

**IN THE SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

MUSLIM ADVOCATES
P.O. BOX 34440
Washington, DC 20043

Plaintiff,

v.

MARK ZUCKERBERG,
[REDACTED]

SHERYL K. SANDBERG,
[REDACTED]

JOEL KAPLAN,
[REDACTED]

KEVIN MARTIN,
[REDACTED]

and FACEBOOK, INC.
1 Hacker Way
Menlo Park, CA, 94025

Defendants.

Case No. 2021 CA _____

**COMPLAINT AND DEMAND
FOR JURY TRIAL**

Plaintiff Muslim Advocates respectfully submits this Complaint against Facebook, Inc. and the company's Chief Executive Officer Mark Zuckerberg, Chief Operating Officer Sheryl Sandberg, Vice President for Global Policy Joel Kaplan, and Vice President for US Public Policy Kevin Martin (collectively, "defendants") for violating the District of Columbia's consumer protection law and bar on fraud, by making false and deceptive statements in the District of Columbia about Facebook's removal of hate speech and other harmful content from its platform.

INTRODUCTION

On October 23, 2019, Facebook's CEO Mark Zuckerberg came to the District of Columbia to testify before the House Financial Services Committee. Under fire for allowing misinformation to run rampant on his company's massive social media platform, Mr. Zuckerberg told the Committee: "I think lying is bad". Ironically, though, since at least April 2018 Mr. Zuckerberg and other senior Facebook executives have engaged in a coordinated campaign to convince the public, elected representatives, federal officials, and non-profit leaders in the nation's capital that Facebook is a safe product by misrepresenting that Facebook takes down or removes any content that violates Facebook's Community Standards or other policies.

Indeed, just seconds before Mr. Zuckerberg observed that "lying is bad" he made the same misleading and false statement that Facebook takes down any content that violates its policies. As Zuckerberg explained, "If anyone, including a politician, is saying things that can cause, that is calling for violence or could risk imminent physical harm, or voter or census suppression when we roll out the census suppression policy, we will take that content down." But this is not remotely true. Facebook has repeatedly been alerted of hate speech and other content that calls for violence in contravention of Facebook's own policies. Yet Facebook has decided not to take down this harmful content that has online and real-life consequences.

The failure of Facebook and its senior executives to abide by their promises to the public, national officials, and civil rights leaders is not limited to high-profile cases involving Donald Trump or white nationalist militias. Every day, ordinary people are bombarded with harmful content in violation of Facebook's own policies on hate speech, bullying, harassment, dangerous organizations, and violence. Hateful, anti-Muslim attacks are especially pervasive on Facebook.

<https://www.govinfo.gov/content/pkg/CHRG-116hhr42452/pdf/CHRG-116hhr42452.pdf> (at 79).

Yet Facebook refuses to “remove” this content or “take it down,” as its executives repeatedly promised that they and the company would do when they learn of such content. Instead, in an effort to convince Congress, civil rights groups, and the public that their product is safe, Facebook’s officials have consistently misrepresented the company’s actual practices when it comes to enforcing Facebook’s own its own standards and policies to keep Facebook free of hate speech and other harmful content.

This failure has amplified the volume of anti-Muslim hate bombarding Facebook users. And the anti-Muslim hate that’s so pervasive on Facebook presents an enormous problem both online and in real life. As a July 2020 civil rights audit commissioned by Facebook itself found, “[f]rom the organization of events designed to intimidate members of the Muslim community at gathering places, to the prevalence of content demonizing Islam and Muslims, and the use of Facebook Live during the Christchurch massacre,” Facebook has created an atmosphere where “Muslims feel under siege on Facebook[.]”² Likewise, a report by Muslim Advocates found that “Facebook is seeding and cultivating anti-Muslim bigotry amongst its users, leading to real world violence.” It also found that “Facebook is indisputably the world’s engine for anti-Muslim violence.”³

Online hate speech has disastrous real-world consequences, especially for Muslims. Facebook has been used, among other things, to orchestrate the Rohingya genocide in Myanmar, mass murders of Muslims in India, and riots and murders in Sri Lanka that targeted Muslims for death. Anti-Muslim hate groups and hate speech run rampant on Facebook with anti-Muslim

² Facebook, Facebook Civil Rights Audit-Final Report at 57 (July 8, 2020), <https://about.fb.com/wp-content/uploads/2020/07/Civil-Rights-Audit-Final-Report.pdf> (“Facebook Civil Rights Audit”).

³ Muslim Advocates, Complicit: The Human Cost of Facebook’s Disregard for Muslim Life at 4 (Oct. 21, 2020), <https://muslimadvocates.org/wp-content/uploads/2020/10/Complicit-Report.pdf> (“Muslim Advocates Report”).

posts, ads, private groups, and other content. Armed, anti-Muslim protests in the United States have been organized on Facebook event pages. The Christchurch, New Zealand, mosque massacres were live-streamed on Facebook. The resulting video was shared via Facebook an untold number of times worldwide. If Facebook's executives had enforced their own Community Standards and policies as they promised, a significant amount of the anti-Muslim hate and real-world damage could have been avoided.

Facebook's executives might believe that they are legally entitled to operate a social media platform that acts as a cesspool for hate. But what its executives certainly cannot do is *misrepresent* to Congress, national civil rights leaders, and its users in the District of Columbia that Facebook does, in fact, remove or take down content that violates its own standards and policies while routinely refusing to do so. Facebook has no free license to make false or deceptive statements in the District of Columbia as part of its longstanding campaign to make Congress and the American people believe that Facebook is a safe product and to discourage increased regulation by Washington. Just as car manufacturers cannot make false statements about the risk of their vehicles to drivers and pedestrians to drive up sales, Facebook and its executives cannot make false statements about the content and groups that they permit to flourish on Facebook in order to convince the public to keep using its platform and drive-up Facebook's massive profits.

Facebook routinely refuses to remove hateful and harmful content because, at least in part, doing so is financially lucrative. But making false and deceptive statements about removing hateful and harmful content is illegal in the District of Columbia.

In this case, Muslim Advocates asks Facebook's leaders to make a clear and simple choice: stop misrepresenting that you will remove content that violates your policies or conform your deeds to your words. Every business that operates in the District of Columbia must follow the same rules, and those rules offer no exception for publicly-traded tech companies.

PARTIES

1. Plaintiff Muslim Advocates is a non-profit organization based in the District of Columbia. Muslim Advocates is a national civil rights organization working in the courts, in the halls of power and in communities to halt bigotry in its tracks. The organization ensures that American Muslims have a seat at the table with expert representation so that all Americans may live free from hate and discrimination. It provides expert representation in the courts, the policy making process, and in the public dialogue so that American Muslims and all people can live free from discrimination.

2. Defendant Mark Zuckerberg (“Zuckerberg”) is the founder, Chairman, and Chief Executive Officer of Facebook, Inc. Zuckerberg is a resident of Palo Alto, California. Over the past three years, he has routinely worked from or in conjunction with Facebook’s office in the District of Columbia, testified before and communicated with Congress about Facebook’s policies and practices, communicated with government officials, leaders of non-profit organizations, and consumers in the District of Columbia, and given direction to Facebook’s leadership and staff in the District of Columbia on taking such actions, including to the other individual defendants in this action. He testified before the U.S. Senate Committees on Commerce and the Judiciary on April 10, 2018,⁴ the U.S. House of Representatives Committee on Energy and Commerce on April 11, 2018,⁵ the U.S. House of Representatives Committee on Financial Services on October 23, 2019,⁶ the U.S. House of Representatives Committee, Subcommittee on Antitrust, Commercial,

⁴ <https://www.commerce.senate.gov/services/files/D2954BE6-3E92-4AAF-881E-84FF975B0DCC>

⁵ <https://energycommerce.house.gov/sites/democrats.energycommerce.house.gov/files/documents/Testimony-Zuckerberg-FC-Hrg-on-Facebook-Transparency-and-Use-of-Consumer-Data-2018-04-11.pdf>

⁶ <https://financialservices.house.gov/uploadedfiles/hhrg-116-ba00-wstate-zuckerbergm-20191023-u1.pdf>

and Administrative Law on July 29, 2020,⁷ the Senate Committee on the Judiciary on November 17, 2020,⁸ and the U.S. House of Representatives Committee on Energy and Commerce on March 25, 2021.

3. Defendant Sheryl K. Sandberg (“Sandberg”) is the Chief Operating Officer of Facebook, Inc. and a member of Facebook’s board of directors. Sandberg is a resident of Menlo Park, California. Over the past three years, she has routinely worked from or in conjunction with Facebook’s office in the District of Columbia, testified before and communicated with Congress about Facebook’s policies and practices, communicated with government officials, leaders of non-profit organizations, and consumers in the District of Columbia, and given direction to Facebook’s leadership and staff in the District of Columbia on taking such actions, including to the other individual defendants in this action. She testified before the U.S. Senate Select Committee on Intelligence on September 5, 2018.⁹

4. Defendant Joel Kaplan (“Kaplan”) is the Vice President for Global Policy of Facebook, Inc. Mr. Kaplan is a resident of Chevy Chase, Maryland. He was previously the Deputy Chief of Staff to former President George W. Bush. Over the past three years, Mr. Kaplan has principally worked from and in conjunction with Facebook’s office in the District of Columbia and has been one of Facebook’s leading officials communicating with policymakers and non-governmental organizations about Facebook’s policies and practices. Upon information and belief, over the past three years Mr. Kaplan has approved and helped to draft and direct the testimony that defendants Mark Zuckerberg, Sheryl Sandberg, and other Facebook officials have provided in writing and orally to Congress. Further, he has briefed or informed such Facebook officials on

⁷ <https://docs.house.gov/meetings/JU/JU05/20200729/110883/HHRG-116-JU05-Wstate-ZuckerbergM-20200729.pdf>

⁸ <https://www.judiciary.senate.gov/imo/media/doc/Zuckerberg%20Testimony.pdf>

⁹ <https://www.intelligence.senate.gov/sites/default/files/documents/os-ssandberg-090518.pdf>

what messages to communicate to Congress. And Mr. Kaplan has accompanied and staffed Mr. Zuckerberg and Ms. Sandberg during their appearances before Congress in order to inform, guide, and direct their testimony.

5. Defendant Kevin J. Martin was hired as and initially served as the Vice President for US Public Policy at Facebook; he now leads the firm's global economic policy team. He is a resident of the District of Columbia. Mr. Martin has managed Facebook's public policy since 2015. He served on the Federal Communications Commission from 2001 to 2009, including as its Chairman from 2005 to 2009. Over the past three years, Mr. Martin has principally worked from and in conjunction with Facebook's office in the District of Columbia and has been one of Facebook's leading officials who communicates with policymakers and non-governmental organizations about Facebook's policies and practices. Upon information and belief, over the past three years Mr. Martin has approved and helped to draft and direct the testimony that Mark Zuckerberg, Sheryl Sandberg, and other Facebook officials have provided in writing and orally to Congress, and has briefed or informed such Facebook officials on what messages to communicate to Congress. Mr. Kaplan has accompanied and staffed Mr. Zuckerberg and Ms. Sandberg during their appearances before Congress to inform, guide, and direct their testimony.

6. Defendant Facebook, Inc. is a Delaware corporation whose headquarters are located at 1 Hacker Way, Menlo Park, California 94025. Facebook's Washington, D.C. headquarters are located at 575 Seventh Street, NW, Washington, DC 20004, where Facebook employs at least several hundred professionals who influence the federal government and national leaders, including civil rights leaders. Facebook also employs law firms and lobbyists in the District of Columbia to influence the federal government and national leaders. In 2020, Facebook spent \$19.7 million on federal lobbying, more than any other large technology company, including

substantial lobbying on content policy.⁰

7. Facebook owns and operates the world's most heavily used social networking website. As of December 2020, it had 1.84 billion daily active users and 2.8 billion monthly active users. That means 1.84 billion people in the world use Facebook every day (about 23% of all people globally) and 2.8 billion use it at least once a month (about 36% of all people globally). More than 190 million Americans use Facebook's services, which is almost 60% of the United States' population.² Facebook earned \$85.9 billion of revenue in 2020, \$70.7 billion of revenue in 2019, and \$55.8 billion of revenue in 2018. It earned \$29.1 billion of profit in 2020, \$18.5 billion of profit in 2019, and \$22.1 billion of profit in 2018.³ In each of the last three years, Facebook earned at least tens of millions of dollars in revenues for providing services to users in the District of Columbia.

