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WWW.WC.COMEDWARD BENNETT WILLIAMS (1920-1988)
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November 25, 2024

Via EmailWanda D. Brown, Esq.
Assistant General Counsel
Federal Election Commission
1050 First Street, N.E.
Washington, DC 20463
cela@fec.gov

Re: MUR 8342 (Center for American Rights, Complainant and The Washington Post, Respondent) and MUR 8343 (Donald J. Trump for President 2024, Inc., Complainant and The Washington Post and Harris for President, Respondents).

Dear Ms. Brown:

This law firm is counsel for WP Company LLC, d/b/a The Washington Post (“The Post”). I write on behalf of The Post in response to two complaints submitted to the Commission on October 31, 2024 and received by The Post on November 7, 2024, one by the Center for American Rights (MUR 8342) and one by Donald J. Trump for President 2024, Inc. (MUR 8343) (the “Complaints”).¹ The Complaints both allege unlawful campaign-related spending by The Post based on its paid promotion on Facebook of its own news articles. Specifically, the Complaints allege in-kind contributions to Vice President Kamala Harris’s presidential campaign in violation of 52 U.S.C. § 30118 and 11 CFR § 100.73, or independent expenditures supporting the campaign in violation of 52 U.S.C. § 30104(g)(1) and 11 CFR § 100.132, because the promoted articles supposedly boosted Harris while denigrating her opponent, now-President-elect Trump. MUR 8342 ¶¶ 2–3; MUR 8343 at 1, 5. These allegations are wholly without factual support or legal merit, and the Commission should dismiss the Complaints.

BACKGROUND

Like many other news organizations, The Post promotes some of its news articles on Facebook and other social media platforms. Declaration of Karl Wells ¶ 5 (“Wells Decl.”). This simply means that news organizations like The Post pay platforms like Facebook so that their

¹ On November 20, 2024, FEC staff extended The Post’s deadline to respond to November 25, 2024.

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news articles appear more often in the social media “feeds” of users, which helps to drive readership to the news organization. *Id.* at ¶ 6. A promotional Facebook post linking to a Post news article looks very similar to a regular post linking to a Post news article that appears organically in a Facebook user’s feed. A header clearly discloses—in a manner established by the platform—that the promoted article was “Sponsored – Paid for by Washington Post.” *Id.* at ¶ 8.

Exhibit A – Organic Article on Facebook

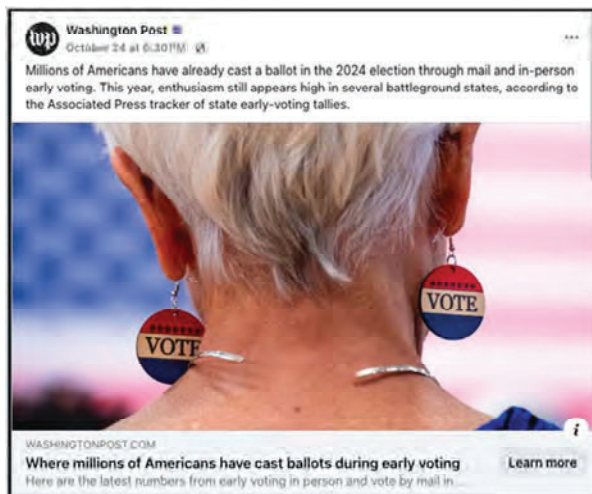
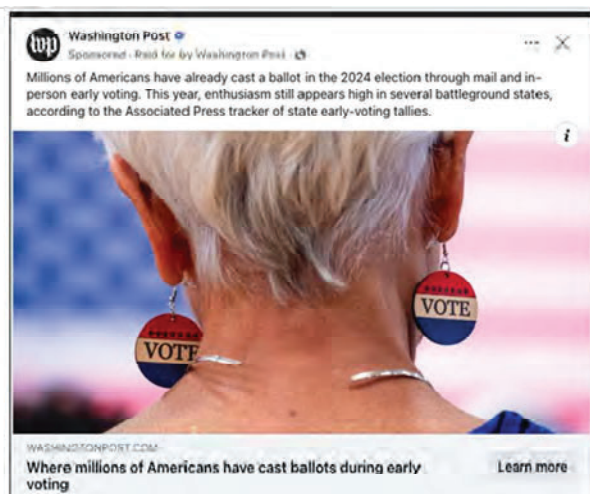


Exhibit B – Promoted Article on Facebook



The Post promotes a wide variety of its most popular news content on Facebook. Wells Decl. ¶¶ 5, 16–17. The Post chooses what articles to promote to support its news business, and based on its judgment of what will be most interesting to readers. *Id.* at ¶ 11. The Post makes these decisions internally and without coordination with any outside party (including any political campaign). *Id.* at ¶ 12. The overwhelming majority of the articles that The Post promotes on Facebook are not related to politics. *Id.* at ¶ 13. For example, during the lead-up to the recent presidential election, more than 95% of the articles The Post promoted on Facebook were not about politics. *Id.* at ¶ 15; Exhibit C (promoted Post article titled “‘Electroculture’ gardening is trending. But does it work?”).²

² As supposed evidence of coordination, one Complaint points to an instance in which The Post quoted the Harris campaign in a news article that was among the articles The Post later promoted on Facebook. MUR 8343 at 3. But The Post as part of its journalism regularly quoted both the Harris and Trump campaigns in its news articles, including articles it later promoted on Facebook. That is journalism, not campaign coordination. *See, e.g.*, Exhibit D (promoted Post article titled “The ‘feral 25-year-olds’ making Kamala Harris go viral on TikTok”); Exhibit E (promoted Post article titled “What Trump has promised to do on ‘day one’ as president,” quoting Trump campaign spokeswoman Karoline Leavitt’s statement that Trump “delivered on his first term promises to build the wall, rebuild the economy, and make America respected again on the world stage—and he will deliver on his promises in a second term as well.”).

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On October 31, 2024, the Center for American Rights and Donald J. Trump for President 2024, Inc. filed similar complaints with the FEC alleging that The Post had committed federal election law violations by promoting articles “critical” of President Trump, MUR 8342 ¶ 2; MUR 8343 at 1, 5, while “presenting a fawning portrait of Vice President Harris,” MUR 8343 at 5. The Complaints were solely based on an October 30, 2024 article on the news site Semafor that had reported on The Post’s promotion of articles on Facebook. MUR 8342 ¶ 3; MUR 8343 at 1–2.

The Complaints’ allegations are speculative and factually incorrect. They fail to acknowledge that Semafor explained that it is standard practice in the news industry to promote articles on social media. Exhibit F (“Like many news organizations, the Post pays a small amount each month to show articles in feeds on Facebook and other social media platforms.”); Wells Decl. ¶¶ 5–7. And they ignore The Post’s explanation for its promotion, also published by Semafor, which disproves the allegations: “the paper promotes highly-trafficked stories that have already performed well.” Exhibit F; Wells Decl. ¶¶ 11, 16–17. In fact, the vast majority of news articles that The Post paid to promote were not even about politics at all. Wells Decl. ¶¶ 13–15.

