Who Will Check the Checkers? False Factcheckers and Memetic Misinformation

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Fact-checkers will take on an outsized role in combating social media misinformation campaigns in the lead up to the 2020 elections in the United States (and others worldwide).¹ It is obvious that the U.S. presidential campaign will attract both foreign and domestic actors peddling misinformation.² Moreover, there has been a dearth of preparation for such an onslaught.³ If fact-checking is a central


² In this Essay, I use “misinformation” to mean statements that are untrue, while “disinformation” is a subdivision of misinformation wherein the speaker appreciates the untruth of the statement. Brian G. Southwell, Emily A. Thorson & Laura Sheble, *The Persistence and Peril of Misinformation*, AM. SCIENTIST (Nov.-Dec. 2017), https://dukespace.lib.duke.edu/dspace/bitstream/handle/10161/17872/Southwell%20et%20al%20in%20American%20Scientist%202017%29.pdf?sequence=2&isAllowed=y [https://perma.cc/7F88-UEV4]. In the case of social media, the two typically merge: disinformation is spread by the intentional propagandist and is further spread by the misinformed user. For reader ease, this Essay typically refers to disinformation as propaganda.


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means of defending voters from misinformation, we should anticipate efforts to undermine that defense. Accordingly, it is vital to assess the effectiveness of fact-checkers in the context of the 2018 election (that is, after the initial Russian disinformat ion campaign of 2016)\(^4\) and to evaluate continuing challenges to the fact-checking mission. Sadly, the prospects of robust fact-checking appear grim: there are troubling false equivalency developments within the wider fact-checking community and, more importantly, there is a concerted attack on fact-checking credibility through the creation of imposter fact-checking sites.

This Essay sets out the need for disciplined fact-checking networks and the likely counterattacks of domestic and foreign propagandists. Part I sets out the continuing social media disinformation campaigns infecting elections worldwide, which stoke internal divisions and undermine public discourse. Part II details fact-checking efforts and their effectiveness, with specific attention paid to the neutralization of memes designed to inflame racial hatred. Part III examines disturbing trends that threaten the fact-checking mission, including an internally-driven tendency towards false equivalence and foreign-directed efforts to create imposter fact-checkers. Part IV offers an overview of potential solutions and areas for future study.

I. THE ONGOING PROBLEM OF MISINFORMATION ON SOCIAL MEDIA

The widespread reach of social networks, such as Facebook and Twitter, makes misinformation peddling easy and effective.\(^5\) There are a variety of methods to help false news propagate and recruit credulous users. Moreover, social networks may take a variety of approaches in response to address the problem. This Part provides

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\(^5\) See infra Section III.A & B.

\(^6\) See generally Moshirnia, supra note 4 (discussing role of different social networks in disinformation campaigns worldwide and relative threats of centralized and decentralized networks).
a brief overview of memetic (that is, meme-based)\textsuperscript{7} misinformation types and social media responses.

\textit{A. Suggested Dichotomy of Memetic Misinformation}

Propaganda and social media misinformation can be categorized by the means of information delivery. While false quotes and text-based claims are easy to manufacture, propagandists can increase viral spread by incorporating visuals\textsuperscript{8} to construct easily spread memes. This can take the form of altered graphics (e.g., a constructed image or manipulated video recording) or unaltered images that are falsely described. A rapid dichotomy of meme types focuses on the relationship of framing text to media content. While any misinformation is regrettable, it is generally assumed that misinformation paired with visual “evidence” is more compelling and thus more effective in its misdirection.\textsuperscript{9} These approaches may be described as:

- **False Text** – E.g., a meme claiming that President Obama “paid off” Iran with $150 billion or a meme claiming Congresswoman Ocasio-Cortez is in constant debt\textsuperscript{10}
- **False Text Paired with Unaltered media** – E.g., pairing an unaltered photo of an injured officer with a false statement that the injury was caused by migrants or pairing an unaltered video of Congresswoman Omar dancing with a false statement that the dance occurred on the anniversary of 9/11\textsuperscript{11}
- **False Text Paired with Altered media** – E.g., photoshopping a photo to depict a Stoneman Douglas shooting survivor tearing up the Constitution\textsuperscript{12} or altering a video of Speaker Pelosi to make her appear drunk\textsuperscript{13}
- **False Text Paired with Fabricated media** – E.g., Deepfakes or constructing false tweets celebrating the Notre Dame fire\textsuperscript{14}

\textsuperscript{7} “Here, meme is used in the sense of a uniform message format, often paired with a photo, for repetition with minimal variation.” Moshirnia, \textit{supra} note 4, at 82 n.9.

\textsuperscript{8} The use of visuals to increase the potency and virality of information is well understood. \textit{See, e.g.}, Moshirnia, \textit{supra} note 4, at 101–10 (providing legal and scientific recognition of the power of visuals in propaganda).

\textsuperscript{9} Id.

\textsuperscript{10} \textit{See infra} Section II.B.1. at notes 73–79.


\textsuperscript{13} \textit{See infra} Section II.B.

\textsuperscript{14} \textit{See infra} Section II.B.2.
The breadth of delivery types signals that a single technological solution is unlikely to resolve this problem. Instead, fact-checking and behavioral modification are necessary countermeasures in a climate of informational warfare.

B. Social Firm and Political Response to Misinformation

Perhaps the best known recent example of a manipulated video was the “drunk” recording of Speaker Nancy Pelosi widely disseminated by right-wing posters.15 Right-wing commentators and politicians began spreading a video of Speaker Pelosi in which her speech seemed slurred and halting. This was accompanied by captions noting that the Speaker was either drunk or mentally frail.16 The video itself is fairly easily explained, as the playback speed is slowed and Speaker Pelosi’s voice is adjusted. However, the video accumulated more than three million views on Facebook, YouTube, and Twitter.17

The treatment of the “Drunk Pelosi” post highlights both the speed of viral spread and social networks’ disparate approaches to preventing misinformation. Though the video was outed as fake, social media companies had very different approaches to curation. YouTube was the only one to take steps to fully remove the

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video. Facebook took approximately a day to take limited downgrade actions. While Facebook acknowledged that the video was false, they refused to take the video down on the grounds that they “don’t have a policy that stipulates that the information you post on Facebook must be true.” Twitter also left the video up, with tweets slandering the Speaker as “drunk as a skunk.” The President later tweeted approval of a second misleading video, this one featured on Fox News, which was edited to give Speaker Pelosi a repetitive stammer.

