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6 ALLIANCE OF LOS ANGELES COUNTY PARENTS

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **FOR THE COUNTY OF LOS ANGELES**

9 ALLIANCE OF LOS ANGELES COUNTY  
10 PARENTS, an unincorporated association

11 Petitioner and Plaintiff,

12 vs.

13 COUNTY OF LOS ANGELES DEPARTMENT  
14 OF PUBLIC HEALTH; MUNTU DAVIS, in his  
15 official capacity as Health Officer for the County  
16 of Los Angeles; BARBARA FERRER, in her  
17 official capacity as Director of the County of Los  
18 Angeles Department of Public Health; and DOES  
19 1 through 25, inclusive,

20 Respondents and Defendants.  
21

Case No.: 22STCP02772

**ALLIANCE OF LOS ANGELES COUNTY  
PARENTS' COMPENDIUM OF  
EXHIBITS IN SUPPORT OF  
OPPOSITION TO DEFENDANTS'  
MOTION FOR SUMMARY JUDGMENT**

HEARING DATE: September 1, 2023

TIME: 9:30 a.m.

DEPT: 69

JUDGE: William F. Fahey

COMPLAINT FILED: July 26, 2022

TRIAL DATE: October 16, 2023

**COMPENDIUM OF EXHIBITS IN SUPPORT OF ALLIANCE OF LOS ANGELES  
COUNTY PARENTS' BRIEF IN OPPOSITION TO DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

<b>Exh. No.</b>	<b>Description of Exhibit</b>	<b>Comp. Exh. Page #</b>	<b>Doc refs.</b>
<b>Exh. 1</b>	Transcript of excerpts from July 7, 2022 Public Health Virtual Media Briefing. Video available at <a href="https://www.youtube.com/watch?v=DJ4M8cfNi6g&amp;t=278s">https://www.youtube.com/watch?v=DJ4M8cfNi6g&amp;t=278s</a> ; last visited July 30, 2023.	<b>002- 003</b>	<b>RJN, HAMILL DECL.</b>
<b>Exh. 2</b>	Transcript of excerpts from July 13, 2022 LAC+USC Virtual Town Hall Meeting - LAC+USC Medical Center Video available at: <a href="https://www.youtube.com/watch?app=desktop&amp;v=_fGuA-nU7EI&amp;t=469s">https://www.youtube.com/watch?app=desktop&amp;v=_fGuA-nU7EI&amp;t=469s</a> ; last visited July 24, 2023.	<b>005</b>	<b>RJN, HAMILL DECL.</b>
<b>Exh. 3</b>	Transcript of excerpts from July 14, 2022 Public Health Virtual Media Briefing. Video available at <a href="https://www.youtube.com/watch?v=uzHGjm8FIOs">https://www.youtube.com/watch?v=uzHGjm8FIOs</a> ; last visited July 24, 2023.	<b>007</b>	<b>RJN, HAMILL DECL.</b>
<b>Exh. 4</b>	July 19, 2022 Internal Memorandum from Liza E. Frias, Director of Environmental Health, asking employees to sign up for overtime shifts in anticipation of the reinstatement of the indoor mask mandate on Friday, July 29, 2022..	<b>009</b>	<b>RJN, HAMILL DECL.</b>
<b>Exh. 5</b>	January 31, 2018 Letter from Congressman Adam Schiff and Senator Dianne Feinstein to Twitter and Facebook, available at <a href="https://www.feinstein.senate.gov/public/_cache/files/f/3/f">https://www.feinstein.senate.gov/public/_cache/files/f/3/f</a>	<b>011- 013</b>	<b>RJN, HAMILL DECL.</b>

1		36602e9-c8b1-40bd-8a96-		
2		c16132f46c52/7F053B22AA13FB07E55F4BE903018FF		
3		7.2018-1-31-feinstein-schiff-letter.pdf; last visited July		
4		31, 2023.		
5	<b>Exh. 6:</b>	Excerpts from Transcript of June 13, 2019 hearing of	<b>015-</b>	<b>RJN,</b>
6		House Permanent Select Committee on Intelligence.	<b>020</b>	<b>HAMILL</b>
7		Retrieved from <a href="https://www.congress.gov/event/116th-congress/house-event/109620">https://www.congress.gov/event/116th-</a>		<b>DECL.</b>
8		<a href="https://www.congress.gov/event/116th-congress/house-event/109620">congress/house-event/109620</a> ; last visited July 31, 2023.		
9	<b>Exh. 7</b>	Statement of Chairman Schiff testimony from June 13,	<b>022-</b>	<b>RJN,</b>
10		2019 House Permanent Select Committee on Intelligence	<b>027</b>	<b>HAMILL</b>
11		hearing. Retrieved from:		<b>DECL.</b>
12		<a href="https://www.congress.gov/116/meeting/house/109620/documents/HHRG-116-IG00-MState-S001150-20190613.pdf">https://www.congress.gov/116/meeting/house/109620/do-</a>		
13		<a href="https://www.congress.gov/116/meeting/house/109620/documents/HHRG-116-IG00-MState-S001150-20190613.pdf">cuments/HHRG-116-IG00-MState-S001150-</a>		
14		<a href="https://www.congress.gov/116/meeting/house/109620/documents/HHRG-116-IG00-MState-S001150-20190613.pdf">20190613.pdf</a> ; last visited July 31, 2023.		
15	<b>Exh. 8</b>	Transcript of April 27, 2021 testimony of Lauren	<b>029-</b>	<b>RJN,</b>
16		Culbertson, Head of U.S. Public Policy for Twitter, Inc.	<b>032</b>	<b>HAMILL</b>
17		to Senate Judiciary Committee, retrieved from:		<b>DECL.</b>
18		<a href="https://www.judiciary.senate.gov/download/lauren-culbertson-testimony">https://www.judiciary.senate.gov/download/lauren-</a>		
19		<a href="https://www.judiciary.senate.gov/download/lauren-culbertson-testimony">culbertson-testimony</a> ; last visited July 31, 2023.		
20	<b>Exh. 9</b>	April 29, 2020 Letter from Congressman Adam Schiff to	<b>034-</b>	<b>RJN,</b>
21		Twitter. Retrieved from:	<b>035</b>	<b>HAMILL</b>
22		<a href="https://schiff.house.gov/imo/media/doc/20200429toTwitterrecoronavirusmisinformation.pdf">https://schiff.house.gov/imo/media/doc/20200429toTwitt-</a>		<b>DECL.</b>
23		<a href="https://schiff.house.gov/imo/media/doc/20200429toTwitterrecoronavirusmisinformation.pdf">errecoronavirusmisinformation.pdf</a> ; last visited July 31,		
24		2023.		
25	<b>Exh. 10</b>	December 8, 2022 Schiff Letter to Twitter, retrieved	<b>037-</b>	<b>RJN,</b>
26		from <a href="https://schiff.house.gov/news/press-releases/schiff-takano-call-on-elon-musk-to-tamp-down-hate-speech-on-twitter">https://schiff.house.gov/news/press-releases/schiff-</a>	<b>039</b>	<b>HAMILL</b>
27		<a href="https://schiff.house.gov/news/press-releases/schiff-takano-call-on-elon-musk-to-tamp-down-hate-speech-on-twitter">takano-call-on-elon-musk-to-tamp-down-hate-speech-on-</a>		<b>DECL.</b>
28		<a href="https://schiff.house.gov/news/press-releases/schiff-takano-call-on-elon-musk-to-tamp-down-hate-speech-on-twitter">twitter</a> ; last visited July 31, 2023.		

1	<b>Exh. 11</b>	Email to LACDPH Counsel Regarding Missing Timeline Posts.	<b>041</b>	<b>HAMILL DECL.</b>
2				
3	<b>Exh. 12</b>	Deposition of Brett Morrow Excerpts and Exhibits	<b>043-</b>	<b>HAMILL</b>
4			<b>120</b>	<b>DECL.</b>
5	<b>Exh. 13</b>	Deposition of Barbara Ferrer Excerpts and Exhibits	<b>122-</b>	<b>HAMILL</b>
6			<b>137</b>	<b>DECL.</b>
7	<b>Exh. 14</b>	August 9, 2023 screenshot from LACDPH Twitter timeline showing anyone mentioned by LACDPH may reply.	<b>139</b>	<b>HAMILL DECL.</b>
8				
9				
10	<b>Exh. 15</b>	Los Angeles County Department of Public Health Facebook page review section as of August 14, 2023.	<b>141</b>	<b>HAMILL DECL.</b>
11				
12	<b>Exh. 16</b>	E-mails exchanged with counsel for X Corp., formerly known as Twitter, regarding subpoena response.	<b>143-</b>	<b>HAMILL</b>
13			<b>163</b>	<b>DECL.</b>
14	<b>Exh. 17</b>	E-mails exchanged with Sal Rodriguez, Opinion editor at Southern California News Group.	<b>165</b>	<b>HAMILL DECL.</b>
15				
16	<b>Exh. 18</b>	Draft Declaration for Sal Rodriguez.	<b>167-</b>	<b>HAMILL</b>
17			<b>171</b>	<b>DECL.</b>
18	<b>Exh. 19</b>	Timeline of events from Alt Account.	<b>173-</b>	<b>ROJAS</b>
19			<b>176</b>	<b>DECL.</b>
20	<b>Exh. 20</b>	E-mail exchange with counsel for X Corp. seeking filing of documents under seal.	<b>178-</b>	<b>HAMILL</b>
21			<b>183</b>	<b>DECL.</b>
22	<b>Exh. 21</b>	Documents produced by X Corp. marked as confidential and requested to file under seal.	<b>185-</b>	<b>HAMILL</b>
23			<b>209</b>	<b>DECL.</b>
24		<ul style="list-style-type: none"> <li>X_CORP_004627-X_CORP_004628,</li> </ul>		
25		X_CORP_009394 - X_CORP_009395,		
26		X_CORP_005807- X_CORP_005809, and		
27		X_CORP_003037 - X_CORP_003038 show		
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	<p>[REDACTED]</p> <p>REDACTED PER CRC 2.551(b)(3)(A)(ii)</p> <p>[REDACTED]</p> <ul style="list-style-type: none"><li>• X_CORP_010894 - X_CORP_010969 and X_CORP_010993 – 010998 show [REDACTED]</li></ul> <p>REDACTED PER CRC 2.551(b)(3)(A)(ii)</p> <p>[REDACTED]</p> <ul style="list-style-type: none"><li>• X_CORP_010970 shows [REDACTED]</li></ul> <p>REDACTED PER CRC 2.551(b)(3)(A)(ii)</p> <p>[REDACTED]</p>		
<b>Exh. 22</b>	Statement of Jonathan Hawk regarding confidentiality of documents and request to file under seal.	<b>211-213</b>	<b>HAMILL DECL.</b>

Respectfully submitted:

Dated: August 18, 2023

Hamill Law & Consulting

By: /s/ Julie A. Hamill  
Julie A. Hamill  
Attorney for Petitioner  
Alliance of Los Angeles County Parents

# **EXHIBIT 1**

## **Exhibit 1**

July 7, 2022 Media Briefing available at  
<https://www.youtube.com/watch?v=DJ4M8cfNi6g&t=278s>

Transcript of relevant portions of video:

### **14:30 – 14:41**

“Should we remain in the high community level designation for two consecutive weeks, universal indoor masking in alignment with CDC would be implemented across L.A. County.” - LACDPH Director Barbara Ferrer.

### **36:20 – 37:10**

“When’s the earliest LA County could enter a new universal mask mandate would it be like Thursday July 21<sup>st</sup> or Friday July 22<sup>nd</sup> or the week after that?” – Ron Lin, Los Angeles Times

“Yeah, let me just answer that so few weeks, so Thursday’s the day we post, so it would be let’s say we enter into high this Thursday, it would be two weeks from this Thursday, this upcoming Thursday, not today. So next week, what would that be, the 14<sup>th</sup> I think? So if we enter into high on the 14<sup>th</sup> it will be two weeks later. If we stay in high for those two weeks.” – LACDPH Director Barbara Ferrer.

### **47:15 – 52:05**

“More than half the state’s counties are in the high transmission category already, including Ventura County, and by and large most of them, including Ventura, are not reinstating the universal indoor mask mandate. So, why do you feel it’s necessary in LA County? With that said, I interviewed your counterpart in Ventura County this week, Dr. Robert Levin, and he told me his decision to not reinstate the mask mandate is because people have the tools to stop the spread and need to responsibly take advantage of them on their own. And he says, we are nearing, if not already in the endemic phase of the pandemic. So, what does the endemic stage look like for you?” – Marla Tellez, Fox 11.

“Yeah thanks so much Marla, that’s a great question um and obviously um you know we have enormous respect for the county officials in other jurisdictions and their decisions. I do want to say um you know similar to the concerns that were raised in Alameda County when they first introduced their masking safety protocols a few weeks back um that for us, equity issues are paramount. And while it’s true we have an amazing set of tools that we can all use to protect ourselves, and in fact some of those tools will protect lots of other people as well, um there are many people who are in particularly in essential work environments, where they would benefit if more people around them were actually um using some of the safety precautions we know work. And that’s the case with masking. So yes, super important and super effective for each of us to put on a well-fitting, high filtration mask. But it’s a lot better, particularly if you’re at work, and you’re gonna have hundreds of exposures, if everyone around you also is wearing that well-fitting mask. So I think partly we’re such a large jurisdiction. Partly we’ve witnessed you know

really tragic and unconscionable differences and disproportionality in who's been the hardest hit, that we want to make sure that where we have a simple and effective tool that can be used, it's not perfect but it will help slow transmission, it will help protect our essential workers, that we make sure, um, that we're using that tool, uh when the risk level gets high. So, I you know I think I I sort of rest there um we would like to have this be a short period of time. Wed like to never actually go into that high community level, but should we go there, uh we will need to really work together to quickly get ourselves back to that medium community level at which point we will return to optional masking indoors with a strong recommendation. I also want to point out that there are many places where everyone has to wear a mask. So I know sometimes it gets treated as if like no one has to wear a mask its free choice everywhere but that's absolutely not true. Everyone on public transit in LA County needs to wear their mask. Everyone in healthcare facilities, everyone in congregate care facilities, everyone in our shelters, uh people who are working and staying inside our prisons and our jails. These are all sites where people are wearing their masks to try again keep transmission as low as possible. So we do have other sites where people are wearing their masks. I also want to point out that we are a county department where everybody has to wear their masks indoors. And there are many other businesses that also require masking indoors. Uh we implemented indoor masking about a week and a half ago when we too started seeing like everyone else lots more outbreaks at the worksites disrupting essential work that was happening and creating risk for many of our employees, some of which are vulnerable, as employees are everywhere. So again, I think this is an appropriate step that well take should we again reach that high community level, which really stands for significant increase in risk of transmission and risk of sort of the associated disruptions and heartache that can come with that higher level of transmission.” – LACDPH Director Barbara Ferrer.



# **EXHIBIT 2**

## **Exhibit 2**

July 13, 2022 LAC+USC Virtual Town Hall Meeting - LAC+USC Medical Center Video available at: [https://www.youtube.com/watch?app=desktop&v=\\_fGuA-nU7EI&t=469s](https://www.youtube.com/watch?app=desktop&v=_fGuA-nU7EI&t=469s); last visited July 30, 2023.

### **8:27 – 8:34**

“We’re seeing a lot of people with mild disease in urgent care or ED who go home and do not get admitted.” – Dr. Brad Spellberg, MD.

