



December 5, 2022

\*\*\*Electronically Submitted VIA Regulations.gov\*\*\*

Consumer Financial Protection Bureau  
1700 G St. NW  
Washington D.C. 20552

Email: [BigTechPaymentsInquiry@cfpb.gov](mailto:BigTechPaymentsInquiry@cfpb.gov)

RE: Docket No. CFPB-2021-0017 - Notice and Request for Comment Regarding the CFPB's Inquiry Into Big Tech Payment; Document Citation [86 FR 61182](#)

The National Vaccine Information Center (NVIC) welcomes the opportunity to comment on the Consumer Financial Protection Bureau's inquiry. CFPB has requested public comment on markets for consumer financial products and whether or not companies with payment platforms operate in a manner that is fair, transparent, and competitive. CFPB has specifically requested comment on the following questions.

- ***“Will these companies operate their payment platforms in a manner that interferes with fair, transparent, and competitive markets;***
- ***Will the payment platforms be truly neutral, or will they use their scale to extract rents from market participants;***
- ***What factors will these tech companies use when disqualifying or delisting an individual or business from participating on the platform?”***

CFPB further requests public comment on the following question: ***“Do the acceptable use policies for technology companies' payment platforms include provisions that can restrict access to their platforms? If so, under what circumstances can the technology companies restrict access to their platforms?”***

**About NVIC.** The National Vaccine Information Center is an educational, charitable organization (501c3) founded in 1982 by parents whose children were injured or died following DPT vaccine reactions. NVIC co-founders worked with Congress on the National Childhood Vaccine Injury Act of 1986 to secure vaccine safety informing, recording, reporting, and research provisions in that historic law. NVIC does not make vaccine use recommendations. NVIC's 40-year mission has been to prevent vaccine injuries and deaths through public education and to secure informed consent

protections in U.S. public health policies and laws.<sup>1</sup> NVIC operates four websites: NVIC.org, NVICAdvocacy.org, TheVaccineReaction.org, and MedAlerts.org.

**PayPal Blocks Donations to NVIC.** Through Network for Good beginning in 2013, PayPal was the main online financial platform processing donations from the public to NVIC. However, without warning or explanation after the close of business on December 21, 2021, Network for Good notified NVIC that PayPal was immediately suspending the processing of NVIC donations because our charity was being removed from the PayPal platform.<sup>2</sup>

PayPal's arbitrary action to abruptly remove NVIC from PayPal's online financial platform significantly harmed both NVIC's fundraising ability and good reputation as a trustworthy charity, which caused an immediate loss of donors and income through no fault of our own. Many of the recurring monthly donors, with whom NVIC staff had spent considerable time building relationships, were left unaware that their monthly donations were being blocked by PayPal. To this day, an unknown number of those donors are not aware that their previously pledged monthly donations are not reaching NVIC.

The result was that PayPal not only harmed NVIC financially but also disrupted the charity's operation by founders and directors, who were given no explanation for why NVIC was being punished by owners and operators of PayPal after a positive financial relationship with Network for Good and PayPal for nearly a decade. Although NVIC subsequently identified an alternative platform to process donations, the damage had been done.<sup>3</sup>

**PayPal Violates Neutrality & Fair Practice.** If PayPal sanctioned NVIC for engaging in the First Amendment right to freedom of thought, speech, and conscience in our efforts to fulfill our 40-year mission to prevent vaccine injuries and deaths through public education and defend the informed consent ethic, we maintain that online financial platforms should not be allowed to discriminate against and block financial transactions of law-abiding charitable organizations simply for failing to align with the ideological or political views of platform owners and operators. PayPal's action against NVIC does not constitute neutral or fair practice but is political censorship of the worst kind. There is no justification for PayPal's discrimination against a highly rated charity that has consistently advocated for civil conversation and responsible citizen action for the purpose of effecting constructive reform of public policy and law.

PayPal's abrupt refusal to process donations for NVIC raises questions about current censorship tactics used by political operatives and foreign agents,<sup>4 5 6 7</sup> elected government officials and political parties,<sup>8 9 10</sup> and companies involved in public-private business partnerships between industry and government seeking to stifle debate about U.S. public policy and law.<sup>11 12 13 14</sup> This censorship and suppression of dissent infringes on freedoms guaranteed by the U.S. Constitution including, but not limited to, free speech, which includes the freedom to examine and offer perspective and opinion about vaccine science and public health policy and law.<sup>15 16 17</sup> Failure to protect freedom of speech can lead to serious human rights abuses.<sup>18</sup>

The fact that a letter was sent to PayPal on December 15, 2021 signed by 18 Democrat members of the U.S. House of Representatives asking the President and CEO of PayPal to take action and deactivate NVIC's PayPal account, which PayPal did six days later, should be of concern to the CFPB and all Americans who value freedom of speech.<sup>19</sup>

