Case No. 1:26-cv-815 (JEB)

EXHIBIT 1

Log in

Instagram Community Guidelines FAQs

April 19, 2018

What are Community Guidelines and how do they differ from Terms of Use?

We want Instagram to continue to be a safe place for inspiration and expression. Our Community Guidelines set out our policies for what we do and don't allow on Instagram in order to achieve this. Our Terms of Use, on the other hand, are an agreement, outlining our obligations to you and your obligations to us (one of which is to not violate our Community Guidelines). Read our Terms of Use.

What do our Community Guidelines cover?

- **Intellectual Property** – Making sure you have the rights to post the content you share.

Log in

- **Spam** – This is not allowed on Instagram (creating or submitting unwanted email, comments, likes or other forms of commercial or harassing communications).
- **Illegal Content** – We don't allow support or praise of terrorism, organized crime or hate groups on Instagram. Offering sexual services and selling firearms and drugs are also prohibited.
- **Hate Speech, Bullying and Abuse** – We remove credible threats of violence, hate speech and the targeting of private individuals. We do not allow attacks or abuse based on race, ethnicity, national origin, sex, gender, gender identity, sexual orientation, religion, disability or disease.
- **Self-Injury** – We do not allow glorification or encouragement of self-injury, including eating disorders. We do allow content that references self-injury and eating disorders if it is for the purpose of creating awareness or signposting support.
- **Graphic Violence** – Graphic violence is not allowed and we may remove videos or images of intense, graphic violence to make sure that Instagram stays appropriate for everyone. If shared in relation to important and newsworthy events, and this imagery is shared to condemn or raise awareness and educate, it may be allowed.

Who decides what the Community Guidelines should cover?

Instagram is a reflection of our diverse community of cultures, ages and beliefs. We've spent a lot of time thinking about the different points of view that create a safe and open environment for everyone. We created the Community Guidelines so you can help us foster and protect this amazing community.

I think a photo, video or comment I've seen on Instagram breaks the Community Guidelines. What should I do?

violates our guidelines. These teams are based in locations worldwide in order to give coverage to reports 24 hours a day, seven days a week.

Even if you or someone you know doesn't have an Instagram account, you can still make a report. When you complete the report, try to provide as much information as possible, such as links, usernames and descriptions of the content, so we can find and review it quickly.

What happens if somebody breaches the Community Guidelines?

It is our policy to remove content that violates our community guidelines. We may remove entire posts if either the imagery or associated captions violate our guidelines. We also may disable entire accounts for violations of our Community Guidelines.

We may work with law enforcement, including when we believe that there's risk of physical harm or threat to public safety. For more information, visit our full blog:section here or view the full guidelines on our Help Center.

Learn more about our Community Guidelines.

RELATED ARTICLES

Check out more announcements about safety

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EXHIBIT 2

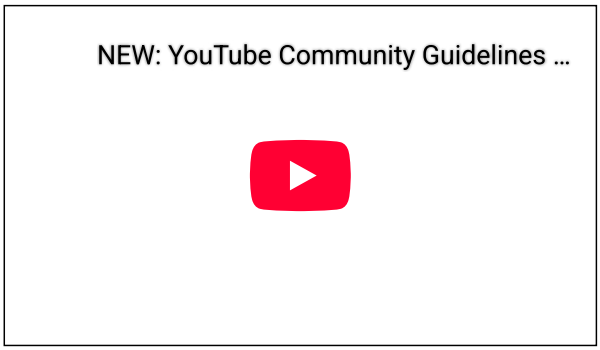
YouTube's Community Guidelines

When you use YouTube, you join a community of people from all over the world. The guidelines below help keep YouTube fun and enjoyable for everyone.

If you see content that you think violates these guidelines, report it.

Sometimes, content that would otherwise violate our Community Guidelines may stay on YouTube when it has Educational, Documentary, Scientific, or Artistic (EDSA) context, including content that is in the public's interest. In these cases, the content gets an EDSA exception.

These policies apply to all types of content on our platform, including, for example, unlisted and private content, comments, links, posts, and thumbnails. This list isn't complete.



Subscribe to the YouTube Creators channel for the latest news, updates, and tips.



Spam & deceptive practices

The YouTube Community is one that's built on trust. Content that intends to scam, mislead, spam, or defraud other users isn't allowed on YouTube.

- Spam, deceptive practices, & scams policies
- Impersonation policy
- External links policy
- Fake engagement policy
- Playlists policy
- Additional policies



Sensitive content

We hope to protect viewers, creators, and especially minors. That's why we've got rules around keeping children safe, sex & nudity, and self harm. Learn what's allowed on YouTube and what to do if you see content that doesn't follow these policies.

- Nudity & sexual content policies
- Thumbnails policy
- Child safety policy
- Suicide, self-harm, and eating disorders policy
- Vulgar language policy



Violent or dangerous content

Hate speech, predatory behavior, graphic violence, malicious attacks, and content that promotes harmful or dangerous behavior isn't allowed on YouTube.

- Harmful or dangerous content policies
- Violent or graphic content policies
- Violent criminal organizations policy
- Hate speech policy
- Harassment & cyberbullying policies



Regulated goods

Certain goods can't be sold on YouTube. Find out what's allowed and what isn't.

- Sale of illegal or regulated goods or services policies
- Firearms policy

Misinformation



Certain types of misleading or deceptive content with serious risk of egregious harm are not allowed on YouTube. This includes certain types of misinformation that can cause real-world harm, like promoting harmful remedies or treatments, certain types of technically manipulated content, or content interfering with democratic processes.

- Misinformation policies
- Elections misinformation policies
- Medical misinformation policies

Educational, Documentary, Scientific, and Artistic (EDSA) content

Our Community Guidelines aim to make YouTube a safer community. Sometimes, content that would otherwise violate our Community Guidelines may stay on YouTube when it has Educational, Documentary, Scientific, or Artistic (EDSA) context. We may also make exceptions for content that is in the public's interest, such as congressional or parliamentary proceedings, campaign speeches, or debates over ongoing government actions. In these cases, the content gets an EDSA exception. This is not a pass to violate our Community Guidelines.

- How YouTube evaluates Educational, Documentary, Scientific, and Artistic (EDSA) content

Get creator tips for YouTube policies and guidelines.

***Please take these rules seriously**. If a YouTube creator's on- and/or off-platform behavior harms our users, community, employees or ecosystem, we may respond based on a number of factors including, but not limited to, the egregiousness of their actions and whether a pattern of harmful behavior exists. Our response will range from suspending a creator's privileges to account termination.*

Need more help?

Try these next steps:

Post to the help community

Get answers from community members

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EXHIBIT 3

The X Rules

X's purpose is to serve the public conversation. Violence, harassment and other similar types of behavior discourage people from expressing themselves, and ultimately diminish the value of global public conversation. Our rules are to ensure all people can participate in the public conversation freely and safely.

Safety

Violent Content: You may share graphic media if it is properly labeled, not prominently displayed and is not excessively gory or depicting sexual violence, but explicitly threatening, inciting, glorifying, or expressing desire for violence is not allowed. Learn more.

Violent & Hateful Entities: You can't affiliate with or promote the activities of violent and hateful entities. Learn more.

Child Safety: We have zero tolerance for any forms of child sexual exploitation and remove certain media depicting physical child abuse to prevent the normalization of violence against children. Learn more.

Abuse/Harassment: You may not share abusive content, engage in the targeted harassment of someone, or incite other people to do so. Learn more.

Hateful conduct: You may not attack other people on the basis of race, ethnicity, national origin, caste, sexual orientation, gender, gender identity, religious affiliation, age, disability, or serious disease. Learn more.

Perpetrators of Violent Attacks: We will remove any accounts maintained by individual perpetrators of terrorist, violent extremist, or mass violent attacks, and may also remove posts disseminating manifestos or other content produced by perpetrators. Learn more.

Suicide: You may not promote or encourage suicide or self-harm. Learn more.

Adult Content: You may share consensually produced and distributed adult nudity or sexual behavior, provided it's properly labeled and not prominently displayed. Learn more.

Illegal or Certain Regulated Goods or Services: You may not use our service for any unlawful purpose or in furtherance of illegal activities. This includes selling, buying, or facilitating transactions in illegal goods or services, as well as certain types of regulated goods or services. Learn more.

Privacy

Private Information: You may not publish or post other people's private information (such as home phone number and address) without their express authorization and permission. We also prohibit threatening to expose private information or incentivizing others to do so. Learn more.

Non-Consensual Nudity: You may not post or share intimate photos or videos of someone that were produced or distributed without their consent. Learn more.

Account Compromise: You may not use or attempt to use credentials, passwords, tokens, keys, cookies or other data to log into or otherwise access, add, delete or modify the private information or account features of any X account other than your own (or those you have been directly authorized to do so via X's Teams authorization, OAuth authorization or similar mechanism).

Authenticity

Platform Manipulation and Spam: You may not use X's services in a manner intended to artificially amplify or suppress information or engage in behavior that manipulates or disrupts people's experience on X. Learn more.

Civic Integrity: You may not use X's services for the purpose of manipulating or interfering in elections or other civic processes. This includes posting or sharing content that may suppress participation or mislead people about when, where, or how to participate in a civic process. Learn more.

Misleading and Deceptive Identities: You may not impersonate individuals, groups, or organizations to mislead, confuse, or deceive others, nor use a fake identity in a manner that disrupts the experience of others on X. Learn more.

Synthetic and Manipulated Media: You may not deceptively share synthetic or manipulated media that are likely to cause harm. In addition, we may label posts containing synthetic and manipulated media to help people understand their authenticity and to provide additional context. Learn more.

Copyright and Trademark: You may not violate others' intellectual property rights, including copyright and trademark. Learn more about our trademark policy and copyright policy.

Third-party advertising in video content

You may not submit, post, or display any video content on or through our services that includes third-party advertising, such as pre-roll video ads or sponsorship graphics, without our prior consent.

Enforcement and Appeals

Learn more about our approach to enforcement, including potential consequences for violating these rules or attempting to circumvent enforcement, as well as how to appeal.

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EXHIBIT 4

TRUTH. Help Center

Home > Moderation > Moderation Faq

The Moderation FAQ

Answers to questions you may have about the process

1. How do I report a post?

To report a post, follow these steps: _Step 1: _Open the post and tap the three-dotted icon at the bottom-right. _Step 2: _Select "Report Truth". _Step 3: _Choose a reason and add a comment if desired. _Step 4: _Submit the report.

2. How do I report a user?

It is vitally important to make sure that you Report Message so that our moderators are able to see the details of the chat thread you are reporting. If the message itself is not reported, our team is unable to view the content in order to ensure compliance with our Terms of Service.

Step 1: Navigate to the bottom right of your Home Feed and click the Messages tab. *Step 2:* Choose the chat for which you want to report a message. If you are on Android or the web, it will say Report User. *Step 3:* After locating the message you feel should be reported, press down on the message/click the ellipses [. . .] until the prompt appears. *Step 4:* Choose Report while inside the chat. You will be asked to provide a reason for reporting, and you will be allowed to include additional comments.

3. Do you suppress viewpoints simply for contradicting the prevailing narrative or the views of President Trump on topics of public interest?

No. TRUTH Social seeks to create a free speech haven in the social media sphere and encourages your unencumbered free expression.

4. Why do you moderate content?

We cherish free expression. TRUTH Social must prevent illegal and other prohibited content from contaminating our platform. We maintain and apply our Terms of Service accordingly.

5. Why don't I see my post?

We use artificial intelligence (AI) to assist our hardworking moderators, and some posts are flagged for deletion or marked “sensitive” by AI. Human moderators oversee this process, conduct multi-level reviews, and are empowered to reinstate posts that comply with our Terms of Service.

6. Why did you delete my post or mark it as sensitive?

While the AI we use is very good, it is not error-proof. Assisted by technology, our moderators use their best judgment to ensure compliance with our Terms of Service. We are constantly refining and improving this process—including by identifying and correcting mistakes.

7. What does it mean when I receive an email stating that "my status has been removed?"

This means your post has been deleted, usually after being flagged by AI (see above.)

8. What is the specific reason my post was removed?

We haven't built that functionality out yet. Rest assured, it's in the works!

9. Is my account automatically penalized if my post is deleted or marked as sensitive?

No.

10. Why did you suspend me?

While we hope to rarely suspend an account, we do suspend accounts for violating our Terms of Service. If your account is suspended, you will receive a notification email from our support team.

11. Could you please suspend a user I dislike?

Generally not, provided the users' posts comply with our Terms of Service. You can mute or block users whose content you'd prefer not to see.

12. How can I appeal a suspension?

If you feel our decision to suspend you was unjust, immoral, or downright wrong, you are encouraged to appeal. Please send an email to **contact@truthsupport.com.** In the subject line, please write **"@Appeal"** along with your **username**. Our team will take a close look and reverse or uphold the suspension.

13. How long do suspensions last?

Your first suspension is for 48 hours, and the length of each successive suspension increases from there.

14. What does it mean if I receive an email letting me know that I'm banned?

Indefinite bans are a rare and severe sanction, and are generally reserved for the most egregious violations of our Terms of Service. Examples include threatening violence, posting pornography, or infringing on intellectual property rights. Users may also receive a ban following repeated account suspensions.

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EXHIBIT 5

TRUTH. Help Center

Home > Legal > Terms Of Service

Truth Social Terms of Service

Welcome to the TRUTH SOCIAL family of products, including an online platform owned and operated by T MEDIA TECH LLC, which is available on www.truthsocial.com**, as well as our related mobile application platform under Truth Social and our Truth+ app (collectively, the "Apps"). The Site and Apps have been created for your entertainment as well as educational and personal use.**

PLEASE READ SECTIONS 22 AND 23 BELOW CAREFULLY AS THEY CONTAIN A BINDING ARBITRATION AGREEMENT AND A CLASS ACTION WAIVER, WHICH MAY AFFECT YOUR LEGAL RIGHTS.

1. AGREEMENT TO TERMS

These Terms of Service constitute a legally binding agreement made between you, whether personally or on behalf of an entity ("you") and Truth Social ("we," "us" or "our"), concerning your access to and use of the Site and Apps as well as any other media form, media channel, mobile website, mobile application, or streaming service that is related, linked, or otherwise connected thereto (collectively, the "Service").

You agree that by accessing the Service, you have read, understood, and agree to be bound by all of these Terms of Service. If you do not agree with all of these

Terms of Service, then you are expressly prohibited from using the Service and you must discontinue use immediately.

Supplemental Terms of Service or documents that may be posted on the Site or the Apps from time to time are hereby expressly incorporated herein by reference. We reserve the right, in our sole discretion, to make changes or modifications to these Terms of Service at any time and for any reason.

We will alert you about any changes by updating the "Last updated" date of these Terms of Service, and you waive any right to receive specific notice of each such change except herein or on the Site or Apps.

It is your responsibility to periodically review these Terms of Service to stay informed of updates. You will be subject to and will be deemed to have been made aware of and to have accepted, the changes in any revised Terms of Service by your continued use of the Site and the Apps after the date such revised Terms of Service are posted.

The information provided on the Site and the Apps are not intended for distribution to or use by any person or entity in any jurisdiction or country where such distribution or use would be contrary to law or regulation or which would subject us to any registration requirement within such jurisdiction or country.

Accordingly, those persons who choose to access the Service from other locations do so on their own initiative and are solely responsible for compliance with local laws, if and to the extent local laws are applicable.

The Service is intended for users who are at least 18 years of age. All users who are minors in the jurisdiction in which they reside (generally under the age of 18) must have the permission of, and be directly supervised by, their parent or guardian to use the Service. If you are a minor, you must have your parent or guardian read and agree to these Terms of Service prior to you using the Service.

2. INTELLECTUAL PROPERTY RIGHTS

TRUTH Social is the "Big Tent" of social networking. TRUTH Social's codebase is free and open sourced, derived from the Mastodon project and licensed under the GNU Affero General Public License v. 3.0 (the "AGPLV3"). For more information, please see Legal Docs.

Unless otherwise indicated, the functionality, website designs, images, audio, video, text, photographs, graphics, and other content or material made available through the Service (collectively, the "Content") and the trademarks, service marks, and logos contained therein (the "Marks") are owned or controlled by us or licensed to us, and are protected by copyright and trademark laws and various other intellectual property rights and unfair competition laws of the United States, foreign jurisdictions, and international conventions.

The Content and the Marks are provided on the Site and the Apps "AS IS" for your information and personal use only. Except as expressly provided in these Terms of Service, no part of the Site or the Apps and no Content or Marks may be copied, reproduced, aggregated, republished, uploaded, posted, publicly displayed, encoded, translated, transmitted, distributed, sold, licensed, or otherwise exploited for any commercial purpose whatsoever, without our express prior written permission.

Provided that you are eligible to use the Service, you are granted a limited license to access and use the Service and to download or print a copy of any portion of the Content to which you have properly gained access (other than any video or other content made available through the Truth+ App, which may not be downloaded, reproduced, modified, redisplayed, retransmitted, or performed in any manner) solely for your personal, non-commercial use. We reserve all rights not expressly granted to you in and to the Service, the Site, the Apps, the Content and the Marks.

3. PRIVACY POLICY

We care about data privacy and security. We have developed a Privacy Policy in order to inform you of its practices with respect to the collection, use, disclosure and protection of your information. Please review our Privacy Policy at

https://help.truthsocial.com/legal/privacy-policy, which posted on the Site. You can also find it posted on the Apps. By using the Service, you agree to be bound by our Privacy Policy, which is incorporated into these Terms of Service. Please be advised the Site and the Apps are hosted in the United States.

If you access the Service from the European Union, Asia, or any other region of the world with laws or other requirements governing personal data collection, use, or disclosure that differ from applicable laws in the United States, then through your continued use of the Service, if applicable, you are transferring your data to the United States, and you expressly consent to have your data transferred to and processed in the United States. Please review our Data Privacy Policy (GDPR) as to data collection and processing for all users, including those outside the United States.

Further, we do not knowingly accept, request, target or solicit information from children or knowingly market to children. Therefore, in accordance with the U.S. Children's Online Privacy Protection Act, if we receive actual knowledge that anyone under the age of 18 has provided personal information to us without the requisite and verifiable parental consent, we will delete that information from the Site as quickly as is reasonably practical. To contact us: Please email us at legal@tmediatech.com and provide the username and other details as to any underage information.

4. USER REPRESENTATIONS

By using the Service, you represent and warrant that:

(1) all registration information you submit will be true, accurate, current, and complete;

(2) you will maintain the accuracy of such information and promptly update such registration information as necessary;

(3) you have the legal capacity and you agree to comply with these Terms of Service;

(4) you are not under the age of 18. The Service is intended for users who are at least 18 years of age. All users who are minors in the jurisdiction in which they reside (generally under the age of 18) must have the permission of, and be directly supervised by, their parent or guardian to use the Service. If you are a minor, you must have your parent or guardian read and agree to these Terms of Service prior to you using the Service;

(5) not a minor in the jurisdiction in which you reside, or if a minor, you have received parental permission to use the Site, if applicable;

(6) you will not access the Service through automated or non-human means, whether through a bot, script, or otherwise;

(7) you will not use the Service for any illegal or unauthorized purpose;

(8) your use of the Service will not violate any applicable law or regulation.

If you provide any information that is untrue, inaccurate, not current, or incomplete, we have the right to suspend or terminate your account and refuse any and all current or future use of the Service (or any portion thereof).

5. USER REGISTRATION

You may be required to register for the Service, by providing your name, date of birth, and email address as well as to create a username and password to set up your profile and your account. You agree to keep your password confidential, if applicable, and will be responsible for all use of your account and password. We reserve the right to remove, reclaim, or change a username you select if we determine, in our sole discretion, (a) that such username is inappropriate, obscene, or otherwise objectionable; (b) that such username is dormant, inactive or unused for an extended period of time; or (c) that such username is being used for user impersonation or username squatting which is a violation hereunder.

6. COMMUNICATION PREFERENCES AND CONSENT.

From time to time we may send you communications to the email address associated with your account or used to register for the Service. These communications may include, but are not limited to, information, new products and recommendations, special offers, and other account-related or transactional messages. These communications will also include consent request, opt-in and opt-out instructions. Also, when you register for the Service, you may receive SMS or text messages and communications from or related to this Service.