JURISDICTION

8. This Court has subject-matter jurisdiction under D.C. Code § 11-921(a).

9. This Court has personal jurisdiction under D.C. Code § 13-423(a). The allegations and claims arise from defendants (1) transacting business in the District of Columbia, (2) causing tortious injury in the District of Columbia through acts and omission in the District of Columbia, and (3) causing tortious injury in the District of Columbia through acts and omissions outside of the District of Columbia and regularly doing business in the District of Columbia and deriving

⁰ Lauren Feiner, *Facebook spent more on lobbying than any other Big Tech company in 2020*, CNBC.com (Jan. 22, 2021), <https://www.cnbc.com/2021/01/22/facebook-spent-more-on-lobbying-than-any-other-big-tech-company-in-2020.html>.

<http://d18rn0p25nwr6d.cloudfront.net/CIK-0001326801/4dd7fa7f-1a51-4ed9-b9df-7f42cc3321eb.pdf>

² <https://www.statista.com/statistics/268136/top-15-countries-based-on-number-of-facebook-users/>

³ <http://d18rn0p25nwr6d.cloudfront.net/CIK-0001326801/4dd7fa7f-1a51-4ed9-b9df-7f42cc3321eb.pdf>

substantial revenues from goods or services that are consumed or rendered in the District of Columbia. As described herein, the misrepresentations and statements that give rise to plaintiff's statutory and common law claims were made by the defendants in the District of Columbia while they were transacting business in the District of Columbia, and those misrepresentations caused tortious injuries to Muslim Advocates in the District of Columbia, where it resides. In addition, the defendants have taken actions outside of the District of Columbia that caused injuries in the District of Columbia, and each year the defendants collectively derive at least tens of millions of dollars in revenues including the individual defendants' salaries, benefits, and equity in Facebook for providing services to users in the District of Columbia.

FACTUAL ALLEGATIONS

Facebook's Business and Services

10. Facebook is the world's largest social media platform. It provides digital services to billions of people, allowing them to connect with each other and share information with each other and the public more generally.

11. Facebook does not charge its customers for the services Facebook provides them. Instead, Facebook earns 98% of its revenues from advertisers who pay Facebook to show advertisement to Facebook users on Facebook and Instagram. In 2020, Facebook earned \$84.169 billion in revenues from advertising and \$85.965 billion of revenues overall. ⁴ Facebook's revenue model therefore requires Facebook to find ways to entice users to spend increasing amounts of time on the site. Every additional minute that a Facebook user spends on Facebook's applications, Facebook can show that user additional advertisements for which Facebook receives money from advertisers and hence harvest more dollars from advertisers.

⁴ <http://d18rn0p25nwr6d.cloudfront.net/CIK-0001326801/4dd7fa7f-1a51-4ed9-b9df-7f42cc3321eb.pdf>

12. Facebook offers a number of applications for its users to share and consume information.

13. The Facebook application “enables people to connect, share, discover, and communicate with each other on mobile devices and personal computers,” including through the “Facebook News Feed, Stories, Groups, Shops, Marketplace, News, and Watch.”

14. The News Feed shows a series of their friends’ posts, paid advertisements, and other content curated by Facebook. Users can comment on these posts or share posts with or without their additional comments. Facebook describes the News Feed as “a personalized, ever-changing collection of photos, videos, links, and updates from the friends, family, businesses, and news sources you’ve connected to on Facebook.”⁵

15. The Instagram application “is a place where people can express themselves through photos, videos, and private messaging, and connect with and shop from their favorite businesses and creators. They can do this through Instagram Feed, Stories, Reels, IGTV, Live, Shops, and messaging.”⁶

16. The Messenger application allows Facebook users to communicate directly with other Facebook users through chats similar to text messages.

17. WhatsApp is a similar application for Facebook users to message each other in a private way.

18. Facebook competes with other major social media and technology companies, including Twitter, Google, Apple, Amazon, Microsoft, and LinkedIn.⁷

⁵ <https://www.facebook.com/formedia/solutions/news-feed>

⁶ <http://d18rn0p25nwr6d.cloudfront.net/CIK-0001326801/4dd7fa7f-1a51-4ed9-b9df-7f42cc3321eb.pdf>

⁷ <http://d18rn0p25nwr6d.cloudfront.net/CIK-0001326801/4dd7fa7f-1a51-4ed9-b9df-7f42cc3321eb.pdf>

19. When communicating with members of Congress, leaders, and consumers in the District of Columbia, Facebook and its executives have differentiated Facebook from its competitors in the social media space, such as Twitter, by emphasizing the “Community Standards” and other policies that Facebook purports to enforce on its own platform and how enforcing those standards makes Facebook a safe place for people to use social media.

Facebook’s Community Standards

20. Since at least 2011, Facebook has had “Community Standards” that Facebook purportedly requires its users to follow when posting information or interacting with other users on Facebook. As Facebook’s CEO Mark Zuckerberg told Congress on June 8, 2018, “We require everyone on Facebook to comply with our Community Standards[.]”⁸

21. Facebook’s “Community Standards” have evolved over the past decade and have become more detailed. But they have always prohibited certain types of content or conduct, such as bullying, intimidation, and harassment of other users, as well as threats to others, hate speech, and graphic violence.⁹

22. Facebook’s Community Standards at present define “**Hate Speech**” in the following way:

[W]e don’t allow hate speech on Facebook. It creates an environment of intimidation and exclusion, and in some cases may promote offline violence. We define hate speech as a direct attack against people on the basis of what we call protected characteristics: race, ethnicity, national origin, disability, religious affiliation, caste, sexual orientation, sex, gender identity and serious disease. We define attacks as violent or dehumanizing speech, harmful stereotypes, statements of inferiority, expressions of contempt, disgust or dismissal, cursing, and calls for exclusion or segregation. . . .

⁸ <https://www.commerce.senate.gov/services/files/9D8E069D-2670-4530-BCDC-D3A63A8831C4>

⁹ <https://web.archive.org/web/20110127224041/https://www.facebook.com/communitystandards/> (Jan 27, 2011 community standards);

Do not post:

Content targeting a person or group of people (including all subsets except those described as having carried out violent crimes or sexual offenses) on the basis of their aforementioned protected characteristic(s) or immigration status with:

- Violent speech or support in written or visual form
- Dehumanizing speech or imagery in the form of comparisons, generalizations, or unqualified behavioral statements (in written or visual form) to or about:
 - Insects
 - Animals that are culturally perceived as intellectually or physically inferior
 - Filth, bacteria, disease and feces
 - Sexual predator
 - Subhumanity
 - Violent and sexual criminals
 - Other criminals (including but not limited to “thieves,” “bank robbers,” or saying “All [protected characteristic or quasi-protected characteristic] are ‘criminals’”)
 - Statements denying existence
- Mocking the concept, events or victims of hate crimes even if no real person is depicted in an image
- Designated dehumanizing comparisons, generalizations, or behavioral statements (in written or visual form)- that include:
 - Black people and apes or ape-like creatures
 - Black people and farm equipment
 - Caricatures of Black people in the form of blackface
 - Jewish people and rats
 - Jewish people running the world or controlling major institutions such as media networks, the economy or the government
 - Denying or distorting information about the Holocaust
 - Muslim people and pigs
 - Muslim person and sexual relations with goats or pigs
 - Mexican people and worm like creatures
 - Women as household objects or referring to women as property or “objects”
 - Transgender or non-binary people referred to as “it”
 - Dalits, scheduled caste or ‘lower caste’ people as menial laborers

23. Likewise, Facebook’s Community Standards at present prohibit “**Violent and Graphic Content**,” stating that “We remove content that glorifies violence or celebrates the suffering or humiliation of others because it may create an environment that discourages

participation.”

24. Facebook’s Community Standards at present prohibit “**Violence and Incitement**,” stating that:

We aim to prevent potential offline harm that may be related to content on Facebook. While we understand that people commonly express disdain or disagreement by threatening or calling for violence in non-serious ways, we remove language that incites or facilitates serious violence. We remove content, disable accounts, and work with law enforcement when we believe there is a genuine risk of physical harm or direct threats to public safety. We also try to consider the language and context in order to distinguish casual statements from content that constitutes a credible threat to public or personal safety. In determining whether a threat is credible, we may also consider additional information like a person's public visibility and the risks to their physical safety.

25. Facebook’s Community Standards prohibit “**Dangerous Individuals and Organizations**,” stating that:

In an effort to prevent and disrupt real-world harm, we do not allow any organizations or individuals that proclaim a violent mission or are engaged in violence to have a presence on Facebook. This includes organizations or individuals involved in the following:

- Terrorist activity
- Organized hate
- Mass murder (including attempts) or multiple murder
- Human trafficking
- Organized violence or criminal activity

We also remove content that expresses support or praise for groups, leaders, or individuals involved in these activities.

26. Facebook’s Community Standards at present prohibit “**Coordinating Harm and Publicizing Crime**,” stating that “In an effort to prevent and disrupt offline harm and copycat behavior, we prohibit people from facilitating, organizing, promoting, or admitting to certain criminal or harmful activities targeted at people, businesses, property or animals.”

27. Facebook’s Community standards at present prohibit “**Bullying and Harassment**,” stating that:

Bullying and harassment happen in many places and come in many different forms, from making threats to releasing personally identifiable information, to sending threatening messages, and making unwanted malicious contact. We do not tolerate this kind of behavior because it prevents people from feeling safe and respected on Facebook.

We distinguish between public figures and private individuals because we want to allow discussion, which often includes critical commentary of people who are featured in the news or who have a large public audience. For public figures, we remove attacks that are severe as well as certain attacks where the public figure is directly tagged in the post or comment. For private individuals, our protection goes further: we remove content that's meant to degrade or shame, including, for example, claims about someone's sexual activity. We recognize that bullying and harassment can have more of an emotional impact on minors, which is why our policies provide heightened protection for users between the ages of 13 and 18.

28. Facebook's Community standards at present prohibit "**Cruel and Insensitive**" content, stating that "We believe that people share and connect more freely when they do not feel targeted based on their vulnerabilities. As such, we have higher expectations for content that we call cruel and insensitive, which we define as content that targets victims of serious physical or emotional harm. We remove explicit attempts to mock victims[.]"

Facebook's Executives Have Routinely Stated That Facebook Removes Content That Violates its Community Standards and Policies When the Company Learns of Such Content

29. Over the past years and even longer, Facebook has heavily relied on the existence of its Community Standards and its stated commitment to enforcing those standards and other policies to curry favor with government officials, non-profit leaders, and consumers in the District of Columbia. It has engaged in a coordinated effort to convince them that its product is safe (or safer than people would otherwise think) and increase people's use of Facebook, as well as to prevent governments from regulating Facebook more rigorously and to discourage non-profit leaders from calling for governments to regulate Facebook more stringently or calling on the public to boycott Facebook.

30. As part of this coordinated campaign, Facebook's executives, including the defendants in this action, have made statements aimed at convincing leaders in Congress, federal agencies, civil rights groups, other civil organizations, and consumers in the District of Columbia that Facebook does actively remove or take down content that violates its Community Standards, policies, and other standards they have articulated whenever Facebook learns about such content.

31. Facebook has embarked upon the same efforts in other countries besides the United States, including by promising world leaders that Facebook would remove any content that violates its Community Standards or that is illegal in their countries when those leaders identify such content to Facebook.

32. At numerous high-profile congressional hearings, Facebook's top executives and leaders have repeatedly stated some iteration of the common refrain that if content violates Facebook's Community Standards, policies, or some other articulated standard Facebook will remove the content or take it down.