Regardless of the form misinformation takes, politicians and other key power brokers have trafficked in false narratives. Domestically, falsely captioned photos and videos played a key role in propaganda campaigns concerning the migrant caravan in the lead up to the 2018 midterm election. These memes were further spread by political actors such as congresspersons, the wife of a Supreme Court justice, and the President himself. There is every indication that this behavior will continue in the lead up to 2020.

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20 Harwell, supra note 18.


23 See generally Moshirnia, supra note 4, at 113–24 (collecting memes falsely depicting 2018 migrant caravan as violent).

24 Id. at 124.

25 Id. at 117.

26 This should not be interpreted to mean that only right-leaning users are vulnerable to misinformation. See Moshirnia, supra note 4, at 90.

Internationally, the situation is much the same. The Indian elections saw false news spread at “stupefying speed” as both the dominant Bharatiya Janata Party (BJP) and Indian National Congress (INC) repeatedly pushed junk narratives. A full third of images shared by the BJP and a fourth of images shared by the INC were “divisive and conspiratorial.” Oxford’s Project on Computational Propaganda noted that “the proportion of polarizing political news and information in circulation over social media in India is worse than all of the other country case studies we have analyzed, . . . except the U.S. Presidential election in 2016.”

Elections in the EU and Brazil have similarly been the staging ground for social media-based propaganda campaigns. The takeaway is fairly obvious: domestically produced propaganda is being spread through social media by interested parties, and political actors are furthering this effort. Moreover, politicians seem to pay little price for this mendacity.

Researchers and commentators have recognized that this constitutes a paradigm shift in the informational sphere. New information delivery systems may contrast or conflict with previous informational norms and paradigms against background levels of public trust. These gaps can be exploited or otherwise lead to credibility issues: one need only think of the Welles 1938 Radio Drama, the Cottingley Fairies, and Spirit Photography, or even the disruptive nature of the printing press. For
more recent examples, the early internet and found-footage genres come to mind.35 Past informational disruptions occasioned calls for greater regulation of broadcasters and more skepticism from media consumers.36 However, the lag in consumer attitude adjustment to novel media behavior is of great concern. Individuals with relatively little experience in digital ecosystems may be especially vulnerable and slow to react.37 Electoral malfeasance is possible in such an environment.

II. FACT-CHECKING AND THE FIGHT AGAINST MISINFORMATION

While there are calls for greater social media intervention to prevent the posting of misinformation in the first instance,38 the likelihood of such efforts actually yielding fruit remains slim. The relative paucity of other intervention avenues therefore highlights the importance of fact-checking groups. This section discusses photographs of ghosts attracted similar credulous attention. River Donaghey, Look at These Creepy ‘Spirit Photos’ from the Early 1900s, VICE (June 25, 2010, 10:00 PM), https://www.vice.com/en_us/article/avvey8/look-at-these-creepy-ghost-photos-from-the-early-1900s-456 [https://perma.cc/68S6-DGM5].


36 Id. For example the newspaper coverage of the supposed Welles 1938 panic motivated F.C.C. chairman Frank McNinch to “quickly obtain[] informal agreement from the radio networks that fictional news ‘flashes’ would not be used again.” Pooley & Socolow, supra note 34.

37 Numerous studies have found that older Americans were more likely to share misinformation. Moshirnia, supra note 4, at 89. Fake News Sharing Is Rare but Older People over 65 Are More Likely to Share These Articles, Study Finds, SAGE OCEAN (Feb. 26, 2019), https://ocean.sagepub.com/blog/2019/2/26/fake-news-older-people-facebook-twitter-share-2016-presidential-election [https://perma.cc/7XYF-XJ7U]; Troll Watch: Study Shows Older Americans Share the Most Fake News, NPR (Jan. 13, 2019, 5:21 PM), https://www.npr.org/2019/01/13/684994772/troll-watch-study-shows-older-americans-share-the-most-fake-news [https://perma.cc/A6VK-R97Q].

the salient features of effective fact-checking and then presents specific successful and unsuccessful fact-checks to memetic misinformation.

A. Effective Fact-Checking

The effectiveness of fact-checking is dependent on several variables, with rapidity, credibility, and readability playing paramount roles. It is important to understand the gravity of these factors and the likely steps taken by propagandists to thwart rebuttal.

Optimally, fact-checking can halt the spread of viral misinformation by motivating platform operators to remove false content or, at a minimum, to flag untrue content as false. This requires both a rapidity of detection and a willingness of platform operators to curate content. Propagandists employ various methods to delay detection, including the use of photos of text rather than searchable text, slight variation in meme text, alteration of meme photos, and impersonating credible media outlets.

Even if fact-checkers quickly conclude that a meme is false, this does not ensure action by the social network provider. As documented previously, social media operators may be reluctant to remove propagandist content and only slightly more willing to label such content as false. YouTube appears to demonstrate some willingness to remove false content. Facebook has experimented with various methods of limiting the spread of false content for several years but has also adopted a lax policy with regard to political advertisements. Facebook-owned Instagram only just recently launched a similar program. Twitter, by contrast, does far less in


40 Moshirnia, supra note 4, at 90.


response to misinformation, but it bans political ads.\textsuperscript{44} Twitter feeds are replete with pleas from fact-checkers that appear to generate little to no corporate response.\textsuperscript{45}

Fact-checks may also require a greater amount of research and explanation of an issue to combat a false Manichean narrative.\textsuperscript{46} This impacts both the speed of fact-checking and its potential reach. If a fact-check is too nuanced or detailed, it may be unintelligible to its intended audience.\textsuperscript{47} For example, blanket statements of financial impropriety often require in-depth explanations that may be too complex for effective soundbites.\textsuperscript{48} Moreover, specious statistical analyses conflating correlation with causation are difficult to combat without attempting to teach mathematical or logic concepts.\textsuperscript{49}