ARGUMENT

As both a factual and legal matter, the Complaints are wholly without merit and should be dismissed. This is so for three separate and independently sufficient reasons. First, the Complaints’ factual allegations are incorrect; The Post did not promote articles on Facebook in service of any candidate, but rather, to gain readers and subscribers. This promotion of The Post’s own articles, chosen based on reader interest, does not violate any rule regarding in-kind corporate contributions or independent expenditures. Second, the Commission’s press exemption prohibits a finding of a violation because the underlying conduct being promoted by The Post—The Post’s journalism—is a “legitimate press function.” Third, the First Amendment independently protects The Post’s promotion of its news articles from a finding of a violation. Accordingly, there is no “reason to believe” a violation occurred, and The Post requests that the Commission dismiss the Complaints. 52 U.S.C. § 30109.

I. The Complaints Should Be Dismissed Because They Are Factually Erroneous and Fail to Establish any Violation Occurred.

The allegations in the Complaints are speculative and demonstrably false. They should be dismissed because they are “based solely on conjecture that a violation may have occurred.” *FEC v. Phillips Pub., Inc.*, 517 F. Supp. 1308, 1314 (D.D.C. 1981). While the Complaints claim both in-kind and independent expenditure violations, they fail to establish either. This is hardly surprising, as the Complaints are based on mischaracterizing common and appropriate practices in journalism as unlawful campaign spending.

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As The Post’s attached declaration demonstrates, The Post did not promote its news articles in order to support any political campaign. Wells Decl. ¶¶ 12, 18. Instead, it paid to increase the distribution of its news articles—which were overwhelmingly concerned with topics unrelated to politics—to an audience of social media users. *Id.* at ¶¶ 5–6, 13–15. The Post selected its articles to promote because they were popular and interesting to its readers. *Id.* at ¶¶ 5, 11, 16. This is standard practice in the news industry. *Id.* at ¶¶ 5–7; *see also* Exhibit F (Semafor article reporting that “*Like many news organizations*, the Post pays a small amount each month to show articles in feeds on Facebook and other social media platforms.”) (emphasis added).³ It is not a campaign finance violation.

These facts support neither an in-kind contribution nor independent expenditure violation.

First, the Post’s paid promotions are not in-kind contributions. To have made an in-kind contribution, The Post must have “materially involved” the Harris campaign in its decision to promote certain articles on Facebook. 11 C.F.R. § 109.21(d)(2); 52 U.S.C. § 30118(a). But the Harris campaign had absolutely no involvement whatsoever with The Post’s promotion of its news articles on Facebook. Wells Decl. ¶¶ 12, 19. The Harris campaign had no influence over “the timing or frequency of the communication[s],” or any other aspect of the promotions. 11 C.F.R. § 109.21(d)(2). The Complaints’ allegations to the contrary are supported by nothing more than speculation, and are demonstrably false. That in one or more of the hundreds of articles that The Post later promoted on Facebook, The Post reported on certain statements from a political campaign, MUR 8343 at 3, does not show that the campaign being reported on was “materially involved in” any journalistic “decisions,” 11 C.F.R. § 109.21(d)(2). Rather, it simply shows that The Post was reporting on the campaigns contesting a presidential election, and promoting its journalism. For example, The Post also promoted articles that quoted the Trump campaign, but that does not mean it coordinated its promotional efforts with that campaign, either. Wells Decl. ¶¶ 12, 17, 19; Exhibit E. The Complaints’ assertions of coordination by The Post with a presidential campaign are irresponsible and utterly false.

The Complaints are also wrong to contend that The Post’s paid promotion of its own articles was a prohibited independent expenditure. To be a reportable independent expenditure, the communication at issue must be “express[] advoca[cy]” that “could *only be* interpreted by a reasonable person as containing advocacy” for one candidate “because ... [r]easonable minds could not differ” that it advocates for one candidate. 11 C.F.R. § 100.22 (emphasis added); 52 U.S.C. § 30104(g)(1). The Commission has labeled this a “high standard” when deciding whether political “ads ... reach th[e] high bar.” Statement of Reasons of Chairman Sean J. Cooksey and Cmr. Allen J. Dickerson, Dara Lindenbaum, and James E. “Trey” Trainor, III, at

³ For example, multiple media organizations promoted themselves through posts that were arguably supportive of the Trump campaign. *See, e.g.*, Exhibit G (Fox News promoting an “exclusive[]” interview with “Donald Trump”); Exhibit H (Daily Caller advertisement promoting a documentary called “Cleaning Up Kamala”).

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6, MURs 8215, 8216 (Last Best Place PAC). Here, the Semafor article cited in the Complaints itself called The Post's coverage of Vice President Harris in the paid promotions "*relatively neutral*," Exhibit F (emphasis added), not "fawning" as described in one Complaint, MUR 8343 at 5. The "only" reasonable interpretation is what the facts show to be the truth: The Post promoted its most popular articles without "express advocacy" for any campaign.

II. There Is No Violation Because the Press Exemption Protects the Press' Marketing of Its News Content.

The Complaints also fail because The Post's promotional conduct is protected by the Commission's broad press exemption. The exemption provides that "[a]ny cost incurred in covering or carrying a news story ... by any ... newspaper" does not qualify as a "contribution," 11 CFR § 100.73, or an "expenditure unless the facility is owned or controlled by any political party, political committee, or candidate," 11 CFR § 100.132; *see also* 11 CFR § 100.73. In creating the press exemption, Congress wanted to "assure[] the unfettered right of the newspapers ... and other media to cover and comment on political campaigns," H.R. Rep. No. 93-1239, 93d Cong., 2d Sess. at 4 (1974); *see also* Advisory Op. 2005-16 at 5 (Fired Up!).

An undisturbed line of Commission and federal court decisions holds that the press exemption protects a news organization's ability to market its news content, including on social media, where the "underlying product" is a "legitimate press function." Advisory Op. 2010-08 at 7 (Citizens United); *see also, e.g., Phillips Pub.*, 517 F. Supp. at 1309, 1313 (applying press exemption and prohibiting the Commission from investigating because "the purpose of the [complained of] solicitation letter was to publicize [a newsletter] and obtain new subscribers, both of which are normal, legitimate press functions."); *Reader's Digest Ass'n, Inc. v. FEC*, 509 F. Supp. 1210, 1214–15 (S.D.N.Y. 1981) (noting advertisement for article would be covered by press exemption if article itself was part of a "legitimate press function"). For example, the Commission recently dismissed a complaint about Courier Newsroom paying to promote articles primarily supportive of Democratic candidates for the 2020 election on Facebook because "even [the] election-focused articles" being promoted "would qualify as a 'legitimate press function.'" First General Counsel's Report at 19, MUR 7789 (Courier Newsroom, Inc., et al.) ("Courier Newsroom"); Certification, MUR 7789 (Courier Newsroom, Inc., et al.).