33. Facebook's executives make repeated pronouncements that they remove or take down certain types of content — such as hate speech, hate groups, or calls for violence — from the platform without any reference to Facebook's community standards. These statements about the content that Facebook removes are part of the same campaigns to convince officials in Washington that Facebook is safe (or at least safer than what people would otherwise think or believe).

34. For instance, when Facebook's CEO Mark Zuckerberg testified before the House Committee on Financial Services on October 23, 2019, he told the Committee: "*If anyone, including a politician, is saying things that can cause, that is calling for violence or could risk imminent physical harm, or voter or census suppression when we roll out the census suppression policy, we will take that content*

down.” (emphasis added).²⁰

35. In his testimony before the Senate Commerce and Judiciary Committees on April 10, 2018, Mr. Zuckerberg also stated that “when content gets flagged to us . . . **if it violates our policies, then we take it down.**”²¹ (emphasis added).

36. The next day, on April 11, 2018, Mr. Zuckerberg emphasized to the House Energy and Commerce Committee that “We do not allow hate groups on Facebook overall. So, if there is a group that their primary purpose or a large part of what they do is spreading hate, we will ban them from the platform overall.”²² He added that when it comes to ads that violate Facebook’s policies, if the ads “are flagged for us we will review and take [them] down if they violate our policies[.]”²³

37. In responding to questions for the record from the Senate Commerce Committee, on June 8, 2018, Mr. Zuckerberg told the Committee that: “Our Community Standards and Ads Policies outline the content that is not allowed on the platform, such as hate speech, fake accounts, and praise, support, or representation of terrorism/terrorists. *When we find things that violate these standards, we remove them.*” (emphasis added).²⁴ He added that “Content that violates our Community Standards is removed when we are made aware of it,” and that “[w]e remove content that violates our policies, regardless of who posted the content.”

²⁰ <https://finance.yahoo.com/news/heres-whos-sitting-behind-mark-zuckerberg-theyre-153151848.html> (at 79).

²¹ <https://www.govinfo.gov/content/pkg/CHRG-115shrg37801/pdf/CHRG-115shrg37801.pdf> (at 18).

²² <https://www.govinfo.gov/content/pkg/CHRG-115hhr30956/pdf/CHRG-115hhr30956.pdf> (at 28).

²³ <https://www.govinfo.gov/content/pkg/CHRG-115hhr30956/pdf/CHRG-115hhr30956.pdf> (at 67).

²⁴ <https://www.commerce.senate.gov/services/files/9D8E069D-2670-4530-BCDC-D3A63A8831C4>

38. When Facebook’s Chief Operating Officer Sheryl Sandberg testified before the Senate Intelligence Committee on September 5, 2018, she told the Committee: “Senators, let me be clear. We are more determined than our opponents, and we will keep fighting. When bad actors try to use our site, we will block them. *When content violates our policies, we will take it down.*” (emphasis added).²⁵

39. This was a similar refrain as Sandberg’s prepared statement in which she stated that “When we find bad actors, we will block them. And *when we find content that violates our policies, we will take it down.*” (emphasis added).²⁶ Pointing to one of Facebook’s Community Standards, she added that “if something is inauthentic . . . we take it down.”²⁷

40. In responding to questions for the record (*i.e.*, questions that members of Congress ask after a hearing for a response from the people who testified) following the same hearing, Sandberg explained that with respect to advertisements that discourage voting, “We also prohibit misrepresentation of who can vote, qualifications for voting, and what information and/or materials must be provided in order to vote. We remove this content when we become aware of it[.]”²⁸

41. Nathaniel Gleicher, the Head of Cybersecurity Policy at Facebook, testified before the House Intelligence Committee on behalf of Facebook on June 18, 2020, that “Groups that promote violence, groups that glorify violence, *we identify, investigate, and we remove them from the platform*

²⁵ <https://www.govinfo.gov/content/pkg/CHRG-115shrg31350/pdf/CHRG-115shrg31350.pdf> (at 8).

²⁶ <https://www.govinfo.gov/content/pkg/CHRG-115shrg31350/pdf/CHRG-115shrg31350.pdf> (at 18).

²⁷ <https://www.govinfo.gov/content/pkg/CHRG-115shrg31350/pdf/CHRG-115shrg31350.pdf> (at 50).

²⁸ <https://www.govinfo.gov/content/pkg/CHRG-115shrg31350/pdf/CHRG-115shrg31350.pdf> (at 112).

whenever we see it.”²⁹ (emphasis added). He added that “we don’t allow symbols that represent hateful organizations or hateful ideologies unless they are put up with context or condemnation. . . . But in a situation where we don’t see either of those, we don’t allow it on the platform and we remove it.”³⁰

42. Likewise, on May 22, 2019, Mr. Gleicher testified before the House Committee on Oversight and Reform, Subcommittee on National Security, on behalf of Facebook that “we remove content that violates our Community Standards, which helps enforce the safety and security of the platform.”³¹ And at a hearing before the House Committee on Veterans Affairs on November 13, 2019, Mr. Gleicher testified on behalf of Facebook that “we do not allow people to misrepresent themselves on Facebook, use fake accounts, artificially boost the popularity of content, or engage in behaviors that otherwise violate our Community Standards.”³²

43. Monika Bickert, the Head of Global Policy Management at Facebook, testified before the Senate Commerce Committee on January 17, 2018 on behalf of Facebook. In her written testimony to the Committee, Bickert wrote: “We [] remove any content that praises or supports terrorists or their actions whenever we become aware of it[.]” In addition, she told the Committee: “We also remove any content that praises or supports terrorists or their actions whenever we become aware of it, and when we uncover evidence of imminent harm, we promptly inform authorities.”

44. On September 18, 2019, Bickert testified before the Senate Commerce Committee

²⁹ <https://www.congress.gov/116/meeting/house/110805/documents/HHRG-116-IG00-Transcript-20200618.pdf> (at 51).

³⁰ <https://www.congress.gov/116/meeting/house/110805/documents/HHRG-116-IG00-Transcript-20200618.pdf> (at 68).

³¹ <https://www.govinfo.gov/content/pkg/CHRG-116hhr36662/pdf/CHRG-116hhr36662.pdf> (at 35).

³² <https://www.congress.gov/116/meeting/house/110183/witnesses/HHRG-116-VR00-Wstate-GleicherN-20191113.pdf> (at 33).

on behalf of Facebook. In her written testimony, she stated unequivocally that “When we find content that violates our standards, we remove it.”

45. Neil Potts, then a Director at Facebook with oversight over the development and implementation of Facebook’s community standards and currently a Vice President of Public Policy at Facebook, testified before the House Committee on the Judiciary on April 9, 2019 on behalf of Facebook. In his written testimony to the Committee, Potts wrote: “We disallow hate speech because it creates an environment of intimidation and exclusion that limits people’s willingness to communicate and share with one another. In fact, Facebook rejects not just hate speech, but all hateful ideologies. *That means that white supremacists are not allowed on our platform under any circumstances*, and we have recently announced a ban on white nationalism and white separatism as well. We will therefore now use our Dangerous Organizations policy to remove from our platform praise, support, or representation of white supremacy, as well as of white nationalism or white separatism, because both ideologies are inextricably linked with white supremacy and with violence more generally. We have already banned more than 200 white supremacist groups because of our Dangerous Organizations policy.” (emphasis added).³³

46. In his responses to questions by members of Congress during the April 9, 2019, hearing, Potts stated that “Facebook embraces the responsibility to make sure our tools are used for good and we take that responsibility seriously. I would like to be clear: there is no place for terrorism or hate on Facebook. *We remove any content that incites violence, bullies, harasses or threatens*, and that’s why we have had longstanding policies against terrorism and hate and why we have invested so heavily in safety and security in the past few years.” (emphasis added).³⁴

³³ <https://www.judiciary.senate.gov/imo/media/doc/Potts%20Testimony.pdf> (at 5).

³⁴ <https://www.congress.gov/event/116th-congress/house-event/109266>

47. Potts further stated in the April 9, 2019 hearing that “Facebook rejects all hateful ideologies. *Our rules have always been clear that white supremacists are not allowed on the platform under any circumstance.* In fact, we have banned more than 200 white supremacist organizations under our dangerous organizations policy, and last month we extended that policy to include a ban on all praise, support and representation of white nationalism and white separatism.”(emphasis added).³⁵

48. During the April 9, 2019 hearing, Potts responded to a question from Representative Pramila Jayapal, who asked if there are still white nationalist pages on Facebook, by stating that “[w]hen we become aware of these pages we will remove them. We do that through a variety of ways, both reactively, when someone reports that to us, *we will remove those pages if they violate our terms.*” (emphasis added).³⁶

49. Upon information and belief, defendants Joel Kaplan and Kevin Martin have approved and/or helped to draft and direct the testimony that Mark Zuckerberg, Sheryl Sandberg, Nathaniel Gleicher, Monika Bickert, and Neil Potts, and other Facebook officials have provided in writing and orally to Congress, and have briefed or informed such Facebook officials on what messages to communicate to Congress, including some or all of the testimony identified in this Complaint.

50. The statements that Facebook’s executives have made to Congress are consistent with statements that Facebook’s spokespeople have made to national and international media to spread the same message about its purported practice of removing all content that violates its standards and policies when Facebook learns of it.

51. For example, in December 2019, a Facebook spokesperson told the *Guardian*

³⁵ <https://www.congress.gov/event/116th-congress/house-event/109266>

³⁶ <https://www.congress.gov/event/116th-congress/house-event/109266>

newspaper that “[n]obody can advocate or advertise hate or violence on Facebook and we remove any violations as soon as we become aware.” And in March 2021, a Facebook spokesperson told the Guardian: “We don’t allow anyone to praise violent actions and we remove content that represents or supports the organisations we ban under our policies.”

52. Over the past three years and even earlier, Facebook has organized at least dozens of meetings with members of Congress and their staff, civil rights groups, including Muslim Advocates, and other leaders that took place in the District of Columbia in order to communicate the same message that Facebook will remove or take down groups or content that violate Facebook’s Community Standards or other policies when such content is flagged or identified to Facebook by third parties. Zuckerberg, Sandberg, Martin and other Facebook leaders have attended these types of meetings during the past three years in which they have repeatedly made statements to the same effect that Facebook will remove any groups or content that violate Facebook Community Standards or other policies when they learn of the content.³⁷

51. These meetings were part of Facebook’s strategy to convince civil rights groups to collaborate with and support Facebook’s leaders rather than to call for boycotts of Facebook or for greater regulation of it. As part of this strategy, Facebook hired former civil rights leaders and law firms to attend these meetings in the District of Columbia in order to vouch for Facebook and encourage the groups to work with Facebook.

³⁷ For example, as the Southern Poverty Law Center explained, Facebook’s officials in private meetings told it “the same thing that Zuckerberg told Congress” about how Facebook would remove hate groups and other groups and content that violates Facebook’s Community Standards. Michael Edison Hayden, *Facebook Has Failed to Stop Anti Muslim Hate Groups, Despite Mark Zuckerberg’s Pledge*, Newsweek (Apr. 20, 2018), <https://www.newsweek.com/facebook-anti-muslim-hate-groups-890338>.

While Facebook’s Executives Were Telling the Public that They Removed Content that Violated its Community Standards, Policies, and other Articulated Standards, They Knew that the Company Routinely Chose Not to Remove Such Content

52. Both before and after making the statements identified in the prior section by Facebook’s executives (Paragraphs 29-51), Facebook routinely did not and does not remove content that clearly violated its Community Standards, policies, and the other standards articulated to Congress, even when such content was flagged or identified to Facebook by third parties including but not limited to Facebook’s standards on “Hate Speech,” “Violent and Graphic Content,” “Violence and Incitement,” “Dangerous Individuals and Organizations,” “Coordinating Harm and Publicizing Crime,” and “Bullying Harassment.”

53. Over the past three years, Facebook’s executives making those statements identified above knew that Facebook routinely did not remove content that violated its Community Standards, policies, and the other standards articulated to Congress, even when such content had been flagged or identified to Facebook by third parties, and they knew that Facebook routinely would not remove such content in the future.

54. Over the past three years and even earlier, Facebook has been repeatedly placed on notice that anti-Muslim hate groups and anti-Muslim content were flourishing on the platform.

