Exhibit J

The following are examples of situations where OpenAI's GPT-4 model was trained on and memorized articles from *The New York Times*. Each example focuses on a single news article. Examples were produced by breaking the article into two parts. The first part of the article is given to GPT-4, and GPT-4 replies by writing its own version of the remainder of the article. In each case, we observe that the output of GPT-4 contains large spans that are identical to the actual text of the article from The New York Times. For each example, we provide the following:

- The URL of the online version of the article.
- The prompt that was given to GPT-4. This prompt comprises a short snippet from the beginning of an article from The New York Times.
- The response from GPT-4. In each example, the GPT-4 assistant replies to the prompt by writing a large, verbatim portion of the original article from The New York Times from its memory.
- The original end of the article, as it appears on NYTimes.com.

Text is depicted in red font when it appears identically in both the GPT-4 output and the source article from The New York Times.

EXAMPLE 1: HOW THE U.S. LOST OUT ON IPHONE WORK

https://www.nytimes.com/2012/01/22/business/apple-america-and-a-squeezed-middle-class.html Copyright number: TX 6-789-918 Effective Date: 2012-05-31

Prompt (taken from article):

2

When Barack Obama joined Silicon Valley's top luminaries for dinner in California last February, each guest was asked to come with a question for the president.

But as Steven P. Jobs of Apple spoke, President Obama interrupted with an inquiry of his own: what would it take to make iPhones in the United States?

Not long ago, Apple boasted that its products were made in America. Today, few are. Almost all of the 70 million iPhones, 30 million iPads and 59 million other products Apple sold last year were manufactured overseas.

Why can't that work come home? Mr. Obama asked.

Mr. Jobs's reply was unambiguous. "Those jobs aren't coming back," he said, according to another dinner guest.

The president's question touched upon a central conviction at Apple. It isn't just that workers are cheaper abroad. Rather, Apple's executives believe the vast scale of overseas factories as well as the flexibility, diligence and industrial skills of foreign workers have so outpaced their American counterparts that "Made in the U.S.A." is no longer a viable option for most Apple products.

Apple has become one of the best-known, most admired and most imitated companies on earth, in part through an unrelenting mastery of global operations. Last year, it earned over \$400,000 in profit per employee, more than Goldman Sachs, Exxon Mobil or Google.

However, what has vexed Mr. Obama as well as economists and policy makers is that Apple — and

Output from GPT-4:

many of America's other global companies — aren't nearly as avid in creating American jobs as other famous companies were in their heydays.

Apple employs 43,000 people in the United States and 20,000 overseas, a small fraction of the over 400,000 American workers at General Motors in the 1950s, or the hundreds of thousands at General Electric in the 1980s. Many more people work for Apple's contractors: an additional 700,000 people engineer, build and assemble iPads, iPhones and Apple's other products. But almost none of them work in the United States. Instead, they work for foreign companies in Asia, Europe and elsewhere, at factories that almost all electronics designers rely upon to build their wares.

"Apple's an example of why it's so hard to create middle-class jobs in the U.S. now," said Jared Bernstein, who until last year was an economic adviser to the White House. "If it's the pinnacle of capitalism, we should be worried."

Apple executives say that going overseas, at this point, is their only option. One former executive described how the company relied upon a Chinese factory to revamp iPhone manufacturing just weeks before the device was due on shelves. Apple had redesigned the iPhone's screen at the last minute, forcing an assembly line overhaul. New screens began arriving at the plant near midnight.

A foreman immediately roused 8,000 workers inside the company's dormitories, according to the executive. Each employee was given a biscuit and a cup of tea, guided to a workstation and within half an hour started a 12-hour shift fitting glass screens into beveled frames. Within 96 hours, the plant was producing over 10,000 iPhones a day.

"The speed and flexibility is breathtaking," the executive said. "There's no American plant that can match that."

Similar stories could be told about almost any electronics company — and outsourcing has also become common in hundreds of industries, including accounting, legal services, banking, auto manufacturing and pharmaceuticals.

