



HOUSE COMMITTEE ON  
**SMALL BUSINESS**  
CHAIRMAN ROGER WILLIAMS

EST. 1941

# **SMALL BUSINESS: INSTRUMENTS AND CASUALTIES OF THE CENSORSHIP-INDUSTRIAL COMPLEX**

**The House Committee on Small Business  
Interim Staff Report 2024**

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# I. Executive Summary

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The House Committee on Small Business (Committee or HCSB) is charged with investigating all “problems of all types of small business” under House Rule X. As part of this responsibility, the Committee is investigating the Federal funding and promotion of small entities who purposely interfere with the ability of small domestic businesses to compete online because of their lawful speech, as well as tech start-ups and other small businesses with products used to surveil and ultimately suppress lawful speech. Over the course of the Committee’s 14-month investigation, the Committee found:

- Finding 1:** The Federal government has fueled a censorship ecosystem impacting not only individuals’ First Amendment rights, but the ability of certain small businesses to compete online.
- Finding 2:** The Federal government has funded, developed, and promoted entities that aim to demonetize news and information outlets because of their lawful speech, impacting domestic businesses’ operations, reputation, customer reach, and revenue.
- Finding 3:** The Global Engagement Center (GEC), an interagency body housed within the U.S. Department of State (State), circumvented its strict international mandate by funding, developing, then promoting tech start-ups and other small businesses in the disinformation detection space to private sector entities with domestic censorship capabilities.
- Finding 4:** The National Endowment for Democracy (NED), a private non-profit funded almost entirely by Congressional appropriations, violated its international restrictions by collaborating with fact-checking entities in assessing domestic press businesses’ admission to a credibility organization.

Throughout this investigation, the Committee obtained nonpublic GEC and NED award information for direct and indirect grant recipients. State repeatedly slow rolled Congressional document requests, disregarded prioritized information, and provided incomplete and inadequate productions. This led the Committee to issue a subpoena on June 13, 2024. Despite the fact the Committee subpoenaed documents which it had been requesting for more than 14 months, State said it would take approximately 21 months from the date of the subpoena to produce these documents in full—around March 2026. In the absence of compliance with the subpoena, the Committee now remits this interim report on its present findings until such a time where the subpoenaed information is provided.

## II. Introduction

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Small businesses are the backbone of the U.S. economy, making up more than 99 percent of all domestic businesses and employing nearly half of the American workforce.<sup>1</sup> In order to thrive in today's market, small businesses must be freely able to compete online to earn revenue and grow. They leverage social media to reach new audiences, communicate with customers, market products, earn revenue through platform monetization capabilities, and build their reputations. Two-sided marketplace platforms are essential for online sales. Hosting advertisements on a business' platform is a significant revenue source; conversely, placing advertisements on other online platforms is a major lever for customer growth. Audiences are reached and web traffic driven through internet search engines. News and information outlets publish content on the internet and rely less on traditional paper copies for circulation, using web browsers and social media platforms to reach readers and earn revenue.<sup>2</sup>

A foundational principle of American markets is that a business will be able to operate without unreasonable interference from the government so long as they obey the law. However, as extensive investigative reporting and Congressional investigations show, the Federal government worked with the private sector extensively in recent years to remove or suppress certain disfavored speech from internet platforms, at the expense of fact, impacting the ability of businesses purveying that speech to use those services to compete. This collaboration of public and private entities, including self-proclaimed "fact-checking" organizations, think-tanks, tech companies, universities, wealthy foundations, and government agencies, has become known as the Censorship-Industrial Complex (CIC). The reality of the CIC was revealed when Elon Musk purchased Twitter (now X) and "lifted the Silicon Curtain" to allow investigative journalists to read internal emails between Twitter, government officials, and government partners. The resulting series of reports are known as the *Twitter Files*.

Various Federal agencies and their proxies coordinated with social media companies to have disfavored speech moderated, diminishing impacted businesses' ability to use those platforms.<sup>3</sup> Tech companies changed their Terms of Service (TOS), the rules which dictate the ability to use each platform, as a direct result of government pressure, thereby expanding the content and accounts subject to moderation.<sup>4</sup> Two-sided marketplace platforms changed their TOS at the behest of the Biden-Harris White House, interfering with impacted businesses' sales revenue.<sup>5</sup>

If the private companies were making these content moderation decisions on their own volition, without government interference, that is their right. They are not government entities and are not subject to the same First Amendment constraints; only the government, and its proxies, are barred from imposing viewpoint-based

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<sup>1</sup> *Frequently Asked Questions About Small Business*, U.S. SMALL BUS. ADMIN., OFFICE OF ADVOCACY (July 2024).

<sup>2</sup> Jacob Liedke & Luxuan Wang, *News Platform Fact Sheets*, PEW RESEARCH CENTER (Nov. 15, 2023) (finding only 37 percent of U.S. adults often or sometimes get news from print publications).

<sup>3</sup> Several Federal government bodies, including the Biden-Harris White House, the FBI, the GEC, and the Cybersecurity and Infrastructure Security Agency at the Department of Homeland Security, worked with social media companies to have speech removed from their platforms. Matt Taibbi, *Twitter, the FBI Subsidiary*, SUBSTACK (Apr. 13, 2023) originally released on Twitter (now X), Matt Taibbi (@mtaibbi) (Dec. 16, 2022, 4:00 PM) available at <https://x.com/mtaibbi/status/1603857534737072128?lang=en>; Matt Taibbi, *New Knowledge, the Global Engagement Center, and State-Sponsored Blacklists*, SUBSTACK (Apr. 13, 2023) originally released on Twitter (now X), Matt Taibbi (@mtaibbi) (Mar. 2, 2023, 12:00 PM) available at <https://x.com/mtaibbi/status/1631338650901389322?lang=en>; H. COMM. ON THE JUDICIARY AND THE SELECT SUBCOMM. ON THE WEAPONIZATION OF THE FEDERAL GOV., THE CENSORSHIP-INDUSTRIAL COMPLEX: HOW TOP BIDEN WHITE HOUSE OFFICIALS COERCED BIG TECH TO CENSOR AMERICANS, TRUE INFORMATION, AND CRITICS OF THE BIDEN ADMINISTRATION (May 1, 2024).

<sup>4</sup> Facebook (Meta), YouTube, and Amazon, changed their TOS as a direct result of pressure from the Biden-Harris Administration, enabling increased suppression of speech and removal of content. H. COMM. ON THE JUDICIARY AND THE SELECT SUBCOMM. ON THE WEAPONIZATION OF THE FEDERAL GOV., THE CENSORSHIP-INDUSTRIAL COMPLEX: HOW TOP BIDEN WHITE HOUSE OFFICIALS COERCED BIG TECH TO CENSOR AMERICANS, TRUE INFORMATION, AND CRITICS OF THE BIDEN ADMINISTRATION (May 1, 2024).

<sup>5</sup> H. COMM. ON THE JUDICIARY AND THE SELECT SUBCOMM. ON THE WEAPONIZATION OF THE FEDERAL GOV., THE CENSORSHIP-INDUSTRIAL COMPLEX: HOW TOP BIDEN WHITE HOUSE OFFICIALS COERCED BIG TECH TO CENSOR AMERICANS, TRUE INFORMATION, AND CRITICS OF THE BIDEN ADMINISTRATION (May 1, 2024).

ensorship restrictions.<sup>6</sup> That much of the impacted speech was moderated under mis-, dis-, or malinformation (collectively, MDM) provisions in the name of safety does not matter- the government cannot coerce third parties to censor lawful speech.<sup>7</sup> It is inconsequential whether the government believes that speech is false, as constitutional protection does not turn on upon the truth, popularity, or social utility of the ideas and beliefs which are offered.<sup>8</sup> The government may not even *abridge* the freedom of speech, let alone censor it.<sup>9</sup>

Whether the aforementioned activity rises to unconstitutional violations of the First Amendment is currently before the courts. The preliminary injunction against the government for alleged social media censorship in *Murthy v. Missouri* was reversed and remanded by the Supreme Court (SCOTUS) for the plaintiffs' failure to establish Article III standing and the decision therefore did not reach the merits of the case, much to the chagrin of the dissenting Justices ("The Court, however, shirks that duty and thus permits the successful campaign of coercion in this case to stand as an attractive model for future officials who want to control what the people say, hear, and think;" "It was blatantly unconstitutional, and the country may come to regret the Court's failure to say so").<sup>10</sup> Mark Zuckerberg has since admitted that the Biden-Harris Administration repeatedly pressured Meta to censor content on its platforms, a central theme of *Murthy*.<sup>11</sup>

In addition to coordination to remove specific content, the Federal government also assisted the private sector in detecting alleged MDM for moderation. The GEC, though subject to a strict international mandate, sourced, developed, then platformed and promoted MDM-detection tools directly to the private sector, including to tech platforms with the ability to moderate domestic speech and impact domestic business operations. The GEC also worked with foreign governments with strict internet speech laws (including the United Kingdom and countries in the European Union (EU)) and Federal agencies with no such international restrictions to test these products.

Among the hundreds of companies promoted by the GEC were press credibility-rating organizations whose main function is to demonetize news and information outlets purveying speech purported to be MDM by leveraging partnerships with the advertising industry. These credibility ratings involve the application of subjective criteria, susceptible to the assessor's worldview. Ratings are determined not only by what can be proven factually correct or incorrect, but also by whether narratives are deemed harmful, divisive, or sensational. Certain outlets are given deference in assessment over others. This is why press 'trust' rating systems are inherently flawed- they are subject to the partisan lens of the assessor.

The purpose of the First Amendment's Free Speech Clause is to foster "an uninhibited marketplace of ideas," testing the "truth" of various ideas in the competition of the market.<sup>12</sup> The Federal government cannot support organizations that interfere with domestic press operations based on whether they are considered trustworthy or whether they adhere to certain viewpoints. Government abridgement of viewpoint-based speech

<sup>6</sup> *Police Dep't v. Mosley*, 408 U.S. 92, 95 (1972) ("The First Amendment means that government has no power to restrict expression because of its message, its ideas, its subject matter, or its content.").

<sup>7</sup> While the definitions of these terms vary slightly depending on source, the general meaning of each is as follows: (1) Misinformation: false information conveyed without the intent to harm or mislead; (2) Disinformation: false information conveyed with the intent to harm or mislead; and (3) Malinformation: true information framed in a way that is meant to harm or mislead. By mid-2021 YouTube had removed more than one million videos for alleged COVID-19 misinformation, while Facebook had taken down more than 18 million pieces of similar content. As blame for the results of the 2016 U.S. Presidential election was laid at the feet of MDM on social media platforms, it was not just health they sought to protect; there was immense pressure put on these companies to have and enforce MDM policies to "save democracy" as supposedly threatened by the election of former President Trump. Neal Mohan, *Perspective: Tackling Misinformation on YouTube*, YOUTUBE OFFICIAL BLOG (Aug. 25, 2021); *Murthy, et al. v. Missouri, et al.*, 603 U.S. 46 (2024) (Alito, J., dissenting).

<sup>8</sup> *N.Y. Times Co. v. Sullivan*, 376 U.S. 254, 271-72, 84 S. Ct. 710, 721 (1964); see also *United States v. Alvarez*, 567 U.S. 709, 718 (2012) (plurality opinion) ("Some false statements are inevitable if there is to be an open and vigorous expression of views in public and private conversation.").

<sup>9</sup> First Amendment, U.S. Const. amend. I.

<sup>10</sup> *Murthy, et al. v. Missouri, et al.*, 603 U.S. 38 (2024) (Alito, J., dissenting).

<sup>11</sup> Letter from Mark Zuckerberg, Founder, Chairman, & CEO, Meta Platforms, Inc., to Jim Jordan, Chairman, H. Comm. on the Judiciary (Aug. 26, 2024).

<sup>12</sup> *Red Lion Broadcasting Co., v. F.C.C.*, 89 S. Ct. 1794, 1806 (1969).

and the press is impermissible regardless of which political party it offends.

The internet age has seen the rise of independent media outlets, the vast majority of which are small businesses. They must be free to compete online without government interference. At a time when legacy media is losing trust and audiences by parroting partisan narratives, ironically whether or not that narrative is factually correct, it is more important than ever that independent media outlets be allowed to compete in the free marketplace of ideas. However, as award records and awardee operations show, the scales are tipped in favor of outlets which express certain partisan narratives rather than holding the government accountable.

### III. Committee Investigation

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The Committee opened this investigation following receipt of constituent complaints about partisan ‘fact-checking’ organizations interfering with their ability to compete online. This was concurrent with investigative reporting that uncovered the GEC awarding these companies taxpayer dollars.<sup>13</sup> Given the domestic small business impacts, the flurry of reporting on Federal funds and resources being improperly used to target American speech, and the GEC’s strictly international mandate, the Committee sent an initial request for award records to the GEC on June 7, 2023. Subsequent requests for additional documentation were made over the course of one year, during which the Committee gave significant leeway in time and scope to State. Despite these accommodations, only two heavily redacted lists of awardees were produced, with none of the requested award application, risk assessment, or contract information.

This fractional production, in addition to State’s significant delays, responsive failures, inattention to detail, and failure to perform simple due diligence to resolve issues, led the Committee to subpoena State for the information on June 13, 2024. Despite the subpoena, to date, the vast majority of requested documents have not been produced. State has informed Committee staff that the subpoena will take an inexcusably long time to fulfill - approximately 21 months. State has had 14 months to comply with Committee requests and should have been working on fulfillment prior to the issuance of the subpoena. Further, State and the GEC are subject to several overlapping investigations which would have caused them to already compile relevant information. The aforementioned failures are all indicative of a wider problem experienced by other committees- that the Biden-Harris Administration does not properly adhere to Congressional oversight.

Thanks to extensive work across this space, the Committee was able to learn from the findings of other committees and investigative journalists when stonewalled by the Biden-Harris Administration. Over the course of this investigation, the Committee reviewed the following: Federal award applications, contracts, and progress reports; Federal agency communications, meeting notes, and reports; Office of the Inspector General (OIG) reports; Congressional committee reports, hearings, and Statements for the Record; Freedom of Information Act (FOIA) productions; private company reports, press releases, and tax documents; news articles, independent investigative reports, interviews, court filings and rulings, and statutes. The approximate total pages reviewed is 6,185. The interviews and hearings total approximately 40 hours.

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<sup>13</sup> Gabe Kaminsky, *Disinformation Inc: Meet the groups hauling in cash to secretly blacklist conservative news*, WASH. EXAMINER (Feb. 9, 2023).

## IV. Small Business: Instruments & Casualties of the Censorship-Industrial Complex

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The Federal government is a primary component of the CIC, and it is this nexus which concerns the Committee. Investigative journalists and other Congressional committees have examined the Federal government's involvement in the CIC in depth, especially pertaining to speech on social media. The GEC is not the only bad actor in this space, but it is the only Federal entity known to this Committee: (1) whose purpose is countering foreign disinformation that threatens the United States, (2) that coordinates directly with the private sector to combat said disinformation, (3) that administers taxpayer dollars to small private entities that interfere with the ability of American businesses to compete online because of their lawful speech, and (4) that gives platforms to tech start-ups/small businesses in the surveillance space and promotes their capabilities to private companies, Federal agencies, and foreign governments that are heavily involved in the censorship apparatus.

Much of the GEC's work is reputable on its face. Building "resilience to violent extremist propaganda and ideology" is a worthy cause when the target audience is those susceptible to the influence of ISIS, for example.<sup>14</sup> An award purpose of diminishing "the influence of ISIS" and decreasing "its allure in the eyes of potential recruits and sympathizers" is squarely within the GEC's mission and Congressional mandate, which is: "[t]o direct, lead, synchronize, integrate, and coordinate efforts of the Federal Government to recognize, understand, expose, and counter foreign state and foreign non-state propaganda and disinformation efforts aimed at undermining or influencing the policies, security, or stability of the United States, its allies, and partner nations."<sup>15</sup> Congress explicitly included a restriction with that mandate, that "[n]one of the funds authorized [...] shall be used for purposes other than countering foreign propaganda and misinformation that threatens United States national security."<sup>16</sup>

A review of recent direct and indirect awards administered by the GEC in furtherance of its mission demonstrates that, intentionally or not, the GEC has had impacts on domestic business operations. Speech surveillance tools owned by domestic small businesses were promoted to the private sector, Federal agencies, and foreign governments with no international activity restrictions. Federal funds were awarded to grow products of small entities whose main operations focus on domestic businesses that operate to demonetize businesses based on lawful speech. There are some awardees who tout ideological beliefs as fact, and work to diminish the reputation of American businesses if their speech negates those narratives. The GEC should be aware of this, as they are required to do extensive vetting of each awardee in advance of administering funds and performed similar due diligence prior to promoting and testing each disinformation detection tool. It is stated verbatim in some award applications that applicants' main operations were focused on the speech of businesses based in the U.S., and the GEC chose to fund them nonetheless.

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<sup>14</sup> State Production to H. Comm. on Small Bus. (Dec. 3, 2023); On file with the Comm.

<sup>15</sup> *Id.*; John S. McCain National Defense Authorization Act for Fiscal Year 2019, Pub. L. No. 115-232, § 1284, 132 Stat. 1636, 2076 (2018); *Mission & Vision, Global Engagement Center*, U.S. DEP'T OF STATE (last visited Jul. 30, 2024).

<sup>16</sup> National Defense Authorization Act for Fiscal Year 2017, Pub. L. No. 114-328, § 1287, 130 Stat. at 2548 (2016).

# 1. Global Engagement Center Origin & Mission Expansion

In the wake of the September 11<sup>th</sup>, 2001 terrorist attacks, there was an interest by policy makers to address a central question: “why do they hate us?”<sup>17</sup> First turning to State’s public diplomacy staff for answers, consensus was eventually reached that, while public diplomacy was essential to winning the war on terror, the government was “fighting a 21<sup>st</sup> century communications war using 20<sup>th</sup> century tools and platforms.” This void led to the establishment of the GEC’s precursor entities.

The U.S. Advisory Committee on Public Diplomacy issued a report in May 2024 that narrates the mission creep of the GEC and its predecessors from the original focus on countering specific terrorist organizations post 9/11, to various global non-state violent extremist threats, to disinformation from state actors like Russia, China, and Iran. Expansion in resources and private sector coordination are also detailed, as well as hinderances and priority changes between administrations. It does not cover any activity in the Biden-Harris Administration save for one sentence on headcount in FY 2021. The report notes that “many historical records [...] have not been preserved, making it difficult to find key documents related to the [GEC and its precursors] and to reconcile conflicting accounts of events.”<sup>18</sup>

In January 2016, the Obama White House announced the: (1) establishment of an interagency task force for countering domestic violent extremism; (2) creation of the GEC; and (3) appointment of Michael Lumpkin as the new GEC Special Envoy and Coordinator, who brought with him strong ties to the military and intelligence communities.<sup>19</sup> Lumpkin compared the launch of the GEC to “the establishment of the Office of Strategic Services (the predecessor of the Central Intelligence Agency (CIA)) during World War II” during the GEC’s inaugural staff meeting.<sup>20</sup>

Executive Order (EO) 13721 was signed into law on March 14, 2016, officially establishing the GEC and defining its interagency role. To drive this home, EO 13721 also created a multi-agency Steering Committee composed of senior representatives of Federal agencies whose work was relevant to the GEC. Chaired by the Under Secretary of State for Public Diplomacy, members included a senior official from: the Department of Defense (DOD), the Department of Justice (DOJ), the Department of Homeland Security (DHS), the Department of Treasury, the Small Business Administration (SBA), the National Counterterrorism Center, the Joint Chiefs of Staff, the Counterterrorism Center of the CIA, the Broadcasting Board of Governors, and the U.S. Agency for International Development (USAID).<sup>21</sup> It is not clear as to what the Steering Committee looks like in its present form or what the SBA’s role is as SBA representatives supposedly do not know the answer to that question.<sup>22</sup>

A significant mission expansion followed with the passage of the FY 2017 National Defense Authorization Act (NDAA), signed into law by President Obama on December 23, 2016, which: (1) grew the GEC’s authority, resources, and mandate to support a whole-of-government approach “to expose and counter foreign disinformation operations and proactively advance fact-based narratives that support U.S. allies and interests;” (2) broadened the GEC’s threat focus beyond violent extremism to include state actors; (3) gave the GEC grant making authority; and (4) established a fund to build a network of private sector actors.<sup>23</sup>

In 2018 sizeable funds were transferred from the DOD to the GEC for initiatives to counter propaganda and disinformation from foreign nations.<sup>24</sup> These included the creation of the Information Access Fund (IAF)

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<sup>17</sup> *The Global Engagement Center: A Historical Overview 2001-2021*, U.S. ADVISORY COMM’N ON PUBLIC DIPLOMACY, 11 (May 2024).

<sup>18</sup> *Id.* at 6.

<sup>19</sup> *Id.* at 27.

<sup>20</sup> *Id.*

<sup>21</sup> *Id.* at 28.

<sup>22</sup> Email from George Holman, Jr., Associate Administrator, Office of Congressional & Leg. Affairs, U.S. Small Bus. Admin., to Stephanie Chambliss, Senior Investigative Counsel, H. Comm. on Small Bus. (Aug. 28, 2024).

<sup>23</sup> National Defense Authorization Act for Fiscal Year 2017, Pub. L. No. 114-328, § 1287, 130 Stat. 2000, 2546- 48 (2016); *The Global Engagement Center: A Historical Overview 2001-2021*, U.S. ADVISORY COMM’N ON PUBLIC DIPLOMACY, 30 (May 2024).

<sup>24</sup> *The Global Engagement Center: A Historical Overview 2001-2021*, U.S. ADVISORY COMM’N ON PUBLIC DIPLOMACY, 33 (May 2024).

which allowed for the provision of grants to civil society groups, media content providers, nongovernmental organizations (NGOs), Federally funded research and development (R&D) centers, private companies, and academia to advance their work in the counter-disinformation and propaganda space.<sup>25</sup>

In the FY 2019 NDAA, the GEC's scope was again broadened beyond "lead, synchronize, and coordinate," to also "direct" and "integrate" government efforts to counter foreign disinformation and propaganda.<sup>26</sup> The GEC was now aimed at "much more than undermining national security interests" as directed by the original legislation.<sup>27</sup>

Though not explicitly stated in the report, this broadened scope accompanied the expansion of the GEC's approach from "whole-of-government" to "whole-of-society." This is reflected in the below talking points from a symposium hosted by the Atlantic Council's Digital Forensic Research Lab (DFRLab). This mirrors the categorization other CIC entities have used when justifying their cooperation with various sectors to promote or remove certain speech.

#### Countering Efforts With Whole-of-Society Approach

- At the GEC, we are committed to our mission of leading and coordinating the U.S. government's role within the counter-disinformation community.
- In order to ensure our societies are capable of both reflecting our democratic values and fighting disinformation, we believe that we all, and also other nations must build counter-disinformation communities of their own.
- To be clear, when we say counter-disinformation community, we are talking about a society-wide effort that includes government, media, and civil society organizations that use the truth to build resiliency so that disinformation is less effective.
- We truly need more than just a government approach, we need a whole-of society approach and that is another reason why I am very happy to be here to discuss this will of you.
- The GEC is focused on expanding our partnerships and are looking forward to new and expanding ways to connect with you all.

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The two-decades long growth in mission and threats demonstrates why the GEC is a useful tool for coordinating efforts within the Federal government to detect, understand, and counter dangerous propaganda circulating internationally. However, somewhere along the GEC's mission expansion, its methodologies changed from using social media platforms to create and spread counterpropaganda materials, to directing public opinion by trying to get social media platforms to suppress content. It is this distinction that is the issue; the government should not be using its position of power to influence the moderation of lawful speech.

## **2. The Technology Engagement Team & Private Sector Engagement**

The Technology Engagement Division, also known as the Technology Engagement Team (TET), is the GEC functional unit that focuses on the technological aspects of disinformation and is responsible for working with social media companies and the tech industry as a whole. The very limited set of the TET's communication with the private sector reviewed by this Committee included briefings from tech platforms on their MDM moderation activity and GEC-directed submission of content the GEC believed violated platform TOS. This included specific pieces of content and accounts belonging to both individuals and businesses, such as international media outlets they determined to be purveyors of disinformation.

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<sup>25</sup> *Id.* at 33.

<sup>26</sup> *Id.* at 36.

<sup>27</sup> *Id.*; John S. McCain National Defense Authorization Act for Fiscal Year 2019, Pub. L. No. 115-232, § 1284, 132 Stat.1636, 2076 (2018).

<sup>28</sup> Global Engagement Center notes for Atlantic Council Digital Forensic Research Lab 360/STRATCOM Roundtable Speech (date unknown); On file with the Comm.

The TET has had “regular ongoing engagements with major [tech] companies (including Microsoft, Twitter, Facebook/Meta, and Google/YouTube) since 2019.”<sup>29</sup> In December 2019, the GEC “established a Silicon Valley representative to facilitate public-private coordination and broker constructive engagements between the U.S government and the tech sector, academia, and research.”<sup>30</sup> An internal GEC slide deck titled “Tech Sector Outreach, Company Headlines, and TE Program Highlights” identifies specific tech companies with which the GEC was in communication, including executive-level points of contact at each company, news highlights, and additional organizational information. Companies featured included Adobe, Alphabet/Google, Meta (Facebook/Instagram), Microsoft/LinkedIn, and Twitter (now X).

Communication in the limited records reviewed by the Committee was especially prevalent with Meta and Twitter, though the GEC’s relationship with both companies evidently waxed and waned between administrations. As shown by internal emails in the *Twitter Files*, Twitter was hesitant to work with the GEC during the Trump Administration (compared to their more established relationships with the FBI and other Federal agencies) because, among other reasons, it was “more political.”