Here, The Post's paid promotion of posts linking to the actual news articles that appear on its website qualifies as a "legitimate press function" because the promotion presents to readers the actual journalism "ordinarily issued by" The Post. Advisory Op. 2011-11 at 7 (Viacom); *see also FEC v. Mass. Citizens for Life*, 479 U.S. 238, 250–51 (1986). Indeed, this matter is an easier case than Courier Newsroom, because The Post's promoted news content at issue was overwhelmingly unrelated to political issues, and featured promotion of coverage of more than one candidate. Wells Decl. ¶¶ 13–17. As in that case, The Post's underlying articles must "qualify as a legitimate press function." Courier Newsroom at 19; *see* Advisory Op. 2010-08 at 7 (Citizens United).

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The Complaints ask the Commission to depart from its precedent by arguing the press exemption's plain language should not cover paid promotions. MUR 8342 ¶¶ 10, 12–21; MUR 8343 at 5. They are wrong. The regulatory press exemption covers “[a]ny cost incurred” in “covering or carrying a news story.” 11 C.F.R. §§ 100.73, 100.132. Paying to increase the distribution of a news article is a “cost” that media entities “incur[]” in publishing the news. Wells Decl. ¶ 7; *see, e.g.*, Courier Newsroom at 19.⁴

III. The First Amendment Otherwise Bars the Complaints.

The First Amendment in any event independently protects The Post from a finding of an election law violation here. There is “practically universal agreement that a major purpose of [the First] Amendment was to protect the free discussion of governmental affairs. This of course includes discussions of candidates, structures and forms of government, the manner in which government is operated or should be operated, and all such matters relating to political processes.” *Mills v. Alabama*, 384 U.S. 214, 218–19 (1966). Such protection from regulation includes choices about how to format the newspaper and how to “exercise ... editorial control and judgment.” *Miami Herald Pub. Co. v. Tornillo*, 418 U.S. 241, 258 (1974). Those protections extend to how a newspaper markets its editorial content because “a promotional use ‘is a necessary and logical extension of the clearly protected editorial use of the content of the publication.’” *Leddy v. Narragansett Television, L.P.*, 843 A.2d 481, 490 (R.I. 2004) (quoting *Velez v. VV Publ’g Corp.* 524 N.Y.S.2d 186, 187 (App. Div. 1988)); *Montana v. San Jose Mercury News*, 34 Cal. App. 4th 792, 797 (1995) (“a newspaper has a constitutional right to promote itself by reproducing its originally protected articles or photographs”). *See also* Advisory Op. 2010-08 at 7 (Citizens United); Courier Newsroom at 19.

⁴ The CAR Complaint cites two cases to argue that the press exemption should not apply. Neither case supports its argument. First, in *McConnell v. FEC*, the Supreme Court stated that the press exemption was narrower than a sweeping rule that would have given media “*carte blanche*” to engage in political spending just because they are media companies. 540 U.S. 93, 208 (2003), *overruled by Citizens United v. Fed. Election Comm’n*, 558 U.S. 310 (2010). But the Court agreed that the exemption applies to “news items and commentary,” *id.*, which is what the promoted Post articles are. Indeed, the Commission has consistently emphasized that it has interpreted the press exemption “*broadly*, mindful of Congress’s expressed intent that the Act not limit or burden in any way the First Amendment freedoms of the press and of association.” Courier Newsroom at 20 (emphasis added) (citing H.R. Rep. No. 93–1239, 93d Cong., 2d Sess. at 4 (1974)); Advisory Op. 2010-08 at 6–7 (Citizens United); Advisory Op. 2011-11 at 7 (Viacom). Second, the Complaint cites *Citizens United v. Gessler*, 773 F.3d 200, 218 (10th Cir. 2014), a case concerning the Colorado Constitution and a Colorado statute, not the Commission’s press exemption at issue here. *Id.* at 203 (citing Colorado’s constitution and its Fair Campaign Practices Act). But that case expressly declined to reach the question of whether the Colorado “media exemption [c]ould also apply to a media entity’s own advertisements.” *Id.* at 218 n. 10.

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At least two federal courts have also warned that Commission investigations into press advertisements would interfere with the news entities' First Amendment rights. After a party complained that Reader's Digest made an illegal corporate expenditure by producing and distributing video tapes of a reenactment of Senator Ted Kennedy's famous car crash on Chappaquiddick Island, the court said the press "exemption ... barr[ed]" any inquiry by the Commission into how the magazine "publicize[d]" the video and warned that "investigation of the press" "substantially erode[s]" "freedom of the press," especially because the Commission was "investigating the press in connection with the dissemination of political matter." *Reader's Digest*, 590 F. Supp. at 1214–15. Another court similarly cautioned the Commission "would impinge upon First Amendment freedoms" if it investigated a newsletter that solicited subscriptions with an advertisement that advocated against the election of Senator Kennedy. *Phillips Publishing*, 517 F. Supp. at 1314.

So too here. The Post's promotion of its political coverage is protected by the First Amendment.

The Complaints fail to provide "reason to believe" that a violation has occurred and should be dismissed. 52 U.S.C. § 30109.

Sincerely,



Nicholas G. Gamse



FEDERAL ELECTION COMMISSION
 1050 First Street, NE
 Washington, DC

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

E-MAIL: cela@fec.gov

AR/MUR/RR/P-MUR# 8342, 8343

Name of Counsel: Nicholas G. Gamse

Firm: Williams & Connolly LLP

Address: 680 Maine Avenue, S.W.

Washington, DC 20024

Office#: 202-434-5690

Fax#: 202-480-8371

Mobile#: [REDACTED]

E-mail: ngamse@wc.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/25/2024

Date

[Signature]

(Signature - Respondent/Agent/Treasurer)

James McLaughlin

(Name - Please Print)

Deputy General Counsel

Title

RESPONDENT: WP Company LLC d/b/a The Washington Post
 (Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 1301 K St. NW
 (Please Print)

Washington, DC 20071

Home#: _____

Mobile#: _____

Office#: 202-334-7198

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E-mail: James.McLaughlin@washpost.com

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

BEFORE THE FEDERAL ELECTION COMMISSION

)
) **MURs 8342, 8343**
)

DECLARATION OF KARL WELLS

I, KARL WELLS, declare as follows:

1. I submit this declaration in support of the response of WP Company LLC, d/b/a The Washington Post (“The Post”) to the above-captioned complaints filed with the Federal Election Commission on October 31, 2024 by the Center for American Rights and Donald J. Trump for President 2024, Inc. I have personal knowledge of the facts set forth herein except to the extent that matters of public record are set forth.
2. I am the Chief Growth Officer at The Post.
3. The Post publishes news via its widely read daily newspaper and website.
4. The Post is a wholly owned subsidiary of Nash Holdings LLC, which is privately held. The Post is not owned or controlled by any political party, political committee, or candidate.
5. Like many other news organizations, The Post promotes a wide variety of its most popular news content on Facebook and other social media platforms.
6. This means that The Post pays platforms like Facebook so that Post news articles appear more often in the “feeds” of Facebook users, which helps to drive readership to The Post.
7. Paying to promote news articles is thus a cost that many media entities incur in the course of publishing their news.
8. A promotional Facebook version of a post linking to a Post news article looks very similar to a post linking to a Post news article that appears organically in a Facebook user’s

feed. A header on promoted post says that the post is “Sponsored – Paid for by Washington Post.”

