

March 12, 2025

By Email: foia@usaid.gov

Colleen R. Allen Chief FOIA Officer U.S. Agency for International Development 1300 Pennsylvania Avenue, NW USAID Annex, M/MS/IRD, Room 2.4.0A Washington, DC 20523

Dear Ms. Allen,

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, I write seeking records of communications between U.S. Agency for International Development ("Agency") personnel and specific nongovernmental organizations containing certain terms germane to the development and use of tools to censor or manipulate discourse under the guise of countering "misinformation," "disinformation," or "malinformation." Specifically, I request:

- 1. All communications between any Agency personnel using a "usaid.gov" email address and any person with an "asu.edu," "atlanticcouncil.org," "cardiff.ac.uk," "ceip.org," "cepps.org," "cisecurity.org," "design4democracy.org," "eipartnership.net," "graphika.com," "hks.harvard.edu," "ifes.org," "iri.org," "iu.edu," "mitre.org," "ndi.org," "securingdemocracy.org," "solidaritycenter.org," "stanford.edu," "ucla.edu," "umich.edu," "unc.edu," "wilsoncenter.org," or "wisc.edu" email address containing any of the following terms:
 - "AdSense"
 - "codebook"
 - "cognitive infrastructure"
 - "disinformation"
 - "election integrity"
 - "election interference"
 - "hate speech"

- "ISAC"
- "malinformation"
- "MDM"
- "misinformation"
- "natural language processing"
- "reporting portal"
- "whole of society"
- 2. All communications between Mariam Afrasiabi, Kora Andrieu, Mathew Baker, Keti Bakradze, Jared Ford, Maher M. Frijat, Andrew Greer, Adam Kaplan, Lauren Kirby, Nadereh Lee, Taly Lind, Joshua Machleder, Shannon Maguire, Amy Malessa, Laura McKechnie, Michael McNulty, Kyle Novak, Diana Parzik, Marko Pjevic, Lisa Poggiali, Joseph Scheibel, Gloria Steele, Samantha Turner, Sara Werth, Thomas White, or Johanna Wilkie containing any of the following terms:
 - "actor map"
 - "ad network"
 - "AdSense"
 - "authenticity engine"
 - "big tech"
 - "codebook"
 - "cognitive infrastructure"
 - "co-regulatory"
 - "dangerous speech"
 - "digital right"
 - "disinformation"

- "echo chamber"
- "election integrity"
- "election interference"
- "fact check"
- "hate speech"
- "information disorder"
- "internet governance"
- "ISAC"
- "manufactured amplification"
- "malinformation"
- "media literacy"
- "media monitor"
- "microtarget"
- "misinformation"
- "natural language processing"
- "pink slime"
- "platform accountability"
- "platform regulation"
- "prebunk"
- "reporting portal"
- "strategic silence"

Please limit all searches in response to this request from January 1, 2018, through January 1, 2025. Please conduct all searches in a manner that is case

insensitive. That is, records should be retrieved regardless of whether the search terms appear in uppercase, lowercase, or a combination of both. When conducting searches, please include variations of the search terms that contain additional letters at the end, such as plural forms or common suffix variations.

The term "communication" means any transmitted information in any format or medium, whether oral, electronic, by document, or otherwise, including, but not limited to the following: telephone, facsimile, email, text message, MMS or SMS message, WhatsApp, Signal, regular mail, or social media direct message, or any Agency record of such transmission, as defined by 22 C.F.R. § 212.16.

"Communications between" means any communication in which at least one of the enumerated parties is the sender and at least one of the enumerated parties is a recipient, which includes, but is not limited to, communications where one party is cc'd, bcc'd, or some combination thereof.

The phrase "Agency personnel" means employees of the United States Agency for International Development.

This request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent an email is responsive to any request, that request also includes all prior messages sent or received in that email chain, as well as any attachments to the email.

In the interest of expediency and to minimize the research and/or duplication burden on your staff, please send records electronically if possible. If this is not possible, please notify me before sending to the mailing address listed below. If access to this request will take longer than twenty business days, please let me know when I might receive records or be able to inspect the requested records.

If any portion of this request is denied for any reason, please provide written notice of the records or portions of records that are being withheld and cite each specific exemption to the Freedom of Information Act on which the agency relies. Moreover, to the extent that responsive records may be withheld in part, please produce all reasonably segregable portions of those records. Additionally, please provide all responsive documents even if they are redacted in full.

Fee Waiver Request

I request a waiver of all applicable fees associated with this request under 5 U.S.C. § 552(a)(4)(A)(iii). This request is solely for non-commercial purposes. As a

501(c)(3) nonprofit, Alliance Defending Freedom ("ADF") does not have a commercial purpose, and the release of information requested is not in ADF's commercial interest. ADF's mission is to protect religious freedom, free speech, marriage and family, parental rights, and the sanctity of life through pro bono legal advocacy.

The disclosure of the requested information is in the public interest and is likely to contribute significantly to public understanding of government operations and activities. Specifically, disclosure is in the public interest because the requested information relates to the government's funding and development of tools that may be used to censor Americans' speech, which has been covered extensively in national media. ADF plans to use the requested information for analysis, evaluation, and public education, and it plans to disclose such information through social media, broadcast media, press releases, and other media.

If you deny this request for a fee waiver, please advise me in advance of the estimated charges if they are to exceed \$100. Please send me a detailed and itemized explanation of those charges.

If you have any questions or need clarification of this request, please contact me at lspena@adflegal.org.

Respectfully Submitted,

s/<u>P. Logan Spena</u>
P. Logan Spena
Legal Counsel
Alliance Defending Freedom
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Lansdowne, Virginia 20176