
November 28, 2023

VIA EMAIL

Dr. Claudine Gay
President
Harvard University
Massachusetts Hall
Cambridge, Massachusetts 02138

Ms. Diane E. Lopez
Vice President and General Counsel
Harvard University Office of the General Counsel
Smith Campus Center, Suite 980
1350 Massachusetts Avenue
Cambridge, Massachusetts 02138

The Honorable Miguel Angel Cardona
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Re: Disclosure of Evidence of Meta (formerly Facebook) influencing Harvard University's Kennedy School of Government

Dear President Gay, Ms. Lopez, and Secretary Cardona:

1. Whistleblower Aid represents Dr. Joan Donovan (“Dr. Donovan”), a highly respected subject-matter expert on misinformation, disinformation, online extremism, and media manipulation.¹ Her expertise in this area has been widely recognized by peers, institutions, and the U.S. Government. Notably, in 2020

¹ “Joan Donovan,” *Harvard Kennedy School*, Harvard Kennedy School, Mar. 9, 2019, <https://www.hks.harvard.edu/faculty/joan-donovan> [<https://archive.ph/AW0oQ>].

Congress called on Dr. Donovan to testify as a subject matter expert on manipulation and deception in the digital age.²

2. From December 10, 2018, until August 31, 2023, Dr. Donovan worked for Harvard University’s John F. Kennedy School of Government (“Kennedy School” or “HKS”) where she most recently served as the Director of the Technology and Social Change Research Project (“TASC”) while concurrently serving as the Research Director of the Shorenstein Center. TASC resided within the Shorenstein Center on Media, Politics, and Public Policy, and the project’s focus was research into media manipulation campaigns – a critical national security issue in light of bad actors’ efforts to influence U.S. discourse and elections.³
3. In December 2021, the Chan Zuckerberg Initiative committed \$500 million to Harvard for a University-wide center on Artificial Intelligence, which we believe is the largest single contribution/commitment in the history of the university.⁴ Mark Zuckerberg, the founder of Facebook (now Meta) attended Harvard University and his spouse, Priscilla Chan, is an alumnus.⁵
4. Dr. Donovan’s personal experience and documentary evidence establishes that in order to protect the interests of high-value donors with obvious and direct ties to Meta/Facebook, Kennedy School leadership began to target Dr. Donovan’s team, their work, and her personally in an effort to diminish – if not destroy – their research and public engagement despite the ample funding raised by Dr. Donovan, which still resides in Harvard University’s bank account.
5. Ultimately, by correspondence dated July 13, 2023, and despite being contracted to continue in her role through December 31, 2024,⁶ the Kennedy

² “Digital Age and Disinformation,” *C-SPAN*, Jan. 8, 2020, <https://www.c-span.org/video/?467925-1/digital-age-disinformation> (Last accessed Aug. 14, 2023).

³ Tom McCarthy, “How Russia used social media to divide Americans” *The Guardian*, Oct. 14, 2017, <https://www.theguardian.com/us-news/2017/oct/14/russia-us-politics-social-media-facebook> (Last accessed Oct. 4, 2023).

⁴ Thomas Maisonneuve, et al., “Chan Zuckerberg Initiative Pledges \$500 Million for AI Institute at Harvard” *The Harvard Crimson*, Dec. 8, 2021, <https://www.thecrimson.com/article/2021/12/8/chan-zuckerberg-donates-500-million/> (Last accessed Oct. 4, 2023).

⁵ Priscilla Chan and Mark Zuckerberg, “Priscilla Chan and Mark Zuckerberg, CZI Co-Founders and Co-CEOs (Our Leadership),” *Chan Zuckerberg Initiative*, <https://chanzuckerberg.com/about/leaders/> (Last accessed Oct. 4, 2023).

⁶ Email correspondence from Jen Goodman, Associate Director of Human Resources/Senior Human Resources Consultant to Joan Donovan (dated Oct. 13, 2021), a copy of which is included at Exhibit “1”.

School informed Dr. Donovan that they are ending the TASC program and her employment effective August 31, 2023. They further informed Dr. Donovan that her role as Research Director for the Shorenstein Center is being eliminated.⁷

6. The facts in this case are similar in motive and tactics to prior industry campaigns of Big Tobacco, Oil and Gas, and Big Pharma, each of which manipulated institutions into producing “research” products that supported their respective industries and further harmful public narratives.⁸
7. Given these actions, we are filing this disclosure to urge you to conduct an investigation into the Kennedy School’s activity and take any and all appropriate corrective action to protect academic integrity and freedom going forward, including to ensure the Kennedy School’s use of donor funds as intended.
8. Please be advised that although the undersigned, as counsel, has prepared this formal disclosure for submission, Dr. Donovan has reviewed its contents and the positions espoused herein should be considered as her own. Thus, where a factual statement is asserted and does not include a citation to a supporting document or declaration, the source is Dr. Donovan.

Dr. Joan Donovan

9. Dr. Donovan was the Research Director of the Kennedy School’s Shorenstein Center on Media, Politics, and Public Policy where she led TASC.⁹ She was recruited by the then-Director, Shorenstein Center on Media, Politics and Public Policy, and Setti Warren, now the Director of the Institute of Politics, to become a project director of TASC. After a six month negotiation process, in December 2018 she began working with the Shorenstein Center.¹⁰ Dr. Donovan is among the world’s foremost experts on technology studies, misinformation/

⁷ Email correspondence from Jen Goodman, Associate Director of Human Resources/Senior Human Resources Consultant to Joan Donovan (dated July 13, 2023), a copy of which is included at Exhibit “2”.

⁸ Mohamed Abdalla, “The Grey Hoodie Project: Big Tobacco, Big Tech, and the Threat on Academic Integrity.” *Department of Computer Science, Centre for Ethics & Department of Computer Science University of Toronto Canada*, Apr. 27, 2021, https://www.cs.toronto.edu/~msa/pdf/grey_hoodie.pdf (Last accessed Oct. 4, 2023).

⁹ “Technology & Social Change,” *Shorenstein Center*, Harvard Kennedy School, <https://shorensteincenter.org/programs/technology-social-change/> (Last accessed Oct. 4, 2023); LinkedIn *Joan Donovan*, <https://www.linkedin.com/in/joan-donovan-4bb7471bb/> (Last accessed Oct. 4, 2023).

¹⁰ Declaration of Joan Donovan at ¶¶ 5-6 (Oct. 28, 2023) (“Donovan Decl.”), a copy of which is included at Exhibit “3”.

disinformation, media manipulation, online extremism, and digital politics. Her work is particularly timely as it is used to inform policymakers as they legislate how the U.S. Government shapes policies to protect American democracy and national security.

10. Prior to joining Harvard University, Dr. Donovan was the Research Lead for the Media Manipulation Initiative at Data & Society, an independent non-profit research organization. While there she led a multi-million dollar initiative with a team of fourteen researchers where they mapped how interest groups, governments, political operatives, corporations, and others use the internet and media to disrupt social institutions.¹¹ It is because of her notable work and timely research at Data & Society that the Kennedy School recruited her to join their ranks.¹²
11. Dr. Donovan has authored over 35 articles, papers, and a book. Most recently in 2022, Dr. Donovan co-authored *Meme Wars: The Untold Story of the Online Battles Upending Democracy in America*, a book that investigates how “the digital underworld” is weaponized by extremists and impacts American democracy.¹³ She received her Ph.D. in Sociology and Science Studies from the University of California San Diego in 2015, and was a postdoctoral fellow at the University of California, Los Angeles (“UCLA”) Institute for Society and Genetics from 2015-2017.¹⁴
12. After Kennedy School leadership materially and significantly changed her duties, responsibilities, and working conditions around the time the University secured major funding from the Chan Zuckerberg Initiative and after she began a project called “Facebook Archive” to make Frances Haugen’s (“Ms. Haugen’s”) documents publicly accessible, in July 2023 the Kennedy School notified Dr. Donovan that her employment would cease effective August 31, 2023.¹⁵ Accordingly, Dr. Donovan has been forced to transition out of the Kennedy School, leaving millions of dollars in funding and the major corpus of her research at the Kennedy School.

¹¹ Jake Dow, “Data & Society – Joan Donovan,” *Data & Society*, <https://datasociety.net/people/donovan-joan/> (Last accessed Oct. 4, 2023).

¹² Donovan Decl. at ¶ 4.

¹³ Joan Donovan, et al., *Meme Wars: The Untold Story of the Online Battles Upending Democracy in America* (2022).

¹⁴ Donovan Decl. at ¶ 3.

¹⁵ Email correspondence from Jen Goodman, Associate Director of Human Resources/Senior Human Resources Consultant to Joan Donovan (dated July 13, 2023), a copy of which is included at Exhibit “2”.

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13. Thereafter on August 16, 2023, Boston University announced that on September 1, 2023, Dr. Donovan, a “Nationally Recognized Expert in Misinformation And Disinformation”, will join the university as an assistant professor in the College of Communication. She currently holds dual appointments in the Division of Emerging Media Studies and the Journalism Department.¹⁶
14. Dr. Donovan’s work could not be more timely or critical to the United States and democracy more broadly. According to *Forbes Magazine*, 4.9 billion people across the globe use social media and 2.9 billion people worldwide use Facebook;¹⁷ 70% of Internet users worldwide are active on at least one Meta platform, and within the US, 70% of adults use Facebook.¹⁸ Those users and consumers often make significant decisions that affect their lives and the lives of others based upon the information to which they are exposed, every single day, on social media. Accordingly, each of these users are susceptible to the malign influence of the very actors and social media systems Dr. Donovan studies. In a November 2023 lawsuit brought by the Commonwealth of Massachusetts against Meta and Instagram, the Attorney General averred that Meta purposefully designed Instagram to prioritize teens’ attention and engagement over well-being.¹⁹ The lawsuit draws, in part, from the documents disclosed by Frances Haugen that Dr. Donovan was attempting to make publicly available.
15. Over the arc of her career, Dr. Donovan’s research has shifted focus from solely looking at the bad actors conducting media manipulation campaigns themselves to the design of social media systems and, more broadly, the corporate responsibility – or irresponsibility – of technology companies. Boston University describes her work writing:

¹⁶ “Joan Donovan, Nationally Recognized Expert in Misinformation and Disinformation, Joins BU Faculty,” *Boston University*, Aug. 16, 2023, <https://www.bu.edu/articles/2023/misinformation-expert-joan-donovan-joins-bu-faculty/> (Last accessed Oct. 4, 2023).

¹⁷ Wong, Belle. “Top Social Media Statistics And Trends Of 2023,” *Forbes*, May 18, 2023 <https://www.forbes.com/advisor/business/social-media-statistics/#source> (Last accessed November 15, 2023)

¹⁸ Newberry, Christina. “42 Facebook Statistics Marketers Need to Know in 2023,” January 17, 2023, <https://blog.hootsuite.com/facebook-statistics/> (Last accessed November 15, 2023).

¹⁹ Complaint for Plaintiff at ____, Commonwealth of Massachusetts v. Meta Platforms, Inc. and Instagram, LLC, 2384 CV 02397-BLS1 (Nov. 6, 2023) <https://the-citizens.com/wp-content/uploads/2023/11/2023.11.6-Updated-Redacted-Meta-Complaint-FI-LED-c.pdf> (Last accessed Nov. 15, 2023).

Donovan’s work in misinformation and disinformation puts her right in the middle of a dark web of online vitriol. She wades into cynical and sometimes downright violent posts by extremists and conspiracy theorists, often picking up on nascent movements and bad actors even before they gain mainstream attention.²⁰

16. As a result of malign actors' activity and the inherent and significant risk social media systems pose to the United States and democracy more broadly, Dr. Donovan’s research is – and must continue to be – guided by academic freedom and not subjected to undue influence. Her research is – and must continue to be – informed by unbiased and unvarnished data and methodology.²¹ Finally, to have the impact her research demands, the results must be shared freely and unmanipulated with academics, journalists, policymakers, technologists, and the general public.
17. Given that consumers of her research include scholars, members of the press and U.S. Government policymakers, the validity and credibility of her research must be beyond reproach.²² As such, the very social media system platforms Dr. Donovan investigates cannot in any way, shape, or form be permitted to influence her research goals or employment through the institution where it is conducted.
18. Dr. Donovan’s research is essential in our current environment where social media companies, and technology corporations more broadly, have an outsized impact on public discourse.²³ Elected officials and regulators are lagging in creating laws, rules, and regulations that can effectively guide these companies through oversight and enforcement, oftentimes only taking action and proposing

²⁰ “Joan Donovan, Nationally Recognized Expert in Misinformation and Disinformation, Joins BU Faculty,” *Boston University*, Aug. 16, 2023, <https://www.bu.edu/articles/2023/misinformation-expert-joan-donovan-joins-bu-faculty/> (Last accessed Oct. 4, 2023).

²¹ Dr. Donovan never took data or money from the social media and technology companies for her research.

²² “Digital Age and Disinformation,” *C-SPAN*, Jan. 8, 2020, <https://www.c-span.org/video/?467925-1/digital-age-disinformation> (Last accessed Aug. 14, 2023).

²³ Richard Wike, et. al. “2. Views of social media and its impacts on society.” *Pew Research Center*, Dec. 6, 2022, <https://www.pewresearch.org/global/2022/12/06/views-of-social-media-and-its-impacts-on-society-in-advanced-economies-2022/> (Last accessed Oct. 4, 2023).

new regulations after large scale mistakes or harms come to light.²⁴ The majority of internet users in a 2022 Pew Research Center report that false information is a major threat within society and that social media makes online manipulation easier.²⁵

19. On December 7, 2021, the Chan Zuckerberg Initiative committed \$500 million to Harvard for a University-wide center on Artificial Intelligence.²⁶ Subsequent to learning that Dr. Donovan was intending to create a public archive of internal Facebook documents disclosed by Ms. Haugen in October 2021, Dr. Donovan was increasingly blocked from continuing her research. She was prevented from meaningfully contributing to the field of study where she has spent her career becoming an expert. On August 24, 2022, Dean Douglas Elmendorf (“Dean Elmendorf”), Dean of the Kennedy School, put Dr. Donovan on a hiring and fundraising freeze. Moreover, Dean Elmendorf told her that she did not have academic freedom or even the legal “rights” to her own research. Finally in January 2023, she was barred from hosting public events and restricted from any activity that would “raise her profile,” and thus her research, from gaining any meaningful reception.²⁷

20. Dean Elmendorf was very concerned with donors and maintaining his narrative of why TASC was being shut down. In January 2023, Dean Elmendorf told Dr. Donovan that she was not allowed to communicate to donors and supporters her understanding of what was taking place. He summarized in an email writing, “On communications with supporters of the Shorenstein Center and of Harvard more broadly: It’s important that members of the Shorenstein advisory board

²⁴ Adam Satariano, “E.U. Takes Aim at Social Media's Harms With Landmark New Law, (Published 2022),” *The New York Times*, Apr. 22, 2022, <https://www.nytimes.com/2022/04/22/technology/european-union-social-media-law.html> (Last accessed Oct. 5, 2023); Zack Whittaker, “What we learned when Twitter whistleblower Mudge testified to Congress,” *TechCrunch*, Sept. 13, 2022, <https://techcrunch.com/2022/09/13/twitter-whistleblower-mudge-congress/> (Last accessed Oct. 5, 2023); Jon Fingas, “TikTok whistleblower claims US data privacy efforts are seriously flawed,” *Engadget*, Mar. 10, 2023, <https://www.engadget.com/tiktok-whistleblower-claims-us-data-privacy-efforts-are-seriously-flawed-211255093.html> (Last accessed Oct. 5, 2023).

²⁵ Wike, *supra* note 23.

²⁶ Thomas Maisonneuve, et al., “Chan Zuckerberg Initiative Pledges \$500 Million for AI Institute at Harvard | News,” *The Harvard Crimson*, Dec. 8, 2021, <https://www.thecrimson.com/article/2021/12/8/chan-zuckerberg-donates-500-million/> (Last accessed Oct. 4, 2023).

²⁷ Donovan Decl. at ¶¶ 56, 100 -104, 161-166.

and other donors and grantors hear a consistent and accurate explanation of what’s happening with you and your project. I expect that you will coordinate with Nancy and Laura [Dr. Donovan’s supervisors, Ms. Nancy Gibbs and Ms. Laura Manley] on an ongoing basis to be sure that is happening.”²⁸ These restrictions violate Dr. Donovan’s civil rights, including her freedom of speech and freedom of association.

- 21. All of this happened because Dr. Donovan’s research struck a chord counter to Meta’s corporate interests.** When that happened, the Kennedy School took Meta’s side in order to protect a significant financial contribution – and numerous relationships with donors affiliated with Meta. After October 2021, whenever Dr. Donovan interacted with Kennedy School leadership about her research, they began adopting Meta’s language and questioned Dr. Donovan’s research methodologies – specifically with respect to Facebook – in order to protect their own financial interests. It became abundantly clear that Kennedy School leadership was taking its cues from Meta and acting on behalf of Meta’s best interests.
- 22.** All of the efforts taken to undermine Dr. Donovan came at great costs – to the donors who contributed millions of dollars to her work, and to the public more broadly who every day, all day long, are exposed to disinformation and misinformation. Moreover, there is the impact on Harvard University directly. Kennedy School leadership, their actions and decisions, have directly affected the Shorenstein Center and the Kennedy School’s integrity and reputation. In the end, much like Meta/Facebook putting profits over people,²⁹ the Kennedy School has put financial gain over objective truth and the pursuit of knowledge.

Academic Freedom

- 23.** In a one-on-one meeting with Dean Elmendorf on August 24, 2022, he informed Dr. Donovan that she did not have academic freedom at the Kennedy School. Harvard University publishes a “University-Wide Statement on Rights and Responsibilities” – **rights and responsibilities that apply to “all members of the community” within the university.** It states that the “central functions of an academic community are learning, teaching, research and scholarship,” underscoring that the University places special emphasis on certain values

²⁸ Donovan Decl. at ¶ 166.

²⁹ Ryan Mack and Cecilia Kang, “Whistle-Blower Says Facebook ‘Chooses Profits Over Safety’” *The New York Times*, Oct. 3, 2021, <https://www.nytimes.com/2021/10/03/technology/whistle-blower-facebook-frances-haugen.html> (Last accessed Oct. 20, 2023).

“which are essential to its nature as an academic community.”³⁰ Among those are academic freedom. The statement reads, in pertinent part:

The University places special emphasis, as well, upon certain values which are essential to its nature as an academic community. **Among these are freedom of speech and academic freedom**, freedom from personal force and violence, and freedom of movement. Interference with any of these freedoms must be regarded as a serious violation of the personal rights upon which the community is based. Furthermore, although the administrative process and activities of the University cannot be ends in themselves, such functions are vital to the orderly pursuit of the work of all members of the University. **Therefore, interference with members of the University in performance of their normal duties and activities must be regarded as unacceptable obstruction of the essential processes of the University.** Theft or willful destruction of the property of the University or its members must also be considered as unacceptable violation of the rights of individuals or of the community as a whole.

Moreover, it is the responsibility of all members of the academic community to maintain an atmosphere in which violations of rights are unlikely to occur and to develop processes by which these rights are fully assured. In particular, it is the responsibility of officers of administration and instruction to be alert to the needs of the University community; to give full and fair hearing to reasoned expressions of grievances; and to respond promptly and in good faith to such expressions and to widely expressed needs for change. In making decisions which concern the community as a whole or any part of the community, officers are expected to consult with those affected by the decisions. Failures to meet these responsibilities may be profoundly damaging to the life of the University. Therefore, the University community has the right to establish orderly procedures consistent with imperatives of academic freedom to assess the policies and assure the responsibility of those whose decisions affect the life of the University.

No violation of the rights of members of the University, nor any failure to meet responsibilities, should be interpreted as justifying any violation of the rights of members of the University. **All members of the community – students and officers alike – should uphold the rights and responsibilities expressed in**

³⁰ Harvard University, “University-Wide Statement on Rights and Responsibilities | Office of the Provost,” Office of the Provost, <https://provost.harvard.edu/university-wide-statement-rights-and-responsibilities> (Last accessed Oct. 4, 2023) (emphasis supplied).

this Statement if the University is to be characterized by mutual respect and trust.³¹

24. Accordingly, this stated policy should be the guiding principle in how the University treats its academics, researchers, students, and programs.

Dr. Donovan's Work at Harvard

25. Until her removal from Harvard and the dissolution of TASC, Dr. Donovan and her team had been working on a number of projects. Some of those projects fulfilled specific deliverables for grantors funding the research and work of the TASC team. These grant deliverables included, but were not limited to, the following:

- a. **The Media Manipulation Casebook:** A digital research platform linking together theory, methods, and practice for mapping media manipulation and disinformation campaigns. This resource was intended for researchers, journalists, technologists, policymakers, educators, and civil society organizers who want to learn about detecting, documenting, describing, and debunking misinformation.³²
- b. **True Costs of Misinformation:** There are financial, social, and human costs to misinformation. Work in this area focused on how researchers can support public officials and communities targeted by disinformation campaigns.³³
- c. **Race, Media & Tech:** The impacts of technology and mis- and disinformation in communities of color is under-researched and often misunderstood. Led by Dr. Donovan and [NAME REDACTED], the research investigated racialized disinformation and how it mobilizes white supremacists' violence, disrupts the advocacy of civil society organizations, and saps the public's ability to discern truth from disinformation.³⁴

³¹ *Id.* (emphasis supplied).

³² The Technology and Social Change Project, *Media Manipulation Casebook: Homepage*, <https://mediamanipulation.org/>, (Last accessed Oct. 4, 2023).

³³ Joan Donovan, et al., "True Costs of Misinformation," *Shorenstein Center*, <https://shorensteincenter.org/programs/technology-social-change/true-costs-misinformation> (Last accessed Oct. 4, 2023).

³⁴ Joan Donovan, and [NAME REDACTED], "Race, Media and Technology," *Shorenstein Center*, <https://shorensteincenter.org/programs/technology-social-change/race-and-tech/> (Last accessed Oct. 4, 2023).

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- d. **News Leaders Summit:** The Shorenstein Center News Leaders program brought together small cohorts of press leaders to tackle the problem of misinformation-at-scale and media manipulation.³⁵
 - e. **FB Archive:** FBarchive.org is an online resource for researchers, journalists, and the general public to analyze and investigate the documents disclosed by Ms. Haugen to government regulators, which showed Facebook’s knowledge about their product’s harms. Having helped recruit Dr. Sweeney to join the Shorenstein Center at the Kennedy School, Dr. Donovan invited Dr. LaTanya Sweeney (“Dr. Sweeney”) to collaborate with TASC and Laura Manley, the Executive Director of the Shorenstein Center (“Ms. Manley”) to create a publicly accessible collection of the Facebook documents, including the ability for users to analyze and annotate the documents.
 - f. **Forbidden Knowledge:** Medical Misinformation has grown in the social media ecosystem, largely unabated. This research project analyzed how medical and scientific knowledge is distributed and maligned in online environments.

Financial Support for Dr. Donovan’s Research

26. Upon review of Dr. Donovan’s official personnel file, there were no employee complaints or violations of school policy, only evidence of performance raises and promotions throughout her time at the Kennedy School, illustrating that Dr. Donovan was a model employee who brought great credit to both the Shorenstein Center and the Kennedy School. To that end, in both 2019 and 2020, Ms. Manley provided Dr. Donovan with exceptionally strong performance reviews.³⁶ In 2019 Ms. Manley referenced Dr. Donovan’s “remarkable talents” and called her a “brilliant and unique leader who is building a foundation of work that is having meaningful impact in our country and our world.” In 2020 she noted that Dr. Donovan’s work has had “tremendous impact and has lifted the prestige of the Shorenstein Center as well as Harvard Kennedy School.” Excerpts of Ms. Manley praising Dr. Donovan include the following:

³⁵ “Shorenstein Center News Leaders Program, *Shorenstein Center*, <https://shorensteincenter.org/programs/technology-social-change/news-leaders/> (Last accessed Oct. 4, 2023).

³⁶ Copies of Dr. Donovan’s performance evaluations are included at Exhibit “4”.

Joan has brought her remarkable talents, intellect and program to our Center. She is a brilliant unique leader who is building a foundation of work that is having meaningful impact in our country and our world. She has a keen eye for talent and I look forward to working with her to build her project at our Center..

Joan has done an outstanding job as the Director of TaSc and Shorenstein Research Director. Her critical work is having tremendous impact and has lifted the prestige of the Shorenstein Center as well as Harvard Kennedy School. Joan's work as Research Director has improved and enhanced projects in the Center over the past year. Joan is a vital member of the senior leadership team adding strategic guidance when needed.

27. Dr. Donovan began working at the Kennedy School in December 2018 initially on a one-year contract as the Director of TASC.³⁷ The then-Faculty Director brought her on board with assurances that he, and the Kennedy School more broadly, would support her work both financially and administratively. Despite these assurances, Dr. Donovan's formal employment offer was bereft of any funding supporting Dr. Donovan and TASC's researchers or administrators.³⁸
28. Dr. Donovan describes that one of the most challenging things early on during her time at the Kennedy School was doing her own fundraising. Despite this immediate and unexpected challenge, in early 2019 she successfully negotiated a \$700,000 contribution from the Miami Foundation to support the work of TASC. This allowed for Dr. Donovan to pay for researchers, an administrator, and her own salary. Weeks later in April 2019, Nancy Gibbs ("Ms. Gibbs") was appointed to become the new Faculty Director at the Shorenstein Center from her previous post as a professor of the practice at the Kennedy School.³⁹
29. During her employment at the Kennedy School, Dr. Donovan was not only an influential researcher, but she was also a prolific fundraiser. Despite the initial hurdles and challenges of obtaining funding, she successfully secured \$12 million dollars in grants and gifts to fund TASC's work.⁴⁰

³⁷ Correspondence from [NAME REDACTED], Recruitment Consultant to Joan Donovan (dated Nov. 27, 2018), a copy of which is included at Exhibit "5".

³⁸ Donovan Decl. at ¶ 5; Correspondence from former Director, Shorenstein Center on Media, Politics and Public Policy to Joan Donovan (dated July 26, 2018), a copy of which is included at Exhibit "6".

³⁹ Donovan Decl. at ¶ 6; "About the Shorenstein Center," *Shorenstein Center*, <https://shorensteincenter.org/about-us/> (Last accessed Oct. 4, 2023).

⁴⁰ Donovan Decl. at ¶ 6.

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30. Harvard University outlines the policies that differentiate a gift from a grant. According to the University, “no single indicator, by itself, distinguishes a gift from a sponsored project (“grant” or “award”),” and the following factors are typically indicative of a gift:⁴¹
- a. Use of the funds is directly related to the University’s mission
 - b. The donor receives no value, or only nominal value, in exchange for the support provided
 - c. No detailed scope of work, budget, or period of performance is specified by the donor or promised by the University (the general area of work to be supported may be specified)
 - d. There is no line-item budget, nor any restriction on the use of funds (as long as the use is consistent with the donor’s original, accepted, stipulations)
 - e. There is no requirement to return unexpended funds to the donor
31. The following factors are typically indicative of a grant:
- a. A line-item budget for the expenditure of funds for the project Activity
 - b. A detailed statement of the planned Activity or scope of work
 - c. A specified period of performance as a term and condition
 - d. A commitment by Harvard to provide “deliverables” (e.g., products, or periodic technical or progress reports)
 - e. Fiscal accountability, such as submission of financial reports, audit provisions, sponsor prior approval of or control over expenditures, and/or an obligation to return unexpended funds
 - f. Obligation to convey rights to tangible or intangible property resulting from the project (equipment, data, technical reports, copyrightable or patentable materials).
32. Four foundations provided significant financial contributors as grants for the purposes of supporting Dr. Donovan’s work and the TASC team. They are: [redacted as “**Donor A**”], [redacted as “**Donor B**”], [redacted as “**Donor C**”] and [redacted as “**Donor D**”]. Each of the funders outlined key deliverables as well as other critical requirements. Per the grant agreements, key elements of each include, but are not limited to, the following:

⁴¹ FAS Research Administration Services, “Grant v. Gift,” *Harvard University* <https://research.fas.harvard.edu/policies/gift-vs-grant> (last accessed Nov. 6, 2023).

a. Donor A

- i. A grant totaling \$830,000 explicitly supporting TASC.
- ii. Provided to support the project researching coordinated inauthentic activity to promote mis/disinformation that could impact the 2020 US democratic processes including rule of law issues, elections, and the Census.
- iii. Contains a “Key Person Clause” identifying Joan Donovan as such. The clause explicitly states that if Dr. Donovan is no longer part of the project and the Kennedy School fails to find a replacement to the satisfaction of the grantor, then the grantor may withhold further Grant payments to Grantee and/or terminate this Agreement.

b. Donor B

- i. A grant totaling \$700,000 (\$400,000 for the Public Interest Internet Initiative; and \$300,000 for TASC).
- ii. Explicitly names the TASC team as being at the leading edge of theory and methods in this arena and seeks to extend its research beyond looking at digital harms. The grantor will mark progress based on the number of citations of the work, range of publications in academia and the press, and ability to build a field to address public interest on the internet.

c. Donor C

- i. A grant totaling \$800,000 explicitly supporting TASC.
- ii. Provides for grantor being promptly notified if there is a change in the executive director, chief executive officer, president, or comparable senior level executive of the Project and the Center that are the beneficiaries of the grant funds.
- iii. Requires that the grantee repay the grantor any funds spent for purposes that are inconsistent or contrary to the grant agreement or approved budget.

d. Donor D

- i. Grants totaling \$1,150,000

- ii. The most recent grant, totaling \$750,000, was to support the Shorenstein Center’s research on media manipulation tactics and to educate the public about disinformation (intended for TASC).
- iii. Key deliverables/benchmarks include completing a specific number of case studies in the Media Manipulation Casebook, workshops, and publications in academic journals and articles in popular press.

Misuse of [redacted as “Donor E”] Funds

33. **Donor E** provided \$5,000,000 as a “gift” to the Kennedy School. What is notable is that while designated as a gift, the award explicitly specifies the purpose for the gift: funding TASC. The Kennedy School’s Shorenstein Center submitted “A Proposal to **Donor E**,” in which the school detailed a proposal to specifically fund the TASC Research Project.

34. **Donor E’s** gift explicitly states:

The generous gift of \$5,000,000 (the “Gift”) from **Donor E** (the “Donor”) to Harvard University **establishes the current-use Donor E Fund for the Technology and Social Change (TASC) Research Project (the “Fund”).**

35. While paragraph four of the gift agreement does stipulate that “All decisions regarding research and activities supported by the Fund will be made solely at the discretion of Kennedy School, in accordance with its established policies and procedures,” the intent of the gift is clear: to fund TASC. Thus, while the Kennedy School arguably *could* reallocate the funds, it should not do so without consulting **Donor E**. Paragraph six states:

If, at some time in the future, the designation of the Fund is no longer appropriate, the Dean of the Harvard Kennedy School, **in consultation with the Donor**, may direct the Fund to another purpose at the School. **However, if for any reason this consultation cannot occur**, the Dean has the discretion to direct the Fund to a project or purpose deemed to be in keeping with the Donor’s intent.

36. Based on information and belief, the Kennedy School failed to consult **Donor E** about the non-TASC use of funds, including after the decision was made to dismiss Dr. Donovan and shutter TASC. In fact, Dean Elmendorf explicitly and adamantly informed Dr. Donovan that upon the dissolution of TASC, he would “not entertain the notion of giving the funding back to [redacted first name of **Donor E** principal]” (referring to approximately \$3.1 million remaining in the

Harvard coffers for **Donor E** Fund for the Technology and Social Change (TASC) project.)

37. Consistent with the terms of the grants and gifts provided to TASC via the Kennedy School, Dr. Donovan sent monthly updates to funders, illustrating the progress made on projects and informing them of publications, events, media coverage, and new opportunities for supporting research. After Dr. Donovan became the target of Dean Elmendorf's increasing restrictions and deemed to be "persona non grata" to the Dean per her colleagues at Harvard, her media appearances, publishing, and contact with funders ground to a halt.⁴²

Dr. Donovan Lawfully Obtains the Facebook Papers and Facebook's Pressure on the Kennedy School Begins

38. As far back as 2019, Facebook leaders began reaching out to Dr. Donovan because of her work in researching online misinformation and disinformation. Amber Heffernen ("Ms. Heffernen"), who was then with Global Strategic Initiatives at Facebook, asked Dr. Donovan to speak with Facebook employees about online hate issues.⁴³ Later in 2020, Ms. Heffernen invited Dr. Donovan to come to Facebook's headquarters and speak with employees as part of a "fireside chat" about the proliferation of online hate. Throughout 2019-2020, Nathaniel Gleicher, who is currently the Director and Head of Security Policy at Meta, contacted Dr. Donovan and offered to provide Dr. Donovan with an embargoed copy of the company's transparency report on the condition that she would comment to the press about it – ostensibly in a positive light.⁴⁴

39. It became quite apparent to Dr. Donovan that Facebook was, not so subtly, attempting to influence her work, particularly when they offered to create a partnership and "fund" her research or offer to discuss data needs. Accordingly, she declined the offers because of the inherent conflict of interest.⁴⁵

⁴² Donovan Decl. at ¶ 136.

⁴³ Correspondence from Amber Heffernen to Joan Donovan (dated Dec. 15, 2019)(In December 2019, Ms. Heffernen sent an email to Dr. Donovan, requesting to meet the following January about "...connecting more dots with the Shorenstein Center. One of my projects early next half is to start shaping different models for successful academic/research partnerships..."), a copy of which is included at Exhibit "7".

⁴⁴ Donovan Decl. at ¶ 9.

⁴⁵ *Id.*

40. The conflict of interest inherent in accepting funds from social media platforms was explicitly called out by a US Senator with respect to the US Congress's ongoing hurdles to passing platform accountability legislation. On November 7, 2023, during a hearing about Meta's conduct, Senator Lindsey Graham echoed Dr. Donovan's concerns about Facebook corrupting independence and neutrality through significant financial contributions. Senator Graham stated that in order to ensure true independence, he called on fellow Senators and members of Congress to return any money they received from Meta and their subsidiaries:

So I've just asked my office to find out how much money I've received from Facebook, Instagram, and other companies. I'm going to give it back. I think we ought to all boycott the giving because if Senator Hawley is right, I think you are. Their leverage here is just power over the political system. So I'm calling on every member of Congress today, don't take their money until they change.⁴⁶

41. Because of TASC's meaningful work and Dr. Donovan's growing success in bringing new philanthropic interest into the Shorenstein Center, in February 2020 Ms. Gibbs promoted her to Research Director for the entire Shorenstein Center. This was a true honor and, objectively, a tangible accolade for her years of success in restoring and raising the Shorenstein Center's profile in a meaningful way.⁴⁷ At this point, Dr. Donovan and her team were doing relatively well and gaining recognition and credibility throughout the field. Dean Elmendorf sent her messages of praise expressing pride to have her at the Kennedy School.⁴⁸

⁴⁶ Former Meta Executive Testifies on Social Media and Youth Mental Health, *C-SPAN* (Nov. 7, 2023), <https://www.c-span.org/video/?531650-1/meta-executive-testifies-social-media-youth-mental-health> (last accessed Nov. 16, 2023); Transcript: Senate Hearing on Social Media and Teen Mental Health with Former Facebook Engineer Arturo Bejar, *Tech Policy Press*, (Nov. 7, 2023), <https://techpolicy.press/transcript-senate-hearing-on-social-media-and-teen-mental-health-with-former-facebook-engineer-arturo-bejar/> (last accessed Nov. 16, 2023).

⁴⁷ Donovan Decl. at ¶ 7; see Shorenstein Center-wide Announcement of Joan Donovan's Promotion to Research Director of Shorenstein Center from Nancy Gibbs, Director, Shorenstein Center on Media, Politics and Policy (dated Mar. 24, 2020), a copy of which is included at Exhibit "8".

⁴⁸ Donovan Decl. at ¶ 15 (Previously Dean Elmendorf's communications with me were full of praise. For example on August 8, 2019 he wrote in an email: "Hi Joan, I hope your summer has been going well – and that you've had some time for relaxation alongside all the wonderful work you've been doing. I'm so pleased to see the difference you're making in the way that news is reported and information is conveyed. I think you're working at such a fascinating and crucial intersection of technical challenges and human challenges, and I eagerly await your steps forward. I would be happy as a citizen for you to be doing this work anywhere, but as the HKS dean, I am especially happy for you to be doing this work with Nancy and others here. Thanks for that! Best, Doug").

-
42. However, everything changed dramatically after Ms. Haugen’s lawful disclosure concerning Facebook’s activities was made public on September 13, 2021, and Dr. Donovan came into lawful possession of what is commonly referred to as the “Facebook Papers” or the “Facebook Files”, files that Ms. Haugen lawfully disclosed to federal regulators and Congress.⁴⁹
43. Ms. Haugen’s disclosure was a watershed moment for social media not only within Meta (then-Facebook), but among the mainstream media, researchers, advocacy groups, and policymakers globally. Given the issues that it touched upon, be it teen mental health or global security, her disclosure was a top news story for many weeks. In fact, Ms. Haugen and her testimony before the U.S. Senate made the evening news for many nights straight.
44. On September 10, 2021, just three days prior to the public reporting on Ms. Haugen’s disclosure, Dr. Donovan was invited to speak before the Kennedy School’s “Dean’s Council” which she accepted as an honor.⁵⁰ The Dean’s Council is composed of members that “...provide financial support and practical advice that allow the School to advance positive change...”⁵¹ Given the timing of her speaking engagement, Ms. Haugen’s disclosure was the top discussion point. The Facebook Files were leading the news cycle for more than a month by the time of that fateful Dean’s Council meeting.
45. On October 29, 2021, Dr. Donovan spoke before the Dean’s Council as planned. Ms. Gibbs acted as the host and interviewed Dr. Donovan about media manipulation, disinformation, journalism, and democracy. The event was scheduled to last an hour and was split into two parts. The first 45 minutes were devoted to Dr. Donovan discussing technology and disinformation impact on democracy with Ms. Gibbs, while the last 15 minutes were devoted to audience questions. Ms. Gibbs opened with questions about the Facebook Files. At that moment, Dr. Donovan was one of the only researchers in the world who had access to the documents – a fact she stated during this event. Moreover, Dr. Donovan noted that these documents are the “most important documents in

⁴⁹ Donovan Decl. at ¶ 25; See Jeff Horwitz, “Facebook Says Its Rules Apply to All. Company Documents Reveal a Secret Elite That’s Exempt.,” *The Wall Street Journal*, Sept. 13, 2021, <https://www.wsj.com/articles/facebook-files-xcheck-zuckerberg-elite-rules-11631541353> (Last accessed Oct. 20, 2023).

⁵⁰ Donovan Decl. at ¶ 11.

⁵¹ “Dean’s Council.” *Harvard Kennedy School*, <https://www.hks.harvard.edu/more/about/transparent-engagement-and-funding/advisory-councils/dean-s-council> (Last accessed Oct. 4, 2023).

internet history.”⁵² During the talk, she raised the same concerns about Facebook’s impact on democracy that were then being discussed in the mainstream press by Dr. Donovan and others;⁵³ her comments and concerns were not in any way out of the ordinary.⁵⁴

46. While the discussion started off professionally, one audience member became increasingly and visibly agitated. Dr. Donovan describes what happened, writing:

As Ms. Gibbs was interviewing me, one member of the Dean’s Council, Elliot Schrage, **the Former Head of Communication for Facebook^[55] and, from my experience, he is known in the misinformation research community as Facebook’s "fixer" within academia**, became increasingly and visibly agitated. During the interview portion of the meeting, Mr. Schrage was rocking in his chair in a visibly agitated manner and raised his hand several times attempting to interject during the discussion. Throughout the audience questions portion of the event, Mr. Schrage monopolized the discussion by accusing me that my reading of the documents was inaccurate and that he disagreed with all prior discussion about Facebook. **I tried to answer Mr. Schrage’s allegations, but he kept speaking out angrily. Eventually, [REDACTED], a member of the Dean’s Council who introduced the session, had to intervene. Mr. Schrage’s conduct was so overwhelming and disruptive that [REDACTED] was forced to raise her voice in an attempt to try and calm Mr. Schrage. It was tense, awkward, and embarrassing for everyone involved.**⁵⁶

47. Following the Dean’s Council event, the member of the Dean’s Council who intervened to calm Mr. Schrage – also, a major financial supporter of Dr. Donovan’s work – contacted Dr. Donovan both by email and text message and asked if she was okay following Mr. Schrage’s visceral reaction to Dr. Donovan’s

⁵² Donovan Decl. at ¶ 12.

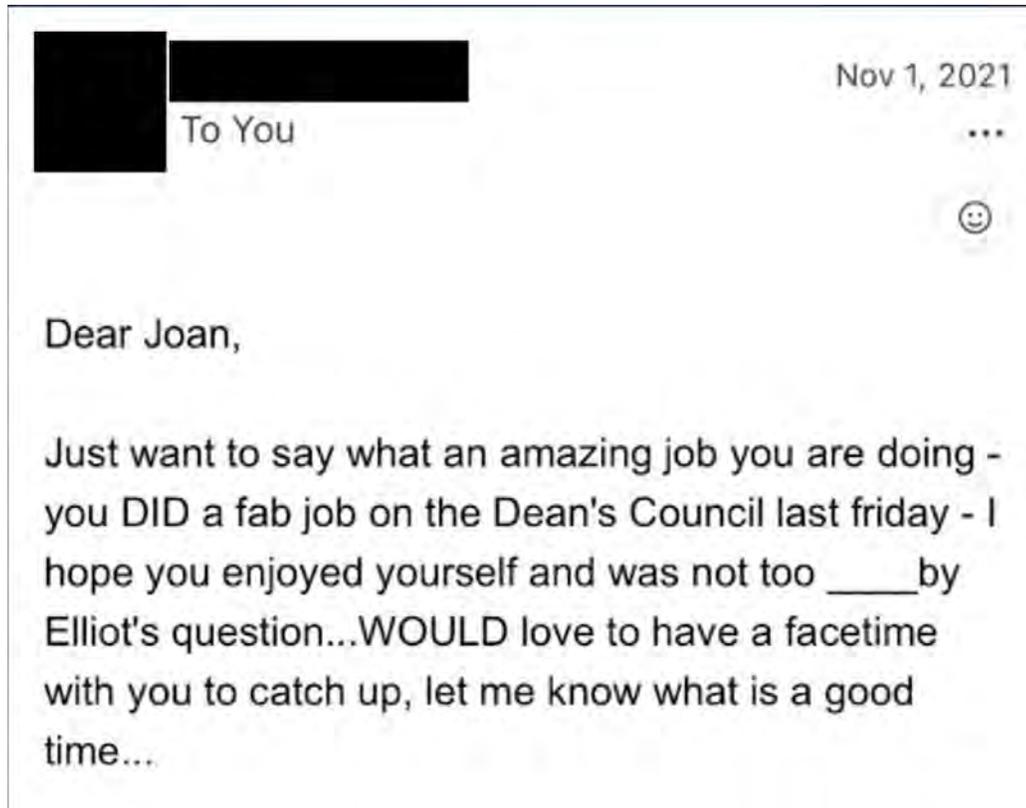
⁵³ Approximately a week before the Dean’s Council meeting, dozens of articles were published discussing Ms. Haugen’s disclosures. “Broken Code”, Jeff Horwitz 298 (2023).

⁵⁴ Donovan Decl. at ¶ 12.

⁵⁵ Kurt Wagner, “Facebook’s Policy Chief Quit Last Year. He Still Hasn’t Left.”, *Bloomberg*, (Sept. 17, 2019), <https://www.bloomberg.com/news/articles/2019-09-17/facebook-s-policy-chief-quit-last-year-he-still-hasn-t-left>, (Last accessed Nov. 20, 2023).

⁵⁶ Donovan Decl. at ¶ 13 (emphasis supplied); NOTE: based on information and belief, the Dean’s Council meeting was recorded, a copy of which is presumably maintained by the Kennedy School.

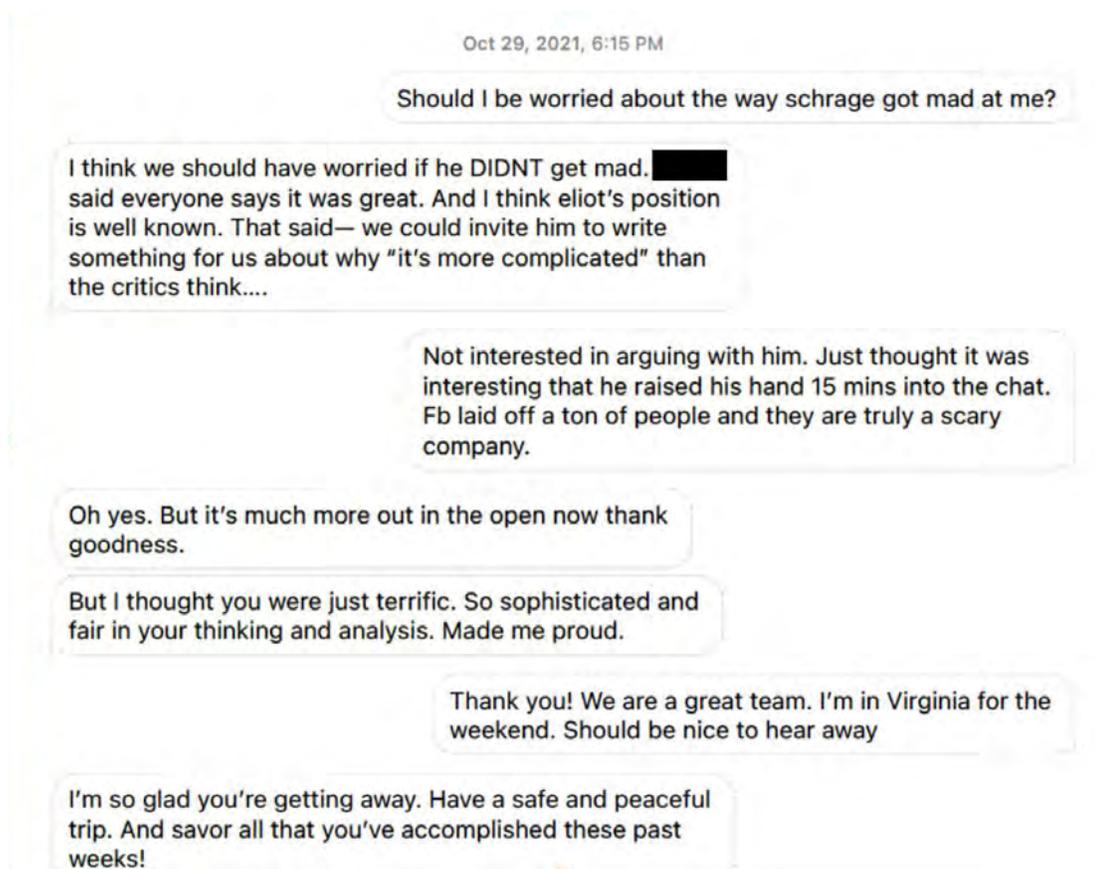
presentation, which shocked and horrified many there. The Dean’s Council member wrote.⁵⁷



48. Dr. Donovan was so concerned about Mr. Schrage’s conduct that she texted Ms. Gibbs.⁵⁸

⁵⁷ Text message from the Dean’s Council member to Dr. Donovan (Nov. 1, 2021), See Email correspondence from the Dean’s Council member to Joan Donovan, *NOV 1 2021 - You are my Super Hero :!!!!*, (Nov. 1, 2021, 6:55 p.m.), a copy of which is included at Exhibit “9”.

⁵⁸ Donovan Decl. at ¶ 14; Screenshot of text correspondence between Nancy Gibbs and Joan Donovan (dated Oct. 29, 2021), a copy of which is included at Exhibit “10”. Ms. Gibb’s messages are aligned left, Dr. Donovan’s messages are aligned right.



49. On November 8, 2021, Dr. Donovan received an email from Dean Elmendorf in which he opened by referencing the Dean's Council discussion from the week prior. He asked to schedule a time to meet with Dr. Donovan and others, including other deans, to discuss her research. When Dean Elmendorf had previously communicated with Dr. Donovan, he would ask about her research, in general. However, here the dean was laser focused. He specifically noted that he was not as interested to learn about her overarching research, but rather specific questions arising from the Dean's Council meeting.⁵⁹ Dean Elmendorf wrote:

- How you define and measure the problem of misinformation that shows how the current situation is different from (or similar to) misinformation in earlier eras?
- How you define the problem of misinformation for both analysis and possible responses (algorithm-adjusting or policy-making) **when there is no**

⁵⁹ Donovan Decl. at ¶ 15.

independent arbiter of truth (in this country or others) and Constitutional protections of speech (in some countries)? I don't mean the mechanics, but the principles; for example, how could one decide when objections against vaccines are okay or not okay, when rejection of human-caused climate change is okay or not okay, etc.

- How the research you're conducting provides a basis for comments you're making about current events. I understand why Nancy started with the news about Facebook, **but someone pointed out to me** that very little that has appeared in the Misinformation Review seems to be about Facebook, which makes me wonder how the current state of research on misinformation does (or doesn't) overlap with interest on the outreach side.⁶⁰

50. Over the years Dr. Donovan has seen how Meta/Facebook exerts its influence over the field of research, particularly within the media landscape at large.⁶¹ Thus, based on her knowledge, experience, and familiarity with the company, and because she possessed the Facebook documents, Dr. Donovan believed someone from Meta/Facebook was influencing the Dean. She concluded this because **the very rebuttal points Meta/Facebook uses to protect its interests against oversight and regulation were reflected in Dean Elmendorf's email**. Dr. Donovan writes:

When I read this email from Dean Elmendorf, it was obvious to me that Facebook, either directly or through intermediaries, was communicating with him about my research. It became apparent very quickly that Dean Elmendorf was being told Facebook's position on my **team's research and my interviews in the media concerning Facebook. I thought the agitation demonstrated by Mr. Schrage based on the confluence of my disinformation research, my receipt of the entire contents of Frances Haugen's cache of internal Facebook documents, and my view of the significance of these documents was likely shared by Meta leadership and former leadership who were close to the Dean. What struck me as particularly notable was his use of the phrase "arbiters of truth". This phrase had become a meme among**

⁶⁰ Donovan Decl. at ¶ 15 (emphasis supplied); see Email correspondence from Doug Elmendorf to Joan Donovan and Nancy Gibbs, Re: misinformation, (Nov. 8, 2021, 7:23 a.m.), a copy of which is included at Exhibit "11".

⁶¹ Dr. Donovan has long been studying and writing about the role of Facebook in the information ecosystem; See Joan Donovan, "Extremists Understand What Tech Platforms Have Built," *The Atlantic*, Mar. 17, 2019, <https://www.theatlantic.com/ideas/archive/2019/03/extremists-understand-what-tech-platforms-have-built/585136/> (Last accessed Oct. 4, 2023).

misinformation researchers because Facebook public relations reiterated it so often. Moreover, at that time Facebook was also pushing the idea that the words "misinformation" and "disinformation" were too ill defined to be enforced – so his questions matched Facebook’s public narrative. For example, Facebook advocated using the phrase "real-world harm" in place of the word "incitement" in an attempt to redefine and reset the dialogue and the research around social media impact more broadly – distancing themselves from any responsibility for the consequences of their decisions.⁶²

...

I was also wary of Mr. Schrage because of media reports and discussions amongst colleagues that worked closely with Mr. Schrage on the Social Science One project for using media manipulation as part of his job.⁶³ For example in 2018, CNBC reported that Mr. Schrage tasked a politically-affiliated public relations firm to push negative narratives about Facebook's competitors, namely Apple and Google.⁶⁴ After Dean Elmendorf’s email on November 8, 2021, I believed Mr. Schrage, and likely others, were using the same approach against me and my team. Further, I had been warned by other faculty at Harvard and other universities that Mr. Schrage and Sheryl Sandberg, former COO of Facebook, were particularly strategic when influencing academia, the media, and their powerful peers.⁶⁵

51. Mr. Schrage is far from the only individual with direct ties to Dean Elmendorf with the capability of exerting influence. In 2021, Sheryl Sandberg (“Ms.

⁶² Donovan Decl. at ¶ 16 (emphasis supplied); Elmendorf to Donovan and Gibbs, included at Exhibit “11”, at 1-2; Tom McCarthy, “Zuckerberg says Facebook won’t be ‘arbiters of truth’ after Trump threat”, *The Guardian*, (May 28, 2020), <https://www.theguardian.com/technology/2020/may/28/zuckerberg-facebook-police-online-speech-trump> (Last accessed Oct. 19, 2023).

⁶³ Craig Silverman, “Exclusive: Funders Have Given Facebook A Deadline To Share Data With Researchers Or They’re Pulling Out,” *Buzzfeed News* (Aug. 27, 2019), <https://www.buzzfeednews.com/article/craigsilverman/funders-are-ready-to-pull-out-of-facebooks-academic-data> (Last accessed Oct. 19, 2023).

