

Copyright © 2023 The author/s

This work is licensed under a CC-BY 4.0 license

(*) Corresponding author

Peer review method: Double-blind

Review article

DOI: <https://doi.org/10.47305/JLIA2391331s>


Received: 15.12.2022 · Revised: 23.01.2023 · Accepted: 26.01.2023 · Published: 25.03.2023




REGULATING FAKE NEWS IN TRANSNATIONAL JURISDICTION: A COMPARATIVE STUDY OF BRAZIL AND ARGENTINA

Prabhpreet Singh^{1*}, Driton Kuqi², Vijaylaxmi Sharma³

¹Department of Law, Manipal University Jaipur, India  <https://orcid.org/0000-0002-3853-4580> ✉ prabhpreet.ufylc@gmail.com

²State University of Tetovo, North Macedonia  <https://orcid.org/0000-0002-0938-1263> ✉ driton.kuci@unite.edu.mk

³Department of Law, Manipal University Jaipur, India  <https://orcid.org/0000-0002-0135-6135> ✉ vijaylaxmi.sharma@jaipur.manipal.edu

Abstract: *Many oppressive governments have passed cyber laws, cracking down on free speech, and used less traditional tactics to restrict people's capacity to speak freely and in public. This is particularly true in nations where the government regulates media and information flow due to closed information systems. Laws regulating fake news clash with citizens' free speech and expression rights. The paper gives an overview of the hurdles in regulating transnational cases of fake news. In cases of cross-border jurisdiction, it becomes vital to examine International legal standards, such as international agreements and international institutions governing fake news. In this paper, we look at two case studies, one from Argentina and one from Brazil, to see how these countries have dealt with the issue of fake news in cases involving transnational jurisdictions. The paper concludes with the observation that various governments employ a variety of approaches and policies in order to combat fake news.*

Keywords: *Fake News; Cross-Border Jurisdictions; Freedom of Speech; Regulations*

INTRODUCTION

Lies have consistently been used to influence public opinion throughout history. However, the recent electoral procedures that took place over a tainted public debate led to the emergence of fake news as a modern phenomenon. The phenomenon has appeared repeatedly in several electoral processes since Donald Trump was elected president of the United States in 2016 with different intensity and influence. For many observers, the future of democratic systems is seriously threatened by fake news. States from all over the world have responded differently to this challenge. Some have attempted to control the practice and place onerous requirements on intermediate platforms, where fake news thrives, to moderate the content they permit. Others have worked to raise public awareness of deceptive information efforts by educating people about their presence. On the other hand, businesses have pushed to act in response to mounting and frequently conflicting pressures from international NGOs, academics, legislators, regulators, and state institutions (Klein and Wueller, 2018).

Media experts frequently say that "fake news" consists of two different forms of information: misinformation and disinformation. Disinformation is described as the deliberate spread of false news meant to mislead the public, in contrast to misinformation, which is sometimes defined as any erroneous information, regardless of motivation (Gelfert 2018).

For instance, historically speaking, First Amendment free speech rights have always been given to misleading information in the United States (US). Given that spreading incorrect information online can easily result in financial gain, there has recently been a greater motivation to do so. One of many examples is how Cameron Harris, a recent college graduate, made around \$22,000 during the US presidential campaign of 2016 by fabricating and publishing fake news pieces online (Monti 2021). Entrepreneurs in North Macedonia adept at using the internet are also known to fabricate news stories to profit from the “gold rush” of disinformation. In addition, people tend to trust programs like Google Search when looking for information while being aware that the economic models of online platforms are supported by the attention economy focused on user-generated content and engagement with such content (Albright 2017). Even though “spammers” can change search rankings and machine learning can have unintended side effects that create biases, it has been suggested that this is due to a learned heuristic that the search results are helpful and in the right order. In this way, Google’s economic dominance over the web and its effect on developing current and future digital standards do not get as much attention as they should (Jacobs 2022).

Thus, it has been suggested that the propagation of misleading information is a social issue that has unfavorable externalities by endangering the public’s ability to trust reputable news sources and the capacity of conventional journalism to play its part in upholding democratic institutions (Sperti 2022). The World Economic Forum has identified the spread of disinformation as a threat to human society due to how ubiquitous the issue has become (Park and Youm 2018). To re-establish the credibility of the Fifth Estate (i.e., non-mainstream media, which includes bloggers on social media) and the Fourth Estate (i.e., persons and organizations that report the news), there is a need to limit the amount of fake news content (Smith, Perry, and Smith 2021). Many have realized that a comprehensive strategy to combat disinformation would include the introduction of new legislation as well as the adoption of indirect policy remedies. This goes beyond better educating internet citizens to recognize bogus news (Lazer et al. 2018).

