



November 28, 2022

Attorney General Patrick Morrisey
State of West Virginia
Office of the Attorney General
State Capitol Building 1, Room E-26
1900 Kanawha Boulevard East
Charleston, WV 25305

Dear Attorney General Morrisey,

Thank you for your October 13 letter. Meta shares your concerns about those seeking to exploit social media by engaging in illegal activity, such as illicit drug sales, and we remain committed to addressing this issue on our apps. The epidemic of drug addiction — in particular opioids and methamphetamine — affects families everywhere, and no company or government organization can address it alone. Please find below our responses to your questions.

1. What is your strategy to combat drug dealing via your social media services?

Our Restricted Goods and Services policies cover both non-medical and pharmaceutical drugs. We prohibit the sale of illicit drugs on Facebook and Instagram and remove it from those apps when detected. Facebook's Community Standards and Instagram's Community Guidelines make it very clear that buying, selling or trading non-medical or pharmaceutical drugs is not allowed. In addition, our Advertising Standards prohibit ads that promote the sale or use of illicit or recreational drugs, or other unsafe substances, products or supplements. We identify violating content and enforce our policies through a combination of artificial intelligence (AI), reports from our community and human review. In some cases, content requires human review to understand the context in which it was posted (for example, to ensure it wasn't posted in the context of education or awareness raising).

Views of violating content that contain restricted goods and services, like fentanyl, are infrequent, as we remove much of this content before people see it. In the third quarter of 2022, we removed approximately 4.1 million pieces of content related to drugs on Facebook and about 2.5 million pieces of content related to drugs on Instagram. We publicly report the amount of content we action on Facebook and Instagram for violating our policies on a quarterly basis in our Community Standards Enforcement Report, available at <https://transparency.facebook.com/community-standards-enforcement>.

We block and filter hundreds of terms associated with drug sales. We also routinely block hashtags when we find violations, such as #mdma, #buyfentanyl, and #buyxanax, and we continue to review additional hashtags to detect violations of our policies. We also direct people to resources when they search for drug-related hashtags where the content is non-violating.

We also use a strike system to count violations, educate users on policy, and hold users increasingly accountable for the content they post on Facebook and Instagram. For most violations, if a user continues to post content that goes against the Facebook Community Standards or Instagram Community Guidelines, despite warnings and restrictions, we will disable the user's account. Additionally, beyond our strike policy, we also disable some accounts when we become aware of them, such as those of dangerous individuals, convicted sex offenders, accounts created to get around our restrictions, and in instances where people misrepresent their identity. More specifically, with respect to restricted goods such as illicit drugs, we also remove accounts on Facebook and Instagram we determine are dedicated to the sale of such goods.

2. How, if at all, are you utilizing algorithms and artificial intelligence to identify and prevent drug dealing on your social media services?

Our technology proactively detects and removes the vast majority of violating content before anyone reports it and often before anyone sees it. Of the violating content related to drugs that we removed in the third quarter of 2022, we proactively removed over 98% from Facebook and over 97% from Instagram before users reported it.

Our technology helps us in three main areas:

- **Proactive Detection:** AI has improved to the point that it can detect violations across a wide variety of areas, including drug-related content, without relying on users to report content to Meta, often with greater accuracy than reports from users. This helps us detect harmful content and prevent it from being seen by hundreds or thousands of people.
- **Automation:** AI has also helped scale the work of our content reviewers. Our AI systems automate decisions for certain areas where content is highly likely to be violating. This helps scale content decisions without sacrificing accuracy so that our reviewers can focus on decisions where more expertise is needed to understand the context and nuances of a particular situation. Automation also makes it easier to take action on identical reports, so our teams don't have to spend time reviewing the same things multiple times.
- **Prioritization:** Instead of simply looking at reported content in chronological order, our AI prioritizes the most critical content to be reviewed, whether it was reported

to us or detected by our proactive systems. In an instance where our systems are near-certain that content is violating our rules, they may remove it. Where there is less certainty it will prioritize the content for teams to review.

3. How do you work with law enforcement and others to disrupt drug dealing on your social media services?

We are committed to working with law enforcement, and we deeply respect and support the work law enforcement agencies do to keep us safe. Meta has a long history of working successfully with many federal, state, and local government agencies to address a wide variety of threats to people. When law enforcement alerts us about illegal, drug-related activity on Facebook or Instagram, we work to mitigate that threat and have developed tools designed to help law enforcement obtain quick responses to their legal requests and gather evidence in connection with official investigations. If we identify serious violations that constitute a credible threat of offline harm, we may contact law enforcement. User data privacy is one of our core values, and we handle disclosures to law enforcement on a case-by-case basis to ensure consistency with our data privacy practices and legal requirements.