9. Exhibit A is a true and accurate copy of Washington Post news article that has been served organically in a user’s news feed.

10. Exhibit B is a true and accurate copy of the same Washington Post news article after The Post promoted it in a user’s news feed.

11. The Post chooses what articles to promote as a function of its news business, and its judgment of what will be most interesting to readers.

12. Those decisions are made internally at The Post and are not coordinated with any outside party (including any political campaign).

13. The overwhelming majority of the articles that The Post promotes on Facebook are not related to politics.

14. The Post paid to advertise certain news articles on Meta (Facebook) in October 2024.

15. In the lead-up to the 2024 election, over 95% of the articles promoted by The Post were not related to politics.

16. The Post’s advertising promoted high-performing news articles.

17. While some of the articles promoted on Meta concerned Vice President Harris and President Trump, that is because the articles were among the most popular on The Post’s website.

18. The Post did not promote articles for the purpose of supporting or opposing any political candidate.

19. The Post made its choices about promoting articles internally and did not coordinate its advertisements with the presidential campaigns of Vice President Harris or President Trump.

20. Exhibit C is a true and accurate copy of a promoted Washington Post article titled “‘Electroculture’ gardening is trending. But does it work?”

21. Exhibit D is a true and accurate copy of a promoted Washington Post article titled “The ‘feral 25-year-olds’ making Kamala Harris go viral on TikTok.”

22. Exhibit E is a true and accurate copy of a promoted Washington Post article titled “What Trump has promised to do on ‘day one’ as president.”

23. Exhibit F is a true and accurate copy of an article published by Semafor on October 30, 2024 titled “Washington Post pays to boost stories critical of Trump as subscribers flee.”

24. Exhibit G is a true and accurate screenshot taken from Meta’s Ad Library Report of a paid post by Fox News promoting an “exclusive[]” interview with “Donald Trump.”

25. Exhibit H is a true and accurate screenshot taken from Meta’s Ad Library Report of a paid post by the Daily Caller promoting a documentary called “Cleaning Up Kamala.”

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 25, 2024.

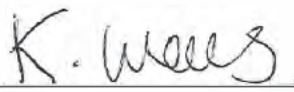

Karl Wells

EXHIBIT A

**Washington Post**

October 24 at 6:30 PM · 🌐

...

Millions of Americans have already cast a ballot in the 2024 election through mail and in-person early voting. This year, enthusiasm still appears high in several battleground states, according to the Associated Press tracker of state early-voting tallies.



WASHINGTONPOST.COM

Where millions of Americans have cast ballots during early voting

Here are the latest numbers from early voting in person and vote by mail in ...

[Learn more](#)

EXHIBIT B

 **Washington Post** 

 Sponsored · Paid for by Washington Post · 

Millions of Americans have already cast a ballot in the 2024 election through mail and in-person early voting. This year, enthusiasm still appears high in several battleground states, according to the Associated Press tracker of state early-voting tallies.





[WASHINGTONPOST.COM](https://www.washingtonpost.com)
Where millions of Americans have cast ballots during early voting

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EXHIBIT C

🕒 This article was published more than **year ago**

Democracy Dies i Darkness

‘Electroculture’ gardening is trending. But does it work?

🕒 7 min 🔗 📌 🗒 33

By ate organ

August 30, 2023 at 7:00 a.m. EDT

Most of the space on Derek Muller’s second-floor balcony in Lake Chelan, Wash., is occupied by buckets of soil planted with radishes, cucumbers and beefsteak tomatoes. In half the buckets, lengths of copper and steel wire are oiled into spirals and nestled alongside the plants. This isn’t just a garden: It’s an experiment in electroculture.

The idea, in its simplest terms, is that because the cells of plants — just like our own — have electrical signals, you can increase the plants’ growing energy by capturing atmospheric electricity and directing it into the soil.

The term has surged on social media in recent months as growers with gardens large and small give electroculture a shot. A public Facebook group called Energetic Agriculture has more than 150,000 members. The search terms “electroculture,” “electroculture gardening” and “electroculture copper wire” have been spiking on Google since early spring, and on TikTok, the hashtag has racked up more than 97 million views. Tutorials abound, with users demonstrating how to create antennas by wrapping copper wire around long wooden dowels or bamboo stakes. And there are plenty of before-and-after testimonials from gardeners who say that adding electroculture antennas made their plants flourish.

Muller is among them. “We didn’t see much difference in the radishes, to be honest, but the cucumbers and tomatoes are showing a great difference,” he says. Those with antennas are “taller plants, with bigger stalks and greener leaves.”

But for every gardener who swears by electroculture, it seems there’s another ready to debunk it. Most evidence is anecdotal, and modern scientific studies are sparse. Still, proof may be mounting: Research in Europe and Asia has shown encouraging results and electroculture advocates — and some scientists — say that harnessing electricity could revolutionize food production.

Technology with old root

Electroculture might be having a moment on social media, but the idea isn't new. In the mid-1700s, around the time of Benjamin Franklin's kite-and-key discovery, electroculture experiments were widespread among aristocratic scientists, including Jean-Antoine Nollet, the French physicist who discovered osmosis, and English physician (and grandfather to Charles) Erasmus Darwin. In 1783 another French physicist, Pierre Bertholon de Saint-Lazare, published "De L'électricité des Végétaux," which recounted many of his contemporaries' experiments in plant electrification.

Bertholon's book also promoted an invention, the "electro-vegeto-meter," which used a large system of metal pillars and wires above a garden to electrify the whole plot. Things went haywire when Jan Ingenhousz, the discoverer of photosynthesis, installed the device in his garden and the plants promptly died. Ingenhousz publicly aligned the idea, and for the next century, electroculture fell out of vogue.

In 1898, Finnish physics professor Karl Selim Lemström spoke at a meeting of the British Association for the Advancement of Science. He'd noted that trees grew more rapidly beneath the aurora borealis, an effect attributed to the northern lights' electrical field. His experiments prompted British scientists to conduct their own, and early findings were so promising that, in 1918, the British Ministry of Agriculture and Fisheries convened an official committee to investigate electroculture.

In 1936, with funding depleted, the committee disbanded. The subject was largely forgotten by the scientific community after World War II, says Yannick Van Doorne, a Belgian agricultural engineer and vocal advocate of electroculture, as synthetic pesticides and herbicides, originally invented to support military efforts, became popular. The United States, for example, dealt with a surplus of the bomb ingredient ammonium nitrate by marketing it to farmers as fertilizer.