As investigative journalist Sharyl Attkisson has observed, *"The National Vaccine Information Center (NVIC) is one of the many fact-based advocacy groups that has suffered under the heavy hand of censorship from Big Tech acting on behalf of pharmaceutical/government/corporate interests...No longer is there any doubt that vaccine industry interests and other corporate and political interests are pulling the strings so that Big Tech moves to squash scientific views, studies, scientists, and opinions that are contrary to the narrative."*<sup>20</sup>

**PayPal's Discrimination & Data Grab Facilitates Defamation & Censorship.** In 2021, PayPal announced that it would partner with the Anti-Defamation League (ADL) in refusing to allow organizations that the ADL considers to, *"support extremism and hate"* or endangers *"at risk communities."* Neither PayPal nor ADL's Center on Extremism, which will lead the program, have fully disclosed the criteria they use to de-platform organizations.<sup>21 22</sup>

The business partnership between PayPal and ADL enables PayPal to investigate any organization, which the owners and operators of PayPal deem to be *"extremist"* or a *"hate group,"* to determine whether or not the organization can utilize PayPal to collect funds. PayPal and ADL's partnership announcement made it clear that they plan to uncover and disrupt the cash flow of groups, which support *"white supremacist and anti-government organizations"* and *"spread and profit from antisemitism, Islamophobia, racism, anti-immigrant, anti-Black, anti-Hispanic and anti-Asian bigotry."* PayPal indicated that it plans to share the data it collects with other financial institutions, policy makers and law enforcement.<sup>23</sup>

ADL's CEO publicly stated:

***"We have a unique opportunity to further understand how hate spreads and develop key insights that will inform the efforts of the financial industry, law enforcement, and our communities in mitigating extremist threats."***<sup>24</sup>

**NVIC: A History of Responsible Advocacy for Participation in Government.** NVIC has never engaged in white supremacist, anti-government, antisemitism, Islamophobia, racism, anti-immigrant, anti-Black, anti-Hispanic, and anti-Asian bigotry or hate speech. There is nothing in NVIC's long and transparent public record that justifies defaming our charity by placing it in the "extremist" or "hate speech" category. Rather, NVIC has an established 40-year reputation for publishing well-referenced information; for promoting a civil, enlightened conversation about vaccination, health, and autonomy; and for

encouraging Americans to responsibly participate in government at the local, state, and federal level.<sup>25</sup>

- Over the past 40 years, NVIC co-founders and representatives have testified in Congress; served as consumer representatives on federal vaccine advisory committees, participated in public engagement projects, and submitted written and oral public comments to federal agencies on vaccine science, policy, law and ethics (1982-2022);<sup>26 27 28 29 30</sup>
- NVIC's co-founder and president served for four years as a consumer representative on the Institute of Medicine Vaccine Safety Forum and made invited presentations at vaccine safety workshops sponsored by the National Academy of Sciences. (1992-2012);<sup>31 32</sup>
- Since 1982, NVIC representatives have testified in and worked with state legislatures to secure and defend vaccine-informed consent protections in public health policies and laws;<sup>33</sup>
- Since 1982, NVIC's perspective has been included in media reports on vaccine science, policy, law, and ethics.<sup>34</sup>

**Law Abiding Citizens and Organizations Should Not Be Penalized.** By being allowed to implement exclusion policies based on whether or not individuals or organizations align with the ideological and political views of PayPal owners and operators, PayPal and other financial institutions can exert significant political influence on society by becoming agents of censorship and economic ruin for those they target. With regard to charitable organizations, those that conform with political positions taken by PayPal's owners and operators will be allowed to receive donations from the public, while legitimate charitable organizations like NVIC can be censored, discriminated against, and denied access to one of the largest online payment platforms in the world based on a difference of opinion.

For the above reasons, NVIC opposes the censorship, data collection, blocking of donations, and the disruption of cash flow caused by PayPal's discriminatory policies that penalize reputable charitable organizations for simply fulfilling their mission.

Sincerely,



Barbara Loe Fisher,  
Co-founder & President

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<sup>1</sup> National Vaccine Information Center. [About National Vaccine Information Center](#). Also: [NVIC's Mission, Work & Vision for the Future](#). 2022.

