

Snap Inc.

Attorney General Patrick Morrisey
Office of the Attorney General
State Capitol Complex, Bldg. 1, Rm E-26
1900 Kanawha Blvd. E
Charleston, WV 25305

RE: Fentanyl Crisis and Snap's Response

November 23, 2022

Dear General Morrisey:

Protecting the Snapchat community is vitally important to us, and given the platform's significant reach with 13-34 year-olds in the United States, we believe we have an opportunity to further educate our users, and the people who care for them, on the dangers of fentanyl and how to stay safe.

As you know, fentanyl overdoses are now the leading cause of death for people ages 18-45 in the U.S. While the opioid epidemic is not new, the COVID-19 pandemic appears to have acted as an accelerant. During that time, public health experts observed a rise in mental health issues among students, and people sought out illegal prescription pills as a coping mechanism, not realizing they were often taking counterfeit pills laced with fentanyl. We also began to hear more heartbreaking stories from parents whose children died after taking what they believed to be a prescription pill.

In response to your letter dated October 13, 2022, regarding the fentanyl crisis and Snap's strategy to address it, we are writing to reassure you that we share your urgency about combating the nationwide fentanyl epidemic. This letter aims to provide you with direct answers as to how we are investing, engaging and responding to that crisis.

You raise a number of important questions in your letter, so we would like to answer them by explaining the major elements that comprise our fentanyl strategy. Snap's approach to combating fentanyl dealing and opioid overdoses centers on four key areas. First, we are investing heavily in on-platform detection and mitigation of lethal drug content. Second, we enhanced our law enforcement operations team and deepened our collaboration with law enforcement agencies to more effectively and efficiently support their investigations. Third, we developed and launched education and public awareness campaigns to help inform our community of the dangers of fentanyl and counterfeit pills, and continue to do so. Fourth, we released a new tool for parents and caregivers, called [Family Center](#), which allows parents to monitor who their teens are communicating with on Snapchat. We describe these initiatives in greater detail below.

1. On-Platform Detection and Mitigation

Snap has invested heavily over the last two years in improving our technological capabilities to proactively find and root out drug dealers and drug-related content before they ever get to users.

Our proactive detection tools use machine learning to identify potential drug-related content and quickly surface it for human review and enforcement. Our computer vision models start by estimating the likelihood that a given image or video depicts drugs. At the same time, we feed any text in the content – for example, captions or emojis – into a system that checks for keywords and other signals of drug activity. We determine which signals to search for in collaboration with the DEA and other subject-matter experts. If either review indicates that content is suspicious, the system surfaces that content for further human review. In addition to removing violating content that we identify, we also remove and block any user who attempts to communicate about the sale of illegal drugs or prescription pills on Snapchat. We also review and remove drug-related content that is reported to us by our community.

Using these tools and procedures, our team has manually reviewed millions of unique pieces of content for illegal drugs violations, and used that content to better train our machine learning models for more precise detection. These tools help us catch 90% of drug activity proactively so that we can ban dealers and keep them off the platform. And we are seeing signs that our efforts are working: a year ago, 23% of user reports were for drug-related content - as of last month, that percentage had dropped to just 3.3%. We have also received feedback from our third-party commercial intelligence partners that Snapchat is increasingly considered a ‘hostile place for drug dealers’.

Separately, we have partnered with commercial research services and other online platforms to identify, and eradicate, cross-platform drug activity. This is a critical component of the effort because we have regularly observed drug dealers using other online platforms to promote drugs available for sale and identify buyers, but then switch to messaging platforms such as Snapchat to discuss specifics of the sale, and then move to other payment apps to close the deal.

In an effort to prevent this type of activity, we utilize third-party intelligence services to proactively scan other platforms, looking for drug dealers who are advertising their products and trying to connect with Snapchatters. These services provide us with actionable information so we can find and remove violating content and accounts. But we are not stopping there: we have also initiated and pioneered a partnership with Meta to share signals of drug-related content and activity, which allows both platforms to bolster their own proactive detection. Our shared goal is to see this collaboration expand across the industry.

2. Law Enforcement Response and Collaboration

Snap has also advanced its anti-drug strategy by investing heavily in our support for law enforcement. In 2021 alone, we grew our Law Enforcement Operations team by 74%, and added senior team members who previously served as career prosecutors and law enforcement officials. To support law enforcement investigations, this team carefully reviews and responds to incoming requests for user data from law enforcement agencies globally. We typically respond in less than

30 minutes to emergency disclosure requests involving imminent threats to life or serious bodily harm.