"It was like magic. You put a powder on your field and it grows better," says Van Doorne. "It was easy and cheap. Electroculture was more mysterious; they didn't understand how it worked and it was difficult to use at a large scale." So, Van Doorne says, it was abandoned again, dismissed as pseudoscience and relegated to a folksy practice.

Re-energizing the debate

Early this spring, videos about electroculture began cropping up on social media, generating both curiosity and skepticism. Gardening influencer Kevin Espiritu falls into the latter category. He posted an Instagram video telling the 1 million followers of his channel, Epic Gardening, that antennas do not work. "Do you think if I could bury wooden dowels with copper rods in my garden ... and I'd have absolutely epic produce, that I wouldn't do it?" he says. "You'd be seeing this whole place covered in copper rods."

Espiritu is unconvinced by anecdotes about increased production, he says, because he hasn't seen any explanation for how an antenna could physically aid a plant's growth.

“Does it help it better photosynthesize? Does it help it better uptake nutrients? Does it speed up the cellular metabolism of the plant? No one seems to have that answer,” she says. “And when someone says, ‘It’s harnessing natural earth energy,’ it’s like, okay, cool. Remember when we believed the air was full of ‘ether?’”

While there’s no hard evidence to suggest copper antennas, the “bastardized, social media-lite version” of electroculture, as Espiritu puts it, have any impact in the garden, research in the greater field is surging. Some studies have shown that other electrified systems may work.

Research in Japan, for example, found that generating artificial lightning strikes near shiitake logs almost doubled the number of mushrooms they produced. And in 2018, Chinese scientists told the South China Morning Post that an experiment that involved applying pulses of positive voltage to rods created a 20 to 30 percent jump in yields. The World Economic Forum wrote that “the implications of these experiments are enormous too. ... Producing more food without putting exponential pressure on resources, or using prohibitively high levels of chemicals is likely to be one of the 21st century’s abiding themes.”

A more recent Chinese study published in the journal *Nature Food* used a device called a triboelectric nanogenerator, powered by wind and rain, to create an electric field over a crop of peas. The device was built for under \$40, and it sped up germination and increased the peas’ yield by close to 20 percent. It’s technology that could be immediately scaled, the scientists wrote, and which “may profoundly contribute to the construction of a sustainable economy.”

But nothing about electroculture is settled fact, and a 2018 systematic review of 19 studies on the subject found they all “suffered from methodological flaws, which lowered credibility in the results.”

Whether it can transform agriculture remains to be seen, but it’s unlikely that adding copper rods to your garden could harm your plants. The risks to trying it are low, though Espiritu notes the possibility, albeit improbable, that a tall enough copper pole could attract lightning strikes.

Electroculture’s supporters are determined that, this time, it won’t be swept under the rug.

Muller, a filmmaker, will release a documentary called “Electroculture Life” featuring Van Doorne and other advocates. A crowdfunding campaign for the project raised more than \$40,000. The time might finally be right, says Van Doorne, for electroculture’s moment in the sun.

“Today the media speaks about pollution, about chemicals, and everybody wants to find solutions,” he says. “Fertilizers have seen a price increase like never before, so farmers are looking for alternatives. People are beginning to garden because of food prices, and because they want autonomy. And everybody wants the best results with no work, so electroculture is very interesting.”

Kate Morgan is a freelance writer in Richland, Pa.

EXHIBIT D

Democracy Dies in Darkness

The ‘feral 25-year-olds’ making Kamala Harris go viral on TikTok

Harris’s “digital rapid response” operation and all-Gen-Z TikTok team are tapping the trends and rhythms of internet culture to create an online presence that’s unique in presidential politics.

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By [Drew Harwell](#)

September 13, 2024 at 6:05 a.m. EDT

After Tuesday night’s debate, as former president [Donald Trump](#) worked the reporters in the spin room in Philadelphia, Vice President Kamala Harris’s TikTok team was busy appealing to a different crowd.

In the digital “war room” at campaign headquarters in Wilmington, Del., they hit the button on their pièce de résistance shortly after midnight: A [six-second video](#) that mocked Trump’s performance by showing his lectern inhabited by a laughably dramatic “Dance Moms” star. “I thought I was ready to be back. I thought I was stronger than this but obviously I’m not,” she lamented. “I wanna go home.”

Viewed more than 7 million times, the video was produced by a small TikTok team — all 25 and under, some working their first jobs — given unfettered freedom to chase whatever they think will go viral. Over the past eight weeks, Harris’s social media team has helped supercharge her campaign, harnessing the rhythms and absurdities of internet culture to create one of the most inventive and irreverent get-out-the-vote strategies in modern politics.

They have trolled Trump inside his own social network, Truth Social. They have made viral memes out of bags of Doritos and camouflage hats. In 2016, a single Hillary Clinton tweet might have required [12 staffers and 10 drafts](#); today, many of Harris’s TikTok videos are conceived, created and posted in about half an hour.

“This campaign empowers young people to speak to young people,” said Parker Butler, the 24-year-old director of Harris’s digital rapid response content, a team that watches all of Trump’s speeches and can blast a clip onto social media at a moment’s notice. “And we’re here to put in the work.”

Trump also leaped forcefully into social media, seeing it as critical to grabbing voters' attention in an age of mass distraction. But while Trump has posted attacks on Harris' intelligence, warnings of economic "disaster" and grim polemics about how America's "FUTURE IS AT STAKE" — "We're a nation in decline," he says in one video, holding handcuffs aloft. "Nobody is safe. Absolutely nobody" — the Harris team has adopted a more playful approach, chasing virality with snarky, upbeat and oddball content delivered at internet speed.

Trump's team has occasionally worked to mimic Harris's online energy, but with darker memes. This week, Trump's Truth Social account posted AI-generated images showing him saving cats from a rowd of dark-skinned men — a reference to the false claims that Haitian immigrants in Ohio are eating pets, which Trump repeated on the debate stage. In other images, he held up signs reading "Don't Let Them Eat Us. Vote for Trump!" and "Kamala Hates Me."

Harris's "digital rapid response" team, as it's called, is active on every major social platform, posting family photos on Facebook, hours-long speeches on YouTube and Spanish-language calls to action on WhatsApp. On debate night, they hosted live-streamed watch parties on Twitch, walloped Trump's untruths on Threads and X, and typed Harris's most fiery lines on Instagram and TikTok. Minutes after she advised Trump rallygoers leave "his rallies early out of exhaustion and boredom," her team posted the clip with the caption, "How y s--- 🤬🤬🤬 She just broke him," following up with a photo of Harris in a kitchen, smiling.

"They really run it like a fan account," said Rachel Karten, a social media consultant who writes Link in Bio, a newsletter about online culture. "It's not like it's coming from a campaign. It's like: We talk like you. Even the caption is like: 'You have to watch this.'"