⁶⁴ Saheli Roy Choudhury, “Facebook’s outgoing communications head reportedly takes the blame for hiring controversial PR firm,” *CNBC*, (Nov. 21, 2018), <https://www.cnbc.com/2018/11/21/facebook-elliott-schrage-takes-the-blame-for-hiring-definers-pr-firm.html> (Last accessed Oct. 19, 2023).

⁶⁵ Donovan Decl. at ¶ 18; Dr. Donovan responded to Dean Elmendorf’s email in detail, a copy of which is included at Exhibit “11”.

Sandberg”) was the Chief Operating Officer of Facebook. Over twenty five years prior in 1991, she attended Harvard University and Dean Elmendorf was her undergraduate advisor and the faculty advisor of the “women in economics” club she founded. While that decades-long connection in and of itself is not indicative of strong ties, Dr. Latanya Sweeney (“Dr. Sweeney”), Dr. Donovan’s colleague, told Dr. Donovan about how close the two continue to be, and even expressed her concern about the strength of that connection. Dr. Donovan writes:

Moreover, faculty colleagues at Harvard also informed me that Mr. Schrage and Sheryl Sandberg, former COO of Facebook, both had close personal relationships with Dean Elmendorf as donors and alumni. Notably, I was aware that Dean Elmendorf was Sheryl Sandberg’s undergraduate advisor in 1991⁶⁶ and continues to maintain a close relationship with her.⁶⁷

. . . Dr. Sweeney once told me that she had attended a dinner at Ms. Sandberg’s home along with Dean Elmendorf, just prior to the start of the pandemic. She was so struck by the closeness of their decades-long friendship that she confided in me her own concerns about Dean Elmendorf’s close, personal relationship with Ms. Sandberg and the potential conflict of interest with the work we were doing. Dean Elmendorf would go on to attend Sheryl Sandberg’s wedding on August 20, 2022 in Wyoming, where he was photographed by People Magazine.⁶⁸

52. News of Dean Elmendorf attending Ms. Sandberg’s wedding is an incontrovertible fact. On August 22, 2022, *People Magazine* published a photograph of Ms. Sandberg’s wedding, as seen here.⁶⁹

⁶⁶ Brandon J. Dixon, “Leaning In from Harvard Yard to Facebook: Sheryl K. Sandberg ’91”, *The Harvard Crimson*, (May 24, 2016), <https://www.thecrimson.com/article/2016/5/24/Sheryl-Sandberg-profile/> (Last accessed Oct. 29, 2023).

⁶⁷ Donovan Decl. at ¶ 20; Robert F. Worley, “Leaning In from Harvard Yard to Facebook: Sheryl K. Sandberg ’91”, *The Harvard Crimson*, (May 24, 2016), <https://www.thecrimson.com/article/2016/5/24/Sheryl-Sandberg-profile/> (Last accessed Oct. 19, 2023).

⁶⁸ Donovan Decl. at ¶ 21 (emphasis supplied).

⁶⁹ Charlotte Triggs and Maria Pasquini, *See All of the Photos from Sheryl Sandberg’s Dreamy Weekend Wedding to Tom Bernthal*, *People Magazine*, (Aug. 22, 2022), <https://people.com/human-interest/all-the-photos-from-sheryl-sandberg-weekend-wedding-to-tom-bernthal> (Last accessed Oct. 11, 2023).



53. Dean Elmendorf is circled in the above image, underscoring their particularly close, personal relationship. **Just four days after this picture was taken, on August 24, 2022, Dean Elmendorf informed Dr. Donovan that he was shutting down her research team and would not honor her employment contract.**⁷⁰

54. A senior Facebook executive was given permission to audit Dr. Donovan's course in September 2020. Dr. Donovan has come to the conclusion that based on his behavior, that individual was also there to monitor her class on Facebook's behalf. This concern was not unwarranted. Dr. Donovan describes the tactics that Facebook, and the Head of Public Policy, Canada, specifically, has used to try and manipulate independent research. She describes not only how the company expects universities and researchers to treat them well when their dollars are used to finance research, but also how the company unleashes attacks in retaliation when those researchers are critical of Meta. Dr. Donovan writes:

⁷⁰ Donovan Decl. at ¶ 21.

. . . I was well aware that Facebook had a history of offering financial support to researchers that came with expectations, examples include Dr. Hany Farid from University of California Berkeley and Dr. Taylor Owen from McGill University. **Dr. Farid told me that he had to return over a million dollars to Facebook after he was contacted by a Meta executive following some critical, but honest, comments made by Dr. Farid to the media. Dr. Owen, a professor of public policy and researcher of disinformation had a different but equally uncomfortable experience, where Kevin Chan, a prominent Facebook executive in Canada was appointed as an advisory board member of the Max Bell School of Public Policy at McGill University. Mr. Chan took it upon himself to use an advisory board meeting to disparage Dr. Owen and his research as it pertained to Facebook. Mr. Chan, then, requested that the school "fact-check" their tweets about Owen's research and not to promote his research from their own Twitter account.** It was clear that what Mr. Chan found objectionable was not factual errors, but rather the divergence of Dr. Owen's research findings and Facebook's public narratives. Mr. Chan also offered funding for a journalism program at McGill, but the funding was turned down after Dr. Owens intervened to explain that Meta funding journalism programs presented a conflict of interest.⁷¹

55. Meta has a history of bullying not just individuals, but foreign governments, to bend to their will. For example: in 2021 Facebook executed what is colloquially known as the "Australia Takedown," where the company prevented Australian news from being shared on the platform ahead of a nationwide vaccine rollout and in the midst of the bushfire season. Facebook took this action to force the Australian Parliament to stop pending legislation that the company viewed as threatening its business model.⁷² In fact, internal company documents reveal that Mr. Zuckerberg, Ms. Sandberg, and Campbell Brown, then-Facebook's head of partnership, viewed the strong-arm approach as successful. Mr. Zuckerberg congratulated colleagues, writing:

This is something we'd been preparing for, but the last couple of weeks were intense . . . We were able to execute quickly and take a principled approach for

⁷¹ Donovan Decl. at ¶ 10 (emphasis supplied).

⁷² Keach Hagey, et al., "Facebook Deliberately Caused Havoc in Australia to Influence New Law, Whistleblowers Say," *The Wall Street Journal*, May 5, 2022, <https://www.wsj.com/articles/facebook-deliberately-caused-havoc-in-australia-to-influence-new-law-whistleblowers-say-11651768302> (Last accessed Oct. 4, 2023).

our community around the world, **while achieving what might be the best possible outcome in Australia.**⁷³

56. Ms. Sandberg wrote her colleagues:

We landed exactly where we wanted to . . .⁷⁴

57. Ms. Brown, who according to The Wall Street Journal pressed for the company's aggressive stance, **sent a congratulatory email to her team only minutes after the Australian Senate voted to approve the "watered-down bill."**⁷⁵ She wrote:

The thoughtfulness of the strategy, precision of execution, and ability to stay nimble as things evolved **sets a new high-standard.**⁷⁶

58. In using strong-arm tactics against the Australian government, Facebook got what it wanted – special concessions. Furthermore, because this hard-line approach worked, they repeated this tactic with the Canadian government later in 2023 where, per *The New York Times*, "A Canadian law that will require tech companies to compensate domestic publishers has led Meta to start blocking news articles on its social networks".⁷⁷ Accordingly, it would not be difficult for Facebook to effectively engage in a full-court press of Dean Elmendorf, the Kennedy School, and even Harvard University more broadly, to minimize any research that may, in Facebook's view, harm their interests. Moreover, they are certainly not above using both a carrot and stick approach simultaneously, which is effectively the tactic they employed in this case.

⁷³ Josh Taylor, "Deliberate ploy: whistleblowers reveal why Facebook's Australia news ban included non-news sites," *The Guardian*, May 28, 2022, <https://www.theguardian.com/technology/2022/may/29/deliberate-ploy-whistleblowers-reveal-why-face-books-australia-news-ban-included-non-news-sites> (Last accessed Oct. 4, 2023)(emphasis supplied).

⁷⁴ Keach Hagey, et al., "Facebook Deliberately Caused Havoc in Australia to Influence New Law, Whistleblowers Say," *The Wall Street Journal*, May 5, 2022, <https://www.wsj.com/articles/facebook-deliberately-caused-havoc-in-australia-to-influence-new-law-whistleblowers-say-11651768302> (Last accessed Oct. 4, 2023)(emphasis supplied).

⁷⁵ *Id.*

⁷⁶ *Id.* (emphasis supplied).

⁷⁷ Vjosa Isai, "Missing From Your Facebook News Feed: Canadian News," *The New York Times*, Aug. 3, 2023, <https://www.nytimes.com/2023/08/03/world/canada/meta-facebook-news-feed-removed.html> (last accessed Nov. 16, 2023).

59. By this time, Dr. Donovan not only had access to the Facebook Files, but she was working with Dr. Sweeney and Ms. Manley, the Executive Director of Shorenstein Center, to record and publish the documents for the public project that became known as the FB Archive.⁷⁸ As the team prepared for a meeting with Kennedy School leadership, Dr. Donovan wrote an email to Dr. Sweeney, Ms. Manley, and others alerting them to Dean Elmendorf’s email, writing:

Just a heads up, Nancy I got an email this morning from the Dean asking very specific questions about Facebook and how the research at TASC is conducted. **At the deans council meeting Elliot Schrage was very angry with me and now the Dean wonders how we can assess misinformation when no one is “an arbiter of truth.” So, they did go to the Dean after that council meeting. This is really going to bring the heat.**⁷⁹

60. Given the anticipated difficulties with Meta/Facebook, the known sensitivity Dean Elmendorf had to any work related to Meta/Facebook, and Harvard establishing the Facebook Archive, both Ms. Manley and Dr. Sweeney suggested taking Dr. Donovan’s name off the public communications on the project so as not to agitate Dean Elmendorf. In response to Dr. Donovan’s email, Dr. Sweeney addressed this in writing, in pertinent part:

Let’s remove the explicit listing of TASC, minimally, or of all three groups, when the website updates later today. No reason to put a target on the project that allows FB to claim bias before we even do anything. Otherwise, we have to deal with their discrediting campaign before we can even launch. We can still include logos for the Tech Lab and the Data Privacy Lab. **Doing so may reduce the heat.** Just throwing this out as a possibility.⁸⁰

61. Despite this warning, Dr. Donovan still believed that because academic freedom is part and parcel to conducting meaningful research within Harvard University, as stated in the University-Wide Statement on Rights and Responsibilities, TASC

⁷⁸ See Technology and Social Change Project, et. al. *fbarchive.org*, <https://fbarchive.org/>, (Last accessed Oct. 4, 2023).

⁷⁹ Email correspondence from Laura Manley to Latanya Sweeney, Joan Donovan, [NAME REDACTED], and Nancy Gibbs, *Re: fbarchive.org*, (Nov. 8, 2021, 8:35 a.m.), a copy of which is included at Exhibit “12”; Donovan Decl. at ¶ 23 (emphasis supplied).

⁸⁰ Email correspondence from Laura Manley to Latanya Sweeney, Joan Donovan, [NAME REDACTED], and Nancy Gibbs, *Re: fbarchive.org*, (Nov. 8, 2021, 8:35 a.m.), a copy of which is included at Exhibit “12”; Donovan Decl. at ¶ 24 (emphasis supplied).

should not suffer any consequences.⁸¹ Unfortunately, that would not be the case.

The Campaign to Shut Down TASC and Minimize Dr. Donovan

62. In January 2022, Dr. Donovan attended a meeting with Kennedy School leadership to discuss the questions raised by Dean Elmendorf in his November email. The meeting was delayed as Dr. Donovan was ill with COVID-19. The meeting included, among others, Dean Elmendorf, Dr. Sweeney, Ms. Manley, and Ms. Gibbs. Dean Elmendorf wanted to know more about how Dr. Donovan and her team conduct their research. Dr. Donovan attempted to explain their research and methods using case studies published on mediamanipulation.org, but Dean Elmendorf repeatedly interrupted her answers asking for less detail. Dr. Donovan tried to explain to him that given the nature of misinformation and disinformation, discussing case studies is the best way to articulate the methodologies and findings of TASC's research, but to Dr. Donovan, it seemed like Dean Elmendorf was "digging in an effort to poke holes in the work."⁸² After the meeting, Dean Elmendorf provided feedback to Dr. Sweeney – rather than to Dr. Donovan. Dr. Sweeney told Dr. Donovan to enhance the methodology section of the "Casebook methods webpage." Dr. Donovan made those adjustments and Dr. Sweeney passed this information on to the Dean.⁸³ There was no further follow up.

63. Dr. Donovan began feeling "alarmed" because things began to change in a very real way beginning with the November 8th email from the Dean. After the holidays beginning in January 2022, the Kennedy School starved TASC of personnel, and the grants management process ground to a halt.⁸⁴ In late June 2022, she learned about a grant of \$5 million from [redacted as "**Donor G**"], a champion of her work. **Donor G** told Dr. Donovan that she was proud to be supporting Dr. Donovan's research at the Shorenstein Center and invited Dr. Donovan to New York City for dinner. **Donor G** underscored how "excited" she was about funding Dr. Donovan's research about misinformation, an issue that **Donor G** believes is critical for democracy and national security.

⁸¹ Donovan Decl. at ¶ 27.

⁸² Donovan Decl. at ¶ 32.

⁸³ Donovan Decl. at ¶ 33; Email correspondence from Latanya Sweeney to Joan Donovan and Nancy Gibbs, *Way forward with Doug*, (Jan. 20, 2022, 2:10 p.m.), a copy of which is included at "Exhibit 13".

⁸⁴ Donovan Decl. at ¶ 34.

64. Surprised to hear about this substantial gift, Dr. Donovan reached out to Ms. Manley and Ms. Gibbs and scheduled a Zoom meeting to discuss the news. The tone of the conversation was a marked shift from her prior interactions with them, and Dr. Donovan describes what happened during the Zoom meeting, writing:

. . . Ms. Gibbs became very angry with me and asked me if I thought I deserved this money after all the center has done for me. She accused me of having "raised a center in the middle of Shorenstein." I pointed out that I was trying to gain clarity on this specific gift. She then alleged that I had misrepresented my research to funders because I had solicited funding for the same project across multiple foundations. I was shocked by her accusations and seeming lack of awareness that coalition-style funding is preferred by many foundations – particularly for significant research projects. I explained that the funders understand that they are contributing to a large research project called "Casebook", and that all the funders names are listed on the website. In fact, it was the foundations themselves who encouraged me to seek funding in this collaborative way. I reiterated that I was seeking transparency on this particular gift as it was relevant to the fundraising I do for my team.⁸⁵

65. On August 24, 2022, Dr. Donovan was summoned to a one-on-one meeting with Dean Elmendorf. During this 45-minute meeting, Dean Elmendorf laid out his affirmative steps to shut down TASC and Dr. Donovan's work. Tellingly, Dean Elmendorf told Dr. Donovan that had her team been "smaller" and the impact of her work less significant, he could "ignore" her. Dr. Donovan writes:

. . . [Dean Elmendorf] informed me that at his direction and supported by Nancy Gibbs and Laura Manley, the Kennedy School will be "winding down TASC". He told me in no uncertain terms that if my team were smaller, he could "ignore" us. However, he continued, because I had become "too prominent", he had to "wind it down". He said he was not going to approve any expenditure or hire that "increased my public profile." He stipulated that I could (a) not start any new projects, (b) hire new people unless I lost people from my team, and (c) that I could no longer fundraise. As a direct result of these restrictions, I was not going to be able to raise any funding for the FB Archive, hire new staff to conduct research within the archive, or conduct workshops to teach others how to navigate the archive.

⁸⁵ Donovan Dec. at ¶ 66.

He said there was an HKS policy in the faculty handbook that said "only tenured faculty can run projects." It was common knowledge at Harvard and at many other Universities that this rule could be waived by the Dean – and in fact in numerous prior fully executed grant agreements, I was clearly named as the director of the projects proposed. He informed me that he would support me transitioning to another position outside the university, but he specifically stated that he would "not entertain the notion of giving the funding back to [the first name of Donor E's Principal]" (emphasis added). At that time, I had approximately \$3.1 million dollars in gift funding from [Donor E] in an account operated by Harvard. Dean Elmendorf told me that if I left Harvard, an action he supported, [Donor E's] gift funding would remain at HKS because it was the property of the presidents and fellows of Harvard.

...

I asked Dean Elmendorf what had changed in my relationship with HKS. I said I was hired as project director and had up to that point been freely allowed to operate managing my projects with Dr. Latanya Sweeney as my co-principal investigator (a designation that allows for the management of grants.). As I sat at his table sobbing, he briefly deviated from his script to explicitly say in a patronizing manner, "I want you to know that you do not have academic freedom." I asked, "what was that supposed to mean?" He replied, "I want to remind you that you're staff here."

At that moment, I recalled the prior sequence of events beginning with the Dean's Council meeting when Elliot Schrage became enraged over my statements and possession of the Facebook Files. The email from the Dean shortly thereafter where he questioned my methodology for the first time, specifically focused on Facebook, the announcement of Harvard's largest gift ever from the Chan-Zuckerberg Foundation, which must have been months in the works, the consistent concerns by my colleagues to frame anything that may upset Facebook in ways that could appease the Dean and my colleague's surprise and concern upon discovering how very close a relationship the Dean maintained with Sheryl Sandberg. I realized he must mean that he would no longer allow me to do any work given the possibility my work could upset Facebook. Dean Elmendorf would starve my team of staff, funding and bureaucratic approvals to control what we could do at HKS and if Facebook decided to sue over the FB Archive project that Dean Elmendorf was not going to protect me in any way – least of all any academic freedom I thought I had at HKS. At that moment, I was intimidated into submission and I was afraid for my team, my career and my family since the Dean was clear that he would not

hesitate to use any avenue he could to control and silence me and the entire TASC team.

...

I did ask him if Ms. Gibbs and Ms. Manley knew about this decision, to which he replied they supported this decision. I told him that I hoped to move my team to another center, outside of HKS, so that I could continue working with my team and using my funding. He asked which centers, and in complete candor, I told him I was already in conversations with the Berkman Klein Center at Harvard Law School and Latanya Sweeney had mentioned moving TASC to her Data Privacy lab in the Institute for Quantitative Social Sciences (IQSS).

I tried to stress to Dean Elmendorf that my mission was the same as that presented publicly by Harvard University: "to share the light with the world." When he took aim at diminishing my public reputation, he was really preventing public access to TASC research and obstructing the fundamental academic right to inquiry.

What I found particularly threatening and resolute of the Dean's intentions was that he concluded the meeting by saying, "**If anyone can come back from this, my bet is Joan Donovan.**" To me, that underscored the gravity of the action they were taking against me.⁸⁶

66. Despite being told that she would have to wind down TASC by June 2024, Dr. Donovan anticipated retaliatory actions in an effort to stifle TASC's research and to make her more ignorable. She contacted Human Resource officials to learn about her rights and explored whether it would be feasible to move TASC out of the Shorenstein Center and to another center at Harvard.⁸⁷ Dr. Donovan describe her efforts, writing:

Throughout the fall of 2022 I had numerous meetings with staff and faculty associated with BKC. In one meeting in October 2022 with Mr. Zittrain, we devised a plan to have a BKC affiliated faculty member and tenured anthropology professor, [Name Redacted], serve as PI on TASC, and move the management of the team and resources into BKC. I worked diligently throughout the fall to make this work, including six meetings with the collaborating Professor. The idea to move to BKC was stopped following a Crimson article on

⁸⁶ Donovan Decl. at ¶¶ 100-101, 104 - 105, 107-109 (emphasis supplied).

⁸⁷ Donovan Decl. at ¶ 119.

February 2, 2023 with the headline, "Harvard Misinformation Expert Joan Donovan Forced to Leave by Kennedy School Dean, Sources Say."⁸⁸ **Ms. Hendrickson, the Executive Director of the Berkman Klein Center for Internet and Society, told me on a Zoom call that given how relatively new she was that she did not have the "political capital" to bring on someone that Dean Elmendorf had "targeted."⁸⁹**

67. Moreover, Dr. Donovan learned that Dean Elmendorf contacted the Berkman Klein Center's faculty director and told him that Dr. Donovan had "bragged" about moving to the Berkman Klein Center – which was patently false, meaning that such a statement by Dean Elmendorf was made solely to improperly influence a third party. Dr. Donovan describes this writing:

Following the August 24th meeting with Dean Elmendorf, I spent time trying to find a new place within Harvard University where TASC can continue at either the Berkman Klein Center or the Institute for Quantitative Social Science. For context, back in July 2022, I met with the Berkman Klein Center's relatively new director, Sue Hendrickson, and we discussed the challenges I had with the Kennedy School. During that meeting, she told me that she would support having TASC move to the Berkman Klein Center. During a meeting with Jonathan Zittrain in October 2022, I subsequently learned that Dean Elmendorf reached out to Jonathan Zittrain, the Faculty Director of BKC and Dean John Manning, the Dean of the Harvard Law School, and this stalled the progression of TASC moving to BKC. Mr. Zittrain said that Dean Elmendorf said I "bragged" to him that I was "leaving for BKC." Never did I display such a flippant attitude towards Dean Elmendorf. From this, I realized that Dean Elmendorf was sabotaging my efforts to stay at Harvard and deliberately alienating me from colleagues.⁹⁰

68. On August 25, 2022, which was the day after the meeting with Dean Elmendorf, where he told Dr. Donovan that her time at the Kennedy School was coming to a close, Dr. Donovan received notes memorializing a FB Archive meeting from earlier that day, which she was unable to attend. Present at the meeting were Dr. Sweeney and Ms. Manley, among others. The notes reflect a discussion among

⁸⁸ Miles J. Herszenhorn, "Harvard Misinformation Expert Joan Donovan Forced to Leave by Kennedy School Dean, Sources Say", *The Harvard Crimson*, (Feb. 2, 2023), <https://www.thecrimson.com/article/2023/2/2/donovan-forced-leave-hks/> (Last accessed on Oct. 19, 2023).

⁸⁹ Donovan Decl. at ¶ 138 (emphasis supplied).

⁹⁰ Donovan Decl. at ¶ 132.

the team members whether and how to provide Facebook with an overview of the archive and the contents and reflect, in pertinent part, the following:⁹¹

Latanya: attempting to identify former/current Meta employees who are at Harvard this year.

- [REDACTED] (former Meta employee)
 - Laura suggests bringing her in to hear the (former) talking points.
- Laura: Benefit to Elliot Schrage looking at it?
 - Latanya: Might ask if he'd like a private demonstration after the FB review.
 - Laura: Depends on how confident we feel about the platform.
 - Latanya: Cheryl Sandberg?
 - [REDACTED] What's the implication if Doug gets his feathers ruffled by Eliot?
 - Laura: Is there a way to do a demo for Elliott after the trigger has been pulled on the archive?
 - [REDACTED] Are there other companies that we could ask to back up our argument that FBarchive is useful and helpful for Facebook?
 - LinkedIn?
 - AirBNB?
 - Laura: What about people in government?
 - Latanya: [REDACTED] (FTC Commissioner)
 - Laura: public statement?

69. While it can be argued that it would not be completely unreasonable for the University to try and manage Facebook's expectations and reactions given the significance of the project, what is absolutely concerning is that an attendee explicitly referenced the concern that Dean Elmendorf would have his "feathers ruffled" by Mr. Schrage. Accordingly, this is not about managing Facebook's expectations; it's about managing Dean Elmendorf's reaction and his protective stance with regards to Facebook/Meta.

70. Based upon Mr. Schrage's conduct at the Dean's Council meeting and the above meeting notes, it is clear that Mr. Schrage was not only capable of exerting significant pressure on Dean Elmendorf, he was likely part of a full-court press by Facebook to pressure the Kennedy School to bend to their desires. If such increased pressure is the stick to force Kennedy School leadership in line with Facebook's interests, the carrot would come weeks later in the form of a half-billion-dollar financial commitment by the Chan Zuckerberg Initiative.

The Facebook Archive

71. Shortly after Ms. Haugen's disclosures and after Dr. Donovan lawfully obtained a copy of all the primary internal documents comprising Ms. Haugen's disclosure, Dr. Donovan and her team began an effort to publish, in redacted form, copies of the underlying documents in the public interest. This project came to be

⁹¹ Email correspondence to Latanya Sweeney, Laura Manley, Joan Donovan, et. al., *FBarchive team meetings notes - 8/25/2022*, (Aug. 25, 2022, 10:33 a.m.), a copy of which is included at "Exhibit 14".

known as the “Facebook Archive” or “FB Archive” and Dr. Donovan was leading the effort. In order to move things along, on October 16, 2021 Dr. Donovan reached out to Dr. Sweeney, seeking to collaborate as a trusted partner. Dr. Donovan describes this writing:

On October 16, 2021, I sent this email to Dr. Sweeney, my most trusted colleague, about my plans to make an archive from the Facebook documents.

Subject: Fb whistleblower docs?

Hi Latanya, [REDACTED] has the FB whistleblower files (tens of thousands of cell phone pictures of computer screens). Would you want to talk with me and [REDACTED] about possibly making a searchable archive of these documents for the public interest? [REDACTED] will be in town next week along with my whole team and we would really appreciate any time you could spare to talk this through and possibly have you host it.

I can be in touch with [REDACTED] about scheduling if this is something of interest.

Hope you’re doing well! ⁹²

72. Unfortunately, after the Dean’s Council meeting and Dean Elmendorf’s admonitions, it became apparent to Dr. Donovan that Dr. Sweeney and others were no longer in agreement on the goals and vision for the FB Archive. In fact, by November 2022, Dr. Donovan came to realize that Dr. Sweeney was taking the Facebook Archive on a different path from their agreed upon way forward.⁹³

73. Prior to Dr. Donovan’s realization that at least two of her own trusted colleagues were working against her, there were concerns along the way. For example: in the Spring of 2022, the Facebook Archive project slowed to a crawl because of concerns that anything that touched Facebook/Meta would face backlash from Dean Elmendorf. Seemingly to try and work through the problem, Dr. Sweeney and Ms. Manley were devising strategies to avoid upsetting Dean Elmendorf. Dr. Donovan writes:

By Spring 2022, the FBArchive project had slowed to a crawl. Because it was woven into the culture of HKS that anything that touched Facebook was likely to

⁹² Donovan Decl. at ¶ 25; Email correspondence from Joan Donovan to Latanya Sweeney, *Fb whistleblower docs?* (Oct. 16, 2023, 11:51 p.m.), a copy of which is included at Exhibit “15”.

⁹³ Donovan Decl. at ¶ 36.

face backlash from Dean Elmendorf. Dr. Sweeney and Ms. Manley were coming up with strategies to avoid upsetting Dean Elmendorf. They drafted a letter that they hoped Dean Elmendorf would send to Mr. Schrage and Ms. Sandberg. Dr. Sweeney wrote to me and Ms. Manley on 04/12/2022:

Hi,

I think more of it as an short email to Doug that recommends a research message to Eliot and Sheryl. Maybe I should send the message to keep it more aligned with the research mission. I would write something like the following. See what you and the others think...

Doug,

one of the groups that can benefit the most from making fbarchive public is Facebook itself. The documents reveal several issues that Facebook struggles with, and for which, the best solutions are not known. They are just open questions. FBarchive provides a perfect opportunity to get a thousand great minds to work on content moderation approaches and other difficult issues Facebook faces. These issues lie at the intersection of technology design and accompanying policy, and so fbarchive makes the environment ripe for research and insight.

If you find it helpful, you might share the idea with Eliot or Sheryl that Facebook may be the biggest benefactor. You might even go further and suggest that they have researchers who work with us in some capacity after fbarchive launches.

--LS⁹⁴

74. Dr. Donovan does not know if the above email was ever sent to Dean Elmendorf.⁹⁵

75. This is concerning. What was supposed to be an independent research project to house the Facebook Files has morphed into both Dr. Sweeney and Ms. Manley ostensibly helping Dean Elmendorf placate the very company Dr. Donovan was researching. The Dean's loyalty to Meta leadership and his ongoing actions protecting affiliated funders' interests created a very real

⁹⁴ Donovan Decl. at ¶ 35; Email correspondence from Latanya Sweeney to Joan Donovan and Laura Manley, *Note for Elliot + Sheryl*, (Apr. 12, 2022, 5:08 p.m.), a copy of which is included at Exhibit "16".

⁹⁵ Donovan Decl. at ¶ 35.

conflict of interest with his leadership of an institution doing research on that very corporation.

76. In a February 2023 **press release about the winding down of TASC**⁹⁶ Ms. Gibbs, announced – without any discussion with Dr. Donovan – that Dr. Donovan was cut out of the Facebook Archive project. Dr. Donovan emailed Ms. Gibbs:

I saw in your press releases a claim that the tech lab will keep the fb archive, but that was never discussed with me and Latanya. I am a partner on that project despite how it was framed in the media. I don't think it's fair that you told the media the project will continue without interruption as my team plays a large role in the workshops once the tech platform is finished.⁹⁷

In March 2023, Ms. Gibbs informed Dr. Donovan by email that Harvard “owns” all of the intellectual property that Dr. Donovan created while working at the Shorenstein Center.⁹⁸

77. Dr. Donovan forwarded the above email to Dr. Sweeney, who responded writing:⁹⁹

Hi Joan, The email exchange is painful to read, better yet, it is hard to imagine your experience. I am very sorry that you are having these kinds of communications. Take some time to take care of yourself. As you could expect, I have had no conversations with anyone about those issues.

However, I did see that you mentioned FBarchive. I sent you a text message earlier to let you know that we are near the end now (at last!). So, keep an eye out for launch. I will send you messages.

⁹⁶ Miles J. Herszenhorn, “Harvard Misinformation Expert Joan Donovan Forced to Leave by Kennedy School Dean, Sources Say”, *The Harvard Crimson*, (Feb. 2, 2023), <https://www.thecrimson.com/article/2023/2/2/donovan-forced-leave-hks/> (Last accessed on Oct. 19, 2023).

⁹⁷ Donovan Decl. at ¶ 37; Email correspondence from Joan Donovan to Nancy Gibbs, Doug Elmendorf, et al., *Re: Next Steps* (Mar. 2, 2023, 6:06 p.m.) at p. 4, a copy of which is included at Exhibit “17” (emphasis supplied).

⁹⁸ Donovan Decl. at ¶ 37.

⁹⁹ Donovan Decl. at ¶ 38; Email correspondence from Joan Donovan to Nancy Gibbs, Doug Elmendorf, et al., *Re: Next Steps* (Mar. 6, 2023, 4:04 p.m.) at p.1, a copy of which is included at Exhibit “17”.

We will compose a history page, as I have done with several of my projects to enumerate contributions. Project history pages usually have entries at milestones and record the people involved and the nature of their contributions. The history page for FBarchive will of course memorialize the contributions made by you and TASC. Examples: the datamap and vote flare.

I know the email exchange you shared can be distorting, especially read out of context. But in terms of IP and FBarchive...

The technological IP (design, architecture, and implementation) in FBarchive belongs to the Lab alone. No one can claim IP over the original content of course, but the Lab also has IP in the redaction strategy used. Your team contributed the citation reference used to identify each image and document, and of course, you were part of the original concept. This is the kind of details that we will document on the history page.

A while ago, the FBarchive Privacy and Safety Board had a discussion about the scope of content and activities related to FBarchive. Here's the jest. Anyone can host workshops, write papers, make podcasts, or host social media discussions about its contents. None of these have to be us, or some of those may be us in our various Lab or Center roles but not FBarchive itself.

Also, FBarchive will not publish summaries on the site itself (though we have assembled topical and subject indices). As we near launch, the Board will revisit, but I think these rules of engagement seem the simplest and cleanest way to avoid Facebook and others believing we have some grip with Facebook or some other agenda. I will keep you and your team members in my prayers as you work through this period.

My hope is that you land somewhere great and do amazing work. Success is the best response. —LS¹⁰⁰

78. Lawrence Lessig (“Professor Lessig”) is a professor of law at Harvard University Law and is the founder of Equal Citizens, a founding board member of Creative Commons, and serves on the Scientific Board of AXA Research Fund. He contacted Diane E. Lopez (“Ms. Lopez”), the university’s General Counsel, as a faculty member raising a concern about the Kennedy School claiming that Dr. Donovan does not have any intellectual property rights to her work. On August 28, 2023, he wrote:

¹⁰⁰ Donovan Decl. at ¶ 38 (emphasis supplied).

I am writing to follow up on a concern shared with me by Dr. Joan Donovan. As Joan understands it, HKS has asserted ownership over her research and work product, including the work of the Technology and Social Change Project (TaSC). She fears that claim will interfere with her ability to make the work available generally. As you are likely aware, Joan studies media manipulation, with the goal of educating to reduce the disruption from disinformation. Her work was funded through grants requiring that the research be publicly accessible. For example (and these examples are not exhaustive), the [redacted as "**Donor H**"] "require[d]" that TaSC "license non-software copyrightable work product created with project grant funds under the most recent version of the Creative Commons Attribution license (CC-BY)." Likewise, [**Donor A**] gave \$450,000 to TaSC, one-third to support the design of Joan's Global Media Manipulation casebook. In that agreement, Harvard committed, "Any publications, studies, or research funded by this Grant shall be made available to the public..." Likewise, an \$800,000 grant from [**Donor F**] stipulated that "...news articles, text, photographs, audiovisual materials, or similar content developed using funds provided by the Foundation..." shall be "...available free of charge to the public (such as via a public internet server with no subscription fees)..." The [**Donor F**] grant does not expire until December. My understanding is that there remains about \$150,000 in this grant to publish the lectures and educational materials from the program.

I told Joan that did not believe the University would contradict these open-access obligations and that I would reach out to you informally to clarify the issue. Can you confirm that research conducted under grants with open access obligations remains publicly accessible, regardless of the continuing relationship of the researcher to Harvard?¹⁰¹

79. On August 31, 2023, Ms. Lopez responded, writing:

First, I can confirm that Harvard owns the written work product of its staff members, including Dr. Donovan given her staff appointment. Harvard's IP Policy makes this clear-- that individuals who are staff (without faculty appointments), like me for instance, do their work for the University as a work-for-hire. Second, the fact that Harvard owns a work does not mean it will not be made publicly available. In the case of the materials you reference specifically, they will continue to be available in their archived version through a Harvard website. Certainly, publications resulting from grants made to Harvard

¹⁰¹ Correspondence from Prof. Lessig to Ms. Lopez, *Re: Public Availability of Grant Funded Research* (Aug. 28, 2023), a copy of which is included at Exhibit "18".

that require open access will continue to be available to the public in accordance with the terms of those grants. As you know, Harvard generally is committed to open access and each of its schools have adopted an open access policy. See the one adopted by HKS: <https://osc.hul.harvard.edu/policies/hks/> The open access policy does not directly apply to Dr. Donovan's situation because it addresses works of scholarship owned by Harvard faculty and a limited assignment of rights to the University, rather than works by staff that the University owns ab initio, but I cite it because it reflects the University's general view that the useful information we generate should be made readily available.

Lastly, availability and use are two different things. Works made readily available are still subject to copyright and generally accepted attribution rules when used by others. Your letter does not touch on this subject, but if it is relevant to Dr. Donovan's concerns, she should raise with the Shorenstein Center (Prof. Nancy Gibbs) any request to use works after her Harvard employment ends (save fair use).¹⁰²

80. Professor Lessig asked for clarification about the distinction between "staff" and "faculty" and how those roles affect academic freedom, noting that it "does strike me as critically compromising the academic integrity of a university [i]f a slice of 'faculty' don't have academic independence because 'adjunct' vs something else." Dr. Donovan is categorized by the Kennedy School's human resources department as both staff and faculty. Ms. Lopez responded writing:

When a member of the administration (staff) happens to teach a course, the work they produce for teaching (syllabus, lecture notes, PowerPoint presentations, exam questions) belong to that person. Work produced by that same person when acting as an administrator/staff member, belongs to Harvard. [REDACTED NAME] used to teach a course at the GSE. His work as Vice President and General Counsel belongs to Harvard. His course materials for the GSE class, in contrast, belong to him.¹⁰³

81. In March 2023, without any forewarning, Dr. Donovan and her entire team were removed from the FB Archive project website. She was not invited to any discussions about any proposed changes and was never notified by Dr.

¹⁰² Email from Ms. Lopez to Prof. Lessig (Aug. 31, 2023, 9:55 a.m), a copy of which is included at Exhibit "18".

¹⁰³ Email from Prof. Lessig to Ms. Lopez (Sept. 7, 2023, 4:47 p.m.), a copy of which is included at Exhibit "18".

Sweeney, Ms. Manley, or Ms. Gibbs of the changes until she inquired with Dr. Sweeney.¹⁰⁴ On May 26, 2023, Dr. Sweeney contacted Dr. Donovan to let her know that she – Dr. Sweeney – was launching the Facebook Archive and that she wanted Dr. Donovan’s approval for the “history” page, which documents the individuals who contributed to the project. In response, Dr. Donovan wrote the following email documenting how the Kennedy School has all but removed Dr. Donovan from the very project she started – with the documents that she, herself, legally obtained.¹⁰⁵

Hi Latanya,

I just noticed my team’s name/logo was removed from the FB archive entirely. I’m also not able to sign into the platform and gain access to the documents either.

Can you tell me when I and the TASC team were erased from the project’s front page? I ask because you ultimately had to be the one to direct someone to do it.

The internet archive has TASC still up there on March 5, 2023, so this turn was very recent.

I don’t believe it is fair that I’m undergoing an immense pressure to leave the school and having my credibility tore apart in the media, while also being stripped of my name on the work I fought so hard for. Having my team's name removed from the archive is incredibly upsetting to all of us, especially those who took on this risk and lost. I don't know how to explain to them what happened here. It’s gutting.

I am very grateful for all the work you put into it to carry it forward while I was experiencing pressure and isolation from the Dean, Nancy, and Laura. I don’t mean to put this all on you. I’m asking for some insight, not laying the blame.

To be very clear, I don’t know who made the decision to remove me from the meetings, minutes, and the website. Please tell me how that came about.

¹⁰⁴ Donovan Decl. at ¶ 42.

¹⁰⁵ *Id.*

In the fall of last year, I felt as if some decisions were happening under my radar. For example, when [NAME REDACTED] was let go without speaking to me and it was later communicated that it was simply because the project needed more “tech help.”

Then, I stopped getting calendar updates or notes from [Redacted] and my team was no longer included in correspondence. You and I had agreed that some of those meetings were rather pointless and I trusted that I would be brought back in when the launch was happening. I still work here even if no one will interact with me.

I want you to know that absolutely NO ONE communicated to me that I was being removed from the FB Archive, only that it would continue with the tech lab when I left.

I also did not fully understand what you meant with TASC being deprecated to an “about” page. I was confused by that initially because the “about” google doc was somewhat out of line with what happened internally and historically, but now I understand what purpose it serves.

To be clear, the early history is wrong in that document about the initial drop and the chain of events. I'm sure someone has poured over this line by line legally, but we must always come correct. Again, I don't think this was done maliciously on your part, but I do want to know who wrote this history.

Furthermore, no one has the right to erase my name from my research projects. Whether Laura and Nancy like it or not, we agreed to a clear 3 way partnership on this and we SHARED a vision for implementation, resources, and engagement.

Isolating me and deleting my team's name/contribution as a founding partner feels like retaliation. I need you to remember where we began this. Do you recall what I wrote/ said on Nov 8th, 2021 when the Dean asked me on what basis am I making public comments about Facebook, you and Laura asked if I wanted to take my name off the project after?

I said that it was important to me to represent this work and see it through. We also planned strategy for roll out with press that was more than simply promoting the archive, but also creating public knowledge about its contents. This plan now seems to be buried.

I want to reiterate that I think it's a waste of public impact to tone down the press engagement because we let down the same groups we aimed to serve with this project in the first place.

I see there is also an intro to the platform for June 9th and I wonder why I had to find out about that like every other participant? Why am I being treated this way?

I hope you understand where I'm coming from, and that you know I do value you as a colleague and friend. This is an awful way to find out that one's own intellectual contribution can be relegated to the dustbin of history. Nancy and JZ both told me that "at Harvard you eat what you kill." And unfortunately, this time it's my spirit.

You know what this feels like so I don't have to describe it to you. Please tell me how did this happen?

Best,

Joan¹⁰⁶

82. Dr. Sweeney wrote back attempting to explain the situation, but in her writing it is clear that Dr. Donovan was no longer intended to have any meaningful role in the FB Archive project. When Dr. Sweeney writes below that “we are making tons of changes constantly” and “as we move towards the public launch” the “we” does not include Dr. Donovan.

These are two different issues. Let me explain. First, there are a few different FBarchive websites operational at present as we shift from alpha to beta to the public launch and we still have the curtain page too. I was waiting until the History page went live on the beta website to contact you and all the others who have worked with us to get us to this point in order to facilitate your access to the beta website and discuss next steps, but before I did so, I wanted you to see your names and contributions listed on the history page. I was expecting to send the email to you and the others on Monday (when I return from vacation, but I can see if I can get that to you this weekend or later today! It will describe how to get onto the beta platform, etc.).

¹⁰⁶ Email correspondence from Joan Donovan to Latanya Sweeney, *Re: FBarchive history page and you!* (June 1, 2023, 10:30 p.m.) at p.7, a copy of which is included at Exhibit “19” (emphasis supplied).

I suspect when you ask about TASC being removed from the FBarchive website, you mean the curtain page (fbarchive.org). As we transition towards public launch, we want to list the organizations active at that time in the project. In short, the list of direct contributors is not a historical attribution but a contemporary one. This is why the history page is so important because it identifies how the project evolved and who was involved and how at each stage of its journey. I will make sure TASC is named explicitly in the history page as your prior email message identified.

We are making tons of changes constantly, so it is all a moving target. I think the change to the curtain page involving the removal of TASC would have occurred just after the beta launch when other updates had to be made. I am not certain of the date but it was recent. I am not sure what orgs are listed on the current version, but **as we move towards the public launch**, I would expect New America, Shorenstein, and the Data Privacy Lab to be listed because they are making direct contributions to the public version. Does that make sense? Again, the listing there is not a historic one but a contemporary one.

Joan, I certainly know and understand your pain, but all my projects have followed this same attribution approach of using the history page to document contributions in context and allowing the current version of the project to reflect current activity. A good example is <https://thedatamap.org>. Also, I can definitely assure you that none of this has anything to do with the issues you are having with HKS. In fact, you can be assured that I will make sure you are properly and fully attributed to the FBarchive project, which is why you are so prominently identified by name for your contributions.

You are not being removed from FBarchive. Your important, critical and vital contributions are captured on the History page, or at least that is my intention to forever record that. In terms of moving forward, we need to figure out what you, through TASC or other group, want to do in sponsorship and how to do what you want to accomplish. We can talk about these details next week by phone or in person if you want.

Joan, I have shared the history page with you. What do you consider incorrect? What would you have it say? No one is removing you. But I thought we are talking about TASC and its contribution?

Yes, these are plans we had originally. But things evolved over the year, especially after some discussion with the Privacy and Safety Board months

earlier. Commentary about the archive is being kept separate from the archive itself, so this changes some of the mechanics of those original plans but does not prohibit your vision or intended uses. And, you and I have been talking about possible media options; nothing has been decided on media.

I am very sorry Joan because I think I am to blame for the confusion and misunderstanding. I was just following the way I always do projects, but I think the current setting for you gives it an unintended color.

Let's talk!

P.S. The Tech Lab has been the overwhelming contributor to the project as we approach \$1M in people and resources spent and tasks include the platform's design and function. But the concept starts with Frances and you, which I tried to accurately capture on the History page.¹⁰⁷

83. In the end Ms. Gibbs, Dr. Sweeney, and Ms. Manley completely cut Dr. Donovan off of her own project, both structurally and technologically. Dr. Sweeney's above email made it very clear: without discussion, she took over the Facebook Archive project and removed Dr. Donovan and the TASC team in total.
84. Facebook/Meta succeeded in co-opting Harvard University and successfully ousted one of the few academics adhering to the independence and neutrality that must be part and parcel of any academic research. Furthermore, the impact is real. It was not until on or before October 18, 2023, that the FB Archive became accessible to the limited number of people who had credentials to do so.
85. Moreover, in reviewing the FB Archive history page, Dr. Donovan's and TASC's contributions are minimized and mischaracterized. The page specifically states:

The Public Interest Tech Lab received an anonymous drop of the internal Facebook documents, which arrived as more than 2,000 PDF files that jointly contained over 20,000 photographic screenshots. Dr. Joan Donovan immediately recognized the valuable insight the documents provided to research on mis/disinformation, the challenges inherent in moderating social media at a global scale, and to public understanding of these phenomena. **Seeing an opportunity to use the files to start a dialogue aimed at creating a safer**

¹⁰⁷ Donovan Decl. at ¶ 43; Email correspondence from Latanya Sweeney to Joan Donovan, *Re: FBarchive history page and you!* (June 2, 2023, 11:45 a.m.) at p.7, a copy of which is included at Exhibit "19" (emphasis supplied).

digital environment, Dr. Latanya Sweeney and the Public Interest Tech Lab at Harvard University began the process of designing FBarchive, a first-of-its-kind platform for the public release of whistleblower documents.¹⁰⁸

86. The above narrative is patently false. First and foremost, Harvard University did not receive the documents through an anonymous drop. As established above, it was Dr. Donovan who lawfully came into possession of the documents. Second, it was not Dr. Sweeney and the Public Interest Tech Lab that began the process to review and archive the documents. In fact, it was Dr. Donovan who envisioned creating a “searchable archive” of the documents for the public interest.¹⁰⁹

87. To this day, the Kennedy School continues to mischaracterize and minimize Dr. Donovan’s and the TASC team’s contributions to the project – a project that would not have been possible without Dr. Donovan.

Persona Non Grata: Minimizing Dr. Donovan and Phasing out TASC

88. On September 15, 2022, Dr. Donovan had another meeting with Dean Elmendorf to follow up on the August 24th meeting where he restated he was shutting down TASC.¹¹⁰ Both Dr. Manley and Ms. Gibbs were present. During the meeting, Dean Elmendorf again significantly changed and restricted Dr. Donovan’s duties, making it impossible for Dr. Donovan to fulfill her grant obligations. Dr. Donovan writes:

During this meeting Dean Elmendorf reiterated that I was prohibited from hiring any new employees, unless they were to replace those who left, and that I and TASC are prohibited from starting any new projects. I was also told I could not fundraise for my research.

...

Dean Elmendorf also told me that the Kennedy School will now exercise its ownership of my book, "Meme Wars". Even though some staff at Harvard had published books without Harvard seeking to own the copyright, he stated there

¹⁰⁸ “fbarchive.org,” *fbarchive.org*, <https://fbarchive.org/history> (Last accessed Nov. 27, 2023) (emphasis supplied).

¹⁰⁹ Donovan Decl. at ¶ 25.

¹¹⁰ Joan Donovan calendar event with Doug Elmendorf, *Event: Accepted: 4:00 PM: Follow-up discussion* (Sept. 12, 2022, 4:16 p.m.), a copy of which is included at Exhibit “20”.

was a policy that all staff's research was owned by the University. I asked if this policy applied to writing that was not part of the grants or gifts agreements and was conducted entirely off campus and without university support. I also had a separate contract for the book publication. He reiterated that the school owned "all staff research."

...

... when I inquired specifically about the [Donor E] funding, Dean Elmendorf said that he would "not entertain the notion" of returning any of the unspent [Donor E] funds or engaging the provost on the matter. Given this, Dean Elmendorf further reiterated that I was barred from engaging in any further fundraising.

...

Dean Elmendorf also delivered the news that there would be no tenure track position opening for information and democracy, which he told me about in the August 24, 2022 meeting. While I was always skeptical that this job actually existed, Ms. Gibbs appeared horrified to learn that it was not going forward. She questioned what had happened, and Dean Elmendorf replied that increasing inflation was to blame. I always believed that the job was conjured as a way to quell any internal advocacy by Ms. Gibbs or Dr. Sweeney to retain my team. In fact, Dr. Sweeney and I had discussed the position at length because Dean Elmendorf had told her about it during a private meeting in August. However, when Dean Elmendorf announced a different position at a faculty meeting in early September, I noted to Dr. Sweeney that I had doubts it was going forward.

...

Even though I was barred from fundraising for my own work, Larry Bacow, then President of Harvard, invited me to be a panelist for Harvard's Global Advisory Council held at the Kennedy School in October 2022. The invite was issued on August 14, 2022, just ten days before Dean Elmendorf shut down my project. I immediately accepted President Bacow's invitation with excitement. I took the invitation to be a great indication that Harvard University valued TASC's research and wanted to highlight it. I had feared being blackballed from university events after the fallout from angering Elliot Schrage. When I met with Dean Elmendorf on August 24, 2022, he forbade me from fundraising, but did not mention this event set to happen in October 2022. I fully expected the President's office to cancel my participation, but it went forward.

At this prestigious dinner, I was among 100 very influential people. [REDACTED] a Professor of Government at the Faculty of Arts and Sciences, and I were interviewed by the multi-billionaire donor, [REDACTED]. **All of the upper-level deans and administrators from across Harvard were in attendance. I felt it was hypocritical for me to be on the panel knowing that any funding raised would not go to support my work. However, I was also wary of retribution and did not want to give Dean Elmendorf any further basis to harm my team, my work or my career knowing how closely he was monitoring me and my team. At this event, I did not tell anyone what was happening to me and the TASC team.**

None of this is conducive to a sustainable working environment for producing rigorous academic research. Moreover, the scrutiny over my project by the Dean has caused gridlock among decision-makers within the school who did not know how to enforce restrictions targeted only at me. Ms. Gibbs and Ms. Manley both had remarked on several occasions that they did not know what I could or could not do because the restrictions were so vague – and ever evolving. **Overall, Dean Elmendorf's intent was to reduce the public profile of me and my team, which he stated several times during our meetings. He succeeded in this as I did not publish any white papers, new academic research papers, or do much press after January 2023, as I did not want my team to suffer in retaliation for my "public profile".**¹¹¹

89. What Dean Elmendorf was doing was a betrayal to the foundation of academic research – and vindictive for causing discomfort in his relationship with Meta. He punished Dr. Donovan for her commitment to research integrity and her courage for standing up to a bully like Facebook. Instead of standing up to Facebook, Dean Elmendorf kicked down. He created the conditions that would foster a hostile workplace environment by effectively pitting the entire leadership of the Kennedy School against a single person: Dr. Donovan.

At this meeting, I was scared and confused as the conditions I agreed to work under had shifted dramatically. By my own calculations I had over \$4.5 million in research funding held at Harvard, which was set to languish if I could not continue our research programs. After this meeting, I also feared retaliation from senior administrators who may pass me over for opportunities to network within the university. Moreover, I feared that my name would be poisoned within the leadership of Harvard as I would be branded a difficult woman. What's worse though is that not only am I being harmed professionally by these new

¹¹¹ Donovan Decl. at ¶¶ 121, 128, 130, 131, 139-141 (emphasis supplied).

restrictions, it is impacting extremely talented junior scholars on the TASC project.¹¹²

90. Moreover, Dean Elmendorf – consciously or unconsciously – targeted Dr. Donovan’s employees by proxy. Creating job insecurity for her team members ensured that Dr. Donovan would abide by the Dean’s restrictions. Dr. Donovan writes:

Since these meetings, my team has lost nine full-time employees. I was only allowed to bring on one new fellow. It was a struggle to get that contract approved, even though I started that request before this series of meetings. Since then, we have not had any of our requests approved from Shorenstein leadership and routine actions are much harder to accomplish, like getting budgets drawn up or grant work passed through the office of sponsored research. This has led to frustration among my program manager and coordinator, who have told me they fear for their jobs because they have continuously been ineffective at resolving pending issues.

Across the TASC team, the unstable working conditions caused sadness and low morale as they watched our numbers dwindle and feared their contracts would not be renewed in 2023. While I know the goal of HKS and Shorenstein’s leadership was explicitly to reduce the prominence of my and my team’s research, I was not able to carry out the projects we had designed when the administration was increasingly isolating the team and leaving us to languish. We were intentionally being understaffed throughout 2022.¹¹³

91. On December 1, 2022, Gary King,¹¹⁴ Director of the Institute of Quantitative Social Sciences, told Dr. Donovan, “When you become persona non grata of a Dean at Harvard, it’s best to leave quietly. You can raise money somewhere else.”¹¹⁵ While this conversation occurred in December, by then it was not a secret that Dean Elmendorf was already well underway in removing Dr. Donovan and shutting down TASC.

92. Over the coming months, the slow but steady dismantlement of TASC concluded. By correspondence dated July 13, 2023, the Kennedy School informed Dr. Donovan that they are ending the TASC program and her

¹¹² Donovan Decl. at ¶ 127.

¹¹³ Donovan Decl. at ¶ 125-126.

¹¹⁴ Harvard University, Gary King, <https://gking.harvard.edu/> (Last accessed Oct. 4, 2023).