7. PROHIBITED ACTIVITIES

You may not access or use the Service for any purpose other than that for which we make the Service available.

As a user of the Service, you agree not to:

1. systematically retrieve data or other content from the Service to create or compile, directly or indirectly, a collection, compilation, database, or directory without written permission from us.

2. make any unauthorized use of the Service, including collecting usernames and/or email addresses of users by electronic or other means for the purpose of sending unsolicited email, or creating user accounts by automated means or under false pretenses.

3. use a buying agent, purchasing agent or other agent to make purchases or to upload content on the Site or the Apps.

4. use the Service to advertise or offer to sell goods and services in a manner that degrades the user experience, e.g., via off-topic replies to other users' Contributions, or that appears to be inconsistent with any applicable law, regulation, or professional standard.

5. circumvent, disable, or otherwise interfere with security-related features of the Service, including features that prevent or restrict the use or copying of any Content or enforce limitations on the use of the Service and/or the Content contained therein.

6. engage in unauthorized framing of or linking to the Service.

7. trick, defraud, or mislead us and other users, especially in any attempt to learn sensitive account information such as user passwords.

8. make improper use of our support services or submit false reports of abuse or misconduct.

9. engage in any automated use of the system, such as using scripts to send comments or messages, or using any data mining, robots, or similar data gathering and extraction tools.

10. interfere with, disrupt, or create an undue burden on the Service or the networks or other services connected to the Site or the Apps.

11. attempt to impersonate another user or person or use the username of another user of the Service.

12. sell or otherwise transfer your profile or account.

13. use any information obtained from the Service in order to harass, abuse, or harm another person.

14. use the Service as part of any effort to compete with us or otherwise use the Service and/or the Content for any revenue-generating endeavor or commercial enterprise.

15. decipher, decompile, disassemble, or reverse engineer any of the software comprising or in any way making up a part of the Service.

16. attempt to bypass any measures of the Service designed to prevent or restrict access to the Service, or any portion of the Service.

17. harass, , intimidate, or threaten any of our employees or agents engaged in providing any portion of the Service to you.

18. delete the copyright or other proprietary rights notice from any Content.

19. copy or adapt the Service's software, including but not limited to Flash, PHP, HTML, JavaScript, or other code.

20. upload or transmit (or attempt to upload or to transmit) viruses, Trojan horses, or other material, that interferes with any party's uninterrupted use and enjoyment of the Service or modifies, impairs, disrupts, alters, or interferes with the use, features, functions, operation, or maintenance of the Service.

21. upload or transmit (or attempt to upload or to transmit) any material that acts as a passive or active information collection or transmission mechanism, including without limitation, clear graphics interchange formats ("gifs"), 1×1 pixels, web bugs, cookies, or other similar devices (sometimes referred to as "spyware" or "passive collection mechanisms" or "pcms").

22. except as may be the result of standard search engine or Internet browser usage, use, launch, develop, or distribute any automated system, including without limitation, any spider, robot, cheat utility, scraper, or offline reader that accesses the Site, or using or launching any unauthorized script or other software.

23. infringe upon any copyright materials owned or controlled by others.

24. use the Service in a manner inconsistent with any applicable laws or regulations.

25. attempts to sell, buy, or solicit other forms of payment in exchange for usernames on the Site or Apps.

26. Post offensive or sexual content on the Site or Apps, including but not limited to:

    a. Sexual content or language;

    b. Content that includes sexual activity, sexual intercourse or any type of sexual act;

c. Any content that portrays or suggest explicit sexual acts or sexually suggestive positions or poses;

d. Sexually suggestive (explicit or vague) statements, texts or phrases; or

e. Content in which sexual acts are requested or offered, including pornography, prostitution, sugar babies, sex trafficking or sexual fetishes.

8. USER GENERATED CONTRIBUTIONS

The Service may invite you to post comments, post opinions, chat, contribute to, or participate in chats or blogs, message boards, online forums, and other functionality, and may provide you with the opportunity to create, submit, post, display, transmit, perform, publish, distribute, or broadcast content and materials to us or on the Service, including but not limited to text, writings, video, audio, photographs, graphics, comments, suggestions, or personal information or other material (collectively, "Contributions").

Contributions may be viewable by other users of the Site or the Apps and through third-party websites. As such, any Contributions you transmit may be treated as non-confidential and non-proprietary. When you create or make available any Contributions, you thereby represent and warrant that:

1. the creation, distribution, transmission, public display, or performance, and the accessing, downloading, or copying of your Contributions do not and will not infringe the proprietary rights, including but not limited to the copyright, patent, trademark, trade secret, or moral rights of any third party.

2. you are the creator and owner of or have the necessary licenses, rights, consents, releases, and permissions to use and to authorize us, the Service, and other users of the Service to use your Contributions in any manner contemplated by the Service and these Terms of Service.

3. you have the written consent, release, and/or permission of each and every identifiable individual person in your Contributions to use the name or likeness of each and every such identifiable individual person to enable inclusion and

use of your Contributions in any manner contemplated by the Service and these Terms of Service.

4. your Contributions are not false, inaccurate, or misleading.

5. your Contributions are not unsolicited or unauthorized advertising, promotional materials, pyramid schemes, chain letters, spam, mass mailings, or other forms of solicitation.

6. your Contributions are not obscene, lewd, lascivious, filthy, violent, harassing, libelous, slanderous, or otherwise objectionable.

7. your Contributions do not depict violence, threats of violence or criminal activity.

8. your Contributions do not advocate or incite, encourage, or threaten physical harm against another.

9. your Contributions do not violate any applicable law, regulation, or rule.

10. your Contributions do not violate the privacy or publicity rights of any third party.

11. your Contributions do not contain any material that solicits personal information from anyone under the age of 18 or exploits people under the age of 18 in a sexual or violent manner.

12. your Contributions do not violate any federal or state law concerning child pornography, or otherwise intended to protect the health or well-being of minors;

13. your Contributions do not otherwise violate, or link to material that violates, any provision of these Terms of Service, or any applicable laws, rules or regulations.

Any use of the Service in violation of the foregoing violates these Terms of Service and may result in, among other things, termination or suspension of your rights to

use the Service and removal or deletion of your Contributions.

9. CONTRIBUTION LICENSE

By posting your Contributions to any part of the Service or making Contributions accessible to the Service by linking your account from the Service to any of your social networking accounts, you automatically grant, and you represent and warrant that you have the right to grant, to us an unrestricted, unlimited, irrevocable, perpetual, non-exclusive, transferable, royalty-free, fully-paid, worldwide right, and license to host, use, copy, reproduce, disclose, sell, resell, publish, broadcast, retitle, archive, store, cache, publicly perform, publicly display, reformat, translate, transmit, excerpt (in whole or in part), and distribute such Contributions (including, without limitation, your image and voice) for any purpose, commercial, advertising, or otherwise, and to prepare derivative works of, or incorporate into other works, such Contributions, and grant and authorize sublicenses of the foregoing. The use and distribution may occur in any media formats and through any media channels.

This license will apply to any form, media, or technology now known or hereafter developed, and includes our use of your name, company name, and franchise name, as applicable, and any of the trademarks, service marks, trade names, logos, and personal and commercial images you provide.

We do not assert any ownership over your Contributions. You retain full ownership of all of your Contributions and any intellectual property rights or other proprietary rights associated with your Contributions. We are not liable for any statements or representations in your Contributions provided by you in any area on the Service.

You are solely responsible for your Contributions to the Service and you expressly agree to exonerate us from any and all responsibility and to refrain from any legal action against us regarding your Contributions. We do not support, endorse or guarantee the accuracy, truthfulness or reliability of any content or Contributions.

We have the right, in our sole and absolute discretion, (1) to edit, redact, or otherwise change any Contributions; (2) to re-categorize any Contributions to place them in more appropriate locations on the Site; and (3) to pre-screen or

delete any Contributions at any time and for any reason, without notice. We have no obligation to monitor your Contributions.

10. GUIDELINES FOR REVIEWS/RATINGS OR COMMENTS

We may provide you areas on the Service to leave reviews and ratings, post comments or replies or to otherwise communicate with other users of the Service ("Interactive Content"). When posting an Interactive Content, please use care and caution when posting or providing Interactive Content to other users. Additionally, you must comply with the following criteria:

(1) you should have firsthand experience with the person/entity being reviewed or Interactive Content being posted;

(2) your Interactive Content should not contain profanity, or abusive or racist, language;

(3) your Interactive Content should not contain discriminatory references based on religion, race, gender, national origin, age, marital status, sexual orientation, or disability;

(4) your Interactive Content should not contain references to any illegal activity;

(5) you should not be affiliated with competitors if posting negative reviews or negative Interactive Content;

(6) you should not make any conclusions as to the legality of conduct in your Interactive Content;

(7) you may not post any false, unlawful, threatening, defamatory, harassing or misleading statements;

(8) you may not post any indecent, , pornographic, profane, or other unlawful statements;

(9) you may not organize a campaign encouraging others to post Interactive Content or reviews, whether positive or negative.

We may accept, reject, or remove Interactive Content in our sole discretion. We have absolutely no obligation to screen Interactive Content or to delete Interactive, even if anyone considers reviews objectionable or inaccurate. Interactive Content is not endorsed or supported by us, and do not necessarily represent our opinions or the views of any of our affiliates or partners.

We do not assume liability for any Interactive Content or for any claims, liabilities, or losses resulting from any Interactive Content. By posting Interactive Content, you hereby grant to us a perpetual, non-exclusive, worldwide, royalty-free, fully-paid, assignable, and sublicensable right and license to reproduce, modify, translate, transmit by any means, display, perform, and/or distribute all content relating to Interactive Content.

11. MOBILE APPLICATION LICENSE

Use License

If you are using an App, then we grant you a revocable, non-exclusive, non-transferable, limited right to install and use the App on wire or wireless electronic devices owned or controlled by you, and to access and use the App on such devices strictly in accordance with the Terms of Service of the Applicense contained in these Terms of Service.

You shall not:

(1) decompile, reverse engineer, disassemble, attempt to derive the source code of, or decrypt the App;

(2) violate any applicable laws, rules, or regulations in connection with your access or use of the App;

(3) remove, alter, or obscure any proprietary notice (including any notice of copyright or trademark) posted by us or any licensors;

(4) use the App for any revenue generating endeavor, commercial enterprise, or other purpose for which it is not designed or intended;

(5) make the App available over a network or other environment permitting access or use by multiple devices or users at the same time;

(6) use the App for creating a product, service, or software that is, directly or indirectly, competitive with or in any way a substitute for the application;

(7) use the App to send automated queries to any website or to send any unsolicited commercial e-mail;

(9) use any proprietary information or any other intellectual property in the design, development, manufacture, licensing, or distribution of any applications, accessories, or devices for use with the App, without appropriate consent or license.

Apple and Android Devices

The following terms apply with respect to an App obtained from either the Apple Store or Google Play, if applicable, (each an "App Distributor"):

(1) the license granted to you for the App is limited to a non-transferable license to use the App on a device that utilizes the Apple iOS or Android operating systems, as applicable, and in accordance with the usage rules set forth in the applicable App Distributor's Terms of Service;

(2) we are responsible for providing any maintenance and support services with respect to the App as specified in these Terms of Service or as otherwise required under applicable law, and you acknowledge that each App Distributor has no obligation whatsoever to furnish any maintenance and support services with respect to the App;

(3) in the event of any failure of the App to conform to any applicable warranty, you may notify the applicable App Distributor, and the App Distributor, in accordance with its terms and policies, may refund the purchase price, if any, paid for the App, and to the maximum extent permitted by applicable law, the App Distributor will have no other warranty obligation whatsoever with respect to the App;

(4) you represent and warrant that (i) you are not located in a country that is subject to a U.S. government embargo, or that has been designated by the U.S. government as a "terrorist supporting" country and (ii) you are not listed on any U.S. government list of prohibited or restricted parties;

(5) you must comply with applicable third-party terms of agreement when using the App, e.g., if you have a VoIP application, then you must not be in violation of their wireless data service agreement when using the App;

6) you acknowledge and agree that the App Distributors are third-party beneficiaries of these Terms of Service, and that each App Distributor will have the right (and will be deemed to have accepted the right) to enforce these Terms of Service against you as a third-party beneficiary thereof.

12. SOCIAL MEDIA

As part of the functionality of the Service, you may link your account with online accounts you have with third-party service providers (each such account, a "Third-Party Account") by either: (1) providing your Third-Party Account login information through the Service; or (2) allowing us to access your Third-Party Account, as is permitted under the applicable Terms of Service that govern your use of each Third-Party Account.

You represent and warrant that you are entitled to disclose your Third-Party Account login information to us and/or grant us access to your Third-Party Account, without breach by you of any of the Terms of Service that govern your use of the applicable Third-Party Account, and without obligating us to pay any fees or making us subject to any usage limitations imposed by the third-party service provider of the Third-Party Account.

By granting us access to any Third-Party Accounts, you understand that (1) we may access, make available, and store (if applicable) any content that you have provided to and stored in your Third-Party Account (the "Social Network Content") so that it is available on and through the Service via your account, including without limitation any friend lists and (2) we may submit to and receive from your

Third-Party Account additional information to the extent you are notified when you link your account with the Third-Party Account.

Depending on the Third-Party Accounts you choose and subject to the privacy settings that you have set in such Third-Party Accounts, personally identifiable information that you post to your Third-Party Accounts may be available on and through your account on the Service.

Please note that if a Third-Party Account or associated service becomes unavailable or our access to such Third-Party Account is terminated by the third-party service provider, then Social Network Content may no longer be available on and through the Service. You will have the ability to disable the connection between your account on the Service and your Third-Party Accounts at any time.

PLEASE NOTE THAT YOUR RELATIONSHIP WITH THE THIRD-PARTY SERVICE PROVIDERS ASSOCIATED WITH YOUR THIRD-PARTY ACCOUNTS IS GOVERNED SOLELY BY YOUR AGREEMENT(S) WITH SUCH THIRD-PARTY SERVICE PROVIDERS.

We make no effort to review any Social Network Content for any purpose, including but not limited to, for accuracy, legality, or non-infringement, and we are not responsible for any Social Network Content.

You acknowledge and agree that we may access your email address book associated with a Third-Party Account and your contacts list stored on your mobile device or tablet computer solely for purposes of identifying and informing you of those contacts who have also registered to use the Service.

You can deactivate the connection between the Service and your Third-Party Account by contacting us using the contact information below or through your account settings (if applicable). We will delete any information stored on our servers that was obtained through such Third-Party Account, except the username and profile picture that become associated with your account.

13. SUBMISSIONS

You acknowledge and agree that any questions, comments, suggestions, ideas, feedback, or other information regarding the Service provided by you to us ("Submissions") are non-confidential and shall become our sole property. We shall own exclusive rights, including all intellectual property rights, and shall be entitled to the unrestricted use and dissemination of these Submissions for any lawful purpose, commercial or otherwise, without acknowledgment or compensation to you.

You hereby waive all moral rights to any such Submissions, and you hereby warrant that any such Submissions are original with you or that you have the right to submit such Submissions. You agree there shall be no recourse against us for any alleged or actual infringement or misappropriation of any proprietary right in your Submissions.

14. THIRD-PARTY WEBSITES AND CONTENT

The Service may contain (or you may be sent via the Service) links to other websites ("Third-Party Websites") as well as articles, photographs, text, graphics, pictures, designs, music, sound, video, information, applications, software, and other content or items belonging to or originating from third parties ("Third-Party Content").

Such Third-Party Websites and Third-Party Content are not investigated, monitored, or checked for accuracy, appropriateness, or completeness by us, and we are not responsible for any Third-Party Websites accessed through the Service or any Third-Party Content posted on, available through, or installed from the Service, including the content, accuracy, offensiveness, opinions, reliability, privacy practices, or other policies of or contained in the Third-Party Websites or the Third-Party Content.

Inclusion of, linking to, or permitting the use or installation of any Third-Party Websites or any Third-Party Content does not imply approval or endorsement thereof by us. If you decide to leave the Service and access the Third-Party Websites or to use or install any Third-Party Content, you do so at your own risk, and you should be aware these Terms of Service no longer govern.

You should review the applicable terms and policies, including privacy and data gathering practices, of any website to which you navigate from the Service or relating to any applications you use or install from the Service. Any purchases you make through Third-Party Websites will be through other websites and from other companies, and we take no responsibility whatsoever in relation to such purchases which are exclusively between you and the applicable third party.

You agree and acknowledge that we do not endorse the products or services offered on Third-Party Websites and you shall hold us harmless from any harm caused by your purchase of such products or services. Additionally, you shall hold us harmless from any losses sustained by you or harm caused to you relating to or resulting in any way from any Third-Party Content or any contact with Third-Party Websites.

15. ADVERTISERS

From time to time, we may allow advertisers to display their advertisements and other information in certain areas of the Service, such as sidebar advertisements or banner advertisements. If you are an advertiser, you shall take full responsibility for any advertisements you place on the Service and any services provided on the Service or products sold through those advertisements.

Further, as an advertiser, you warrant and represent that you possess all rights and authority to place advertisements on the Service, including, but not limited to, intellectual property rights, publicity rights, and contractual rights.

As an advertiser, you agree that such advertisements are subject to our Digital Millennium Copyright Act ("DMCA") Notice and Policy provisions as described below, and you understand and agree there will be no refund or other compensation for DMCA takedown-related issues. We simply provide the space to place such advertisements, and we have no other relationship with advertisers.

16. MONITORING AND RESTRICTIONS

We reserve the right, but not the obligation, to:

(1) monitor the Service for violations of these Terms of Service;

(2) take appropriate legal action against anyone who, in our sole discretion, violates the law or these Terms of Service, including without limitation, reporting such user to law enforcement authorities;

(3) in our sole discretion and without limitation, refuse, restrict access to, limit the availability of, or disable (to the extent technologically feasible) any of your Contributions or any portion thereof;

(4) in our sole discretion and without limitation, notice, or liability, to remove from the Service or otherwise disable all files and content that are excessive in size or are in any way burdensome to our systems;

(5) otherwise manage the Service in a manner designed to protect our rights and property and to facilitate the proper functioning of the Service.

17. DIGITAL MILLENNIUM COPYRIGHT ACT (DMCA) NOTICE AND POLICY

A. Notifications

We respect the intellectual property rights of others. If you believe that any material available on or through the Service infringes upon any copyright you own or control, please immediately notify our Designated Copyright Agent using the contact information provided below (a "Notification").

A copy of your Notification may be sent to the person who posted or stored the material addressed in the Notification. Please be advised that pursuant to federal law you may be held liable for damages if you make material misrepresentations in a Notification. Thus, if you are not sure that material located on or linked to by the Service infringes your copyright, you should consider first contacting an attorney.

All Notifications should meet the requirements of DMCA 17 U.S.C. § 512(c)(3) and include the following information:

(1) A physical or electronic signature of a person authorized to act on behalf of the owner of an exclusive right that is allegedly infringed;

(2) identification of the copyrighted work claimed to have been infringed, or, if multiple copyrighted works on the Service are covered by the Notification, a representative list of such works on the Service;

(3) identification of the material that is claimed to be infringing or to be the subject of infringing activity and that is to be removed or access to which is to be disabled, and information reasonably sufficient to permit us to locate the material;

(4) information reasonably sufficient to permit us to contact the complaining party, such as an address, telephone number, and, if available, an email address at which the complaining party may be contacted;

(5) a statement that the complaining party has a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law;

(6) a statement that the information in the notification is accurate, and under penalty of perjury, that the complaining party is authorized to act on behalf of the owner of an exclusive right that is allegedly infringed upon.

Attn: Copyright Agent

Email: **legal@tmediatech.com**

B. Counter Notification

If you believe your own copyrighted material has been removed from the Site as a result of a mistake or misidentification, you may submit a written counter notification to [us/our Designated Copyright Agent] using the contact information provided below (a "Counter Notification").

To be an effective Counter Notification under the DMCA, your Counter Notification must include substantially the following:

(1) identification of the material that has been removed or disabled and the location at which the material appeared before it was removed or disabled;

(2) a statement that you consent to the jurisdiction of the Federal District Court in which your address is located, or if your address is outside the United States, for any judicial district in which we are located;

(3) a statement that you will accept service of process from the party that filed the Notification or the party's agent;

(4) your name, address, and telephone number;

(5) a statement under penalty of perjury that you have a good faith belief that the material in question was removed or disabled as a result of a mistake or misidentification of the material to be removed or disabled;

(6) your physical or electronic signature.