Meta maintains a robust online system for law enforcement to submit legal requests for user data. This Law Enforcement Online Request System is available at www.facebook.com/records and enables law enforcement officials to submit requests for information and track the progress of their requests. Meta has also created Law Enforcement Guidelines, available at <https://www.facebook.com/safety/groups/law/guidelines>, to assist law enforcement in understanding the process, availability, and legal requirements for obtaining user records. As detailed in the Law Enforcement Guidelines, Meta also accepts emergency requests for information from law enforcement officers, which are addressed on an expedited basis, and requests for account preservations, which last 90 days pending receipt of formal legal process.

Meta also conducts training for law enforcement agencies across the country to educate them on how to submit and track their legal process requests more efficiently. This includes training on how to leverage the online request system, as well as training on the legal requirements necessary for obtaining account information.

In addition, we believe in the importance of cross-industry collaboration across social media platforms to tackle these issues. As part of our ongoing work to prevent and respond to illicit drugs online and the growing fentanyl crisis, earlier this year we began a partnership with Snapchat to identify patterns and signs of illicit drug-related content and activity. This work strengthens our ability to find and remove illicit drug-related content if it is shared on our apps, and bolsters our proactive detection efforts in finding and removing dealer accounts. As the program develops, we hope to add additional companies to help protect people and combat this industry-wide issue.

4. How much of your resources do you spend in efforts to combat drug dealing?

Today, we have 40,000 people working on safety and security and have invested more than \$16 billion in teams and technology in this area since 2016. We have approximately 15,000 reviewers globally who work every day to review content in line with our policies and help keep our apps safe. These reviewers go through training to ensure they understand our policies and can enforce those policies accurately and consistently at scale. Our reviewers' work is audited to ensure quality enforcement.

5. How do you promote awareness of the dangers of fake pills laced with fentanyl?

We care deeply about the impact of drug addiction in our communities, and are committed to continuing to do our part to combat this epidemic. We have a long history in the U.S. of programs that try to address the addiction crisis by raising awareness of the stigma of addiction, while also connecting individuals with resources and help. Meta consults with experts and partners with federal, state, and local authorities, as well as non-profits, on innovative ways they can use social media as a tool to respond to the opioid epidemic. We have seen that Meta tools can complement work on prevention, education, de-stigmatization, addiction support and awareness, and we continue to support community groups and NGOs that have used our platform for good.

We actively work to increase awareness about counterfeit prescription drugs and the specific risks to youth. For example, we have partnered closely with [Song for Charlie](#), a leading non-profit working to raise awareness of the fentapill (i.e., fake pills made of fentanyl) crisis. We have supported their public awareness campaigns that alert young people and parents about the dangers of such fake pills and fentanyl, and we are currently exploring other ways to bring this important message to life. Meta has also partnered with the [Ad Council](#) to educate young Americans and their parents and caregivers about the dangers and prevalence of fentanyl in counterfeit pills and illicit drugs, and separately, to help individuals with substance use disorders navigate resources and start their recovery journey. We have played a critical role in donating media space and developing and distributing content that will in the near future run later this year.

We also support the work of the DEA to keep prescription drugs out of the hands of youth. In an effort to bolster the DEA's Prescription Drug Take Back Day that occurs twice a year, we have worked with our long-time partner the [Center for Safe Internet Pharmacies](#) (CSIP) to create and promote an automated Facebook messenger experience on CSIP's Facebook page that provides people with quick and direct access to their closest disposal location, personalized FAQ's and treatment resources.

These efforts are part of a history of programs and partnerships we run to address the opioid and addiction crisis. Beyond these programs, we allow people to talk about their recovery from substance misuse, as well as post content in the context of education and

awareness raising (so long as this discussion does not also speak positively about, encourage the use of, coordinate, or provide instructions to make or use non-medical drugs). From working with Song for Charlie to raise awareness among youth about the dangers of fentanyl poisoning, to our collaboration with the [Partnership to End Addiction](#) on the National Stop Opioid Silence PSA campaign that has reached over 140 million people in an effort to destigmatize addiction and connect people with recovery resources, we are committed to doing our part to implement solutions.

Most recently, Meta joined forces with the [Voices Project](#) to launch the [2022 Mobilize Recovery National Bus Tour](#). As lead sponsor of the 27 city tour, we utilized our platform and tools to amplify the work of experts, voices of people in recovery, and leaders on the front lines. Additionally, when people search for drugs or help on Facebook or Instagram, we direct them to the [Substance Abuse and Mental Health Services Administration National Helpline](#) (SAMHSA) to help educate people about the risks, in an effort to prevent drug misuse.

We are always working to improve our policies and enforcement practices, and we will continue to closely monitor this issue and to consult with external stakeholders.

Thank you, again, for the opportunity to answer your questions. We look forward to working with your office going forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Sachs". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Dan Sachs
Public Policy Director