¹¹⁵ Donovan Decl. at ¶ 136.

employment on August 31, 2023, and that her role as Research Director for the Shorenstein Center is being eliminated.¹¹⁶

Request for Formal Investigation

93. The allegations presented above are serious. In the end, this matter comes down to a single issue: malign influence. How Facebook/Meta have operated in this case is no different to how foreign intelligence services or organized criminal enterprises operate. There are a handful of tried-and-true means to coerce someone or some entity to do something they would not otherwise do, and influence through financial compensation is at or near the top of the list. Objectively, \$500 million is certainly significant financial influence.
94. But Meta/Facebook is also known for placing people and entities under duress, such as when they employed the “Australia Takedown.”¹¹⁷ Here, the visible threat of Mr. Schrage having a very public emotional response would reasonably have been viewed as a harbinger of things to come – just as Dr. Donovan feared and as **Donor G** expressed concerns about. Facebook/Meta has been successful in coercing many people and numerous national governments because they use this “carrot” and “stick” approach simultaneously.
95. Accordingly, the allegations as discussed, above, lead to more questions than answers. They include, but are not limited to:
- a. Was the Kennedy School inappropriately influenced by Meta?
 - b. How did Dr. Donovan, a respected misinformation and disinformation researcher, go from “hero to zero”? How did she go from building a program, a darling of the Kennedy School on whose reputation the leadership could easily raise money to “persona non grata”.
 - c. Why did the Kennedy School deceive donors and benefactors of how their hard-earned and well intended contributions would be used?
 - d. Did the Kennedy School misappropriate charitable funds?

¹¹⁶ Email correspondence from Jen Goodman, Associate Director of Human Resources/Senior Human Resources Consultant to Joan Donovan (dated July 13, 2023), a copy of which is included at Exhibit “2”.

¹¹⁷ Keach Hagey, et al., “Facebook Deliberately Caused Havoc in Australia to Influence New Law, Whistleblowers Say,” *The Wall Street Journal*, May 5, 2022, <https://www.wsj.com/articles/facebook-deliberately-caused-havoc-in-australia-to-influence-new-law-whistleblowers-say-11651768302> (Last accessed Oct. 4, 2023).

-
- e. Did the Kennedy School engage in the misleading solicitation for charitable funds?
 - f. Did the Kennedy School infringe on Dr. Donovan's civil rights?
 - g. Did the Kennedy School violate its own policies and commitments to academic freedom, funding transparency, and non-retaliation?
 - h. Did the Kennedy School improperly retain and interfere with Dr. Donovan's intellectual property?

96. To wit, we respectfully request that you initiate a comprehensive investigation of Harvard University, the Kennedy School, and all university senior officials involved in this matter. Moreover, we ask that upon completion of the investigation that the report of investigation be made public and that any and all appropriate corrective action be taken to ensure academic freedom and integrity at Harvard University is restored and protected on an ongoing basis.

97. As we all know, these same tactics and influence campaigns championed by Big Tobacco and oil companies generated massive societal-wide harms globally. Dr. Donovan's own research illustrates the growing list of harms caused by Meta's failure to address the known problems with their own products. Ms. Haugen's disclosures just further proved that researchers outside of Meta were right to be critical and the company prioritized profits over well-being. The task of the academic is to seek and say the truth, even if it is controversial. When the truth is attacked, the academic defends the truth with evidence. What happened at the Kennedy School to Dr. Donovan and her team was an attack on the truth. It is imperative that we protect the integrity of independent research and academic freedom for the sake of democracy, justice, and national security.

98. We look forward to cooperating with an investigation into this matter and to facilitate access to additional documentation that we believe may be relevant for your review.

Very respectfully,



Andrew P. Bakaj, Esq.
Chief Legal Counsel

[Redacted]



Kyle Gardiner, Esq.
Senior Counsel

[Redacted]

Enclosures: As stated.

Exhibit “1”



HARVARD Kennedy School
JOHN F. KENNEDY SCHOOL OF GOVERNMENT

October 13, 2021

Joan Donovan



Dear Joan:

I am pleased to confirm your exempt full-time appointment as Research Director for the Shorenstein Center/ Director, Technology and Social Change Research Project has been extended through December 31, 2024.

This is a term appointment contingent upon your work performance meeting the needs of the department and the continued availability of funding designed to support the position. In the event that the needs of the department should change, the length of this appointment may be changed. You will not be entitled to severance pay or layoff benefits of any kind at the end of your term appointment.

The essence of the Harvard Kennedy School is an abiding commitment to training enlightened public leaders and generating the ideas that provide answers to the world's most challenging public problems. On behalf of the Kennedy School I would like to thank you for your valuable contribution towards achieving this mission.

If you have any questions, please do not hesitate to contact me at .

Sincerely,

Jen
Goodman
n

Digitally signed
by Jen
Goodman
Date: 2021.10.13
11:24:12 -04'00'

Jen Goodman

Associate Director of Human Resources/Senior Human Resources Consultant

cc: Laura Manley
Employment File

Exhibit “2”



HARVARD Kennedy School
JOHN F. KENNEDY SCHOOL OF GOVERNMENT

July 13, 2023

Joan Donovan
[REDACTED]

Dear Joan:

This letter confirms our conversation regarding your position as Research Director for the Shorenstein Center/ Director, Technology and Social Change Research Project for the Harvard Kennedy School.

The Technology and Social Change (TaSC) Project is ending on August 31, 2023. Additionally, the role of Research Director for the Shorenstein Center is being eliminated. Therefore, effective August 31, 2023 (the "Separation Date"), your position will be eliminated, and you will be laid off from Harvard University. Unless you obtain other employment, you will continue on the payroll for the remainder of your notice period through August 31, 2023. You should be prepared to be available on call, upon reasonable notice, to provide transitional assistance, if requested, during your notice period.

As a condition of the receipt of the following layoff benefits, you will be asked to sign an Election Form and Release of Claims. A copy of that document is included in your layoff packet and, as indicated, includes a release of any claims against Harvard. You are advised to consult with an attorney prior to signing the Election Form and Release of Claims:

- **Severance:** If you have not secured other Harvard employment prior to your Separation Date, your layoff will become effective and you will be eligible for severance at the rate of one week of pay per year of service, less any applicable legally required and voluntary authorized deductions. This amounts to [REDACTED]. Consistent with University policy, you will also be eligible for pay in lieu of notice for the period between September 1, 2023 and September 15, 2023 totaling [REDACTED]. Please note that if

you obtain another Harvard position within a certain period, you will be required to refund any excess severance received, measured by the number of weeks of severance received minus the number of weeks not employed by the University.

- ***Enhanced Layoff Benefits:***

Additional Severance: You are being offered an enhanced severance payment of four weeks of your base salary as additional severance. If you have not secured other Harvard employment prior to your Separation Date, your layoff will become effective, and you will be eligible for this four weeks' enhanced severance payment. You will be permitted to retain this four weeks' enhanced severance payment, even if subsequently re-employed by Harvard.

Outplacement: You are eligible for six months of outplacement from Clear Rock, Inc. Information about those services will be provided to you by Clear Rock. You may choose when to start using your six months of outplacement but need to start that process within six months of your termination date. You may meet with Clear Rock up to two times before deciding whether to sign the Election Form and Release of Claims.

- Please note that none of the layoff benefits listed above will be provided to you if your employment should end before your Separation Date due to your resignation or discharge for cause or if you are hired elsewhere at Harvard prior to your Separation Date.

You will also be paid for any vacation days you have accrued and not used as of your Separation Date.

Under COBRA, you may continue your health, dental, and vision benefits for up to 18 months, starting on your Separation Date. The first 12 months of COBRA coverage will be at one and one-half times the applicable staff rate. You will be responsible for 102% of the full premium for the last six months of coverage. Included in your layoff packet is a sheet that reflects the 2023 COBRA rates.

If you have any questions about how your Harvard benefits will be affected by your layoff, please contact the Benefits Office at [REDACTED].

Donovan
July 13, 2023
Page 3

You may apply for unemployment compensation at any of the Division of Unemployment Assistance offices in the Commonwealth of Massachusetts following your Separation Date. Information about the application process and filing locations is included in your layoff packet. Your final paycheck will contain information that you will need to bring with you to the Division of Unemployment Assistance if you decide to apply for benefits.

On behalf of Shorenstein Center, Harvard University, I would like to thank you for your service to the University. I wish you the best in your future endeavors.

Sincerely,

Jennifer Goodman
Director of Human Resources

Exhibit “3”

DECLARATION OF JOAN DONOVAN

I, Joan Donovan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a person over eighteen (18) years of age and competent to testify. I make this Declaration on personal knowledge and in support of my disclosure that leadership at Harvard University's Kennedy School ("HKS") were inappropriately influenced by Meta/Facebook. A significant conflict of interest arising from funding and personal relationships has created a pervasive culture at HKS of operating in the best interest of Facebook/Meta at the expense of academic freedom and Harvard's own stated mission.
2. Beginning in October 2021, my academic research was perceived by HKS Dean Doug Elmendorf as adverse to the school's relationship with Facebook/Meta and led to the shut down of independent research that I and my team were conducting into misinformation and disinformation on social media platform systems. Ultimately, in August 2023, the Kennedy School culminated their years-long systematic effort to silence my team's work by terminating my employment contract and shutting down a fully-funded research program within the Kennedy School. These efforts impacted my fellow researchers within the institution and prevented my colleagues within the field more broadly to meaningfully collaborate on misinformation and disinformation – issues that are clear and present dangers to our democracy and democracies around the world.
3. I currently serve as an Assistant Professor at Boston University's College of Communication where I hold dual appointments in the Division of Emerging Media Studies and the Journalism Department. Until August 2023, I served within Harvard University's Kennedy School as the Director of the Technology and Social Change Research Project ("TASC") while concurrently serving as the Research Director of the Shorenstein Center on Media, Politics and Public Policy. My focus is on the harmful effects of misinformation and disinformation, media manipulation, online extremism, and politics, their effects on society, and how to shape policy to protect American democracy and national security. I received my Ph.D in Sociology and Science Studies from the University of California San Diego, and was a postdoctoral fellow at the University of California, Los Angeles' Institute for Society and Genetics.
4. Prior to joining the Kennedy School, I served as the Research Lead for the Media Manipulation Initiative at Data & Society, a nonprofit research institution studying the social impact of data and emerging technologies. While there I mapped how interest groups, governments, political operatives, corporations, and others use the internet and media to disrupt social institutions. It is

because of my work at Data & Society that the Kennedy School recruited me to join the school, promising to support my work both financially and administratively which I accepted. I accepted this position believing that I would have the academic freedom to conduct meaningful research with the support of a highly respected institution.

5. I began working at the Kennedy School in December 2018 on an initial one year contract as the "Director of the Technology and Social Change Project." Despite Shorenstein Center's assurances regarding support for my work and my research team, my employment offer was bereft of any additional funding support for researchers or administrators.
6. Doing all of my own fundraising was the heaviest burden. Despite being told that the Kennedy School's Shorenstein Center would take care of the funding, in early 2019 I eventually had to negotiate \$700,000 from the Miami Foundation to pay for researchers, an administrator, and my own salary. During the duration of my time at Harvard, I secured over \$12 million in funding for research, policy recommendations and public education. In April 2019, the then-director of the Shorenstein Center's appointment ended, and I subsequently renegotiated a three-year contract with Nancy Gibbs, the new Faculty Director, and Setti Warren, the center's Executive Director.
7. In February 2020, I received a promotion to Research Director for the entire Shorenstein Center. These were tangible accolades for my research, my public research profile, and my ability to bring new philanthropic interest to the Shorenstein Center. I viewed this as an honor and treated the position accordingly.
8. Despite further success and praise from the leadership as Research Director, beginning in Fall 2021 HKS leadership suddenly began restricting my research capabilities. Furthermore, and just as concerning, they directed that both my research and my own voice become less "prominent" or publicly accessible – be it to other academics, researchers or the public at large. This was the beginning of a nearly two year process of silencing TASC's research culminating in the dissolution of TASC.

The Facebook Factor

9. As my research and expertise developed, my work was gaining attention among leaders within social media companies and led to oftentimes uncomfortable outreach from the very platforms I was researching. For example: in 2019 Amber Heffernan, who was then with Global Strategic Initiatives at Facebook, asked me to speak with Facebook employees about online hate issues. In 2020, she invited me to present my research as part of a "fireside chat". Nathaniel Gleicher, who is currently the Director and Head of Security Policy at Meta, offered to provide me with an

embargoed copy of the company's transparency report if I agreed to comment to the press about it – the implication was that my comments would ostensibly be positive. I believed this because he told me that he wanted me to have an early copy of the transparency report because he thought the media would be contacting me. Working in my field, I had become aware that "access" often came with expectations. Over time, it became apparent that leaders within Facebook were trying to influence me by offering to "fund" my research – something that I viewed as an inherent conflict of interest. And so, I refused such offers of monetary resources and data.

10. Furthermore, I was well aware that Facebook had a history of offering financial support to researchers that came with expectations, examples include Dr. Hany Farid from University of California Berkeley and Dr. Taylor Owen from McGill University. Dr. Farid told me that he had to return over a million dollars to Facebook after he was contacted by a Meta executive following some critical, but honest, comments made by Dr. Farid to the media. Dr. Owen, a professor of public policy and researcher of disinformation had a different but equally uncomfortable experience, where Kevin Chan, a prominent Facebook executive in Canada was appointed as an advisory board member of the Max Bell School of Public Policy at McGill University. Mr. Chan took it upon himself to use an advisory board meeting to disparage Dr. Owen and his research as it pertained to Facebook. Mr. Chan, then, requested that the school "fact-check" their tweets about Owen's research and not to promote his research from their own Twitter account. It was clear that what Mr. Chan found objectionable was not factual errors, but rather the divergence of Dr. Owen's research findings and Facebook's public narratives. Mr. Chan also offered funding for a journalism program at McGill, but the funding was turned down after Dr. Owens intervened to explain that Meta funding journalism programs presented a conflict of interest. With that said, my status within the Kennedy School, and professional reputation outside of the school, appeared to be on solid footing at that time. However, things changed beginning in the Fall of 2021.
11. In October 2021, Frances Haugen's lawful disclosure about Facebook putting profits over people and the platform's impact on global society, safety, and security more broadly, became public. Her disclosure, including thousands of internal Facebook documents, was so significant that it was not only *the* topic of conversation among researchers within my field, but her disclosure was – for weeks – the top news story in the mainstream press. The same week that the public learned about Ms. Haugen's disclosures, Kennedy School leadership asked that I speak

before the school's "Dean's Council", a group of approximately 50 top donors who provide the Kennedy School with substantial multi-year funding. I accepted this invitation and viewed it as an honor.

12. When the Dean's Council met on October 29, 2021, Ms. Haugen's disclosures had already become publicly known. As a result, the majority of the conversation focused on Facebook and her disclosures. Ms. Gibbs acted as the host of the event and interviewed me about media manipulation, disinformation, journalism, and democracy. The event was scheduled to last an hour. The panel was split into two parts. The majority of the time I spoke with Ms Gibbs about the impact of disinformation on journalism and democracy. Although, we began with the top line story of the week, Francis Haugen's disclosures of Facebook's internal research that proved what outside researchers had found for years, i.e. Facebook knew its products were harmful to the public as they promoted poor mental health in teens, produced inciting effects, and spread misinformation far and wide. The final 15 mins of the panel was devoted to questions from the donors. Ms. Gibbs opened with questions about the Facebook disclosure. At that moment, I was one of the only researchers in the world who had access to the documents – a fact I provided during this event. I told those present that these Facebook documents are "the most important documents in internet history." During the talk, I raised the same concerns about Facebook's impact on democracy that were then being discussed in the mainstream press and media outlets – around the world. That is to say, my comments and concerns were not in any way out of sync with public discourse.
13. As Ms. Gibbs was interviewing me, one member of the Dean's Council, Elliot Schrage, the Former Head of Communication for Facebook and, from my experience, he is known in the misinformation research community as Facebook's "fixer" within academia, became increasingly and visibly agitated. During the interview portion of the meeting, Mr. Schrage was rocking in his chair in a visibly agitated manner and raised his hand several times attempting to interject during the discussion. Throughout the audience questions portion of the event, Mr. Schrage monopolized the discussion by accusing me that my reading of the documents was inaccurate and that he disagreed with all prior discussion about Facebook. I tried to answer Mr. Schrage's allegations, but he kept speaking out angrily. Eventually, [REDACTED], a member of the Dean's Council who introduced the session, had to intervene. Mr. Schrage's conduct was so overwhelming and disruptive that [REDACTED] was forced to raise her voice in an attempt to try and calm Mr. Schrage. It was tense, awkward, and embarrassing for everyone involved.

14. I texted Ms. Gibbs that evening because I was worried I was going to lose my job based on Mr. Schrage's anger and the minefield of pro-Facebook influence at HKS. I was very upset by the interaction and was scared that my Dean's Council interview would lead to trouble for me or my team within HKS. I wrote in a text chat:

Oct 29, 2021, 6:15 PM

Should I be worried about the way schrage got mad at me?

I think we should have worried if he DIDNT get mad. [REDACTED] said everyone says it was great. And I think eliot's position is well known. That said— we could invite him to write something for us about why "it's more complicated" than the critics think....

Not interested in arguing with him. Just thought it was interesting that he raised his hand 15 mins into the chat. Fb laid off a ton of people and they are truly a scary company.

Oh yes. But it's much more out in the open now thank goodness.

But I thought you were just terrific. So sophisticated and fair in your thinking and analysis. Made me proud.

Thank you! We are a great team. I'm in Virginia for the weekend. Should be nice to hear away

I'm so glad you're getting away. Have a safe and peaceful trip. And savor all that you've accomplished these past weeks!

15. Just ten days later on November 8, 2021, I and Ms. Gibbs received a highly unusual¹ email from Douglas Elmendorf, the Dean of the Kennedy School. He began his email by explicitly referencing the Dean's Council discussion from the prior week. He asked to schedule a time to meet with me and other deans to discuss my research in the near future. Typically when Dean Elmendorf communicated with me, he would either ask about my research, generally or praise

¹ Previously Dean Elmendorf's communications with me were full of praise. For example on August 8, 2019 he wrote in an email: "Hi Joan, I hope your summer has been going well – and that you've had some time for relaxation alongside all the wonderful work you've been doing. I'm so pleased to see the difference you're making in the way that news is reported and information is conveyed. I think you're working at such a fascinating and crucial intersection of technical challenges and human challenges, and I eagerly await your steps forward. I would be happy as a citizen for you to be doing this work anywhere, but as the HKS dean, I am especially happy for you to be doing this work with Nancy and others here. Thanks for that! Best, Doug"

me for a public appearance or OpEd. However, in this instance, the dean was laser-focused on Facebook. He explicitly noted that he was not as interested to learn about my overarching research, but rather specific questions arising from the Dean's Council meeting. He wrote the following:

Subject: misinformation

Hello Joan and Nancy,

Your interesting discussion with the Dean's Council a few weeks ago reminded me that I haven't sat down and talked with you about this work in a while. I mentioned my interest to [3 HARVARD DEANS' NAMES REDACTED], who were all eager to learn more themselves. Can the six of us meet sometime in the next few weeks?

Given the limited time we'll have and the complexity of the work you're doing, I think it'd be better *not* to try for an overview but instead to focus on a few key issues drawn from the questions raised by the Dean's Council and my own limited reading of current events. In particular, I'd love to hear more about:

- How you define and measure the problem of misinformation that shows how the current situation is different from (or similar to) misinformation in earlier eras?
- How you define the problem of misinformation for both analysis and possible responses (algorithm-adjusting or policy-making) when there is **no independent arbiter of truth** [emphasis supplied] (in this country or others) and Constitutional protections of speech (in some countries)? I don't mean the mechanics, but the principles; for example, how could one decide when objections against vaccines are okay or not okay, when rejection of human-caused climate change is okay or not okay, etc.
- How the research you're conducting provides a basis for comments you're making about current events. I understand why Nancy started with the news about Facebook, but someone pointed out to me that very little that has appeared in the Misinformation Review seems to be about Facebook, which makes me wonder how the current state of research on misinformation does (or doesn't) overlap with interest on the outreach side.

Thanks,

Doug

16. When I read this email from Dean Elmendorf, it was obvious to me that Facebook, either directly or through intermediaries, was communicating with him about my research. It became apparent very quickly that Dean Elmendorf was being told Facebook's position on my team's research and my interviews in the media concerning Facebook. I thought the agitation demonstrated by Mr. Schrage based on the confluence of my disinformation research, my receipt of the entire contents of Frances Haugen's cache of internal Facebook documents, and my view of the significance of these documents was likely shared by Meta leadership and former leadership who were close to the Dean. What struck me as particularly notable was his use of the phrase "arbiters of truth". This phrase had become a meme among misinformation researchers because Facebook public relations reiterated it so often. Moreover, at that time Facebook was also pushing the idea that the words "misinformation" and "disinformation" were too ill defined to be enforced – so his questions matched Facebook's public narrative. For example, Facebook advocated using the phrase "real-world harm" in place of the word "incitement" in an attempt to redefine and reset the dialogue and the research around social media impact more broadly – distancing themselves from any responsibility for the consequences of their decisions.
17. I was well aware of tactics like this from studying the tobacco industry earlier in my career. Throughout the 1970s and 1980s, tobacco companies wanted to brand everyone as either "active or a passive smokers," that meant, even children or those who were simply dining in a restaurant were all "passive smokers." For corporations, controlling the narrative about harm caused by their products is a key part of communications and public relations strategies. Thankfully for the public, through the work of researchers and anti-smoking advocates, the term "secondhand smoke" won out. Through my study of the Tobacco industry playbook, I understood the battle over who gets to define misinformation and disinformation in starkly similar terms to the earlier debate over "passive smokers" vs. "secondhand smoke".
18. I was also wary of Mr. Schrage because of media reports and discussions amongst colleagues that worked closely with Mr. Schrage on the Social Science One project for using media manipulation as part of his job.² For example in 2018, CNBC reported that Mr. Schrage tasked a politically-affiliated public relations firm to push negative narratives about Facebook's competitors, namely Apple and Google.³ After Dean Elmendorf's email on November 8, 2021, I

² <https://www.buzzfeednews.com/article/craigsilverman/funders-are-ready-to-pull-out-of-facebooks-academic-data>

³ <https://www.cnbc.com/2018/11/21/facebook-elliott-schrage-takes-the-blame-for-hiring-definers-pr-firm.html>

believed Mr. Schrage, and likely others, were using the same approach against me and my team. Further, I had been warned by other faculty at Harvard and other universities that Mr. Schrage and Sheryl Sandberg, former COO of Facebook, were particularly strategic when influencing academia, the media, and their powerful peers. *The Wall Street Journal* reported that Ms. Sandberg had pressured *The Daily Mail* to drop stories related to her boyfriend's restraining order on two occasions in 2016 and 2019.⁴ From these reports, it seemed that her media manipulation tactic was to contact those in very high positions to request they look into the story as it was developing. As reported by *The Wall Street Journal*, Ms. Sandberg was very concerned the negative press about her boyfriend would tarnish her reputation as an advocate for women, so she killed the stories.

19. On a different matter, Ms. Gibbs emailed me and Dr. Latanya Sweeney, the Daniel Paul Professor of the Practice of Government and Technology at Harvard Kennedy School and my co-principal investigator, on 04/23/2021, that Facebook had reached out to host some private meetings with other researchers at Shorenstein. I advised Ms. Gibbs to stay away from Facebook as they would want to know about my research. Dr. Sweeney also expressed concern that Facebook would attempt to co-opt Shorenstein research for its own purpose. Ms. Gibbs wrote to us:

Thanks for this essential context.

They don't scare me. Sheryl made her priorities clear to me a year or two ago, when she called and asked if I'd talk with her about "the narrative around Facebook." I told her I was always happy to talk, but the problem was not the narrative, it was the product. She stopped calling after that.

So, we do this the right way.

Thank you both for your integrity and strength.

Nancy

I believed Ms. Gibbs was telling the truth that she valued independent research, but as I came to learn it was not a universal value held across HKS or Harvard University.

20. Moreover, faculty colleagues at Harvard also informed me that Mr. Schrage and Sheryl Sandberg, former COO of Facebook, both had close personal relationships with Dean Elmendorf as

⁴ <https://www.wsj.com/amp/articles/sandberg-facebook-koenig-activision-blizzard-daily-mail-11650549074>

donors and alumni. Notably, I was aware that Dean Elmendorf was Sheryl Sandberg's undergraduate advisor in 1991⁵ and continues to maintain a close personal relationship with her.

21. In fact, Dr. Sweeney once told me that she had attended a dinner at Ms. Sandberg's home along with Dean Elmendorf, just prior to the start of the pandemic. She was so struck by the closeness of their decades-long friendship that she confided in me her own concerns about Dean Elmendorf's close, personal relationship with Ms. Sandberg and the potential conflict of interest with the work we were doing. Dean Elmendorf would go on to attend Sheryl Sandberg's wedding on August 20, 2022 in Wyoming, where he was photographed by People Magazine.⁶ A mere four days afterwards, Dean Elmendorf told me that he was shutting down my research team and would not honor my employment contract, which was to conclude on 12/31/2024.
22. Before that meeting on August 24, 2022, I had already been called into the Dean's office to attest for the integrity of my research. Dean Elmendorf's email in November 2021 was alarming, not only because for the first time he was singling out and questioning the very basic tenets of my research, he was also suggesting that my public comments were out of step with the rest of the field about Facebook's role in disseminating misinformation. I found his position confusing because anyone who read the news that week was inundated by the bad press about Facebook stemming from their own internal documents. I was but one voice in the chorus of professors, Members of Congress, researchers, pundits and human rights advocates discussing the issues. I sought to defend the integrity of my work and quickly responded to him on 11/08/2021, writing:

Subject: Re: misinformation

Hi Doug,

This sounds like a great idea. I wanted to put a few ideas out in the open so we can discuss.

Most of our research is available at mediamanipulation.org, which will give you a sense of how we define these categories of misinformation and disinformation and deploy them in the context of our research. Most disinformation campaigns are multi-platform and involve some public planning, so my team does not only study Facebook, or twitter, in isolation. Rather, we make incidents into intelligence by following events as they spread online. We use no data provided

⁵ <https://www.thecrimson.com/article/2016/5/24/Sheryl-Sandberg-profile/>

⁶ <https://people.com/human-interest/inside-sheryl-sandberg-and-tom-bernthals-western-wedding-in-wyoming/>

by platform companies and conduct all of our research independently. Mis and disinformation is best discussed within a specific case, where we can point to evidence and discuss intention. Tech companies often point to these words as empty signifiers, which I disagree with. If misinformation was not a problem on their products, why build teams and spend millions to try to eradicate it?

It is the position of tech companies that the definitions of misinformation and disinformation are more murky than it seems. In some instances, we are unable to conclude who/what is behind a particular campaign and in that case we will report that absence as well. Usually our case studies involve finding a group of people using one platform to coordinate and then they deploy the harassment or fake evidence on another platform. Typically, disinformation campaigns will pop up in the context of breaking news events, but we do not publish research until months have passed and we have made sure that our work is sound.

We study Facebook in a number of ways, including using FB's own tool "crowdtangle" to glean insights from public pages. It is a notoriously difficult platform to explore, but researchers often discuss how to keep up with new methods.

In our case studies, we do not make proclamations that a vaccine is okay or not okay or other moral judgements about politics. What we look for is instances where individuals or groups manipulate the design of social media to achieve some specific ends, be in political or profitable gain. We look for behaviors where individuals or groups have created fake accounts, or bought advertising, or have sought to wedge public issues in some underhanded way by hiding their identity, affiliations, or intentions. In this way, we do not generally speak about what is good or bad for a society, but rather what is true or false about a specific public event.

I believe there is a bit of a mix up with the Misinfo Review, which is [NAME REDACTED]'s project. I do provide some mentorship to the post doc editor on the project, but I am not writing or vetting papers on that project. Largely, I try to help when needed.

I have been researching Facebook for over a decade. My speciality is Internet studies and I have several peer reviewed papers about the relationship between internet technology, social movements, and social change. I also have numerous papers and articles that involve studies of Facebook both directly, where I investigated how rumors of the efficacy of hydroxychloroquine spread early in the pandemic, and indirectly, where Facebook is one of several companies

implicated in the circulation of dangerous misinformation. Here is a short paper that encapsulates how we do our research and the way it relates to more contemporary historical case studies

<https://jods.mitpress.mit.edu/pub/2gnso48a/release/8>

Best,
Joan

23. At this point in time, not only did I have lawful access to the Facebook documents, I was working with Dr. Sweeney and Ms. Manley to publish them – in the public interest. Dean Elmendorf would come to learn about the document project, that same day 11/08/2021, in a meeting with Dr. Sweeney. This public access effort would become known as the Facebook Archive or FB Archive. Also on November 8, 2021, as our Facebook Archive team was preparing for Dr. Sweeney to attend a meeting with Kennedy School leadership to discuss the FB Archive project, I sent this email to Dr. Sweeney, Ms. Gibbs, and Ms. Manley writing:

From: Donovan, Joan M <[EMAIL ADDRESS REDACTED]>

Sent: Monday, November 8, 2021 8:35 AM

Subject: Re: fbarchive.org

This all looks incredible to me!

Just a heads up, Nancy I got an email this morning from the Dean asking very specific questions about Facebook and how the research at TASC is conducted. At the deans council meeting Elliot Schrage was very angry with me and now the Dean wonders how we can assess misinformation when no one is "an arbiter of truth." So, they did go to the Dean after that council meeting. This is really going to bring the heat.

I am going to meet with [REDACTED] on Wednesday at 115pm about helping to clean the archive. I will also invite [REDACTED] too. Anyone else I should include? It's a cursory meeting to see how many people we can assemble. I'll include y'all on the invite too.

Best,
Joan

24. Later that morning but before the meeting, Ms. Manley and Dr. Sweeney suggested taking TASC and my name off the project so as not to agitate Dean Elmendorf. Dr. Sweeney memorialized this in an email:

Subject: Re: fbarchive.org

Hi,

Thanks for the heads up Joan. Here is what I suggest...

1. Let's remove the explicit listing of TASC, minimally, or of all three groups, when the website updates later today. No reason to put a target on the project that allows FB to claim bias before we even do anything. Otherwise, we have to deal with their discrediting campaign before we can even launch. We can still include logos for the Tech Lab and the Data Privacy Lab. Doing so may reduce the heat. Just throwing this out as a possibility.
2. At the right time, we should invite Facebook to help annotate the documents and offer explanation. We realize that one document or a couple of images cannot convey the whole story, so we welcome Facebook to join the platform and provide tags and discussion to further understanding. If Facebook is concerned about "truth", and we certainly are, this seems a good opportunity for Facebook to clarify.

Joan, I am not sure what all the extra people and names mean, but that seems a conversation for our next meeting. Maybe we can spec out who is doing what and in which version at the meeting.

[REDACTED] had mentioned a group email that we all share. If we want a group email, we have to set it up independently of HKS. The schools, FAS and SEAS, for example, make bright lines between activities sponsored by research efforts and those sponsored by the schools themselves. FAS, for example, does not control a legitimate research effort, and in exchange, the research effort is not sponsored by the school. I am not sure how Shorenstein in this model. My view: Shorenstein has a legitimate and substantive role to play in the project as part of its research agenda, which is why the explicit inclusion. But that's just my opinion.

If folks want a shared email, we can use Google and hiver, for example. But the email should not have a *.harvard.edu name. We can use Google and hiver or even AWS for *.fbarchive.org addresses. What do you think?

After Laura's edits, I think this is where we are with the content...

Note: Laura, used "primary" instead of "principal" goal because we may have other goals.

Note: used fbarchive.org as Laura suggested to keep the branding clear.

Note: included TASC and Shorenstein unless you advise otherwise. Replaced "in" with "across"

Note: the research aims are more generalizable than the goals of the website, which is why they are listed separately.

Let me know if there are any further or additional edits.

We have established the Facebook Archive (fbarchive.org) with two primary goals: (1) to provide researchers and journalists around the world with searchable, indexed access to curated versions of the internal Facebook documents; and (2) to encourage collaborative analysis of the documents to improve understanding.

fbarchive.org consists of images of documents taken by Francis Haugen, the whistleblower who disclosed tens of thousands of pages of internal Facebook research. Teams at Facebook used social science and data analytics to help the company's leadership understand adverse consequences from their decisions and technology designs. The documents provide a wealth of material for academic and journalistic study and a unique opportunity for collaborative investigation and understanding.

We have removed personal names and other sensitive content that appear in the images for privacy reasons. We are unable to share the raw material as we believe it would be irresponsible to release images without this type of redaction and curation.

fbarchive.org is a research project across the [Public Interest Tech Lab](#), the [Technology and Social Change Project](#), and [the Shorenstein Center](#) at Harvard University. Our research aims are to construct an innovative tool for collaborative investigation of image artifacts, to curate content about the images for improved understanding, and to measure and assess the de-identification of personal names found in images.

We welcome collaborators and participants.

—LS

25. On the origins of the FB Archive, I came into lawful possession of Frances Haugen's trove of documents made available to Congress and from Congress to some journalists in early October 2021. On October 16, 2021, I sent this email to Dr. Sweeney, my most trusted colleague, about my plans to make an archive from the Facebook documents.

Subject: Fb whistleblower docs?

Hi Latanya, [REDACTED] has the FB whistleblower files (tens of thousands of cell phone pictures of computer screens). Would you want to talk with me and [REDACTED] about possibly making a searchable archive of these documents for the public interest? [REDACTED] will be in town next week along with my whole team and we would really appreciate any time you could spare to talk this through and possibly have you host it.

I can be in touch with [REDACTED] about scheduling if this is something of interest.

Hope you're doing well!

26. In early November 2021, during a convening of fellow internet researchers, it became apparent that I was the only one in the room who had possession of the entire cache of Frances Haugen's Facebook documents. I had several offers for collaboration to share the documents with other researchers. I also fielded phone calls from potential funders of any project related to the Facebook documents. I chose to work with Dr. Sweeney because she was the shoulder I leaned on when I needed to decode the politics of HKS. I regard Dr. Sweeney to be brilliant at computer science, the foremost authority on privacy in technology, and had a vision to build the FB Archive on the base of a data sharing platform that she had designed previously. Dr. Sweeney recommended that we keep the entire project to a limited number of people on a "need to know" basis. We spoke to Ms. Manley about Shorenstein using some of the Director's funds to bring on more staff. One night in October, Ms. Manley, the TASC program manager, and I worked late into the evening crafting a proposal explaining the project and its goals. This document became the "about" page on FBArchive.org, and was the draft proposal that was given to donors in November and December of 2021.

27. Despite Ms. Manley and Dr. Sweeney's concerns about Dean Elmendorf's closeness to Facebook and my vulnerable non-tenure track position as a staff and adjunct faculty member, I

believed that I had academic freedom and that if any university was fortified against incursion by big tech, it would be Harvard. I responded by saying in an email,

As much as I want not to paint the target, my team would feel awful if they thought I had backed down from this. So let's go ahead with the listing of TASC and I'll roll with the waves.

28. Ms. Gibbs responded to me separately about my message to the dean, she said,

"I assumed Eliot was behind Doug's message— but your response was thoughtful and thorough, and in a way I'm glad for chances to school them on the thoroughness and scholarly rigor of your research. It's gonna be an interesting couple of weeks."

29. We each came to the conclusion that Facebook was creating a fuss with Dean Elmendorf. I responded to her, "Thanks for the vote of confidence. I knew the companies would come for me but I just hate the idea that the dean's office and influential people are saying stuff about "my research" without having read it. Lots of people at FB like my research and use it. But I digress... another day at the office."

30. For the next two months, I was out of office on disability with a particularly serious case of COVID and the meeting with HKS leadership was moved to January 11, 2022.

31. On December 8, 2021, the Harvard Crimson reported that the university would receive a donation of \$500 million dollars by the Chan Zuckerberg Initiative, the largest donation in Harvard's history.⁷ While still hospitalized, I worried a lot about the upcoming meeting and sought advice from Ms. Gibbs, Ms. Manley, and Dr. Sweeney, all of whom believed the meeting was motivated by Mr. Schrage's reaction to my presentation during the October 2021 meeting of the Dean's Council. Ms. Gibbs assured me that Dean Elmendorf is a rational and ethical man and that his reaching out to me was a sign of his respect for TASC's research. I feared the explanation was much more simple: I was being called into the Dean's office for offending donors from Facebook. I believed that a moral or ethical man would also extend some compassion for the person facing backlash because of donor anger.

⁷ <https://www.thecrimson.com/article/2021/12/8/chan-zuckerberg-donates-500-million/>

32. On January 11, 2022, I attended a meeting with Kennedy School leadership, including Dean Elmendorf, [NAME REDACTED] (Academic Dean), [NAME REDACTED] (Academic Dean for Teaching and Curriculum), [NAME REDACTED] (Dean of Research and Policy), Dr. Sweeney, Ms. Manley, and Ms. Gibbs. The meeting was somewhat confusing to me as much of our research was already publicly available and I was asked not to use slides or go into detail. Dean Elmendorf wanted to know more about how we conduct our research and I attempted to explain our methodology of using case studies, but was told not to get into the specifics. Dean Elmendorf interrupted me several times as I answered questions posed and he pressed me about defining misinformation, a well known Facebook talking point. He interrupted my answer saying he did not want to hear details, and yet his questions asked for specificity about how we do our research. So, I told him that there is no way for me to explain our research without pointing towards specific case studies because misinformation and disinformation is best understood as an event with historical examples. It struck me that Dean Elmendorf was frustrated. Dr. Sweeney did offer another answer, explaining that my research is qualitative and anthropological, so it's not as cut and dry as quantitative research. I assured HKS leadership that we employ a rigorous methodology and can substantiate and cite all of our claims, be they about specific actors or algorithms. I left this Zoom meeting with a lot of anxiety that Dean Elmendorf was questioning the integrity of our research with a purpose. I felt that the Dean was digging in an effort to poke holes in the work.
33. After this meeting, Dean Elmendorf followed up with Dr. Sweeney, who passed along his feedback. I still do not know why he did not want to communicate with me directly rather than going through a third party. She told me to bulk up the methodology section of the [Casebook methods web page](#). We made these adjustments and she passed them along to Dean Elmendorf.
34. I became more alarmed as my work became increasingly difficult to perform in a very real way. Following the January 2022 meeting, my program was being starved of personnel and the grants management process ground to a halt. I planned to host a podcast as part of our public engagement efforts, which were part of our grant deliverables. In the podcast, I would conduct interviews with different technology stakeholders, but the Dean's office would not sign the contract, despite the funding already available in an account held by Harvard. I tried to plan for the fall semester by requesting three fellows but despite repeated efforts, I did not receive a clear reply from Ms. Gibbs and Ms. Manley in time. I also put in a hiring request for an event staffer because we were planning a conference in Spring 2023, another grant deliverable, and the FB

archive project was intended to include workshops, but was told by different staff members that my request for a position was “in progress” for months.

35. By Spring 2022, the FBArchive project had slowed to a crawl. Because it was woven into the culture of HKS that anything that touched Facebook was likely to face backlash from Dean Elmendorf. Dr. Sweeney and Ms. Manley were coming up with strategies to avoid upsetting Dean Elmendorf. They drafted a letter that they hoped Dean Elmendorf would send to Mr. Schrage and Ms. Sandberg. Dr. Sweeney wrote to me and Ms. Manley on 04/12/2022:

Hi,

I think more of it as an short email to Doug that recommends a research message to Eliot and Sheryl. Maybe I should send the message to keep it more aligned with the research mission. I would write something like the following. See what you and the others think...

Doug,

one of the groups that can benefit the most from making fbarchive public is Facebook itself. The documents reveal several issues that Facebook struggles with, and for which, the best solutions are not known. They are just open questions. FBarchive provides a perfect opportunity to get a thousand great minds to work on content moderation approaches and other difficult issues Facebook faces. These issues lie at the intersection of technology design and accompanying policy, and so fbarchive makes the environment ripe for research and insight.

If you find it helpful, you might share the idea with Eliot or Sheryl that Facebook may be the biggest benefactor. You might even go further and suggest that they have researchers who work with us in some capacity after fbarchive launches.

--LS

I do not know if this email was ever sent to Dean Elmendorf.

36. By November 2022, I came to realize that Dr. Sweeney was taking the FB Archive on an independent path from our original vision and agreement. This was made clear in a Knight Foundation conference in November 2022, where Dr. Sweeney presented some features of the project – but not other critical components of the project to achieve the public interest goals such as allowing for annotations on the archive itself, collaborative special collections, and support for discussion amongst researchers on the archive.

37. In March 2023, in response to an email from Ms. Gibbs asserting that HKS "owns" all the IP of my work at Harvard, I specifically asked her:

I saw in your press releases a claim that the tech lab will keep the fb archive, but that was never discussed with me and Latanya. I am a partner on that project despite how it was framed in the media.⁸ I don't think it's fair that you told the media the project will continue without interruption as my team plays a large role in the workshops once the tech platform is finished.

38. I forwarded this email exchange to Dr. Sweeney because it involved the FB archive project, she responded on 03/07/2023:

Hi Joan, The email exchange is painful to read, better yet, it is hard to imagine your experience. I am very sorry that you are having these kinds of communications. Take some time to take care of yourself. As you could expect, I have had no conversations with anyone about those issues.

However, I did see that you mentioned FBarchive. I sent you a text message earlier to let you know that we are near the end now (at last!). So, keep an eye out for launch. I will send you messages.

We will compose a history page, as I have done with several of my projects to enumerate contributions. Project history pages usually have entries at milestones and record the people involved and the nature of their contributions. The history page for FBarchive will of course memorialize the contributions made by you and TASC. Examples: the datamap and vote flare.

I know the email exchange you shared can be distorting, especially read out of context. But in terms of IP and FBarchive...

The technological IP (design, architecture, and implementation) in FBarchive belongs to the Lab alone. No one can claim IP over the original content of course, but the Lab also has IP in the redaction strategy used. Your team contributed the citation reference used to identify each image and document, and of course, you were part of the original concept. This is the kind of details that we will document on the history page.

A while ago, the FBarchive Privacy and Safety Board had a discussion about the scope of content and activities related to FBarchive. Here's the jest. Anyone can host workshops,

⁸ <https://www.washingtonpost.com/technology/2023/02/02/misinformation-harvard-donovan-close/>;
<https://www.thecrimson.com/article/2023/2/2/donovan-forced-leave-hks/>

write papers, make podcasts, or host social media discussions about its contents. None of these have to be us, or some of those may be us in our various Lab or Center roles but not FBarchive itself.

Also, FBarchive will not publish summaries on the site itself (though we have assembled topical and subject indices). As we near launch, the Board will revisit, but I think these rules of engagement seem the simplest and cleanest way to avoid Facebook and others believing we have some grip with Facebook or some other agenda. I will keep you and your team members in my prayers as you work through this period.

My hope is that you land somewhere great and do amazing work. Success is the best response. —LS

39. I responded that day to Dr. Sweeney:

Thanks Latanya for this information, The IP issues came up because Nancy had said the school owns all TASC IP. Good to know this does not extend to the FBArchive project too. I was asking for clarity specifically about what IP she was referring to in her earlier email. Happy to know the project does truly reside in your hands alone. That is good news to me. It's been a tough few months, and I'd like to be kept in the loop for the project roll out.

Best,
Joan

40. I still don't quite understand all of the exchanges around IP, only that I created my scholarship with the clear intention to publish open access in compliance to the requirements of grant funding. On March 18, 2023, I specifically asked Dr. Sweeney about the IP issues related to the FB Archive and included it in my email seeking clarification of the assertions of IP ownership being pushed by the Dean and Ms. Gibbs, writing in relevant part:

I did speak to Latanya and she told me that she retains all of the IP for Facebook archive. This is good news as FB Archive and platform accountability will be a focus of fall research papers and workshops. What kinds of IP should I be concerned about here?

41. Beginning in early 2023, Dr. Sweeney was excited to loop me into the progress on her side of the FB Archive project – much of which dealt with developing the archive platform which could be accessed by the public. In early March, Dr. Sweeney told me that the FB Archive was near the end of the prep and could "soon launch". At the start of April 2023, Dr. Sweeney said that the FB

Archive was "near launch". Later that month, Dr. Sweeney advised that everything on our end for the FB Archive was done but she was waiting for "Facebook lawyers to clear."

42. On 05/26/2023, Dr. Sweeney reached out to me to let me know she was launching the FB Archive and wanted my approval for the history page. Not long after a journalist reached out to ask if I had already left Harvard because she noted that the TASC logo and my name was removed from the FBarchive website. I made a few suggestions related to naming the TASC team and another contributor from UT Austin. On 06/02/2023, I sent the following email:

Hi Latanya,

I just noticed my team's name/logo was removed from the FB archive entirely. I'm also not able to sign into the platform and gain access to the documents either.

Can you tell me when I and the TASC team were erased from the project's front page? I ask because you ultimately had to be the one to direct someone to do it.

The internet archive has TASC still up there on March 5, 2023, so this turn was very recent.

I don't believe it is fair that I'm undergoing an immense pressure to leave the school and having my credibility tore apart in the media [examples provided below]⁹, while also being stripped of my name on the work I fought so hard for. Having my team's name removed from the archive is incredibly upsetting to all of us, especially those who took on this risk and lost. I don't know how to explain to them what happened here. It's gutting.

I am very grateful for all the work you put into it to carry it forward while I was experiencing pressure and isolation from the Dean, Nancy, and Laura. I don't mean to put this all on you. I'm asking for some insight, not laying the blame.

To be very clear, I don't know who made the decision to remove me from the meetings, minutes, and the website. Please tell me how that came about.

⁹ <https://www.washingtonpost.com/technology/2023/02/02/misinformation-harvard-donovan-close/>; <https://www.bostonglobe.com/2023/02/03/business/harvard-winding-down-misinformation-expert-joan-donovans-research-over-school-policy/>; <https://www.semafor.com/article/02/02/2023/harvard-joan-donovan-disinformation>

In the fall of last year, I felt as if some decisions were happening under my radar. For example, when [NAME REDACTED] was let go without speaking to me and it was later communicated that it was simply because the project needed more "tech help."

Then, I stopped getting calendar updates or notes from [NAME REDACTED] and my team was no longer included in correspondence. You and I had agreed that some of those meetings were rather pointless and I trusted that I would be brought back in when the launch was happening. I still work here even if no one will interact with me.

I want you to know that absolutely NO ONE communicated to me that I was being removed from the FB Archive, only that it would continue with the tech lab when I left.

I also did not fully understand what you meant with TASC being deprecated to an "about" page. I was confused by that initially because the "about" google doc was somewhat out of line with what happened internally and historically, but now I understand what purpose it serves.

To be clear, the early history is wrong in that document about the initial drop and the chain of events. I'm sure someone has poured over this line by line legally, but we must always come correct. Again, I don't think this was done maliciously on your part, but I do want to know who wrote this history.

Furthermore, no one has the right to erase my name from my research projects. Whether Laura and Nancy like it or not, we agreed to a clear 3 way partnership on this and we SHARED a vision for implementation, resources, and engagement.

Isolating me and deleting my team's name/contribution as a founding partner feels like retaliation. I need you to remember where we began this. Do you recall what I wrote/said on Nov 8th, 2021 when the Dean asked me on what basis am I making public comments about Facebook, you and Laura asked if I wanted to take my name off the project after?

I said that it was important to me to represent this work and see it through. We also planned strategy for roll out with press that was more than simply promoting the archive, but also creating public knowledge about its contents. This plan now seems to be buried.

I want to reiterate that I think it's a waste of public impact to tone down the press engagement because we let down the same groups we aimed to serve with this project in the first place.

I see there is also an intro to the platform for June 9th and I wonder why I had to find out about that like every other participant? Why am I being treated this way?

I hope you understand where I'm coming from, and that you know I do value you as a colleague and friend. This is an awful way to find out that one's own intellectual contribution can be relegated to the dustbin of history. Nancy and JZ both told me that "at Harvard you eat what you kill." And unfortunately, this time it's my spirit.

You know what this feels like so I don't have to describe it to you. Please tell me how did this happen?

Best,
Joan

43. Dr. Sweeney responded on 06/02/2023:

These are two different issues. Let me explain. First, there are a few different FBarchive websites operational at present as we shift from alpha to beta to the public launch and we still have the curtain page too. I was waiting until the History page went live on the beta website to contact you and all the others who have worked with us to get us to this point in order to facilitate your access to the beta website and discuss next steps, but before I did so, I wanted you to see your names and contributions listed on the history page. I was expecting to send the email to you and the others on Monday (when I return from vacation, but I can see if I can get that to you this weekend or later today! It will describe how to get onto the beta platform, etc.).

I suspect when you ask about TASC being removed from the FBarchive website, you mean the curtain page (fbarchive.org). As we transition towards public launch, we want to list the organizations active at that time in the project. In short, the list of direct contributors is not a historical attribution but a contemporary one. This is why the history page is so important because it identifies how the project evolved and who was involved and how at each stage of its journey. I will make sure TASC is named explicitly in the history page as your prior email message identified.

We are making tons of changes constantly, so it is all a moving target. I think the change to the curtain page involving the removal of TASC would have occurred just after the beta launch when other updates had to be made. I am not certain of the date but it was recent. I am not sure what orgs are listed on the current version, but as we move towards the public launch, I would expect New America, Shorenstein, and the Data Privacy Lab to be listed because they are making direct contributions to the public version. Does that make sense? Again, the listing there is not a historic one but a contemporary one.

Joan, I certainly know and understand your pain, but all my projects have followed this same attribution approach of using the history page to document contributions in context and allowing the current version of the project to reflect current activity. A good example is <https://thedatamap.org>. Also, I can definitely assure you that none of this has anything to do with the issues you are having with HKS. In fact, you can be assured that I will make sure you are properly and fully attributed to the FBarchive project, which is why you are so prominently identified by name for your contributions.

You are not being removed from FBarchive. Your important, critical and vital contributions are captured on the History page, or at least that is my intention to forever record that. In terms of moving forward, we need to figure out what you, through TASC or other group, want to do in sponsorship and how to do what you want to accomplish. We can talk about these details next week by phone or in person if you want.

Joan, I have shared the history page with you. What do you consider incorrect? What would you have it say? No one is removing you. But I thought we are talking about TASC and its contribution?

Yes, these are plans we had originally. But things evolved over the year, especially after some discussion with the Privacy and Safety Board months earlier. Commentary about the archive is being kept separate from the archive itself, so this changes some of the mechanics of those original plans but does not prohibit your vision or intended uses. And, you and I have been talking about possible media options; nothing has been decided on media.

I am very sorry Joan because I think I am to blame for the confusion and misunderstanding. I was just following the way I always do projects, but I think the current setting for you gives it an unintended color.

Let's talk!

P.S. The Tech Lab has been the overwhelming contributor to the project as we approach \$1M in people and resources spent and tasks include the platform's design and function. But the concept starts with Frances and you, which I tried to accurately capture on the History page.

44. My response on 06/02/2023:

Thank you for your answers, but I think my point is much more banal.

No one told me or my team that we were no longer active participants. Moreover, hard costs do not dictate who counts as a partner org on projects, contributions do. But if you need an accounting of my hard costs, I can contact [NAME REDACTED]. Has any funding come in for fbarchive? If so, from who? Were they under the impression it was in partnership with TASC?

TASC made many contributions including getting the documents and categorizing them, as well as promoting the archive in public forums, and having my team write testimonies and 1-pagers, reviewing abstracts and holding office hours with students and so many meetings. I do see your point that this is how you've always done projects, but I disagree that we are not active participants.

I have been working with civil society and scholars on these documents (using pinpoint) and many of the invited scholars to fbarchive are people I personally brought to the site. I also disagree that we should have our logo removed especially because under the circumstances it harms my professional reputation as I have been promoting the launch for over a year.

Thanks,
Joan

45. Dr. Sweeney replied promptly:

First, no one told you that you are no longer an active participant because no one is saying that –not me, not the website, no one. What we do have to do, and is the point of the email message to you and others on Monday, is to figure out what you want to do and how we can help you achieve it. The project is now starting its next stage, with development behind us and the public launch ahead. This is exactly the team to memorialize how we got to this point and contributions made in the first stage and to draft what the next stage looks like. In short, what do you want to do?

What does TASC want to do? This would have been my question in the Monday email. But let me know now or let's have the conversation now. As for costs, I mentioned the \$1M figure, in part as a measure of my own pain related to the effort and the time it took.

Of course, not everyone has to provide direct costs, and I think you were incredibly instrumental in providing valuable resources that are not direct costs. For these reasons, it is important that the history statement about the earlier stage provide proper acknowledgement of contributions.

Sometimes you say TASC and other times you say you, but these are not the same. Is there any further change needed to the history document?

I want your spark to shine and for you to make the most of FBarchive and the documents. What do you need or want to do to make that happen in the public release?