If you send us a valid, written Counter Notification meeting the requirements described above, we will restore your removed or disabled material, unless we first receive notice from the party filing the Notification informing us that such party has filed a court action to restrain you from engaging in infringing activity related to the material in question.

Please note that if you materially misrepresent that the disabled or removed content was removed by mistake or misidentification, you may be liable for damages, including costs and attorney's fees. Filing a false Counter Notification constitutes perjury.

Attn: Copyright Agent

Email: **legal@tmediatech.com**

18. COPYRIGHT INFRINGEMENTS

We respect the intellectual property rights of others. If you believe that any material available on or through the Service infringes upon any copyright you own

or control, please immediately notify us using the contact information provided below (a "Notification"). A copy of your Notification may be sent to the person who posted or stored the material addressed in the Notification.

Please be advised that pursuant to federal law you may be held liable for damages if you make material misrepresentations in a Notification. Thus, if you are not sure that material located on or linked to by the Service infringes your copyright, you should consider first contacting an attorney.

19. TERM AND TERMINATION

These Terms of Service shall remain in full force and effect while you use the Service. **WITHOUT LIMITING ANY OTHER PROVISION OF THESE TERMS OF SERVICE, WE RESERVE THE RIGHT TO, IN OUR SOLE DISCRETION AND WITHOUT NOTICE OR LIABILITY, DENY ACCESS TO AND USE OF THE SERVICE (INCLUDING BLOCKING CERTAIN IP ADDRESSES) AND/OR ANY CONTENT PROVIDED THEREBY, TO ANY PERSON FOR ANY REASON OR FOR NO REASON, INCLUDING WITHOUT LIMITATION FOR BREACH OF ANY REPRESENTATION, WARRANTY, OR COVENANT CONTAINED IN THESE TERMS OF SERVICE OR OF ANY APPLICABLE LAW OR REGULATION. WE MAY TERMINATE YOUR USE OR PARTICIPATION IN THE SERVICE OR DELETE YOUR ACCOUNT AND ANY CONTENT OR INFORMATION THAT YOU POSTED AT ANY TIME, WITHOUT WARNING, IN OUR SOLE DISCRETION.**

If we terminate or suspend your account for any reason, you are prohibited from registering and creating a new account under your name, a fake or borrowed name, or the name of any third party, even if you may be acting on behalf of the third party.

In addition to terminating or suspending your account, we reserve the right to take appropriate legal action, including without limitation pursuing civil, criminal, and injunctive redress.

20. MODIFICATIONS AND INTERRUPTIONS

We reserve the right to change, modify, or remove the contents of the Service at any time or for any reason at our sole discretion without notice. However, we have no obligation to update any information on our Service. We also reserve the right to modify or discontinue all or part of the Service without notice at any time.

We will not be liable to you or any third party for any modification, price change, suspension, or discontinuance of the Service or any Content.

We cannot guarantee the Service or any Content will be available at all times. We may experience hardware, software, or other problems or need to perform maintenance related to the Service, resulting in interruptions, delays, or errors.

We reserve the right to change, revise, update, suspend, discontinue, or otherwise modify the Service or any Content at any time or for any reason without notice to you. You agree that we have no liability whatsoever for any loss, damage, or inconvenience caused by your inability to access or use the Site during any downtime or discontinuance of the Service or any Content.

Nothing in these Terms of Service will be construed to obligate us to maintain and support the Service or to supply any corrections, updates, or releases in connection therewith.

21. GOVERNING LAW

These Terms of Service and your use of the Service or receipt of Content are governed by and construed in accordance with the laws of the State of Florida applicable to agreements made and to be entirely performed within the State of Florida, without regard to its conflict of law principles.

22. DISPUTE RESOLUTION

ANY DISPUTE, CONTROVERSY OR CLAIM YOU HAVE ARISING OUT OF OR RELATED TO THESE TERMS OF SERVICE, A BREACH THEREOF OR YOUR USE OF THE SERVICE OR RECEIPT OR CONTENT SHALL BE EXCLUSIVELY SUBMITTED AND DECIDED BY BINDING ARBITRATION ADMINISTERED BY THE AMERICAN ARBITRATION ASSOCIATION ("AAA"). ANY LEGAL ACTION OF WHATEVER

NATURE BROUGHT BY US AGAINST YOU MAY BE COMMENCED OR PROSECUTED IN THE STATE AND FEDERAL COURTS LOCATED IN SARASOTA COUNTY, FLORIDA, AND YOU HEREBY CONSENT TO SAME, AND WAIVE ALL DEFENSES OF LACK OF PERSONAL JURISDICTION AND FORUM NON CONVENIENS WITH RESPECT TO VENUE AND JURISDICTION IN SUCH STATE AND FEDERAL COURTS.

23. WAIVER OF CLASS ACTION

NOTWITHSTANDING ANYTHING CONTAINED HEREIN, YOU AGREE TO ABSOLUTELY AND UNCONDITIONALLY WAIVE ANY AND ALL RIGHTS TO PARTICIPATE IN OR TO BE INCLUDED IN ANY CLASS ACTION LAWSUITS OR INCLUSION IN ANY MULTI-PARTY ACTIONS OR SUITS AGAINST US, ANY OF OUR AFFILIATES, SPONSORS, SUBSIDIARIES, VENDORS, EMPLOYEES, AGENTS OR ANY OTHER PERSON OR ENTITY ASSOCIATED THEREWITH.

24. CORRECTIONS

There may be information on the Service that contains typographical errors, inaccuracies, or omissions that may relate to the Service, including descriptions, pricing, availability, and various other information. We reserve the right to correct any errors, inaccuracies, or omissions and to change or update the information on the Service at any time, without prior notice.

25. DISCLAIMER

THE SERVICE AND CONTENT ARE PROVIDED ON AN AS-IS AND AS-AVAILABLE BASIS. YOU AGREE THAT YOUR USE OF THE SERVICE AND ITS CONTENT WILL BE AT YOUR SOLE RISK. TO THE FULLEST EXTENT PERMITTED BY LAW, WE DISCLAIM ALL WARRANTIES, EXPRESS OR IMPLIED, IN CONNECTION WITH THE SERVICE, THE CONTENT, AND YOUR USE THEREOF, INCLUDING, WITHOUT LIMITATION, THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, AND NON-INFRINGEMENT. WE MAKE NO WARRANTIES OR REPRESENTATIONS ABOUT THE ACCURACY OR COMPLETENESS OF THE SERVICE'S CONTENT OR THE CONTENT OF ANY WEBSITES LINKED TO THE

SERVICE AND WE WILL ASSUME NO LIABILITY OR RESPONSIBILITY FOR ANY (1) ERRORS, MISTAKES, OR INACCURACIES OF CONTENT AND MATERIALS, (2) PERSONAL INJURY OR PROPERTY DAMAGE, OF ANY NATURE WHATSOEVER, RESULTING FROM YOUR ACCESS TO AND USE OF THE SERVICE, (3) ANY UNAUTHORIZED ACCESS TO OR USE OF OUR SECURE SERVERS AND/OR ANY AND ALL PERSONAL INFORMATION AND/OR FINANCIAL INFORMATION STORED THEREIN, (4) ANY INTERRUPTION OR CESSATION OF TRANSMISSION TO OR FROM THE SERVICE, (5) ANY BUGS, VIRUSES, TROJAN HORSES, OR THE LIKE WHICH MAY BE TRANSMITTED TO OR THROUGH THE SERVICE BY ANY THIRD PARTY, AND/OR (6) ANY ERRORS OR OMISSIONS IN ANY CONTENT AND MATERIALS OR FOR ANY LOSS OR DAMAGE OF ANY KIND INCURRED AS A RESULT OF THE USE OF ANY CONTENT POSTED, TRANSMITTED, OR OTHERWISE MADE AVAILABLE VIA THE SERVICE. WE DO NOT WARRANT, ENDORSE, GUARANTEE, OR ASSUME RESPONSIBILITY FOR ANY PRODUCT OR SERVICE ADVERTISED OR OFFERED BY A THIRD PARTY THROUGH THE SERVICE, ANY HYPERLINKED WEBSITE, OR ANY WEBSITE OR MOBILE APPLICATION FEATURED IN ANY BANNER OR OTHER ADVERTISING, AND WE WILL NOT BE A PARTY TO OR IN ANY WAY BE RESPONSIBLE FOR MONITORING ANY TRANSACTION BETWEEN YOU AND ANY THIRD-PARTY PROVIDERS OF PRODUCTS OR SERVICES. AS WITH THE PURCHASE OF A PRODUCT OR SERVICE THROUGH ANY MEDIUM OR IN ANY ENVIRONMENT, YOU SHOULD USE YOUR BEST JUDGMENT AND EXERCISE CAUTION WHERE APPROPRIATE.

26. LIMITATIONS OF LIABILITY

IN NO EVENT WILL WE OR OUR DIRECTORS, EMPLOYEES, OR AGENTS BE LIABLE TO YOU OR ANY THIRD PARTY FOR ANY DIRECT, INDIRECT, CONSEQUENTIAL, EXEMPLARY, INCIDENTAL, SPECIAL, OR PUNITIVE DAMAGES, INCLUDING LOST PROFIT, LOST REVENUE, LOSS OF DATA, OR OTHER DAMAGES ARISING FROM YOUR USE OF THE SERVICE OR CONTENT, EVEN IF WE HAVE BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES.

NOTWITHSTANDING ANYTHING TO THE CONTRARY CONTAINED HEREIN, OUR LIABILITY TO YOU FOR ANY CAUSE WHATSOEVER AND REGARDLESS OF THE FORM OF THE ACTION, WILL AT ALL TIMES BE LIMITED TO THE LESSER OF THE

AMOUNT PAID, IF ANY, BY YOU TO US DURING THE ONE MONTH PERIOD PRIOR TO ANY CAUSE OF ACTION ARISING OR $0.01. CERTAIN STATE LAWS DO NOT ALLOW LIMITATIONS ON IMPLIED WARRANTIES OR THE EXCLUSION OR LIMITATION OF CERTAIN DAMAGES.

27. INDEMNIFICATION

You agree to defend, indemnify, and hold us harmless, including our subsidiaries, affiliates, and all of our respective officers, agents, partners, and employees, from and against any loss, damage, liability, claim, or demand, including reasonable attorneys' fees and expenses, made by any third party due to or arising out of: (1) your Contributions; (2) use of the Service or Content; (3) breach of these Terms of Service; (4) any breach of your representations and warranties set forth in these Terms of Service; (5) your violation of the rights of a third party, including but not limited to intellectual property rights; or (6) any overt harmful act toward any other user of the Service with whom you connected via the Service.

Notwithstanding the foregoing, we reserve the right, at your expense, to assume the exclusive defense and control of any matter for which you are required to indemnify us, and you agree to cooperate, at your expense, with our defense of such claims. We will use reasonable efforts to notify you of any such claim, action, or proceeding which is subject to this indemnification upon becoming aware of it.

28. USER DATA

We will maintain certain data that you transmit to the Service for the purpose of managing the Service, as well as data relating to your use of the Service. Although we perform regular routine backups of data, you are solely responsible for all data that you transmit or that relates to any activity you have undertaken using the Service.

You agree that we shall have no liability to you for any loss or corruption of any such data, and you hereby waive any right of action against us arising from any such loss or corruption of such data.

29. ELECTRONIC COMMUNICATIONS, TRANSACTIONS, AND SIGNATURES

Visiting the Service, creating a Profile or an Account, registering as a User, sending us emails, and completing online forms constitute electronic communications. You consent to receive electronic communications, and you agree that all agreements, notices, disclosures, and other communications we provide to you electronically, via email and on the Service, satisfy any legal requirement that such communication be in writing.

YOU HEREBY AGREE TO THE USE OF ELECTRONIC SIGNATURES, CONTRACTS, ORDERS, AND OTHER RECORDS, AND TO ELECTRONIC DELIVERY OF NOTICES, POLICIES, AND RECORDS OF TRANSACTIONS INITIATED OR COMPLETED BY US OR VIA THE SERVICE.

You hereby waive any rights or requirements under any statutes, regulations, rules, ordinances, or other laws in any jurisdiction which require an original signature or delivery or retention of non-electronic records, or to payments or the granting of credits by any means other than electronic means.

30. PAID SERVICES

All fees and charges are non-refundable, including for unused portions of cancelled subscriptions. Subscriptions will be charged automatically, at the frequency (monthly or yearly) specified when you subscribe. We reserve the right to change the pricing of all Services at any time. In the event of a price change, we will post the new pricing on the relevant Service and attempt to notify you by sending an email to the address you have registered. We may offer promotional periods to fee-based subscriptions or services for free or at special discounted prices. Unless otherwise stated, these promotional periods will automatically become paying subscriptions at the posted subscription rate if you do not cancel before the end of the trial period.

Applicable federal, state and local taxes will apply to subscriptions (both monthly and annual). We will not be able to notify you of any changes in applicable taxes.

You are responsible for all third-party Internet access charges and taxes in connection with your use of the Services. Please check with your Internet provider for information on possible Internet data usage charges.

31. CALIFORNIA USERS AND RESIDENTS

If any complaint with us is not satisfactorily resolved, you can contact the Complaint Assistance Unit of the Division of Consumer Services of the California Department of Consumer Affairs in writing at 1625 North Market Blvd., Suite N 112, Sacramento, California 95834 or by telephone at (800) 952-5210 or (916) 445-1254.

32. MISCELLANEOUS

These Terms of Service and any policies or operating rules posted by us on the Service, including privacy policies, constitute the entire agreement and understanding between you and us. Our failure to exercise or enforce any right or provision of these Terms of Service shall not operate as a waiver of such right or provision.

These Terms of Service operate to the fullest extent permissible by law. We may assign any or all of our rights and obligations to others at any time. We shall not be responsible or liable for any loss, damage, delay, or failure to act caused by any cause beyond our reasonable control.

If any provision or part of a provision of these Terms of Service is determined to be unlawful, void, or unenforceable, that provision or part of the provision is deemed severable from these Terms of Service and does not affect the validity and enforceability of any remaining provisions.

There is no joint venture, partnership, employment or agency relationship created between you and us as a result of these Terms of Service or use of the Service. You agree that these Terms of Service will not be construed against us by virtue of having drafted them.

You hereby waive any and all defenses you may have based on the electronic form of these Terms of Service and the lack of signing by the parties hereto to execute these Terms of Service.

33. CONTACT US

In order to resolve a complaint regarding the Service or any Content or to receive further information regarding use of the Service or Content, please contact us at **support@truthsocial.com.** Users may report "hateful conduct," as defined by New York law, to **legal@tmediatech.com**.

34. SMS Terms and Conditions

Our collection and use of your personal information is also subject to our Privacy Policy. By signing up, you accept and agree to these Mobile Messaging Terms and our Privacy Policy.

1. We may send promotional and transactional mobile messages in various formats (“Program”). Promotional messages advertise, promote, and provide updates on our products and services. Message frequency will vary. You agree that we, and any third-party service providers, may send you messages regarding the foregoing topics or any topic and that such messages may be made or placed using different telephone numbers or short codes. We do not charge for mobile messages sent but you are responsible for any message and data rates imposed by your mobile provider, as standard data and message rates may apply for short message service and multimedia message alerts.
2. User Opt-In: By providing your mobile phone number to us, you are voluntarily opting into the Service and you agree to receive recurring mobile messages from us at the mobile phone number associated with your opt-in, even if such number is registered on any state or federal “Do Not Call” list. You agree that any mobile phone number you provide us is a valid mobile phone number of which you are the owner or authorized user. Your participation in the Service is completely voluntary.
3. User Opt-Out and Support: You may opt-out of receiving messages at any time. If you wish to opt out of and stop receiving mobile messages from us, or

you no longer agree to these Mobile Messaging Terms, reply STOP, QUIT, CANCEL, OPT-OUT, and/or UNSUBSCRIBE to any mobile message from us. You may receive a one-time opt-out confirmation message. You understand and agree that the foregoing is the only reasonable method of opting out. For support, reply HELP to any mobile message from us. Our mobile messaging platform will only recognize the foregoing commands and you agree that we and our service providers will not be liable for failing to honor requests that do not comply with the requirements in these Mobile Messaging Terms. We may also change the telephone number or short code we use to operate the Program and we will notify you of any such change. You acknowledge that any requests sent to a telephone number or short code that has been changed may not be received by us and we will not be responsible for failing to honor a request sent to a telephone number or short code that has been changed.

4. Disclaimer of Warranty and Liability: Updates provided by mobile messaging is offered on an “as-is” basis and may not be available in all areas, at all times, or on all mobile providers. You agree that neither we nor our service providers will be liable for any failed, delayed, or misdirected delivery of any mobile message or information sent through the Program.
5. Modifications: We may modify or cancel these updates or any of its features at any time, with or without notice. To the extent permitted by applicable law, we may also modify these Mobile Messaging Terms at any time. Any such modification will take effect when it is posted to our website. You agree to review these Mobile Messaging Terms periodically to ensure that you are aware of any modifications. Your continued participation in the Program will constitute your acceptance to these modifications.

Contact Support Brand & Press System Status ©2026 Truth Social

Case No. 1:26-cv-815 (JEB)

EXHIBIT 6

EARLY NEWS
LISTEN LIVE
MY PLAYLIST
WNYC
On Air Now
why
DONATE

TECHNOLOGY

State Department to deny visas to fact checkers and others, citing 'censorship'

DECEMBER 4, 2025 · 5:22 PM ET



Shannon Bond



The Harry S. Truman Federal Building, headquarters of the U.S. Department of State, in a 2024 file photo.
Kevin Dietsch/Getty Images

The State Department is instructing its staff to reject visa applications from people who worked on fact-checking, content moderation or other activities the Trump administration considers "censorship" of Americans' speech.

The directive, sent in an internal memo on Tuesday, is focused on applicants for H-1B visas for highly skilled workers, which are frequently used by tech companies, among other sectors. The memo was first reported by Reuters; NPR also obtained a copy.

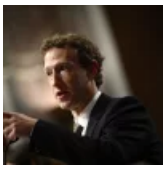


POLITICS

A White House order claims to end 'censorship.' What does that mean?

"If you uncover evidence an applicant was responsible for, or complicit in, censorship or attempted censorship of protected expression in the United States, you should pursue a finding that the applicant is ineligible" for a visa, the memo says. It refers to a policy announced by Secretary of State Marco Rubio in May restricting visas from being issued to "foreign officials and persons who are complicit in censoring Americans."

The Trump administration has been highly critical of tech companies' efforts to police what people are allowed to post on their platforms and of the broader field of trust and safety, the tech industry's term for teams that focus on preventing abuse, fraud, illegal content, and other harmful behavior online.



UNTANGLING DISINFORMATION

Meta says it will end fact-checking as Silicon Valley prepares for Trump

President Trump was banned from multiple social media platforms in the aftermath of his supporters' attack on the Capitol on Jan. 6, 2021. While those bans have since been lifted, the president and members of his administration frequently cite that experience as evidence for their claims that tech companies unfairly target conservatives — even as many tech leaders have eased their policies in the face of that backlash.



UNTANGLING DISINFORMATION

A major disinformation research team's future is uncertain after political attacks

Tuesday's memo calls out H-1B visa applicants in particular "as many work in or have worked in the tech sector, including in social media or financial services companies involved in the suppression of protected expression."

It directs consular officers to "thoroughly explore" the work histories of applicants, both new and returning, by reviewing their resumes, LinkedIn profiles, and appearances in media articles for activities including combatting misinformation, disinformation or false narratives, fact-checking, content moderation, compliance, and trust and safety.



NATIONAL

U.S. will review social media for foreign student visa applications

"I'm alarmed that trust and safety work is being conflated with 'censorship'," said Alice Goguen Hunsberger, who has worked in trust and safety at tech companies including OpenAI and Grindr.

