



ATTORNEY GENERAL OF MISSOURI  
ANDREW BAILEY

IN THE MATTER OF:

CID No. 25-36

Meta/Facebook/Instagram – Firearms Policies

June 27, 2025

**CIVIL INVESTIGATIVE DEMAND**

TO: Meta, Inc.  
1 Meta Way  
Menlo Park, CA 94025

Facebook, Inc.  
1 Hacker Way  
Menlo Park, CA 94025  
[legal@fb.com](mailto:legal@fb.com)  
[subpoena@fb.com](mailto:subpoena@fb.com)

Instagram, Inc.  
1601 Willow Road  
Menlo Park, CA 94025

The Attorney General of the State of Missouri believes it to be in the public interest that an investigation be made to ascertain whether Meta, Inc., including Facebook, Inc. and Instagram, Inc., (“Subject”) or its agents or employees have engaged in or are engaging in any practices declared to be unlawful by § 407.020, RSMo. This investigation will inquire into, among other things, the activities and representations of Subject in connection with products and services offered in Missouri. The Attorney General has reason to believe that Subject may have used deception, fraud, false promises, misrepresentation, unfair practices, and/or the concealment, suppression, or omission of material facts within the scope of the Missouri Merchandising Practices Act.

The right to “keep and bear arms” is one of the most sacred and cherished rights guaranteed to the citizens of the State of Missouri under the Constitution of the United States. The ability of each citizen to provide for their own well-being and the protection of their families is the linchpin of liberty without which the rest of the Bill of Rights is reduced to near-meaningless parchment. If citizens are prevented from owning modern firearms, the government holds a monopoly on the use of force, and as history has demonstrated time and again, this consolidation of power inevitably leads to the violation of human rights and the trampling of individual liberty.

With this in mind, the Attorney General is compelled to open an investigation into concerning allegations that Subject has engaged in a deliberate pattern and practice to suppress the rights guaranteed to Missourians to not only own firearms and ammunition but to engage in related commerce to buy and sell the same and to speak openly about related matters (including but not limited to hunting, shooting, personal protection, commerce in firearms and accessories, and political opinions about such topics). This investigation will inquire into the alleged banning, restricting, prohibiting, delisting, down ranking, suppressing, demoting, demonetizing, or otherwise obscuring of any shared content (including any post, image, video, audio, textual statement or comment, link, message, email, iMessage, SMS, or other similar item) by any person on your platform relating to the sale, acquisition, possession, construction, maintenance, demonstration, use, or safe and effective employment of firearms, firearms accessories or ammunition or the monetizing of any information, opinion, service or expertise related to the same.

Missouri law prohibits companies from misleading consumers about the companies' products or services and the Attorney General believes that you have information, documentary material, and/or physical evidence relevant to the investigation described above. Prompt compliance with this Civil Investigative Demand is mandatory. §f 407.080, RSMo.

### **DEFINITIONS**

As used in this Civil Investigative Demand, the following definitions apply:

1. "You" and "Your" means Meta, Inc., including Facebook, Inc. and Instagram, Inc., ("Subject"); and all agents, representatives, employees, independent contractors, attorneys, and other persons, acting or purporting to act on behalf of it or its subsidiaries, parent companies, or sister companies.
2. "And" and "or" are to be construed broadly to include both the disjunctive and the conjunctive, to be equivalent to "and/or," to render these Requests as broad as possible.
3. "Client" means all customers to whom You have provided or are providing Your Services.
4. "Communication" means any expression, statement, conveyance, or dissemination of any words, thoughts, statements, ideas, or information, regardless of form, format, or kind. "Communication" includes but is not limited to oral or written communications of any kind, such as telephone conversations, discussions, meetings, notes, letters, agreements, emails or other electronic communications, text messages, facsimiles, and other forms of written or oral exchange that are recorded in any way, including video recordings, audio recordings, written notes, or otherwise. Any Communication that also falls within the definition of "Document" constitutes both a Document and a Communication for purposes of this civil investigative demand. The term "Communication" is not inclusive of communications solely by or between users of Your platform or services constituting "Shared Content" even though retained by You as a platform host in the normal course of business.
5. "Document" includes every "writing," "recording," and "photograph" as Federal Rule of Evidence 1001 defines those terms, as well as any "duplicate" of any writing, recording,

or photograph. “Document” includes, but is not limited to electronic documents, files, databases, and records, including but not limited to emails, voicemails, text messages, calendar appointments, instant messages, MMS messages, SMS messages, iMessages, computer files, spreadsheets, and metadata. The term Document includes every draft of any other material that falls within the definition of Document. The term “Document” is not inclusive of documents created solely by or shared between users of Your platform or services constituting “Shared Content” even though retained by You as a platform host in the normal course of business.