I don't understand what harm you are talking about. Everything is still in flux as we move towards the public release and contributions made in getting us to the public release are documented on the History page. I don't know what role you or TASC want to play yet going forward, and while you say you want to be on the curtain page, you have not stated what you want to do in the next step. I cannot presume because so much is in flux at your end, but I am also not presuming the other way (no involvement) either. I am just asking, or would have asked on Monday when I returned from vacation.

What is the level and nature of participation for you? for TASC? Happy to hop on the phone or zoom or meet in person. Whatever works best for you.

46. I took the weekend to cool off and replied to Dr. Sweeney on Monday, June 5, 2023:

I just reached out for a call.

I disagree that changes to the technology should mark changes in partnership to the project. That's a very technocratic way of thinking about progression. I understand that this is the way you've always done projects, but this was a 3-way partnership.

To me that means, we should make bigger decisions together and that the point of all the early work was to get to this point of public release.

When it comes to the drafting of this history page, it is the case that it documents the history from the tech lab perspective. It does not record the longer history of TASC combing through the documents and retrieving information to substantiate the legitimacy of these documents or the decision to make an archive in the first place. That is when I brought the documents to you with the idea of doing a "rap genius" for these documents.

At some point, there was a decision to remove TASC from the curtain page and delete language in the "about" page regarding our partnership. That had to be done consciously. There was also a decision to remove me from meeting invites and from notes emails.

I was under the impression we were in a holding pattern until the platform was worked out and that I would be included just as soon as it was nearing completion. Now I realize that was an assumption.

Best,
Joan

47. Dr. Sweeney responded the same day:

Hi Joan,

Great. I think a phone call does more service to us than email. But I wanted to respond by email promptly in an attempt to help alleviate concerns. There is a lot going on in your message and a lot of confusion, and we do need to unpack it in order to move forward constructively.

With all due respect Joan, I'll be honest. I have no idea what TASC means. I don't know anything about its future, its plans, or its current situation. I am not sure what TASC is or will be. I am not part (and don't want to be part) of any conversations concerning it.

On the one hand, TASC is part of Shorenstein, and as such is include in the Shorenstein listing. But in my heart, TASC is your project that goes with you and gets continued life in your vision. But where is it going? Will it have that name? Even if so, what would TASC be doing with FBarchive? Without some understanding, it seems unwise to explicitly list TASC as an active participant out of historical gratuity and thereby push FBarchive into uncertainty without even knowing the reason for what TASC is doing with FBarchive. If you have some answers, then let's talk concretely and make meaningful plans. When we began, we had lots of ideas that as time has passed are no longer possible in the ways we had envisioned for a host of reasons. So, it is prudent to reassess at this point and see if we can make some of those plans of interest to you work in new ways. I'm trying to make what you want to do possible. That transcends the listing of groups on a website and focuses on actual participation.

Let's do what makes sense in the setting we are in now.

If you have some specific language you want to see in the History page, please send it to me. I thought I added those points but perhaps attributed them to you and not TASC. Please advise.

Joan, if you tell me what you want to do, what you want to make happen with the archive, we can work to make it happen. You had mentioned your hosting workshops or writing commentaries. Is that the kind of things you want to do? Please advise.

--LS

P.S. As for meetings and some kind of secretive exclusion from them, that never happened. I directly communicated with you and said that we have had no or very few meetings and that in the best interest of the interactions that were (are) unfolding between you and the others, it makes the most sense for me to make sure you are kept in the loop through direct communication between us. I have kept my word. As we got closer to the launch of beta, I let you know about progress and delays and kept you informed. As we are drafting the website, I asked you to edit the History page. Even our discussion about TASC's being listed as an active participant is timely as the website is under construction through the beta phase. Today, I will send you a message about how to get on the beta platform and other next steps. There is no conspiracy here or your being kicked out or excluded from meetings or decision-making. I am trying to coordinate plans for the next stage now as I have expressed in each of my email messages to you this weekend. Without knowing what you want to accomplish or do, it is hard to do that. If all you want is what has already been done, then let's make sure it is made clear on the History page. Let me know what you want to do.

--LS

48. I was particularly struck by the claim that I was making up some "secretive exclusion" and "conspiracy" when it was factually clear that I was being excluded from the FB archive meetings, and internal emails purposefully. In my view, these words are just another way of calling someone "crazy" by suggesting their experience is not real. To me, this fit the pattern of isolation and exclusion that had permeated my experience at Shorenstein from Fall 2022 onwards, when Laura Manley cornered my employee and attempted to solicit a complaint about my management. I realized that Dr. Sweeney was not going to relent or acknowledge that I had IP rights to my own project. I was also very hurt that my legitimate concerns had been reduced to making accusations with loaded words implying paranoid behavior.

49. I sent her a response.

Dear Latanya,

I want to start off by apologizing. I think this discussion is going in a direction that I did not intend. I did not mean to imply there was a secretive exclusion, but rather the

opposite. It was a conscious choice to remove TASC and I needed clarity on it. I am not alleging any misdeeds. Granted, I was blindsided by the erasure from the site. Again, I assume no malice.

I get that my tone might come off blunt and/or bruised. Mostly, because I am very confused. I understand that you want me to layout exactly how TASC will participate in the archive going forward. Nothing has changed this end. We have far less people power, but there remains a strong will to dig into the archive and create workshops for journalists and researchers, while also writing up findings. This is why I have sought early access since 2022 so that I could plan ahead. I can't be very specific without seeing what it is.

TLDR;

My bigger issue is one of attribution, collaboration, and citation. Perhaps, I should have prefaced this by saying I was contacted on Thursday by The NY Times asking "why did Harvard remove TASC from the FB project page?" The reporter also contacted a few other TASC fellows believing they got a scoop that I had quietly left Harvard. This is what I mean about erasure harming my professional reputation. Different stakes for me. This was the first time I noticed the change.

I understand I can be a bit muddy about "the who of TASC" as I do represent the research, but there's a much larger group of junior scholars and journalists. Some of the people at TASC prefer to go unnamed as individuals, but as a team we all are sensitive to removal of attribution from the web copy.

TASC is group of researchers and fellows located at Shorenstein, but is not encapsulated as the Shorenstein center. The members of TASC who gave input on the FB papers include [12 NAMES REDACTED]. I don't know who wants to be named explicitly. Moreover, I don't view attribution for intellectual labor as mere "historical gratuity," so much as an issue of fairness.

My disagreement is about the politics of citation between junior and senior scholars and the dynamics of power/control at play within our project. Early on, TASC was approached by [REDACTED] and [REDACTED] to partner with them on the publication of these papers. After discussions with TASC, we believed these men would likely takeover rather than collaborate.

Throughout the first year of working with the tech lab, I was confirmed in this choice as I was excited by your leadership and learned a lot from being in your shadow as I saw the features evolve. I even adopted your teaching model. It was inspiring to be so close to

the development cycles and learn to organize projects from you. Even though this is difficult to discuss, it is helping me understand a rift in citational cultures of technoscience and social science. I could be wrong but this is the divide I see: you view the site's progress from pre-beta, to beta, to launch as markers guiding the project's phases, which determines timeline, use cases, and participation. The website is a living and evolving process, not a product unto itself.

For me, the fbarchive is a major publication/output and the website is where citation/attribution occurs both historically and professionally. Whereas I see this as a last milestone for the TASC team, you are right that it will have associated maintenance and projects built out of it going forward. I think this disciplinary difference of approach is where the misunderstanding is rooted, not in any conspiracy.

Overall, this discussion is an important lesson for me about interdisciplinary collaborations and creating agreements early on. I made the assumption when we wrote out the original "about page" and the funding proposal that there was a tacit agreement to work as partners for the long haul. I understand why you don't want to be involved in conversations about TASC, or even with me about FB archive.

TASC never should have become an issue for you at all. I regret trying to save it when I should have just gotten a lawyer and taken medical leave.

Whatever my regrets, when I felt the brunt of the clampdown from HKS, you were there for me in very important ways. I will always be grateful. I remain very thankful for your mentorship and the work you put into helping me grow through this awful time.

With apologies,
Joan

50. Dr. Sweeney responded on 06/07/2023:

Hi Joan,

It has been a busy day, but I wanted to respond to your message before conceding that this is really the next day (after midnight). Please see comments in context below.

Thanks for sharing what you would like to do. Let's discuss the best ways to make those things happen.

First, you can access the beta version of FBarchive by following the instructions that [NAME REDACTED] sent you on May 26. But I think you had setup an account a while ago but perhaps you have not yet used the system. If you already have an account, and I think you do, go to <https://beta.fbarchive.org> and login with HarvardKey or the email account you setup the account. If the system does not recognize your account, then you can create a new one (see instructions in the next paragraph). If there are members of TASC that you want to have an account, have them follow the instructions that [NAME REDACTED] sent you earlier. I have attached a copy to this email for your quick access. Basically, a person sets up an account, but because access is still limited, they also complete a form to ignite the approval process. For organization, be sure to have them say "TASC".

Access to the beta platform will allow you and TASC members to begin to "dig into the archive." We are asking everyone with access to the beta platform to help us make improvements and itemize some utility the platform enabled. We are having a couple of zoom sessions for discussions. It would be great for them to participate. You are free to "create workshops for journalists and researchers". Please do so! And we hope your workshops will have published findings or other reports. Obviously, once the platform is public, anyone can host a workshop and I hope many people will do so on lots of different topics. We are asking that no one host a workshop until the platform is public. But the beta launch provides a good opportunity to dig in and craft some ideas for workshops.

We don't have a process in place for FBarchive to be the host of a workshop though we just hired a new full-time facilitator (PhD from Harvard Gov) who will help figure all this out and help support workshops and research in the archive. So, if you have an idea for a workshop, you should plan on hosting it yourself but we can help. We have said the same to Shorenstein also.

Heads up! Many months ago, the Privacy and Safety Board came to a stark reality check based on the content of the archive: Facebook has no idea how to do moderation at scale, nobody does, so we don't want any content on the platform that requires moderation. We are encouraging discussions to be on Reddit or elsewhere. We are thinking we will be able to have a list of workshops, papers, and discussion thread locations on the site (more for the new facilitator to figure out). Another heads up! The beta version doesn't yet have tags and a means to configure your own document of images.

That will be added shortly, and certainly before the public launch.

Delighted that a New York Times reporter cared enough to be checking the website so regularly to notice! Says a lot about what a big deal you are. Hope they continue to keep an eye on the archive and even use it (smile).

Happy to list them in the history page and provide access to the beta platform. You can see a link to the current version of the history page at the bottom of pages on the beta platform. When you say that these people gave you input on the documents, I assume you mean with respect to the class. We will ask each of these people if they want to be named on the history page in that capacity.

Yes, conversations started among three of us, but the project evolved and expanded over time. That is the difference between a project and a publication. More than 100 people have worked on FBarchive in a meaningful and productive way over the year or so of effort. Members of the privacy and safety board spent crazy hours on Friday nights sweating details on specific images and crafting the policies that we would follow and shape what those initial ideas would really be. A dedicated group was meticulous in review, re-review, and review again and again of tens of thousands of images. It has been an amazing process and evolution. Tremendous gratitude goes to everyone to getting the platform to the beta version.

There does seem to be some kind of difference here. But I don't think it stems from a technology versus social science perspective because I have worked with lots of social scientists on projects and papers previously. I think the difference is whether we see the effort on FBarchive as a living project or a static publication. This conversation reminds me of authorship conversations on a paper: At first, when the idea for the research paper begins, members of the group have ideas, but then the work gets done and along the way, ideas are reshaped and contributions vary, leading to final discussions about the order of names and in some cases, who should be listed as an author. This is what your statements remind me of, the final attribution for a static production. But FBarchive is not a static publication. We have plans to expand its content, for example. So, If you believe FBarchive is an ever-evolving project whose future is not just maintenance of its current content, then you want a history page to memorialize its phases (list the "authors" at each stage) and allow it to grow and evolve with new and different participants. And even if you think of FBarchive as a source for a static publication, then it has already spun a series of papers. The first would be its original idea, the next paper would be the initial design document, the third would be the citation format, the fourth paper would be the policies from the Privacy and Safety Board, the fifth would be the user interfaces that have been explored, and so on. The authors of each of these papers would be different people. So even if I took a paper attribution perspective, there have been lots of "papers" that are enumerated and described on the history page.

Joan, you are a tough cookie with a lot to offer. You have to find the place and space that will let you grow and shine as big and bright as you can. **When I say I don't want to be involved in conversations about TASC, I mean I don't see how it helps anyone for me or FBarchive to be needlessly engaged in your disputes with HKS.** I don't mind talking to you about FBarchive and other projects and offer you personal cheer and support.

--LS

51. We continued like that for a few more email exchanges, but I had to give up because we were not seeing eye to eye. Moreover, I believe the statement highlighted above was the real reason I was excised from the project. Dr. Sweeney saw me as a liability and that I was the cause of problems at HKS.
52. Later in early September 2023, Dr. Sweeney reached out via text and offered to name me as a "founder" of the FBArchive.
53. I still have not received an answer about who decided to limit, and later expunge, TASC's participation in FB Archive and if there were any donors for the project. I decided not to engage as I do not believe it was fair how HKS, particularly the leadership of Shorenstein, took over and told the press they were going to continue the project without TASC. I see the statements made by Ms. Gibbs to the media about continuing the FB Archive as a tacit admission that it was my project to begin with. Otherwise, why mention it to donors and the press?
54. Admittedly I remain astounded that for most of my time at HKS, senior faculty and supervisors have laid claim to my research, my resources, and my projects. Ms. Gibbs laid claim to FB Archive in the press and to News Leaders internally. She is also representing herself as the Principal Investigator of the DIGI project, another effort I started, which was later usurped by Ms. Gibbs and Ms. Manley. The Belfer Center took millions from TASC and did the equivalent of three zoom convenings and one anodyne report published on the Shorenstein website, with no list of authors, conflict of interest or funding. Instances of Ms. Gibbs and other professors asking me for funding for positions, events, and fellowships unrelated to the underlying proposals was all too common.
55. Throughout June 2023, Latanya held several webinars to train people to use the platform, but I was not involved. Moreover, the credentials I was given for the FB Archive at that time to sign in did not work. On October 18, 2023, I signed into the "Beta" release of the FB Archive by

creating new credentials. I have no idea what impact working with Facebook's lawyers has had on the final product.

56. Furthermore, I was still reeling from her explicitly saying she did not want the FB Archive to get wrapped up in my issues with HKS. I told her my issues with HKS began *because* of the FB Archive. If I had continued to do multi-platform research and had not received the entire cache of Frances Haugen's Facebook documents, I would have likely been allowed to continue my work along with fundraising and rebuilding the Shorenstein Center's reputation with donors. If Elliot Schrage had not become enraged by learning I received the cache and my views on the importance of the documents for researchers and the public, the Dean would never have begun his campaign to lower my public profile which had previously been a boon for HKS. Instead, beginning from that fateful Dean's Council meeting, the Dean systematically set about stopping my work, controlling my speech, ensuring I had no academic freedom and forcing me out of Harvard entirely. Meanwhile, in many news articles, Ms. Gibbs gloated that the Shorenstein Center would keep FBArchive.org and continue researching misinformation.¹⁰
57. What was disappointing about the unraveling of the TASC team is how much trauma could have been avoided if the Shorenstein Center had stood up to Dean Elmendorf and advocated for TASC to continue through June 2024 without the egregious and anti-academic restrictions. Moreover, if minimizing the public impact of the FB Archive project was Dean Elmendorf's true priority, he accomplished that by interfering with the funding, the timing, the original vision and goals, and the accessibility of what has been released as the FB Archive. I was tied up in seemingly endless red tape internally and trying desperately to complete the modest goals listed in [redacted as "**Donor B**"] and [redacted as "**Donor F**"] grants. I also had to balance this with a smart team of veteran and junior researchers alike, which included mentoring many on the job market and personally connecting them to new opportunities. It all became too much to handle and I shut down mentally in July 2023 and took the month off.
58. On October 18, 2023, Dr. Sweeney gave a presentation at the Berkman Center and announced that the FB Archive had launched the day before. Given my concerns about the project, I immediately began searching for news of the FB Archive launching. I could find only one item that mentioned the matter in a Shorenstein Center publication known as the Journalist Resource which drew little attention.¹¹ In fact, the tens of thousands of dollars spent on media consultants

¹⁰ [https://time.com/6324817/managing-ai-social-media-disinformation/;](https://time.com/6324817/managing-ai-social-media-disinformation/)
<https://www.thecrimson.com/article/2023/2/2/donovan-forced-leave-hks/>

¹¹ <https://s.com/journoresource/status/1715014366406279445?s=46&t=AqgVI6i5tsL0CIHookhZ2SQ>

was for naught as there was no public discussion of the archive. On October 19, 2023, I attempted to access the FB Archive with new credentials and discovered that although I was now allowed access, there was no interface for mobile and it was buggy as I was not granted access the following day.

59. As I examined the FB Archive on November 19, 2023, there are no features for collaboration, but search and content tagging are operational. It is not possible to tell if every file or image from Frances Haugen is properly retrievable and displayed within the FB archive. I do not know the extent of the redactions within the database.

60. From the history page of the FB archive:

The Public Interest Tech Lab received an anonymous drop of the internal Facebook documents, which arrived as more than 2,000 PDF files that jointly contained over 20,000 photographic screenshots. Dr. Joan Donovan immediately recognized the valuable insight the documents provided to research on mis/disinformation, the challenges inherent in moderating social media at a global scale, and to public understanding of these phenomena. Seeing an opportunity to use the files to start a dialogue aimed at creating a safer digital environment, Dr. Latanya Sweeney and the Public Interest Tech Lab at Harvard University began the process of designing FBarchive, a first-of-its-kind platform for the public release of whistleblower documents.

With this in hand, the Public Interest Tech Lab and the Shorenstein Center on Media, Politics and Public Policy at the Harvard Kennedy School of Government provided initial administrative and financial support for the creation of a first-of-its-kind archive for whistleblower documents. Media support was provided by the Public Interest Tech Lab, the Shorenstein Center, and the Technology and Social Change Project at Harvard.

61. The history page lists me as a contributor and follows with a long list of outright lies. First, the history page claims the documents were given to Dr. Sweeney's lab by an anonymous source. The subsequent sentence implies that I saw the documents because Dr. Sweeney's lab gave me access, which is untrue. Two years prior on October 16, 2021, I emailed Dr. Sweeney asking her to collaborate on "making a searchable archive of these documents for the public interest." Further, I assembled the initial group that began sifting through and validating the documents

and planning the archive from my own team of researchers and fellows, including bringing on Dr. Amelia Acker from UT Austin, an accomplished information scientist who studies digital archives. Financial and administrative support was provided by my team before Dr. Sweeney or Ms. Manley joined and I continued to provide resources by assigning members of my research team, program manager, and media consultant to attend FB Archive meetings with me throughout 2022. Importantly, the Program Manager for TASC was initially managing the FB Archive calendar and meetings for several months before another administrator was hired by the Shorenstein Center. As a matter of course, this was also not a first-of-its-kind archive for whistleblower documents, as any historian of archives will acknowledge there are many similar archives of whistleblower documents, including the entire corpus of Wikileaks archives to name the most notable.¹² What would have made the FB Archive notable was the collaborative infrastructure that TASC and I thought was coming.

HKS Fundraising: Bait and Switch

62. As discussed above, HKS leadership had become reliant on my ability to raise funds for TASC – and as I learned other uses. Based upon my experience from when I first arrived at Harvard, I was privy to or involved in raising any and all funds that would allow the TASC team to do our work. That, however, changed in 2022 when I learned that TASC’s work and my credibility were used without my knowledge to secure funding for non TASC-related HKS matters.
63. At the end of June 2022, I learned about a grant to the Shorenstein Center of \$5 million from [redacted as “**Donor G**”]. [**Donor G**] contacted me directly to let me know that she was so proud to be supporting my research at the Shorenstein Center. She invited me to New York City for dinner and underscored just how excited she was about funding my research on misinformation. She had also made a documentary film about 2020, featuring a lengthy interview with me and quoted my research. I was stunned because I did not hear about [**Donor G**]’s financial support for my work from either Ms. Manley or Ms. Gibbs. I reached out to them immediately and scheduled a Zoom meeting to discuss the funding [**Donor G**] described me so effusively. I gave no indication to [**Donor G**] about my lack of awareness regarding her generous donation.

¹² https://wikileaks.org/wiki/Leaked_Files

64. Ms. Manley and I discussed this discrepancy and she sent me the gift terms, and emailed me and Ms. Gibbs, she wrote, "Hi Nancy, I spoke with Joan earlier today and she mentioned that she's meeting with [Donor G] on July 13th. Joan said that [Donor G] talked about the gift supporting her work. Have you heard anything about this at all? Attaching the gift proposal that we sent over a month ago for reference. Thanks, Laura"
65. Ms. Gibbs responded:

Hey Laura, I know [Donor G] is a big fan of Joan and sees her as a crucial part of the Center's work— but no, there was never anything about directly supporting Joan or TASC. (Worth checking with [2 NAMES REDACTED], who also discussed gift terms with her.) The only new specific projects we discussed were, above all, the documentary programming, and then the new Student Media initiative.

In addition to core staff/support, we talked using some of the gift for Center research generally, the kind of "venture funding" we could use to launch new projects while we try to build support for them (like we did for Misinfo review). This should be a benefit to all initiative across the whole center. Pretty sure all the various gift terms drafts reflect that but you can check.

Best,
NG

66. When we next met, Ms. Gibbs became very angry with me and asked me if I thought I deserved this money after all the center has done for me. She accused me of having "raised a center in the middle of Shorenstein." I pointed out that I was trying to gain clarity on this specific gift. She then alleged that I had misrepresented my research to funders because I had solicited funding for the same project across multiple foundations. I was shocked by her accusations and seeming lack of awareness that coalition-style funding is preferred by many foundations – particularly for significant research projects. I explained that the funders understand that they are contributing to a large research project called "Casebook", and that all the funders names are listed on the website. In fact, it was the foundations themselves who encouraged me to seek funding in this collaborative way. I reiterated that I was seeking transparency on this particular gift as it was relevant to the fundraising I do for my team. It was reminiscent of confusion over a similar gift in 2019 also from [Donor G]
67. In the winter of 2019, there was a \$300,000 donation by [Donor G] to the Shorenstein Center. During a visit to the Center in March 2019, [Donor G] gave me a hug and said she was proud to

be supporting my research. She said she had sent an "extra check" to the faculty Director, in addition to her annual donation, to support TASC. When I asked the faculty Director about this, he admitted there was a \$300,000 donation from [Donor G] coming into the "Director's Initiative" earmarked for TASC research. He was going to check to see if it had come in. I followed up with him via text the next day, but he only replied to wish me well on a conference presentation. In early April 2019, the Faculty Director left and Nancy Gibbs was appointed Faculty Director in his place. None of the 2019 \$300,000 donation from [Donor G] went to support my work. My experience with the 2021 donation from [Donor G] to the director's initiative, managed by Ms. Gibbs now, repeated the 2019 experience. [Donor G] believed she was supporting my work with her donation, but based on their statements and actions, I understood that Ms. Gibbs and Ms. Manley had no intention to do so.

68. I doubted Ms. Gibbs' explanation as [Donor G] was on the Shorenstein Center's advisory board before Ms. Gibbs or myself joined HKS. Given the enthusiasm and specificity from [Donor G] over dinner, I did not believe that [Donor G] would donate \$5 million without even mentioning my work. When I read the gift terms, certain turns of phrase popped out as representative of my research projects:

"The Shorenstein Center on Media, Politics and Public Policy is requesting \$5 million in current-use funding support as part of our five-year organizational planning and growth strategy to address the Center's mission of **protecting the information ecosystem and supporting healthy democracy**. Given the seismic shifts in our information landscape, **the Shorenstein Center is looking to bolster its current work** and provide new opportunities for faculty, students, fellows, and members of the public to participate in reimagining our press and media institutions for the 21st Century."

"Given the rapidly changing information ecosystem, faculty, fellows, and other researchers at the Shorenstein Center constantly have ideas and opportunities to conduct time-sensitive research projects that require small amounts of funding. A large part of this proposed new funding would go towards establishing a Center-wide research fund that faculty, fellows, and programs can apply to for research support. The fund would allow members of the Shorenstein Center community to support new project ideas, test initiatives, conduct surveys, receive additional support needed to conduct research, hire post-docs to support faculty or program work, etc. This fund would provide essential seed capital to test ambitious research ideas and innovations, with a **particular focus on research that is relevant and applicable to our crises of racism, polarization, and division [emphasis added]**.

69. In fact, on 9/16/2022, when [Donor G] phoned me following a meeting she had with Ms. Gibbs and Dean Elmendorf, she told me that she was very disappointed in the actions of leadership to shut down TASC. She informed me that she had made a "large donation" to support my work and she did not know what the school was going to do with that funding now. She also said that good philanthropists trust those who receive donations, so she was going to wait and see what happens. She offered to introduce me to other Deans and University Presidents, but I did not avail myself of this opportunity because I was consumed with worry about my team, my work, and my ability to meet grant deliverables given the constant bureaucratic blockades that became my new normal at HKS. Frankly, for the first time in my life I wanted to quit and do something else. I felt absolute shame and guilt for having my employees suffer by their associations with me and to the generous donors who wanted to support our work whose funds were being diverted to anything but what they intended.
70. In the week following this incredibly disappointing exchange with Ms. Gibbs and Ms. Manley, I met with Sue Hendrickson, the Executive Director of the Berkman Klein Center for Internet and Society, to discuss moving my team to their center. I was not permitted to make progress in my research and the uncertainty and delay of decisions on staffing and contracts had slowed our pace to a crawl. Ms. Hendrickson expressed confidence that the transition would be possible and that she could get me the same title as Research Director and would work with my funders and Harvard HR to move my research team and funding received to support our work. I was very relieved to have this option open up, although I was aware there were hurdles to get through related to moving a multi-million dollar research operation.

**Democracy and Internet Governance Initiative ("DIGI")
and [redacted as "Donor E"]**

71. Also in July 2022, I discussed the fate of a project called Democracy and Internet Governance Initiative (DIGI) with Ms. Gibbs and Ms. Manley. DIGI was funded by TASC in July 2021 and included a partnership with the Belfer Center at HKS. In July 2021, Ms. Manley was the manager of Secretary Carter's Technology and Public Purpose team (TAPP) before moving to the Shorenstein Center in September 2021. As far as her coming to Shorenstein, I was a big advocate for Ms. Manley as I liked working with her. DIGI was also referred to as "a table" and "a task force" in the details below.

72. Ms. Manley and I initially began designing a "cross-center task force to address disinformation and public policy" in early 2021 after I told Ms. Manley that I wanted to do something big and publicly impactful about internet policy. I met with [Donor E's Principal] approximately a dozen times and traded many emails with him about making a large donation to TASC during the period February- June 2021. One such meeting in mid-March 2021 included Secretary Carter, Ms. Gibbs, and Ms. Manley, where we talked about a potential task force on internet policy. [Donor E] thought this was a good idea, but wanted it to be truly public-facing, complementary (rather than redundant) to his other investments at the Aspen Institute and at Stanford University. [Donor E's Principal] specifically stated that he did not want "another white paper from Harvard."
73. In terms of public facing outputs, I assured [Donor E's Principal] that we would do a podcast to explain why the public needs to care about internet governance. Moreover, we agreed that we must document this moment in internet history as it could be an important factor in solving new problems caused by emerging technology. I said that once we had a solid set of innovative policy recommendations from focus groups and interviews, we would socialize these findings in a report with in-person events in DC and Silicon Valley. [Donor E's Principal] and I also discussed making more multi-media outputs from DIGI as not all people get their information from reading. After the meeting, I wrote an email and suggested to Ms. Manley and Ms. Gibbs that we include a position in the budget for a podcast/video producer on June 15, 2021, I wrote, "I think that 80K or a portion of it could go to a part-time comms person or to an audio/video contractor for a podcast/video series."
74. [Donor E] also stipulated to me that the funding was for TASC and it was my decision to do the taskforce or not. The letter that accompanied his gift also made this explicit. [Donor E's Principal] trusted those he gave funding to and did not seek to guide the research agenda in any way. [Donor E's Principal] always made clear how much he valued independent research and wanted more public engagement with research to guide journalism, policy, and public discussion. He insisted on a strong public communication plan as part of his philanthropic strategy.
75. In a text message on 3/10/2021, Ms. Gibbs asked me about Belfer's role in DIGI (sometimes referred to as the task force or the table):

Gibbs: But is there any risk of them just taking over?

Donovan: Nah because I'm only bringing them in on the table and report.

Gibbs: I love how you roll...

Donovan: Probably 25% or 30% of the gift will go to the "Taskforce"

76. [Donor E's Principal] stipulated on numerous occasions that he wanted the funding to remain in my control, so I worked with him and the Gifts Proposal Advisory Committee (GPAC) to make the gift letter terms reflect a previous gift he made only to TASC. This was the budget I submitted to GPAC to reflect these allocations:

THE TECHNOLOGY AND SOCIAL CHANGE RESEARCH PROJECT			
(\$5 Million APRIL 2021)			
Shorenstein			
Description	Year 1	Year 2	Grand Total
Personnel	\$700,000	\$700,000	\$1,400,000
Professional Services and Events	\$300,000	\$200,000	\$500,000
Travel	\$60,000	\$60,000	\$120,000
Equipment	\$33,333	\$30,000	\$63,333
<i>Subtotal</i>	\$1,093,333	\$990,000	\$2,083,333
Overhead (20%)	\$218,667	\$198,000	\$416,667
Total	\$1,312,000	\$1,188,000	\$2,500,000
Sub gift to BELFER CENTER FOR THE JOINT TASK FORCE ON INFORMATION, TECHNOLOGY, AND PUBLIC PURPOSE			
Description	Year 1	Year 2	Grand Total
Personnel	\$700,000	\$700,000	\$1,400,000
Professional Services and Events	\$300,000	\$200,000	\$500,000
Travel	\$60,000	\$60,000	\$120,000
Equipment	\$33,334	\$30,000	\$63,334
<i>Subtotal</i>	\$1,093,334	\$990,000	\$2,083,334
Overhead (20%)	\$218,667	\$198,000	\$416,667
Total	\$1,312,001	\$1,188,000	\$2,500,001
GRAND TOTAL	\$2,624,000	\$2,376,000	\$5,000,000

THE TECHNOLOGY AND SOCIAL CHANGE RESEARCH PROJECT (\$5 Million SEPT 2021 Contingent on Funder Interest)			
Shorenstein			
Description	Year 1	Year 2	Grand Total
Personnel	\$1,800,000	\$1,800,000	\$3,600,000
Professional Services and Events	\$200,000	\$200,000	\$400,000
Travel	\$50,000	\$53,334	\$103,334
Equipment	\$33,333	\$30,000	\$63,333
<i>Subtotal</i>	\$2,083,333	\$2,083,334	\$4,166,667
Overhead (20%)	\$416,667	\$416,667	\$833,333
Total	\$2,500,000	\$2,500,001	\$5,000,000
GRAND TOTAL	\$2,500,000	\$2,500,001	\$5,000,000

77. On March 29, 2021, Ms. Gibbs brought up in an email that there was no "rent" allotment for additional staff. Ms. Gibbs also suggested adding some of Dr. Sweeney's salary to the budget because it would come out of the overhead of HKS. Finally Ms. Manley requested that 8% be taken off the top of the [Donor E] gift for Belfer overhead while Ms. Gibbs requested another 8% be taken off the top for Shorenstein. These costs combined with HKS' customary 20% gift fee would mean overhead from the gift would use up 36% of the gift funds before work was even started. This hedging for more funding was disruptive to the internal process and made me worry that if we were having this many issues now, what was to come when the research work actually started?
78. At one point, Ms. Manley, who was working for the Belfer Center at the time, asserted that "The good thing about a gift is that it can be spent down pretty much as we see fit, especially if there aren't any reporting requirements. I can work up an internal spend down budget separately, if helpful!" I called her to address this. [Donor E's Principal] made clear from the start of the proposal discussions that any funds he would provide to HKS was for TASC and could only be used for purposes at my direction. [Donor E's Principal] explicitly reminded me and others involved from Harvard of this throughout the process. The Belfer Center did not seem to understand or remember the clear terms of the gift. In fact, the title of the fund was "[Donor E] Gift Fund for TASC."
79. I received this email from Ms. Gibbs on 4/2/2021:

Hi Joan,
Almost there!

I gave [NAME REDACTED] a thumbs up, but I have two questions for you, just so I'm clear.

First, this asks for \$10m to fund work over two years. I had thought we were saying \$10m was for 4 years, and if we only got \$5m, that would be 2 years.

Second, while I'm glad the "initiative" includes more than the task force, (I.e. The J school outreach, DRN etc) does that make things complicated with Belfer? Does ash think the \$10m is just for the task force? Or how would we split the grant between the centers if it includes a bunch of stuff that Belfer is not part of? I know you've been threading this needle carefully, so I just wanted to understand your thinking.

Step by step....

Hoping you have a great weekend,
NG

80. I responded on 4/3/2021:

Hi Nancy,

All good questions. [Donor E's Principal] had initially asked TASC for a proposal for the consortium, which is how our first meeting came together with me, you, and [NAME REDACTED] on March 8. After that, I sent him a concept note for \$20 million over 4 years. He asked for a more specific plan related to moving policy. Laura and I had already been talking about a Taskforce, so I brought her in and she got Ash to agree to a meeting. After the meeting with Ash, [Donor E's Principal] asked for a letter just about the taskforce, so we sent a letter asking for \$10 million for 4 years.

At that point it was difficult to tell what [Donor E] wanted to fund and at what level. Last Friday, [Donor E's Principal] came back saying he was willing to fund Shorestein at \$5m now and \$5m in September, but that it's a gift and **it's up to me** how to spend the money. He liked the idea of the taskforce but didn't want it to run for 4 years and he believed it could be done for \$3 million based on the cost of the Aspen Commission.

[Donor E's Principal] also said I could choose not to do the taskforce and I responded that it's a crucial part of research. He said if I wanted \$10m that he would be willing to send that much as long as a significant proportion of the money to go to bringing together disinformation research and journalism.

Following that conversation, I spoke with you and Laura and said that the money will come in at \$5 and \$5, but that [Donor E] wants it mostly to go to the consortium (which we are now calling an initiative) and that I am going to participate in the Aspen

commission in the meantime. Over last weekend, Laura and I created the budget that went to GPAC and we decided that we would just send [Donor E] the final gift terms and not create another concept note. As far as I know, Ash has been updated along the way. Ash knew that we were baking the taskforce into a bigger proposal with Shorenstein. \$2.5 million should be MORE THAN ENOUGH to fund the taskforce for 2 years.

As well, I don't want to set the expectation that the other \$5m is a done deal. It's not. If Aspen goes up in flames, the degree to which I'm involved will influence [Donor E] decision to continue funding TASC. There's a lot I can not control. So if you do talk to Ash, let him know the money was and continues to be at [Donor E]'s will. Which means, Belfer should also do some fundraising on the taskforce too. We will continue to ask other donors for more funding too. Because the [Donor E] funding is a gift, it doesn't matter how it gets spent or when. The reason why the gift terms say a lot of different things isn't to say we have to do them all, but rather to say we can choose to work in these streams. It's binding in the sense that we cannot spend the money on researching gene editing because that is an entirely different topic.
[...]

81. [Donor E's Principal] said if things went smoothly with the first donation we could resume discussion about the second \$5 million in September. The second installment now predicated on our use of the first installment.
82. After [Donor E] sent \$5 million to TASC, a sub-gift of \$2.5 million went to Belfer pursuant to an MOU between Shorenstein and Belfer, and TASC received a return of \$653,554 to cover TASC staff's percentage of effort on DIGI. All of us were to share expenses on other budget line items, such as research assistants, travel, and media, when the need arose.

83. This is the budget approved by Ms. Gibbs and The Belfer Center on June 30, 2021:

Democracy and Internet Governance Initiative Budget						
Expense	Description	2021 (6 Months)	2022 (12 Months)	2023 (6 Months)	TOTAL (24 Months)	Amt to send to Shorenstein
Personnel						
Belfer						
Salaries		#####	\$ 319,000	\$ 159,500	\$ 638,000	
Fringe and Benefits		\$ 59,714	\$ 119,427	\$ 59,714	\$ 238,855	
Shorenstein						
Salaries		#####	\$ 186,750	\$ 78,000	\$ 407,250	\$ 407,250
Fringe and Benefits		\$ 50,884	\$ 60,724	\$ 25,770	\$ 137,378	\$ 137,378
Shared						
Interns / PT RAs		\$ 48,837	\$ 83,720	\$ 34,883	\$ 167,440	
	Personnel Subtotal	#####	\$ 769,621	\$ 357,867	\$ 1,588,923	\$ 544,628
Contractors						
Production and research support	<i>Media, Website, Subject Matter Experts,</i>	\$ 46,375	\$ 79,500	\$ 32,582	\$ 158,457	
	Contractors Subtotal	\$ 46,375	\$ 79,500	\$ 32,582	\$ 158,457	
Programming						
Task Force Sessions	<i>Venue, food, accommodations</i>	\$ 29,167	\$ 50,000	\$ 20,833	\$ 100,000	
Equipment, printouts, etc.	<i>Supplies for convenings</i>	\$ 8,750	\$ 15,000	\$ 6,250	\$ 30,000	
Other	<i>Networking, hosted public talks, etc.</i>	\$ 15,000	\$ 15,000	\$ 20,000	\$ 50,000	
	Programming Subtotal	\$ 52,917	\$ 80,000	\$ 47,083	\$ 180,000	
Travel						
Flights, hotels, ground transportation	<i>DC trips, West Coast site-visits</i>	\$ 17,500	\$ 30,000	\$ 12,500	\$ 60,000	
	Travel Subtotal	\$ 17,500	\$ 30,000	\$ 12,500	\$ 60,000	
	DIRECT COST SUBTOTAL	#####	\$ 959,121	\$ 450,033	\$ 1,987,380	
Belfer Center Admin		\$ 30,787	\$ 56,932	\$ 27,701	\$ 115,420	
University Overhead (20%)		#####	\$ 191,824	\$ 90,007	\$ 397,476	\$ 108,926
GRAND TOTAL					\$2,500,276	\$ 653,554

84. Also on June 30, 2021, the day [Donor E] was supposed to have wired the donation, I received an email from [Donor E's Principal] that said "extreme bureaucracy" was holding up the transfer. Ms. Gibbs sent an email to [Donor E's Principal] on 7/1/2021:

Dear [Donor E's Principal],

Hope all's well. I understand there is some concern at [Donor E] about the signed gift terms; like you, I'm eager to resolve this so we can move ahead with this crucial work. **As you know, we anticipate using every penny of this important gift for Joan's work, so if there is anyone at [Donor E] you'd like me to talk to, I'm happy to call them [emphasis added].** As ever, I'm grateful for your vision and generosity in making this happen. I could not be more committed to the success and impact of this work.

Warmly,
Nancy

85. On July 2, 2021, [Donor E] wired \$5 million to support TASC. Within the gift terms signed by Dean Elmendorf and [Donor E's Principal], an unspecified amount was going to be dedicated to forming a joint "taskforce" on Information, Technology, and Public Purpose, later to be renamed the Democracy and Internet Governance Initiative (DIGI), in partnership with Belfer Center.
86. The relevant clauses in the gift terms contract read as follows:

The Gift of [Donor E] to the President and Fellows of Harvard College ("Harvard" or the "University"), a Massachusetts educational, charitable corporation, for the benefit of the John F. Kennedy School of Government ("Harvard Kennedy School") establishes the current-use [Donor E] **Fund for the Technology and Social Change (TASC) Research Project.**

[...]

The primary purpose of the Fund is to advance Harvard Kennedy School's research on misinformation, including how to detect, document, and mitigate media manipulation campaigns. Activities the Fund may support include but are not limited to the Shorenstein Center on Media, Politics and Public Policy's Initiative on Information, Technology, and Democracy; the Belfer Center for Science and International Affairs' Taskforce on Information, Technology, and Public Purpose; faculty, student, and staff research; events, convenings, conferences, seminars, workshops, lectures, and meetings; travel; communications; curriculum development; publication and dissemination efforts; pre- and post-doctoral fellowships; visiting fellowships; internships; and administrative costs including but not limited to staffing and general operations.

[...]

If, at some time in the future, the designation of the Fund is no longer appropriate, the Dean of Harvard Kennedy School, in consultation with the Donor, may direct the Fund to another purpose at the School. However, if for any reason this consultation **cannot** occur, the Dean has the discretion to direct the Fund to a project or purpose deemed to be best in keeping with the Donor's intent. [emphasis added]

87. To my knowledge, Dean Elmendorf never sought a consultation with [Donor E] for the use of the gift funds used outside of TASC. Given that TASC is now shut down, the terms cited above require that such a consultation should be sought with regards to the use of the unspent gift funds. Moreover, I later learned that on July 13, 2023, when Ms. Manley and Ms. Gibbs presented a white paper to [Donor E's Principal] and attempted to raise more funds from

[Donor E], they neglected to disclose that millions of dollars of his original gift to support TASC still remained unused in HKS coffers. Moreover, they did not inform [Donor E] that they were terminating the TASC project and laying me off as of August 31, 2023.

88. Ms. Gibbs sent this Memorandum of Understanding to the Belfer Center to underscore what this funding was going to be used explicitly for DIGI research and not as unrestricted gift funding by the Belfer Center:

MEMORANDUM OF UNDERSTANDING (MOU)
for the Democracy and Internet Governance Initiative
Between Belfer Center for Science and International Affairs and
Shorenstein Center for Media, Politics and Public Policy

SUMMARY

The Belfer Center for Science and International Affairs ("Belfer") and the Shorenstein Center for Media, Politics and Public Policy ("Shorenstein") secured a gift of \$2,500,000 from [Donor E's] in June 2021 to carry out work for the Democracy and Internet Governance Initiative ("DIGI") over 24 months.

This MOU outlines an agreement between the Belfer and Shorenstein Centers on how the funds will be distributed and spent down.

TRANSFER OF FUNDS

- Shorenstein will receive the gift of \$5M from [Donor E] in summer 2021.
- Shorenstein will transfer \$2.5M to Belfer for the DIGI within 30 days of receiving funds from [Donor E].
- Belfer will transfer \$653,554 back to Shorenstein to cover the cost of their personnel and fringe within 30 days of receiving funds. See attached budget for the DIGI budget and associated expense categories as agreed upon by both Belfer and Shorenstein.

COVERED EXPENSES

The Belfer Center will be responsible for the following expenses related to DIGI:

- Belfer personnel and interns and associated fringe rates
- Contractors (e.g. media/production specialists, graphic design, research support)
- Programming-related expenses and supplies (e.g. space rental, equipment, catering, travel)
- 8% Belfer administration fee on the direct costs being spent by Belfer
- 20% University overhead on the direct costs being spent by Belfer and Shorenstein

The Shorenstein Center will be responsible for the following expenses related to **DIGI**:

- Shorenstein personnel and associated fringe rates
- 20% University overhead on the direct costs being spent by Shorenstein

REPORTING

- For any changes to expenses that exceed 10% or more of any original budgeted line item, both Centers must approve.
- For any new expenses that were not included in the original budget both Centers must approve before purchases or commitments are made.

TRANSFER

This MOU may not be assigned or otherwise transferred to another organization, in whole or in part, without the express prior written consent of the other organization.

IN WITNESS WHEREOF, this MOU has been executed by the duly authorized representatives of the Parties on the day, month and year first written below.

The Finance department informed me that this agreement was executed and the funding could be released as specified in August 2021.

89. When the DIGI project was announced, I learned that my role at DIGI was reduced to essentially just a collaborator rather than a co-chair with Ms. Gibbs and Secretary Carter. When I sought support in this unexpected change of circumstances, I came to realize no one would support my having a meaningful role in DIGI. This experience was indicative of a future pattern of dismissiveness, taking credit for other's work, and obstruction that plagued the entire DIGI project.
90. In September 2021, DIGI began preparations for its first zoom conference to address misinformation and public policy. The invitations drafted by the Belfer team did not include any mention of the TASC project and was overwhelmingly cut from the same cloth, established white men, rather than a diverse set of relevant participants across professional sectors. TASC had to argue for inclusion of Black, Indigenous, people of color, and LGBTQ+ representation at the convenings, especially when assigning presentation roles.
91. I did not go to **[Donor E]** for the second \$5 million in September 2021 because I did not personally see significant progress happening with DIGI. I was embarrassed at how quickly it all fell apart and was turning into the most expensive project I've ever been part of with the lowest quality outputs. Over the next few months, I was very disappointed with the management of DIGI and felt the project was rather irrelevant because it lacked any meaningful public

engagement or academic rigor befitting a large-scale research project – and one of the initiative’s primary objectives.

92. Although TASC was responsible for fact-checking, review, and some research for DIGI, I was not permitted to attend DIGI research meetings with Belfer staff. I would later learn that the meetings were not geared toward producing the research needed for DIGI’s success. Given the representations and assurances made to [Donor E], I found this to be troubling mismanagement of resources.
93. One of my team was permitted to attend Belfer research meetings for DIGI and told me in January of 2022 that the research team was tasked with doing research for a different purpose and were not focused on culling policy recommendations from new internet studies research. Nevertheless, I continued to ask for permission to join the DIGI research meetings, and was consistently rebuffed and denied access by the interim director after Ms. Manley left Belfer to join the Shorenstein Center.
94. I told Ms. Gibbs about my concerns and the conflict between the intent of the funding and the use of the funding in February 2022 and her suggestion was to leave it alone. At one point, I was told by Ms. Manley that Belfer could "just take all the money because the gift terms don’t state your name". Obviously this was in direct contradiction to the explicit assurances Ms. Gibbs made to [Donor E’s Principal] himself. There was an imbalance of commitment to the success of DIGI as the stakes were much higher for me than for anyone else associated with DIGI as I had personally brainstormed the vision for the [Donor E] gift with [Donor E’s Principal]. Moreover, funders speak to each other often and I was horrified that DIGI took \$2.5 million out of circulation within the field, but could not produce anything publicly noteworthy. This was shameful for me professionally, and for the larger institution – but I was seemingly the only one who constantly worried about our integrity in effectively and properly using donor funds as intended. One of the major goals of the DIGI taskforce initiative was to create a robust and informed public dialogue about internet policy. The TASC team developed the podcast I had previously discussed with [Donor E’s Principal], and worked to achieve the deliverable beginning in January 2022.
95. All efforts to produce the podcast were denied by Belfer and I finally began to understand I was being manipulated into leaving the project and discouraged from raising an issue.
96. As a result of redirecting the use of the research team and restructuring focus groups into large convenings, the DIGI team did not gain much, if any, new insights from the convenings or the

briefs. If we had organized the experts into focus groups during phase one as planned, we would have a robust set of new data to draw upon for phase two and for written reports. Moreover, if we had produced policy briefs based on innovative research from the field of internet studies and analyzed the growing body of international policies about technology, we would have had ample material from which to produce truly innovative and meaningful findings.

97. By the end of July 2022, I was emotionally, physically, and mentally exhausted and beaten down. I realized that at virtually every turn, the HKS bureaucracy was stalling or halting our work. For example, I had tried and failed to bring on a new events staff member to fulfill a grant deliverable of holding a convening and I was being ignored by the administration whenever I inquired on the matter. In another example, even though I was now going to fund the podcast outside of DIGI, the podcast was now in limbo with the HKS administration, who had questions about the content and contract. I would soon learn why my work had ground to a halt.
98. After October 24, 2022, Ms. Gibbs became the lone chair on the DIGI project. I suggested to her that we actually deliver on the donor's expected outcome. I explained that DIGI was rudderless and several of Belfer's research assistants asked me confidentially for help because they were feeling lost. There remained over \$1 million dedicated to DIGI under Belfer's control. Ms. Gibbs told me she reached out to get a handle on what was happening. Later in December 2022, Ms. Gibbs finally got an answer from the Belfer Center on the status of the funding. Ultimately, the Belfer Center denied her, the sole co-chair, control of the DIGI budget and had allocated it to another tenured professor at the Belfer Center. I never heard another word about DIGI after this. Currently, on the Shorenstein website, DIGI is listed as an active program, where Ms. Gibbs is the sole principal investigator. There is no mention of funding past or present.
99. Dean Elmendorf himself informed me that he was the one now blocking the podcast, among other restrictions. On August 24, 2022, I had a one-on-one 45 minute meeting with Dean Elmendorf that made everything clear. During most of the meeting, he was reading from a pre-written script and appeared to deviate very little from what was on the paper in front of him. He opened the meeting by telling me that HKS was going to create a tenure-track position in information and democracy, and that I was welcome to apply for the job. He said, "there is no guarantee you will be hired. It will be an international search." I thanked him for the opportunity to apply.

100. Then, he informed me that at his direction and **supported by Nancy Gibbs and Laura Manley**, the Kennedy School will be "winding down TASC". He told me in no uncertain terms that if my team were smaller, he could "ignore" us. However, he continued, because I had become "too prominent", he had to "wind it down". He said he was not going to approve any expenditure or hire that "increased my public profile." He stipulated that I could (a) not start any new projects, (b) hire new people unless I lost people from my team, and (c) that I could no longer fundraise. As a direct result of these restrictions, I was not going to be able to raise any funding for the FB Archive, hire new staff to conduct research within the archive, or conduct workshops to teach others' how to navigate the archive.
101. He said there was an HKS policy in the faculty handbook that said "only tenured faculty can run projects." It was common knowledge at Harvard and at many other Universities that this rule could be waived by the Dean – and in fact in numerous prior fully executed grant agreements, I was clearly named as the director of the projects proposed. He informed me that he would support me transitioning to another position outside the university, but he specifically stated that he would "**not entertain the notion of giving the funding back to [the first name of Donor E's Principal]**" (emphasis added). At that time, I had approximately \$3.1 million dollars in gift funding from [Donor E] in an account operated by Harvard. Dean Elmendorf told me that if I left Harvard, an action he supported, [Donor E's] gift funding would remain at HKS because it was the property of the presidents and fellows of Harvard.
102. When I was hired as a project director in December 2018, I was never told, implicitly or explicitly, that only tenured professors could direct a project. While I understand that such an overarching policy does exist, it is my understanding that exceptions to this general rule are routinely granted at Harvard, which was true in my case.
103. This was devastating. The Dean was obviously not going to allow me to do any meaningful work or use any of the research funding I raised based on these many new restrictions. I could not feasibly apply the millions of dollars in research funding I had raised for the purposes intended, if I could not hire staff or start new projects. Moreover, it was going to be impossible to complete on-going projects without hiring flexibility.
104. At this point I was painfully aware that in raising money to do the mis- and dis-information research that was more important than ever post-insurrection and pre-2024 elections, I had vouched for HKS as a reputable institution which would responsibly house and enable this work. In my commitment to ensuring this research would be done pursuant to a rigorous,

transparent and objective approach, I had secured over \$12 million in funding from major foundations. When I realized this work would not be permitted to happen, I was deeply humbled and my pain for the field of researchers whose funding had been reduced was gut-wrenching. With the horror of these realizations, I asked Dean Elmendorf what had changed in my relationship with HKS. I said I was hired as project director and had up to that point been freely allowed to operate managing my projects with Dr. Latanya Sweeney as my co-principal investigator (a designation that allows for the management of grants.). As I sat at his table sobbing, he briefly deviated from his script to explicitly say in a patronizing manner, **"I want you to know that you do not have academic freedom."** I asked, "what was that supposed to mean?" He replied, "I want to remind you that you're staff here."

105. At that moment, I recalled the prior sequence of events beginning with the Dean's Council meeting when Elliot Schrage became enraged over my statements and possession of the Facebook Files. The email from the Dean shortly thereafter where he questioned my methodology for the first time, specifically focused on Facebook, the announcement of Harvard's largest gift ever from the Chan-Zuckerberg Foundation, which must have been months in the works, the consistent concerns by my colleagues to frame anything that may upset Facebook in ways that could appease the Dean and my colleague's surprise and concern upon discovering how very close a relationship the Dean maintained with Sheryl Sandberg. I realized he must mean that he would no longer allow me to do any work given the possibility my work could upset Facebook. Dean Elmendorf would starve my team of staff, funding and bureaucratic approvals to control what we could do at HKS and if Facebook decided to sue over the FB Archive project that Dean Elmendorf was not going to protect me in any way – least of all any academic freedom I thought I had at HKS. At that moment, I was intimidated into submission and I was afraid for my team, my career and my family since the Dean was clear that he would not hesitate to use any avenue he could to control and silence me and the entire TASC team.

106. Then apropos of nothing, Dean Elmendorf said that people may disagree with his decision and think he was mistaken for letting go of TASC, but that he has dealt with criticism before and he was not worried about his personal reputation. I was confused by the proactive defensiveness of this statement because I had not asked a question about that.