### **9:12 - 9:23**

“It is just not the same pandemic as it was, despite all the media hype to the contrary.” – Dr. Brad Spellberg, MD.

“Yeah public health is scared.” – Jorge Orozco

“A lot of people have bad colds, is what we’re seeing.” – Dr. Brad Spellberg, MD.

### **10:11 – 10:15**

“[W]e’re just seeing nobody with severe COVID disease.” – Dr. Paul Holtom, MD.

### **10:17 – 10:24**

“[W]e have no one in the hospital who had pulmonary disease due to COVID. Nobody in the hospital.” – Dr. Paul Holtom, MD.

### **11:07 – 11:15**

“[C]ertainly there is no reason from a hospitalization due to COVID perspective, to be worried at this point.” – Dr. Paul Holtom, MD.

# **EXHIBIT 3**


### **Exhibit 3**

July 14, 2022 Public Health Virtual Media Briefing. Video available at <https://www.youtube.com/watch?v=uzHGjm8FI0s>; last visited July 30, 2023

**42:40 - 45:36**

“Why are we bothering to go in this direction when so many others are not? I think I showed you the data that drives our decisions. We feel like unfortunately for some people this is still a virus that can cause a fair amount of devastation. At this point we have tried to ask people to make their own decisions about masking and go ahead and mask so that we could slow down transmission and that hasn’t been very successful. We think many more people are likely to now go ahead and put on those masks. Getting transmission levels down low benefits everybody but it particularly reduces risk for those most vulnerable. You know LA County’s huge, we’re over 10 million people. Any those people that are unvaccinated, alone, in LA County are two million people who we all know will have a lot of increased risk. We also have a lot of folks who are older. WE have lots of nursing homes here. That means lots of residents who live in those nursing homes and are at higher risk when the rates are this high. WE have many essential workers who work in manufacturing plants and factories because we are a highly industrial county where we’ve seen lots and lots of outbreaks in the past and easy transmission. So again layering layering in protections for our most vulnerable workers a lot of them essential workers many of them low wage workers at this point seems like a sensible step. And you’ve all seen the data that disproportionality continues so that those eople who live in communities with higher rates of poverty, our black and brown residents are ending up hospitalized at higher rates especially during surges than other people. As a matter of fact last week I showed data that shows fully vaccinated residents living in communities with high rates of poverty are more likely to be hospitalized than unvaccinated residents that live in our wealthiest communities. We’re trying to address disproportionality , add in this layer of protection. We have two hopes – one is that we start to see some significant declines and don’t actually need to move forward with indoor universal indoor masking. And the second is that if we should need to move forward, its because it’s really important for us to layer in that protection because our rates are not coming down that many folks do so so that we can just be in this high community level for a very short period of time.” – LACDPH Director Barbara Ferrer.

# **EXHIBIT 4**

Tue 7/19/2022 5:35 PM  

DPH-  
ehannouncement

To: DPH-ehannouncement

TO: All Environmental Health Specialist Team Members

In anticipation of the reinstatement of the indoor mask mandate on Friday, July 29<sup>th</sup>, volunteers will be needed to work overtime **on the weekends of July 30 and 31, and August 6 and 7.**

The anticipated hours are:

Saturday – 10:00 am to 7:00 pm, with a 1 hr. lunch break

Sunday – 10:00 am to 7:00 pm, with a 1 hr. lunch break

On these weekends, volunteers will be visiting businesses at high risk for COVID transmission to educate/confirm compliance regarding the reinstatement of the indoor mask mandate.

All field inspectors (regardless of current program assignment) are asked to sign up to work overtime using the link below.

<https://forms.office.com/pages/designpagev2.aspx?lang=en-US&origin=OfficeDotCom&route=Start&sessionid=eaf3c796-9e59-49a6-90de-09603ec21ce7&subpage=design&id=SHJZBzjqG0WKvqY47dusgVyOuWnzzsJCIBg9l3kxdiNURUFEMTIJRUM2QzhZNTdCS1pHR1FNWFFPRy4u&analysis=false>

## Microsoft Forms

Easily create surveys, quizzes, and polls.

[forms.office.com](https://forms.office.com)

Chief Environmental Health Specialists are also needed to volunteer to provide supervisory coverage over the weekend. Please use the same link above to sign up to work overtime.

All volunteers must have a laptop and use ECR to complete inspection reports that will be due at the end of each shift. Volunteers must also have a county cellphone.

**Sign ups to volunteer are needed by Monday, July 25<sup>th</sup>.**

Training on enforcement of the indoor mask mandate will be provided on Wednesday, July 27<sup>th</sup>. Additional information on this training is forthcoming.

\*\*\*\*\*

*Sent at the request of Liza E. Frias, Director of Environmental Health*

# **EXHIBIT 5**

**Congress of the United States**  
Washington, DC 20515

January 23, 2018

Mark Zuckerberg  
Chairman and Chief Executive Officer  
Facebook Inc.  
1 Hacker Way  
Menlo Park, CA 94025

Mr. Jack Dorsey  
Chief Executive Officer  
Twitter, Inc.  
1355 Market Street  
Suite 900  
San Francisco, CA 94103

Dear Mr. Dorsey and Mr. Zuckerberg:

We seek your companies' urgent assistance. Public reports indicate that accounts linked to the Russian government are again exploiting Twitter and Facebook platforms in an effort to manipulate public opinion.<sup>1</sup> These recent Russian efforts are intended to influence congressional action and undermine Special Counsel Mueller's investigation, which has already resulted in the indictments of two Trump campaign officials and guilty pleas from two others, who are both now cooperating with prosecutors. It is critically important that the Special Counsel's investigation be allowed to proceed without interference from inside or outside the United States. That is why we seek your assistance in our efforts to counter Russia's continuing efforts to manipulate public opinion and undermine American democracy and the rule of law.

Specifically, on Thursday, January 18, 2018, the House Permanent Select Committee on Intelligence (HPSCI) Majority voted to allow Members of the U.S. House of Representatives to review a misleading talking points "memo" authored by Republican staff that selectively references and distorts highly classified information. The rushed decision to make this document available to the full

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<sup>1</sup> Natasha Bertrand, "Russia-linked Twitter accounts are working overtime to help Devin Nunes and Wikileaks," Business Insider, Jan. 19, 2018; Ken Dilanian and Mike Memoli, "Right-wing demand to #ReleaseTheMemo endorsed by Russian bots, trolls," NBC News, January 19, 2018; Warren Strobel and Jonathan Landay, "In fight over Russia memo, Republicans have unusual ally," Reuters, January 19, 2018.



House of Representatives was followed quickly by calls from some quarters to release the document to the public.

Several Twitter hashtags, including *#ReleaseTheMemo*, calling for release of these talking points attacking the Mueller investigation were born in the hours after the Committee vote.<sup>2</sup> According to the German Marshall Fund's Alliance for Securing Democracy, this effort gained the immediate attention and assistance of social media accounts linked to Russian influence operations.<sup>3</sup> By Friday, January 19, 2018, the *#ReleaseTheMemo* hashtag was "the top trending hashtag among Twitter accounts believed to be operated by Kremlin-linked groups."<sup>4</sup> Its use had "increased by 286,700 percent" and was being used "100 times more than any other hashtag" by accounts linked to Russian influence campaigns.<sup>5</sup> These accounts are also promoting an offer by WikiLeaks to pay up to \$1 million to anyone who leaks this classified partisan memo.

If these reports are accurate, we are witnessing an ongoing attack by the Russian government through Kremlin-linked social media actors directly acting to intervene and influence our democratic process. This should be disconcerting to all Americans, but especially your companies as, once again, it appears the vast majority of their efforts are concentrated on your platforms. This latest example of Russian interference is in keeping with Moscow's concerted, covert, and continuing campaign to manipulate American public opinion and erode trust in our law enforcement and intelligence institutions.

We understand Facebook and Twitter have developed significant expertise in identifying inauthentic and malicious accounts. Further, your forensic investigations into Russian government exploitation of your platforms during the 2016 U.S. election have helped expose to the American public the vast extent of Russia's covert influence efforts. We therefore request that your companies conduct an in-depth forensic examination of this real-time activity on your platforms to determine:

1. whether and how many accounts linked to Russian influence operations are involved in this campaign;

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<sup>2</sup> See, e.g., Fox News, "Hannity," January 18, 2018, available at <http://www.foxnews.com/transcript/2018/01/18/rebs-jim-jordan-and-matt-gaetz-on-fisa-abuses.html>.

<sup>3</sup> Bertrand, *supra*, note 1.

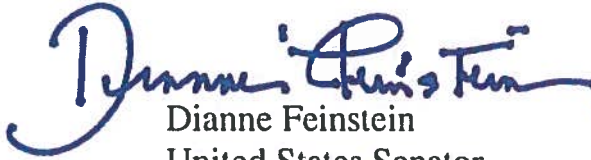
<sup>4</sup> Ali Breland, "Russian Twitter accounts pushing for release of 'shocking' surveillance memo," *The Hill*, Jan. 19, 2018.

<sup>5</sup> *Id.*

2. the frequency and volume of their postings on this topic; and
3. how many legitimate Twitter and Facebook account holders have been exposed to this campaign.

Given the urgency of this matter, we ask that you provide a public report to Congress and the American public by January 26, 2018. In addition, we urge your companies to immediately take necessary steps to expose and deactivate accounts involved in this influence operation that violate your respective user policies.

Sincerely,



Dianne Feinstein  
United States Senator



Adam B. Schiff  
Member of Congress

# **EXHIBIT 6**

RPTR FORADORI

EDTR CRYSTAL

NATIONAL SECURITY CHALLENGES OF ARTIFICIAL  
INTELLIGENCE, MANIPULATED MEDIA, AND "DEEPPAKES"

Thursday, June 13, 2019

U.S. House of Representatives,  
Permanent Select Committee on Intelligence,  
Washington, D.C.

The committee met, pursuant to call, at 9:00 a.m., in Room 1100, Longworth House Office Building, the Honorable Adam Schiff (chairman of the committee) presiding.

Present: Representatives Schiff, Himes, Sewell, Quigley, Castro, Heck, Welch, Maloney, Demings, Krishnamoorthi, Nunes, Wenstrup, Stewart, Crawford, Hurd, and Ratcliffe.

"face swap" video in which Senator Elizabeth Warren's face is seamlessly transposed on the body of SNL actress Kate McKinnon.

[Video shown]

The Chairman. So the only problem with that video is Kate McKinnon actually looks a lot like Elizabeth Warren, but the one on the left was actually -- both were Kate McKinnon, one just had Elizabeth Warren's face swapped onto her, but it shows you just how convincing that kind of technology can be.

These algorithms can also learn from pictures of real faces to make completely artificial portraits of persons who do not exist at all.

[Video shown.]

The Chairman. Can anyone here pick out which of these faces are real and which are fake? And, of course, as you may all have guessed, all four are fake. All four of those faces are synthetically created, none of those people are real.

Think ahead to 2020 and beyond. One does not need any great imagination to envision even more nightmarish scenarios that would leave the government, the media, and the public struggling to discern what is real and what is fake. A state-backed actor creates a deepfake video of a political candidate accepting a bribe with the goal of influencing an election; or an individual hacker claims to have stolen audio of a private conversation between two world leaders when, in fact, no conversation took place; or a troll farm uses text-generating algorithms to write false or sensational news stories at scale, flooding social media platform and overwhelming journalists' ability to verify and users' ability to trust what they are seeing or reading.

What enables deepfakes and other modes of disinformation to become truly pernicious is the ubiquity of social media and the velocity at which false information can spread. We got a preview of what that might look like recently when a doctored video

of Speaker Nancy Pelosi went viral on Facebook, receiving millions of views in the span of 48 hours.

That video was not an AI-assisted deepfake, but rather a crude manual manipulation that some have called a cheapfake. **Nonetheless, the video's virality on social media demonstrates the scale of the challenge we face and the responsibilities that social media companies must confront.**

Already the companies have taken different approaches, with YouTube deleting the altered video of Speaker Pelosi, while Facebook labeled it as false and throttled back the speed it spread once it was deemed fake by independent fact checkers.

**Now is the time for social media companies to put in place policies to protect users from this kind of misinformation, not in 2021, after viral deepfakes have polluted the 2020 elections, by then it will be too late.**

And so, in keep with a series of open hearings that have examined different strategic challenges to our national security and our democratic institutions, the committee is devoting this hearing to deepfakes and synthetic media.

We need to soberly understand the implications of deepfakes, the underlying AI technologies, and the internet platforms that give them reach **before we consider appropriate steps to mitigate the potential harms.**

We have a distinguished panel of experts and practitioners to help us understand and contextualize the potential threat of deepfakes. But before turning to them, I would like to recognize Ranking Member Nunes for any opening statement he would like to give.

[The statement of The Chairman follows:]

\*\*\*\*\* COMMITTEE INSERT \*\*\*\*\*

The Chairman. Thank you all.

We will now proceed with questions. I recognize myself for 5 minutes.

Two questions, one for Professor Citron and one for Mr. Watts.

Professor, how broad is the immunity that the social media platforms enjoy?

And is it time to do away with that immunity so the platforms are required to maintain a certain standard of care?

It seems to me not very practical to think about bringing people to justice who are halfway around the world, or the difficulties of attribution, or the fact that, given the cheap cost of this technology now, just how much people can employ it.

Is it time to take that step?

Was it appropriate for one social media company to leave up the Pelosi video, even labeling it in a certain way?

And, Mr. Watts, what is a proportionate response should the Russians start to dump deepfakes, release a deepfake of Joe Biden to try to diminish his candidacy? What should the U.S. response be? Should it be a cyber response, not a tit for tat, in the sense of doing a deepfake of Putin, but rather some cyber reaction, or are sanctions a better response? How do we deter this kind of foreign meddling, realizing that that is only going to be one part of the problem?

Professor.

Ms. Citron. So I am going to start with how broad the immunity is, and then that it is time for us to amend Section 230 of the Decency Act.

So under a law passed in 1996, the Communications Decency Act, it largely was an anti-porn provision. I mean, if we can imagine the internet without porn. That was the objective of the Communications Decency Act.

And most of that law is struck down, but what remains is a provision, it is called

but it would be ex post.

Mr. Nunes. But it is a challenge. I mean, you talked about the 1996 law that needs to be changed. And I think it has to be one way or another, right? Either they have to be truly an open public square, which then it is very difficult to filter because then whoever is developing the filter puts their own bias into the filter.

Ms. Citron. But actually 1996, that bill, it did not imagine an open public square where private companies couldn't filter. The opposite. It was designed to encourage self-monitoring and to provide an immunity in exchange for Good Samaritan filtering and blocking of offensive content.

So the entire premise of Section 230 is to encourage and so provide an immunity so that there was filtering and blocking, because Congress knew it would be too hard for Congress or the FTC to get ahead of all this themselves. And that was in 1996.

Imagine now the scale that we face.

I think we should preserve the immunity, but condition it on reasonable content moderation practices so that there are some sites that literally traffic in abuse, that encourage illegality, and they should not enjoy immunity from liability.

Mr. Nunes. Right. But then we are back to where we started. I mean, this is the challenge, right? So how do we draft legislation that would --

Ms. Citron. Yep.

Mr. Nunes. -- that would enable that --

Ms. Citron. Happy to tell you how to do it.

So Section 230(c)(1) now says: No speaker or publisher -- or no online service shall be treated as the speaker or publisher, essentially, of someone else's content. What we can do is change Section 230(c)(1) to say that no online service that engages in reasonable content moderation practices shall be treated as the speaker or publisher of



somebody's content. So we can change Section 230 with some imagination.