Due to the interconnectedness of communications, regulating fake news is a particularly interesting comparative law topic. As a result, the current paper reflects case studies of fake news regulations in Argentina and Brazil.

METHODOLOGY

The present paper is a case study of two vital cases: Criminal Investigation No. 4781 from Distrito Federal - Brazil (commonly known as a Fake News Case) and Federal Criminal and Correctional Chamber - Argentina (Case No. CPF 8553/2015/4 / CA3 “C., E.). The methodology is doctrinal and non-empirical. The research aims to answer the following research question (RQ1): Whether national courts can have extra-territorial jurisdiction in cases of fake news?

UNDERSTANDING FAKE NEWS AS AN OPINION

A typical definition of fake news is intentionally false factual statements disseminated through news sources. Different sorts of fake news should not be confused for legal purposes, but current usage is still in flux. No matter the author’s goal, news articles that are purposefully

produced are fake news in the strict sense (false news). However, more subtle ways exist to use knowledge to affect people's attitudes and actions. It is possible to frame and convey accurate information to encourage listeners to make particular (erroneous) inferences. This is false information in a broader sense (distorted news). Such reporting promotes and panders to the audience's biases. These assumptions can forecast the (wrong) inferences a viewer may draw from a certain presentation of actual data if they are well-established. Think about a news source that focuses solely on crimes perpetrated by foreign nationals.

This idea of fake news will be put to the test against the reporting of the 2016 "Lisa case" by the news organizations Sputnik and RT (formerly Russia Today), which receive funding from the Russian government and have a history of being accused of fabricating stories to undermine Western societies by casting doubt on the reliability of Western institutions. This assessment is shared with numerous academics by the US intelligence services, the European Parliament, and the French President (Nasu 2021).

A 13-year-old Russian-German girl named Lisa vanished in Berlin in January 2016 for roughly 30 hours. Lisa's aunt claimed that she had been kidnapped and raped by foreigners, and Channel One in Russia (also known as Pervij Kanal) was the first to report this. The German-language Sputnik carried the same information. According to Lisa's relatives, the German police declined to investigate the situation, according to both media agencies. Later, the official police statement stating that there had been no kidnapping or rape was appropriately reported by Sputnik. It also detailed the prosecution's announcement that it had opened an inquiry into Lisa's alleged sexual abuse as a minor, which involved voluntary but technically illegal non-consensual intercourse with an older male prior to the girl's disappearance (Liesem 2022).

Sputnik reported all the details while framing the incident as evidence that security issues have worsened in German towns since the 2015 immigrant crisis. Sergey Lavrov, the foreign minister of Russia, made the same connection at his yearly press conference, which took place at the same time as the probe. For whatever reason, the circumstances surrounding the loss of a Russian girl in Germany were kept quiet for a very long period. We are at least in contact with her attorney, coordinating with her family and the Russian Embassy. Lisa did not exactly choose to vanish for 30 hours. Justice and truth must prevail in this case. In an interview with RT, the family's attorney responded to the prosecutor's assertion, contrasting the (frivolous) claim of a recent kidnapping and rape with the alleged earlier sexual assault. In 2017, RT accurately revealed that a man had been charged with sexually abusing Lisa while she was a juvenile. RT also called out the "mainstream media" for accusing Lisa of lying and for traumatizing her by using her case as a platform to attack RT. Following this reporting, more than 700 people of Russian descent demonstrated in front of the Chancellery in Berlin, and many more did so elsewhere. At the time, German Foreign Minister Frank-Walter Steinmeier dismissed accusations of wrongdoing by the German authorities as "political propaganda". However, he refrained from calling them an intrusion into German internal affairs. Initially, the police held back the information out of respect for the girl and her family's right to privacy. Details about the girl's mobile phone's GPS tracking, which revealed that she had spent the time before going missing at a friend's house, were only revealed afterward. Since what was published is technically speaking genuine, RT and Sputnik's coverage of the tragedy is not fake news in the strict sense. However, given the deceptive nature of the information's presentation,

particularly its selectivity and framing, the label “distorted news” appears appropriate. Reporting in the Lisa case primarily drew on the previous New Year’s Eve events in Cologne, when hundreds of women had been sexually assaulted, mostly by people who appeared to have immigrant backgrounds. Some believed this was due to “political correctness”, which aimed to mislead the public about the severity of the issues brought on by the immigrant crisis. A similar interpretation of the Lisa case, reinforced by Lavrov’s statement, became feasible because of this way of thinking (Mejía-Trejo 2021).