 **Yoel Roth** May 6, 2020 at 7:39 PM  
Re: [Action Requested] Read-Out State/GEC  
To: [REDACTED] Patrick Conlon & 8 more [Details](#)

Thanks, all. Catching up on email today. Three high level thoughts:

- 1) GEC's blitz on these issues is at least in part an attempt to insert themselves into the conversations we've had with DHS, FBI, ODNI, and others. Per Facebook, they've explicitly requested to participate in those conversations. Obviously, State is a significant voice and one we don't want to neglect; but I do want us to continue to maintain a distinction between the highly trusted, valued relationships we've built over years with entities with considerable expertise and authority in these domains, and other parts of USG that may engage on these questions from time to time (sometimes in more political ways than others).
- 2) The political angle is really important here. Site Integrity's engagement with DHS/FBI/etc has been fruitful precisely because they're **(generally) apolitical**. GEC has a track record of actively advancing specific ideological agendas (e.g. their work w/r/t Iran). We should not lose sight of this distinction.
- 3) While I have reservations about GEC's position here, I see Public Policy as the strategic drivers of our engagement with USG — with myself and the rest of the SI team supporting that strategy with our specific subject matter expertise. If you tell us to meet with someone, we're gonna meet with them. Use your power responsibly. :)

Yoel

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By the time the Biden-Harris Administration had settled in, the TET held monthly meetings with Meta, with frequent email communication. With Twitter, they held quarterly meetings from at least early 2021, also with frequent email communication. The TET entered discussions with Twitter for an API developer account in January 2021 and applied on March 16, 2021, which was evidently rejected by Twitter, then reconsidered less than a week later following direct outreach by Daniel Kimmage, then Acting Coordinator of the GEC.<sup>32</sup>

The TET’s relationship with social media companies was so successful that USAID consulted the TET for tips on how to work with tech companies to get them to be amenable to their content moderation wishes:

<sup>29</sup> Email from Global Engagement Center Tech. Engagement Team to USAID (Dec. 15, 2021) (on file with the Comm.).

<sup>30</sup> TET Newsletter: The Paperwork Brief, Vol. 2 Ed. 5 (Sep. 3, 2021) (on file with the Comm.).

<sup>31</sup> Matt Taibbi, *Twitter and the FBI “Belly Button,”* SUBSTACK (Apr. 13, 2023) originally released on Twitter (now X), Matt Taibbi (@mtaibbi) (Jan. 3, 2023, 4:54 PM) available at <https://x.com/mtaibbi/status/1610394197730725889?lang=en>.

<sup>32</sup> Email from Daniel Kimmage, Acting Coordinator, Global Engagement Center, to Twitter (Mar. 19, 2021) (on file with the Comm.).

I was connected to [REDACTED] (and then [REDACTED] based on a conversation related to USAID/Ethiopia and questions about how we elevate content moderation issues related to mis/dis/mal-information (MDM) to global technology platforms like Facebook, Twitter and YouTube. We'd love to learn from your private sector engagement approach and potentially collaborate on that engagement when we are working in the same places or on the same issues.

Here was the agenda that I drafted for our meeting with Sam:

- Introductions from USAID (OTI/ITR/DRG) and State (GEC)
- Recent Content Moderation Issues
- Process for Engaging Tech Platforms
- Opportunities to Collaborate

When you are settled in your new role, I'd love to introduce you to a few of my colleagues at USAID who are thinking through how to engage "Big Tech" and follow-up on deliverables from the Summit for Democracy. Maybe sometime in January or February?

Until then, happy holidays!

[REDACTED]

[REDACTED]

Senior Digital Technology Advisor for Field Programs Division  
 Bureau for Conflict Prevention and Stabilization | Office of Transition Initiatives | Creative Digital Team  
 US Agency for International Development  
 Mobile: [REDACTED] | [REDACTED] [usaid.gov](https://www.usaid.gov)

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### 3. Awards

The GEC awards produced to the Committee are summarized below, though it is clear some subawards were not produced. Additionally, single redactions can represent multiple subawardees, and State did not produce unredacted copies despite the Committee's multiple requests.

Fiscal Year	Direct Awards	Subawards
2018	39 (37 cooperative agreements, 2 project grants)	48 known, 7 unknown redactions
2019	9 (all cooperative agreements)	9 known, 4 unknown redactions
2020	8 (7 cooperative agreements, 1 direct to individual)	5 known, 4 unknown redactions
2021	14 (all cooperative agreements)	11 known, 2 unknown redactions
2022	14 awards (all cooperative agreements)	5 known, 5 unknown redactions
2023	24 awards (all cooperative agreements)	5 known, 18 unknown redactions
2024	No information provided	No information provided

Of the limited award records reviewed by the Committee, there are many which have direct and downstream domestic impacts and whose implementation brings the GEC's compliance with its international mandate into question. One such award was to the Institute of War & Peace Reporting (IWPR), which administered a subaward to the Poynter Institute for Media Studies, Inc. (Poynter). This subaward was used to convince international news outlets to join Poynter's International Fact-Checking Network's (IFCN) Code of Principles, which is a group of news and information organizations that abide by a certain set of qualities denoting journalistic standards.<sup>34</sup> To

<sup>33</sup> Email from USAID to Global Engagement Center Tech. Engagement Team (Dec. 22, 2021) (on file with the Comm.).

<sup>34</sup> *The Commitments of the Code of Principles*, International Fact-Checking Network, Poynter (last visited Jul. 22, 2024); *Countering Disinformation and Propaganda: Lessons From Practitioners*, The Institute for War & Peace Reporting for the Global Engagement Center, U.S. Dep't of State (Jun. 16, 2022) (on file with the Comm.); Email from Baybars Örsek, Director, International Fact-Checking Network, to Tech. Engagement Team, Global Engagement Center, U.S. Dep't of State (Sep. 17, 2020) (on file with the Comm.).

join the Code of Principles, organizations must apply and be accepted by the IFCN’s assessors.<sup>35</sup> It appears that in implementing this award, GEC staff was added to a Google Group email in which IFCN assessors (including representatives from the NED and fact-checking organizations Snopes, Full Fact, and Poynter/IFCN) critiqued applicants, including domestic businesses such as *The Daily Caller* and its fact-checking organization.<sup>36</sup>

The limited communications viewed by this Committee did not show the GEC actively participating in the conversations of whether to admit applicants to the Code of Principles, only receiving pertinent emails. There were, however, emails from NED staff, using NED email addresses, opining on *The Daily Caller*’s credibility.<sup>37</sup>

On Mon, Feb 22, 2021 at 6:30 AM Dean Jackson <mailto:[redacted]@ned.org> wrote:  
On the other hand, you really have to ask yourself if you want to be featured on a website with a history of <https://www.snopes.com/news/2018/09/06/many-daily-caller-writers-expressed-white-supremacist-views/>, next to headlines like “<https://dailycaller.com/2021/02/19/public-schools-woke-liberal-activism-critical-race-theory-teachers-unions-enrollment-private-schools/>.”

It’s something everyone has to answer for themselves. I personally wouldn’t lend them the credibility.

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It is not appropriate, given their strict international constraints, that the GEC or the NED would belong to a cohort that gatekeeps domestic press companies from belonging to a private credibility organization. As set forth in its Articles of Incorporation and the National Endowment for Democracy Act, it is a violation of the NED’s mandate to operate domestically, and therefore to interfere with the operations of domestic press.<sup>39</sup>

There are several other GEC awards which have domestic business and specifically domestic press impacts. One such award was to a small domestic business and included deliverables to seek out and promote internet surveillance products to GEC partner-entities for their use. These partners are not subject to international restrictions; the private sector partners in the tech industry moderate domestic speech and impact the ability of domestic small businesses to compete online.

## A. Park Advisors

Park Capital Investment Group, LLC (Park Advisors) was a domestic small business founded in 2014 for which minimal entity information is available. Its GEC award contracts list an address of a house in a residential neighborhood in Virginia. It is apparently no longer operational as its website has no information other than a picture of trees.<sup>40</sup>

In FY 2018, Park Advisors received a GEC cooperative agreement award of more than \$6 million. Deliverables included drafting research reports and assisting the GEC in developing a Testbed methodology, the Disinfo Cloud platform, a Tech Demo Series, three international Tech Challenges, and a “diverse network of

<sup>35</sup> *The Commitments of the Code of Principles*, International Fact-Checking Network, Poynter (last visited Jul. 22, 2024).

<sup>36</sup> Email from Barbara Örsek, Director, International Fact-Checking Network, to fakenewssci@googlegroups.com (Aug. 31, 2022) (on file with the Comm.); Email from David Mikkelson, Snopes, to fakenewssci@googlegroups.com (Feb. 22, 2021) (on file with the Comm.).

<sup>37</sup> Email from Dean Jackson, National Endowment for Democracy, to fakenewssci@googlegroups.com (Feb. 22, 2021) (on file with the Comm.).

<sup>38</sup> *Id.*

<sup>39</sup> Founding Statement of Principles and Objectives, 1984, National Endowment for Democracy (last visited Aug. 22, 2024); 22 C.F.R. § 67 (current as of May 5, 2023); National Endowment for Democracy Act, 22 U.S.C. § 4411.

<sup>40</sup> Homepage, PARK ADVISORS (last visited Jul. 19, 2024) <https://www.park-advisors.com/>.

relevant stakeholders.”<sup>41</sup>

**PROJECT INFORMATION**

Grantee:	Park Capital Investment Group LLC, dba Park Advisors
Project Title:	Research, Analytics, and Technology for Identifying and Countering Foreign State Propaganda and Disinformation
Grant Number	SGECPD18CA0024
Funding Amount:	\$6,338,345.00
Grant Dates:	25 September 2018 – 31 December 2021
Quarter (Dates) being reported:	Q4 2021 (October - December 2021)
Date Progress Report is submitted:	January 30, 2022
Primary contact/Title	Christina Nemr/Director
Phone Number:	[REDACTED]
Email:	nemr@park-advisors.com

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In executing its Statement of Work, Park Advisors distributed subawards to several companies, most of which are small businesses.

Objective Alignment	Award Purpose	Subawards	Subaward Amount
Expose foreign state and foreign non-state actors’ tactics and efforts that spread propaganda and disinformation to foreign audiences.	To test and engineer novel technological solutions – through combination, hybridization, or other applications of existing technologies as required by the GEC – to the problems of foreign propaganda and disinformation, and rapidly make those technologies available for use by the GEC and its partners.	Atlantic Council	\$150,000
		Babel Street	\$250,000
		DROG ADTAC	\$250,000
		NewsGuard	\$50,000
		Trend Micro Check	\$175,000
		Cyabra	\$75,000
		AIfluence	\$83,000
		Sea Monster	\$80,000
		Congo Check	\$83,000
		InVid/WeVerify	\$100,000
		Institute for Strategic Dialogue	\$50,000
		Global Disinformation Index	\$100,000

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**i. Testbed Methodology & Disinfo Cloud**

The main Park Advisors deliverable was to design a Testbed initiative which allowed participants to learn about and test disinformation detection products in a sandbox environment. The GEC leveraged Park Advisors to source technologies, largely from small domestic businesses, to add to the sandbox for its partners to test. These partners– foreign governments, Federal agencies, and the private sector– are not subject to the same international restrictions as the GEC. The private sector tech partners testing these products moderate not only foreign speech

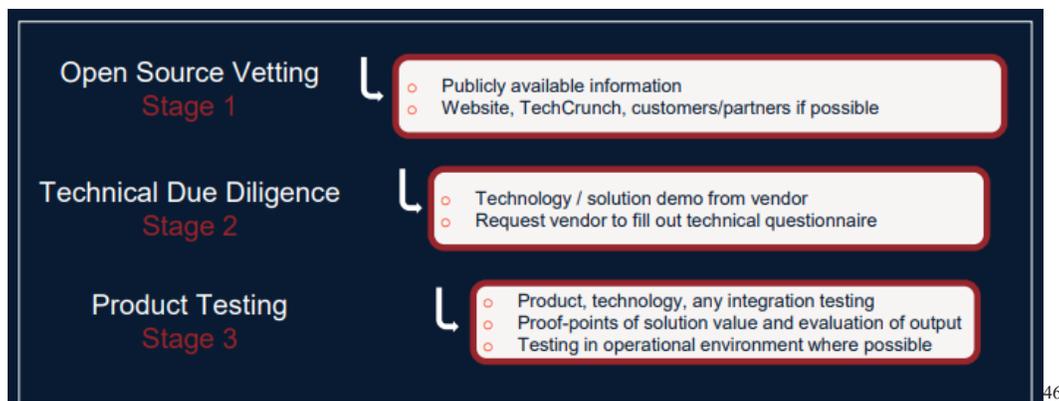
<sup>41</sup> Park Advisors worked with the TET to develop two reports: (1) “*Weapons of Mass Distraction: Foreign State-Sponsored Disinformation in the Digital Age*,” a review of the human and technological vulnerabilities to propaganda and disinformation with an overview of countries known for such operations; and (2) “*Fanning the Flames: Foreign State-Sponsored Disinformation in the Time of COVID*,” which examined how the pandemic and resulting “infodemic” was exploited by hostile state actors and detailed the responses by governments, online platforms, and civil society. Both reports were distributed to government, academia, think tanks, and the private sector; Christina Nemr, *The Disinfo Cloud Digest*, DISINFO CLOUD (Dec. 21, 2021); Quarterly Performance Report, Park Capital Investment Group LLC, dba Park Advisors (Q4 2021) (on file with the Comm.).

<sup>42</sup> Quarterly Performance Report, Park Capital Investment Group LLC, dba Park Advisors (Q4 2021) (on file with the Comm.).

<sup>43</sup> State Production to H. Comm. on Small Bus., 2 (Mar. 28, 2024) (on file with the Comm.).

on their platforms, but also domestic speech and domestic businesses' use of their products. There was no firewall in place to ensure that Federal resources were not being used to develop and promote technologies that would have domestic impacts.

A three-stage methodology was used for assessing and testing technologies, with Stage 1 as evaluation, Stage 2 as assessments, and Stage 3 for testing.<sup>44</sup> Each Stage had nine criteria against which to test the tool and concluded with a report.<sup>45</sup>



In total, 33 tools reached the operational testing stage with 25 participant offices, including from the GEC, DOD, embassies, and foreign governments.<sup>47</sup> Eight of the tests resulted in longer implementation, while others resulted in non-GEC participants expressing interest in longer term use pending funding availability.<sup>48</sup>

The Testbed's priority was "identifying challenges against which to test technologies," which this Committee interprets to mean 'looking for use cases.' In conversations with businesses who had products of interest for the Testbed, to get their buy-in to participate, the most common questions concerned "whether the Testbed would lead to longer-term contracts," and "whether companies should expend resources and time engaging in a process that might not yield such contracts."<sup>49</sup> This led the GEC to recognize the need to "ensure that the Testbed process first identified offices, agencies, or organizations with relevant use cases and with the necessary budget to spend if the outputs of the test fill a persistent gap."<sup>50</sup> This conclusion by the GEC suggests that the goal of testing these technologies was not just for the use of the GEC and may therefore have sought solutions for entities without a strict international mandate.

The Testbed technologies and their results from the analysis stages were hosted on a searchable repository called Disinfo Cloud, developed using \$1,179,000 of the Park Advisors award.<sup>51</sup> The Disinfo Cloud dashboard, pictured below, displayed the number of technologies on the Testbed, the number of technologies at each stage of assessment, and the types of technologies they represented.<sup>52</sup>

<sup>44</sup> Quarterly Performance Report, Park Capital Investment Group LLC, dba Park Advisors (Q4 2021) (on file with the Comm.).

<sup>45</sup> 2.09 *MadSci Weaponized Information: Technology Engagement team & Disinfo Cloud – Alexis Frisbie & Christina Nemr*; Global Engagement Center; U.S. Department of State, MAD SCIENTIST WEAPONIZED INFORMATION VIRTUAL CONFERENCE, YOUTUBE (Jul. 21, 2020) available at <https://www.youtube.com/watch?v=YoeHq5gX0dA>.

<sup>46</sup> *Id.*

<sup>47</sup> Quarterly Performance Report, Park Capital Investment Group LLC, dba Park Advisors (Q4 2021) (on file with the Comm.).

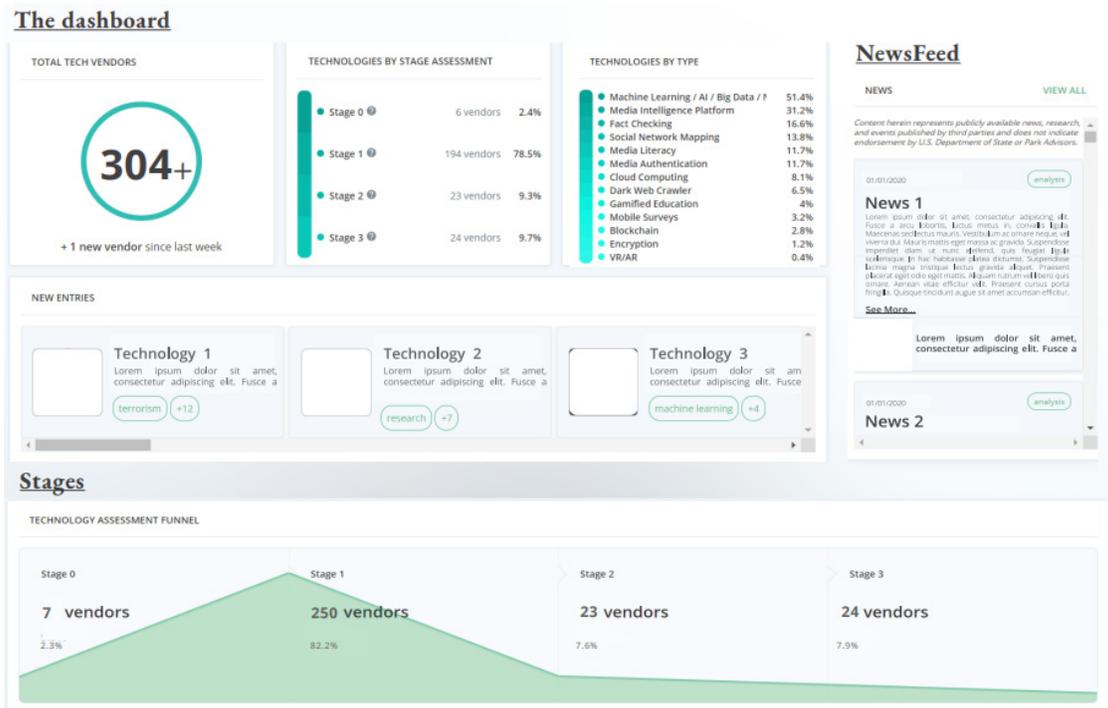
<sup>48</sup> *Id.*

<sup>49</sup> *Id.*

<sup>50</sup> *Id.*

<sup>51</sup> 2023.02.14-GEC-GDI-BLACKLIST, 3 (Mar. 2, 2023) (on file with the Comm.).

<sup>52</sup> *Defeat Disinfo*, U.S. DEP'T OF STATE (last visited Aug. 1, 2024).



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Featured products were promoted to Disinfo Cloud’s users, which included Federal agencies, foreign governments, academia, the private sector (including social media companies), journalists, and civil society organizations.<sup>54</sup>

## Disinfo Cloud and the Testbed are used by:

### Interagency

The Census Bureau, U.S. Congress, Department of Defense, Department of Energy, Department of Homeland Security, Department, Department of state, Federal bureau of Investigation, Office of Global Affairs, Office of the Director of National Intelligence, the Treasury Department, U.S. Agency for Global Media, U.S. Department of Agriculture

### Foreign Partners

Australian Government, Estonian Government, European Union, and the United Kingdom Government

### Providers

Including Academia, Private Sector, and Tech Vendors

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There were both private password-protected features of the platform and information on a public-facing landing page. Categories of disinformation detection tools in the database were listed on the public-facing site, and users of the password-protected features were able to test those technologies, which totaled 366 tools by project completion. Hosted technology included: social listening tools, adtech, manipulated information assessment tools, dark web monitoring, crowd-sourced content assessment and web annotation, blockchain-based media

<sup>53</sup> *Id.*

<sup>54</sup> *Disinfo Cloud flyer*, TECH. ENGAGEMENT TEAM, GLOBAL ENGAGEMENT CENTER (Jul. 15, 2020).

<sup>55</sup> *Defeat Disinfo*, U.S. DEP’T OF STATE (last visited Jul. 13, 2024).

authentication, fact-checking, gamified education, and, ironically, internet “censorship circumvention” products.<sup>56</sup> A report issued just prior to project close details the following statistics as of December 10, 2021:

- a. 365 hosted technologies;
- b. 1,883 password-protected users, with the majority from State and DOD;
- c. users from 36 foreign governments; and
- d. 30,814 individuals who visited Disinfo Cloud’s public-facing platform.<sup>57</sup>

#### Disinfo Cloud User Metrics

1. Disinfo Cloud users (# of registered users)
  - a. 1,883 total user sign-ups as of the end of December 2021
    - 930 (50%) sign-ups are USG users (.mil/.gov)
  - b. 584 user sign-ups from January to November 2021
    - 261 (45%) sign-ups were USG users
  - c. [See here](#) for a breakdown of all user sign-ups
2. Demographic breakdown of users
  - a. Countries of origin:
    - The top countries of origin for all user sign-ups are: U.S. (81.6%), UK (3.5%), Nigeria (1.2%), Australia (1%), Taiwan (.9%), Belgium/Canada (.8%), Netherlands (.5%), Kenya (.4%), and Poland (.4%).
    - The top countries of origin for foreign government user sign-ups are: UK (41%), Australia (21%), Canada (5%), Czech (2%), Estonia (2%), France (2%), Netherlands (2%), Germany (2%), Singapore (2%), and Spain (2%)
    - 36 countries represented in user sign-ups (alphabetical order): Australia, Brazil, Cameroon, Canada, Czech Republic, Denmark, Estonia, France, Germany, Hungary, Israel, Kenya, Latvia, Lesotho, Liberia, Lithuania, Macedonia, Netherlands, New Zealand, Nigeria, Norway, Philippines, Poland, Romania, Singapore, Slovakia, Somalia, South Africa, Spain, Sweden, Taiwan, Uganda, UK, Ukraine, US, and Zambia
  - b. Sector and organizational type breakdown:
    - The users represent the following sectors: 1,079 from the U.S. government (including 504 from the Department of Defense and 456 from the Department of State), 309 from the tech sector, 379 from private industry and academia, 70 from foreign governments and 26 from international organizations.
    - USG (58%) - including but not limited to DOD, DOS, DHS, DOJ, CIA, AGM, DOE, Congress, and State governments
    - Tech / Private Sector (17%) - including but not limited to Google, Twitter, Microsoft, Mozilla, Salesforce, Deloitte, IBM, Accenture
    - Foreign governments (4%) - including but not limited to the UK, Australia, Canada, Brazil, Estonia, France, Germany, the Netherlands, Spain, Singapore, and New Zealand.
    - International Organizations (2%) - including but not limited to the EU, NATO, UN
    - Other (19%) - including but not limited to academia (NYU, Stanford, Harvard, MIT, University of Maryland), think tanks (RAND, Atlantic Council), consulting and development firms (Sayara International, PUBLIC), media (Tech Crunch, The Hill, MisinfoCon) and civil society and NGO (Code for Africa, CogSec Collaborative, Konrad Adenauer Foundation).

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<sup>56</sup> *Tools Overview*, DISINFO CLOUD, (Dec. 25, 2022) available at <https://web.archive.org/web/20220125194018/https://disinfocloud.com/tools-overview/>.

<sup>57</sup> End of Year Accomplishments for CY21, Disinfo Cloud, Global Engagement Center (Dec. 16, 2021) (on file with the Comm.).

<sup>58</sup> *Id.*

## Disinfo Cloud Tech Vendor Metrics

### 1. Tech vendor breakdown

- a. 363 total tech vendors featured on Disinfo Cloud as of the end of November 2021. [See here](#) for all tech vendors (private facing page).
- b. The top technology types featured on Disinfo Cloud are:  
[these are not mutually exclusive]

AI/Big Data (57%)	Media Intelligence Platform (30%)	Fact Checking (19%)	Social Network Mapping (17%)	Media Literacy (15%)	Media Authentication (12%)
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- c. 108 tech vendors/tools were identified, vetted, and added to Disinfo Cloud in 2021.

### 2. Most visited tech vendors

- a. The top five most visited tech vendors since Disinfo Cloud was launched:

1) Vidrovvr	2) Zignal Labs	3) Cyabra	4) Logically	5) WeVerify
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- b. The most visited tech vendor in 2021:

1) Logically	2) Zignal Labs	3) Meltwater	4) Yonder	5) FakeNetAI
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### 3. Assessments uploaded in 2021

- a. Stage 1 Assessments
  - 266 have been uploaded to Disinfo Cloud since launch
  - 87 were uploaded in 2021 (as of November 2021)
- b. Stage 2 Assessments
  - 24 have been uploaded to Disinfo Cloud since launch
  - 2 were uploaded in 2021 (as of November 2021)
- c. Stage 3 Assessments
  - 28 have been uploaded to Disinfo Cloud since launch
  - 10 were uploaded in 2021 (as of November 2021)

### 4. Tech vendors identified for Tech Demo Series (TDS)

- a. Disinfo Cloud Tech Vendor sign-ups have served as a way to identify and vet potential presenters for GEC's TDS. In 2021 ViralMoment and Geollect both presented at the TDS after being identified through Disinfo Cloud. Additional information sessions were set up with Crisp Thinking and Keshif in 2021, among others.

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While the vast majority of Testbed companies and products are unknown to the Committee as the subpoena has not been fulfilled, most of the known companies offer products that surveil social media and other online speech, often using AI/machine learning, internet wide. Their work is not restricted to international speech and some of these tools are used by social media companies to track disinformation on their platforms and make content moderation decisions.

Disinfo Cloud's blog, branded *The Disinfo Cloud Digest*, had a "Spotlight" series which showcased the different technologies on the platform, putting further Federal government support behind them.<sup>60</sup> Among the technologies in the Spotlight series was NewsGuard, discussed further in this report, and Logically.AI, a tool for monitoring the online media landscape for the spread of potentially harmful narratives, which is not focused solely on international speech.<sup>61</sup> It is alleged in *State of Texas, et al. v. U.S. Department of State, et al.* that the GEC featuring Logically.AI in its Spotlight series demonstrates harm to domestic press operations.<sup>62</sup> Three months after Logically.AI was featured in the Spotlight series, Facebook (Meta) retained Logically.AI as a fact-checking partner.<sup>63</sup> Logically.AI explained that when it "rates a piece of content as false, Facebook will significantly reduce its distribution so that fewer people see it, apply a warning label to let people know that the content has been rated false, and notify people who try to share it."<sup>64</sup> Logically.AI has implemented multiple negative assessments of the

<sup>59</sup> *Id.*

<sup>60</sup> Quarterly Performance Report, Park Capital Investment Group LLC, dba Park Advisors (Q4 2021) (on file with the Comm.).

<sup>61</sup> *The Disinfo Cloud Digest*, DISINFO CLOUD (Apr. 6, 2021); Homepage, Logically.AI (last visited Jul. 21, 2024).