The online rollout helped Harris circumvent the tough questions and uncertainties of the traditional political press, allowing her to reach millions of voters who turn to social media as a news source. By the time Harris sat for her first big TV interview as the Democratic nominee, she had already appeared in dozens of social media videos, giving direct-to-camera monologues about *Roe v. Wade*, chatting on the phone with the Obamas and talking with her running mate Tim Walz about "White guy tacos" and the guitar skills of Prince.

The approach seems to be paying off. The Harris campaign has gotten 100 million more views than Trump on TikTok, despite having half as many followers, according to an analysis of data from Zelf, an online measurement firm.

It's also gotten under Trump's skin. He posted a Truth Social video this month saying his campaign is "the greatest social media program in history" and that any claims of Harris's online success were "disinformation": "She's not even a small fraction of what we do. But that's the way they do it, they lie." He has also, without evidence, accused her team of paying for fake followers. The Harris campaign responded, "Rent free" — as in, how they're living, inside is dead.

Campaign officials say the digital operation has seen success beyond social media. To some supporters, it's a big reason the 59-year-old politician is generating interest among young voters.

“That’s kind of like what charisma is today: Can you and well on the internet?” Colton Wickland, 27, said at a rally in Milwaukee last month.

‘Create the news’

Though only a small fraction of her campaign’s 250-person digital operation, Harris’s social media team is by far its most visible part, running all her accounts and watching for trend-worthy moments they can spotlight in real time.

Deputy campaign manager Rob Flaherty, who has described them as a pack of “feral 25-year-olds,” said the campaign started developing the strategy last year, worried voters had forgotten who Trump was and that the campaign needed “a voice that was more aggressive and hard-hitting” to remind them.

The team faces minimal content-approval checks and “barring objection, we’re gonna go. Everything goes on a five-minute warning,” Flaherty said. “You just gotta trust your people. Our f---up ratio [is as low] as if there were 19 layers of approval.”

A 13-person rapid-response team keeps a shared calendar of all major political events for both Republicans and Democrats and monitors them in shifts to ensure “we are never not watching,” said Butler, the team’s manager. When an eye-catching moment happens — like when Trump said immigrants had “poisoned” the country — the team races to post a clip of it on social media, working shifts that sometimes go past midnight.

“Campaigns are not just responding anymore,” Butler said. “Our job is to create the news.”

Each of the team’s social media “strategists” specializes in an individual platform, catering to its audience, subculture and slang. One strategist, for instance, is solely responsible for Facebook, where Butler said content for baby boomers thrives.

Lauren Kapp, 25, heads the five-person TikTok team. Every day, she wakes around 6:30 a.m. and starts scrolling the video app so she can be ready for their daily 9 a.m. meeting, when the team breaks down what’s trending that day.

A few years ago, Butler and Kapp were both fresh graduates of what Kapp called “the Covid class.” Butler, a high school debate champ in Texas during Trump’s presidency, graduated from American University in 2020 and landed work as a video editor for Biden’s campaign. Kapp, who struggled to find a job as a political correspondent after leaving University of California, Berkeley, was hired by the Democratic National Committee as a “vertical video producer” after building a midsize TikTok following under the username “Poli Sci Princess.”

Earlier this year, both shifted from the Democrats’ online operation to the Biden-Harris team, where their job is not to mimic the cinematic editing and high production values of traditional campaign ads but instead to behave like typical TikTok users: reposting other people’s videos, sharing memes and sound bites, and reacting to major news moments, such as the particularly spicy dig Walz took at Vance during a speech in Philadelphia (“omg Tim Walz WENT THERE”).

They've "stitched" Trump into ips that tee im up as a punchline and split-screen is comments on abortion alongside the mobile game "Subway Surfers" — a common TikTok tactic for keeping overstimulated viewers' attention. One post ranked photos of Walz by "aura points," TikTok slang for a measure of coolness. (Enjoying a state-fair ride with is daughter, Hope, was "+23958 aura.")

The team records and edits the videos on their phones before sending them over Slack to Butler, who typically reviews and signs off in less than 15 minutes. It an look freewheeling, but the team treats its content strate like a science. Kapp said she won't use any TikTok "trending sound" — t e short audio clips that users can apply to their own videos — if it's been used in more than 200,000 videos. "People get bored very easily," she said.

After the Democratic convention, Kapp ad just gotten home from Chicago and was trying to think of ways to emphasize Trump's inks to the conservative policy doctrine Project 2025 when she opted for a wild juxtaposition: a niche TikTok meme of dolphins and rainbows. The single-image post is now one of their most popular pieces of content, with more than 7 million views. Trump's ampaign opie it a few ays ater.

"You wouldn't anticipate a political campaign to o it, which is what ontributed to the virality of it," she said.

TikTok is one of the world's most popular social apps, with 170 million U.S. accounts, and roughly 40 percent of its American users said t ey use it to keep up with politics or current events, a Pew Research Center survey found ast month; Trump's campaign employs a TikTok team of its own.

For Harris, there's an awkward urdle, however: The Biden administration is urrently defending in ourt a potential nationwide ban of TikTok, arguing the Chinese-owned app is a national security threat. Harris's team uses TikTok on phones with nothing else installed to abide by a federal prohibition of the app on government-owned evices.

The campaign's online engagement has skyrocketed during the Harris era. On TikTok, their "like-to-view" ratio, a measure of viewer engagement, went from about 10 percent during the Biden months to 25 percent, Kapp said.

An though ampaigns dating back to former president Barack Obama have taken social media seriously, the Harris team's big innovation has been letting a new wave of Generation Z innovators take control, said April Eichmeier, an assistant professor who studies political communication at the University of St. Thomas in Minnesota.

"The under-25 group right now has never known a world without igital media," she said. "They know how things and on TikTok because that's their ulture."

The team's seemingly frenetic and amateurish output conceals a sophisticated strate , said Lara Cohen, a former executive at X who ed some of its top partnerships with media operations and influencers. Each viral video elps them sneak into nonpolitical spaces and reach voters who are un ecided or otherwise tuned-out.

"Great ideas die with too long an approval process," said Cohen, now an executive at the reator-service ompany Linktree. "Someone's going to be too worried to do something ed . And they're clearly not afraid of that."

‘Oh he’s mad lol’

As the campaign’s social media experimentation has exploded, the lines between its online and offline presence have blurred. TikTok-style monologues have appeared in TV ads. Candidate selfies in field offices have appeared, from multiple angles, on Instagram. The campaign’s \$40 camouflage “Harris Walz” t-shirt has shown up not just in TikTok videos but on the head of Harris’s stepdaughter Ella Emhoff.

Harris and Walz, too, have tried their best to be omnipresent. During the convention, Harris played a name-that-song quiz with a social media show and told another creator that her favorite Chicago food was an Italian beef sandwich. Walz recently appeared on the short-video show “Subway Takes,” in which comedians offer their most controversial or raunchy opinions; Walz extolled the value of home-gutter management.