INTERNATIONAL MEASURES

Article 19 of the Universal Declaration of Human Rights (UDHR) states that “everyone has the right to freedom of thought and expression, including the freedom to hold opinions without interference and to seek, receive, and spread knowledge through any medium and without respect to boundaries”. Even while the UDHR itself is not enforceable, much of it has been incorporated into international law.

Article 19 of the International Covenant on Civil and Political Rights (ICCPR) includes this basis. The ICCPR declares that “everyone shall have the right to freedom of expression; this right shall include freedom to seek, receive, and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or print, in the form of art, or through any other media of his choice”. This provision is nearly identical to the UDHR.

Furthermore, all types of audio-visuals, electronic, and internet-based platforms of expression are included in the cross-border media to which article 19 refers. Both Brazil and Argentina are signatories to the International Covenant on Civil and Political Rights. Violations of the International Covenant on Civil and Political Rights may be reported to the International Court of Justice (ICJ).

Nearly identical phrasing is used in Article 13 of the American Convention on Human Rights (ACHR) to safeguard the international right to freedom of expression locally. The American Convention on Human Rights takes a step further, instructing Member States to address expression through the subsequent imposition of liability rather than prior censorship. Additionally, it lists prohibited prohibitions such as governmental control over newspapers and other media (Albuquerque and Matos 2022). The International Covenant on Civil and Political Rights and the American Convention on Human Rights provisions under discussion give States a narrowly defined legal exception for limiting free speech, including in response to public order and national security concerns. However, it is a high bar to clear, at least in the context of the International Covenant on Civil and Political Rights, because expression cannot be restricted unless it is mandated by law and done so for a justifiable reason.

International Institutions

The Organization of American States (OAS) seeks to advance wealth and development among its Member States while bolstering peace and security within the Americas. Brazil, Argentina, and the other thirty-five independent States in the Americas, all of which have approved the Charter of the Organization of American States, are OAS Member States. Political

commitments are offered as “guidelines” by the Organization of American States. The Organization of American States does not require States to keep their political obligations, even though it is recommended. The Organization of American States’ proposals includes advice on dealing with fake news (Aymanns et al. 2022).

The Organization of American States has noted how social media and digital platforms serve as intermediaries in the information flow. While this can ease the flow, it also significantly impacts public discourse, and “a number of governments, especially authoritarian ones, have tried to pressure them to help shape the flow of information according to their interests” (Colomina, Margalef, and Youngs 2021) according to the OAS. The Organization of American States handbook also advises that “the States in the region should not adopt new criminal forms to penalize the dissemination of false information or fake news in accordance with the criteria of the inter-American human rights system” (Aymanns et al. 2022). The States could introduce criminal consequences, which would be imprecise or vague given the nature of the phenomenon, to justify criminalizing the critics or individuals involved in public interest problems. A strong chilling effect would be produced on the expression of opinions, criticism, and information resulting from this, which would be especially constrictive in the context of the electorate. Other OAS proposals include supporting universal internet access, shielding journalists and social communicators from harm, enhancing data privacy and transparency, and opposing state legal frameworks that make intermediaries accountable for the material produced by third parties. The OAS has numerous aspirational frameworks for battling state-sponsored misinformation, but their efforts are not legally binding since they are political commitments.

The Inter-American System of Human Rights, which also has its headquarters within the OAS, includes the Office of the Special Rapporteur for Freedom of Expression, the Inter-American Commission on Human Rights, and the Inter-American Court of Human Rights. Remembering that the Inter-American Court must interpret and apply the American Convention (Liesem 2022) is important. In addition to compiling reports on free speech in America, the Special Rapporteur helps the IACHR assess claims for the right to freedom of expression. The IACHR looks into allegations of human rights abuses and works to uphold those rights locally.