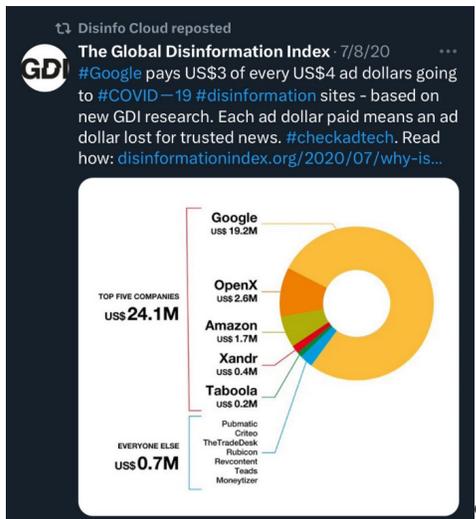
<sup>62</sup> *State of Texas, et al. v. U.S. Dept. of State, et al.*, No. 6:23-cv-00609-JDK, 21 (E.D. Tex. Apr. 10, 2024).

<sup>63</sup> *State of Texas, et al. v. U.S. Dept. of State, et al.*, No. 6:23-cv-00609-JDK, 21 (E.D. Tex. Apr. 10, 2024); Stephen Farrell, *Logically Enters UK Fact-Checking Partnership with Facebook*, INSIDER MEDIA (Jul. 16, 2021).

<sup>64</sup> Stephen Farrell, *Logically Enters UK Fact-Checking Partnership with Facebook*, INSIDER MEDIA (Jul. 16, 2021).

domestic press plaintiffs' content.<sup>65</sup>

Disinfo Cloud also leveraged Twitter (now X) to promote many of these tools and in several instances, shared product capabilities outside international speech applications. In the cases of promoting NewsGuard and the Global Disinformation Index (GDI), this included the ability to withhold American dollars from businesses sharing disfavored speech.



The Disinfo Cloud website ([www.disinfocloud.com](http://www.disinfocloud.com), which did not use a '.gov' top-level domain, despite being a government-funded platform) is no longer in service as Disinfo Cloud was evidently taken over by a private party independent of the GEC after the Park Advisors award expired.<sup>68</sup> However, a GEC successor called “Defeat Disinfo” was in planning as of October 2022:

Disinfo Cloud is no longer operational belonging to a former implementing partner of DoS, HOWEVER, we are building back better under a USG-owned website to be called Defeat Disinfo, which is to also be FedRamp / ATO-compliant. Estimate timeline for release is in January! If you previously had access to Disinfo Cloud under the same email, then we have you in the list of first-to-get-access to the new website.

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## ii. Tech Demo Series

Disinfo Cloud served as a way to identify potential technology for the GEC's Tech Demo Series, a biweekly forum used to “identify and advocate” for disinformation detection tools to GEC partners.<sup>70</sup> Each Tech Demo agenda began with opening remarks by the GEC, followed by the businesses' opening remarks, a presentation, a question-and-answer session, and ended with time for discussion. Participants of the Tech Demos were encouraged to “sign up [for Disinfo Cloud] to identify and explore technologies under assessment,” thereby

<sup>65</sup> *State of Texas, et. al v. U.S. Dept. of State, et al.*, No. 6:23-cv-00609-JDK, 16 (E.D. Tex. Apr. 10, 2024).

<sup>66</sup> Disinfo Cloud (@disinfocloud) reposting The Global Disinformation Index (@DisinfoIndex) (Twitter (now X) (Jul. 8, 2020, 6:46 AM) available at <https://x.com/disinfoindex/status/1280815562818564096?s=42&t=u8hEK0zejJhIrr8PBhzuqw>.

<sup>67</sup> Disinfo Cloud (@disinfocloud) reposting NewsGuard (@NewsGuardRating), Twitter (now X) (Mar. 30, 2021, 12:39 PM) available at <https://x.com/newsguardrating/status/1376937058216857606?s=42&t=u8hEK0zejJhIrr8PBhzuqw>.

<sup>68</sup> Christina Nemr, *The Disinfo Cloud Digest*, DISINFO CLOUD (Dec. 21, 2021); *AI-Driven Disinformation Intelligence Platform Blackbird.AI Announces Jim Reynolds as VP of Sales to Increase Market Reach and Build Strategic Alliances Globally*, BUSINESS WIRE (Mar. 22, 2022).

<sup>69</sup> Email to USARMY, from Counter Disinformation Technology Advisor, Tech. Engagement Division, Global Engagement Center, U.S. Dep't of State (Oct. 24, 2022) (on file with the Comm.).

<sup>70</sup> TET Slides, GLOBAL ENGAGEMENT CENTER, 11 (date unknown), available at [https://community.apan.org/cfs-file/\\_key/docpreview-s/00-00-17-45-79/2.09-TET-Slides-Unclassified-July-17.pdf](https://community.apan.org/cfs-file/_key/docpreview-s/00-00-17-45-79/2.09-TET-Slides-Unclassified-July-17.pdf).

further promoting the use of the various speech-policing technologies.”<sup>71</sup>

More than 100 technologies participated in the GEC’s Tech Demo Series, including psychological resilience tools, blockchain-based information validation tech, crowdsourced information vetting, and social media monitoring products.<sup>72</sup> Below is a sample of the domestic small businesses of which the Committee is currently aware whose products were featured in the Tech Demo Series and operate to surveil speech or biometric data.<sup>73</sup> The corresponding information is to the best of the Committee’s knowledge and reflects the companies and products at the time they were featured in the Tech Demo and is not a current reflection of any updated product features or entity information (i.e. if the business no longer qualifies as small by SBA standards).

<b>Date of Tech Demo</b>	<b>Company</b>	<b>Product</b>	<b>Product Description</b>
11/20/2019	Factal	Factal	Blends AI technology with a “24/7 newsroom of experienced journalists” to combine social media discovery with “trusted verification” in one platform.
05/19/2021	Quantitative Scientific Solutions, LLC (QS-2)	OpenLine	Applies AI to Open-Source Intelligence of publicly available information in online and social media. Globally monitors subtle and emerging trends, identifies anomalies in discussions, identifies misinformation and disinformation, and identifies their sources. Collects text-based data from a variety of social media sources, including Twitter, Facebook, and Reddit. <sup>74</sup>
06/30/2021	Presage Security, Inc.	eSSESSMENT	Video signal processing software that extracts vital signs, micro-expressions, and other physiological and biometric data and video captured on mobile phones and other consumer-grade video producing devices. Interprets indicators of emotional context, projected and concealed expressions, and physiological responses to stimuli. Processes millions of videos from global, publicly available sources. A previous use case took data from Brown University to predict COVID-19 risk levels on a county level in the U.S. <sup>75</sup>
07/14/2021	Pendulum	Pendulum Intelligence Platform	Tracks, measures, and analyzes narratives, sub-narratives, and underlying content from over 20 sources including social media. <sup>76</sup>
07/28/2021	Protagonist	Protagonist.io Narrative Analytics	Identifies, quantifies, and tracks narratives in media conversations, at scale. Was under contract with DOD/Air Force and DARPA. <sup>77</sup>

<sup>71</sup> Invitation to Tech Demo 4.15 – Protagonist.io (Jul. 27, 2021) (on file with the Comm.).

<sup>72</sup> *Past Events, Events – Technology Engagement Division*, U.S. DEP’T OF STATE (last visited Aug. 1, 2024).

<sup>73</sup> Other Tech Demos featured the following entities and products: Mythos/Carnegie Mellon (Nov. 6, 2019); Mind Over Media (Nov. 20, 2019); KungFu.ai & Data.World (Jun. 24, 2020); Recorded Future (Aug. 22, 2021); LookingGlass (Aug. 24, 2021); Vannevar Labs (May 25, 2022); Compendium Technologies (Jun. 15, 2022); Premise (Jul. 27, 2022); and Adobe/Content Authenticity Initiative (Aug. 13, 2022).

<sup>74</sup> Invitation to Tech Demo 4.10 – QS-2 (May 11, 2021) (on file with the Comm.).

<sup>75</sup> Invitation to Tech Demo 4.13 – Presage (Jun. 23, 2021) (on file with the Comm.).

<sup>76</sup> Tech Demo 4.14 – Pendulum (Jul. 16, 2021) *available at* <https://www.youtube.com/watch?v=IONJz00XDQ0>.

<sup>77</sup> Invitation to Tech Demo 4.15 – Protagonist (Jul. 28, 2021) (on file with the Comm.).

09/22/2021	ViralMoment	ViralMoment	Social listening technology that provides social analytics for images, video, and text. Analyzes memes, GIFs, and videos. Automates narrative research on visual platforms like TikTok, detects and measures viral moments as they are beginning to emerge before they have reached critical mass. <sup>78</sup>
10/20/2021	Voyager Labs	Voyager Analytics and VoyagerCheck	Uses AI to identify the most influential “actors” in any cumulative or newly gathered dataset and delves into connections as well as related and hidden activities and sponsors.

Small businesses whose products were featured but are not domestic included at least the following:

Date of Tech Demo	Company	Product	Product Description
09/08/2021	Geollect	InfoSight	A centralized hub for collecting, processing, and analyzing large volumes of online media and disseminating insights through a dashboard. Integrates datasets from the physical, informational, and cognitive dimensions using geospatial contextualization.
11/3/2021	WeVerify	InVid/WeVerify	Content verification plug-in. Analyzes social media and web content for disinformation, misleading and fabricated content.
11/30/2022	AInfluence	AInfluence	Uses social listening and sentiment analysis to derive insights from which to construct behavior change campaigns that address target issues. Fights disinformation by leveraging local influencers. Attendees included: DOD, DOJ, FBI, DHS, CISA, GSA, USAID, and USAGM.

In sum, the Testbed methodology, the Disinfo Cloud platform, and the Tech Demo Series allowed the GEC and its partners (including private sector companies with domestic speech censorship operations and foreign governments with strict internet speech laws) to source and test surveillance and disinformation detection tools. The GEC marketed and promoted these tools, including by providing Federal funding for some, thereby furthering the CIC.

### iii. International Tech Challenges

The GEC leveraged Park Advisors and Disinfo Cloud resources to host international Tech Challenges to identify and support companies and products addressing disinformation and propaganda. Applicants and awardees were largely small businesses/tech start-ups. Prize money was distributed through subawards from Park Advisors’ FY 2018 grant. Through these challenges, Park Advisors identified over 110 tools and technologies, resulting in eight awardees that used their funding to expand their capabilities in support of the GEC and “other end users, including civil society.”<sup>79</sup>

The U.S.-Taiwan Tech Challenge was held in February 2020 and focused on companies working in the

<sup>78</sup> Invitation to Tech Demo 4.19 – Viral Moment (Sep. 29, 2021) (on file with the Comm.).

<sup>79</sup> Quarterly Performance Report, Park Capital Investment Group LLC, dba Park Advisors (Q4 2021) (on file with the Comm.).

Asia Pacific.<sup>80</sup> It was held in partnership with the American Institute in Taiwan and the Institute for Information Industry. Awards were distributed to two winners: Trend Micro Check (\$175,000) and Cyabra (\$75,000).<sup>81</sup> Cyabra was also featured in the Tech Demo Series on April 29, 2020, and is used to protect against “brand reputation risks, disinformation, and election threats,” and has been retained by companies like Amazon and Disney to scan social media for content that could negatively impact brand image.”<sup>82</sup>

The U.S.-Africa Tech Challenge took place in April-May 2021 and sought to address COVID-19 vaccine hesitancy and disinformation. Among the collaborators were Twitter, USAID, the EU, Ushahidi, Informa, and the Intergovernmental Authority on Development.<sup>83</sup> The three winners were Sea Monster (\$100,000), Affluence (\$100,000), and Congo Check (\$50,000). The awardees implemented two “digital engagement and behavior change” campaigns with the primary goal of “increasing positive sentiment towards COVID-19 vaccines” and to “drive uptake” of the vaccines.<sup>84</sup> The campaigns aimed to increase awareness of vaccine disinformation and disseminate information through community-based influencers and civil society.<sup>85</sup> The GEC’s takeaway from this challenge was that they could leverage influencers to drive behavior campaigns regarding sentiment to the COVID-19 vaccine.<sup>86</sup>

An applicant for this challenge, Code for Africa and its subsidiary CivicSignal, submitted its TrustList product for consideration. TrustList was built with the GDI (discussed in the next section), using the GDI’s methodology.<sup>87</sup> The application stated that Code for Africa/CivicSignal was targeting disinformation in Africa because “Russia is seeding disinformation amongst African audiences as a backdoor to influence African Americans and other constituencies in the U.S.”<sup>88</sup> This boomerang method of targeting foreign speech because it impacts Americans is prohibited by the GEC’s international mandate. While Code for Africa/TrustList did not win the U.S.-Africa Tech Challenge, they have received multiple GEC awards, and likely did not change the reasoning for its operations between awards applications.<sup>89</sup>

The U.S.-Paris Tech Challenge was held in June and September of 2021 and was organized in collaboration with the U.S. Embassy in Paris, the Atlantic Council’s DFRLab, the Cybersecurity and Infrastructure Security Agency (CISA) within DHS, the North Atlantic Treaty Organization (NATO), the U.K. Department for Digital, Culture, Media and Sport, the Office of the Tech Ambassador of Denmark, and the Digital Communication Network.<sup>90</sup>

The three winners of the U.S.-Paris Tech Challenge were: InVid/WeVerify (\$100,000), the Institute for Strategic Dialogue (\$50,000), and the GDI (\$100,000). The InVid/WeVerify and GDI subawards were both used for product development, while the Institute for Strategic Dialogue subaward was used to detect suspected state-manipulation of Wikipedia, including by interviewing members of the Wikipedia community.<sup>91</sup>

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<sup>80</sup> *U.S.-Taiwan Tech Challenge*, DISINFO CLOUD (Jun. 21, 2022) available at [https://web.archive.org/web/20220621011352mp\\_/https://disinfocloud.com/taiwan-tech-challenge](https://web.archive.org/web/20220621011352mp_/https://disinfocloud.com/taiwan-tech-challenge).

<sup>81</sup> *About Us*, TECH. ENGAGEMENT TEAM, U.S. DEPT. OF STATE ARCHIVE (last visited Jul. 20, 2024).

<sup>82</sup> *About Us*, CYABRA (last visited Jul. 30, 2024).

<sup>83</sup> *U.S.-Africa Tech Challenge*, DISINFO CLOUD (Oct. 25, 2021) available at [https://web.archive.org/web/20211025133937mp\\_/https://disinfocloud.com/africa-tech-challenge](https://web.archive.org/web/20211025133937mp_/https://disinfocloud.com/africa-tech-challenge).

<sup>84</sup> *Report: Global Engagement Center on RT and Sputnik’s Role in Russia’s Disinformation and Propaganda Ecosystem*, Global Engagement Center (2021); End of Year Accomplishments for CY21, Tech Challenges (on file with the Comm.).

<sup>85</sup> *Report: Global Engagement Center on RT and Sputnik’s Role in Russia’s Disinformation and Propaganda Ecosystem*, Global Engagement Center (2021) (on file with the Comm.).

<sup>86</sup> Quarterly Performance Report, Park Capital Investment Group LLC, dba Park Advisors (Q4 2021) (on file with the Comm.).

<sup>87</sup> Proposal, TrustList @ CivicSignal, Code for Africa (Feb. 28, 2021) (on file with the Comm.).

<sup>88</sup> *Id.*

<sup>89</sup> State production to H. Comm. on Small Bus. (Dec. 3, 2023); State production to H. Comm. on Small Bus. (Mar. 28, 2024); On file with the Comm.; *Call for applications for newsrooms to help strengthen their Check Desks*, CODE FOR AFRICA (Jan. 26, 2024) available at <https://opportunities.codeforafrica.org/2024/01/26/call-for-applications-for-newsrooms-to-help-strengthen-their-checkdesks/>.

<sup>90</sup> Paperwork Brief Vol. 2, Ed. 5, Technology Engagement Team, Global Engagement Center, U.S. Dep’t of State (Sep. 3, 2021); End of the Year Accomplishments for CY21, Tech Challenges (on file with the Comm.).

<sup>91</sup> End of the Year Accomplishments for CY21, Tech Challenges (on file with the Comm.).

The winners of the U.S.-Paris Tech Challenge were promoted in GEC newsletters and in meetings with the private sector, including during an October 2021 meeting with YouTube/Google.<sup>92</sup>

## **B. Global Disinformation Index**

The GDI received at least four Federally funded awards; one directly from the U.S. government through the U.S.-Paris Tech Challenge, and three from the NED (which was created by Congress and is largely funded by Congressional appropriations from State), totaling nearly \$1 million.<sup>93</sup> The GDI is indirectly supported by the Federal government through continued funding Code for Africa/CivicSignal.

As summarized in its 2020 application for NED funding, the GDI aims “to disrupt, defund and down-rank disinformation sites, and [the GDI] work[s] collectively with governments, business and civil society to achieve it.”<sup>94</sup>

### **i. About the GDI**

The GDI was founded in late 2018 as a U.K. and U.S. based non-profit organization.<sup>95</sup> While the original U.S. 501(c)(3) organization, the AN Foundation, is now defunct, the GDI currently operates through three small legal entities:

- a. Disinformation Index Ltd.: a U.K. private company limited by guarantee;
- b. Disinformation Index, Inc.: a U.S. 501(c)(3); and
- c. Global Disinformation Index gUG: a nonprofit entrepreneurial company in Germany, analogous to a limited liability corporation for nonprofit purposes.<sup>96</sup>

By leveraging partnerships within the advertising industry, the GDI operates to stop the spread of what it considers to be disinformation by choking off revenue from news and information outlets that have the highest determined ‘risk’ of spreading said disinformation. This also impacts the business’ reach and reputation. If these businesses are not able to earn revenue, and their reputations are significantly tarnished, business operations will suffer, their reach and ability to produce content ultimately diminished. Some outlets targeted by the GDI report earning just two to six percent of the ad revenue expected for outlets with comparable audience sizes as a result.<sup>97</sup>

The GDI believes that a main reason for the spread of disinformation is that information/news websites, particularly those that are low-quality, low-traffic, and quickly constructed, write about certain narratives to drive traffic to their business; less so that the authors believe those positions or that they are worthy of discussion.<sup>98</sup> The GDI estimates the online advertising industry amounts to \$385 billion globally, with nearly \$250 million in online ad revenue earned by ‘disinformation sites’ each year.<sup>99</sup> By removing this financial incentive, the GDI believes it will stop outlets from sharing this information and conform to the GDI’s preferred narratives in order to get better ratings—harming the viability of businesses that do not.

This curtails speech the GDI does not agree with, because it is not just false information that the GDI labels as disinformation. Outlets are scored using subjective application of arbitrary criteria, and outlets expressing

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<sup>92</sup> Internal notes from meeting with Google, Global Engagement Center (Oct. 15, 2021) (on file with the Comm.).

<sup>93</sup> The second GDI NED award is a cost (and possibly time) extension of the initial award.

<sup>94</sup> Application Documents – Proposal Narrative, National Endowment for Democracy Grant 2020-10474 (2020-1116), Global Disinformation Index, 9 (2020) (on file with the Comm.).

<sup>95</sup> *Id.*

<sup>96</sup> *About*, GLOBAL DISINFORMATION INDEX (last visited Jul 20, 2024).

<sup>97</sup> Freddie Sayers, *Inside the disinformation industry: A government-sponsored agency is censoring journalism*, UNHERD (Apr. 17, 2024).

<sup>98</sup> *Cutting the Funding of Disinformation: The Ad-Tech Solution*, GLOBAL DISINFORMATION INDEX (May 1, 2019).

<sup>99</sup> *Id.*

speech that does not align with those subjective determinations are subject to the GDI's interference.

When the GDI was established, it defined 'disinformation' as "deliberately false content, designed to deceive."<sup>100</sup> This is analogous to traditional definitions. However, by 2021, the GDI had expanded its definition of 'disinformation' to mean: "adversarial narratives, which are intentionally misleading; financially or ideologically motivated; and/or, aimed at fostering long-term social, political or economic conflict; and which create a risk of harm by undermining trust in science or targeting at-risk individuals or institutions."<sup>101</sup>

The GDI's definition of "institutions" includes "the current scientific or medical consensus." It is vital not only for the sake of innovation to be able to challenge the current consensus, but also for the ability to resolve complex issues through public discourse. This problem is demonstrated by the GDI's position on media outlets giving credence to the COVID-19 lab-leak theory: "[c]utting off ads to these fringe sites and their outer networks is the first action needed."<sup>102</sup> This theory on COVID-19 origins is now widely accepted as credible, including as the "most likely" cause by multiple Federal agencies, yet the GDI had labeled it as disinformation and attacked the credibility and earning capacity of news and media businesses discussing it.<sup>103</sup>

The GDI justified the expansion of the 'disinformation' definition by saying it allowed their analysis to include speech that is "harmful" or "divisive."<sup>104</sup> These determinations are subjective and it is clear from the GDI's output that it is through a partisan lens. Much of the speech the GDI labels as disinformation under this definition reflects conservative viewpoints. For example, as the GDI considers speech questioning the efficacy and safety of the COVID-19 vaccines and opposition to illegal immigration to be adversarial narratives, media outlets discussing related stances are therefore labeled as purveyors of disinformation under the GDI's definition.<sup>105</sup> This is not restricted to speech expressing these narratives, but includes the framing of the position; if an outlet uses the term 'illegal alien' rather than 'undocumented immigrant' (or the then-current subjectively designated as politically correct terminology), the GDI will label it as disinformation (under the claim that it creates a risk of harm by targeting at-risk individuals).<sup>106</sup>

This demonstrates the central flaw with press-rating organizations, and why they cannot receive Federal funding or support; speech credibility assessments are subject to the biases of the assessor. It is impossible to rate the credibility of press objectively using subjective metrics such as whether language is "sensational," but also when partisan ideologies are touted as fact. There is always a partisan tilt that manifests when labeling certain outlets as more trustworthy than others.

The GDI's politicized interpretation of fact is further evidenced by labeling media outlets asserting biological differences between men and women, namely, that men cannot become women, as a reason to assign a poor rating and interrupt their funding. This is demonstrated in its communication with British outlet *UnHerd* about its rating:

*"Our team re-reviewed the domain, the rating will not change as it continues to have anti-LGBTQI+ narratives... The site authors have been called out for being anti-trans. Kathleen Stock is acknowledged as a 'prominent gender-critical' feminist."*<sup>107</sup>

<sup>100</sup> GLOBAL DISINFORMATION INDEX, WEB ARCHIVE (Jul. 1, 2019) <https://web.archive.org/web/20190701204010/https://disinformationindex.org/>.

<sup>101</sup> *Brief: Disinformation Risk in the United States Online Media Market*, GLOBAL DISINFORMATION INDEX (Oct. 21, 2022).

<sup>102</sup> *Evolution of the Wuhan Lab Conspiracy: The Ad-funded Sites Spreading It*, GLOBAL DISINFORMATION INDEX (Apr. 24, 2020).

<sup>103</sup> The FBI and the Department of Energy found that the COVID-19 lab leak theory on origins is most likely correct; Anumita Kaur & Dan Diamond, *FBI Director Says Covid-19 "Most Likely" Originated From Lab Incident*, THE WASH. POST (Feb. 28, 2023); see also Jeremy Herb & Natasha Bertrand, *US Energy Department Assesses Covid-19 Likely Resulted From Lab Leak, Furthering US Intel Divide Over Virus Origin*, CNN (Feb. 27, 2023).

<sup>104</sup> Clare Melford, *Bankrolling Bigotry*, London School of Economics IDEAS Online Event, YOUTUBE (Nov. 10, 2021).

<sup>105</sup> Phase II Application, U.S.-Paris Tech Challenge, Global Disinformation Index (2021) (on file with the Comm.).

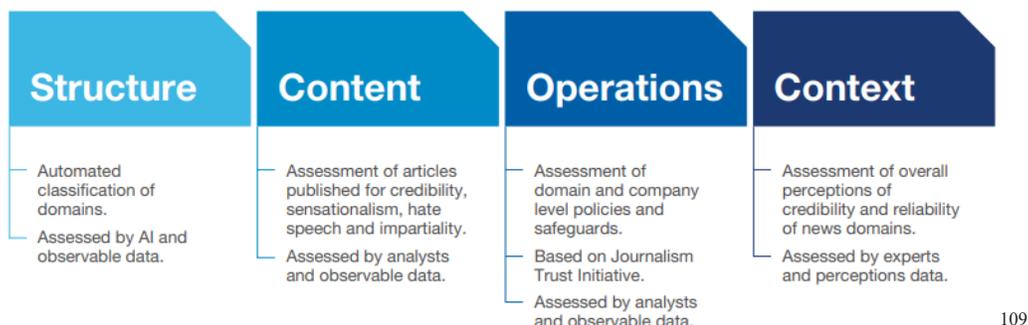
<sup>106</sup> *Disinformation as Adversarial Narrative Conflict*, GLOBAL DISINFORMATION INDEX (Jun. 22, 2022).

<sup>107</sup> Freddie Sayers, *Inside the disinformation industry: A government-sponsored agency is censoring journalism*, UNHERD (Apr. 17, 2024).