It is important that a fact-check provide extra detail. Meta-analysis of various studies of misinformation points to a resistance on the part of message recipients to corrective efforts that merely label the initial information as wrong.\textsuperscript{50} Instead, the corrective effort must debunk the initial message with additional information on the subject (though researchers differ on the impact of format and tone in this

\begin{itemize}
\item \textsuperscript{44} Moshirnia, supra note 4, at 92; Natasha Lomas, \textit{Twitter’s Political Ads Ban Is A Distraction from the Real Problem with Platforms}, TECHCRUNCH (Nov. 2, 2019, 10:00 AM), https://techcrunch.com/2019/11/02/twitter-political-ads-ban-is-a-distraction-from-the-real-problem-with-platforms/ [https://perma.cc/P8T5-AYQ7].
\item \textsuperscript{46} Moshirnia, supra note 4, at 112–13 (noting that memetic disinformation campaigns adhere to common propaganda of good vs. evil narratives).
\item \textsuperscript{47} Dannagal G. Young et al., \textit{Fact-Checking Effectiveness as a Function of Format and Tone: Evaluating FactCheck.org and FlackCheck.org}, 95(1) JOURNALISM & MASS COMM. Q. 49 (2017).
\item \textsuperscript{48} For example, explanations of President Obama’s “gift” of $150 billion dollars to Iran, which was neither a gift nor $150 billion dollars, \textit{see infra} Section II.B.1. at notes 73–79, require the audience to understand the nature of frozen assets and the international monetary system.
\item \textsuperscript{50} Ulrich K.H. Ecker et al., \textit{The Effectiveness of Short Format Refutational Fact-Checks}, 111 BRITISH J. PSYCHOL. (2019).
\end{itemize}
response.\textsuperscript{51} However, this richness of the debunking report may not always have the intended effect – a thorough framing of the initial meme may encourage meme persistence. That is, in providing a hyper-detailed debunking, the fact-checker may inadvertently help spread the initial meme.\textsuperscript{52}

Of course, a fact-check must also be believed by the user in order to combat misinformation. Studies disagree on the amount of motivated reasoning that a user will engage in when confronted with a fact-check, but the possibility exists that political affiliation\textsuperscript{53} or extreme partisanship leads to an inflexibility of belief.\textsuperscript{54} Fact-checking missions may be plagued by accusations of bias, undermining their credibility.

In light of these factors, we should expect propagandists to attempt to: slow the availability of fact-checks (by either escaping detection or by challenging extant fact-checks), undermine the credibility of oppositional fact-checks, boost credibility through supportive fact-checks, and generally complicate the information gathering process by diluting the meaning of “fact-check.” As discussed below, propagandists may accomplish all of these goals through imitation fact-checkers that peddle misinformation and further confuse users.

\textbf{B. Relatively Successful and Unsuccessful Fact-Checking}

The difficulties outlined above should not be interpreted to mean that the fact-checking mission is completely futile. Studies have shown that corrections to misinformation can “reduce but not eliminate the influence of misinformation on


\textsuperscript{52} See Ecker et al., supra note 51; but cf. Chan et al., supra note 51, at 1532 (explaining that “corrections that merely encourage people to consider the opposite of initial information” often strengthen the misinformation and claiming that effective debunking requires a sufficiently detailed message).


reasoning. For example, if subjects are initially told that robbery suspects were members of an ethnic group, then told a correction that the initial report was false, subjects may cease to mention the slandered ethnic group but still rely on details tying the robbery to that ethnic group (e.g., appearance and language spoken by the suspects). Fact-checking in the political realm is of special concern because, in theory, a speaker’s popularity should suffer in the face of repeated corrections demonstrating past lies. However, this appears to be a cultural norm: American attitudes towards politicians seem far less sensitive to repeated demonstrations of lying than Australian attitudes.

The effectiveness of fact-checking of specific misinformation strands varies. As noted earlier, scholars have previously documented the wide spread of memetic propaganda in the lead up to the 2018 midterm elections. In the section below, a review of propaganda circulated after the midterm election reveals wide variability in current fact-check remediation efforts and provides further urgency to combat the misinformation threat.

1. Propaganda Stoking Hatred of Undocumented Immigrants

A common theme of propaganda is stoking nativist fears against the deleterious “other.” Previous studies of memetic propaganda have focused on the right-wing messages demonizing migrant caravans. These images were not quickly removed from most platforms and were further spread by right-wing politicians and media figures. These memes typically involved a genuine photo with a false caption. This approach is typified by a meme showing a bloodied police officer with the implication that the officer was harmed by the migrant caravan, as in the figure below.

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56 Id. (discussing results involving a false news report concerning Aboriginal Australian suspects).
57 Id. at 11.
58 See generally Moshirnia, supra note 4.
59 Infra Section II.B.1–2.
60 See generally Moshirnia, supra note 4.
61 Id. at 113–21.
62 Id. at 113–43.
Wider memes regarding undocumented immigration and the need for a border wall appear to have been combated more effectively. In late December 2018, a meme was created to spread President Trump’s earlier June 2018 false statement that 63,000 Americans have been killed by illegal immigrants in the years following the 9/11 World Trade Center attacks. The meme was successfully combated by fact-checker PolitiFact, with a mere 188 engagements of the false meme with 16,400 engagements on Facebook with the correction.


This may be due to the relative simplicity in debunking an unsupported statistic.

Kevin Breuninger, Trump Says More than 63,000 Americans Were Killed by Illegal Immigrants Since 9.11. But the Math Doesn’t Add Up, CNBC (June 26, 2018, 5:14 PM), https://www.cnbc.com/2018/06/25/trump-says-63000-killed-by-illegal-aliens-the-math-doesnt-add-up.html [https://perma.cc/4W4Q-UN7W]. An engagement is a user interaction with a post, such as a like, share, or comment.

