

FIRST EDITION / DECEMBER 2022

# Crisis --- of Trust

---

How Can Democracies Protect  
Against Dangerous Lies?

FRANCES MOORE LAPPÉ

---

WITH MAX BOLAND AND RACHEL MADISON

# ***Crisis of Trust***

***How Can Democracies Protect  
Against Dangerous Lies?***

By Frances Moore Lappé  
with Max Boland and Rachel Madison

12.8.22

**1<sup>st</sup> Edition**

Please send comments to:  
[CrisisofTrust@smallplanet.org](mailto:CrisisofTrust@smallplanet.org)

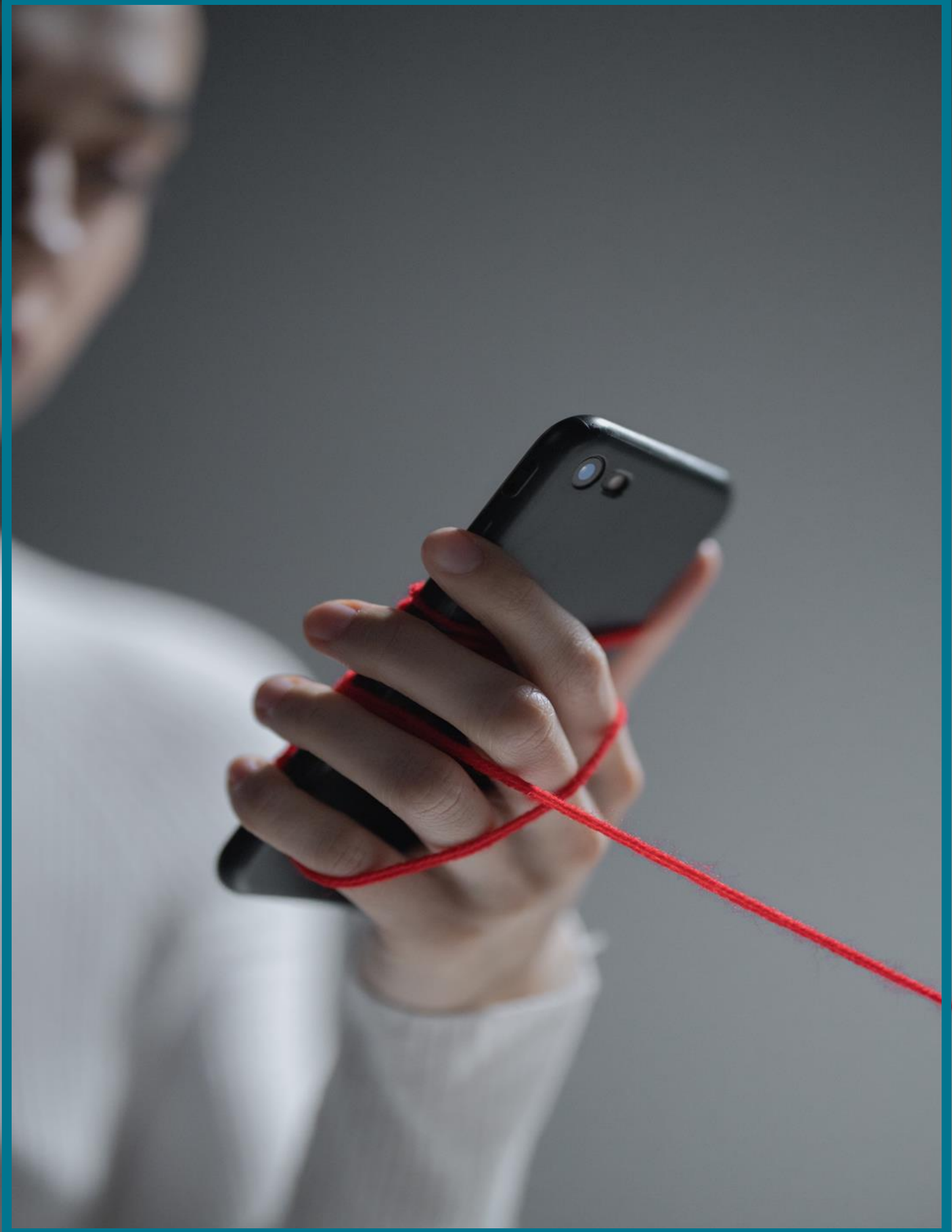
# Table of Contents

<b>ACKNOWLEDGEMENTS</b> .....	<b>4</b>
<b>INTRODUCTION</b> .....	<b>6</b>
PRIVATE, MONOPOLY POWER, A THREAT TO TRUTH TELLING.....	9
RISK – IT’S A GIVEN.....	12
LESSONS, NOT MODELS.....	13
<i>A Basic Standard of Fairness</i> .....	14
<i>Then, the Tide Turned</i> .....	15
DEFINING MISINFORMATION, DISINFORMATION, AND MANIPULATION.....	17
<i>Today’s Technology and Its Novel Challenges</i> .....	18
<b>WARNINGS FROM ANTI-DEMOCRATIC RESPONSES TO DISINFORMATION</b> .....	<b>22</b>
BRAZIL’S CONTROVERSIAL “FAKE NEWS” LAW – A CAUTIONARY TALE.....	22
<i>Brazilians Reflect on the “Fake News” Law</i> .....	24
SINGAPORE: A “PARTLY FREE” DEMOCRACY GRAPPLES WITH DISINFORMATION.....	26
STEPS TOWARD DEMOCRACY.....	28
<b>MEDIA AND DEMOCRACY: HELPFUL LESSONS FROM A RANGE OF NATIONS</b> .....	<b>30</b>
NEW ZEALAND: A STANDOUT IN UPHOLDING PUBLIC STANDARDS, TRANSPARENCY, AND CITIZEN PARTICIPATION IN SOLUTIONS.....	30
<i>Five Key Tools</i> .....	30
<i>Reflections on New Zealand’s Experience</i> .....	35
AUSTRALIA COMBINES LAWS AND VOLUNTARY MEASURES.....	37
<i>Holding Tech Companies to Account</i> .....	37
GERMANY: SETTING HIGHER STANDARDS FOR SOCIAL MEDIA.....	39
<i>Punishing Defamation</i> .....	41
FRANCE FIGHTS INFORMATION MANIPULATION ON SEVERAL FRONTS.....	42
<i>France Combats Online Hate Speech</i> .....	44
<i>Users Fight Disinformation in France</i> .....	44
<i>France Opens New Office to Fight Foreign “Fake News”</i> .....	45
SWEDEN’S “PSYCHOLOGICAL DEFENSE” AGAINST DISINFORMATION.....	45
<i>Sweden: Inventor of the Ombudsman</i> .....	46
<i>Defending Psychological Well-Being</i> .....	46
OTHER NATIONAL RESPONSES TO DISINFORMATION.....	48
<i>The EU Acts to Reduce Risks and Monopoly Power</i> .....	49
<b>LEARNING TO DETECT DISINFORMATION, EVEN AS YOUNGSTERS</b> .....	<b>52</b>
<b>STRENGTHENING TRUST, INSPIRING DEMOCRATIC ACTION</b> .....	<b>56</b>
IGNITING A SENSE OF POSSIBILITY.....	58
<b>APPENDICES</b> .....	<b>62</b>
APPENDIX A: RESOURCES TO COMBAT MISINFORMATION AND DISINFORMATION.....	62
<i>Dos and Don’ts of Refuting Lies and Attacks Union of Concerned Scientists Resource Guide</i> .....	62
APPENDIX B: MOVEMENTS TO COMBAT MISINFORMATION AND DISINFORMATION.....	63
<i>Organizations in the US</i> .....	63
<i>International Organizations</i> .....	63
APPENDIX C: COUNTRY COMPARISON METRICS.....	72
<i>Freedom House Scores</i> .....	72
<i>World Freedom Index</i> .....	77
<b>ENDNOTES</b> .....	<b>78</b>

## Acknowledgements

I am deeply grateful to our Small Planet Institute team for its outstanding work, beginning with Democracy Writing Partner Max Boland and Research and Operations Manager Rachel Madison. My deep thanks also to our institute's Managing Director Cherie Mohr for guiding this complex project. In addition, I am grateful for the stellar work of intern Penny Hill as well excellent assistance in research and editing provided by our entire superb research and editing intern team: Norhan Alshihabi, Edalina Curkic, Kate Gagliardi, Maya Galbreth, Caroline Hoff, Nina Larbi, Lila McNamee, Porscha Mauer-Cordova, Liv Meier Steen, Bianca Pokrzywa, Olivia Smith, and Lexie Wisnieswski. I am indebted to my friend and accomplished editor Susan Kanaan for her excellent input.

Frances Moore Lappé



## Introduction

At an accelerating pace, democracies are in decline worldwide. Today, less than one-fifth of us live in countries deemed “fully free.”<sup>1</sup>

Ours is one of these struggling democracies, and Americans are worried—*really* worried. Almost two-thirds of us believe our democracy is “in crisis and at risk of failing,” a NPR/Ipsos poll found in 2022.<sup>2</sup>

Youth are especially troubled: In a 2021 study only 7 percent agreed that our democracy is healthy, while just over half viewed it as “in trouble” or “failing” (see Figure 1).<sup>3</sup>

“Since the mid 1960s, trust in government has plummeted—from about three-quarters to just one-fifth today.”

Such fear reflects Americans’ sinking trust in government—plummeting from over three-quarters of us in the mid-1960s to just one-fifth today (see Figure 2).<sup>4</sup> And in 2022, disapproval of the Supreme Court’s work hit an all-time high of 58 percent.<sup>5</sup> At the same time, trust in newspapers has hit a record low, with just 16 percent experiencing “a great deal” or “quite a lot” of confidence.<sup>6</sup>

Overall, “less than one in four Americans believe the federal government, American corporations, and national media to be honest,” found research by More in Common in 2021.<sup>7</sup>

While many forces contribute to these bleak assessments, disinformation is certainly one. On January 6<sup>th</sup>, 2021, Americans experienced a piercing wake-up call as to its power when a mob, incited by then President Donald Trump, stormed the U.S. Capitol seeking to overturn the results of a fair election.<sup>8</sup>

Most participants had been made to believe our election had been “stolen by emboldened radical-left Democrats” and “the fake news media.”<sup>9</sup> Leading Republicans had for some time claimed widespread voter fraud, even though data—including that provided by the conservative Heritage Foundation—fail to back these charges. Its online databank covering local to national elections shows insignificant cases in relation to the millions of ballots cast in our nation.<sup>10</sup>

The ensuing chaos, violence, and death on that day were in large measure triggered by disinformation, spread not only across social media but also amplified by major conservative media outlets, including Fox News, Newsmax, and One America News (OAN).<sup>11</sup>

Despite deep divides, nearly all of us *do* “agree that the spread of misinformation is a problem,” according to a 2021 Pearson Institute/AP-NORC poll.<sup>12</sup> Yet, many remain under its influence. Seventy percent of Republicans, for example, still believe that the 2020 election was stolen.<sup>13</sup>

Furthermore, forty-one million Americans, roughly 16 percent of American adults, believe QAnon conspiracies are real—disinformation

## Harvard Youth Poll: Perception of US Democracy



Figure 1. A Harvard poll of youth's perceptions of US democracy found that 52% believed the US has a "failed democracy" or a "democracy in trouble," 27% believed that the US has a "somewhat functioning democracy," 13% either didn't know or refused to answer, and only 7% believed that the US has a "healthy democracy."<sup>3</sup>

that led a Detroit man to murder a family member in the fall of 2022.<sup>14</sup>

And more than a fifth of us believe the Sandy Hook Elementary School massacre was "definitely, or possibly, faked," largely because of the lies of Alex Jones on Infowars, a website with 10 million monthly visits.<sup>15</sup> (Note that Jones' parent company is called "Free Speech Systems."<sup>16</sup>) So painful were Jones' Sandy Hook lies to parents whose children had been killed in the massacre that one family filed and won a lawsuit against him for their suffering.<sup>17</sup>

Many also believe COVID vaccines have been "killing people," reported *Scientific American* in 2022.<sup>18</sup>

Disinformation has also played a role in making many Americans feel that immigration puts their safety at risk, despite a study by the conservative Cato Foundation showing illegal immigrants are convicted of crimes at about half the rate of the native born.<sup>19</sup> Why the unwarranted fear? President Trump's

rhetoric was "prone to linking immigrants and crime," observed a *Christian Science Monitor* reporter in 2020.<sup>20</sup>

Americans widely agree that disinformation is a problem. The problem is, of course, that we're convinced it is the others' facts that are false. Now tearing the fabric of democracy, this divide has grown to such a degree that in 2022, half of Americans predict a civil war in the next "several years."<sup>21</sup>

"In 2022, half of Americans predict a civil war in the next 'several years.'"

Despite troubling findings, three-quarters of Americans still view our country as standing above all other nations or as "one of the greatest," Pew Research Center finds.<sup>22</sup> Surely, such contradictory views of ourselves must create psychic dissonance—discomfort that

## Public Trust in Government

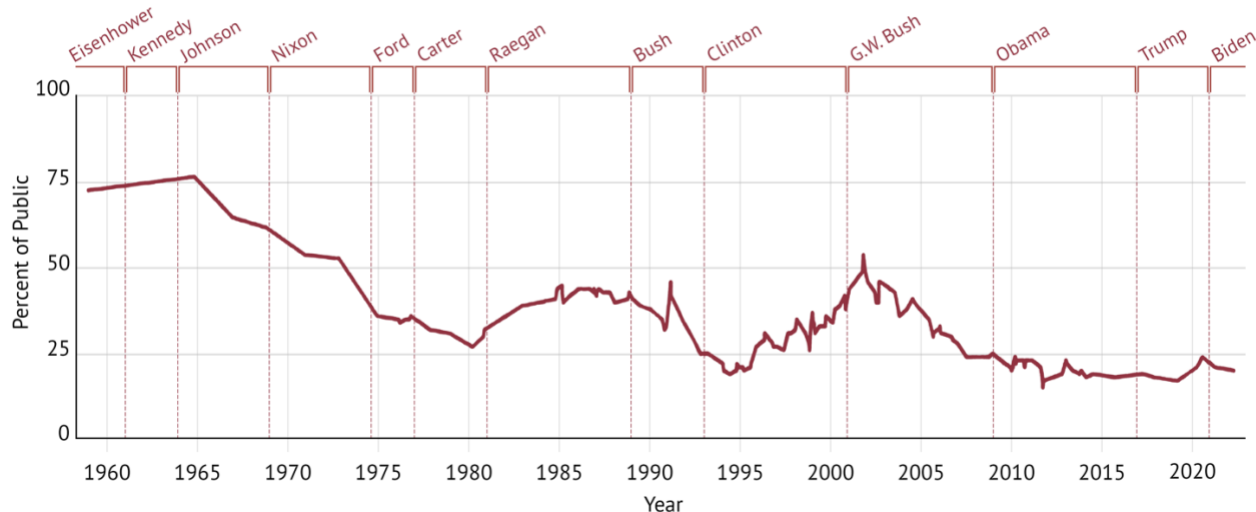


Figure 2. A Pew Research Center poll on the percentage of the public who “trusts” the US Government from 1958-2021, with sections demonstrating the administration in power at each given time. <sup>4</sup>

could feed determination to live up to our positive self-assessment.

It is this possibility that motivates our report.

We hope that discovering the constructive actions of other nations can feed our determination to take on this pressing question: *How can democracies committed to freedom of speech protect against dangerous lies and manipulation?*

The answer is far from obvious.

In the U.S., protections against disinformation in broadcast news are scant. The Federal Communications Commission deems its own rules “narrow in scope,” meaning it will act only to remove what is false and will “immediately cause direct and actual damage to property or to the health or safety of the general public, or diversion of law enforcement or other public health and safety authorities from their duties.”<sup>23</sup> Quite a high bar.

The very topic of countering disinformation is so fraught—and trust in government so low—that in the spring of 2022, when of our Department of Homeland Security formed a “Disinformation Governance Board” to grapple with the challenge, pushback was swift and strident.<sup>24</sup> No doubt one mistake had been putting “governance” in the board’s title—for some evoking Big Brother control of speech.

At first, the Department tried to defend its mission, releasing a “fact sheet” reassuring Americans that the Board’s goal was information and guidance, having nothing to do with censorship.<sup>25</sup> It noted that “for nearly 10 years, agencies across DHS have worked to address disinformation that threatens our homeland security.”<sup>26</sup> The department mentioned, for example, its effort to confront disinformation about public dangers, such as Hurricane Sandy.



But damage control failed, and within a few weeks President Biden nixed the Board.<sup>27</sup>

Americans feel acute sensitivity about “freedom of speech,” but we are almost equally divided on how we prioritize that freedom versus protection from harm. About half of American adults—48 percent—agree, as of 2021, that “government should take steps to restrict false information, even if it means

losing some freedom to access and publish content.” (That’s up from 30 percent in 2018, finds Pew Research).<sup>28</sup>

We are thus walking a tightrope, balancing the protection of our First Amendment rights against the harm of disinformation. Achieving a balance that strengthens our democracy is only made more difficult by monopoly’s grip on U.S. media.

## Private, Monopoly Power, a Threat to Truth Telling

In the 1980s, around 50 media corporations competed for our attention, but today just six corporations own 90 percent of U.S. media.<sup>29</sup> And media concentration continues to tighten.

“Hate-filled Tweets’ leapt nearly five-fold, potentially reaching over 3 million users, in the 12 hours following the purchase.”

At this writing, Elon Musk, the world’s richest person, has just purchased Twitter for \$44 billion.<sup>30</sup> Repeatedly, Musk has stressed his commitment to “free speech” and left unclear how he will handle disinformation – i.e., harmful lies.<sup>31</sup> Consequences were immediate. “Hate-filled Tweets” leapt nearly five-fold, potentially reaching over 3 million users, in the 12 hours following the purchase.<sup>32</sup>

Also in this moment, “deepfake” media manipulation on TikTok is “raising alarms,” reports *The New York Times*.<sup>33</sup> With 1.6 billion active users, the spread of false and altered content, which can be used to “sow political

division, advance conspiracy theories and threaten the core tenets of democracy” is worrisome.<sup>34</sup>

Such concentration of power gives these six leading corporations enormous power to operate as they please, even undermining democracy when such private profit-motivated entities reign over citizens’ will.<sup>35</sup> In 2021, as both political parties were considering legislation to reign in corporate power, seven big tech companies spent nearly \$70 million on lobbying to counter government action to increase competition in the media sphere.<sup>36</sup> That year, Facebook’s parent company, Meta, spent over \$20 million on lobbying, ranking seventh in overall spending.<sup>37</sup> Comcast spent nearly \$13.5 million.<sup>38</sup>

Beneath the threat of monopoly power is the underlying danger of public communication driven by what advertisers will pay for. “The reliance on advertising by so much of our digital public sphere—Facebook, YouTube, TikTok, Instagram, and Twitter—has perniciously fueled tribalization, hate speech and surveillance,” argues sociologist and *New York Times* columnist Zeynep Tufekci.<sup>39</sup>

While the threat to fact-based, democratic exchange posed by the narrowing control of private, advertising-driven media is real, one key corporate media player stepped up. In 2016, Facebook announced it would enable its 1.8 billion users to report "hoaxes and mark news as fake," reported CNBC. Its plan also relies on help from fact-checking organizations, including Poynter Institute's International Fact-Checking Network, to identify and call out fake stories.<sup>40</sup>

In mid-2022, Meta expanded its scope, launching a tool—"Sphere"—aimed at increasing the validity of the Wikipedia database through algorithm-based fact-checking. Meta claims to be the first AI-powered, internet tool "automatically scanning hundreds of thousands of citations at once to check whether they truly support the corresponding claims."<sup>41</sup>

"The reliance on advertising by so much of our digital public sphere – Facebook, YouTube, Instagram, and Twitter – has perniciously fueled tribalization, hate speech, and surveillance,' argues sociologist and *New York Times* columnist Zeynep Tufekci."

Note, however, Sphere is still in its research phase and has not been put into use.<sup>42</sup> Meta does have another fact checking service called Crowd Tangle on platforms such as Facebook. However, the future of this service is unclear. In 2021, the CEO of Crowd Tangle, Brandon Silverman, and other members of his team at

"Guiding our brutal form of capitalism is one unspoken "rule": *Do what brings the highest return to existing wealth*"

Meta left the company. After his departure he claimed that there are varying schools of thought on transparency within Meta; "While some at the company tended to advocate for as much transparency as legally feasible, others believed that transparency has led to needless complication."<sup>43</sup>

This, along with the fact that right-wing pages consistently get more attention than traditional news outlets, calls for great concern about the misinformation that is, and will be, spread on Meta platforms.<sup>44</sup>

Of course, monopoly control doesn't exist only within U.S. media.

It is an outcome flowing from the unspoken "rule" guiding our brutal form of capitalism: *Do what brings the highest return to existing wealth*. What follows is extreme economic inequality and tightly held corporate power.

Way back in 1890, the Sherman Anti-Trust Act—the first rule to combat such power—passed unanimously. It aimed to break up consolidated "trusts" (i.e., monopolies). Yet, despite a few critical cases throughout the 1900s, the bill's vague wording limited its impact.<sup>45</sup> Meanwhile, monopolies' power tightened.

In the early 20<sup>th</sup> century, the inventor of the (aptly named) board game Monopoly, Lizzie Magie, hoped to alert us once again to the

danger of monopoly power. In her game, each player moves around the board until one has control of virtually all the property.<sup>46</sup> While Monopoly has become an iconic family pastime, the winning strategy illustrates the dynamic driving our very real American economy: In it, income, wealth, and power concentrate to the point that, today, the three richest Americans control more wealth than the bottom half of the population.<sup>47</sup>

When I was a kid, the dynamic of the game was not so bad. My brother won most of the time, but at least that meant I could go to bed. Operating within a society, though, its logic results in fewer and fewer of us having a bed to go to.

Clearly, we didn't heed Magie's warning. Today her game is owned by Hasbro—yes, a monopoly.<sup>48</sup>

In the process, we've generated wealth inequality more extreme than in 111 countries, putting us virtually on par with the Ivory Coast and Peru. By contrast, most nations we consider peers enjoy much more equal distribution of wealth.<sup>49</sup>

And income inequality? We rank 122<sup>nd</sup>, just below Haiti and Malaysia—putting us nearly fifty nations below the nearest Western democracy, based on World Bank data.<sup>50</sup> We arrived at this sad place in part because so many of us think of “rules” as oppressive. What is critical to keep in mind, however, is that all markets have rules. Many are explicit, life-protecting rules that most of us appreciate—including those against, say, the sale of medications not approved by the FDA; or workplace rules to protect workers from danger.

The political and economic aspects of democracy are inseparable, as many citizens now grasp. We began with alarming news of the tight grip of a few media corporations, but monopoly power is a hazard across most sectors today.<sup>51</sup>

Monopoly power is one reason that over the last half century, the American economy has become much more unfair. One measure? Our middle class has shrunk by almost 20 percent.<sup>52</sup> Economic insecurity can, unfortunately, also make us more vulnerable to disinformation, including “blaming the other” narratives that can distract us from the systemic failures of our brutal form of capitalism.

Such vulnerability to disinformation has many sources; but, in our culture, one seems particularly active and longstanding. Its roots are in the premise that our economy embodies a “free market” in which anyone who tries hard enough can rise to success. Thus, it is understandable that many of those at the lower rungs of the economic ladder assume, even if unconsciously, that they are responsible for their own poor standing.



Feelings of shame can then arise. But shame is extremely uncomfortable, and relief is often found in blame. Thus, disinformation that identifies enemies and encourages blaming has

great appeal. Trump’s identification of illegal immigrants as a major cause of our ills, for example, resonates with many, and

Republicans now gain support in renewed calls for a border wall.<sup>53</sup>

Thus, America’s deepening political divides, fed by disinformation, also have roots in the deepening economic insecurity that so many experience today. As noted, income inequality in the U.S. is already more extreme than in 121 countries.<sup>54</sup>

As we explore later, answers lie in building a strong democracy movement that enables elected officials to answer to citizens, not Big Money. We will then have a chance to reinstate effective anti-monopoly rules and create a fairer economy.

All of the above matters because trust is a bedrock of democracy. Citizens are motivated to engage only when we trust each other and our elected bodies. If distrust and despair drive citizens to withdraw, democracy dies.

At the same time, one can well argue that democracy has never been more necessary. Without it, how can humanity possibly confront today’s extreme and deadly concentration of wealth or existential planetary threats, from the climate crisis to species extinction?

“If distrust and despair drive citizens to withdraw, democracy dies.”

Disinformation is also, of course, a common tool of autocrats, as today we see Russia’s Vladimir Putin using it to justify his merciless attack on Ukraine.<sup>55</sup> Corrupted democracies are known to employ disinformation. So, we begin with cautionary tales of their actions.

However, the purpose of our report is positive learning. Thus, our focus is on the varied experiences of five democracies that are creatively, courageously, and constructively taking on the disinformation crisis.

## Risk – It’s a Given

As we begin, let us underscore perhaps an obvious realization coming out of our research: *Risk is unavoidable.*

Failing to confront disinformation involves great risk, and today we are experiencing the negative consequences of our neglect. But tackling disinformation also involves risks, including mistakes in identifying disinformation as well as overreach diminishing freedom of speech, not only in the U.S., but across the world.

But the inevitability of risk doesn’t leave us powerless. Our premise is that we can minimize risk as we move ahead with care and draw on the experience of others we respect.

Being able to learn from other nations, however, requires a realistic assessment of ourselves. And this is tricky, especially because the mindset of “American exceptionalism”—meaning everything American is exceptionally good, certainly as it relates to “freedom”—has been around for so long. But humility is in

order. Today our democracy ranks poorly. Freedom House—founded in 1941 by Eleanor Roosevelt and other prominent Americans—places the U.S. between Samoa and Panama (see Figure 3).<sup>56</sup>

Freedom House annual rankings, on which we rely throughout this report, are based on an analysis of a nation’s political rights and civil liberties (see Appendix C-1).

Political rights are measured in fairness of the electoral process, choice and participation in the political system, and how well government functions. Civil liberties cover freedom of expression and belief, freedom of association, and the rule of law.

Challenging Americans’ self-image, we fall behind 61 countries including all 27 E.U. nations except Bulgaria and Poland.<sup>57</sup>

Why our low ranking? One factor could be the role of money in American politics. Here in the U.S., spending in our 2020 presidential and congressional elections totaled \$14.4 billion—more than double the record set in 2016, according to Open Secrets.<sup>58</sup>

This leap follows the Supreme Court’s 2010 *Citizens United V. Federal Election* ruling



Figure 3. Freedom House ranks the United States 62<sup>nd</sup> with a freedom score of 83, placing it between Samoa and Panama.<sup>56</sup>

enabling corporations and other donors to spend “unlimited funds” in U.S. elections.<sup>59</sup>

By contrast, all E.U. member states except Italy provide public subsidies for party funding.<sup>60</sup> Typically, public financing provides over half of party income.<sup>61</sup>

Consider Germany. In its 2018 election, the largest share of political party financing came from public funds and party-membership fees. Only 10 percent came from private donations. Per capita, Germans spent only one-seventh as much in their national election as the U.S. did in our 2020 election.<sup>62</sup>

Another E.U. nation—France—places limits on individual contributions to both party and presidential candidates. Corporate firms and legal entities are banned from financing candidates altogether.<sup>63</sup>

## Lessons, Not Models

Our aim here is not to champion specific, corrective measures to fight disinformation, but rather to offer examples of what some democracies are doing to combat it. As we humans take our cues from each other, our hope is that learning about how others are combating disinformation could trigger effective action here at home.

Neither is our report an exhaustive exploration—it is a beginning. We hope to update it as constructive strategies and progress emerge, and we invite you, dear readers, to send your suggestions and updates to: [CrisisofTrust@smallplanet.org](mailto:CrisisofTrust@smallplanet.org).



Figure 4. MIT Media Lab Observed that “Falsehoods are 70% more likely to be retweeted than truth and reach their first 1,500 recipients six times faster.”<sup>64</sup>

Disinformation is a mighty force. It can tap humanity’s tendency to blame and latch onto simple answers. Plus, the speed of its transmission gives disinformation special power. As MIT Media Lab observed, “Falsehoods are 70 percent more likely to be retweeted than truth and reach their first 1,500 recipients six times faster” (see Figure 4).<sup>64</sup>

Why does false information spread so rapidly? Perhaps it’s that humans tend to be attracted to what’s novel and emotionally charged, making us vulnerable to inflammatory and polarizing media.<sup>65</sup>

So, what’s a democracy to do when lies fly while truth crawls?

We can start by acknowledging that our Constitution’s First Amendment aimed not simply to protect the individual’s right to speak. It was also fashioned to serve a vital *public* function: “to assure unfettered interchange of ideas for the bringing about of political and

social changes desired by the people,” as clarified in a 1957 Supreme Court ruling.<sup>66</sup>

We fail, however, in this core public purpose if “freedom of speech” gets reduced to the right to say whatever we please within a “marketplace of ideas”—a metaphor introduced more than a century ago by Justice Oliver Wendell Holmes, Jr.<sup>67</sup>

At great peril we become blind to the fact that all markets have rules, explicit or not. Thus, in parallel fashion, why wouldn’t citizens also see that democracy itself—our most cherished national value—requires protective rules against dangerous lies?