In this case, the GDI is using a hyper-progressive lens to portray whether an outlet can be trusted based on whether they adhere to the GDI’s version of truth. Businesses refuting that truth are hurt financially and reputationally. *UnHerd* provides a breakdown of the reality of the GDI’s impacts: *UnHerd’s* ad agency uses the Grapeshot platform to automatically select websites on which to place ads. Grapeshot uses the GDI to inform “brand safety;” if the GDI assigns a low score to a media outlet, very few ads will be placed.<sup>108</sup>

**ii. Products**

The GDI’s partisan determinations of MDM are factored into its methodology, which includes manual and automated ratings of news domains/media outlets by level of risk. The underlying assessment framework is composed of the “expert-identified disinformation flags” spread across four pillars:



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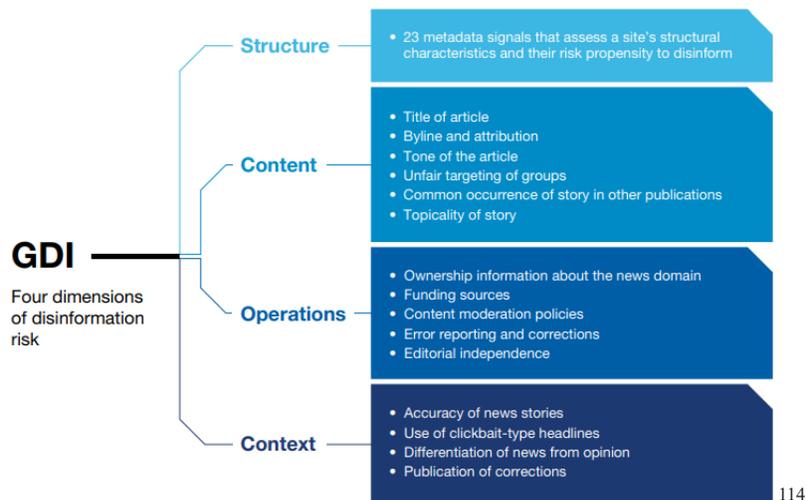
Based on the aggregate score across the four pillars, each news domain is assigned a risk-level for disinformation: low, medium-low, medium, medium-high, or high. The scoring scale for the index ranges from zero (maximum risk of disinformation) to 100 (minimum risk of disinformation). A domain’s score is the mean of the points earned across all four of the pillars.<sup>110</sup>

TOTAL DOMAIN SCORE	DISINFORMATION RISK LEVEL	DISINFORMATION RISK CATEGORY
< -1 SD from mean	5	Maximum risk
≥ -1 and < - 0.5 SD from mean	4	High risk
≥ -0.5 and ≤ 0.5 SD from mean	3	Medium risk
> 0.5 and ≤ 1SD from mean	2	Low risk
> 1 SD from mean	1	Minimum risk

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The rating system supposedly does not assess whether a specific news outlet is actually purveying disinformation, but instead assesses the risk of its exposure to disinformation. The GDI says that this “differentiation is critical,” but it is not clear what that differentiation actually is, as the GDI’s communications with news outlets and its own reports reveal specific narratives the GDI uses to justify its ratings.<sup>112</sup> The GDI also claims it “does not determine which news stories are inaccurate, or whether a site should be labelled as a disinformation domain. The index should not be used in this way or to judge what is true news.”<sup>113</sup> As demonstrated in the very same report in which that quote appears, which lists “accuracy of news stories” as a metric, this claim is not accurate.

<sup>108</sup> *Id.*  
<sup>109</sup> *Rating Disinformation Risk: The GDI Methodology*, GLOBAL DISINFORMATION INDEX, 6 (Dec. 2019).  
<sup>110</sup> *Id.* at 11.  
<sup>111</sup> *Id.* at 12.  
<sup>112</sup> *Id.* at 5; Freddie Sayers, *Inside the disinformation industry: A government-sponsored agency is censoring journalism*, UNHERD (Apr. 17, 2024); *Evolution of the Wuhan Lab Conspiracy: The Ad-funded Sites Spreading It*, GLOBAL DISINFORMATION INDEX (Apr. 24, 2020).  
<sup>113</sup> *Rating Disinformation Risk: The GDI Methodology*, GLOBAL DISINFORMATION INDEX, 5 (Dec. 2019).



## a. Reports

The GDI issues periodic reports including “Disinformation Risk Assessments” on media in various global regions. One such report on American media outlets was prefaced by a press release on October 21, 2022.<sup>115</sup> The accompanying report was issued on December 16, 2022, ranking dozens of American news media businesses by the GDI’s determination of “trustworthiness” and “risk.”<sup>116</sup> Every business the GDI labeled in the top ten “riskiest” outlets publish content that demonstrates conservative-leaning or libertarian points of view. Every single one of the supposedly most trustworthy media organizations consistently touts left-leaning narratives.

Least risky sites	Riskiest sites
NPR	New York Post
AP News	Reason Magazine
The New York Times	RealClearPolitics
ProPublica	The Daily Wire
Insider	TheBlaze
USA Today	One America News Network
The Washington Post	The American Conservative
BuzzFeed News	The Federalist
Wall Street Journal	Newsmax
HuffPost	The American Spectator

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In justifying these results, the GDI assigns qualities it deems each media outlet to possess, which furthers the evidence of GDI’s partisan bias in its methodology. One such quality is whether the outlet uses “sensational language,” which turns on the assessor’s definition of that term. *The Federalist*, for instance, receives a maximum risk level with the lowest Content pillar scores in the GDI’s study for this reason.<sup>118</sup> In contrast, *The Washington Post* was assigned a low risk level as it “largely avoids sensational [...] reporting.” It is clear from looking at recent headlines from opinion pieces such as “*Yes, It’s okay to compare Trump to Hitler. Don’t let me stop you*” and “*Can*

<sup>114</sup> *Id.* at 7.

<sup>115</sup> *Brief: Disinformation Risk in the United States Online Media Market*, GLOBAL DISINFORMATION INDEX (Oct. 21, 2022).

<sup>116</sup> *Disinformation Risk Assessment: The Online News Market in the United States*, GLOBAL DISINFORMATION INDEX (Dec. 16, 2022).

<sup>117</sup> *Brief: Disinformation Risk in the United States Online Media Market*, GLOBAL DISINFORMATION INDEX (Oct. 21, 2022).

<sup>118</sup> *Id.*

anyone stop the coming Trump dictatorship?” that *The Washington Post* does not shy from sensationalism.<sup>119</sup> Similarly, *HuffPost* (formerly *Huffington Post*), which was awarded a low risk level for its “unbiased content free from sensational text or visuals,” recently posted an article with this headline: “*Supreme Court Gives Joe Biden The Legal OK To Assassinate Donald Trump.*” This is a common theme for both outlets historically, but they generally align with the GDI’s political positions, so that discrepancy seems to have been overlooked.

The evidence of the GDI’s bias is furthered in its application of other metrics, such as whether an outlet engages in “negative targeting” and “best journalistic practices.” For example, the GDI justified (*Business Insider*)’s low risk rating by saying its content “was largely free of bias, negative targeting or sensationalism, and the articles used journalistic best practices.”<sup>120</sup> However, *Insider* has been subject to frequent criticism for exclusion of mitigating evidence in its reporting, inaccurate smear campaigns, and contacting subjects of said campaigns just before publishing without a reasonable timeframe to refute *Insider*’s claims.

There are two recent examples of *Insider*’s targeting and lack of journalistic integrity. The first consisted of two articles accusing the owner of Barstool Sports of criminal behavior while omitting mitigating evidence. *Insider* contacted companies that advertised with Barstool in a clear attempt to get them to sever business relationships.<sup>121</sup> The second recent example is *Insider*’s coverage of Bill Ackman’s wife. Ackman had, days before, garnered national media attention for criticism of Harvard University’s then-president. In this case, *Insider* provided the subject with hours to respond before publishing.<sup>122</sup> This led *Insider*’s parent company to perform a review of *Insider*’s work.

Other qualities in GDI’s ratings which are clearly applied subjectively include “lack of bias” and whether an outlet’s reporting is “neutral.” This can be seen in the GDI’s minimum risk rating of *NPR*, which the GDI said demonstrated “some small degree of bias” but “neutral, fact-based content.”<sup>123</sup> Compare this to the recent exposé on *NPR* that was written by a staff member who had been with the institution for 25 years. According to the exposé, when stories *NPR* labeled as disinformation turned out to be credible, *NPR* reportedly “pretended it never happened” and performed “no self-reflection.”<sup>124</sup> The staff member cited specific examples, such as former President Trump’s supposed Russia collusion, as disproven by the *Mueller* report, the legitimacy of Hunter Biden’s laptop, and the COVID-19 lab leak theory.<sup>125</sup> The author went on to say there was “no viewpoint diversity” within *NPR*’s staff, and that “an open-minded spirit no longer exists within *NPR*.” Shortly after the exposé was published, the author was suspended without pay, then subsequently resigned, stating “I cannot work in a newsroom where I am disparaged by a new CEO whose divisive views confirm the very problems at *NPR* I cite in my [...] essay.”<sup>126</sup> The referenced new CEO once called the First Amendment a “challenge” and stated that “[o]ur reverence for the truth might be a distraction getting in the way of finding common ground and getting things done.”<sup>127</sup>

The *New York Times* (NYT) earned its exceptional rating “in large part based on a high degree of transparency all around.”<sup>128</sup> It is of note that a defector from the *NYT*, who wrote a book about her experiences there, said in a recent interview that the *NYT*’s ‘disinformation consultants’ working with its in-house disinformation department

<sup>119</sup> Mike Goodwin, *Yes, it’s okay to compare Trump to Hitler. Don’t let me stop you.*, THE WASH. POST (Dec. 20, 2023); Robert Kagan, *Can anyone stop the coming Trump dictatorship*, THE WASH. POST (Dec. 26, 2023).

<sup>120</sup> *Disinformation Risk Assessment: The Online News Market in the United States*, GLOBAL DISINFORMATION INDEX (Dec. 16, 2022).

<sup>121</sup> Dave Portnoy (@stoolpresidente), Twitter (now X) (Nov. 4, 2021, 11:56 PM) available at <https://x.com/stoolpresidente/status/1456304390566993922>; Dave Portnoy (@stoolpresidente), Twitter (now X) (Nov. 6, 2021, 9:12 AM) available at <https://x.com/stoolpresidente/status/1456972693178355723?s=10&t=u8hEK0zejJhItrj8PBhzquw>.

<sup>122</sup> Neri Oxman (@NeriOxman), Twitter (now X) (Jan. 4, 2024, 2:35 PM), available at <https://twitter.com/NeriOxman/status/1742993073078947843?lang=en>.

<sup>123</sup> *Disinformation Risk Assessment: The Online News Market in the United States*, GLOBAL DISINFORMATION INDEX (Dec. 16, 2022).

<sup>124</sup> *Id.*

<sup>125</sup> Uri Berliner, *I’ve Been at NPR for 25 Years. Here’s How We Lost America’s Trust*, THE FREE PRESS (Apr. 9, 2024).

<sup>126</sup> Emily DeLetter, *NPR editor Uri Berliner resigns after essay accusing outlet of liberal bias*, USA TODAY (Apr. 17, 2024).

<sup>127</sup> Lindsay Kornick, *NPR boss once called the First Amendment a ‘challenge’ and ‘reverence for the truth’ a distraction*, FOX NEWS (Apr. 17, 2024).

<sup>128</sup> *Disinformation Risk Assessment: The Online News Market in the United States*, GLOBAL DISINFORMATION INDEX, 19 (Dec. 16, 2022).

consider pro-life views to be disinformation, rather than a political ideology they disagree with.<sup>129</sup> This politicized categorization is not disclosed elsewhere known to this Committee and therefore does not suggest “a high degree of transparency all around.”

These points are made not to belittle the outlets at issue, but to demonstrate that the GDI purports certain news media organizations that align with its demonstrated political positions as the epitome of journalistic integrity and unbiased credibility, and those that do not align as “risky” and “untrustworthy.” Subjective metrics easily impacted by bias are used to reach these determinations. Outlets that do not adhere to the GDI’s views are subject to reputational and economic harms unless they revise their content in accordance with the GDI’s wishes. Even if the bias was less egregious, some degree of subjectivity will always exist when rating trustworthiness or credibility. That is the central, unavoidable flaw, and why the Federal government cannot support organizations that rate the press, especially those which aim to demonetize certain businesses based on their speech. It is an abridgement of their First Amendment protections.

During the House Foreign Affairs Subcommittee on Oversight and Accountability (HFAC) hearing on March 21, 2024 (notably held regarding State’s lack of responsiveness in HFAC’s investigations), State argued that the GEC’s GDI funding was awarded before the GDI issued its report ranking American media outlets by risk, implying that the GEC was not aware of the GDI’s work concerning domestic media. However, as the GDI’s U.S.-Paris Tech Climate application states several times that the entirety of its work up until that point was focused on English-speaking North America, the GEC was aware of the GDI’s impact on American businesses. In fact, one of the judging criteria used during the Tech Challenges was the business’ “track record” and “substantive experience.”<sup>130</sup> The GEC understood the nature of the GDI’s work and gave them taxpayer dollars to expand their capabilities anyway.

## **b. Dynamic Exclusion List**

The GDI’s “core output,” its Dynamic Exclusion List (DEL), is a continually updated list of news and media businesses that the GDI purports to publish adversarial narratives/disinformation. Launched in May 2020, the DEL is a licensable tool used by the GDI’s commercial partners to “block monetization services” (cut off ad spend) from featured businesses.<sup>131</sup> If an outlet is on the DEL, that domain is blocked from users’ online ad bidding systems, resulting in diverting their clients’ ad spend away from content the GDI disapproves of. This is essentially a blacklist.

As the DEL is proprietary, this Committee does not have significant insight into which outlets are on the DEL other than those discussed in GDI’s reports. The DEL is discussed in each of the GDI’s Federal funding applications and was therefore acceptable to the GEC and the NED.

The GDI has been successful in leveraging the DEL to accomplish its goal of defunding disfavored businesses; the GDI estimates that between launch and 2022, sites on the DEL have lost \$128 million in annual revenue.<sup>132</sup> As previously stated, impacted press report earning only two to six percent of the advertising revenue expected for outlets with comparable audience sizes after being added to the DEL.<sup>133</sup>

The GEC promoted what appears to be the DEL in a May 2021 meeting with Zoom Video Communications, Inc. (Zoom). The notes from that meeting reflect several points of note:

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<sup>129</sup> Nellie Bowles, *The Corruption of the American Newsroom*, UNHERD (Jun. 5, 2024, at 2:20); Nellie Bowles, *Morning After the Revolution: Dispatches from the Wring Side of History*, Penguin Random House (May 14, 2024).

<sup>130</sup> Judging Packet, U.S.-Paris Tech Challenge, Global Engagement Center (Sep. 29-20, 2021) (on file with the Comm.).

<sup>131</sup> Phase II Application, U.S.-Paris Tech Challenge, Global Disinformation Index (2021) (on file with the Comm.).

<sup>132</sup> Application Documents – Proposal Narrative, National Endowment for Democracy Grant 2022-1181, Global Disinformation Index, 1 (2022) (on file with the Comm.).

<sup>133</sup> Freddie Sayers, *Inside the disinformation industry: A government-sponsored agency is censoring journalism*, UNHERD (Apr. 17, 2024).

1. Zoom staff asked about “lists” that could be shared around “malign actors,” to which the GEC recommended the GDI and the Hamilton 2.0 dashboard.
2. The GEC promoted its Testbed project, sharing insights into tests with bit.ly across Twitter and Telegram, and also the potential to utilize synthetic detection technologies to identify synthetic text in Zoom’s chat function and/or synthetic photos in Zoom avatars or background uploads.
3. The GEC invited Zoom to use its Disinfo Cloud platform to learn more about the disinformation detection technologies the GEC was working with.<sup>134</sup>

### c. Veracity.ai

Veracity.ai is the GDI’s software-as-a-service (SaaS) product that won Federal funding through the U.S.-Paris Tech Challenge.<sup>135</sup> It was prototyped in 2017 using a grant from the Knight Foundation, then was scaled up with grants from the U.K. Foreign and Development Office (U.K. FDCO) and the Omidyar Network.<sup>136</sup> It is an AI-driven disinformation risk detection platform that measures disinformation risk across the internet and blocks monetization from outlets it labels as purveyors of disinformation. Data is combined with machine learning and human review to identify websites spreading disinformation, which are then added to the DEL.

In its application for the U.S.-Paris Tech Challenge, the GDI stated that end goal of Veracity.ai was to block monetization from outlets the product determined to be purveyors of disinformation.<sup>137</sup> At the time of application to the Tech Challenge, Veracity.ai covered over 300,000 internet domains and millions of pieces of content on a weekly basis.<sup>138</sup>

**About the solution:** [\[Full proposal here\]](#) [\[full video here\]](#) [\[90 second video here\]](#)

Veracity.ai measures disinformation risk across the open web. The tool captures hundreds of thousands of pieces of content daily, combining data with machine learning and human review to identify websites propagating disinformation. Identified websites are added to GDI’s Dynamic Exclusion List database, which commercial partners use to block monetization services on those websites.

**Disinformation context being addressed:**

GDI’s solution blocks advertising-based revenue streams related to disinformation, thereby disrupting financial incentives for disinformation. By addressing the financial motivations behind disinformation, GDI aims to substantially stem the flow of online disinformation. Veracity.ai can also help inform investigations into and research on specific disinformation operations and networks, helping further limit the proliferation of false information online.

**Comments and suggested questions to explore during Q&A:**

1. This is a key CPD approach that aims to block the monetization of and remove financial incentives for disinformation campaigns. How do they measure their impact?
2. Currently, the tool primarily supports English language content but GDI is working on expanding capabilities into five additional languages. How does GDI decide which new language capabilities to prioritize?
3. How does GDI get adtech buy-in and motivate private sector engagement to block monetization services on flagged websites?

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<sup>134</sup> Internal notes from meeting with Zoom Video Communications, Inc., Global Engagement Center (May 27, 2021) (on file with the Comm.) during this meeting, Zoom communicated that while it did not proactively scan their meetings around the world, or meeting titles (as an example) for keywords, they may do so in the future.

<sup>135</sup> Phase II Application, U.S.-Paris Tech Challenge, Global Disinformation Index (2021) (on file with the Comm.).

<sup>136</sup> *Id.*

<sup>137</sup> *Id.*

<sup>138</sup> *Id.*

<sup>139</sup> *Id.*

### iii. Funding

The GDI earns revenue from government awards, donations from philanthropic organizations, and license fees for its DEL and Veracity.ai products.<sup>140</sup> The GDI has received U.S. taxpayer dollars from at least two sources: the GEC (through a subaward from Park Advisors for winning the U.S.-Paris Tech Challenge) and the NED. The GDI's work was concentrated in North America at the time of application to both entities, which both the GEC and the NED were aware of. The GDI leveraged the GEC and NED funding to develop its infrastructure and expand its work beyond the English language and North America, seemingly in-line with both organizations' strict international mandates, yet this only spread the GDI's perception of rated businesses to other audiences and allowed it to grow its capabilities.

The GDI says the following in its initial NED application, ignoring that they *are* “the unscrupulous companies [governments] hire”:

Disinformation's techniques and networks have been democratized and decentralized: they are open to any regular person or actor. This includes authoritarian governments that have turned to disinformation as a way to censor and marginalize opposition voices and groups. The result is that disinformation campaigns can be quickly mobilized against different social groups in a country: to disenfranchise them around elections, to stigmatize them during key policy decisions, and to censor and marginalize them as equal members in a society with equal voices. Technology has been turned on the groups that should be the beneficiaries of it. Too often, authoritarian governments (and/or the unscrupulous companies they hire) are behind it.

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They continue with more ironic truths: “[g]overnments are increasingly advancing measures which threaten the very vitality of an independent and trusted media that they aim to protect.”<sup>142</sup>

#### a. GEC Funding

The GDI submitted its application for the U.S.-Paris Tech Challenge through its British entity, Disinformation Index, Ltd. At the time of application, the GDI had already received funding from the U.K. government and U.S. foundations, with licensing revenues accounting for about 18 percent of its total income.<sup>143</sup> It had partnered with a dozen ad tech companies by that time and was redirecting millions of dollars of ad spend.<sup>144</sup> It boasted that over the previous year, it had cut the number of ad auctions to sites they labeled as disinformation in half.<sup>145</sup> The application notes that at the time of submission, Veracity.ai supported mainly English-language content out of North America, so the financial impact referred to was mostly felt by English-speaking North American businesses.<sup>146</sup>

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<sup>140</sup> *About*, GLOBAL DISINFORMATION INDEX (last visited Jul. 20, 2024).

<sup>141</sup> Application Documents – Proposal Narrative, National Endowment for Democracy Grant 2020-10474 (2020-1116), Global Disinformation Index, 1 (2020) (on file with the Comm.).

<sup>142</sup> Application Documents – Proposal Narrative, National Endowment for Democracy Grant 2020-10474 (2020-1116), Global Disinformation Index, 2 (2020) (on file with the Comm.).

<sup>143</sup> Phase II Application, U.S.-Paris Tech Challenge, Global Disinformation Index (2021) (on file with the Comm.).

<sup>144</sup> *Id.*

<sup>145</sup> *Id.*

<sup>146</sup> *Id.*

## OVERVIEW OF TECHNOLOGY

**Company name:** Disinformation Index Ltd d/b/a GDI (a nonprofit company limited by guarantee, incorporated in England & Wales)

**Technology name:** Veracity.ai

**Brief overview of proposed tool/technology solution (no more than 250 words)**

Veracity.ai is GDI's data platform for measuring disinformation risk across the open web. Veracity captures 500k+ pieces of content each day from 300k+ websites, with thousands more added each week, using a combination of machine learning and human review to identify disinformation. This data is used to by researchers, policymakers, and GDI's commercial partners to block monetization.

GDI views disinformation through the lens of adversarial narrative conflict. Anywhere someone intentionally conveys a misleading narrative, either implicitly or explicitly, and often using a combination of cherry-picked facts and fabrication, that is adversarial in nature against an at-risk group or institution and creates a risk of harm, they are disinforming.

Veracity.ai incorporates machine learning models trained to dozens of adversarial narrative topics, from anti-vaccine conspiracy to anti-immigrant content. It then measures the proportion of each site's content that relates to one or more of these topics and, after overlaying a human-powered review, distills out the "worst offenders" from across the web. These sites are then used to provide researchers with a definitive corpus of open web disinformation. They also comprise GDI's Dynamic Exclusion List, which our commercial partners use to block monetization services.

To date, Veracity has supported mainly English-language content. Our goal for 2021 is to apply further machine learning techniques to rapidly expand to five other European languages -- Spanish, French, German, Italian, and Portuguese -- in order to better serve our research, policy, and commercial constituencies. Further languages are planned for 2022 and beyond.

**How would you describe your tool/technology in a tweet (i no more than 280 characters)**

International, comprehensive, trusted identification of open web disinformation risk at scale, from a global independent, neutral not-for-profit.

**In which category does your technology fit?**

Adtech tools.

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<sup>147</sup> *Id.*

### How does your system help to solve the problems of propaganda and disinformation?

Today's scourge of online disinformation is the toxic byproduct of the dominant advertising-based business models that power the modern internet. The technology companies most central to the internet make money by monetizing the attention of individual users - they employ private data collection, deep learning, and recommender systems to present user-generated content to users that they calculate will maximize their engagement and thus time on their platform. This allows them to capture more of their attention and monetize it through paid advertising, resulting in some of the most financially lucrative businesses in history.

Modern disinformation actors understand this business model and know how to "game the algorithm" in order to gain audience and exploit their attention. Most people who create and disseminate online disinformation do so purely out of financial motivation, and even ideologically motivated actors are still quite generously rewarded from a financial perspective when disseminating adversarial content that drives engagement. Thus, by disrupting these financial incentives, we can substantially stem the flow of online disinformation.

GDI's technology does just that. By providing a transparent, independent, and neutral source of disinformation risk measurement across the open web and around the world, GDI provides tech platforms with the data they need to demonetize disinformation. And it's working -- since March of 2020, GDI has halved the volume of ad auctions occurring on the "worst offender" sites we track, and we are now partnered with a dozen technology and advertising platforms that use our data to keep their inventory free of disinformation.

But we still have a long way to go. Right now, Veracity.ai is primarily focused on English-language content, mostly produced out of North America. In order for us to reach our full impact potential, we must expand to the rest of the globe.

### How was your system conceived and what was your original goal?

GDI was founded out of parallel efforts in the US and UK in recognition of the tech industry's need for neutral, independent disinformation risk ratings of open web content. It was clear following, for example, the Brexit referendum and the 2016 US presidential election that the desire and ability of tech platforms to make consistent, independent determinations of disinformation risk was severely limited. For obvious reasons, it was not an appropriate role for governments, either. Therefore, with advising from esteemed voices such as Anne Applebaum and Peter Pomerantsev, our co-Founders Clare Melford in London and Dr. Daniel Rogers in New York teamed up and formed the Global Disinformation Index.

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The GDI reportedly used the GEC funding to "accelerate its scale up."<sup>149</sup> By growing the GDI, the GEC enabled the GDI to further its work on U.S. media outlets, demonstrated by the fact that the GDI published its report ranking U.S. media outlets after it received the GEC funding.

The GEC also promoted the GDI through the Disinfo Cloud Twitter account and directly to the private sector in the TET's communications with technology companies, including Zoom and Google/YouTube. It is therefore not only the Federal funding that is at issue, but also promotion and validation with the weight of the U.S. State Department behind it.

## b. NED Funding

The NED awarded a total of \$756,923 to the GDI's two U.S. nonprofit entities: \$545,750 composed of an original award and a cost extension to the now defunct AN Foundation (NED1 & NED2, respectively); and \$211,173 to the active Disinformation Index, Inc. (NED3).

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<sup>148</sup> *Id.*

<sup>149</sup> The Global Disinformation Index (@DisinfoIndex), Twitter (now X) (Sep. 30, 2021, 12:03 PM) *available at* <https://x.com/disinfoindex/status/1443607364503015436?s=42&t=u8hEK0zejJhIrj8PBhzuqw>.

Acronym	NED Grant Number	Grantee Name	Start Date	End Date	Amount Paid
NED1	2020-10474 (2020-1116)	AN Foundation	7/1/2020	2/17/2023	\$230,000
NED2	2020-10474 (2020-1116) Cost-Extension	AN Foundation	7/1/2020	2/17/2023	\$315,750
NED3	2022-1181	Disinformation Index, Inc.	10/1/2022	2/17/2023	\$211,173
<b>TOTAL</b>					<b>\$756,923</b>

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The Grant Agreement for NED1 indicates an original end date of June 30, 2021, presumably extended by the administration of NED2 with the additional funding. The NED2 Grant Agreement viewed by this Committee is identical to NED1 (in fact, all documents produced for NED2 are identical to NED1), indicating either a production error or that no additional documentation was required for the additional funding. The intended end date of the funding to the AN Foundation is therefore unclear. The intended end date for NED3 was September 30, 2024. The Grant Agreement for NED3 indicates that the intended funding amount for that award was \$1,022,931.