"Trust and safety is a broad practice which includes critical and life-saving work to protect children and stop CSAM [child sexual abuse material], as well as preventing fraud, scams, and sextortion. T&S workers are focused on making the internet a safer and better place, not censoring just for the sake of it," she said. "Bad actors that target Americans come from all over the world and it's so important to have people who understand different languages and cultures on trust and safety teams — having global workers at tech companies in [trust and safety] absolutely keeps Americans safer."

In a statement, a State Department spokesperson who declined to give their name said the department does not comment on "allegedly leaked documents," but added: "the Administration has made clear that it defends Americans' freedom of expression against foreigners who wish to censor them. We do not support aliens coming to the United States to work as censors muzzling Americans."

The statement continued: "In the past, the President himself was the victim of this kind of abuse when social media companies locked his accounts. He does not want other Americans to suffer this way. Allowing foreigners to lead this type of censorship would both insult and injure the American people."

First Amendment experts criticized the memo's guidance as itself a potential violation of free speech rights.

"People who study misinformation and work on content-moderation teams aren't engaged in 'censorship'— they're engaged in activities that the First Amendment was designed to protect. This policy is incoherent and unconstitutional," said Carrie DeCell, senior staff attorney and legislative advisor at the Knight First Amendment Institute at Columbia University, in a statement.

Even as the administration has targeted those it claims are engaged in censoring Americans, it has also tightened its own scrutiny of visa applicants' online speech.

On Wednesday, the State Department announced it would require H-1B visa applicants and their dependents to set their social media profiles to "public" so they can be reviewed by U.S. officials.

NPR's Bobby Allyn and Michele Kelemen contributed reporting.

u.s. department of state online safety social media

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EXHIBIT 7

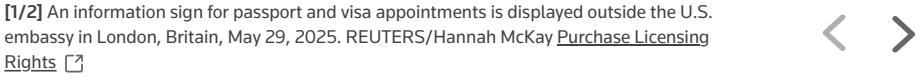
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Exclusive: Trump administration orders enhanced vetting for applicants of H-1B visa

By **Humeyra Pamuk**

December 4, 2025 11:53 AM EST · Updated December 4, 2025





[1/2] An information sign for passport and visa appointments is displayed outside the U.S. embassy in London, Britain, May 29, 2025. REUTERS/Hannah McKay Purchase Licensing Rights

Summary

- U.S. diplomats asked to review H-1B visa applicants' LinkedIn profiles
- Washington says H-1B visa applicants, others should not have engaged in "censorship"
- H-1B visas are crucial for the tech companies, many of whose leaders supported Trump

WASHINGTON, Dec 3 (Reuters) - The Trump administration on Wednesday announced increased vetting of applicants for H-1B visas for highly skilled workers, with an internal State Department memo saying that anyone involved in "censorship" of free speech be considered for rejection.

H-1B visas, which allow U.S. employers to hire foreign workers in specialty fields, are crucial for U.S. tech companies which recruit heavily from countries including India and China. Many of those companies' leaders threw their support behind Trump in the last presidential election.

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The cable, sent to all U.S. missions on December 2, orders U.S. consular officers to review resumes or LinkedIn profiles of H-1B applicants - and family members who would

be traveling with them - to see if they have worked in areas that include activities such as misinformation, disinformation, content moderation, fact-checking, compliance and online safety, among others.

"If you uncover evidence an applicant was responsible for, or complicit in, censorship or attempted censorship of protected expression in the United States, you should pursue a finding that the applicant is ineligible," under a specific article of the Immigration and Nationality Act, the cable said.

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Details on the enhanced vetting for H-1B visas, including the focus on censorship and free speech, have not been previously reported.

The cable said all visa applicants were subject to this policy, but sought a heightened review for the H-1B applicants given they frequently worked in the technology sector "including in social media or financial services companies involved in the suppression of protected expression."

"You must thoroughly explore their employment histories to ensure no participation in such activities," the cable said.

The new vetting requirements apply to both new and repeat applicants.

"We do not support aliens coming to the United States to work as censors muzzling Americans," a State Department spokesperson said, but added that it does not comment on "allegedly leaked documents."

00:01 00:16

"In the past, the President himself was the victim of this kind of abuse when social media companies locked his accounts. He does not want other Americans to suffer this way. Allowing foreigners to lead this type of censorship would both insult and injure the American people," the spokesperson said.

The Trump administration has made free speech, particularly what it sees as the stifling of conservative voices online, a focus of its foreign policy.

Officials have repeatedly weighed in on European politics to denounce what they say is suppression of right-wing politicians, including in Romania, Germany and France, accusing European authorities of censoring views like criticism of immigration in the name of countering disinformation.

In May, Rubio threatened visa bans for people who censor speech by Americans, including on social media, and suggested the policy could target foreign officials regulating U.S. tech companies.

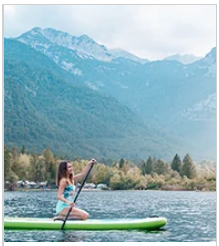
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The Trump administration has already significantly tightened its vetting of applicants for student visas, ordering U.S. consular officers to screen for any social media posts that may be hostile towards the United States.

As part of his wide-ranging crackdown on immigration, Trump in September imposed new fees on H-1B visas.

Trump and his Republican allies have repeatedly accused the administration of Democratic former President Joe Biden of encouraging suppression of free speech on online platforms, claims that have centered on efforts to stem false claims about vaccines and elections.

Reporting by Humeyra Pamuk; Editing by Don Durfee and Stephen Coates

Our Standards: **The Thomson Reuters Trust Principles.**

Suggested Topics: United States | Civil Rights | Immigration | Employment

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Humeyra Pamuk
Thomson Reuters

Humeyra Pamuk is a senior foreign policy correspondent based in Washington DC. She covers the U.S. State Department, regularly traveling with U.S. Secretary of State. During her 20 years with Reuters, she has had postings in London, Dubai, Cairo and Turkey, covering everything from the Arab Spring and Syria's civil war to numerous Turkish elections and the Kurdish insurgency in the southeast. In 2017, she won the Knight-Bagehot fellowship program at Columbia University's School of Journalism. She holds a BA in International Relations and an MA on European Union studies.

Read Next

Case No. 1:26-cv-815 (JEB)

EXHIBIT 8

Democracy Dies in Darkness

Inside the Trump administration's campaign to counter content bans in Europe

The United States has banned some European researchers from entering the country and dismantled federal programs intended to fight foreign disinformation campaigns.

Updated March 20, 2026

By Naomi Nix and Ian Duncan

In early 2025, aides to Vice President JD Vance ordered a small office at the State Department to document how European regulators were censoring online speech.

Staffers launched an investigation focusing on the European Union's Digital Services Act, a sweeping 2022 social media law requiring large tech companies to limit the spread of harmful or illegal speech on the continent.

The weeks-long investigation, details of which have not previously been reported, uncovered no records indicating censorship, according to two people familiar with the matter, who spoke on the condition of anonymity for fear of retribution.

"There is no evidence that Member States of the European Union are overreaching the DSA to censor and criminalize online content," they wrote in conclusion.

Despite the finding, the Trump administration has pressed ahead with a wide-ranging State Department effort to crack down on what it alleges is widespread censorship in the E.U., according to documents reviewed by The Post and nine people involved or aware of the campaign, many of whom spoke on the condition of anonymity to protect their livelihoods.

It has banned some European researchers from entering the United States and dismantled federal programs intended to fight foreign disinformation campaigns. Behind the scenes, the administration has crafted a plan to allow American tech companies to skirt European rules, using the federal government's powers to control exports, according to two of the people and documents.

The department is preparing to launch a tool to allow people to "access the open Internet as Americans experience it." A teaser for the site, freedom.gov, includes a mounted Paul Revere-type figure galloping over the words "Freedom is coming."

Vance's office did not respond to a request for comment before this article was published. After the article was published, his office denied ordering the report.

The push has refocused the State Department's agenda — which traditionally emphasized global free expression, particularly in authoritarian states — to prioritize fighting censorship by European governments.

The State Department said in a statement that it has been consistent in raising concerns about the Digital Services Act and a similar British law and had "never 'concluded' anything to the contrary."

Sarah Rogers, the department's undersecretary for public diplomacy, told "The Charlie Kirk Show" in October that her predecessors had panicked in the face of growing access to information online and responded by attempting to censor it.

"It is my job to hold out to the world what America's values and priorities are," Rogers said. "They aren't censorship anymore. ... They are America First. America's crown jewel value ... is free speech."

Reuters previously reported on the administration's plans for a freedom of expression website.

The Trump administration's effort echoes a years-long campaign in the United States, where Republicans have accused tech companies, researchers and the Biden administration of conspiring to stifle conservative views online. While a lawsuit alleging government censorship of social media petered out at the Supreme Court in 2024, the push has nonetheless succeeded in persuading some leading platforms to relax their policies, and some independent research groups have pulled back or disbanded in the face of legal and political pressure.

President Donald Trump's return to the White House has supercharged the effort and expanded it overseas. The administration alleges that European tech laws that censor content are part of a broader cultural shift with immigration and declining birth rates that put the continent at risk of "civilizational erasure."

"American diplomacy should continue to stand up for genuine democracy, freedom of expression, and unapologetic celebrations of European nations' individual character and history," the administration wrote in its December national security strategy. "America encourages its political allies in Europe to promote this revival of spirit."

Administration officials highlighted groups including the German organization HateAid, which supports victims of online abuse and backs efforts for online attacks to be classified as "digital violence."

Josephine Ballon, the group's chief executive, learned just before Christmas that she had been banned from entering the United States. The State Department issued the ban on the grounds that Ballon and others "led organized efforts to coerce American platforms to censor, demonetize, and suppress American viewpoints they oppose," which she denies.

She compared Trump's tactics to those used by the online bullies that her organization teaches victims about.

"This is intended to intimidate us and silence us," Ballon said in an interview. "We are not silenced by the German far right, and we will not be by the U.S."

The State Department is preparing to release a report it says will expose how previous U.S. administrations worked with the tech industry and outside groups to stifle Americans' speech, officials have said. Multiple groups that track disinformation and have ties to Europe have been informed by the State Department that their private communications may be released publicly in this report, according to three of the people interviewed by The Post.

In the United States, the GOP has been for years fighting tech company policies that seek to limit the spread of hateful or false content. Social media firms ramped up their work in 2020 as they sought to limit the spread of what health authorities deemed to be misinformation about coronavirus vaccines and Trump's false claims that he was the winner of that year's presidential election. Republicans argued that such policies stifled conservative viewpoints online, while Democrats countered that right-wing publishers were among the highest-performing pages on social media.

An avalanche of lawsuits and congressional hearings has achieved some of the right's key goals, with tech CEOs revising their approaches to disinformation. Meta, which operates Facebook and Instagram, shut down its U.S. fact-checking program last year and lifted restrictions on content advocating against the rights of LGBTQ+ people. When Elon Musk took over Twitter and rebranded it X, he laid off content moderators in favor of a system of user-submitted notes. Outside the tech industry, funding for disinformation research has dried up, and some top researchers have left the field.

But officials in Europe, where many countries have speech laws more restrictive than those in the United States, have pressed ahead with regulating social media companies, passing the Digital Services Act in October 2022. Under the law, large tech companies are required to provide information to regulators and outside researchers about the underlying algorithms guiding their sites. The companies must also counter disinformation and take down content that is considered illegal in the country where it is viewed, which could include Holocaust denials in Germany or racial slurs in France. (Such posts tend not to be illegal in the United States, where the First Amendment protects many forms of hate speech and misinformation from government censorship.)

The Trump administration has set its sights on those regulations — and independent groups that champion similar ideas.

Clare Melford, a British activist who had her visa banned over Christmas, said the weight of the U.S. government is being brought to bear against her. Her organization, the Global Disinformation Index, is being investigated by the Federal Trade Commission over its work encouraging advertisers to not work with websites that promote divisive content.

"Some people regard it as you must be doing something right if you're annoying the U.S. administration, and others regard it as a risk factor," Melford said. "It has — absolutely — a chilling effect on the whole sector."

The State Department staffers tapped by Vance's office last year pursued their investigation by asking social media companies for examples of times they were ordered to take action against content or accounts because of the E.U. law, according to meeting notes reviewed by The Post. X officials hand-delivered a manila envelope marked confidential with a handful of examples that were mostly related to law enforcement requests, according to two people.

"We did not find anything," said one of the people. "It was not politically convenient that we could not find anything."

At the same time, high-ranking Trump officials were intensifying their public criticism of the law. Vance accused European governments of suppressing free expression at the Munich Security Conference in February 2025, likening the fight against misinformation to a Soviet-style push to squash disfavored ideas or political candidates.

Brendan Carr, the chair of the Federal Communications Commission, said in a speech in Barcelona last March that the DSA imposes "excessive" rules against tech companies and that "free speech" was "in retreat."

The administration considered ways it could use its own regulatory powers to limit the law's reach. That spring, it called a meeting that included officials from the Commerce, State, Defense and Treasury departments and the White House to discuss potential strategies to advance free expression, according to a copy of the meeting materials viewed by The Post.

The proposals included a system that would use export controls to offer tech companies more legal freedom to refuse requests from foreign governments to take down content, according to a copy of the proposal viewed by The Post. A licensing system run by the Commerce Department would have aimed to give American firms legal cover to object to requests to take down content deemed legitimate under a "speech standard" devised by the Trump administration.

The system has not been launched, but Rogers, the undersecretary, told a right-leaning podcaster in January that the State Department has other tools it could leverage, including imposing harsher sanctions, providing virtual networks to citizens in countries it considers to have a "censored internet" and raising the issue in upcoming trade negotiations.

"This is not just a cultural civilization issue — this free speech issue — it's a commercialization issue," she said.

Will Oremus and John Hudson contributed to this report.

CORRECTION

A previous version of this article incorrectly described the State Department's freedom.gov initiative. It will be a website and app allowing for people to access the open internet as Americans experience it, not a site hosting banned content.

What readers are saying

The comments express strong criticism of the Trump administration's stance on free speech, highlighting perceived hypocrisy in advocating for free speech abroad while allegedly suppressing it domestically. Many commenters accuse the administration of spreading misinformation and... Show more

This summary is AI-generated. AI can make mistakes and this summary is not a replacement for reading the comments.

Case No. 1:26-cv-815 (JEB)

EXHIBIT 9


Post
Secretary Marco Rubio
@SecRubio
For too long, Americans have been fined, harassed, and even charged by foreign authorities for exercising their free speech rights.
Today, I am announcing a new visa restriction policy that will apply to foreign officials and persons who are complicit in censoring Americans. Free speech is essential to the American way of life – a birthright over which foreign governments have no authority.
10:11 AM · May 28, 2025 · 13.2M Views
14K
32K
158K
4.4K
Read 14.4K replies

Case No. 1:26-cv-815 (JEB)

EXHIBIT 10

An official website of the United States Government Here's how you know

★ ★ ★

Announcement of Visa Restrictions on Brazilian Judicial Officials and their Immediate Family Members

PRESS STATEMENT

MARCO RUBIO, SECRETARY OF STATE

JULY 18, 2025

President Trump made clear that his administration will hold accountable foreign nationals who are responsible for censorship of protected expression in the United States. Brazilian Supreme Federal Court Justice Alexandre de Moraes's political witch hunt against Jair Bolsonaro created a persecution and censorship complex so sweeping that it not only violates basic rights of Brazilians, but also extends beyond Brazil's shores to target Americans. I have therefore ordered visa revocations for Moraes and his allies on the court, as well as

Case 1:26-cv-00815-JEB Document 11-19 Filed 03/26/26 Page 3 of 3

their immediate family members effective immediately.

This visa restriction policy is pursuant to Section 212(a)(3)(C) of the Immigration and Nationality Act, which authorizes the Secretary of State to render inadmissible any alien whose entry into the Unites States "would have potentially serious adverse foreign policy consequences for the United States." Certain family members may also be covered by these restrictions.

TAGS

Brazil | Bureau of Consular Affairs | Bureau of Western Hemisphere Affairs | Foreign Governments | Foreign Policy | Foreign Service | Immigration | Office of the Spokesperson | The Secretary of State | Section 212(a)(3)(c) Visa Restrictions | U.S. Visas and Green Cards

Case No. 1:26-cv-815 (JEB)

EXHIBIT 11



World

Judge suspends X platform in Brazil amid feud with Elon Musk

Updated on: August 30, 2024 / 4:59 PM EDT / AP

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A Brazilian Supreme Court justice on Friday ordered the suspension of Elon Musk's social media giant X in Brazil after the tech billionaire refused to name a legal representative in the country, according to a copy of the decision seen by The Associated Press

The move further escalates the monthslong feud between the two men over free speech, far-right accounts and misinformation.

Justice Alexandre de Moraes had warned Musk on Wednesday night that X, formerly known as Twitter, could be blocked in Brazil if he failed to comply with his order to name a representative, and established a 24-hour deadline. The company hasn't had a representative in the country since earlier this month.



Brazilian Supreme Court Chief Justice Alexandre de Moraes

Eraldo Peres / AP

In his decision, de Moraes gave internet service providers and app stores five days to block access to X, and said the platform will remain blocked until it complies with his orders. He also said people or companies who use virtual private networks, or VPNs, to access X will be subject to daily fines of 50,000 reais, or $8,900.

"Elon Musk showed his total disrespect for Brazilian sovereignty and, in particular, for the judiciary, setting himself up as a true supranational entity and immune to the laws of each country," de Moraes wrote.

Brazil is an important market for X, which has struggled with the loss of advertisers since Musk purchased it in 2022. Market research group Emarketer says some 40 million Brazilians, roughly one-fifth of the population, access X at least once per month.

X had posted on its official Global Government Affairs page late Thursday that it expected X to be shut down by de Moraes, "simply because we would not comply with

his illegal orders to censor his political opponents."

"When we attempted to defend ourselves in court, Judge de Moraes threatened our Brazilian legal representative with imprisonment. Even after she resigned, he froze all of her bank accounts," the company wrote. "Our challenges against his manifestly illegal actions were either dismissed or ignored. Judge de Moraes' colleagues on the Supreme Court are either unwilling or unable to stand up to him."

X has clashed with de Moraes over its reluctance to comply with orders to block users.

Accounts that the platform previously has shut down on Brazilian orders include lawmakers affiliated with former President Jair Bolsonaro's right-wing party and activists accused of undermining Brazilian democracy.

Musk, a self-proclaimed "free speech absolutist," has repeatedly claimed the justice's actions amount to censorship, and his argument has been echoed by Brazil's political right. He has often insulted de Moraes on his platform, characterizing him as a dictator and tyrant.

De Moraes' defenders have said his actions aimed at X have been lawful, supported by most of the court's full bench, and have served to protect democracy at a time in which it is imperiled. His order Friday is based on Brazilian law requiring foreign companies to have representation in the country so they can be notified when there are legal cases against them.

Given that operators are aware of the widely publicized standoff and their obligation to comply with an order from de Moraes, plus the fact doing so isn't complicated, X could be offline as early as 12 hours after receiving their instructions, said Luca Belli, coordinator of the Technology and Society Center at the Getulio Vargas Foundation, a university in Rio de Janeiro.

The shutdown is not unprecedented in Brazil.

Lone Brazilian judges shut down Meta's WhatsApp, the nation's most widely used messaging app, several times in 2015 and 2016 due to the company's refusal to comply with police requests for user data. In 2022, de Moraes threatened the messaging app Telegram with a nationwide shutdown, arguing it had repeatedly ignored Brazilian authorities' requests to block profiles and provide information. He

ordered Telegram to appoint a local representative; the company ultimately complied and stayed online.

X and its former incarnation, Twitter, have been banned in several countries — mostly authoritarian regimes such as Russia, China, Iran, Myanmar, North Korea, Venezuela and Turkmenistan. Other countries, such as Pakistan, Turkey and Egypt, have also temporarily suspended X before, usually to quell dissent and unrest. Twitter was banned in Egypt after the Arab Spring uprisings, which some dubbed the "Twitter revolution," but it has since been restored.

A search Friday on X showed hundreds of Brazilian users inquiring about VPNs that could potentially enable them to continue using the platform by making it appear they were logging on from outside the country. It was not immediately clear how Brazilian authorities would police this practice and impose fines cited by de Moraes.

Mariana de Souza Alves Lima, known by her handle MariMoon, showed her 1.4 million followers on X that she would go to rival social network BlueSky, posting a screenshot and saying: "That is where I'm going."