In the past, we have stepped up to the task, even if imperfectly.

### *A Basic Standard of Fairness*

In 1949, a national commission promulgated a report, *In the Matter of Editorializing by Broadcast Licensees*. It interpreted the public-interest provisions of the newly passed Radio Act and the Communications Act as a mandate to promote “a basic standard of fairness” in broadcasting. Licensees were required to devote airtime to fair and balanced coverage of controversial issues that were of interest to their home communities.<sup>68</sup>

“In 1949, the Federal Communications Commission introduced the fairness doctrine requiring radio and TV broadcasters to present issues of public importance from a range of viewpoints.”

That year, the Federal Communications Commission (FCC) introduced the fairness doctrine, requiring radio and TV broadcasters to present issues of public importance from a range of viewpoints.<sup>69</sup> In 1959, a portion of the fairness doctrine became law when Congress amended the Communications Act to mandate equal airtime for office seekers.<sup>70</sup>

“The revised law recognized some exceptions to the equal airtime mandate but held that such exceptions did not annul licensees’ obligation to provide equal airtime and balanced coverage of ‘conflicting views on issues of public importance,’” reports *Encyclopedia Britannica*.<sup>71</sup> Presumably, the FCC believed that ensuring listeners’ exposure to differing views encouraged more nuanced thinking and makes it more likely that listeners can detect lies.

A decade later, in 1969, the Supreme Court defended the law in a unanimous decision.<sup>72</sup>

### *Then, the Tide Turned*

In 1987, however, President Ronald Reagan stopped enforcing the fairness doctrine, leaving intact only the “editorial and personal-attack provisions,” which remained in place until 2000.<sup>73</sup> The doctrine’s official end came in 2011 when—in response to Republican pressure—the Obama administration “killed it” along with more than 80 specific rules governing electronic media that had been deemed “obsolete.”<sup>74</sup>

Instead of ushering in a wider range of speech and interchange, the opposite happened: One-sided, fact-free, emotionally charged—and highly profitable—talk radio exploded. Spewing blame, hate, and racism, Rush Limbaugh’s

shock radio quickly made him a multi-millionaire; and his host—Sinclair Broadcasting Group—soared to reach about 40 percent of America’s households. Since 2009, its profits have leapt nearly ten-fold.<sup>75</sup> In 2021, after Limbaugh’s death, one of the two men Sinclair chose to replace him had worked for Fox News Radio.<sup>76</sup>



Cable news also took off during the 1980s, offering people more broadcasts with a wider range of perspectives. In theory, access to more diverse internet content should foster exposure to a wider variety of media, helping to widen our perspectives.

But, in the decades following the end of the fairness doctrine, audiences tended to sort themselves—consuming media offering a narrower range of opinion. By 2020, among those leaning Republican, 98 percent cited Fox News as their political news source, while among those leaning Democratic, 87 to 95 percent cited NPR, *The New York Times*, and MSNBC.<sup>77</sup>

The method of news delivery also changed. By 2021, 86 percent of Americans reported getting their news from digital devices. Social media has become the main source for almost a quarter of us, and half reported its use “at least sometimes.”<sup>78</sup> Not surprisingly, Americans

typically choose social media sources aligned with their political orientation.<sup>79</sup> So, the rapid shift to digital content also created virtual “echo chambers,” allowing misinformation and disinformation to spread quickly with little pushback from users.

“By 2020, among those leaning Red, 93 percent cited Fox news as their political news source, and among those leaning Blue, 87 to 95 percent cited NPR, *New York Times*, and MSNBC.”

Thus, the Court’s premise of an “unfettered interchange of ideas” no longer holds, as most of us do not regularly hear opposing views from which truth can “ultimately prevail.”<sup>80</sup>

Despite these alarming developments driving us apart, we often have more in common than we think. Although Democrats and Republicans disagree on how government should regulate online platforms, some in both parties agree that power to control these crucial forums cannot be left to private business interests alone.<sup>81</sup>

Recently, Republican leadership in Texas passed legislation that would allow citizens to sue online platforms that remove posts “because they express a certain viewpoint,” sparked by concerns that conservative speech has been censored online.<sup>82</sup>

On the Democratic side, in the spring of 2022, former President Barack Obama called on tech companies to provide greater transparency about how they promote content, and for tighter regulation to combat the

“disinformation problem.”<sup>83</sup> He urged all of us to combat the profit-driven motives of companies and to “break through our information bubbles.”<sup>84</sup>

Some studying our media landscape identify perhaps the even deeper challenge: Harvard Professor Lawrence Lessig notes that, until recently, the “free speech we liberals romanticize has always had humans standing behind it.”<sup>85</sup> But in today’s narrowly profit-driven media, “free speech is driven...by machines that craft speech based upon the behavior that is desired. Most commonly, that behavior is simply commercial—clicking an ad.”<sup>86</sup>

The profit motive reigns.

To this point, a 2019 sample of over 20,000 websites posing disinformation risks collectively brought in annual profits of \$235 million, reports the Global Disinformation Index, a social-benefit organization providing transparent data to “combat disinformation and its creators.”<sup>87</sup>

“But...today’s ‘free speech is driven...by machines that craft speech based upon the behavior that is desired. Most commonly, that behavior is simply commercial – clicking an ad.’ Professor Lawrence Lessig

So, how *do* we ensure freedom of expression while at the same time staying true to a foundational purpose of our nation laid out in our Constitution’s preamble: to “promote the



general Welfare”?

For one, we can heed warnings from nations succumbing to disinformation. For another, we can seek lessons from countries creatively confronting the crisis—especially those ranking higher than the U.S. in political and civil liberties. And, sadly for us, many nations qualify.

“Freedom House warns that only one fifth of the world’s population now live in countries it deems ‘free.’”

As noted, Freedom House places us 62<sup>nd</sup> in its Global Freedom Index, between Samoa and

Panama.<sup>88</sup> The Sweden-based Varieties of Democracy organization ranks the U.S. 29<sup>th</sup> and includes us among 33 countries that have “undergone substantial autocratization.”<sup>89</sup> As we stated in the opening of this report, Freedom House warns that only one-fifth of the world’s population now live in countries it deems “free.”<sup>90</sup> For a comprehensive list of Freedom House country rankings, see Appendix C-1.

May this alarming news, along with inspiration from creative responses we share in this report, ignite action to protect robust, truthful communication and combat our crisis of trust.

Truth be told, our democracy itself is at stake.

## Defining Misinformation, Disinformation, and Manipulation

First, let’s get clear on key terms. “Misinformation” and “disinformation” have come into wide use in recent years, as both left-leaning and right-leaning political figures accused the other of spreading fabrications and lies. While often used interchangeably, these terms carry significantly different meanings. Merriam-Webster defines misinformation as “incorrect or misleading information,” while disinformation is “false information deliberately and often covertly spread (as by planting rumors) to influence public opinion or obscure the truth.”<sup>91</sup>

A particularly consequential example of disinformation is Russia’s interference in the 2016 U.S. presidential election.<sup>92</sup> Russia’s campaign micro-targeted deceptive messages to Americans via Facebook ads tailored to

appeal to specific demographics and locations with the goal of undermining Hillary Clinton and boosting Donald Trump’s campaign. The ads included fabricated articles and other lies.<sup>93</sup>

While disinformation is always spread with the intent to deceive, misinformation can be created accidentally and spread without knowledge that it is false. However, it can quickly morph into disinformation if intentionally spread and weaponized to mislead and deceive.

Examples of efforts to find solutions to misinformation and disinformation explored below often do not distinguish between the two. One reason is simply that the intent of a publisher or individual spreader is often

difficult to discern. Yet for democracy, both can be equally damaging.

More difficult to define and confront is what we are calling “manipulation”: the intentional effort to influence by, for example, telling only one side of a story and carefully tailoring messages based on the target’s vulnerabilities. By manipulation we also mean using language and imagery to trigger strong emotions, often to intentionally divide listeners by race, class, or culture. In addition, we include references to hate speech—that which is discriminatory and intended to humiliate. An example of hate speech action is New Zealand’s commitment to removing speech degrading its indigenous people, the Māori.

### *Today’s Technology and Its Novel Challenges*

While misinformation, disinformation, and manipulation are hardly new, their prevalence has grown as technology has advanced. This is largely due to the increasing ability to manipulate information along with the speed of information flow and accessibility. Video, audio, and photo editing, for example, can now all be used to twist a person’s story.

Adding to the danger is the increasing concentration of media ownership, as we’ve stressed.<sup>94</sup> The tighter the control, the tougher it is to hold owners accountable, as a small number of powerful players have more resources to lobby for less oversight in the public interest.<sup>95</sup>

While, as noted, digitization has triggered a proliferation of news sources that potentially allow us to access a wider range of views, a very human trait can block that path: Subconsciously, we tend to trust those whose

beliefs and values mirror our own—a psychological pattern called “confirmation bias.”<sup>96</sup> Fortunately, though, it does not completely disable our capacity to distinguish fact from fabrication.

“A particularly consequential example of disinformation is Russia’s interference in the 2016 U.S. election.”

Another danger of new technologies is that some make it easier to micro-target information, true or untrue, to specific people. So, below we offer guidance from experts on how to become savvy media users.

One infamous perpetrator is the now-defunct consulting firm Cambridge Analytica, which was a deceptive force influencing the 2016 U.S. presidential election. To target messaging, it collected millions of data points on Facebook users to create psychological profiles. The Trump and other Republican campaigns subsequently used its data to target messages to voters likely to be swayed.<sup>97</sup>

The consulting firm’s work was also implicated in the U.K.’s 2016 pro-Brexit vote. Its messages included only positive aspects of leaving the E.U. and made strong emotional appeals.<sup>98</sup> Its ubiquitous slogan “take back control” was likely chosen to appeal to citizens’ honor, while hiding Brexit’s potential economic and political downsides.<sup>99</sup>



For more insight into the role of Cambridge Analytica and its hidden influence in the U.K in 2016, watch “*The Great Hack*.”<sup>100</sup> See also, *Cyberwar: How Russian Hackers and Trolls Helped Elect a President* by University of Pennsylvania professor Kathleen Hall Jamieson.<sup>101</sup>

Earlier, in 2014, the Super PAC created by John Bolton, former U.S. National Security Advisor to President Trump, used Cambridge Analytica’s data to target voters in numerous races with personalized ads based on their psychological profiles.<sup>102</sup>

Of course, even companies legally collecting our data, including Facebook and Google, acquire ever-more information about what triggers a response from us. Thus, with our data

available for both inadvertent misuse and intentional use by nefarious actors, it’s of paramount importance that citizens evaluate information and seek out a wide range of sources.

One helpful strategy we each can use comes from Michael Caulfield, a digital literacy expert at Washington State University. He calls it **SIFT**: **S**top, **I**nterrogate the source, **F**ind better coverage, and **T**race claims, quotes, and media back to their original context.<sup>103</sup>

Personal defensive actions can, however, take us only so far.

So, in this report, we focus on public tools to identify and limit dissemination of lies and harmful manipulation. Democracy will always require a continuous and delicate balancing of two values: our individual liberties and a key purpose of our nation—to “promote the general Welfare”—as stated in our Constitution’s preamble, noted earlier.

Of course, when we do it right, these goals are complementary, as the late Senator Paul Wellstone reminded us: “We all do better when we all do better.”<sup>104</sup>

A Helpful Strategy: **SIFT**

**S**top

**I**nterrogate the source

**F**ind better coverage, and

**T**race claims, quotes, and media back to their original context

Yes, the task is daunting. But once we embrace democracy as essential to solving *any* of the staggering challenges now facing humanity, we have no choice. We must step up for democracy and do so boldly.

To motivate careful action, our report focuses on countries offering positive lessons. We begin, however, with warnings embodied in the flawed strategies of two countries: Brazil and Singapore.



## Warnings from Anti-Democratic Responses to Disinformation

### Brazil's Controversial "Fake News" Law – A Cautionary Tale

In mid-2020, Brazil's Upper House approved the Internet Freedom, Responsibility, and Transparency Bill—commonly known as the "fake news" law—to combat the spread of disinformation on social media platforms such as Facebook, Twitter, WhatsApp, and Telegram. The law would make telecom providers such as Twitter responsible for stopping disinformation and increasing transparency of sponsored content. It would also sanction companies for noncompliance.<sup>105</sup>

Later that year, Freedom House released a statement opposing the bill, supported by 52 civil-society organizations worldwide, including Amnesty International Brazil and Human Rights Watch Global. Opponents view the law as "a fast-tracked draft bill [that] brings concerns about undermining online speech and privacy."<sup>106</sup> Their primary concerns center around user-communication, data retention, and a provision that "forces internet applicants to *unequivocally* individualize the *user* of an IP address."<sup>107</sup>

"Freedom House ranks Brazil between Guyana and Botswana, just barely inside its 'free' country category."

Such provisions, they fear, could make us all easy targets.

The Freedom House statement further argues that the definition of disinformation laid out in the bill is vague, which could allow legitimate information to be dismissed as false or offensive simply because it does not align with the views of those in power.<sup>108</sup>

"Opponents of Brazil's law ostensibly designed to fight disinformation worry that it could end up increasing the risk of data breaches, identity theft, and fraud."

The law would also prohibit "inauthentic and automated accounts," such as those run by bots.<sup>109</sup> A plausible concern here is that both private citizens and political actors could take advantage of this rule to report and shut down semi-automated social media accounts that promote ideas of activists, social movements, and other groups they oppose.

Critics worry the law would also compel social networks and private messaging apps to require users to share identification-and-location information that could be accessed by, for example, the Chief of the Civil Police. Prosecutors could then—without a warrant—access users' subscriber data, including names and addresses.<sup>110</sup>



Figure 5. In 2020, attacks on journalists and the media in Brazil significantly increased. The National Federation of Journalists recorded 428 cases of violence against journalists, which included 2 murders, that year. Bolsonaro’s administration was responsible for at least 580 of these attacks.<sup>117, 118, 119</sup>

Furthermore, the measure could increase the risk of data breaches, identity theft, and fraud. As valuable personal data are being collected and stored, criminals and hackers have financial incentives to access that information for nefarious purposes.

The bill’s penalties for noncompliance include the “temporary suspension of the [social media apps’] activities.”<sup>111</sup> This feature of the bill could block millions of communications on platforms upon which Brazilians rely. Some worry that social media companies—fearing suspension of their apps—would restrict accounts “where there is even an iota of doubt.”<sup>112</sup>

Just a month after its introduction in June of 2020, Brazil’s Internet Freedom, Responsibility, and Transparency bill was modified. Some changes limited the collection of personal data from individuals and removed criminal penalties for sharing fake news. However, the

bill still grants platforms powers typically reserved for law enforcement such as “the power to solicit government identification from users.”<sup>113</sup>

As of fall, 2022, the bill is still pending.

Brazil’s standing on digital rights has been undermined by President Jair Bolsonaro—a former military officer elected in 2018. He has launched criminal investigations of his online critics and passed laws limiting freedom of expression and making it harder to remove disinformation content.<sup>114</sup> He has also been criticized for monitoring social media voices he might want to silence—activists, journalists, and political opponents.<sup>115</sup>

Brazil’s online integrity has been further harmed by Bolsonaro’s and allies’ disinformation campaigns.<sup>116</sup>

Violence against the press is also limiting free expression. In 2020, attacks on journalists and the media in Brazil significantly increased.<sup>117</sup> That year, the National Federation of Journalists recorded 428 cases of violence against journalists, including two murders.<sup>118</sup> Bolsonaro’s administration was responsible for at least 580 online and verbal attacks against the media, according to Reporters Without Borders (see Figure 5).<sup>119</sup>

“Less than a month after its introduction, Bolsonaro’s ban on removing social media posts was struck down by Brazil’s Senate and top court.”

Despite Bolsonaro’s intimidation tactics, awareness of the problem and resistance to his

administration's approach to disinformation is growing. For example, many raised concerns in September 2021 when the Brazilian government blocked social media companies from removing certain content, including disinformation, without a court order. Some see this action as "the first time a national government has stopped internet companies from taking down content that violates their rules," observed Jack Nicas in *The New York Times*.<sup>120</sup>

"In Brazil in 2020, the National Federation of Journalists recorded 428 cases of violence against journalists, including two murders."

Under this policy, social media platforms can remove posts only if they involve specific topics such as "nudity, drugs, and violence, or if they encourage crime or violate copyrights." A court order is required to take down posts that fall outside these categories.<sup>121</sup>

However, the policy on removing content was short-lived: Less than a month after it was introduced, Bolsonaro's ban on removing social media posts was struck down by Brazil's Senate and top court. The Supreme Court explained that the specific limits on what could be taken down could allow an even more dangerous and toxic online environment.<sup>122</sup>

Mauricio Santoro, a professor of International Relations at the State University of Rio de Janeiro, says "It's a very positive sign that the Brazilian political class reacted... Brazilian leadership is finally understanding how important the internet is to political life in Brazil."<sup>123</sup>

President Bolsonaro has pledged to fight tech companies' censorship of the people. However, his attempts to prevent the regulation of his own posts on social media suggests that his main concern may be ensuring that his narrative of Brazil's politics will not be challenged.

In June 2022, with various polls showing former President Luiz Inácio Lula da Silva leading Bolsonaro ahead of the October 2022 election, Bolsonaro continued to use disinformation as a political weapon. Most recently, he has used social media to attack Brazil's electronic voting system and spew baseless claims of election fraud, likely causing some citizens to doubt the election results.<sup>124</sup>

No doubt these unpopular steps under his presidency are among the reasons he narrowly lost to President-elect Luiz Inácio Lula da Silva in Brazil's run-off election.<sup>125</sup>

Freedom House recently lowered Brazil's Global Freedom Score from 78 down to 73, placing it between Guyana and Botswana (see Figure 7). It is still inside—but barely—the "free" category.<sup>126</sup> And, as we consider Brazil's struggles, note the sobering truth that Freedom House ranks the U.S. only 10 points higher than Brazil.<sup>127</sup>

### *Brazilians Reflect on the "Fake News" Law*

We decided to ask Brazilian friends for their thoughts on the "fake news law," their awareness of fake news, and how it has impacted their lives. Per their requests, they shall remain anonymous. Here are some of the responses:



**Question:** How much do you know about the Internet Freedom, Responsibility, and Transparency Bill, otherwise known as the “fake news law”? How has fake news affected the people around you?

**Response:** I think [false information] is one of the most important subjects we must address, after what we saw happened with the previous U.S. elections. In Brazil, the Facebook and WhatsApp platforms were decisive in influencing the nation using fake news and bots. I personally had many arguments with my family. Now, regarding the Fake News Law, I think it is a must in all democratic nations. Unfortunately, citizens are easily manipulated by social media information and do not have the critical view (because of capacity, education, or habit) to doubt before assimilating it as true.

Once I spent more than four hours researching all the information they allegedly said was true. Even after refuting all their “pieces of evidence,” my family members still did not believe in me, nor the mainstream media.

**Question:** Service providers under Brazilian law are required to save a year’s worth of communications (texts, emails, etc.). Anyone with a warrant (even in a civil suit) can access these communications. This raises concerns about violations of privacy on behalf of citizens, journalists, and activists. Are you confident in the courts’ ability to issue warrants only when needed? Do you think that these warrants may be abused and used for political purposes?

**Response:** I was not aware that anyone with a warrant could access private communications. And I believe that such information should only be accessed by authorized personnel, independent of political influence...because some courts can suffer from the influence of powerful individuals and private interests.

**Question:** The law also compels social networks and private messaging apps to require users to share their identification information and location. This information could be accessed by the Chief of the Civil Police and allow prosecutors to access users’ subscriber data, including their names and addresses, without a warrant. The bill was modified in June 2020 to limit the collection of some personal data, but it still requires media companies to collect the identities of users. Do you worry that this law may be causing the government to collect too much information on people? Do you think the government generally uses this information responsibly?

**Response:** We have to be concerned about the use of data and disinformation from both [the government and private companies]. Yes, governments can use this information irresponsibly and therefore must be surveilled. But without accountability and anonymity, much misinformation and even incitation to extremism (as we saw in the Capitol Riot here in the U.S.) can be spread without consequences.

**Question:** In general, do you trust the Brazilian government? Do you think it is using this law for political means or are they honestly trying to slow the spread of fake news?

**Response:** Governments are made of people, and the moral values of these individuals reflect and represent, collectively, a trustful or untrustful government. As most voters do not spend much time investigating the life and moral curriculum of their candidates, it is hard for voters to evaluate honesty and ethics. Brazilian politicians have a notorious history of corruption, so that trust seems unrealistic.

So, some politicians are probably using this law for political means. Nevertheless, some are also probably honestly trying to tackle the spread of fake news, which, I reiterate, technically is a must, because fake news can jeopardize the entire democratic state.

Figure 6. Conversation with Brazilian friends regarding Brazil’s new “Fake News” law.

We thank our Brazilian friends for sharing their insights about this critical issue.

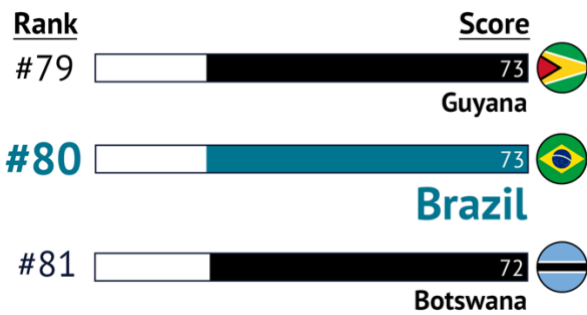


Figure 7. Freedom House Ranks Brazil 80<sup>th</sup> with a score of 73, placing it between Guyana and Botswana.<sup>126</sup>

Brazil’s rocky political history has both worsened the problem and narrowed its path toward solutions. Persistent corruption over the years has led citizens to lose trust in the

media and the government, pushing them to alternative news sources and making them skeptical of any government solutions to address the disinformation problem.

In sum, concerns over Brazil’s “fake news law” include its lack of transparency, public participation, and privacy, as well as its potential use for nefarious political purposes. The bill is a stark reminder that, as we strive to eliminate misinformation and disinformation, we must fully protect individual liberties, privacy, and safety. Let it serve as a warning to us all that authoritarian governments’ misguided attempts to stop the flow of misinformation and disinformation can lead to a violation of rights and the steep decline in public trust.

## Singapore: A “Partly Free” Democracy Grapples with Disinformation

Singapore—deemed “partly free” by Freedom House—recently passed a law that has been criticized for limiting free speech and political dissent.<sup>128</sup> In 2019, Parliament passed the Protection from Online Falsehoods and Manipulation Act (POFMA) designed to protect citizens from false information, especially leading up to Singapore’s general election in 2020.<sup>129</sup>

The Act empowers government agencies to assess whether internet posts are false and damaging to Singapore’s security, domestic and international interests, confidence in government, elections, or its citizens.<sup>130</sup>

Punishment for violations varies according to whether misinformation or disinformation is being spread. For misinformation, the law empowers ministers to order persons spreading

“The effect of Singapore’s law on political speech caused the World Press Freedom Index to lower the country’s 2021 ranking – placing it well below Russia and Myanmar, both authoritarian regimes.”

the false information to post corrections and then to prevent them from posting similar statements.<sup>131</sup> Punishment for disinformation is more severe. Citizens who knowingly spread false information deemed damaging to any of the state’s broad interests listed above can be liable for a fine of up to \$50,000 Singaporean

dollars (approximately \$36,000 USD) and imprisonment for up to five years.<sup>132</sup>

During the appeals process, courts are the final arbiter of truth. Once a government minister identifies a post as false, the order—typically a correction—must be followed unless the judgment is reversed by the court.<sup>133</sup>

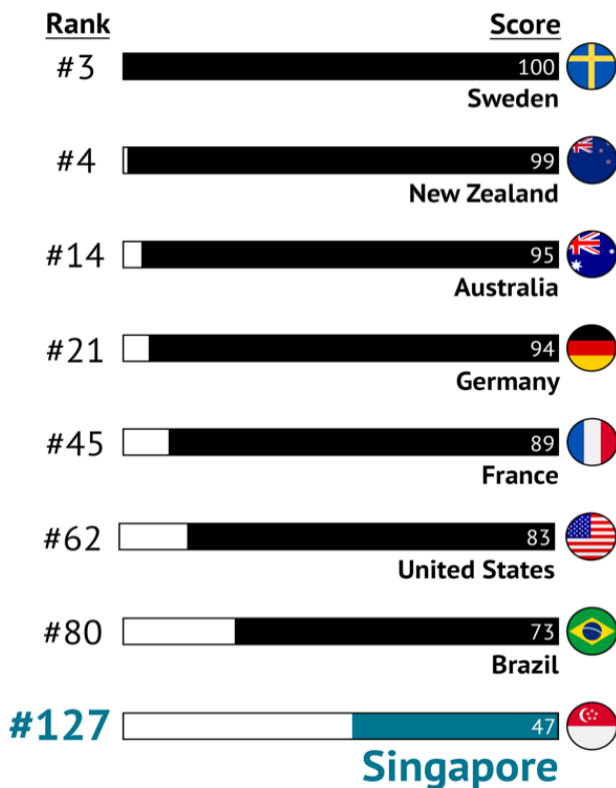


Figure 8. Freedom House ranks Singapore 127<sup>th</sup> with a score of 47, placing it below all countries examined in this report.<sup>138</sup>

This law has drawn ire from critics who argue that it is used to quash political debate and any criticism of the government.<sup>134</sup> Common

targets of such criticism are the government’s handling of corruption, discrimination, the pandemic, and its management of public funds.<sup>135</sup>

Confirming the validity of such fears, the law has been applied primarily to opposition party members, especially in the run-up to the 2020 general elections. Four days after the election, Reuters reported that opposition party members had been served numerous correction orders, while the party in power (the People’s Action Party) had been served no such orders.<sup>136</sup>

The law’s effect on political speech caused the World Press Freedom Index to lower its ranking of Singapore in 2021, placing it well below Russia and Myanmar, both authoritarian regimes (see Appendix C-2).<sup>137</sup> And Freedom House gives it a low score of 47 in political rights and civil liberties (see Figure 8).<sup>138</sup>

Pushback from Singapore’s citizens seemed to lead the government to propose changes: As we were completing this report, a government-set, public-comment period on improving the law was coming to a close.<sup>139</sup>

The anti-democratic steps taken in Brazil and Singapore underscore the hard reality that democracy is in decline worldwide.

There are, fortunately, exceptions.

## Steps Toward Democracy

Chile and Colombia, for example, just elected progressive presidents in “historic shifts” in leadership, signifying a democratic wave in both nations.<sup>140</sup> Priorities of the new leaders include greater economic equity, environmental protection, and improved government-citizen relations.<sup>141</sup>

Chile’s Freedom Score is 94, a status enjoyed by only a few dozen countries and well ahead of the U.S. Chileans rejected President Gabriel Boric’s sweeping constitutional rewrite, but at age 36 he is not giving up, only pledging to move more gradually.<sup>142</sup>

In Colombia, new priorities include peace talks with insurgents, expanding citizen participation, and agrarian reform.<sup>143</sup> Its Freedom Score is

only 64, but these changes could bring significant improvement.<sup>144</sup>

In fact, amid today’s discouraging realities, there are many advances from which we can take positive lessons. Note that in Germany it was in part the failure of the U.S. to prevent damage from harmful lies in our recent elections that triggered their new, protective steps.

So, let us now turn to such encouraging developments—truly what motivated this report: national innovations in New Zealand, Australia, Germany, France, and Sweden, as well as steps taken by the E.U. to contain disinformation and misinformation while also protecting freedom of speech.

# Social Networks



Facebook



Instagram



Twitter



Google+



Pinterest



Tumblr



LinkedIn



WhatsApp



Messenger

# Media and Democracy: Helpful Lessons From a Range of Nations

## New Zealand: A Standout in Upholding Public Standards, Transparency, and Citizen Participation in Solutions

On March 15<sup>th</sup>, 2019, in Christchurch, New Zealand, a young Australian, active on extreme-right internet forums, entered two mosques and murdered 51 people—the single largest loss of life to terrorism in the country’s history.<sup>145</sup> He livestreamed the rampage on Facebook.<sup>146</sup> It took the platform 90 minutes to take down the original livestream and 24 hours to remove 1.5 million reshares from those first 90 minutes.<sup>147</sup> As of mid-2022, many clips from the initial video remain across various internet platforms, having amassed thousands of views.<sup>148</sup>

Three years later, at a grocery store in Buffalo, New York, an 18-year-old murdered ten African Americans in an explicit hate crime. *The New York Times* reported that the accused said, “he drew inspiration from a livestreamed attack from the Christchurch shooting.”<sup>149</sup>

“With a score of 99, Freedom House ranks New Zealand fourth worldwide in ‘global freedom,’ a measure of political rights and civil liberties.”