107. I did ask him if Ms. Gibbs and Ms. Manley knew about this decision, to which he replied they supported this decision. I told him that I hoped to move my team to another center, outside of HKS, so that I could continue working with my team and using my funding. He asked which

centers, and in complete candor, I told him I was already in conversations with the Berkman Klein Center at Harvard Law School and Latanya Sweeney had mentioned moving TASC to her Data Privacy lab in the Institute for Quantitative Social Sciences (IQSS).

108. I tried to stress to Dean Elmendorf that my mission was the same as that presented publicly by Harvard University: "to share the light with the world." When he took aim at diminishing my public reputation, he was really preventing public access to TASC research and obstructing the fundamental academic right to inquiry.

109. What I found particularly threatening and resolute of the Dean's intentions was that he concluded the meeting by saying, "If anyone can come back from this, my bet is Joan Donovan." To me, that underscored the gravity of the action they were taking against me. He was deliberately rendering me unable to conduct essential research and taking every action he could think of to silence my voice as a researcher at a time where it mattered the most for the public and for policy makers – including denying access to the funds raised to do the work. I understood that this "wind down period" would consist of continual blockades using bureaucratic red tape, increasing restrictions for me and my team and anything else he could think of to render me unable to exercise discretion over my budgets and to put me on the bench until he could force me out involuntarily or through sheer misery.

110. In fact, I have never received clear communication about any of my budgets or funding balances from Harvard despite asking the Shorenstein Finance Director and Human Relations repeatedly over the years. I was led to believe this was due to one finance manager who was let go for incompetence in 2022, and the most recent finance manager complained of being too understaffed. I have not been allowed to audit the expenditures on my grants or gifts at any time by Harvard – other than one oversight process driven by [redacted as "**Donor F**"] in Spring 2022. Particularly, as this "wind down process" went on, neither HR or the finance manager would provide itemized budgets or projections.

111. After the devastating meeting with Dean Elmendorf on August 24, 2022, I called Ms. Manley when I got to my car. I was heartbroken and crying uncontrollably. The Dean had succeeded in making me feel that my career was over and I was utterly terrified for my staff, who were in need of contract renewals, stable employment and healthcare. Many were coming up for a contract extension, but I did not know what was going to happen to them and feared the worst. Ms. Manley told me she had no knowledge of the Dean's plan and she asked me what I was going to do.

112. Because Dean Elmendorf had explicitly told me Ms. Manley and Ms. Gibbs supported his decision and because of the false tone of her denial, I no longer believed her. I informed Ms. Manley that the Dean told me she knew and she expressed shock. In answer to her question, I told her I planned to move my team to another center at Harvard, outside of HKS, because I did not want to lose millions in research funding to be misused or diverted in ways directly contradicting donors' intent. She suggested I leave Harvard entirely or start a non-profit. I also perceived that her close association with me could become problematic for her if I remained at Harvard. At the end of our conversation, Ms. Manley said she was going to get to the bottom of the issue, but had never heard of the rule that Dean Elmendorf was referencing as the pretext for "winding down" TASC.
113. Given the events of August 24th, I was troubled by a situation that occurred earlier that month. In the beginning of August, Ms. Manley, Ms. Gibbs, and I went to New York to visit a donor and Shorenstein Board member at his home. We had an informative conversation and the donor told me to submit a proposal for more research funding. When we left, Ms. Manley and Ms. Gibbs told me I should ask for \$20 million because as Ms Manley insisted "he can afford it". I thought that was too much and said so. Ultimately, I did not submit any proposal because I was increasingly frustrated by the lack of support by HKS to my team's staffing needs and contracts. Now, I wondered if Ms. Manley and Ms. Gibbs knew about my impending termination when they had been actively encouraging me to make this exorbitant fundraising ask.
114. I was designated as a principal investigator on December 12, 2019 by the leadership team of HKS, which came in the form of an email from [NAME REDACTED], the Academic Dean wrote:

Dear Joan, We were delighted to learn about your important work through the proposal to [Donor E] . I am sorry for my late response but it took us a bit to figure out how to resolve the question of PI-rights (which we normally cannot give to an adjunct faculty). We have now come to the conclusion that we should grant an exception in this case and allow you to be the PI for the [Donor E] proposal (with oversight from Nancy as the center director). We wish you the best of luck! [ACADEMIC DEAN'S FIRST NAME REDACTED]

115. This email was in reference to an initial gift from [Donor E] for \$1 million to the TASC team in the winter of 2019. In conversation with [ACADEMIC DEAN'S NAME REDACTED] during the fall of 2020, we renegotiated the rules for my PI-status. I reiterated my position that I

would not stay at HKS if my name was not on my funding. I witnessed exploitation of research funding from others and knew that if I did not have my name on my budgets then I did not have any claim to it if something went askew. On December 16, 2020, after several conversations with [ACADEMIC DEAN'S NAME REDACTED] to discuss my PI-status, we arrived at another agreement, which was summarized in an email from [NAME REDACTED], the Senior Associate Dean for Research and Policy, he wrote,

Hello Joan, Latanya, Nancy and Setti – I hope this note finds each of you well as we push towards the end of this week and the blessed University holiday break. I am writing at the request of the academic deans' office to document the agreement for Joan and Latanya to collaborate going forward as co-principal investigators in new Technology and Social Change sponsored proposal submissions and in new project implementation.

My high level understanding of this arrangement is detailed below. [Disclaimer: I have not been directly involved in all of the earlier discussions, so I may get some of the details wrong. If so, please jump in with any material corrections.] The School's hope and expectation is that the Co-PI structure for TASC would be mutually beneficial and would have a positive impact on the various TASC research and training efforts and in the project's broader impact. We would hope for synergies to emerge across the breadth of the co-PIs' work, including as Latanya begins to establish the brand new Public Interest Technology Lab at the Shorenstein Center. Most of our sponsors, including those for TASC, require completing forms and other grant materials that include the designation of a single, lead PI. Internally, Harvard's grants management system (GMAS) also requires naming a lead PI in several places. In such cases, we agree that Joan would be named as PI and Latanya as co-PI.

In the accompanying proposal narratives and budget justifications as applicable, Joan and Latanya would agree on a description of an appropriately robust co-PI project leadership structure. Other aspects of this arrangement would be determined by mutual agreement of the co-PIs, with an eye for what might be most meaningful and feasible. Effective immediately, this agreement would apply to all new and competing renewal TASC proposals going forward, would remain in place until June 30, 2022, and would be renewable thereafter, based on mutual agreement. Please let me know if you have any questions. Thank you.

Best wishes for the holidays to one and all.

[NAME REDACTED], Senior Associate Dean for Research Policy and Administration

116. This was the agreement that was **still** in effect when I met with Dean Elmendorf on 8/24/2022.

117. Before I called Ms. Gibbs on August 24, 2022, I looked up the policy that I was supposedly violating in the faculty handbook about "Principal Investigators", it read,

Every external proposal must have a faculty principal investigator (PI). The PI must signify his/her willingness to undertake direct, active responsibility for seeing that the proposed work is carried out according to the terms, conditions, and policies of both the sponsor and the University. The principal investigator must be centrally engaged in a project in ways that are reflected in the proposal budget as well as proposed activities. Only individuals with full-time Harvard faculty appointments or others explicitly designated by the Dean may serve as principal investigators.

I realized then that the Dean had succeeded in causing me to question my own understanding of the rule. Thankfully upon reviewing it again, it became clear to me that the Dean had decided to retroactively remove his designation to justify his actions, but would not say as such.

118. When I got home that day, I called Ms. Gibbs and asked if there was anything that could be done to salvage the TASC funding as I had millions for research in the Harvard bank. She said that the writing was on the wall for months, but I must have missed the signs. I asked her when she heard about this, and she told me Dean Elmendorf did not consult her. I told her he said otherwise and like Ms. Manley, she expressed surprise. Then in an abrupt change of subject and tone, she made a request that I "leave behind News Leaders," an educational program funded by the **[Donor F]** where the TASC team educated news executives about our research. Ms. Gibbs liked the program because it allowed her to rub elbows with her former colleagues in newsrooms. It was clear from the sharp pivot of the subject that not only did she know this was coming but that she was already planning to take over one of my impactful programs. It was such a deep betrayal. I hung up the phone and ran to the bathroom vomiting. I screamed and cried into a pillow all afternoon and finally went to sleep after taking medication for panic attacks. Nancy continued to send me texts that day and night saying that "Sorry— don't know what happened but we got disconnected. I'm really sorry you're having to sort through so many weird and conflicting signals. I think this is all still unfolding, and there are a bunch of things I'm going to try and get".

119. On August 31, 2022, I contacted Jen Goodman with Human Resources to learn more about my rights. My email read, "Hi Jen, I'm having some issues with upper management changing the terms of my employment and I need to document it. Can we talk tomorrow?" My biggest fear was that even though I was told I had time to "wind down," I believed that I would be treated

differently and that I would experience retaliatory actions that would continue to prevent me from carrying out my research and meeting grant commitments. Because I had indicated my desire to go to another center at a different school within Harvard and continue my project, I feared I would be pushed out and isolated at Shorenstein and the wider Kennedy School or that my move to another center at Harvard would be sabotaged. I conveyed all of this to Ms. Goodman and she said there was not much that could be done, but it seemed "out of order with typical processes for winding down projects" as **HR was not notified beforehand**. Particularly, I feared that the Dean's continual creation of new restrictions for me was creating internal confusion, which would just further delay any administrative action at all on my requests for hiring, planning, or doing public engagement.

120. Ms. Goodman encouraged me to document the meeting with my supervisor, I sent this to Ms. Manley:

Hello Laura,

At the beginning of the meeting, Doug told me about the faculty job opening and encouraged me to apply, but stipulated there are no guarantees. He informed me that he wanted me to wind down TASC and prepare to leave HKS. He said I could not fundraise anymore, but he would honor any outstanding grant commitments. He would not allow any new gifts to be processed. I informed him that I was expecting 30k from [redacted as "**Donor A**"], \$150k from [redacted as "**Donor C**"], and \$100k from [redacted as "**Donor I**"]'s covid project to be processed soon. I disagreed with the position that I cannot fundraise as it makes it difficult to do my job as research director.

I was worried that I did not have enough funding raised or employees at Shorenstein to continue meeting the goals of the TASC project. Moreover, I had just gone on a fundraising trip with Nancy and Laura. I asked him if it would be okay if I put new funding elsewhere at Harvard as I spent down funding at HKS, (naming both Berkman or IQSS as possible options).

It was my understanding from the discussion that he would be fine with me placing new funding at another center so that I would not miss a year of fundraising. I would only transition out of HKS, if the faculty position did not work out. We did not talk explicitly about moving any funding, only that I would want to continue my research at Shorenstein and place new funding elsewhere so that we could create a smooth exit.

I also asked for clarity on the timeline for leaving Shorenstein and he said he would honor the commitments of the contracts and talk with [ASSOCIATE DEAN'S NAME

REDACTED]. For example, our recent grant from [redacted as “Donor H”] goes until Aug 2024. I don’t know what that might mean for the TASC team or my position as Research Director at Shorenstein.

Going forward I need clarification on several issues with the goal of creating a mutually beneficial and quiet transition plan.

First, what is the policy on moving or spending gift funds to other places at Harvard University?

Second, the \$3 million cap falls under which university rule?

Third, what is the rule for staff holding two positions at different places within Harvard at the same time?

Fourth, what can I do to ensure the continuity of my research while this transition plan is enacted?

Fifth, am I allowed to raise new funding at HKS for the next year and, if so, how much?

When I first came to Shorenstein, I had to work every day to rebuild the reputation of the center in the wake of losing several programs in 2019. I put all of myself into the center and I am proud of what it looks like today. I worked closely with Nancy and Setti to win the trust of the board and foundations, and we did it by creating a sustainable research agenda that attracted top talent back to Shorenstein. That kind of field-building is a testament to having a strong culture of academic excellence and rigor. During the pandemic, it was immensely rewarding to share our vision of Media and Internet Studies with the world, while teaching a new wave of outstanding students how to analyze media manipulation and disinformation. I consider HKS and Shorenstein my academic home and would not want to do anything to disrupt that.

I also want to express my apologies for how things went down recently with the Misinformation Review. While I helped [NAME REDACTED] get the project off the ground and did some initial fundraising for him, I was not part of the editorial team that published the ADOS paper and haven't worked at the project since the beginning of the pandemic. I did work hard to help find a solution afterwards, but I am sorry for what happened overall. I am invested in Shorenstein's success and overcoming the institutional challenges associated with this emerging field of research.

Throughout this transitional period, I will continue to conduct this research with transparency, integrity, and accountability. That includes ensuring senior leadership at HKS is routinely engaged in the agenda of TASC. I would appreciate the same operational visibility from the administration. To that end, I would appreciate help in fashioning a transitional plan that does not disrupt the on-going work of the TASC project, while also meeting the goals of senior leadership. If possible, I would like this to be a win-win situation, but I do not have enough information to know what the desired outcome from HKS is.

My goal is the same as Harvard's mission. I want to do the work of research and education at a place where my team adds value to the institution. That means bringing in resources to facilitate cross-disciplinary collaborations, mentoring colleagues and students to use their education for public service and social good, while also sharing our knowledge publicly so that stakeholders can make decisions in the public interest.

Of course, I hope that all of this becomes moot if I can clinch the faculty position, but like the Sox in 2004, it's a long shot.

Best,
Joan

121. On September 15, 2022, I had a follow-up meeting with Dean Elmendorf, with both Ms. Manley and Ms. Gibbs present. During this meeting Dean Elmendorf reiterated that I was prohibited from hiring any new employees, unless they were to replace those who left, and that I and TASC are prohibited from starting any new projects. I was also told I could not fundraise for my research.
122. Dean Elmendorf sent this follow-up email on 9/19/2022:

Subject: Follow-up to our meeting last week

Dear Joan,

Thank you for meeting with me and Nancy and Laura last week. I know you were disappointed by the directions I spelled out, and I am sorry about that.

As I mentioned at the meeting, I want to summarize what we discussed:

- As I said in our previous meeting, I think you're doing interesting and important work—but the Kennedy School requires all projects to be led by a faculty member. When TaSC was small, having this project led by a staff member was a small inconsistency with our rules, and we approved it as an experiment; now that TaSC is big,

having the project led by a staff member is a big inconsistency with our rules and our structures for academic work.

- Therefore, as I said before, I cannot allow this arrangement to continue indefinitely. I also cannot allow the project to get any bigger than it is now, again because it is not faculty-led.
- We will launch a search for a faculty member focused on information and democracy, but unfortunately we can't do that right away as I had hoped because high inflation and the performance of financial markets have made us defer a set of faculty searches and other important investments that we had been planning. We'll be happy to have you apply in that search, but as mentioned previously, there are no guarantees about the outcome. Given the uncertainty of our timing and the uncertainty of the outcome once we launch, you should make other plans before your project needs to end here in its current form.
- I can let the project continue at the Kennedy School until June 2024 if you want, but by then it needs to have been fully wound down here. In the meantime, you can't expand it here, specifically:
 - You can't raise more money. You have sufficient balances to cover your current run rate on spending until June 2024.
 - You can't hire more people; this means no increase in the number of staff plus fellows, or in the number of LHTs.
 - You can keep doing the things you're doing, but you should not be starting substantial new work.
 - You can't shift part of your operation to another school at Harvard because you're on our staff and our responsibility. If some other Harvard school wants to hire you, we would of course help to facilitate that transition. I suggest that in any discussions you have with other schools at Harvard, you should be sure they understand that hiring you means taking you and your whole team and taking full responsibility, and you should be sure that you and they agree on the specifics of the role you'll play and the prerogatives you'll have. That will allow us to help with a smoother transition.
 - If you were to move outside of Harvard, we would also work with you to ensure as smooth a transition as possible.
- In addition, Sarah Wald will need to work with you and OGC to clarify the intellectual property rights to your work, because under Harvard's policies the work product of staff members is Harvard's IP.

I recognize that there will be questions and issues that arise, and I urge you to keep in close contact with Laura and Nancy so that we are all on the same page. Again, I understand and am sorry that these restrictions are disappointing to you.

Best wishes,
Doug

123. I responded on 9/26/2022:

Dear Doug,

Thank you Doug for the directions here. It has been both disappointing and confusing. When I first came to the Kennedy school, I was on my back foot after having been recruited by [REDACTED], but I stayed because Nancy and Setti were able to provide me with a promotion to research director. It has been difficult to raise the center back to its world-class status as a place for policy and journalism research, but we did it in short order. Now the center is more vibrant than ever. While I imagined I'd grow into my gray at Shorenstein, I realize that's not the plan now and will keep you informed as I consider pathways.

If you could help me by letting me know who you are talking to about my future course, it will help me field different concerns.

Best,

Joan

124. Dean Elmendorf sent a very vague reply on 9/27/2022:

Dear Joan,

Thanks for your message. I've talked with some key supporters of the Shorenstein Center about the Kennedy School's requirement that all projects be led by faculty members and about the implication that I can't let your project run indefinitely or become bigger under staff leadership. I've also discussed the structure and finances of TaSC with a few people at HKS and elsewhere at Harvard, in order to facilitate any coming transition. But I've been clear in all of these conversations that I can't speak for you or your plans, and I'm sure that none of these people would be surprised if you reached out to them yourself.

Best,
Doug

125. Since these meetings, my team has lost nine full-time employees. I was only allowed to bring on one new fellow. It was a struggle to get that contract approved, even though I started that request before this series of meetings. Since then, we have not had any of our requests approved from Shorenstein leadership and routine actions are much harder to accomplish, like getting budgets drawn up or grant work passed through the office of sponsored research. This has led

to frustration among my program manager and coordinator, who have told me they fear for their jobs because they have continuously been ineffective at resolving pending issues.

126. Across the TASC team, the unstable working conditions caused sadness and low morale as they watched our numbers dwindle and feared their contracts would not be renewed in 2023. While I know the goal of HKS and Shorestein's leadership was explicitly to reduce the prominence of my and my team's research, I was not able to carry out the projects we had designed when the administration was increasingly isolating the team and leaving us to languish. We were intentionally being understaffed throughout 2022.

127. At this meeting, I was scared and confused as the conditions I agreed to work under had shifted dramatically. By my own calculations I had over \$4.5 million in research funding held at Harvard, which was set to languish if I could not continue our research programs. After this meeting, I also feared retaliation from senior administrators who may pass me over for opportunities to network within the university. Moreover, I feared that my name would be poisoned within the leadership of Harvard as I would be branded a difficult woman. What's worse though is that not only am I being harmed professionally by these new restrictions, it is impacting extremely talented junior scholars on the TASC project.

128. Dean Elmendorf also told me that the Kennedy School will now exercise its ownership of my book, "Meme Wars". Even though some staff at Harvard had published books without Harvard seeking to own the copyright, he stated there was a policy that all staff's research was owned by the University. I asked if this policy applied to writing that was not part of the grants or gifts agreements and was conducted entirely off campus and without university support. I also had a separate contract for the book publication. He reiterated that the school owned "all staff research."

129. The word "staff" was the important distinction here, as "faculty" own their IP rights, but staff do not. But I actually had two job titles at Harvard, one is a staff designation, the other is as a faculty member. I taught a course on media manipulation and disinformation campaigns, so my research directly informed my course offering. Below is a screen capture from my

employment profile taken on 8/27/2023:

The screenshot displays the Harvard GMAS profile for Joan Donovan. The header includes the Harvard GMAS logo, a search bar, and navigation links for People, Organizations, Links, and the user's name, Joan Donovan. Below the header, there are breadcrumb trails for 'Segment Search', '01-Misinformation Training Program fo...', 'Financial report due Jan 15, 2023', and 'Documents'. The profile name 'Joan Donovan' is prominently displayed at the top left, with 'Related links' and 'Info' options to the right. A sidebar on the left contains various navigation options: To-dos, Portfolio, Notification preferences, Clipboard, Edashboard, Research teams, Active and pending projects, and Other support and activities. The main content area is divided into two sections: 'Person information' and 'Job information'. The 'Person information' section includes fields for Salutation, Name (Joan M Donovan), Suffix, University ID (41402989), Active in PeopleSoft (Yes), Merged (No), and GMAS user (Yes). The 'Job information' section is a table listing current and past positions.

Person information	
Salutation	
Name	Joan M Donovan
Suffix	
University ID	41402989
Active in PeopleSoft	Yes
Merged	No
GMAS user	Yes

Job information			
Organization	Title	End date	Contact type
HKS*Shorenstein Ctr Staff	Research Director for the Shorenstein Center/ Director, Technology and Social Change Research Project	Dec 31, 2024	Humanities/Social Sciences Dir
	HLS	Aug 31, 2024	
HKS*Faculty Members	Adjunct Lecturer in Public Policy	Sep 1, 2023	Lecturer, Adjunct

130. As noted above, when I inquired specifically about the [Donor E] funding, Dean Elmendorf said that he would "not entertain the notion" of returning any of the unspent [Donor E] funds or engaging the provost on the matter. Given this, Dean Elmendorf further reiterated that I was barred from engaging in any further fundraising. As the [Donor E] gift terms stated that he was required to have consultation with [Donor E] if he wanted to use the funds for purposes other than TASC – unless it was not possible to have such consultation. I asked [Donor E's principal] if he had been consulted and he said, "no."

131. Dean Elmendorf also delivered the news that there would be no tenure track position opening for information and democracy, which he told me about in the August 24, 2022 meeting. While I was always skeptical that this job actually existed, Ms. Gibbs appeared horrified to learn that it was not going forward. She questioned what had happened, and Dean Elmendorf replied that increasing inflation was to blame. I always believed that the job was conjured as a way to quell any internal advocacy by Ms. Gibbs or Dr. Sweeney to retain my team. In fact, Dr. Sweeney and I had discussed the position at length because Dean Elmendorf had told her about it during a private meeting in August. However, when Dean Elmendorf announced a different position at a faculty meeting in early September, I noted to Dr. Sweeney that I had doubts it was going forward.

132. Following the August 24th meeting with Dean Elmendorf, I spent time trying to find a new place within Harvard University where TASC can continue at either the Berkman Klein Center or the Institute for Quantitative Social Science. For context, back in July 2022, I met with the Berkman Klein Center's relatively new director, Sue Hendrickson, and we discussed the challenges I had with the Kennedy School. During that meeting, she told me that she would support having TASC move to the Berkman Klein Center. During a meeting with Jonathan Zittrain in October 2022, I subsequently learned that Dean Elmendorf reached out to Jonathan Zittrain, the Faculty Director of BKC and Dean John Manning, the Dean of the Harvard Law School, and this stalled the progression of TASC moving to BKC. Mr. Zittrain said that Dean Elmendorf said I "bragged" to him that I was "leaving for BKC." Never did I display such a flippant attitude towards Dean Elmendorf. From this, I realized that Dean Elmendorf was sabotaging my efforts to stay at Harvard and deliberately alienating me from colleagues.
133. Further, I was receiving pushback from Ms. Manley and Ms. Gibbs, individually about moving internally inside Harvard. They each explained that BKC would be another difficult situation, where I would be shut down if I angered donors or powerful professors. They warned that Facebook was even more heavily entrenched in the Law School. At that time, Monika Bickert (Facebook's Head of Policy Enforcement), Sheryl Sandberg, and others from Facebook were Harvard alumni. Several Facebook employees, including Ms. Bickert, collaborated with several initiatives at BKC and the Law school more broadly. In fact, the plan for the "Facebook Oversight Board" was hatched during a vacation taken by Noah Feldman, a Harvard Law School Professor, at Sheryl Sandberg's home.
134. For further context on Facebook's penetration of different schools within the Harvard umbrella, on 2/12/21 *The New Yorker* reported on the initial meetings between the Harvard professor and Facebook,

In 2018, Feldman was staying with his college friend Sheryl Sandberg, the chief operating officer of Facebook, at her home in Menlo Park, California. One day, Feldman was riding a bike in the neighboring hills when, he said, "it suddenly hit me: Facebook needs a Supreme Court." He raced home and wrote up the idea, arguing that social-media companies should create "quasi-legal systems" to weigh difficult questions around freedom of speech. "They could cite judicial opinions from different countries," he wrote. "It's easy to imagine that if they do their job right, real courts would eventually cite Facebook and Google opinions in return." Such a corporate tribunal had no modern equivalent, but Feldman noted that people need not worry: "It's worth recalling that

national legal systems themselves evolved from more private courts administered by notables or religious authorities." He gave the memo to Sandberg, who showed it to Zuckerberg. For a few years, Zuckerberg had been thinking about establishing a "legislative model" of content moderation in which users might elect representatives to Facebook, like members of Congress. A court seemed like a better first step.

In November, 2018, Feldman gave a short presentation to Facebook's corporate board, at Zuckerberg's invitation. "I didn't feel like I was convincing my audience," he told me. Feldman recalled that some members felt such a body wouldn't sufficiently improve the company's legitimacy; others worried that it could make decisions that would contradict Facebook's business interests. A few minutes in, Zuckerberg defended the proposal. He noted that a huge proportion of his time was devoted to deliberating on whether individual, high-profile posts should be taken down; wouldn't experts be better at making those decisions? The idea remained controversial, but Facebook's corporate structure allows Zuckerberg to make unilateral decisions. Soon after, he ordered the project to begin. "I was kind of stunned," Feldman told me. "Like, holy shit, this is actually going to happen."

135. Later, in February 2019, Mark Zuckerberg engaged in a rare interview with Jonathan Zittrain, BKC's faculty director, about issues related to content moderation and the future of Facebook. At this point, Facebook's public relations strategy was relying on the prestige of Harvard to bring legitimacy to their corporation. This intellectual support from Harvard had the effect of pivoting mainstream media and congress' attention to the formation of the oversight board and away from the manifold flaws in Facebook's product design and moderation process.
136. Despite her encouragement for me to leave Harvard altogether, on December 1, 2022, Dr. Sweeney set me up with a meeting with Gary King, Director of the Institute for Quantitative Qualitative Social Science (IQSS) located in the Faculty of Arts and Sciences, in the hopes that I could move my TASC project into her Data Privacy Lab located at IQSS. Dr. King took the meeting with me, but was reluctant to open up a pathway to collaboration. As the meeting ended, he gave me this advice, "When you become persona non grata of a Dean at Harvard, it's best to leave quietly. You can raise money somewhere else." This was a surprising statement since earlier in the conversation, Dr. King said he did not know anything about my situation at HKS. I was relieved to hear that and saw it as an opportunity not to dredge up anything negative. I told him about my plans to work on the FB Archive and continue my media manipulation research. He said that Latanya Sweeney was "spread too thin across the university" and that "it would be hard to convince the Dean of FAS that she was providing oversight." He

suggested that I approach a professor in the government department who did not have research funding and offer to partner with them. I was baffled by this advice and did not follow up any more about moving to IQSS. I informed Dr. Sweeney of what happened with Dr. King and told her I planned to move forward with BKC.

137. On December 8, 2022, I texted Dr. Sweeney:

He didn't seem interested. He said I must have said something that embarrassed the dean which is why Doug isn't trying to retain me. Then he suggested that I approach a Gov dept professor that doesn't have funding and see if they will PI my work through iqss. I asked him if he was interested in being PI and he said he's too busy to commit to anything. He also recommended that I leave Harvard and just raise new money because that's the only way to protect me and my team. I left really disappointed. He didn't seem like he would get in the way of anything but he also seemed wary to help me. I asked him about working with you at iqss and he said that he is unsure of what you are doing at iqss now that you're at Shoreline.

138. Throughout the fall of 2022 I had numerous meetings with staff and faculty associated with BKC. In one meeting in October 2022 with Mr. Zittrain, we devised a plan to have a BKC affiliated faculty member and tenured anthropology professor, [Name Redacted], serve as PI on TASC, and move the management of the team and resources into BKC. I worked diligently throughout the fall to make this work, including six meetings with the collaborating Professor. The idea to move to BKC was stopped following a Crimson article on February 2, 2023 with the headline, "Harvard Misinformation Expert Joan Donovan Forced to Leave by Kennedy School Dean, Sources Say."¹³ Ms. Hendrickson, the Executive Director of the Berkman Klein Center for Internet and Society, told me on a Zoom call that given how relatively new she was that she did not have the "political capital" to bring on someone that Dean Elmendorf had "targeted."

139. Even though I was barred from fundraising for my own work, Larry Bacow, then President of Harvard, invited me to be a panelist for Harvard's Global Advisory Council held at the Kennedy School in October 2022. The invite was issued on August 14, 2022, just ten days before Dean Elmendorf shut down my project. I immediately accepted President Bacow's invitation with excitement. I took the invitation to be a great indication that Harvard University valued TASC's research and wanted to highlight it. I had feared being blackballed from university events after the fallout from angering Elliot Schrage. When I met with Dean Elmendorf on August 24,

¹³ <https://www.thecrimson.com/article/2023/2/2/donovan-forced-leave-hks/>

2022, he forbade me from fundraising, but did not mention this event set to happen in October 2022. I fully expected the President's office to cancel my participation, but it went forward.

140. At this prestigious dinner, I was among 100 very influential people. [REDACTED] a Professor of Government at the Faculty of Arts and Sciences, and I were interviewed by the multi-billionaire donor, [REDACTED]. All of the upper-level deans and administrators from across Harvard were in attendance. I felt it was hypocritical for me to be on the panel knowing that any funding raised would not go to support my work. However, I was also wary of retribution and did not want to give Dean Elmendorf any further basis to harm my team, my work or my career knowing how closely he was monitoring me and my team. At this event, I did not tell anyone what was happening to me and the TASC team.

141. None of this is conducive to a sustainable working environment for producing rigorous academic research. Moreover, the scrutiny over my project by the Dean has caused gridlock among decision-makers within the school who did not know how to enforce restrictions targeted only at me. Ms. Gibbs and Ms. Manley both had remarked on several occasions that they did not know what I could or could not do because the restrictions were so vague – and ever evolving. Overall, Dean Elmendorf's intent was to reduce the public profile of me and my team, which he stated several times during our meetings. He succeeded in this as I did not publish any white papers, new academic research papers, or do much press after January 2023, as I did not want my team to suffer in retaliation for my "public profile".

142. In late 2022, Ms. Manley began a campaign to make me so miserable I would be forced to resign. On November 28-30, 2022, I was a panelist for a Knight Foundation event in Miami. Ms. Manley also attended the conference. I used this as my opportunity to update funders in person that I was asked to leave HKS. Most expressed their shock and dismay at the decisions of HKS, as some of these same funders provided support to other failed projects at Shorenstein. Approximately 10 funders from 6 foundations attended a dinner I hosted with Dr. Sweeney, where Dr. Sweeney and I were discussing the FB Archive. Even though I could not raise money I did believe that the project was going forward as a partnership between the TASC team and Dr. Sweeney's lab and within the framework of our original vision, where any money raised for the project would be part of budgetary discussions.

143. I heard from one funder at the event that Ms. Manley was soliciting funding for Shorenstein and discussing the FB Archive project too, but she was surprised when a funder mentioned that he knew HKS leadership had asked me to leave. The funder told me that Ms. Manley tried to

explain that there was a policy being enforced that said only tenured faculty can run projects, but that didn't make sense to him as he had funded other projects at Harvard which were not supervised by a tenured faculty member. He said the reasoning on behalf of HKS was "weak" given the powers of Deans to "make things happen." He said he was "surprised it took HKS this long to kill the project, given what happened to the Information Disorder Lab," which was a similar disinformation/media manipulation research project at the Shorenstein Center, that was shuttered in 2019 following a disagreement with the Dean about policy enforcement related to conflicts of interest. When that project shuttered in October 2019, I understood that it had a multi-million dollar budget, of which only a portion of the remaining funds were returned to donors and the remainder kept by the University.

144. Also at the Knight conference, a colleague warned me that Ms. Manley was asking other researchers about me. She asked him, "Do people in the field even like Joan?" He was caught off guard and told her "Yes, she has done great work and mentored so many different researchers." He noted to me that it was obvious that Ms. Manley was trying to dig up dirt about me and he left the group conversation.

145. Efforts to drive me out of HKS continued to escalate. On December 12, 2022, Ms. Manley requested a face to face meeting in her office with one of my employees, who had worked for me for two years conducting research on conspiracy theories within communities of color. In the meeting, Ms. Manley reportedly told my employee that "Joan is selfish," and "a liar." Ms. Manley went on to sow discord between my employee and myself by saying "Joan will leave without notice," and that "you will lose your job." Then, Ms. Manley attempted to solicit a complaint about me.

146. My employee came directly to my office after her encounter with Ms. Manley to tell me she would call me that evening – after she's had a chance to discuss the encounter with her therapist. She phoned later that evening to tell me the specifics of her meeting. She feared going to HR because of retaliation. She needed a contract extension and thought that Ms. Manley would hold it up if a complaint surfaced about their conversation.

147. I assured her that I would keep her name confidential and should she make a report, I'd think it would do more to protect her than cause harm. Eventually, we both made reports to HR. Because HKS was intentionally understaffing TASC in order to accelerate the "wind down process" I reported this to HR, claiming Ms. Manley's actions were blatant retaliation and another move towards constructive discharge. My employee's report described the meeting and

Ms. Manley's creation of a toxic work environment by pitting her against me, her supervisor. After an investigation, HR called the incident "unprofessional conduct." There was no attempt at mediation. My employee and I began working from home permanently in December 2022.

148. When I spoke to HR on December 13th about all of this, they encouraged me to make a written complaint. Here is the text of that complaint filed on December 24, 2022:

Subject: Confidential Complaint

Dear HKS HR,

On Monday December 12, 2022, my manager, Laura Manley, called for a meeting with one of my employees and divulged confidential information about my work contract, called me a "liar" and suggested that my employee was in a precarious position because they worked for me. Laura concluded the meeting by encouraging my employee to come right to her or HR if problems developed with me. This toxic situation has marginalized me as an employee and created a hostile working environment for the TASC team. Because I work on issues of immense public importance, I must have safe and secure working conditions. Periodically, I receive death threats for the work I do. I no longer trust my manager to ensure my safety. Moreover, by attacking my character and involving one of my employees in a dispute I have with HKS and Shorenstein leadership, Laura has created an untenable situation, which needs HR's attention. My employee has asked not to be named for the time being in this complaint because they are afraid of further retaliation from Laura. They told me they intended to document this with HR.

Details: On December 12, 2022, I was contacted by my employee in the morning who told me that Laura Manley wanted to meet with her. Later that evening my employee called me to say they were "shocked" at what Laura told her. My employee said from the moment they sat down, Laura was sharing confidential information about me. My employee recounted statements from Laura including, 'I want to tell you my side of the story of what is happening with the TASC team.'

I do not tell employees the details of my issues with HKS because it is not their business and can make them feel unwelcome or precarious. This employee does not manage anyone or have any reason to meet with Laura outside of professional development. Previously, I informed this employee and the entire team that I do plan on leaving Shorenstein if I can find an appropriate center for myself and the team. Following the meeting with Laura, my employee reported to me that they felt they were 'being put in the middle of a disagreement that they didn't understand.' They believed Laura was trying to "dig up dirt" on me. My employee reported feeling "fearful" that Laura may do

something to prevent their contract renewal as a way of punishing me. My employee left with the impression that Laura has a grudge against me.

During their meeting, Laura went on: 'Joan is lying about what is happening to her and her status at HKS.' 'Joan is talking to other universities and is only looking to take care of herself. She plans on leaving the team behind.' Laura had no reason to tell my employee any information about my current employment situation and is not privy to the details of negotiations I may have with other universities. I have kept Nancy and Laura informed of discussions I've had with other centers at Harvard and as my supervisors they remain fully informed of the outcomes of these meetings. I have been transparent with my supervisors and have answered every question honestly. However, Laura has made it clear that she doesn't want me to move to the Berkman Klein Center, which she views as a direct competitor to Shorenstein for fundraising.

Laura also reportedly told my employee: 'Joan's job was always temporary and that it could not go on indefinitely. Joan has known this since she started and is lying about it.' The first time I had heard this rationale for my termination was in a meeting in Nov 2022 with Nancy and Laura. When Nancy Gibbs took over as faculty director, I was given a promotion to Research Director and the center started to pay 3% of my salary. I was encouraged by Shorenstein leadership, particularly the board, to continue research on technology's impact on democracy and journalism and to have a significant public presence in the media. Our shared goal was to make Shorenstein a world-class research center for journalism and public policy. I believed that I was core staff and would continue to stay in the position if my work was exceptional and followed standard academic conventions. Laura went on, "Joan is telling donors lies about why she is being let go." My employee does not interact with donors. I should be informed, if Laura or anyone at the school is talking to donors about my employment. There is no reason to tell my employee this. I have made no public statements about my termination. I have requested that Nancy, Laura, and the Dean tell me if they are discussing my employment with funders and have heard nothing from them since September on this matter.

My employee said that Laura continuously referred to my actions as "lying" and me as a "liar" throughout the meeting. This is an attack on my integrity and requires HR intervention. Lastly, Laura concluded the meeting by asking my employee if they have any issues with me and when the employee replied "no," Laura asked that if anything comes up that they go to Laura or HR about it immediately. I have always told my employees to go straight to HR if they have issues with me. Moreover, Laura's attempt to drum up problems (where there are none) singles me out and is a retaliatory action because I expressed that I must leave HKS because of the recent restrictions targeted only at me. Not only does Laura's harassment impact me, but my employee also now

feels targeted and may want to change the frequency of their attendance in the office to minimize interactions with Laura.

While I do not know Laura's motivations to meet with my employee, based on their discussion, Laura had no other agenda items and used the time to berate me and sow dissension. I'm at a loss here because I just want to do my research in a safe and supportive environment.

As a manager, I must assert Laura's direct targeting of my employee is unethical and caused trauma. This must stop. Based on these circumstances, I have no faith that Laura will protect my rights as an employee and ensure my safety and that of my team. I fear further retaliation for making this complaint to HR, so please treat with care. I currently do not have legal representation, but reserve the right to involve an attorney if the situation worsens.

Sincerely,
Joan Donovan

149. In light of the events that followed, I believe Ms. Manley wanted me to leave Harvard University entirely - long before I realized she did. The heightened scrutiny over my project by the Dean caused gridlock among decision-makers within the school who did not know how to enforce restrictions targeted only at me. It was very frustrating for many people across the school. Overall, Dean Elmendorf's intent was to reduce the public profile of me and my team, which he stated several times during different meetings and email. He was successful in that I felt completely alone and was now being targeted by my direct supervisor.
150. Ms. Manley took up a campaign within HKS to sow rumors and create a toxic work environment with the obvious goal of pressuring me to leave Harvard. On December 18, 2022, I received this email from Ms. Gibbs about an upcoming conference TASC was planning to meet the requirements of a grant with [redacted as "**Donor B**"], Ms. Gibbs wrote,

Subject: Heads up

Joan, Heads up on two important things—after a rather tense annual report meeting with the Dean and all of central command:

First, on Digi, it appears that the Dean agrees that Belfer should continue to control to funds with the existing people they've enlisted work on it. ([REDACTED] has been adamant about this in emails to me.)

And second: I know your team has been at work on the PI Tech convening. Given Doug's concerns, I worry the school might push back, as I know THEY know about it from the room bookings. Not sure what's going to happen but didn't want you to be blindsided.

Talk soon, NG

151. Minutes later, I received a text from Ms. Manley that read, "did you see the email from Nancy? It's not looking good..." I did not respond.
152. I took mental note of the all capital "THEY" in Ms. Gibbs' response. I thought, wouldn't the Dean know about the conference from Ms. Manley and Ms. Gibbs? Or was I being so tightly surveilled that a room booking by my junior staff was flagged by Dean Elmendorf's team? Nevertheless, I responded that evening with this email:

Nancy,

Thank you for the – frankly scary- update. As for DIGI, thank you for raising the concerns with Belfer about the project. When I designed the project and raised the funding from [Donor E] it was [Donor E's Principal]'s understanding that I would be driving the research and public engagement.

Since then, I have been marginalized and blocked from carrying out the research design and deliverables. Now that some of the Belfer research assistants from this have reached out to me for guidance-- because of the lack of intellectual leadership--I am concerned we will not meet the goals of the project to educate the public on technology's impact on democracy.

As for your second update, I want to lift up that [Donor B] gave us money for PII (including for a conference and other workshops) as well as core support to do this work. This is not a new project but something that has been going on for the last 18 months, and everyone was looped in. That said, we anticipate that there will be ongoing hurdles and will adjust accordingly. I don't need to remind you that we are at an incredibly important historical juncture where journalism must meet the challenges facing our democracy. The new restrictions placed on TASC have been detrimental to my team's ability to do our jobs and shine a light on the dangers that tech poses to the future of both journalism and democracy.

Some examples of those restrictions:

After two months of planning by two full-time employees, our podcast (a core product I had discussed with [Donor E] was blocked by Dean Elmendorf. One of those researchers left because of this.

After a discussion with you and Laura last month, an "audio documentary" seems to be back on the table possibly? I'm anticipating a "no" from the Dean, even though we amended the contract specifically to take out the language of "podcast." We put in a request to hire an events person back in June to help plan the Public Interest internet (PII) conference after discussions with [Donor B]. It has yet to be approved. We already pushed the conference back because we weren't allowed to hire and we still haven't been given a clear answer as to why not.

In August, a researcher was reassigned to plan the PII conference for the Spring. A considerable amount of work has already taken place as most on the TASC team are also involved in the event. We are asking Latanya Sweeney to keynote. Freezing the conference up would lead to another significant effort by our team resulting in no product, like the podcast.

We have open requests for 3 fellows for Spring 2023 ([3 NAMES AND NETWORKS REDACTED]). No word on this yet either.

Pending grants: 150K from [Donor C] and 30K [Donor A] are still under review. Since August I have only been allowed to bring on 1 full-time fellow (and that was difficult). I've lost SEVEN full-time people. I also moved two full-time fellows to part-time. That's a loss of 9 FTEs. We are a shell of our former team.

Despite being told that I would have until 2024, my sense is that I am being pressured to leave by having so many requests denied or left to languish? Dean Elmendorf expressed that I was "too prominent," but these restrictions most adversely impact the people on my team and their research. I am doing the best I can to manage the team and maintain a sense of normalcy under these new and unprecedented restrictions. However, it is burning out staff and researchers to have such unpredictable working conditions and added scrutiny on our research agenda.

This is especially disappointing given the enormous responsibility TASC has to represent this research to millions of people globally and the newsrooms, technologists, and politicians who look to us for guidance. I'm really at a loss for how to continue under such circumstances. I appreciate anything you can do to ensure the continuity of our work in the coming year.

Happy Holidays,
Joan

153. Ms. Gibbs replied on 12/20/23:

I understand why this is scary, and so I'm glad the Dean wants to meet in person so we aren't always playing telephone. It seems to me when I look at his guidelines that nothing limits you and your team continuing your research, adding cases to the casebook, etc.—in other words, the core work of researchers at research centers. Where they have drawn lines is on expansion (ie staff) and public facing/high profile activities, which is why you've run into hurdles all along on the podcast and now a large convening. Smaller private sessions would probably be Ok, but anything big and public that requires [2 NETWORKS REDACTED] is likely not. Am here....

154. Then, later on December 20, 2022, Dean Elmendorf sent this email that dashed any hope of completing this grant deliverable:

Subject: Getting together -- and your upcoming conference

Hello Joan,

A few months have passed since we last talked, and I'd like to arrange a time in early January to catch up on your plans for the TASC project. My assistant, [NAME REDACTED], will follow up with you shortly.

In addition, I understand that you are planning a large convening at HKS in the spring. However, a large convening seems inconsistent with the guidelines I established in September regarding new or expanded activities. So, please do not finalize any plans for a conference or invite any speakers or attendees until we talk. I hope you have a good winter break.

Best,
Doug

155. With regard to having a "good winter break," I spent that period waiting in fear and anxiety for whatever worse things would be coming at me from HKS. My physicians prescribed anti-anxiety medication and worked to address my now-chronic insomnia. Of course the convening the Dean referred to was not a "new" project as it was a requirement of the [Donor B] grant agreement and we had been working on it together for months at that point. Both Ms. Manley and Ms. Gibbs were not only well apprised of the progress all along, they each participated in the planning of the convening. I had to tell the TASC team that the conference was likely not going to happen due to Dean Elmendorf's restrictions. Not only had he killed the podcast that was two full-time employees' work product for several months, but now most of the team was affected as each employee was set to moderate a panel and/or present research.

This was my personal breaking point. It was crystal clear that I was not going to be able to fulfill any of my grant deliverables nor perform meaningful research at HKS. Dean Elmendorf was ensuring that there would be no academic freedom for me or my team. It was humiliating to be in this position and have members of Congress, international human rights organizations, and dozens of journalists hold me in such high regard, when I could not even protect my research team from HKS' suppression of their research, which now directly impacted their ability to gain notoriety and associate with others in the field. I desperately wanted to quit for my own mental well-being, but I knew I could not do it before helping my employees.

156. My primary concern was to secure positions for my staff whose contract renewals were constantly being delayed and whose terms became shorter and shorter creating painful anxiety and uncertainty. I began widening my search for new jobs, but I was stymied by my unwillingness to further endanger my team by talking about what was happening to me at HKS and the shocking conflict of interest of Dean Elmendorf in his unwavering commitment to protecting Facebook's interests. Moreover academia is a tough place to be successful and tenure-track jobs are scarce – especially after the *Crimson* article made clear I was being pushed out.
157. There were different rumors circulating about my employment around Harvard and across numerous universities and newsrooms. HKS had issued several statements to the media about the shutdown of TASC. I was given an email that Ms. Gibbs had written to the board of Shorenstein, by a reporter at *The Washington Post*, who asked me to comment. I declined but inquired as to where he got the email with information about me, the TASC team and our funding, and he said that HKS comms sent it to him.
158. At this point, I realized Ms. Manley was trying to sabotage my work. I did not know what her motives were – whether to earn favor with the Dean's team or to distance herself from me as "persona non grata" – as was made clear to me by Dr. King at IQSS. Ms. Manley told me at a conference in November 2022 that she felt outside the "circle of trust" with the Dean's office and she was being treated in ways that she felt were sexist and racist. We had commiserated together about feeling isolated, which was why it was such a painful betrayal for her to contact my employee to solicit a complaint just a week later.
159. On January 3, 2023, I wrote an email to HR following up on my complaint:

Hi Pam and Jen,

Laura reached out via text to have a meeting with me about the Thursday meeting with the Dean. I'm very anxious about how this will play out. I do not know what to say to her.

I have a meeting scheduled with Nancy, Laura and Dean Elmendorf and Sarah Wald on Jan 5th because the Dean believes I am in violation of the rules he set for me at our last meeting in September. At that Sept meeting, the Dean stipulated that I cannot start any new projects and to keep in touch with Laura and Nancy about my plans. Throughout the fall, my team was planning for a Spring conference that I informed Nancy and Laura about during several meetings. There was no friction from them about it.

However, after the Dean had meeting with Nancy and Laura in early December, the Dean emailed me asking that I stop the conference planning until I meet with him because he believed it violated the special rules he made up in September. One week prior Laura was in communication with my program manager about the conference.

This was the same week Laura called me a liar to my employee. Laura remarked that 'the conference was not listed in the grant budget' and we replied that it was in the grant narrative. We did not know the reason why Laura asked these questions. I feel scared and saddened that it has come to this. It's been devastating to me to see our research and programs frozen and then to be personally attacked by my supervisor.

I do not want to lose my job or endanger the employment of my team. I do not want this to escalate.

I'm not going to come to the office until there is a clear plan for how to address what happening, especially the harassment. I will likely take the meeting with the Dean via zoom, but I am hoping to be able to bring an advocate. Is there a policy for this? I do not feel safe in this environment.

In August, the Dean told me that I was "too prominent" and I don't know what that means for my career or my work at HKS. I do not believe I am being treated fairly or that I am being managed in good faith.

Since I have arrived at HKS, I have held conferences on campus or virtually. The conference in question was part of a grant narrative from 18 months ago and is not the last conference I must deliver before I leave. I would like to know if the confusion by the dean about this conference might also be related to Laura's harassment of me?

The goal of my work has not changed. I do research and education related to technology, journalism, and democracy. I have made an appeal to the Berkman Klein Center to bring

our work over there, but I am afraid that the transition will be held up because I am being subject to unusual and unclear rules.

Sincerely,
Joan Donovan

160. HR responded quickly to ask me why I felt unsafe and to provide me with the number of campus services. I responded to HR:

Hi Pam, I am available for a meeting on Monday morning or earlier.

Thank you for the phone number for campus services. I have a proper mental health counselor and am utilizing them.

When I wrote that I'm saddened and scared it's because I never imagined I would need to make a complaint like this about someone and I'm very afraid that even reporting it will lead me and/or my team to lose our jobs.

As for physical safety, I want to explain further. As a result of my scholarship (having to do with white supremacism, disinformation, and the other awful things), I receive threats weekly. These come in through my email, through physical mail, and over social media. In some instances, people have even come into the office looking for me. In 2019, campus security had to intervene to stop a man from contacting me and seeking information about me by reaching out to colleagues. He had even started to show up in public places where I was giving talks and at the office. We had two panic buttons installed at Shorenstein because of threats to me.

I had an unwanted visitor as recently as December 12th, where a man (claiming to be "from Wall Street" who had attended the capitol riot on January 6th), gained entry into Shorenstein, looking for me. I was able to get him to leave and spoke to Jen about it the next day. December 12 was the same day Laura spoke to my employee. I did not make a report, but I expressed that I did not feel comfortable approaching Laura about issues related to my safety at the center.

When I say I don't feel safe, I mean that I am a consistent target of outside threats and that when my supervisor is choosing to engage in unprofessional behavior, such as name calling and rumor-mongering, the potential for danger is heightened for me.

Here are the specific activities that make me not feel safe:

My supervisor:

1. divulged confidential information,

2. created and spread false information about me,
3. name-called me as a "liar,"
4. and tried to solicit an HR complaint about me.

I do not trust that my privacy and security will be protected in cases where other people are seeking information about me from Laura. Moreover, if Laura did this with one employee, I cannot be sure she has not done this with other people inside and outside the university. Only an HR investigation may figure that out. While absolutely no physical threats have been made by Laura, her active vitriol in this environment of on-going risks worries me a lot. While this might seem outlandish, I rely on my trusted colleagues daily for my physical safety.

Best,
Joan

161. On January 5, 2023, I met with Dean Elmendorf, Ms. Manley, Ms. Gibbs, and Sarah Wald on Zoom video conference. I asked HR if I could have an advocate in the room and was told no, so I opted to take the meeting from my home. Everyone else was in the Dean's office. It was a tense meeting as Dean Elmendorf began to read from yet another pre-written script. He stipulated yet more new restrictions to be applied only to me. First, I was told I could not host any event larger than 30 people. Next he stated that I could not have any prominent guests on campus without his approval. I asked him how he heard about the spring convening and he paused, and asked why would I want to know that? I reiterated that "I wanted to know how you heard about the conference. Was it from Nancy and Laura?" He replied "from Laura and Nancy", seemingly baffled. To which I said, "so it had nothing to do with the room booking?" He looked somewhat puzzled, but his answer confirmed for him that Ms. Gibbs and Ms. Manley were well aware of the months of planning and work put into the event, while also confirming for me that they were taking advantage of their position as interlocutors between the Dean and me to give me false information.
162. He then began to discuss the fate of my team. He directed me to create a "wind down plan" for my project that included how long I was going to stay and what staff should be renewed. Ms. Gibbs and Ms. Manley remained silent and stone-faced. I was crying and had to take long pauses to process the information Dean Elmendorf was reading aloud from his script.
163. He continued on with the script to discuss the topic of "communications." He said, "You can do more of what you want to do, some other place, which I find quite plausible. But

different places have different ways of operating, different leaders make different decisions and so on. I'm comfortable with the ones that I'm making and that **Laura and Nancy** are making here." I wrote this statement down because it signaled to me that Laura and Nancy were also working with the Dean, despite their grumblings to me that they could not believe this was happening and that they did not support his decision. With regard to his concern about communication with donors, I frankly and without hesitation told them who I was in contact with on the board, indicating repeated contact with [Donor G] and [Donor E]. Dean Elmendorf stipulated that my story had to be "accurate, consistent, and coordinated with the Shorenstein Center." I understood that edict to be something akin to a "gag order" by which my external communications required pre-approval from the Shorenstein Center. I clarified for them that given the fact I was not invited to the Shorenstein Board meeting in the fall, I did not know what was said to the board. I said in the spirit of clarity and his requirement of consistent messaging, HKS should write a letter to explain what happened to the TASC project. One of the very few times Ms. Gibbs spoke during the meeting was to say that she believed a letter to the board would be "strange" given that I did not know where I was "taking the project."

164. I responded that I was most concerned about the rumor milling, particularly statements made by Ms. Gibbs and Ms. Manley to [REDACTED] claiming "Joan always knew her job was ending" or that "June 2024 was the end of Joan's contract". In fact, the end date on my employment contract with HKS was actually December 31, 2024. But I did not go into more detail because I did not want to argue with them or bring up that the rumors were coming from their side of the house. These were points Ms. Gibbs made previously to me in a meeting with Ms. Manley and the statements are false.