JUDICIAL PRECEDENTS IN BRAZIL

Facts

The Supreme Federal Court is looking into the existence of systematic use of accounts on social networks to produce, publish, and circulate false material as part of Criminal Investigation No. 4781 from Distrito Federal - Brazil (commonly known as a Fake News Case). A group of Jair Bolsonaro’s supporters’ Facebook, Twitter, and Instagram profiles were ordered to be blocked on 26 May 2020 by Alexandre de Moraes, Minister of the Supreme Federal Court. These characteristics would be used to conduct crimes against honor and crimes against criminal association (exemplified in the Penal Code in sections 138, 139, 140, and 288) and crimes against national security (exemplified in Act 7.170/1983, sections 18, 22, and 26). The probe specifically refers to assaults on the National Congress and the Supreme Federal Court (Omari 2021).

However, some individuals under investigation disobeyed the ruling by altering the websites' location settings to make it appear that they were posting from different nations. The magistrate ordered the social networks to prohibit access from any IP (Internet Protocol), whether it originates from Brazil or elsewhere, effective July 28, 2020. He set a daily punishment of \$20,000.00 for each unlocked profile to ensure compliance (The Case of the Brazil Fake News Inquiry 2021).

Contentions of Appellants

Twitter declared that it would appeal the ruling but would nonetheless follow it. While claiming the ruling was unlawful, Facebook said it would refuse to follow it. As a result, it would continue to offer those under investigation access and the ability to publish by connecting to outside accounts, enabling content viewing within the country. "We observe the laws of the countries in which we operate" (2020), claimed Facebook. Given that Brazilian law acknowledges the boundaries of its jurisdiction and the legitimacy of other countries, we have filed an appeal with the Supreme Federal Court challenging the decision to block the accounts internationally.

Court Decision

In Criminal Investigation No. 4781 from Distrito Federal judgment, minister Alexandre de Moraes issued a new decree raising the daily fee for an unblocked profile to \$100,000.00. The magistrate stated in his reasons that the social network Facebook:

must respect and effectively comply with direct commands issued by the Judiciary regarding facts that have occurred or with their persistent effects within the national territory; it is incumbent upon him, if deemed necessary, to demonstrate its non-conformity by means of the resources permitted by Brazilian law (The Case of the Brazil Fake News Inquiry n.d.).

He finally realized that:

the blocking of social network accounts decided in this case, therefore, is based on the necessity to stop the continuity of the disclosure of criminal manifestations, which, in particular, materialize the criminal offenses found in this investigation and which continue to have their illicit effects within the national territory, including the use of subterfuge permitted by the social network Facebook (The Case of the Brazil Fake News Inquiry n.d.).

Last but not least, he claimed that "the subject of national jurisdiction over what is posted and watched abroad is not considered, but the spread of criminal facts in the national territory, through news and commentary by banned accounts" (The Case of the Brazil Fake News Inquiry n.d.). Following this ruling, Facebook announced the global blocking of the accounts under investigation.

JUDICIAL PRECEDENTS IN ARGENTINA

Facts

On 14 March 2019, the judge of the grade in Argentina issued a ruling ordering Google to take down any URLs that included the supposed detention of Enrique Santos Carrió for drug and weapon possession in Mexico from its web browser's search results. Enrique is the son of Elisa Carrió, a prominent politician in Argentina currently the National Deputy (Milillo et al. 2022). The order expanded the prohibition to include three domains outside the country: www.google.com, www.google.com.es, and www.google.mx.

Contention of Arguments

Dr. Arnaldo Cisilino, the attorney for Goggle, filed an appeal against the magistrate's refusal to grant the party's request to invalidate the prolongation of the preventative measure put in place against their client's wishes. The appellant deemed the resolution unsuitable and argued it should have been sent to the news portals in charge of the publication about which it makes the untruth claim. Only in this way, the appellant underlined, could identical information spread to other URLs be stopped. It further claimed that the contentious decision intended to broaden its application to areas outside the purview of Argentine courts (Klein and Wueller 2018).

