

September 19, 2018

By Email and via FedEx

Mr. Michael Rallings  
Director, Memphis Police Department  
Memphis Police Department  
170 N. Main Street  
Memphis, TN 38103

Dear Mr. Rallings:

We recently learned through media reports and the Electronic Frontier Foundation (EFF) that the Memphis Police Department created fake Facebook accounts and impersonated legitimate Facebook users as part of its investigation of alleged criminal conduct unrelated to Facebook. We write to underscore that this activity violates our terms of service. The Police Department should cease all activities on Facebook that involve the use of fake accounts or impersonation of others.

People come to Facebook to connect and share with real people using their authentic identities. This core principle is what differentiates Facebook from other services on the Internet. Our authenticity policies are intended to create a safe environment where people can trust and hold one another accountable. Operating fake accounts violates the terms and policies that govern the Facebook service, and undermines trust in our community (<https://www.facebook.com/communitystandards/misrepresentation>).

Anyone who creates a Facebook account agrees to abide by our Community Standards, which expressly prohibit the creation and use of fake accounts. The Community Standards provide as follows:

- Do not misrepresent your identity by using a name that does not abide by our name policies (<https://www.facebook.com/help/112146705538576>) or providing a false date of birth.
- Do not misuse our profiles product by:
  - Creating a profile for someone under thirteen years old
  - Maintaining multiple accounts
  - Creating inauthentic profiles
  - Sharing an account with any other person
  - Creating another account after being banned from the site
  - Evading the registration requirements outlined in our Terms of Service (<https://www.facebook.com/legal/terms>)
- Do not impersonate others by:
  - Using their images with the explicit aim to deceive people
  - Creating a profile assuming the persona of or speaking for another person or entity

facebook

Address: 1601 Willow Road  
Menlo Park, CA 94025

- Creating a Page assuming to be or speak for another person or entity for whom the user is not authorized to do so.
- Do not engage in authentic behavior, which includes creating, managing, or otherwise perpetuating:
  - Accounts that are fake
  - Accounts that have fake names
  - Accounts that participate in, or claim to engage in, coordinated inauthentic behavior, meaning that multiple accounts are working together to do any of the following:
    - Mislead people about the origin of content
    - Mislead people about the destination of links off our services (for example, providing a display URL that does not match the destination URL)
    - Mislead people in an attempt to encourage shares, likes, or clicks
    - Mislead people to conceal or enable the violation of other policies under the Community Standards

Facebook has made clear that law enforcement authorities are subject to these policies. We regard this activity as a breach of Facebook's terms and policies, and as such we have disabled the fake accounts that we identified in our investigation.

We request that the Police Department, its members, and any others acting on its behalf cease all activities on Facebook that involve impersonation or that otherwise violate our policies.

Please contact us if you have any questions or concerns.

Sincerely,



Andrea Kirkpatrick  
Director and Associate General Counsel, Security