Mr. Nunes. Then it depends on what the definition of reasonableness is.

Ms. Citron. And that is what law does really well. So every time I hear a lawyer say we can't figure out what is reasonable, it is called tort law. Negligence is built on the foundation of reasonableness. You know, so often law moves in a pendulum. We often start with no liability because we really want to protect businesses, and we should, and we experiment and we realize there is a lot of harm. And then we also overreact and impose strict liability. And then we get somewhere in the middle. That is where negligence lives, reasonable practices.

And we have industries. Content moderation has been going on for the past 10 years, and I have been advising Twitter and Facebook of all that time. There is meaningful reasonable practices that are emerging and have emerged in the last 10 years.

So we have a guide. It is not as if this is a new issue in 2019. So we can come up with reasonable practices.

Mr. Nunes. Thank you. I yield back, Mr. Chairman.

The Chairman. Mr. Himes.

Mr. Himes. Thank you, Mr. Chairman.

Dr. Doermann, I want to get a quick sense from you of what the status quo is with respect to our ability to detect and where that race is.

But before I do that, I just want to highlight something that I think is of actually very immediate and intense interest to the Intelligence Community.

Mr. Watts, you said something which is -- if something is happening on a base somewhere, we can just turn on the cameras. I am not sure that is right, right? Because if you can create a deepfake, there is no reason why you can't create a deepfake

# **EXHIBIT 7**

**CHAIRMAN ADAM B. SCHIFF**

**HOUSE PERMANENT SELECT COMMITTEE ON INTELLIGENCE**

**NATIONAL SECURITY CHALLENGES OF ARTIFICIAL INTELLIGENCE,  
MANIPULATED MEDIA, AND “DEEPPAKES”**

**JUNE 13, 2019**

In the heat of the 2016 election as the Russian hacking and dumping operation became apparent, my predominant concern was that the Russians would begin dumping forged documents along with the ones they stole. It would be all too easy for Russia, or another malicious actor to seed forged documents among the authentic ones in a way that would make them almost impossible to identify or rebut. Even if a victim could ultimately expose the forgeries for what they were, the damage would be done.

Three years later we are on the cusp of a technological revolution that could enable even more sinister forms of deception and disinformation by malign actors, foreign or domestic. Advances in AI and machine learning have led to the emergence of advanced digitally doctored types of media, so-called “deepfakes,” that enable malicious actors to foment chaos, division or crisis and they have the capacity to disrupt entire campaigns, including that for the presidency.

Rapid progress in artificial intelligence algorithms has made it possible to manipulate media – video, imagery, audio, and text – with incredible, nearly imperceptible results. With sufficient training data, these powerful deepfake-generating algorithms can portray a real person doing something they never did, or saying words they never uttered.

These tools are readily available and accessible to both experts and novices alike, meaning that attribution of a deepfake to a specific author – whether a hostile intelligence service or a single Internet troll – will be a constant challenge.

What's more, once someone views a fake video, the damage is done. Even if later convinced that what they have seen is a forgery, that person may never lose completely the lingering negative impression the video has left them. It is also the case, that not only may fake videos be passed off as real, but real information can be passed off as fake. This is called the liars dividend, in which people with a propensity to deceive are given the benefit of an environment in which it is increasingly difficult for the public to determine what is true.

To give our Members and the audience a sense of the quality of deepfakes today, I want to show a few short examples.

1. The first comes from Bloomberg Businessweek, demonstrating an AI-powered cloned voice of one of its journalists.
2. The second clip, comes from Quartz and demonstrates a “puppet master” type of deepfake video. As you can see, these people are able to co-opt the head movements of their targets. If married with convincing audio, you can turn a world leader into a ventriloquist dummy.
3. Next, a brief CNN clip highlighting new research from Professor Hany Farid, an acclaimed expert on deepfakes from UC Berkeley, and featuring an example of a so-called “face swap” video in which Senator Elizabeth Warren’s face is seamlessly transplanted on the body of SNL cast member Kate McKinnon
4. These algorithms can also learn from pictures of real faces to make completely artificial portraits of persons who do not exist at all. Can anyone here pick out which of these faces are real, and which are fake? As you may have guessed, all four were synthetically built with the assistance of AI.

Thinking ahead to 2020 and beyond, one does not need any great imagination to envision even more nightmarish scenarios that would leave the government, the media, and the public struggling to discern what is real and what is fake:

- A state-backed actor creates a deepfake video of a political candidate accepting a bribe, with the goal of influencing an election;
- An individual hacker claims to have stolen audio of a private conversation between two world leaders, when in fact no such conversation took place;
- A troll farm uses text-generating algorithms to write false or sensational news stories at scale, flooding social media platforms and overwhelming journalists' ability to verify, and users' ability to trust what they are reading.

What enables deepfakes and other modes of disinformation to become truly pernicious is the ubiquity of social media, and the velocity at which false information can spread. We got a preview of what that might look like recently when a doctored video of Speaker Nancy Pelosi went viral on Facebook, receiving millions of views in the span of 48 hours.

This video was not an AI assisted deepfake, but rather a crude, manual manipulation that some have termed a “cheap fake.” Nonetheless, the video’s virality on social media demonstrates the scale of the challenge we face, and the responsibilities that social media companies must confront. Already, the companies have taken different approaches, with YouTube deleting the altered video of Speaker Pelosi, while Facebook labeled it as false and throttled back its spread once it was deemed fake by independent factcheckers.

Now is the time for social media companies to put in place policies to protect users from misinformation, not in 2021 after viral deepfakes have polluted the 2020 elections. By then, it will be too late.

And so, in keeping with the series of open hearings that have examined different strategic challenges to our national security and our democratic institutions, the Committee is devoting this hearing to the deepfakes and synthetic media.

We need to soberly understand the implications of deepfakes, the underlying AI technologies, and the Internet platforms that give them reach, before we consider appropriate steps to mitigate the potential harms.

We have a distinguished panel of experts and practitioners to help us understand and contextualize the potential threat of deepfakes, but before turning to them, I would like to recognize Ranking Member Nunes for any opening statement he wishes to give.



# **EXHIBIT 8**

**United States Senate Committee on the Judiciary  
Subcommittee on Privacy, Technology, and the Law**

**Testimony of Lauren Culbertson  
Head of U.S. Public Policy  
Twitter, Inc.**

**April 27, 2021**

Chairman Coons, Ranking Member Sasse, and Members of the Subcommittee:

Thank you for the opportunity to appear before you today to provide testimony on behalf of Twitter at today's hearing, "Algorithms and Amplification: How Social Media Platforms' Design Choices Shape Our Discourse and Our Minds."

Twitter's purpose is to serve the public conversation. While in 2006, this meant providing a platform for people to share 140-character status updates, our service has evolved to become the go-to place for people to see what's happening in the world, share opinions and observations, and engage in conversations on topics as diverse as sports, popular culture, and politics.

While technology has changed significantly since we were founded 15 years ago, our mission has not. We remain committed to giving people the power to create and share ideas and information instantly with the world.

Many of the questions we grapple with today are not new, but the rise and evolution of the online world have magnified the scale and scope of these challenges. As a global company that values free expression, we find ourselves navigating these issues amidst increasing threats to free speech from governments around the world. We strive to give people a voice while respecting applicable law and staying true to our core principles.

We use technology every day in our efforts to automatically improve outcomes and experiences for people on Twitter. We do that, in part, through algorithms. For example, our machine learning tools help identify potentially abusive or harmful content, including content that violates Twitter's Rules, to human moderators for review. In fact, we now take enforcement action on more than half of the abusive Tweets that violate our rules before they're even reported. We think this is critical, as we don't think the burden to identify and report such content should be on those who are the subject of abusive content.

As members of Congress and other policymakers debate the future of Internet regulation, they should closely consider the ways technology, algorithms, and machine learning make Twitter a safer place for the public conversation and enhance the global experience with the Internet at large.

We've invested significantly in our systems and have made strides to promote healthy conversations. However, we believe that as we look to the future, we need to ensure that all our efforts are centered on trust. Our content moderation efforts or the deployment of machine learning can be successful only if people trust us. That's why we think it is critical that we focus on being more open and decentralized. That means we must prioritize and build into our business increased transparency, consumer choice, and competition. In my testimony, I will highlight how we are innovating and experimenting in this area through (1) expanded algorithmic choice; (2) the Twitter Responsible Machine Learning initiative; (3) the Birdwatch initiative; and (4) the Bluesky project.

### **Expanded Algorithmic Choice**

At Twitter, we want to provide a useful, relevant experience to all people using our service. With hundreds of millions of Tweets every day on the service, we have invested heavily in building systems that organize content to show individuals the most relevant information for that individual first. With over 192 million people using Twitter each day in dozens of languages and countless cultural contexts, we rely upon machine learning algorithms to help us organize content by relevance.

We believe that people should have meaningful control over key algorithms that affect their experience online. In 2018, we redesigned the home Timeline, the main feature of our service, to allow people to control whether they see a ranked timeline, or a reverse chronological order ranking of the Tweets from accounts or topics they follow. This "sparkle icon" improvement has allowed people using our service to directly experience how algorithms shape what they see and has allowed for greater transparency into the technology we use to rank Tweets. This is a good start. And, we believe this points to an exciting, market-driven approach that provides individuals greater control over the algorithms that affect their experience on our service.

## **Responsible Machine Learning Initiative**

We are committed to gaining and sharing a deeper understanding of the practical implications of our algorithms. Earlier this month, we launched our “Responsible Machine Learning” initiative, a multi-pronged effort designed to research the impact of our machine learning decisions, promote equity, and address potential unintentional harms. Responsible use of technology includes studying the effects that the technology can have over time. Sometimes, a system designed to improve people’s online experiences could begin to behave differently than was intended in the real world. We want to make sure we are studying such developments and using them to build better products.

This initiative is industry-leading and the very first step and investment into a journey of evaluating our algorithms and working through ways we can apply those findings to make Twitter and our entire industry better. We will apply what we learn to our work going forward, and we plan to share our findings and solicit feedback from the public. While we are hopeful about the ways this may improve our service, our overarching goal is increasing transparency and contributing positively to the field of technology ethics at large.

## **Birdwatch**

We’re exploring the power of decentralization to combat misinformation across the board through Birdwatch — a pilot program that allows people who use our service to apply crowdsourced annotations to Tweets that are possibly false or misleading. We know that when it comes to adding context, not everyone trusts tech companies — or any singular institution — to determine what context to add and when. Our hope is that Birdwatch will expand the range of voices involved in tackling misinformation as well as streamline the real-time feedback people already add to Tweets. We are working to ensure that a broad range of voices participate in the Birdwatch pilot so we can build a better product that meets the needs of diverse communities. We hope that engaging the broader community through initiatives like Birdwatch will help mitigate current deficits in trust.

We are committed to making the Birdwatch site as transparent as possible. All data contributed to Birdwatch will be publicly available and downloadable. As we develop algorithms that power Birdwatch — such as reputation and consensus systems — we intend to publish that code publicly in the Birdwatch Guide.

## **Bluesky**

Twitter is funding Bluesky, an independent team of open source architects, engineers, and designers, to develop open and decentralized standards for social media. It is our hope that Bluesky will eventually allow Twitter and other companies to contribute to and access open recommendation algorithms that promote healthy conversation and ultimately provide individuals greater choice. These standards could support innovation, making it easier for startups to address issues like abuse and hate speech at a lower cost. We recognize that this effort is complex, unprecedented, and will take time but we currently plan to provide the necessary exploratory resources to push this project forward.

## **Conclusion**

We appreciate the enormous privilege to host some of the most important conversations happening at any given time — from real-time updates on Supreme Court rulings to information-sharing about COVID-19 vaccine clinical trials. We are proud of the open service we have built and the steps we take each day to ensure a safe venue for diverse voices and vibrant debate. Moving forward, we believe that more open and decentralized systems will increase transparency, provide more consumer control and choice, and increase competition across our industry. Our hope is that such a system will lead to the necessary innovation to meet today's needs and solve tomorrow's challenges. Most importantly, it will build trust.

Thank you again for the opportunity to share Twitter's perspective with the Subcommittee and the public.

# **EXHIBIT 9**



ADAM B. SCHIFF

MEMBER OF CONGRESS • 28<sup>TH</sup> DISTRICT, CALIFORNIA

2269 RAYBURN HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515

245 EAST OLIVE AVENUE, SUITE 200  
BURBANK, CA 91502

@RepAdamSchiff • schiff.house.gov

April 29, 2020

Jack Dorsey  
Chief Executive Officer  
Twitter, Inc.  
1355 Market Street, Suite 900  
San Francisco, CA 94103

Dear Mr. Dorsey:

As we all work to control the COVID-19 pandemic, I want to thank you for the actions you have taken to ensure Twitter's users are provided with timely, authoritative, and factual sources. I was encouraged to see your early commitment to working closely with other social media companies to jointly combat fraud and misinformation during this societal challenge that transcends any one platform or service.

As we face this public health crisis, Americans want and need to receive the best information possible so that they can keep themselves, their families, and their communities healthy. I commend you for steps you have already taken to highlight information from official health sources and to remove or limit content that promotes harmful medical misinformation. Twitter's efforts to verify the accounts of credible public health authorities and commitment to remove Tweets with information that is misleading or contradicts guidance from global and local health authorities are important actions to protect the health and safety of hundreds of millions of users.

Despite your best efforts, however, users will continue to see and engage with harmful medical content on your platform, whether by intentionally seeking it out or otherwise. Among the harmful misinformation currently on Twitter, recent reporting has shown that it is easy to find posts spreading false and dangerous statements about the coronavirus or treatments,<sup>1</sup> including conspiracy theories linking the virus to 5G towers, anti-vaccine messages suggesting the virus was engineered, and videos suggesting that drinking or consuming bleach may cure the disease.

Though the best protection is removing or downgrading harmful content before users engage with it, that is not always possible. As you are likely aware, Facebook recently announced plans to display messages to any users who have engaged with harmful coronavirus-related misinformation that has since been removed from the platform and connect them with resources from the World Health Organization. This echoes Twitter's own decision in 2018 to proactively notify users who engaged with identified Internet Research Agency (IRA) accounts. I urge you to adopt a similar

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<sup>1</sup> Rebecca Heilweil, "How the 5G coronavirus conspiracy theory went from fringe to mainstream," *Recode*, Vox Media, April 24, 2020.

transparency practice for Twitter users who engage with harmful misinformation about the coronavirus, to further bolster ongoing efforts that promote authoritative, medically accurate resources.

While taking down harmful misinformation is a crucial step, mitigating the harms from false content that is removed requires also ensuring that those users who accessed it while it was available have as high a likelihood of possible of viewing the facts as well.

I recognize the complex challenges that misinformation presents to online platforms like Twitter, in this and many other contexts. As we all grapple with this unprecedented health situation, I hope you will consider this suggestion for keeping users better informed. Thank you for your attention to my concerns, and I look forward to continuing our ongoing dialogue on these important issues.

Sincerely,

A handwritten signature in blue ink, appearing to read "Adam B. Schiff". The signature is fluid and cursive, with the first name "Adam" and last name "Schiff" being the most legible parts.

Adam B. Schiff  
MEMBER OF CONGRESS



# **EXHIBIT 10**

**Congress of the United States**  
**Washington, DC 20515**

December 8, 2022

Elon Musk  
Chief Executive Officer  
Twitter, Inc.  
1355 Market Street, Suite 900  
San Francisco, CA 94103

Dear Mr. Musk:

As Members of Congress, we are deeply concerned about the recent rise in hate speech on Twitter. Analysis by independent researchers indicates Twitter has become an increasingly toxic place for our constituents, and we are reaching out to you to understand the actions Twitter is taking to combat this increase in harmful content.

