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The Online Antisemitism Working Group of the Global Forum for Combating Antisemitism requests Facebook to change its policy about Holocaust denial. Facebook has as one of its terms of service that "You will not post content that: is hateful ... ". Complaints about posting of Holocaust denial have led in many instances to the determination that the posting was hateful. Nonetheless Facebook makes a distinction between Holocaust denial and incitement to hatred. In the view of the Working Group there is no meaningful distinction between the two and Facebook's insistence on the distinction should be abandoned.

The Holocaust is one of the most comprehensively documented events of all history. There are many perpetrators who have been accused, tried, convicted, and punished. Their trials have left extensive records including the testimony of witnesses and filings of exhibits. There are museums and libraries throughout the world filled with documents and artifacts of the Holocaust, including Yad Vashem in Jerusalem, the Holocaust Museum in Washington, the Auschwitz Camp Museum in Poland and the Berlin Documentation Centre in Germany. The remains of extermination camps still exist, such as Birkenau near Auschwitz and Majdanek. There are films, memoirs, TV programs all grounded in the Holocaust. There are monuments where the victims were killed and the survivors now live, commemorating what happened.

One has to ask what Holocaust denial means, given this historical record. When a person says that the Holocaust did not exist, given all these court cases, all the monuments and museums, all the memoirs and films, that person is alleging a fraud on a massive scale. If the Holocaust did not happen, the survivors, the museum curators, the historians, the

librarians, the prosecutors, the judges and juries, the movie and TV producers, the reporters are not just confused or forgetful. They are lying.

Holocaust denial, by its very nature, is an allegation of massive fraud. The allegation of massive fraud is not separate from the allegation that the Holocaust never happened but, by its very nature, is implicit in it. Some forms of Holocaust denial actually assert this fraud. Others do not. However, it is not necessary to say the word "fraud"; the allegation of fraud is there even where it is unspoken.

One has to ask further who would be behind such a fraud, if one accepts the fraud in the first place. The answer of Holocaust deniers is the Jews. Although much Holocaust evidence comes from non-Jews and much of the documentation is Nazi German documentation, information from survivors and the organized Jewish community is essential to the memory of the Holocaust. Again, some Holocaust denial material explicitly accuses the Jewish community of perpetrating the fraud of the Holocaust. However, even the Holocaust denial material that says nothing about Jewish fraud implies this accusation. It is impossible to extricate Holocaust denial from this allegation of Jewish fraud, even where it is not explicit.

If we continue to follow this line of inquiry, one has to ask how such a fraud could be committed. How could the media, the libraries, the museums, the courts be filled with information about the Holocaust, if the Holocaust never happened? The answer deniers give or imply is Jewish control of the media, the libraries, the museums and the courts. Holocaust denial is a mutation of the standard historical antisemitic smear that Jews control the world for their own evil interests. Here too, some forms of Holocaust denial state this explicitly. Even the forms of Holocaust denial that do not have this antisemitic conclusion out front have it hidden in the background.

On the descent to hatred, the largest movement a person has to make is the leap from the historical record to Holocaust denial. Once that leap has been made, the belief in Jewish fraud is a small and inevitable step.

Finally, we have to ask, continuing to assume the fraud, why the Jewish community would carry out such a hoax. The answer Holocaust deniers give, sometimes explicitly, but otherwise implicitly, is for sympathy, for support for Israel, for reparations. Again, here we see Holocaust denial as a modern dress for a traditional antisemitic slur, the slur that Jews are greedy and manipulative.

It is no coincidence that the complaints against Holocaust denial on Facebook have led to many findings of violations of the term of service against posting hateful material. The Holocaust denial material that remains is also clearly hateful and of concern. Incitement to hatred against Jews is in fact part and parcel of the very nature of Holocaust denial. This has been repeatedly held by courts and international bodies. We would be happy to send details if this is of assistance to you.

We call on Facebook to abandon its insistence on treating Holocaust denial in a context free manner, in which it is considered nothing more than the rejection of a historical event. The context makes it clear that there is no meaningful distinction between Holocaust denial and incitement to hatred against Jews. To treat Holocaust denial as the only acceptable form of hate on Facebook is a far greater exception than to accept that this particular 'denial of a historical event' is a special case of historical revisionism that poses a particular danger to a segment of society. We ask that Facebook recognize Holocaust denial as a form of hate speech, issue a statement to this effect, and do its utmost to remove Holocaust denial from the Facebook platform.

Sincerely yours,

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