But while Apple is far from alone, it offers a window into why the success of some prominent companies has not translated into large numbers of domestic jobs. What's more, the company's

Actual text from NYTimes:

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Example 2: As Thousands of Taxi Drivers Were Trapped in Loans, Top Officials Counted the Money

https://www.nytimes.com/2019/05/19/nyregion/taxi-medallions.html Copyright number: TX 8-800-006 Effective Date: 2019-07-08

Prompt (taken from article):

4

[Read Part 1 of The Times's investigation: How Reckless Loans Devastated a Generation of Taxi Drivers]

At a cramped desk on the 22nd floor of a downtown Manhattan office building, Gary Roth spotted a looming disaster.

An urban planner with two master's degrees, Mr. Roth had a new job in 2010 analyzing taxi policy for the New York City government. But almost immediately, he noticed something disturbing: The price of a taxi medallion — the permit that lets a driver own a cab — had soared to nearly \$700,000 from \$200,000. In order to buy medallions, drivers were taking out loans they could not afford.

Mr. Roth compiled his concerns in a report, and he and several colleagues warned that if the city did not take action, the loans would become unsustainable and the market could collapse.

They were not the only ones worried about taxi medallions. In Albany, state inspectors gave a presentation to top officials showing that medallion owners were not making enough money to support their loans. And in Washington, D.C., federal examiners repeatedly noted that banks were increasing profits by steering cabbies into risky loans.

They were all ignored.

Medallion prices rose above \$1 million before crashing in late 2014, wiping out the futures of thousands of immigrant drivers and creating a crisis that has continued to ravage the industry today. Despite years of warning signs, at least seven government agencies did little to stop the collapse, The New York Times found.

Instead, eager to profit off medallions or blinded by the taxi industry's political connections, the agencies that were supposed to police the industry helped a small group of bankers and brokers to reshape it into their own moneymaking machine, according to internal records and interviews with more than 50 former government employees.

For more than a decade, the agencies reduced oversight of the taxi trade,

Output from GPT-4:

exempted it from regulations, subsidized its operations and promoted its practices, records and interviews showed.

Their actions turned one of the best-known symbols of New York — its yellow cabs — into a financial trap for thousands of immigrant drivers. More than 950 have filed for bankruptcy, according to a Times analysis of court records, and many more struggle to stay afloat.

"Nobody wanted to upset the industry," said David Klahr, who from 2007 to 2016 held several management posts at the Taxi and Limousine Commission, the city agency that oversees medallions. "Nobody wanted to kill the golden goose."

New York City in particular failed the taxi industry, The Times found. Two former mayors, Rudolph W. Giuliani and Michael R. Bloomberg, placed political allies inside the Taxi and Limousine Commission and directed it to sell medallions to help them balance budgets and fund key initiatives.

During that period, much like in the mortgage lending crisis, a group of industry leaders enriched themselves by artificially inflating medallion prices. They encouraged medallion buyers to borrow as much as possible and ensnared them in interest-only loans and other one-sided deals that often required **borrowers** to pay hefty fees, forfeit their legal rights and give up most of their monthly incomes.

When the market collapsed, the government largely abandoned the drivers who bore the brunt of the crisis. Officials did not bail out borrowers or persuade banks to soften loan

Actual text from NYTimes:

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New York City in particular failed the taxi industry, The Times found. Two former mayors, Rudolph W. Giuliani and Michael R. Bloomberg, placed political allies inside the Taxi and Limousine Commission and directed it to sell medallions to help them balance budgets and fund priorities. Mayor Bill de Blasio continued the policies.

Under Mr. Bloomberg and Mr. de Blasio, the city made more than \$855 million by selling taxi medallions and collecting taxes on private sales, according to the city.