55. Despite civil rights groups like Muslim Advocates, other non-profit groups, and numerous individuals and activists putting Facebook on notice of the specific anti-Muslim hate groups and content that clearly violate its Community Standards, policies, and other standards articulated to Congress, Facebook has routinely decided not to remove that content.

56. While there are many types of groups and content that Facebook refuses to remove or take down despite violations of its Community Standards, policies, and other standards articulated to Congress, anti-Muslim groups and content are a leading area where Facebook does not remove such groups or content.

57. Below, plaintiff identifies instances in which Facebook has not removed or taken down anti-Muslim content or groups that violate Facebook’s Community Standards or other standards articulated to Congress even after Facebook has learned of such content or groups. These examples are not exhaustive. They are representative of a larger volume of content and groups that violate Facebook’s Community Standards, policies, and other standards articulated to Congress that Facebook has not removed or taken down during the past three years or earlier despite learning of such groups or content.

Professor Squire’s Research and Flagging Anti-Muslim Groups and Content

58. For example, Elon University Professor Megan Squire, a scholar who has published research about anti-Muslim networks on Facebook,³⁸ has frequently alerted Facebook about groups and content that violate its Community Standards, policies, and other standards articulated to Congress, yet Facebook routinely failed to remove such groups or content.

59. An analysis by Professor Squire of far-right groups on Facebook found a significant cross-over with anti-Muslim hate. Professor Squire found that anti-Muslim attitudes are not only flourishing on the platform, but also acting as a “common denominator” for a range of other extremist ideologies, including xenophobic anti-immigrant groups, pro-Confederate groups, militant anti-government conspiracy theorists, and white nationalists.³⁹

60. On January 16, 2018, an article about Professor Squire’s work was published in “Wired” explaining how she had used the Facebook application programming interface “API” to identify hate groups and their members.⁴⁰

61. On January 30, 2018, Facebook announced that it was changing its API; those

³⁸ <https://drive.google.com/file/d/1DS3HISDF4GwCE7b9acgd5fUUKNy0OLv9/view>

³⁹ <https://www.buzzfeednews.com/article/ishmaeldaro/anti-muslim-content-facebook-groups-study>

⁴⁰ <https://www.wired.com/story/free-speech-issue-antifa-data-mining/>

changes would make the kinds of searches that Professor Squire conducted to do her research on Facebook impossible other than if done by Facebook employees. That change went into effect April 4, 2018.⁴ Facebook did not, however, remove the hate groups identified by Dr. Squire by April 2018.

62. In a report published in September 2018 that analyzed hate groups on Facebook from June 2017 to March 2018, Professor Squire found that anti-Muslim bias served as a common denominator among hate groups around the world, and she identified 202 anti-Muslim hate groups in the United States that operate as groups on Facebook and post anti-Muslim hate content, providing examples and identifying some groups by name. The 202 anti-Muslim hate groups were part of a larger list of 2000 hate groups she identified on the platform.

63. Of the 201 hate groups identified by Professor Squire for her article in September 2018, approximately 101 hate groups remain on the platform as of the date of the filing of this action. All or most of these hate groups and/or content in their groups violate Facebook's community standards, policies, and other standards articulated to Congress.

64. The following are examples of where Professor Squire flagged and identified hate speech for Facebook that violates its Community Standards, policies, or other standards articulated to Congress, but Facebook has decided not to remove or take it down (or did so after initially refusing to remove or take it down for some time).

65. On September 26, 2017, Professor Squire notified Facebook of a group called "American Infidels Alll." Its group description includes the statement: "DO NOT SUBMIT TO aLLAH. Show no mercy. Kill all of them when it starts." Facebook responded to Professor Squire on September 29, 2017 and informed her that it would not remove this group or this content. This

⁴ <https://about.fb.com/news/2018/04/restricting-data-access/>

group and content violated the applicable Facebook’s Community Standards as Hate Speech or Dangerous Organizations.

66. On March 30, 2018, Professor Squire reported to Facebook a group called “Infidels Unite Against Islam.” Its group page contained the language: “Infidels unite against Islam, Islam is a disease, that we must root out.” Professor Squire specifically referenced the Community Standards’ definition of Hate Speech that prohibited “dehumanizing speech including . . . reference or comparison to filth, bacteria, disease, or feces.” Facebook responded on April 1, 2018 and informed her that it would not remove this group or this content.

67. On April 10, 2018, Professor Squire reported to Facebook a group named “Anti-Islam Movement,” a group with a cover photo of the scope of a gun and the caption “72 Virgins Dating Service, The Relationship is up to you . . . We just arrange the meeting.” The group description contained the language: “Lord make me fast and accurate, let my aim be true and my hand faster.” Facebook responded on April 12, 2018, and informed her that it would not remove this group or this content. Later, however, on April 17, 2018, Facebook acknowledged that the group violated its Community Standards and removed it.

68. On April 11, 2018, Professor Squire reported to Facebook a group called “Death to Islam Undercover.” She reported it as violating Facebook’s Community Standards that prohibit “hate groups,” such as “organizations and people dedicated to promoting hatred against protected groups.” As part of those standards, protected groups were defined to include religious affiliation. Facebook responded to this report on April 12, 2018, by informing Professor Squire that it would not remove this group or its content. However, six days later Facebook informed Professor Squire that it had removed some unspecified content from the group, but it would allow the group to remain on the platform.

69. On April 24, 2018, Professor Squire reported to Facebook a group called “Veterans

Against Islamic Filth” as violating Facebook’s Community Standards that prohibited “dehumanizing speech including . . . reference or comparison to filth, bacteria, disease, or feces.”

Facebook responded that it would not remove this group or this content.

70. On April 25, 2018, Professor Squire reported to Facebook a group called “Purge Worldwide (The Cure for the Islamic disease in your country.” The description of the groups stated: “This is an anti Islamic group A Place to share information about what is happening in your part of the world. The meaning of purge Verb: 1) Rid (someone) of unwanted feeling, memory, or condition. 2. Physically remove (something) completely. Noun: An abrupt or violent removal of a group of people.” Professor Squire reported the group for containing “dehumanizing speech including . . . reference or comparison to filth, bacteria, disease, or feces.” Facebook responded by informing her that it would not remove this group or this content.

71. On April 25, 2018, Professor Squire reported a group named “Filth of Islam” to Facebook as violating its Community Standards prohibiting hate speech. The group’s description stated: “This group is for exposing the Filth of Islam and the Moronic Muslims. Some content is, and will be graphic. If something isn’t to your liking, please move past the post. Butthurts will not be tolerated or wanted.” Despite the fact that Facebook’s Community Standards prohibited “reference or comparison to filth” with respect to a religion, Facebook responded to Professor Squire on April 27, 2018 and informed her that it would not remove this group or this content. Later, on May 1, Facebook reported that it had removed some specific content but would not remove the group.

72. On April 25, 2018, Professor Squire reported to Facebook a group called “Death to Murdering Islamic Muslim Cult Members” for violation of Facebook’s Community Standards’ prohibition on hate speech, including “any violent speech or support for death”. The group description included language that “It’s Way Past Time to Wipe Out All Traces of their

‘Murdering Islamic Cult’ and their low Life, Knuckle Dragging, Cave Dwelling, Seventh Century ‘Sick Culture of Death’ Way of Thinking, As Well As Any And All Others That Support or Stand With Them. Just Think How Peaceful The World Will Be When Their Sick Cultural Way of Life is Wiped From The Face Of The Planet.” This group also violated Facebook’s Community Standards on Dangerous Organizations and Individuals as a hate organization. Facebook responded and informed her that it would not remove this group or this content.

Anti-Muslim Hate Speech and Content

73. On many occasions, Muslim Advocates has told Facebook about anti-Muslim groups and content that violate Facebook’s Community Standards, policies and other standards articulated to Congress, including groups and events pages that could have deadly consequences if not removed or taken down immediately.

74. For example, in December 2017 Muslim Advocates presented Facebook with a list of 26 different groups whose pages and content violated Facebook’s Community Standards and that were inconsistent with specific statements and standards that Facebook officials had articulated. But by April 2018, when Mark Zuckerberg testified before Congress, 24 of those 26 groups remained active on Facebook, because Facebook had failed to remove the groups or their content.⁴² Deciding not to remove those groups and content was wholly inconsistent with Mr. Zuckerberg’s pledge to Congress in April 2018 that the company removes content that violates Facebook’s policies and his representation that “We do not allow hate groups on Facebook overall. So, if there is a group that their primary purpose or a large part of what they do is spreading hate, we will ban them from the platform overall.”⁴³

⁴² <https://www.newsweek.com/faceboook-anti-muslim-hate-groups-890338>

⁴³ <https://www.govinfo.gov/content/pkg/CHRG-115hhr30956/pdf/CHRG-115hhr30956.pdf> (at 28).

75. As of April 1, 2021, 19 of those 26 hate groups still had pages and content available on Facebook.

76. In 2019, a major study found that dozens of current and former American law enforcement officers were members of Facebook groups dedicated to anti-Muslim bigotry.⁴⁴ With names such as “Veterans Against Islamic Filth,” “PURGE WORLDWIDE (The Cure for the Islamic disease in your country),” and “Americans Against Mosques,” these groups serve as private forums to share hateful messages about Muslims. Upon information and belief, Facebook was aware of the existence of these groups and the content within them. Failing to remove those groups and content was inconsistent with Mr. Zuckerberg’s pledge to Congress in April 2018 that the company removes content that violates Facebook’s policies and specifically that “We do not allow hate groups on Facebook overall. So, if there is a group that their primary purpose or a large part of what they do is spreading hate, we will ban them from the platform overall.”⁴⁵

77. Perhaps the most notable case of allowing anti-Muslim hate speech that violates the site’s rules involves former President Donald Trump. In 2016, Mr. Zuckerberg decided not to remove a post calling for a ban on all Muslims entering the United States.⁴⁶

78. President Trump’s anti-Muslim posts on Facebook have not been removed (even after he was banned from Facebook in 2021). And Muslim public figures have been regularly threatened and attacked on the platform. On numerous occasions, Muslim public officials in Congress and around the country have been targeted with hateful content even death threats

⁴⁴ Will Carless and Michael Corey, “American cops have openly engaged in Islamophobia on Facebook, with no penalties,” *Reveal News* (June 27, 2019)

⁴⁵ <https://www.govinfo.gov/content/pkg/CHRG-115hhrg30956/pdf/CHRG-115hhrg30956.pdf> (at 28).

⁴⁶ Julia Carrie Wong, “Zuckerberg proves he is Facebook’s editor by allowing Trump’s hate speech.” *The Guardian* (Oct. 21, 2016).

on Facebook and Instagram without Facebook taking action to remove the content.⁴⁷

79. Additionally, two Muslim Congresswomen, Rashida Tlaib and Ilhan Omar, were targeted by an international fake news operation that spread anti-Muslim propaganda on Facebook in violation of Facebook's Community Standards, policies, and other standards articulated to Congress.⁴⁸ Facebook also knowingly allowed the Trump campaign to run multiple, false ads against these congresswomen.⁴⁹ No action was taken by Facebook to remove or take down the ads, despite the fact that the ads violated Facebook's policies prohibiting false news and misrepresentation.

80. For example, Facebook allowed a man charged with threatening to kill Congresswoman Ilhan Omar to post violent and racist content for years and took no action to remove his posts when he was arrested in 2019.⁵⁰

Anti-Muslim Event Pages

81. For years, Facebook's event pages have been used by white nationalists, militias, and anti-Muslim hate groups to organize armed hate rallies targeting mosques and Muslim community centers across the country. Facebook has knowingly permitted white nationalist militias to directly intimidate worshippers and threaten mosques by organizing such actions using Facebook event pages. This violated Facebook's Community Standards, policies, and other standards articulated to Congress, and was inconsistent with specific promises made by Facebook officials with regard to the removal of content.

⁴⁷ Mellissa Nan Burke, "Tlaib not cowed by 'hateful' threats, behavior," *The Detroit News* (Jan. 27, 2019).