Grant Agreement					
<b>1 NED Grant Number</b> 2022-1181	<b>2 Amount*</b>	<b>3 Term</b>	<b>4 Start Date</b>	<b>5 End Date</b>	
	a. Available	24 Months	October 01, 2022	September 30, 2024	
	b. Pending				
	c. Approved				
	\$511,931.00				
	\$511,000.00				
	\$1,022,931.00				
*Upon signature, only the amount indicated in Box 2a is obligated and available for payment. The pending amount shall be added to the subject availability of NED funds, compliance with the terms and conditions of this agreement, satisfactory progress of the project, and the continued ability to conduct the project as approved.					
<b>6 GRANTEE</b>					
Disinformation Index, Inc. 21750 Hardy Oak Boulevard, Suite 104, PMB 14273 San Antonio TX 78258-4946 United States			Federal Tax ID: 852450338		

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However, all NED funding was prematurely terminated on February 17, 2023. This coincides with pressure stemming from investigative reporting about the GDI's partnerships and activities.<sup>152</sup> A statement issued by the NED to the *Washington Examiner* confirms that funding was terminated as the GDI's work on domestic entities gives the appearance of contradicting the NED's strictly international mandate:

*“As set forth in our Articles of Incorporation and the NED Act, our mandate is to work around the world and not in the United States. We have strict policies and practices in place so that NED and the work we fund remains internationally focused, ensuring the Endowment does not become involved in domestic politics. Recently, we became aware that one of our grantees, the Global Disinformation Index (GDI), was engaged in an initiative, funded by a different donor, that focused*

<sup>150</sup> Original table created by the NED with the Acronym column added by the Comm. (on file with the Comm.).

<sup>151</sup> Agreement, Grant 2022-1181, Global Disinformation Index and National Endowment for Democracy, 1 (Sep. 25, 2022) (on file with the Comm.).

<sup>152</sup> Gabe Kaminsky, *Disinformation Inc: Government-backed organization sent \$315,000 to group blacklisting conservative news*, THE WASH. EXAMINER (Feb. 14, 2023).

*on specific U.S. media outlets. We recognize the important work GDI has done with NED support in other countries to help preserve the integrity of the information space and counter authoritarian influence. However, given our commitment to avoid the perception that NED is engaged in any work domestically, directly or indirectly, we will no longer provide financial support to GDI.”*<sup>153</sup>

The NED grant documents show that the NED was aware of the GDI’s work in the U.S. media market at the time of funding. In its NED1 application, the GDI also discloses its relationship with the World Federation of Advertisers (a body that represents roughly 90 percent of global advertising spend—almost one trillion dollars), the Global Alliance for Responsible Media (GARM), and other advertising bodies that heavily impact domestic advertising business:<sup>154</sup>

The objective here is to create pressure from top-down/bottom-up for a “whole-of-industry” and “whole-of-government” response. For example, we are in dialogue with the [World Federation of Advertisers](#) (WFA - the main global advertising body) and the [Interactive Advertising Bureau](#) (IAB - the main members body for ad tech and online media companies) as well as with GARM, which is leading the advertisers’ and ad tech industry’s responses on disinformation. These contacts, plus our work with governments via the Christchurch Call and other channels, gives us a strong base for engagement.

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Further, the Program Activities in the NED3 Project Description included the following, which seemingly would have impacted domestic entities in addition to the international work: (1) expand methodologies and capabilities to new “surfaces” including video (e.g., YouTube, broadcast, or cable television news), audio (e.g., radio broadcasts, podcasts), and apps (e.g., mobile, connected TV); and (2) further develop GDI’s pilot YouTube capability by implementing the full integration of the YT-DEL (presumably stands for YouTube Dynamic Exclusion List) channel identification capabilities with its existing Dynamic Exclusion List Quality Assurance process.<sup>156</sup>

The initial NED application (NED1) reported existing funding from the U.K. FDCO (committed funding of £1.4 million), Luminate (committed funding of \$1.4 million), Craig Newmark Philanthropies (\$120,000) and Becker Trust (\$50,000).<sup>157</sup> The GDI’s relationship with the U.K. FDCO was so entrenched that its Head of Programme, Susan Stern, was listed as a reference in the funding application.<sup>158</sup>

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<sup>153</sup> Gabe Kaminsky, *Disinformation Inc: State Department-backed group cuts ties with group blacklisting conservative news*, THE WASH. EXAMINER (Feb. 20, 2023).

<sup>154</sup> Allum Bokhari, *The Advertising Industry’s Deepening Role in Online Censorship*, FOUNDATION FOR FREEDOM ONLINE (Jul. 31, 2024).

<sup>155</sup> Application Documents – Proposal Narrative, National Endowment for Democracy Grant 2020-10474 (2020-1116), Global Disinformation Index, 8 (2020) (on file with the Comm.).

<sup>156</sup> Agreement, Grant 2022-1181, Global Disinformation Index and National Endowment for Democracy, 3 (Sep. 25, 2022) (on file with the Comm.).

<sup>157</sup> Application Documents – Proposal Narrative, National Endowment for Democracy Grant 2020-10474 (2020-1116), Global Disinformation Index, 8 (2020) (on file with the Comm.).

<sup>158</sup> *Id.*

By the time the GDI submitted its 2022 application for NED3, it had received the following funding:

Donor	Project Title	Start Date (MM/YYYY)	End Date (MM/YYYY)	Amount USD
Foundation for Freedom	<i>To promote youth participation in the political process</i>	09/2020	08/2021	\$20,000
UK government - Foreign, Commonwealth & Development Office	<i>Global Disinformation Index</i>	12/2019	09/2022	\$1.95m
Luminate	<i>Market testing</i>	03/2020	03/2023	\$400k
National Endowment for Democracy	<i>Strengthening Information Integrity in the Digital Space</i>	07/2020	09/2022	\$400k
Craig Newmark Philanthropies	<i>U.S. based work</i>	10/2021	09/2022	\$250k
Open Society Foundations	<i>General support</i>	02/2022	12/2022	\$150k
Bohemian Foundation	<i>U.S. election work</i>	05/2021	05/2021	\$150k
Becker Charitable Trust	<i>Bankrolling Bigotry</i>	06/2021	09/2021	\$175k
Reset.tech	<i>German election work</i>	07/2021	10/2021	\$75k
Global Engagement Center	<i>Accelerate languages roll out</i>	12/2021	12/2021	\$100k
Argosy Foundation	<i>Policy work</i>	02/2022	12/2022	\$75k

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#### iv. Partnerships

The GDI leverages its partnerships in the advertising space to achieve its aim of defunding disfavored outlets. In its application for the U.S.-Paris Tech Challenge, the GDI dictates likely users, audiences, and partners for its Veracity.ai product.

##### **Who are the likely users of this technological solution?**

Typical adopters of our technology are marketplace quality managers at ad tech platforms and brand safety leads within brands and ad agencies. In our data-driven advocacy work, we engage and collaborate with regulators and policy staffers around the world, including in Washington and Brussels, as well as in London, Canberra, and Wellington. Finally, we collaborate with partner NGOs such as Sum of Us and the Center for Countering Digital Hate, providing data to assist them in their broader industry and policy advocacy efforts.

##### **Who would be the target audience of the technological solution?**

Our target audience for our technology consists of advertising and other platform industry leaders, including marketplace quality managers, brand safety leads, policy and trust and safety teams within technology and payments or merchandising platforms, as well as regulatory and policy staffers and partner NGO advocates.

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The GDI's customers at the time of its GEC application included: MediaMath, IAS, Oracle Data Cloud, Quantcast, Peer39, Omnicom Media Group, Adthrive, Boston Scientific, Flatfile, Infolinks, OpenWeb, and Microsoft.<sup>161</sup> It also listed the French government as a partner, citing its support of the Open Terms Archive.

The GDI displays two dozen partnerships on its website, presumably to which it provides results of its risk determinations or are product licensees.

<sup>159</sup> Application Documents – Proposal Narrative, National Endowment for Democracy Grant 2022-1181, Global Disinformation Index, 14 (2022) (on file with the Comm.).

<sup>160</sup> Phase II Application, U.S.-Paris Tech Challenge, Global Disinformation Index (2021) (on file with the Comm.).

<sup>161</sup> *Id.*



Notably missing is Microsoft, which was a named partner in its U.S.-Paris Tech Challenge application and whose advertising company Xander used the GDI.<sup>163</sup> Upon inquiry by the *Washington Examiner*, Microsoft claimed it was examining the relationship with the GDI and would be suspending services in the interim.<sup>164</sup> It is unclear whether Microsoft followed through.

The GDI lost other partnerships because of its partisan methods, including with the multinational software company Oracle, whose Vice President for Corporate Communications stated: “[a]fter conducting a review, we agree with others in the advertising industry that the services we provide marketers must be in full support of free speech, which is why we are ending our relationship with GDI.”<sup>165</sup>

The U.K. FDCO (which had awarded approximately \$3.2 million (£2.6 million) to the GDI) similarly severed ties after alarm bells were rung by *UnHerd*, drawing the attention of the U.K. Business Secretary and ten members of British Parliament.<sup>166</sup> The GDI’s practice of down-ranking outlets if they assert differences in gender was said to run afoul a protected belief in British law.<sup>167</sup>

**v. GEC-GDI-Blacklist.docx**

The Committee obtained a copy of the internal GEC document titled “2023.02.14 GEC-GDI-BLACKLIST.docx”, which is dated March 2, 2023, despite its file name. It is a “voluntary” press guidance for GEC staff to use when asked about the GEC’s relationship with the GDI, the Park Advisors award projects, and the GEC’s work generally. The document instructs readers to inform inquirers that the Park Advisors award is no longer effect, has been archived, and if asked for any records to redirect to the FOIA process.<sup>168</sup>

Several claims are made in the document that are called into question by investigative reporting and internal GEC communications, documents, and requisite procedures. The first is that “the GEC does not and **has never attempted to moderate content on social media platforms**” (emphasis added).<sup>169</sup> It is a stated goal of the GEC to work with social media platforms to flag potentially TOS violative speech. This goal was communicated by the State Department at large to its Bureaus to coordinate with the GEC to do so with global content on U.S. platforms. That the U.S. government is asking companies to review this content on a voluntary basis does not

<sup>162</sup> *About*, GLOBAL DISINFORMATION INDEX (last visited Jul. 20, 2024).  
<sup>163</sup> Phase II Application, U.S.-Paris Tech Challenge, Global Disinformation Index (2021) (on file with the Comm.).  
<sup>164</sup> Gabe Kaminsky, *Disinformation Inc: Microsoft suspends relationship with group blacklisting conservative news*, WASH. EXAMINER (Feb. 11, 2023).  
<sup>165</sup> Gabe Kaminsky, *Disinformation Inc: Massive corporation Oracle severs ties with conservative blacklist group*, THE WASH. EXAMINER (Apr. 19, 2023).  
<sup>166</sup> Alex Farber, *MPs oppose funding disinformation ratings agency in blacklisting row*, THE TIMES (Apr. 19, 2024); Frederick Attenborough, *Governments Are Beginning to Resist ‘Disinformation Index’*, THE EUROPEAN CONSERVATIVE (May 2, 2024); Archie Earle, *David Cameron: Government will no longer fund Global Disinformation Index*, UNHERD (May 9, 2024).  
<sup>167</sup> As decided in the British case *Forstater v Centre for Global Development Europe*, the belief that sex is biological and immutable is a “protected philosophical belief” under Britain’s Equality Act 2010. *Maya Forstater -v- CGD Europe, Center for Global Development, Masood Ahmed*, Courts and Tribunals Judiciary (Jul. 6, 2022).  
<sup>168</sup> 2022.02.14.GEC-GDI-Blacklist.docx (on file with the Comm.).  
<sup>169</sup> *Id.*

mean that the government is not attempting to moderate content.

**Goal 4: U.S. Social Media Companies.** Following the Department guidance recently set forth in the recent ALDAC 21 STATE 35924, the AF Bureau is working in coordination with the Global Engagement Center (GEC) on identifying disinformation, propaganda, misinformation, and hate speech on U.S.-owned social media platforms that violates the relevant company's terms of service. This may include, but is not limited to, some instances wherein there may be a compelling foreign policy justification for the Department to request that the online platform voluntarily review the content. This includes collaborating with all interested State Department Bureaus and Embassy Addis Ababa to provide the GEC with foreign accounts, profiles and/or personas that have been identified as disseminating hate speech, misinformation, propaganda, or disinformation. The Department may engage with social media companies, in appropriate cases, through Diplomatic Security and/or the Bureau of Global Public Affairs.

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Even the limited emails reviewed by this Committee between the GEC and social media companies show GEC staff sending specific content to platforms the GEC believed to violate platform TOS. It is obvious that by doing so, the GEC sought to have this content actioned. TOS dictate what is allowed on a platform; by flagging violations, the GEC was sending platforms content the GEC did not believe should be on the platform. This is an attempt to moderate content. Similar to reporting content on platforms from personal accounts, the intent is to have the content actioned; except this is coming from the State Department of the United States Government. There is an inherent pressure with these submissions that does not exist when a personal account reports content as a possible TOS violation.

Further, the below email from USAID shows staff seeking the GEC's assistance with "content moderation issues."

I was connected to [REDACTED] (and then [REDACTED] based on a conversation related to USAID/Ethiopia and questions about how we elevate content moderation issues related to mis/dis/mal-information (MDM) to global technology platforms like Facebook, Twitter and YouTube. We'd love to learn from your private sector engagement approach and potentially collaborate on that engagement when we are working in the same places or on the same issues.

Here was the agenda that I drafted for our meeting with Sam:

- Introductions from USAID (OTI/ITR/DRG) and State (GEC)
- Recent Content Moderation Issues
- Process for Engaging Tech Platforms
- Opportunities to Collaborate

When you are settled in your new role, I'd love to introduce you to a few of my colleagues at USAID who are thinking through how to engage "Big Tech" and follow-up on deliverables from the Summit for Democracy. Maybe sometime in January or February?

Until then, happy holidays!

[REDACTED]

[REDACTED]

Senior Digital Technology Advisor for Field Programs Division  
Bureau for Conflict Prevention and Stabilization | Office of Transition Initiatives | Creative Digital Team  
US Agency for International Development  
Mobile: [REDACTED] | [REDACTED] [usaid.gov](mailto:[REDACTED]@usaid.gov)

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The GEC's caveats that its submissions were for the platform's "situational awareness" means only that the government was aiming to shield itself from First Amendment scrutiny.

<sup>170</sup> Interagency Action Plan for Ethiopia on Countering Hate Speech, Global Engagement Center, 7 (Nov. 2021) (On file with the Comm.).

<sup>171</sup> Email from USAID to Global Engagement Center Tech. Engagement Team (Dec. 22, 2021) (on file with the Comm.).

On Fri, Dec 11, 2020 at 7:15 PM [REDACTED] <[REDACTED]@state.gov> wrote:

Hi Neema & Stacia (apologies, I don't think I have Todd's email)

Thanks for taking the time to connect today - we appreciate the ongoing efforts to explore and align efforts to counter disinformation and propaganda.

Related to the discussion today, please find items of follow up below which we provide for your situational awareness.

- Russia Team
  - Canada-based disinformation outlet **Global Research** (formally the Centre for Research on Globalizations), which we outlined in our Pillars of Russia's Disinformation and Propaganda Ecosystem report, remains active on Twitter and continues to push disinformation surrounding COVID-19, vaccines, and the 2020 U.S. presidential election.
    - [Twitter](#) (English): 38.3K followers
    - [Twitter](#) (French): 4.6K followers
  - **The Duran** is an outlet not in Pillars report but very much on our radar for its role in Russia's disinformation ecosystem. Outlet based in Panama but run by a Cypriot company headed by a Moscow native. Prominent RT host is a director and writer. Rampantly pushing disinformation around the 2020 U.S. presidential election and some COVID-19/vax disinfo (great reset, etc.)

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**From:** [REDACTED]  
**Sent:** Monday, May 10, 2021 4:52 PM  
**To:** Neema Guliani <[REDACTED]@twitter.com>; Todd O'Boyle <[REDACTED]@twitter.com>; Stacia Cardille <[REDACTED]@twitter.com>  
**Cc:** [REDACTED] <[REDACTED]@state.gov>  
**Subject:** Global Research

Hi Neema and team,

I wanted to share some information from our GEC Russia team, seen below:

We noticed in a recent [tweet](#) from Global Research that Facebook took enforcement action against the outlet's main [page](#) on the platform. Per the tweet, YouTube also took action, though we are confirming to what extent.

As you may recall, we detailed Global Research in our [Russia Pillars](#) report and have briefed on how we are seeing them spread vaccine dis- and misinformation and Kremlin-aligned narratives in the past.

We wanted to flag for your situational awareness that Global Research's [primary Twitter account](#) (38.5K followers) we believe is heavily pushing vaccine dis- and misinformation (examples attached).

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<sup>172</sup> Email from Tech. Engagement Team, Global Engagement Center, U.S. Dep't of State, to Neema Guliani and Stacia Cardille, Twitter (Dec. 29, 2020) (on file with the Comm.).

<sup>173</sup> Email from Tech. Engagement Team, Global Engagement Center, U.S. Dep't of State, to Neema Guliani, Todd O'Boyle, and Stacia Cardille, Twitter (May 10, 2021) (on file with the Comm.).

Global Research's French language account, [Mondialisation.ca](https://www.mondialisation.ca), also pushes potentially problematic COVID-19 and vaccine dis- and misinformation, albeit to a lesser extent in the tweets themselves. While the tweets are not egregious, the content they link to often is.

As always, we highlight this information for your situational awareness only.

Lastly, [REDACTED] from the GEC Russia team in on CC for any questions or additional details.

All best,

[REDACTED]

[REDACTED]  
Technology Engagement Team  
Global Engagement Center | U.S. Department of State  
+1 [REDACTED] | [REDACTED]

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The disclaimers were not present on all emails containing content flagged by the GEC.

On Mon, May 2, 2022 at 10:35 AM [REDACTED] <[REDACTED]@state.gov> wrote:  
Hi Neema -

I hope all has been well! I'm following up on the GEC conversation with you, Roselena Martinez, and Tania Melo regarding El Salvador and Bukele. The GEC's Analytics & Research Team has provided identified accounts (attached) within the context of that conversation (outlined below).

From the discussion 28 March, GEC's A&R assesses that a network of accounts are amplifying propaganda and disinformation benefitting El Salvador's President Nayib Bukele. The team constructed this network from observations within their analysis of the conversation surrounding the Salvadoran Supreme Court's decision to allow sitting President Bukele to run for reelection from October 1 to October 31. All assessments are based on the network structure and account activity at that time.

A&R identified three distinct categories of accounts based on their posting activity: "Leader," "Lieutenant," and "Worker Bee."

- Leader accounts: have many followers and publish original content that is consistently retweeted at high levels. These accounts can either be associated with real individuals or organizations, such as government-affiliated accounts, or have no confirmed real-world identity. Nevertheless, they act as influencers within the network.
- Worker Bee accounts: have few followers and high daily tweets rates. They primarily retweet content from Leader and Lieutenant accounts and publish little to no original content of their own.
- Lieutenant accounts: are a hybrid of the first two categories; they have high daily tweet rates and produce some original content that is amplified by Worker Bee accounts. Lieutenant accounts also actively retweet Leader account content.

The attached list provides a mix of "Lieutenant" and "Worker Bee" accounts.

I don't have their emails but I'm hoping you will be able to share with Tania Melo and Roselena Martinez. As always, please feel free to reach out if you have any questions!

Cheers,

[REDACTED]

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<sup>174</sup> Email from Tech. Engagement Team, Global Engagement Center, U.S. Dep't of State, to Neema Guliani, Todd O'Boyle, and Stacia Cardille, Twitter (May 10, 2021) (on file with the Comm.).

<sup>175</sup> Email from Tech. Engagement Team, Global Engagement Center, U.S. Dep't of State, to Neema Guliani, Twitter (May 2, 2022) (on file with the Comm.).

The document continues with the claim that “[t]he GEC does not fund programs in the U.S.”<sup>176</sup> This statement turns on the interpretation of ‘programs.’ If ‘programs’ is interpreted to mean ‘projects’ or ‘initiatives,’ which is more likely, while the GEC does not fund initiatives domestically focused on their face, many of them do impact the U.S., as discussed throughout this report.

If ‘programs’ is interpreted to mean ‘organizations,’ which is less likely, it is also incorrect as the GEC has funded many organizations that, to the best of the Committee’s knowledge, are U.S.-based or have offices in the U.S, such as:

- 1) Albany Associates International (office in Bethesda, MD);
- 2) Atlantic Council;
- 3) Atlantic Council’s DFRLab;
- 4) Babylon, Inc.;
- 5) Center for European Policy Analysis;
- 6) Center for Strategic and International Studies;
- 7) CNA Corporation;
- 8) College of William and Mary;
- 9) Democracy Council of California;
- 10) DT Institute;
- 11) East-West Center;
- 12) E-Collaborative for Civic Education;
- 13) Equal Access International;
- 14) Freedom House;
- 15) GLOBSEC (office in Washington, D.C.);
- 16) Institute for War and Peace Reporting (office in Washington, D.C.);
- 17) International Center for Journalists;
- 18) International Center for Religion & Diplomacy;
- 19) International Republican Institute;
- 20) International Research and Exchanges Board;
- 21) National Democratic Institute for International Affairs;
- 22) NewsGuard (subaward);
- 23) Park Capital Investment Group;
- 24) Poynter Institute (subaward);
- 25) Project Harmony;
- 26) RAND Corporation;
- 27) Sayara International;
- 28) Search for Common Ground;
- 29) TechSoup;
- 30) The Critical Mass, LLC; and
- 31) Thomson Reuters Foundation.

The document also states that “Park Advisors served as our third-party implementer and administered the selection of GDI during the U.S.-Paris Tech Challenge in 2021 and issued the sub-award thereafter.”<sup>177</sup> This response is framed as if the GEC was not involved in selection of the U.S.-Paris Tech Challenge winners. The Director of the TET was one of the judges.<sup>178</sup>

Further, this suggests Park Advisors independently issued the GDI sub-award. Every award, and subaward,

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<sup>176</sup> 2022.02.14.GEC-GDI-Blacklist.docx (on file with the Comm.).

<sup>177</sup> *Id.*

<sup>178</sup> Program Packet, U.S.-Paris Tech Challenge (Sep. 29-30, 2021) (on file with the Comm.); *U.S.-Paris Tech Challenge*, ATLANTIC COUNCIL (last visited Aug. 2, 2024) *available at* <https://www.atlanticcouncil.org/event/u-s-paris-tech-challenge/>.

must be approved by the GEC. As relayed by the GEC grant officers and grant officer representatives during the April 9, 2024, briefing with Committee staff, subawards are very rarely administered prior to discussion with the GEC as awardees are required to obtain permission to administer them. Further, each awardee and subawardee is required to be assessed for various types of risk by GEC staff before granting the award.

Much of the remainder of the document is dedicated to discrediting the *Twitter Files*. As it was released on March 2, 2023, it is predated by *Twitter Files* #1-17, coincidentally (or not) the same day that *Twitter Files* #17 was published (“*New Knowledge, The Global Engagement Center, and State-Sponsored Blacklists*”).<sup>179</sup>

## C. NewsGuard

Self-anointed as “The Internet Trust Tool,” NewsGuard is a domestic for-profit business that rates the credibility of news and information outlets and tells readers and advertisers which outlets they can trust. In addition to online media outlets, NewsGuard also rates podcasts, blogs, broadcast news programs and television networks. Since its launch in 2018, NewsGuard has rated more than 35,000 news and information sources, accounting for 95 percent of online engagement with news across nine countries.<sup>180</sup>

These ratings, combined with NewsGuard’s vast partnerships in the advertising industry, select winners and losers in the news media space. NewsGuard guides spending and traffic toward approved press and away from outlets that NewsGuard deems to misalign with its metrics. Low ratings are particularly harmful to small outlets; their ability to compete is impeded by loss of much needed revenue for growth and a tarnished reputation as they are portrayed as unreliable, reducing circulation. These harms are remedied and ratings increased by adhering to NewsGuard’s requirements.

Like with all credibility rating systems that include subjective criteria, it is impossible to achieve objectivity in the outcomes. While NewsGuard publishes its assessments, offering transparency into its work, this does not negate that ratings are assigned through an unavoidable partisan lens.

### i. About NewsGuard

NewsGuard Technologies, Inc. is a for-profit entity headquartered in New York. Its initial funding of \$6 million was led by Publicis Groupe, with a total of 18 investors.<sup>181</sup> While headcount indicates it remains a small business, as it is a private company the Committee cannot confirm the financials against SBA maximums for current small business categorization. It was a small business at the time of its Federal awards, at least, as it qualified for the Small Business Innovation & Research (SBIR) award program in September of 2021.

NewsGuard has a global staff of ‘trained journalists’ and ‘information specialists.’ Its Board of Directors includes both co-founders/co-CEOs and the Chief Operating Officer of Publicis Groupe.<sup>182</sup> NewsGuard also has an Advisory Board that lends advice and subject-matter expertise; it is a commonsense assumption that the company’s thematic perception of fact is influenced by these members. NewsGuard asserts its Advisory Board plays no role in the press ratings or assessments unless otherwise noted and has no role in the governance or management of the organization.<sup>183</sup> On the Advisory Board sits Richard Stengel, the former head of the GEC, Tom Ridge, the former Secretary of DHS, Anders Fogh Rasmussen, the former head of NATO, and Michael Hayden,

<sup>179</sup> Matt Taibbi, *New Knowledge, the Global Engagement Center, and State-Sponsored Blacklists*, SUBSTACK (Apr. 13, 2023) originally released on Twitter (now X), Matt Taibbi (@mtaibbi) (Mar. 2, 2023, 12:00 PM) available at <https://x.com/mtaibbi/status/1631338650901389322?lang=en>.

<sup>180</sup> *About NewsGuard*, NEWSGUARD (last visited Jul. 20, 2024).

<sup>181</sup> *Brill and Crovitz Announce Launch of NewsGuard to Fight Fake News*, PUBLICIS GROUPE (Mar. 5, 2018).

<sup>182</sup> *Board of Directors*, NEWSGUARD (last visited Aug. 6, 2024).