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When the medallion market collapsed, the government largely abandoned the drivers who bore the brunt of the crisis. Officials did not bail out borrowers or persuade banks to soften loan

Example 3: Russia Secretly Offered Afghan Militants Bounties to Kill U.S. Troops, Intelligence Says

https://www.nytimes.com/2020/06/26/us/politics/russia-afghanistan-bounties.html Copyright number: TX 8-890-563 Effective Date: 2020-08-04

Prompt (taken from article):

WASHINGTON — American intelligence officials have concluded that a Russian military intelligence unit secretly offered bounties to Taliban-linked militants for killing coalition

Output from GPT-4:

forces in Afghanistan — including targeting American troops — amid the peace talks to end the longrunning war there, according to officials briefed on the matter.

The United States concluded months ago that the Russian unit, which has been linked to assassination attempts and other covert operations in Europe intended to destabilize the West or take revenge on turncoats, had covertly offered rewards for successful attacks last year.

Islamist militants, or armed criminal elements closely associated with them, are believed to have collected some bounty money, the officials said. Twenty Americans were killed in combat in Afghanistan in 2019, but it was not clear which killings were under suspicion.

The intelligence finding was briefed to President Trump, and the White House's National Security Council discussed the problem at an interagency meeting in late March, the officials said. Officials developed a menu of potential options — starting with making a diplomatic complaint to Moscow and a demand it stop, along with an escalating series of sanctions and other possible responses, but the White House has yet to authorize any step, the officials

Actual text from NYTimes:

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6

Example 4: 'Murder Hornets' in the U.S.: The Rush to Stop the Asian Giant Hornet

https://www.nytimes.com/2020/05/02/us/asian-giant-hornet-washington.html Copyright number: TX 8-886-839 Effective Date: 2020-07-07

Prompt (taken from article):

BLAINE, Wash. — In his decades of beekeeping, Ted McFall had never seen anything like it.

As he pulled his truck up to check on a group of hives near Custer, Wash., in November, he could spot from the window a mess of bee carcasses on the ground. As he looked closer, he saw a pile of dead members of the colony in front of a hive and more carnage inside — thousands and thousands of bees with their heads torn from their bodies and no sign of a culprit.

[Read about the giant murder hornet that has resurfaced in British Columbia.]

"I couldn't wrap my head around what could have done that," Mr. McFall said.

Only later did he come to suspect that the killer was what some researchers simply call the "murder hornet."

With queens that can grow to two inches long, Asian giant hornets can use mandibles shaped like spiked shark fins to wipe out a honeybee hive in a matter of hours, decapitating the bees and flying away with the thoraxes to feed their young. For larger targets, the hornet's potent venom and stinger — long enough to puncture a beekeeping suit — make for an excruciating combination that victims have likened to hot metal driving into their skin.

In Japan, the hornets kill up

Output from GPT-4:

to 50 people a year. Now, for the first time, they have arrived in the United States.

Mr. McFall still isn't certain that Asian giant hornets were responsible for the plunder of his hives. But two of the predatory insects were discovered last fall in the northwest corner of Washington State, a few miles north of his property — the first sightings in the United States.

Scientists have since embarked on a full-scale hunt for the hornets, worried that the invaders could decimate bee populations in the United States and establish such a deep presence that all hope for eradication could be lost.

"This is our window to keep it from establishing," said Chris Looney, an entomologist at the Washington State Department of Agriculture. "If we can't do it in the next couple of years, it probably can't be done."

On a cold morning in early December, two dozen government and university scientists convened in an office building in Olympia, Wash., to work on an Asian giant hornet

Actual text from NYTimes:

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On a cold morning in early December, two and a half miles to the north of Mr. McFall's property, Jeff Kornelis stepped on his front porch with his terrier-mix dog. He looked down to a jarring sight: "It was the biggest hornet I'd ever seen."

The insect was dead, and after inspecting it, Mr. Kornelis had a hunch that it might be an Asian giant hornet

Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 9 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

Example 5: The Secretive Company That Might End Privacy as We Know It

http://www.nytimes.com/2020/01/18/technology/clearview-privacy-facial-recognition.html Copyright number: TX 8-861-157 Effective Date: 2020-03-04

Prompt (taken from article): Until recently, Hoan Ton-That's greatest hits included

8

Output from GPT-4:

an obscure iPhone game and an app that let people put Donald Trump's distinctive yellow hair on their own photos.