X said that it plans to publish what it has called de Moraes' "illegal demands" and related court filings "in the interest of transparency."

Also on Thursday evening, Starlink, Musk's satellite internet service provider, said on X that de Moraes this week froze its finances, preventing it from doing any transactions in the country where it has more than 250,000 customers.

"This order is based on an unfounded determination that Starlink should be responsible for the fines levied—unconstitutionally—against X. It was issued in secret and without affording Starlink any of the due process of law guaranteed by the Constitution of Brazil. We intend to address the matter legally," Starlink said in its statement.

Musk replied to people sharing the reports of the freeze, adding insults directed at de Moraes. "This guy @Alexandre is an outright criminal of the worst kind, masquerading as a judge," he wrote.

Musk later posted on X that SpaceX, which runs Starlink, will provide free internet service in Brazil "until the matter is resolved" since "we cannot receive payment, but

don't want to cut anyone off."

In his decision, de Moraes said he ordered the freezing of Starlink's assets, as X didn't have enough money in its accounts to cover mounting fines and reasoning that the two companies are part of the same economic group.

More from CBS News

MONEYWATCH
Here are Elon Musk's "most epic" goals for his vast Terafab chip plant



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In: **Brazil** **Elon Musk** **Twitter**

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EXHIBIT 12

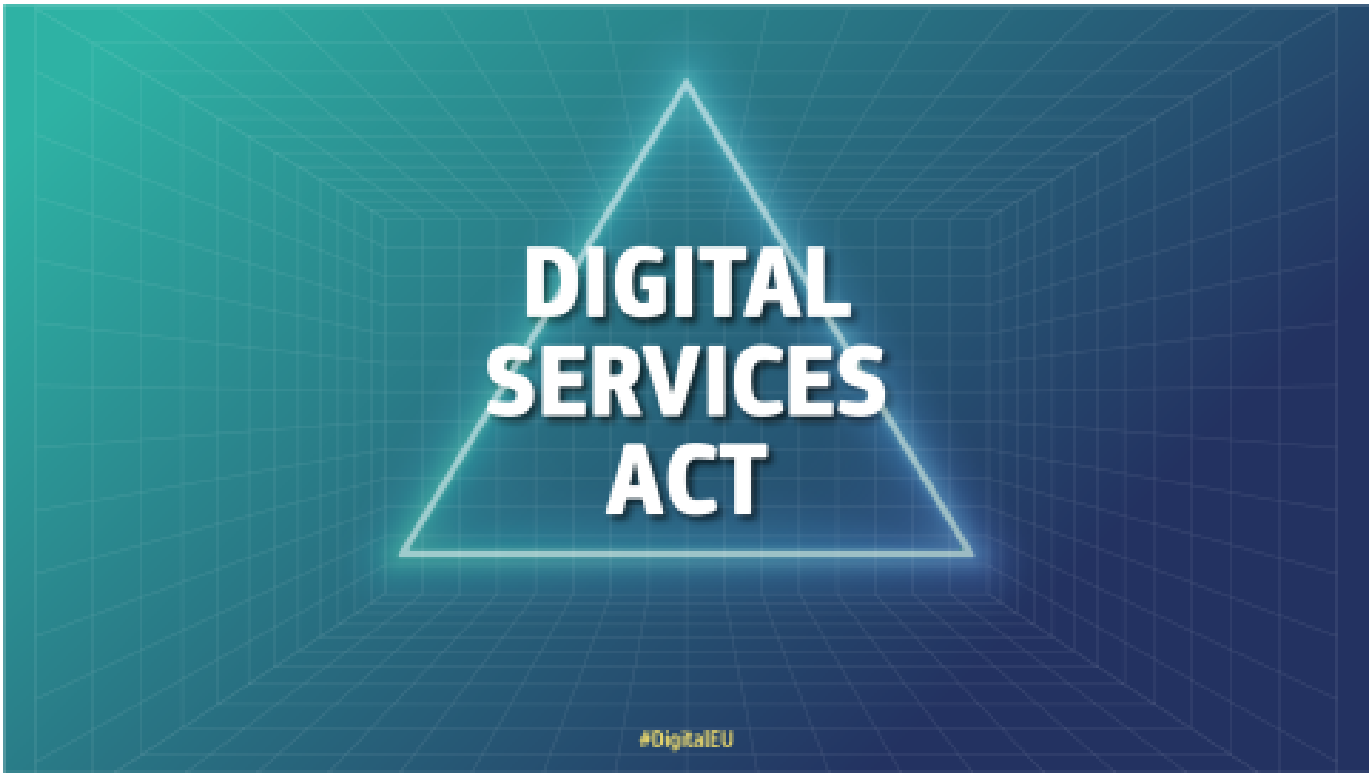
European Commission

Commission fines X €120 million under the Digital Services Act

PRESS RELEASE

Publication 05 December 2025

The Commission has issued a fine of €120 million to X for breaching its transparency obligations under the Digital Services Act (DSA).



The breaches include the deceptive design of its 'blue checkmark', the lack of

transparency of its advertising repository, and the failure to provide access to public data for researchers.

Deceptive design of X's ‘blue checkmark'

X's use of the ‘blue checkmark' for ‘verified accounts' deceives users. This violates the DSA obligation for online platforms to prohibit deceptive design practices on their services. On X, anyone can pay to obtain the ‘verified' status without the company meaningfully verifying who is behind the account, making it difficult for users to judge the authenticity of accounts and content they engage with. This deception exposes users to scams, including impersonation frauds, as well as other forms of manipulation by malicious actors. While the DSA does not mandate user verification, it clearly prohibits online platforms from falsely claiming that users have been verified, when no such verification took place.

Lack of transparency of X's ads repository

X's advertisement repository fails to meet the transparency and accessibility requirements of the DSA. Accessible and searchable ad repositories are critical for researchers and civil society to detect scams, hybrid threat campaigns, coordinated information operations and fake advertisements.

X incorporates design features and access barriers, such as excessive delays in processing, which undermine the purpose of ad repositories. X's ads repository also lacks critical information, such as the content and topic of the advertisement, as well as the legal entity paying for it. This hinders researchers and the public to independently scrutinise any potential risks in online advertising.

Failure to provide researchers access to public data

X fails to meet its DSA obligations to provide researchers with access to the platform's public data. For instance, X's terms of service prohibit eligible researchers from independently accessing its public data, including through scraping. Moreover, X's processes for researchers' access to public data impose unnecessary barriers,

effectively undermining research into several systemic risks in the European Union.

The fine issued today was calculated taking into account the nature of these infringements, their gravity in terms of affected EU users, and their duration.

This is the first non-compliance decision under the DSA.

Read the full press release.

Find out more about:

- Digital Services Act (DSA).
- Supervision under DSA

Related topics

Online platforms and e-commerce DSA - Digital Services Act

X Facebook LinkedIn E-mail More share options

Last update

16 January 2026

Print as PDF

Case No. 1:26-cv-815 (JEB)

EXHIBIT 13

Post



Secretary Marco Rubio
@SecRubio

The European Commission's $140 million fine isn't just an attack on @X, it's an attack on all American tech platforms and the American people by foreign governments.

The days of censoring Americans online are over.

11:06 AM · Dec 5, 2025 · **24.3M** Views

11K 22K 104K 2.4K

Read 11.3K replies

Case No. 1:26-cv-815 (JEB)

EXHIBIT 14

INDEX TO THE ADMINISTRATIVE RECORD DOCUMENTS PRODUCED ON FEBRUARY 6, 2026[1]

Ahmed v. Rubio, et al.
Case No. 25 Civ. 10705 (LAP)

Number	Document Title	Range
1	Approved Action Memo for the Secretary re Response Options to the European Commission's Fine of X Corp. Under the Digital Services Act (DSA)	DOS_001-004
2	Tab 2: INA Section 237(a)(4)(C) ("4C") and Subjects Recommended for Deportability Determinations	DOS_005-006
3	Tab 4: Memorandum for the Secretary of Homeland Security from Marco Rubio re Determination of Deportability under Section 237(a)(4)(C) of the INA	DOS_007-008
4	Tab 5: 8 U.S.C. § 1227 – Deportable Aliens	DOS_009-010

[1] This index has been prepared for the convenience of the Court and the parties. The index is not part of the administrative record.

REC1|Approve|12-19-2025|MR|MAR
REC2|Approve|12-19-2025|MR|MAR
REC3|Approve|12-19-2025|MR|MAR
REC4|Approve|12-19-2025|MR|MAR
REC5|Approve|12-19-2025|MR|MAR
REC6|Approve|12-19-2025|MR|MAR

2025011334

United States Department of State

Washington, DC 20520

SENSITIVE BUT UNCLASSIFIED December 16, 2025

Action Memo for the Secretary

FROM: Under Secretary Rogers (R)

SUBJECT: (SBU) Response Options to the European Commission's Fine of X Corp. Under the Digital Services Act (DSA)

(SBU) Unrelated to Challenged Determination

Decision: ☐ **Approve** ☐ **Disapprove** ☐ **Discuss**

(SBU) Recommendation 2: That you determine the presence and activities of Privacy Act Protected, a Privacy Act Protected national and U.S. LPR, in the United States would have potentially serious adverse foreign policy consequences for the United States, rendering him deportable under Section 237(a)(4)(C) ("4C") of the INA. (Approve/Disapprove by 12/19/25)

Decision: ☐ **Approve** ☐ **Disapprove** ☐ **Discuss**

(SBU) Recommendation 3: That you authorize notifying the Secretary of Homeland Security of the determination regarding Privacy Act Protected as a basis for the removal and authorize DHS and DOJ to use that notification in any immigration or legal proceedings, as necessary. (Approve/Disapprove by 12/19/25)

Decision: ☐ **Approve** ☐ **Disapprove** ☐ **Discuss**

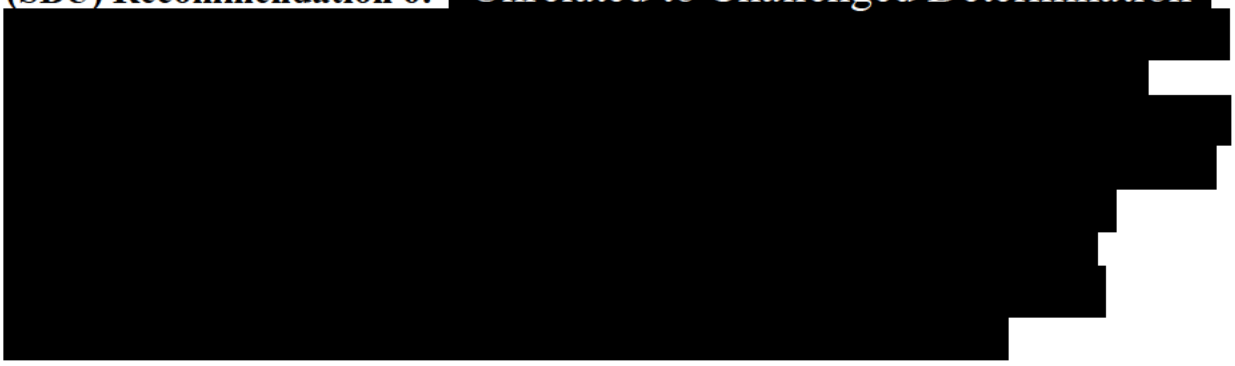
(SBU) Recommendation 4: That you determine the presence and activities of Imran Ahmen, a UK national and U.S. LPR, in the United States would have potentially serious adverse foreign policy consequences for the United States, rendering him deportable under 4C of the INA.
(Approve/Disapprove by 12/19/25)

Decision: ☐ **Approve** ☐ **Disapprove** ☐ **Discuss**

(SBU) Recommendation 5: That you authorize notifying the Secretary of Homeland Security of the determination as a basis for the removal and authorize DHS and DOJ to use that notification in any immigration or legal proceedings, as necessary. (Approve/Disapprove by 12/19/25)

Decision: ☐ **Approve** ☐ **Disapprove** ☐ **Discuss**

(SBU) Recommendation 6: Unrelated to Challenged Determination



Decision: ☐ **Approve** ☐ **Disapprove** ☐ **Discuss**

Background:
(SBU) On December 5, the Commission announced the first-ever enforcement fine under the DSA, penalizing X Corp. €120 million (approximately $140 million) for alleged violations related to paid verification practices, advertising transparency, and researcher data access. The decision is the culmination of a two-year investigation launched in December 2023 and preceded by July 2024 preliminary findings that X has rejected as unfounded.

(SBU) The EU adopted the DSA in October 2022 and entered it into force in February 2024. Its heaviest obligations apply to "Very Large Online Platforms" (VLOPs), defined as services with more than 45 million monthly active users in the EU. The act imposes strict content-moderation, risk-management, and transparency obligations. Of the 17 designated VLOPs, 13 are U.S.-based

(including X, Meta, Google, and Amazon), underscoring the law's impact on U.S. tech firms operating in Europe. Fines can reach up to 6 percent of a company's global annual revenue, potentially billions for X Corp. The company has 60–90 working days to comply and can appeal to the European Court of Justice.

(SBU) European officials framed the announcement as an assertion of "digital sovereignty." Commission VP Henna Virkkunen asserted, "This decision is about the transparency of X and has nothing to do with censorship." Anne Le Henanff, France's digital affairs minister, characterized the decision as historic, adding, "By sanctioning X, Europe shows it is capable of moving from words to action." Germany's Digital Minister Karsten Wildberger asserted, "The bloc's digital rules apply to everyone, no matter where they come from."

(SBU) The EU's action against X Corp. is more than a regulatory dispute; it reflects a broader political struggle over information control and the influence of U.S. technology platforms in Europe. X has surged to become the leading news app in every EU country, serving tens of millions of Europeans who use the platform daily to access uncensored information. This widespread use allows EU citizens to bypass official EU channels and state-influenced media, challenging the European Commission's ability to shape the public narrative.

Attachments

Tab 1 – [redacted: Unrelated to Challenged Determination]
Tab 2 – Recommended 4C Targets
Tab 3 – Memo for Secretary Noem – [redacted: Privacy Act Protected]
Tab 4 – Memo for Secretary Noem – Ahmed
Tab 5 – Legislation

Approved: R – Sarah Rogers, Under Secretary [SBR]

Drafted: R – Privacy Act Protected, ext. Privacy Act Protected and cell: Privacy Act Protected

Cleared:

Bureau	Name	Clearance Status
D:	Privacy Act Protected	ok
P:	Privacy Act Protected	ok
R:	Privacy Act Protected	ok
GPA	Privacy Act Protected	ok
C:	Privacy Act Protected	ok
L/FO:	Privacy Act Protected	ok
CA	Privacy Act Protected	ok
EUR/FO:	Privacy Act Protected	ok
DRL:	Privacy Act Protected	ok

SENSITIVE BUT UNCLASSIFIED

(SBU) INA Section 237(a)(4)(C) ("4C") and Subjects Recommended for Deportability Determinations

(SBU) Under Section 4C of the INA, an alien is deportable from the United States if the Secretary of State has reasonable grounds to believe the alien's presence or activities in the United States would have potentially serious adverse foreign policy consequences for the United States. R identified two U.S. LPRs: Privacy Act Protected and Imran Ahmed Privacy Act Protected. Ahmed, who leads an NGO involved in policing "disinformation," has advocated for foreign regulatory action that negatively impacts American companies and citizens, and has been involved in efforts to pressure U.S. companies to restrict speech of Americans and demonetize disfavored American media sources. Based on the activities of Privacy Act Protected and Ahmed, their presence in the United States has potentially serious adverse foreign policy consequences for the United States, as they undermine the foreign policy objective of the Administration to protect freedom of expression, and roll back domestic encroachments on speech. Consistent with those foreign policy objectives articulated in the May 2025 3C policy and E.O. 14150 "American First Policy Directive to the Secretary of State," the foreign policy of the United States protects "core American interests" and "American citizens." Protecting the freedom of expression of U.S. citizens is a core U.S. interest, as is defending U.S. sovereignty from foreign encroachment. Given the Administration's priority and success in rolling back domestic encroachments on free speech, it is especially critical as a foreign policy objective to ensure these gains are not undermined by foreign officials and individuals.

(SBU) Recommend subjects:

1. **(SBU)** Unrelated to Challenged Determination / Privacy Act Protected

Unrelated to Challenged Determination / Privacy Act Protected

2. **(SBU) Imran Ahmed, CEO of Center for Countering Digital Hate (CCDH), United Kingdom**: Ahmed was a key collaborator with the Biden administration on weaponizing the national security bureaucracy to censor U.S. citizens and pressure U.S. companies into censoring, and his group advocates for foreign regulatory action that extraterritorially impacts American citizens and companies. Ahmed is a UK national, and a U.S. LPR. Ahmed successfully led efforts to lobby Google to remove ads from the Federalist and ZeroHedge. He is most known for the infamous "Disinformation Dozen" report, in which CCDH called for platforms to remove the accounts of American "anti-vaxxers," including HHS Secretary Kennedy. Shortly thereafter, twelve Democrat attorneys general sent letters to X and Facebook citing the report. White House officials in the previous administration pressured platforms to take action against CCDH's "disinfo dozen." More recently, leaked documents from CCDH show the organization listed "kill Musk's Twitter" and "trigger EU and UK regulatory action" as priorities. CCDH advocates for both the UK Online Safety Act and EU Digital Services Act (DSA). Ahmed was listed as a signatory in HateAid's petition calling on the European Commission to take action to ensure access of platform data to researchers under the DSA.

(SBU) Ahmed is currently in the United States. If you determine they are deportable pursuant to your authority in INA 4C, the Executive Secretary will notify DHS of your determination, and DHS/ICE may elect to pursue removal proceedings, including possibly detaining Privacy Act Protected and Ahmed in the process.

(SBU) Attorney Work Product

THE SECRETARY OF STATE
WASHINGTON

December 19, 2025

SENSITIVE BUT UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

MEMORANDUM FOR THE SECRETARY OF HOMELAND SECURITY

FROM: Marco Rubio

SUBJECT: (SBU) Determination of Deportability under Section 237(a)(4)(C) of the INA

(SBU) I am writing to inform you I have determined that Imran Ahmed (DOB: [redacted] POB: UK), an alien in LPR status, is deportable under INA section 237(a)(4)(C) (8 U.S.C. 1227(a)(4)(C)). I understand DHS may now initiate removal charges against him.

(SBU) Under INA section 237(a)(4)(C)(i), an alien is deportable from the United States if the Secretary of State has reasonable ground to believe the alien's presence or activities in the United States would have potentially serious adverse foreign policy consequences for the United States. Under INA section 237(a)(4)(C)(ii), for cases in which the basis for this determination is the alien's past, current, or expected beliefs, statements, or associations that are otherwise lawful, the Secretary of State must personally determine that the alien's presence or activities would compromise a compelling U.S. foreign policy interest.

(SBU) Pursuant to these authorities, I have determined that Ahmed's activities and presence in the United States have potentially serious adverse foreign policy consequences and compromise a compelling U.S. foreign policy interest. Ahmed is the CEO of the Center for Countering Digital Hate (CCDH). Ahmed successfully led efforts to lobby Google to remove ads from the Federalist and ZeroHedge. CCDH's infamous "disinformation dozen" report specifically called for deplatforming Secretary Robert F. Kennedy and others. Leaked CCDH documents listed "kill Musk's Twitter" and "trigger EU and UK regulatory action" as priorities. CCDH advocates for both the UK Online Safety Act and EU Digital Services Act (DSA). Ahmed was listed as a signatory in HateAid's petition calling on the European Commission to take action to ensure access of platform data to researchers under the DSA. This determination is based on the same foreign policy objectives articulated in my May announcement of a policy to restrict visa issuance under INA section 212(a)(3)(C) (8 U.S.C. 1182(a)(3)(C)) for foreign

nationals who censor Americans. Consistent with E.O. 14150, American First Policy Directive to the Secretary of State, the foreign policy of the United States protects core American interests and U.S. citizens, and protecting the freedom of expression of Americans is a core American interest, as is defending American sovereignty from foreign encroachment. This determination reflects this Department's efforts to reject encroachments upon American sovereignty, especially when such encroachments undermine the exercise of our fundamental right to free speech.

(SBU) The Department of State also requests the opportunity to consult with DHS on any public statements regarding this determination.