A text post falsely claiming that 18 million illegal immigrants received a government check during the shutdown was also successfully combated, with only 4,400 engagements with the false meme, compared to 17,400 engagements on Facebook to its fact check.\textsuperscript{69} A false text post on previously allocated border fencing money was also quickly combated.\textsuperscript{70}


However, there are numerous examples of unsuccessful attempts to debunk false narratives. A particularly pernicious lie involves the Obama administration’s relationship with Iran. In December 2018, a text post falsely claimed that the Obama administration gave Iran $150 billion but that Democratic lawmakers now refused to give President Trump $5 billion for a border wall. As has been repeatedly noted, the Obama administration did not gift money to Iran but instead unfroze Iranian assets totaling approximately $50 billion. The United States did not control that money, as it was held in overseas banks, and thus it could not be gifted in any event. This meme circulated widely, with approximately 189,000 engagements, compared with 4,500 engagements on Facebook with the fact-check by Snopes. Moreover, this meme was revived in February 2019 with only slight variation and received an additional 148,000 engagements on Facebook before a fact-check by

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73 Though the image was widely circulated in December 2018, it is not known who the first poster was. An example post from December 20, 2018 is provided infra at note 80. However, the claim was debunked as early as December 14, 2018. Not Real News: A Look at What Didn’t Happen this Week, ASSOCIATED PRESS (Dec. 14, 2018), https://apnews.com/ee80521eb992495eb45e343290b6af2e [https://perma.cc/5H5F-F6YX]; Democrats and Obama Did Not Give $150 Billion to Iran, ASSOCIATED PRESS (Dec. 14, 2018), https://apnews.com/afx:Content:2693370009 [https://perma.cc/8LHK-GA97].
75 Id.
76 Funke, supra note 67.
FactCheck.org. President Trump repeated this lie several times, most recently in the aftermath of the Qasem Soleimani assassination.

2. Attacks on Politicians of Color

Two targets of propaganda campaigns are Congresswomen Alexandra Ocasio-Cortez and Ilhan Omar, two women of color. Numerous memes appeared in the immediate aftermath of the Notre Dame fire claiming that Muslims set the fire and that Congresswoman Omar endorsed the fire as justified arson. Similarly,

propagandists circulated a false tweet of Congresswoman Omar calling for violence against Americans in response to actions taken against Iran.


Ilhan Omar says she's ashamed to be an American. Well, real Americans are ashamed you're an American, too.

5:27 PM · Jan 4, 2020 · Twitter for iPhone

16.9K Retweets 73.7K Likes

85 See Alex Kaplan (@AlKapDC), TWITTER (Jan. 4, 2020, 9:55 PM), https://twitter.com/AlKapDC/status/1213685383193649152/photo/1 [https://perma.cc/54YX-NCU3].
The legitimate tweet has no such language:

A Trump campaign official tweeted a video of rocket fire, claiming that it was a video of rockets “fired into Israel from Gaza” and asked if Congresswoman Omar would condemn the video.\(^\text{88}\)


The video is not of any action in the Gaza Strip. It was taken in Ukraine in 2015. Interestingly, the false attribution of photos from Israel/Palestine and Ukraine is a favored tactic of Russian propagandists, who have repeatedly misattributed photos of Israeli civilians as terrorized Ukrainian separatists.

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Attacks on Congresswoman Ocasio-Cortez generally do not focus on Islam, but instead on imagined financial irresponsibility and inauthenticity. A meme falsely claiming that Congresswoman Alexandria Ocasio-Cortez “was fired from ‘Hot Dog on a Stick’ in 2008 for incompetence [a]nd the Democrats elected her to Congress” was combated, with a fairly low number of engagements with the false meme and a higher number of engagements with the fact check.93 Similar memes involving alleged firings and evictions also failed to gain much traction.94

92 Id.
Alexandra Ocasio-Cortez was fired from “Hot Dog on a Stick” in 2008 for incompetence. And the Democrats elected her to Congress.


Congresswomen Cortez, from New York city, has been selected to be on the house finance committee, her credit score is 430 and has had two checking accounts closed, along with two sheriff evictions.

Evon, supra note 94.
Other memes attack Ocasio-Cortez for supposed inauthenticity. Numerous propaganda threads were created to attack Ocasio-Cortez in relation to children held in detention camps.98


99 Id.

100 Id.
Right-wing propaganda threads criticized the photos as staged and that, in fact, Ocasio-Cortez was crying over an empty parking lot.\footnote{This meme can be found in meme archives, see, e.g., AOC Memes, MEME https://me.me/i/such-pain-such-anguish-oh-the-humanity-psyche-its-just-d8567acbac01417fafa79ecfe297e22 [https://perma.cc/NNU8-9GV2], and has been used in right-wing blogs, see, e.g., Joe Miller, \textit{AOC Was Actually Facing an Empty Parking Lot During Emotional Border Protest Photo Op}, \textit{RESTORING LIBERTY} (June 30, 2019), https://joemiller.us/2019/06/aoc-was-actually-facing-an-empty-parking-lot-during-emotional-border-protest-photo-op/ [https://perma.cc/RF7M-NKE2].}

III. CHALLENGES TO FACT-CHECKING: INTERNAL DISRUPTION AND EXTERNAL IMITATION

The importance of fact-checking is paramount in the face of dangerous misinformation. The previous section detailed various attack campaigns, showing varying degrees of success at combating the misinformation. Sadly, the fact-checking mission is under threat from actors within the fact-checking ecosystem (that is, fact-checking groups and the social networks themselves) and actors outside the fact-checking ecosystem, including foreign and domestic propagandists. This section details these threats, with particular attention paid to imitation fact-check organizations.

\footnote{See Palma, \textit{supra} note 98.}
A. Internal Challenges to Fact-Checking

The fact-checking mission faces numerous threats internal to the fact-checking ecosystem, including the challenge of interfacing with social media providers (who themselves are under pressure to adopt more right-wing voices\textsuperscript{103}) and the tendency to engage in false equivalency in order to appear unbiased.

1. Relationships with Social Media Providers

While Facebook pledged to conduct a greater fact-checking mission,\textsuperscript{104} the results have been underwhelming. Critics noted that social media fact-checking efforts appeared to suffer from poor integration and anemic support.\textsuperscript{105} As of this writing, Snopes, a major partner in the fact-checking effort, has dropped out of its agreement with Facebook.\textsuperscript{106}