The blocking or deletion of the pages from such nations can only be done in compliance with the relevant local legislation. On the same road, the difficulty of a State interfering in the territory of another State without that State's consent was expressed through the invocation of general principles of state sovereignty, international courtesy, and resolutions passed at the international level. If Google implemented the contested judgment, it would violate the legal framework in the nations affected by that measure. It would have an impact on the domain or services that are subject to foreign law. For an Argentine magistrate to have the authority to decide what content may be read or found globally through the internet, the appellant pointed out that removing certain things from Google.com would also mean deleting them from all global servers. This would mean legitimizing other states' potential to similarly participate in excluding specific content following their national laws, with the grave repercussions that such a situation could entail. It warned that the spread and approval of orders like the one in question here would create a significant barrier to the freedom of expression and the ability to seek, receive, and disseminate information freely. In other words, it is believed that the problematic measure's expansion should be revoked to prevent illegal meddling in areas outside the intervening magistrate's territorial jurisdiction (Nogueira da Silva et al. 2022).

Court Decision

On 16 June 2020, the Court in the present case (Case No. CPF 8553/2015/4 / CA3 "C., E.) acknowledged the complexity and difficulty of labeling the news as fake. These classifications, however, cannot be imposed on foreign jurisdictions unless they do so through judicial

cooperation processes that do not infringe on their legal framework. According to its interpretation, “the core of this controversy concerns the principle of the territoriality of law, which prevents the possibility of taking for itself the prerogative to prohibit the global dissemination of certain press content whose disclosure would be prohibited under the local regulatory framework, but its circulation may be authorized in the context of another territory”. Based on this, the National Chamber of Cassation in Criminal and Correctional Matters decided not to implement the suggested preventative step, with the knowledge that, if it so chooses, the judge *a quo* may request actions to limit the distribution of such news from foreign authorities through judicial cooperation (Jacobs 2022).

CONCLUSION

The challenge in assessing the extent of national court jurisdiction over the internet is demonstrated by the two criminal court judgments looking into the dissemination of fake news. In Argentina, Google overturned a ruling that removed a person’s name from search engines located abroad. In this instance, the searcher falsely linked a person’s name to offenses, including possessing firearms and drugs. However, in Brazil, Twitter and Facebook were compelled to permanently restrict a person under investigation from accessing their accounts. These individuals are being investigated for their involvement in the online distribution of materials that defame members of the legislative and judicial branches of government. Even though these rulings were made in the context of criminal cases, the problems they raise are concerns that also occur in civil situations. Both judgments were made against businesses with branches in Argentina and Brazil, the countries where the courts have jurisdiction. However, they differ on how much that jurisdiction extends to fulfilling orders outside those countries.

On the one hand, the notion that the requirement to block access or remove content entails a duty to do so outside the national area. As a result, this choice must go via the international cooperation’s regulatory systems to impact outside the country’s borders; otherwise, other countries would be invaded. Not to mention the problems that occur from the perspective of the applicable law, according to what constitutes a defamatory act in each State and what the boundaries of free expression are. On the other hand, it is understood that regardless of where and how it takes effect, a corporation with legal personality in the nation must comply with this obligation to comply, as set down in national law. This dispels rumors about potential invasions of foreign sovereignty and concerns about potential changes in legal definitions of what constitutes legitimate expression and what is not. This discrepancy raises questions about the three traditional pillars of private international law: international jurisdiction, applicable law, and international legal cooperation. Moreover, the difficulties that the internet’s widespread use provides for this field of study cannot be ignored. The extra-territorial jurisdiction varies from one country to another.

COMPLIANCE WITH ETHICAL STANDARDS

Acknowledgments:

Not applicable.

Funding:

Not applicable.

Statement of Human Rights:

This article does not contain any studies with human participants performed by any authors.

Statement on the Welfare of Animals:

This article does not contain any studies with animals performed by any authors.

Informed Consent:

Not applicable.

Publisher's Note:

The Institute for Research and European Studies remains neutral concerning jurisdictional claims in published maps and institutional affiliations.