(SBU) I hereby expressly authorize use of this notification by the Department of Homeland Security in immigration court, and the Department of Justice in any judicial proceedings, as needed.

8 USC 1227: Deportable aliens Text contains those laws in effect on March 6, 2025

From Title 8-ALIENS AND NATIONALITYCHAPTER 12-IMMIGRATION AND NATIONALITYSUBCHAPTER II-IMMIGRATIONPart IV-Inspection, Apprehension, Examination, Exclusion, and Removal

Jump To: Source CreditMiscellaneousReferences In TextPrior ProvisionsAmendmentsEffective DateSavings Provision

§1227. Deportable aliens

(a) Classes of deportable aliens

Any alien (including an alien crewman) in and admitted to the United States shall, upon the order of the Attorney General, be removed if the alien is within one or more of the following classes of deportable aliens:

(4) Security and related grounds

(A) In general

Any alien who has engaged, is engaged, or at any time after admission engages in-

(i) any activity to violate any law of the United States relating to espionage or sabotage or to violate or evade any law prohibiting the export from the United States of goods, technology, or sensitive information,

(ii) any other criminal activity which endangers public safety or national security, or

(iii) any activity a purpose of which is the opposition to, or the control or overthrow of, the Government of the United States by force, violence, or other unlawful means,

is deportable.

(C) Foreign policy

(i) In general

An alien whose presence or activities in the United States the Secretary of State has reasonable ground to believe would have potentially serious adverse foreign policy consequences for the United States is deportable.

(ii) Exceptions

The exceptions described in clauses (ii) and (iii) of section 1182(a)(3)(C) of this title shall apply to deportability under clause (i) in the same manner as they apply to inadmissibility under section 1182(a)(3)(C)(i) of this title.

int] [Print selection]

[OLRC Home]Help

8 USC 1182: Excludable aliens Text contains those laws in effect on January 4, 1995

From Title 8-ALIENS AND NATIONALITYCHAPTER 11-NATIONALITYSUBCHAPTER II-IMMIGRATIONPart II-Admission Qualifications for Aliens; Travel Control of Citizens and Aliens

Jump To: Source CreditFuture AmendmentsReferences In TextAmendmentsChange of NameEffective DateMiscellaneousRegulationsTermination DateExecutive DocumentsCross Reference

§1182. Excludable aliens

(a) Classes of excludable aliens

Except as otherwise provided in this chapter, the following describes classes of excludable aliens who are ineligible to receive visas and who shall be excluded from admission into the United States:

(3) Security and related grounds

(C) Foreign policy

(i) In general

An alien whose entry or proposed activities in the United States the Secretary of State has reasonable ground to believe would have potentially serious adverse foreign policy consequences for the United States is excludable.

(ii) Exception for officials

An alien who is an official of a foreign government or a purported government, or who is a candidate for election to a foreign government office during the period immediately preceding the election for that office, shall not be excludable or subject to restrictions or conditions on entry into the United States under clause (i) solely because of the alien's past, current, or expected beliefs, statements, or associations, if such beliefs, statements, or associations would be lawful within the United States.

(iii) Exception for other aliens

An alien, not described in clause (ii), shall not be excludable or subject to restrictions or conditions on entry into the United States under clause (i) because of the alien's past, current, or expected beliefs, statements, or associations, if such beliefs, statements, or associations would be lawful within the United States, unless the Secretary of State personally determines that the alien's admission would compromise a compelling United States foreign policy interest.

(iv) Notification of determinations

If a determination is made under clause (iii) with respect to an alien, the Secretary of State must notify on a timely basis the chairmen of the Committees on the Judiciary and Foreign Affairs of the House of Representatives and of the Committees on the Judiciary and Foreign Relations of the Senate of the identity of the alien and the reasons for the determination.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IMRAN AHMED Plaintiff, v. MARCO RUBIO, in his official capacity as Secretary of State; SARAH B. ROGERS, in her official capacity as Under Secretary of State for Public Diplomacy; PAMELA BONDI, in her official capacity as Secretary of Homeland Secretary; TODD M. LYONS, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement; JUDITH ALMODOVAR, in her official capacity as Acting Field Office Director of the New York Immigration and Customs Enforcement Office, Defendants.	Case no. 1:25-cv-10705

CERTIFICATION OF
ADMINISTRATIVE RECORD

I, Ryan O'Donnell, hereby declare under penalty of perjury:

1. I am employed by the United States Department of State, Office of the Under Secretary of State for Public Diplomacy. The facts attested to herein are based upon my personal knowledge and upon information provided to me in my official capacity.
2. I certify, based upon my personal knowledge and upon information provided to me in my official capacity, that the following documents annexed hereto constitute the Department of State's Administrative Record in this matter.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1476, that the foregoing is true and correct to the best of my knowledge.

Executed on February 6, 2026

Ryan P. O'Donnell

_____

SBU - LEGAL

Case No. 1:26-cv-815 (JEB)

EXHIBIT 15

An official website of the United States Government Here's how you know

Announcement of Actions to Combat the Global Censorship-Industrial Complex

PRESS STATEMENT

MARCO RUBIO, SECRETARY OF STATE

DECEMBER 23, 2025

The State Department is taking decisive action against five individuals who have led organized efforts to coerce American platforms to censor, demonetize, and suppress American viewpoints they oppose. These radical activists and weaponized NGOs have advanced censorship crackdowns by foreign states—in each case targeting American speakers and American companies. As such, I have determined that their entry, presence, or activities in the United States have potentially serious adverse foreign policy consequences for the United States.

Based on these determinations, the Department has taken steps to impose visa restrictions on agents of the global censorship-industrial complex who, as a result, will be generally barred from entering the United States. Further, based on the foreign policy determination, the Department of Homeland Security can initiate removal proceedings against certain individuals pursuant to INA section 237(a)(4)(C), which renders such individuals deportable.

President Trump has been clear that his America First foreign policy rejects violations of American sovereignty. Extraterritorial overreach by foreign censors targeting American speech is no exception. The State Department stands ready and willing to expand today's list if other foreign actors do not reverse course.

These actions are pursuant to Section 212(a)(3)(C) of the Immigration and Nationality Act, which renders inadmissible any alien whose entry into the Unites States the Secretary of State determines "would have potentially serious adverse foreign policy consequences for the United States." Certain family members may also be covered by these restrictions. In addition, Section 237(a)(4)(C) of the Immigration and Nationality Act renders an alien deportable from the United States if the Secretary of State has reasonable grounds to believe the alien's presence or activities in the United States would have potentially serious adverse foreign policy consequences.

Cookie Settings

TAGS

Censorship | Freedom of Speech and Expression | Office of the Spokesperson | The Secretary of State

Case No. 1:26-cv-815 (JEB)

EXHIBIT 16

← **Post**



Secretary Marco Rubio
@SecRubio

For far too long, ideologues in Europe have led organized efforts to coerce American platforms to punish American viewpoints they oppose. The Trump Administration will no longer tolerate these egregious acts of extraterritorial censorship.

Today, @StateDept will take steps to bar leading figures of the global censorship-industrial complex from entering the United States. We stand ready and willing to expand this list if others do not reverse course.

2:25 PM · Dec 23, 2025 · **7.9M** Views

Case No. 1:26-cv-815 (JEB)

EXHIBIT 17

← **Post**



Under Secretary of State Sarah B. Rogers
@UnderSecPD

WE'VE SANCTIONED: Thierry Breton, a mastermind of the Digital Services Act. In August 2024, while serving as European Commissioner for Internal Markets and Digital Services, he published a letter using the DSA to threaten @elonmusk ahead of his livestream interview with President Trump. Before the interview, Breton ominously reminded Musk of @X's legal obligations and ongoing "formal proceedings" for alleged noncompliance with "illegal content" and "disinformation" requirements under the DSA.

3:46 PM · Dec 23, 2025 · **5.4M** Views

1.4K 5.1K 28K 1.6K

Case No. 1:26-cv-815 (JEB)

EXHIBIT 18

← **Post**



Under Secretary of State Sarah B. Rogers
@UnderSecPD

WE'VE SANCTIONED: Imran Ahmed, key collaborator with the Biden Administration's effort to weaponize the government against U.S. citizens. Ahmed's group, Center for Countering Digital Hate (CCDH), created the infamous "disinformation dozen" report, which called for platforms to deplatform twelve American "anti-vaxxers", including now-HHS Secretary @SecKennedy. Leaked documents from CCDH show the organization listed "kill Musk's Twitter" and "trigger EU and UK regulatory action" as priorities. The organization supports the UK's Online Safety Act and EU's Digital Services Act to expand censorship in Europe and around the world.

3:46 PM · Dec 23, 2025 · **2M** Views

353 2.5K 16K 695

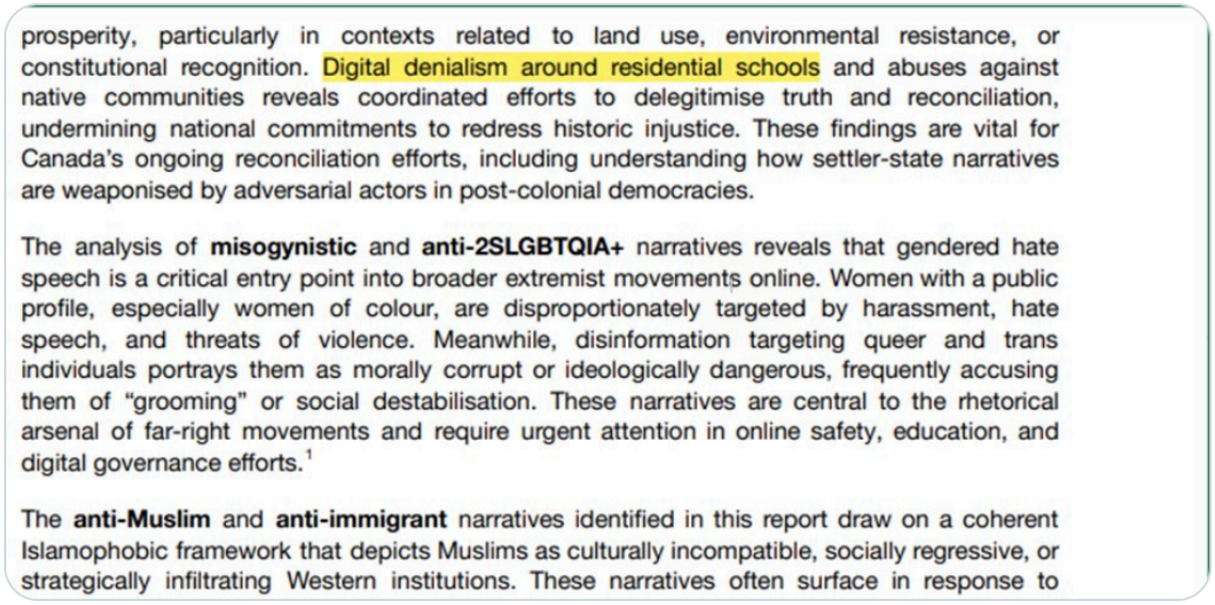
Case No. 1:26-cv-815 (JEB)

EXHIBIT 19

← **Post**

Under Secretary of State Sarah B. Rogers
@UnderSecPD

WE'VE SANCTIONED: Clare Melford. She leads Global Disinformation Index (GDI), a UK-based organization that monitors websites for “hate speech” and “disinformation”. If you question Canadian blood libels about residential schools, you're engaging in “hate speech” according to Melford and GDI. This NGO used @StateDept taxpayer money to exhort censorship and blacklisting of American speech and press. They also joined the deleterious EU Code of Practice on Disinformation.



prosperity, particularly in contexts related to land use, environmental resistance, or constitutional recognition. Digital denialism around residential schools and abuses against native communities reveals coordinated efforts to delegitimise truth and reconciliation, undermining national commitments to redress historic injustice. These findings are vital for Canada's ongoing reconciliation efforts, including understanding how settler-state narratives are weaponised by adversarial actors in post-colonial democracies.

The analysis of **misogynistic** and **anti-2SLGBTQIA+** narratives reveals that gendered hate speech is a critical entry point into broader extremist movements online. Women with a public profile, especially women of colour, are disproportionately targeted by harassment, hate speech, and threats of violence. Meanwhile, disinformation targeting queer and trans individuals portrays them as morally corrupt or ideologically dangerous, frequently accusing them of “grooming” or social destabilisation. These narratives are central to the rhetorical arsenal of far-right movements and require urgent attention in online safety, education, and digital governance efforts.[1]

The **anti-Muslim** and **anti-immigrant** narratives identified in this report draw on a coherent Islamophobic framework that depicts Muslims as culturally incompatible, socially regressive, or strategically infiltrating Western institutions. These narratives often surface in response to

3:47 PM · Dec 23, 2025 · **845.5K** Views

219 2.1K 15K 455

Read 219 replies

Case No. 1:26-cv-815 (JEB)

EXHIBIT 20

← **Post**



Under Secretary of State Sarah B. Rogers
@UnderSecPD

WE'VE SANCTIONED: Josephine Ballon, co-leader of HateAid, who flags disfavored speech throughout Europe under the Digital Services Act. In addition to her running an official "trusted flagger" body under the DSA, she serves on Germany's Advisory Council of the Digital Services Coordinator (DSC), which directly advises Germany's DSC on the application and enforcement of the DSA. In February 2025, Ballon spoke before an American audience in a notable 60 Minutes interview, outlining her position on censorship succinctly: "Free speech needs boundaries." In October 2024, she vowed to stop the "emotionalization of debates" by "regulating platforms".

3:48 PM · Dec 23, 2025 · **421.9K** Views

191 1.2K 10K 251

Case No. 1:26-cv-815 (JEB)

EXHIBIT 21

← **Post**



Under Secretary of State Sarah B. Rogers
@UnderSecPD

WE'VE SANCTIONED: Anna-Lena von Hodenberg, the leader and founder of HateAid, a German organization founded after the 2017 German federal elections to counter conservative groups. HateAid is an official “trusted flagger” (a censor) under the EU’s anti-speech Digital Services Act (DSA) and routinely demands access to propriety social media platform data to help it censor more. Hodenberg cited threat of “disinformation” from “right-wing extremists” online in upcoming U.S. and EU elections when circulating a petition for the DSA to become more strongly enforced to allow data access for “researchers".

3:48 PM · Dec 23, 2025 · **1.2M** Views

883 2.7K 17K 852

Case No. 1:26-cv-815 (JEB)

EXHIBIT 22

AGENCY STRATEGIC PLAN
FISCAL YEARS 2026-2030
U.S. DEPARTMENT *of* STATE

Strategic Goal Framework

Goal 1: U.S. National Sovereignty

Objective 1.1: Secure America's borders and the American people's right to decide who to admit and on what terms.

Objective 1.2: Ensure all Americans can exercise their rights free from foreign interference.

Objective 1.3: Engage in international organizations only when it advances America's national interests.

Goal 2: The Western Hemisphere and Establishment of the Donroe Doctrine

Objective 2.1: Counter and reverse our competitors' influence in the Western Hemisphere.

Objective 2.2: Strengthen strategic partnerships in the Western Hemisphere.

Objective 2.3: Suppress narco-terrorist gangs and cartels.

Goal 3: Peace and Stability in the Indo-Pacific Region

Objective 3.1: Strengthen the Indo-Pacific economic system to support U.S. reindustrialization and reinforce ties with allies.

Objective 3.2: Deter aggression and establish favorable military balance across the region.

Goal 4: Rebuild the Civilizational Alliance with European States

Objective 4.1: Transfer primary responsibility for conventional European defense to allies and expand our joint defense industrial base

Objective 4.2: Rebalance U.S. trade with European allies and decrease their economic dependencies on adversarial powers.

Objective 4.3: Defend civilizational values and reassert national sovereignty.

Goal 5: U.S. Economic and Technological Dominance

Objective 5.1: Reindustrialize the United States.

Objective 5.2: Stop foreign actors' abuse of the global trading system.

Objective 5.3: Drive the United States's strategic leverage by increasing U.S. exports and investment.

Objective 5.4: Strengthen U.S. technological edge and industry dominance.

Goal 6: Targeted Foreign Assistance that Puts American Interests First

Objective 6.1: Leverage assistance as a tool of statecraft.

Objective 6.2: Promote and provide trade, not aid.

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Objective 1.1: Secure America's borders and the American people's right to decide who to admit and on what terms. 4

Objective 1.2: Ensure all Americans can exercise their rights free from foreign interference. 5

Objective 1.3: Engage in international organizations only when it advances America's national interests. 5

Goal 2: The Western Hemisphere and Establishment of the Donroe Doctrine 7

Objective 2.1: Counter and reverse our competitors' influence in the Western Hemisphere. 7

Objective 2.2: Strengthen strategic partnerships in the Western Hemisphere. 8

Objective 2.3: Suppress narco-terrorist gangs and cartels. 8

Goal 3: Peace and Stability in the Indo-Pacific Region 9

Objective 3.1: Strengthen the Indo-Pacific economic system to support U.S. reindustrialization and reinforce ties with allies. 9

Objective 3.2: Deter aggression and establish favorable military balance across the region. 10

Goal 4: Rebuild the Civilizational Alliance with European States 11

Objective 4.1: Transfer primary responsibility for conventional European defense to allies and expand our joint Defense Industrial Base. 12

Objective 4.2: Rebalance U.S. trade with European allies and decrease their economic dependencies on adversarial powers. 12

Objective 4.3: Defend civilizational values and reassert national sovereignty. 13

Goal 5: U.S. Economic and Technological Dominance 14

Objective 5.1: Reindustrialize the United States. 14

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Objective 5.3: Drive the United States's strategic leverage by increasing U.S. exports and investment. 15

Objective 5.4: Strengthen U.S. technological edge and industry dominance. 16

Goal 6: Targeted Foreign Assistance that Puts American Interests First 18

Objective 6.1: Leverage assistance as a tool of statecraft. 18

Objective 6.2: Promote and provide trade, not aid. 19

Foreword by Secretary Rubio

I am pleased to submit the Department of State's Agency Strategic Plan (ASP) for Fiscal Years 2026-2030. These four years come at a defining period for the United States and our place in the world. With President Trump's agenda of domestic renewal and peace through strength, we will usher in a new era of American greatness.

President Trump inherited from his predecessor a dangerous world full of unprecedented challenges facing this nation: systematic infringements on our sovereignty; the return of multi-faceted great power competition unlike any we have seen since the end of the Cold War; rampant abuse and exploitation in the global trading system; a post-war global order increasingly plagued with anti-Western ideology and weaponized against us; the erosion of our borders and an epidemic of unchecked global mass migration; and global chaos, instability, and armed conflict of a scale not seen in decades.

Tackling these problems requires a dynamic and vigorous America. Yet, after years of weak leadership, we are beset by social division. We have been suffering from a declining manufacturing and industrial base. We have been growing increasingly dependent on foreign supply chains. We have become increasingly ashamed of our own culture, identity, and values. And, in many quarters, there is a creeping fatalism about the future of American power and prosperity. Moreover, we call upon a set of core allies with the same ailments, and which have grown increasingly weak and incapable of protecting themselves—much less willing to shoulder their fair share of responding to collective challenges.

For too long, these issues have festered due to a misguided U.S. foreign policy that never re-calibrated from the fleeting triumphalism of the fall of the Iron Curtain. For some thirty-five years, the bipartisan consensus of that moment has guided a diplomatic agenda committed to multilateralism, globalization, and to remaking—often by force—disparate parts of the world in the image of Western democracies. That foreign policy consistently elevated the interests of the "global community" and the "rules-based order" above the national interests of the United States and our people. In an earlier era, such an approach may have merely been self-defeating; facing today's challenges, it risks putting America on a path towards civilizational and geopolitical suicide.

Correcting course demands a rapid return to a pragmatic diplomacy committed to advancing the national interests of the United States and our people. In other words, it requires a foreign policy that puts America First.

How do we practice America First foreign policy? To start, we must be clear, concrete, and limited in the delineation of our core national interests. The United States is blessed with tremendous assets—physical, financial, military, geographical, and otherwise—but our resources are hardly infinite and the problems we face are many. We cannot hope to solve every issue, or to prevent every global tragedy. Success requires clear-eyed prioritization of the key interests in our diplomatic agenda.