The Christchurch tragedy spawned a range of strategies to combat misinformation and disinformation in New Zealand, ultimately

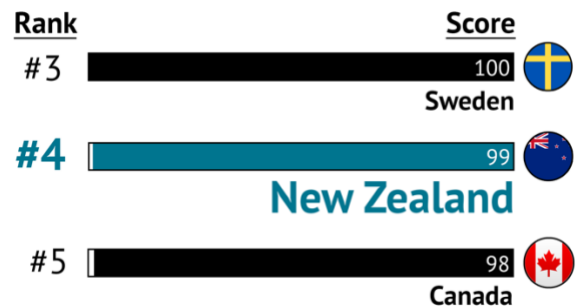


Figure 9. Freedom House ranks New Zealand 4<sup>th</sup> with a score of 99, placing it between Sweden and Canada.<sup>150</sup>

making the country a world leader in meeting this challenge. It uses in-depth research, online-safety campaigns, and a publicly sponsored online, transparent system for reporting and correcting disinformation.

As you read about New Zealand’s leadership in confronting disinformation, keep in mind that Freedom House gives the country a score of 99, placing it fourth worldwide in “global freedom,” a measure of political rights and civil liberties (see Figure 9).<sup>150</sup> We hope this confluence of strengths assuages doubts about humanity’s capacity to simultaneously protect against harm and ensure freedom of expression.

### Five Key Tools

Here is an overview of New Zealand’s tools to protect honest exchange:

First, **Broadcast Standards Authority (BSA)**, a public entity within the Ministry of Culture,

offers a unique approach to ensuring the integrity of television and radio programming. Established in 1989, the BSA manages an online, independent, transparent complaint system responsible for upholding broadcasting standards.<sup>151</sup>

Its stated goals?

Most broadly: “To create a confident and connected culture.”<sup>152</sup> And more specifically, it seeks “to prevent harm to New Zealanders, while fairly balancing the broadcasters’ right to freedom of expression and reflecting the values of New Zealand’s liberal democratic society.”<sup>153</sup>

The Broadcasting Act of 1989 requires all television broadcasts to inform New Zealanders how to register a complaint about content that is false, harmful, or both.<sup>154</sup> The law spells out that the frequency of broadcasters’ notices informing viewers how to submit a complaint. They must be equivalent each year to one notice per day of broadcasting and at varied times, including prime time and during children’s programming.

The BSA can only act to challenge a broadcaster in response to such a complaint.<sup>155</sup>

The BSA offers guidance for parents as well. Here is an example of one televised announcement from the BSA:

*“It can be tough to keep up with what our tamariki (Māori for ‘children’) are watching. Luckily, the Broadcasting Standards Authority has made some smart changes to help you avoid any unwanted moments. Find out more at [safeviewing.co.nz](http://safeviewing.co.nz).”*

The BSA website offers full transparency, so any visitor can see all complaints and learn whether

they were upheld. As transparency instills trust, and trust is a bedrock of democracy, BSA’s commitment to giving citizens easy access to its decisions fortifies democracy itself. The BSA’s broadcasting standards cover 11 themes laid out in the Broadcasting Act: good taste and decency, program information, children’s interests, violence, law and order, discrimination and denigration, alcohol, balance, accuracy, privacy, and fairness.<sup>156</sup>

Note the Authority’s standards covering balance and accuracy: Balance requires presentation of “competing viewpoints” and applies to news, current affairs, and informational programs on controversial issues of public importance. Its protection against misinformation involves avoiding both incorrect statements and “a wrong idea or impression of the facts.”<sup>157</sup>

“The Broadcast Standards Authority website offers full transparency, as any visitor can see all complaints and learn whether they were upheld ...[and] transparency instills trust...a bedrock of democracy.”

However, comments, analysis, and opinion are exempt from the accuracy requirement. Also note that if a broadcaster has made “reasonable efforts” to ensure a program is accurate, but untrue content is *accidentally* released, the broadcaster is not held accountable.<sup>158</sup>

When assessing complaints, the BSA seeks to uphold what it calls a “balancing process” or

“proportionality.” It tries to determine whether “the social benefit of the decision to uphold a complaint exceeds the social loss caused by the encroachment on the right to freedom of expression.”<sup>159</sup>

“The BSA’s priority is broadcasters’ freedom of expression.”

In this process, BSA’s priority is broadcasters’ freedom of expression. Only with the strongest justification can it restrict such freedom for programs that are of “legitimate public interest”—referring to those covering political issues and providing a forum for debate.<sup>160</sup>

However, it will penalize broadcasters if they do one or more of the following:<sup>161</sup>

- Misinform the public about important matters.
- Unfairly harm the dignity or reputation of the people they feature.
- Leave out significant viewpoints on issues of public concern.

Penalties can include fines of up to \$5,000, reimbursement of legal fees to the complainant, or broadcasting restriction up to 24 hours.<sup>162</sup>

The BSA, for example, penalized Mainland Television Limited—a regional broadcast on an American faith-based network—for violating its standard for accuracy.<sup>163</sup> The offending show, *Marcus and Joni*, was found to be spreading misinformation about vaccines and promoting the false narrative that vitamins and other “natural remedies” can effectively prevent or treat COVID-19.<sup>164</sup>

In response, the BSA ordered both Mainland Television Limited and Daystar Television to pay the government \$500 within a month. Additionally, it required Daystar Television to broadcast a statement summarizing key aspects of the Authority’s decision with accurate information. Moreover, the statement had to appear during a program similar to *Marcus and Joni* and airing on the same day of the week.<sup>165</sup>

Another illustrative example?

On the *Magic Mornings* talk show, the host’s discussion with callers included characterizations of Māori culture as “Stone Age” and violent. The BSA deemed it to be a denigration of the native Māori under its standard covering Discrimination and Denigration.<sup>166</sup>

Citizen complaints that are upheld lead to removal. In the year 2020-2021, the share of citizen complaints that BSA upheld was just over 7 percent, an outcome suggesting a cautious approach by the Authority.<sup>167</sup> It seems likely that BSA’s reporting system itself reduces the occurrence of disinformation—perhaps reflecting the all-too-human tendency to behave better when we know someone is watching.

Second, the **Classification Office** is a public agency helping to build trust and fight disinformation, which appoints an independent official called the Chief Censor to oversee content regulation.<sup>168</sup>

You may gasp, “*Censor! What? How could this job not undermine free expression?*”

But that’s not how the New Zealanders with whom we spoke think about it. The “censor” is an independent, government-appointed official



whose role is that of a content regulator—responsible for classifying, restricting, or banning harmful material. Categories include “everything from Hollywood blockbusters to terrorist videos, child pornography to t-shirts and pamphlets,” reported *The Guardian* in 2020.<sup>169</sup>

“Citizen complaints that are upheld lead to removal. In the year 2020-2021, the share of citizen complaints that the BSA upheld was just over 7 percent, an outcome suggesting a cautious approach.”

David Shanks, whose five-year term as Chief Censor ended in mid-2022, takes seriously what he calls the “science of harm—something measurable, quantifiable—as a justification for the work of his office.”<sup>170</sup>

His purpose? To limit that harm, he argues. An example of media his office had removed was a publication deemed to provide “exhortations to followers to kill, the rationale for killing unnamed people, [and] for killing women and children,” Shanks told us. “If you give a terrorist freedom of speech, they just use it as a weapon, and once people let that gain the upper hand, your freedoms, your rights, they will be the first things that they will crush.”

Some see a Chief Censor’s job, by definition, as stifling speech. But Shanks notes that limits already exist. Private social media companies often choose to censor or de-platform people.

It is better, he believes, to have a transparent agent looking out for the public interest. “[I]f you don’t have any [public] authority that makes those calls,” he argues, “you abdicate [the power] to the private sector and also to invisible kinds of bureaucrats and groups—all operating in a disorganized way that nobody can make any sense of.”<sup>171</sup>

Reactions to Shanks’ title seem to amuse him: “I’d introduce myself as, ‘Hi, I’m David, New Zealand’s chief censor’ ...and basically these people would take an involuntary step backwards.”<sup>172</sup>

Shanks stresses that his strategy encompasses more than just removing content and offers three key suggestions for avoiding the harm from disinformation and hate speech:

- Require social media platforms to be more transparent about their rules governing online behavior and how they enforce those rules.
- Educate people to be savvy social media consumers who are not sucked in by misinformation.
- Foster capacities within civil society and community organizations to expose disinformation and hate speech on the internet.<sup>173</sup>

Talking with us, Shanks acknowledged that his work was difficult and that New Zealanders “still feel real anxiety about public lies.” Indeed, in 2021, his office released a report—*The Edge of the Infodemic*—confirming that over 80 percent of New Zealanders polled believe that “exposure to misinformation is common, and concern is widespread” and that “something should be done.”<sup>174</sup>

Shanks told us that he is grateful that his country’s related public agencies are working together on this problem.

Although New Zealand’s laws and systems addressing misinformation and disinformation are not a perfect solution—and do not claim to be—they offer three distinct lessons:

First, government that has earned a high degree of trust can address misinformation and disinformation while also providing abundant protection of freedom of speech. Second, New Zealand’s media-oversight system appears to affirm that protecting against disinformation is more possible in a process in which citizens themselves initiate complaints. Third, when decisions are both transparent and demonstrate caution, they are more likely to inspire trust.

A third tool, the **New Zealand Media Council (NZMC)**, is not a public agency like the Broadcast Standards Authority and the Classification Office. It’s an independent body funded by the print-media industry. Since 1972, it has worked to resolve complaints about the content of newspapers, magazines, and periodicals as well as associated websites and online content.<sup>175</sup>

“Protecting against disinformation seems more possible when citizens themselves initiate complaints and decisions are both transparent and demonstrate caution. Both inspire trust.”

Anyone can lodge a complaint with the Council, but to be considered it must first have been taken to “the originator of the material” and “remain unsolved.”<sup>176</sup>

This fourteen-member Council includes one independent chair, one executive director, seven members representing the public, two representing the Newspaper Publishers’ Association, one representing magazine publishers, and two journalists appointed by the journalists’ union.<sup>177</sup> Note the diversity of representation.

“As with the Broadcast Standards Authority, rulings and rationale of the Media Council are transparent on its website.”

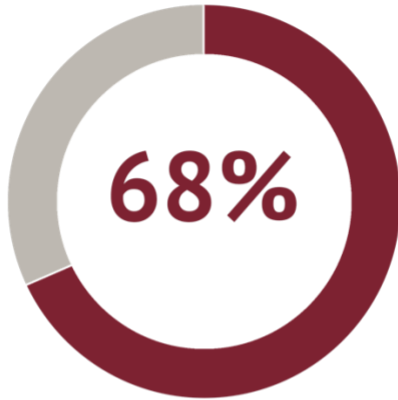
As with the BSA, rulings and rationale are transparent on the Council’s website. Its mission is to promote media freedom while maintaining a press “in accordance with the highest professional standards.”<sup>178</sup>

The Media Council has 12 guiding principles. Among them are accuracy, fairness, balance, prevention of conflict of interest, and a responsibility to publish corrections as needed.<sup>179</sup>

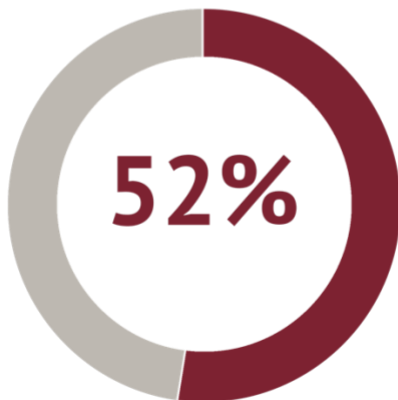
Fourth comes **NetSafe**, a public, online-safety organization founded in 1998. Netsafe offers tools for evaluating news sources to minimize online safety risks and ensure the responsible use of technology. It is empowered by New Zealand’s 2015 Harmful Digital Communications Act (HDCA), which lays out 10 principles to guide online communication and offers specific, protective guides, such as how to avoid online bullying.<sup>180</sup>

Formed by the New Zealand Police, the Ministry of Education, and several civic

## 2021 Netsafe “The State of the Online Nation” Survey



**68% believed “the internet is more dangerous than it was five years ago.”**



**52% expected it to be “more dangerous in 2026.”**

Figure 10. A 2021 Netsafe “State of the Online Nation” survey found that 68% of respondents believed that “the internet is more dangerous than it was five years ago,” and that 52% of respondents expected the internet to be “more dangerous in 2026.”<sup>182</sup>

organizations, Netsafe aims to resolve breaches of the HDCA principles noted above and to promote tools for how to effectively communicate online. It also investigates complaints of digital harassment and scams.<sup>181</sup>

In 2021, Netsafe sponsored “The State of the Online Nation” survey that found 68 percent of respondents believed “the internet is more dangerous than it was five years ago.”<sup>182</sup> About half expected it to be “more dangerous in 2026,” (see Figure 10).<sup>183</sup>

Netsafe operates under the nation’s Ombudsman office that handles “complaints about and investigates the administrative conduct of public sector agencies.”<sup>184</sup> In 1809, Sweden, on which we will soon focus, was the first country to establish such a position, and today 94 countries reported on their ombudsman experience in a 2018 global OECD survey.<sup>185</sup>

Fifth is **Your News Bulletin**, an online tool created by NetSafe and Facebook. The Bulletin also works “to target misinformation and disinformation by educating the public,” with a focus on the election season. Its quizzes and exercises enable users to “test their ability to identify fake news and learn new skills.”<sup>186</sup>

### *Reflections on New Zealand’s Experience*

Interestingly, a study appears to have had real-time impact aimed at minimizing the damage of disinformation in New Zealand:

In the 2020 New Zealand Social Media Study (NZSMS), Dr. Mona Krewel and Professor Jack Vowles, professors at the Victoria University of Wellington, examined thousands of social media posts from each party during the final four weeks of the 2020 election and reported which parties and leaders were most likely to post false information. The study tracked the percentage of Facebook posts that were “fake news” as well as “half-truths” by all parties.<sup>187</sup>

“Over the course of a political campaign, when two New Zealand professors tracked and made public ‘fake news’ and ‘half-truths,’ the percentage posted of both decreased.”

Each week throughout the 2020 election campaign they reported their findings, making them free and available for republication. Most importantly, the findings were widely reported and observed by all political parties.

The impact? Determining cause-and-effect is impossible, of course, but positive change was measurable.

Over the course of the campaign, the percentage of half-truths posted greatly decreased. Professor Vowles noted that it “could be an effect of the parties and their leaders knowing a lot of fact-checkers, including our project, kept a sharp eye on them.”<sup>188</sup> “Fake news” posts also decreased, possibly because parties became more aware of the potential for public exposure.<sup>189</sup>

NZSMS’s accessible research may have also influenced Facebook’s decision to “deplatform” the page of a short-lived fringe party, Advance New Zealand, after it spread misinformation about COVID-19.<sup>190</sup>

Of course, New Zealanders do not claim to have solved the disinformation problem. “People here still feel a lot of anxiety about the lies,” David Shanks told us in 2022 when he completed his term as head of the country’s

Classification Office that had published *Edge of the Infodemic*.<sup>191</sup> He lamented: “Our regulatory framework is outdated. And in practical terms, I think I’d struggle to say it is fit for purpose in the current environment.”<sup>192</sup>

“By and large,” he says, “the line between what’s lawful and what’s not is ‘roughly right.’ Pressure needs to remain on online platforms to better police material that’s not necessarily illegal, but still harmful.”

He notes that, “we have standards of accuracy, fairness, and balance for news media, and a watchdog and regulatory framework that people understand and is sometimes tested.” He believes the public can develop “rules that apply [to online content] in order to keep that space workable.”<sup>193</sup>

In New Zealand, cautious engagement by each of these initiatives and organizations helps to explain why Transparency International ranks the country as least corrupt (tied with Denmark and Finland) worldwide in its *Corruption Perceptions Index*, measuring how “corrupt public sectors are perceived to be.”<sup>194</sup>

“In its *Corruption Perceptions Index* Transparency International ranks New Zealand first (tied with Denmark) as the least corrupt worldwide.”

In stark contrast, the *Corruption Perceptions Index* places the U.S. behind 26 nations, between Chile and Barbados.<sup>195</sup>

## Australia Combines Laws and Voluntary Measures

New Zealand's experience has made waves in Australia. In 2019, only a few weeks after the livestreaming of two consecutive mass shootings at mosques in Christchurch, New Zealand, Australia's House of Representatives took action. It passed legislation requiring social media platforms to "expeditiously" remove content showing kidnappings, murders, rapes, or terrorist attacks.<sup>196</sup>

The legislation states that anyone who "provides a content service [and] fails to cut such content in a timely fashion could face prison time, and companies could be fined up to 10 percent of their annual profit."<sup>197</sup>

This Law Against Violent Media Content puts Australia at the center of the global debate about free speech, censorship, and content moderation. In a 2019 *New York Times* report, then Australia's attorney general, Christian Porter, defended the new law—underscoring that "these platforms should not be weaponized...Internet platforms must take the spread of abhorrent violent material online seriously."<sup>198</sup>

### *Holding Tech Companies to Account*

In addition to targeting violent online content, Australia has also been a leader in the fight against disinformation. In 2019, its government asked digital platforms to collaborate in developing a voluntary code to address misinformation and disinformation.<sup>199</sup>

In early 2021, eight digital platforms, including Google, Apple, Facebook, and Twitter, adopted a voluntary, industry-led Australian Code of

Practice on Disinformation and Misinformation.<sup>200</sup>

"As of mid-2022, Adobe, Apple, Facebook, Google, Microsoft, Redbubble, TikTok, and Twitter have adopted the Australian Code of Practice on Disinformation and Misinformation."

Becoming a signatory to the Code requires two main steps:

First, committing to the code's core objective: "to provide safeguards against harms that may be caused by disinformation and misinformation."<sup>201</sup> The code defines misinformation and disinformation as "digital content verifiably false or misleading or deceptive, propagated by users of digital platforms and...reasonably likely to cause harm."<sup>202</sup>

Second, submitting a progress report three months after adoption, followed up annually with a transparency report on efforts under the code. Reports must include a formal analysis of user exposure to disinformation on the platform as well as information on the detection and removal of content violating platform policy. These reports are open to the public and are used to improve the code's efficacy over time.<sup>203</sup> In May 2021, the eight companies that agreed to the code published their first reports.<sup>204</sup>

Signatories must also enable users to report behavior or content that violates the rules.

Becoming a signatory to the code is voluntary, and members can withdraw at any point. The code's opt-in nature raises the question: Can it be truly effective in combatting disinformation in the long run?

We shall see.

Most digital platforms rely on their own policy frameworks to regulate content, and many have internal reporting and complaint systems for responding to disinformation and misinformation.<sup>205</sup> In Australia, these reports note such common actions as removing false and harmful content, applying a label or warning to the content, and suspending or deleting accounts with multiple policy breaches.

“In March of 2022, Australia’s government publicly announced it was taking on Big Tech with its plan for a new law giving the Australian Communication and Media Authority increased power to hold tech companies accountable for harmful online content.”

Support for these steps is likely to be strong. Three-quarters of Australian respondents in a recent poll “thought online platforms should do more to cut the amount of false and misleading content online.”<sup>206</sup> And memories of pandemic misinformation might spur ever-wider support, given that four-fifths of Australian adults

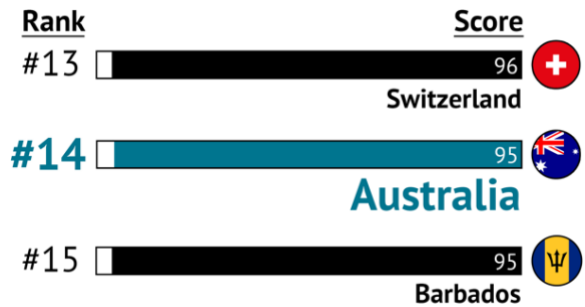


Figure 11. Freedom House ranks Australia 14th with a score of 95, placing it between Switzerland and Barbados.<sup>212</sup>

adults report that they “experienced misinformation about COVID-19.”<sup>207</sup>

The Australian Parliament also produced a “briefing book” on fake news with a record of action from several nations as well as examples of Australian efforts to combat it.<sup>208</sup> In March of 2022, Australia’s government publicly announced it was taking on Big Tech with its plan for a new law giving the Australian Communication and Media Authority increased power to hold tech companies accountable for harmful online content. The law would put Australia in line with efforts of Europe.<sup>209</sup> As of mid-2022, legislation is expected to be introduced within the year, with approval possible by early next year.<sup>210</sup>

In striking contrast, the U.S. Congress “has not passed a single piece of comprehensive regulation to protect internet consumers,” reports *The New York Times*.<sup>211</sup>

Australia’s efforts have much to teach the rest of us about fighting disinformation while protecting freedom and democracy. Note that Freedom House gives the country a score of 95 in “political rights and civil liberties,” placing it 14<sup>th</sup> worldwide, just below Switzerland (see Figure 11).<sup>212</sup>

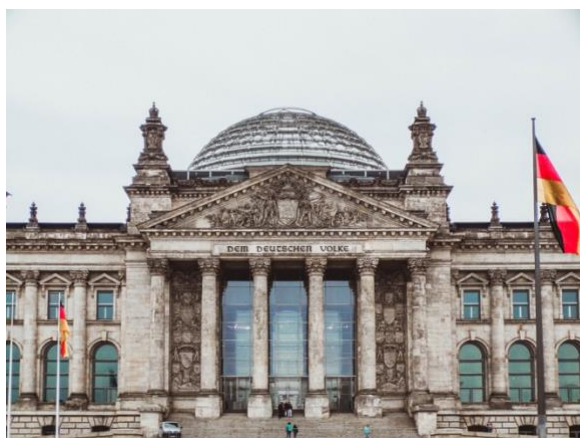
## Germany: Setting Higher Standards for Social Media

Germany has also taken strong legislative measures to combat disinformation and online hate speech, and we in the U.S. appear to have provided a big nudge.

In part motivated by the destructive tenor and misinformation of the 2016 U.S. elections, in 2017 Germany passed the Network Enforcement Act, otherwise known as the “Facebook Act,” aimed at combatting hate speech and fake news on social networks.<sup>213</sup> It applies only to social media platforms with at least two million registered users in Germany and excludes platforms posting “original journalistic content” and “email or messaging services.”<sup>214</sup>

While reports of fake news during U.S. election campaigns fueled fears among Germans about their own electoral process, surveys conducted after the German elections in 2017 revealed that these fears had been unfounded.<sup>215</sup>

Sadly, however, a majority of the public still believed that fake news had indeed played a major role in their elections.<sup>216</sup> This finding suggests that once fear of deception takes hold, it can be hard to dislodge.



Germany's Reichstag, a government building.

In 2021, Germany therefore moved to create stronger rules governing social media platforms. The Network Enforcement Act, which already imposed “high fines for noncompliance with existing legal obligations,” was amended to increase “comparability of social media providers’ transparency reports and improve the user-friendliness of the reporting channels for complaints about unlawful content.”<sup>217</sup>

“Motivated by the destructive tenor and misinformation of the 2016 U.S. elections, in 2017, Germany passed the Network Enforcement Act, otherwise known as the “Facebook Act” aimed at combatting hate speech and fake news on social networks.”

Moreover, the amendment aimed to strengthen Germany’s online safety measures and to increase “information content.”<sup>218</sup> It also added a procedure for users to appeal decisions taken by social network providers or video-sharing platform services.<sup>219</sup>

The Act requires the removal of “clearly illegal” content within 24 hours of receiving a user complaint. If the illegality is unclear, the platform has seven days to investigate the content, and, if deemed illegal by the Press Council, delete it.<sup>220</sup>

The deadline may be extended if, to perform the vetting process, for example, the social network hires an independent agency, otherwise known as a recognized “Agency of Regulated Self-Regulation.”<sup>221</sup> (Hmm, there’s a title to ponder!) Failure to comply can result in a fine of up to 50 million euros (roughly US \$59 million).<sup>222</sup>

“The Act requires the removal of ‘clearly illegal’ content within 24 hours of receiving a user complaint. If the illegality is unclear, the platform has seven days to investigate the content, and, if deemed illegal by the Press Council, delete it.”

The Act defines illegal content based on Germany’s Criminal Code in categories that include defamation, dissemination of propaganda, symbols of unconstitutional organizations, and “encouragement of serious violent offenses that would endanger the state.”<sup>223</sup>

Under this law, social media platforms must also offer users an “easy and transparent complaint mechanism that is constantly available.”<sup>224</sup> Networks receiving more than 100 complaints about illegal content in any one year are required to publish biannual reports on how they are addressing these complaints. Each network’s compliance report must be published in the government journal *Federal Gazette* and be easily accessible on the network’s homepage.<sup>225</sup>

From its introduction in 2017, the Network Enforcement Act has met with considerable criticism and has been deemed by some an unconstitutional infringement on free speech.<sup>226</sup>

However, a study of the law’s impact after one year found the fear it would lead to “unnecessary takedowns” due to excessive caution was mostly unfounded. According to the study, “of the 992,039 messages on Facebook, YouTube, and Twitter that were notified as possibly unlawful, only 166,072 (amounting to 17 percent) were taken down by the platform,” and only one of more than a thousand lawsuits resulted in a fine to Facebook.<sup>227</sup>

Note that long before the Network Enforcement Act, Germany has had a Press Code (Pressekodex). Since 1956, the code has covered print media—laying out rules “pertaining to editorial data protection [in] gathering, processing, or using information about persons for journalistic-editorial purposes.”<sup>228</sup>

“One year after passing Network Enforcement Act, a study found the fear it would lead to ‘unnecessary takedowns’ due to excessive caution was mostly unfounded.”

The Code is enforced by the German Press Council, representing both publishers’ and journalists’ associations.<sup>229</sup> Describing itself as voluntary and self-regulatory, the Council is



comprised of two publishing and two journalists’ organizations. Inspired by the 1953 British Press Council, it addresses readers’ complaints and monitors journalists’ compliance with “ethical rules” of their profession spelled out in the German Press Code, says the Council’s website.<sup>230</sup>

Note that German constitutional law requires electronic information and communication services providing journalistic content to meet recognized journalistic standards. But the law does not establish any legal consequences for violating these standards, such as when graphics are “distorted or falsified” by photo editing or misleading captions.<sup>231</sup>

Public reprimands are the only sanctions available to the German Press Council.<sup>232</sup>

### *Punishing Defamation*

Already prohibited in Germany is the assertion or dissemination of personal information that is false or cannot be proven as true.<sup>233</sup> To be considered defamation, the false information must be capable of negatively affecting public opinion of a person.

Germany punishes defamation with imprisonment of up to five years or a fine.<sup>234</sup> If the defamation is directed toward politicians and makes their public activities substantially more difficult, punishment is imprisonment ranging from three months to five years.<sup>235</sup> Because social networks are generally considered public places—except where information is posted in closed groups—defamation of a politician on social media in Germany could also become punishable.<sup>236</sup>

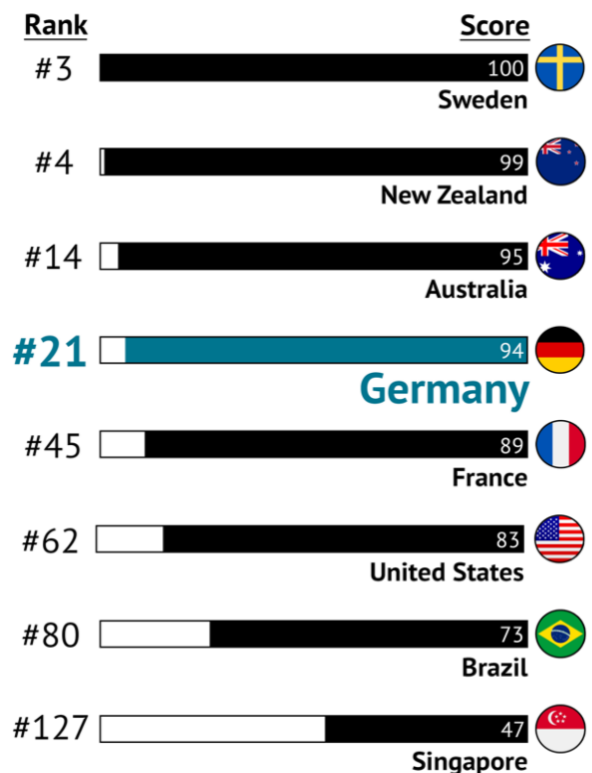


Figure 12 Freedom House ranks Germany 21st with a score of 94, placing it in the middle relative to other countries examined in this report.<sup>240</sup>

Note that both intentional and unintentional defamation are prosecuted only upon the victim’s request. The Public Prosecutor is “responsible for serious cases relating to crimes against international law and crimes concerning state security.”<sup>237</sup> In addition, “anyone seeking criminal prosecution for defamation may also sue for libel in civil court and request a preliminary injunction.”<sup>238</sup>

Note that these rules do not prevent Germany from a high ranking of 16<sup>th</sup> worldwide in “press freedom.” By contrast, the U.S. is way down at 42<sup>nd</sup>.<sup>239</sup> These strong German protections are likely one reason Freedom House gives Germany a score of 94 in political rights and civil liberties—ranking it 21<sup>st</sup> in “global freedom” (see Figure 12).<sup>240</sup>

“The 1996 Communications Decency Act states that ‘No provider or user of an interactive computer service shall be treated as publisher or speaker of any information provided by another information content provider.’”