Although you tweeted that one of your goals as Chief Executive Officer of Twitter was strong content moderation on the platform, the results of your leadership have been the opposite.<sup>1</sup> Multiple reports have shown that since you became CEO in late October, hate speech has dramatically increased on Twitter. Under your leadership, there has been an extreme spike in the number of tweets that include slurs, the level of engagement with these tweets, and the popularity of spreading this harmful rhetoric.

According to the Center for Countering Digital Hate (CCDH), the number of tweets containing slurs has grown since you have become CEO compared to the 2022 average. Slurs against Black people have tripled in daily mentions.<sup>2</sup> Slurs against women have increased 33 percent from the 2022 average mentions, and slurs against gay men have increased by 58 percent.<sup>3</sup> Before you assumed the role of CEO, engagement with these tweets averaged 13.3 replies, retweets, or likes. Now, engagement with slurs has increased 273 percent, with the average number of replies, retweets, or likes averaging 49.5 on tweets containing hate speech.<sup>4</sup>

Of particular concern to us is the rise in anti-LGBTQ+ rhetoric on Twitter under your supervision. Based on data analysis, anti-LGBTQ+ extremists are picking up followers at quadruple the pace since the change in leadership.<sup>5</sup> With increased followers, these actors are seeing wider circulation of their hateful tweets on the platform, which we fear might spark even more real-world violence against the LGBTQ+ community.

After the Colorado Springs Shooting, in which the LGBTQ+ community was specifically targeted, we saw anti-LGBTQ+ hate become viral on Twitter. Research found that tweets from prominent extremists have been “viewed tens of millions of times in the wake of the Colorado Springs Shooting” and that just 20 of the most prominent hateful tweets “can be estimated to have picked up a total of 35 million views.”<sup>6</sup> You tweeted that the “New Twitter policy is freedom of speech, but not freedom of reach. Negative/hate

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<sup>1</sup> <https://twitter.com/elonmusk/status/1588666105023041536?lang=en>

<sup>2</sup> <https://counterhate.com/blog/the-musk-bump-quantifying-the-rise-in-hate-speech-under-elon-musk/>

<sup>3</sup> [Hate Speech’s Rise on Twitter Under Elon Musk Is Unprecedented, Researchers Find - The New York Times \(nytimes.com\)](https://www.nytimes.com/2022/11/02/technology/twitter-hate-speech-elon-musk.html)

<sup>4</sup> <https://counterhate.com/blog/the-musk-bump-quantifying-the-rise-in-hate-speech-under-elon-musk/>

<sup>5</sup> <https://counterhate.com/blog/the-musk-bump-quantifying-the-rise-in-hate-speech-under-elon-musk/>

<sup>6</sup> <https://counterhate.com/blog/the-musk-bump-quantifying-the-rise-in-hate-speech-under-elon-musk/>

tweets will be max deboosted & demonetized” but we have yet to see any evidence of follow-through on Twitter.<sup>7</sup>

We have also seen a significant increase in antisemitism on the platform. The Anti-Defamation League recently found that there was a “61.3% increase in the volume of tweets (excluding retweets) referencing ‘Jews’ or ‘Judaism’ with an antisemitic sentiment” since you became CEO.<sup>8</sup> Simultaneously, Twitter has decreased its content moderation, as researchers found that Twitter went from “taking action on 60% of antisemitic tweets to taking action on only 30%.”<sup>9</sup> We are glad to see you have suspended Kanye West’s account following his antisemitic posts, but this step must be paired with further decisive and preventative action from your platform.

We find the rise of extremist actors and hate speech on Twitter demonstrably at odds with your company’s statement that human safety is a “top priority”.<sup>10</sup> And despite your assertion that there has been a decline in “hate speech impressions” from the “pre-spike levels,”<sup>11</sup> you have not provided data showing how you are measuring hate speech that would allow outside researchers to validate your assessment. In direct contrast, CCDH’s social media analytic tools found that the number of tweets containing slurs and engagements are still above the average 2022 levels.<sup>12</sup> It appears that a byproduct of your company’s “embracing public testing”<sup>13</sup> approach is harm to your users.

With rapidly changing and unclear policies on content moderation on Twitter, amid documented negative trends and public evidence, we are concerned about the individual and community harm arising from Twitter, including how that could spill from online into real life. We are seeking further information about your plans for content moderation and the capability of your workforce to implement and enforce your policies.

As part of our ongoing oversight efforts, we request answers to the following questions, as well as a briefing to discuss other areas of oversight:

- What steps is your company taking in response to the recent rise in hate speech on your platform and how do you plan to make these decisions available to the public? Additionally, what is your timeline for rolling out any of these changes?
- Your company has stated that human safety is a priority, but anti-LGBTQ rhetoric has increased since the Colorado Springs Shooting. We have also seen a distinct rise in antisemitism on the platform. What is Twitter’s plan to increase safety for its users, and more specifically the LGBTQ+ community and the Jewish community?
- What is the current process for enforcing content moderation on your platform? How do you plan to make these processes transparent and available to the public and researchers?
- With the recent drastic reduction in the number of Twitter employees, including specialist content moderators, engineers, and safety team members, what is your company’s current capability and capacity to handle the risks arising from the extreme rise in hate speech, hate actors and the growth of hate communities? What is the current risk-assessment process and response timeline for viral hate speech and disinformation?

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<sup>7</sup> <https://twitter.com/elonmusk/status/1593673339826212864>

<sup>8</sup> <https://twitter.com/ADL/status/1593714819932332034>

<sup>9</sup> <https://twitter.com/ADL/status/1593714819932332034>

<sup>10</sup> <https://marketing.twitter.com/en/perspectives/brand-safety-is-human-safety>

<sup>11</sup> <https://twitter.com/elonmusk/status/1595630109116989440?lang=en>

<sup>12</sup> <https://counterhate.com/blog/the-musk-bump-quantifying-the-rise-in-hate-speech-under-elon-musk/>

<sup>13</sup> [https://blog.twitter.com/en\\_us/topics/company/2022/twitter-2-0-our-continued-commitment-to-the-public-conversation](https://blog.twitter.com/en_us/topics/company/2022/twitter-2-0-our-continued-commitment-to-the-public-conversation)

Thank you for your attention to this matter.

Sincerely,



Adam Schiff  
Member of Congress



Mark Takano  
Member of Congress

# **EXHIBIT 11**

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# Destruction of Evidence - Alliance of Los Angeles County Parents v. County of Los Angeles Dept of Public Health

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Julie Hamill <julie@juliehamill-law.com>

Thu, Apr 13, 2023 at 9:27 AM

To: Kent Raygor <KRaygor@sheppardmullin.com>, Valerie Alter <VAlter@sheppardmullin.com>

Dear Mr. Raygor and Ms. Alter,

In preparing the notices of deposition for Mr. Morrow and Dr. Ferrer, I noticed that the entire @lapublichealth twitter feed has been erased prior to September 2022. I assume this was not done intentionally to destroy evidence relevant to this case. I am requesting that you direct your client to preserve the archived data, especially the twitter feed from March 1, 2022 through the present. If there are any problems doing so, please let me know immediately.

Best regards,

Julie Hamill  
Hamill Law & Consulting  
[julie@juliehamill-law.com](mailto:julie@juliehamill-law.com)  
(424) 265-0529  
[www.juliehamill-law.com](http://www.juliehamill-law.com)

The information contained in this e-mail and any attachments to it may be legally privileged and include confidential information. If you have received this e-mail in error, please notify the sender immediately of that fact by return e-mail and permanently delete the e-mail and any attachments. Thank you.

**COMP.EXH.041**

# **EXHIBIT 12**

Videotaped Deposition of

**Brett Morrow**

July 07, 2023

Alliance of LA County Parents

vs.

County of LA Dept. of Public Health



[www.aptusCR.com](http://www.aptusCR.com) | 866.999.8310

**COMP.EXH.043**



Brett Morrow

1 Q. Did you ever ask any news outlets to remove a  
2 story from the Internet?

3 A. Not that I can recall.

4 MS. HAMILL: I'm going to have marked as  
5 Exhibit 2 an article -- an opinion article from the  
6 Southern California News Group.

7 (Exhibit 2 marked for identification.)

8 Q. (By Ms. Hamill) And this article is entitled  
9 "Bringing Back a Mask Mandate in Los Angeles County is  
10 Unjustified," and it was published July 22, 2022.

11 Do you recall seeing this article?

12 A. I --

13 MR. RAYGOR: Whenever you're given an ar- -- a  
14 document, you're entitled to read it, if you need to,  
15 the whole thing.

16 Q. (By Ms. Hamill) Yes. Feel free to take your  
17 time, and you don't -- if you want to take time to read  
18 the entire thing before I ask you any questions, that's  
19 perfectly fine with me.

20 A. I -- I remember this article, yes.

21 Q. Do you recall contacting the Southern  
22 California News Group to ask them to take this story  
23 offline?

24 A. I remember them -- contacting them. I don't  
25 believe I -- I don't believe I asked them to take it

Brett Morrow

1 offline. I believe I asked for a correction, if I  
2 remember correctly.

3 Q. And what did you want to have corrected? Take  
4 your time. There's no need to rush through this.

5 A. I can't remember the specific feedback I was  
6 providing or the correction I was asking for, but I  
7 believe it had to do something with the information on  
8 hospitalizations.

9 Q. Can you tell me which paragraph you're  
10 referring to. Which page?

11 A. On the second page, it may have been in  
12 Paragraph 2, 3, or 4, but I don't recall perfectly.

13 Q. Are you concerned that this particular article  
14 still remains online?

15 A. Not at this time, no.

16 Q. Not at this time. Why not?

17 A. Because very few people read articles from more  
18 than a year ago, I think, at this point.

19 MR. RAYGOR: Belated objection. Lacks  
20 foundation it still remains online.

21 Q. (By Ms. Hamill) So at the time that you  
22 reached out to the Southern California News Group, you  
23 had concerns, to your recollection, about the  
24 information included in Paragraphs 2, 3, and 4 on the  
25 second page of this document.

Brett Morrow

1 MR. RAYGOR: Objection. Mischaracterizes his  
2 testimony.

3 Q. (By Ms. Hamill) If I've mischaracterized your  
4 testimony, please correct me.

5 A. I can't remember exactly what you said. I  
6 apologize.

7 Q. I just want to be clear on what specifically  
8 you found objectionable within this document that led  
9 you to reach out to the Southern California News Group  
10 to ask for correction.

11 MR. RAYGOR: Asked and answered.

12 THE WITNESS: If I recall correctly, it was the  
13 paragraphs about hospitalizations.

14 Q. (By Ms. Hamill) And what specifically about  
15 hospitalizations did you take issue with?

16 MR. RAYGOR: Asked and answered. Calls for  
17 speculation.

18 THE WITNESS: I can't recall specifically what  
19 the issue was with this article.

20 Q. (By Ms. Hamill) Is there anything that would  
21 refresh your memory?

22 A. I think, unfortunately, the -- the  
23 correspondence that I did have -- and I believe it was  
24 with Saul Rodriguez, who's the editor for the opinion  
25 section for the Los Angeles Daily News -- was a phone

Brett Morrow

1 call, and I think it was in the evening as I was picking  
2 up food, so --

3 Q. That's a very specific memory.

4 A. It hasn't happened ever before or after.

5 Q. What hasn't happened before?

6 A. Having to speak to a reporter so late after  
7 hours while I was picking up food, yeah, so that memory  
8 sticks out.

9 Q. And so this must have been very important to  
10 you if you reached out after hours to a reporter while  
11 you were picking up food.

12 MR. RAYGOR: Objection. Vague and ambiguous as  
13 to "very important."

14 THE WITNESS: I believe I reached out to him  
15 before -- before the end of the day, and then he hadn't  
16 replied until after hours, and then that's when we  
17 discussed.

18 Q. (By Ms. Hamill) Do you recall the context of  
19 the conversation?

20 A. Not specifically, but I remember us going back  
21 and forth about certain issues with the reporting. If I  
22 recall correctly, he understood my issues and said he  
23 was going to take it back to either someone on his team  
24 or the authors.

25 Q. And do you recall any corrections being made

Brett Morrow

1 following that phone call?

2 A. I don't recall. I believe I followed up with  
3 him, and I don't think I heard back from him.

4 Q. Did you contact any of the authors? Their  
5 names are listed on the last page as well as the first  
6 page.

7 A. I don't believe I did.

8 MS. HAMILL: And for the record, the authors  
9 are Scott Balsitis, Jeffrey Klausner, Houman Hemmati,  
10 and Neeraj Sood.

11 Q. (By Ms. Hamill) In your role as Communications  
12 Chief -- and I mean from 2019 to the present, so I know  
13 your title has changed from Director to Communications  
14 Chief -- have you ever tried to kill a story to ensure  
15 that the Department of Public Health would be reflected  
16 in a positive light?

17 MR. RAYGOR: Asked and answered.

18 THE WITNESS: Not that I recall.

19 Q. (By Ms. Hamill) Do you generally correspond  
20 with news outlets via telephone?

21 A. No.

22 Q. What is your practice?

23 A. I'm best on e-mail.

24 Q. E-mail?

25 MR. RAYGOR: Asked and answered.

Brett Morrow

1 to post, there may have been rare occasions where we  
2 would ask someone on Fraser Communications to post for  
3 us, but I think rarely.

4 **Q. Has that been the case for the entire period**  
5 **from 2019 to the present?**

6 A. No. At one time, Fraser Communications was not  
7 a contracted agency prior to sometime in the spring of  
8 2020, so it was just internal at that time.

9 MS. HAMILL: Okay.

10 I'm going to have marked as Exhibit 3 an e-mail  
11 chain. This is labeled on the bottom right as 418  
12 through 420 from the production from the County  
13 Department of Public Health.

14 (Exhibit 3 marked for identification.)

15 **Q. (By Ms. Hamill) And I'll give you a couple of**  
16 **minutes to review this document.**

17 MR. RAYGOR: Julie, when you're done with this  
18 line of questioning, can we take a break?

19 MS. HAMILL: Sure.

20 **Q. (By Ms. Hamill) Have you seen this document**  
21 **before?**

22 A. I have, yes.

23 **Q. And do you recognize this document as an e-mail**  
24 **chain between you, Mr. Morrow, and the team at Fraser**  
25 **Communications?**

Brett Morrow

1 A. I do, yes.

2 Q. So let's start with the very first e-mail in  
3 this document at the top of what is marked on the bottom  
4 as 418, and this is from you to Monique Cisneros, Erica  
5 Lespron, and Bushra Aljaber. Am I pronouncing that --

6 A. I'm not sure.

7 Q. Okay.

8 MR. RAYGOR: So, Julie, sorry, for  
9 clarification -- when you say first, you mean first in  
10 placement or first in time?

11 MS. HAMILL: First in placement.

12 Q. (By Ms. Hamill) So the very top of the page on  
13 Exhibit 3, and this e-mail from you says, "Let's do it  
14 for all posts. I'm over people rn. LOL."

15 What does "rn" mean.

16 A. "Right now."

17 Q. And "LOL"?

18 A. "Laugh out loud."

19 Q. What did you mean when you said you are over  
20 people right now?

21 A. I think I was generally frustrated about the  
22 vitriol, the anger, and just the misinformation that was  
23 permeating our posts.