The goal, campaign staffers said, has been to humanize the candidates in a bitterly contentious race. After a Harris fundraising email said she’d opened with Trump’s 2016 election victory by scarfing down “a family-sized bag of nacho Doritos,” leading one Fox News guest to complain it was not “the response of an elite leader,” Walz’s X account posted a video showing him grabbing her a bag between campaign stops. “Even an attack on her only seems to make her more relatable,” one viral Threads post said.

Rather than characterize Trump as a generational threat, Harris’s operation has often worked to cast him as an “unhinged and unserious an” and the butt of a big joke. Last month, when Trump suggested he might back out of this week’s debate, the team layered his video clips with the sound of a chicken. Although previous campaigns were reluctant to amplify Trump’s attacks, the Harris campaign has repeated them verbatim to mock or defang them alongside quips like “Oh he’s mad lol.”

Harris’s team has gone on the offensive inside Trump’s Truth Social, using their 350,000-follower account to needle Trump about his crowd size. Beyond just laughs, one campaign aide said a goal of the account is to rattle and enrage Trump inside his online safe space. After the debate, Harris’s team posted Fox News clips calling Trump’s performance a “train wreck.”

Trump’s campaign has eroded Harris’s strategy as juvenile, with a spokesman saying anyone who thinks “using emojis is some cutting-edge message technique ... [is] severely out of touch with reality.”

On TikTok, however, Harris’s team has proved so popular that people claiming to secretly run the account has become a meme in itself. To show it’s in on the joke, the campaign posted a video featuring Harris’s husband, Doug Emhoff, who — when asked who runs the account — only replies: “It’s obviously me.”

The real test will come in November, when the election shows whether sway on social media can produce real-world power. With less than two months until Election Day, Harris’s TikTok has shown a pivot toward more substantive fare, including a multipart series laying out Trump affiliates’ links to Project 2025.

They’ve also worked to capitalize on a new sense of hope among Democrats. One video, built on a trending clip of poignant music typically used for scenic vistas and sunsets, features a voice-over — “Oh, I wasn’t sad, I just needed a ...” — then cuts to a buoyant DNC crowd cheering near an American flag.

“They’ve basically created this digital [fandom] of her,” Cohen said. “It sounds corny, but the most successful people online are the ones who feel unfiltered and authentic and real. That’s what people rally around.”

Dylan Wells contributed to this report.

CORRECTION

A previous version of this article incorrectly identified the event where Tim Walz made a “particularly spicy” reference to Donald Trump. It was during a speech in Philadelphia, not at the Democratic National Convention in Chicago. The article has been corrected.

EXHIBIT E

What Trump has promised to do on ‘day one’ as president

Trump has made 41 distinct promises for his first day in office, including mass deportations and banning transgender women from sports.

 8 min


733

By [Derek Hawkins](#), [Clara Ence Morse](#) and [Eric Lau](#)

Updated November 7, 2024 at 8:54 a.m. EST Published September 1, 2024 at 6:00 a.m. EDT

[Donald Trump](#) has a long list of executive actions he says he wants to carry out on his potential first day back in the White House. Among them: Begin mass deportations, eliminate perks for electric vehicles and ban transgender women from women’s sports.

Trump has made 41 distinct promises about what he says he wants to do “on day one” as president, and he has mentioned those promises more than 200 times on the campaign trail, according to a Washington Post analysis of his speeches from his campaign launch in Nov. 2022 to Sept. 2024.



Podcast guide

Trump's Day 1 to-do list

Today, what Donald Trump's second term as president could look like.

[Play now](#) 1 min

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While [presidential candidates](#) often trumpet their plans for their first day in the White House, Trump has leaned especially hard on this rhetorical device when he’s behind the teleprompters. His proposals often envision stretching the powers of the Oval Office beyond how previous presidents — including Trump himself — have invoked them.

Many of Trump’s promises fall outside the scope of a president’s authority under the Constitution, according to legal experts. Even some of those that are within his purview would face legal or logistical challenges that would make them all but impossible to carry out on a short timeline.

But Trump has tried to bulldoze past such constraints before, and he may try again in a potential second term. Pressed late last year to promise not to abuse power if he were to return to the White House, Trump said that he would not be a dictator “except for Day One,” vowing to close the southern border and expand oil drilling.

“A lot but not all of what Trump says he wants to do on day one is going to be illegal or impractical,” said Steve Vladeck, a constitutional law expert at Georgetown University Law Center and a critic of how Trump has wielded executive power. “But even the illegal stuff might go into effect for some time, and he might actually succeed in pushing the law in his direction.”

Trump made sweeping promises in his 2016 campaign, too. On his first day in the White House, he signed a largely symbolic order kicking off his attempts to dismantle the Affordable Care Act and ordered a freeze on all pending government regulations until his administration could review them. He also nixed a plan to reduce fees on certain federal mortgages. Soon after, he rolled out more-aggressive policies, such as his restrictions on travel from countries with substantial Muslim populations.

Karoline Leavitt, a spokeswoman for the Trump campaign, said in a statement that Trump “delivered on his first term promises to build the wall, rebuild the economy, and make America respected again on the world stage — and he will deliver on his promises in a second term as well.”

Trump entered his 2016 campaign on anti-immigrant rhetoric, and he is doing so again this year. He has made more unique day-one promises related to this topic than any other, according to The Post’s analysis.

The two promises he brings up most often — “begin the largest deportation operation in American history” and “eliminate every open borders policy of the Biden administration” — signal a harsh crackdown on immigration but offer few details on what specific actions he’d take in the White House.

Presidents have broad power to shape immigration policies under the Constitution and federal immigration law, so the fact Trump is making broad promises on this issue isn’t surprising, especially given its importance to voters.

But presidents must adhere to constitutional protections such as due process when enacting immigration policies. His promise to conduct mass deportations would face legal challenges on this front, as well as logistical hurdles that would make an immediate large-scale deportation infeasible. Advocates have also condemned the plan as inhumane.

Another day-one promise Trump has made on immigration is to end birthright citizenship, a bedrock principle of American civil rights enshrined in the 14th Amendment. Experts broadly agree that such a move would require a constitutional amendment proposed by Congress and ratified by three-fourths of the states.

And even if Trump attempted to eliminate birthright citizenship for certain groups through executive actions — by directing states not to issue birth certificates, for example — it would probably be immediately halted in court, said Omar Jadwat, director of the ACLU Immigrants’ Rights Project.

“There are a bunch of ways you could try it,” Jadwat said, “but it’s impossible to imagine any court allowing something so blatantly unconstitutional to happen.”

Trump has more leeway when it comes to rolling back executive actions on immigration, such as Biden's protections for the undocumented immigrant spouses of U S citizens. Even there, however, his decisions would have to comply with federal administrative law, which sets forth requirements for changing government regulations

Trump has stumbled here before. He tried twice as president to dismantle the Obama administration's program protecting undocumented immigrants brought to the United States as children but was blocked by the Supreme Court.