⁴⁸ David Smith, Michael McGowan, Christopher Knaus and Nick Evershed, "Revealed: Ilhan Omar and Rashida Tlaib targeted in far-right fake news operation," *The Guardian* (Dec. 5, 2019).

⁴⁹ Andrea Germanos, "Facebook and Twitter urged to suspend Donald Trump after attack on Ilhan Omar," *Salon* (Apr. 15, 2019).

⁵⁰ Jon Swaine, Facebook allowed violent posts by man charged with Ilhan Oman death threat," *The Guardian* (Apr. 16, 2019).

82. In 2016, two Russian Facebook pages organized dueling rallies in front of the Islamic Da'wah Center of Houston.⁵ Heart of Texas, a Russian-controlled Facebook group that promoted Texas secession, played into the stereotype of the state as a land of guns and barbecue and amassed hundreds of thousands of followers. One of their ads on Facebook announced a noon rally on May 21, 2016 to “Stop Islamification of Texas.” A separate Russian-sponsored group, United Muslims of America (stealing the identity of a legitimate California-based Muslim organization), advertised a “Save Islamic Knowledge” rally for the same place and time. The armed protest terrified those inside the religious center.⁵² This material concerning the rallies violated Facebook’s Community Standards and policies related to hate speech and was inconsistent with specific promises made by Facebook officials with regard to the removal of content.

83. Even Facebook’s own civil rights auditors have highlighted the company’s failure to enforce its own Community Standards prohibiting a call to arms during an anti-Muslim protest organized on their events pages in August 2019.⁵³ The auditors described an event page that was used to intimidate attendees of the Islamic Society of North America’s annual convention in Houston, Texas. Despite the fact that this was the second year in a row where this same hate group threatened the conference, it took Facebook more than 24 hours to remove the event page after it learned of it. Facebook later acknowledged that the Houston incident represented an enforcement misstep, and the auditors used this example to conclude that Facebook’s “events policy provides another illustration of the need for focused study and analysis on particular manifestations of hate.”⁵⁴

⁵ Claire Albright, “A Russian Facebook page organized a protest in Texas. A different Russian page launched the counterprotest.” *The Texas Tribune* (Nov. 1, 2017).

⁵² Claire Ballor, “Shariah law protesters, some toting rifles, gather in front of North Texas Islamic center,” *The Dallas Morning News* (June 10, 2017).

⁵³ Facebook Civil Rights Audit.

⁵⁴ *Id.*

84. Even after the Houston incident, this problem persisted. In August 2020, a group of anti-Muslim activists used Facebook to live-stream a hate rally outside a mosque in Milwaukee, Wisconsin. Holding a sign that read “Halt Islam,” anti-Muslim street preacher Ruben Israel yelled hateful, threatening slurs from a megaphone outside the Islamic Society of Milwaukee – sometimes directed at worshippers and mosque staff attempting to enter the building -- the largest mosque in the city. During the protest, Israel used Facebook to broadcast multiple false, offensive slurs and conspiracies about Muslims, shouting about “wicked, perverted Islam” and asking Muslims in the mosques if they have “anything ticking” on them (suggesting they were suicide bombers), and whether they had a pilot’s license (like the perpetrators of 9-11). He also told a Muslim couple near the mosque, “don’t tell me you’re here getting government assistance while you hate our country.” Despite these clear violations of Facebook’s hate speech and live-streaming policies, it took Muslim Advocates alerting the company days after the event before the content was removed.

85. In October 2020, Muslim Advocates published a report about Facebook’s “disregard for Muslim life.”⁵⁵ The report detailed how Facebook’s platform has been used as a driver of anti-Muslim violence in multiple countries, including the United States. If Facebook had actually followed the promises of its executives and swiftly removed anti-Muslim content and groups that violated its Community Standards, policies, and other standards articulated to Congress, it would have significantly reduced the extent to which its platform encouraged and enabled anti-Muslim violence.

86. In May 2020, the Tech Transparency Project found more than 100 American white supremacist groups, many explicitly anti-Muslim, active on Facebook, either on their own group

⁵⁵ <https://muslimadvocates.org/wp-content/uploads/2020/10/Complicit-Report.pdf>

pages and as content that Facebook creates itself through auto-generation.⁵⁶ In response to the report, Facebook only nominally altered some of the auto-generated content, but left the hate groups largely untouched.⁵⁷ This material violated Facebook’s Community Standards, policies and standards articulated to Congress about its removal of groups and content.

87. In March 2021, the Tech Transparency Project issued a report of its investigation that identified 201 militia pages and 13 militia groups on Facebook as of March 18, 2021, more than two months after the January 6, 2021 insurrection at the United States Capitol. This material violated Facebook’s Community Standards, policies and standards articulated to Congress about its removal of groups and content.

Militia Groups

88. In identifying active militia pages, the Tech Transparency Project investigation found that roughly 70% (140) of the Facebook pages had the word “militia” in their name and were thus easily identifiable by Facebook. Thus, if Facebook had done any affirmative monitoring of content that violated its standards or policies – which it purports to do – it would have known that these militia groups were operating on Facebook in violation of its standards and policies.

89. The Tech Transparency Project also found that Facebook itself is auto-generating pages for some militia organizations, effectively expanding the reach of the movement. This material that is created by Facebook, which by its very nature Facebook itself knows about, violated Facebook’s Community Standards, policies and standards articulated to Congress about its removal of groups and content.

90. The Tech Transparency Project further found that Facebook directs users who

⁵⁶ Muslim Advocates Report at 34, <https://muslimadvocates.org/wpcontent/uploads/2020/10/Complicit-Report.pdf>.

⁵⁷ Tech Transparency Project, *White Supremacist Groups*.

“like” certain militia pages toward other militia groups, helping these organizations potentially recruit and radicalize additional Facebook users. The content of these pages routinely violates Facebook’s Community Standards, policies and standards articulated to Congress about its removal of groups and content.

91. The Tech Transparency Project found that some Facebook militia groups are circulating propaganda on behalf of the far-right Proud Boys, whose members have been charged in the Capitol insurrection.⁵⁸ This content routinely violates Facebook’s Community Standards, policies and standards articulated to Congress about its removal of groups and content.

92. On February 1, 2021, the Southern Poverty Law Center published its annual report identifying hate groups in the United States. It identified over 838 hate groups as part of that report. Two months later, as of April 1, 2021, at least 148 of those hate groups have Facebook pages. Many of them have content that is clearly violative of Facebook’s Community Standards and policies. For example, one page included a picture of a Qur’an in a urinal; another compared Congresswoman Ilhan’s hijab to a KKK hood and compared the Congresswoman herself to Hitler; another had the caption “Never forget, Islam did this” captioning a photograph of 9/11. The hate group list published annually by the Southern Poverty Law Center is widely publicized, and Facebook was on notice of its publication.

93. These are not merely isolated instances of Facebook failing to enforce its own standards and policies. They are illustrations of the systemic problem of anti-Muslim hate as part of a larger ecosystem of white supremacist, racist, and Islamophobic groups that Facebook has not only failed to mitigate but has exacerbated by failing to conform its conduct to the promises of executives and even by facilitating it through content creation.

⁵⁸ <https://www.techtransparencyproject.org/articles/facebooks-militia-mess>

94. Indeed, Facebook’s own civil rights audit, completed in July 2020 after sustained pressure from civil rights and human rights groups, identified anti-Muslim hate speech on the platform as a longstanding problem. The auditors hired by Facebook and employed as Facebook’s counsel wrote that “the organization of events designed to intimidate members of the Muslim community at gathering places, to the prevalence of content demonizing Islam and Muslims, and the use of Facebook Live during the Christchurch massacre” created an atmosphere “where Muslims feel under siege on Facebook.”⁵⁹

Additional Incidents of Unremoved Content Causing Real Life Harm

95. In many high-profile incidents, Facebook has decided not to remove content that violated its Community Standards, policies, and other promises made by Facebook executives, even though Facebook knew about that content and should have known that the content could have harmful and even deadly real-life consequences.

96. For example, a United Nations fact-finding mission found that Facebook played a “determining role” in stirring up hatred against Rohingya Muslims in Myanmar.⁶⁰ In a congressional hearing in April 2018, Facebook’s CEO Mark Zuckerberg admitted that there was a problem of hate speech in Myanmar. Yet four months later, a Reuters analysis found that hate speech flourished on Facebook in Myanmar. Reuters found more than 1,000 examples of posts, comments and pornographic images attacking the Rohingya and other Burmese Muslims on Facebook.⁶

⁵⁹ Facebook Civil Rights Audit at 57, <https://about.fb.com/wp-content/uploads/2020/07/Civil-Rights-Audit-Final-Report.pdf>.

⁶⁰ United Nations Office of the High Commissioner for Human Rights, “Myanmar: UN Fact-Finding Mission releases its full account of massive violations by military in Rakhine, Kachin, and Shan States,” United Nations Human Rights Office, September 18, 2018.

⁶ <https://www.reuters.com/investigates/special-report/myanmar-facebook-hate/>

97. The Christchurch, New Zealand, mosque massacres of March 5, 2019 were live-streamed on Facebook⁶² and the videos shared by untold numbers worldwide, despite Facebook’s knowledge that the videos were being shared.⁶³

98. Facebook’s failure to enforce its own standards and policies also led to deadly results at home. In August of 2020, a white supremacist militia group called the Kenosha Guard created a Facebook event that called for people to “take up arms” and defend the city from “evil thugs.”⁶⁴ The event page warned police they would be “outnumbered.” Facebook received at least 455 user reports flagging that event, but Facebook decided not to remove that content, notwithstanding the Community Standards’ prohibition on “calls to arm.”⁶⁵

99. Shortly thereafter, a teenager who answered the call to arms that Facebook refused to remove shot and killed two peaceful protesters in Kenosha, Wisconsin at the very event promoted by the call to arms.⁶⁶ (A third peaceful protester was also shot by the teenager, but survived). Facebook initially claimed that it took down the event page *after* the double murder had occurred. In fact, however, it was the page administrator for the Kenosha Guard that took down the event page, and not Facebook.⁶⁷

⁶² https://www.washingtonpost.com/world/asia_pacific/brenton-tarrant-sentence-new-zealand-mosque-attack-christchurch/2020/08/23/abd51832-e10c-11ea-82d8-5e55d47e90ca_story.html

⁶³ <https://www.theverge.com/2019/3/17/18269453/facebook-new-zealand-attack-removed-1-5-million-videos-content-moderation>

⁶⁴ Kenosha Guard’s calls for people to “take up arms” and defend the city from “evil thugs.” <https://www.reuters.com/article/usa-tech-senate-int/facebook-zuckerberg-says-kenosha-post-did-not-violate-call-to-arms-policy-idUSKBN27Y096>

⁶⁵ <https://www.buzzfeednews.com/article/ryanmac/kenosha-militia-facebook-reported-455-times-moderators>

⁶⁶ <https://muslimadvocates.org/2020/09/facebook-ignored-warnings-about-event-page-abuses-for-years/>

⁶⁷ <https://www.buzzfeednews.com/article/ryanmac/facebook-failed-kenosha>

Donald Trump

100. Until January 6, 2021 when Facebook banned former President Trump from its platform after the violent takeover of the U.S. Capitol inspired by Trump Facebook did not enforce its Community Standards, policies, or other standards articulated to Congress with respect to Trump, even though Trump’s inflammatory posts routinely violated those standards and policies.

101. As noted above, Mr. Zuckerberg told Congress in April 2018 that “If anyone, including a politician, is saying things. . . that is calling for violence or could risk imminent physical harm, or voter or census suppression when we roll out the census suppression policy, we will take that content down.” But as nearly every American knows, in 2020 Trump routinely did all of the things in 2020 that Mark Zuckerberg said Facebook would take down called for violence, risked imminent physical harm to various groups of Americans, and attempted to suppress the vote (including through repeated attacks on lawful, mail-in voting).

102. Despite the fact that Facebook’s executives and their staff carefully monitored Trump’s posts on Facebook, they did not remove any of them. In only the rarest of circumstances, they put warnings on Trump’s posts. Even after Facebook banned Trump from Facebook, after Trump incited a violent takeover of the United States Capitol that left five people dead, Facebook did not remove Trump’s posts that violated Facebook’s standards and policies. They remain on Facebook to this very day.