165. Ms. Gibbs then went on to say that the issue with communication was that "I've written to you about this, that the language is important and I worry that it is easily misunderstood when you say that you've been fired." When I received the referenced email on January 5, 2023, I understood this to be a reference to a comment I made casually to a colleague in front of Ms. Gibbs at a reception for a documentary on December 8, 2022. I was at the event because I was invited to be a panelist for the discussion after the film. The Shorenstein Center saw it as a fundraising opportunity. During the reception in the lobby, I was chatting with colleagues about being let go and "academically fired," the latter is a euphemism for being given your pink slip at a University, which typically means you will be leaving in the next year or so. I explained to my colleague that I was looking for a new job and asked him to connect me if he learned of any

promising opportunity. I was responding to the HKS narrative that the plan was for TASC to "wind down" because it did not reflect the real violence and trauma of the process. Not only was every member of the brilliant and talented team I recruited experiencing soul-crushing rejection and uncertainty, I was losing my whole career, my entire research infrastructure, my professional reputation and millions of dollars in funding located at Harvard, as well as funding I had to leave on the table because I was not even permitted to fulfill my grant deliverables and as they all knew I did not have a place to take it.

166. Dean Elmendorf sent me an email summing up his new restrictions on January 6, 2023:

Joan,

I'm following up on our conversation yesterday by sending notes on my comments so that we all stay on the same page. When we met in September, I explained that you needed to wind down Tasc and other projects of yours by June 2024 at the latest.

My goal in yesterday's meeting was to be more specific about the wind-down process. I began by describing an overall approach and then addressed a few specific issues: On the overall approach: I'd like you to present to me, Nancy, and Laura a plan about to how to accomplish the winding down of Tasc and your other projects no later than June 2024. By a "plan," I mean what activities do you intend to do given the current grants and gifts, what staffing is needed to do those activities, and how you intend to communicate your plans both internally and externally. I would like to receive a draft plan from you in three weeks, which would be January 26.

Once Nancy and Laura and I have reviewed the plan and approved it, then it should be clearer to everyone what should and shouldn't happen going forward.

On your intended spring convening: Given my earlier decision about not raising the profile of your projects, a convening with a large number of guests would not be appropriate. You may host small numbers of guests for panel discussions or seminars, but not large numbers; I think that 30 people is the upper limit on what can happen. Other issues also may raise the question of what is part of "continuing the work" while at the same time not "expanding it"; you need to defer to Nancy and Laura's judgment.

More generally, because Tasc is a project of the Shorenstein Center, any convening should be undertaken in coordination with the Center and drawing on Center staffing (so there is no need for a separate events person for Tasc) and other support.

On invited speakers: High-profile guests at HKS need to go through a vetting process before invitations are finalized. This is a School-wide requirement. Moving forward,

please make sure to work with Nancy and Laura to provide lists of anyone you are thinking about inviting, so the high-profile names can be vetted first.

On staffing: We talked in September about not expanding staff but about replacing staff if needed to wind down your projects, and we are all concerned about transparency and support for the staff working with you. Therefore, part of the "wind-down" plan I mentioned should spell out staffing needs and how those relate to ongoing projects. Most of the current staff terms, as I understand it, end between March and November of this year. We will need to determine whether those get extended, and if so, for how long, so that needs to be part of your suggested plan.

In terms of Fellows specifically, we are reducing the overall numbers of Fellows in all Centers at HKS; therefore, Nancy and Laura will need to look closely at your requests for any new Fellows for your projects, even if they are replacing departing Fellows.

On communications with supporters of the Shorenstein Center and of Harvard more broadly: It's important that members of the Shorenstein advisory board and other donors and grantors hear a consistent and accurate explanation of what's happening with you and your project. I expect that you will coordinate with Nancy and Laura on an ongoing basis to be sure that is happening.

As I said yesterday, I recognize that the constraints needed for the wind-down are problematic from your perspective, and that you may have greater freedom in a position outside the Kennedy School and outside Harvard. If you think it would be better for your work to leave before June of next year, we will do all we can to support that transition. As long as you are here, you and everyone else at HKS need to act collaboratively and professionally with colleagues, with staff members, and with external supporters.

Thank you for your cooperation.

Best,
Doug

167. Immediately after the January 5, 2023 meeting and before I received the email from the Dean, I wrote an email to Ms. Gibbs.

Hi Nancy,

Let's keep much of our communication to email through the remainder of my employment at Shorenstein.

Despite you conveying to the Dean that I use the term "fired" frequently, that happened ONLY ONCE when joking with [REDACTED] about my future at Harvard. I said I was "academic fired" which means I was told ahead that I am being dismissed. Whatever it meant, we laughed about it. It was not vitriolic.

Attending a fundraiser for Shorenstein at GBH was a very raw moment for me knowing I was ousted. I played the role and didn't disappoint. Whatever you and Laura communicated to the Dean about the PII conference was incorrect and surely made it seem like I was up to something that contradicted his rules.

His line about no high profile invited speakers was especially strange, which promoted me to ask questions. He did not find out about the conference from "the room bookings," as you said, he said he based his decision on what you and Laura told him. Whatever was said made it seem like I was doing it to promote myself or cause controversy, which has been a bone of contention with Doug. That was not what was happening here. You both chose to put Doug in the middle of a dispute that you were having with me, but why? It serves no one to mislead him about my work.

I have done everything I can to abide by these rules targeted only at me. Can we just be straight up with each other that this is a painful experience? Halting the work of my team or making them feel precarious helps no one. Targeting me or my employees also causes unneeded grief and a hostile workplace. I have been nothing but truthful in my meetings with you and Laura about wanting to move to a place where I have academic freedom and a Dean sees the value of my scholarship. Moving the whole team is complicated.

I could have left by now but I am a person of integrity. Nevertheless, they are my responsibility and the rules that are forced on me at HKS have negative impact on them.

By the sound of Doug, he be delighted if I left, but I don't think he wants me to stay at Harvard based on his actions. I'm bound by the bank I built and the responsibilities to my team. As a queer woman with the most diverse team at all of HKS, the SIX conferences I have held at HKS all centered on diversity, equity, and inclusion of BIPOC researchers and journalists in this field. You've been at some of them and the energy is electric. My conferences focus on field-building and cross-professionalization. I am usually in the background as these events are designed for my junior staff to shine.

We bring together really eclectic mix of people who often don't want the meeting to end. Now that magic can't happen. I ask you, why be part of that legacy? I will be requesting work from home accommodations in the meantime. I will communicate to my team about the PII conference and news leaders cancellations. I'm not getting fired earlier

than June 2024 over Doug's capricious and arbitrary rule making. I have too many people to support and so much work I want to accomplish.

Through everything, I am certain the truth will find its way,
Joan

168. Later that night, Ms Gibbs replied,

Joan,

Happy to do this by email.

Far from putting the Dean in the middle of a dispute we are having with you, Laura and I have been caught up in the challenge of interpreting and implementing his decision that TASC needs to wind down.

To address your specific points: I've heard you use the term fired multiple times, as has Laura. You sometimes framed it as never having heard of someone being fired for being too successful/too prominent etc. We've had colleagues come to us saying you said you'd been fired and wondering what that meant for working together in the future. Back in September, I raised concern about the use of that word because I worried people could think you must have done something wrong, and could make it harder for you to find the right next role. I heard it as a measure of how hurt and confused and angry you were, but you were using that language enough that I feared it would harm you professionally, apart from not being accurate.

No one has misled anyone about your work; [2 NAMES REDACTED] had multiple meetings with the core team and explained that you were planning a large conference that involved 150 people and an evening event. I was surprised to hear you say this was mainly about meeting student demand for exposure to people in the field, when earlier you said you were fulfilling your grant commitment to "Create an expert network through (virtual and in-person) convenings that combine policy and technology approaches to creating a public interest internet. We will do this by bringing together civil society, academics and policymakers around shared concerns related to internet infrastructure, rights, equity, and justice, to formulate concrete responses, exchange knowledge, ideas and build novel networks of people and technologies in the public's interest." That's rather different from what you described today, of researchers and practitioners speaking to a room full of students.

The context of much of what you heard today was not just the Dean applying his broad guidelines to specific questions of staff, fellows, convenings etc. It was because in recent weeks, and at our annual review with the entire school leadership a few weeks ago, Laura

and I were admonished for not managing you strictly enough and failing to ensure that you follow school rules. That's the OTHER conversation that led to today.

We were repeatedly reminded that you are a staff member; that any major travel, hires, fellows, spending need prior approval, because that is school policy; that any large convening needs to be faculty led; that you need to be in the office a minimum of three days a week and, without a specific approved accommodation from HR and the Dean, have been in violation of that school-wide rule. That OFS had flagged repeated instances of excess spending that we had not blocked; that RAO [Research Administration Office] had concerns about a mismatch between grant narratives, budgets and actual staff time allocations. And on and on.

Our effort to understand the nuances of the situation and find creative solutions has led to our being accused of failing to appropriately oversee your work, travel, staffing, spending and adherence to rules. What you were hearing today was obviously aimed at providing you greater clarity, but it was also the Dean telling us that he expected us to be much more hands on in administering the restrictions he has imposed as well as the rules of the university. So I will follow up with a memo about how to implement this going forward.

Yes, we can absolutely agree that this is a painful experience. Our principle goal is doing excellent work that advances understanding, equity, truth and trust. I too am concerned about your team and the prolonged uncertainty they are dealing with. Your insistence that you have been nothing but truthful with Laura and me means that many other people that have come to us must be lying. Again, I've attributed this to the reality that this situation is hard and so declined to confront you when faced with a serious misrepresentation.

To give you just one example, (which contradicts your assertion today about your interactions with the board) [SHORENSTEIN ADVISORY BOARD MEMBER 1'S NAME REDACTED] reached out to me because you'd called him, very upset that you had just learned the board was meeting and hadn't been invited, and that Harvard was trying to push you out and keep your money. But you had known about the meeting for weeks. You were invited to the dinner. **And I was present when Doug explained in detail that your grants would follow you wherever you went, and that these transfers happen all the time.**

So if anything, the message I've been given is that I failed to confront you about disturbing behavior or alert others at the school about it. Laura and I were working hard support you and your team, and try to find a path to a good outcome that caused the least damage to everyone in a difficult situation. But from your note, it's plain that you

did not see it this way, and of course we've been clearly directed on how we are to manage everything going forward. I too so wish none of this had happened this way.
Nancy

169. With regards to [SHORENSTEIN ADVISORY BOARD MEMBER 1], I had forgotten about that conversation during the course of the brutal and emotional meeting in the Dean's office. For context, Nancy is referencing to [SHORENSTEIN ADVISORY BOARD MEMBER 1], a member of the Shorenstein Board, a lecturer at the Harvard School of Public Health, and a friend to Ms. Gibbs. [SHORENSTEIN ADVISORY BOARD MEMBER 1] contacted me to ask for a meeting when he was in Boston for the Fall Shorenstein board meeting. He wanted me to guest lecture in his public health course in December. On 11/8/2022, I reached out to [SHORENSTEIN ADVISORY BOARD MEMBER 1] confidentially to ask him for advice about looking for a job at journalism schools. I was in conversation with another Dean in a journalism department and really needed guidance professionally. He immediately offered up that Ms. Gibbs told him that Dean Elmendorf was shutting me down. He said that Ms. Gibbs was on my side. He warned that I did not want to make Ms. Gibbs "an enemy" and that "the best revenge is being successful." He spoke highly of a few journalism programs. We closed the fifteen minute call planning my guest lecture that took place on 12/2/2022. I did not ask him for help, or to step in, nor did we get into any details. In the Dean's meeting, I forgot I even spoke to him because the conversation was so brief and insignificant given what was happening.

170. I waited a day to respond to Ms. Gibbs because I was so completely stunned by her brand-new allegations of "disturbing" behaviors and misconduct. Rather than acknowledge that she and Ms. Manley had been lying to me in a persistent and concerted way, she went on the attack and called my behavior "disturbing". Now she was claiming I had violated numerous workplace policies. I challenged Ms. Gibbs in my email response to document these violations with HR. Previously, I worked at a non-profit and so I was familiar with standards for expenses. I took great care to ensure the TASC team made economical purchases. The Shorenstein Center Finance Manager directed the TASC team to use HKS' "Egencia" service for travel, which I found to have inflated some prices. I no longer held any hope about being able to stay at Harvard. I sent this reply to Ms. Gibbs on January 7, 2023:

Hi Nancy,

Thank you for the response. You were right that I forgot to mention [SHORENSTEIN ADVISORY BOARD MEMBER 1]. He basically reassured me that you were working in

my best interests and suggested I not speak to anyone about it. Talking to him slipped my mind due to the intensity of the Dean's meeting.

Please forgive the oversight. I sent a correction to the Dean. As for what happened in your meeting with leadership, I am deeply sorry that you have to navigate this. Can you tell me what behaviors were labeled "disturbing?" This is not a word I take lightly as it implies a mental health problem. It's triggering.

In the two previous meetings with the Dean, he did not bring up any behavioral issues, nor did he cite any policy violations or other fire-able offenses. So, I find it very overwhelming to read your listed transgressions. While I have never challenged that I am losing my job because HKS leadership has decided to terminate me, I disagreed with the targeted restrictions placed on my team because they are designed to throttle our research and public impact. It has created tense working conditions, where I am now isolated and understaffed, and imperils my projects that are designed to have broad public impact.

I maintain that my current actions are consistent with acceptable actions in the past. As I interpret this email, you have been asked to closely monitor my movements, spending, and communications. My team has worked with the finance director and communications director to ensure compliance with university rules. Below I will explain processes we have followed for clarity.

On some level, I have to imagine that you see what is happening to my team and understand my predicament as the steward of one of the hardest working teams in this field. I came to Shoreline after being given a job offer that was an utter lie. I stayed because I thoroughly loved working with you and Setti, not only because you saw the passion and value of my research and educational programs, but also because you had the same mission as me; to share the light with the world. I helped recruit Laura because I believed she could inject some energy into the center around policy and government. Somewhere along the way, things changed, we argued about money, and it's time to part ways.

I accept this and still think very highly of you.

I will try to explain here what has gone into TASC's decision-making in the last few months.

1. On the experience of my termination, it seems to me that there is a major rift in perspectives here. Whatever the euphemism used (fired, losing my job, wound down, asked to leave, let go, not renewed...), you are right that I use humor to cope with this

major blow to my career. Since you spoke to me I have refrained from saying "fired." I don't think telling a joke is the same as seriously claiming I was fired on the spot. This is nitpicking though. With this most recent restriction, I understand that under penalty of punishment, I cannot speak of my personal experience.

My experience of losing my livelihood is one of pain, loss, and confusion after all I have done to bring the Shorenstein Center back into the good graces of donors and the academia. After significant losses of major programs, like the Ida B Wells Society and the Information Disorder Lab, I struggled to find donors to support research and educational programs. You know that I put my reputation on the line to recuperate the center in the eyes of donors, government, tech companies, journalists, and fellow academics. My team continues to be a major draw that brings new philanthropists and faculty interest to the center. I have NEVER stalled when it came to bringing praise and funding to the center.

Now that I am being asked to leave- and I indicated my desire to move to Berkman- I am perceived as competition. While grants do go with me, the \$2.6M in gift funds do not. They can only be spent at Harvard, so leaving Harvard does mean sacrificing a significant amount of capital. I asked the Dean if he would be willing to return the funding to **[Donor E]**, but I doubt he will.

I have been in contact with Berkman since August about a transition, even before I met with the Dean, which became much more complicated in September for reasons described as "university politics." Gary King of IQSS recommended that leave Harvard as soon as I can because I was the dean's "persona non grata" and nothing good could come of it.

I await advisement on the Dean's new restriction of a coordinated effort to offer the Shorenstein center's supporters "a consistent and accurate explanation" of my termination. Bear in mind though, the explanation I have been given thus far, that "projects must be led by faculty" is not consistent with the rules of the university.

As I have told you when I look for a job at other universities and explain that "only faculty can lead projects at HKS," I'm met with incredulity, as all major universities carry similar rules that allow deans to grant permission for PI status. I know this is minutiae, but this is how your version of my termination is received by academics.

As far as I knew over the last 3 years, I had been given permission to PI a project. The most accurate explanation is that HKS and Shorenstein leadership decided to terminate my employment and the TASC project at the Kennedy School.

As well, on current sponsored grants, the co-PI is Latanya Sweeney, a faculty member at FAS and HKS, who I collaborate with and has PI rights. These foundations will need an explanation that I am being terminated. She has been faculty co-lead on the project for over a year now.

2. As for violating the working from home policy, I didn't realize it applied for work travel. I worked over 40 hours a week and came in on the days I was in Massachusetts, usually Mondays, Tuesdays, and Fridays, but didn't always come to Shorenstein as I was at conferences/exec ed/ and lectured on various parts of campus. My dedication to the job has never been questioned. I took a week vacation too.

As it is implied, I did not intend to violate the policy because I was not working from home.

Nevertheless, I am seeking advice from HR about how to proceed with WFH accommodations due to a confidential issue that arose on December 12.

Based on this email, I am now concerned that I am being monitored in ways that I was not aware of. How am I being tracked? Is the attendance of other staff also under such close scrutiny?

3. On conference procedures and policies: Technically, the grant about the PII conference is under Professor Sweeney's name as well. Since arriving at HKS, I have hosted six conferences and have not deviated from the processes we used in the past. There is precedent for the PII conference design pre-pandemic. In 2019, I cohosted a LARGE conference of over 200 people in collaboration with Berkman Klein. It was attended by students, fellows, and faculty and led to 15 peer reviewed articles in two special issues, including the International Journal of Communication and the Misinformation Review. As well, our virtual "true costs of misinformation" conference last March had 150 participants and we are producing a special issue for IJOC. Even when I was employed at Data & Society in 2018, I collaborated with the Shorenstein Center and Berkman to host a conference with 200 attendees on misinformation, led by [NAME REDACTED] and [NAME REDACTED] as well as faculty at USC. Far from raising my professional profile, conferences are opportunities for field-building and knowledge production, a core component of scholarship and TASC's research agenda.

4. On over-spending: In the past, I was only ever made aware of one over-spending error related to the jackets, which [NAME REDACTED]- the [former] finance director- told me was an acceptable bonus for my employees. When it was brought to my attention that this was not true, I immediately offered to pay out of pocket for the expense to remedy the issue. I was told by Laura Manley that I didn't have to. Since then, neither I or my staff have been made aware of any overspending problems. We are currently

working with [SHORENSTEIN FINANCE MANAGER'S NAME REDACTED] on a contract for the in-person newsleaders event and [SHORENSTEIN FINANCE MANAGER] is leading the negotiations on the price. Please let me know if this is okay. The major expenses for TASC have gone through the finance department channels, where large contracts are paid by the center's credit card. All travel is booked through Egencia in accordance with university policies. Sometimes Egencia prices are higher than other travel websites, but we go through them anyway. We continue to rely on the center staff for help to navigate spending.

5. RAO's concerns about grant narratives and staff allocations is something we have been working hard on with [NAME REDACTED], the current finance director, ever since it was discovered how poorly [REDACTED], the former finance director, maintained records. I was only made aware of [redacted]'s egregious errors after struggling for months to get her to provide insight to us. I believe you had the same problem with her that led to her termination. This administrative paperwork is handled by [NAME REDACTED], my program manager, who meets with [REDACTED] weekly to keep this on track. If there are issues, please let me know as soon as possible so that we can fix the errors. We will make any adjustments necessary.

The Dean suggested that there may be more restrictions to follow, but that he doesn't know what. This is very intimidating as it appears that I'm going to lose my job earlier for unforeseen reasons. How to navigate that?

Lastly, and most distressing, by creating a system of new rules specifically for me, and then apprising me of unacknowledged violations of new and standing rules, I'm very fearful of being terminated before June 2024. With the increased intensity of scrutiny described in your email, I am being singled out and closely monitored by HKS leadership, and now you will micro-manage me and my team. The dean signaled heavily that should I leave, everyone who works for me will lose the jobs and healthcare. I've never been in such a depressing bind. I'm being real when I say, it was easier to get divorced.

Nancy, whatever you've come to think of me, the TASC team does not deserve this. The team consists of world renowned scholars, journalists, practitioners, and educators that have done amazing work on some of the most toxic and violent subjects. They brave harassment, death threats, see the most awful atrocities up close, in order to bring new knowledge to those who need it. Their research and educational programs have influenced governments, tech companies, journalism, public health, and advocacy. The research is cited in multiple academic fields from sociology, anthropology, computer science, psychology, cybersecurity and more. We stand alone in the field as a team who

rejects the power and influence of technology corporations. I can't tell you how rare and magical this group is. They should be celebrated, not boxed in.

The TASC team's reality is that we are facing isolating restrictions for the purpose of preventing our research from becoming more publicly accessible. And for what? These restrictions have profound impact on our careers and ability to meet grant requirements. If we take at face value that "projects must be faculty led" then what is the real purpose of all of these restrictions? That rationale for termination is incongruent with the penalties, don't you think? The most important value of a university is to generate knowledge and use it to improve society. This is what I was hired to do and it's what I've been promoted and given raises for doing. I'm not fighting to stay. I'm advocating for my team's livelihood as we try to find a new place for our work.

Best,
Joan

171. Ms. Gibbs followed up via email – *notably absent any references to the vague policy violation allegations she had made earlier.*

Hi Joan,

I know there's a lot that you're juggling, and especially your concern for your team and how things work out for them. For now, I think the best course is for you to come up with the wind down plan the Dean asked for; once we have that, we can figure out a good communication plan—internal and external. Obviously nothing prevents you from talking to people about your personal experience; it's just that when people hear a consistent message, there's less risk of confusion or misunderstanding.

Also, let me know if you need any help from me or [NAME REDACTED] or anyone else in drafting the plan. There may be issues around staffing and term appointments that HR can help with too. If you have questions about grants and gift terms and policies, we can help sort those out.

I'm sorry this is so hard on everyone; I really want this next process to go smoothly for everyone.

Take care,
Nancy

172. Unbeknownst to me, at that same time, Dean Elmendorf was about to be exposed by Ken Roth, the founder of Human Rights Watch. Mr. Roth alleged that donors influenced Dean

Elmendorf to rescind a fellowship that was offered to Mr. Roth by The Carr Center for Human Rights at HKS. Mr. Roth's story was corroborated by the tenured HKS faculty member and director of the Carr Center, Mathias Risse, who told *The Chronicle of Higher Education* in reference to Dean Elmendorf's claim that Mr. Roth exhibited an "anti-Israel bias," Mr. Risse was quoted, "The point wasn't so much that Doug Elmendorf thought that, but that 'some people in the university' who mattered to him did."¹⁴ The story was national news and *The Nation's* reporting painted Dean Elmendorf in the same light that I saw him; someone eager to use his power to please donors.¹⁵

173. Mr. Roth penned an op-ed published by *The Boston Globe*, which closed with this:¹⁶

As the wealthiest university in the world, it can certainly afford to take a principled stand with donors.

To dispel any doubt about its commitment to academic freedom, Harvard should clarify that it will not accept contributions from any donor who tries to use a gift to undermine academic freedom, and it will prohibit administrators from penalizing academics in response to expressed or feared donor objections. That would at least make something positive of this sorry episode.

174. My work on the assigned "wind down plan" was made very difficult because I was having trouble getting the Shorenstein Center's Finance Manager to give me an audit of all TASC's current funding and a projected run rate for February 2023 - June 2024. Meanwhile on Jan 19, 2023, Dean Elmendorf sent a mass email explaining his reversal to allow Ken Roth to have a fellowship at HKS after much media pressure. The very same day I received an inquiry from the Harvard Crimson Newspaper asking for an off-the-record interview, the reporter wrote, "I am reaching out (and cc'ing The Crimson's new HKS reporters) because we heard a tip about tensions between you and Dean Elmendorf and that you might be departing HKS soon."

175. I immediately forwarded this email from *The Crimson* to Ms. Gibbs and to HKS HR because I did not want to be in violation of the new restriction on not speaking unless it was coordinated with the Shorenstein Center. I do not know who gave the blind item to *The Crimson*, but it

¹⁴https://www.chronicle.com/article/a-human-rights-leader-was-denied-a-harvard-post-over-alleged-anti-israel-bias-now-a-dean-faces-calls-to-resign?sra=true&cid=gen_sign_in

¹⁵ <https://www.thenation.com/article/society/israel-wexner-harvard-kennedy-school/>

¹⁶<https://www.bostonglobe.com/2023/01/17/opinion/harvard-needs-stand-with-its-principles-not-wirh-israel-or-its-donors/>

occurred to me that someone who knew about the situation was targeting Dean Elmendorf during a vulnerable moment in his career.

176. On January 20, 2022, I received an oddly cordial email from Dean Elmendorf:

Hello Joan,

I know that you are working on the long-term plan for the wind-down of TASC. I'm looking forward to having the chance to understand better your plans and goals, and then to working together to find ways to support your goals. I just want to let you know that I'll be traveling next week and so won't be able to respond immediately.

I also want to reiterate that we want to make this transition as smooth and productive for you as possible. Once we have some more concrete ideas in hand, you and I and Nancy and Laura can discuss different ways we might facilitate that.

Best,
Doug

177. I was hospitalized that entire week due to exhaustion, dehydration, and stress. It struck me that Dean Elmendorf's unusually cordial email to me was a pre-emptive effort on his part to soften my reaction to his heartless and brutal treatment since the time of the Dean's Council meeting in 2021. I believe he sensed that *The Crimson* was going to write about shutting down the TASC team. I responded to Dean Elmendorf:

Hi Doug,

A couple of things. First, I'm currently hospitalized at MGH and do not know how many days I'll be here. I've been very sick all week, but I've tried to power through it to meet this deadline. However, my blood labs came back all out of skew and my doctor thought it best to admit me.

Second, the finance folks at Shoreline have been unable to get me any draft budgets to work from and don't anticipate having them ready 'til Tuesday morning. I would like to take some more time to weigh the different pathways before submitting them to you.

Of course, this is all pending if I'm discharged this weekend. When I get this sick, it can't take a while to stabilize.

Would an extension to Jan 31 be okay?

Sincerely,
Joan

178. Dean Elmendorf responded, again in an uncharacteristically cordial way:

Oh, Joan, I am so sorry to hear this. Please take care of yourself first and foremost, and let me know if I can do anything for you while you're sick.

Of course we'll just suspend the timetable until you're out of the hospital and feeling better. I certainly don't want you to "power through" a medical issue. And I understand that you need useful finance information as well.

Once you're back on your feet *and* you have the information you need, then just let me (and Nancy and Laura) know what timing seems reasonable to you.

As I wrote, I'll be away for much of next week, but I'll keep an eye on email over the weekend, and you can reach me through [NAME REDACTED] next week if I can help you in any way. I hope natural resilience and modern medicine will have you feeling better soon.

With concern and best wishes,
Doug

179. I also informed Ms. Gibbs, Ms. Manley, and HKS HR about the hospitalization because they were also waiting for the TASC exit plan.

180. On January 24, 2023, one day before I was supposed to submit the exit plan to senior leadership, I finally received a skeleton budget from the Shorenstein Center Finance Manager:

Budget Category	FY23 Reforecast Budget	FY24 Budget
<i>Sponsored Balance</i>	1,769,803	782,835
<i>Gift Balance</i>	2,568,602	1,693,400
Revenue		
Sponsored Revenue	954,000	
Expense		
Salary & Wages		
Exempt Staff	757,843	802,798
Union Staff	63,510	60,029
Post-Docs / Fellows	384,336	124,600
Temp / LHTs	147,619	45,600
Other Compensation	6,920	6,000
Fringe		
Fringe	406,500	378,352
Fieldglass/Contracted Workers	244,670	125,000
Supplies & Materials	18,400	18,500
Prof Services	161,570	100,000
Events & Convenings	44,100	38,200
Travel	170,590	132,050
Total Direct Expense	2,406,058	1,831,129
Overhead / Admin Fees	437,244	353,534
Total Expense	2,843,302	2,184,663
Net Result	2,449,103	291,572

181. Although I doubted these numbers because I didn't have clear insight into each budget and expense, I used this budget to create an exit plan that carried most of my current employees through June 2024. I submitted the plan to senior leadership on 1/31/2023 and asked for more help with accounting.

182. I received a follow up email from Ms. Gibbs on 2/1/2023:

Hi Joan,

Thanks so much for the document you sent – We look forward to looking at it in detail to help us work together on the wind-down. I assume there will be some questions on some of the items, so we'll continue to discuss it to ensure a smooth transition for everyone.

I also wanted to let you know that, as you suspected, the Crimson does appear to be doing a story on this topic and the reporter reached out. While the school commented on the TASC project, it does not comment on any personnel matters.

Wishing you well,

Nancy

183. I quickly followed up with a reply:

Hi Nancy, Dean Elmendorf, Laura, and Sarah,

I have not spoken to the Crimson because the last set of restrictions said I must coordinate a statement with Shorestein. I misjudged that I would be extended the same courtesy by the school.

Is it possible to let me know what the school has commented?

By giving them comment, something that could have just been a stub in the crimson is now going to be a much bigger deal and might even get me or my team harmed. If it is perceived by the far right that my employer does not support my research, I will be targeted for harassment and maybe worse. It's unfair for the school to put me and my team in such danger without discussing with us, particularly after insisting on my cooperation.

As for making a comment about TASC in an article about me, I want to be clear that I do have rights as an employee, including a right to privacy. I have never gone public about my termination or about my job search, but your statement will force that into the light. Further, suggesting that you're making a comment about TASC and not talking about personnel, when you're obviously talking about my project and career, contradicts the claim that HKS does not comment on employee matters.

Maybe it's just a technicality I don't understand because I'm not a lawyer, but it's targeted and intimidating nonetheless.

I did not want to have it out in the press. This is really awful.

Best,

Joan

184. I knew that any negative news about me or the team would lead to serious death threats and harassment – because this is a prior lived experience – and the consequence of my rigorous

research methodology and commitment to public awareness. I sent this email to HR on the evening of January 19, 2023:

Hi Pam,

Just wanted to flag this.

The Crimson reached out to me for comment about my departure from the Kennedy school. I don't know who gave them the tip and I told them I am unable to comment. (See email string below) I just wanted to flag this so that if they do publish, you are aware that I have followed the dean's restrictions about me talking about my termination. The dean said, "On communications with supporters of the Shorenstein Center and of Harvard more broadly: It's important that members of the Shorenstein advisory board and other donors and grantors hear a consistent and accurate explanation of what's happening with you and your project. I expect that you will coordinate with Nancy and Laura on an ongoing basis to be sure that is happening." Given all that is happening, I don't know how to proceed. The narrative that I was given is "that only faculty can lead projects" and that he seeks to "reduce the profile" of my research. I was hired as a project director and promoted to research director of the center because I do excellent public scholarship. This is not something I want to debate in the press. The narrative I would tell is different from the narrative of Shorenstein, precisely because of the way I am being treated currently and how the Dean's focus on limiting my public profile is causing him to make up rules that only apply to me.

I am seeking a new place for my team because the dean told me that I don't have academic freedom and because he has ordered strict scrutiny of our budgets, forbid me from fundraising, has made it difficult to hire anyone, and limited how we execute our program deliverables. His made-up restrictions and Laura's harassing behavior are causing me extreme stress and hastening my exit. I do not believe they want me to stay until June 2024 and any move I make will be considered in violation of some new rule that only applies to me. In the August meeting with just me and the Dean, he told me he would not approve any thing that involved making my research "more prominent." I read this as reducing public access to my research, which is something that I am very concerned about. Most of my grants and funding are a result of my "public impact" on issues related to technology, journalism, and democracy.

I specialize in online communications, which has become an important topic in the media. I have built my career on my independence and I have never taken money or data from these corporations for research. I am very unique in my independence which is why journalists routinely come to me. The dean's focus on reducing my profile seems calculated and extends beyond any routine level of professional scrutiny from someone at such a high level of a university. The dean insisting that I don't have academic freedom

and doing what he can to prevent my team's work from being publicly accessible isn't normal.

It's one thing if I am no longer allowed to run a project, which he is within his right to say, but it's another thing to say "only faculty can run projects," which does not seem to be written anywhere.

I believe he can accomplish this goal of terminating me without threat of limiting my public stature. However, this is the route he has chosen. My reaction would be different if we were allowed to run our program like normal and meet the expectations of our supporters in our exit.

This is causing additional anxiety, fear of increased scrutiny and retaliation. I did alert Nancy and Laura about this should they be at liberty to make comments to the Crimson. Anyhow, the cat's out of the bag and I don't want to lose my job. I'm doing everything I can here to try to salvage this sinking ship, but if the crimson prints a story about this, it's out of my hands.

Best, Joan

185. I sent an email to colleagues on the evening of February 2, 2023, to warn of The Harvard Crimson article:

Hi all,

On Thursday, Harvard University's newspaper "The Crimson" is going to break the news that the TASC project at the Kennedy school is being terminated in June 2024. Dean Elmendorf recently stipulated that "only full faculty members can run long-term projects at HKS."

While I was hired as the TASC project director in 2018 and was promoted to research director of Shorenstein in 2020, this rationale comes as a big surprise. If I had known that we would be dismantled before the 2024 election, I would have built our project elsewhere.

Despite this set back, the TASC team remains committed to improving the research field with our remaining time at HKS. In the meantime, we will be looking to find a place where our academic freedom will be protected by university leadership.

I believe the greatest demand of any scholar is to share the light with the world. We will not let this latest obstruction dim our shine.

Happy to field calls [redacted] on this or reach out for a meeting.

All my best,
Joan & The TASC crew

186. Nevertheless, I filed a third complaint 02/02/2023 to HR about violating my right to privacy as an employee by commenting to the press, no response on asking to have the balance of the [Donor E] funding returned, failing to address the exit plan or provide proper contracts to my employees. I messaged Ms. Cozza:

Hi Pam,

I bcc'd you on some more correspondence from Nancy about the crimson article. I don't know who is leaking to them but I was shocked to see that the school had made a statement. I don't think this is fair that I would be told I must coordinate a statement with Shorestein and then have the school make a statement about my project, while pretending it was not a comment about my employment status.

What are my rights here? I've been doing everything I can to keep to these restrictions, but I am aghast that the school is not required to follow them.

I believe this is another form of retaliation and an attempt to get me to resign. Moreover, for my personal safety I need to know when the school is going to be making public statements about me or my research.

I have put my social media on lock and depending on the harassment may have to alert local police in case of swatting.

187. Ms. Cozza Replied that day:

Hi Joan,

Thank you for making me aware, I saw the Crimson article this morning. Regarding your personal safety, I have alerted [HARVARD DIRECTOR OF SECURITY OPERATIONS NAME REDACTED] at HKS of your concerns as noted below. If you see or experience any suspicious behaviors or activities, you should reach out to [HARVARD DIRECTOR OF SECURITY OPERATIONS] directly at [PHONE NUMBER REDACTED]. And if there is anything imminent regarding your physical safety, you should contact HUPD at [PHONE NUMBER REDACTED] if on campus, or your local police if working remotely. In the meantime, if you would like to meet with me again, please let me know.

Thank you, -Pam

188. I responded the same day:

Hi Pam,

I would like a meeting because I don't understand what my rights are as an employee.

I did not make a comment or talk on background to the Crimson, but the school gave a statement about me.

On Jan 5, I was told that I must coordinate with Shorenstein and then Nancy sent an email to the whole center without coordinating with me.

Further, the story about this policy abdicates responsibility for terminating my project. The statement itself does not recognize that the Dean has made this decision, along with Nancy and Laura. That's the truth.

The way it is worded now implies I'm not an academic or intellectual lead, a job I was originally hired to do.

Lastly, there is no mention of Doug's other stated goal which is to reduce the profile of my projects.

How is it fair to me as an employee to leave these pieces out?

Most suspiciously, the article does not say that the Shorenstein Center, Nancy, or Laura declined to comment.

At what point is HR going to help stop this harassment?

Sincerely,
Joan

189. I reported some death threats to HKS security and HR, but nothing was done. Here is an example of an email which was sent to several hundred people with my email address:

MAKE AN IMPASSIONED FAT GIRL, STUPID FAT SLOB PLEA FOR MERCY ON GOOD MORNING AMERICA AND AFTER THE STUDIO AUDIENCE BOOS YOU AND GIVES YOU MULTIPLE THUMBS DOWN, THE MIDDLE FINGERS, AND THROWS UNOPENED PACKAGES OF SARA LEE POUND

CAKE ON THE PODIUM/STAGE...COMMIT SUICIDE RIGHT THERE ON LIVE TELEVISION!!!!!!

Another email read:

all this disinformation comes from the stupid liberals.... you fucks are the kings and queens of lying and spewing your hate for anything you don't like..... go to a socialist shit hole country.... O wait they have not enough food to feed your fat ass. CNN, MSNBC, ABC,CBS, NPR, and all the other dumo rat outlets repeat lie after lie.... and you assholes are proven wrong every fucking time.... I hope all you a holes at Harvard are visited by a mass liberal shooter and like all you POS up... you scumbags earned it. Keep lying you fat fucking troll

And another:

shoot yourself in the face, it would feed an entire country for decades

I received hundreds of messages on social media that were gloating, insulting, harassing, and threatening.

190. I sent an email on 02/03/23 to Ms. Gibbs reminding her that I have a right to privacy:

Nancy,

I am cc'ing Pam from HR because I believe my rights as an employee are being violated. You've effectively silenced me by restricting me to statements that must be coordinated with Shorenstein. Now you're holding a center-wide meeting about me and my research team that I wasn't even asked to be part of. I have a meeting with students at that same time.

Why do I have to abide by this restriction to my speech if you are doing nothing to include me?

Someone also leaked your email to Shorenstein today to [REPORTER'S NAME REDACTED] before I even saw it. Then somehow the crimson and Wapo had it. It was a de facto press release from you and its backfiring.

If you were concerned with accuracy, then you would also tell the part where Doug said I don't have academic freedom and then restricted our ability to have public facing outputs because he wanted to lower the profile of my projects.

This isn't simply about a policy implementation issue and you're exacerbating tensions by claiming as such.

Everyone knows from here to Belfer that our research has been obstructed for months by the Dean.

The more you say on this issue, the more questions are raised and the more the press believes there is a cover up. I want you to stop presenting this half-truth.

I wish you would protect my right to privacy.

Sincerely,
Joan

191. Nancy responded the same day, where she admits that she does not know the policy on employee privacy. I do not know if she followed up with HR.

Hi Joan,

I defer to Pam [MS. COZZA] regarding your rights as an employee, which she understands better than I.

My understanding is that everyone is trying hard to protect your personal privacy. Perhaps not surprisingly, there is a great deal of misunderstanding around all the circumstances, starting with the Crimson headline that the Dean has pushed you out; what he communicated was a timeline for the wind down of a project, according to HKS policy and long-time practice.

My belief is that the most productive approach we can take is to continue to review and discuss your plan for winddown, to figure out the best ways to keep the good work of Tasc moving along in line with the requirements and expectations of the grants and gifts as the wind down happens, and work together to do all that smoothly in everyone's interest.

Best,
Nancy

192. I had a one-on-one meeting with Ms. Cozza, where she told me that HKS is making statements about the "wind down of TASC," but not about me personally. I told her there was no difference between the two and that they were using my name in these statements. By this time I understood what I was up against at Harvard and felt I needed to prove my innocence here. On 02/04/2023, Ms. Cozza sent her this email to prove that I was not to blame here, but I do not know if she investigated this:

Pam,

I was not included on the email from Nancy to the board today, but it was promptly leaked to the crimson and the boston globe, who just contacted me about it.

Yesterdays' email from Nancy was also leaked to media. The ceo of the [REDACTED] is a good friend of Nancy and board member of Shorestein, [SHORENSTEIN ADVISORY BOARD MEMBER 2'S NAME REDACTED]

This time with the board email, however, neither me or my team were included on that email. I am mentioned by name in the email. Again, Shorestein is not following their own restrictions they placed on me.

If there is any doubt left that I am the one leaking this information, please investigate who received this email and to narrow down who is most likely using the press to drive this media cycle.

This latest leak is evidence that I had nothing to do with this, but squarely shows that someone from leadership is making this controversy.

I don't think it's fair and I do believe it's retaliatory.

I raise this with you because I need help here. I am being targeted by my supervisors who don't want the blame for dismantling my program.

All of the claims about wanting a smooth transition are just hand waving at this point. I need an HR advocate. I need the intimidation to stop.

Best,
Joan

193. I also messaged Ms. Gibbs:

Nancy,

If you're committed to a smooth transition, then why not include me on the email to the board today? It was promptly leaked to the crimson and the Boston globe which asked me for comment.

Strange coincidence, don't you think? [REDACTED].

The meeting you held today gaslit the whole center, including several people off my team who are now making it their business to dig into these issues. I don't want people distracted by this bogus policy.

Just say what is happening: the Dean is deciding to shut down the program.

Doesn't matter the timescale because he is also obstructing our research and the public's access to our work.

When you tell half-truths, the staff come back with major questions about the integrity of you and the center as a whole.

The claim that there is no faculty PI on the team erases the contribution of Latanya for the last year+. Remember that I recruited her to the center? She shouldn't be paraded around in the press as someone doing misinformation research. It's a fundamental misunderstanding of what we research and what it takes to do this work. Further, she would disagree with this characterization of her work.

I believed you would advocate for us to get our work done and do it in a way that benefits the public interest.

I understand you want me out of the center and I see these leaks as an attempt to get me to resign. It's completely unfair to require that I coordinate an "accurate and consistent" statement with you as your private emails keep appearing in the inboxes of the press.

-joan

194. On 02/06/2023, HR contacted me to approve the extension of the TASC team through 06/30/2023, while we await the decision of HKS leadership on the TASC exit plan. I responded by saying,

Thanks Jen.

Any idea when I will know if my team is extended appropriately based on the agreements made with me? I have been talking to Pam, but I don't feel like I am properly understanding my rights as an employee.

For example, there is a lot of new details in this new report from [REPORTER NAME REDACTED]:

<https://www.semafor.com/article/02/05/2023/inside-harvards-misinformation-meltdown>

As well this new report contradicts what Nancy told everyone on Friday that she had only been informed of the Dean's decision. Here it says she agreed with him. If that's the case, I need to know when this agreement was made as I was being encouraged to seek a grant for Shorenstein, to the tune of \$20million, about 2 weeks before the Dean told me of my termination.

I was also told that the press office sent Nancy's board email about me to the crimson and boston globe. I never saw that email, but I do feel like I'm being targeted to pressure resignation. I've felt this way since Laura told my employee I was a "liar."

As well, the details in this new piece about the misinfo review retraction were surprising so I felt I had to speak out because of all the harassment I am getting for [NAME REDACTED]'s project. There was an attempt last October to coerce me to take the blame publicly for the retraction via a letter. I informed Nancy, Laura, and Sarah Wald about it. Very few people knew about this but it seems like this reporter was tipped off about it.

I feel like someone from leadership is leaking to the press and it's leading to harassment and death threats. I need some help here.

As well, I believe my team's contracts are being used to keep me from speaking up in this difficult time. I was told by the dean in email and verbally that any statement I make has to be "accurate, consistent and coordinated" with Shorenstein and it's not fair that they aren't even including me on emails about me.

Best,
Joan

195. After missing a morning meeting with Ms. Cozza on 02/07/2023, I sent her this update:

Sorry Pam, I ended up back in the hospital last night and i am just getting released now. My apologies.

I am grateful and appreciative of your time. Will have to reschedule for Thursday morning, if you have time then? I could do 10-12pm tomorrow over the phone but I am seeing doctors in the afternoon.

I am really concerned that Nancy's emails keep appearing in the press. A journalist told me this weekend that the HKS press office sent them the email that Nancy sent to the board. Is it the case that the press office is releasing emails?

If so, how am I supposed to respond to this as an employee, how do I make a complaint?

It's driving a media cycle where I still don't feel like I can speak up for myself or my team. I was surprised yesterday that the team were only renewed through June 2024, when we have been waiting since November for an answer to the question of renewals.

196. Ms. Cozza was careful not to answer any of my questions via email. HKS HR did reach out to extend the contracts of the remaining TASC team until June 30, 2023. On 02/09/2023, I sent another email requesting a follow up meeting to address this and other mounting issues:

I am concerned that the crimson published another article today with new quotes from the HKS press office about the time to exit.

None of these articles include information about the harassment by Laura of me through my postdoc or the restrictions put on me by the school, including the decision to reduce public access to our research.

I have one researcher, [NAME REDACTED], whose entire year of work products have been shuttered by the dean, including the podcast and conference.

As well, I am very concerned that the one-sided story told by the university is creating a situation where my team is increasingly feeling like pawns in the university's hands.

It's one thing to say publicly we have til June 2024, it's another thing to not take action on contract renewals for months and then respond with less than year appointments this week.

These actions by the university continue to gaslight the TASC team and as a result they are now spending a good deal of time looking for new jobs. The reason being that the hostile working conditions are undesirable for everyone.

I am concerned for [NAME REDACTED] who is struggling with cancer and needs consistent access to healthcare right now. The stress of the job renewal has become a constant concern.

This week I was informed by my data scientist that he is taking another job because he sees the writing on the wall.

Again, I don't believe the university is telling a fair story to the press and it's affecting my employees. Again, I believe the whole story would die down if the university stopped

giving quotes to journalists and instead help us focus on ensuring continuity of work so that we can leave Harvard proud of ourselves.

No one from Shorenstein has reached out to coordinate any story with me, and I know they can't really stop me from talking to the press to defend my team, but I just don't know if there's a penalty that I do not know about.

I continue to believe the school is pressuring a resignation from me and using the press to do it.

Best,
Joan

197. On March 2, 2023, Ms. Gibbs returned feedback on TASC's exit plan to me and the entire leadership of HKS. She wrote,

Dear Joan,

Thank you very much for sharing your proposal for winding up the TASC project by June 2024. I have conferred with Doug, [NAME REDACTED], Sarah, Pam and [NAME REDACTED] to understand better the details and provide this response. At a high level, the plan seems like a very good start, though the HKS leadership and I do need additional clarity in a few areas. Once finalized, this plan will provide the foundation for your team to be able to keep producing the work to which TASC is committed, and make sure we all have a shared understanding of the path ahead.

The next step is to clarify the following:

1. Sponsored Funding: With TASC's current staffing and run rate, all sponsored will likely be spent down by Dec 31, 2023, except for one **[Donor H]** grant.
 - a. The **[Donor H]** grant currently supports two staff people ([2 NAMES REDACTED] at 40%) and ends September 2024. We can request a re-budget from **[Donor H]** and move more staff onto that grant as other grants run out.
 - b. Do you still intend to finalize the **[Donor C]** grant supplement project for \$150K, in which case the specific scope of work and budget needs to be submitted to RAO/ADO for internal review and approval prior to OSP accepting the funds.
 - c. We assume this plan provides for all the terms of the current grants to be met, and the RAO team will continue to work with you and the Shorenstein Center staff, as they do

on all sponsored funding, to support the documentation, reporting and other administrative aspects.

2. The Team: Based on the information and plans you've provided, , we can extend all of your team that you have requested until at least September 30, 2023. (this includes all of your six staff, two fellows, and up to eight non student LHTs. And one fellow to be extended only until 8/30/23 per your plan.) Ideally, it would be best to extend them once, to what we believe will be their actual term date. In order to extend individual staff or other team members beyond 9/30/23, everyone will need to understand how they will be funded and what they will be working on, as outlined in item #3.

3. Gift funding: As almost all of the grants will be completed by December 2023 (with most completed by September), HKS leadership and I will need to know what research you plan to continue through June 2024, with what staff and how that work will be funded (presumably through the **[Donor E]** gift, since all grants will have ended). We would like that plan no later than 7/1/23, but the sooner everyone can review it, the sooner we will be able to confirm further extensions for any team members needed to do the work beyond what is noted in #2 above.

a. Additional activities: At the moment TASC activities that are not specifically budgeted under a grant are being funded by the **[Donor E]** gift. This includes some travel, events, conferences, staff retreats, etc. As part of the plan requested above for the use of the **[Donor E]** gift, school leadership will need an outline of those activities between now and June 2024. We recognize that it is hard to fully plan for this now, but placeholders that we can all use as guideposts would be helpful (e.g. 3 staff attend 3 conferences with intended purpose at rough cost of \$1500 per person conference; 1 staff retreat per quarter at \$2500 per retreat). You provided some helpful information about events and conferences in your 1/31 proposal; can you clarify which of those activities are funded by gift or grant and which are hosted by TASC (vs. attended by TASC)? Any gathering that TASC plans to hold at HKS/Harvard that is not already encompassed by your grants should be specifically described.

4. Expense guidelines: as a reminder, as with any program and activity at HKS, TASC program expenses and spending should be consistent with University guidance, including what is deemed as "usual and customary" for a non-profit institution with a fiduciary responsibility to its funders. **[SHORENSTEIN FINANCE DIRECTOR]**, the Shorenstein Center's Director of Finance and Administration, in consultation with the Office of Financial Services, is accountable for overseeing the proper approval of expenditures. You can reach out to **[SHORENSTEIN FINANCE DIRECTOR]** with any questions regarding spending guidance or approval processes.

5. Intellectual Property: Once we have a greater clarity and as part of the wind-down process, we will also need to sort out the IP issues. As we have discussed, all the IP produced by TASC is owned by Harvard under the university policies, in part so that the University can meet its licensing obligations specified in various grant agreements.

Lastly, if at any time between now and June 2024, you have an opportunity to move the TASC program to another institution, please let us know as soon as possible, and we will do all we can to facilitate a smooth transition, including discussing the issues stemming from Harvard's ownership of TASC IP, so that the work may continue with minimal disruption.

Once you have had a chance to review this, we would like to coordinate with you on making the appropriate term extensions for your team.

Best,
Nancy

198. I responded with the same questions I asked HR:

Hello all,

I have received this email and have some outstanding questions with my own contract and other issues. Adding Pam here who wrote me yesterday.

1. My contract with Harvard goes through Dec 31, 2024. Am I getting severance for being asked to leave in June 2024?
2. Will you return gift funds to [Donor E] because I am not allowed to use the funds for intended outputs, like conferences and a podcast?
3. Can I see a full accounting of our budgets and spend down according to your plan? I am not sure we will be spending all the funding down accordingly as the exit strategy I submitted showed a large overage if we do not make some additional hires.
4. What IP do you have in mind that is retained by Harvard? I saw in your press releases a claim that the tech lab will keep the fb archive, but that was never discussed with me and Latanya. I am a partner on that project despite how it was framed in the media. I don't think it's fair that you told the media the project will continue without interruption as my team plays a large role in the workshops once the tech platform is finished. News leaders funding ends in Dec 31, 2023. I will inform [Donor F] of the departure.

5. Most importantly, my team is being held in a very precarious position with these small incremental contract extensions. If there is money in the budget to give them proper contracts, why do it this way?

It seems to me that the point is to hasten their departure more quickly. It is creating a hostile work environment for you to say in the press their is funding til June 2024 and then provide contracts in 3-4 month increments for the TASC team. These are human beings with families and medical issues that need assurances from their employer.

-joan

199. To this day, I have not been given a comprehensive and detailed accounting of TASC's expenditures from The Shorenstein Center, despite repeated asks over the years.

200. Discussions with HKS leadership continued via email for the remainder of my time at the University. I believed that the school would be more accountable if we kept most of the interactions written, but I was wrong on that front. I wrote another follow up email on 03/03/2023 to Ms. Gibbs, Dean Elmendorf, Ms. Wald, [NAME REDACTED], and Ms. Cozza (HKS HR) and [NAME REDACTED] (The HKS Executive Dean):

I have a question about this too: "Do you still intend to finalize the [Donor C] grant supplement project for \$150K, in which case the specific scope of work and budget needs to be submitted to RAO/ADO for internal review and approval prior to OSP accepting the funds." I just talked to [Donor C] who said this grant is already in Harvard's account. I believe [SHORENSTEIN FINANCE DIRECTOR] also said this had been finalized. This grant ends in June 2023. I have 2 students working on this research already and it should be reflected in the ledger. I am worried that these modifications to the exit plan are going to leave me with a major overage.

201. [ASSOCIATE DEAN'S NAME REDACTED] responded the same day:

Thanks Joan.

I can take this one. It is true that the amendment (the paperwork) from [Donor C] to fund a \$150K supplement to the existing award is in OSP's hands. The funds have not yet been sent over. Before the funds can flow, OSP must co-sign the amendment and return it to the foundation. We are close to being able to do so.

I checked and apparently there is some minor work still to be done to complete the required internal statement of work, budget and budget justification for the supplement.

I understand that [REDACTED NAME OF SHORENSTEIN FINANCE MANAGER], working with [REDACTED NAME OF HKS GRANTS MANAGER] can quickly complete what we need for ADO review and approval in GMAS, which would then signal to OSP to sign and return the amendment to [Donor C] and [Donor B] presumably would then fund the supplement for the project period thru 6/30/23.

Let me know if any other questions on this score.