<sup>183</sup> *Advisory Board*, NEWSGUARD (last visited Jul. 19, 2024).

a retired four-star general and former head of the CIA and NSA.<sup>184</sup>

NewsGuard is similar to the GDI in that it operates to stop the spread of disinformation using financial levers; they aim for the advertising revenue of businesses purported to spread MDM to be “targeted and whittled away” and for offending outlets to be “systemically defund[ed].”<sup>185</sup> However, NewsGuard’s methodology, and its justification for its ratings, are more transparent than the GDI’s, providing citations with their fact-checking. This does not mean that its methodology and output are free from bias or error; NewsGuard’s TOS states that it does not warrant that its services will be error-free, and that there may be inaccuracies in the content or other material made available through its services.<sup>186</sup>

NewsGuard also aims to protect ‘brand safety’ by helping blue-chip companies stop placing their ads on ‘harmful’ or ‘untrustworthy’ sites; the examples given include Chinese and Russian disinformation outlets, or those “peddling quack remedies.”<sup>187</sup> However, it is not just these blatantly dangerous outlets that are subject to NewsGuard’s ratings, but essentially all domestic press. NewsGuard’s impact is also far more significant than the GDI’s as its partnerships are much more expansive. Since it announced its relationships with State and the DOD, NewsGuard’s private partnerships have grown enormously, spanning from the highest echelons of advertising groups to tech companies to educational organizations. This impacts domestic press’ revenue and reach in each of those industries.

NewsGuard claims to believe “the answer to misinformation is not blocking content or censoring speech, but instead arming people with information that provides the context and digital literacy skills they need.”<sup>188</sup> This statement, which mirrors the foundational beliefs of this nation and of this Committee, does not align with NewsGuard in practice. NewsGuard leverages “human intelligence” (journalists on staff) to dictate an outlet’s trustworthiness.<sup>189</sup> Those deemed “untrustworthy” are then compiled into “exclusion lists,” with “trustworthy” sites on “inclusion lists,” which are licensed to advertisers to instruct their ad agencies and ad-tech partners to keep their programmatic ads off/on these sites.<sup>190</sup> This, in practice, impacts business revenue and reputation, the ability to compete, to retain staff, and generate content. Ratings accompanying links to news articles when the NewsGuard plugin is installed impact pageviews and reputation. It is a financial and perception-imposing backdoor to stifling the reach of certain outlets and amplifying others.

NewsGuard goes to great lengths to create the appearance of nonpartisanship and objectivity. Following prolonged media coverage and Congressional scrutiny on NewsGuard, its methodology, and its links to the government, NewsGuard’s co-founder/co-CEO Gordon Crovitz has written multiple articles in defense of its work.<sup>191</sup> It is true that NewsGuard gives fairer treatment to conservative-leaning businesses than the GDI. It is also true that its methodology is more transparent, with less evidence of partisan ideology being touted as fact. That does not mean that its treatment of the media is equal or that its methodology is free from error; nor does it mean that the Federal government should be giving taxpayer dollars to a company who operates to demonetize domestic press on a basis of their lawful speech, tells users which news businesses can be trusted, and profits off licensing press rating systems and ‘exclusion lists.’ Whether it aims to be objective or not, the government cannot support such an organization whose operations, by design, interfere with the press in this manner.

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<sup>184</sup> *Id.*; Michael Hayden is a signatory of the infamous letter by intelligence officers asserting that Hunter Biden’s laptop was Russian disinformation (a false claim that was used to ban business accounts like that of the *New York Post* from social media), yet he sits on the board of the company that tells users what is true or false and which businesses should be trusted.

<sup>185</sup> *Social Impact Report 2021*, NEWSGUARD, 1 (Jan. 2022); *NewsGuard Expands Service to Australia and New Zealand, Rating News Sources and Tracking False Narratives; Finds Climate Change Misinformation to be Major Subject of Unreliable Websites*, NEWSGUARD (Mar. 15, 2023).

<sup>186</sup> *Terms of Service*, NEWSGUARD (last visited Jul. 19, 2024).

<sup>187</sup> Gordon Crovitz, *Only transparent, apolitical ratings for news publishers can be trusted*, THE WASH. EXAMINER (Feb. 13, 2023).

<sup>188</sup> *Social Impact Report 2021*, NEWSGUARD, 13 (Jan. 2022).

<sup>189</sup> *About*, NEWSGUARD (last visited Aug. 15, 2024).

<sup>190</sup> Matt Skibinski, *Special Report: Top brands are sending \$2.6 billion to misinformation websites each year*, NEWSGUARD (last visited Aug. 15, 2024).

<sup>191</sup> Gordon Crovitz, *Advertisers fear supporting journalism, here’s how to fix that*, THE WASH. EXAMINER (Jul. 19, 2024); Gordon Crovitz, *Only transparent, apolitical ratings for news publishers can be trusted*, THE WASH. EXAMINER (Feb. 13, 2023).

It is not this Committee’s intention or responsibility to comb through all of NewsGuard’s ratings for inconsistencies in its work. It is NewsGuard’s prerogative and right to assess media as it sees fit and to act upon those assessments in the marketplace, as it is for all non-government actors. The Constitution guarantees that the government shall not interfere with the freedom of the press, however; Federal funds and support cannot be awarded to such an entity. A system that rates the credibility of press is fatally flawed as it is subject to the partisan lens of the assessor, making the ratings unreliable.

## ii. Products

### a. Reliability Ratings & Nutrition Labels

Reliability Ratings are NewsGuard’s scores for media and information outlets. These ratings are based on nine criteria and graded on a scale of zero to 100. Resulting totals dictate the level of caution NewsGuard suggests when consuming content from each outlet. As the ratings are assigned by outlet, rather than article-by-article, the rating stays the same regardless of topic or author; the same author can publish the same piece through a different outlet and the article will be attributed a completely different rating.

- 1) 100: High Credibility – the outlet adheres to all nine standards of credibility and transparency.
- 2) 75-99: Generally Credible – the outlet mostly adheres to basic standards of credibility and transparency.
- 3) 60 – 74: Credible with Exceptions – the outlet generally maintains basic standards of credibility and transparency, without significant exceptions.
- 4) 40 – 59: Proceed with Caution – the outlet is unreliable because it fails to adhere to several basic journalistic practices.
- 5) 0 – 39: Proceed with Maximum Caution – this website is unreliable because it severely violates basic journalistic standards.<sup>192</sup>

If a web browser has NewsGuard’s software installed, each outlet’s rating will appear next to its articles in online search engine results, social media posts of the articles, as well as on the articles themselves. If searching for news on a particular topic, and a user is faced with choosing a 100/100 rated outlet deemed to exhibit “High Credibility” versus a low rated outlet with a “Proceed with Maximum Caution” warning, it is more likely that user will choose and trust the content with the higher rating.<sup>193</sup> This becomes problematic when high-rated outlets are not being honest or objective, but the user is told they are trustworthy.

The weighted metrics used to determine each rating include qualifications necessary to earn the points in each category, which are awarded on a pass/fail basis; an outlet receives either all points associated with each criterion, or none.<sup>194</sup>

- 1) 22 points: does not repeatedly publish false or egregiously misleading content.
- 2) 18 points: gathers and presents information responsibly.
- 3) 12.5 points: has effective practices for correcting errors.
- 4) 12.5 points: handles the difference between news and opinion responsibly.
- 5) 10 points: avoids deceptive headlines.
- 6) 7.5 points: website discloses ownership and financing.
- 7) 7.5 points: clearly labels advertising.
- 8) 5 points: reveals who’s in charge, including possible conflicts of interest.
- 9) 5 points: provides the names of content creators, along with either contact or biographical information.<sup>195</sup>

<sup>192</sup> *Website Rating Process and Criteria*, NEWSGUARD (last visited Jul. 19, 2024).

<sup>193</sup> *NewsGuard’s Online Source Rating Tool: User Experience*, GALLUP (Jan. 2019).

<sup>194</sup> *Website Rating Process and Criteria*, NEWSGUARD (last visited Jul. 19, 2024).

<sup>195</sup> *Id.*

NewsGuard explains that while in some instances the pass/fail system may make the ratings less precise, the alternative of awarding partial points for each is not feasible for the volume of news outlets they rate.<sup>196</sup> This is one area where subjective decision-making and bias seem to enter NewsGuard’s rating process; the threshold of when a category’s points are forfeit is not clear and appears to differ by outlet. This is demonstrated by reviewing the ‘Nutrition Label,’ or scoring justification, of each outlet, which includes: (1) the evidence and examples NewsGuard uses to defend each assessment, (2) any relevant exchanges with the outlet about the score, and (3) a history of the outlet’s ratings.<sup>197</sup> While heavily contributing to NewsGuard’s transparency, it sheds light on deference given to outlets receiving categorical points despite blatant, repeat violations that are omitted from its Nutrition Label.

NewsGuard claims to be fighting for the truth to prevail, yet when a high-ranking outlet is misreporting a story, receives the points in content categories, violations are not cited in its Nutrition Labels, and the user is told the outlet is trustworthy, NewsGuard is ironically doing the opposite. This is demonstrated with the mainstream media’s selective framing that former President Trump warned of a ‘bloodbath’ to come if he does not win the 2024 Presidential election, when he was talking about the auto-industry.<sup>198</sup> The below are all deceptive headlines that are not reflected in the respective outlets’ Nutrition Labels. Each of these outlets receives the points for the “avoids deceptive headlines” category, despite the category requirement that “slightly sensational” headlines not misrepresent content.

- 1) *The Associated Press* (100/100) via *NPR* (100/100): “Trump says some migrants are ‘not people’ and warns of ‘bloodbath’ if he loses.”<sup>199</sup>
- 2) *The Associated Press* (100/100) via *CBS News* (90/100): “In Ohio campaign rally, Trump says there will be a “bloodbath” if he loses November election.”<sup>200</sup>
- 3) *NBC News* (100/100): “Trump says there will be a ‘bloodbath’ if he loses the election.”<sup>201</sup>
- 4) *NYT* (87.5/100): Trump Says Some Migrants Are ‘Not People’ and Predicts a ‘Blood Bath’ if He Loses,<sup>202</sup> Trumps Warning of a ‘Blood Bath’ if He Loses<sup>203</sup>
- 5) *Politico* (100/100): Trump says country faces ‘bloodbath’ if Biden wins in November<sup>204</sup>
- 6) *The Washington Post* (100/100): “The bloodbath Trump promised has already begun.”<sup>205</sup>

Another example is the recent assassination attempt on former President Trump. The following headlines are similarly omitted from the high-rated outlets’ Nutrition Labels and the outlets receive the “avoids deceptive headlines” category points.

- 1) *The Associated Press* (95/100) via *ABC News* (75/100): “Donald Trump escorted off stage by Secret Service during rally after loud noises ring out in crowd.”<sup>206</sup>
- 2) *CNN* (80/100): “Secret Service rushes Trump off stage after he falls at rally;”<sup>207</sup> “Trump injured in incident at rally.”<sup>208</sup>

<sup>196</sup> *Id.*

<sup>197</sup> *Id.*

<sup>198</sup> *Id.*; David Emery, *Did Trump Say It Will Be a ‘Bloodbath for the Country’ If He Doesn’t Get Elected?*, SNOPE (Mar. 17, 2024).

<sup>199</sup> *Trump says some migrants are ‘not people’ and warns of ‘bloodbath’ if he loses*, NPR, THE ASSOCIATED PRESS (Mar. 17, 2024).

<sup>200</sup> *In Ohio campaign rally, Trump says there will be a “bloodbath” if he loses November election*, CBS NEWS, THE ASSOCIATED PRESS (Mar. 18, 2024).

<sup>201</sup> Emma Barnett & Jillian Frankel, *Trump says there will be a ‘bloodbath’ if he loses the election*, NBC NEWS (Mar. 16, 2024).

<sup>202</sup> Anjali Huynh & Michael Gold, *Trump Says Some Migrants Are ‘Not People’ and Predicts a ‘Blood Bath’ if He Loses*, THE N.Y. TIMES (Mar. 18, 2024).

<sup>203</sup> *Trumps Warning of a ‘Blood Bath’ if He Loses*, THE N.Y. TIMES (Mar. 18, 2024).

<sup>204</sup> Myah Ward, *Trump says country faces ‘bloodbath’ if Biden wins in November*, POLITICO (Mar. 16, 2024). This is despite a March 11, 2024 Politico headline titled “Bloodbath at RNC: Trump team slashes staff at committee.”

<sup>205</sup> Dana Milbank, *The bloodbath Trump promised has already begun*, THE WASH. POST (Mar. 22, 2024).

<sup>206</sup> *Donald Trump escorted off stage by Secret Service during rally after loud noises ring out in crowd*, ABC NEWS via THE ASSOCIATED PRESS (Jul. 13, 2024).

<sup>207</sup> *Secret Service rushes Trump off stage after he falls at rally*, CNN (Jul. 13, 2024).

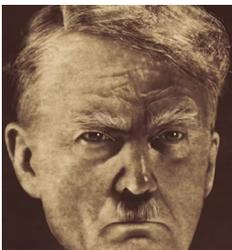
<sup>208</sup> *Trump injured at incident at rally*, CNN (Jul. 13, 2024).

- 3) *NBC News* (100/100): “Secret Service rushes Trump offstage after popping noises heard at his Pennsylvania rally.”<sup>209</sup>
- 4) *NewsWeek* (100/100): “Trump campaign launches GoFundMe after shooting;”<sup>210</sup> “MAGA Responds With Outrage After Donald Trump Injured at Pennsylvania Rally.”<sup>211</sup>
- 5) *NYT* (87.5/100): “Trump Rushed Off Stage After Chaos at Rally.”<sup>212</sup>
- 6) *USA Today* (100/100): “Trump removed from stage by Secret Service after loud noises startles former president, crowd.”<sup>213</sup>
- 7) *The Washington Post* (100/100): “Trump escorted away after loud noises at Pa. rally.”<sup>214</sup>

Relying only on these high-ranked media, readers may have had no idea that there was an assassination attempt on the former President. They may have thought he set up a fundraiser for himself, rather than the families and victims at the rally. While NewsGuard seeks to “restore trust in the media,” with many issues they are making it harder for the truth to come out.

This is a theme with many of the content categories. There are many outlets that receive the points for “gathers and presents information responsibly,” for instance, despite numerous violations omitted from their Nutrition Labels. Examples include *The New Republic* (92.5/100) and *The Washington Post* (100/100), each with many headlines exhibiting precisely the type of rhetoric that would reasonably be considered irresponsible, but evidently fails to register, even though this metric requires outlets to be **fair and accurate** in reporting and presenting information.<sup>215</sup> That some of these headlines are attached to opinion pieces does not negate their irresponsibility.

- 1) *The New Republic* (92.5/100): “Trump Will Be a Dictator on Day One and Every Day Thereafter;”<sup>216</sup> X post: “Behind all of Elon Musk’s bloviating and attention-seeking is a small man who is simply not very good at anything” linking to article: “Elon Musk is *The New Republic’s* 2023 Scoundrel of the Year – He proved this year that he’s not just evil, he’s deeply stupid, too;”<sup>217</sup> Series: “What American Fascism Would Look Like.”<sup>218</sup>  
(This article series is headed by a picture of former President Trump as Adolf Hitler.)



- 2) *The Washington Post* (100/100): “Yes, It’s okay to compare Trump to Hitler. Don’t let me stop you;”<sup>219</sup> “A Trump dictatorship is increasingly inevitable. We should stop pretending;”<sup>220</sup> “The Trump

<sup>209</sup> *Secret Service rushes Trump offstage after popping noises heard at his Pennsylvania rally*, NBC NEWS (Jul. 13, 2024).

<sup>210</sup> Flynn Nichols, *Trump campaign launches GoFundMe after shooting*, NEWSWEEK (Jul. 14, 2024).

<sup>211</sup> Jason Lemon, *MAGA Responds With Outrage After Donald Trump Injured at Pennsylvania Rally*, NEWSWEEK (Jul. 13, 2024).

<sup>212</sup> *Trump Rushed Off Stage After Chaos at Rally*, THE N. Y. TIMES (Jul. 13, 2024).

<sup>213</sup> *Trump removed from stage by Secret Service after loud noises startles former president, crowd*, USATODAY (Jul. 13, 2024)

<sup>214</sup> *Trump escorted away after loud noises at Pa. rally*, THE WASH. POST (Jul. 13, 2024).

<sup>215</sup> *Website Rating Process and Criteria*, NEWSGUARD (last visited Jul. 19, 2024).

<sup>216</sup> Matt Ford, *Trump Will Be a Dictator On Day One and Every Day Thereafter*, THE NEW REPUBLIC (Dec. 6, 2023).

<sup>217</sup> The New Republic (@newrepublic), Twitter (now X) (Aug. 24, 2024, 7:12 PM) available at <https://x.com/newrepublic/status/1827484106503901293?s=42>; Alex Shepard, *Elon Musk Is The New Republic’s 2023 Scoundrel of the Year*, THE NEW REPUBLIC (Dec. 27, 2023).

<sup>218</sup> Michael Tomasky, et al., (Series) *What American Fascism Would Look Like*, THE NEW REPUBLIC (2024).

<sup>219</sup> Mike Goodwin, *Yes, it’s okay to compare Trump to Hitler. Don’t let me stop you.*, THE WASH. POST (Dec. 20, 2023).

<sup>220</sup> Robert Kagan, *A Trump dictatorship is increasingly inevitable. We should stop pretending.*, THE WASH. POST (Nov. 30, 2023).

dictatorship: How to stop it;”<sup>221</sup> “If Donald Trump became a dictator, who could stop him?;”<sup>222</sup> “Can anyone stop the coming Trump dictatorship?”<sup>223</sup>

Further, the “handles the difference between news and opinion responsibly” metric requires that opinionated language generally not be presented as news and that opinion pieces be clearly labeled.<sup>224</sup> NewsGuard claims that its scoring process is designed to ensure its criteria are applied equally and accurately to all sites, irrespective of an outlet’s political leaning.<sup>225</sup> There are many media outlets with top scores, however, that repeatedly exhibit clear bias and purport opinion as fact without discern but are awarded the points in this category. One blatant example of this is *The Atlantic*, which receives a perfect 100/100 score despite consistently touting left-leaning narratives without clearly differentiating opinion pieces.<sup>226</sup> Recent examples include: “Trump Can’t Deal with Harris’s Success;”<sup>227</sup> “Suddenly Trump Looks Older and More Deranged;”<sup>228</sup> “A Searing Reminder That Trump Is Unwell;”<sup>229</sup> “Trump Is Suddenly Running Scared;”<sup>230</sup> “Trump Should Never Have Had This Platform;”<sup>231</sup> “We Still Don’t Know What to Do With the Endless Stream of Trump Lies;”<sup>232</sup> and “The Gunman and the Would-Be Dictator.”<sup>233</sup>

This metric also requires that if an outlet has an overall agenda or point of view that it advances by its choice of the stories it covers or the views it advances that those be clearly disclosed.<sup>234</sup> It is no secret that legacy media paints different political parties in vastly different lights. This is a pattern and why it is no surprise that trust in the media has declined.<sup>235</sup> Conservative figures are consistently portrayed negatively while Democratic figures receive puff pieces and are not scrutinized in the same manner. It is as dishonest for “The Internet Trust Tool” to ignore this as it is for the mainstream media to pretend their bias doesn’t exist.

This theme is exhibited in the framing of Democratic campaigns (such as the recent *CBS News* (90/100) portrayal of Vice President Harris’ flip-flopping as “moderation” of her policies) and when presenting the same position stemming from opposing campaigns.<sup>236</sup> *CBS*’s coverage on the policy platform of removing tax from tips when proposed by former President Trump compared with Vice President Harris exemplifies this:

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<sup>221</sup> Robert Kagan, *The Trump dictatorship: How to stop it*, THE WASH. POST (Nov. 30, 2023).

<sup>222</sup> Amber Phillips & Jillian Banner, *If Donald Trump became a dictator, who could stop him?*, THE WASH. POST (Dec. 18, 2023).

<sup>223</sup> Robert Kagan, *Can anyone stop the coming Trump dictatorship*, THE WASH. POST (Dec. 26, 2023).

<sup>224</sup> *Website Rating Process and Criteria*, NEWSGUARD (last visited Jul. 19, 2024).

<sup>225</sup> *Id.*

<sup>226</sup> Many of these headlines have a ‘Politics’ category header, but do not designate them as opinion.

<sup>227</sup> Peter Wehner, *Trump Can’t Deal With Harris’s Success*, THE ATLANTIC (Aug. 12, 2024).

<sup>228</sup> Anne Applebaum, *Suddenly Trump Looks Older and More Deranged*, THE ATLANTIC (Jul. 22, 2024).

<sup>229</sup> Tom Nichols, *A Searing Reminder That Trump Is Unwell*, THE ATLANTIC (Jul. 19, 2024).

<sup>230</sup> David A. Graham, *Trump Is Suddenly Running Scared*, THE ATLANTIC (Aug. 2, 2024).

<sup>231</sup> David Frum, *Trump Should Never Have Had This Platform*, THE ATLANTIC (Jun. 28, 2024).

<sup>232</sup> David A. Graham, *We Still Don’t Know What to Do With the Endless Stream of Trump Lies*, THE ATLANTIC (July 11, 2024).

<sup>233</sup> David Frum, *The Gunman and the Would-Be Dictator*, THE ATLANTIC (Jul. 14, 2024).

<sup>234</sup> *Website Rating Process and Criteria*, NEWSGUARD (last visited Jul. 19, 2024).

<sup>235</sup> Megan Brenan, *Americans’ Trust In Media Remains Near Record Low*, GALLUP (Oct. 18, 2022) (finding just 7 percent of Americans have a “great deal” of trust and confidence in the media, while 28 percent say they do not have very much confidence and 38 percent have none at all in newspapers, TV, and radio).

<sup>236</sup> CBS News (@CBSNews), *Here’s how Kamala Harris is moderating some of her more controversial policy stances as a presidential candidate*, Twitter (now X) (Aug. 15, 2024) available at <https://x.com/cbsnews/status/1824272367452815724?s=10>, linking to Kathryn Watson, *The evolution of Kamala Harris’ stances on single-payer healthcare, fracking, and the Supreme Court*, CBS NEWS (Aug. 15, 2024).



Former President Donald Trump's vow to stop taxing tips would cost the federal government up to \$250 billion over 10 years, according to a nonpartisan watchdog group.



Vice President Kamala Harris is rolling out a new policy position, saying she'll fight to end taxes on tips for service and hospitality workers.



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It is not clear what NewsGuard's threshold is to remove categorical points. It is not clear how it chooses which outlets to rate or which to heavily scrutinize over others. It is not clear that the issues they assess in Nutrition Labels are evenly spread across the political aisle or that, despite their claims, that politics has no impact on their assessments.<sup>238</sup> This is especially true given NewsGuard's recent questioning of George Washington University Law School professor Jonathan Turley about his political leanings and why they aren't disclosed on his blog.<sup>239</sup> As Professor Turley asks in his reporting of the conversation, is this question posed to all outlets NewsGuard rates?<sup>240</sup> Drawing no conclusions, it is of note that Professor Turley wrote an article about NewsGuard roughly one week before he was contacted for rating.

While NewsGuard claims their "work rating news sources and identifying false narratives [...] is entirely independent and free of any outside influence," it does not seem to be free of *inside* influence.<sup>241</sup> As stated, press rating systems are inherently flawed because they are subject to the partisan lens of the assessor. That these ratings have significant impacts on the operation, revenue, reputation, and reach of domestic media businesses drives home the same conclusion: press 'trust' rating organizations should not receive Federal funding or support.

## b. Misinformation Fingerprints

In the process of rating outlets, NewsGuard catalogues what it determines to be the most prominent falsehoods and "misinformation narratives" spreading across these sites, "capturing data and examples about each hoax that can be used as a "Fingerprint" for the hoax by AI and machine learning tools."<sup>242</sup> Misinformation Fingerprints is the resulting licensable dataset of these narratives, covering topics such as election fraud and COVID-19. It is human curated, and so the dataset content and theme (as well as evidence used to argue fact or falsehood) are subject to biases of NewsGuard's staff. Launched in 2021, the catalog is continuously updated and machine-readable, "purpose-built for artificial-intelligence tools to identify the provenance of hoaxes and track

<sup>237</sup> CBS News (@cbsnews), Twitter (now X) (Jun. 17, 2024, 4:40 PM) available at <https://x.com/cbsnews/status/1802803402545467446?s=10>; CBS News (@cbsnews), Twitter (now X) (Aug. 12, 2024, 1:30 PM) available at <https://x.com/cbsnews/status/1823049308230324279?s=10>.

<sup>238</sup> *Website Rating Process and Criteria*, NEWSGUARD (last visited Jul. 19, 2024) NewsGuard claims that its scoring process is designed to ensure its criteria are applied equally and accurately to all sites, irrespective of an outlet's political leaning.

<sup>239</sup> Jonathan Turley, *A Shield or Sword? A Response to NewsGuard*, RES IPSA LOQUITUR – THE THING ITSELF SPEAKS (Jul. 29, 2024).

<sup>240</sup> Jonathan Turley, *The Most Chilling Words Today: I'm from NewsGuard and I am Here to Rate You*, RES IPSA LOQUITUR – THE THING ITSELF SPEAKS (Jul. 29, 2024).

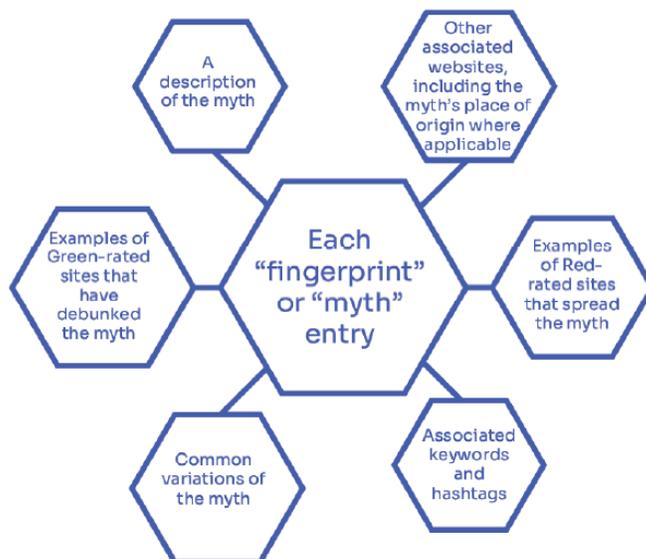
<sup>241</sup> Email from Gordon Crovitz, NewsGuard, Co-CEO, to Matt Taibbi, RacketNews, Investigative Journalist (Mar. 10, 2023).