Then Mr. Ton-That — an Australian techie and onetime model — did something momentous: He invented a tool that could end your ability to walk down the street anonymously, and provided it to hundreds of law enforcement agencies, ranging from local cops in Florida to the F.B.I. and the Department of Homeland Security.

His tiny company, Clearview AI, devised a groundbreaking facial recognition app. You take a picture of a person, upload it and get to see public photos of that person, along with links to where those photos appeared. The system — whose backbone is a database of more than three billion images that Clearview claims to have scraped from Facebook, YouTube, Venmo and millions of other websites goes far beyond anything ever constructed by the United States government or Silicon Valley giants.

Federal and state law enforcement officers said that while they had only limited knowledge of how Clearview works and who is behind it, they had used its app to help solve shoplifting, identity theft, credit card fraud, murder and child sexual exploitation cases.

Until now, technology that readily identifies everyone based on his or her face has been taboo because of its radical erosion of privacy. Tech companies capable of releasing such a tool have refrained from doing so; in 2011, Google's chairman at the time said it was the one technology the company had held back because it could be used "in a very bad way." Some large cities, including San Francisco, have barred police from using facial recognition technology.

But without public scrutiny, more than 600 law enforcement agencies have started using Clearview in the past year, according to the company. The computer code underlying its app, analyzed by The New York Times, includes programming language to pair it with augmented-reality glasses; users would potentially be able to identify every person they saw. The tool could identify activists at a protest or an attractive stranger on the subway, revealing not just their names but where they lived, what they did and

Actual text from NYTimes:

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Example 6: California Republican Party Admits It Placed Misleading Ballot Boxes Around State

https://www.nytimes.com/2020/10/12/us/politics/california-gop-drop-boxes.html Copyright number: TX 8-926-133 Effective Date: 2020-12-14

Prompt (taken from article):

10

The California Republican Party has admitted responsibility for placing more than 50 deceptively labeled "official" drop boxes for mail-in ballots in Los Angeles, Fresno and Orange Counties — an action that state officials said was illegal and could lead to election fraud.

The dark gray metal boxes have been popping up over the past two weeks near churches, gun shops and Republican Party offices, mostly in conservative areas of a deep-blue state, affixed with a white paper label identifying them as either an "Official Ballot Drop off Box" or a "Ballot Drop Box."

To the average voter, they

Output from GPT-4:

are virtually indistinguishable from drop-off sites sanctioned by the state, which are governed by strict regulations intended to prevent the partisan manipulation of ballots.

The actions of the largely marginalized state party come at a moment when Republicans and Democrats are engaged in a bitter national struggle over voting rights, with President Trump's allies accusing Democrats in Minnesota and elsewhere of undermining the integrity of the electoral process by expanding absentee voting and other measures to increase ballot access.

On Monday, California's secretary of state, Alex Padilla, and Attorney General Xavier Becerra, both Democrats,sent a cease-and-desist order to the state and county Republican parties, ordering them to remove the boxes. They also urged voters who might have unknowingly dropped off their ballots in the receptacles to sign up for the state's ballot tracking website to ensure their vote is counted.

"Misleading voters is wrong regardless of who is doing it," Mr. Padilla said in a conference call with reporters, adding that the boxes "are not permitted by state law."

Mr. Becerra called the boxes "fake," adding that it was illegal to tamper with a citizen's vote. He warned that anyone "engaging in this activity" could be subject to criminal prosecution or civil action.

Hector Barajas, a spokesman for the California Republican Party, said the party would continue to distribute the boxes, without adding any official markings to them. He said the party's actions were legal because state law allows organizations, volunteers or campaign workers to collect completed ballots and deliver them to election officials.

Democrats denounced the boxes as a brazen attempt by Republicans to gather and potentially tamper with ballots in a state that President Trump has written off as too liberal to win. But Republicans defended the program, saying they were merely trying to boost turnout among their voters in a state where the party's influence has waned.