The U.S., by contrast, has no federal law protecting against defamation. However, 23 states and two territories do have criminal defamation, libel, and/or slander laws.<sup>241</sup> Because of First Amendment protections and the fact that the definition of defamation varies

by state, it is much more difficult to sue for defamation in the U.S. than it is in Germany.

Furthermore, it is harder to hold online platforms accountable in the U.S. because provision 230 of our 1996 Communications Decency Act states that, “No provider or user of an interactive computer service shall be treated as publisher or speaker of any information provided by another information content provider.”<sup>242</sup>

Essentially, this distinction protects internet providers and social media platforms that repost dangerous content because they are not considered to be publishers of others’ information.<sup>243</sup>

Now to France, where legislative action also seeks to protect trustworthy communication.

## France Fights Information Manipulation on Several Fronts

In 2017, France experienced a loud wake-up call. Russian military intelligence officers hacked emails and documents of French President Emanuel Macron’s campaign team.<sup>244</sup> The so-called leaks—including both genuine and fabricated campaign material—began with WikiLeaks and were spread via social media, then amplified by the U.S. far right.<sup>245</sup>

Subsequently, President Macron, and the French government more broadly, have taken steps to combat misinformation and disinformation, especially around elections. In January 2018, Macron announced his plan to introduce a law to fight “information manipulation” on the internet during election campaigns.<sup>246</sup>

That year, parliament passed the Law Against Information Manipulation, allowing candidates to sue for the removal of “contested news reports” during election campaigns and requiring social-media platforms to disclose funding sources for sponsored content.<sup>247</sup> It also requires judicial review of suspected fake news based on criteria in France’s 1881 law on freedom of the press.<sup>248</sup>

This law gives France’s Superior Audiovisual Council the authority to suspend media that “deliberately disseminate false information likely to affect the validity of an election.”<sup>249</sup> It is, as noted by Culture Minister Françoise Nyssen in 2018, a “precious tool for better protecting our democracy.”<sup>250</sup>

Nonetheless, the law stirred heated debate. The French Republican party accused Macron of trying to create “thought police,” and some journalists expressed worries that the law would threaten their work.<sup>251</sup> The Senate rejected it twice.<sup>252</sup>

“In France, the 2018 Law Against Information Manipulation allows candidates to sue for the removal of ‘contested news reports’ during election campaigns and requires social-media platforms to disclose funding sources for sponsored content.”

But Bruno Studer—the bill’s drafter and a politician from Macron’s party—defended the law, stressing that it focuses solely on combatting the “manipulation of information” and taking down disinformation that is “massively” spread online in the three-month period before an election.<sup>253</sup>

Then came an interesting twist: While Macron’s administration expected to face criticism of the law, they did not expect to become a subject of the law itself. In April of 2019, however, Twitter blocked the government’s own social media campaign.

The campaign was called “#OuiJeVote” (Yes, I Vote), a government effort to encourage voter registration. Twitter explained that it cut *all* sponsored political ads because it did not know how to comply with the law’s requirement that online platforms provide “fair, clear, and

transparent” information about who is paying for political advertisements.<sup>254</sup>

Sadly, Twitter chose to see participation in democracy as “political” in a partisan sense and government as a “sponsor,” rather than government fulfilling its nonpartisan duty to promote a public good—voting.<sup>255</sup>

Twitter’s decision frustrated French government officials. Some suggested Twitter was blocking the campaign simply to push the government to renegotiate the law.<sup>256</sup> Christophe Castaner, then France’s Minister of the Interior, argued in a tweet that Twitter’s priority should be combatting content promoting terrorism, not hampering voter registration campaigns.<sup>257</sup>

Surely, Twitter has ample resources to add a transparency process for users to learn who is paying for political advertisements. Instead, the company chose to take the easiest route and simply ban advertisements related to political engagement altogether, then blame the results on the Information Manipulation Law.

“France’s Minister of the Interior argued via a tweet that Twitter’s priority should be combatting content promoting terrorism, not hampering voter registration campaigns.”

We hope France will continue to push social media platforms to serve the public good.

## France Combats Online Hate Speech



Laetitia Avia, sponsor of France's Laetitia Avia bill to combat online hate speech, terrorist speech, and child pornography.<sup>258</sup>

Another bill in France related to fighting disinformation is the highly contested Laetitia Avia bill—named for its sponsor, a legislator whose parents emigrated from Togo and who has faced racist attacks.<sup>259</sup>

Proposed in July 2019, the bill's specific aim was to combat online hate speech, terrorist speech, and child pornography. Inspired by Germany's 2017 Network Enforcement Act, it would have required websites and networks to remove content containing hate speech. An offending website/network would face significant fines if it did not remove illegal content within 24 hours of a user reporting it.<sup>260</sup>

However, the French court rejected most of the proposed law. It determined that the "very short time frame" with which companies would have to make highly technical decisions on content removal "infringe[d] upon the exercise of freedom of expression."<sup>261</sup> The bill also failed

to include "preventative and educational measures" related to hate speech, complained the French National Consultative Commission on Human Rights.<sup>262</sup>

Nonetheless, after considerable debate, a version of the Avia law did pass in May 2020.<sup>263</sup> Though diluted, it reformed how hate speech crimes are handled, and most importantly, created a new office of national prosecutor focused on hate speech, both online and in print.<sup>264</sup>

## Users Fight Disinformation in France

The key to power in French efforts to fight disinformation is user action. In its Laetitia Avia bill, the process of removing content relies on users reporting what they believe to be harmful.<sup>265</sup> Therefore, even strict penalties for disseminating false information won't prevent the spread of disinformation and misinformation unless internet users are educated to recognize signs of suspicious information and sources and feel empowered to act.

While the core provisions of France's Laetitia Avia bill for reporting and removal were eliminated, some remaining do have teeth.

One requires social media platforms to "simplify their notification process" for users to report harmful content. Another provision calls for "an independent observatory of online hate speech."<sup>266</sup> Today it exists as the "Pôle National de Lutte Contre la Haine en Ligne," (National Center for the Fight Against Online Hate Speech). Here, six civil judges pursue justice in the most serious cases of hate speech and online harassment.<sup>267</sup>

## France Opens New Office to Fight Foreign “Fake News”

In addition to the legislative efforts outlined above, France created a new agency focused on combating “foreign fake news.” First proposed in the spring of 2021 as part of the country’s preparation for 2022 presidential election, it is to be run by the Secretariat-General for National Defense and Security (SGNDS).<sup>268</sup>

The agency will function as an “ethics committee” rather than an intelligence service, explains the SGNDS chief. Its purpose is not to define the truth, but rather to identify attacks from foreign groups and countries aimed at destabilizing the French state.<sup>269</sup>

“The purpose of the new office is not to define the truth, but to identify attacks from foreign groups and countries aimed at destabilizing the French state.”

Given France’s wide public awareness of the disinformation crisis and varied responses, we were surprised to find that Freedom House ranks it 45<sup>th</sup> worldwide in its Global Freedom Index (see Figure 12). Note, it still comes in seventeen points higher than the U.S.<sup>270</sup>

## Sweden’s “Psychological Defense” Against Disinformation

Now we turn to Sweden, an early leader in civil liberties. In 1777, Sweden became the first country to write freedom of the press into its constitution. Today, Freedom House ranks it—along with Finland and Norway—highest worldwide in political rights and civil liberties (see Figure 13).<sup>271</sup>

At the same time, Sweden imposes strict sanctions on hate speech and other actions that abuse the liberties protected by its constitution. It defines “hate speech” as the expression of “contempt for a national or ethnic group or other such group of persons with allusion to race, skin color, national or ethnic origin, creed or sexual orientation.”<sup>272</sup> The country’s courts also regard signs with xenophobic symbols and racist paraphernalia as forms of hate speech.<sup>273</sup>

Penalties imposed on individuals using hateful speech in media are tough: Fines and prison terms up to a maximum of four years. Laws criminalizing hate speech in Sweden also apply to print and broadcast media and online newspapers and journals.<sup>274</sup>

Like New Zealand, Sweden’s Media Council monitors speech liberties. It also emphasizes its mission to protect children from harmful media and educate them to be responsible media users.<sup>275</sup>

The fact that Freedom House gives Sweden a score of 100 in political rights and civil liberties respectively is worth noting here.<sup>276</sup> It again signals that enforceable standards can contribute to freedom, rather than suppress it.

## Sweden: Inventor of the Ombudsman

“Ombudsman” refers to an official with responsibility for receiving and acting on complaints by the public against government or businesses such as banks or insurance companies. The word “ombudsman” originates in Sweden, where it means “representative”—in this case, a representative of the people.

The Swedish office of press ombudsman opened in 1969.<sup>277</sup>

Today, the Office of Media Ombudsman is an independent “self-disciplinary” body that investigates cases of possible violation of press ethics. It fields complaints regarding the content of newspapers, magazines, broadcast media and their websites, as well as social media.<sup>278</sup>

“Any Swedish citizen, company, government authority, or organization that feels personally offended and/or damaged by published information can submit a complaint to the Media Ombudsman.”

Any Swedish citizen, company, government authority, or organization that feels personally offended and/or damaged by published information can submit a complaint to the Media Ombudsman, as long as it is within three months of the publication of the matter in question.

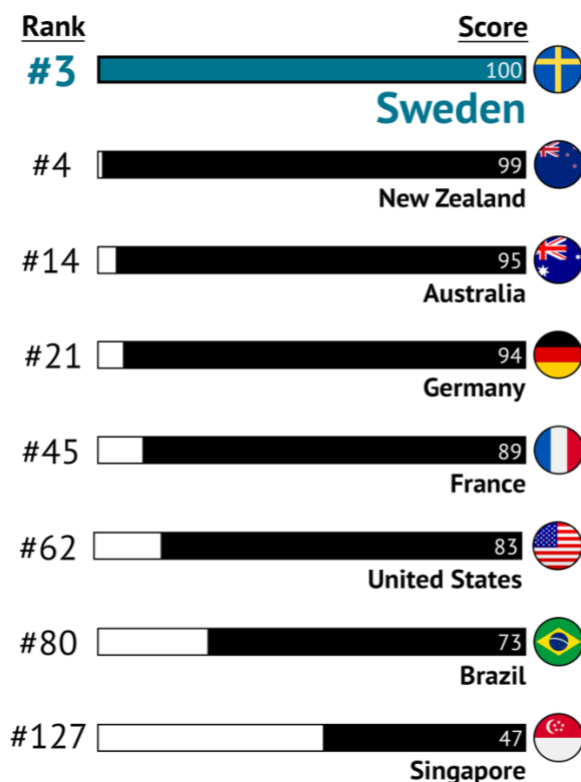


Figure 13. Freedom House ranks Sweden 3<sup>rd</sup> with a score of 100, making Sweden the highest ranked country out of those examined in this report.<sup>270</sup>

If the Media Ombudsman finds a publication has likely breached the rules, the case goes to the Media Council for review and decision. If it rules against the publication, the offender must publish a statement about the Council’s decision in the same channels as the original statement.<sup>279</sup>

## Defending Psychological Well-Being

In Sweden’s efforts to fight false information, election misinformation became a key concern leading up to the country’s 2018 general election. Later, in 2022, Prime Minister Stefan Löfven launched an agency to counter disinformation and foreign influence campaigns.<sup>280</sup>

The new agency was originally proposed by Sweden’s Parliamentary Defense Commission, one of Sweden’s 15 parliamentary committees focused on military and civil defense. Now part of the Ministry of Justice, it has two key departments:

The “Operations” department identifies, analyzes, and counters “malign foreign information” or disinformation spread with malicious intent by foreign actors. And the “Capability Development” department develops and strengthens the psychological defenses of Swedish citizens and society against suspicious and false information.<sup>281</sup>

“Sweden focuses more on promoting factual content than on blocking what’s false.”

On the website of the new Psychological Defense Agency is a FAQ section where one question jumps out: “Everyone can think and say what they want, right?”<sup>282</sup> And the Agency’s response? Well, yes and no...

*“Yes, in Sweden our freedom of speech and opinion is protected by the constitution. Government agencies also have a responsibility to ensure that there is awareness of foreign malign information influence activities and disinformation directed at Sweden. This is to protect vital societal functions, public health, and our fundamental values such as democracy, the rule of law, and fundamental human rights and freedoms.”<sup>283</sup>*

Sweden further confirms its commitment to tackling disinformation by educating citizens on how to spot fake news. In 2018, the Swedish Civil Contingencies Agency updated its public emergency preparedness brochure, *If Crisis or War Comes*, to include an entire section on false information.<sup>284</sup>

The brochure warns of potential foreign disinformation campaigns and includes tips for fact-checking. You can read more about these safeguards in an English version of the brochure available on the agency’s website.<sup>285</sup>

While Sweden isn’t the only country to establish an authority specifically aimed at confronting disinformation, it has taken a distinctive approach: Sweden focuses more on promoting factual content and educating users to effectively spot disinformation than on blocking what’s false. The government hopes that its emphasis on preparedness will be more effective and be met with less public resistance than a punishment-centered strategy.<sup>286</sup>

As we complete this report in the autumn of 2022, conflict over immigration policies in Sweden has arisen.<sup>287</sup> It is currently unclear what role disinformation is playing. Hopefully, the steps Sweden has already taken to combat disinformation, outlined above, will help.

We’ve chosen to focus on the national efforts of New Zealand, Australia, France, Germany, and Sweden because these countries have taken leadership in fighting disinformation, each in its unique way. But they are not the only nations taking important action. For a more extensive catalogue of anti-misinformation efforts from over fifty countries, we suggest Poynter Institute’s report: *A Guide to Anti-Misinformation Actions around the World*.<sup>288</sup>

## Other National Responses to Disinformation

National security and election security are the two most common concerns motivating politicians and other leaders to address online misinformation and disinformation. In a global 2018-2019 report, the Poynter Institute found the most common steps for fighting misinformation and disinformation across the world are laws and their enforcement, media literacy campaigns, taskforce actions, factfinding reports, investigations, and court rulings.<sup>289</sup>

In response to the rise in disinformation over the past decades, 2019 and 2020 saw a global upsurge in protections in online discourse. According to an article by the *Bulletin of the Atomic Scientists*, “at least 32 laws have been proposed, amended, or implemented to tackle misinformation....” since 2019 worldwide.<sup>290</sup>

Here are five examples of laws and other initiatives responding to disinformation, along with their country’s freedom category and score as determined by Freedom House (see Appendix C-1).

- **Canada: Free. Score: 98. A representative democracy with a parliamentary system.** Canada in 2019 established a media literacy campaign and government task force called the Critical Election Incident Public Protocol to monitor and notify other agencies and the public about disinformation attempts.<sup>291</sup> Legislation in 2018 also amended the Canada Elections Act to better protect against disinformation during elections.<sup>292</sup>
- **Belgium: Free. Score: 96. A democracy with a parliamentary system.**

Belgium in 2018 established an expert group of journalists and scholars to develop solutions and launch a media literacy campaign, including a website informing citizens about misinformation.

- **Hungary: Partly Free. Score: 69. A democracy with a parliamentary system.**

In 2020, Hungary introduced the Law on Protection against the Coronavirus, which punishes anyone publishing false information with five years in prison.<sup>293</sup>

- **Algeria: Not Free. Score: 32. A constitutional semi-presidential republic.**

Algeria in April 2020 amended its penal code to criminalize the spread of fake news that undermines public security and national unity.<sup>294</sup>

- **Zimbabwe. Not free. Score: 28. A presidential republic.**

Zimbabwe in 2020 introduced a new law specifically penalizing publication of false news “about any public officer, official or enforcement officer” involved with the country’s pandemic lockdown.<sup>295</sup>



The United Nations office located in Geneva, Switzerland.



During the global COVID-19 pandemic, many countries relied on existing laws to target COVID-19 misinformation. Thirteen countries, however—most of which have authoritarian regimes—introduced laws that have enabled some officials to weaponize pandemic misinformation and disinformation to solidify their power, limit free speech, and suppress opposition.<sup>296</sup>

In addition to national efforts explored here, the initiatives of major international organizations, such as the E.U. and the United Nations, could be key to establishing general norms for grappling with misinformation and disinformation.

### *The EU Acts to Reduce Risks and Monopoly Power*

In 2020, the European Commission proposed parallel laws—the Digital Services Act and Digital Markets Act—designed to reduce exposure to illegal content, protect the rights of internet users, and establish a transparent “accountability framework” for online platforms, as well as break up big tech companies’ tight control of online communication.<sup>297</sup>

“The Digital Markets Act requires big tech ‘gatekeeper’ platforms to allow smaller companies to compete for market share.”

Two years after their introduction in April 2022, the E.U. Parliament passed these Acts.<sup>298</sup>

Their goals are big: “greater democratic control and oversight over systemic platforms” and “mitigation of systemic risks, such as manipulation or disinformation.”<sup>299</sup> The Digital Services Act requires increased transparency for online platforms’ sponsored ads and how they target users. The Act also requires “very large platforms that reach more than 10 percent of the E.U.’s population” to prevent abuse of their systems “through independent audits of their risk management systems.”<sup>300</sup>

“The new Code, released in June of 2022, includes stricter content review mechanisms and increases advertising transparency and auditor access.”

The Digital Services Act could take legal force in late 2022, with mandatory compliance by 2024.<sup>301</sup>

While the Digital Services Act focuses on creating a safer online space, the Digital Markets Act fights monopoly power. It is effectively antitrust legislation.<sup>302</sup> The law requires big tech “gatekeeper” platforms to allow smaller companies to compete for market share and aims to prevent “gatekeepers from imposing unfair conditions on businesses and end users” and to ensure the “openness of important digital service.”<sup>303</sup> Furthermore, it empowers the European Commission to investigate and impose sanctions for non-compliance.<sup>304</sup>

By regulating the power of large “gatekeeper” companies, this legislation could help foster openness to new entries in the digital sector

while reducing monopoly control to give users greater choice.

Also, following guidance from the European Commission, in May 2021, many European media players strengthened their Code of Practice on Disinformation, first passed in 2018. Advertising-industry representatives, fact-checkers, along with research and civil society groups, took part in revising the Code to broaden commitments to fighting disinformation.<sup>305</sup>

The new Code, released in June 2022, includes stricter content review mechanisms and increases advertising transparency and auditor access.<sup>306</sup>

Note, however, that the signatories themselves choose which commitments they sign up for and are responsible for implementing.<sup>307</sup> Nonetheless, the “code has proven to be an effective tool to limit the spread of online disinformation, including during electoral periods, and to quickly respond to crises, such as the coronavirus pandemic and the war in Ukraine,” according to those involved.<sup>308</sup>



Empregos

O PIOR AINDA ESTÁ POR VIR, DIZ PREFEITO DE BH

Empregos

TRADICIONAL DIA DE PEIXES EM BH

Diversos

Diversos

Intervalo

ARBITRARIAMENTE  
O BOLSO E  
O MOCUDO

NILLO DO VIVIR  
MAIS DE 100  
FAZENDO EM

SOLAR

5422 adu

## Learning to Detect Disinformation, Even as Youngsters

For democracy to work, we citizens need to participate and be well-informed. We must be able to identify propaganda, bias in the news, and disinformation. None of this is new. But media systems have changed dramatically, leaving us with few guardrails or barriers to entry. Well-financed producers have learned highly sophisticated techniques of persuasion. For these reasons, media literacy has become as essential as traditional literacy for democratic societies.

“Estonia and Finland educate children in using media wisely, even in primary school curricular—giving it attention on par with core subjects such as math and science.”

For any challenge, preparation is key to success. Taking on disinformation is no exception.<sup>309</sup>

Step one is to “know it when you see it.” Of course, this isn’t always easy. Take, for example, a 2018 *New York Times* quiz for identifying which posts were generated by primarily bot-run accounts intended to manipulate users and which were by real users.<sup>310</sup> Try it.

No matter how educated we think we are, discerning the truth requires preparation all its own. Luckily, many resources exist to help us learn to spot disinformation. One very helpful

tool is Factcheck.org, run by the University of Pennsylvania’s Annenberg Public Policy Center.<sup>311</sup>

A number of countries are adding “media literacy” to their schools’ curricula. Finland and Estonia—both bordering Russia—have become recognized leaders in part because they include media literacy in primary school curricula.<sup>312</sup> Likely, this achievement is one reason they rank so high in Freedom House’s Global Freedom index. Finland ties Sweden and Norway for first place, with a score of 100; and Estonia places 18<sup>th</sup> just behind Iceland, with a score of 94 (see Figure 18).<sup>313</sup>

A BBC report explains how Estonia integrates media literacy into all aspects of formal learning:

For example, math teachers might dig into statistics, which are easily misunderstood or manipulated. Art classes analyze images and how advertisements or certain media depictions make viewers perceive things. Social studies classes could focus on war propaganda.<sup>314</sup>

Media literacy is critical not only because it helps citizens spot false information, but also because it can help us identify manipulation using factual information. To reduce the power of targeted, algorithm-generated manipulation of how we think and act, users can learn to stop, follow the source, and think critically about what is being presented. One approach is the SIFT technique noted earlier. Another resource is the Union of Concerned Scientists’

“Dos and Don’ts of Refuting Lies and Attacks,” (see Appendix A).

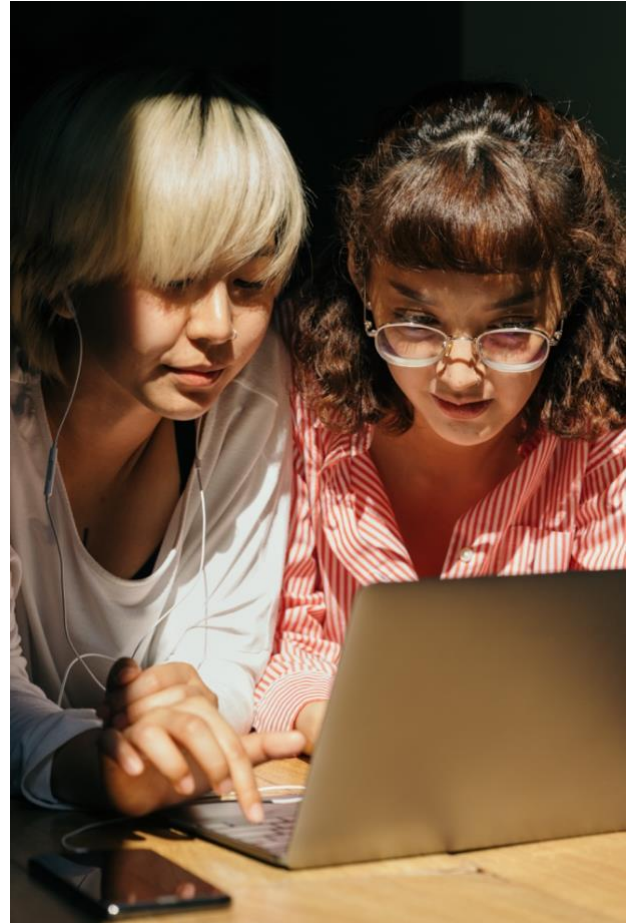
Media literacy is crucial in reducing the harm of misinformation and disinformation in part because it can shorten the critical time span between the posting of such content and its being reviewed and flagged. This is no small victory, as lies typically spread much faster than truth, causing tremendous harm along the way.

Yet, in preparing its citizens for the disinformation challenge, the U.S. is lagging.

We spoke with Erin McNeill of Massachusetts-based Media Literacy Now, who informed us that as of 2021, only one state, Illinois, explicitly requires schools to teach media literacy. In Florida and Ohio, laws require that teaching standards in all subjects incorporate media literacy, which is a positive step that advocates can build from, she said. But so far, these state governments have not monitored implementation, and anecdotal evidence suggests implementation is quite uneven.

In twelve other states, McNeill noted, legislators have taken steps to prioritize media literacy, which opens the door to resource allocation that supports teacher training and the rewriting of state education standards in many subjects. Meanwhile, even without legislative directives, some state educational agencies have been updating standards to include media literacy, especially in English language arts.

McNeill advocates for integrating media literacy into all subjects and laments that change is not happening fast enough. Media literacy education is currently happening in a patchwork fashion, as it often depends on individual champions and sometimes goes away when those individuals move on. “State



policy and guidance help the individual champions in school districts make change more quickly and more permanently,” she said. The good news is that interest is growing, she told us. Washington and New Mexico, for example, are funding teacher training for media literacy.

To underscore the importance of media literacy education, she noted an alarming Stanford study that included this finding; Of 3,446 students questioned, eight in ten students incorrectly identified an advertisement as a real news story, despite it being labeled as “sponsored content.”<sup>315</sup>

The classroom is not the only place to strengthen media literacy. We can start by talking within our families about the challenge

of navigating the Digital Age and how to meet it.

One helpful resource is MediaWise, a program through the Poynter Institute that helps people become more critical consumers of ever-changing modern media.<sup>316</sup> For a complete list of resources and movements to combat disinformation, see Appendices A and B.

In addition to public resources, one major private player, Google, has taken an interesting approach. Rather than focusing on “debunking” misinformation, it has been working alongside researchers at the University of Cambridge and Bristol to study the effects of “pre-emptive” user education—a tactic they call “pre-bunking.”<sup>317</sup>

Studies have found that educational warning videos about the existence and spread of misinformation on platforms like YouTube can heighten the public’s ability to identify falsehoods online.

The technique works much like a vaccine to “psychologically ‘inoculate’ internet users against internet lies,” and “cultivate ‘mental antibodies’ against fake news” before they are actually exposed to it, explain media reporters Nico Grant and Tiffany Hsu in *The New York Times*.<sup>318</sup>

To confront this enormous challenge, McNeill offers all of us the following advice: “Learn the techniques for critical thinking about media messages of all kinds, including advertising, entertainment, and news. Check your own biases. Stop and think about any message that gives you an emotional response.”

In our communities, McNeill encourages all of us “to talk with our local leaders what they are doing about media literacy.” We can each “approach our representatives in the statehouse, ask our school committee members and school superintendent.” She adds that “any member of the community can do this, not just parents of children in the system. It matters to all of us.”



## Strengthening Trust, Inspiring Democratic Action

Given the decline in democratic norms worldwide, it's easy to understand why some of us might begin to doubt humanity's capacity for democracy. We hope our accounts of those stepping up to the challenge of strengthening democracy will help assuage such self-defeating fears.

“Here's the tricky part: At least a modicum of trust is required to lay a solid foundation for trust.”

On the other hand, some readers may fear that the strategies described here to protect democracy could inhibit free speech and are therefore dangerous. The very first article of our constitution forbids any law “prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press.”

Seems clear-cut, right?

Perhaps it was at our nation's founding. Centuries later, of course, our media world has been transformed, giving the “speech” of billions the power to do great harm, even if inadvertently.

On our nation's commitment to free speech, we've all heard the clichéd exception: Shouting “fire” falsely in a crowded auditorium is not protected speech because of the harm it could trigger. This exception originates with Justice Oliver Wendell Holmes, Jr.'s 1919 opinion in the Supreme Court case *Schenck v. U.S.*<sup>319</sup>

It is easy to grasp. But is it an adequate reference point in today's world? Protective initiatives by nations profiled in this report reflect alarm not primarily about a single lie that could cause great harm—although our own “stolen election” lie certainly qualifies. Rather, they focus on the drip, drip, drip of false messages in our media-saturated lives; for it is accumulation of false or hate-filled messaging that has deadly potential.

None of the approaches covered in our report represent a perfect solution. As we've stressed, our theme is “lessons, not models.” Each nation offers unique challenges and opportunities. Thus, no model can be taken wholesale from one country to another. While there may be no definitive “right” answers, the innovations we explore suggest ways to publicly enforce rules that prevent—or at least greatly reduce—harmful disinformation while at the same time protecting freedom of speech.

We acknowledge that in this moment it is hard to imagine, for example, most Americans embracing approaches that rely on trusted public agencies for enforcement. The tricky part is this: At least a modicum of trust is required to lay a solid foundation for trust. And in America today, trust in government is low.

So, might key aspects of lessons learned from leading examples abroad, initially at least, be developed here at home by widely respected social-benefit organizations or universities?

Ultimately, all of us striving for a democracy offering both freedom of speech and protection from harm must weigh our choices. We opened this report noting that *both* values involve risk of devolution into autocracy. From that risk



there will never be complete freedom. In that sense, and in so many others, democracy is never “finished.”

Here we summarize two possible paths:

**Path One:** Resist any limit on speech—except for defamation and libel—no matter how vile, inaccurate, intentionally misleading, or threatening. On this path, a democracy risks further decline in social trust, as citizens turn against each other and become more likely to embrace would-be autocrats promising they alone can bring unity. It leaves decisions about removing content to tech companies’ judgment, even as their profits benefit from the most inflammatory posts.<sup>320</sup>

Arguably, the U.S. has largely taken this path, contributing to the Capitol attack on January 6, 2021.