\textsuperscript{106} Vinny Green & David Mikkelsen, A Message to Our Community Regarding the Facebook Fact-Checking Partnership, SNOPEG (Feb. 1, 2019), https://www.snopes.com/sno pes-fb-partnership-ends/ [https://perma.cc/CU6P-9BGU]; Levin, supra note 105 (“Current and former Facebook factcheckers told the Guardian that the tech platform’s collaboration with outside reporters has produced minimal results and that they’ve lost trust in Facebook, which has repeatedly refused to release meaningful data about the impacts of their work”).
Of greater concern is the integration of propagandist-linked organizations into the fact-checking mission. Facebook has added CheckYourFact, the fact-checking affiliate of The Daily Caller, as a fact-checking partner.\(^7\) The Daily Caller has repeatedly hosted misinformation linked with White Nationalists, along with other propaganda.\(^8\) While CheckYourFact claims it is editorially independent of The Daily Caller, any relationship with a known source of propaganda is difficult to square with the fact-checking mission. In addition, the Facebook-CheckYourFact partnership comes on the heels of reports that Facebook executives argued that content originating from The Daily Caller and Breitbart News should be elevated in the Facebook newsfeed.\(^9\) Indeed, Facebook’s novel “Facebook News” will include Breitbart as a “trusted” source, a curious decision in light of Breitbart’s repeated trafficking of falsehoods.\(^10\)

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External governmental pressure is also driving an adoption of right-wing voices in the fact-checking mission. Rumors of a planned executive order stripping immunity as publishers of third-party content under the Communication Decency Act (CDA) Section 230 from "political[ly] biased" social media sites are certainly a cause for concern. Moreover, President Trump has repeatedly tweeted claims that Google is biased against conservatives, with ominous threats that he will be "watching Google very closely!" The President's baseless claim that Google somehow "manipulated from 2.6 million to 16 million votes for Hillary Clinton in 2016 Election!" suggests that the current government will press for more favorable media coverage of right-wing candidates. More recently, conservative politicians made this effort overt, causing Facebook to pull down and delay the dissemination of a fact-check, which pointed out that statements made by an anti-abortion group were in fact untrue.


\[\text{Id.}

\[\text{Id.}


\[\text{Id.}

2. The Creeping False Equivalence of Fact-Checking

Fact-checking is also under threat from the “press’s strong preference . . . for procedural balance. *The program’s supporters say this, its critics say that, so we’ll quote both sides and leave it to you, the public, to decide who is right.*”\(^{117}\) This approach can lead to false equivalence: the treatment of obvious lies as possibly true or a motivation to find an equal amount of mendacity on both sides of an issue.\(^{118}\) Due to the repeated need to fact-check President Trump in the face of incessant fabrications, mainstream fact-checkers appear to have attempted to manufacture false claims from progressive politicians. Critics have noted that this both-side-ism or false equivalence springs from a desire to appear objective.\(^{119}\) On several occasions, literally true statements were awarded mixed fact-check scores on dubious semantic interpretations.

For example, the *Washington Post* fact-checker, Glenn Kessler, took issue with a statement by Senator Bernie Sanders that “[n]ot one major Wall Street executive went to jail for destroying our economy in 2008 as a result of their greed, recklessness, and illegal behavior. No. They didn’t go to jail. They got a trillion-dollar bailout.”\(^{120}\) Kessler awarded the statement two Pinocchios,\(^{121}\) based on the fact that banks received approximately $500 billion under the Troubled Asset Relief
Program (TARP). The problem with this fact-check is that Sanders’ use of “bailout” need not be limited to TARP funds, but could logically include emergency loans and other financial benefits (totaling well over $1 trillion) given to keep institutions solvent.

The U.S. Government Accountability Office 2011 study of the economic crisis of 2008 notes that Federal loans to Wall Street banks amounted to more than $14 trillion dollars, with Citigroup, Merrill Lynch, and Morgan Stanley receiving more than $7 trillion between them. Kessler responded to this criticism by claiming that “there is a definitional issue about what one considers a bailout,” implying that Fed loans were not part of this total. This specious defense is further weakened by numerous other financial benefits awarded to banks due to the global financial crisis. The Washington Post’s odd interpretation was widely derided, with the Wall Street Journal noting the Post’s fact-checkers had taken a “novel view of government assistance.”

Kessler has unfortunately awarded Pinocchios for several statements that are demonstrably true. Kessler criticized Sanders’ statement that “millions of Americans are forced to work two or three jobs just to survive.” Kessler claimed this was a “misleading statement” because while it is true that 8 million people hold multiple jobs, this 8 million “amount[s] to just 5 percent of Americans with jobs.” Again, Sanders’ statement did not concern percentages, and 8 million would render the

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122 Kessler, supra note 120.
125 Kessler, supra note 120.
129 Id.
claim of “millions” true. Kessler also criticized Sanders for the claim that “[t]hree people in this country own more wealth than the bottom half of America.”

Kessler conceded that this was true, but claimed it was comparing “apples to oranges.”

Odd fact-checking decisions are not restricted to the Washington Post. The Associated Press (“AP”) adopted a very strange approach to fact-checking when it claimed to fact-check the Democratic response to President Trump’s State of the Union address. “AP FACT CHECK: Democrats put the blame for the shutdown on Trump. But it takes two to tango. Trump’s demand for $5.7 billion for his border wall is one reason for the budget impasse. The Democrats’ refusal to approve the money is another.” As an initial matter, the concept of blame does not lend itself well to fact-checking. Moreover, the AP’s fact-check does not seem to identify a false statement. The refusal of one party to accede to another party’s demands is not typically discussed in such balanced terms.

The New York Times had a similarly narrow interpretation in a fact-check of the Democratic response by Senator Chuck Schumer: “No president should pound the table and demand he gets his way or else the government shuts down, hurting millions of Americans who are treated as leverage.” The Times noted, “This needs context. An estimated 800,000 federal workers are furloughed or working without pay due to the shutdown. While millions of Americans are not being directly harmed, there is a multiplier effect when considering family members . . . This also spills into the broader economy.” Again, the only way to render the (frankly normative) statement as ambiguous and requiring context is to narrow the “hurt” described by Schumer to direct financial harm caused by losing a paycheck. But there is no reason to do so. Schumer’s statement could reasonably include the harm of loss of government services, reduced access to national parks and museums, and other direct deprivations.

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131 Id.


134 Id.

B. External Threats to Fact-Checking

While the analyses discussed above hinged on strained readings of statements, they at least have some basis in fact. In contrast, fake fact-checking sites exist only to impersonate fact-checking organizations and to spread misinformation. This section catalogs the numerous examples of this phenomenon. False fact-checkers appear to take four forms: 1) creating a new fact-checking site that peddles false news; 2) impersonating known fact-checking groups to undermine the target group’s credibility; 3) impersonating news media companies that regularly employ fact-checkers; or 4) adopting a baldly partisan approach to “fact-check” opinion pieces.