In addition, we have started making proactive referrals to law enforcement in instances where we have found evidence of drug trafficking that appears to pose an imminent or serious threat to life. We understand law enforcement investigations are resource-intensive, so we make referrals when we have significant corroborating evidence that we believe will be valuable to law enforcement. We would welcome guidance or feedback from the Attorney General's Office on what would make such proactive referrals even more valuable and actionable.

We also created a Law Enforcement Outreach Program to raise awareness about Snap's policies for responding to legal data requests and to seek feedback from law enforcement agencies. For example, we have facilitated trainings for six DEA offices since March 2022, and recently delivered Snap's "Law Enforcement Operations 101" presentation for DEA Cyber Investigators from around the US. In addition, we hold an annual Snap Law Enforcement Summit to ensure wider access to knowledge about Snapchat and how to more efficiently request investigative data. Last year, more than 1,700 law enforcement officials from Federal, State and Local agencies participated in the Summit, and we expect to see even more this year. Our next Law Enforcement Summit will be held on December 17, 2022, and [registration](#) is now open to all law enforcement personnel in the US - we would welcome your investigators to attend.

3. Education and Public Awareness Campaigns

In early 2021, we began working with teens to better understand the opioid crisis. We partnered with Morning Consult, a leading independent research firm, to conduct the survey and their [findings](#) underscored that the growing mental health crisis among young people is connected to the fentanyl epidemic. The research indicated that young people are increasingly seeking out prescription drugs on the black market to alleviate stress and anxiety, and are often unaware that those pills could be fakes laced with deadly amounts of fentanyl.

Seeing that education would be critical to keeping Snapchatters safe, we began publishing [PSAs](#) developed by Song For Charlie, a non-profit dedicated to combating fentanyl poisoning. These PSAs have already been [viewed more than 260 million times](#). In addition, we produced a series focused on the fentanyl crisis within *Good Luck America*, a show on Snapchat with 2.3 million subscribers. To combat drug-related activity within Snapchat, we also developed an in-app educational tool called [Heads Up](#) that redirects Snapchatters to resources from expert organizations if they search for drug-related terms and slang. Since the launch of Heads Up, over 2.5 million Snapchatters have been served educational content from partner organizations like Song for Charlie, Shatterproof, the Centers for Disease Control and Prevention (CDC), the Community Anti-Drug Coalition, SAFE Project, National Institute on Drug Abuse, and the Substance Abuse and Mental Health Services Administration.

For the past year, we have also worked closely with the Ad Council to launch a [national fentanyl awareness campaign](#) targeting young Americans. We initiated conversations with the Ad Council in May of 2021, and drove the outreach that led to other technology platforms like YouTube, Meta, Twitter, and TikTok joining the effort. The campaign officially launched on October 18,

2022, and we remain deeply committed to its success. We contributed \$1 million in funding towards the campaign's creative development and production and have pledged another \$1 million in ad credits to ensure the campaign's PSAs reach as many young Americans on Snapchat as it can.

4. Family Center

Finally, we also recognize the central role that engaged parents have in educating their children and helping to keep them safe. This summer, we launched [Family Center](#), which we developed in collaboration with families and dozens of online safety and well-being experts. Family Center gives parents and caregivers tools to monitor who their teens' friends are on Snapchat and with whom they've recently communicated. It also enables parents to easily and confidentially report concerning accounts directly to our Trust and Safety team, available 24/7. And it helps parents access information about how to use our safety tools, tap into resources for important conversation-starters with teens, and find additional tips for using Snapchat safely.

* * *

In closing, we would reinforce that we share your concern about the fentanyl epidemic, and the horrifying impact it is having on our nation's youth. A societal problem like fentanyl and counterfeit pills requires a societal solution, and we are honored to work collaboratively with our community, parents and families, law enforcement, technology companies, and Federal and State agencies to find and implement those solutions. We are also working directly with state Attorneys General to better understand how criminals and criminal networks are operating so that we can continue to improve our defenses and work more efficiently with law enforcement. We would be grateful to work closely with you in that effort as well.

And as we have explained above, we are completely committed to doing our part to keep Snapchat a safe place for users, and to ensure that the next generation is fully educated on how deadly - and ubiquitous - fentanyl has become.

Please feel free to reach out should you have any additional questions.

Sincerely,

-Hank Dempsey
Head of US State Policy
Snap Inc.