President Trump has been clear that America's national interests start at home and that our government's first duty is to protect America and Americans. Moreover, no significant structure can stand without a robust foundation; a safe, secure, and prosperous United States is a prerequisite for a powerful global presence.

Domestic renewal begins by reasserting American sovereignty—over our territory, our people and commercial enterprises, and our state. Under

President Trump, illegal border crossings have reached historic lows. We will continue to control our borders, ensuring that only lawful and vetted people reach our shores, and expeditiously remigrate all those who do not belong. Just as importantly, the United States must reclaim our economic independence: rebuilding our industrial and manufacturing capacities, building durable supply chains, reestablishing American energy dominance, championing our businesses, and investing in homegrown innovation to ensure U.S. leadership in the technologies of tomorrow.

A robust foundation depends also upon a strong, safe and market-oriented Western Hemisphere. A focus on peace and security in our hemisphere ought not be confused with isolationism or a withdrawal from the rest of the world. Rather, it reflects the common-sense recognition that America cannot effectively project power around the world if it is not prosperous and safe at home.

After decades of failed U.S. policymakers prioritizing faraway conflicts, our region has become marred by a handful of weak states overtaken by narco-terrorist criminal organizations, disorder, and the malign influence of geopolitical adversaries. Cartels exploit these failed states to ship poison across our borders, while foreign powers leverage them to project military might mere miles from our shores.

No longer. Under President Trump, the United States will reassert control of our hemisphere, stamping out foreign military power, organized crime, and terrorists. The projection of foreign power in the Western Hemisphere will once again be treated as a hostile act towards the United States. In its place, we will cultivate a network of strong, stable, and growth-oriented allies. Together, we will eradicate disorder, drug trafficking, and mass migration in our hemisphere. We will also promote shared prosperity with these friendly states—expanding fair trade, private sector investment, and targeted foreign assistance, and near-shoring key supply chains.

Similar principles will guide American global engagement farther from our shores. Above all, the United States will pursue a posture of peace through strength—maintaining both the might to beat back any adversary, but also the restraint to only use force when necessary. Under President Trump, the United States has already used our strength to become the preeminent facilitator of global peace in the most intractable global conflicts, from Israel and Gaza to Armenia to Cambodia. Our peace and strength are self-reinforcing in a virtuous cycle: a peaceful world is one in which America can be strong and prosperous, while a strong and prosperous America will, in turn, promote more peace and global prosperity.

Nor will the United States shy away from competition with China or other geopolitical adversaries. While we do not seek unnecessary conflict, we will zealously guard our interests—political, security, economic, and otherwise—against encroachment by China, Russia, Iran and other geopolitical rivals. Doing this will require that we shrewdly allocate resources to the most pressing challenges. We ought not forget the damage and distraction done by allowing the United States to become mired in never-ending conflicts far from our borders and detached from our core interests. Prudence and prioritization are essential to ensuring a quiet resolve that deters, rather than invites, foreign aggression.

To this end, we will also empower strong and self-sufficient allies, ensuring that our friends are able to contribute their fair share towards collective security and welfare. As the President's Abraham Accords in the Near East have demonstrated, self-sufficient allies, united with and led by America through economic and technological partnerships, will be capable of more independently addressing regional challenges, allowing the United States to prioritize strategic imperatives. Our allies will also play key roles helping us push back against anti-

Americanism in international organizations, protect free and open sea lanes and commercial corridors, and prevent foreign powers from dominating key regional resources and domains.

Once more, commerce will play a critical role in forging alliances and partnerships. American enterprise is the root of our global power and our domestic prosperity. President Trump has made clear that the United States will no longer tolerate being fleeced in the global trading system, the pilfering of our intellectual property, nor exploitation of our workers. Instead, we will embrace the President's dealmaking ethos and forge new ventures, compacts, and trade agreements that will bring about fair and mutually beneficial trade and economic partnerships with our friends and allies. Through a reinvigorated focus on commercial diplomacy, we will protect American businesses, workers, and economic interests across the world.

This is an ambitious mandate. To seize it, we must above all reclaim American pride. As President Trump has said, for all the challenges we face, the United States is still the indispensable nation. The United States has led nearly every economic, social, technological, and political evolution of the last century and we must never forget it. The original sin of globalism is that it denied American exceptionalism and deluded us into becoming ashamed of our history, strength, and prosperity. The United States must never be made to apologize for our power, our wealth, our victories, or our Western values. At our core, we are a proud people—proud of our country, our might, and our culture. A truly American foreign policy ought to reflect this indominable spirit.



Our confidence, however, must remain tempered by pragmatism. At his core, President Trump is a deal-maker and, like any great deal-maker, his agenda is defined by realism. Success in diplomacy means meeting countries on their own terms, and respecting differences in culture, history, and governance. It means rejecting the arrogant paternalism of thinking we can or should change the customs or politics of foreign nations where there is not a direct benefit to doing so. It means dealing in the art of the possible and not wishing away constraints—whether they be natural, geographical, geopolitical, economic, or social.

The Department of State's diplomatic engagement is at the center of this vision. America First is not a retreat from diplomacy—but rather a recommitment to its truest form. For centuries, diplomacy has been defined by sober, pragmatic dialogue and guided by the axiom that rational global actors will act for the benefit of their people and their states. Although forgotten for too long, the art and prudence of traditional interests-oriented diplomacy has been in the bones of the Department of State since 1789. By reclaiming its promise, together we can put America First and usher in the next era of American peace and prosperity.

Marco Rubio
United States Secretary of State

Goal 1: U.S. National Sovereignty

The first job of the U.S. government, including the Department of State, is to ensure the continued survival of our nation as a self-governing republic that defends the safety and interests of Americans. For too long, U.S. policymakers assumed that open borders, global integration, and deference to multilateral institutions and agreements would produce outcomes that would be good for the globe and, therefore, good for America. This experiment failed. Re-prioritizing our national sovereignty and national interest means reevaluating our assumptions towards migration, global engagement, and multilateralism.

The Department will advance the sovereignty of our nation, at the core of which is control of our borders. Without this, there is no recognizable nation on whose behalf the U.S. government can act. We will advocate for the sovereignty of our citizens—their safety at home and abroad, and their freedom from foreign efforts to curb their rights—and of our businesses, which are regularly subject to unfair practices around the world. As the Department restores the sovereignty of the United States, it will reduce deference to multilateralism and global bureaucratic consensus, which too often reflect destructive ideologies and strategic misalignment with U.S. interests.

Objective 1.1: Secure America's borders and the American people's right to decide who to admit and on what terms.

For decades, the United States allowed tens of millions of migrants—legal and illegal—to enter the country. We were told unfettered mass migration was a fact of nature and a positive good. The more Americans objected, the more migration increased. This was a damaging mistake and an affront to the people that the U.S. government serves.

As Secretary Rubio has stated repeatedly, the era of mass migration is over. Previous administrations used the Department's powers—including visa issuance, refugee admission, and billions in humanitarian assistance—to facilitate this crisis. The Department will no longer be complicit in these abuses. Instead, we will protect our borders and defend the value of American citizenship. Ending the crisis brought on by open borders and reversing the damage it has done to the United States is one of the Department's essential tasks.

A visa is a privilege, not a right, and recipients are guests in our country. Every decision on foreign admissions is a national security decision, and Department personnel will prioritize the safety and well-being of Americans appropriately.

In collaboration with the Department of Homeland Security and other relevant U.S. government agencies, the Department will continually improve our screening and vetting policies and procedures for those who seek immigration benefits. This includes ensuring that applicants do not pose any risks to public safety or national security, do not bear hostile attitudes toward our citizens, culture, government, institutions, or founding principles, or show other signs of anti-Americanism. In addition, we will reinvigorate and expand the application of the "public charge" ineligibility to ensure visa holders do not become burdens to American society.

Remigration and border security are central to our diplomatic engagements, especially to those in our hemisphere. That includes ensuring foreign countries facilitate the repatriation of their nationals who have no right to remain in the United States; negotiating arrangements with other countries to accept the transfer of asylum claimants and illegal aliens removed from American communities; and working with DHS to support voluntary remigration. We also will use foreign assistance to support countries that help us achieve our immigration priorities. Mass migration and weak borders are not inevitabilities to manage, but problems that the Department's resources and U.S. bilateral relationships must help to solve.

Objective 1.2: Ensure all Americans can exercise their rights free from foreign interference.

The U.S. government exists to protect the God-given natural rights of Americans, including the rights of free speech, of religion and of conscience, and the right to choose and influence our common government. Nevertheless, foreign governments and international organizations are creating laws and regulations that impose restrictions on these rights. These laws enacted across the globe affect American companies, but also can target Americans abroad and at home.

For their own domestic political purposes, foreign governments have imposed restrictions on speech that would be unacceptable in the United States, including by enforcing conditions to operate or levying fines on technology and media companies that operate in those countries. Meanwhile, globalist bureaucrats and activists direct campaigns in multilateral bodies and through NGOs which seek to restrict the right of free speech in the name of combatting "hate speech," promoting "trust and safety," or countering "disinformation."

The Department will oppose efforts by foreign countries, international organizations and NGOs, and activist groups that seek to censor Americans in their own country. We will counter these efforts through all appropriate means including visa and financial sanctions.

At the same time, the Department will scrutinize attempts by foreign powers to exercise influence within the United States. These efforts are not new, but now seek to manipulate American public life through a widening spectrum of influence operations. This includes lobbying and lawfare; NGO activities, including through think-tanks, cultural centers, and educational institutions; and media manipulation, including paid media and social media campaigns. In some cases, these activities have fomented or contributed to civil unrest in U.S. cities. Moreover, foreign powers seek to acquire or control assets important to our national security and public safety, including real estate and infrastructure.

Such activities threaten our sovereignty and limit Americans' exercise of their rights by displacing their legitimate participation in the public life of their own country. In cooperation with other U.S. government agencies, the Department will uncover and investigate such activities and counter them by all available means.

Objective 1.3: Engage in international organizations only when it advances America's national interests.

International organizations exist to advance the interests of sovereign nations. They are not global legislatures or independent sources of moral, political, or legal authority. They stray from their proper purpose when they develop their own constituencies and seek to advance agendas that no citizen can approve or reject.

Generations of American leadership were convinced that global engagement was a good in itself, and that connectivity therein would bring about global peace and make great power rivalry obsolete. This dream has not and will not come to pass. While the United States was squandering our influence advancing these flawed ideas, we were being outplayed in the real competition among great powers.

The Department will no longer fund or support international organizations or conventions that act contrary to America's interests or that erode our sovereignty. We will no longer defer to unelected international bureaucrats who run them. We will not permit international organizations to become weapons in the hands of our adversaries, deployed to target Americans and citizens of partner nations such as Israel. Instead, we will focus on increasing American influence and driving reform in organizations whose work affects our concrete national interests, particularly the standard-setting bodies, while imposing real accountability on those who threaten Americans, our national interests, or those of our allies. America's adversaries use international organizations to undermine and reshape the global order or to extract funding that is used against our interests. We, in turn, will use American leadership to return useful bodies to their original purposes, i.e., to build coalitions which clearly and concretely serve to advance our national interests.

Specifically, there is need for renewed focus at the United Nations, which has strayed far from its purpose of solving international disputes peacefully. We will push back on the UN's 2030 Agenda and Sustainable Development Goals (SDGs), which advance a program of soft global governance inconsistent with U.S. sovereignty and adverse to the rights and interests of Americans. We will seek to block resolutions that undermine U.S. interests or those of our allies, withhold or condition funding to promote reforms, and promote U.S.-led peace processes. Additionally, the Department will lead efforts to wind down costly and ineffective peacekeeping and special political missions around the world.

Declarations of international bodies inconsistent with U.S. sovereign law cannot and will not constrain our decision making. We will respond sternly, using the full array of diplomatic and economic tools at our disposal, to such attempts to limit us.

Goal 2:
The Western Hemisphere and Establishment of the Donroe Doctrine

Geography has long blessed the United States with distance from other great powers as well as a prosperous and resource-rich hemisphere relatively free of strife and instability. Our status as a global superpower was built on this foundation: without serious enemies or conflicts at our borders, we have been able to project power abroad unhindered.

Over recent decades, however, we have let these pillars of our strength erode: geopolitical adversaries and transnational criminal groups have made major inroads into the region; our local allies have been forgotten in our rush to remake far-distant foreign nations; and our neighborhood has been swamped by unchecked migration, illegal drugs, and the terrorist gangs and cartels that push them.

Not any longer. President Trump has already demonstrated through bold action that "American dominance in the Western Hemisphere will never be questioned again" Under the new "Donroe Doctrine," the United States has re-established absolute primacy in our hemisphere—both by bringing anti-American and rogue states to heel, and by forging powerful new security and economic partnerships with likeminded states.

Objective 2.1: Counter and reverse our competitors' influence in the Western Hemisphere.

Originally declared in 1823, the Monroe Doctrine was the north star of American foreign policy during the U.S.' long rise to superpower status. Decade after decade, the Doctrine evolved in tandem with the threats of the moment, but at its heart, it always reflected the same core truth: that the United States is safest, strongest, and most prosperous when outside adversaries cannot establish themselves in the Western Hemisphere.

Over the last few decades, our country has lost sight of that truth. No longer. The United States will work to ensure our neighbors never feel that they owe political fealty to any extra-hemispheric power, or that any extra-hemispheric power controls the fates and destinies of their people. Furthermore, we will not allow any foreign adversary to use force or establish a military base anywhere in the region, and will seek to reverse the expansion of all other forms of foreign military influence, including the spread of foreign security assistance, intelligence facilities, and facilities with dual-use possibilities.

Historically, the Monroe Doctrine focused primarily on the expulsion of extra-hemispheric military and political influence. The Donroe Doctrine expands this principle to purge unchecked economic, migration, and drug interference and to stamp out malign influence from extra-hemispheric powers, trans-national criminal organizations and rogue regional actors alike. by those outside the hemisphere. The United States does not—and has never—sought a closed economic system in the Western Hemisphere, but we will no longer permit foreign adversaries to use commerce and investment as a stalking horse for control of the region's critical infrastructure and strategic territory, including

vital chokepoints like the Panama Canal.

For that reason, we will prevent such control and roll it back where it has already occurred, and we will do so regardless of whether that control is exercised directly by competing powers or instead through purportedly private entities that operate under those states' thumbs. We will also oppose predatory loans and other instruments of debt that threaten to ensnare our neighbors and subject them to the control of foreign adversaries. For neighbors already caught up in such schemes, we will sever these financial leashes by using the full array of our country's economic instruments, including foreign assistance, loans, and private-sector partnerships.

Objective 2.2: Strengthen strategic partnerships in the Western Hemisphere.

Central to our efforts in the Western Hemisphere will be providing alternatives—either commercial, security, or otherwise—to our neighbors in the region. The Department will accordingly work with our regional partners to stand firmly against foreign interference and to uproot it where necessary. Our allies will no longer feel isolated against China or any other extra-hemispheric power, and the United States will remain the region's partner of choice on the issues that matter most. Even amid any intra-regional disagreement, it should always remain common ground that no one's interest would be served were the Western Hemisphere to become a theater of serious great-power competition. On the contrary, the United States, by keeping outside great powers at ocean's length, lays the groundwork for the entire region's security and prosperity.

The Department must not just reinforce bonds with existing allies, but expand to new partners throughout the region. For too long, our neighbors have been neglected as the United States has been distracted by a never-ending series of crises elsewhere. We will reverse that neglect and restore regional allies to their rightful role as our strategic partners. In that capacity, we will cooperate on issues of mutual concern, including combatting intra-regional challenges like narcotics trafficking. We will also prioritize trade deals in the Western Hemisphere and near-shore key industries in neighboring countries with comparative advantages—not as charity, but because doing so improves the security of our own supply chains. Our policies will pay dividends for the region as well as for the American people and thereby secure lasting advantages to both.

Objective 2.3: Suppress narco-terrorist gangs and cartels.

Prior to this Administration, our country was under siege by narco-terrorist gangs and cartels that killed over 87,000 Americans every year through the deadly drugs they trafficked. In addition to directly harming our people, these organizations fueled destabilizing crime, addiction, and corruption across the region.

We will no longer tolerate this scourge or the extra-hemispheric entities and states that often enable and profit from it. We will recognize cartels and gangs as the foreign terrorist organizations that they are. We will continue to apply sanctions and other economic tools against these entities—as well as against any state or non-state actors who provide them succor. Finally, we will not hesitate to use force if necessary and appropriate.

We will not undertake this battle alone. We will partner with our neighbors to improve their counterterrorism and security capabilities, including through access to and training with our armed forces and law enforcement.

Goal 3:
Peace and Stability in the Indo-Pacific Region

How the United States responds to the rise of China will be the defining story of the 21st century. This is due not only to the global nature of economic competition, but to the U.S.' own national interests in the Indo-Pacific. The United States is a Pacific nation and has traded there practically since our founding. Asia is already the source of nearly half of the world's gross domestic product by some estimates, and crucial sea lanes and supply chains crisscross the region. Further, we count other Indo-Pacific nations as some of our closest allies. We are unambiguous that regional peace and stability benefit the United States irrespective of competition with countries such as China. We seek closer economic and military ties with Indo-Pacific allies and partners that benefit U.S. strength, not which come at our expense.

Although the United States and the West have made decades of strategic mistakes regarding China—whether through instances of unfettered access to our capital markets, encouraging our businesses to invest without discretion, or outsourcing our manufacturing capacity—we retain the foundations of dynamism, vibrancy, and innovation which will allow us to reassert our economic independence.

With this confidence in our 250 years of freedom and independence, we are clear that in our competition with China we do not seek to create instability. Instead, as with America First foreign policy everywhere, we will pursue policies in the Indo-Pacific that support economic strength in our own country and deter aggression abroad. When the United States is economically, militarily, civically, and morally sound, we can outlast any competitor and dissuade them from military adventurism.

Objective 3.1: Strengthen the Indo-Pacific economic system to support U.S. reindustrialization and reinforce ties with allies.

The United States will advance an economic system in the Indo-Pacific that is both free from external coercion and open to the American people. We will advance policies in the region that support U.S. reindustrialization through broad commercial advocacy efforts, the development of secure and resilient supply chains, and the spread of American and trusted alternatives to Chinese-created dependencies. As President Trump has stated publicly, we will combat Chinese intellectual property theft, and counter predatory state-directed economic strategies.

The United States will also seek to build and reinforce our allies and partners in the region through fair, high-impact bilateral trade deals to advance shared prosperity. We will support efforts by innovative American companies to win markets across the Indo-Pacific region and removal of bureaucratic red tape that restrict our companies. We will support allied investment in the United States and collaboration between the United States and allied companies, provided they do not result in further deindustrialization. We will identify and counter attempts to evade U.S. tariffs through third-country transshipment. We will seek partnership with growing regional economies such as India, but on terms that advance U.S. security and economic interests and avoid repeating past mistakes.

We will promote our role as the energy and technology partner of choice in the Indo-Pacific.

We will prioritize innovative deals to secure critical minerals and will work closely with allies and partners to protect our technological advantages and safeguard our innovation from hostile exploitation. We will also use existing mechanisms, such as the Quadrilateral Security Dialogue, to drive American and allied regional priorities and counter attempts by China to establish a hostile and exclusionary economic system.

Objective 3.2: Deter aggression and establish favorable military balance across the region.

The United States must establish a favorable military balance in the Indo-Pacific to keep the trade routes free and open and to deter aggression. Over the past decade, China has undertaken an unprecedented military buildup which the United States must highlight publicly and remain prepared to counter.

We will secure the vital lanes of commerce which run through the region, keeping them open for our ships to navigate unimpeded. If obstructed, we will ensure the United States has appropriate capacity to counter these efforts so that these crucial lanes are not able to be taxed or closed by any one country.

The Department will work to deepen relationships with allies and encourage them to increase their own spending, to invest in deterrence measures, and to allow U.S. military greater access to critical infrastructure and resources. In turn, we will provide allies increased access to our revitalized Defense Industrial Base. We will promulgate with allies, partners, and adversaries alike that the United States maintains a strong interest in a peaceful and prosperous Indo-Pacific and desires neither war nor regime change. We will consistently seek open lines of communication with China and means to reduce misunderstandings and risks. We will champion reliable U.S. defense companies and support defense industry interoperability and collaboration between not just the United States and Indo-Pacific allies, but also with reliable European partners. An integrated Defense Industrial Base will provide the United States and our allies with strategic productive depth in the event of conflict.