**Path Two:** Democracy accepts its inherent vulnerability to the deliberate spread of disinformation that can erode trust, undermine common problem solving, and move citizens to embrace autocratic control. It strives to face and reduce that vulnerability through transparent public input and oversight. Public agencies, whose leaders have earned wide public respect, create tools easily accessible and reviewable by all. Citizens report information that is *both* erroneous and harmful, such as threats presenting public danger. The public entity decides whether it is to be flagged as false and harmful. Appeal is possible. Given the strong backlash against our Homeland Security’s launch of the Disinformation Governance Board—mentioned as we opened this report—such an entity should probably not be launched with power to order removal of content. Experience with “alerts,” however, could trigger public awareness, ignite discussion, as well as



heighten appreciation of why dangerous disinformation must be exposed and ultimately fact checked. Debating how a widely trusted and transparent system—perhaps learning from New Zealand’s approach—could ignite hope, a prerequisite for progress.

Both paths could include education, at all levels, that emphasizes the danger of disinformation to democracy. Even our youngest citizens can learn how to spot false information as well as grasp the importance for democracy of engaging in honest dialogue. All of us can learn about rules and tools for balancing the protection of freedom of expression and public safety.

Neither path is free from risk of misuse and erosion into autocracy, but in this report, we present evidence of promising attempts along the second pathway. We recognize that a common reservation about this option is the “slippery slope”—the fear that virtually any

step limiting speech will devolve into ever tightening restrictions.

But is this fear well-founded? Note that the highly rated democracies we've featured have

not slipped down that slope into repressive censorship, even over decades. New Zealand's Broadcast Standards Authority, for example, has been operating since 1989.<sup>321</sup>

## Igniting a Sense of Possibility

Here we've shared actions in a range of nations to meet the disinformation threat. We have offered cautionary tales of dangerous missteps while highlighting the promising practices of highly rated democracies striving to balance private and public interests.

“Fortunately, across America an historic and vibrant Democracy Movement is gaining ground. It is a ‘movement of movements.’”

Often justified by our Constitution's First Amendment right to free speech, we in the U.S. have allowed private interests propagating dangerous lies to corrupt our public dialogue. In so doing, we place private rights above a founding purpose of our nation as defined in the Preamble to our Constitution: that is, to “promote the general Welfare.”<sup>322</sup> Arguably, allowing the spread of such harmful disinformation for private gain is therefore blatantly anti-constitutional.

### ***Preamble to the Constitution of the United States:***

*“We the People of the United States, in Order to form a more perfect Union, establish Justice,*

*insure domestic Tranquility, provide for the common defense, promote the general Welfare, and secure the Blessings of liberty to ourselves and our Posterity, do ordain and establish this Constitution for the United States of America”.*<sup>323</sup>

One tool for staying abreast of related global developments is the Center for Countering Digital Hate, a U.K. organization working to educate the public about the prevalence of digital hate and disinformation and how to combat it to strengthen democracy, with offices in London and Washington D.C.<sup>324</sup> We invite you also to explore in Appendix B other leading organizations with tools for addressing this challenge. It is entitled “Movements to Combat Misinformation and Disinformation.”

Preparing *Crisis of Trust* has ignited a new sense of possibility in us. We hope our readers are also encouraged by our findings. Of course, the effectiveness of the steps we profile will depend on whether citizens come to trust their governments to use them fairly.

In the U.S., deepening trust in government—now so limited, yet so essential to meeting the crisis—requires tackling the roots of our compromised democracy. Many of us lack trust because we are aware that private wealth powerfully influences elections, and massive corporate lobbying denies citizens equal

voice—precisely what representative democracy is supposed to ensure.<sup>325</sup>

Yet, this reality is difficult for many to see because of a mental frame we've inherited: the notion of "American Exceptionalism"—the assumption that we are not only the first modern republic but the best, the long-time "leader of the western world."<sup>326</sup> This frame can blind us to what does not fit within it—such as the fact that Freedom House ranks the quality of our democracy behind more than five dozen nations.<sup>327</sup>

Can we flip this into good news?

Maybe. Just imagine how much more discouraging it would be if America truly were "the best democracy," given all we know about the power of private wealth in political life and the many ways our voting system denies equal voice. Burying the notion of American "exceptionalism" can fire up our motivation as well as open our eyes to inspiration and practical tools from stronger democracies.

The great news is that a historic democratic "movement of movements" is arising in the U.S. It includes those striving to remove the power of private, monied interests in government and to enable equal access to the ballot box, as well as the fair drawing of districts to ensure all voters have equal voice.

Want to dive in and learn more about this encouraging breakthrough?

Here's a cool tool. We invite you to explore the Small Planet Institute's co-sponsored, online guide that enables users easily to connect to democracy-reform actions in their state. You'll find it here: [www.democracymovement.us](http://www.democracymovement.us).<sup>328</sup> Our partner in creating this tool was the former Democracy Initiative with 75 member

organizations—including not only democracy-reform groups but also those ranging from civil rights to the environment. Together they represented 45 million Americans, all striving for democracy in America.<sup>329</sup>

The organizations listed below also offer great avenues for channeling our dissatisfaction, desire, and determination to be part of the solution.



We hope we've made the case that the disinformation challenge is not just an additional item on the list of worthy causes—for we can only tackle today's challenges as we as a people engage in fact-based dialogue. Whatever else is dear to our hearts as engaged citizens, let us cultivate an alertness to disinformation and an eagerness to resist and report it. May the shock of registering our true standing among the world's democracies, as

well as inspiration and practical lessons from those highly regarded, motivate and guide us.

We look forward to incorporating your thoughts on this initial edition. If we find this

report to have proven useful, we will strive to update it in future editions.

Now, we close with an insight long fueling our determination:

“Democracy is a process, not a static condition.  
It is becoming, rather than being. It can easily be lost,  
but never is fully won.  
Its essence is eternal struggle.”

William H. Hastie  
America’s First African American Federal Judge

**D**emocracy lives on honest dialogue and dies on a diet of lies. But how can democratic cultures that prize freedom of speech also protect against the lasting damage disinformation wreaks? There are few more important questions existing today. Disinformation destroys trust essential for tackling the pressing challenges of our time, from the climate crisis to political polarization to devastating economic inequities. None can be met without honest communication. In *Crisis of Trust* we share lessons gleaned from established democracies demonstrating leadership on this vital question. We hope their stories will fortify our own determination to meet the challenge as well as offer practical ideas we might adapt to our own realities.

**Frances Moore Lappé** is an American original. Dubbed “the Movement Mother” by *New York* magazine and the “Godmother of ‘plant-based’ living” by *The New York Times*, her life’s work spans breakthroughs in equitable and ecological farming and eating, all the way to rethinking democracy as a thrilling way of life instead of simply a government structure. *Gourmet* listed her as one of the 25 people, along with Thomas Jefferson and Julia Child, whose work has changed the way America eats. The Smithsonian heralded her first book, *Diet for a Small Planet* (1972), as “one of the most influential political tracts of the times.” She has been featured in *Harper’s*, *The New York Times Magazine*, and *O: The Oprah Magazine*, among others. Her media appearances range from the *Today* show to *Hardball with Chris Matthews*, *Fox and Friends*, the BBC and PBS’s *Retro Report*.



The recipient of 20 honorary degrees and the Right Livelihood Award (often called the alternative Nobel), Lappé has authored 20 books, most recently *Daring Democracy* co-authored with Adam Eichen and *It’s Not Too Late*. A sought-after public speaker, Lappé has been a visiting scholar at MIT and U.C. Berkeley. Lappé co-founded three national organizations: Oakland-based Food First (1975); Center for Living Democracy, which launched the American News Service covering solutions-oriented news that was picked up by half the nation’s largest one hundred newspapers (1991-2000); and with her daughter Anna Lappé, Cambridge, Massachusetts-based Small Planet Institute (2002).



# Appendices

## Appendix A: Resources to Combat Misinformation and Disinformation

*Dos and Don'ts of Refuting Lies and Attacks* Union of Concerned Scientists Resource Guide<sup>330</sup>

### The Dos and Don'ts of Refuting Lies and Attacks

- **DO** use individual stories to illuminate collective trends and statistics
- **DO** name what is true while emphasizing what is possible
- **DO** use news cycles and real-world incidents to advance your narrative
- **DO** meet people where they are, to lead them somewhere better
- **DO** name names, bad actors, and systemic dynamics
- **DO** speak from a position of power (i.e., the power of the people and of truth)
- **DO** develop plans and messaging that counter the opposition's
- **DO** report the disinformation to people who can regulate the content:
  - [Report to the social media platforms](#)
  - [Report to trusted messengers in the voting rights space](#)
  - [Report hate](#)
- **DO** report the disinformation to people who can counter the message through trusted relationships, such as local community organizers or influencers
- **DON'T** repeat, **replace**: instead of repeating a misperception, replace it with factual information
- **DON'T** prioritize facts and statistics over storytelling
- **DON'T** prioritize myth-busting. "Dunk-and-debunk" posts may be (temporarily) satisfying, but your audience already knows the myths, so focus on the facts; as noted above, repeating myths only serves to reinforce them.
- **DON'T** create an air of doom and gloom: you can convey your seriousness and the seriousness of an issue without sending the message that the situation is hopeless (because it's not!)
- **DON'T** be too focused on advancing your own agenda
- **DON'T** manipulate your audience through fear and anger
- **DON'T** use the passive voice (e.g., instead of "Someone was bitten by the dog," say "The dog bit someone")
- **DON'T** exaggerate opponents' power or underestimate your power
- **DON'T** use shaming content—it makes people less receptive to anything you have to say, and the people you may think "deserve" shaming usually aren't listening anyway, but prospective supporters are

"Sourced from the Union of Concerned Scientists' resource guide --[Countering Disinformation in Your Community](#)-- based on the intellectual property of communications strategist Sabrina Joy Stevens."

## Appendix B: Movements to Combat Misinformation and Disinformation

### *Organizations in the US*

- [News Literacy Project](#): A nonpartisan national education nonprofit that provides programs and resources for educators and the public to teach, learn, and share the abilities needed to be smart, active consumers of news and information and equal and engaged participants in democracy.
- [NewseumED](#): An online platform that provides free resources to cultivate the First Amendment and media literacy skills essential to civic life. For more than two decades, its goal has been to educate users about misinformation.
- [FactCheck.org by University of Pennsylvania](#): A nonpartisan, nonprofit “consumer advocate” for voters that aims to reduce the level of deception and confusion in U.S politics by monitoring the factual accuracy of what is said by major U.S political players in the form of TV ads, debates, speeches, interviews, and news releases.
- [Media Manipulation Casebook](#): A digital resource platform that maps media manipulation and disinformation campaigns for those wanting to learn more about detecting and debunking media manipulation and misinformation and disinformation.
- [PolitiFact](#): A fact-checking service that specializes in verifying/refuting the claims made by elected officials.
- [Snopes](#): An independent fact-checking organization that seeks to identify and analyze misinformation.
- [First Draft](#): A non-profit focused on protecting communities from misinformation by empowering society with the knowledge, understanding, and tools needed to resist false and misleading information.
- [Lead Stories](#): A fact-checking and debunking website that seeks to identify and fact-check recent new stories.
- [Bridge Michigan](#): A nonprofit, nonpartisan news organization that provides passionate and rooted Michigan readers with honest, fact-driven journalism on the state’s diverse people, politics, and economy.
- [EIDetector](#): U.S based Spanish-language fact-checking platform.

### *International Organizations*

#### North America

##### **Cuba**

- [el TOQUE DeFacto](#): A fact-checking website that includes a chatbot on Telegram, WhatsApp, and Facebook messenger that sends factual responses to users who submit information.

##### **Mexico**

- [Verificado](#): An independent, volunteer-run project led by several journalists from northern Mexico.
- [Escenario Tlaxcala](#): A hyperlocal digital news site located in the Mexican state of Tlaxcala. The platform fact-checks claims by politicians and government officials, as well as viral claims on social media.
- [El Sabueso](#) (“The Bloodhound”): Online fact-checking tool available through the political news website *Animal Politico*.

#### Guatemala

- [Fáctica](#): An independent fact-checking project operated by Agencia Ocotó- a group of journalists, researchers, and other communicators who collaborate with each other and media partners.
- [ConPruebas](#): Provides occasional fact-checks as part of a university-based journalism project called Plaza Pública (“Public Square”).

#### Costa Rica

- [Doble Check](#): A fact-checking project based at the Universidad de Costa Rica. It concentrates on political claims and statements made in the media.
- [No Coma Cuento](#): A fast-checking tool through the local newspaper La Nación.

#### South America

##### Panama

- [TVN’s BienChequado](#): An online fact-checking platform by journalists at the TVN network.

##### Ecuador

- [Udla Channel Chequea](#): An online fact-checker that reviews statements made by public figures and institutions.
- [El Verificador](#): An independent digital media outlet that conducts fact-checking by staff members of GK, an independent Ecuadorian media outlet.
- [Ecuador Verifica](#): A coalition of more than 30 media outlets, civil society organizations, and universities that implemented fact-checking during Ecuador's 2021 elections.
- [Ecuador Chequea](#): A nonprofit that focuses on fact-checking political statements and misinformation that spreads through social media.

##### Colombia

- [Detector de mentiras \(“Lie Detector”\)](#): An independent news site that conducts fact-checking.
- [Colombiacheck](#): A nonprofit, nonpartisan organization that brings together more than 100 journalists to fact-check articles and data.

##### Venezuela

- [Cocuyo Chequea](#): An independent journalism platform that fact-checks information.
- [EsPaja](#): An independent fact-checking organization that evaluates hoaxes/rumors and reviews the accuracy of statements made by public figures.
- [Coteja](#): A nonprofit organization that focuses on fact-checking the country’s social and political issues.

##### Peru

- [Verificador](#): A fact-checking tool accessible through the website of La Republica (Peru's leading commercial newspaper) to debunk false claims and online misinformation.



- [OjoBiónico](#): An independent digital news service that provides fact-checking services.
- [Salud con Lupa's Comprueba](#): Fact-checking by reporters at the health news site to promote factual health reporting.
- [ConvocaVerifica](#): An independent investigative journalism site that fact-checks the accuracy of political statements and challenges other forms of misinformation.

#### **Bolivia**

- [Chequea Bolivia](#): An independent fact-checking platform that focuses on debunking misinformation spread through social media platforms.
- [Bolivia Verifica](#): A fact-checking platform that seeks to verify political statements and respond to “fake news.”

#### **Brazil**

- [Boatos \(“Rumors”\)](#): An independent online platform that debunks viral content.
- [Aos Fatos](#): An independent online fact-checking platform.

#### **Argentina**

- [Chequeado](#): A nonprofit organization that fact-checks news stories.

#### **Chile**

- [FastCheckCL](#): An independent fact-checking online platform that checks claims made in mainstream media and social media.

### Africa

#### **Sierra Leone**

- [Dubwa Sierra Leone](#) (“Amplifying the Truth”): Affiliated with the nonprofit organization PTCIJ, which fact-checks and debunks digitally disseminated false information.

#### **Ghana**

- [FactCheckGhana](#): A project of the NGO Media Foundation for West Africa, which fact-checks political claims and viral rumors.
- [GhanaFact](#): An independent nonprofit that fact-checks misleading information on social media and messaging platforms. It monitors public discourse and political promises.

#### **Nigeria**

- [Dubwa Nigeria](#): Affiliated with the nonprofit organization PTCIJ, which fact-checks and debunks digitally disseminated false information.

#### **Senegal**

- [Africa Check Fr](#): A nonprofit that focuses on fact-checking claims made by francophone countries in West Africa.

#### **Gambia**

- [FactCheck Gambia](#): An independent online outlet that fact-checks political claims and online rumors.

#### **Guinea**

- [PesaCheck](#): A fact-checking initiative to debunk misleading claims and verify the financial and other statistical figures quoted by public figures across Africa.

#### **Burkina Faso**

- [PesaCheck \(Burkina Faso\)](#): A fact-checking initiative to debunk misleading claims and verify the financial and other statistical figures quoted by public figures across Africa.

#### **Niger**

- [PesaCheck \(Niger\)](#): A fact-checking initiative to debunk misleading claims and verify the financial and other statistical numbers quoted by public figures across Africa.

## Cameroon

- [PesaCheck \(Cameroon\)](#): A fact-checking initiative to debunk misleading claims and verify the financial and other statistical figures quoted by public figures across Africa.

## Namibia

- [Namibia Factcheck](#): A fact-checking project affiliated with the nonprofit, nonpartisan Institute for Public Policy Research.

## Zimbabwe

- [ZimFact](#): A project created by the Voluntary Media Council of Zimbabwe that focuses on politics and a wide range of issues. It also checks the status of elected officials' campaign promises.

## Egypt

- [Saheeh Masr](#): An independent, online fact-checking platform that review statements made by elected officials, politicians, and media personalities.
- [Matsada2sh \(“Don’t Believe”\)](#): An independent fact-checking initiative that combats misinformation published in Arabic on social media platforms. They operate on social media, with Facebook and Twitter profiles, and cover misinformation in the Arab world with a focus on Egypt.

## Asia

### Lebanon

- [Maharat News Fact-O-Meter](#): A Beirut-based nonprofit that works to promote freedom of expression and media development. Fact-O-Meter is a tool that fact-checks published reports.
- [Skeyes Center for Media and Cultural Freedom](#): The center aims to defend press and cultural freedom in the Middle East and promote the establishment of an Arab public opinion able to protect freedom of expression by disseminating information about violations of press/cultural freedoms.

### Syria

- [Verify-Sy](#): An independent online platform that verifies official and unofficial information from Syria including "alternative media" reports, public statements, and images that circulate on social media.

### Jordan

- [Fatabyyano](#): An independent organization that covers a wide range of misinformation and hoaxes throughout the Arab world.
- [Misbar](#): A fact-checking platform that provides analysis and commentary about misinformation trends.

### Israel

- [The Whistle](#): A non-partisan, non-governmental organization that fact-checks political and media discourse.

### Iraq

- [Tech 4 Peace](#): An independent, non-profit organization that focuses on misinformation that circulates on social media about the region in and around Iraq.

### Saudi Arabia

- [No Rumors](#): An independent project affiliated with “The Anti-Rumor Commission,” whose main goal is fact-checking.

### Iran

- [Fact-Nameh](#): An independent platform that reviews that accuracy of statements made by Iranian political leaders.

#### **Turkey**

- [Teyit](#): A non-governmental organization that monitors news reports and social media for suspicious information.
- [Dogruluk Payi](#): Fact-checking by the staff of İzlemedeyiz Association ("We Are on Watch"), an independent, non-governmental organization based in Istanbul. The organization focuses on reviewing the accuracy of political statements and verifying claims that circulate on social media.

#### **Azerbaijan**

- [Fakt Yoxla](#): A non-governmental fact-checking organization that focuses on dismantling misinformation pertaining to politics, law, human rights, society, and economics.

#### **Kazakhstan**

- [FactCheck.kz](#): An independent fact-checking platform founded by The MediaNet International Center for Journalism, an independent non-governmental organization.

#### **Mongolia**

- [Fact-check Mongolia](#): A fact-checking project by the Mongolian Center for Investigative Reporters, an independent, non-profit organization in the capital city of Ulaanbaatar.

#### **Pakistan**

- [Soch Fact Check](#): A platform that reviews statements about politics, science, and culture on social and traditional media.

#### **India**

- [Alt News](#): A non-governmental organization launched as a volunteer effort in India to counter "fake propagandists" who spread messages online and in the media.
- [Lokmat Fact-check](#): A Marathi language newspaper published in the Maharashtra state of India. Its website launched a fact-checking section in 2020, and has published fact-checks on viral misinformation, the COVID-19 pandemic, manipulated media, and political claims.

#### **Bangladesh**

- [BD Fact Check](#): A non-profit, non-political fact-checking organization operated by volunteers and maintained with reader donations. It focuses on claims from public figures, political parties, media outlets, social media and various organizations and institutions.

#### **Myanmar**

- [Real or Not Myanmar](#): A non-governmental platform that focuses on debunking misinformation and rumors spread online.

#### **Thailand**

- [Sure and Share Center](#): A project of the Thai News Agency that focuses on misinformation spread on social media and messaging apps.

#### **Indonesia**

- [Tirto.id Periksa Fakta](#): An independent platform that fact-checks using publicly available government and corporate information.

#### **Taiwan**

- [MyGoPen](#): An independent fact-checker that utilizes LINE, a popular messaging service, to connect with readers. It has developed a LINE messaging bot that automatically fact-checks forwarded messages.

#### **Philippines**

- [FactRakers](#): A fact-checking tool administered by students at the University of the Philippines-Diliman.

#### **Japan**

- [InFact Fact Check](#): A non-profit news agency that publishes fact-checking and investigative news reports. Based in Osaka, its contributors include journalists, lawyers, social entrepreneurs, and citizen journalists.

#### **South Korea**

- [NewsToF](#): An independent platform that fact-checks politicians and public claims, with priority given to socially influential figures.

#### **Australia**

- [Metafact](#): An independent fact-checking platform that mobilizes a network of verified academic and professional experts to answer reader questions about science, health, and medical issues.

#### **New Zealand**

- [The Whole Truth](#): A fact-checking media platform.

#### **Europe**

##### **Norway**

- [Faktisk](#): An independent, nonprofit reporting partnership that utilizes a staff of journalists, who focus on claims made in political debate, in the press and on social media.

##### **United Kingdom**

- [Logically](#): An independent platform where the public uses the Logically app to submit claims, which are automatically matched with previous fact-checks. Claims that have not been previously reviewed are checked by a team of human fact-checkers and sent back to users within several days.
- [BBC Reality Check](#): The publicly funded, non-commercial platform focuses on fact-checking news in the country.

##### **Ireland**

- [TheJournal.I.e FactCheck](#): A fact-checking platform staffed by reporters.

##### **France**

- [Les Surlingneurs](#): A collective of legal teachers and researchers whose analysis includes fact-checks of political statements and other claims that have a basis in the law.
- [Climate Feedback](#): A Paris-based non-profit organization that verifies the credibility of media reports and claims about science. Reviews are conducted by verified scientific specialists.

##### **Spain**

- [Verifact](#): An independent, non-profit journalistic project focused on counteracting misinformation in Catalonia, where political leaders of the region's independence movement remain at odds with Spain's national government in Madrid.
- [Polétika](#): An independent fact-checking organization created by a coalition of activist groups in Spain led by Oxfam Intermón and CIECODE to track political promises.

- [Maldita.es](#): A non-profit journalism organization that focuses on disinformation and transparency.
- [Newtral](#): An independent organization that fact-checks and verifies reports on its website and independently produces other media content

#### **Portugal**

- [Polígrafo](#): A commercial, for-profit fact-checker that reviews statements by public figures from across Portuguese life and society, including national and European politics, international news, the economy, sports, and pop culture.

#### **Germany**

- [ZDFH Fact Check](#): A platform that fact-checks and verifies news stories.
- [Faktenfinder](#): A platform that fact-checks and investigates widely spread claims and rumors from across the country and around the world.

#### **Switzerland**

- [Fact Check by Swissinfo.ch](#): A public media platform that fact-checks news sources.

#### **Italy**

- [Facta](#): An independent platform that focuses broadly on hoaxes, fake news, and disinformation that circulates in the media or on social networks.
- [Lavoce.info](#): A fact-checking economic and political site based in Milan with a small staff and a team of expert volunteers.

#### **Netherlands**

- [Factory](#): Fact-checking by students in the journalism school at Fontys University of Applied Sciences. The site focuses on claims by politicians, companies, non-governmental organizations, celebrities, and journalists. The students also verify photos and videos that circulate online.

#### **Denmark**

- [TjekDet](#): An independent organization that provides explanatory backgrounders, guides, and educational materials on misinformation and disinformation, and monitors scientific research on current issues.

#### **Sweden**

- [Källkritikbyran](#): An independent fact-checking platform that focuses primarily on viral claims that spread in the media and online.

#### **Finland**

- [Faktabaari](#): A volunteer-run fact-checking platform with a small volunteer staff of professional journalists. Its fact-checking emphasizes local, national, and European elections.

#### **Estonia**

- [Esti Päevalehe Faktikontroll](#): A fact-checking tool by the newspaper Eesti Päevaleht in collaboration with the non-profit Eesti Väitlusseltsi.

#### **Latvia**

- [Re:Baltica](#): A fact-checking unit of Re:Baltica, a Latvian non-profit investigative center founded in 2011.

#### **Ukraine**

- [Bez Brehni](#): An independent fact-checking platform.
- [VoxCheck](#): An independent platform that fact-checks Ukrainian politicians and relies on crowd-funding for much of its support.

- [Slovo I Dilo](#): An organization created by the People's Control System, a non-governmental organization, to track the political promises of Ukrainian officials at the national and local level.

#### **Moldova**

- [Stop Fals!](#): A fact-checking and media literacy project of the Independent Press Association.

#### **Romania**

- [Dignitas](#): An independent fact-checking project that relies on input from its audience to examine statements made by Romanian political figures.
- [Factual](#): An independent fact-checking platform administered by volunteer contributors with the goal of pushing for accountability and budget transparency.

#### **Austria**

- [Medizin Transparent](#): A platform project of Cochrane Österreich -- the Austrian branch of an international, not-for-profit network of health professionals and patient advocates that distills research findings. This fact-checking project focuses on health claims made in the media, on the internet, and in advertising.

#### **Czech Republic**

- [Demagog](#): Fact-checking platform administered by three professional journalists, who are assisted by students of Masaryk University in Brno.

#### **Poland**

- [Pravda](#): An independent platform whose fact-checking focuses on verifying claims and challenging misinformation in politics, public health, and social discourse.
- [FakeNews.pl](#): An independent organization whose fact-checking focuses on misinformation related to health, technology, public policy, entertainment and other areas of society.

#### **Slovenia**

- [Razkrinkavanje](#): A fact-checking tool of Oštro, an independent, non-profit center for investigative journalism focusing on the Adriatic region. Its journalists review statements in the media as well as claims made by prominent public figures.

#### **Croatia**

- [Faktograf](#): An independent fact-checking project that concentrates on political claims, campaign promises, digital hoaxes, and misinformation. It is operated by GONG, a Zagreb-based non-profit focused on civic participation and government accountability, with support from the National Endowment for Democracy (NED).

#### **Serbia**

- [Razkrinkavanje](#) (Serbia): A non-profit organization that monitors claims made by and in Serbian media. Also maintains lists of media and sources whose credibility is questionable.
- [Istinomer](#): A non-governmental organization that fact-checks news sources.

#### **Bosnia and Herzegovina**

- [Istinomjer.ba](#): A non-governmental organization that monitors political claims and the status of election promises.
- [Razkrinkavanje](#) (Bosnia and Herzegovina): A non-profit organization that fact-checks media content and promotes media literacy.

#### **Montenegro**

- [Razkrinkavanje](#) (Montenegro): A non-profit organization whose fact-checking focuses on claims made in the media.

#### **Kosovo**

- [Kallxo](#): An online accountability platform for Kosovo citizens funded by the United Nations Development Program.

#### **Albania**

- [Faktoje.al](#): A non-profit organization focused on verifying public statements at the national and local levels.

#### **North Macedonia**

- [Vistinomer](#): An independent fact-checking platform.

#### **Greece**

- [Ellinika Hoaxes](#): A volunteer-supported project based in Thessaloniki that covers a broad range of misinformation -- from political claims and social media hoaxes to pseudoscience and historical inaccuracies.

## Appendix C: Country Comparison Metrics

### Freedom House Scores

The Freedom House scores referenced in this report are calculated based on consideration of the following criteria. Further scoring details and breakdowns are available on Freedom House’s [website](#).<sup>331</sup>

**“Scores** – A country or territory is awarded 0 to 4 points for each of 10 political rights indicators and 15 civil liberties indicators, which take the form of questions; a score of 0 represents the smallest degree of freedom and 4 the greatest degree of freedom. The political rights questions are grouped into three subcategories: Electoral Process (3 questions), Political Pluralism and Participation (4), and Functioning of Government (3). The civil liberties questions are grouped into four subcategories: Freedom of Expression and Belief (4 questions), Associational and Organizational Rights (3), Rule of Law (4), and Personal Autonomy and Individual Rights (4). The political rights section also contains an additional discretionary question addressing forced demographic change. For the discretionary question, a score of 1 to 4 may be subtracted, as applicable (the worse the situation, the more points may be subtracted). The highest overall score that can be awarded for political rights is 40 (or a score of 4 for each of the 10 questions). The highest overall score that can be awarded for civil liberties is 60 (or a score of 4 for each of the 15 questions). The scores from the previous edition are used as a benchmark for the current year under review. A score is typically changed only if there has been a real-world development during the year that warrants a decline or improvement (e.g., a crackdown on the media, the country’s first free and fair elections), though gradual changes in conditions—in the absence of a signal event—are occasionally registered in the scores.”

Full list of Freedom House Scores can be found [here](#).