24 Q. Are there specific examples that you can recall  
25 of vitriol, anger, or misinformation?

Brett Morrow

1 disabled on Department of Public Health's social media,  
2 were the Board of Supervisors meetings remote?

3 A. I don't remember.

4 Q. Is there anything that would refresh your  
5 memory?

6 A. Not that I know of.

7 MS. HAMILL: Going to have marked as Exhibit 4  
8 the press release from the County of Los Angeles dated  
9 September 9th, 2022.

10 (Exhibit 4 marked for identification.)

11 Q. (By Ms. Hamill) Have you seen this document  
12 before?

13 A. I don't believe so.

14 Q. Does this document refresh your recollection  
15 that the Board of Supervisors meetings reopened to the  
16 public on September 27th of 2022?

17 A. It does, yes.

18 Q. And the decision to disable public comments was  
19 made in July of 2022; correct?

20 A. Yes.

21 Q. And so at the time that decision was made to  
22 close public comments, the public could not attend Board  
23 of Supervisors meetings in public; correct?

24 A. Correct, yes.

25 Q. So prior to September of 2022, how could the



Brett Morrow

1 in her participation in remote Board of Supervisors  
2 meetings?

3 A. I did not, no.

4 Q. Did she have her own technical team to do that?

5 A. Yes.

6 Q. And what was the process your office used to  
7 respond to direct messages on social media after  
8 disabling public comments?

9 A. Typically, depending on the question, we would  
10 just answer the question or point people to the right  
11 information on our website that they needed. If it was  
12 more complex, oftentimes, we would have to refer to  
13 other teams to get the information for them.

14 Q. And was it your policy to respond to every  
15 direct message?

16 A. I wouldn't say it's our policy, but we tried  
17 our best.

18 Q. Were there direct messages that went  
19 unresponded to?

20 A. I'm sure, yes.

21 Q. Do you have an idea of how many?

22 A. I don't, no.

23 Q. Do you have any idea how many direct messages  
24 your office has received since July of 2022?

25 A. I don't know.

Brett Morrow

1 Q. Can you estimate -- estimate the number? Is it  
2 more than 100 or less than 100?

3 A. I would say more than 100.

4 Q. More than 100.

5 A. Yes.

6 MR. RAYGOR: Asked and answered.

7 Q. (By Ms. Hamill) More than 1,000 or less than  
8 1,000?

9 A. Less than 1,000.

10 Q. So somewhere between 100 and 1,000.

11 A. Yes.

12 Q. And not all of those received responses.

13 MR. RAYGOR: Asked and answered.

14 THE WITNESS: I think --

15 (Stenographer clarification.)

16 THE WITNESS: -- very -- sorry. Very few  
17 didn't receive responses.

18 MS. HAMILL: I'm going to have marked as

19 Exhibit 5 printouts from the County's Twitter archive  
20 that was produced in discovery showing direct messages  
21 marked for identification.

22 (Exhibit 5 marked for identification.)

23 Q. (By Ms. Hamill) I'll give you a minute to look  
24 through these. And just for the record, Exhibit 5, the  
25 pages are labeled 136 through 142 at the bottom right.

Brett Morrow

1 So let's start at the last page of this exhibit  
2 which is marked on the bottom right as 142.

3 A. Um-hum.

4 Q. And this is a direct message to the Department  
5 of Public Health. Says, "Hello. I'm concerned that  
6 Ms. Ferrer says she's unable to get boosted. Could you  
7 please tell us why." And this message did not receive a  
8 response.

9 Do you recall seeing this particular message in  
10 the direct messages?

11 MR. RAYGOR: Objection. Lacks foundation it  
12 did not receive a response.

13 THE WITNESS: I don't recall seeing this  
14 message.

15 Q. (By Ms. Hamill) Did you personally ever review  
16 the direct messages or respond to direct messages  
17 yourself?

18 A. At times, yes.

19 Q. At times. I'll turn your attention to Page 141  
20 of this exhibit, and this is another direct message that  
21 asks, "Also, what is the official response to this?" and  
22 it shares an article about titanium dioxide particles in  
23 face masks.

24 Do you recall ever seeing this direct message?

25 MR. RAYGOR: Objection. Lacks foundation that

Brett Morrow

1 that's what that link discusses or addresses.

2 THE WITNESS: I don't recall seeing this  
3 message.

4 Q. (By Ms. Hamill) And -- okay.

5 And turning to what is marked as Page 138, it's  
6 another direct message that says: "Could you please let  
7 businesses and schools know that plastic barriers are  
8 outdated and unhelpful to stopping the spread of COVID?  
9 Thanks."

10 Do you recall ever seeing this direct message?

11 A. I don't recall.

12 Q. And if you had been responding to direct  
13 messages when this was received, would you have  
14 responded to it?

15 MR. RAYGOR: Objection. Improper hypothetical.  
16 Lacks foundation. Insufficient factual foundation in  
17 order to allow a proper response.

18 THE WITNESS: I'm not quite sure how to answer  
19 that, yeah.

20 Q. (By Ms. Hamill) It was quite a long objection.  
21 If you were checking the direct messages --

22 A. Um-hum.

23 Q. -- at the time this one was received, would you  
24 have ignored it, or would you have responded?

25 MR. RAYGOR: Improper and incomplete

Brett Morrow

1 hypothetical. Calls for speculation.

2 THE WITNESS: I don't know.

3 Q. (By Ms. Hamill) Is there anything particular  
4 about the wording in this direct message that would lead  
5 you to think it was okay to ignore it?

6 A. I don't know. I don't think so.

7 Q. Was it your practice to ignore any sort of  
8 direct message?

9 A. We didn't -- never purposely ignored messages.  
10 We tried to do what we can --

11 (Stenographer clarification.)

12 THE WITNESS: -- with our limited resources.

13 Q. (By Ms. Hamill) Was there ever a situation  
14 where you reviewed a direct message, and it was  
15 inflammatory, and you felt it didn't warrant a response?

16 A. I believe so, yes.

17 Q. Going back to the first page of this Exhibit  
18 No. 5, it's marked as 136 on the bottom right. Would  
19 you like me to read this out loud for you, or would you  
20 like to read it to yourself?

21 A. No, you don't --

22 Q. I can ask you about it.

23 Do you recall seeing --

24 MR. RAYGOR: Can we just -- sorry. Can we just  
25 finish reading.

Brett Morrow

1 MS. HAMILL: Sure.

2 MR. RAYGOR: Sorry. Go ahead.

3 Q. (By Ms. Hamill) Do you recall seeing this  
4 direct message?

5 A. I don't recall.

6 Q. Is it you who responded: "Is this for a media  
7 outlet?"

8 A. I don't remember.

9 Q. Okay.

10 And turning to the next page, this is a  
11 continuation of the same message. L.A. Public Health  
12 asks: "Is this for a media outlet?"

13 The messenger responds: "He is a freelance  
14 writer for a blog site."

15 The Public Health account responds --

16 (Stenographer clarification.)

17 Q. (By Ms. Hamill) -- "Okay. Yes. Best thing  
18 for him to do is to e-mail the media inbox. They are a  
19 separate team and can help him. Let me grab the e-mail  
20 address for you."

21 A member of the public responds, "Thanks so  
22 much."

23 The County responds, "Media@ph.lacounty.gov."

24 Does this refresh your memory as to this direct  
25 message?

Brett Morrow

1 A. In what way?

2 Q. Do you recall this respondent within the County  
3 being you?

4 A. Oh, I don't remember if this was me or not.

5 Q. And what is the media@ph.lacounty.gov address?

6 A. That's --

7 (Stenographer clarification.)

8 THE WITNESS: -- our media -- our e-mail intake  
9 for requests from media outlets.

10 Q. (By Ms. Hamill) And does this go to your team?

11 A. It does, yes.

12 MS. HAMILL: And I'm going to mark as

13 Exhibit 6 -- sorry. One of those is for Mr. Raygor.

14 Exhibit 6 is an e-mail dated August 22nd, 2022,  
15 from bobhoge@gmail.com to media@ph.lacounty.gov, and if  
16 you compare the content of this e-mail with the direct  
17 message on the first page of Exhibit No. 5, they look to  
18 be identical.

19 (Exhibit 6 marked for identification.)

20 MR. RAYGOR: Mischaracterizes the content of  
21 Exhibits 5, first page, and Exhibit 6. Some parts  
22 appear identical; others do not.

23 Q. (By Ms. Hamill) Did you receive this e-mail  
24 that's dated August 22nd?

25 A. It wasn't sent to me.

Brett Morrow

1 Q. Who answers the media@ph.lacounty.gov address?

2 MR. RAYGOR: Asked and answered.

3 THE WITNESS: We have different team members at  
4 different times who --

5 (Stenographer clarification.)

6 MR. RAYGOR: Keep your voice up.

7 THE WITNESS: I apologize.

8 -- who man the media inbox.

9 Q. (By Ms. Hamill) And those people are under  
10 your supervision.

11 A. Correct.

12 Q. Do you recall ever seeing this e-mail?

13 A. I don't recall.

14 Q. Do you recall ever responding to this e-mail?

15 A. I don't recall.

16 Q. Do you recall instructing your team not to  
17 respond to this e-mail?

18 A. I don't recall.

19 Q. Is there any reason that you can think of as to  
20 why that e-mail wouldn't get a response?

21 MR. RAYGOR: Objection. Lacks foundation that  
22 it didn't.

23 THE WITNESS: I don't know.

24 MS. HAMILL: I'm going to mark as Exhibit 7 a  
25 direct message dated March 6th.



Brett Morrow

1 (Exhibit 7 marked for identification.)

2 Q. (By Ms. Hamill) Have you seen this before?

3 A. I have not, no.

4 Q. Do you recognize this as a direct message to  
5 the L.A. County Department of Public Health?

6 A. I do, yes.

7 Q. From a Dr. Amir Guerami. And do you see any  
8 response to this direct message?

9 A. I do not.

10 MS. HAMILL: Mark as Exhibit 8 a direct message  
11 dated February 22nd.

12 (Exhibit 8 marked for identification.)

13 Q. (By Ms. Hamill) Do you recognize this document  
14 as a direct message from a member of the public to the  
15 Department of Public Health at L.A. County?

16 A. I do, yes.

17 Q. And do you see a response to this direct  
18 message?

19 A. I do not, no.

20 Q. Did you personally review this direct message?

21 A. No.

22 MS. HAMILL: I'm going to have marked as  
23 Exhibit 9 a direct message dated February 16th.

24 (Exhibit 9 marked for identification.)

25 MR. RAYGOR: And just for the record, Exhibits

Brett Morrow

1 7, 8, and 9 are from the year 2023.

2 Q. (By Ms. Hamill) Do you recognize this document  
3 as a direct message from a member of the public to the  
4 L.A. County Department of Public Health?

5 A. I do, yes.

6 Q. And does this message have a response?

7 A. It does not.

8 MS. HAMILL: I'm going to have marked as  
9 Exhibit No. 10 a direct message dated December 16th,  
10 2022.

11 (Exhibit 10 marked for identification.)

12 Q. (By Ms. Hamill) Do you recognize this document  
13 as direct messages from a member of the public to the  
14 L.A. County Department of Public Health?

15 A. I do, yes.

16 Q. And do you see any responses to this direct  
17 message?

18 A. I do not.

19 MS. HAMILL: I'm going to have marked as  
20 Exhibit 11 a direct message dated September 23, 2022.  
21 (Exhibit 11 marked for identification.)

22 Q. (By Ms. Hamill) Do you recognize this document  
23 as a direct message from a member of the public to the  
24 L.A. County Department of Public Health?

25 A. I do, yes.

Brett Morrow

1 Q. And do you see a response here to this direct  
2 message?

3 A. I do not.

4 MS. HAMILL: I'm going to mark as Exhibit  
5 No. 12 a direct message dated August 22nd, 2022.  
6 (Exhibit 12 marked for identification.)

7 Q. (By Ms. Hamill) Do you recognize this document  
8 as a direct message from a member of the public to the  
9 L.A. County Department of Public Health?

10 A. I do, yes.

11 Q. And do you see any response to this direct  
12 message?

13 A. I do not, no.

14 Q. And you didn't personally review this direct  
15 message when it came through, did you?

16 A. No.

17 Q. Are members of the public invited to L.A.  
18 County Department of Public Health press briefings?

19 A. They're invited to view them online. We live  
20 stream them, but typically the in-person are reserved  
21 for media.

22 Q. Does it require a press credential?

23 A. Not formally a press credential; we don't check  
24 press credentials. We typically know the reporters who  
25 show up or speak with them to learn about their media

Brett Morrow

1 outlet.

2 Q. But they are not open to the general public.

3 A. No.

4 Q. Are members of the press invited to the County  
5 Department of Public Health K through 12 briefings?

6 A. I don't know. I don't --

7 (Stenographer clarification.)

8 THE WITNESS: -- believe tele-briefings are  
9 open to media outlets.

10 Q. (By Ms. Hamill) Is that a policy that you came  
11 up with?

12 A. No.

13 Q. So would you ever tag or advise someone on your  
14 team to tag someone who disagrees with Dr. Ferrer's  
15 policies in the County's social media posts?

16 MR. RAYGOR: Objection. Compound.

17 THE WITNESS: I'm sorry. Can you break that  
18 up, yeah, if you could.

19 Q. (By Ms. Hamill) So do you understand what I  
20 mean when I say tagging someone in a social media post?

21 A. Yes.

22 Q. And it's true that currently, whoever the  
23 County tags in a social media post can respond.

24 A. I don't know if that's true for all platforms,  
25 but I believe for some, yes.

Brett Morrow

1 Q. For Twitter; correct?

2 A. For Twitter, yes, I believe so.

3 Q. Okay.

4 And so would you or anyone else on your team  
5 tag someone in a Twitter post that disagrees with  
6 Dr. Ferrer on COVID policy, for example?

7 MR. RAYGOR: Objection. Improper, incomplete  
8 hypothetical. Calls for speculation.

9 THE WITNESS: I don't -- we don't really tag  
10 people.

11 Q. (By Ms. Hamill) You don't tag people?

12 A. We don't necessarily, yeah. Rarely, if at all.

13 Q. Do you recall a specific instance when you did  
14 tag someone in a Twitter post?

15 A. I don't recall.

16 Q. What about a Facebook post?

17 A. I don't recall.

18 Q. Instagram?

19 A. I don't recall.

20 Q. Would it be unusual for the County to tag the  
21 L.A. County USC Hospital in a post?

22 A. I'm not sure what you mean by "unusual."

23 Q. Would you advise that your team not tag the  
24 L.A. County USC Hospital in a social media post?

25 A. No.

Brett Morrow

1 overall mission. Our mission is to improve the health  
2 and well-being of residents.

3 Q. And what do you consider to be bullying?

4 A. Name-calling, harassment, speaking angrily,  
5 trying to control someone with language, intimidation.

6 Q. Trying to control someone with language. What  
7 do you mean by that?

8 A. Trying to get people to back down from  
9 speaking.

10 Q. Can you give me an example.

11 A. If -- if somebody shouts at another person,  
12 they're trying to get someone to not speak, to  
13 intimidate them.

14 Q. And do you see it as part of your role as the  
15 Chief of Communications of the Department of Public  
16 Health to prevent that from happening in the public?

17 A. Again, I would say not specifically. Our role  
18 is to increase and promote and improve the well-being of  
19 the residents in L.A. County, health and well-being.

20 Q. I'm going to hand you a copy of what was marked  
21 previously in the deposition of Barbara Ferrer as  
22 Exhibit 6. We don't need to remark it.

