



July 20, 2023

Via Secure Release Portal

Department of Homeland Security
Privacy Office, Mail Stop 0655
Department of Homeland Security
2707 Martin Luther King Jr. AVE SE
Washington, DC 20528-065

Freedom of Information Act Request: Center for Countering Digital Hate

Dear FOIA Officer:

America First Legal Foundation (“AFL”) is a national, nonprofit organization working to promote the rule of law in the United States, prevent executive overreach, and ensure due process and equal protection for all Americans, all to promote public knowledge and understanding of the law and individual rights guaranteed under the Constitution and laws of the United States. To that end, we file Freedom of Information Act (“FOIA”) requests on issues of pressing public concern, then disseminate the information we obtain, making documents broadly available to the public, scholars, and the media. Using our editorial skills to turn raw materials into distinct work, we distribute that work to a national audience through traditional and social media platforms. AFL’s email list contains over 78,000 unique addresses, our Twitter page has over 157,000 followers, the Twitter page of our Founder and President has over 483,000 followers, our Facebook page has 139,000 followers, and we have another approximately 31,900 followers on GETTR.

I. Introduction

The Center for Countering Digital Hate (“CCDH”) describes itself as a “not-for-profit non-governmental organization” that “works to stop the spread of online hate and disinformation through innovative research, public campaigns and policy advocacy.”¹ CCDH describes its founder and CEO, Imran Ahmed, as an “authority on social and psychological malignancies on social media, such as identity-based hate, extremism, disinformation, and conspiracy theories.”² However, CCDH is also described as “[a]n

¹ ABOUT — CENTER FOR COUNTERING DIGITAL HATE | CCDH, <https://counterhate.com/about/> (last visited July 20, 2023)

² *Id.*

611 Pennsylvania Ave SE #231
Washington, DC 20003

320 South Madison Avenue
Monroe, Georgia 30655

NGO cut-out engaged in brazen smearing, attacking of dissenting views, deplatforming, censoring and pro-active shrinkage of the Overton window [by] strategically conflating serious voices with the fringes, mixing them together to isolate genuine actors and squash dissent.”³

Imran Ahmed and members of CCDH’s board consist of political operatives at the highest levels within the UK Labour Party.⁴ Through his work with Stop Funding Fake News (SFFN), which was later folded into CCDH,⁵ Imran Ahmed took credit for a so-called “defund racism” campaign associated with Black Lives Matter⁶ to cause Google to remove their ads from The Federalist and ZeroHedge.⁷ Today, Imran Ahmed leads both CCDH US and CCDH UK and “employ[s] a large team of people who collaborate together to fulfill the shared mission of both organizations.”⁸

CCDH is most well-known for publishing a list of “twelve anti-vaxxers who play a leading role in spreading digital misinformation about Covid vaccines,” and urged social media platforms to “establish a clear threshold for enforcement action” and “to deplatform the most highly visible repeat offenders, who we [CCDH] term the Disinformation Dozen.”⁹ This included Robert F. Kennedy Jr.¹⁰ On the same day that CCDH published its report on the “Disinformation Dozen,” twelve Democratic state attorneys general sent a letter to Twitter and Facebook, cited CCDH’s work, and called on them to “effectively root[] out fraudulent information about coronavirus vaccines.”¹¹ During the now-infamous July 15, 2021, White House press conference when Press Secretary Jen Psaki admitted to “flagging problematic posts for Facebook,” Psaki also implied that the “12 people who are producing 65 percent of anti-vaccine misinformation [should not] remain active on Facebook.”¹² Since then,

³ Susan Schmidt et al., *Report on the Censorship-Industrial Complex: The Top 50 Organizations to Know* (May 10, 2023), <https://tinyurl.com/msp8xvnp>.

⁴ See, e.g., Paul D. Thacker, *Twitter Files: Who Are the People Claiming RFK Jr. is “Disinformation”?* (July 18, 2023), <https://tinyurl.com/5n9atvds>; INFLUENCE WATCH, CENTER FOR COUNTERING DIGITAL HATE, <https://tinyurl.com/4d6wh4d8> (last visited July 20, 2023).

⁵ INFLUENCE WATCH, STOP FUNDING FAKE NEWS, <https://tinyurl.com/2wa3z4js> (last visited July 20, 2023).

⁶ STOP FUNDING MISINFORMATION, DEFUND RACISM: BLACK LIVES Matter, <https://tinyurl.com/yrx4cusc> (last visited July 20, 2023).