202. I suspected that HKS was slowing down my grants and now I had proof that they were obstructing funding. I was told by the Finance Manager that the grant was good to go and had been processed back in January. To the contrary, I was told on 03/06/2023 by ShoreNSTEIN's finance manager that it was indeed not finished.
203. I was nervous that I would not have the staff to complete the projects under contract. On 03/14/2023, Ms. Gibbs responded to the group of me, Ms. Manley, Ms. Wald, [ASSOCIATE DEAN'S NAME REDACTED], and Ms. Cozza (HKS HR) and [NAME REDACTED] (The HKS Executive Dean):

Hi Joan,

Hope all your SXSW events went really well and you enjoyed 90 degree Austin—that was a very nice break from Boston.

I wanted to touch base about references you've made in emails about contacting [Donor F] about the future of News Leaders. I completely understand your point about the program needing to have the staff in order to operate.

But we want to be sure there is no misunderstanding here or at [Donor F], so it's important that you not tell [Donor F] that we will not be able to fulfill the terms of the grant or that the program is ending.

As with all sponsored research, consistent across academia, the grant is formally awarded to the President and Fellows of Harvard College (the University), not to any specific individual.

The University has every intention of fulfilling the terms of the contract and will discuss with [Donor F] in the event there are changes in personnel or approach.

Best wishes,
Nancy

204. I replied to Ms. Gibbs and the group:

Hi Nancy,

Can someone please follow up on the last questions I asked?

This is not the approach you've taken with the [Donor B] public interest internet grant that is currently failing to meet the conference objective listed in the narrative. So, I don't understand the difference?

I am the one losing staff and still must deliver the programming. If the TASC team is on short term contracts, I must be clear with all funders of these risks, especially after the statements made by you to the media that TASC has funding to run until June 2024.

I am on contract until Dec 31, 2024 and the 90% of the team expires in June. That confused a lot of people internally and externally. [Donor F] reached out to me after reading that and I informed them that I would contact you about the plan for staffing, which I did.

As for [Donor F], I am the PI on the news leaders grant. For 2.5 years, I negotiated the terms, delivered, and oversaw all the curriculum. It is specifically a program to educate news leaders about TASC research on media manipulation and the internet. That is what is in the grant narrative. Without my team, I can't deliver it.

It may look easy, but we have kept up with biweekly team meetings, 1:1 sessions with news executives, and completed over a dozen 4 hour long newsroom trainings with 5 more lined up. This isn't a blanket grant for an executive grant.

I remember on August 24th, less than an hour after Dean Elmendorf told me that he intended to end the TASC team, you asked me if I would consider leaving news leaders behind. If there is some intent to retain this IP by you or Shorestein, you should be clear about that now.

Matt, after having a conversations with [Donor C] and [Donor H], they both have decided to stop payment on their grants, so there is no need for OSP to sign the contract with [Donor C] . Forgive me for believing it was filed already. [Donor C] was not aware it was still open either. Glad to have that sorted out now.

Best,
Joan

205. Nancy then sent a longer email on 03/16/2023 to the group:

Joan,

Thanks for this, as it helps us be more clear; this guidance about communicating with funders applies to ALL grants. I mentioned [Donor F] because you had referred to telling them about a program ending; but the guidance applies to any and all grants.

Independent of our internal HKS discussions about staffing or winddown plans, you should not be telling funders that Harvard will be unable to fulfill a grant or that they should suspend payments.

If there needs to be any rebudgeting, revision of terms or changes in personnel or timing, that needs to be handled formally and in coordination with RAO.

On News Leaders specifically, I've been told that we can extend [TWO NAMES REDACTED] through December 31, 2023 as that is the timetable for the [Donor F] grant and it is clear what they will be doing. In the case of other staff, as requested in my note of 3/2, the school is waiting to hear from you more specifically about what research they will be doing after the current grants conclude, the timeframe needed for completing the work, and with what funding.

As for "leaving News Leaders behind" or Harvard "retaining" IP: this is not an issue, because Harvard already owns all the IP, as previously communicated. Convening news leaders has always been part of the center's activities and likely always will be; what form that takes in future years and what topics might be addressed will be a decision for future faculty to make.

The only thing that "ends" on Dec. 31, 2023 is this specific [Donor F] grant for the specific workshops you proposed and are leading.

[NAME REDACTED] has been or will soon be in touch separately about addressing any communication with [Donor H], [Donor C] or any other funder, which, again, needs to be done formally, in writing and in coordination with RAO.

Best,
Nancy

206. This response from Ms. Gibbs brought me to tears. Finally, it was out in the open that they intended to get rid of me, but keep my lucrative programs. It's at this point, I realized I was living through the parable of the golden goose, where I was treated well when I was raising funds, but later being actively gutted by those I had come to trust. At this point, I realized I needed to get some advice on IP, so I reached out to colleagues at Harvard Law School and

friends who understood more about the issue. They suggested that I get HKS to name what it was they intended to keep or take action on if I were to continue elsewhere.

207. On 03/17/2023, I politely replied to Ms. Gibbs email:

Hi Nancy,

In order to answer your questions about who is on which project and for how long and with what funding, I need you to answer the questions I responded with.

What you're asking me to do is shut down specific projects and lose staff ahead of June 2024, correct?

Most of the team works primarily on casebook with the exception of [NAMES REDACTED] who are on specific research about infrastructure hacking and platform accountability.

I am following all policies about grants and communication with funders set forth in the employee guidelines. I do not talk about anything other than my own engagement and my capacity to plan and deliver on grants. I make no statements about Harvard's intentions or ability to deliver on grants.

If you believe I am in violation of a policy, please clearly state which one and link me to it. I am duty bound to tell the truth to foundations when asked questions about my own ability to deliver on research and educational programs.

It is their decision whether they take action or not. I can tell you that funders do speak to one another frequently and they have formed their own opinions and ideas about Shorestein. The fact of the matter is funders were spooked by the statements HKS made to the media about the TASC ending.

For many, this was the first they heard about tumultuous relations. Neither you, RAO, or HKS press office let donors, funders, or the board know about your intended press statements (and despite telling me that you would not make a statement to the media), you and HKS freely spoke to reporters, who then called funders to verify your statements. That put lots of risk in the hands of the program officers at foundations, who were contacted repeatedly by [REPORTER NAMED]/ *Semafor* and the *Washington Post*, the *Crimson*, as well as a number of right wing publications.

Funders also witnessed the hate, harassment, and death threats levied against me and saw you and HKS do nothing to stem the onslaught. I kept track of the harassment for the first week, see here: [GOOGLE DRIVE LINK REDACTED]

Just as an FYI, Newsleaders requires significantly more staffing than what you're allowing for. To be competitive, I need much more than [NAMES REDACTED] to fulfill the proposal. [NAME REDACTED] has been on the project from the beginning, but has been getting most of his salary from [Donor H]. When we had to lose [NAME REDACTED] (full employment on the [Donor F] grant), I brought in [NAME REDACTED] to fill the content gaps. [NAME REDACTED] also spends significant time providing support to cohort members. Neither you or the school asked about staffing it before deciding who you would retain and who you wouldn't. I have asked [NAME REDACTED] to reallocate funds on this grant to more accurately reflect the current staffing and ensure it's spent down in accordance with the grant end date on 10/14/2023.

I will speak with [Donor F] about how to draw my portion of the work to a close properly. I have no interest in under-delivering a project that I conceptualized, staffed, managed, and delivered. I know you and Harvard will take whatever you think you own by rite of employment contracts. I have asked other questions about "the IP" and I have yet to hear back about what that means in practice.

Are you willing to return funding to [Donor E] since I am not allowed to meet the intentions set forth in the gift terms?

Best,
Joan

208. On 03/18/2023, I decided to send one more plea to get some answers.

Hi all,

I'm trying to get answers about what it is that Harvard intends to take any action on if I or others on the team were to continue research and education programs in another place. The vagueness about IP ownership seems rather ominous without describing what is the IP and for whom does this apply?

As well, is there an employee policy about funder discussions related to transparency that I should read? I have asked a few different times about resolving any outstanding IP problems. I don't know what to do here since Nancy's answer was not helpful.

In fact, I found it chilling.

This "wind down" process continues to be unnecessarily secretive, cruel, and vindictive. What I learned from [NAME REDACTED] is that it's critical to stand up for oneself

when people in power will try to put you down, minimize your contribution, and silence you. What was communicated to me is that there needs to be a discussion about IP. I'm trying to figure out what that entails.

What I find grossly anti-academic is that I would be left here to be fearful of a lawsuit regarding my own research and educational programs. The TASC team strives to publish publicly so that everyone can access our research, articles, videos, etc. If the school intends to continue programs I named, designed, implemented, and delivered, than say so.

Just to be clear, what I hear is Nancy saying is Harvard owns 'all the IP' and that future faculty will decide the content of programs I started, like news leaders, but what else?

Like every cog, I am replaceable, but I have enough confidence to know that what I contribute as a scholar is of unique value, both financially and intellectually. In academia, we have a word for taking someone's work and calling it your own. Maybe I'm too old school, but I believe It's important to stand on the merits of these ideals, where academic exchange is about citing the contributions of those who came before us and respecting the integrity of their work. Any news leaders program produced by Shorenstein without TASC is just plagiarism as far as I'm concerned.

As a social science scholars, we make our careers on non-commercial endeavors, like creating concepts and methods for the public interest. I don't own any texts, software, technology, patents, data, or inventions that would qualify any significant trademark, copyright, or commercial value.

So, what IP is Harvard interested in retaining? Everything I have published (aside from the book which we settled), is either Creative Commons, open access, or in academic journals. Who else on the TASC team does this apply to and for what kinds of IP?

For example, we have a medium page that archived our series of "Big, If True" discussions and a YouTube channel too. Who wants that?

For transparency's sake, has Shorenstein received any donations for the current news leaders program? If no funding has been raised for news leaders, then why am I being forbidden from discussing with [Donor F] the grant that I am the PI on? If funding has been raised for News Leaders, why was the team delivering the project not made aware?

Sarah, for my own knowledge because I am confused, what about News Leaders is IP? Since it's an educational program, is it the name "News leaders?" It is also the name of a non-profit and was suggested by [Donor F], The proposal? The lecture slides? Course readings? The list of cohort members? The course material? The website? The notes? All of it? The actual end date of the grant is 12/15/2023, the narrative proposal says 10/14/2023, please forgive the wrong date in the previous email.

Nothing about this is trademarked or copyright. Underneath this IP discussion is the possibility of a lawsuit if I make a mistake here. It's an insidious tactic to try to make our team fearful of legal trouble.

We are all losing our jobs, but also being told our work will be carried on by replacements. That's just cruel.

Legal discussions are very intimidating. I'm trying to be as non-litigious as possible, but I'm not getting any answers for questions I asked weeks ago. I am being isolated from critical decision-making about my staff and programs. I'm asking for guidance so that I avoid HR violations.

As I have told Pam, I am very worried about being fired and am adhering to restrictions even as the school does not protect my privacy or that of my team in the press.

As an employee, I should not have to struggle this hard for clarity or have to ask law school colleagues for advice on what has TASC produced that is considered Harvard IP. We have covered an immense amount of ground as a research team and are considered field-leading experts. Much of our work is already in the public domain.

Does Harvard mean to imply that we can not continue our research and education outside of Harvard? This is what Nancy's statement suggests.

Ethically, this IP posturing is anti-intellectual and, in my opinion, is another attempt to get me or team members to resign. To reiterate, there is no way to deliver news leaders with only me, [2 NAMES REDACTED] on staff. Any future iterations of the programs are not my concern or problem, other than the next version potentially tarnishing our outstanding reputation for excellence.

I did speak to Latanya and she told me that she retains all of the IP for Facebook archive. This is good news as FB Archive and platform accountability will be a focus of fall research papers and workshops. What kinds of IP should I be concerned about here?

As for casebook, it's creative commons licensing that allows non-commercial remix and reproduction with attribution of all content, images, and design. The casebook layout is inspired by the Council on Foreign Relations' cybersecurity incident tracker.

Is Harvard planning to keep Casebook? Or is there a statement that can be put on the page about the project history beginning at Harvard, like Latanya does with her work? Please advise.

If Harvard does plan on keeping Casebook, all of the contracts related to infrastructure are already in the possession of Shorenstein staff. It's a complicated web design, so we will need to train someone on the backend.

The last thing I'll say about IP and academia is that there seems to be two ways to have IP. On the one hand, you can be the person with the skills, knowledge, and creativity to design and deliver research and educational projects consistently that advance science and raise public awareness on key problems facing society. On the other hand, there's enclosure through one-sided contracts and institutional seizure.

I worked here for years without anyone ever uttering the phrase IP to me or anyone on my team, but now what I see is an institution in crisis and searching for relevance by taking other people's work/resources and calling it their achievement.

The proper role of a university is to share the light with the world.

As I leave Harvard, I am humbled by witnessing the betrayal of this crucial principle. What makes TASC's work so exciting and pathbreaking is the dynamic intellect we bring to the center's activities as a group. Building that galvanizing culture of INDEPENDENT inquiry is what I'm most proud to have contributed during my time at Harvard. That can't be captured in IP.

On communication with funders:

I approached Nancy first about the difficulty delivering the News leaders program without having staff on contract. To be clear, I have never met with the new program officer at [Donor F] about this project and 3/27 will be our first time speaking. I don't know what they intend to do as a granting agency given the negative press attention to the TASC project. We ALL took a big loss on that.

It's going to take me years recuperate my own reputation as being someone who didn't understand the risks of doing this kind of publicly minded research at a place like HKS without tenure. I should have known I needed the basic protections of academia, but I was naive in believing we all served the same mission.

When Dean Elmendorf said I don't have academic freedom, what it implied is that the institution wouldn't protect us if there were issues with corporations, politicians, etc. But, I digress. Like I said in a previous email, it is not a good idea to book a new cohort for news leaders in the fall unless there are staff contracted to deliver it. That's just common sense.

I believe that funders should be made aware of the risks facing TASC projects, especially after such an awful press cycle. You all should be as concerned about completing the [Donor B] grant as you are with this [Donor F] one.

You told the media there was funding through June 2024, so not finishing 2023 deliverables seems foolish. Of course, our motives may be different, the goal should be the same: to meet the objectives of the TASC project with high quality, rigorous, and scientific output.

To be clear, everyone on the TASC team is deeply distressed about their contracts. For newsleaders to run, we need [SIX NAMES REDACTED] at minimum. Much of the specific research and case studies are run through the rest of the research team for fact-checking and editorial.

By the end of September, tasc will be significantly gutted and I am merely trying to let you know that we can not deliver the same programming with 1/4 the staff. Dismantling the most diverse and impactful research team at the Kennedy School means that the projects Shorenstein wants to continue doing will suffer as our team-based research is what drives News Leaders.

I know you all have not said this, but I am inferring from your silence on the exit plan that I am not going to be allowed to hire or replace anyone that departs before June 2024.

It's such a toxic environment.

I do not want to be the subject of any more scrutiny or harassment as it is making me physically ill. My team and I need safety to do this work and having our information plastered in the press is horrible.

When you say that all "official" communication must happen through RAO, can anyone provide clear instruction on what that means? Is it sufficient to cc [HKS STAFF NAME REDACTED]? Do others want to join meetings? As of now, I have to schedule a follow up with [Donor B] to update on the public interest internet

conference (still waiting on the go ahead to plan this for Spring) and [Donor F] to meet the new program officer (scheduled for 3/27 at 3pm). Does someone else want to attend?

Lastly, since there's going to be a serious overage of [Donor E]'s donation by the close of this year, will Harvard return the funding because the restrictions placed on me by Shorenstein and the Dean are in direct contradiction with the gift agreement?

If so, let's discuss what it means to end this excruciating situation.

To reiterate, I will not cower to threats against IP. You must define what you are claiming as Harvard's work. If Shorenstein does choose to continue programs I created, be warned it's not as easy as we make it look.

In fact, my advice is that it'd be smarter to start fresh so you're not competing with such a high-profile and successful former program.

Take it from me, imposter syndrome can be really difficult to overcome.

I will not allow intimidation in the press to stop me from doing these critical research and educational programs.

HKS can leak all it wants, but I will maintain my dignity and privacy through this ordeal.

TASC staff are being purposefully driven into employment precarity through strategically short contracts. I did not advise that.

Let's do better.

Sincerely,

209. On 3/23/2023, I sent an email to the Research Administration Office, including [ASSOCIATE DEAN'S NAME REDACTED] and another grant manager for Shorenstein. I was confused as to why no one cared that we were going to miss a grant deliverable for [Donor B]. I saw the hypocrisy as Ms. Gibbs wanted to continue to host the Newsleader convening with nearly 60 attendees, but was completely stonewalling any attempt to move forward with a convening of academics on the topic of a Public Interest Internet. Despite the fact that we had limited the guest list to 30 people, I could not get anyone to approve this small convening or the TASC exit plan. I wrote to the administrators:

I am going to go through the grant agreements to establish in concrete terms what is left to deliver on grants. I am also very concerned about the **[Donor B]** grant about the public interest internet that has about \$180K in funding to spend down. In December, I was forbidden by the Dean from hosting conferences with more than 30 people, but I also have not been given the go ahead to do an event with 30 people explicitly.

The Dean's restrictions placed on me and the TASC team are preventing Harvard from meeting contractual obligations.

I will not be complicit in what amounts to a cover up of wasted funding.

In December 2022, we had the entire agenda for this conference set to go and I was blocked from sending out invitations. I can't believe I have to fight this hard to deliver the work we are obligated to do. The Dean said his reasoning was that he did not want to 'increase' my 'public profile,' but I don't see how a conference with 100 other professionals/academics does anything more than complete our stated goal and promote academic inquiry about technology.

The Berkman Klein Center and Jonathan Zittrain would like to host this conference for TASC because they see its field-wide value. In this way, attention would be directed towards them and not me, my team, or Shorenstein, if attention to TASC is the main reason why it was canceled by Dean Elmendorf.

In the **[Donor B]** proposal, we make several references to convenings as a deliverable. I can not get anyone to give me the go ahead to do this work and the grant closes in June. I do not want to have to tell **[Donor B]** that I am being blocked from finishing this deliverable, but I seem to be the only one concerned with this. Numerous queries into this issue have gone unanswered for months.

I knew something was amiss when the News Leaders event was given the green light and there is NO stated deliverable for an all cohort wide gathering (50 people) in year 2 for the **[Donor F]** grant. Instead, that project was allowed to go on because Nancy wants to continue my program after the TASC team is terminated.

What are the repercussions of not delivering on this grant, when I have been blocked since June 2022 from carrying out this project with the correct staff? At what point must we let **[Donor B]** know that Harvard has prevented the completion of the project despite there being funding to carry out a high quality convening? Is it your job to tell **[Donor B]** this?

We were denied by the Dean's office from hiring an events coordinator in June, we could not have a podcast on internet policy in July, and now this conference was blocked in December. I can't keep going back to the program officer with these negative updates.

Currently, I am being intentionally understaffed, so it's not long before we do not have the administrative or research staff in place to deliver it anyway. I believe in this regard that if you're not going to let the conference happen, the funding should be returned to **[Donor B]**.

From the **[Donor B]** grant narrative:

***LONG TERM GOAL:** While research on internet infrastructure has made important gains over the last decade (mostly technological), this initiative will convene academics, technologists, and policymakers to research and discuss policy options on public interest obligations for information technologies.

***MEDIUM TERM OUTCOMES:**

1. Conceptualize, define, and outline the goals of a public interest internet, so that the field can develop and debate a shared vision for protecting human rights in digital environments. We will do this by hiring a post-doctoral student to continue their research on internet infrastructure and technology policymaking, which will diagnose core problems brought about by the current design of the internet and social media platforms.
2. Generate new policy ideas about the internet's tech stack to build knowledge among key decision-makers through research and education. We will do this by convening industry, government, academic and civil society experts to discuss policy ideas on information, technology, and democracy grounded in empirical research.
3. Research the actors, behaviors, content, and design of social media products and the degree to which these contribute to spreading misinformation-at-scale in order to create new case studies for the TASC team's Media Manipulation Casebook (<https://mediamanipulation.org>).
4. Create an expert network through (virtual and in-person) convenings that combine policy and technology approaches to creating a public interest internet. We will do this by bringing together civil society, academics and policymakers around shared concerns related to internet infrastructure, rights, equity, and

justice, to formulate concrete responses, exchange knowledge, ideas and build novel networks of people and technologies in the public's interest.

From the Budget narrative:

We have not allocated the grant amount equally over the term of the grant because \$400,000 is specifically for the Public Interest Internet Initiative and \$300,000 is for core support for the TaSC team. The conference and its associated travel and personnel costs, which are large expenses, are primarily allocated in year two.

Sincerely,
Joan Donovan, PhD

210. At this point, I was utterly exhausted by the back and forth. It felt like it was never ending and no one was willing to make a decision for fear of Dean Elmendorf becoming upset. HR came back to the table to discuss contract extensions from June 30, 2023 to August 31, 2023 or December 31, 2023. After numerous meetings where I advocated for full extensions of the entire team through June 2024, except for those cases where people wanted to leave on 8/31/2023 because they were going to school or starting a new job. On 04/03/2023, HR informed me that they were only willing to extend a few members of staff from 06/30/2023 to 08/31/2023 and others whose contracts expired in September and October 2023 would be decided upon in the summer. Employees were only notified of the contract extension on 04/24/2023.

211. I sent this email on 04/03/2023 to HR to advocate for my team:

Thank you,

Just to flag, the people you have suggested we revisit in the summer are both women of color. Given the statements made to the media by the school, the extensions of the entire team except for these two women seems an awful precedent at this stage.

[NAMES REDACTED] were just brought on last year. As well, why only put [NAME REDACTED] on until August 31? He has been re-budgeted to be on newsleaders until the conclusion of that program. He also has participated in the program since its inception.

Again, I view the precarity forced on the TASC team as an impediment to doing our work. Do I have any rights as a PI about how this funding is spent down?

We have millions in funding, so these contract negotiations are extremely one-sided. In particular, statements made to the media about having funding to run until June 2024 left much of the team believing they would get appropriate and fair contracts.

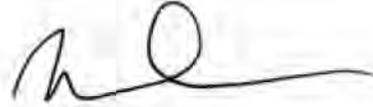
I am trying to advocate for the entire group here and I don't know what else to do at this point.

Best,
Joan

212. This plea to extend the contracts of three employees went nowhere. It is typical within universities for scholars to be on contract for one or two years, while they do their research and move on at the conclusion of their contract. I had previously worked at UCLA for two years on soft money, a term used for grant-funded research, and was able to move onto another job seamlessly. This is what I wanted for my team. After the fateful meeting with Dean Elmendorf on 8/24/2022, I expected to be able to run my research normally and that we would all leave according to the June 2024 timeline, even though I was on contract until 12/31/2024. This would ensure a smooth transition for me and my team into other jobs with a feeling of pride and accomplishment.
213. Instead, these short-term contract negotiations produced a lot of friction and when coupled with the IP issues, harassment by Ms. Manley, and Ms. Gibbs' allegations that I had violated numerous rules without any specificity, the entire TASC team, but especially myself, were spiraling. I was hospitalized three times between January – May for high potassium, which is my body's immune response to anxiety and stress. I was prescribed medication to alleviate anxiety and it seems to have controlled this issue. Unfortunately, the pummeling of the TASC team did not stop.
214. Ultimately by correspondence dated July 13, 2023, the Kennedy School informed me that they are ending the TASC program and my employment on August 31, 2023, and that my role as Research Director for the Shorenstein Center is being eliminated.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 28, 2023

A handwritten signature in black ink, appearing to read 'Joan Donovan', written above a horizontal line.

Joan Donovan

Exhibit “4”

Annual Review

Joan Donovan

Manager: Laura Manley

Period: 08/01/2018 - 07/31/2019

Goals

Goals Summary

Manager Comments:

Employee Comments:

Mid-Year

Mid-Year Summary

Manager Comments:

Employee Comments:

Competencies (Optional)

Feedback from Reviewers (Optional)

Context and Impact of Work

Opportunities for Improvement

Demonstration of Team/Org values

Overall Summary

Rating: Full/Consistent Impact

Manager Comments:

Joan has brought her remarkable talents, intellect and program to our Center. She is a brilliant unique leader who is building a foundation of work that is having meaningful impact in our country and our world. She has a keen eye for talent and I look forward to working with her to build her project at our Center..

Employee Comments:

Employee Comments

Employee Comments:

Annual Review

Joan Donovan

Manager: Laura Manley

Period: 08/01/2019 - 07/31/2020

Goals

Goals Summary

Manager Comments:

Employee Comments:

My goals for the next year is to hire administrative support so we can carry out more robust programming, work more closely on the communications so that our research is publicized, and to keep my team healthy.

Mid-Year

Mid-Year Summary

Manager Comments:

Employee Comments:

Competencies (Optional)

Feedback from Reviewers (Optional)

Context and Impact of Work

Opportunities for Improvement

Demonstration of Team/Org values

Overall Summary

Rating: Not Applicable - No Rating

Manager Comments:

Joan has done an outstanding job as the Director of TaSc and Shorenstein Research Director. Her critical work is having tremendous impact and has lifted the prestige of the Shorenstein Center as well as Harvard Kennedy School. Joan's work as Research Director has improved and enhanced projects in the Center over the past year. Joan is a vital member of the senior leadership team adding strategic guidance when needed.

Employee Comments:

Employee Comments

Employee Comments:

Exhibit “5”

From: Joan Donovan [REDACTED]

To: [REDACTED]

Subject: Fwd: Revised offer

Date: Wed, 6 Mar 2019 07:20:31 -0500

Importance: Normal

----- Forwarded message -----

From: [REDACTED]

Date: Thu, Jul 26, 2018 at 8:30 PM

Subject: Revised offer

To: Joan Donovan [REDACTED]

CC: Warren, Setti David [REDACTED]

Joan –

Review below – let me know if this captures it. The major point of concern is the moving / signing bonus – I just don't know if that will work for Harvard, but we'll figure a solution out.

Title: Director, Technology and Social Change Research Project

Responsibilities would be organized around conducting and publishing research in technology and social change with a focus on developing a global case book project. This encyclopedia of case studies will act as a basic research repository on technology's role in movement building for the field of academics and researchers. Cases will be classified by technique, vectors/pathways of attack, targets, socio-technical vulnerabilities, and outcomes.

We estimate the salary for this position to be between [REDACTED] and [REDACTED]; salaries are set by the HR department for campus-wide equity. I will advocate for the high end of the spectrum.

The position would be a 3-year term with renewal subject to available grant funding.

The position includes all standard Harvard benefits – health insurance, retirement, etc. More at <http://hr.harvard.edu>

We will provide a relocation bonus. This is also set by HR but I will advocate for a [REDACTED] signing bonus to cover relocation.

You will have a dedicated office at the Center with a computer, telephone, and access to all Harvard libraries.

You will have a full time researcher; I understand your current researcher makes approximately [REDACTED] a year and you'd like to retain him/her.

You will have a part time graduate assistant, a Kennedy School graduate student.

Exhibit “6”



November 27, 2018

Joan Donovan
[REDACTED]

Dear Joan:

Welcome to the Harvard Kennedy School! You are joining a vibrant community of faculty, staff and students who are dedicated to the School's mission of training enlightened public leaders and generating the ideas that provide answers to the world's most challenging public problems.

I am pleased to confirm your acceptance of our offer of employment as Director, Technology and Social Change Research Project, Grade 59, with the Shorenstein Center, beginning on December 10, 2018. Your bi-weekly salary will be [REDACTED], which is equivalent to [REDACTED] per year. In addition, you will receive a one-time relocation bonus of [REDACTED], which will be included in your first paycheck. Also, you will receive a one-time sign on bonus of [REDACTED], payable after you have completed your 90 day orientation and review period. As a full-time exempt staff member, you accrue vacation time at the rate of 1 2/3 days per month of completed service. Sick pay is accrued at the rate of one day per month of completed service. You will be eligible for 3 personal days during the 2019 calendar. **This offer is contingent on successful completion of a background check.**

If possible, please come to our office ten business days prior to your start date to complete all necessary new hire paperwork. Please contact [REDACTED] Human Resources Coordinator, at [REDACTED] to schedule an appointment. You will need to provide documentation establishing your identity and employment eligibility at that meeting. Also enclosed is a copy of the Harvard University Sexual Harassment and Pregnancy at the Workplace Policies.

This position is a term-appointment beginning December 10, 2018, and scheduled to end December 9, 2019, contingent upon your work performance meeting the needs of the department and the continued availability of funding designed to support the position. In the event that the needs of the department should change, the length of this appointment may be changed. Due to the temporary nature of this position, you will not be entitled to severance pay or layoff benefits of any kind when your employment ends.

Please be aware that all administrative and professional staff are employed on an at-will basis, and Harvard reserves the right to terminate the employment relationship at any time. Nevertheless, the first 90 days of your employment are an orientation and review period (sometimes referred to as the probationary period), during which you and your supervisor should pay particular attention to the suitability of this placement. If within this period it appears that the placement is not suitable for any reason, either of you may terminate the employment relationship. You may begin to take vacation and personal days only after the probationary period is over.

During your first two weeks, you will attend the Harvard University orientation session, which will provide you with information on available benefit plans and a variety of other Harvard programs and services. A packet with information on Harvard's benefit plans will be mailed to your home. You must elect benefits coverage within 30 days of your start date. In addition, there will be a Harvard Kennedy School Orientation to introduce you to HKS resources, history and culture. We will let you know on or before your first day when these sessions will take place.

After we have completed processing your information into Harvard's personnel systems we will notify you when you are able to go in person to the Harvard University ID Services Office, 8th Floor of Smith Campus Center, to obtain your photo ID card. Your card entitles you to use of the Harvard libraries and Harvard Housing Office, admission to all Harvard museums, and discounted use of some Harvard athletic facilities. Once you have obtained a Harvard ID and HarvardKey, you may access Harvard's personnel policies and practices, fully described in the Harvard University Personnel Manual at: <http://hr.harvard.edu/staff-personnel-manual/introduction/university-employment-policy>.

Congratulations and welcome to the Kennedy School! Please do not hesitate to call me if you have any questions or if I can be of assistance in any way.

Sincerely,



Recruitment Consultant

cc: Setti Warren, 
Personnel File

Exhibit “7”

From: Amber Heffernan [REDACTED]

To: "Donovan, Joan M" [REDACTED]

Subject: Re: Facebook visit

Date: Sun, 15 Dec 2019 18:30:00 +0000

Importance: Normal

Hi Joan,

Let's definitely work around those dates. Shall we work towards scheduling something on February 10th? Happy to work out the details on our end to make sure that additional evening is covered.

In other news, I wanted to share confidentially that, at long last, our team is working toward a public announcement of a pilot launch of community review (though not publicly naming it as such). Per our most recent discussion, this initial launch will be focused on content prioritization for 3PFC. While we've answered a lot of open questions to get us to this point, we've also discovered new ones along the way and have come to a critical point in our analysis wherein experimenting with this program will provide us with the best answers for how to proceed.

Our *tentative* plan is to release this upcoming Tuesday, December 17th. Below is an overview of what we plan to announce.

Pilot Launch. *We will announce that, after a long exploration of how best to complement and streamline the work of our fact-checking program, we are starting to test a program in which diverse groups of people who use Facebook will identify journalistic sources that corroborate or contradict claims made in potentially false news. We will share details of the process our reviewers go through, in order to establish the differences between this work and the work of our fact-checking partners. One of our objectives is to be very clear that this program will be preceding to and in support of our fact-checking partners, providing them with a more precise signal to help them as they make decisions on how to prioritize the content they review and rate.*

Our plan is to pilot this process in the US over the coming months, closely evaluating different outcomes through our own research, research conducted externally, as well as feedback from our third-party fact-checking partners. Hopefully, this information will allow us to better understand how we might most effectively leverage this program or related ideas to help us to evaluate false content faster.

Ongoing Analysis. *We will also share that we've partnered with YouGov as a part of our commitment to provide oversight to this program and will replay a brief summary of the results of the analysis they've conducted to ensure that our pool of reviewers is representative of the diverse facebook community.*

Once again, thank you for your consultation on this project. I must reiterate that your time, input and suggestions have been invaluable. While this first launch may be a narrow exploration of this idea, your input has helped us see that the greatest potential of this idea may be in how we might leverage crowds in other meaningful ways to help us tackle this and other issues we confront on the platform.

Last but not least, let's make sure we connect in January about connecting more dots with the Shorenstein Center. One of my projects early next half is to start shaping different models for successful academic/research partnerships and want to get your thoughts. I think I may be out East again in mid-January so once I lock dates down, I'll let you know.

In the meantime, have a wonderful holiday!

Amber

--

Amber Heffernan | facebook

Strategic Initiatives
[REDACTED]

From: "Donovan, Joan M" [REDACTED]

Date: Friday, December 13, 2019 at 8:02 AM

To: Amber Heffernan [REDACTED]

Subject: Re: Facebook visit

Hi Amber,

I will be coming out to Foo Camp Feb 7-9, which is on FB campus. I haven't booked travel yet, so I could come a day early or stay a day late, if that works?

Best,

Joan

Joan Donovan, PhD

[Director of the Technology and Social Change Research Project](#)

Shorenstein Center on Media, Politics, and Public Policy at the Harvard Kennedy School

From: Amber Heffernan [REDACTED]

Date: Wednesday, December 11, 2019 at 3:52 PM

To: "Donovan, Joan M" [REDACTED]

Subject: Facebook visit

Hi Joan,

I've been chatting with some of our leads on both the misinfo and elections integrity teams to sort through some possible opportunities for you to come out to engage with the broader teams as well as more deeply with a few dedicated product managers and researchers. Wanted to check in with you on any plans you may already have to be out here or how flexible you may be with timing early next year?

Let me know when you have a chance and I'll circle back with the team to see if we can get something on the calendar.

Amber

--

Amber Heffernan | facebook

Strategic Initiatives
[REDACTED]

Exhibit “8”

From: "Gibbs, Nancy R." [REDACTED]

To: HKS-Shorenstein [REDACTED]

Subject: Something to celebrate

Date: Tue, 24 Mar 2020 15:16:56 +0000

Importance: Normal

Hi all,

As we adjust to our new reality and test our resilience in all kinds of ways, I'm delighted to announce an exciting promotion: In addition to her role leading TaSC, Joan Donovan becomes Shorenstein Center Research Director.

These last challenging weeks have confirmed the importance of the many roles Joan has been playing, publicly and privately. She is an invaluable resource to reporters all across the country who are struggling to make sense of this new information environment; her research is informing platform companies facing hard decisions about content moderation; and within the Center, she is a tireless partner as we all navigate uncertain terrain.

In addition to her own research work, Joan has quietly helped me, and many of you, in solving problems (and avoiding them in the first place!) and is unfailingly generous with her time and guidance. Particularly as we build even more bridges between theory and practice, and work to get the best research into the hands of reporters, private companies, policymakers and civil society leaders, Joan's deep relationships across ALL these arenas is a unique resource for our work going forward.

Please join me in congratulating Joan on this well-deserved recognition

Nancy

--

Nancy Gibbs

Visiting Edward R. Murrow Professor of Practice
Director, Shorenstein Center on Media, Politics and Policy
Harvard Kennedy School



Exhibit “9”

From: [REDACTED] [A member of the Dean's Council]

To: "Donovan, Joan M" [REDACTED]

Subject: NOV 1 2021 - You are my Super Hero:)!!! - 6:55PM EST

Date: Mon, 1 Nov 2021 22:55:33 +0000

Importance: Normal

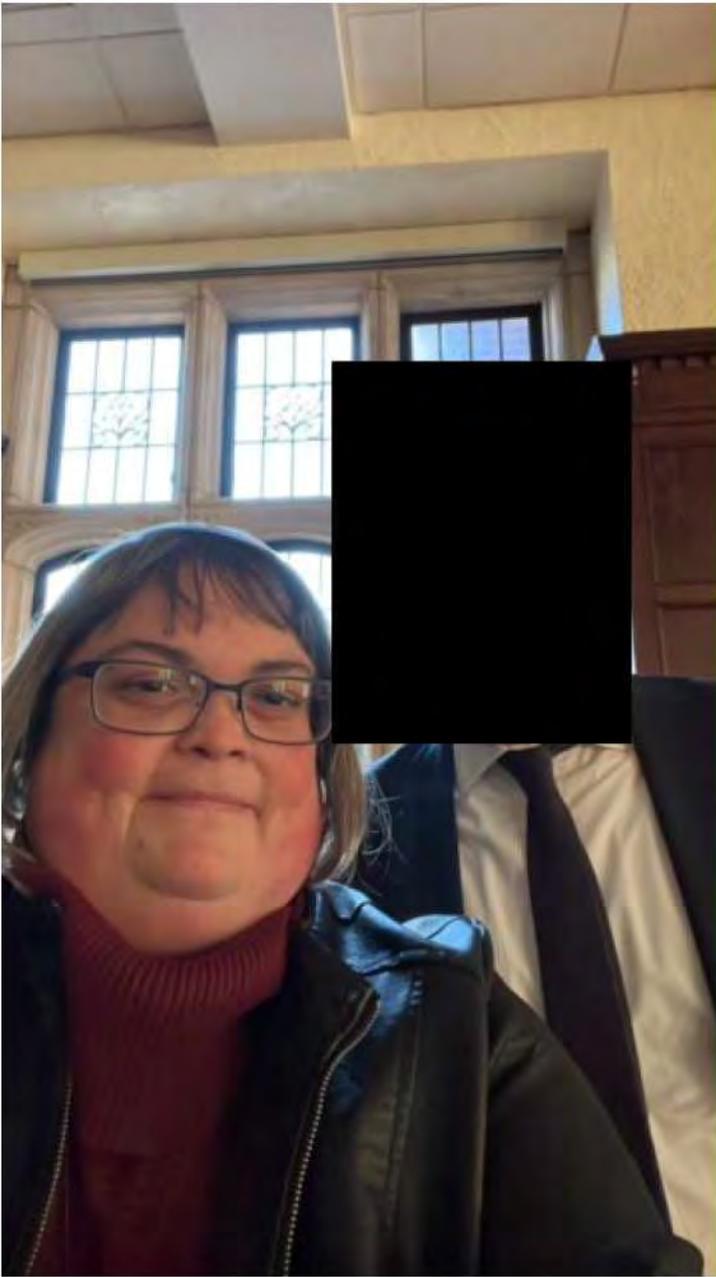
Inline-Images: Image-1.jpg

Dear Joan,

Just want to say what an amazing job you are doing - you DID a fab job on the Dean's Council last friday - I hope you enjoyed yourself and was not too ____by Elliot's question...WOULD love to have a facetime with you to catch up, let me know what is a good time...

you know I follow you on Twitter - thanks for always sharing good stuff! and THAT Halloween outfit - FAB.

#31143.1



Sent from my iPhone

Exhibit “10”

Oct 29, 2021, 6:15 PM

Should I be worried about the way schrage got mad at me?

I think we should have worried if he DIDNT get mad. [REDACTED] [A member of the Dean's Council] said everyone says it was great. And I think eliot's position is well known. That said— we could invite him to write something for us about why "it's more complicated" than the critics think....

Not interested in arguing with him. Just thought it was interesting that he raised his hand 15 mins into the chat. Fb laid off a ton of people and they are truly a scary company.

Oh yes. But it's much more out in the open now thank goodness.

But I thought you were just terrific. So sophisticated and fair in your thinking and analysis. Made me proud.

Thank you! We are a great team. I'm in Virginia for the weekend. Should be nice to hear away

I'm so glad you're getting away. Have a safe and peaceful trip. And savor all that you've accomplished these past weeks!

Exhibit “11”

some specific ends, be in political or profitable gain. We look for behaviors where individuals or groups have created fake accounts, or bought advertising, or have sought to wedge public issues in some underhanded way by hiding their identity, affiliations, or intentions. In this way, we do not generally speak about what is good or bad for a society, but rather what is true or false about a specific public event.

I believe there is a bit of a mix up with the Misinfo Review, which is [REDACTED]'s project. I do provide some mentorship to the post doc editor on the project, but I am not writing or vetting papers on that project. Largely, I try to help when needed.

I have been researching Facebook for over a decade. My speciality is Internet studies and I have several peer reviewed papers about the relationship between internet technology, social movements, and social change. I also have numerous papers and articles that involve studies of Facebook both directly, where I investigated how rumors of the efficacy of hydroxchloroquine spread early in the pandemic, and indirectly, where Facebook is one of several companies implicated in the circulation of dangerous misinformation. Here is a short paper that encapsulates how we do our research and the way it relates to more contemporary historical case studies <https://jods.mitpress.mit.edu/pub/2gnso48a/release/8>

Best,
Joan

Joan Donovan, PhD
Research Director
Harvard Kennedy's Shorenstein Center on Media, Politics and Public Policy

From: Elmendorf, Doug [REDACTED]
Sent: Monday, November 8, 2021 7:23 AM
To: Donovan, Joan M; Gibbs, Nancy R.
Subject: misinformation

Hello Joan and Nancy,

Your interesting discussion with the Dean's Council a few weeks ago reminded me that I haven't sat down and talked with you about this work in a while. I mentioned my interest to David, Suzanne, and Sarah, who were all eager to learn more themselves. Can the six of us meet sometime in the next few weeks?

Given the limited time we'll have and the complexity of the work you're doing, I think it'd be better *not* to try for an overview but instead to focus on a few key issues drawn from the questions raised by the Dean's Council and my own limited reading of current events. In particular, I'd love to hear more about:

- How you define and measure the problem of misinformation that shows how the current situation is different from (or similar to) misinformation in earlier eras?
- How you define the problem of misinformation for both analysis and possible responses (algorithm-adjusting or policy-making) when there is no independent arbiter of truth (in this country or others) and Constitutional protections of speech (in some countries)? I don't mean the mechanics, but the principles; for example, how could one decide when objections against vaccines are okay or not okay, when rejection of human-caused climate change is okay or not okay, etc.
- How the research you're conducting provides a basis for comments you're making about current events. I understand why Nancy started with the news about Facebook, but someone pointed out to me that very little that has appeared in the Misinformation Review seems to be about Facebook, which makes me wonder how the current state of research on misinformation does (or doesn't) overlap with interest on the outreach side.

Thanks,
Doug

Douglas W. Elmendorf
Dean and Don K. Price Professor of Public Policy
Harvard Kennedy School

[REDACTED]

He/him/his

Exhibit “12”

From: "Manley, Laura" [REDACTED]
To: "Sweeney, Latanya" [REDACTED], "Donovan, Joan M" [REDACTED], "Gibbs, Nancy R." [REDACTED]
Subject: Re: fbarchive.org
Date: Mon, 8 Nov 2021 18:03:19 +0000
Importance: Normal

Agreed!! We'll get through this ❤️

In the meantime, [REDACTED] and I are working on a doc that has updated info and a few quick questions for the website text to respond to questions below. It also includes a suggested comms strategy, updated FAQs and talking points. We'll send that along in the next few hours to keep this all going.

@Latanya - when are you hoping to have the landing page go live?

From: Sweeney, Latanya [REDACTED]
Sent: Monday, November 8, 2021 12:51 PM
To: Manley, Laura [REDACTED]; Donovan, Joan M [REDACTED]; [REDACTED], [REDACTED]; Gibbs, Nancy R. [REDACTED]
Subject: Re: fbarchive.org

P.S. I just want to send Joan and hug, and also to remind us all that this effort is only possible because of Joan.

--LS

From: "Sweeney, Latanya" [REDACTED]
Date: Monday, November 8, 2021 at 11:24 AM
To: "Manley, Laura" [REDACTED], "Donovan, Joan M" [REDACTED], [REDACTED], "Gibbs, Nancy R." [REDACTED]
Subject: Re: fbarchive.org

Hi,

Thanks for the heads up Joan. Here is what I suggest...

1. Let's remove the explicit listing of TaSC, minimally, or of all three groups, when the website updates later today. No reason to put a target on the project that allows FB to claim bias before we even do anything. Otherwise, we have to deal with their discrediting campaign before we can even launch. We can still include logos for the Tech Lab and the Data Privacy Lab. Doing so may reduce the heat. Just throwing this out as a possibility.
2. At the right time, we should invite Facebook to help annotate the documents and offer explanation. We realize that one document or a couple of images cannot convey the whole story, so we welcome Facebook to join the platform and provide tags and discussion to further understanding. If Facebook is concerned about "truth", and we certainly are, this seems a good opportunity for Facebook to clarify.

Joan, I am not sure what all the extra people and names mean, but that seems a conversation for our next meeting. Maybe we can spec out who is doing what and in which version at the meeting.

■■■■ had mentioned a group email that we all share. If we want a group email, we have to set it up independently of HKS. The schools, FAS and SEAS, for example, make bright lines between activities sponsored by research efforts and those sponsored by the schools themselves. FAS, for example, does not control a legitimate research effort, and in exchange, the research effort is not sponsored by the school. I am not sure how Shorenstein in this model. My view: Shorenstein has a legitimate and substantive role to play in the project as part of its research agenda, which is why the explicit inclusion. But that's just my opinion.

If folks want a shared email, we can use Google and hiver, for example. But the email should not have a ■■■■■ name. We can use Google and hiver or even AWS for *■■■■■ addresses. What do you think?

After Laura's edits, I think this is where we are with the content...

Note: Laura, used "primary" instead of "principal" goal because we may have other goals.

Note: used fbarchive.org as Laura suggested to keep the branding clear.

Note: included TaSC and Shorenstein unless you advise otherwise. Replaced "in" with "across"

Note: the research aims are more generalizable than the goals of the website, which is why they are listed separately. Let me know if there are any further or additional edits.

We have established the Facebook Archive (fbarchive.org) with two primary goals: (1) to provide researchers and journalists around the world with searchable, indexed access to curated versions of the internal Facebook documents; and (2) to encourage collaborative analysis of the documents to improve understanding.

fbarchive.org consists of images of documents taken by Francis Haugen, the whistleblower who disclosed tens of thousands of pages of internal Facebook research. Teams at Facebook used social science and data analytics to help the company's leadership understand adverse consequences from their decisions and technology designs. The documents provide a wealth of material for academic and journalistic study and a unique opportunity for collaborative investigation and understanding.

We have removed personal names and other sensitive content that appear in the images for privacy reasons. We are unable to share the raw material as we believe it would be irresponsible to release images without this type of redaction and curation.

fbarchive.org is a research project across the [Public Interest Tech Lab](#), [the Technology and Social Change Project](#), and [the Shorenstein Center](#) at Harvard University. Our research aims are to construct an innovative tool for collaborative investigation of image artifacts, to curate content about the images for improved understanding, and to measure and assess the de-identification of personal names found in images.

We welcome collaborators and participants.

—LS

Latanya Sweeney, Ph.D.
Daniel Paul Professor of the Practice of Government and Technology
Harvard Kennedy School
Harvard Faculty of Arts and Sciences
X.D. and Nancy Yang Faculty Dean of Currier House
Director, Public Interest Tech Lab (techlab.org)
Director, Data Privacy Lab (dataprivacylab.org)
Editor-in-Chief, Technology Science

Formerly: Chief Technology Officer, Federal Trade Commission
Commissioner, U.S. Commission on Evidence-Based Policymaking

Twitter: [REDACTED]
pronouns: she/her/hers

From: "Manley, Laura" [REDACTED]
Date: Monday, November 8, 2021 at 9:53 AM
To: "Donovan, Joan M" [REDACTED], [REDACTED],
"Sweeney, Latanya" <[REDACTED]>, "Gibbs, Nancy R." [REDACTED]
Subject: Re: fbarchive.org

Hi all,

Just a reminder that Latanya and I are going to meet with Sarah Wald tomorrow about this. Will keep everyone posted on how that goes because I'm sure Doug's concerns will be raised there too. Here are my last edits on the text for the "About" Tab:

We have established the Facebook Archive (fbarchive.org) *should this just be "We have established fbarchive.org with two goals" Do we want to be consistent about what we're calling it using the URL or are we calling it the "Facebook Archive"?* with two principal *(remove principal)* goals: (1) to provide researchers and journalists around the world with searchable, indexed access to curated versions of the internal Facebook documents; and (2) to encourage collaborative, editable content analysis of the documents to improve understanding *(I think we need to explain what we want to improve understanding of and to what ends. Is it "to improve understanding of the content and Facebook's role in mis/disinformation campaigns? Is it to better understand how tech companies play a role in our information ecosystem?)*

The Facebook Archive repository *(should we remove "repository" and just call it "fbarchive.org"?)* consists of images of documents taken by Francis Haugen, the whistleblower who disclosed tens of thousands of pages of internal Facebook research. Teams at Facebook used social science and data analytics to help the company's leadership understand adverse consequences from their decisions and technology designs. The documents provide a wealth of material for academic and journalistic study and a unique opportunity for collaborative investigation and understanding. *(rewrote this the start with the positive and be as direct as possible)* We have removed personal names and other sensitive content that appear in the images to protect individuals and their identities. We are unable to share the raw material as we believe it would be irresponsible to release images without this type of redaction and curation.

(updated the beginning of this sentence) fbarchive.org is a research project in the [Public Interest Tech Lab](#), [the Technology and Social Change Project](#), and [the Shorenstein Center](#) at Harvard University. Our research aims *(This is repetitive because we already have goals at the beginning. We could combine this up top or just remove)* are to construct an innovative tool for collaborative investigation of image artifacts, to curate content about the images for improved understanding, and to measure and assess the de-identification of personal names found in images.

We welcome collaborators and participants. *(Do we want to add a line about here saying more information about how to collaborate and participate is to come?)*

Lastly, I agree that we should have an inbox for this. Happy to talk any of this through.

Thanks,

Laura

From: Donovan, Joan M [REDACTED]
Sent: Monday, November 8, 2021 8:35 AM
To: [REDACTED]; Sweeney, Latanya [REDACTED]; Gibbs, Nancy R.
[REDACTED]; Manley, Laura [REDACTED]
Subject: Re: fbarchive.org

This all looks incredible to me!

Just a heads up, Nancy I got an email this morning from the Dean asking very specific questions about Facebook and how the research at TASC is conducted. At the deans council meeting Elliot Schrage was very angry with me and now the Dean wonders how we can assess misinformation when no one is "an arbiter of truth." So, they did go to the Dean after that council meeting. This is really going to bring the heat.

I am going to meet with [REDACTED] [REDACTED] from UW on Wednesday at 115pm about helping to clean the archive. I will also invite [REDACTED] [REDACTED] from UNC too. Anyone else I should include? It's a cursory meeting to see how many people we can assemble. I'll include y'all on the invite too.

Best,
Joan

Joan Donovan, PhD
Research Director
Harvard Kennedy's Shorenstein Center on Media, Politics and Public Policy

From: [REDACTED]
Sent: Sunday, November 7, 2021 7:31:43 PM
To: Sweeney, Latanya [REDACTED]; Gibbs, Nancy R. [REDACTED]; Manley, Laura [REDACTED]; Donovan, Joan M [REDACTED]
Subject: Re: fbarchive.org

Hi all,

This is so exciting! So is this what we're *hoping* to have on the About tab?:

We have established the Facebook Archive (fbarchive.org) with two principal goals: (1) to provide researchers and journalists around the world with searchable, indexed access to curated versions of the internal Facebook documents; and (2) to encourage **collaborative (insead of open?)** editable content analysis of the documents to improve understanding.

The Facebook Archive repository consists of images of documents taken by Francis Haugen, the whistleblower who disclosed tens of thousands of pages of internal Facebook research. Teams at Facebook used social science and data analytics to help the company's leadership understand adverse consequences from their decisions and technology designs. The documents provide a wealth of material for academic and journalistic study and a unique opportunity for collaborative investigation and understanding. We are unable to merely share the material without curation because of the appearance of personal names and other sensitive content that appear in the images. It would be irresponsible of us to share the images without proper redaction and curation.

Because the images cannot be shared widely "as is," fbarchive.org is a research project in the [Public Interest Tech Lab](#), [the Technology and Social Change Project](#), and [the Shorenstein Center](#) at Harvard. Our research aims are to construct an innovative tool for collaborative investigation of image artifacts, to curate content about the

images for improved understanding, and to measure and assess the de-identification of personal names found in images. We welcome collaborators and participants.

Is there an email we'd like to ask HKS to create so we can all have access to a shared mailbox? Maybe

Thanks so much to everyone for all of the work on this!

From: "Sweeney, Latanya"
Date: Sunday, November 7, 2021 at 10:21 AM
To: "Gibbs, Nancy R.", "Manley, Laura"
"Donovan, Joan M"
Subject: Re: fbarchive.org

Much better Nancy. Thank you!

Other should feel free to chime in, but, as for me...

I would replace "leaked" with "internal" (one of the options Nancy lists).

I would just not replace "editable content" and leave the sentence as Nancy has it.

--LS

From: "Gibbs, Nancy R."
Date: Sunday, November 7, 2021 at 10:08 AM
To: "Manley, Laura", "Sweeney, Latanya"
"Donovan, Joan M"
Subject: Re: fbarchive.org

Really proud of this work.