1. Fake Fact-Checking Groups: Pushing Propaganda in the Guise of Fact-Checking

A logical consequence of elevating the importance of fact-checkers in social media news dissemination is that propagandists will attempt to create sympathetic fact-checkers to lend credibility to false statements. The invention of new fact-checkers has a significant drawback, however, in that the newly created fact-check organization will not have banked much good-will. As such, the “fact-check” organizations have little credibility in the face of obviously false assessments. Propagandists may attempt to reduce this weakness by creating seemingly genuine fact-checking sites long in advance of targeted propaganda campaigns—“sleeper” fact-checkers that only engage in an information-polluting mission several years after establishment. This section examines three such efforts connected to Saudi Arabia, Turkey, and Sweden.

(a) Saudi Arabia: False Fact-Check Creates False Narrative in Khashoggi Assassination

In response to the assassination of journalist Jamal Khashoggi by Saudi Agents in the Saudi consulate in Turkey, a fake fact-check group was created to spread disinformation about the killing. While this bizarre attempt at misinformation ultimately failed, it is an instructive case study in false fact-checks.

To briefly summarize: Khashoggi, a journalist and frequent critic of the Saudi Government, went missing after entering the Saudi consulate in Turkey. The Saudis claimed that Khashoggi had left the consulate, and insisted that they had nothing to hide. A key witness in the matter of Khashoggi’s disappearance was

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137 Id. Saudi agents had attempted to mask the killing by impersonating Khashoggi immediately after his murder, with the hope that sightings of the false-Khashoggi would dispel suspicion of foul play. David D. Kirkpatrick & Ben Hubbard, Jamal Khashoggi Body


his fiancé, Hatice Cengiz, who reported that she saw Khashoggi enter the consulate and that he did not leave.\textsuperscript{138} The existence of Cengiz thwarted Saudi attempts to cover up the murder. In the early days of the scandal, it was therefore important for Saudi propagandists to attempt to undermine Cengiz’s version of events to support the Kingdom’s false narrative that Khashoggi left the embassy alive.

Saudi propagandists countered Cengiz’s account by claiming that Cengiz was not actually in a relationship with Khashoggi but instead was a foreign agent slandering the Kingdom.\textsuperscript{139} The \textit{Saudi Gazette}, in a story entitled “3 Figures Behind Slanderous Campaign Against Saudi Arabia”\textsuperscript{140} referred to Cengiz as Khashoggi’s “self-claimed fiancé,” unknown to Khashoggi’s family. The newspaper also claimed that Cengiz “endorses people who are critics of Saudi Arabia, organizations known to enjoy Qatari funding, Muslim Brotherhood members and Turkey’s ruling party.”\textsuperscript{141} This propaganda was made more explicit in sites like WeeklyBlitz, which published “Khashoggi’s fiancé Hatice Cengiz is a deep-cover agent of Turkish spy agency,”\textsuperscript{142} while also tying Khashoggi to the Muslim Brotherhood.\textsuperscript{143} At the same time, memes began to appear, claiming Cengiz was actually a male agent.

\begin{quote}
\textsuperscript{138} Jamal Khashoggi’s Death, supra note 136.


\textsuperscript{141} Id.


\end{quote}
While false stories and memetic misinformation is not novel, the Saudis also attempted to bolster these stories through fact-checking. A new “fact-checking” group, Middle East Guardians, was created approximately one week before the Khashoggi assassination. Immediately after the murder, the supposed fact-check group posted a photograph of Khashoggi with Cengiz and claimed that forensic analysis showed the photograph had been photoshopped to insert Cengiz. This, they concluded, was proof that the Kingdom “is being framed for a very possible murder of Jamal Khashoggi.” This baseless claim was widely circulated. However, other fact-checking groups debunked this claim, with forensic experts noting numerous inconsistencies in the purported analysis. The Kingdom later admitted the murder occurred (though limiting the conspiracy to 11 unnamed agents).
individuals) after the Turkish government revealed that it had an audio recording of the killing and dismemberment of Khashoggi.\textsuperscript{151}

\begin{itemize}
\item \textbf{(b)} \textit{Turkey: Fact-Checking Away Provable Atrocities}
\end{itemize}

Pro-Turkey groups have similarly engaged in fake fact-checking, though these fact-checks largely take the form of single-issue websites. In one such case, the website FactCheckArmenia\textsuperscript{154} is devoted to fraudulent fact-checks facilitating the denial of the Armenian Genocide.\textsuperscript{155} For example, the site focuses on the dispute of the total death figure, with estimates ranging from 500,000 to 1.5 million dead, to show that there is no historical consensus on the event.\textsuperscript{156} The group previously

\begin{itemize}
\item \textsuperscript{152} Aleisa, \textit{supra} note 146.
\item \textsuperscript{153} \textit{Id.}
\item \textsuperscript{156} See \textsc{Fact Check Armenia}, \textit{supra} note 154 (“DID THE ARMENIAN CASUALTIES AMOUNT TO 1.5 MILLION?”).}


garnered attention when it paid skywriters to call the Genocide a “Geno-Lie” and took out a full-page ad in the Wall Street Journal. The similarly-named FactCheckingTurkey exists to counter criticism of the Erdogan regime.

(c) Sweden: Fake Fact-Checker Pushes Anti-Immigrant “No-Go” Zones Myth

In Sweden, a fake fact-check group, “Mediekollen,” was created on Facebook. While containing a number of false claims, the page specifically grants an approved stamp to Swedish author and right-wing commentator Katerina Janouch. The “fact-check” concerned Janouch’s comments to a Czech television station, DVTV, that Sweden was being destroyed by immigration and that the country had more than 50 “no-go” zones. Mediekollen rated these comments as true.

“No-go” zones on the basis of immigration are a common right-wing trope. In 2017, President Trump declared there are “no-go” zones in the United Kingdom due

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162 Id.