⁷ See @Imi_Ahmed, TWITTER (June 16, 2020, 3:30 PM), <https://tinyurl.com/2r2y53de>; Infotagion, Episode 20: Imran Ahmed and Chris Stokel-Walker (July 1, 2020), <https://tinyurl.com/37tdanaw>; see also Adele-Momoko Fraser, *Google Bans Website Zerohedge From Its Ad Platform Over Comments on Protest Articles*, NBC NEWS (June 17, 2020), <https://tinyurl.com/4zzh8z9n>.

⁸ ABOUT — CENTER FOR COUNTERING DIGITAL HATE | CCDH, *supra*.

⁹ CCDH, THE DISINFORMATION DOZEN: WHY PLATFORMS MUST ACT ON TWELVE LEADING ONLINE ANTI-VAXXERS at 5 (Mar. 24, 2021), <https://tinyurl.com/2p9uyykh>.

¹⁰ *Id.* at 14.

¹¹ Letter from William Tong, Att’y Gen. of Conn. et al., to Jack Dorsey, Chief Executive Officer, Twitter, Inc., and Mark Zuckerberg, Chairman & Chief Executive Officer, Facebook, Inc. (Mar. 24, 2021), <https://tinyurl.com/2zt85p63>.

¹² WHITE HOUSE, *Press Briefing by Press Secretary Jen Psaki and Surgeon General Dr. Vivek H. Murthy* (July 15, 2021), <https://tinyurl.com/4jp9r68z>.

CCDH has also taken credit for causing Google to change its advertising policies in support of censorship.¹³

II. Requested Records

All records of communications between the custodians listed below with Imran Ahmed or with any e-mail account ending in the domain name “@counterhate.com.” The time frame for this request is January 20, 2021, to the date this request is processed.

III. Custodians

Office of the Secretary

1. Alejandro Mayorkas, Secretary of DHS
2. Samantha Vinograd, Senior Counselor for National Security

Office of Strategy, Policy, and Plans

3. ROBERT SILVERS, Under Secretary.

Cybersecurity and Infrastructure Security Agency (“CISA”)

4. Jen Easterly, Director
5. Kim Wyman, Senior Cybersecurity Advisor & Senior Election Security Leader
6. Lauren Protentis
7. Geoffrey Hale
8. Allison Snell
9. Brian Scully

IV. Fee Waiver

AFL requests a waiver of all search and duplication fees associated with this request under 5 U.S.C. § 552(a)(4)(A)(iii). First, AFL is a qualified non-commercial public education and news media requester. Our officials routinely appear on national television and use social media platforms to disseminate the information it has obtained about federal government activities. In this case, AFL will make your records and your responses publicly available for the benefit of citizens, scholars, and others, and the public’s understanding of your policies and practices will be enhanced through AFL’s analysis and publication of the requested records. As a nonprofit organization, AFL does not have a commercial purpose, and releasing the requested information is not in AFL’s financial interest. Accordingly, AFL has been granted fee waivers by the Departments of Defense, Education, Energy, Health and Human Services, Justice, Interior, and Homeland Security, and the Office of the Director of National Intelligence. Second, the waiver is proper as disclosure of the requested

¹³ @CCDHate, TWITTER (Mar. 30, 2023, 6:05 AM), <https://tinyurl.com/3985kemf>.

information is “in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government.”¹⁴

V. Processing and Production

The agency must comply with the processing guidance in the Attorney General’s Memorandum on Freedom of Information Act Guidelines.¹⁵ If you have any questions or believe further discussions regarding search and processing will facilitate a more efficient production of records of interest to AFL, please do not hesitate to contact me at FOIA@aflegal.org.

AFL welcomes production on an agreed rolling basis to accelerate the release of responsive records. If possible, please provide responsive records in an electronic format by email. Alternatively, please provide responsive records in native format or in PDF format on a USB drive to America First Legal Foundation, 611 Pennsylvania Ave SE #231, Washington, DC 20003.

Thank you in advance for your cooperation.

Sincerely,
/s/ Michael Ding
Michael Ding
America First Legal Foundation

¹⁴ 5 U.S.C. § 552(a)(4)(A)(iii).

¹⁵ U.S. Dep’t Just. (Mar. 15, 2022), <https://tinyurl.com/4duy4r5k>.