<sup>242</sup> *NewsGuard wins Pentagon-State Department contest for detecting COVID-19 misinformation and disinformation*, NEWSGUARD (Aug. 18, 2020).

the spread of narratives in real time.”<sup>243</sup> In practice, this means that Misinformation Fingerprints allow users to pick a narrative from the database and search websites and social media to see who is using that speech.<sup>244</sup>

Accompanying each “Fingerprint” is the following data:

- 1) Example language used to advance the narrative;
- 2) Variations of the narrative;
- 3) Evidence supporting why that narrative is false;
- 4) Source and timing of each narrative’s emergence;
- 5) Links to examples of the narrative online;
- 6) Related keywords and hashtags; and
- 7) A “risk of harm” designation.<sup>245</sup>



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By the end of 2021, 762 “false narratives” had been entered into the Misinformation Fingerprints catalog.<sup>247</sup> The dataset grew to 1,122 Fingerprints by the end of 2022, and 1,887 by the end of 2023.<sup>248</sup>

As demonstrated in the U.S. Government Funding section, taxpayer dollars were leveraged to develop the Misinformation Fingerprints product. The Pentagon and State were the first to use Misinformation Fingerprints to “counter disinformation,” essentially outsourcing the U.S. government’s perception of fact to NewsGuard.<sup>249</sup>

### c. NewsGuard for Advertising

NewsGuard for Advertising is a product for the advertising industry that uses NewsGuard’s Reliability Ratings/Nutrition Labels to curate ‘inclusion’ and ‘exclusion’ lists of outlets assigned various levels of trustworthiness.<sup>250</sup> This impacts rated media outlets’ ability to earn advertising revenue; spending is driven away from outlets on the exclusion lists, which, similar to the GDI’s Dynamic Exclusion List, are essentially blacklists.

<sup>243</sup> *Social Impact Report 2021*, NEWSGUARD, 3 (Jan. 2022).

<sup>244</sup> *Id.* at 36.

<sup>245</sup> *Misinformation Fingerprints*, NEWSGUARD (last visited Jul. 19, 2024).

<sup>246</sup> *Social Impact Report 2021*, NEWSGUARD, 36 (Jan. 2022).

<sup>247</sup> *Social Impact Report 2021*, NEWSGUARD, 1 (Jan. 2022).

<sup>248</sup> *Id.*; *Social Impact Report 2023*, NEWSGUARD, 5 (Jan. 2024).

<sup>249</sup> *Social Impact Report 2021*, NEWSGUARD, 3 (Jan. 2022).

<sup>250</sup> *Social Impact Report 2020*, NEWSGUARD, 19, (2020); *NewsGuard Launches Six New Brand Safety Tiers, Enabling Greater Control for Advertisers to Support Credible News and Avoid Misinformation*, NEWSGUARD (Dec. 7, 2022).

Pre-assembled lists are offered in various tiers depending on what the brands or their advertising partners are looking for; if they want to “maximize safety” they can choose to exclude all websites NewsGuard deems to be spreaders of misinformation or conspiracies, but also those which they deem to be credible but have had significant exceptions in journalistic standards.<sup>251</sup> There are pre-filled lists that maximize reach while still avoiding outlets deemed to spread clearly harmful disinformation; this is subject to what NewsGuard’s analysis determines to be lower-tier reliable news sites.<sup>252</sup> Users of NewsGuard for Advertising are also able to craft custom news inclusion or exclusion lists “based on their standards,” but if the users are paying for NewsGuard’s services and NewsGuard is telling them an outlet isn’t trustworthy, it is obviously less likely the advertiser will ignore their findings and place ads anyway.

Packages are also offered specifically for election misinformation. This includes website, podcast, and television ratings, as well as access to NewsGuard’s election-focused exclusion list, complete with regularly scheduled “check-ins” with NewsGuard’s team to discuss specific misinformation narratives.<sup>253</sup>

NewsGuard’s reach in this space is demonstrated by its vast partnerships. The ad industry is evidently placing less and less ads on news outlets generally for fear of spiking controversy, but that does not mean that ads have completely disappeared from the press. The programmatic advertising industry places 15 million ad impressions per second, every second of the day.<sup>254</sup> The average campaign for larger advertisers places these ads across 44,000 websites.<sup>255</sup> This is a huge industry and revenue source in which the scales are no longer even. It impacts the ability of domestic press to compete online. For small outlets on exclusion lists, it interferes with much needed revenue for growth.

#### **d. Social Impact Reports**

NewsGuard releases annual Social Impact Reports detailing their work. The scale of NewsGuard’s impact on the news and media industry is informed by these statistics.

By the end of 2021, NewsGuard had rated 7,466 domains covering 95 percent of online engagement.<sup>256</sup> Seven million public library patrons used their Nutrition Label product. NewsGuard’s ratings were used as a factor in what global news aggregators curated, reaching 625 million monthly users.<sup>257</sup> This is indicative of NewsGuard’s impact on the ability for a business to grow and succeed. If NewsGuard deems it untrustworthy, it is less likely to be included in a news aggregator site using their product.

NewsGuard had reviewed 8,641 domains by the end of 2022.<sup>258</sup> In January 2022, NewsGuard secured a partnership with the American Federation of Teachers, giving access to its Reliability Ratings browser extension to 1.7 million teachers, their students, and families.<sup>259</sup> Students’ perception of who to trust was therefore in the hands of 35 NewsGuard staff.<sup>260</sup> This is furthered by NewsGuard’s partnership with Turnitin, which is used by over 34 million students.<sup>261</sup>

By the end of 2023, NewsGuard had rated more than 10,000 websites and more than 35,000 total publishers spanning websites, social media platforms, podcasts, and television channels.<sup>262</sup> Most of these are

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<sup>251</sup> *Social Impact Report 2023*, NEWSGUARD, 15 (Jan. 2024).

<sup>252</sup> *Id.*

<sup>253</sup> *Id.* at 17.

<sup>254</sup> *NewsGuard for Advertising*, NEWSGUARD (last visited Jul. 23, 2024).

<sup>255</sup> *Id.*

<sup>256</sup> *Social Impact Report 2021*, NEWSGUARD, 1 (Jan. 2022).

<sup>257</sup> *Id.* at 12.

<sup>258</sup> *Social Impact Report 2022*, NEWSGUARD, 1 (Jan. 2023).

<sup>259</sup> *Id.*

<sup>260</sup> *Social Impact Report 2021*, NEWSGUARD, 1 (Jan. 2022).

<sup>261</sup> *Turnitin Partners with NewsGuard to Offer Students and Teachers its Media Literacy Tools*, NEWSGUARD (May 4, 2020).

<sup>262</sup> *Social Impact Report 2023*, NEWSGUARD, 5 (Jan. 2024); *About*, NEWSGUARD (last visited Jul. 29, 2024).

small businesses, not legacy media outlets. It is hard enough for small and independent press outlets to compete with mainstream media without the interference of an organization that impedes their reputation, circulation, and ability to earn advertising revenue, let alone one that has received Federal funding and support.

### iii. U.S. Government Funding

NewsGuard has received Federal funding from the GEC and the DOD. The structure of these awards included licensing fees for the Misinformation Fingerprints database and for NewsGuard to carry out government-research work that further developed its product. Those initial relationships with significant U.S. government bodies were then promoted by NewsGuard, and extensive partnerships in the private sector followed.

While NewsGuard presents these transactions purely as licensing agreements for its Misinformation Fingerprints product (“[t]hese licenses are only for access to our data”), it is fundamental to recipients of DOD SBIR awards that they engage in research/R&D to meet the needs of the Armed Services.<sup>263</sup> NewsGuard also states in its 2021 *Social Impact Report* that it used the SBIR award to “further develop” its Misinformation Fingerprints program.

#### SBIR AWARD FROM DEPARTMENT OF DEFENSE

Disinformation has become a top defense concern in the U.S. and elsewhere, and information warfare poses a substantial national security threat in the modern era. Mis- and disinformation efforts from foreign adversaries can sow division, confusion, and extremism in the ranks; increase the risk of domestic terrorism; and disrupt democratic processes.

In September 2021, NewsGuard was awarded a grant through the Small Business Innovation and Research program, which funds early-stage companies to develop products and technologies that can be helpful for government. Under the grant, NewsGuard plans to further develop the Misinformation Fingerprints tool and test the effectiveness of the Fingerprints in detecting state-sponsored disinformation campaigns.

With the cybersecurity industry populated largely by AI and machine-learning tools, NewsGuard’s human intelligence approach has proven to be a unique and valuable offering. “We were surprised to see that a solution like NewsGuard’s using human intelligence could work so well,” said Dan Madden, Director for the Mid-Atlantic Region of the National Security Innovation Network.

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### a. GEC/DOD Split Award

Although not disclosed in production to this Committee (as only the below \$50,000 Park Advisors subaward from 2022 is reflected), NewsGuard was issued \$25,000 in November 2020 through a Park Advisors subaward for a four-month project to help the GEC and USCYBERCOM better understand the origins, content, and spread of certain foreign disinformation campaigns.<sup>265</sup>

Described as a “pilot” award, this is the first known Federal funding to NewsGuard, which evidently led to the second Park Advisors/GEC award and the DOD SBIR award. By winning the competition, NewsGuard’s Misinformation Fingerprints tool was subsequently “sponsored” on the GEC’s Testbed/Disinfo Cloud, and therefore promoted to the GEC’s partners.<sup>266</sup>

Reminiscent of the *Minority Report’s* “pre-crime,” the competition sought a solution to “identifying hoaxes and misinformation in advance” — what NewsGuard described as “prebunking” of “hoaxes from its already identified sources of misinformation.”<sup>267</sup> While NewsGuard’s press release about winning the award says

<sup>263</sup> Email from Gordon Crovitz, NewsGuard, Co-CEO, to Matt Taibbi, RacketNews, Investigative Journalist (Mar. 10, 2023); *The SBIR and STTR Programs*, U.S. SMALL BUS. ADMIN. (last visited Apr. 17, 2024).

<sup>264</sup> *Social Impact Report 2021*, NEWSGUARD, 37 (Jan. 2022).

<sup>265</sup> On file with the Comm.

<sup>266</sup> NSIN Challenge – Countering COVID19 Disinformation, NATIONAL SECURITY INNOVATION NETWORK (last visited Jul. 21, 2024).

<sup>267</sup> *NewsGuard wins Pentagon-State Department contest for detecting COVID-19 misinformation and disinformation*, NEWSGUARD (Aug. 18, 2020).

the work would be focused on “identifying online sources spreading COVID-19 disinformation,” the affiliated Statement of Work is focused on disinformation designed to influence the 2020 U.S. elections.<sup>268</sup> COVID-19 narratives were presumably folded into this.

Exhibit 1

STATEMENT OF WORK (SOW)

This Statement of Work is governed by the Contract Agreement, by and between Park Advisors whose address is 5001 15<sup>th</sup> St N, Arlington, VA 22205 and NewsGuard (hereinafter referred to as “Service Provider”), whose address is 25 W. 52nd St, New York, NY 10019.

**Background Regarding Services to Be Performed by the Service Provider:**

Adversary states continue to engage in disinformation campaigns intended to influence the 2020 United States elections. The themes and narratives supporting these campaigns seek to undermine fundamental aspects of democratic society. Research on foreign state-sponsored disinformation from the 2016 U.S. elections showed that foreign adversaries exploited divisive issues, targeted certain communities, and disseminated messages using key influencers. As foreign interference before and after the 2020 U.S. elections continues course, this pilot aims to identify the niche topics being exploited, the narratives being spread, and the influencers who hold sway over target audiences.

**Deliverables to Be Provided by the Service Provider:**

A series of reports that will help the GEC, USCYBERCOMMAND, and relevant partners better understand the origins, content, and spread of state-sponsored disinformation campaigns. Expected cadence for the delivery of reports will be set by the GEC and USCYBERCOMMAND and may vary from month to month.

The focus of the reports will vary based on emerging events but will include insights on the following to the extent possible, tracking over time:

- 1) Which states are actively pushing certain narratives ahead of and after the 2020 U.S. elections with an aim to undermine the U.S.? (with an initial focus on examining Chinese and Russian state media)
- 2) What are these key narratives being amplified?
- 3) What broader disinformation themes and content are being pushed by China and Russia?

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Although recent discussion of this award suggested only the Misinformation Fingerprints tool was used for this and other Federal projects, NewsGuard’s press release about winning the competition suggested the Reliability Ratings/Nutrition Labels products were also involved, at least in the application if not execution of the award.

To meet this challenge, NewsGuard offered a “human intelligence” solution with two key components:

- Access to NewsGuard’s constantly updated database of journalist-produced ratings and “Nutrition Labels” for thousands of news and information websites in the U.S. and Europe. The database, available through an API, a browser extension and mobile apps, covers all the sites accounting for 95% of engagement in each market and includes numerous examples of state-sponsored misinformation sites, sites with unclear funding or ownership that publish disinformation narratives, and other sources of misinformation.
- NewsGuard’s growing database of Misinformation Fingerprints™, a catalogue of known hoaxes, falsehoods and misinformation narratives that are spreading online. The dataset for each narrative includes a description of each hoax and why it is false, examples of stories, social media posts, videos, and other content containing the hoax, and related keywords and hashtags. Because these elements—language, hashtags, etc.—are unique to each hoax, each “fingerprint” becomes a unique identifier that can be combined with AI and social listening tools to identify the initial source of the hoax and instances in which the hoax is repeated or amplified on social networks or the open web.

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However, we know from NewsGuard’s description of its products that Reliability Ratings inform the Misinformation Fingerprints database and that there is not a firewall between the two products.<sup>271</sup>

<sup>268</sup> *Id.*

<sup>269</sup> Contract Agreement, NewsGuard Tech, Inc. and Park Capital Investment Group LLC, 9 (Nov. 2, 2020) (on file with the Comm.).

<sup>270</sup> *NewsGuard wins Pentagon-State Department contest for detecting COVID-19 misinformation and disinformation*, NEWSGUARD (Aug. 18, 2020).

<sup>271</sup> *Id.*

## b. Standalone GEC Award

NewsGuard performed additional work for the GEC in 2022 through a second Park Advisors subaward of \$50,000, which included a license to NewsGuard’s Misinformation Fingerprints program.

NewsGuard  
25 W. 52nd Street, 15th Floor  
New York, NY 10019 US  
+1 3472568188  
accounting@newsguardtech.com  
https://www.newsguardtech.com/



### INVOICE

**BILL TO**  
Park Advisors  
5001 15th St N  
Arlington, VA 22205

**INVOICE #** [REDACTED]  
**DATE** 01/10/2022  
**DUE DATE** 02/09/2022  
**TERMS** Net 30

DATE	DESCRIPTION	QTY	RATE	AMOUNT
02/01/2022	Misinformation Fingerprints	1	50,000.00	50,000.00

Wire Transfer Instructions:  
Bank Account Name: NewsGuard Technologies, Inc.  
Bank Name: City National Bank  
Bank Address: 1140 6th Avenue, New York, NY 10036  
ABA/Routing [REDACTED]  
Account [REDACTED]  
SWIFT Code: [REDACTED]

SUBTOTAL 50,000.00  
TAX 0.00  
TOTAL 50,000.00  
BALANCE DUE **USD 50,000.00**

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The project was related to “Russian disinformation narratives” circulating in Venezuelan media outlets, and sought to “test the effect and impact of overlaying NewsGuard’s content accuracy data atop existing content authenticity data generated through two separate pilots, run by Truopic and Serelay.”<sup>273</sup> The \$50,000 fee was evenly split between the two different projects with Truopic and Serelay.<sup>274</sup> Truopic and Serelay collaborated with NewsGuard to “A/B test user perception of trust in media when shown authenticity verification alone versus authenticity verification paired with NewsGuard reliability verification.”<sup>275</sup> While testing was restricted to international audiences only, it is not clear whether the media reviewed was solely international.<sup>276</sup> This question is furthered by an internal GEC slide deck discussing the results of the project, in which 44 percent of the flagged websites were hosted in the U.S.

<sup>272</sup> Misinformation Fingerprints License Agreement, NewsGuard Tech, Inc., to Park Capital Investment Group, LLC dba Park Advisors (Jan.10 2022) (on file with the Comm.).

<sup>273</sup> Contract Agreement, NewsGuard Tech, Inc. and Park Capital Investment Group LLC, 11 (Dec. 31, 2021) (on file with the Comm.).

<sup>274</sup> *Id.*

<sup>275</sup> *Id.*

<sup>276</sup> *Id.*



The GEC reportedly no longer subscribes to the Misinformation Fingerprints tool, nor does it have a present working relationship with NewsGuard to the Committee’s knowledge. The GEC cannot, however, claim that it was not involved in Park Advisors’ decision to administer the subaward to NewsGuard (as it did with the GDI); in addition to the requisite review the Federal government must complete for each subaward, the Contract Agreement states: “Park Advisors and [NewsGuard], *with significant input from the GEC*, agreed upon a fixed price amount and scope of services to be delivered as part of this contract” (emphasis added).<sup>278</sup>

### c. DOD SBIR Award

The SBIR program is known as America’s seed fund. As with most government funding opportunities, it is a highly competitive program; it encourages domestic small businesses to engage in Federal R&D that has the potential for commercialization. The SBIR program is meant to stimulate high-tech innovation while enforcing the entrepreneurial spirit essential to this country’s economy and growth. Since 2013, the SBIR program has been used to administer over 4,500 awards, supporting small businesses in all 50 states.<sup>279</sup>

Each year, Federal agencies that have extramural R&D budgets exceeding \$100 million are required to allocate a certain percentage of that budget to the SBIR program.<sup>280</sup> The SBA directs participating agencies in program administration by helping them implement the SBIR program, reviews their progress, reports annually to Congress on its operation, and aggregates agency solicitation announcement information.<sup>281</sup> The SBA also directs program policy for all participating agencies and provides program oversight.<sup>282</sup> Considering a recent theme of SBIR awards has been developing disinformation detection tools, including Meedan and NewsGuard, it is unclear whether that means the SBA has guided SBIR program policy in this direction.

<sup>277</sup> Tech Sector Outreach, Company Headlines, and TE Program Highlights, Global Engagement Center (date unknown) (on file with the Comm.).

<sup>278</sup> Contract Agreement, NewsGuard Tech, Inc. and Park Capital Investment Group LLC, 1 (Dec. 31, 2021) (on file with the Comm.).

<sup>279</sup> Eleanor Johnson, *NSF 101: America’s Seed Fund*, NATIONAL SCIENCE FOUNDATION (Nov. 2, 2023).

<sup>280</sup> FAQs, Small Business Innovation Research (SBIR) & Small Business Technology Transfer (STTR), U.S. SMALL BUS. ADMIN. (last visited Jun. 29, 2024) available at <https://www.sbir.gov/faqs>.

<sup>281</sup> *Id.*

<sup>282</sup> Eligibility Requirements, Small Business Innovation Research (SBIR) & Small Business Technology Transfer (STTR), U.S. SMALL BUS. ADMIN. (last visited Jun. 29, 2024) available at <https://www.sbir.gov/faqs/eligibility-requirements>.

There are three Phases, or categories, of SBIR awards:

- 1) Phase I: establish the technical merit, feasibility, and commercial potential of the proposed Federal Research /R&D efforts and to determine the quality of performance of the small business awardee organization prior to providing further Federal support in Phase II. Phase I awards normally do not exceed \$150,000 and have a six-month period of performance.<sup>283</sup> However, some agencies offer larger awards, such as the National Science Foundation, which administers Phase I awards of nearly \$300,000 for six to twelve months of work.<sup>284</sup>
- 2) Phase II: continues the Federal Research/R&D efforts initiated in Phase I. Funding is based on the results achieved in Phase I and the scientific and technical merit and commercial potential of the project proposed in Phase II. Generally, only Phase I awardees are eligible for a Phase II award, but as demonstrated with the NewsGuard award, there are also Direct to Phase II options. Phase II awards normally do not exceed \$1,000,000 and have a two-year period of performance.<sup>285</sup>
- 3) Phase III: The objective, where appropriate, is for the small business to pursue commercialization objectives resulting from the Phase I and Phase II Federal Research/R&D activities. The SBIR program does not fund Phase III awards. In some Federal agencies, Phase III may involve follow-on non-SBIR funded R&D or production contracts for products, processes or services intended for use by the U.S. Government.<sup>286</sup>

As NewsGuard’s SBIR award was a Direct to Phase II, the split GEC/DOD Park Advisors subaward (which NewsGuard described as a “pilot” award) seems to have served as the Phase I prerequisite to Phase II, despite not being administered under the SBIR program. This is furthered by the government’s description of the competition’s award, which would provide the winner with a “Government Contracting 101 session and SBIR crash course.”<sup>287</sup>

Recipient	NewsGuard Technologies, Inc.
FAIN	FA8649-21-P-1569
Awarding Agency	Department of Defense
Branch	Air Force
Amount	\$749,387.00
Phase	II
Award Start Date	2021-09-07
Award End Date	2022-12-08
Abstract	NewsGuard combines human intelligence with technology to enable companies, institutions, and end-users to identify, track, and avoid misinformation and disinformation online--and to find trustworthy sources from which information is likely to be accurate.

The FOIA documents available for this award are heavily redacted. The disclosed text reflects that the DOD used Misinformation Fingerprints to assess media outlets determined to be state-controlled in the following

<sup>283</sup> General Questions, Small Business Innovation Research (SBIR) & Small Business Technology Transfer (STTR), U.S. SMALL BUS. ADMIN. (last visited Jun. 29, 2024) available at <https://www.sbir.gov/faqs/general-questions>.

<sup>284</sup> Eleanor Johnson, *NSF 101: America’s Seed Fund*, NATIONAL SCIENCE FOUNDATION (Nov. 2, 2023).

<sup>285</sup> General Questions, Small Business Innovation Research (SBIR) & Small Business Technology Transfer (STTR), U.S. SMALL BUS. ADMIN. (last visited Jun. 29, 2024) available at <https://www.sbir.gov/faqs/general-questions>.

<sup>286</sup> *Id.*

<sup>287</sup> NSIN Challenge – Countering COVID19 Disinformation, NATIONAL SECURITY INNOVATION NETWORK (last visited Jul. 21, 2024) available at <https://nsin.mil/events/disinfo-challenge/>.

ally markets: Australia, Canada, Germany, France, Italy, New Zealand, and the U.K.<sup>288</sup>

The Work Plan called for NewsGuard to conduct outreach to DOD’s partners with AI/machine learning or social listening technology in order to integrate Misinformation Fingerprints into those partners’ programs.<sup>289</sup> It is not clear who these partners were.

The following facts evidence that the SBIR award was used to further develop the Misinformation Fingerprints program, and that this is a government funding relationship, despite NewsGuard’s assertion otherwise:

- 1) The last of the award deliverables was to determine SBIR Phase III (commercialization) viability, demonstrating growth from Phase II status.<sup>290</sup>
- 2) NewsGuard described its “work for the Pentagon’s Cyber Command;” doing “work” for the government is not simply providing the government with access to existing proprietary data.<sup>291</sup>
- 3) Awardees of SBIR funds own, and have full right and title to, the data they develop under a SBIR award.<sup>292</sup>
- 4) The award deliverable to develop a new field for example links to extract specific language from outlets that contain the “myth narrative.”<sup>293</sup>
- 5) NewsGuard’s own framing of the award in its *2021 Social Impact Report* indicated that the grant would be used to “further develop” the Misinformation Fingerprints program).<sup>294</sup>
- 6) The following email in which NewsGuard staff asserts the award would be used to “enhance” Misinformation Fingerprints.

From: Matt Skibinski <matt.skibinski@newsguardtech.com>  
Sent: Tuesday, August 3, 2021 9:00 PM  
To: [REDACTED]  
Cc: Harmony Keeney <harmony.keeney@newsguardtech.com>  
Subject: Re: FW: [Non-DoD Source] Re: FW: Contract Specialist Assigned - Proposal F2D-2958

Thank you for the note and please forgive our relative ignorance when it comes to the data rights forms and how these kinds of things typically work

As some context: Our SBIR proposal is primarily centered around adapting and enhancing one of our current products, which we term Misinformation Fingerprints, to meet AF end user needs and use cases. The Misinformation Fingerprints product includes a set of proprietary data that we collect and create about known misinformation narratives spreading in digital environments, as well as software (API + dashboard) that allows end-users to access that data

The primary data we're asserting rights to is that dataset – the Misinformation Fingerprints data, which is a dataset of information about false claims / misinformation narratives spreading digitally

Both the data and the software can be acquired via a licensing agreement, though there is no need to sign such an agreement at this stage unless it is necessary. We had assumed that we would share any necessary data and software to key stakeholders as needed throughout the project even while we retain rights to it long-term. However, please let us know if this approach is not tenable or if there are other requirements we need to adhere to here

Best regards,

Matt

—  
Matt Skibinski  
General Manager  
[NewsGuard Technologies](https://www.newsguardtechnologies.com)  
*Restoring Trust & Accountability*  
[matt.skibinski@newsguardtech.com](mailto:matt.skibinski@newsguardtech.com)  
Twitter: [@NewsGuardRating](https://twitter.com/NewsGuardRating) // [@mskibinski](https://twitter.com/mskibinski)  
[NewsGuard: The Internet Trust Tool](https://www.newsguardtechnologies.com)  
+1 973 818 4698

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The SBIR program has been a key tool for small businesses to access Federal resources to develop their products. The program has distributed funds to small businesses for purposes that span from advancing research on

<sup>288</sup> Phase II Work-Plan, FOIA of NewsGuard SBIR Award (Sep. 7, 2021) (on file with the Comm.).

<sup>289</sup> *Id.*

<sup>290</sup> *Id.*

<sup>291</sup> Email from Gordon Crovitz, NewsGuard, Co-CEO, to Matt Taibbi, RacketNews, Investigative Journalist (Mar. 10, 2023).

<sup>292</sup> Data Rights, Small Business Innovation Research (SBIR) & Small Business Technology Transfer (STTR), U.S. SMALL BUS. ADMIN. (last visited Jun. 29, 2024) *available at* <https://www.sbir.gov/faqs/data-rights>.

<sup>293</sup> Solicitation/Contract/Order for Commercial Items, FOIA of NewsGuard SBIR Award (Sep. 7, 2021) (on file with the Comm.).

<sup>294</sup> *Social Impact Report 2021*, NEWSGUARD, 37 (Jan. 2022).