23 Have you seen this document before?

24 A. I have, yes.

25 Q. And do you recognize this as an e-mail thread

Brett Morrow

1 between you -- Brett Morrow -- and Marla Tellez and  
2 Elizabeth Ford at Fox?

3 A. I do.

4 Q. And so in the middle of this document, is an  
5 e-mail from you dated August 4th at 5:48 p.m. And this  
6 is a statement from Public Health. It says, "Public  
7 Health has zero tolerance for threats, bullying, or  
8 harassment on any of our platforms and made the decision  
9 to disable social media comments after receiving  
10 concerns from numerous residents who were being  
11 targeted. Residents who wish to share their thoughts  
12 with Public Health on social media can still do so by  
13 sending direct messages to our accounts."

14 Do you recall sending that statement to  
15 Elizabeth Ford and Marla Tellez.

16 A. I don't remember sending it, but I see that  
17 it's been -- I sent the e-mail, but yes. Generally,  
18 yes.

19 Q. And does that accurately summarize why you  
20 decided to disable public comment?

21 MR. RAYGOR: Objection. Mischaracterizes the  
22 statement. Lacks foundation.

23 THE WITNESS: I would say it's a part of.

24 Q. (By Ms. Hamill) It's a part of. And what's  
25 missing?

1 A. Misinformation.

2 Q. Is there anything else that's missing?

3 A. Not that I can think of at the moment.

4 Q. And so you mentioned receiving concerns from  
5 numerous residents. How were those concerns received?

6 A. There were people who sent us direct messages  
7 and e-mails.

8 Q. And what did those messages and e-mails say?

9 A. I can't remember the specifics. Just saying  
10 that they were concerned that the comments were just a  
11 negative space.

12 Q. Did they feel threatened?

13 A. I don't remember people saying directly that  
14 they've been threatened.

15 Q. Did you ever advise any of those concerned  
16 residents to report the posts?

17 A. I don't recall.

18 Q. Did you discuss this statement in Exhibit 6  
19 with Dr. Ferrer before sharing it with Fox?

20 A. I don't remember.

21 Q. Did you write this statement?

22 A. I don't remember, but I believe so.

23 Q. Is this something that you would consider  
24 crisis management?

25 A. No.



Brett Morrow

1 to your experts, and everything else would be  
2 misinformation; is that correct?

3 MR. RAYGOR: Objection. Mischaracterizes his  
4 testimony. Lacks foundation.

5 THE WITNESS: I -- I don't know. It would  
6 depend specifically what the person was referring to. I  
7 can't know in a hypothetical like that.

8 Q. (By Ms. Hamill) Okay.

9 Well, you told me you remember a specific  
10 instance of someone inflating -- or saying that the case  
11 numbers were inflated.

12 A. Um-hum.

13 Q. And so I'm just wondering how you made the  
14 determination that that was misinformation.

15 MR. RAYGOR: Asked and answered.

16 THE WITNESS: We rely on our experts and -- our  
17 public health experts and our leadership team.

18 Q. (By Ms. Hamill) I mean you specifically.

19 A. Me, specifically?

20 MR. RAYGOR: Asked and answered.

21 THE WITNESS: I rely on -- yeah, I rely on our  
22 Public Health experts.

23 Q. (By Ms. Hamill) And so saying anything that  
24 deviated from what was coming out of Ferrer's office  
25 would be considered misinformation.

Brett Morrow

1 MR. RAYGOR: Objection. Improper, incomplete  
2 hypothetical. Lacks foundation. Calls for speculation.

3 THE WITNESS: I wouldn't say it necessarily  
4 that way.

5 Q. (By Ms. Hamill) How would you say it?

6 A. We determine what's credible and also what  
7 makes sense most for the Los Angeles -- Los Angeles  
8 County, and that's what we provide to people, what's  
9 determined to be credible or accurate or making the most  
10 sense for our county's residents.

11 Q. Did you personally receive any training on how  
12 to detect misinformation?

13 A. No.

14 Q. Did you have any concerns about limiting speech  
15 when you disabled the public comments?

16 MR. RAYGOR: I caution you to the extent that  
17 you had communications with counsel on that subject or  
18 any subject that could require the disclosure of  
19 attorney-client privileged information, and I would  
20 instruct you not to answer to the extent that is what  
21 you're thinking of answering.

22 MS. HAMILL: I definitely don't want to hear  
23 anything that your attorney told you.

24 MR. RAYGOR: Or that you told attorneys.

25 MS. HAMILL: If you have an independent thought

Brett Morrow

1 you engaged a community partner to provide clarifying  
2 information?

3 A. I don't remember.

4 Q. Have you considered reopening public comments  
5 on social media?

6 A. No.

7 Q. And that's within your control; correct?

8 A. Technically, yes. My team is the one who  
9 operates the social -- you mean the functionality of  
10 actually turning it on? Yes.

11 Q. And why wouldn't you consider reopening public  
12 comments?

13 A. Because I remain concerned about the spread of  
14 misinformation and how our channels may potentially be  
15 used in inappropriate ways.

16 MS. HAMILL: I am going to attempt to get  
17 through these two sets of documents, and then we'll  
18 break for lunch. Does that sound good?

19 MR. RAYGOR: That's fine.

20 THE WITNESS: Sure.

21 MS. HAMILL: Okay.

22 Q. (By Ms. Hamill) Are you familiar with the alt  
23 account known as @alt\_lacph?

24 A. I am.

25 Q. And were you concerned about that account?

1                   And is it your understanding that

2           Ms. Culbertson was the head of U.S. public policy for  
3           Twitter?

4           A.     Yes, but I don't specifically remember.   I  
5           didn't know her.

6           Q.     How did you get her contact information?

7           A.     Patrick provided it to me.

8                   MR. RAYGOR:   Just a second.   Is this going to  
9           interfere if I put it here?

10                  THE VIDEOGRAPHER:   It's not even working.

11                  MR. RAYGOR:   Okay.

12           Q.     (By Ms. Hamill)   And what did Patrick tell you  
13           about Lauren Culbertson?

14           A.     He didn't tell me anything; he just gave me her  
15           contact information and maybe told me her role.

16           Q.     And what was the context?   Did you reach out to  
17           Patrick for help?

18           A.     I believe so, yes.

19           Q.     And what did you say to Patrick when you  
20           reached out to him?

21           A.     I don't remember.   I think it was something  
22           along the lines that we were concerned about certain  
23           things happening on Twitter.

24           Q.     Why would you contact Mr. Boland?

25           A.     Patrick knows a lot of people.

Brett Morrow

1 Q. But you figured if you had mentioned in all  
2 caps in the subject line "REFERRAL FROM PATRICK BOLAND,"  
3 your e-mail would probably get attention?

4 A. I assume so, yes.

5 Q. And going down to the body of the e-mail, on  
6 this Page 5, it says: "I was referred to you by my  
7 friend Patrick Boland who I used to work with in  
8 Congressman Schiff's office."

9 Why did you feel the need to reference the fact  
10 that you worked in Congressman Schiff's office?

11 A. I don't remember.

12 Q. Is there anything that would refresh your  
13 memory?

14 A. I don't know.

15 Q. Did you have communications with Mr. Boland via  
16 text or e-mail about this issue?

17 A. I don't remember.

18 Q. At the time, do you recall what Congressman  
19 Schiff's role was in the committee on national security  
20 in the United States House of Representatives?

21 A. I don't remember, no.

22 Q. Do you recall any of Mr. Schiff's work with  
23 Section 230 reform?

24 A. I don't, no. I don't know what that is.

25 Q. I'm sorry. I misspoke. He was chairman of the

1 Permanent Select Committee on Intelligence.

2 A. I knew his committee title, yes. I don't know  
3 anything about the work that he was doing.

4 Q. So you knew that he was chair of that  
5 committee.

6 A. Yes. Yes.

7 Q. Okay.

8 And that makes him sound somewhat important;  
9 correct?

10 MR. RAYGOR: Objection. Calls for speculation.

11 THE WITNESS: Somewhat.

12 Q. (By Ms. Hamill) Somewhat. To your knowledge,  
13 did that committee ever investigate social media  
14 companies?

15 A. I have no idea.

16 Q. So when you worked for Schiff's office, were  
17 you ever involved in any sort of investigation of social  
18 media companies?

19 A. No. I was a very junior member of the team.

20 Q. Were you aware of any investigations of social  
21 media companies during your time working for Schiff?

22 A. I was not, no.

23 Q. Are you familiar with Paul Sperry?

24 A. No.

25 Q. How often have you consulted with Patrick

Brett Morrow

1 are in immediate danger. There's a serious risk, and  
2 people are in danger. So you stated that these require  
3 urgent action, and I'm wondering why were they so  
4 urgent? Were they imminently dangerous? Were people at  
5 risk?

6 A. I'm not sure how to answer that. I don't know  
7 how to answer -- I don't know.

8 Q. What action were you hoping Twitter would take  
9 in response to this particular e-mail?

10 A. I was hoping that they would look into whether  
11 or not they violated their terms and conditions.

12 Q. But you'd already reported the tweets using the  
13 report function; correct?

14 A. I believe so, yes.

15 Q. Did you appeal after your reports were not  
16 successful?

17 MR. RAYGOR: Objection. Lacks foundation that  
18 the reports were not successful.

19 THE WITNESS: I don't think I've ever appealed.

20 Q. (By Ms. Hamill) So you reported these tweets.  
21 No action was taken. You told Twitter about them and  
22 asked if they could expedite. So what were you hoping  
23 Twitter would do?

24 A. Expedite their process. I think, at that  
25 point, it had been almost a week, so expedite their

Brett Morrow

1 process of review.

2 Q. Do you recall if any of these tweets that you  
3 mentioned here ultimately were taken down or removed?

4 A. I don't -- I don't know. I don't think so.

5 Q. Did you attempt to provide correct information  
6 in response to any of these tweets on Twitter?

7 MR. RAYGOR: Vague and ambiguous as to what  
8 you're referring to by "these tweets."

9 THE WITNESS: I don't believe so.

10 Q. (By Ms. Hamill) Can you explain how the  
11 comment that Dr. Barbara Ferrer is a fake doctor is an  
12 example of misinformation that required urgent action.

13 A. I think it sought to undermine her credibility  
14 as a Ph.D. and spread misinformation about her ability  
15 to lead the response.

16 (Stenographer clarification.)

17 Q. (By Ms. Hamill) Can you explain how the  
18 statement that L.A. County is lying about  
19 hospitalization numbers is an example of misinformation  
20 that requires urgent action.

21 A. It was in reference to the severity of the  
22 pandemic at the time.

23 Q. And then going to the first bullet point on  
24 Page 4 of this exhibit, the Phillips tweet, you said,  
25 "CDC is not recommending masks. For example" -- and



Brett Morrow

1 Did you ever talk to Coral or anyone in Health  
2 Services about these town hall videos?

3 A. I believe I had an exchange with Coral about  
4 it, yes.

5 Q. Do you recall the contents of that exchange?

6 A. I believe she told me that they were putting  
7 out a clarifying statement.

8 Q. Did you ask her to do that?

9 A. No.

10 Q. So Coral reached out to you to tell you that  
11 they were going to put out a clarifying statement?

12 A. If I remember correctly, yes.

13 Q. And there was no prompting from you or your  
14 team?

15 A. No. We typically don't tell other departments  
16 what to do.

17 Q. So why would Coral reach out to you to tell you  
18 that?

19 MR. RAYGOR: Calls for speculation.

20 THE WITNESS: I don't know.

21 Q. (By Ms. Hamill) You have no idea why?

22 MR. RAYGOR: Asked and answered.

23 THE WITNESS: We both work for the County,  
24 so -- and I think -- I can't explain further.

25 Q. (By Ms. Hamill) So looking at this document

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1 that was marked as Exhibit 9 to the deposition of  
2 Barbara Ferrer, was there anything in this thread that  
3 concerned you in your capacity as the Chief  
4 Communications Officer for the department?

5 A. I can't really read all of it. I think the  
6 tweet at the bottom, from "pavement" -- I can't read the  
7 numbers -- I think that that's misinterpreting the video  
8 and adding additional context on top of what was said,  
9 and I can't -- I can't make out the words on this other  
10 one; all of them, at least.

11 Q. So the "pavement" tweet says, "I encourage  
12 anyone who believes there is a COVID emergency in L.A.  
13 to watch today's L.A. County USC press conference. Read  
14 through this thread too."

15 So that was concerning to you.

16 A. Correct, yes.

17 Q. Did you want that tweet to be removed?

18 A. I don't remember. I don't remember.

19 Q. Did you report that tweet for misinformation?

20 A. I don't remember.

21 Q. And the tweet above -- I agree; I can't read  
22 what it says, but there is a -- an image shared that  
23 says, "Snowflake weepies pay Sheila's big salary.  
24 Nepotism equals three years of masks."

25 Did this particular tweet concern you?

Brett Morrow

1 A. I don't remember. I don't remember necessarily  
2 seeing the tweet at the time. I can't remember if it  
3 concerned me at the time.

4 Q. In your capacity as the Chief Communications  
5 Officer, did you attempt to manage Dr. Ferrer's  
6 reputation by getting tweets about nepotism removed?

7 A. I don't believe so.

8 Q. Were you concerned about her reputation?

9 A. As our leader, I feel as though her reputation  
10 is important in order for her to provide accurate  
11 information to the residents, and so I feel as though  
12 her credibility is important, yes.

13 Q. Did you do anything to try and protect her  
14 credibility or reputation?

15 A. Not that I really remember.

16 Q. I'm showing you what was previously marked as  
17 Exhibit 10 to the deposition of Barbara Ferrer.

18 (Stenographer clarification.)

19 Q. (By Ms. Hamill) Do you recall seeing this  
20 exchange? And I'll let you thumb through.

21 A. Sorry. I didn't see the second page. I don't  
22 recall seeing it, but --

23 (Stenographer clarification.)

24 THE WITNESS: I don't recall seeing it at the  
25 time, but I'm certain it happened.

Brett Morrow

1 Q. Is it the same for Twitter?

2 A. I believe so, but I think Twitter kind of  
3 auto-populates it. It may remember that this is the  
4 setting, as well. And I think similar for Instagram;  
5 you have to do it manually for each post too.

6 Q. So Facebook and Instagram require a little  
7 extra effort.

8 A. Correct, yes.

9 MS. HAMILL: Okay.

10 I believe we're at 21; is that correct? Okay.

11 I'm going to have marked as Exhibit 21 a  
12 Facebook post from L.A. County Department of Public  
13 Health dated August 23rd, 2022.

14 (Exhibit 21 marked for identification.)

15 Q. (By Ms. Hamill) Have you seen this before?

16 A. I'm sure I have, yes.

17 Q. And it looks like there are 41 comments below  
18 this post; is that correct?

19 A. It says there are 41 comments, yes.

20 Q. Why were the comments left open on this  
21 particular post?

22 A. I'm sure it was a mistake by whoever posted it.  
23 Or there are some functions between Instagram and  
24 Facebook where you can cross-post, add content at the  
25 same time, and I think, at times, there were issues with

Brett Morrow

1 turning off the comments or not crossing over to  
2 Facebook if you were cross-posting it on Instagram, and  
3 I think we discovered that later.

4 MS. HAMILL: I'm going to have marked as  
5 Exhibit 22 a post from Los Angeles County Department of  
6 Public Health on Facebook dated August 30th, 2022.

7 (Exhibit 22 marked for identification.)