164 See Jackson, supra note 163.
to radical Islamists, which occasioned a correction by Theresa May.\footnote{2018} This mirrored a series of tweets, dating back to 2015, in which Trump retweeted videos produced by fascist group, Britain First, and approved of reports in the Daily Mail and Fox News claiming that the city of Birmingham is a “no-go” zone for non-Muslims.\footnote{2015} Pete Hoekstra, Trump’s Ambassador to the Netherlands, was forced to admit that in 2015, he had falsely claimed Muslim teens had created “no-go” zones in the country and had set politicians afire.\footnote{2016}

Anders Lindberg, a Swedish journalist, noted that the fact-check was sent to him by Janouch’s supporters.\footnote{2016} “People started linking to this site, challenging the narrative. ‘Here we have this fact checker, and this fact checker says that she is right.’ [Janouch] was sharing this fact checker as proof that she was right.”\footnote{2016}

2. \textit{Imposter Fact-Checkers Posing as Genuine Sites}

As noted above, creating new fact-checking sites can allow propagandists to promote “checked” narratives, but with the constraint that a new site does not have requisite credibility or good-will. Propagandists without the benefit of time can duck the obstacle of poor credibility by impersonating other fact-checkers. This not only grants the propagandist the credibility of the original site, it also has the added benefit of damaging the credibility of the original, genuine fact-checker. While this sort of approach can sound far-fetched, it is important to recognize that it is already ongoing. Imposter fact-checking sites have been documented in Sweden and Brazil.\footnote{2016} Unsurprisingly, both countries have also seen intense misinformation


\footnote{2016} See Jackson, supra note 163.

\footnote{2016} Id.


\begin{itemize}
\item \textit{(a) Swedish Fact-Check Impersonated to Push Russian Propaganda}
\end{itemize}

The imposter site Faktiskt.eu began publishing Russian propaganda pieces. One was a purported fact-check of the Skripal poisoning, concluding that the claim that Russia poisoned the former spy was “probably false” and a “rumor” started by “all major media in the western world.” Another involved the hack of the U.S. Democratic National Committee (DNC) servers by Russia, and judged “the claim that Russia hacked the Democrats’ server and [gave] it [to] Wikileaks as probably false.” Notably, this second determination relied on articles by The Daily Caller and Fox News to argue that the FBI could not be trusted, as it was biased against Trump and that the DNC leak was sourced to Seth Rich, itself a debunked right-wing conspiracy.

The imposter site (Faktiskt.eu) also contained a false story claiming that the HPV vaccine causes cancer. While anti-vaccine propaganda does not originate only from foreign actors, a study of retweeting patterns of Russian bots shows that they

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amplify anti-vaccine content.\textsuperscript{180} Moreover, Russian actors used vaccination as a political wedge during the lead up to the 2016 election, tweeting with the hashtag #VaccinateUS.\textsuperscript{181} This Internet Research Agency ("IRA")-linked effort pushed tweets designed to elicit anti-government bias: “Did you know there was a secret government database of #vaccine-damaged children? #VaccinateUS.”\textsuperscript{182} While the IRA campaign did not gain much traction,\textsuperscript{183} the presence of anti-vaccine propaganda on an imposter site promoting other, more obvious Russian propaganda should not distract from the conclusion that the site was linked to Russian interests.


\textsuperscript{181} \textit{Id.} at 1379.

\textsuperscript{182} \textit{Id.} at 1383.


\textsuperscript{184} Karlsson, \textit{supra} note 174.

(b) Brazil Fact-Check Impersonated to Discredit Legitimate Fact-Checker

In Brazil, the fact-checker AosFatos was spoofed by a peddler of false news stories, who used the same brand at AosFatos.com instead of the genuine AosFatos.org. The imposter site AosFatos.com had very limited engagement. However, it was linked to five other fake news outlets: O Detetive, Plantão Brasil, Notícias Brasil Online, Pensa Brasil, and Descobrindo As Verdades. Together, these outlets had more than 3 million visits in October 2018, immediately before the Brazilian election. These outlets have been repeatedly debunked by the legitimate Aos Fatos, hinting that the attempt to spoof the site was a deliberate campaign to dilute the Aos Fatos brand and weaken its credibility.

3. Impersonating Legitimate Fact-Checked Media

While the previous examples involved impersonating fact-checking organizations, propagandists have also attempted to impersonate authentic fact-checked media. This approach can lend credibility to the false story by trading on the brand of the news organization or on the reputation of the legitimate reporter falsely listed in the byline. This approach would also be harder to detect, as propagandists could spread misinformation across various domains and otherwise thwart tracing-back efforts. Due to the dangers posed by this approach, it deserves additional attention.

A Pro-Iranian misinformation group, labeled Endless Mayfly by researchers, launched a campaign to impersonate credible websites and further spread that information with bot-spammed links. The breadth of the campaign and its novel approach are worth detailing. The group used a five-step process: 1) creating fake Twitter personas purporting to be students, journalists, and social activists; 2) creating look-alike pages for legitimate media using typosquatted URLs featuring typos, Punycode, and top-level domains (e.g., independent vs. indepnedent; lesoir.be vs. lesoir.info); 3) populating content on the look-alikes with scraped content and false news; 4) using the false Twitter personas and other bots to retweet the false content and recommend it to real journalists; and 5) once the links and

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186 See Funke, Website Impersonated, supra note 170.
187 Id. This link was discovered by examining AdSense (advertising connections) and analytics codes.
188 Id.
misinformation had spread, the group would delete the original impersonating articles and direct back to legitimate sites (thereby creating the impression that the original false article summarized in a tweet was genuine, but the URL had been changed by the media institution).  

Endless Mayfly created 135 inauthentic articles across 72 domains between 2016 and 2018. Articles typically involved anti-Saudi, anti-Israeli, or anti-American content, with the main focus on Saudi foreign relations. However, these articles blend false content with some genuine quotes and are generally far more subtle than the more polarized click-bait approach of Russian misinformation campaigns. These articles included impersonated established news outlets, such as Bloomberg News, Le Soir, The Independent, The Guardian, Der Spiegel, and The Atlantic. On at least one occasion, a false article was picked up by a legitimate mainstream media outlet that further spread the story. In June 2017, Reuters reported that six Arab countries had demanded that Qatar be stripped of its hosting duties for the 2022 World Cup. This report was based on a false article fashioned to appear from The Local, a Swiss newspaper. Reuters’ mistaken article was, in turn, reported by several other outlets, including The Jerusalem Post and Haaretz. French right-wing politicians similarly disseminated a false article made up to appear to be a Le Soir article linking candidate Emmanuel Macron to illicit Saudi financing.