Goal 4:
Rebuild the Civilizational Alliance with European States

The nations of Europe are America's oldest allies. The United States was born of Western European parentage and, far beyond mere geopolitics, we are bound to Europe through shared traditions, cultural heritage, political values, and familial ties. To succeed against today's challenges, the United States must help European partners recommit themselves to a new American transatlantic civilizational alliance.

For the bulk of the twentieth century, Europe was the primary theater for great power competition, with the United States standing with allied nations against imperialistic and anti-democratic powers like the Axis and the Soviet Union. America built the post-war global architecture in service of this transatlantic partnership, leveraging it to become Western Europe's primary security guarantor, financial backstop, and geopolitcal pole in the fight against communism. Together with the free nations of Europe, America defeated the USSR and freed the continent from the yoke of communist tyranny.

Over time, however, the resulting unification of Europe—infected with the dogma of the post-Cold War neoliberal moment—led to a weaker and poorer continent less capable of defending itself, much less joining to support American interests. Content to free-ride on U.S. security guarantees, European nations slashed their defense spending and let their militaries atrophy. Submitting to the unaccountable supranational regulatory bureaucracy of the European Union, the continent deindustrialized, failed to innovate, and slipped into economic malaise. European nations became increasingly reliant upon energy and imports from adversarial powers. EU principles regarding the free movement of people were weaponized to flood Europe with waves of non-assimilated foreign migrants, diluting the bonds of culture, community, and history that sustained historic polities. Meanwhile, the elite came to espouse increasingly radical conceptions of globalism and pan-humanism that led them to reject and undermine the core tenets of Western civilization: Western faith and values, national sovereignty, free expression, free markets, and belief in the polity.

It is time for European nations to wake up. Russia's invasion of Ukraine demonstrated that Europe continues to face grave security threats and must re-militarize to ensure its security. Likewise, Chinese economic coercion has shown that European countries must also reindustrialize and deregulate to secure their economic future. Finally, a breakdown in public safety and social welfare has revealed that they must abandon the disastrous experiment of mass migration.

European nations must regain their strength to remain a useful partner for the United States. Critically, while the United States stands ready to help reverse the corrosive trends of the past three decades, we do not desire a return to either the European dependency of the Cold War or the instability of competing imperialisms that culminated in two world wars. Instead, we aim to empower European nations that are militarily capable, economically fair, and culturally aligned. This new slate of self-reliant and self-assured states will guard against both estrangement and decline, rebuilding a renewed transatlantic civilizational alliance fit for today's challenges.

Objective 4.1: Transfer primary responsibility for conventional European defense to allies and expand our joint Defense Industrial Base.

The United States benefits from a free and secure European continent but, as outlined in previous sections, we must prioritize our resources to support stability in regions such as the Western Hemisphere or Indo-Pacific. Nonetheless, our commitment to European security and prosperity is evidenced by our push for NATO allies to spend five percent of GDP on defense. This is something European nations must address urgently. Without demonstrable progress, the American people cannot continue to care more about the security of far-off nations than the citizens of those nations do themselves. We will push strongly for adherence to The Hague commitment; nations that continue to freeride will forfeit the benefits of friendship with the United States.

President Trump correctly foresaw the need for fellow NATO members to increase their own defense spending and has raised this publicly on numerous occasions. We will support NATO as the essential mechanism to guarantee shared deterrence, interoperability, and joint command, but need NATO to be a real alliance. As recent conflicts have clearly demonstrated, rhetoric does not win wars. The Department will advocate for the creation of tangible national capabilities as European states assume responsibility for their conventional defense and become net contributors to security in Africa and the Middle East. In the pursuit of these capabilities, we will champion reliable U.S. defense companies, resist efforts to divide the transatlantic Defense Industrial Base, and support defense industry interoperability and collaboration between not just the United States and European allies, but also those in the Indo-Pacific. An integrated defense industrial base will provide the United States and its allies with strategic productive depth in the event of conflict.

While strengthening NATO's deterrence in Europe, we will maintain dialogue with Russia, seek the normalization of diplomatic operations, and pursue strategic stability. We will seek the end of the Russia-Ukraine war and will commit diplomatic resources to avoid new conflicts in Europe. We will cooperate closely with European allies on security in the Arctic. As conditions allow, we will negotiate arms control for nuclear, chemical, and biological weapons.

Objective 4.2: Rebalance U.S. trade with European allies and decrease their economic dependencies on adversarial powers.

The United States will unapologetically pursue balanced, reciprocal trade with European nations. We will resist the EU's attempt to cast itself as a "regulatory superpower" and push back on rules which discriminate against U.S. businesses or have extraterritorial effects on U.S. consumers. The Department will encourage and support European investment in the United States and collaboration between U.S. and businesses in Europe, provided they do not result in further the deindustrialization of the United States. We will vigorously advocate for export opportunities on behalf of sound U.S. businesses.

The export of U.S. energy will be a central pillar in our economic collaboration with European nations. The United States has the resources to end energy dependency on Russia and spur economic growth. We will strongly support U.S. exports of natural gas, nuclear technology, and nuclear fuel, particularly in former Soviet-aligned states.

China's support for Russia and its invasion of Ukraine directly undermines security in Europe. The United States will support efforts to reduce dependence on China for critical supply chains and overreliance on China for economic growth.

Chinese economic leverage over European states erodes their reliability as U.S. allies. We will support the removal of Chinese hardware and software from critical infrastructure and collaborate closely with European partners to safeguard our joint technological advantages.

Objective 4.3: Defend civilizational values and reassert national sovereignty.

The United States and European nations must be civilizational allies, first and foremost. As such, the United States will condemn anti-democratic actions which restrict free speech or the free exercise of religion and will oppose the use of lawfare to ban political opponents. In healthy societies, citizens can decide for themselves which candidates, ideas, and political movements are worth selecting, without the need for globalist intervention or elite moderation.

Mass migration is a threat to national cohesion, social stability, and civilizational values and we will support European nations' increasing recognition of this. The Department will work with allies and partners to renegotiate the international consensus on asylum to enshrine common-sense principles and reassert the primacy of national sovereignty in decisions on migration.

Goal 5: U.S. Economic and Technological Dominance

The United States' unparalleled economic wealth and technological dominance are foundational to our geopolitical strength and a tremendous source of strategic leverage. In the 20th century, American manufacturing dominance powered our victories in war and our prosperity in peace. But as a result of short-sighted decisions at home and unfair competition abroad, the United States has lost much of our manufacturing base and is too often dependent on foreign countries for critically important inputs. The United States will rescue our industries from unfair trade practices and illegitimate competition, promote American businesses through commercial diplomacy, and firmly reestablish America as the economic and technological juggernaut of the 21st century. We will build on America's energy self-sufficiency established during the first Trump Administration and solidify America as the most dominant energy exporter in the world.

Objective 5.1: Reindustrialize the United States.

U.S. power lies in both our military dominance and our leadership of the global economy. In a geopolitical context driven increasingly by economic statecraft, the future of U.S. supremacy lies in our future productive power. On this front, our position as the country with the highest gross domestic product and leadership in financial markets obscures underlying fractures in the national health of our productive economy, especially in advanced manufacturing products and critical technologies that have implications for national security.

We will reindustrialize, especially at the cutting edges of economic development, and secure supply chains from dependence on adversaries. We will identify productivity-enhancing sectors and industries necessary for a vibrant economy, including energy, critical minerals, advanced manufacturing, robotics, machine tools, shipbuilding, material sciences, critical and advanced infrastructure, telecommunications, pharmaceuticals, medical devices, space and aerospace, semiconductors, compute, artificial intelligence (AI), data storage, transportation logistics, unmanned and autonomous systems, biotechnology, and quantum science.

Working in collaboration with the Department of Commerce, the United States Trade Representative, and other relevant agencies, we will identify dependencies in these areas and take steps to secure our supply chains and bolster our capacities. We will not allow our ability to obtain critical technologies to be based on the benevolence of adversaries and competitors. We will protect our industries from unfair trade and non-trade practices used by other countries to destabilize American manufacturing. This imperative is especially vital to the future of the Defense Industrial Base, which we will rebuild and promote to allies and partners worldwide.

We will also not relinquish global dominance of these markets to foreign powers. In addition to being vital to national security, increasing productive power and market share over strategic sectors will boost the entire American economy and create synergies with other sectors of the economy, providing tangible benefits to the entire U.S. labor force, financial markets, and the U.S. Treasury. The Department will mobilize U.S.

businesses and solutions as the preferred choice for allies and partners by pursuing commercial deals in all bilateral relationships and negotiations, thereby creating a strong economic bloc of pro-American countries that leverage American businesses and exports. We will enshrine a new economic security consensus across this bloc of partners and will unlock new commercial industries and opportunities through flagship infrastructure projects. Through the purchase American technology stacks and defense systems, this bloc will finance U.S. reindustrialization and ensure American economic and technological leadership continues throughout the 21st century.

Objective 5.2: Stop foreign actors' abuse of the global trading system.

The conventional consensus on trade policy is that free trade is mutually beneficial and that countries should pursue free trade wherever and whenever possible with few if any exceptions. However, the U.S. position in the global trade regime is lopsided with long-standing, historically large, persistent trade deficits with most countries. Foreign actors have exacerbated and artificially inflated these deficits through various unfair trade practices such as tariffs, import substitutions, currency manipulation, and tax penalties such as value-added taxes (VATs). As a result, the current trade system resembles nothing like truly free trade, and America has hemorrhaged manufacturing jobs and assets to pay for our trade deficits.

The United States cannot afford this arrangement any longer, and we will correct these abuses to ensure fair trade that corrects our trade deficits, bolsters our efforts to reindustrialize the United States, boosts U.S. productivity and the competitiveness of American companies, and prioritizes the American worker. The Administration will rectify our trade deficits through our reciprocal tariff regime and new trade deals that put American businesses first. Working with other agencies, we will work with U.S. businesses to investigate and respond to unfair trade practices that limit market access to other countries. To ensure these measures are effective, we will especially focus on transshipment, whereby countries evade tariff duties by routing their exports through third countries not subject to tariff regulations. As the Administration has already shown, we will impose punitive tariffs of 40% against countries that facilitate tariff evasion through transshipment and other regulations, such as goods made using forced labor. The Department will be vigilant in identifying and reporting these policies to the United States Trade Representative, and we will engage with countries to rectify these unfair practices.

The Department will ensure free and fair access to foreign markets by making commercial diplomacy the centerpiece of our economic strategy, and will help U.S. businesses secure foreign government contracts and tenders for key projects. Specifically, posts will encourage countries to reduce their dependence on Chinese investment offerings. The Department's commercial diplomacy strategy will involve identifying American alternatives to Chinese investment, develop new alternatives where they do not exist, and work with other agencies and other countries to encourage reliance on superior American offerings, especially in critical sectors such as AI. Diplomatic missions will also continually monitor and coordinate responses to ongoing Chinese economic coercion abroad.

Objective 5.3: Drive the United States's strategic leverage by increasing U.S. exports and investment.

Our efforts to increase U.S. leverage with strategic partners complements our efforts to reindustrialize, secure supply chains, and end abuses in the global

trade system. To deepen countries' economic connection to the United States and reduce their dependence on China, we will reindustrialize and become the world's factory in the most critical sectors that determine the shape of the global economy. Reindustrialization will be driven through incentives and benefits that only accrue to U.S.-based businesses which hire American workers and develop the dynamism and resilience of the American economy. Taken together, our trade and industrial policies will be mutually reinforcing.

The Department's economic strategy will promote American exports and opening foreign markets to U.S. businesses. Posts will collaborate and coordinate with Departmental bureaus to identify and secure opportunities, especially where the U.S. market has competitive advantages, such as AI, energy, weapons systems, capital markets, and as we increasingly reindustrialize, advanced manufacturing goods.

In collaboration with the Department of Energy, the Environmental Protection Agency, and the Department of Commerce, we will promote American energy production and export to the rest of the world, thereby achieving the Administration priority of energy dominance while driving down energy prices worldwide.

As part of the Department's participation in the Committee on Foreign Investment in the United States, we will also encourage continued foreign investment into the United States. However, such foreign investment must focus on development of domestic capacities and industry rather than acquiring American assets. We will promote targeted U.S. investments in strategic countries to expand market access for U.S. exports and enhance U.S. control and influence over key nodes and chokepoints in the global trading system. We will also take steps to ensure that the U.S. Dollar remains the global reserve currency and the trade medium of the global economy, thereby avoiding the security and economic implications of de-dollarization.

The Department will take leadership of efforts to promote the export and control of the American AI tech stack to trusted partners, such as Israel or others across the globe. As one of our greatest competitive advantages, AI is a key industry that other countries want and need; in exchange, we will ensure that only trusted partners enjoy these technologies, and that untrusted foreign technology does not proliferate at the risk of our security or influence.

Objective 5.4: Strengthen U.S. technological edge and industry dominance.

The United States extends our national power through a confluence of economic productive power, military power, and technological innovation. We must therefore outcompete our rivals in technological development and dominance to win in the economic and military spheres as well. We will accomplish this by protecting our advantages and leadership in the science and tech ecosystem while also promoting U.S. technology exports to lead global market share.

We will prevent our adversaries from gaining access to U.S.-developed and produced technologies, whereby they steal our trade secrets and use our technologies to beat us, including through dual-use applications that enable foreign militaries to threaten our national security. The Department will work with the Department of Commerce and other agencies to ensure that AI and other cutting-edge technologies are only licensed and exported to allied and partner countries that are secure and free of adversarial technologies or influence. We will monitor export licenses to ensure continued compliance with the

terms of licensure so that no technology or trade secrets leak outside of the U.S. ecosystem.

Protecting U.S. technology will not guarantee industry dominance if we do not also export our technologies abroad in place of adversaries. As instructed by President Trump's Executive Order on AI exports, the Department will lead efforts with other agencies to aggressively promote the export of our technologies to as many trustworthy markets as possible to dominate global market share and build U.S.-aligned ecosystems. Specifically, we will work with U.S. companies to identify use cases and applications, coordinate synergies between different parts of the AI architecture (e.g. semiconductors, compute, data centers, software, etc.) and negotiate deals abroad.

To promote the adoption of U.S.-preferred technology standards, we will exercise strong leadership in international fora by working with partners to advance our preferences and see them adopted. We will expect partners using American technology to prefer these standards and will make licenses contingent on support at fora like the International Telecommunications Union. Where there are weaknesses in international coordination that the United States can strengthen, we will create new fora where we can exercise strong leadership.

We will also court investment in advanced technology research and development. There is an ongoing need for research at the frontiers of scientific study and the cutting edge of technology products that will shape the future of the American economy, such as in biotechnology, semiconductors, quantum, and terrestrial and space-based telecommunications architecture. We will win the present while laying the foundation to win the future by courting productive foreign investment from trusted partners. Additionally, we will support and coordinate between business partners, national labs, and educational institutions that drive research and applications. Where we lack specialized expertise, we will attract it from abroad while protecting our research and intellectual property.

Goal 6: Targeted Foreign Assistance that Puts American Interests First

Foreign assistance has long been a limited but crucial tool of American foreign policy. From Lend-Lease to the Marhsall Plan to the Cold War fight against Communism, strategically minded assistance programs have deployed American resources to bolster allies, lead pro-U.S. development, save lives, and promote our values.

Sadly, our wayward foreign aid architecture long ago abandoned strategic discipline and the national interests of the United States. This drift was best exemplified by the United States Agency for International Development (USAID). Established to respond to urgent humanitarian crises and help poorer allies find durable growth, USAID came to view its core constituency as the global humanitarian community rather than the American nation or people. USAID has been eliminated, and its foreign assistance programs have been realigned under the State Department. Our mandate is clear: deploy assistance resources prudently and strategically, towards a more targeted set of high-impact programs that advance core diplomatic priorities.

The Department's ongoing assistance programs fit into two basic categories: (1) lifesaving programs and (2) strategic investments. Lifesaving assistance includes time-limited health and humanitarian programs, such as disaster response, food security initiatives, and efforts to combat deadly diseases. Strategic assistance advances longer-term U.S. interests by providing allies with security assistance, foreign military financing and economic support and by promoting commercial and trade ties through programs that facilitate market access and U.S.-led infrastructure development. Both forms of assistance will be guided by the same set of overriding principles.

Objective 6.1: Leverage assistance as a tool of statecraft.

American sovereign resources belong to the American people and must be spent to advance their interests and those of our nation. No foreign government, population or instrumentality has a preordained right or claim to U.S. funding. Foreign assistance is a tool of American diplomacy and statecraft—and every dollar we spend on it must be directly justified on those terms. Operationalizing this commitment starts with a few basic principles.

For too long, assistance justified on globalist or humanitarian bases benefitted groups unfriendly to the United States. No longer. When evaluating assistance programs, we will start by ensuring it is going to groups or countries that actively advance our interests. Relevant factors will include military and security ties, cooperation on national security and migration / remigration priorities, voting in international organizations, and fair economic or trade interconnections.

We will also deploy assistance to advance discrete and time-bound objectives and will quickly and effectively leverage assistance as a tool to advance discrete U.S. economic, security, and diplomatic objectives. Our assistance dollars will be more flexibly deployed in connection with emerging diplomatic negotiations, to meet urgent national

security needs, to help U.S. businesses contest global deals, to identify and secure vital supplies of critical minerals, to secure bilateral cooperation on migration and remigration agreements, and to deny our adversaries key geopolitical goals or priorities.

Finally, refocusing on strategic objections will require realigning resources to priority regions and areas. In 2024, USAID spent just 10-15% of its assistance budget in the Western Hemisphere and Asia-Pacific combined. That is an unacceptable allocation of scarce resources given U.S. strategic priorities. Accordingly, the Department will aim in 2026 to spend at least 40% of our overall assistance budget in the Western Hemisphere and East Asia regions. Even within administratively grouped regions, we will ensure that country and sub-regional allocations of assistance reflect contemporary developments and strategic priorities.

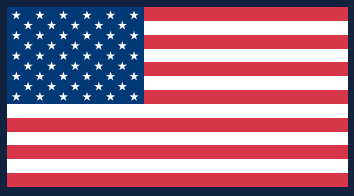
Objective 6.2: Promote and provide trade, not aid.

Private sector economic cooperation is at the center of the America First foreign policy agenda—as is the proven belief that real development and prosperity is driven by trade, private sector growth, investments in innovation, and by efficient markets. Developing nations want help fostering self-reliant growth, not assistance programs designed to create reliance on multilateral institutions and global non-profits. This simple truth ought to be reflected in our developmentally oriented foreign assistance programs.

Our America First foreign assistance strategy will leverage assistance resources to champion American enterprise and infrastructure. We will make investments in exporting cutting-edge American technology—especially in healthcare, communications, software, energy, and transportation—that will bring developing nations into the 21st century economy and solve local humanitarian, governance, and economic problems all around the world. And we will secure local buy-in, catalyze private capital, and ensure that development projects benefit from the discipline of market principles.

These new forms of assistance will help us better compete with our adversaries who seek to leverage investment to assert control over various developing economies. If done correctly, U.S. investments built on private sector principles of fair exchange, local control and mutual benefit will offer a clear contrast—and more appealing alternative to—exploitative models such as Chinese debt-trap diplomacy.

Leveraging assistance for commercial diplomacy will require significant shifts in the way we program and plan assistance. We will diversify our implementing partner set away from the non-profit and international organization sectors and towards the American business community. To effectively work with the private sector, we will also update our procurement to market standards. We will need to work closely with partner governments to ensure local buy-in, regulatory harmonization and co-investment. And we will be more agile in our assistance programming so as to more quickly and opportunistically take advantage of competitive dynamics, market conditions, and unfolding geopolitical events.




DEPARTMENT OF STATE
UNITED STATES OF AMERICA

Case No. 1:26-cv-815 (JEB)

EXHIBIT 23

← **Post**

Under Secretary of State Sarah B. Rogers
@UnderSecPD

As @SecRubio has noted, today's list is illustrative not exhaustive. We stand "ready and willing to expand" it.



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