8 Q. (By Ms. Hamill) Do you recognize this as being  
9 a Facebook post from the L.A. County Department of  
10 Public Health?

11 A. Yes.

12 Q. And are the comments open on this post?

13 A. They appear to be, yes.

14 Q. And why are the comments open on this post?

15 A. I'm assuming because somebody forgot to turn  
16 them off, or it was a similar situation with  
17 cross-posting settings.

18 MS. HAMILL: I'm going to mark as Exhibit 23 a  
19 Facebook post from Los Angeles County Department of  
20 Public Health dated September 1st, 2022.

21 (Exhibit 23 marked for identification.)

22 Q. (By Ms. Hamill) Do you recognize this as being  
23 a Facebook post from the L.A. County Department of  
24 Public Health?

25 A. I do, yes.

Brett Morrow

1 Q. And are the comments open on this post?

2 A. They are.

3 Q. And would it be for the same reasons that you  
4 mentioned before?

5 A. I assume so, yes.

6 Q. So it was a mistake or a cross-posting error?

7 A. Exactly, yes.

8 MS. HAMILL: I'm going to mark as Exhibit 24 a  
9 Facebook post from the L.A. County Department of Public  
10 Health.

11 (Exhibit 24 marked for identification.)

12 Q. (By Ms. Hamill) And this one is dated October  
13 10th, 2022.

14 Do you recognize this as being a Facebook post  
15 from the Los Angeles County Department of Public Health?

16 A. I do.

17 Q. And are the comments open on this post?

18 A. They are.

19 Q. And do you know why the comments are open on  
20 this particular post?

21 A. I assume it's the same reasons.

22 MS. HAMILL: I'm going to mark as Exhibit 25 a  
23 Facebook post from L.A. County Department of Public  
24 Health dated October 13th, 2022.

25 (Exhibit 25 marked for identification.)

Brett Morrow

1 Q. (By Ms. Hamill) Do you recognize this as being  
2 a Facebook post from the L.A. County Department of  
3 Public Health?

4 A. I do.

5 Q. And are the comments open on this post?

6 A. It appears so.

7 Q. And why are these comments open?

8 A. I assume for the same reason.

9 MS. HAMILL: I'm going to mark as Exhibit 26 a  
10 Facebook post from the L.A. County Department of Public  
11 Health dated October 14th, 2022.

12 (Exhibit 26 marked for identification.)

13 Q. (By Ms. Hamill) Do you recognize this as being  
14 a Facebook post from the L.A. County Department of  
15 Public Health?

16 A. I do.

17 Q. And are the comments open on this post?

18 A. They are.

19 Q. For the same reasons as you mentioned before?

20 A. I'm sure.

21 MS. HAMILL: Only a few more here.

22 I'm having marked as Exhibit 27 a post -- a  
23 Facebook post from the L.A. County Department of Public  
24 Health dated October 19th, 2022.

25 (Exhibit 27 marked for identification.)

Brett Morrow

1 Q. (By Ms. Hamill) Do you recognize this as being  
2 a Facebook post from the L.A. County Department of  
3 Public Health?

4 A. I do.

5 Q. And are the comments open on this post?

6 A. They are.

7 Q. And are they open for the same reasons that you  
8 mentioned before?

9 A. I assume so.

10 MS. HAMILL: I'm marking as Exhibit 28 a  
11 Facebook post from the Los Angeles County Department of  
12 Public Health.

13 (Exhibit 28 marked for identification.)

14 Q. (By Ms. Hamill) And this one doesn't appear to  
15 have a date, because it looks like it was probably  
16 posted in the original language.

17 Do you happen to know what language this is?

18 A. It appears to be Korean.

19 Q. And do you recognize this as being a Facebook  
20 post from the L.A. County Department of Public Health?

21 A. I do, yes.

22 Q. And it looks -- based on the dates of the  
23 comments, it looks to be about 34 weeks ago; is that  
24 correct?

25 A. From when the comments are posted, yes.



Brett Morrow

1 Q. And do you know why the comments were left open  
2 on this post?

3 A. I assume similar reasons.

4 MS. HAMILL: I'm having marked as Exhibit 29 a  
5 Facebook post from the L.A. County Department of Public  
6 Health dated October 28th, 2022.

7 (Exhibit 29 marked for identification.)

8 Q. (By Ms. Hamill) Do you recognize this as being  
9 a Facebook post from the L.A. County Department of  
10 Public Health?

11 A. I do, yes.

12 Q. And the comments are open on this post as well;  
13 correct?

14 A. Yes.

15 Q. And do you know why the comments were left  
16 open?

17 A. I assume the same reasons.

18 MS. HAMILL: I'm having marked as Exhibit No.  
19 30 a screenshot from the L.A. County Department of  
20 Public Health Facebook page, the review section.

21 (Exhibit 30 marked for identification.)

22 Q. (By Ms. Hamill) Do you recognize this as being  
23 the Facebook page of the L.A. County Department of  
24 Public Health?

25 A. I do, yes.

Brett Morrow

1 Q. And this is the top of the review section;  
2 correct?

3 A. It appears so, yes.

4 Q. And the review depicted here is from Charles  
5 Bird recommending the L.A. County Department of Public  
6 Health -- talking about investing his last dollar with a  
7 person named Mr. Donald Brian, "who proved to be the  
8 most honest and trustworthy expert trader. He has been  
9 helping me with my trading for a long time now and my  
10 experience has been so amazing earning \$14,000 every two  
11 weeks from my little start-up capital of \$600." Emogi,  
12 emogi, emogi.

13 Have you seen this before?

14 A. I don't recall seeing this before. I may have  
15 at one point.

16 Q. And so you personally have not gone through the  
17 reviews to report them; is that correct?

18 A. To report them, no.

19 Q. But you've reviewed them?

20 A. Maybe scrolled through them quickly.

21 MS. HAMILL: Last exhibit here. I'm going to  
22 have marked as Exhibit 31 reviews from the L.A. County  
23 Department of Public Health Facebook page.

24 (Exhibit 31 marked for identification.)

25 Q. (By Ms. Hamill) Do you recognize this as being

Brett Morrow

1 a screenshot from the review section of the Facebook  
2 page of the L.A. County Department of Public Health?

3 A. It appears so, yes.

4 Q. And the first review here from Tiffany Irving  
5 is talking about an herbal doctor who cured HSV and then  
6 Lebong -- Lebo -- Lebogang. I'm sorry. I cannot  
7 pronounce the second tweet name -- or the second review  
8 name. This one talks about herpes cures and herbal cure  
9 for herpes. And then the third one is from Salvador  
10 Fraias talking about herpes herbal cures again.

11 Have you seen these reviews?

12 A. I may have in quickly scrolling through them.

13 Q. But you haven't reported these to Facebook.

14 A. No.

15 Q. Do you think that it's harmful to L.A. County  
16 Department of Public Health to have these reviews  
17 publicly posted on its Facebook page?

18 A. I don't -- I'm not sure. I don't think --  
19 there's not a lot of traffic to this page. I don't  
20 think it's beneficial, but I also don't think it's a  
21 crisis or an emergency as well.

22 Q. If people want to get herbal herpes cures, they  
23 know where to look.

24 MR. RAYGOR: Objection. Calls for speculation.

25 Not a question.

OPINION • Opinion

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# Bringing back a mask mandate in Los Angeles County is unjustified



Dr. Barbara Ferrer, Director of Public Health speaks during an event kicking off Coronavirus Vaccinations for Children at Eugene A. Obregon Park in Los Angeles on Wednesday, November 3, 2021. (Photo by Keith Birmingham, Pasadena Star-News/ SCNG)

By **SCOTT BALSITIS, JEFFREY KLAUSNER, HOUMAN HEMMATI** and **NEERAJ SOOD**

PUBLISHED: July 22, 2022 at 6:24 p.m. | UPDATED: July 25, 2022 at 11:53 a.m.



COMP.EXH.087

EXHIBIT 2

Brett Morrow

7/7/2023

Heather J. Bautista  
CSR 11600, RPR, CRR

Last week, Los Angeles County Public Health Director Barbara Ferrer announced that the county had entered the CDC's "High" tier of community COVID risk, and that a mask mandate is therefore in the works. There's a problem, though: L.A. County isn't actually in the "High" tier.

The CDC now classifies the COVID risk in each county with a metric called "Community Levels" that incorporates both case counts and hospitalization rates. The Community Levels system was implemented to ensure that public health recommendations or mandates are not triggered by widespread mild illness, replacing an earlier system that only looked at positive test counts. To enter the "High" risk Community Level, a county must have more than 10 new COVID hospitalizations per 100,000 people over a seven day period. CDC data show L.A. County at 11 per 100,000, so by that measure L.A. County is designated "High."

Beneath those numbers though is a critical error: most of those "COVID hospitalizations" aren't actually caused by COVID. They represent people coming to the hospital for unrelated reasons who just happen to test positive at the time. We know this from Public Health's own data, which reports that since March only 40% of COVID-positive hospitalizations in the county have actually been caused by COVID. If only true COVID hospitalizations are counted to accurately reflect the virus's impact, the county easily drops out of the "High" tier.

According to Los Angeles County Department of Health Services hospital officials, even the 40% number is a large overestimate. In a remarkable video from the day of Dr. Ferrer's mandate announcement, Chief Medical Officer Dr. Brad Spellberg said of COVID admissions at Los Angeles County+USC Medical Center: "90% of the time it is not due to COVID. Only 10% of our COVID-positive admissions are due to COVID. Virtually none of them go to the ICU, and when they do go to the ICU it is not for pneumonia. They are not intubated ... we haven't seen one of those since February." Health Services confirmed these facts in a statement: "We currently have 30 COVID positive patients in the hospital of whom three were admitted for COVID, none of whom are in the ICU."

Hospital epidemiologist Dr. Paul Holtom summarized the situation this way: "As of this morning, we have no one in the hospital who had pulmonary disease due to COVID ... Certainly, there's no reason from a hospitalization-due-to-COVID perspective to be worried at this point."

The problem is not limited to just L.A. County: San Diego Unified School District is re-instituting restrictions based on the same flawed Community Levels metric. In contrast, other counties that are also technically in the "High" tier understand the data and are not even considering mandates. Marin County, for example, separates COVID-positive hospitalizations by cause to avoid confusion.

The case for new mandates is further undermined by the growing scientific literature showing mask mandates to be ineffective. In the pandemic turmoil of 2020, most studies didn't have the ability to compare COVID rates with and without masks in groups that were otherwise carefully matched. Claims of mask efficacy were thus based on studies with no or improper control groups. Other studies have relied on phone surveys or mathematical models rather than direct measurements of infection or transmission, or used contact tracing protocols that excluded counting masked transmission.

Now in mid 2022 we have much better data Exhaustive tracking of in school COVID spread was indistinguishable with and without student mask use in studies in Spain, a conclusion repeated in two separate COVID waves. Studies of student masking with control groups in Georgia, North Dakota, Finland and the UK have all found the same lack of any clear benefit. One randomized controlled trial showed no significant benefit to the mask wearer and a second randomized trial found a slight benefit (and only in older adults) that was not reproduced with a different analysis of the same data.

When researchers repeated a CDC study showing a mask benefit using identical methods but a larger and better dataset, the benefit of masking disappeared.

Influenza transmits by the same aerosol route as COVID, so we must add the results of 10 randomized controlled trials on masking and influenza, which the CDC reviewed and "found no significant effect of face masks on transmission."

All of this explains why White House COVID-19 Response Coordinator Ashish Jha found no difference in Omicron infection rates between mask mandated California and mask mandate-free Florida, or why Alameda County's recent mask mandate produced no difference in COVID rates versus neighboring counties.

Using data that doctors and scientists agree are not accurate to justify an ineffective mandate is terrible policymaking. Public health mandates aren't harmless, especially for children, students, parents, and families, who should not have to enter a fourth school year with restrictions based on fear not science

*Scott Balsitis Ph D trained in pandemic preparedness in the CDC's Emerging Infectious Diseases program, and is currently a viral immunologist and vaccine developer in San Mateo County.*

*Jeffrey Klausner, MD, MPH is clinical professor of Medicine, Infectious Diseases, Population and Public Health, Keck School of Medicine of the University of Southern California. Dr. Klausner is a former CDC medical officer and former San Francisco city and county deputy health officer*

*Houman Hemmati, MD, Ph.D is a Los Angeles-based board-certified physician, pediatric*


*Editor's note: This piece has been updated to clarify Dr. Brad Spellberg's remarks.*

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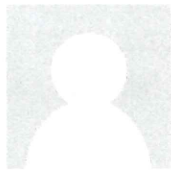
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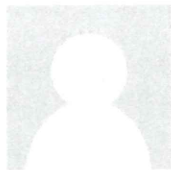
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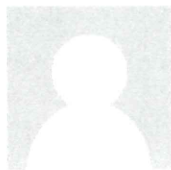
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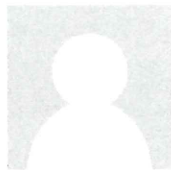
**Scott Balsitis**



**Jeffrey Klausner**



**Houman Hemmati**



**Neeraj Sood**

Message

**From:** Brett Morrow [BMorrow@ph.lacounty.gov]  
**Sent:** 7/30/2022 12:09:59 AM  
**To:** Monique Cisneros [mcisneros@frasercommunications.com]; Erica Lespron [ELespron@ph.lacounty.gov]  
**CC:** Bushra Aljaber [BAljaber@frasercommunications.com]  
**Subject:** Re: Social Posts for Today (7/29)

Let's do it for all posts. I'm over people rn. lol.

**Brett Morrow**

*he/him/his*

Chief Communications Officer  
Los Angeles County Department of Public Health  
213-288-8759 Office  
323-715-7977 Mobile  
bmorrow@ph.lacounty.gov

---

**From:** Monique Cisneros <MCisneros@frasercommunications.com>  
**Sent:** Friday, July 29, 2022 5:01 PM  
**To:** Brett Morrow <BMorrow@ph.lacounty.gov>; Erica Lespron <ELespron@ph.lacounty.gov>  
**Cc:** Bushra Aljaber <BAljaber@frasercommunications.com>  
**Subject:** Re: Social Posts for Today (7/29)

**CAUTION:** External Email. Proceed Responsibly.

Just checking. Do you want comments off on all social posts moving forward? Including daily numbers?

The only comments we got today on the heat post was people asking why we turned off the comments.. otherwise it wasn't bad. Only 8 comments total.

Also, scheduling in advanced doesn't allow us to turn off commenting, so easier if it's all or nothing. Lmk.

---

**From:** Brett Morrow <BMorrow@ph.lacounty.gov>  
**Sent:** Friday, July 29, 2022 3:08:50 PM  
**To:** Monique Cisneros <MCisneros@frasercommunications.com>; Erica Lespron <ELespron@ph.lacounty.gov>  
**Cc:** Bushra Aljaber <BAljaber@frasercommunications.com>  
**Subject:** Re: Social Posts for Today (7/29)

let's hold so we don't flood them.

**Brett Morrow**

*he/him/his*

Chief Communications Officer  
Los Angeles County Department of Public Health  
213-288-8759 Office  
323-715-7977 Mobile  
bmorrow@ph.lacounty.gov

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**From:** Monique Cisneros <MCisneros@frasercommunications.com>  
**Sent:** Friday, July 29, 2022 3:07 PM  
**To:** Brett Morrow <BMorrow@ph.lacounty.gov>; Erica Lespron <ELespron@ph.lacounty.gov>

**EXHIBIT 3**

**Brett Morrow**

**7/7/2023**

Heather J. Bautista  
CSR 11600, RPR, CRR

LACDPH0000418

**COMP.EXH.091**



Cc: Bushra Aljaber <BAIjaber@frasercommunications.com>  
Subject: Re: Social Posts for Today (7/29)

CAUTION: External Email. Proceed Responsibly.