4. Dilution of the Use of “Fact Check” on Partisan Sites

Lastly, there is widespread misuse of the phrase “fact check” on partisan sites. This is of concern as readers may disregard fact-checking as a meaningless, motivated exercise if all content is claimed to be fact-checked. The notion that
content has been fact-checked is advanced through fact-check buttons, stickers, and prominent mention of the phrase in headlines. For example, anti-vaccine sites may claim they have been fact-checked because internally authored “articles are fact-checked, vetted and verified using Associated Press and Society of Professional Journalists journalism standards.” Political mailers critical of mainstream media frequently claim they have fact-checked published stories. For example, Devin Nunes sent out a 38-page mailer purporting to fact check the Fresno Bee.

IV. SUGGESTED SOLUTIONS AND AREAS OF FURTHER STUDY

The diverse threats posed by attacks on fact-checkers counsel the use of a wide pallet of solutions. This section briefly details three such approaches for further discussion and study: intellectual property-based solutions, greater campaigns for user awareness, and robust protections of social media from claims of bias.

A. Intellectual Property as Shield: Preventing Cybersquatting by Robust Rights Protection Mechanisms at Domain Level and Pulling Down Infringing Content

Propagandists designing imposter fact-checkers are engaging in cybersquatting and typosquatting. That is, propagandists are registering similar domains to legitimate organizations to camouflage false content. Currently, the fastest means brands have to pull down cybersquatting sites is using the Uniform Rapid Suspension System (“URS”) through the domain-regulating Internet Corporation for Assigned Names and Numbers (“ICANN”). However, this procedure is limited to certain generic domains, has no penalty mechanism, and is purely reactive. ICANN should adopt more proactive rights protection mechanisms (“RPM”) to prevent cybersquatting propagandists. These efforts could include automatic bars to likely target domains and typo-generated URLs. While expansive at first glance, these protections could be limited to registered news-gathering organizations in the

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201 See, e.g., supra Section III.B.2(a) at notes 172, 177 and accompanying text (discussing the use of different top level domains to impersonate Faktiskt); supra notes 186, 188 and accompanying text (discussing the use of typosquatting against AosFatos).


first instance (though it is entirely predictable that powerful brands would request similar protections). The difficulties attendant to cybersquatting have been studied for over two decades. However, the threat of election interference provides greater motivation for proactive protection. Moreover, state willingness to engage in internet shutdowns during periods of extreme cyber-misinformation campaigns may demonstrate to ICANN the severity of the situation.

In the context of imitators hosted on social networks, social networks’ terms of service in relation to removal policies for trademark infringement could be broadened for news organizations. While the Digital Millennium Copyright Act (DMCA) take-down policies on such sites contemplate copyright infringement, most sites treat trademark violations similarly (no doubt motivated in part by the decision of the U.S. Court of Appeals for the Second Circuit in Tiffany (N.J) Inc. v. Ebay Inc.). It is well-established that while social media companies may be slow to react to offensive, false, or harmful content, intellectual property violations are

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205 See, e.g., Faktagranksare, Hackade, supra note 178 (using false fact checker to deny Russian involvement in DNC hack).


210 600 F.3d 93, 107–08 (2d Cir. 2010). The court found that the contributory trademark infringement claim against service provider eBay turned on whether the company (1) has contemporary knowledge about particular items on its site that infringe or will infringe in the future and (2) subsequently refuses to act on that knowledge. This case has been interpreted to provide a set of incentives similar to the DMCA. See generally Andrew Lehrer, Tiffany v. Ebay: Its Impact And Implications on the Doctrines of Secondary Trademark and Copyright Infringement, 18 B.U. J. SCI. & TECH. L. (2012).

211 See Moshirnia, supra note 4, at 150.
another matter entirely. Individually infringing posts, i.e., those hosting copyrighted content or derivative works thereof, may be pulled down through DMCA notifications.\textsuperscript{212}

\section*{B. Social Media Companies Lead Education Campaigns}

As propagandist efforts may succeed in diminishing the credibility of fact-checkers, efforts should be taken to train readers to be more critical. This could involve such simple techniques as verifying the URL of the embedded links, or more complex techniques such as using reverse image searches to determine if graphics within a meme are reused or misattributed.\textsuperscript{213} There could also be “think before you tweet” anti-propaganda campaigns in the same vein as anti-rumor posters in World War II.\textsuperscript{214}

\begin{footnotesize}
\begin{enumerate}
\item Id.
\item Id. at 144–47.
\end{enumerate}
\end{footnotesize}
It is entirely predictable that social media companies will enthusiastically back these efforts as a focus on consumer education will displace responsibility for content curation. While Facebook is in a better position to detect deep fake videos than layman users, providing an additional layer of defense in the form of a critical public is an unalloyed good.

C. Reiteration of First Amendment and Statutory Protections for Social Media Fact-Checking

While President Trump’s rumoured (but not yet issued) executive order\(^\text{219}\) that would strip protections from “biased” social media sites may not come to pass, it is important to safeguard social media fact-check efforts from motivated governmental attack. A Congressional reiteration of constitutional and statutory\(^\text{220}\) protections afforded to fact-checking social media sites (and the subsequent promise to

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\(^{219}\) See Fung, supra note 111.

challenge any order purporting to strip those protections) could help shield social media providers from threats of intervention undergirded by claims of bias.

V. CONCLUSION

This Essay illustrated that misinformation campaigns continue to plague social media with propagandists enjoying a first-mover advantage. While fact-checks can succeed in pulling down some untrue content, we should anticipate that propagandists and individuals who benefit from propaganda will attack the fact-checking mission. One such avenue of attack is the creation of imitation fact-checkers. This Essay documented multiple instances where false fact-checkers have been detected and defeated. Accordingly, concerned actors must mobilize multifaceted countermeasures in response to this ongoing attack. Although the situation may appear grim, the nation need not adopt draconian policies221 in order to safeguard democracy. Instead, the nation must empower individuals through efforts to increase awareness of the misinformation threat and create numerous barriers to the spread of false information. These would include the facilitation of rapid removal of imitation fact-checkers, public education campaigns detailing the hallmarks of misinformation and of false fact-checks, and a reassurance that “anti-bias” measures will not punish social networks for labelling false content as false.

221 There is no reason to imitate India’s Internet shutdowns or adopt President Trump’s motivated “anti-bias” approach. See supra notes 206, 220 and accompanying text.