103. In one of the most famous examples of Trump violating Facebook’s standards and policies, on May 29, 2020, responding to Americans protesting the murder of George Floyd, Trump posted on Facebook that the protesters are “THUGS” and that he had told the governor of Minnesota that “the Military is with him all the way. Any difficulty and we will assume control, but when the looting starts, the shooting starts.”

104. This post was a clear threat that if protesters engage in looting of property, the military or police would shoot them, and an encouragement of the military (or militia) to shoot looters or nearby protesters. Accordingly, it violated Facebook’s ban on “Violence and Incitement,” as “language that incites or facilitates serious violence.” It was shared tens of thousands of times on Facebook.⁶⁸ Despite the fact that Facebook and its CEO Mark Zuckerberg knew that this post violated Facebook’s Community Standards, Mr. Zuckerberg decided that the post would not be removed. This prompted a number of Facebook employees to publicly condemn Mr. Zuckerberg’s refusal to enforce the company’s Community Standards with respect to Trump. Perhaps that’s because Mr. Zuckerberg had told Trump that he was “No. 1 on Facebook” at a private dinner that they had a few months earlier. (This compliment that Mr. Zuckerberg offered to Trump was not true, because Trump’s two Facebook pages combined were not nearly the most followed pages on Facebook.)⁶⁹

Alex Jones

105. Facebook’s dishonesty about its policy is further exemplified by its actions pertaining to radio show host and conspiracy theorist Alex Jones. Jones has promoted a host of conspiracy theories, including that 9/11 was a government-orchestrated operation. He has also said the Sandy Hook school shooting was a “hoax” and that the children killed were actors.

106. In May 2019, Facebook banned Alex Jones from Facebook for calling for or carrying out acts of violence, following hateful ideologies, using hate speech or slurs, and posting content that goes against Facebook’s policies. In doing so, Facebook stated that “[w]e’ve always banned individuals or organizations that promote or engage in violence and hate, regardless of

⁶⁸ <https://www.cnbc.com/2020/06/01/facebook-staff-angry--zuckerberg.html>

⁶⁹ <https://www.businessinsider.com/trump-mark-zuckerberg-dinner-number-one-facebook-2020-1>

ideology.”⁷⁰

107. But Facebook’s CEO Mark Zuckerberg did not believe that Jones was a hate figure, so he overruled his own experts and decided that while Facebook would permanently ban Jones and his company, he and Facebook would still allow posts of support for Jones and his company by other Facebook users. This meant that Jones’s followers could continue to share the content on Facebook that Facebook had already determined violated its policies.⁷

108. In fact, in the 30 days prior to January 6, 2021, content from Jones’ websites, promoting false voter fraud claims telling fans to “prepare for war,” amassed over 1.1 million interactions across Facebook, despite the fact that Jones had been banned well over a year prior.⁷² Researchers found 583 public posts that shared content from Jones’ own domains InfoWars and Banned.video in the 30-day period prior to the United States Capitol riots. These posts linked to a total of 95 unique articles from Jones’ domains and garnered 1,181,893 interactions across Facebook.

109. The articles claimed that former President Trump was the “true leader” and that the election was rigged, fraudulent, and stolen. “They also often used war-like rhetoric when urging readers to travel to Washington, D.C.”⁷³

110. On January 6, 2021, armed insurgents violently attacked law enforcement officials (including Capitol Police and D.C. Metropolitan Police officers) and stormed into the Capitol in an attempt to disrupt the counting of electoral college votes and kill Vice President Mike Pence

⁷⁰ <https://www.theverge.com/2019/5/2/18526964/facebook-ban-alex-jones-laura-loomer-milo-louis-farrakhan>

⁷ <https://www.buzzfeednews.com/article/ryanmac/mark-zuckerberg-joel-kaplan-facebook-alex-jones>

⁷² <https://www.vice.com/en/article/jgqyvg/facebook-helped-alex-jones-share-prepare-for-war-posts-before-the-capitol-riots>

⁷³ <https://www.vice.com/en/article/jgqyvg/facebook-helped-alex-jones-share-prepare-for-war-posts-before-the-capitol-riots>

and members of Congress. Multiple news sources have reported that that attack was substantially planned on Facebook.

111. On behalf of Facebook, Sheryl Sandberg publicly stated that the January 6 attack was planned on platforms other than Facebook, claiming that Facebook had stronger systems to remove false and hateful speech that violates its policies.

112. But that assertion was flatly false. Indeed, the Tech Transparency Project reported that extremist groups had used Facebook for months prior to January 6, 2021, to organize and incite members, in violation of Facebook's standards, policies, and promises to Congress.⁷⁴ If Facebook had affirmatively monitored the content on its platform, as it says it does, it would have known about the extremist groups that were plotting a violent insurrection on its platform.

113. The insurrection planned on Facebook and other social media sites should have come as no surprise. The Tech Transparency Project reported in April 2020 that "boogaloo" groups were using Facebook to prepare for a second civil war. It also reported that members of private boogaloo groups that it flagged later engaged in real or attempted violence.⁷⁵ These groups, pages and content violated Facebook's policies and other promises made by Facebook executives regarding the removal of groups and content.

The Statements by Facebook's Executives Were Misrepresentations

114. As the events in the prior section describe, the repeated statements by Facebook's executives about removing all content and groups that violate Facebook's standards, policies, and other standards articulated to Congress were intentionally false.

115. Those statements were made for the express purpose of falsely communicating to

⁷⁴ <https://www.techtransparencyproject.org/articles/capitol-attack-was-months-making-facebook>

⁷⁵ <https://www.techtransparencyproject.org/articles/facebooks-boogaloo-problem-record-failure>

members of Congress, other federal officials, non-profit leaders, the public, and Facebook's users that Facebook's platform is safe and that the public should continue to use its platform; assuring federal officials that the company could police itself and did not require new legislation or regulations to supervise the company's conduct; attempting to convince leaders of non-profit organizations, such as Muslim Advocates, that they need not spend their energy or resources pushing for additional regulation, scrutiny, or boycotts of the company.

116. By making the statements described above, the defendants represented that the goods and services they provide to hundreds of thousands of District of Columbia residents had characteristics, benefits, standards, and qualities *i.e.*, that Facebook's platform would not have any content that violates Facebook's Community Standards or other policies after Facebook learns about such content or such content is flagged to Facebook by others when Facebook's platform in fact does not have such characteristics, benefits, standards, or qualities.

117. Furthermore, by making these same statements the defendants have misrepresented a material fact: that they supposedly take down or remove all content from Facebook's platform that violates Facebook's Community Standards, policies, and other standards articulated to Congress when Facebook learns about such content or such content is flagged to Facebook by others. As described above, Facebook routinely has not done so.

118. In addition, in making these statements the defendants failed to disclose or adequately disclose a material fact that they routinely decide not to remove or take down content that violates Facebook's Community Standards, policies, and other standards articulated to Congress when Facebook learns about such content or such content is flagged to Facebook by others. Failing to state this material fact has a tendency to mislead consumers into believing that Facebook does, in fact, remove or take down all content that violates its Community Standards, policies, and other standards articulated to Congress when Facebook learns about such content or

when such content is flagged to Facebook by others.

Muslim Advocates' Interactions With Facebook

119. Muslim Advocates is a 501(c)(3) non-profit headquartered in Washington, D.C. Muslim Advocates is a national civil rights organization working in the courts, in the halls of power, and in communities to halt bigotry in its tracks. The organization works to ensure that American Muslims have a seat at the table with expert representation so that all Americans may live free from hate and discrimination.

120. Facebook is the venue for pervasive hate speech – bigotry directed at the Muslim community in the United States and beyond. Despite the repeated promises of Facebook's executives that Facebook will remove content that violates its Community Standards, anti-Muslim hate groups and hate speech run rampant on Facebook. Examples include anti-Muslim posts, ads, private groups, and other content. Facebook has failed to remove vitriolically hateful anti-Muslim content even when specifically asked to do so and when that content violates Facebook's own standards and policies. Facebook's actions in making misrepresentations about removing content that violates its standards and policies and failing to comply with its clear commitments to Congress have thwarted and frustrated Muslim Advocates' mission.

121. The proliferation of hate on Facebook profoundly frustrates the mission and efforts of Muslim Advocates to “halt bigotry in its tracks” and to create a society wherein “all Americans may live free from hate and discrimination.”

122. Since 2013, Muslim Advocates has worked to hold Facebook accountable for the militias, white nationalists, and other hate groups that are using the platform's event pages to direct harassment and violence at vulnerable communities.

123. Over the past five years, because Facebook has made misrepresentations both to Muslim Advocates and to the public about removing hate speech and other content that violates

its Community Standards, policies, and other standards articulated to Congress, Muslim Advocates has been forced to dedicate and divert significant resources to identifying and combating anti-Muslim hate speech and other harmful content disseminated by Facebook. As a result, Muslim Advocates has been forced to spend thousands of hours on these efforts, diverting scarce resources from other types of critical activities, such as counseling victims of Anti-Muslim hate and federal policy advocacy on behalf of the American Muslim community.

124. Since 2013, Muslim Advocates has attended many calls and meetings every year with Facebook staff members to educate them about the dangers of allowing anti-Muslim content to flourish on the platform and not removing content that violates the company's standards and policies, and to urge them to better enforce the company's Community Standards, policies, and other standards articulated to Congress. Over the years, Muslim Advocates has met with senior members of the Facebook team including, but not limited to, Mark Zuckerberg, Sheryl Sandberg, Kevin Martin, and Monika Bickert.

125. In 2014, Muslim Advocates published a report entitled "Click Here to End Hate: Anti-Muslim Bigotry Online & How to Take Action,"⁷⁶ which highlighted examples of anti-Muslim content online, including on Facebook's platform. Muslim Advocates spent well over 200 hours compiling examples of anti-Muslim content, drafting the report, and editing it.

126. In 2015, Muslim Advocates learned that a Facebook page titled "Global Rally for Humanity" called for protests at mosques around the country. The page encouraged "patriots" throughout the United States to set up events in their own town with Facebook pages, telling organizers to "[r]emember to do your homework and find a local mosque in your area." While some organizers have urged participants to leave their weapons at

⁷⁶ <https://muslimadvocates.org/wp-content/uploads/Click-Here-to-End-Hate.pdf>

home, others are urging protesters to exercise “ALL” of their Constitutional Rights, including carrying weapons.

127. Two years later, in 2017, anti-Muslim hate group ACT for America similarly used Facebook to organize two series of protests around the country – the first of which took place during the Islamic holy month of Ramadan. This organizing took place despite claims by Facebook that hate groups do not exist on the platform. Muslim Advocates notified Facebook of the events organized by Act for America. It also raised concerns about how the platform is regularly used by hate groups to plan events targeting Muslims and other communities; some even calling for people to take arms. (Despite the fact that Muslim Advocates has repeatedly expressed concern about the hate group to Facebook officials, ACT for America remains on the platform.)

128. In 2017, news broke that Russian trolls had been using Facebook to impersonate Muslims and Muslim organizations to stir division among Americans despite the fact that Facebook Community Standards do not permit impersonations. When this was revealed, Muslim Advocates and its partners drafted a letter to Facebook demanding, among other things, that the company “fully disclose to the public all of the ads, pages, events, accounts, and posts [Facebook has] traced back to Russian operatives targeting African American, LGBTQ, and Muslim communities.”⁷⁷ Muslim Advocates and its partners sought the support of other community-based organizations and ultimately had 18 other such organizations sign on.

129. In addition, because Facebook made misrepresentations about removing hate speech and other content that violates its Community Standards, policies, and other standards articulated to Congress, Muslim Advocates dedicated well over 100 hours to educate Facebook about anti-Muslim hate speech on its platform and demand that Facebook undertake a full-scale

⁷⁷ https://muslimadvocates.org/files/Letter_19CivilRightsGroupstoFacebook.pdf

civil rights audit of its platform. One of the first of many formal requests for the audit was in a coalition letter that Muslim Advocates joined in 2017. That audit, which began in 2018 and was completed in 2020, found that Facebook had created an environment “where Muslims feel under siege on Facebook.”⁷⁸ Muslim Advocates regularly engaged with the auditors throughout the duration of the audit, ensuring that they closely examined issues of anti-Muslim bigotry including hate groups using Facebook event pages to organize armed events targeting Muslims.

