater attention. We agree with you that regulators must set the terms for social media companies and agree with many in law enforcement that compliance to existing law is primary and subordination to the letter and spirit of emerging international law in Europe is the only course of action acceptable to avoid losing our company's license to operate.

Until then, as relates to matters of public health and safety, rule of law and democracy, our company's inability to properly moderate the platform including political ads and politicians' posts, pose regulatory, litigation and reputation risks to the company, posing unmanageable and egregious public nuisance.

We urge you throw the full weight of your creativity and resources to work in partnerships with law enforcement, legislators and civil society to address these issues exploring solutions through trial and error including but not limited to the following:

- Creating a robust trackable authenticating system to register and identify users, to cross reference user lists with registered sex offenders, while supporting the reintroduction of the International Megan's Law and extending this protocol to online spaces<sup>5</sup>;
- Increasing the moderation of closed and secret groups on Facebook, in addition to requiring complete identification for anyone who starts a group;

---

<sup>4</sup> <https://proxyimpact.com/052020Release.html>

<sup>5</sup> [https://www.usmarshals.gov/megans-law-faqs.html#:~:text=What%20is%20the%20International%20Megan's,Megan's%20Law%E2%80%9D%20\(IML\)](https://www.usmarshals.gov/megans-law-faqs.html#:~:text=What%20is%20the%20International%20Megan's,Megan's%20Law%E2%80%9D%20(IML))

- Agreeing to an independent audit of content moderation policies and practices, as well as the firm’s rate of enforcement of content that violates community standards;
- Agreeing to create typologies of traffickers, spreaders of misinformation and other toxic content, and to develop independently audited protocols for monitoring users with similar data usage patterns;
- Block search results for all groups and pages with the terms “for sale” “buy and sell” connected to restricted categories;
- Banning minors under age 16 from Facebook;
- Restrict encryption to users above the age of 21;
- Migrating monitoring and enforcement of community standards in-house, while exponentially increasing the budget to this division;
- Reforming algorithms that promote content and groups trafficking illegal, violent, hateful, inflammatory or pernicious content or activities;
- Working with cloud services companies such as Cloudflare and law enforcement to monitor and quarantine high traffic content;
- Transitioning revenue generation to a user-pays model or other models to prepare for global data standard harmonization along the lines of the General Data Protection Regulation framework and to disincentivize the company’s hosting and promotion of illegal and pernicious material and activities as, currently, the company is incentivized to allow these activities and content given, fake accounts, more time on the platform and more views generate more revenue for the company; and
- Actively integrating recommendations from civil society, policy makers and law enforcement including: UNICEF<sup>6</sup> Change the Terms<sup>7</sup>, Color of Change<sup>8</sup>, and ACCO (The Alliance to Counter Crime Online)<sup>9</sup>, WeProtect Global Alliance, ECPAT<sup>10</sup>, and others.
- Banning all minors from Facebook until these measures are taken.

These steps should all take place, before implementation of end-to-end encryption as other shareholders have advocated<sup>11</sup>, which would likely mean postponing end-to-end encryption.

---

<sup>6</sup> <https://www.unicef-irc.org/research/disrupting-harm/>

<sup>7</sup> <https://www.changetheterms.org/terms>

<sup>8</sup> <https://colorofchange.org/stop-hate-for-profit/>

<sup>9</sup> <https://www.counteringcrime.org>

<sup>10</sup> [https://www.ecpat.org/wp-content/uploads/2016/04/EXSUM\\_A4A\\_AM\\_USA.pdf](https://www.ecpat.org/wp-content/uploads/2016/04/EXSUM_A4A_AM_USA.pdf)

<sup>11</sup> <https://proxyimpact.com/052720Release.html#:~:text=By%20moving%20to%20end%2Dto,currently%20being%20detected%20and%20reported.>

As shareholders, we would be encouraged if you and your staff are interested in discussing these issues and concerns with us.

Sincerely,

**Harrington Investments, Inc.**



**Change Finance**



**Skye Advisors, LLC**



**Fresh Pond Capital a division of Reynders,  
McVeigh Capital Management, LLC**



**Seventh Generation Interfaith**



**Arjuna Capital**



**Natural Investments, LLC**



**Transformative Wealth Management, LLC**



CC: Corporate Secretary