6. “Identify”, when used with respect to a person or entity, means information sufficient to allow the Attorney General to ascertain the current contact information (name, home or business address, telephone number, email), and if not a natural person, the current contact information for Your point of contact with the entity or facility Identified, as well as the relationship of that person or entity to You.
7. “Identify”, when used with respect to a fact or event, means information sufficient to allow employees of the Attorney General to ascertain the fact or event with reasonable particularity, and to identify each person believed to have knowledge with respect to the fact or event and each document that refers or relates to the fact or event.
8. “Identify”, when used with respect to a transaction, means to provide information sufficient to allow ascertainment of the banking and financial information of the sending and receiving parties, the method of payment or funds transfer, and the natural persons involved with the transfer or payment.
9. “Identify”, when used with respect to a Communication, means to state with specificity the date of the Communication; the medium of communication; the location of the Communication; the names and aliases of the persons who made the Communication; and the names and aliases of all persons who were present when the statement was made, who received the Communication, who heard the Communication, or who came to know of the content of the Communication at a later time.
10. “Person” means any natural person, corporation, proprietorship, partnership, association, firm, or entity of any kind, including such a “Person” who is a user of Your services.
11. “Relating to”, “related to”, “relate to”, and “regarding” mean to be relevant in any way to the subject matter, including, without limitation, all information that directly or indirectly contains, records, reflects, summarizes, evaluates, refers to, is pertinent to, indicates, comments upon, or discusses the subject matter; or that states the background of, or was the basis for, or that records, evaluates, comments, was referred to, relied upon, utilized, generated, transmitted, or received in arriving at any conclusion, opinion, estimate, position, decision, belief, policy, practice, course of business, course of conduct, procedure, or assertion concerning the subject matter.
12. “Shared Content” means any post, image, video, audio, textual statement or comment, link, email, text message, SMS message, iMessage, or other similar electronic communication, posted or otherwise provided to, or for the viewing of, one or more other Persons, on a

system, platform or mechanism offered or provided by You as part of your ordinary course of business.

### **INSTRUCTIONS**

1. Unless specifically stated otherwise, please restrict your search for all information and documents requested below to the period from **January 1, 2021, to the present**.
2. For all of your responses, You must identify—by Bates range, or by file names and locations—the Documents responsive to each particular request.
3. For each Document produced or answer provided, identify by number which request or requests the Document or answer responds to.
4. For requests seeking written answers, provide the answer in **boldface** in a paragraph or paragraphs directly beneath the numerical request.
5. If you have knowledge of a responsive Document or responsive information, but do not have the responsive Document or information in your possession, custody, or control, Identify the Person that you believe has that Document or information in its possession, custody, or control.
6. If You do not know the answer to a request, Identify the Person that You believe does have the responsive information.
7. Your answers to requests for information must be signed under oath by the Person providing the responsive information. This might entail separate Persons verifying responses to different requests.
8. Provide all material as quickly as possible, which may mean providing responsive material in batches, but no later than the deadline set forth below.
9. If You believe that You have responsive materials that are privileged, You must produce a privilege log that identifies each Document or communication, the basis for withholding it, and sufficient information to permit the Attorney General's Office to assess whether it is privileged.
10. The Missouri Attorney General may serve additional civil investigative demands on You.
11. Please note that under § 407.080, RSMo, certain acts done with the intent to avoid, evade, or prevent compliance in whole or in part with any civil investigative demand constitute a Class A misdemeanor, which is punishable by fines or imprisonment or both.
12. No extension of the deadline for compliance with this Civil Investigative Demand is effective unless it is reflected in a writing executed by an authorized representative of the Missouri Attorney General.

## **REQUESTS FOR INFORMATION AND DOCUMENTS**

Demand is hereby made upon you, under the authority granted by Section 407.040, RSMo, to produce in person or via mail as set forth below, the following documentary material that may be in your possession, custody and/or control, and permit the inspection and copying thereof:

1. Identify all Persons responsible for providing Documents and information responsive to this Civil Investigative Demand. For each Person identified, Identify the specific requests to which each person contributed Documents or information.
2. Produce all Documents that you Identified, referred to, used to prepare, or concern any of Your responses to any of these specific requests that are not otherwise produced.
3. If Documents or information responsive to a particular request have been lost or destroyed, state the **circumstances** under which the Documents or information were lost or destroyed, describe the lost or destroyed Documents or information to the fullest extent possible, state the specific demand to which they are responsive, and identify all Persons having knowledge of their content.
4. Produce all Documents generated by You (rather than a user of Your services) relating to the sale, acquisition, possession, construction, maintenance, demonstration, use, or safe and effective employment of firearms, firearms accessories or ammunition or the monetizing of any information, opinion, service or expertise related to the same.
5. Identify all Persons who may have knowledge of the subject matter of this investigation as set forth on page 1 above.
6. Produce all Documents which contain information regarding disparate impact that Your “spam” algorithm may have on, or has had on, any Shared Content based on it relating to the sale, acquisition, possession, construction, maintenance, demonstration, use, or safe and effective employment of firearms, firearms accessories or ammunition or the monetizing of any information, opinion, service or expertise related to the same.
7. Identify all policy changes made by You relating to the sale, acquisition, possession, construction, maintenance, demonstration, use, or safe and effective employment of firearms, firearms accessories or ammunition or the monetizing of any information, opinion, service or expertise related to the same, including the posting of any such Shared Content by a Person on Your platform.
8. Provide all Documents created or retained by You relating to the creation, development, adoption, amendment, or alteration, of any community guidelines, policy, user agreement, or term of service relating to the sale, acquisition, possession, construction, maintenance, demonstration, use, or safe and effective employment of firearms, firearms accessories or ammunition or the monetizing of any information, opinion, service or expertise related to the same, including the posting of any such related Shared Content by a Person (including but not limited to any related to Persons under the age of 18) on Your platform. Specifically provide all past and present versions of any such community guidelines, policy, user agreement, or term of service.