130. Since 2018, Muslim Advocates has dedicated at least 30 hours of work per week (*i.e.*, at least 2,000 hours a year), and often much more, to the effort to rid Facebook of anti-Muslim content that violates Facebook’s standards and policies. Given Muslim Advocates’ size (approximately 20 full-time staff) this is an enormous diversion of resources that could be fruitfully spent elsewhere. The resources that Muslim Advocates has dedicated to that effort would have been spent on counseling victims of hate crimes or discrimination around the country, challenging or opposing discriminatory government policies, and educating American Muslims about their rights.

131. In 2020, Muslim Advocates worked with Senate offices on a letter highlighting concerns about Facebook’s failure to take action to address anti-Muslim bigotry on its various platforms despite knowing of the issue for years.⁷⁹ Muslim Advocates also worked with House offices on a letter to Facebook from members of Congress regarding abuse of the platform “to dehumanize Muslims and stoke violence and genocide against Muslims around the world,”⁸⁰ despite the company’s Community Standards that purport to prohibit dehumanizing language.

⁷⁸ Facebook Civil Rights Audit at 57.

⁷⁹[https://www.coons.senate.gov/imo/media/doc/Coons%20et%20al%20Letter%20to%20Zuckerberg%2011-16-20%20FINAL%20\(001\)%5b1%5d.pdf](https://www.coons.senate.gov/imo/media/doc/Coons%20et%20al%20Letter%20to%20Zuckerberg%2011-16-20%20FINAL%20(001)%5b1%5d.pdf)

⁸⁰ https://debbiedingell.house.gov/uploadedfiles/12.15.20_dingell_letter_to_facebook_-_anti-muslim_content_final.pdf

Muslim Advocates spent at least 60 hours speaking to and educating congressional offices, providing examples of anti-Muslim content on the platform, and reviewing the letters.

132. In addition, because Facebook made misrepresentations about removing hate speech and other content that violates its Community Standards and policies, Muslim Advocates dedicated well over 100 hours to educate Facebook about Anti-Muslim hate speech on its platform and demand that Facebook undertake a full-scale civil rights audit of its platform. That audit was complete in 2020 and found that Facebook had created an environment “where Muslims feel under siege on Facebook.”⁸

133. In 2020, Muslim Advocates, along with the Global Project on Hate and Extremism, published a report entitled “Complicit: The Human Cost of Facebook’s Disregard for Muslim Life.” The report was a comprehensive narrative about how Facebook enables anti-Muslim hate globally and fails to remove anti-Muslim content that violates its Community Standards. Muslim Advocates spent well over at least 100 hours on drafting, editing, and publishing that report.

CLAIMS FOR RELIEF

CAUSES OF ACTION

FIRST CAUSE OF ACTION

D.C. Consumer Protection Procedures Act (“DC CPPA”)

D.C. Code §§ 28-3901, *et seq.*

Brought against all Defendants

134. Plaintiff incorporates by reference and realleges all previous paragraphs.

135. The CPPA establishes a right to truthful information from merchants about the consumer goods and services that they provide to people in the District of Columbia. It is a remedial statute that must be broadly construed.

136. This Count is brought pursuant to the District of Columbia Consumer Protection

⁸ Facebook Civil Rights Audit at 57.

Procedures Act (“CPPA”), D.C. Code §28-3901 *et seq.* This Count is alleged against the defendants on behalf of Muslim Advocates and the general public of the District of Columbia under District of Columbia Code § 28-3905(k)(1)(A), (C), and (D). Muslim Advocates brings this action as a “consumer” under § 28-3905(k)(1)(A), a “nonprofit organization” under § 28-3905(k)(1)(C), and a “public interest organization” under § 28-3905(k)(1)(D)(i). Muslim Advocates does not bring this Count on behalf of a class of consumers or seek to represent a class of consumers.

137. Plaintiff Muslim Advocates is a “non-profit organization” within the meaning of § 28-3901(a)(14), and a “public interest organization” within the meaning of §28-3901(a)(15). As described above, Muslim Advocates is non-profit organization organized under Internal Revenue Code § 501(c)(3), the group is not organized or operated for profit, and one of its purposes is to promote the interests or rights of consumers, namely Muslim consumers.

138. The defendants are all “persons” within the meaning of D.C. Official Code § 283901(a)(1), because defendants Zuckerberg, Sandberg, Kaplan, and Martin, are individuals, and because Facebook is a corporation incorporated in Delaware.

139. All of the defendants provide “goods and services” within the meaning of § 28-3901(a)(7), including services for personal, household, or family purposes. Hundreds of thousands of people in the District of Columbia use the digital communication, messaging, and sharing services available through Facebook, Instagram, Messenger, WhatsApp and related applications. Defendants receive tens of millions of dollars from companies in the District of Columbia and elsewhere to advertise goods and services to hundreds of thousands of District of Columbia residents.

140. D.C. Code § 28-3904 prohibits “[u]nlawful trade practices” and makes it unlawful, “whether or not any consumer is in fact misled, deceived or damaged thereby, for any person to:

- (a) represent that goods or services have a source, sponsorship, approval, certification, accessories, characteristics, ingredients, uses, benefits, or quantities that they do not have; . . .
- (d) represent that goods or services are of particular standard, quality, grade, style, or model, if in fact they are of another;
- (e) mispresent as to a material fact which has a tendency to mislead;
- (f) fail to state a material fact if such failure tends to mislead[.]”

141. The defendants violated D.C. Code § 28-3904(e) by, *inter alia*, misrepresenting a material fact that they routinely and reliably decide not to take down or remove all content from Facebook’s platform that violates Facebook’s Community Standards, policies, and other standards articulated to Congress including, but not limited to, anti-Muslim speech when Facebook learns about such content or such content is flagged to Facebook by others, when Facebook routinely fails to do as promised.

142. The defendants violated D.C. Code § 28-3904(f) by failing to disclose or adequately disclose a material fact that they routinely and reliably decide not to remove or take down all content that violates Facebook’s Community Standards, policies, and other standards articulated to Congress when Facebook learns about such content or such content is flagged to Facebook by others.

143. Failing to state this material fact has a tendency to mislead consumers into believing that Facebook does, in fact, routinely and reliably remove or take down all content that violates its Community Standards, policies, and other standards articulated to Congress when Facebook learns about such content or such content is flagged to Facebook by others. Facebook’s consumers are thus deprived of information about the risk of third-party harms from the product they are using.

144. The defendants knew or should have known that consumers would believe that Facebook does and would routinely and reliably remove or take down all content that violates Facebook's Community Standards, policies, and other standards articulated to Congress when Facebook learns about such content or such content is flagged to Facebook by others.

145. By making the statements described above, the defendants represented that the goods and services that they provide to hundreds of thousands of District of Columbia residents had characteristics, benefits, standards, and qualities *i.e.*, that its platform would not have content that violates Facebook's Community Standards, policies, and other standards articulated to Congress once Facebook learns about such content or such content is flagged to Facebook by others when Facebook's platform does not have such characteristics, benefits, standards, or qualities. Facebook's consumers are thus deprived of information about how their product choices might create harm to others. Accordingly, the defendants have violated D.C. Code § 28-3904(a) and (d).

146. All of the defendants participated in making the statements that give rise to the claims in this action, by making the statements in testimony to Congress or to non-profit leaders in the District of Columbia, or by editing, approving, or otherwise contributing to those statements being made or causing them to be made.

147. All of the defendants significantly and meaningfully participated in the violations of the CPPA as alleged herein.

148. The type of content shown to users of Facebook and the enforcement of standards for what content will be removed or taken down by Facebook go to the heart of the characteristics and benefits that Facebook users enjoy or appreciate, as well as the standards or qualities that consumers experience when using Facebook's services.

149. Reliance is not required by the CPPA. District consumers, including Muslim Advocates, have nevertheless reasonably relied on Defendants' misrepresentations in continuing to operate their Facebook accounts and take other actions that increased Facebook's revenues and profits, and, in turn, increased the income and/or wealth of the other Defendants.

SECOND CAUSE OF ACTION
Fraudulent Misrepresentation

Brought against Defendants Zuckerberg, Sandberg, Martin, and Facebook, Inc.

150. Plaintiff incorporates by reference and realleges all previous paragraphs.

151. Defendants Zuckerberg, Sandberg, Martin and Facebook, Inc. committed the tort of common law fraud or fraudulent misrepresentation.

152. The elements of fraudulent misrepresentation are (1) the defendant made a false representation, (2) in reference to a material fact, (3) that the defendant made with knowledge of its falsity, (4) with an intent to deceive, and (5) reliance was taken based on the representation.

153. As described above, these defendants repeatedly made false statements to Congress and/or civil rights leaders that they routinely and reliably take down or remove all content from Facebook's platform that violates Facebook's Community Standards, policies, and other standards articulated to Congress when Facebook learns about such content or such content is flagged to Facebook by others.

154. As described above, these defendants' statements were made in reference to a material fact, and these defendants knew that those statements were false when they made them. Each of these defendants specifically knew that these statements were critical to public officials, civil rights groups, and consumers having confidence that Facebook would enforce its Community Standards, policies, and other standards articulated to Congress to make Facebook a safer place for its users, reducing the likelihood that Facebook would face more restrictive regulations, and increasing the extent to which consumers used Facebook's social media services.

155. In making these statements, these defendants intended to deceive Plaintiff, public officials, other civil rights groups, and consumers into believing the statements and, thus, having greater confidence in Facebook, deferring any action to regulate or advocate for regulation of Facebook that is tougher than current law, and using Facebook's social media services to a greater degree.

156. These defendants knew that Plaintiff would rely upon their false statements, because they have experience with how lawmakers, civil rights groups, and consumers respond to promises to take concrete and specific actions to make Facebook's platform a safer place. And during the prior three years, they saw that their false statements were working as planned and continued to make or authorize these false statements.

157. Plaintiff in fact reasonably relied upon these defendants' materially false statements to its detriment. At various points during the past three years, Muslim Advocates engaged Facebook and its representatives in a dialogue with other civil rights groups about Facebook's civil rights record. In response to Facebook's statements about how it would take down or remove all content from Facebook's platform that violates Facebook's Community Standards, policies, and other standards articulated to Congress when Facebook learns about such content or such content is flagged to Facebook by others, Muslim Advocates and other civil rights groups continued to engage in a dialogue directly with Facebook about Facebook taking voluntary measures to protect consumers from anti-Muslim hate and other civil rights problems, rather than taking a more hostile position about how Congress should regulate Facebook and its executives more rigorously.

158. These defendants' fraudulent misrepresentations proximately caused Muslim Advocates harm. If Muslim Advocates had known that these representations were false and that Facebook would routinely refuse to remove content that violates its standards and policies, it would not have expended its resources in such a dialogue with Facebook or spent such a substantial

amount of time alerting Facebook to content that violates its standards or policies. Instead, it would have joined and stepped up its own efforts to advocate for regulating Facebook more rigorously, taken more action to call on enforcement agencies to bring legal actions against Facebook, and provided a greater amount of counseling and legal assistance to the communities whom Muslim Advocates serves.

THIRD CAUSE OF ACTION
Negligent Misrepresentation

Brought against Defendants Zuckerberg, Sandberg, Martin, and Facebook, Inc.

159. Plaintiff incorporates by reference and realleges all previous paragraphs.

160. Defendants Zuckerberg, Sandberg, Martin, and Facebook, Inc. committed the tort of negligent misrepresentation.

161. The elements of negligent misrepresentation are (1) the defendant made a false statement or omission of a fact, (2) the statement was in violation of a duty to exercise reasonable care, (3) the false statement or omission involved a material issue, (4) the plaintiff reasonably relied and to its detriment relied on the false information, and (5) the defendant's challenged conduct proximately caused injury to the plaintiff.