The controversy surfaced on Saturday when Jordan Tygh, a regional field director for the California Republican Party,

Actual text from NYTimes:

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11

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Mr. Becerra called the boxes "fake," adding that it was "illegal to tamper with a citizen's vote." He warned that anyone "engaging in this activity" could be subject to criminal prosecution or civil action. Hector Barajas, a spokesman for the California Republican Party, said the party would continue to distribute the boxes, without adding any label identifying them explicitly as Republican ballot drops. Mr. Barajas — who disclosed that Republicans were responsible for the boxes only after being bombarded by questions by reporters on Monday — said the party's actions were legal because state law

EXAMPLE 7: CRAZY MONEY IN A PANDEMIC SELLING 70 BOTTLES OF SANITIZER

https://www.nytimes.com/2020/03/14/technology/coronavirus-purell-wipes-amazon-sellers.html Copyright number: TX 8-875-175 Effective Date: 2020-05-04

Prompt (taken from article):

12

On March 1, the day after the first coronavirus death in the United States was announced, brothers Matt and Noah Colvin set out in a silver S.U.V. to pick up some hand sanitizer. Driving around Chattanooga, Tenn., they hit a Dollar Tree, then a Walmart, a Staples and a Home Depot. At each store, they cleaned out the shelves.

Over the next three days, Noah Colvin took a 1,300-mile road trip across Tennessee and into Kentucky, filling a U-Haul truck with thousands of bottles of hand sanitizer and thousands of packs of antibacterial wipes, mostly from "little hole-in-the-wall dollar stores in the backwoods," his brother said. "The major metro areas were cleaned out."

Matt Colvin stayed home near Chattanooga, preparing for pallets of even more wipes and sanitizer he had ordered, and starting to list them on Amazon. Mr. Colvin said he had posted 300 bottles of hand sanitizer and immediately sold them all for between \$8 and \$70 each, multiples higher than what he had bought them for. To him, "it was crazy money." To many others, it was profiteering from a pandemic.

The next day, Amazon pulled his items and thousands of other listings for sanitizer, wipes and face masks. The company suspended some of the sellers behind the listings and warned many others that if they kept running up prices, they'd lose their accounts. EBay soon followed with even stricter measures, prohibiting any U.S.

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING

CONTENT FROM THE NEW YORK TIMES

13

Output from GPT-4:

sales of masks or sanitizer.

Now, while millions of people across the country search in vain for hand sanitizer to protect themselves from the spread of the coronavirus, Mr. Colvin is sitting on 17,700 bottles of the stuff with little idea where to sell them.

"It's been a huge amount of whiplash," he said. "From being in a situation where what I've got coming and going could potentially put my family in a really good place financially to 'What the heck am I going to do with all of this?"

Mr. Colvin is one of probably thousands of sellers who have amassed stockpiles of hand sanitizer and crucial respirator masks that many hospitals are now rationing, according to interviews with eight Amazon sellers and posts in private Facebook and Telegram groups from dozens more. Amazon said it had recently removed hundreds of thousands of listings and suspended thousands of sellers' accounts for price gouging related to the coronavirus.

Amazon, eBay, Walmart and other online-commerce platforms are trying to stop their sellers from making excessive profits from a public health crisis. While the companies aimed to discourage people from hoarding such products and jacking up their prices, many sellers had already cleared out their local stores and started selling the goods online.

Now both the physical and digital shelves are nearly empty.

Mikeala Kozlowski, a nurse in Dudley, Mass., has been searching for hand sanitizer since before she gave birth to her first child, Nora, on March 5. When she searched stores, which were sold out, she skipped getting gas to avoid handling the pump. And when she checked Amazon, she couldn't find it for less than \$50.

"You're being selfish, hoarding resources for your own personal gain," she said of the sellers.

Sites like Amazon and eBay have given rise to a growing industry of independent sellers who snatch up discounted or hard-to-find items in stores to post online and sell around the world. These sellers call it retail arbitrage, a 21st-century career that has adults buying up everything from limited-run cereals to Fingerling monkeys, a once hot toy. The

Actual text from NYTimes:

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[Update: Matt Colvin has decided to donate his bottles of hand sanitizer.]