9. Did Subject ever or does Subject currently have a policy or practice to design Subject's algorithms to disfavor or treat in a disparate manner or have a disparate effect any Shared Content relating to the sale, acquisition, possession, construction, maintenance, demonstration, use, or safe and effective employment of firearms, firearms accessories or ammunition or the monetizing of any information, opinion, service or expertise related to the same, including the posting of any such related Shared Content by a Person on Your platform?
10. Did Subject ever or does Subject currently have reason to believe that Subject's algorithms in practice disfavor or treat in a disparate manner or have a disparate effect any Shared Content relating to the sale, acquisition, possession, construction, maintenance, demonstration, use, or safe and effective employment of firearms, firearms accessories or ammunition or the monetizing of any information, opinion, service or expertise related to the same, including the posting of any such related Shared Content by a Person on Your platform?
11. Provide all documents created or retained by You relating to the banning, restricting, prohibiting, delisting, down ranking, suppressing, demoting, demonetizing, or otherwise obscuring of any Shared Content relating to the sale, acquisition, possession, construction, maintenance, demonstration, use, or safe and effective employment of firearms, firearms accessories or ammunition or the monetizing of any information, opinion, service or expertise related to the same by a Person on Your platform.
12. Provide all documents created or retained by You relating to the banning, restricting, prohibiting, delisting, down ranking, suppressing, demoting, demonetizing, censoring or otherwise obscuring of any Shared Content by any Person relating to political content or opinion otherwise protected by the Second Amendment to the Constitution of the United States relating to firearms, firearms accessories or ammunition or the monetizing of any information, opinion, service or expertise related to the same.
13. Provide all documents created or retained by You regarding the banning, restricting, prohibiting, delisting, down ranking, suppressing, demoting, demonetizing, censoring or otherwise obscuring of banning or restricting on Your platform Shared Content relating to educational instruction or content supporting the lawful and safe use, maintenance, or transportation of firearms, firearms accessories or ammunition by any Person, including students, firearm owners or users under the age of 18, or hunters.
14. Did Subject ever or does Subject currently have a policy, oral or written, whether or not provided to users or any other Person, banning, restricting, prohibiting, delisting, down ranking, suppressing, demoting, demonetizing, censoring or otherwise obscuring, on Your platform, Shared Content relating to firearms, firearms accessories or ammunition that is different for Persons under the age of 18 than for Persons age 18 or older?
15. Provide all Documents created or retained by You regarding any age-verification policy for Persons under the age of 21, oral or written, whether or not provided to users or any other Person, relating to the ability to access Shared Content relating to firearms, firearms accessories or ammunition.

16. Provide all Documents created or retained by You regarding any policy, oral or written, whether or not provided to users or any other Person, requiring any Person to create a user account in order to access Shared Content relating to firearms, firearms accessories or ammunition.
17. Provide all Communications or Documents between Subject and the Biden Administration (specifically the Office of the President or the Vice-President of the United States), the FBI, the ATF, the Brady Campaign, the Giffords Law Center, or Everytown for Gun Safety, relating to the banning, restricting, prohibiting, delisting, down ranking, suppressing, demoting, demonetizing, censoring or otherwise obscuring of any Shared Content by any Person relating to political content or opinion otherwise protected by the Second Amendment to the Constitution of the United States relating to firearms, firearms accessories or ammunition.

Nothing in the numbered requests above shall be construed to seek Communications or Documents relating primarily to a law enforcement investigation or national security matter and provided by You to the government pursuant to a valid warrant.

As authorized by § 407.040, RSMo, the Attorney General demands that—no later than 10:00 a.m. (Central) on August 26, 2025—You produce responsive documents and information to the Missouri Attorney General’s Office. Submit the Certification of Compliance, all documents, and all responsive information to:

Todd Scott  
Senior Counsel  
Missouri Attorney General’s Office  
207 West High Street  
Jefferson City, MO 65101  
Todd.Scott@ago.mo.gov  
(573) 751-8366

/s/ 

CID No. 25-36

June 27, 2025

I certify that all documents and information required by Civil Investigative Demand No. 25-36, which is in the possession, custody, control, or knowledge of Meta, Inc., including Facebook, Inc. and Instagram, Inc., has been submitted to the Missouri Attorney General as directed.

Date

On this day, \_\_\_\_\_ personally appeared before me, a notary public in \_\_\_\_\_. I know him to be the individual who signed this document, and he acknowledged to me that he signed it for the purposes stated in it.

Date \_\_\_\_\_