In 2023, as a national debate over the teaching of race and gender heated up, Trump began making two distinct day-one promises about education in his rally speeches

On at least 45 occasions he has threatened to cut federal funding for schools that allow discussions about race, gender or sexual orientation that he objects to. Similarly, he has said 37 times that he'll cut funding for schools that have vaccine or mask mandates. Trump staked out his opposition to these public health requirements during the coronavirus pandemic and has clung to this line even as school districts have eased or entirely erased pandemic rules.

Neither promise is actionable for Trump, however; he would need congressional approval to cut funding because there are no such conditions on federal education funding in current law.

Trump has promised 31 times to repeal what he describes as Biden's "electric vehicle mandate " Biden hasn't issued any specific "mandate" on electric vehicles, but the phrase has become a buzzword among Republicans, generally referring to the Biden administration's fuel emissions standards and a set of incentives — some of them approved by Congress — to promote electric-vehicle production.

Trump has also said nine times that he will "repeal the Green New Deal." The term "Green New Deal" originated in a 2019 climate change resolution proposed by liberal congressional Democrats. Republicans have since used it to refer to the environmental components of the Inflation Reduction Act and other environmental policies they disagree with.

None of these policies can be repealed unilaterally on day one by Trump because they either involve legislation passed by Congress or agency rulemaking that would be subject to litigation if Trump tried to revoke them.

In addition to his threats to cut school funding over discussions of gender identity, Trump has vowed on day one to enact policies that would affect the personal lives of transgender Americans.

His most frequent promise on this front is to ban transgender women from participating in women's sports — a remark he has made 18 times He has also proposed a national ban on gender-affirming surgeries for minors, which he calls "child sexual mutilation." Trump could attempt to chip away at these goals through executive actions, but, as with other promises, these aren't policies a president can enact unilaterally, and he would probably be immediately challenged in court.

Other day-one proposals from Trump are more of a grab bag, spanning a range of topics and receiving mostly passing mention in his speeches.

He has vowed to repeal three of Biden's executive orders on his first day — one related to the growth of AI, one expanding background checks for gun purchases, and one promoting diversity, equity and inclusion in the federal workforce. Here, he could make some immediate change. Presidents aren't bound by their predecessors' executive orders, so it's likely that he could start unraveling these quickly.

"That's just about the easiest thing a president can do on his first day," said Vladeck, of Georgetown Law. "The lowest-hanging fruit is revoking executive orders."

Trump has also floated more than a dozen other day-one promises including veterans' issues and Justice Department prosecutions. He has made at least seven day-one remarks related to easing various fishing commercial regulations, and three references to eliminating taxes on tips, a proposal both he and Vice President Kamala Harris brought up on the campaign trail.

Methodology

The Post compiled a database of Trump's speeches from his campaign launch on Nov. 15, 2022, through Sept. 10, 2024, from his Rumble live stream history. The Post extracted every reference he made to "day one" or "first day" and determined which topics were mentioned, and which distinct promises, if any, were made. For curating distinct promises only references to Trump's potential first day in office in 2025 were included.

EXHIBIT F

Events

Newsletters

SIGN IN

8:34 PM THURSDAY NOVEMBER 21, 2024



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INTELLIGENT TRANSPARENT GLOBAL

Washington Post pays to boost stories critical of Trump as subscribers flee

Max Tani and Josh Billinson

Updated Oct 30, 2024, 5:06pm EDT MEDIA

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① THE SCOOP

The Washington Post is paying to remind readers that it is still pretty tough on Donald Trump.

Like many news organizations, the Post pays a small amount each month to show articles in feeds on Facebook and other social media platforms. But on Monday, the paper aggressively ramped up its paid advertising campaign, boosting dozens of articles related to the election.

While the articles about Vice President Kamala Harris were relatively neutral in tone and focused on her innovative [digital strategy](#), her policy [proposals](#), and her chances of winning next week, the articles that the Post paid to highlight about Trump told a different story.

The paper boosted multiple critical articles, including about Trump's [campaign rhetoric](#), [his misstatements](#), his allies' attempts to "[energize him as he struggles to adapt to Harris](#)," how his campaign [damaged Springfield, Ohio](#), his fixation on the fictional serial killer Hannibal Lecter, [how crowds leave his rallies early](#), and his questioning of the results of the election, among other stories

AD

I this article:

⦿ Max's View

≡ Room For Disagreement

⦿ MA 'S IEW

It's difficult not to see the Post's move as anything other than a reaction to the massive subscriber departure following its non-endorsement decision last week.

On Friday, The Washington Post announced that it would no longer be endorsing presidential candidates, a decision that billionaire Jeff Bezos said would ultimately restore reader faith in the paper. It was a remarkable reversal for a publication that boosted its readership through critical reporting and editorials about Trump's presidency, even rebranding itself as a crucial part of the continuation of American democracy. The decision not to endorse immediately sparked a wave of outrage among the paper's liberal readers, reportedly prompting more than , subscribers — % of the paper's subscriber base — to cancel their subscription.

Prior to Monday, the paper had run just around a dozen ads all month on Facebook, which largely featured simple Post branding without any mention of Trump. Monday's paid Facebook push was a clear acknowledgment that the paper hopes to win back some of the anti-Trump subscribers that may have canceled. It's also a demonstration of just how much the Post is reliant on liberal readers opposed to Trump for revenue. Instead of using the opportunity to boost its tech or culture coverage, the paper leaned more into what it knows converts readers into subscribers: Its critical reporting and op-eds about the former president.

AD

REPORT: FACEBOOK AD AGREEMENT

Meta prohibits new ads the week of the election, so the Post was likely getting some new ads up before the company freezes new ad buys. A Post employee noted that the paper promotes highly-trafficked stories that have already performed well, and only a minority of the pieces promoted on Monday specifically mentioned Trump in critical light.


AD

Top Stories

Why Trump may get off to a slow start

Trump taps Bondi's attorney general after Gaetz bows out




EXHIBIT G

 Inactive

Library ID: 2280044708945409

Mar 27, 2019 - Mar 27, 2019

Platforms

Categories  Impressions: >1M **FoxNews**

Sponsored • Paid for by Fox News

Library ID: 2280044708945409

Programming Alert: President Donald Trump sits down exclusively with Sean Hannity in his first interview since the Mueller report. Tune in tonight at 9pm/EST.

EXCLUSIVE

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TONIGHT

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MUELLER REPORT**





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EXHIBIT H



 Inactive



Library ID: 399902572879569

Sep 17, 2024 - Nov 6, 2024

Platforms  

Categories 

 Estimated audience size: 1M 

 Amount spent (LBU): \$10K - \$15K 

 Impressions: 700K - 800K 



The Daily Caller

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Library ID: 399902572879569

Who exactly is Kamala Harris, and what does she really believe? Watch the Daily Caller's new documentary **CLEANING UP KAMALA** to discover how the media took Kamala's reputation as the worst VP in U.S. history to a warm, joyful "Mommie." Subscribe here to watch —

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