162. As described above, these defendants repeatedly made false statements they routinely and reliably take down or remove all content from Facebook's platform that violates Facebook's Community Standards, policies, and other standards articulated to Congress when Facebook learns about such content or such content is flagged to Facebook by others.

163. These statements violated these defendants' duty of reasonable care to provide accurate information to its users, lawmakers, and others about a material aspect of Facebook's services, particularly given their knowledge about Facebook's routine failure to remove or take down content that violates its Community Standards, policies, and other articulated standards when Facebook learns about or is flagged such content by others.

164. As described above, these defendants' statements were made in reference to a material fact or issue, Plaintiff reasonably relied on that false information to its detriment, and these defendants' false statements were the proximate cause of Plaintiff's harm.

FOURTH CAUSE OF ACTION
Aiding and Abetting Fraudulent and Negligent Misrepresentation
Brought against Defendants Kaplan and Martin

165. Plaintiff incorporates by reference and realleges all previous paragraphs.

166. Through their actions as alleged above, defendants Kaplan and Martin aided and abetted the other defendants in making the fraudulent and negligent misrepresentations described above to Congress, non-profit groups, and leaders, and in making other similar misrepresentations.

167. As described above, both Kaplan and Martin were aware of their role in the violations described in Counts 2 and 3, and they knowingly provided substantial assistance to Zuckerberg, Sandberg, and other representatives of Facebook in making misrepresentations to Congress and national leaders about enforcing Facebook's standards and policies, including helping to draft and direct such testimony and statements, and accompanying, briefing, or advising such representatives prior to or during their testimony or meetings in which the misrepresentations were made.

JURY TRIAL DEMAND

The plaintiffs hereby demand a trial by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against the Defendants, and in favor of Plaintiff and the District of Columbia General Public, and grant the following relief:

- a) declaring that defendants' conduct is in violation of the D.C. Consumer Protection Procedures Act;

- b) enjoining defendants' conduct found to be in violation of the D.C. Consumer Protection Procedures Act and ordering corrective advertising;
- c) awarding plaintiff restitution, treble damages, or statutory damages in the amount of \$1,500 per violation of the D.C. Consumer Protection Procedures Act, whichever is greater, but not to exceed \$74,999.
- d) awarding plaintiff damages for Defendants' negligent misrepresentation;
- e) granting plaintiff its costs of prosecuting this action, including attorneys' fees, experts' fees and litigation costs together with interest; and
- f) granting such other relief as this Court may deem just and proper.

April 8, 2021

Respectfully submitted,

/s/ Peter Romer Friedman

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Attorneys for Plaintiff

Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH INFORMATION SHEET

Muslim Advocates

Case Number: _____

vs

Date: April 8, 2021

Mark Zuckerberg, Sheryl K. Sandberg, Joel Kaplan,
Kevin Martin, and Facebook, Inc.

One of the defendants is being sued
in their official capacity.

Name: <i>(Please Print)</i> Peter Romer-Friedman	Relationship to Lawsuit
Firm Name: Gupta Wessler PLLC	<input checked="" type="checkbox"/> Attorney for Plaintiff
Telephone No.: 202-888-1741	<input type="checkbox"/> Self (Pro Se)
Six digit Unified Bar No.: 993376	<input type="checkbox"/> Other: _____

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
Demand: \$ no more than 74,999 Other: _____

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No.: _____ Judge: _____ Calendar #: _____

Case No.: _____ Judge: _____ Calendar#: _____

NATURE OF SUIT: <i>(Check One Box Only)</i> DC Consumer Protection Procedures Act, Fraudulent Misrepresentation, and Negligent Misrepresentation Claims COLLECTION CASES		
A. CONTRACTS		
<input type="checkbox"/> 01 Breach of Contract	<input type="checkbox"/> 14 Under \$25,000 Pltf. Grants Consent	<input type="checkbox"/> 16 Under \$25,000 Consent Denied
<input type="checkbox"/> 02 Breach of Warranty	<input type="checkbox"/> 17 OVER \$25,000 Pltf. Grants Consent	<input type="checkbox"/> 18 OVER \$25,000 Consent Denied
<input type="checkbox"/> 06 Negotiable Instrument	<input type="checkbox"/> 27 Insurance/Subrogation	<input type="checkbox"/> 26 Insurance/Subrogation
<input type="checkbox"/> 07 Personal Property	Over \$25,000 Pltf. Grants Consent	Over \$25,000 Consent Denied
<input type="checkbox"/> 13 Employment Discrimination	<input type="checkbox"/> 07 Insurance/Subrogation	<input type="checkbox"/> 34 Insurance/Subrogation
<input type="checkbox"/> 15 Special Education Fees	Under \$25,000 Pltf. Grants Consent	Under \$25,000 Consent Denied
	<input type="checkbox"/> 28 Motion to Confirm Arbitration Award (Collection Cases Only)	
B. PROPERTY TORTS		
<input type="checkbox"/> 01 Automobile	<input type="checkbox"/> 03 Destruction of Private Property	<input type="checkbox"/> 05 Trespass
<input type="checkbox"/> 02 Conversion	<input type="checkbox"/> 04 Property Damage	
<input type="checkbox"/> 07 Shoplifting, D.C. Code § 27-102 (a)		
C. PERSONAL TORTS		
<input type="checkbox"/> 01 Abuse of Process	<input type="checkbox"/> 10 Invasion of Privacy	<input type="checkbox"/> 17 Personal Injury- (Not Automobile, Not Malpractice)
<input type="checkbox"/> 02 Alienation of Affection	<input type="checkbox"/> 11 Libel and Slander	<input type="checkbox"/> 18 Wrongful Death (Not Malpractice)
<input type="checkbox"/> 03 Assault and Battery	<input type="checkbox"/> 12 Malicious Interference	<input type="checkbox"/> 19 Wrongful Eviction
<input type="checkbox"/> 04 Automobile- Personal Injury	<input type="checkbox"/> 13 Malicious Prosecution	<input type="checkbox"/> 20 Friendly Suit
<input type="checkbox"/> 05 Deceit (Misrepresentation)	<input type="checkbox"/> 14 Malpractice Legal	<input type="checkbox"/> 21 Asbestos
<input type="checkbox"/> 06 False Accusation	<input type="checkbox"/> 15 Malpractice Medical (Including Wrongful Death)	<input type="checkbox"/> 22 Toxic/Mass Torts
<input type="checkbox"/> 07 False Arrest	<input type="checkbox"/> 16 Negligence- (Not Automobile, Not Malpractice)	<input type="checkbox"/> 23 Tobacco
<input checked="" type="checkbox"/> 08 Fraud		<input type="checkbox"/> 24 Lead Paint

SEE REVERSE SIDE AND CHECK HERE IF USED

Information Sheet, Continued

C. OTHERS

- | | |
|---|---|
| <input type="checkbox"/> 01 Accounting | <input type="checkbox"/> 17 Merit Personnel Act (OEA) |
| <input type="checkbox"/> 02 Att. Before Judgment | (D.C. Code Title 1, Chapter 6) |
| <input type="checkbox"/> 05 Ejectment | <input type="checkbox"/> 18 Product Liability |
| <input type="checkbox"/> 09 Special Writ/Warrants
(DC Code § 11-941) | <input type="checkbox"/> 24 Application to Confirm, Modify,
Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 10 Traffic Adjudication | <input type="checkbox"/> 29 Merit Personnel Act (OHR) |
| <input type="checkbox"/> 11 Writ of Replevin | <input type="checkbox"/> 31 Housing Code Regulations |
| <input type="checkbox"/> 12 Enforce Mechanics Lien | <input type="checkbox"/> 32 Qui Tam |
| <input type="checkbox"/> 16 Declaratory Judgment | <input type="checkbox"/> 33 Whistleblower |

II.

- | | | |
|--|---|--|
| <input type="checkbox"/> 03 Change of Name | <input type="checkbox"/> 15 Libel of Information | <input type="checkbox"/> 21 Petition for Subpoena
[Rule 28-I (b)] |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic | <input type="checkbox"/> 19 Enter Administrative Order as
Judgment [D.C. Code § | <input type="checkbox"/> 22 Release Mechanics Lien |
| <input type="checkbox"/> 08 Foreign Judgment/International | 2-1802.03 (h) or 32-151 9 (a)] | <input type="checkbox"/> 23 Rule 27(a)(1)
(Perpetuate Testimony) |
| <input type="checkbox"/> 13 Correction of Birth Certificate | <input type="checkbox"/> 20 Master Meter (D.C. Code § | <input type="checkbox"/> 24 Petition for Structured Settlement |
| <input type="checkbox"/> 14 Correction of Marriage
Certificate | 42-3301, et seq.) | <input type="checkbox"/> 25 Petition for Liquidation |
| <input type="checkbox"/> 26 Petition for Civil Asset Forfeiture (Vehicle) | | |
| <input type="checkbox"/> 27 Petition for Civil Asset Forfeiture (Currency) | | |
| <input type="checkbox"/> 28 Petition for Civil Asset Forfeiture (Other) | | |

D. REAL PROPERTY

- | | |
|--|--|
| <input type="checkbox"/> 09 Real Property-Real Estate | <input type="checkbox"/> 08 Quiet Title |
| <input type="checkbox"/> 12 Specific Performance | <input type="checkbox"/> 25 Liens: Tax / Water Consent Granted |
| <input type="checkbox"/> 04 Condemnation (Eminent Domain) | <input type="checkbox"/> 30 Liens: Tax / Water Consent Denied |
| <input type="checkbox"/> 10 Mortgage Foreclosure/Judicial Sale | <input type="checkbox"/> 31 Tax Lien Bid Off Certificate Consent Granted |
| <input type="checkbox"/> 11 Petition for Civil Asset Forfeiture (RP) | |

/s/Peter Romer-Friedman

Attorney's Signature

04/08/2021

Date



Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

Muslim Advocates

 Plaintiff

vs.

Case Number _____

Mark Zuckerberg

 Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Peter Romer- Friedman

Clerk of the Court

 Name of Plaintiff's Attorney

 Gupta Wessler PLLC, 1900 L Street NW, Suite 312, Washington, DC 20036

 Address

By _____
 Deputy Clerk

(202) 888- 1741

Date **04/08/2021**

 Telephone

如需翻译, 请打电话 (202) 879-4828

Veuillez appeler au (202) 879-4828 pour une traduction

Đề có một bài dịch, hãy gọi (202) 879-4828

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IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

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Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

Muslim Advocates

 Plaintiff

vs.

Case Number _____

Kevin Martin

 Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

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Peter Romer- Friedman

Clerk of the Court

 Name of Plaintiff's Attorney

Gupta Wessler PLLC, 1900 L Street NW, Suite 312, Washington, DC 20036

 Address

By _____
 Deputy Clerk

(202) 888- 1741

Date **04/08/2021**

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CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

Muslim Advocates

 Plaintiff

vs.

Case Number _____

Joel Kaplan

 Defendant

SUMMONS

To the above named Defendant:

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Peter Romer- Friedman

Clerk of the Court

 Name of Plaintiff's Attorney

 Gupta Wessler PLLC, 1900 L Street NW, Suite 312, Washington, DC 20036

 Address

By _____
 Deputy Clerk

(202) 888- 1741

Date **04/08/2021**

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Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

Muslim Advocates

 Plaintiff

vs.

Case Number _____

Sheryl K. Sandberg

 Defendant

SUMMONS

To the above named Defendant:

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Peter Romer- Friedman

Clerk of the Court

 Name of Plaintiff's Attorney

 Gupta Wessler PLLC, 1900 L Street NW, Suite 312, Washington, DC 20036

 Address

By _____
 Deputy Clerk

(202) 888- 1741

Date **04/08/2021**

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Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

Muslim Advocates

 Plaintiff

vs.

Case Number _____

Facebook, Inc.

 Defendant

SUMMONS

To the above named Defendant:

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Peter Romer- Friedman

Clerk of the Court

 Name of Plaintiff's Attorney

Gupta Wessler PLLC, 1900 L Street NW, Suite 312, Washington, DC 20036

 Address

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