#### Scoring and status:

**KEY:** F = Free, PF = Partly Free, and NF = Not Free

Status	Political Rights score							
	0-5*	6-11	12-17	18-23	24-29	30-35	36-40	
Civil Liberties score	53-60	PF	PF	PF	F	F	F	F
	44-52	PF	PF	PF	PF	F	F	F
	35-43	PF	PF	PF	PF	PF	F	F
	26-34	NF	PF	PF	PF	PF	PF	F
	17-25	NF	NF	PF	PF	PF	PF	PF
	8-16	NF	NF	NF	PF	PF	PF	PF
	0-7	NF	NF	NF	NF	PF	PF	PF

Sourced from “Freedom in the World Research Methodology,” Freedom House

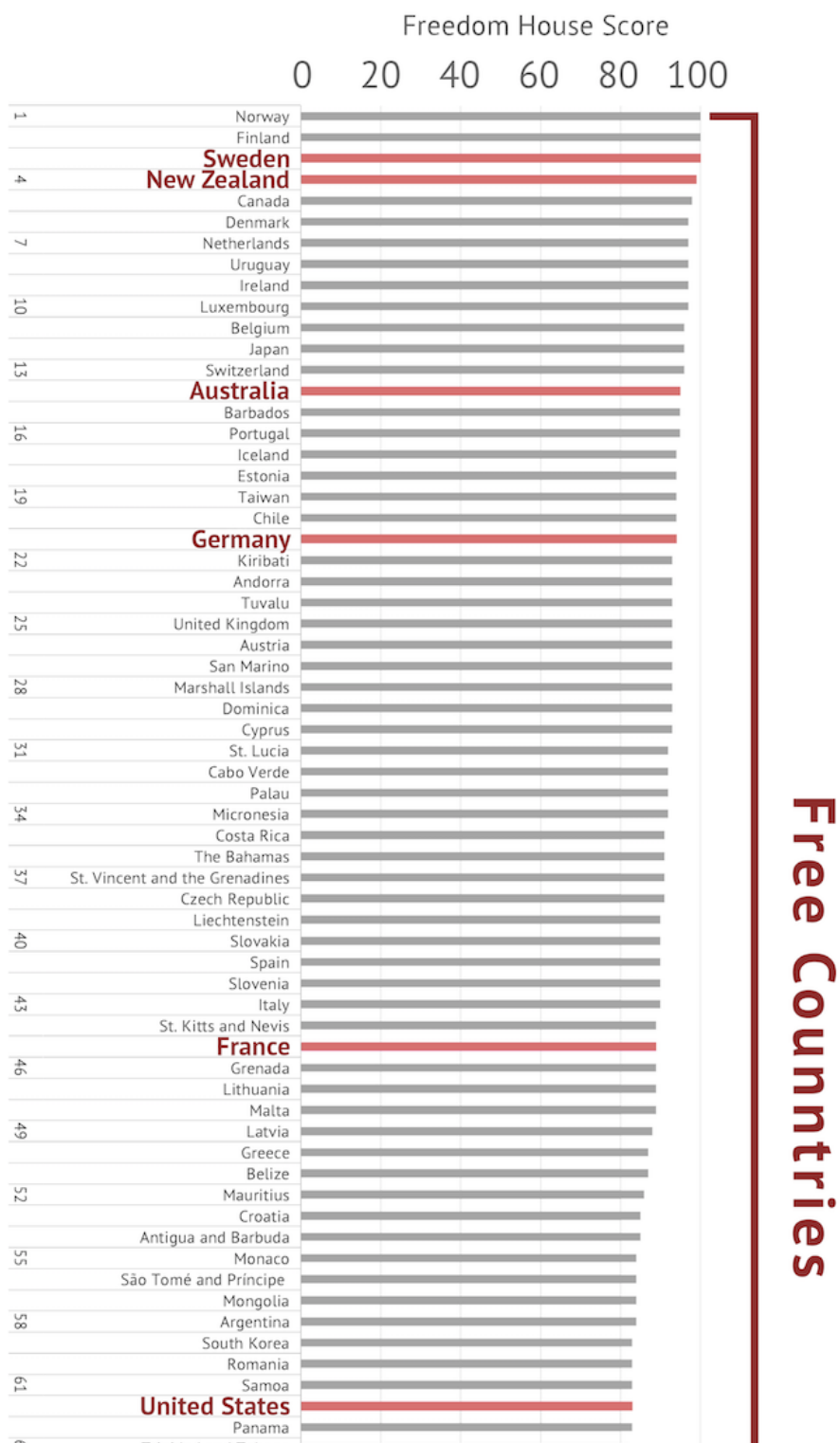


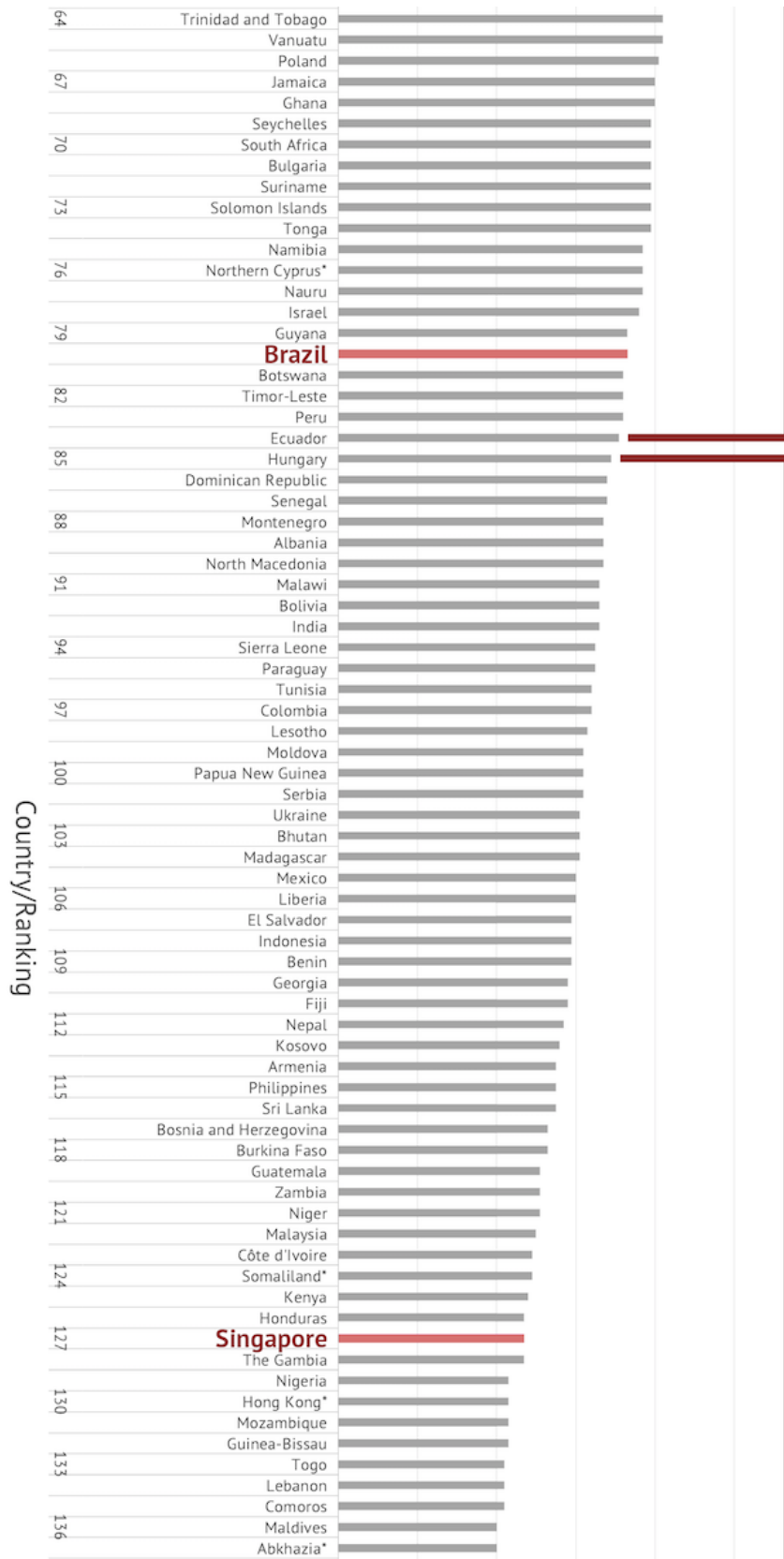
The scores of countries discussed are listed below.

COUNTRY	FREEDOM HOUSE S	RANKING
Sweden	100	T-1st
New Zealand	99	4 <sup>th</sup>
Canada	98	5 <sup>th</sup>
Belgium	96	T-11 <sup>th</sup>
Australia	95	T-14 <sup>th</sup>
Germany	94	T-17 <sup>th</sup>
Chile	94	T-17 <sup>th</sup>
France	89	T-44 <sup>th</sup>
U.S.	83	T-60 <sup>th</sup>
Brazil	73	T-80 <sup>th</sup>
Hungary	69	86 <sup>th</sup>
Singapore	47	T-126 <sup>th</sup>
Algeria	32	T-148 <sup>th</sup>
Zimbabwe	28	T-155 <sup>th</sup>
Colombia	24	163 <sup>rd</sup>

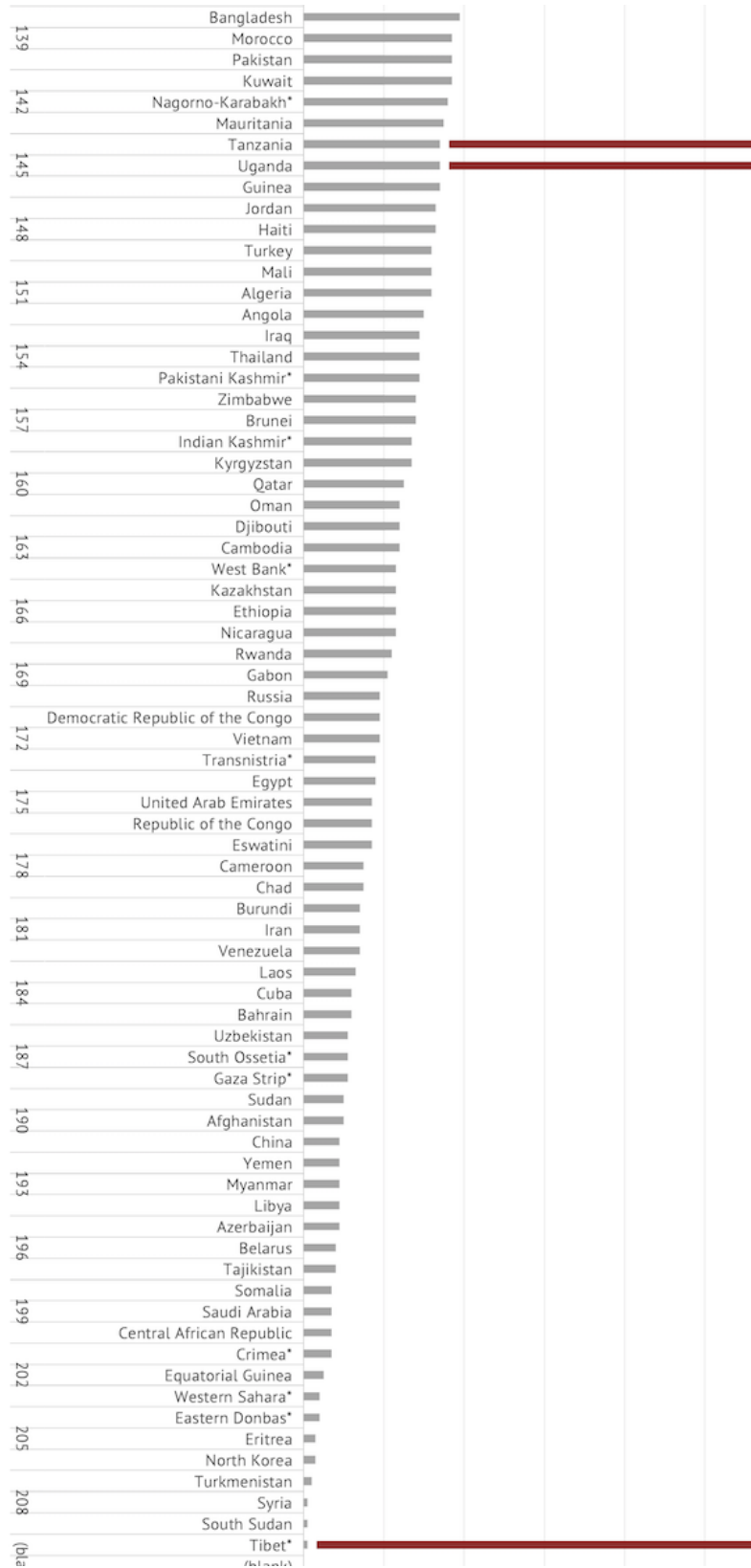
Graphs of countries ranked by Freedom House begin on the next page, which are distinguished by three categories: free countries, partially free countries, and not free countries.

# Freedom House Scores and Rankings by Country





## Partially Free Countries



## Not Free Countries

## World Freedom Index

Full World Press Freedom Index Scores can be found [here](#).<sup>332</sup>

The rankings of relevant countries are listed below, and are out of 180 countries. The rankings are also categorized as being Good, Fairly Good, Problematic, Bad, and Very Bad.

COUNTRY	RANKING	CLASSIFICATION
Sweden	3 <sup>rd</sup>	Good
New Zealand	8 <sup>th</sup>	Good
Belgium	11 <sup>th</sup>	Good
Germany	13 <sup>th</sup>	Fairly Good
Canada	14 <sup>th</sup>	Fairly Good
Australia	25 <sup>th</sup>	Fairly Good
France	34 <sup>th</sup>	Fairly Good
U.S.	44 <sup>th</sup>	Fairly Good
Hungary	92 <sup>nd</sup>	Problematic
Brazil	111 <sup>th</sup>	Bad
Zimbabwe	130 <sup>th</sup>	Bad
Algeria	146 <sup>th</sup>	Bad
Singapore	160 <sup>th</sup>	Very Bad

## Endnotes

Note: All photographs and illustrations that are not credited were downloaded from open-source websites, including pexels.com.

- <sup>1</sup> Freedom House. “New Report: The Global Decline in Democracy Has Accelerated.” Accessed September 29, 2022. <https://freedomhouse.org/article/new-report-global-decline-democracy-has-accelerated>.
- <sup>2</sup> Mallory Newall, Chris Jackson, and James Diamond, “Seven in Ten Americans Say the Country Is in Crisis, at Risk of Failing,” Ipsos, January 3, 2022, <https://www.ipsos.com/en-us/seven-ten-americans-say-country-crisis-risk-failing>.
- <sup>3</sup> “Harvard Youth Poll: Top Trends and Takeaways,” A national Poll on U.S Democracy (Kennedy School Institute of Politics: Harvard University, December 1, 2021), <https://iop.harvard.edu/youth-poll/fall-2021-harvard-youth-poll>.
- <sup>4</sup> “Public Trust in Government: 1958-2021,” Status on Public Trust in Government (Pew Research Center, June 6, 2022), <https://www.pewresearch.org/politics/2021/05/17/public-trust-in-government-1958-2021/>.
- <sup>5</sup> Jeffrey M. Jones, “Supreme Court Trust at Historic Lows,” Gallup, September 29, 2022 <https://news.gallup.com/poll/402044/supreme-court-trust-job-approval-historical-lows.aspx>
- <sup>6</sup> Megan Brenan, “Media Confidence Ratings at All Time Lows,” Gallup, July 18, 2022. <https://news.gallup.com/poll/394817/media-confidence-ratings-record-lows.aspx>
- <sup>7</sup> Dan Vallone et al., “Two Stories of Distrust in America” (More in Common, May 2021), [https://www.moreincommon.com/media/yfcbfmmmp/mic\\_two-stories-of-distrust.pdf](https://www.moreincommon.com/media/yfcbfmmmp/mic_two-stories-of-distrust.pdf).
- <sup>8</sup> Alan Feuer et al., “Jan. 6: The Story So Far,” The New York Times, June 9, 2022, sec. U.S., <https://www.nytimes.com/interactive/2022/us/politics/jan-6-timeline.html>.
- <sup>9</sup> Brian Naylor, “Read Trump’s Jan. 6 Speech, A Key Part Of Impeachment Trial,” NPR, February 10, 2021, sec. Politics, <https://www.npr.org/2021/02/10/966396848/read-trumps-jan-6-speech-a-key-part-of-impeachment-trial>.
- <sup>10</sup> “Voter Fraud Map: Election Fraud Database,” The Heritage Foundation, accessed June 22, 2022, <https://www.heritage.org/voterfraud>; This presentation seems to suggest a troubling amount of voter fraud. However, spread over the time period covered, it is insignificant. See our analysis here: Frances Moore Lappé and Richard Rowe, “The Real Fraud: Republicans’ Voter-Fraud Scare,” Common Dreams, June 6, 2021. <https://www.commondreams.org/views/2021/06/26/real-fraud-republicans-voter-fraud-scare>.
- <sup>11</sup> Lois Beckett and Julia Wong, “The Misinformation Media Machine Amplifying Trump’s Election Lies | US Elections 2020,” Guardian, November 10, 2020, <https://www.theguardian.com/us-news/2020/nov/10/donald-trump-us-election-misinformation-media>.
- <sup>12</sup> “The American Public Views the Spread of Misinformation as a Major Problem,” AP-NORC(blog), accessed August 15, 2022, <https://apnorc.org/projects/the-american-public-views-the-spread-of-misinformation-as-a-major-problem/>.
- <sup>13</sup> “Most Republicans Still Falsely Believe Trump’s Stolen Election Claims. Here Are Some Reasons Why.,” Poynter(blog), June 16, 2022, <https://www.poynter.org/fact-checking/2022/70-percent-republicans-falsely-believe-stolen-election-trump/>.
- <sup>14</sup> Public Religion Research Institute, Accessed September 30, 2022. <https://www.ppri.org/press-release/new-ppri-report-reveals-nearly-one-in-five-americans-and-one-in-four-republicans-still-believe-in-qanon-conspiracy-theories/>; Washington Post. “Daughter Says QAnon Conspiracy Theory Fueled Father’s Deadly Rampage.” Accessed September 30, 2022. <https://www.washingtonpost.com/nation/2022/09/12/igor-lanis-murder/>.
- <sup>15</sup> Robert Kolker, “The Long Shadow of Sandy Hook,” The New York Times, March 8, 2022, sec. Books, <https://www.nytimes.com/2022/03/08/books/review/sandy-hook-elizabeth-williamson.html>.
- <sup>16</sup> “Jury Orders Alex Jones to Pay \$45.2 Million in Sandy Hook Case -The New York Times.” Accessed October 3, 2022. <https://www.nytimes.com/2022/08/05/us/politics/alex-jones-verdict.html>.
- <sup>17</sup> Ibid.
- <sup>18</sup> Ali Nouri and Amir Bagherpour, “COVID Misinformation Is Killing People,” Scientific American, October 11, 2022, <https://www.scientificamerican.com/article/covid-misinformation-is-killing-people1/>.
- <sup>19</sup> Cato Institute. “New Research on Illegal Immigration and Crime,” October 13, 2020. <https://www.cato.org/blog/new-research-illegal-immigration-crime-0>.

- 
- <sup>20</sup> Christian Science Monitor. “Why Do Americans Think More Immigration Means More Crime? (Audio),” August 17, 2020. [https://www.csmonitor.com/Podcasts/Perception-Gaps/Season-2-Locked-Up/perception\\_gaps\\_s2\\_ep\\_03](https://www.csmonitor.com/Podcasts/Perception-Gaps/Season-2-Locked-Up/perception_gaps_s2_ep_03).
- <sup>21</sup> Garen J. Wintemute et al., “Views of American Democracy and Society and Support for Political Violence: First Report from a Nationwide Population-Representative Survey | MedRxiv,” MedRxiv, July 19, 2022, <https://www.medrxiv.org/content/10.1101/2022.07.15.22277693v1>; Katherine Schaeffer, “On July Fourth, How Americans See Their Country and Their Democracy,” Pew Research Center(blog), accessed August 15, 2022, <https://www.pewresearch.org/fact-tank/2022/06/30/how-americans-see-their-country-and-their-democracy/>.
- <sup>22</sup> “Many Americans Say U.S. Is One of the Greatest in the World,” Pew Research, June 30, 2022. <https://www.pewresearch.org/fact-tank/2022/06/30/how-americans-see-their-country-and-their-democracy/>
- <sup>23</sup> “Broadcasting False Information,” Federal Communications Commission, May 4, 2011, <https://www.fcc.gov/consumers/guides/broadcasting-false-information>.
- <sup>24</sup> Charles E. Grassley and Josh Hawley, “U.S. Senate,” June 7, 2022.; Taylor Lorenz, “How the Biden Administration Let Right-Wing Attacks Derail Its Disinformation Efforts,” Washington Post, May 18, 2022, <https://www.washingtonpost.com/technology/2022/05/18/disinformation-board-dhs-nina-jankowicz/>
- <sup>25</sup> “Fact Sheet: DHS Internal Working Group Protects Free Speech Other Fundamental Rights When Addressing Disinformation That Threatens the Security of the U.S. | Homeland Security,” Department of Homeland Security
- <sup>26</sup> Ibid.
- <sup>27</sup> Ibid.; Taylor Lorenz, “How the Biden Administration Let Right-Wing Attacks Derail Its Disinformation Efforts,” Washington Post, May 18, 2022, <https://www.washingtonpost.com/technology/2022/05/18/disinformation-board-dhs-nina-jankowicz/>.
- <sup>28</sup> Mitchell, Amy, and Mason Walker. “More Americans Now Say Government Should Take Steps to Restrict False Information Online than in 2018.” Pew Research Center(blog). Accessed October 3, 2022. <https://www.pewresearch.org/fact-tank/2021/08/18/more-americans-now-say-government-should-take-steps-to-restrict-false-information-online-than-in-2018/>.
- <sup>29</sup> Adam Levy, “The Big 6 Media Companies,” The Motley Fool, June 10, 2022, <https://www.fool.com/investing/stock-market/market-sectors/communication/media-stocks/big-6/>
- <sup>30</sup> FaizSiddiqui et al., “Elon Musk Takes over Twitter, Will Form a ‘Content Moderation Council,”” The Washington Post, October 28, 2022, <https://www.washingtonpost.com/technology/2022/10/28/elon-musk-buys-twitter/>.
- <sup>31</sup> Robert George, “Elon Musk Sabotages His Defense of Free Speech,” Washington Post, November 5, 2022, [https://www.washingtonpost.com/business/elon-musk-sabotages-his-defense-of-free-speech/2022/11/04/cb9e09b6-5c49-11ed-bc40-b5a130f95ee7\\_story.html](https://www.washingtonpost.com/business/elon-musk-sabotages-his-defense-of-free-speech/2022/11/04/cb9e09b6-5c49-11ed-bc40-b5a130f95ee7_story.html).
- <sup>32</sup> “Twitter Saw an ‘Immediate, Visible and Measurable Spike’ in Hate Speech after Elon Musk Takeover, Researchers Find,” CBS News, November 2, 2022, <https://www.cbsnews.com/news/elon-musk-twitter-caused-measurable-spike-hate-speech-study/>.
- <sup>33</sup> Tiffany Hsu, “Worries Grow That TikTok Is New Home for Manipulated Video and Photos,” The New York Times, November 4, 2022, sec. Technology, <https://www.nytimes.com/2022/11/04/technology/tiktok-deepfakes-disinformation.html>.
- <sup>34</sup> Ibid.
- <sup>35</sup> John Light, “How Media Consolidation Threatens Democracy: 857 Channels (and Nothing On),” BillMoyers.Com(blog), May 12, 2017, <https://billmoyers.com/story/media-consolidation-should-anyone-care/>; Adam Levy, “The Big 6 Media Companies,” The Motley Fool, June 10, 2022, <https://www.fool.com/investing/stock-market/market-sectors/communication/media-stocks/big-6/>.
- <sup>36</sup> “Tech Companies Spent Almost \$70 Million Lobbying Washington in 2021 as Congress Sought to Rein in Their Power,” Washington Post, accessed July 11, 2022, <https://www.washingtonpost.com/technology/2022/01/21/tech-lobbying-in-washington/>.
- <sup>37</sup> “Top Spenders,” OpenSecrets, accessed September 13, 2022, <https://www.opensecrets.org/federal-lobbying/top-spenders>.
- <sup>38</sup> Ibid.
- <sup>39</sup> Zeynep Tufekci, “We Pay and Ugly Price for Ads on ‘Free Twitter,”” New York Times, November 5, 2022, <https://www.nytimes.com/2022/11/04/opinion/elon-musk-twitter-free.html>
- <sup>40</sup> Julia Boorstin, “Facebook Tackles Fake News,” CNBC, December 15, 2016, <https://www.cnbc.com/2016/12/15/facebook-tackles-fake-news.html>.
- <sup>41</sup> Fabio Petroni, “How AI Could Help Make Wikipedia Entries More Accurate,” Tech at Meta, July 11, 2022, <https://tech.fb.com/artificial-intelligence/2022/07/how-ai-could-help-make-wikipedia-entries-more-accurate/>.

- 
- <sup>42</sup> Nina Raemont, “Meta AI Tool ‘Sphere’ Could Help Curb Fake News,” CNET, July 11, 2022, <https://www.cnet.com/tech/services-and-software/meta-unveils-ai-tool-sphere-that-aims-to-curb-fake-news/>.
- <sup>43</sup> Seth Smalley, “Meta Won’t Comment on Its Plans to Abandon CrowdTangle,” Poynter(blog), August 18, 2022, <https://www.poynter.org/reporting-editing/2022/meta-wont-comment-on-its-plans-to-abandon-crowdtangle/>.
- <sup>44</sup> Ibid.
- <sup>45</sup> “Sherman Anti-Trust Act (1890),” National Archives, September 9, 2021, <https://www.archives.gov/milestone-documents/sherman-anti-trust-act>.
- <sup>46</sup> Mary Pilon, “Monopoly’s Inventor: The Progressive Who Didn’t Pass ‘Go,’” The New York Times, February 13, 2015, sec. Business, <https://www.nytimes.com/2015/02/15/business/behind-monopoly-an-inventor-who-didnt-pass-go.html>
- <sup>47</sup> Domenica Ghanem, “Report: Billionaire Bonanza 2017,” Institute for Policy Studies, November 8, 2017, <https://ips-dc.org/report-billionaire-bonanza-2017/>.
- <sup>48</sup> Op cit., Mary Pilon, “Monopoly’s Inventor: The Progressive Who Didn’t Pass ‘Go,’” The New York Times, February 13, 2015, sec. Business, <https://www.nytimes.com/2015/02/15/business/behind-monopoly-an-inventor-who-didnt-pass-go.html>.
- <sup>49</sup> Wealth Inequality by Country 2022, World Population Review. <https://worldpopulationreview.com/country-rankings/wealth-inequality-by-country>
- <sup>50</sup> “Gini Index | Data,” accessed June 21, 2022. [https://data.worldbank.org/indicator/SI.POV.GINI?most\\_recent\\_value\\_desc=false](https://data.worldbank.org/indicator/SI.POV.GINI?most_recent_value_desc=false); Gina Dimuro, “Monopoly Was Invented To Protest The One Percent — But We All Played It Like Them Instead,” All That’s Interesting, July 10, 2018, <https://allthatsinteresting.com/elizabeth-magie-inventor-of-monopoly>.
- <sup>51</sup> Thom Hartmann, The Hidden History of Monopolies, Berrett Koehler Publishers, 2020.
- <sup>52</sup> Rakesh Kochhar and Stella Sechopoulos, “How the American Middle Class Has Changed in the Past Five Decades,” Pew Research Center( blog), accessed September 14, 2022, <https://www.pewresearch.org/fact-tank/2022/04/20/how-the-american-middle-class-has-changed-in-the-past-five-decades/>.
- <sup>53</sup> <https://rollcall.com/2022/07/21/republicans-plot-immigration-moves-if-they-control-house/>
- <sup>54</sup> “Gini Index | Data,” accessed June 21, 2022. [https://data.worldbank.org/indicator/SI.POV.GINI?most\\_recent\\_value\\_desc=false](https://data.worldbank.org/indicator/SI.POV.GINI?most_recent_value_desc=false);
- <sup>55</sup> Stuart A. Thompson, “4 Falsehoods Russians Are Told About the War,” New York Times, March 10, 2022, sec. Technology, <https://www.nytimes.com/2022/03/10/technology/disinformation-russia-ukraine.html>.
- <sup>56</sup> Countries and Territories,” Freedom House, accessed July 12, 2022, <https://freedomhouse.org/countries/freedom-world/scores>
- <sup>57</sup> Ibid.
- <sup>58</sup> “2020 Election to Cost \$14 Billion, Blowing Away Spending Records,” OpenSecrets News, October 28, 2020, <https://www.opensecrets.org/news/2020/10/cost-of-2020-election-14billion-update/>; “Most Expensive Ever: 2020 Election Cost \$14.4 Billion,” OpenSecrets News, February 11, 2021, <https://www.opensecrets.org/news/2021/02/2020-cycle-cost-14p4-billion-doubling-16/>.
- <sup>59</sup> Tim Lau, “Citizens United Explained,” Brennan Center for Justice, December 12, 2019, <https://www.brennancenter.org/our-work/research-reports/citizens-united-explained>.
- <sup>60</sup> “Financing of Political Structures in EU Member States” (European Parliament, June 2021), [https://www.europarl.europa.eu/RegData/etudes/STUD/2021/694836/IPOL\\_STU\(2021\)694836\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2021/694836/IPOL_STU(2021)694836_EN.pdf).
- <sup>61</sup> Ibid.
- <sup>62</sup> “German Election: Party and Campaign Financing,” DW, September 8, 2021, <https://www.dw.com/en/german-election-party-and-campaign-financing/a-58807353>.
- <sup>63</sup> “French Elections: Who Finances the Candidates?,” DW, accessed August 29, 2022, <https://learngerman.dw.com/en/french-elections-who-finances-the-candidates/a-38704682>.
- <sup>64</sup> Sara Brown, “MIT Sloan Research about Social Media, Misinformation, and Elections,” MIT Sloan, October 5, 2020, <https://mitsloan.mit.edu/ideas-made-to-matter/mit-sloan-research-about-social-media-misinformation-and-elections>.
- <sup>65</sup> Soroush Vosoughi, Deb Roy, and Sinan Aral, “The Spread of True and False News Online,” Science359, no. 6380 (March 9, 2018): 1146–51, <https://doi.org/10.1126/science.aap9559>.
- <sup>66</sup> “Roth v. U.S., 354 U.S. 476 (1957),” Justia Law, April 22, 1957, <https://supreme.justia.com/cases/federal/us/354/476/>.