Just a couple edits/comments/questions, mainly in the interest of tightening and clarity:

We have established the Facebook Archive (fbarchive.org) with two principal goals: ~~The goal of fbarchive.org is to two-fold:~~ (1) to provide researchers, ~~students~~ (aren't students a subset of researchers?) and journalists, around the world, with searchable, indexed access to curated versions of the [do we need this word? Is there an alternative? Internal? leaked] Facebook documents; and, (2) to encourage open [better word? Editable by who, to what end? Shared?] ~~editable content~~ analysis of ~~about~~ the documents to improve understanding.

The Facebook Archive repository consists of images of documents taken by Francis Haugen, the whistleblower who disclosed tens of thousands of pages of internal Facebook research. ~~The documents are from~~ Teams at Facebook ~~that~~ used social science and data analytics to help the company's leadership understand adverse consequences from their decisions and technology designs. ~~As described,~~ The documents provide a wealth of material for academic and journalistic study and a unique opportunity for collaborative investigation and understanding. We are unable to merely share the material ~~publicly~~ without curation because of the appearance of personal names and other sensitive content that appear in the images. It would be irresponsible of us to share the images without proper redaction and curation.

#36153.5

Because the images cannot be shared widely “as is,” fbarchive.org is a research project. Our research aims are to construct an innovative tool for collaborative investigation of image artifacts, to curate content about ~~and related to~~ the images for improved understanding, and to measure and assess the de-identification of personal names found in images. We welcome collaborators and participants.

From: "Manley, Laura" [REDACTED]
Date: Sunday, November 7, 2021 at 8:45 AM
To: "Sweeney, Latanya" [REDACTED], "Donovan, Joan M" [REDACTED]
"O" [REDACTED]
Cc: "Gibbs, Nancy R." [REDACTED]
Subject: Re: fbarchive.org

Sent too soon.

Do we have a response to them about why we are using a Google form instead of one of their approved products?

From: Manley, Laura [REDACTED]
Sent: Sunday, November 7, 2021, 8:44 AM
To: Sweeney, Latanya; Donovan, Joan M; [REDACTED]
Cc: Gibbs, Nancy R.
Subject: Re: fbarchive.org

Thanks for sharing. Adding Nancy so she can weigh in.

Quick logistical question about the contact us page. I know HKS is very sensitive about using anything in the Google suite. Do we

From: Sweeney, Latanya [REDACTED]
Sent: Sunday, November 7, 2021, 5:23 AM
To: Manley, Laura; Donovan, Joan M; [REDACTED]
Subject: fbarchive.org

Hi,

The curtain website is taking form. It has an About tab whose current draft contents appear below (though not necessarily live at this time).

We want to change “is a research project”, to minimally “is a research project in the [Public Interest Tech Lab](#) at Harvard”, but ideally to “is a research project in the [Public Interest Tech Lab](#), [the Technology and Social Change Project](#), and [the Shorenstein Center](#) at Harvard.” Similarly, we would like to add the tasc and Shorenstein logos. Before we do that of course, we need your permissions. Let me know.

Also, check out the link at [Contact us](#). It is a form for others to complete. Responses will be shared with all on this email (and the project coordinator, once hired).

The goal of fbarchive.org is to two-fold: (1) to provide researchers, students and journalists, around the world, with searchable, indexed access to curated versions of the leaked Facebook documents; and, (2) to foster open, editable content about the documents to improve understanding. The documents are from teams at Facebook

that used social science and data analytics to help the company's leadership understand adverse consequences from their decisions and technology designs. As described, the documents provide a wealth of academic and journalistic study and a unique opportunity for collaborative investigation and understanding.

The fbarchive repository consists of images of documents taken by Francis Haugen, the whistleblower who disclosed tens of thousands of internal Facebook documents. We are unable to merely share the documents publicly without curation because of the appearance of personal names and other sensitive content that appear in the images. It would be irresponsible of us to share the images without proper redaction and curation.

Because the images cannot be shared widely “as is,” fbarchive.org is a research project. Our research aims are to construct an innovative tool for collaborative investigation of image artifacts, to curate content about and related to the images for improved understanding, and to measure and assess the de-identification of personal names found in images. We welcome collaborators and participants.

[Contact us](#)

<logos of the TechLab and the Dataprivacy Lab>

Let me know your thoughts.

—LS

Latanya Sweeney, Ph.D.
Daniel Paul Professor of the Practice of Government and Technology
Harvard Kennedy School
Harvard Faculty of Arts and Sciences
X.D. and Nancy Yang Faculty Dean of Currier House
Director, Public Interest Tech Lab (techlab.org)
Director, Data Privacy Lab (dataprivacylab.org)
Editor-in-Chief, Technology Science

Formerly: Chief Technology Officer, Federal Trade Commission
Commissioner, U.S. Commission on Evidence-Based Policymaking



Exhibit “13”

From: "Sweeney, Latanya" [REDACTED]

To: "Donovan, Joan M" [REDACTED]

Cc: "Gibbs, Nancy R." [REDACTED]

Subject: Way forward with Doug

Date: Thu, 20 Jan 2022 14:10:59 +0000

Importance: Normal

Hi Joan,

Nancy and I had a chance to talk with Doug as a follow-up to our last meeting. It is clear that Doug sees the value of you and your work.

We also talked about disciplines, validity and generalizability of findings and how you might bring that kind of scaffolding to your work on your Case Studies. The result would help you leap forward and improve the disposition of your work to academic ears.

Doug was very pragmatic and concrete in the discussion. How about the two of us meet and unpack it all? A good goal might be a kind of criteria statement for Case Studies that might be on the website to everyone to view and understand the mechanics and definitions behind the Case Studies. Just giving a vision here, but let's meet and talk and see what you think.

I'll ask [REDACTED] to contact [REDACTED] to find a time for us to devote to this. Maybe 2-3 meetings?

Let me know your thoughts about all this.

—LS

Latanya Sweeney, Ph.D.
Daniel Paul Professor of the Practice of Government and Technology
Harvard Kennedy School
Harvard Faculty of Arts and Sciences
X.D. and Nancy Yang Faculty Dean of Currier House
Director, Public Interest Tech Lab (techlab.org)
Director, Data Privacy Lab (dataprivacylab.org)
Editor-in-Chief, Technology Science

Formerly: Chief Technology Officer, Federal Trade Commission
Commissioner, U.S. Commission on Evidence-Based Policymaking

[REDACTED]

Exhibit “14”

Exhibit “15”

From: "Donovan, Joan M" [REDACTED]

To: "Sweeney, Latanya" [REDACTED]

Subject: Fb whistleblower docs?

Date: Sat, 16 Oct 2021 23:51:07 -0000

Importance: Normal

Hi Latanya,

[REDACTED] has the FB whistleblower files (tens of thousands of cell phone pictures of computer screens).

Would you want to talk with me and [REDACTED] about possibly making a searchable archive of these documents for the public interest?

[REDACTED] will be in town next week along with my whole team and we would really appreciate any time you could spare to talk this through and possibly have you host it.

I can be in touch with [REDACTED] about scheduling if this is something of interest.

Hope you're doing well!

Best,
Joan

Joan Donovan, PhD
Research Director
Harvard Kennedy's Shorenstein Center on Media, Politics and Public Policy

Exhibit “16”

From: "Manley, Laura" <[REDACTED]>

To: "Sweeney, Latanya" <[REDACTED]>, "Donovan, Joan M" <[REDACTED]>

Subject: Re: note for Elliot + Sheryl

Date: Tue, 12 Apr 2022 17:08:34 +0000

Importance: Normal

sounds good. will add this to comms doc and get feedback!

From: Sweeney, Latanya <[REDACTED]>

Sent: Tuesday, April 12, 2022 1:04 PM

To: Manley, Laura <[REDACTED]>; Donovan, Joan M <[REDACTED]>

Subject: Re: note for Elliot + Sheryl

Hi,

I think more of it as an short email to Doug that recommends a research message to Eliot and Sheryl. Maybe I should send the message to keep it more aligned with the research mission. I would write something like the following. See what you and the others think...

Doug, one of the groups that can benefit the most from making fbarchive public is Facebook itself. The documents reveal several issues that Facebook struggles with, and for which, the best solutions are not known. They are just open questions. FBarchive provides a perfect opportunity to get a thousand great minds to work on content moderation approaches and other difficult issues Facebook faces. These issues lie at the intersection of technology design and accompanying policy, and so fbarchive makes the environment ripe for research and insight. If you find it helpful, you might share the idea with Eliot or Sheryl that Facebook may be the biggest benefactor. You might even go further and suggest that they have researchers who work with us in some capacity after fbarchive launches.

--LS

From: "Manley, Laura" <[REDACTED]>

Date: Tuesday, April 12, 2022 at 12:47 PM

To: "Sweeney, Latanya" <[REDACTED]>, "Donovan, Joan M" <[REDACTED]>

Subject: Re: note for Elliot + Sheryl

If you have any suggestions on what needs to be included in the letter, feel free to include! Otherwise, we can draft and share w/ the team shortly

From: Sweeney, Latanya <[REDACTED]>

Sent: Tuesday, April 12, 2022 12:46 PM

To: Manley, Laura <[REDACTED]>; Donovan, Joan M <[REDACTED]>

Subject: Re: note for Elliot + Sheryl

Sounds good. Something like the research opportunities made possible to further understanding and effective approaches to content moderation. Let me know if you want me to draft something.

--LS

#48531.1

From: "Manley, Laura" <[REDACTED]>

Date: Tuesday, April 12, 2022 at 12:43 PM

To: "Sweeney, Latanya" <[REDACTED]>, "Donovan, Joan M" <[REDACTED]>

Subject: note for Elliot + Sheryl

Will make sure to add this to our comms to do list!

Laura Manley | Executive Director

Shorenstein Center on Media, Politics and Public Policy | Harvard Kennedy School

[REDACTED]

Exhibit “17”

From: "Donovan, Joan M" <[REDACTED]>
To: "Sweeney, Latanya" <[REDACTED]>, "[REDACTED]" <[REDACTED]>

Subject: Re: Next Steps
Date: Tue, 07 Mar 2023 06:42:13 -0000
Importance: Normal

Thanks Latanya for this information,

The IP issues came up because Nancy had said the school owns all TASC IP. Good to know this does not extend to the FBArchive project too. I was asking for clarity specifically about what IP she was referring to in her earlier email.

Happy to know the project does truly reside in your hands alone. That is good news to me.

It's been a tough few months, and I'd like to be kept in the loop for the project roll out.

Best,
Joan

Joan Donovan, PhD
Research Director
Harvard Kennedy's Shorenstein Center on Media, Politics and Public Policy

From: Sweeney, Latanya <[REDACTED]>
Sent: Monday, March 6, 2023 4:04:11 PM
To: Donovan, Joan M <[REDACTED]>; [REDACTED]; [REDACTED]; [REDACTED]
Subject: Re: Next Steps

Hi Joan,

The email exchange is painful to read, better yet, it is hard to imagine your experience. I am very sorry that you are having these kinds of communications. Take some time to take care of yourself.

As you could expect, I have had no conversations with anyone about those issues.

However, I did see that you mentioned FBarchive. I sent you a text message earlier to let you know that we are near the end now (at last!). So, keep an eye out for launch. I will send you messages. We will compose a history page, as I have done with several of my projects to enumerate contributions. Project history pages usually have entries at milestones and record the people involved and the nature of their contributions. The history page for FBarchive will of course memorialize the contributions made by you and TaSC. Examples: [thedatamap](#) and [voteflare](#).

I know the email exchange you shared can be distorting, especially read out of context. But in terms of IP and FBarchive... The technological IP (design, architecture, and implementation) in FBarchive belongs to the Lab alone. No one can claim IP over the original content of course, but the Lab also has IP in the redaction strategy used. Your team contributed the citation reference used to identify each image and document, and of course, you were part of the original concept. This is the kind of details that we will document on the history page.

A while ago, the FBarchive Privacy and Safety Board had a discussion about the scope of content and activities related to FBarchive. Here's the jest. Anyone can host workshops, write papers, make podcasts, or host social media discussions about its contents. None of these have to be us, or some of those may be us in our various Lab or Center

roles but not FBarchive itself. Also, FBarchive will not publish summaries on the site itself (though we have assembled topical and subject indices). As we near launch, the Board will revisit, but I think these rules of engagement seem the simplest and cleanest way to avoid Facebook and others believing we have some grip with Facebook or some other agenda.

I will keep you and your team members in my prayers as you work through this period. My hope is that you land somewhere great and do amazing work. Success is the best response.

—LS

Latanya Sweeney, Ph.D.
Daniel Paul Professor of the Practice of Government and Technology
Harvard Kennedy School
Harvard Faculty of Arts and Sciences
X.D. and Nancy Yang Faculty Dean of Currier House
Director, Public Interest Tech Lab (techlab.org)
Director, Data Privacy Lab (dataprivacylab.org)
Editor-in-Chief, Technology Science

Formerly: Chief Technology Officer, Federal Trade Commission
Commissioner, U.S. Commission on Evidence-Based Policymaking

[REDACTED]

pronouns: she/her/hers

From: Donovan, Joan M <[REDACTED]>
Date: Friday, March 3, 2023 at 5:56 PM
To: [REDACTED], Sweeney, Latanya <[REDACTED]>
Subject: Fwd: Next Steps

Read from the bottom up for updates from HKS about TASC.

Joan Donovan, PhD
Research Director
Harvard Kennedy's Shorenstein Center on Media, Politics and Public Policy

From: [REDACTED]
Sent: Friday, March 3, 2023 1:14:11 PM
To: Donovan, Joan M <[REDACTED]>
Cc: Elmendorf, Doug <[REDACTED]>; Wald, Sarah E. <[REDACTED]>; [REDACTED]
[REDACTED]; Cozza, Pam <[REDACTED]>; Gibbs, Nancy R.
<[REDACTED]>
Subject: RE: Next Steps

[Donor C]
Thanks Joan. I can take this one. It is true that the amendment (the paperwork) from [REDACTED] to fund a \$150K supplement to the existing award is in OSP's hands. The funds have not yet been sent over. Before the funds can flow, OSP must co-sign the amendment and return it to [REDACTED]. [Donor C]

We are close to being able to do so. I checked and apparently there is some minor work still to be done to complete the required internal statement of work, budget and budget justification for the supplement. I understand that [REDACTED], working with [REDACTED], can quickly complete what we need for ADO review and approval in GMAS, which would then

#55989.2

[Donor C] [Donor C]

signal to OSP to sign and return the amendment to [redacted] and [redacted] presumably would then fund the supplement for the project period thru 6/30/23.

Let me know if any other questions on this score.

From: Donovan, Joan M <[redacted]>

Sent: Friday, March 3, 2023 3:40 PM

To: Gibbs, Nancy R. <[redacted]>

Cc: Elmendorf, Doug <[redacted]>; Wald, Sarah E. <[redacted]>; [redacted]

[redacted]; Cozza, Pam

<[redacted]>

Subject: Re: Next Steps

I have a question about this too:

[Donor C]

“Do you still intend to finalize the [redacted] grant supplement project for \$150K, in which case the specific scope of work and budget needs to be submitted to RAO/ADO for internal review and approval prior to OSP accepting the funds.”

[Donor C]

I just talked to [redacted] who said this grant is already in Harvard’s account. I believe [redacted] also said this had been finalized. This grant ends in June 2023.

I have 2 students working on this research already and it should be reflected in the ledger.

I am worried that these modifications to the exit plan are going to leave me with a major overage.

Best,
Joan

Joan Donovan, PhD
Research Director
Harvard Kennedy’s Shorenstein Center on Media, Politics and Public Policy

From: Gibbs, Nancy R. <[redacted]>

Sent: Friday, March 3, 2023 6:08:26 AM

To: Donovan, Joan M <[redacted]>

Cc: Elmendorf, Doug <[redacted]>; Wald, Sarah E. <[redacted]>; [redacted]

[redacted]; [redacted] <[redacted]>; Cozza, Pam

<[redacted]>

Subject: Re: Next Steps

Hi Joan,
Thanks for your note and questions. We will review them and get back to you.
Best,
NG

From: Donovan, Joan M <[redacted]>

Date: Thursday, March 2, 2023 at 6:06 PM

To: Gibbs, Nancy R. <[redacted]>

Cc: Elmendorf, Doug <[redacted]>, Wald, Sarah E. <[redacted]>,

[redacted], Cozza,

#55989.3

Pam <[REDACTED]>

Subject: Re: Next Steps

Hello all,

I have received this email and have some outstanding questions with my own contract and other issues.

Adding Pam here who wrote me yesterday.

1. My contract with Harvard goes through Dec 31, 2024. Am I getting severance for being asked to leave in June 2024? [Donor E]
2. Will you return gift funds to [REDACTED] because I am not allowed to use the funds for intended outputs, like conferences and a podcast?
3. Can I see a full accounting of our budgets and spend down according to your plan? I am not sure we will be spending all the funding down accordingly as the exit strategy I submitted showed a large overage if we do not make some additional hires.
4. What IP do you have in mind that is retained by Harvard? I saw in your press releases a claim that the tech lab will keep the fb archive, but that was never discussed with me and Latanya. I am a partner on that project despite how it was framed in the media. I don't think it's fair that you told the media the project will continue without interruption as my team plays a large role in the workshops once the tech platform is finished. News leaders funding ends in Dec 31, 2023. I will inform [REDACTED] of the departure. [Donor F]
5. Most importantly, my team is being held in a very precarious position with these small incremental contract extensions. If there is money in the budget to give them proper contracts, why do it this way? It seems to me that the point is to hasten their departure more quickly. It is creating a hostile work environment for you to say in the press their is funding til June 2024 and then provide contracts in 3-4 month increments for the TASC team. These are human beings with families and medical issues that need assurances from their employer.

-joan

Joan Donovan, PhD

Research Director

Harvard Kennedy's Shorenstein Center on Media, Politics and Public Policy

From: Gibbs, Nancy R. <[REDACTED]>

Sent: Thursday, March 2, 2023 2:33 PM

To: Donovan, Joan M <[REDACTED]>

Cc: Elmendorf, Doug <[REDACTED]>; Wald, Sarah E. <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: Next Steps

Dear Joan,

Thank you very much for sharing your proposal for winding up the TaSC project by June 2024. I have conferred with Doug, [REDACTED], [REDACTED], Pam and [REDACTED] to understand better the details and provide this response. At a high level, the plan seems like a very good start, though the HKS leadership and I do need additional clarity in a few areas. Once finalized, this plan will provide the foundation for your team to be able to keep producing the work to which TaSC is committed, and make sure we all have a shared understanding of the path ahead.

The next step is to clarify the following:

1. Sponsored Funding: With TaSC's current staffing and run rate, all sponsored will likely be spent down by Dec 31, 2023, except for one [REDACTED] grant. [Donor H]

[Donor H]

- a. The [REDACTED] grant currently supports two staff people ([REDACTED] and [REDACTED] at 40%) and ends September 2024. We can request a re-budget from [REDACTED] and move more staff onto that grant as other grants run out. [Donor H]

#55989.4

[Donor C]

- b. Do you still intend to finalize the [REDACTED] grant supplement project for \$150K, in which case the specific scope of work and budget needs to be submitted to RAO/ADO for internal review and approval prior to OSP accepting the funds.
- c. We assume this plan provides for all the terms of the current grants to be met, and the RAO team will continue to work with you and the Shorenstein Center staff, as they do on all sponsored funding, to support the documentation, reporting and other administrative aspects.

2. The Team: Based on the information and plans you've provided, , we can extend all of your team that you have requested until at least September 30, 2023. (this includes all of your six staff, two fellows, and up to eight non student LHTs. And one fellow to be extended only until 8/30/23 per your plan.) Ideally, it would be best to extend them once, to what we believe will be their actual term date. In order to extend individual staff or other team members beyond 9/30/23, everyone will need to understand how they will be funded and what they will be working on, as outlined in item #3.

[Donor E]

3. Gift funding: As almost all of the grants will be completed by December 2023 (with most completed by September), HKS leadership and I will need to know what research you plan to continue through June 2024, with what staff and how that work will be funded (presumably through the [REDACTED] gift, since all grants will have ended). We would like that plan no later than 7/1/23, but the sooner everyone can review it, the sooner we will be able to confirm further extensions for any team members needed to do the work beyond what is noted in #2 above.

[Donor E]

[Donor E]

a. Additional activities: At the moment TaSC activities that are not specifically budgeted under a grant are being funded by the [REDACTED] gift. This includes some travel, events, conferences, staff retreats, etc. As part of the plan requested above for the use of the [REDACTED] gift, school leadership will need an outline of those activities between now and June 2024. We recognize that it is hard to fully plan for this now, but placeholders that we can all use as guideposts would be helpful (e.g. 3 staff attend 3 conferences with intended purpose at rough cost of \$1500 per person conference; 1 staff retreat per quarter at \$2500 per retreat). You provided some helpful information about events and conferences in your 1/31 proposal; can you clarify which of those activities are funded by gift or grant and which are hosted by TaSC (vs. attended by TaSC)? Any gathering that TaSC plans to hold at HKS/Harvard that is not already encompassed by your grants should be specifically described.

4. Expense guidelines: as a reminder, as with any program and activity at HKS, TaSC program expenses and spending should be consistent with University guidance, including what is deemed as "usual and customary" for a non-profit institution with a fiduciary responsibility to its funders. [REDACTED] [REDACTED], the Shorenstein Center's Director of Finance and Administration, in consultation with the Office of Financial Services, is accountable for overseeing the proper approval of expenditures. You can reach out to [REDACTED] with any questions regarding spending guidance or approval processes

5. Intellectual Property: Once we have a greater clarity and as part of the wind-down process, we will also need to sort out the IP issues. As we have discussed, all the IP produced by TaSC is owned by Harvard under the university policies, in part so that the University can meet its licensing obligations specified in various grant agreements.

Lastly, if at any time between now and June 2024, you have an opportunity to move the TaSC program to another institution, please let us know as soon as possible, and we will do all we can to facilitate a smooth transition, including discussing the issues stemming from Harvard's ownership of Tasc IP, so that the work may continue with minimal disruption.

Once you have had a chance to review this, we would like to coordinate with you on making the appropriate term extensions for your team.

Best,
Nancy

--

Nancy Gibbs

Edward R. Murrow Professor of Practice
Director, Shorenstein Center on Media, Politics and Public Policy
Harvard Kennedy School



Exhibit “18”

Lessig, Lawrence <[REDACTED]>

Attachments

Tue, Aug 29, 8:47 AM

to Diane Lopez, Joan Donovan, Sarah Wald

Diane,

Please see the attached regarding open access policies as they affect Joan Donovan. I'd be grateful for your thoughts.

Lawrence Lessig

Roy L. Furman Professor of Law and Leadership | Harvard Law School

[REDACTED]
[REDACTED]

[PDF ATTACHED](#) (on HLS letterhead)

Text of PDF

August 28, 2023

Harvard Office of General Counsel

Diane Lopez

[REDACTED]

Sarah Wald

Harvard Kennedy School

Adjunct Lecturer in Public Policy

[REDACTED]

Re: Public Availability of Grant Funded Research

Dear Diane:

I am writing to follow up on a concern shared with me by Dr. Joan Donovan. As Joan understands it, HKS has asserted ownership over her research and work product, including the work of the Technology and Social Change Project (TaSC). She fears that claim will interfere with her ability to make the work available generally. As you are likely aware, Joan studies media manipulation, with the goal of educating to reduce the disruption from disinformation. Her work was funded through grants requiring that the research be

publicly accessible. For example (and these examples are not exhaustive), [REDACTED] [REDACTED] [REDACTED] “require[d]” that TaSC “license non-software copyrightable work product created with project grant funds under the most recent version of the Creative Commons Attribution license (CC-BY).” Likewise, [REDACTED] [REDACTED] [REDACTED] gave \$450,000 to TaSC, one-third to support the design of Joan’s Global Media Manipulation casebook. In that agreement, Harvard committed, “Any publications, studies, or research funded by this Grant shall be made available to the public...” Likewise, an \$800,000 grant from [REDACTED] [REDACTED] [REDACTED] stipulated that “...news articles, text, photographs, audiovisual materials, or similar content developed using funds provided by [REDACTED] [REDACTED]...” shall be “...available free of charge to the public (such as via a public internet server with no subscription fees)...” [REDACTED] [REDACTED] grant does not expire until December. My understanding is that there remains about \$150,000 in this grant to publish the lectures and educational materials from the program.

I told Joan that did not believe the University would contradict these open-access obligations and that I would reach out to you informally to clarify the issue. Can you confirm that research conducted under grants with open access obligations remains publicly accessible, regardless of the continuing relationship of the researcher to Harvard?

I am grateful for your attention to this matter.

With kind regards,

Lawrence Lessig

cc: Dr. Joan Donovan

Lopez, Diane <[REDACTED]>

Aug 31, 2023, 9:55 AM

to Sarah, Lawrence, me

Dear Larry

First, I can confirm that Harvard owns the written work product of its staff members, including Dr. Donovan given her staff appointment. Harvard’s IP Policy makes this clear-- that individuals who are staff (without faculty appointments), like me for instance, do their work for the University as a work-for-hire. Second, the fact that Harvard owns a work does not mean it will not be made publicly available. In the case of the materials you reference specifically, they

will continue to be available in their archived version through a Harvard website. Certainly, publications resulting from grants made to Harvard that require open access will continue to be available to the public in accordance with the terms of those grants. As you know, Harvard generally is committed to open access and each of its schools have adopted an open access policy. See the one adopted by HKS: <https://osc.hul.harvard.edu/policies/hks/> The open access policy does not directly apply to Dr. Donovan's situation because it addresses works of scholarship owned by Harvard faculty and a limited assignment of rights to the University, rather than works by staff that the University owns ab initio, but I cite it because it reflects the University's general view that the useful information we generate should be made readily available.

Lastly, availability and use are two different things. Works made readily available are still subject to copyright and generally accepted attribution rules when used by others. Your letter does not touch on this subject, but if it is relevant to Dr. Donovan's concerns, she should raise with the Shorenstein Center (Prof. Nancy Gibbs) any request to use works after her Harvard employment ends (save fair use).

Diane

Diane E. Lopez
Vice President and General Counsel
Harvard University

[REDACTED]

Lessig, Lawrence <[REDACTED]>
Sep 4, 2023, 8:51 AM
to Diane, Sarah, me

Diane,

Thanks for the helpful response. But I'm not sure I understand (in general, and in this case) how this rule about "staff" applies to academic faculty. Joan was not only a staff member. She was "adjunct faculty." Does that status not accord any of the ordinary privileges of academic independence? That's a genuine question — not something I've researched — but it does strike me as critically compromising the academic integrity of a university if a slice of "faculty" don't have academic independence because "adjunct" vs something else.

Lawrence Lessig
Roy L. Furman Professor of Law and Leadership | Harvard Law School

[REDACTED]

[REDACTED]

Lopez, Diane <[REDACTED]>

Sep 7, 2023, 4:47 PM

to Lawrence, Sarah, me

Dear Larry

Sorry for the delay in my response. There is a lot going on at the moment.

To answer your question, these situations are not uncommon at Harvard. When a member of the administration (staff) happens to teach a course, the work they produce for teaching (syllabus, lecture notes, PowerPoint presentations, exam questions) belong to that person. Work produced by that same person when acting as an administrator/staff member, belongs to Harvard. [REDACTED] used to teach a course at the GSE. His work as Vice President and General Counsel belongs to Harvard. His course materials for the GSE class, in contrast, belong to him.

Diane

Lessig, Lawrence <[REDACTED]>

Sep 8, 2023, 6:34 AM

to Diane, me, Sarah

Thanks, Diane. I'm sure you're overwhelmed!

This distinction makes perfect sense. If you taught a class in the law school about GC-ing, that class is academic work. Your work (responding to my annoying emails, e.g.), is the work of being a GC. The category between these two that I'm still not clear on is research. I would have thought any research you do for your academic work would be the same as the academic work. So if, e.g., you surveyed GCs, or read and wrote notes on the history of GCs, etc., that would be in the academic bucket, not "owned by Harvard."

And if so, that's what's confusing me about the Joan situation. Certainly, her work running a research program is Harvard's (just as my work running Safra was Harvard's). But I would have thought the research she did (like the research I did), would have been hers? Or put more generally, unless my job is a researcher (e.g., at a library), "research" related to academic work is academic work. Certainly that's true for regular faculty. Is it not true for adjunct faculty?

Exhibit “19”

From: "Sweeney, Latanya" <[REDACTED]>

To: "Donovan, Joan M" <[REDACTED]>

Subject: Re: FBarchive history page and you!

Date: Wed, 7 Jun 2023 06:48:57 +0000

Importance: Normal

Attachments: FBarchive_-_Beta_Access_Instructions[84].pdf

Hi Joan,

It has been a busy day, but I wanted to respond to your message before conceding that this is really the next day (after midnight). Please see comments in context below.

From: Donovan, Joan M <[REDACTED]>

Date: Monday, June 5, 2023 at 7:39 PM

To: Sweeney, Latanya <[REDACTED]>

Subject: Re: FBarchive history page and you!

Dear Latanya,

I want to start off by apologizing. I think this discussion is going in a direction that I did not intend. I did not mean to imply there was a secretive exclusion, but rather the opposite. It was a conscious choice to remove TASC and I needed clarity on it. I am not alleging any misdeeds. Granted, I was blindsided by the erasure from the site. Again, I assume no malice. I get that my tone might come off blunt and/or bruised. Mostly, because I am very confused.

I understand that you want me to layout exactly how TASC will participate in the archive going forward. Nothing has changed this end. We have far less people power, but there remains a strong will to dig into the archive and create workshops for journalists and researchers, while also writing up findings. This is why I have sought early access since 2022 so that I could plan ahead. I can't be very specific without seeing what it is.

Thanks for sharing what you would like to do. Let's discuss the best ways to make those things happen.

First, you can access the beta version of FBarchive by following the instructions that [REDACTED] sent you on May 26. But I think you had setup an account a while ago but perhaps you have not yet used the system. If you already have an account, and I think you do, go to <https://beta.fbarchive.org> and login with HarvardKey or the email account you setup the account. If the system does not recognize your account, then you can create a new one (see instructions in the next paragraph).

If there are members of TaSC that you want to have an account, have them follow the instructions that [REDACTED] sent you earlier. I have attached a copy to this email for your quick access. Basically, a person sets up an account, but because access is still limited, they also complete a form to ignite the approval process. For organization, be sure to have them say "TaSC".

Access to the beta platform will allow you and TaSC members to begin to "dig into the archive." We are asking everyone with access to the beta platform to help us make improvements and itemize some utility the platform enabled. We are having a couple of zoom sessions for discussions. It would be great for them to participate.

You are free to "create workshops for journalists and researchers". Please do so! And we hope your workshops will have published findings or other reports. Obviously, once the platform is public, anyone can host a workshop and I hope many people will do so on lots of different topics. We are asking that no one host a workshop until the platform is public. But the beta launch provides a good opportunity to dig in and craft some ideas for workshops. We don't have a

#56922.1

process in place for FBarchive to be the host of a workshop though we just hired a new full-time facilitator (PhD from Harvard Gov) who will help figure all this out and help support workshops and research in the archive. So, if you have an idea for a workshop, you should plan on hosting it yourself but we can help. We have said the same to Shorenstein also.

Heads up! Many months ago, the Privacy and Safety Board came to a stark reality check based on the content of the archive: Facebook has no idea how to do moderation at scale, nobody does, so we don't want any content on the platform that requires moderation. We are encouraging discussions to be on Reddit or elsewhere. We are thinking we will be able to have a list of workshops, papers, and discussion thread locations on the site (more for the new facilitator to figure out).

Another heads up! The beta version doesn't yet have tags and a means to configure your own document of images. That will be added shortly, and certainly before the public launch.

TLDR;

My bigger issue is one of attribution, collaboration, and citation.

Perhaps, I should have prefaced this by saying I was contacted on Thursday by The NY Times asking "why did Harvard remove TASC from the FB project page?" The reporter also contacted a few other TASC fellows believing they got a scoop that I had quietly left Harvard. This is what I mean about erasure harming my professional reputation. Different stakes for me. This was the first time I noticed the change.

Delighted that a New York Times reporter cared enough to be checking the website so regularly to notice! Says a lot about what a big deal you are. Hope they continue to keep an eye on the archive and even use it (smile).

I understand I can be a bit muddy about "the who of TASC" as I do represent the research, but there's a much larger group of junior scholars and journalists. Some of the people at TASC prefer to go unnamed as individuals, but as a team we all are sensitive to removal of attribution from the web copy. TASC is group of researchers and fellows located at Shorenstein, but is not encapsulated as the Shorenstein center. The members of TASC who gave input on the FB papers include [REDACTED]. I don't know who wants to be named explicitly.

Happy to list them in the history page and provide access to the beta platform. You can see a link to the current version of the history page at the bottom of pages on the beta platform. When you say that these people gave you input on the documents, I assume you mean with respect to the class. We will ask each of these people if they want to be named on the history page in that capacity.

Moreover, I don't view attribution for intellectual labor as mere "historical gratuity," so much as an issue of fairness. My disagreement is about the politics of citation between junior and senior scholars and the dynamics of power/control at play within our project. Early on, TASC was approached by [REDACTED] and [REDACTED] to partner with them on the publication of these papers. After discussions with TASC, we believed these men would likely takeover rather than collaborate. Throughout the first year of working with the tech lab, I was confirmed in this choice as I was excited by your leadership and learned a lot from being in your shadow as I saw the features evolve. I even adopted your teaching model. It was inspiring to be so close to the development cycles and learn to organize projects from you.

Yes, conversations started among three of us, but the project evolved and expanded over time. That is the difference between a project and a publication. More than 100 people have worked on FBarchive in a meaningful and productive way over the year or so of effort. Members of the privacy and safety board spent crazy hours on Friday nights sweating details on specific images and crafting the policies that we would follow and shape what those initial ideas would really be. A dedicated group was meticulous in review, re-review, and review again and again of tens of thousands of images. It has been an amazing process and evolution. Tremendous gratitude goes to everyone to getting the platform to the beta version.

Even though this is difficult to discuss, it is helping me understand a rift in citational cultures of technoscience and social science. I could be wrong but this is the divide I see: you view the site's progress from pre-beta, to beta, to launch as markers guiding the project's phases, which determines timeline, use cases, and participation. The website is a living and evolving process, not a product unto itself. For me, the fbarchive is a major publication/output and the website is where citation/attribution occurs both historically and professionally. Whereas I see this as a last milestone for the TASC team, you are right that it will have associated maintenance and projects built out of it going forward. I think this disciplinary difference of approach is where the misunderstanding is rooted, not in any conspiracy.

Overall, this discussion is an important lesson for me about interdisciplinary collaborations and creating agreements early on. I made the assumption when we wrote out the original "about page" and the funding proposal that there was a tacit agreement to work as partners for the long haul.

There does seem to be some kind of difference here. But I don't think it stems from a technology versus social science perspective because I have worked with lots of social scientists on projects and papers previously. I think the difference is whether we see the effort on FBarchive as a living project or a static publication. This conversation reminds me of authorship conversations on a paper: At first, when the idea for the research paper begins, members of the group have ideas, but then the work gets done and along the way, ideas are reshaped and contributions vary, leading to final discussions about the order of names and in some cases, who should be listed as an author. This is what your statements remind me of, the final attribution for a static production. But FBarchive is not a static publication. We have plans to expand its content, for example. So, if you believe FBarchive is an ever-evolving project whose future is not just maintenance of its current content, then you want a history page to memorialize its phases (list the "authors" at each stage) and allow it to grow and evolve with new and different participants. And even if you think of FBarchive as a source for a static publication, then it has already spun a series of papers. The first would be its original idea, the next paper would be the initial design document, the third would be the citation format, the fourth paper would be the policies from the Privacy and Safety Board, the fifth would be the user interfaces that have been explored, and so on. The authors of each of these papers would be different people. So even if I took a paper attribution perspective, there have been lots of "papers" that are enumerated and described on the history page.

I understand why you don't want to be involved in conversations about TASC, or even with me about FB archive. TASC never should have become an issue for you at all. I regret trying to save it when I should have just gotten a lawyer and taken medical leave. Whatever my regrets, when I felt the brunt of the clampdown from HKS, you were there for me in very important ways. I will always be grateful. I remain very thankful for your mentorship and the work you put into helping me grow through this awful time.

Joan, you are a tough cookie with a lot to offer. You have to find the place and space that will let you grow and shine as big and bright as you can. When I say I don't want to be involved in conversations about TaSC, I mean I don't see how it helps anyone for me or FBarchive to be needlessly engaged in your disputes with HKS. I don't mind talking to you about FBarchive and other projects and offer you personal cheer and support.

--LS

With apologies,
Joan

Joan Donovan, PhD
Research Director
Harvard Kennedy's Shorenstein Center on Media, Politics and Public Policy

From: Sweeney, Latanya <[REDACTED]>
Sent: Monday, June 5, 2023 11:44 AM
To: Donovan, Joan M <[REDACTED]>
Subject: Re: FBarchive history page and you!

#56922.3

P.S. As for meetings and some kind of secretive exclusion from them, that never happened. I directly communicated with you and said that we have had no or very few meetings and that in the best interest of the interactions that were (are) unfolding between you and the others, it makes the most sense for me to make sure you are kept in the loop through direct communication between us. I have kept my word. As we got closer to the launch of beta, I let you know about progress and delays and kept you informed. As we are drafting the website, I asked you to edit the History page. Even our discussion about TaSC's being listed as an active participant is timely as the website is under construction through the beta phase. Today, I will send you a message about how to get on the beta platform and other next steps. There is no conspiracy here or your being kicked out or excluded from meetings or decision-making. I am trying to coordinate plans for the next stage now as I have expressed in each of my email messages to you this weekend. Without knowing what you want to accomplish or do, it is hard to do that. If all you want is what has already been done, then let's make sure it is made clear on the History page. Let me know what you want to do.

--LS

From: Sweeney, Latanya <[REDACTED]>
Date: Monday, June 5, 2023 at 11:34 AM
To: Donovan, Joan M <[REDACTED]>
Subject: Re: FBarchive history page and you!

Hi Joan,

Great. I think a phone call does more service to us than email. But I wanted to respond by email promptly in an attempt to help alleviate concerns. There is a lot going on in your message and a lot of confusion, and we do need to unpack it in order to move forward constructively.

With all due respect Joan, I'll be honest. I have no idea what TaSC means. I don't know anything about its future, its plans, or its current situation. I am not sure what TaSC is or will be. I am not part (and don't want to be part) of any conversations concerning it. On the one hand, TaSC is part of Shorenstein, and as such is included in the Shorenstein listing. But in my heart, TaSC is your project that goes with you and gets continued life in your vision. But where is it going? Will it have that name? Even if so, what would TaSC be doing with FBarchive? Without some understanding, it seems unwise to explicitly list TaSC as an active participant out of historical gratuity and thereby push FBarchive into uncertainty without even knowing the reason for what TaSC is doing with FBarchive. If you have some answers, then let's talk concretely and make meaningful plans. When we began, we had lots of ideas that as time has passed are no longer possible in the ways we had envisioned for a host of reasons. So, it is prudent to reassess at this point and see if we can make some of those plans of interest to you work in new ways. I'm trying to make what you want to do possible. That transcends the listing of groups on a website and focuses on actual participation. Let's do what makes sense in the setting we are in now.

If you have some specific language you want to see in the History page, please send it to me. I thought I added those points but perhaps attributed them to you and not TaSC. Please advise.

Joan, if you tell me what you want to do, what you want to make happen with the archive, we can work to make it happen. You had mentioned your hosting workshops or writing commentaries. Is that the kind of things you want to do? Please advise.

--LS

From: Donovan, Joan M <[REDACTED]>
Date: Monday, June 5, 2023 at 10:13 AM
To: Sweeney, Latanya <[REDACTED]>
Subject: Re: FBarchive history page and you!

I just reached out for a call.

I disagree that changes to the technology should mark changes in partnership to the project. That's a very technocratic way of thinking about progression. I understand that this is the way you've always done projects, but this was a 3-way partnership. To me that means, we should make bigger decisions together and that the point of all the early work was to get to this point of public release.

When it comes to the drafting of this history page, it is the case that it documents the history from the tech lab perspective. It does not record the longer history of TASC combing through the documents and retrieving information to substantiate the legitimacy of these documents or the decision to make an archive in the first place. That is when I brought the documents to you with the idea of doing a "rap genius" for these documents.

At some point, there was a decision to remove TASC from the curtain page and delete language in the "about" page regarding our partnership. That had to be done consciously. There was also a decision to remove me from meeting invites and from notes emails. I was under the impression we were in a holding pattern until the platform was worked out and that I would be included just as soon as it was nearing completion. Now I realize that was an assumption.

Best,
Joan

Joan Donovan, PhD
Research Director
Harvard Kennedy's Shorenstein Center on Media, Politics and Public Policy

From: Sweeney, Latanya <[REDACTED]>
Sent: Friday, June 2, 2023 6:14:12 PM
To: Donovan, Joan M <[REDACTED]>
Subject: Re: FBarchive history page and you!

Hi Joan,

Now that I am back at a computer, let me try to clarify and let's also connect by phone or Zoom to make sure we are on the same page..

From: Sweeney, Latanya <[REDACTED]>
Date: Friday, June 2, 2023 at 5:32 PM
To: Donovan, Joan M <[REDACTED]>
Subject: Re: FBarchive history page and you!

Hi Joan,

I think I raised more concerns unnecessarily with my response. No one is cutting you out of anything.! Let me get back to a computer and try to clarify or let's talk by phone or zoom. More shortly but I wanted to send you an immediate message so you take a deep breath.

—LS

#56922.5

Sent by finger typing on a phone

From: Donovan, Joan M <[REDACTED]>
Sent: Friday, June 2, 2023 3:51:26 PM
To: Sweeney, Latanya <[REDACTED]>
Subject: Re: FBarchive history page and you!

Thank you for your answers, but I think my point is much more banal.

No one told me or my team that we were no longer active participants. Moreover, hard costs do not dictate who counts as a partner org on projects, contributions do. But if you need an accounting of my hard costs, I can contact Nicole. Has any funding come in for fbarchive? If so, from who? Were they under the impression it was in partnership with TASC?

First, no one told you that you are no longer an active participant because no one is saying that –not me, not the website, no one. What we do have to do, and is the point of the email message to you and others on Monday, is to figure out what you want to do and how we can help you achieve it. The project is now starting its next stage, with development behind us and the public launch ahead. This is exactly the team to memorialize how we got to this point and contributions made in the first stage and to draft what the next stage looks like. In short, what do you want to do? What does TaSC want to do? This would have been my question in the Monday email. But let me know now or let's have the conversation now.

As for costs, I mentioned the \$1M figure, in part as a measure of my own pain related to the effort and the time it took. Of course, not everyone has to provide direct costs, and I think you were incredibly instrumental in providing valuable resources that are not direct costs. For these reasons, it is important that the history statement about the earlier stage provide proper acknowledgement of contributions.

TASC made many contributions including getting the documents and categorizing them, as well as promoting the archive in public forums, and having my team write testimonies and 1pagers, reviewing abstracts and holding office hours with students and so many meetings.

Sometimes you say TaSC and other times you say you, but these are not the same. Is there any further change needed to the history document?

I do see your point that this is how you've always done projects, but I disagree that we are not active participants. I have been working with civil society and scholars on these documents (using pinpoint) and many of the invited scholars to fbarchive are people I personally brought to the site.

I want your spark to shine and for you to make the most of FBarchive and the documents. What do you need or want to do to make that happen in the public release?

I also disagree that we should have our logo removed especially because under the circumstances it harms my professional reputation as I have been promoting the launch for over a year.

I don't understand what harm you are talking about. Everything is still in flux as we move towards the public release and contributions made in getting us to the public release are documented on the History page. I don't know what role you or TaSC want to play yet going forward, and while you say you want to be on the curtain page, you have not stated what you want to do in the next step. I cannot presume because so much is in flux at your end, but I am also not presuming the other way (no involvement) either. I am just asking, or would have asked on Monday when I returned from vacation. What is the level and nature of participation for you? for TaSC? Happy to hop on the phone or zoom or meet in person. Whatever works best for you.

--LS

#56922.6

Thanks,
Joan

Joan Donovan, PhD
Research Director
Harvard Kennedy's Shorenstein Center on Media, Politics and Public Policy

From: Sweeney, Latanya <[REDACTED]>
Sent: Friday, June 2, 2023 11:56:36 AM
To: Donovan, Joan M <[REDACTED]>
Subject: Re: FBarchive history page and you!

P.S. The Tech Lab has been the overwhelming contributor to the project as we approach \$1M in people and resources spent and tasks include the platform's design and function. But the concept starts with Frances and you, which I tried to accurately capture on the History page.

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From: Sweeney, Latanya <[REDACTED]>
Date: Friday, June 2, 2023 at 11:45 AM
To: Donovan, Joan M <[REDACTED]>
Subject: Re: FBarchive history page and you!

Hi Joan,

Apologies for just responding but I finally took a break off this week and got some motorcycle riding in and other things. I just saw your message. I think there is a lot of confusion about the website as we are transitioning from alpha to beta to the public launch and I do apologize for the confusion. Please see my responses in context below.

From: Donovan, Joan M <[REDACTED]>
Date: Thursday, June 1, 2023 at 10:30 PM
To: Sweeney, Latanya <[REDACTED]>
Subject: Re: FBarchive history page and you!

Hi Latanya,

I just noticed my team's name/logo was removed from the FB archive entirely. I'm also not able to sign into the platform and gain access to the documents either.

These are two different issues. Let me explain. First, there are a few different FBarchive websites operational at present as we shift from alpha to beta to the public launch and we still have the curtain page too. I was waiting until the History page went live on the beta website to contact you and all the others who have worked with us to get us to this point in order to facilitate your access to the beta website and discuss next steps, but before I did so, I wanted you to see your names and contributions listed on the history page. I was expecting to send the email to you and the others on Monday (when I return from vacation, but I can see if I can get that to you this weekend or later today! It will describe how to get onto the beta platform, etc.).

#56922.7

I suspect when you ask about TaSC being removed from the FBarchive website, you mean the curtain page (fbarchive.org). As we transition towards public launch, we want to list the organizations active at that time in the project. In short, the list of direct contributors is not a historical attribution but a contemporary one. This is why the history page is so important because it identifies how the project evolved and who was involved and how at each stage of its journey. I will make sure TaSC is named explicitly in the history page as your prior email message identified.

Can you tell me when I and the TASC team were erased from the project's front page? I ask because you ultimately had to be the one to direct someone to do it.

We are making tons of changes constantly, so it is all a moving target. I think the change to the curtain page involving the removal of TaSC would have occurred just after the beta launch when other updates had to be made. I am not certain of the date but it was recent. I am not sure what orgs are listed on the current version, but as we move towards the public launch, I would expect New America, Shorenstein, and the Data Privacy Lab to be listed because they are making direct contributions to the public version. Does that make sense? Again, the listing there is not a historic one but a contemporary one.

The internet archive has TASC still up there on March 5, 2023, so this turn was very recent. I don't believe it is fair that I'm undergoing an immense pressure to leave the school and having my credibility tore apart in the media, while also being stripped of my name on the work I fought so hard for. Having my team's name removed from the archive is incredibly upsetting to all of us, especially those who took on this risk and lost. I don't know how to explain to them what happened here. It's gutting.

Joan, I certainly know and understand your pain, but all my projects have followed this same attribution approach of using the history page to document contributions in context and allowing the current version of the project to reflect current activity. A good example is <https://thedatamap.org>. Also, I can definitely assure you that none of this has anything to do with the issues you are having with HKS. In fact, you can be assured that I will make sure you are properly and fully attributed to the FBarchive project, which is why you are so prominently identified by name for your contributions.

I am very grateful for all the work you put into it to carry it forward while I was experiencing pressure and isolation from the Dean, Nancy, and Laura. I don't mean to put this all on you. I'm asking for some insight, not laying the blame.

To be very clear, I don't know who made the decision to remove me from the meetings, minutes, and the website. Please tell me how that came about.

In the fall of last year, I felt as if some decisions were happening under my radar. For example, when [REDACTED] was let go without speaking to me and it was later communicated that it was simply because the project needed more "tech help." Then, I stopped getting calendar updates or notes from [REDACTED] and my team was no longer included in correspondence. You and I had agreed that some of those meeting were rather pointless and I trusted that I would be brought back in when the launch was happening.

I still work here even if no one will interact with me.

I want you to know that absolutely NO ONE communicated to me that I was being removed from the FB Archive, only that it would continue with the tech lab when I left. I also did not fully understand what you meant with TASC being deprecated to an "about" page. I was confused by that initially cause the "about" google doc was somewhat out of line with what happened internally and historically, but now I understand what purpose it serves. To be clear, the early history is wrong in that document about the initial drop and the chain of events. I'm sure someone has poured over this line by line legally, but we must always come correct. Again, I don't think this was done maliciously on your part, but I do want to know who wrote this history.

You are not being removed from FBarchive. Your important, critical and vital contributions are captured on the History page, or at least that is my intention to forever record that. In terms of moving forward, we need to figure out what

you, through TaSC or other group, want to do in sponsorship and how to do what you want to accomplish. We can talk about these details next week by phone or in person if you want.

Furthermore, no one has the right to erase my name from my research projects. Whether Laura and Nancy like it or not, we agreed to a clear 3 way partnership on this and we SHARED a vision for implementation, resources, and engagement. Isolating me and deleting my team's name/contribution as a founding partner feels like retaliation.

Joan, I have shared the history page with you. What do you consider incorrect? What would you have it say? No one is removing you. But I thought we are talking about TaSC and its contribution?

I need you to remember where we began this. Do you recall what I wrote/ said on Nov 8th, 2021 when the Dean asked me on what basis am I making public comments about Facebook, you and Laura asked if I wanted to take my name off the project after? I said that it was important to me to represent this work and see it through. We also planned strategy for roll out with press that was more than simply promoting the archive, but also creating public knowledge about its contents. This plan now seems to be buried. I want to reiterate that I think it's a waste of public impact to tone down the press engagement because we let down the same groups we aimed to serve with this project in the first place. I see there is also an intro to the platform for June 9th and I wonder why I had to find out about that like every other participant? Why am I being treated this way?

Yes, these are plans we had originally. But things evolved over the year, especially after some discussion with the Privacy and Safety Board months earlier. Commentary about the archive is being kept separate from the archive itself, so this changes some of the mechanics of those original plans but does not prohibit your vision or intended uses. And, you and I have been talking about possible media options; nothing has been decided on media.

I hope you understand where I'm coming from, and that you know I do value you as a colleague and friend.

This is an awful way to find out that one's own intellectual contribution can be relegated to the dustbin of history. Nancy and JZ both told me that "at Harvard you eat what you kill." And unfortunately, this time it's my spirit.

You know what this feels like so I don't have to describe it to you. Please tell me how did this happen?

I am very sorry Joan because I think I am to blame for the confusion and misunderstanding. I was just following the way I always do projects, but I think the current setting for you gives it an unintended color.

Let's talk!

Best,
Joan

Joan Donovan, PhD
Research Director
Harvard Kennedy's Shorenstein Center on Media, Politics, and Public Policy
www.mediamanipulation.org

From: Donovan, Joan M <[REDACTED]>
Date: Friday, May 26, 2023 at 4:05 PM
To: Sweeney, Latanya <[REDACTED]>
Subject: Re: FBarchive history page and you!

Hi Latanya,

#56922.9

I don't think we should call these leaks. After speaking with whistleblower aid and Francis, I think they would prefer for the term "drop" to be used in place of leaks.

Otherwise, I think we should add this this was a combined partnership with the technology and social change project as I spent some funds to bring in Amelia and had some RAs tasked with document analysis in the earlier formation of the project, as well brought in my media consultant.

Best,
Joan

Joan Donovan, PhD

Research Director

Harvard Kennedy's Shorenstein Center on Media, Politics and Public Policy

From: Sweeney, Latanya <[REDACTED]>
Sent: Friday, May 26, 2023 3:01:38 PM
To: Donovan, Joan M <[REDACTED]>
Subject: FBarchive history page and you!

Hi Joan,

We are minutes before the beta platform goes live for FBarchive, and I just realized that I had not sent you the draft of the history page for your review. Please find the link below. You are listed in the Feb 2022 and Nov 2021 entries. (Note only names in green will appear. And the list of affiliates at the end will not be made public.)

[REDACTED]

Let me know your thoughts.

--LS

#56922.10

Exhibit “20”

Event: Accepted: 4:00 PM: Follow-up discussion

Start Date: 2022-09-15 20:00:00 +0000

End Date: 2022-09-15 20:30:00 +0000

Location: L-218

Class: X-PERSONAL

Date Created: 2022-09-12 16:16:37 +0000

Date Modified: 2023-08-18 17:40:43 +0000

Priority: 5

DTSTAMP: 2022-09-12 16:16:37 +0000

Attendee: Elmendorf, Doug <[REDACTED]>