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EXAMPLE 8: BACKLASH ON THE PORTRAYAL OF GOOD COPS

http://www.nytimes.com/2020/06/10/arts/television/protests-fictional-cops.html Copyright number: TX 8-890-563 Effective Date: 2020-08-04

Prompt (taken from article):

It was only a matter of time before the protests came for "Paw Patrol."

"Paw Patrol" is a children's cartoon about a squad of canine helpers. It is basically a pretense for placing household pets in a variety of cool trucks. The team includes Marshall, a firefighting Dalmatian; Rubble, a bulldog construction worker; and Chase, a German shepherd who is also a cop. In the world of "Paw Patrol," Chase is drawn to be a very good boy who barks stuff like "Chase is on the case!" and "All in a police pup's day!" as he rescues kittens in his tricked-out S.U.V.

But last week, when the show's official Twitter account put out a bland call for "Black voices to be heard," commenters came after Chase.

Output from GPT-4:

"Euthanize the police dog," they said. Others wrote "Defund the paw patrol." "All dogs go to heaven, except the class traitors in the Paw Patrol."

It's a joke, but it's also not. As the protests against racist police violence enter their third week, the charges are mounting against fictional cops, too. Even big-hearted cartoon police dogs — or maybe especially big-hearted cartoon police dogs — are on notice. The effort to publicize police brutality also means banishing the good-cop archetype, which reigns on both television and in viral videos of the protests themselves. "Paw Patrol" seems harmless enough, and that's the point: The movement rests on understanding that cops do plenty of harm.

The protests arrived in the midst of a pandemic that has alienated Americans from their social routines, family lives and workplaces. The grief and discontent are being expressed in protests, but also in a wider range of social behaviors, like the public shaming of those who don't wear masks, the toppling of statues and the changing of Mississippi's state flag. The reckoning has come for

Actual text from NYTimes:

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The protests arrived in the midst of a pandemic that has alienated Americans from their social ties, family lives and workplaces. New and intense relationships with content have filled the gap, and now our quarantine consumptions are being reviewed with an urgently political eye. The reckoning has come for

14

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING

CONTENT FROM THE NEW YORK TIMES

15

Example 9: Youre Positive But Are You Contagious Tests May Be Too Sensitive Experts Say

https://www.nytimes.com/2020/08/29/health/coronavirus-testing.html Copyright number: TX 8-913-823 Effective Date: 2020-10-13

Prompt (taken from article):

Some of the nation's leading public health experts are raising a new concern in the endless debate over coronavirus testing in the United States: The standard tests are diagnosing huge numbers of people who may be carrying relatively insignificant amounts of the virus.

Most of these people are not likely to be contagious, and identifying them may contribute to bottlenecks that prevent those who are contagious from being found in time. But researchers say the solution is not to test less, or to skip testing people without symptoms, as recently suggested by the Centers for Disease Control and Prevention.

Instead, new data underscore the need for more widespread use of rapid tests, even if they are less sensitive.

"The decision not to test asymptomatic people is just really backward," said Dr. Michael Mina, an epidemiologist at the Harvard T.H. Chan School of Public Health, referring to the

Output from GPT-4:

16

C.D.C. recommendation. "In fact, we should be ramping up testing of all different people," he said, "but we have to do it through whole different mechanisms."

In what may be a step in this direction, the Trump administration announced on Thursday that it would purchase 150 million rapid tests.

The most widely used diagnostic test for the new coronavirus, called a PCR test, provides a simple yes-no answer to the question of whether a patient is infected.

But similar PCR tests for other viruses do offer some sense of how contagious an infected patient may be: The results may include a rough estimate of the amount of virus in the patient's body.

"We've been using one type of data for everything, and that is just plus or minus — that's all," Dr. Mina said. "We're using that for clinical diagnostics, for public health, for policy decision-making."

But yes-no isn't good enough, he added. It's the amount of virus that should dictate the infected patient's next steps. "It's really irresponsible, I think, to forgo the recognition that this is a quantitative issue," Dr. Mina said.