- 
- <sup>67</sup> David L. Hudson, “Marketplace of Ideas,” June 2017, <https://www.mtsu.edu/first-amendment/article/999/marketplace-of-ideas>.
- <sup>68</sup> “In the Matter of Editorializing by Broadcast Licensees” (Federal Communications Commission, 1949).
- <sup>69</sup> Daniel C. Kramer, “Red Lion Broadcasting Co. v. Federal Communications Commission,” accessed June 21, 2022, <https://www.mtsu.edu/first-amendment/article/117/red-lion-broadcasting-co-v-federal-communications-commission>.
- <sup>70</sup> Matt Stefon, “Fairness Doctrine,” Britannica, accessed June 21, 2022, <https://www.britannica.com/topic/Fairness-Doctrine>.
- <sup>71</sup> Ibid.
- <sup>72</sup> Daniel C. Kramer, “Red Lion Broadcasting Co. v. Federal Communications Commission,” accessed June 21, 2022, <https://www.mtsu.edu/first-amendment/article/117/red-lion-broadcasting-co-v-federal-communications-commission>.
- <sup>73</sup> Matt Stefon, “Fairness Doctrine,” Britannica, accessed June 21, 2022, <https://www.britannica.com/topic/Fairness-Doctrine>.
- <sup>74</sup> Brad Friedman, “Obama FCC Kills ‘Fairness Doctrine’ Dead, as Requested by Congressional Republicans,” Truthout, August 23, 2011, <https://truthout.org/articles/obama-fcc-kills-fairness-doctrine-dead-as-requested-by-congressional-republicans/>.
- <sup>75</sup> Oliver Darcy Business CNN, “Rush Limbaugh, Conservative Media Icon, Dead at 70 Following Battle with Cancer,” CNN, accessed June 21, 2022, <https://www.cnn.com/2021/02/17/media/rush-limbaugh-obituary/index.html>; Alvin Chang, “Sinclair’s Takeover of Local News, in One Striking Map,” Vox, April 6, 2018, <https://www.vox.com/2018/4/6/17202824/sinclair-tribune-map>; “Sinclair Broadcast Revenue 2010-2022,” Macrotrends, accessed June 21, 2022, <https://www.macrotrends.net/stocks/charts/SBGI/sinclair-broadcast/revenue>.
- <sup>76</sup> Clay Travis and Sexton, “What to Expect When Rush Limbaugh’s Replacements Debut,” Deseret News, June 20, 2021, <https://www.deseret.com/2021/6/19/22535194/rush-limbaughs-replacements-start-next-week-what-can-their-listeners-expect-clay-travis-buck-sexton>.
- <sup>77</sup> Elizabeth Grieco, “Americans’ Main Sources for Political News Vary by Party and Age,” Pew Research Center(blog), April 1, 2020, <https://www.pewresearch.org/fact-tank/2020/04/01/americans-main-sources-for-political-news-vary-by-party-and-age/>.
- <sup>78</sup> Elisa Shearer, “More than Eight-in-Ten Americans Get News from Digital Devices,” Pew Research Center(blog), accessed June 21, 2022, <https://www.pewresearch.org/fact-tank/2021/01/12/more-than-eight-in-ten-americans-get-news-from-digital-devices/>; Elizabeth Grieco, “Americans’ Main Sources for Political News Vary by Party and Age,” Pew Research Center(blog), accessed July 1, 2022, <https://www.pewresearch.org/fact-tank/2020/04/01/americans-main-sources-for-political-news-vary-by-party-and-age/>.
- <sup>79</sup> Amy Mitchell et. al., “Political Polarization & Media Habits,” Pew Research Center’s Journalism Project (blog), October 21, 2014. <https://www.pewresearch.org/journalism/2014/10/21/political-polarization-media-habits/>.
- <sup>80</sup> “Roth v. U.S., 354 U.S. 476 (1957),” Justia Law, April 22, 1957, <https://supreme.justia.com/cases/federal/us/354/476/>.
- <sup>81</sup> Lauren Feiner, “Obama Calls for Tech Regulation to Combat Disinformation on Social Media,” CNBC, April 21, 2022, <https://www.cnbc.com/2022/04/21/obama-calls-for-tech-regulation-to-combat-disinformation-on-internet.html>.
- <sup>82</sup> David McCabe, “Appeals Court Revives Texas Law Targeting Social Media Companies,” New York Times, May 12, 2022, sec. Technology, <https://www.nytimes.com/2022/05/12/technology/texas-social-media-law-political-speech.html>.
- <sup>83</sup> Rebecca Klar, “Obama Points Finger at Tech Companies for Disinformation in Major Speech,” Text, The Hill(blog), April 21, 2022, <https://thehill.com/policy/technology/3382803-obama-points-finger-at-tech-companies-for-disinformation-in-major-speech/>.
- <sup>84</sup> Ibid.
- <sup>85</sup> Lessig, “On the Issues with ‘Free Speech,’” Medium, May 15, 2021, <https://medium.lesig.org/on-the-issues-with-free-speech-e4308dc0ee7d>.
- <sup>86</sup> Direct communication with Professor Lessig.
- <sup>87</sup> Lewis Sanders, “Disinformation Sites Generate over \$200 Million: Study,” DW.COM, September 22, 2019, <https://www.dw.com/en/disinformation-sites-generate-over-200-million-study/a-50537297>; “The Global Disinformation Index,” accessed July 25, 2022, <https://www.disinformationindex.org/>.

- 
- <sup>88</sup> “Our History,” Freedom House, accessed July 12, 2022, <https://freedomhouse.org/about-us/our-history>;  
“Countries and Territories,” Freedom House, accessed July 12, 2022, <https://freedomhouse.org/countries/freedom-world/scores>.
- <sup>89</sup> Alizada, Nazifa, Vanessa Boese, Martin Lundstedt, Kelly Morrison, Natalia Natsika, Yuko Sato, Hugo Tai, and Staffan Lindberg. “Democracy Report 2022: Autocratization Changing Nature?” V-Dem, March 2022. [https://v-dem.net/media/publications/dr\\_2022.pdf](https://v-dem.net/media/publications/dr_2022.pdf).
- <sup>90</sup> Sarah Repucci and Amy Slipowitz, “The Global Expansion of Authoritarian Rule,” Freedom House, accessed June 22, 2022, <https://freedomhouse.org/report/freedom-world/2022/global-expansion-authoritarian-rule>.
- <sup>91</sup> “Misinformation Definition & Meaning,” Merriam-Webster, accessed June 22, 2022, <https://www.merriam-webster.com/dictionary/misinformation> ; “Disinformation Definition & Meaning,” Merriam-Webster, accessed June 22, 2022, <https://www.merriam-webster.com/dictionary/disinformation>.
- <sup>92</sup> Scott Shane, “These Are the Ads Russia Bought on Facebook in 2016,” New York Times, November 1, 2017, sec. U.S., <https://www.nytimes.com/2017/11/01/us/politics/russia-2016-election-facebook.html>.
- <sup>93</sup> Scott Shane, “These Are the Ads Russia Bought on Facebook in 2016,” New York Times, November 1, 2017, sec. U.S., <https://www.nytimes.com/2017/11/01/us/politics/russia-2016-election-facebook.html>.
- <sup>94</sup> Josef Trappel and Tales Tomaz, “Success and Failure in News Media Performance” (Euromedia Research Group, 2022), <https://www.diva-portal.org/smash/get/diva2:1641194/FULLTEXT02.pdf>.
- <sup>95</sup> Fatma Khaled, “Facebook and Amazon Are Now the Top Lobbying Spenders in the US,” Business Insider, March 25, 2021, <https://www.businessinsider.com/facebook-and-amazon-are-countrys-top-lobbying-spenders-report-2021-3>.
- <sup>96</sup> Maldenberg, Emanuel. “How Do We ‘Choose’ Our News?” Psychology Today, August 1, 2017. <https://www.psychologytoday.com/us/blog/belief-and-the-brain/201708/how-do-we-choose-our-news>.
- <sup>97</sup> Lewis, Paul, and Paul Hilder. “Leaked: Cambridge Analytica’s Blueprint for Trump’s Victory.” The Guardian, March 23, 2018. <https://www.theguardian.com/uk-news/2018/mar/23/leaked-cambridge-analyticas-blueprint-for-trump-victory>.
- <sup>98</sup> The Week. “Brexit: The Pros and Cons of Leaving the EU,” February 3, 2022. <https://www.theweek.co.uk/brexit-0>.
- <sup>99</sup> “It’s the Slogan, Stupid: The Brexit Referendum,” University of Birmingham, accessed June 22, 2022, <https://www.birmingham.ac.uk/research/perspective/eu-ref-haughton.aspx>.
- <sup>100</sup> Amer, Karim, and Jehane Noujaim. The Great Hack. Netflix, Documentary. Netflix, 2019. <https://www.netflix.com/title/80117542>.
- <sup>101</sup> Kathleen Hall Jamieson, Cyberwar: How Russian Hackers and Trolls Helped Elect a President: What We Don’t, Can’t, and Do Know (Oxford, New York: Oxford University Press, 2018), <https://global.oup.com/academic/product/cyberwar-9780190915810?cc=us&lang=en&>.
- <sup>102</sup> Merrill, Jeremy, and Olivia Goldhill. “These Are the Political Ads Cambridge Analytica Designed for You.” Quartz, January 10, 2020. <https://qz.com/1782348/cambridge-analytica-used-these-5-political-ads-to-target-voters/>.
- <sup>103</sup> Caulfield, Michael. “SIFT: Stop, Investigate, Find, Trace: What Is SIFT?” Wayne State University Library System Research Guides(blog), March 11, 2021. <https://guides.lib.wayne.edu/sift>.
- <sup>104</sup> Brainy Quote, [https://www.brainyquote.com/quotes/paul\\_wellstone\\_557634](https://www.brainyquote.com/quotes/paul_wellstone_557634).
- <sup>105</sup> Diogo Tulio dos Santos, “Brazil, Democracy, and the ‘Fake News’ Bill,” Global Americans(blog), January 4, 2021, <https://theglobalamericans.org/2021/01/brazil-democracy-and-the-fake-news-bill/>.
- <sup>106</sup> Ibid.
- <sup>107</sup> Veridiana Alimonti, “Brazil’s Fake News Bill: Perils and Flaws of Expanding Existent Data Retention Obligations,” Electronic Frontier Foundation, November 9, 2021, <https://www.eff.org/deeplinks/2021/11/brazils-fake-news-bill-perils-and-flaws-expanding-existent-data-retention>; Seth Smalley, “Brazil’s Fact-checkers Air Concerns Over So-called ‘Fake News’ Bill,” April 14, 2022, Poynter, <https://www.poynter.org/reporting-editing/2022/brazils-fact-checkers-air-concerns-over-fake-news-bill/>; <https://www.eff.org/deeplinks/2020/06/5-serious-flaws-new-brazilian-fake-news-bill-will-undermine-human-rights>.
- <sup>108</sup> Diogo Tulio dos Santos, “Brazil, Democracy, and the ‘Fake News’ Bill,” Global Americans(blog), January 4, 2021, <https://theglobalamericans.org/2021/01/brazil-democracy-and-the-fake-news-bill/>.
- <sup>109</sup> “Traceability Under Brazil’s Proposed Fake News Law Would Undermine Users’ Privacy and Freedom of Expression,” Center for Democracy and Technology(blog), accessed July 1, 2022, <https://cdt.org/insights/traceability-under-brazils-proposed-fake-news-law-would-undermine-users-privacy-and-freedom-of-expression/>.
- <sup>110</sup> Ibid.

---

<sup>111</sup> Ibid.

<sup>112</sup> Ibid.

<sup>113</sup> Nina Jankowicz and Shannon Pierson, “Freedom and Fakes: A Comparative Exploration of Countering Disinformation and Protecting Free Expression” (Wilson Center, December 2020), <https://www.wilsoncenter.org/sites/default/files/media/uploads/documents/WWICS%20STIP%20Freedom%20and%20Fakes%20A%20Comparative%20Exploration%20of%20Countering%20Disinformation%20and%20Protecting%20Free%20Expression.pdf>.

<sup>114</sup> Jack Nicas, “Brazil’s President Bans Social Networks From Removing Some Posts,” New York Times, September 9, 2021, sec. World, <https://www.nytimes.com/2021/09/09/world/americas/bolsonaro-social-networks.html>.

<sup>115</sup> “Brazil: Bolsonaro Blocks Critics on Social Media,” Human Rights Watch(blog), August 19, 2021, <https://www.hrw.org/news/2021/08/19/brazil-bolsonaro-blocks-critics-social-media>.

<sup>116</sup> “Brazil: Freedom in the World 2022 Country Report,” Freedom House, 2022, <https://freedomhouse.org/country/brazil/freedom-world/2022>.

<sup>117</sup> “Attacks on Journalists Explode in Brazil in 2020 and Most of Them Come from President Bolsonaro,” LatAm Journalism Review by the Knight Center, January 27, 2021, <https://latamjournalismreview.org/articles/attacks-journalists-brazil-2020-bolsonaro/>.

<sup>118</sup> FENAJ, “Violência contra jornalistas cresce 105,77% em 2020, com Jair Bolsonaro liderando ataques,” FENAJ(blog), January 26, 2021, <https://fenaj.org.br/violencia-contra-jornalistas-cresce-10577-em-2020-com-jair-bolsonaro-liderando-ataques/>.

<sup>119</sup> Marianna Tzabiras, “RSF Tallied 580 Attacks against Media in Brazil in 2020,” IFEX, January 27, 2021, <https://ifex.org/rsf-tallied-580-attacks-against-media-in-brazil-in-2020/>.

<sup>120</sup> Jack Nicas, “Brazil’s President Bans Social Networks From Removing Some Posts,” The New York Times, September 9, 2021, sec. World, <https://www.nytimes.com/2021/09/09/world/americas/bolsonaro-social-networks.html>.

<sup>121</sup> Ibid.

<sup>122</sup> Ibid.

<sup>123</sup> Ibid.

<sup>124</sup> Steven Grattan, “Poll Shows Brazil’s Lula Maintains Strong Lead in Presidential Race,” Reuters, June 1, 2022, sec. Americas, <https://www.reuters.com/world/americas/poll-shows-brazils-lula-maintains-strong-lead-presidential-race-2022-06-08/>; Jack Nicas, “Brazil’s President Bans Social Networks From Removing Some Posts,” New York Times, September 9, 2021, sec. World, <https://www.nytimes.com/2021/09/09/world/americas/bolsonaro-social-networks.html>.

<sup>125</sup> Jack Nicas, “Bolsonaro Is Silent After Brazil Election Defeat,” New York Times, October 31, 2022, <https://www.nytimes.com/2022/10/31/world/americas/brazil-election-results-bolsonaro-lula.html>.

<sup>126</sup> “Countries and Territories,” Freedom House, accessed October 24, 2022, <https://freedomhouse.org/countries/freedom-world/scores>.

<sup>127</sup> Ibid.

<sup>128</sup> Ibid.

<sup>129</sup> “Protection from Online Falsehoods and Manipulation Act 2019,” Singapore Statutes Online, 2019, <https://sso.agc.gov.sg:5443/Act/POFMA2019>.

<sup>130</sup> “Singapore Fake News Laws: Guide to POFMA (Protection from Online Falsehoods and Manipulation Act),” SingaporeLegalAdvice.com, April 25, 2022, <https://singaporelegaladvice.com/law-articles/singapore-fake-news-protection-online-falsehoods-manipulation/>.

<sup>131</sup> “Singapore Fake News Laws: Guide to POFMA (Protection from Online Falsehoods and Manipulation Act),” SingaporeLegalAdvice.com, April 25, 2022, <https://singaporelegaladvice.com/law-articles/singapore-fake-news-protection-online-falsehoods-manipulation/>.

<sup>132</sup> Ibid.

<sup>133</sup> Ibid.

<sup>134</sup> Paul Meyer, “Singapore’s First Election Under the Fake News Law,” The Diplomat, July 7, 2020, <https://thediplomat.com/2020/07/singapores-first-election-under-the-fake-news-law/>.

<sup>135</sup> Ibid.

<sup>136</sup> John Geddie, “Singapore’s Fake News Law Trips up Opposition as Election Looms,” Reuters, July 6, 2020, sec. everythingNews, <https://www.reuters.com/article/us-singapore-election-fakenews-idUSKBN2470NW>.

- <sup>137</sup> Goh Yan Han, "Press Freedom Ranking Based on Country's Media Laws, Not Quality: News Veteran Patrick Daniel," Straits Times, February 17, 2022, <https://www.straitstimes.com/singapore/press-freedom-ranking-based-on-countrys-media-laws-not-quality-news-veteran-patrick-daniel>.
- <sup>138</sup> "Countries and Territories," Freedom House, accessed August 24, 2022, <https://freedomhouse.org/countries/freedom-world/scores>.
- <sup>139</sup> "Singapore Launches Public Consultation on Online Harms Codes," Reed Smith, July 22, 2022, <https://www.reedsmith.com/en/perspectives/2022/07/singapore-launches-public-consultation-on-online-harms-codes>.
- <sup>140</sup> The Associated Press, "Ex-Rebel Sworn in as Colombia's President in Historic Shift," NPR, August 7, 2022, sec. Latin America, <https://www.npr.org/2022/08/07/1116215977/ex-rebel-sworn-in-as-colombias-president-in-historic-shift>; "Chile Swears in New President Gabriel Boric in 'Historic Shift,'" March 11, 2022, <https://www.aljazeera.com/news/2022/3/11/chile-swears-in-new-president-gabriel-boric-historic-shift>.
- <sup>141</sup> Michael Rueda, "Gustavo Petro Taking Oath as Colombia President," Time, August 7, 2022, <https://time.com/6204259/gustavo-petro-colombia-president/>; Julie Turkewitz, Pascale Bonnefoy, and John Bartlett, "Gabriel Boric: From Shaggy-Haired Activist to Chilean President," The New York Times, December 21, 2021, sec. World, <https://www.nytimes.com/2021/12/21/world/americas/chile-boric.html>.
- <sup>142</sup> Samantha Schmidt, "Chile Referendum: Voters Decisively Rejecting a New, Egalitarian Constitution," The Washington Post, September 4, 2022, <https://www.washingtonpost.com/world/2022/09/04/chile-votes-constitution-referendum/>.
- <sup>143</sup> Sebastian Guerra and Steve Hege, "Colombia's New Administration Raises Hopes for 'Total Peace,'" United States Institute of Peace, accessed August 26, 2022, <https://www.usip.org/publications/2022/07/colombias-new-administration-raises-hopes-total-peace>.
- <sup>144</sup> "Countries and Territories," Freedom House, accessed July 12, 2022, <https://freedomhouse.org/countries/freedom-world/scores>.
- <sup>145</sup> Soo Youn, "Why It Took YouTube, Facebook and Twitter so Long to Remove Video of New Zealand Mosque Shootings," ABC News, March 17, 2019, <https://abcnews.go.com/ABCNews/youtube-facebook-twitter-scrambling-video-zealand-mosques-shooting/story?id=61707307>.
- <sup>146</sup> "The Christchurch Attacks: Livestream Terror in the Viral Video Age," Combating Terrorism Center at West Point, July 18, 2019, <https://ctc.westpoint.edu/christchurch-attacks-livestream-terror-viral-video-age/>.
- <sup>147</sup> Kate Klonick, "Inside the Team at Facebook That Dealt with the Christchurch Shooting," The New Yorker, April 25, 2019, <https://www.newyorker.com/news/news-desk/inside-the-team-at-facebook-that-dealt-with-the-christchurch-shooting>.
- <sup>148</sup> Ryan Mac, Kellen Browning, and Sheera Frenkel, "The Enduring Afterlife of a Mass Shooting's Livestream Online," The New York Times, May 19, 2022, sec. Technology, <https://www.nytimes.com/2022/05/19/technology/mass-shootings-livestream-online.html>.
- <sup>149</sup> Ryan Mac, Kellen Browning, and Sheera Frenkel, "The Enduring Afterlife of a Mass Shooting's Livestream Online," New York Times, May 19, 2022, sec. Technology, <https://www.nytimes.com/2022/05/19/technology/mass-shootings-livestream-online.html>.
- <sup>150</sup> "New Zealand: Freedom in the World 2021 Country Report," Freedom House, accessed June 22, 2022, <https://freedomhouse.org/country/new-zealand/freedom-world/2021>.
- <sup>151</sup> "What We Do," Broadcasting Standards Authority, accessed June 22, 2022, <https://www.bsa.govt.nz/about-us/what-we-do/>.
- <sup>152</sup> "Statement of Performance Expectations" (Broadcasting Standards Authority, June 30, 2022), <https://www.bsa.govt.nz/assets/Uploads/StatementsOfPerformanceExpectations/Statement-of-Performance-Expectations-Year-ending-2022.pdf>.
- <sup>153</sup> Ibid.
- <sup>154</sup> "The Complaints Process," Broadcasting Standards Authority, accessed June 24, 2022, <https://www.bsa.govt.nz/complaints/the-complaints-process/>.
- <sup>155</sup> Direct communication with Helen Cruse, Legal Manager, Broadcast Standards Authority, New Zealand, July 18, 2022.
- <sup>156</sup> "Broadcasting Standards in New Zealand: Codebook" (Broadcasting Standards Authority, April 2016), [https://www.bsa.govt.nz/assets/Broadcasting-Standards/Broadcasting-Standards-Codebook/15bed03633/160304\\_12\\_BSA\\_CODE\\_OF\\_CONDUCT\\_BOOK\\_FINAL.pdf](https://www.bsa.govt.nz/assets/Broadcasting-Standards/Broadcasting-Standards-Codebook/15bed03633/160304_12_BSA_CODE_OF_CONDUCT_BOOK_FINAL.pdf).
- <sup>157</sup> Ibid.
- <sup>158</sup> Ibid.

- 
- <sup>159</sup> Ibid.
- <sup>160</sup> Ibid.
- <sup>161</sup> Ibid.
- <sup>162</sup> “Outcomes & Remedies,” Broadcasting Standards Authority, accessed June 24, 2022, <https://www.bsa.govt.nz/complaints/outcomes-and-remedies/>.
- <sup>163</sup> “Naughton and Mainland Television Limited & Daystar Television -2021-103 (16 February 2022),” Broadcasting Standards Authority, accessed June 24, 2022, <https://www.bsa.govt.nz/decisions/all-decisions/naughton-and-mainland-television-limited-and-daystar-television-2021-103-16-february-2022/>.
- <sup>164</sup> Ibid.
- <sup>165</sup> Ibid.
- <sup>166</sup> “McAulay and MediaWorks Radio Ltd -2021-015 (11 August 2021),” Broadcasting Standards Authority, accessed June 24, 2022, <https://www.bsa.govt.nz/decisions/all-decisions/mcaulay-and/>.
- <sup>167</sup> Personal communication from Helen Cruse, Legal Manager, Broadcasting Standards Authority
- <sup>168</sup> “Our Team,” Classification Office, accessed June 24, 2022, <https://www.classificationoffice.govt.nz/about/our-team/>.
- <sup>169</sup> Charlotte Graham-McLay, “‘I’m the Last Censor in the Western World’: New Zealand’s David Shanks Tackles the c-Word,” Guardian, January 10, 2020, sec. World news, <https://www.theguardian.com/world/2020/jan/10/im-the-last-censor-in-the-western-world-new-zealands-david-shanks-tackles-the-c-word>.
- <sup>170</sup> Ibid.
- <sup>171</sup> Ibid.
- <sup>172</sup> Ibid.
- <sup>173</sup> Ibid.
- <sup>174</sup> Ibid.
- <sup>175</sup> Principles,” Media Council, accessed June 24, 2022, <https://www.mediacouncil.org.nz/principles/>.
- <sup>176</sup> “Independent Forum for Resolving Complaints,” New Zealand Media Council, accessed June 24, 2022, <https://www.mediacouncil.org.nz/>.
- <sup>177</sup> “New Zealand Press Council” (New Zealand Press Council, 2012), chrome-extension://efaidnbmninnibpcapjcgliclefindmkaj/https://www.mediacouncil.org.nz/media/website\_posts/24/AR-12.pdf.
- <sup>178</sup> “Statement of Principles,” New Zealand Media Council, accessed June 24, 2022, <https://www.mediacouncil.org.nz/principles/>.
- <sup>179</sup> Ibid.
- <sup>180</sup> “What Is the HDCA?,” Netsafe, accessed August 22, 2022, <https://netsafe.org.nz/what-is-the-hdca/>.
- <sup>181</sup> Our Story,” Netsafe, accessed June 24, 2022, <https://www.netsafe.org.nz/aboutnetsafe/our-story/>.
- <sup>182</sup> Angela Boundy, “The State of the Online Nation,” Netsafe, December 1, 2021, <https://www.netsafe.org.nz/stateoftheonlinenation/>.
- <sup>183</sup> Ibid.
- <sup>184</sup> “About the Ombudsman,” accessed June 24, 2022, <https://www.ombudsman.parliament.nz/about-ombudsman>.
- <sup>185</sup> “The Role of Ombudsman Institutions in Open Government” (European Ombudsman, n.d.), <https://www.oecd.org/gov/the-role-of-ombudsman-institutions-in-open-government.pdf>.
- <sup>186</sup> “Will You Fall for Fake News?,” Your News Bulletin, accessed June 24, 2022, <https://yournewsbulletin.co.nz/>.
- <sup>187</sup> Jack Vowles and Dr. Mona Krewel, “Election 2020 | Research,” Victoria University of Wellington, March 12, 2021, <https://www.wgtn.ac.nz/research/strengths/election>.
- <sup>188</sup> Ibid.
- <sup>189</sup> Ibid.
- <sup>190</sup> Ibid.
- <sup>191</sup> “The Edge of the Infodemic: Challenging Misinformation in Aotearoa” (Classification Office, June 2021), [https://www.classificationoffice.govt.nz/media/documents/The\\_Edge\\_of\\_the\\_Infodemic.pdf](https://www.classificationoffice.govt.nz/media/documents/The_Edge_of_the_Infodemic.pdf).
- <sup>192</sup> Katie Kenny, “David Shanks Reflecting on Five Years as Chief Censor,” Stuff, May 6, 2022, <https://www.stuff.co.nz/national/128556764/david-shanks-reflecting-on-five-years-as-chief-censor>.
- <sup>193</sup> Ibid.
- <sup>194</sup> “2020 Corruption Perceptions Index,” Transparency International, accessed June 23, 2022, <https://www.transparency.org/en/cpi/2020>.