Do we want to retweet this too?

<https://twitter.com/longbeachcity/status/1553118554337120261?s=21&t=aFN1TQRTBMPuHQa7hiMCCw>

---

**From:** Brett Morrow <BMorrow@ph.lacounty.gov>  
**Sent:** Friday, July 29, 2022 1:08:19 PM  
**To:** Monique Cisneros <MCisneros@frasercommunications.com>; Erica Lespron <ELespron@ph.lacounty.gov>  
**Cc:** Bushra Aljaber <BAIjaber@frasercommunications.com>  
**Subject:** Re: Social Posts for Today (7/29)

Good to go to RT John.

**Brett Morrow**

*he/him/his*

Chief Communications Officer  
Los Angeles County Department of Public Health  
213-288-8759 Office  
323-715-7977 Mobile  
bmorrow@ph.lacounty.gov

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**From:** Brett Morrow <BMorrow@ph.lacounty.gov>  
**Sent:** Friday, July 29, 2022 1:05 PM  
**To:** Monique Cisneros <mcisneros@frasercommunications.com>; Erica Lespron <ELespron@ph.lacounty.gov>  
**Cc:** Bushra Aljaber <BAIjaber@frasercommunications.com>  
**Subject:** Re: Social Posts for Today (7/29)

Yep. Let's close comments on all of these too. From here forward. Let me text John about RTing him to get the okay.

**Brett Morrow**

*he/him/his*

Chief Communications Officer  
Los Angeles County Department of Public Health  
213-288-8759 Office  
323-715-7977 Mobile  
bmorrow@ph.lacounty.gov

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**From:** Monique Cisneros <MCisneros@frasercommunications.com>  
**Sent:** Friday, July 29, 2022 11:31 AM  
**To:** Brett Morrow <BMorrow@ph.lacounty.gov>; Erica Lespron <ELespron@ph.lacounty.gov>  
**Cc:** Bushra Aljaber <BAIjaber@frasercommunications.com>  
**Subject:** Social Posts for Today (7/29)

CAUTION: External Email. Proceed Responsibly.

Hi Brett – here are the social posts for today.

LACDPH0000419

COMP.EXH.092

Extreme Heat – done

IVB (IAN)

**IG/FB:** "I'm vaccinated because he needs me." -Ian. Ian understands how serious the Coronavirus is and he wants to keep Isley safe from it by getting vaccinated. Are you vaccinated or boosted? Is your child eligible to get the vaccine?

#ImVaccinatedBecause #ImBoostedBecause #VaccinateNow

"Estoy vacunado porque él me necesita". -Ian. Ian entiende cuán grave es el coronavirus y quiere mantener a Isley a salvo vacunándose. ¿Está vacunado o reforzado? ¿Su hijo es elegible para recibir la vacuna?

#EstoyVacunadoPorque #EstoyReforzadoPorque #VacunateAhora

**TW:** Ian understands how serious the Coronavirus is and he wants to keep Isley safe from it by getting vaccinated. #ImBoostedBecause #VaccinateNow/Ian entiende cuán grave es el coronavirus y quiere mantener a Isley a salvo vacunándose.#EstoyReforzadoPorque #VacunateAhora

<https://trello.com/c/SRU6bcNG>

**RT Suggestions:**

- **John Erickson (Monkeypox influencer)**
  - o <https://twitter.com/johnericksonwh/status/1552798379855319040?s=21&t=aFN1TQRTBMPuHQa7hiM>
  - CCw
  - o <https://twitter.com/johnericksonwh/status/1552469069495881728?s=21&t=aFN1TQRTBMPuHQa7hiM>
  - CCw
- **LACOUNTY Parks (free wellness classes)**  
<https://twitter.com/lacountyparks/status/1553078583387627521?s=21&t=aFN1TQRTBMPuHQa7hiMCCw>
- **West Hollywood West (reporting on weho monkeypox vaccine site soon)**  
<https://twitter.com/whwra/status/1553080606271033345?s=21&t=aFN1TQRTBMPuHQa7hiMCCw>



**Monique Cisneros**

Social Media Manager  
She/Her

**O: 310-566-3616**

**C: 650-740-6413**

**FRASER COMMUNICATIONS**

1631 Pontius Avenue, Los Angeles, CA 90025

**Read our NEW blog post**

**Listen to The Dr. Renee Fraser Show, Why Women KABC 790 AM**

LACDPH0000420



lacounty.gov

**September 9, 2022**

Brenda Duran

bduran@bos.lacounty.gov [mailto:bduran@bos.lacounty.gov]

(213) 974-1746

## **LA County Board of Supervisors to Reopen Board Hearing Room on September 27**

**LOS ANGELES** – The Los Angeles County Board of Supervisors announced today that the Board Hearing Room at the Kenneth Hahn Hall of Administration will reopen to the public on Tuesday, September 27.

“After over two years of no constituents being allowed in the board room due to the COVID-19 pandemic, we are pleased to have reached a point where we can safely resume in-person dialogue with the public we serve and who have a right to be here. The health of our communities and staff remains a priority, which is why we will continue to uphold safety measures so that we can keep the board room open” said Board Chair, Second District Supervisor Holly J. Mitchell.

Los Angeles County moved from a “medium” to “low” COVID-19 community level on September 1, per the Centers for Disease Control and Prevention community rating [[https://www.cdc.gov/coronavirus/2019-ncov/your-health/covid-by-county.html?utm\\_content=&utm\\_medium=email&utm\\_name=&utm\\_source=govdelivery&utm\\_term=](https://www.cdc.gov/coronavirus/2019-ncov/your-health/covid-by-county.html?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=)] system.

As in-person meetings resume, telephonic comment will continue to be available to members of the public.

To ensure the health and safety of those who plan on attending in person, special guidelines will be in place including:

**COMP.EXH.094**

**EXHIBIT 4**

Brett Morrow

7/7/2023

Heather J. Bautista  
CSR 11600, RPR, CRR

- Masking for all in attendance will be required.
- Enhanced air filtration equipment has been installed in the Board Hearing Room.
- Occupancy will be limited to 100 members of the public.

Members of the media will have a designated seating area and will be able to film interviews in the media room upon request.

Remote or online access to specific government services will continue to be available. Residents can check [bos.lacounty.gov](http://bos.lacounty.gov) website for all upcoming scheduled Board meetings. The Board will continue to meet every other week with the opposite week being designated to closed session.



LA Public Health

Actually, yes. My husband is writing an article about the removal of comments on all your social media:

- threats and harassment are terrible (I know, I deal with them all the time) Can you share any examples or quantify or define what you mean by threats and harassment?
- some people think you've turned off comments because that's where Angelenos can connect, OR because the legal department was concerned about first amendment violations for the public to petition for a redress of grievances. Whose idea was it to make the accounts informational?

4:59 PM

Is this for a media outlet?



5:00 PM



Start a message



**EXHIBIT 5**  
 Brett Morrow  
 7/7/2023  
 Heather J. Bautista  
 CSR 11600, RPR, CRR

ALL000136

Message

**From:** bobhoge@gmail.com [bobhoge@gmail.com]  
**Sent:** 8/22/2022 12:25:18 AM  
**To:** media@ph.lacounty.gov  
**Subject:** Hello, a few quick questions

**CAUTION:** External Email. Proceed Responsibly.

Hi there,

I'm a contributor for the Salem Media Group and am writing an article about the removal of comments on all your social media. A couple of quick questions for you:

- Threats and harassment are terrible. Can you share any examples or quantify or define what you mean by threats and harassment?
- Some people think you've turned off comments because that's where Angelenos can connect, OR because the legal department was concerned about first amendment violations for the public to petition for a redress of grievances on a public forum that you created. Whose idea was it to make the accounts informational?
- Does saying the account is informational have anything to do with the lawsuit being brought by the Alliance of LA County Parents against LAPH and Dr. Ferrer?

Thanks in advance!

Sincerely,

Bob Hoge



LACDPH0000014

**COMP.EXH.097**



LA Public Health  
@lapublichealth

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COMP.EXH.098

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## Direct Messages

Mar 6

View on Twitter



Mar 10  
<https://t.co/x3seZM8hgE>



Mar 9  
Hello! Thank you for reaching out to the De...



Mar 6  
Dr. Amir Guerami



Mar 5  
<https://t.co/TjXR4tjgLI>



Feb 25  
<https://t.co/CUwRpgOvjF>



Feb 24  
Wow. Still knowingly pushing a vaccine the...



Feb 23  
The vax is killing people and 95% of Ameri...



Feb 22  
Hello. What evidence are you using to justi...

To whom it may concern: I'm an outpatient physician working in LA County. We have practiced safe COVID protocol since the inception of the pandemic. However, the mandated mask requirement for outpatient offices is, at this time, too restrictive and should be lifted. Patients who have COVID symptoms should be wearing masks, and masks should remain optional and available for staff and patients. However, the mandated mask requirements for outpatient services should be lifted.

Dr. Amir Guerami

Mar 6, 2023, 2:07 PM

EXHIBIT 7

Brett Morrow

7/7/2023

Heather J. Bautista  
CSR 11600, RPR, CRR



LA Public Health  
@lapublichealth

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COMP.EXH.099

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### Direct Messages

Feb 22

View on Twitter



Feb 22

The vax is killing people and 95% of Ameri...



Feb 22

Hello. What evidence are you using to justi...



Feb 22

Maybe that'll make you immune to being a ...



Feb 21

2535 Hauser Boulevard Los Angeles, Calif...



Feb 18

What I mean by doctor's place is not a phy...



Feb 17

Hi Maggie, I reached out to Department of ...



Feb 17

Hi Miriam, thank you for reaching out. Plea...



Feb 17

Wilson web:btc9011 .com acct:Adam1986 ...

Hello. What evidence are you using to justify boosters every two months for this tweet? <https://t.co/np8JXokD3Q> <https://t.co/Wl4TYm4Y90>

Feb 22, 2023, 3:50 PM

EXHIBIT 8

Brett Morrow

7/7/2023

Heather J. Bautista  
CSR 11600, RPR, CRR





**LA Public Health**  
@lapublichealth

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**COMP.EXH.100**

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### Direct Messages

Feb 16

[View on Twitter](#)



Hi Maggie, I reached out to Department of ...



Feb 17  
Hi Miriam, thank you for reaching out. Plea...



Feb 17  
Wilson web:btc9011 .com acct:Adam1986 ...



Feb 17  
@LAFDtalk



Feb 16  
What is the current COVID-19 community ...



Feb 15  
If you can't find what you are looking for, pl...



Feb 7  
<https://t.co/3mnPK8ihn9>



Feb 6  
You're all bound to receive media question...

[Click to go back, hold to see history](#)

What is the current COVID-19 community prevalence percentage?  
Where is the historical time history of that data available?

Feb 16, 2023, 3:58 PM

**EXHIBIT 9**

**Brett Morrow**

**7/7/2023**

Heather J. Bautista  
CSR 11600, RPR, CRR



**LA Public Health**  
@lapublichealth

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**COMP.EXH.101**

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**Direct Messages**

**Dec 16, 2022**

View on Twitter



Dec 19, 2022

Hello & thank you for reaching out to us! If ...



Dec 19, 2022

<https://t.co/2vHrDy2LOA>



Dec 16, 2022

Ferrer said yesterday that masks don't sto...



Dec 15, 2022

<https://t.co/XHOLoxzPfn> #Justice #Vetera...



Dec 15, 2022

Such as an RSS feed or mastadon.



Dec 14, 2022

1590499683298078720 sent a photo



Dec 13, 2022

<https://t.co/gjNEHyM7z9> <https://t.co/dc4Tn...>



Dec 13, 2022

<https://t.co/OFm4nMYbRH> <https://t.co/5Z7...>



Dec 13, 2022

To la public health, to drive up compliance ...

Ferrer recently said that her family had Covid. Did they not follow your advice to mask while with family when someone has Covid? If Ferrer's family won't follow her advice what does that say about her guidance?

Dec 4, 2022, 8:18 PM

Following up on this. Did we get an answer about her family masking around others in their own home?

Dec 15, 2022, 12:09 AM

Ferrer said yesterday that masks don't stop exposures and the 10 day rule countdown restarts. This is in direct contrast to last years school guidance. Where you didn't need to quarantine if it was a mask to mask exposure.

At what point do we stop with masking when we say they aren't good enough to stop exposure risk which doesn't actually mean the other person will have Covid

Dec 16, 2022, 1:06 PM

**EXHIBIT 10**

Brett Morrow

7/7/2023

Heather J. Bautista  
CSR 11600, RPR, CRR



LA Public Health  
@lapublichealth

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COMP.EXH.102

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### Direct Messages

Sep 23, 2022

View on Twitter



Sep 24, 2022

When will you open up public comments?



Sep 24, 2022

<https://t.co/cZYV3zEyeT>



Sep 24, 2022

<https://t.co/eYlts6C3Al>



Sep 23, 2022

<https://t.co/4BDxRzHqil>



Sep 23, 2022

When are you going to have masking upda...



Sep 23, 2022

Hi, I'm the Ambassador of Labrado, a new ...



Sep 21, 2022

17397845 sent a photo



Sep 20, 2022

@\* all available @NRA carrying people can...



Sep 18, 2022

When are you going to have masking updates for non skilled nursing facilities? Masks should be recommended, not required. And, you should not restrict access points. Our residents have to walk so much further and that's dangerous in the heat.

Sep 23, 2022, 7:49 AM

EXHIBIT 11

Brett Morrow

7/7/2023

Heather J. Bautista  
CSR 11600, RPR, CRR



**LA Public Health**  
@lapublichealth

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**COMP.EXH.103**

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### Direct Messages

Aug 22, 2022

[View on Twitter](#)



Aug 22, 2022

Cases are down significantly despite the a...



Aug 22, 2022

Great. Thank you. Have a good day.



Aug 22, 2022

Hello, yes, you can get tested for monkeyp...



Aug 22, 2022

I saw that you're accepting Direct Messag...



Aug 22, 2022

Disallowing public comment is a really bad ...



Aug 22, 2022

You cut out any white males in your little t...



Aug 21, 2022

In the future, please do not consider reimpl...



Aug 21, 2022

No problem. Let us know if you need anyth...

Cases are down significantly despite the absence of a mask mandate. How did that happen? You've been telling us that masks are the only way to control the spread. Given this new information, will you drop the ridiculous rules that force my kids to mask for 10 days because of an exposure? Your public comments are closed so I expect a response from you here.

Aug 22, 2022, 2:58 PM

**EXHIBIT 12**

**Brett Morrow**

**7/7/2023**

Heather J. Bautista  
CSR 11600, RPR, CRR

11:07

5G+



**LA Public Health**

4:59 PM

Is this for a media outlet?

5:00 PM

He's a freelance writer for a blog site

5:01 PM

Okay, yes. Best thing for him to do is to email the media inbox (they are a separate team and can help him). Let me grab the email address for you.



5:02 PM

Thanks so much!!

5:02 PM

[media@ph.lacounty.gov](mailto:media@ph.lacounty.gov)



5:03 PM



Start a message



ALL000137



### LA Public Health

Just saying, it may be time to take them down.



Show this thread

Could you please let businesses and schools know that plastic barriers are outdated and unhelpful to stopping the spread of covid? Thanks



1:32 PM



Start a message

