



U.S. Department of Justice

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District of Columbia

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Wikimedia Foundation, Inc. AKA Wikipedia
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To Whom it May Concern,

As the United States Attorney for the District of Columbia, I regularly receive requests for information, clarification, and official comment. I regard such inquiries with the seriousness they warrant and respond appropriately through formal correspondence, such as this letter.

It has come to my attention that Wikipedia, which operates via its fiscal sponsor, the Wikimedia Foundation, Inc., is engaging in a series of activities that could violate its obligations under Section 501(c)(3) of Title 26 of the United States Code. As a nonprofit corporation, which is incorporated in the District of Columbia, the Wikimedia Foundation is subject to specific legal obligations and fiduciary duties consistent with its tax-exempt status. In addition, the public is entitled to rely on a reasonable expectation of neutrality, transparency, and accountability in its operations and publications.

In its 2023 IRS Form 990, the Wikimedia Foundation describes its mission as, “empower[ing] and engag[ing] people around the world to collect and develop educational content under a free license or in the public domain and to disseminate it effectively and globally. . . [.]”

As you know, Section 501(c)(3) requires that organizations receiving tax-exempt status operate **exclusively** for “religious, charitable, scientific, testing for public safety, literary, or educational purposes. . . [.]” It has come to my attention that the Wikimedia Foundation, through its wholly owned subsidiary Wikipedia, is allowing foreign actors to manipulate information and spread

propaganda to the American public. Wikipedia is permitting information manipulation on its platform, including the rewriting of key, historical events and biographical information of current and previous American leaders, as well as other matters implicating the national security and the interests of the United States. Masking propaganda that influences public opinion under the guise of providing informational material is antithetical to Wikimedia's "educational" mission.

In addition, Wikipedia's operations are directed by its board that is composed primarily of foreign nationals, subverting the interests of American taxpayers. Again, educational content is directionally neutral; but information received by my Office demonstrates that Wikipedia's informational management policies benefit foreign powers.

Moreover, we are aware that search engines such as Google have agreed to prioritize Wikipedia results due to the relationship that Wikipedia has established with these tech platforms. If the content contained in Wikipedia articles is biased, unreliable, or sourced by entities who wish to do harm to the United States, search engine prioritization of Wikipedia will only amplify propaganda to a larger American audience.

Lastly, it has come to our attention that generative AI platforms receive Wikipedia data to train large-language models. This data is now consumed by masses of Americans and American teachers on a daily basis. If the data provided is manipulated, particularly by foreign actors and entities, Wikipedia's relationship with generative AI platforms have the potential to launder information on behalf of foreign actors.

In light of these concerns, my Office seeks information pertaining to Wikimedia's compliance with the laws governing its tax-exempt status. To assist with our investigation of this matter, I request the following documents and information, covering the time period of January 1, 2021 to the present, as soon as possible but no later than May 15, 2025:

1. What mechanisms does the Wikimedia Foundation have in place to fulfill its legal and ethical responsibilities to safeguard the public from the dissemination of propaganda, particularly in light of its designation as a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code and in light of the Foundation's longstanding hands-off policy regarding Trust & Safety (including content moderation and editor misconduct)?
2. Regarding Trust & Safety, what does the Foundation provide in terms of employees and contractors, budget, day to day oversight, and enforcement mechanisms, for the purposes of content moderation and actioning of editor misconduct? Here, editor misconduct includes but is not limited to content manipulation, bullying, and off-platform canvassing (for edits or committee elections).
3. How does the Foundation ensure transparency and accountability regarding the extent to which its editorial practices and platform governance are influenced by ongoing relationships with donors, sponsors, funders, or other external stakeholders?
4. What steps has the Foundation taken to exclude foreign influence operations from making targeted edits to categories of content in order to reshape or rewrite history? Who enforces these measures, and how? What foreign influence operations have been detected, and what did the Foundation do to reverse their influence and prevent it from continuing?

5. What policy does the Foundation have in place to ensure that content submissions, editorial decisions, and article revisions reflect a broad spectrum of viewpoints, including those that may be in tension with the views of major financial or institutional backers?
6. What is the Foundation's official process for addressing credible allegations that editors or contributors have materially misled readers, engaged in bad-faith edits, or otherwise manipulated content in ways that undermine Wikipedia's commitment to neutrality? Similarly, what is the Foundation's official process for auditing or evaluating the actions, activities, and voting patterns of editors, admins, and committees, including the Arbitration Committee, in order to ensure the Foundation's policies and the policies of its projects are enforced? Detail all instances in which these processes have been utilized in the last six years.
7. Does the Foundation maintain a public, formally adopted policy explicitly prohibiting hateful content and conduct by editors? If so, what enforcement mechanisms are in place to ensure compliance and accountability, and which namespaces and content on the platform do these mechanisms apply to? Further, how does the Foundation ensure that sources used in writing content on Wikipedia and elsewhere do not violate its policies, including but not limited to those against discrimination?
8. Given growing public concerns regarding the large-scale manipulation of particular categories of content by ideologically motivated editors, what safeguards exist to detect and prevent undue influence by individuals or coordinated networks who use editorial or administrative authority to systematically distort content? Provide details regarding actions taken by the Foundation using these safeguards over the last six years. Additionally, detail any changes over time to these safeguards.
9. In view of public criticisms, including those expressed by Wikipedia Co-Founder Dr. Lawrence M. Sanger, regarding the opacity of editorial processes and the anonymity of contributors, what justification does the Foundation offer for shielding editors from public scrutiny? How does it reconcile this policy with broader editorial standards, which typically require attribution, accountability, and subject-matter transparency as safeguards in the public interest? What measures does the Foundation take to assess the integrity and competence of senior editors and administrators?
10. Given the anonymity protections presently afforded to all Wikipedia editors—even in cases where individuals have been banned for engaging in prohibited conduct—what internal safeguards or enforcement mechanisms exist to prevent such users from creating new accounts and resuming the same impermissible practices? In particular, how does the Foundation address concerns regarding the apparent lack of a robust and transparent process to detect, deter, and permanently exclude repeat offenders from the editorial ecosystem?
11. What third-party entities, including but not limited to artificial intelligence, large language model companies, and search engines, has the Wikimedia Foundation contracted with to use, redistribute, or process Wikipedia content? Please produce all documents, memoranda of understanding, contracts, or related agreements reflecting such arrangements, including any amendments, appendices, or correspondence pertaining thereto.
12. When editors or the Foundation delete content which was found to be harmful or illegal but has already been shared with third parties (including search engine and LLM companies), what steps does the Foundation follow in order to repair the downstream

effects of that content on search results and data already used to train LLMs? What measures does the Foundation take to ensure that these companies, as well as the broader public, understand misinformation, bias, and other problems across its projects, including Wikipedia?

I look forward to your cooperation with my letter of inquiry after request. Thank you in advance for your assistance. Please respond by May 15, 2025. Should you have further questions regarding this matter, please do not hesitate to call my office or schedule a time to meet in person.

All the best.

A handwritten signature in blue ink that reads "Edward R. Martin, Jr." The signature is written in a cursive style with a large, stylized "E" and a clear "Jr." at the end.

Edward R. Martin, Jr.
United States Attorney for the District of Columbia