REFERENCES

1. Albright, Jonathan. 2017. "Welcome to the Era of Fake News." *Media and Communication* 5 (2): 87–89.
2. Albuquerque, Afonso de, and Lucineide Magalhães de Matos. 2022. "Media Governance and Fake News in Brazil." In *Media Governance: A Cosmopolitan Critique*, edited by Sarah Anne Ganter and Hanan Badr, 125–44. Global Transformations in Media and Communication Research - A Palgrave and IAMCR Series. Cham: Springer International Publishing. https://doi.org/10.1007/978-3-031-05020-6_7.
3. Aymanns, Christoph, Jakob Foerster, Co-Pierre Georg, and Matthias Weber. 2022. "Fake News in Social Networks." SSRN Scholarly Paper. Rochester, NY. <https://doi.org/10.2139/ssrn.4173312>.
4. Colomina, Carme, Héctor Sánchez Margalef, and Richard Youngs. 2021. "The Impact of Disinformation on Democratic Processes and Human Rights in the World," April 13-25.
5. Gelfert, Axel. 2018. "Fake News: A Definition." *Informal Logic* 38 (1): 84–117.
6. Jacobs, Leslie Gielow. 2022. "Freedom of Speech and Regulation of Fake News." *The American Journal of Comparative Law* 70 (Supplement_1): i278–84. <https://doi.org/10.1093/ajcl/avac010>.
7. Klein, David O., and Joshua R. Wueller. 2018. "Fake News: A Legal Perspective." *Australasian Policing* 10 (2).
8. Lazer, David MJ, Matthew A. Baum, Yochai Benkler, Adam J. Berinsky, Kelly M. Greenhill, Filippo Menczer, Miriam J. Metzger, Brendan Nyhan, Gordon Pennycook, and David Rothschild. 2018. "The Science of Fake News." *Science* 359 (6380): 1094–96.
9. Liesem, Kerstin. 2022. "Diversity, Fake News and Hate Speech: The German Response to Algorithmic Regulation." In *The Algorithmic Distribution of News: Policy Responses*, edited by James Meese and Sara Bannerman, 209–31. Palgrave Global Media Policy and Business. Cham: Springer International Publishing. https://doi.org/10.1007/978-3-030-87086-7_11.
10. Mejía-Trejo, Juan. 2021. "Social Media Information Literacy vs. Fake News: Probing the Business Decisions Under Covid-19 Times as Innovation Skills with FSQCA." SSRN Scholarly Paper. Rochester, NY. <https://papers.ssrn.com/abstract=4295568>.
11. Milillo, M. Ayelén, Soledad Gori, M. Victoria Ennis, and Pablo M. Méndez. 2022. "Fake News and Vaccination: How the Science Anti-Fake News Team in Argentina Is Fighting the Infodemic." *Medical Writing* 31 (March): 48–53.
12. Monti, Matteo. 2021. "Online Disinformation and Digital Populism in the EU and the USA: Western Constitutionalism at the Crossroads of Internet Regulation." SSRN Scholarly Paper. Rochester, NY. <https://doi.org/10.2139/ssrn.4101037>.
13. Nasu, Hitoshi. 2021. "The 'Infodemic': Is International Law Ready to Combat Fake News in the Age of Information Disorder?" *The Australian Year Book of International Law Online* 39 (1): 65–77. <https://doi.org/10.1163/26660229-03901006>.
14. Nogueira da Silva, Adilton Cícero, Selediana de Souza Godinho, Analia Veronica Losada, Simon Bacon, Nora Granana, and Carolina Gomez Jimenez. 2022. "The Infodemic in a Preventively Isolated Argentina. An Analysis of Fake News about the Covid-19 Pandemic

- Debunked by Confiar." *Revista Mexicana de Opinión Pública*, no. 33 (December): 139–54. <https://doi.org/10.22201/fcpys.24484911e.2022.33.79805>.
15. Omari, Jeffrey. 2021. "Taking Aim at 'Fake News': Brazil's Legislative Agenda for Online Democracy." SSRN Scholarly Paper. Rochester, NY. <https://papers.ssrn.com/abstract=4104844>.
 16. Park, Ahran, and Kyu Ho Youm. n.d. "Fake News From a Legal Perspective: The United States and South Korea Compared" 25.
 17. Smith, Robert Brian, Mark Perry, and NuchareeNuchkoom Smith. 2021. "'Fake News' in Asean: Legislative Responses." SSRN Scholarly Paper. Rochester, NY. <https://doi.org/10.2139/ssrn.4140077>.
 18. Sperti, Angioletta. 2022. "Constitutional Courts Speak Their Voice Their Fight Against Fake News and Disinformation on Constitutional Justice." SSRN Scholarly Paper. Rochester, NY. <https://papers.ssrn.com/abstract=4027604>.
 19. "The Case of the Brazil Fake News Inquiry." n.d. Global Freedom of Expression. Accessed December 21, 2022. <https://globalfreedomofexpression.columbia.edu/cases/the-case-of-the-brazil-fake-news-inquiry/>.