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- <sup>2</sup> Wrangham T. [PayPal Stops Processing NVIC Donations](#). *National Vaccine Information Center*. Dec. 24, 2021.
- <sup>3</sup> Attkisson S. [CENSORED \(but victorious\): National Vaccine Information Center](#). *Sharyl Attkisson*. Jan. 3, 2022.
- <sup>4</sup> Ross C. [British Group Tied to Labour Party is Trying to Take Down American Conservative Websites](#). *Daily Caller* June 17, 2020.
- <sup>5</sup> Ahmed I. [Statement for the Record for House Select Subcommittee on the Coronavirus Crisis](#). *Center for Countering Digital Hate (CCDH)*. June 1, 2021.
- <sup>6</sup> House Subcommittee on Consumer Protection and Commerce Hearing: Holding Big Tech Accountable to Build a Safer Internet. [Testimony of Imran Ahmed](#) (page 50). Dec, 9, 2021.
- <sup>7</sup> Wikispooks. [Center for Countering Digital Hate \(CCDH\)](#). Jan. 11, 2022.
- <sup>8</sup> Bond S. [Democrats Want to Hold Social Media Companies Responsible for Health Misinformation](#). *NPR* July 22, 2021.
- <sup>9</sup> Auchincloss J. RELEASE: [Auchincloss Leads Democrats in Letter to Stop Vaccine Disinformation Profits: Letter to PayPal to Ban users who disseminate disinformation](#). Press Release Dec. 15, 2021.
- <sup>10</sup> Younes J. [Unchecked by Courts, Government Censorship of Social Media Platforms Will Prove Fatal to Free Speech in Digital Age](#). *The Daily Signal* June 1, 2022.
- <sup>11</sup> Attkisson S. [CENSORED: National Vaccine Information Center](#). Mar. 8, 2021.
- <sup>12</sup> Shir-Raz Y, Elisha E, Martin B et al. [Censorship and Suppression of Covid-19 Heterodoxy: Tactics and Counter-Tactics](#). *Minerva* Nov. 1, 2022.
- <sup>13</sup> Neera V. [Patents, Pandemics, and the Private Sector: The Battle Over Public Health Norms During COVID-19](#). *Journal of Public & International Affairs* May 20, 2022.
- <sup>14</sup> Deruelle F. [The pharmaceutical industry is dangerous to health. Further proof with COVID-19](#). *Surg Neurol Int* 2022; 13: 475.
- <sup>15</sup> Fisher BL. [Vaccination and Censorship: The Truth Will Set Us Free](#). *National Vaccine Information Center* Jan. 26, 2021.
- <sup>16</sup> Gordon JS. [The New Censorship](#). *City Journal* July 23, 2021.
- <sup>17</sup> Bardosh K, de Figueiredo A, Gur-Arie R et al. [The unintended consequences of COVID-19 vaccine policy: why mandates, passports and restrictions may cause more harm than good](#). *BMJ Global Health* 2022; 7.
- <sup>18</sup> Human Rights Watch. [Covid-19 Triggers Wave of Free Speech Abuse](#). Feb. 11, 2021.
- <sup>19</sup> Auchincloss J. RELEASE: [Auchincloss Leads Democrats in Letter to Stop Vaccine Disinformation Profits: Letter to PayPal to Ban users who disseminate disinformation](#). Press Release Dec. 15, 2021.
- <sup>20</sup> Attkisson S. [CENSORED \(but victorious\): National Vaccine Information Center](#). Jan. 3, 2022.
- <sup>21</sup> Tobin, J.S. [Forget using PayPal if your views run afoul of this left-wing group](#). *New York Post*. Jul. 29, 2021.
- <sup>22</sup> Irrera, A. [PayPal to research transactions that fund hate groups, extremists](#). *Reuters*. Jul. 26, 2021.
- <sup>23</sup> Fleetwood, S. [PayPal Is Conspiring With The Anti-Defamation League To Decide Which Political Views Are Acceptable In Finance](#). *The Federalist*. July 26, 2021.
- <sup>24</sup> Irrera, A. [PayPal to research transactions that fund hate groups, extremists](#). *Reuters*. Jul. 26, 2021.
- <sup>25</sup> National Vaccine Information Center. [NVIC Core Values & Principles](#). 2022.
- <sup>26</sup> Fisher BL. [Compensating Vaccine Injuries: Are Reforms Needed?](#) House Subcommittee on Criminal Justice, Drug Policy and Human Resources of Government Reform Committee. Sept. 28, 1999.
- <sup>27</sup> Fisher BL. [Biography](#). 2022.
- <sup>28</sup> Pebsworth V. [Biography](#). 2022.
- <sup>29</sup> National Vaccine Information Center. [NVIC Statements Submitted to Federal Vaccine Advisory Committees](#). Oct. 1, 2022.
- <sup>30</sup> National Vaccine Information Center. [NVIC Public Comments Submitted to Federal Agencies](#). June 10, 2022.
- <sup>31</sup> Fisher BL. [Assessment of Studies of Health Outcomes Related to the Recommended Childhood Immunization Schedule: A Public Perspective](#). *Institute of Medicine* Feb. 9, 2012.
- <sup>32</sup> National Vaccine Information Center. [Institute of Medicine \(IOM\) Vaccine Safety Reports: NVIC Statements & Background. \(1995-2013\)](#).
- <sup>33</sup> National Vaccine Information Center. [Annual 2022 State Vaccine Legislation Report](#). Nov. 17, 2022.
- <sup>34</sup> National Vaccine Information Center. [News & Media Archive \(Selected media coverage 1986-2022\)](#).