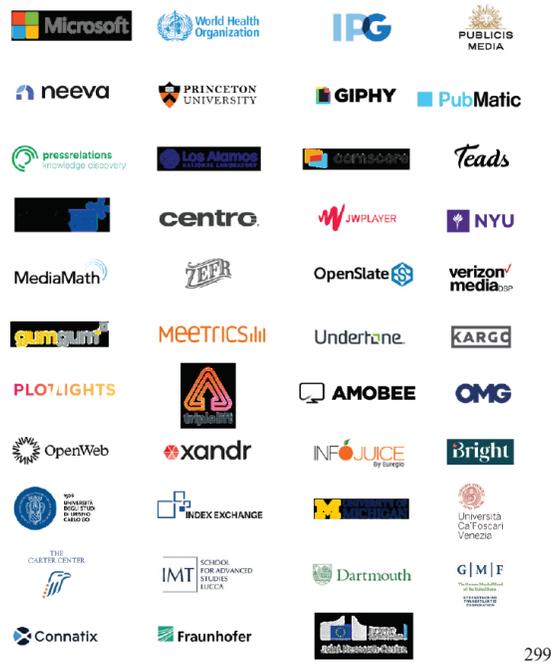
<sup>295</sup> Email from Matt Skibinski, General Manager, NewsGuard, to U.S. Dep’t of Defense (Aug. 3, 2021) (on file with the Comm.).

Alzheimer’s Disease to hypersonic turbulence modeling to monitoring for maritime search and rescue. The lasers for Lasik eye surgery were developed using the SBIR program. However, over the last several years, the SBIR program has also been leveraged to grow technology that surveils speech, ultimately used for the suppression and censorship of that speech- with NewsGuard, this also applies to the press.

**iv. Partnerships**

NewsGuard’s partnership with State and the DOD was announced in August of 2020.<sup>296</sup> By the end of 2021, NewsGuard had partnerships with more than 50 companies and organizations and more than 800 public libraries.<sup>297</sup> Their partners included search engines, social media platforms, global health agencies (including the WHO), advertisers, news aggregators, media monitoring and reputation management companies, universities, the U.S. government (including the Center for Disease Control and the Office of the Surgeon General), and schools.<sup>298</sup>

**THANK YOU  
TO NEWSGUARD'S PARTNERS**



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NewsGuard’s 2021 partnership with Microsoft made its Nutrition Label ratings technology available to millions of internet users.<sup>300</sup> It was a three-year agreement applying to many of its divisions, including Bing, Microsoft News (MSN, a news aggregator), the Edge browser, Microsoft’s education and research departments, and Microsoft’s Democracy Forward program.<sup>301</sup> This partnership was promoted by the Disinfo Cloud Twitter account.<sup>302</sup>

By this time, NewsGuard had partnered with three of the top five global advertising agencies and five

<sup>296</sup> *NewsGuard wins Pentagon-State Department contest for detecting COVID-19 misinformation and disinformation*, NEWSGUARD (Aug. 18, 2020).

<sup>297</sup> *Social Impact Report 2021*, NEWSGUARD, 2 (Jan. 2022).

<sup>298</sup> *Id.*

<sup>299</sup> *Id.* at 42.

<sup>300</sup> *Id.* at 2.

<sup>301</sup> Kate O’Sullivan, Microsoft’s General Manager of Digital Diplomacy, s on NewsGuard’s Global Advisory Board; *Advisory Board*, NEWSGUARD (last visited Aug. 15, 2024).

<sup>302</sup> Disinfo Cloud (@DisinfoCloud) reposting NewsGuard (@NewsGuardRating), Twitter (now X) (Jun. 14, 2021, 11:36 PM) available at <https://x.com/newsguardrating/status/1404477925228007430?s=10&t=u8hEK0zejJhIrlj8PBhzuqw>.

of the top ten ad exchanges, which resulted in advertisers divesting from NewsGuard’s chosen “misinformation economy,” and redirecting that ad spend to outlets NewsGuard deemed trustworthy.<sup>303</sup> It had signed partnerships with three of the top six advertising holding companies, representing more than 100 agencies.<sup>304</sup> NewsGuard’s reliability ratings influenced thousands of ad buys.<sup>305</sup>

NewsGuard secured partnerships that spread the use of its ratings beyond programmatic display advertising on news and information sites to also cover advertising on YouTube, extending its reach to social media monetization.<sup>306</sup> By partnering with Zefr, a “brand safety” technology company used by YouTube, NewsGuard was able to influence brands to target their YouTube ads to sources on the platform NewsGuard deemed credible.<sup>307</sup>

During the pandemic, the WHO enlisted NewsGuard for its input, including regular reports, on which COVID-19 narratives it determined to be misinformation were prevalent online.<sup>308</sup> This included information about the virus itself, the vaccines, and treatments. The WHO then contacted social media companies and search engines asking them to remove this content.<sup>309</sup>

By the end of 2022, NewsGuard had secured significantly more partnerships.<sup>310</sup> Through its relationship with IPG Mediabrands, NewsGuard expanded its ratings system to 140 cable and streaming TV shows and networks.<sup>311</sup> This partnership was also promoted by Disinfo Cloud’s Twitter account, along with an article discussing how IPG Mediabrands provided its clients with discounted rates for using NewsGuard’s data and recommended only networks scoring 85 or higher on NewsGuard’s scale.<sup>312</sup> Mediabrands entities UM, Initiative, and MAGNA worked together on the deal.<sup>313</sup> Other partnerships were secured with ad-tech platforms such as Media.net, Unruly, and Magnite. NewsGuard launched its Responsible News Private Marketplace with Pubmatic, which provided brands with the ability to buy inventory for more than 3,000 news sites they deemed credible.<sup>314</sup>

By the end of 2023, NewsGuard’s had secured significantly more clients and partnerships:

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<sup>303</sup> *Social Impact Report 2021*, NEWSGUARD, 2 (Jan. 2022).

<sup>304</sup> *Id.* at 20.

<sup>305</sup> *Id.*

<sup>306</sup> *Id.* at 26.

<sup>307</sup> *Id.*

<sup>308</sup> *Id.* at 7.

<sup>309</sup> *Id.* at 4.

<sup>310</sup> *Social Impact Report 2022*, NEWSGUARD, 15 (Jan. 2023).

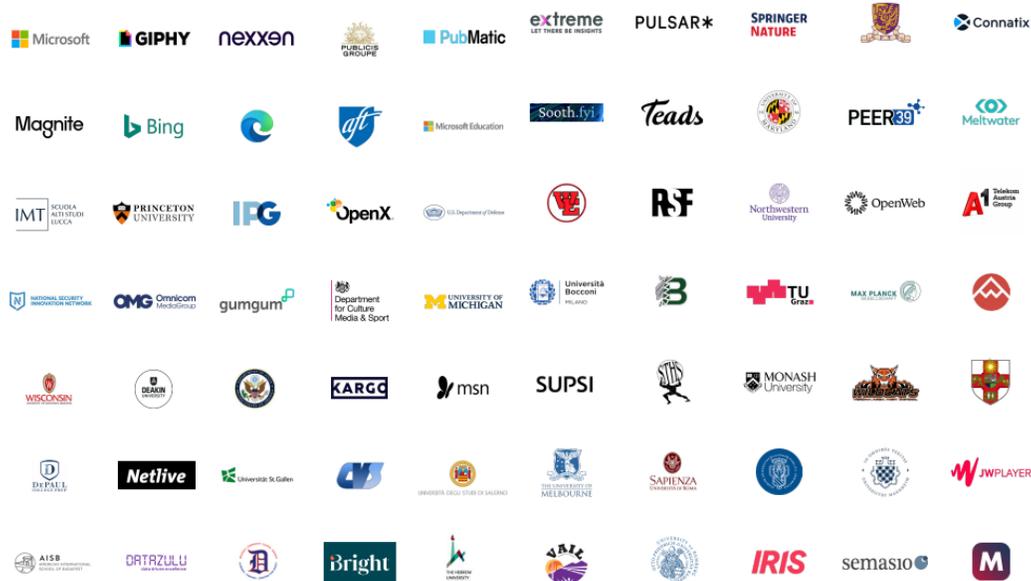
<sup>311</sup> *Id.* at 10.

<sup>312</sup> Disinfo Cloud (@DisinfoCloud) reposting NewsGuard (@NewsGuardRating), Twitter (now X) (Dec. 2, 2021, 10:02 AM) available at <https://x.com/newsguardrating/status/1466422604810670092?s=10&t=u8hEK0zejJhIrj8PBhzuqw>; *IPG Mediabrands Strikes Exclusive Deal with NewsGuard to Go Beyond Website Ratings to Rate Individual Cable and Broadcast TV News Shows*, NEWSGUARD (Dec. 2, 2021).

<sup>313</sup> *IPG Mediabrands Strikes Exclusive Deal with NewsGuard to Go Beyond Website Ratings to Rate Individual Cable and Broadcast TV News Shows*, NEWSGUARD (Dec. 2, 2021).

<sup>314</sup> *Social Impact Report 2022*, NEWSGUARD, 10 (Jan. 2023).

## Our Clients



## Our Clients



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NewsGuard now leverages relationships with Meltwater, PeakMetrics, and Pulsar to “help brands safeguard their reputations” online.<sup>316</sup> Its data supports media monitoring, public relations, social listening, and reputation management companies advise clients about the “quality and trustworthiness” of websites and social media channels the companies appear on.<sup>317</sup>

While more transparent than the GDI, NewsGuard’s reach is far more significant in impact and scope. Running afoul of its rating system or refusing to implement the reforms NewsGuard demands in order to raise scores has marked effects on a businesses’ reputation, circulation, revenue, and overall operations. This is especially harmful to small businesses that cannot survive such impediments to growth. That advertising organizations were encouraging their members to use NewsGuard (and GDI) may have antitrust implications, as demonstrated by the House Judiciary Committee.<sup>318</sup> Those agreements among the private sector to drive revenue away from disfavored press, combined with the backing of the Federal government, is an unacceptable interference in the free marketplace of ideas. The Federal government cannot, in any way, be involved in this space.

<sup>315</sup> *Social Impact Report 2023*, NEWSGUARD, 21-23 (Jan. 2024).

<sup>316</sup> *Id.* at 17.

<sup>317</sup> *Id.*

<sup>318</sup> H. COMM. ON THE JUDICIARY, GARM’S HARM: HOW THE WORLD’S BIGGEST BRANDS SEEK TO CONTROL ONLINE SPEECH (Jul. 10, 2024).

## V. Recommendations

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### 1. Investigation into Other GEC Awards

The Committee has received only a fraction of the documents it requested and subpoenaed from the GEC and therefore has not performed a thorough review of suspect grants. The GEC awards discussed in this report are not the only ones at issue. Some award recipients, such as Albany Associates International and the Atlantic Council and its DFRLab, have been examined in depth by other Congressional committees and investigative journalists; most have not been thoroughly reviewed. There is much more to learn and transparency is in short supply. Further inspection should be carried out into GEC awardees, beginning with those with known domestic impacts.

### 2. Audit of GEC Award Records and State Records Writ Large

Throughout this investigation it became clear that the GEC has several issues in its recordkeeping and that there are not sufficient audit procedures in place to efficiently track its use of taxpayer dollars. The following issues were present in the subaward records alone: (1) categories were provided for several recipients rather than specific organizations or individuals, such as \$240,136 for “Radio Programmes” and \$42,600 for “On-Air Discussion;” (2) in six instances, subawardees were just the first names of individuals; (3) in one instance the field denoted “Report mentions subpartners; unable to find details;” and (4) it appears at least one subaward was omitted, as only one Park Advisors subaward to NewsGuard is shown for \$50,000, and there are two known Park Advisors subawards to NewsGuard, the other for \$25,000.

Despite State’s claims that it conducts rigorous oversight of subawardees, the GEC’s records indicate that there are numerous subawardees for which State has little or no information. Fears of a more widespread issue are exacerbated by the July 2024 Special Inspector General report which found that USAID could not demonstrate compliance with its award requirements for at least \$239 million in taxpayer dollars distributed in Afghanistan, some of which may have been funneled to the Taliban.<sup>319</sup> Though an independent Federal government agency, USAID receives overall policy guidance from the Secretary of State.

In its analysis of the GEC’s productions, the Committee found ten publicly available GEC direct awards that were not disclosed. After nearly one year of discussion with State, in which it failed to offer an explanation or perform internal due diligence to resolve the discrepancy, State realized that these ten awards were mistakes; each was improperly logged as a GEC award by various embassies. Suffice it to say that it should not fall to the Committee on Small Business to catch errors in the Department of State’s record keeping. If, as State told the Committee on December 19, 2023, these award numbers are “tracked and used for reporting,” there are not audits or procedures in place sufficient to catch these errors.<sup>320</sup> If this Committee’s narrow review of recent GEC awards alone found ten errors, it is reasonable to conclude similar errors exist department-wide.

There needs to be more efficient auditing of taxpayer dollars that are given away. A complete review of State’s awards, at all levels, is needed to ensure taxpayer dollars are being used for their proper and intended purpose, and granted to the intended awardee, with proper documentation.

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<sup>319</sup> SPECIAL INSPECTOR GEN. FOR AFGHANISTAN RECONSTRUCTION, SIGAR 24-29-FA, USAID’S AFGHANISTAN CONFLICT MITIGATION ASSISTANCE FOR CIVILIANS PROGRAM: AUDIT OF COSTS INCURRED BY BLUMONT GLOBAL DEVELOPMENT, INC. (Jun. 2024).

<sup>320</sup> Email from Molly Clafin, Special Counsel, U.S. Dep’t of State, to Stephanie Chambless, Counsel, H. Comm. on Small Bus (Dec. 19, 2023).

### 3. SBIR Program Reforms

The SBIR program is America's seed fund and should not be used to grow companies (like Meedan) that surveil the speech of American citizens or those (like NewsGuard) that seek to demonetize domestic press. The Committee remains concerned about this direction of the SBIR program, and whether the SBA, as the agency in charge of directing program policy, has had anything to do with this shift in award theme. The SBIR program is due for reauthorization in FY 2025. Guardrails should be put in place to prevent these types of companies from receiving taxpayer dollars and to facilitate effective oversight and greater transparency into the SBIR program.

Further, the May 2024 report on the origins and development of the GEC states that in 2016 the SBA was part of the GEC's Steering Committee.<sup>321</sup> It is not clear whether this relationship still exists. Between the SBA's role administering the SBIR program and the GEC's disinformation-oriented awards, the link between the SBA and the GEC is suspect. The Committee seeks greater transparency on the relationship between the SBA and GEC.

### 4. Oversight of the NED

The NED's use of taxpayer dollars is suspect and should undergo Congressional oversight and review as permitted by the National Endowment for Democracy Act. The NED was appropriated approximately \$300 million from the government in FY 2022.<sup>322</sup> This is not a small amount of money, and when a supposedly bipartisan organization with international restrictions has staff using their NED email to discuss the legitimacy of domestic press outlets, combined with funding of organizations like the GDI, it is indicative of rot.

### 5. Legislation

No Federal funds should be used to grow companies whose operations are designed to demonetize and interfere with the domestic press. Though the government is no longer in a relationship with NewsGuard or the GDI, the damage has already been done—they have already received the backing of the Federal government in hosting their products on the GEC's Testbed and recommending them to its partners, using their services, and helping to grow their products. The only real change the Federal government could be involved in moving forward would be to restrict future Federal funding to them and companies with similar operations. Congress should also explore the impacts of cutting off Federal funding to entities who use these products.

Further, the DOD should not be outsourcing their perception of fact to speech-police organizations subject to partisan bias. For this reason, Chairman Williams introduced an amendment to the FY 2025 NDAA to block such funding, which passed the House with a unanimous Republican vote, despite every single Democrat voting 'no.'<sup>323</sup> Members, Committees, and their staff must remain diligent about government programs and contracts which threaten to undermine the First Amendment rights of Americans and domestic press.

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<sup>321</sup> *The Global Engagement Center: A Historical Overview 2001-2021*, U.S. ADVISORY COMM'N ON PUBLIC DIPLOMACY, 28 (May 2024).

<sup>322</sup> *Financial Report*, NATIONAL ENDOWMENT FOR DEMOCRACY (Sep. 30, 2022).

<sup>323</sup> Amendment to Rules Committee Print 118-36, Offered by Roger Williams (Jun. 6, 2024) *available at* [https://amendments-rules.house.gov/amendments/WILLTX\\_062\\_xml240607115518651.pdf](https://amendments-rules.house.gov/amendments/WILLTX_062_xml240607115518651.pdf).

## VI. Conclusion

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The collaboration between the public and private sector to moderate certain content impacts not only the First Amendment rights of individuals, but the ability of businesses to compete in a free marketplace. This interference is especially harmful to small businesses, which need to be able to freely utilize all available avenues for growth. The ability to leverage various internet platforms is essential for competition in the modern marketplace. This manner of government interference results not only in economic harms, but also brushes up against foundational, Constitutional principles.

In the dissent for *Murthy v. Missouri*, Justice Alito describes the difference in vulnerability to government pressure between social media platforms and news sources. He explains that social media companies are critically dependent on the protection provided by §230 of the Communications Decency Act of 1996 and are susceptible to antitrust lawsuits, and are therefore far more vulnerable to government pressure.<sup>324</sup> He argues that “[i]f a President dislikes a particular newspaper, he (fortunately) lacks the ability to put the paper out of business.”<sup>325</sup> This is meant to be an assurance, but with the Federal government supporting and promoting companies whose products aim to demonetize news outlets and disrupt their operations because of their lawful speech, this claim is not necessarily true.

Taxpayer dollars and other Federal support should not be given to organizations who police lawful speech and punish domestic press noncompliance with their standards and points of view. Press rating systems are inherently flawed as they are subject to the partisan lens of the assessor. News and information businesses must be able to compete online in a free and fair marketplace without having to conform to narratives pushed by government-backed ratings organizations for fear of losing advertising revenue. It is extremely concerning that such organizations, in addition to hundreds of products that surveil internet speech and decide what is truth, were given government platforms and Federal funding to grow and promoted directly to the social media companies in charge of moderating online speech. It is similarly concerning that this technology was promoted to foreign governments with significant internet speech regulations and to Federal agencies without international restrictions and whose coordination with social media is suspect at best.

Inaccurately painting speech as false has become a dangerous recurring theme. MDM labels are being weaponized against dissident narratives. Speech is being framed as true or false often on a partisan, rather than factual, basis. While actual false information certainly can inflict harm, the solution should not be to censor it, but to combat it with correct information. Open dialogue is necessary to resolve complex issues. The elimination of dissenting voices is not the solution. As George Washington famously said:

*“For if men are to be precluded from offering their sentiments on a matter, which may involve the most serious and alarming consequences [...] the freedom of speech may be taken away- and, dumb and silent we may be led, like sheep to the slaughter.”*<sup>326</sup>

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<sup>324</sup> *Murthy, et al. v. Missouri, et al.*, 603 U.S. 39 (2024) (Alito, J., dissenting).

<sup>325</sup> *Id.*

<sup>326</sup> George Washington, The Newburgh Address (Mar. 15, 1783).

## VII. Appendix

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### Before FY 2019 (pre- 9/30/2018)

- 4/2007: Counterterrorism Communication Center (CTCC) (first precursor to the GEC) established
- 2008: CTCC rebranded as the Global Strategic Engagement Center (GSEC)
- 1/20/2009: Barack Obama sworn into office
- 9/2010: Center for Strategic Counterterrorism Communication (CSCC) replaces the GSEC
- 9/9/2011: EO 13584 officially establishes the CSCC with a mission and mandate<sup>327</sup>
- 1/2016: Obama White House announces creation of the GEC to replace the CSCC
- 3/14/2016: EO 13721 establishes the GEC and its multi-agency Steering Committee
- 12/23/2016: FY 2017 NDAA signed into law, expanding the GEC’s mission by giving it the authority to address other foreign propaganda and disinformation operations
- 1/20/2017: Donald Trump sworn into office
- 2/23/2018: Funds transferred from the DOD to the GEC for initiatives to counter propaganda and disinformation from foreign nations; included creation of the IAF
- 8/13/2018: FY 2019 NDAA signed into law, further expanding GEC’s scope of work, endowing it with a mandate, as reflected in its current mission statement<sup>328</sup>
- 9/25/2018: Start date of Park Advisors GEC award

### FY 2019 (10/1/2018 – 9/30/2019)

- 11/26/2018: CISA established within DHS

### FY 2020 (10/1/2019 – 9/30/2020)

- 7/1/2020: Start date of first NED GDI award

### FY 2021 (10/1/2020 – 9/30/2021)

- 11/2/2020: Contract signed for GEC/DOD split GDI award
- 1/20/2021: Joe Biden sworn into office
- 7/1/2021: Meedan SBIR Award Start Date
- 7/31/2021: Applications close for U.S.-Paris Tech Challenge
- 9/7/2021: Newsguard SBIR award Start Date

### FY 2022 (10/1/2021 – 9/30/2022)

- 12/31/2021: Contract signed for GEC-standalone GDI award
- 12/31/2021: End date of Park Advisors GEC award
- 4/14/2022: Elon Musk buys Twitter
- 9/2022: State’s OIG found GEC not properly overseeing contractors to ensure they do not perform “inherently governmental functions”<sup>329</sup>

### FY 2023 (10/1/2022 – 9/30/2023)

- 10/1/2022: Start date of final NED GDI award

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<sup>327</sup> Exec. Order No. 13584, Developing an Integrated Strategic Counterterrorism Communications Initiative, 76 Fed. Reg. 56945 (Sep. 9, 2011).

<sup>328</sup> *John S. McCain National Defense Authorization Act for Fiscal Year 2019*, Pub. L. No. 115-232, § 1284, 132 Stat. 1636 (2018) available at <https://www.congress.gov/bill/115th-congress/house-bill/5515/text>.

<sup>329</sup> U.S. DEPT. OF STATE, OFFICE OF THE INSPECTOR GEN., ISP-I-22-15, INSPECTION OF THE GLOBAL ENGAGEMENT CENTER (Sep. 2022).

- 10/21/2022: GDI releases list of 10 riskiest/10 least risky American media outlets
- 12/3/2022: First installment of the *Twitter Files* released
- 12/16/2022: GDI publishes report of riskiest American media outlets
- 2/17/2023: NED terminates all GDI awards
- 3/2/2023: Date of 2023.02.14 GEC-GDI-BLACKLIST.docx
- 3/2/2023: *Twitter Files* on the GEC released (#17)
- 3/9/2023: First Weaponization subcommittee hearing with *Twitter Files* authors Matt Taibbi and Michael Shellenberger as witnesses
- 3/10/2023: Newsguard emails Matt Taibbi to dispute the “government funded” categorization
- 6/7/2023: HCSB Letter 1 to GEC
- 7/24/2023: Second HCSB Letter 2 to GEC

FY 2024 (10/1/2023 – present)

- 11/30/2023: Second Weaponization hearing with Matt Taibbi & Michael Shellenberger
- 12/3/2023: State Production 1 listing direct awardees FY 2019 – FY 2023
- 12/6/2023: State of Texas/*The Federalist*/*The Daily Wire* file suit against State/GEC
- 12/19/2023: *In-Camera* review of Production 1
- 1/8/2024: HCSB Letter 3 to GEC
- 2/14/2024: GEC Letter to HCSB re: disclosure
- 2/16/2024: HCSB Letter 4 to GEC
- 3/21/2024: HFAC Subcommittee hearing on oversight of the GEC
- 3/28/2024: State Production 2 listing subawardees FY 2018 – FY 2023
- 4/9/2024: Briefing with GEC grant officers and grant officer representatives
- 5/2/2024: *In-Camera* review of Production 2
- 5/16/2024: HCSB Letter 5 to GEC
- 5/20/2024: GEC responds to Rep. Beth Van Duyne HFAC QFRs
- 6/13/2024: HCSB issues subpoena to State
- 6/14/2024: GEC responds to questions about Federal Acquisition Identification Numbers
- 6/26/2024: HCSB GEC/Censorship hearing
- 6/27/2024: GEC produces 2023.02.14 GEC-GDI-BLACKLIST.docx
- 7/24/2024: Judiciary report on GARM and possible antitrust violations
- 8/8/2024: GEC produces information on DT Institute
- 8/27/2024: GEC produces information on GLOBSEC and East-West Center

<b>Organization</b>	<b>Abbreviation</b>
Atlantic Council’s Digital Research Forensics Lab	DFRLab
Application Programming Interface	API
Censorship-Industrial Complex	CIC
Center for Disease Control	CDC
Central Intelligence Agency	CIA
Congressional Research Service	CRS
Counterterrorism Communication Center	CTCC
Counter propaganda and disinformation	CPD
Cybersecurity and Infrastructure Security Agency	CISA
Center for Strategic Counterterrorism Communications	CSCC
Department of Defense	DOD
Department of Homeland Security	DHS
Department of Justice	DOJ
Department of State	State
East-West Center	EWC
Executive Order	EO
Federal Award Identification Number	FAIN
Federal Bureau of Investigation	FBI
Fiscal Year	FY
Freedom of Information Act	FOIA
Global Alliance for Responsible Media	GARM
Global Disinformation Index	GDI
Global Disinformation Index’s Dynamic Exclusion List	DEL
Global Engagement Center	GEC
Global Strategic Engagement Center	GSEC
House Committee on the Judiciary	Judiciary or HCJ
House Committee on the Judiciary, Subcommittee on the Weaponization of the Federal Government	Weaponization
House Committee on Small Business	Committee or HCSB
House Foreign Affairs Committee	HFAC
Information Access Fund	IAF
Institute for War & Peace Reporting	IWPR
Letter from HCSB to GEC on June 7, 2023	Letter 1
Letter from HCSB to GEC on July 24, 2023	Letter 2
Letter from HCSB to GEC on January 28, 2024	Letter 3
Letter from HCSB to GEC on February 16, 2024	Letter 4
Letter from HCSB to GEC on May 16, 2024	Letter 5
Misinformation, Disinformation, and Malinformation	MDM
National Defense Authorization Act	NDAAs
National Endowment for Democracy	NED

National Science Foundation	NSF
New York Times	NYT
Nongovernmental organization	NGO
North Atlantic Treaty Organization	NATO
Office of the Director of National Intelligence	ODNI
Poynter’s International Fact-Checking Network	IFCN
Production from the GEC to HCSB on December 3, 2023	Production 1
Production from the GEC to HCSB on March 28, 2024	Production 2
Research & Development	R&D
Small Business Administration	SBA
Small Business Innovation & Research program	SBIR
Software-as-a-Service	SaaS
Technology Engagement Team	TET
Terms of Service	TOS
Twitter (now X)	Twitter <sup>330</sup>
Questions for the Record	QFR
U.K. Foreign Commonwealth, and Development Office	U.K. FDCO
U.S. Agency for International Development	USAID
World Health Organization	WHO

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<sup>330</sup> As the majority of the events in this report took place prior to Twitter’s rebranding as X, that platform is referred to as Twitter throughout this report.