- <sup>195</sup> 2021 Corruption Perceptions Index Transparency.org, accessed August 29, 2022, <https://www.transparency.org/en/cpi/2021>.
- <sup>196</sup> “Criminal Code Amendment (Sharing of Abhorrent Violent Material) Bill 2019 No. , 2019” (2019), [https://parlinfo.aph.gov.au/parlInfo/download/legislation/bills/s1201\\_first-senate/toc\\_pdf/1908121.pdf;fileType=application%2Fpdf](https://parlinfo.aph.gov.au/parlInfo/download/legislation/bills/s1201_first-senate/toc_pdf/1908121.pdf;fileType=application%2Fpdf).
- <sup>197</sup> Ibid.
- <sup>198</sup> Damien Cave, “Australia Passes Law to Punish Social Media Companies for Violent Posts -The New York Times,” New York Times, April 13, 2019, <https://www.nytimes.com/2019/04/03/world/australia/social-media-law.html#:~:text=%E2%80%9CThese%20platforms%20should%20not%20be,online%20seriously%2C%E2%80%9D%20he%20added>.
- <sup>199</sup> Lesley Sutton, Samantha Karpes, and Claire Arthur, “Fake News: The Australian Code of Practice on Disinformation and Misinformation,” Gilbert + Tobin, June 25, 2021, <https://www.gtlaw.com.au/insights/fake-news-look-australian-code-practice-disinformation-misinformation>.
- <sup>200</sup> Emma Croft and Sophie Dawson, “Australian Government to Introduce New Disinformation and Misinformation Laws,” Two Birds, February 22, 2022, <https://www.twobirds.com/en/insights/2022/australia/australian-government-to-introduce-new-disinformation-and-misinformation-laws>.
- <sup>201</sup> Lesley Sutton, Samantha Karpes, and Claire Arthur, “Fake News: The Australian Code of Practice on Disinformation and Misinformation,” Gilbert + Tobin, June 25, 2022, <https://www.gtlaw.com.au/insights/fake-news-look-australian-code-practice-disinformation-misinformation>.
- <sup>202</sup> Digital Industry Group Inc. (DIGI), “Australian Code of Practice on Disinformation and Misinformation” (Digital Industry Group Inc. (DIGI), February 22, 2022), <https://digi.org.au/wp-content/uploads/2021/10/Australian-Code-of-Practice-on-Disinformation-and-Misinformation-FINAL-WORD-UPDATED-OCTOBER-11-2021.pdf>.
- <sup>203</sup> “A Report to Government on the Adequacy of Digital Platforms’ Disinformation and News Quality Measures” (Australian Communications and Media Authority, June 2022), <https://www.acma.gov.au/sites/default/files/2021-11/Adequacy%20of%20digital%20platforms%20disinformation%20and%20news%20quality%20measures.pdf>.
- <sup>204</sup> Lesley Sutton, Samantha Karpes, and Claire Arthur, “Fake News: A Look into the Australian Code of Practice on Disinformation and Misinformation,” Gilbert + Tobin Insights, June 25, 2021, <https://www.gtlaw.com.au/insights/fake-news-look-australian-code-practice-disinformation-misinformation>.
- <sup>205</sup> Ibid.
- <sup>206</sup> Euronews with Reuters, “Australia to Force Big Tech Companies to Hand over Disinformation Data,” euronews, March 21, 2022, <https://www.euronews.com/next/2022/03/21/australia-will-be-able-to-force-tech-giants-to-hand-over-disinformation-data-under-new-law>.
- <sup>207</sup> Ibid.
- <sup>208</sup> Luke Buckmaster and Tyson Wils, “Responding to Fake News,” text, Parliament of Australia, accessed June 23, 2022, [https://www.aph.gov.au/About\\_Parliament/Parliamentary\\_Departments/Parliamentary\\_Library/pubs/BriefingBook46p/FakeNews](https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/BriefingBook46p/FakeNews).
- <sup>209</sup> “Australia Follows EU With Misinformation Bill,” PYMNTS, March 21, 2022, <https://www.pymnts.com/news/regulation/2022/australia-follows-eu-uk-steps-with-misinformation-bill/>.
- <sup>210</sup> Ibid.
- <sup>211</sup> Cecilia Kang, “As Europe Approves New Tech Laws, the U.S. Falls Further Behind,” The New York Times, April 22, 2022, sec. Technology, <https://www.nytimes.com/2022/04/22/technology/tech-regulation-europe-us.html>.
- <sup>212</sup> “Countries and Territories,” Freedom House, 2022, <https://freedomhouse.org/countries/freedom-world/scores>.
- <sup>213</sup> “Germany: Network Enforcement Act Amended to Better Fight Online Hate Speech,” web page, Library of Congress, accessed June 24, 2022, <https://www.loc.gov/item/global-legal-monitor/2021-07-06/germany-network-enforcement-act-amended-to-better-fight-online-hate-speech/>; “Enforcement Through the Network: The Network Enforcement Act and Article 10 of the European Convention on Human Rights,” Chicago Journal of International Law. Accessed September 13, 2022. <https://cjl.uchicago.edu/publication/enforcement-through-network-network-enforcement-act-and-article-10-european-convention>.
- <sup>214</sup> “Germany: Social Media Platforms to Be Held Accountable for Hosted Content Under ‘Facebook Act,’” web page, Library of Congress, accessed June 24, 2022, <https://www.loc.gov/item/global-legal-monitor/2017-07-11/germany-social-media-platforms-to-be-held-accountable-for-hosted-content-under-facebook-act/>.
- <sup>215</sup> Alexander Sänglerlaub, “Distorted Realities: The Perception of ‘Fake News’ in the Shadow of the USA and the Federal Election” (New Responsibility Foundation, October 2017), [https://www.stiftung-nv.de/sites/default/files/fake\\_news\\_im\\_schatten\\_der\\_usa\\_und\\_der\\_bundestagswahl\\_0.pdf](https://www.stiftung-nv.de/sites/default/files/fake_news_im_schatten_der_usa_und_der_bundestagswahl_0.pdf).

---

<sup>216</sup> Ibid.

<sup>217</sup> “Germany: Network Enforcement Act Amended to Better Fight Online Hate Speech,” web page, Library of Congress, accessed June 24, 2022, <https://www.loc.gov/item/global-legal-monitor/2021-07-06/germany-network-enforcement-act-amended-to-better-fight-online-hate-speech/>.

<sup>218</sup> Ibid.

<sup>219</sup> Ibid.

<sup>220</sup> “Initiatives to Counter Fake News in Selected Countries” (Law Library of Congress, April 2019), <https://irp.fas.org/eprint/lloc-fake-news.pdf>.

<sup>221</sup> Ibid.

<sup>222</sup> “Germany: Network Enforcement Act Amended to Better Fight Online Hate Speech,” web page, Library of Congress, accessed June 24, 2022, <https://www.loc.gov/item/global-legal-monitor/2021-07-06/germany-network-enforcement-act-amended-to-better-fight-online-hate-speech/>.

<sup>223</sup> “Initiatives to Counter Fake News in Selected Countries” (Law Library of Congress, April 2019), <https://irp.fas.org/eprint/lloc-fake-news.pdf>.

<sup>224</sup> Ibid.

<sup>225</sup> “Germany: Network Enforcement Act Amended to Better Fight Online Hate Speech,” web page, Library of Congress, Washington, D.C. 20540USA, accessed July 22, 2022, <https://www.loc.gov/item/global-legal-monitor/2021-07-06/germany-network-enforcement-act-amended-to-better-fight-online-hate-speech/>.

<sup>226</sup> “Germany: Network Enforcement Act Amended to Better Fight Online Hate Speech,” web page, Library of Congress, accessed June 24, 2022, <https://www.loc.gov/item/global-legal-monitor/2021-07-06/germany-network-enforcement-act-amended-to-better-fight-online-hate-speech/>.

<sup>227</sup> “France’s Watered-down Anti-Hate Speech Law Enters into Force,” Universal Rights Group(blog), July 16, 2020, <https://www.universal-rights.org/blog/frances-watered-down-anti-hate-speech-law-enters-into-force/>.

<sup>228</sup> “German Press Code,” Presserat, accessed July 22, 2022, <https://www.presserat.de/files/presserat/dokumente/download/Press%20Code.pdf>.

<sup>229</sup> Ibid.

<sup>230</sup> “German Press Council,” Presserat, accessed August 12, 2022, <https://www.presserat.de/en.html>.

<sup>231</sup> “German Press Council Guidelines for Journalistic Work,” Accountable Journalism, accessed June 24, 2022, <https://accountablejournalism.org/ethics-codes/Germany-Press-Council>.

<sup>232</sup> “Accountable Journalism,” accessed July 8, 2022, <https://accountablejournalism.org/ethics-codes/Germany-Press-Council>.

<sup>233</sup> “Germany | Defamation Laws,” International Press Institute(blog), accessed June 27, 2022, <http://legaldb.freemedia.at/legal-database/germany/>.

<sup>234</sup> “German Criminal Code” (Federal Ministry of Justice, n.d.), [http://www.gesetze-im-internet.de/englisch\\_stgb/englisch\\_stgb.pdf](http://www.gesetze-im-internet.de/englisch_stgb/englisch_stgb.pdf).

<sup>235</sup> Ibid.

<sup>236</sup> Ibid.

<sup>237</sup> “German Federal Public Prosecutor,” accessed July 6, 2022, <https://www.ecchr.eu/en/glossary/german-federal-public-prosecutor/>.

<sup>238</sup> “A Gathering Storm: The Laws Being Used to Silence the Media,” Index on Censorship(blog), accessed July 22, 2022, <https://www.indexoncensorship.org/campaigns/the-laws-being-used-to-silence-media/>.

<sup>239</sup> Reporters Without Borders, 2022 Press Freedom Index, <https://rsf.org/en/rsf-s-2022-world-press-freedom-index-new-era-polarisation-0>

<sup>240</sup> “Countries and Territories,” Freedom House, accessed June 22, 2022, <https://freedomhouse.org/countries/freedom-world/scores>.

<sup>241</sup> “Criminal Defamation Laws in North America,” Committee to Protect Journalists(blog), accessed June 27, 2022, <https://cpj.org/reports/2016/03/north-america/>.

<sup>242</sup> “Section 230 of the Communications Decency Act,” Electronic Frontier Foundation, accessed June 27, 2022, <https://www.eff.org/issues/cda230>.

<sup>243</sup> Ibid.

<sup>244</sup> “Six Russian GRU Officers Charged in Connection with Worldwide Deployment of Destructive Malware and Other Disruptive Actions in Cyberspace,” U.S. Department of Justice, October 19, 2020, <https://www.justice.gov/opa/pr/six-russian-gru-officers-charged-connection-worldwide-deployment-destructive-malware-and>.

- <sup>245</sup> “The ‘#Macron Leaks’ Operation: A Post-Mortem,” Atlantic Council(blog), June 20, 2019, <https://www.atlanticcouncil.org/in-depth-research-reports/report/the-macron-leaks-operation-a-post-mortem/>.
- <sup>246</sup> Angelique Chrisafis, “Emmanuel Macron Promises Ban on Fake News during Elections,” Guardian, January 3, 2018, sec. World news, <https://www.theguardian.com/world/2018/jan/03/emmanuel-macron-ban-fake-news-french-president>.
- <sup>247</sup> Zachary Young, “French Parliament Passes Law against ‘Fake News,’” POLITICO, July 4, 2018, <https://www.politico.eu/article/french-parliament-passes-law-against-fake-news/>.
- <sup>248</sup> “Law of 29 July 1881 on Freedom of the Press,” Légifrance, accessed June 27, 2022, <https://www.legifrance.gouv.fr/loda/id/LEGITEXT000006070722/>.
- <sup>249</sup> Michael-Ross Fiorentino, “France Passes Controversial ‘fake News’ Law,” Euronews, November 22, 2018, <https://www.euronews.com/2018/11/22/france-passes-controversial-fake-news-law>.
- <sup>250</sup> Zachary Young, “French Parliament Passes Law against ‘Fake News,’” POLITICO, July 4, 2018, <https://www.politico.eu/article/french-parliament-passes-law-against-fake-news/>.
- <sup>251</sup> Angelique Chrisafis, “French MPs Criticise ‘hasty and Ineffective’ Fake News Law,” The Guardian, June 8, 2018, sec. World news, <https://www.theguardian.com/world/2018/jun/07/france-macron-fake-news-law-criticised-parliament>.
- <sup>252</sup> “France: Senate Rejects ‘Fake News Ban’ Bills,” web page, Library of Congress, September 24, 2018, <https://www.loc.gov/item/global-legal-monitor/2018-09-24/france-senate-rejects-fake-news-ban-bills/>.
- <sup>253</sup> Ibid.
- <sup>254</sup> Victoria Albert, “Twitter Blocks French Government’s Posts, Citing Its Own ‘Fake News’ Law,” The Daily Beast, April 3, 2019, <https://www.thedailybeast.com/twitter-blocks-french-governments-posts-citing-its-own-fake-news-law>.
- <sup>255</sup> “Twitter Blocks French Government with Its Own Fake News Law -BBC News,” BBC News, April 3, 2019, <https://www.bbc.com/news/world-europe-47800418>.
- <sup>256</sup> Ibid.
- <sup>257</sup> Christophe Castaner [@CCastaner], “La priorité de Twitter devrait être de combattre les contenus faisant l’apologie du terrorisme. Pas les campagnes incitant à s’inscrire sur les listes électorales d’une république démocratique. Ce sujet sera abordé jeudi avec les GAFA lors du G7 des ministres de l’Intérieur.,” Tweet, Twitter, April 2, 2019, <https://twitter.com/CCastaner/status/1113129884698710016>.
- <sup>258</sup> G.Garitan, CC BY-SA 4.0 <<https://creativecommons.org/licenses/by-sa/4.0/>>, via Wikimedia Commons.
- <sup>259</sup> Emilie Boyer King, “French MP Laetitia Avia Victim of Racist Threats Speaks Up,” France 24, March 5, 2018, <https://www.france24.com/en/20180305-france-french-mp-racist-threat-laetitia-avia-fights-back-macron>.
- <sup>260</sup> Assemblée Nationale, “Bill No388, Adopted by the National Assembly, in New Reading, Aimed at Combating Hateful Content on the Internet,” Assemblée nationale, accessed July 22, 2022, [https://www.assemblee-nationale.fr/dyn/15/textes/115t0388\\_texte-adopte-seance](https://www.assemblee-nationale.fr/dyn/15/textes/115t0388_texte-adopte-seance).
- <sup>261</sup> Aurelien Breenen, “French Court Strikes Down Most of Online Hate Speech Law -The New York Times,” June 18, 2020, <https://www.nytimes.com/2020/06/18/world/europe/france-internet-hate-speech-regulation.html>.
- <sup>262</sup> “France’s Watered-down Anti-Hate Speech Law Enters into Force,” Universal Rights Group(blog), July 16, 2020, <https://www.universal-rights.org/blog/frances-watered-down-anti-hate-speech-law-enters-into-force/>.
- <sup>263</sup> Jacob Schulz, “What’s Going on With France’s Online Hate Speech Law? -Lawfare,” Lawfare, June 23, 2020, <https://www.lawfareblog.com/whats-going-frances-online-hate-speech-law>.
- <sup>264</sup> Ibid.
- <sup>265</sup> Ibid.
- <sup>266</sup> “France’s Watered-down Anti-Hate Speech Law Enters into Force,” Universal Rights Group(blog), July 16, 2020, <https://www.universal-rights.org/blog/frances-watered-down-anti-hate-speech-law-enters-into-force/>.
- <sup>267</sup> Gabriel Thierry, “The New Specialized Pole against Online Hate, a Highly Anticipated Structure,” Dalloz, February 3, 2021, <https://www.dalloz-actualite.fr/flash/nouveau-pole-specialise-contre-haine-en-ligne-une-structure-tres-attendue#.YroBHS-B1-X>.
- <sup>268</sup> Michael Fitzpatrick. “France Creates Agency to Fight Foreign Fake News Aiming to Undermine the State.” RFI France, June 5, 2021. <https://www.rfi.fr/en/france/20210605-france-creates-agency-to-fight-foreign-fake-news-aiming-to-undermine-the-state-cybercrime-russia-united-states-elections-brexit>.
- <sup>269</sup> Ibid.
- <sup>270</sup> “Countries and Territories,” Freedom House, accessed June 22, 2022, <https://freedomhouse.org/countries/freedom-world/scores>.
- <sup>271</sup> Ibid.



---

<sup>272</sup> “Sweden -U.S. Department of State,” U.S. Department of State, n.d., <https://www.state.gov/reports/2018-country-reports-on-human-rights-practices/sweden/>.

<sup>273</sup> Ibid.

<sup>274</sup> Ibid.

<sup>275</sup> “The Swedish Media Council,” Text, Government Offices of Sweden, February 24, 2015, <https://www.government.se/government-agencies/swedish-media-council/>.

<sup>276</sup> “Countries and Territories,” Freedom House, accessed June 22, 2022, <https://freedomhouse.org/countries/freedom-world/scores>.

<sup>277</sup> “Press Council: Sweden,” Accountable Journalism, n.d., <https://accountablejournalism.org/press-councils/Sweden>.

<sup>278</sup> CasparOpitz. “About the Media Ombudsman.” The Office of the Swedish Media Ombudsman, n.d. <https://mediembudsmannen.se/about-the-media-ombudsman/>.

<sup>279</sup> Ibid.

<sup>280</sup> Daniel Funke and Daniela Flamini, “A Guide to Anti-Misinformation Actions around the World,” Poynter, n.d., <https://www.poynter.org/ifcn/anti-misinformation-actions/#sweden>.

<sup>281</sup> “About Us,” The Swedish Psychological Defense Agency, February 28, 2022, <https://www.mpf.se/en/about-us/>.

<sup>282</sup> “Frequently Asked Questions,” The Swedish Psychological Defense Agency, February 28, 2022, <https://www.mpf.se/en/frequently-asked-questions/>.

<sup>283</sup> Ibid.

<sup>284</sup> “The Brochure If Crisis or War Comes,” Swedish Civil Contingencies Agency, accessed June 27, 2022, <https://www.msb.se/en/rad-till-privatpersoner/the-brochure-if-crisis-or-war-comes/>.

<sup>285</sup> Ibid.

<sup>286</sup> Adela Suliman, “Sweden Sets up Psychological Defense Agency to Fight Fake News, Foreign Interference,” Washington Post, January 6, 2022, <https://www.washingtonpost.com/world/2022/01/06/sweden-fake-news-psychological-defence-agency/>.

<sup>287</sup> Christina Anderson, “Rightist Party in Sweden Gets No Formal Role but Big Say in Government,” The New York Times, October 17, 2022, sec. World, <https://www.nytimes.com/2022/10/17/world/europe/sweden-democrats-government-immigration.html>.

<sup>288</sup> “A Guide to Anti-Misinformation Actions around the World,” Poynter Institute, accessed September 16, 2022, <https://www.poynter.org/ifcn/anti-misinformation-actions/>.

<sup>289</sup> Daniel Funke and Daniela Flamini, “A Guide to Anti-Misinformation Actions around the World,” n.d., <https://www.poynter.org/ifcn/anti-misinformation-actions/>.

<sup>290</sup> 289Kamya Yadav et al., “COUNTRIES HAVEMORE THAN 100 LAWS on the Books to Combat Misinformation How Well Do They Work?,” Bulletin of the Atomic Sciences, May 11, 2021, [https://drive.google.com/file/d/1MFVo5m60I79ZJ0roY0ktCI7bu-j74WGA/view?usp=embed\\_facebook](https://drive.google.com/file/d/1MFVo5m60I79ZJ0roY0ktCI7bu-j74WGA/view?usp=embed_facebook).

<sup>291</sup> Democratic Institutions, “Cabinet Directive on the Critical Election Incident Public Protocol,” Government of Canada, August 9, 2021, <https://www.canada.ca/en/democratic-institutions/services/protecting-democracy/critical-election-incident-public-protocol/cabinet.html>.

<sup>292</sup> “Government of Canada Introduces Legislation to Modernize the Electoral System, Making It More Accessible, Transparent, and Secure,” news releases, Government of Canada, April 30, 2018, <https://www.canada.ca/en/democratic-institutions/news/2018/04/government-of-canada-introduces-legislation-to-modernize-the-electoral-system-making-it-more-accessible-transparent-and-secure.html>.

<sup>293</sup> Shaun Walker, “Hungarian Journalists Fear Coronavirus Law May Be Used to Jail Them,” Guardian, April 3, 2020, sec. World news, <https://www.theguardian.com/world/2020/apr/03/hungarian-journalists-fear-coronavirus-law-may-be-used-to-jail-them>.

<sup>294</sup> “Algeria Criminalizes ‘Fake News’ to Protect ‘State Security,’” Aljazeera, April 22, 2022, <https://www.aljazeera.com/news/2020/4/22/algeria-criminalises-fake-news-to-protect-state-security>.

<sup>295</sup> Kamya Yadav et al., “COUNTRIES HAVE MORE THAN 100 LAWS on the Books to Combat Misinformation How Well Do They Work?,” Bulletin of the Atomic Sciences, May 11, 2021, [https://drive.google.com/file/d/1MFVo5m60I79ZJ0roY0ktCI7bu-j74WGA/view?usp=embed\\_facebook](https://drive.google.com/file/d/1MFVo5m60I79ZJ0roY0ktCI7bu-j74WGA/view?usp=embed_facebook).

<sup>296</sup> Ibid.

<sup>297</sup> “The Digital Services Act: Ensuring a Safe and Accountable Online Environment,” Text, European Commission - European Commission, accessed June 28, 2022, [https://ec.europa.eu/info/strategy/priorities-2019-2024/europe-fit-digital-age/digital-services-act-ensuring-safe-and-accountable-online-environment\\_en](https://ec.europa.eu/info/strategy/priorities-2019-2024/europe-fit-digital-age/digital-services-act-ensuring-safe-and-accountable-online-environment_en).

- <sup>298</sup> Ryan Browne, “EU Agrees on Landmark Law Aimed at Forcing Big Tech Firms to Tackle Illegal Content,” CNBC, April 23, 2022, <https://www.cnbc.com/2022/04/22/digital-services-act-eu-agrees-new-rules-for-tackling-illegal-content.html> ; “The Digital Services Act: Ensuring a Safe and Accountable Online Environment,” Text, European Commission -European Commission, accessed June 28, 2022, [https://ec.europa.eu/info/strategy/priorities-2019-2024/europe-fit-digital-age/digital-services-act-ensuring-safe-and-accountable-online-environment\\_en](https://ec.europa.eu/info/strategy/priorities-2019-2024/europe-fit-digital-age/digital-services-act-ensuring-safe-and-accountable-online-environment_en).
- <sup>299</sup> “The Digital Services Act: Ensuring a Safe and Accountable Online Environment,” Text, European Commission - European Commission, accessed June 28, 2022, [https://ec.europa.eu/info/strategy/priorities-2019-2024/europe-fit-digital-age/digital-services-act-ensuring-safe-and-accountable-online-environment\\_en](https://ec.europa.eu/info/strategy/priorities-2019-2024/europe-fit-digital-age/digital-services-act-ensuring-safe-and-accountable-online-environment_en).
- <sup>300</sup> Ibid.
- <sup>301</sup> Jon Brodtkin, “EU Announces Big Tech Crackdown, Demands Interoperability between Platforms,” Ars Technica, March 25, 2022, <https://arstechnica.com/tech-policy/2022/03/eu-to-regulate-gatekeepers-in-crackdown-on-google-apple-amazon-facebook/>.
- <sup>302</sup> Emma Roth, “The EU Could Start Enforcing Rules to Regulate Big Tech in Spring 2023,” The Verge, May 8, 2022, <https://www.theverge.com/2022/5/8/23062666/eu-start-enforcing-the-dma-digital-markets-act-spring-2023-big-tech-regulation>.
- <sup>303</sup> “Digital Markets Act: Ensuring Fair and Open Digital Markets,” Text, European Commission -European Commission, accessed June 28, 2022, [https://ec.europa.eu/commission/presscorner/detail/en/QANDA\\_20\\_2349](https://ec.europa.eu/commission/presscorner/detail/en/QANDA_20_2349).
- <sup>304</sup> “Deal on Digital Markets Act: Ensuring Fair Competition and More Choice for Users,” European Parliament, March 24, 2022, <https://www.europarl.europa.eu/news/en/press-room/20220315IPR25504/deal-on-digital-markets-act-ensuring-fair-competition-and-more-choice-for-users>.
- <sup>305</sup> “The 2022 Code of Practice on Disinformation,” European Commission, accessed August 10, 2022, <https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation>.
- <sup>306</sup> Brooke Tanner, “EU Code of Practice on Disinformation,” August 5, 2022, <https://www.brookings.edu/blog/techtank/2022/08/05/eu-code-of-practice-on-disinformation/>.
- <sup>307</sup> “Signatories of the 2022 Strengthened Code of Practice on Disinformation,” European Commission, June 16, 2022, <https://digital-strategy.ec.europa.eu/en/library/signatories-2022-strengthened-code-practice-disinformation>.
- <sup>308</sup> “The 2022 Code of Practice on Disinformation,” European Commission, accessed August 10, 2022, <https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation>.
- <sup>309</sup> Amy Yee, “The Country Inoculating against Disinformation,” BBC, January 30, 2022, <https://www.bbc.com/future/article/20220128-the-country-inoculating-against-disinformation>.
- <sup>310</sup> Keith Collins and Sheera Frenkel, “Can You Spot the Deceptive Facebook Post?,” The New York Times, September 4, 2018, sec. Technology, <https://www.nytimes.com/interactive/2018/09/04/technology/facebook-influence-campaigns-quiz.html>, <https://www.nytimes.com/interactive/2018/09/04/technology/facebook-influence-campaigns-quiz.html>.
- <sup>311</sup> “FactCheck.Org,” FactCheck.org, accessed August 8, 2022, <https://www.factcheck.org/>.
- <sup>312</sup> Amy Yee, “The Country Inoculating against Disinformation,” accessed June 28, 2022, <https://www.bbc.com/future/article/20220128-the-country-inoculating-against-disinformation> ; Jon Henley, “How Finland Starts Its Fight against Fake News in Primary Schools,” Guardian, January 29, 2020, sec. World news, <https://www.theguardian.com/world/2020/jan/28/fact-from-fiction-finlands-new-lessons-in-combating-fake-news>.
- <sup>313</sup> “Countries and Territories,” Freedom House, accessed June 22, 2022, <https://freedomhouse.org/countries/freedom-world/scores>.
- <sup>314</sup> Amy Yee, “The Country Inoculating against Disinformation,” accessed June 28, 2022, <https://www.bbc.com/future/article/20220128-the-country-inoculating-against-disinformation>.
- <sup>315</sup> Camila Domonoske, “Students Have ‘Dismaying’ Inability To Tell Fake News From Real, Study Finds,” NPR, November 23, 2016, sec. America, <https://www.npr.org/sections/thetwo-way/2016/11/23/503129818/study-finds-students-have-dismaying-inability-to-tell-fake-news-from-real> ; “National Study of High School Students’ Digital Skills Paints Worrying Portrait, Stanford Researchers Say,” Stanford Graduate School of Education, May 27, 2021, <https://ed.stanford.edu/news/national-study-high-school-students-digital-skills-paints-worrying-portrait-stanford>.
- <sup>316</sup> “MediaWise,” Poynter(blog), accessed August 9, 2022, <https://www.poynter.org/mediawise/>.
- <sup>317</sup> Nico Grant and Tiffany Hsu, “Google Looks to Vaccination to Combat MisinformationInSearches,” New York Times, August 24, 2022, <https://www.nytimes.com/2022/08/24/technology/google-search-misinformation.html>.
- <sup>318</sup> Ibid.

- 
- <sup>319</sup> “Schenck v. U.S.,” Oyez, accessed June 28, 2022, <https://www.oyez.org/cases/1900-1940/249us47>.
- <sup>320</sup> Karen Hao, “How Facebook and Google Fund Global Misinformation,” MIT Technology Review, November 20, 2021, <https://www.technologyreview.com/2021/11/20/1039076/facebook-google-disinformation-clickbait/>.
- <sup>321</sup> “What We Do,” Broadcasting Standards Authority, accessed June 22, 2022, <https://www.bsa.govt.nz/about-us/what-we-do/>.
- <sup>322</sup> “The U.S. Constitution: Preamble,” United States Courts, accessed November 7, 2022, <https://www.uscourts.gov/about-federal-courts/educational-resources/about-educational-outreach/activity-resources/us>.
- <sup>323</sup> Ibid.
- <sup>324</sup> Stuart Lambon, “Center for Countering Digital Hate,” Center for Countering Digital Hate | CCDH, accessed June 28, 2022, <https://counterhate.com/>.
- <sup>325</sup> Julia Cagé, *The Price of Democracy: How Money Shapes Politics and What to Do About It*, 2020, <https://www.jstor.org/stable/j.ctvx0789c> ; Martin Gilens and Bengamin Paige, *Democracy in America? What Has Gone Wrong and What We Can Do About It*, 2020, <https://press.uchicago.edu/ucp/books/book/chicago/D/bo58174159.html> ; Frances Moore Lappé and Adam Eichen, *Daring Democracy: Igniting Power, Meaning, and Connection for the America We Want*, 2017.
- <sup>326</sup> Tom Rosentiel, “The Problem of American Exceptionalism,” Pew Research Center(blog), May 9, 2006, <https://www.pewresearch.org/2006/05/09/the-problem-of-american-exceptionalism/>.
- <sup>327</sup> “Countries and Territories,” Freedom House, accessed June 22, 2022, <https://freedomhouse.org/countries/freedom-world/scores>.
- <sup>328</sup> An online guide to democracy reforms underway across the country: [www.democracymovement.us](http://www.democracymovement.us)
- <sup>329</sup> Democracy Initiative, [www.democracyinitiative.org](http://www.democracyinitiative.org)
- <sup>330</sup> “Sourced from the Union of Concerned Scientists’ resource guide --Countering Disinformation in Your Community--based on the intellectual property of communications strategist Sabrina Joy Stevens.”
- <sup>331</sup> “Freedom in the World Research Methodology,” Freedom House, accessed November 8, 2022, <https://freedomhouse.org/reports/freedom-world/freedom-world-research-methodology>.
- <sup>332</sup> “Index | RSF,” Reporters Without Borders, accessed November 8, 2022, <https://rsf.org/en/index>.