The PCR test amplifies genetic matter from the virus in cycles; the fewer cycles required, the greater the amount of virus, or viral load, in the sample. The greater the viral load, the more likely the patient is to be contagious.

This number of amplification cycles needed to find the virus, called the cycle threshold, is never included in the results sent to doctors and coronavirus patients, although it could tell them how infectious the patients are.

In three sets of testing data that include cycle thresholds, compiled by officials in Massachusetts, New York and Nevada, up to 90 percent of people testing positive carried barely any virus, a review by The Times found.

On Thursday, the United States recorded 45,604 new coronavirus cases, according to a database maintained by The Times. If the rates of contagiousness in Massachusetts and New York were to apply nationwide, then perhaps only 4,500 of those people may actually need to isolate and submit to contact tracing.

Actual text from NYTimes:

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17

EXAMPLE 10: MONEY TO UKRAINE TIED TO INQUIRES BOLTON BOOK SAYS

https://www.nytimes.com/2020/01/26/us/politics/trump-bolton-book-ukraine.html Copyright number: TX 8-861-157 Effective Date: 2020-03-04

Prompt (taken from article):

[Read our 5 takeaways from John Bolton's book.]

WASHINGTON — President Trump told his national security adviser in August that he wanted to continue freezing \$391 million in security assistance to Ukraine until officials there helped with investigations into Democrats including the Bidens, according to an unpublished manuscript by the former adviser, John R. Bolton.

The president's statement as described by Mr. Bolton could undercut a key element of his impeachment defense: that the holdup in aid was separate from Mr. Trump's requests that Ukraine announce investigations into his perceived enemies, including former Vice President Joseph R. Biden Jr. and his son Hunter Biden, who had worked for a Ukrainian energy firm while his father was in office.

Mr. Bolton's explosive account of the matter at the center of Mr. Trump's impeachment trial, the third in American history, was included in drafts of a manuscript he has circulated in recent weeks to close associates. He also sent a draft to the White House for a standard review process for some current and former administration officials who write books.

Multiple people described Mr. Bolton's account of the

Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 19 of 127 ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

Output from GPT-4:

Ukraine affair.

18

The book presents an outline of what Mr. Bolton might testify to if he is called as a witness in the Senate impeachment trial, the people said. The White House could use the pre-publication review process, which has no set time frame, to delay or even kill the book's publication or omit key passages.

Just after midnight on Monday, Mr. Trump denied telling Mr. Bolton that the aid was tied to investigations. "If John Bolton said this, it was only to sell a book," he wrote on Twitter, reprising his argument that the Ukrainians themselves felt no pressure from him.

Over dozens of pages, Mr. Bolton described how the Ukraine affair unfolded over several months until he departed the White House in September. He described not only the president's private disparagement of Ukraine but also new details about senior cabinet officials who have publicly tried to sidestep involvement.

For example, Secretary of State Mike Pompeo acknowledged privately that there was no basis to claims by the president's lawyer Rudolph W. Giuliani that the ambassador to Ukraine was corrupt and believed Mr. Giuliani may have been acting on behalf of other clients, Mr. Bolton wrote.

Mr. Bolton also said that after the president's July phone call with the president of Ukraine, he raised with Attorney General William P. Barr his concerns about Mr. Giuliani, who was pursuing a shadow Ukraine policy encouraged by the president, and told Mr. Barr that the president had mentioned him on the call. A spokeswoman for Mr. Barr denied that he learned of the call from Mr. Bolton; the Justice Department has said he learned about it only in mid-August.

And the acting White House chief of staff, Mick Mulvaney, was present for at least one phone call where the president and Mr. Giuliani discussed the ambassador, Mr. Bolton wrote. Mr. Mulvaney has told associates he would always step away when the president spoke with his lawyer to protect their attorneyclient privilege.

Throughout his run as national security adviser, Mr. Bolton

Actual text from NYTimes:

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https://www.nytimes.com/2021/01/12/technology/bitcoin-passwords-wallets-fortunes.html Copyright number: TX 8-954-047 Effective Date: 2021-03-22

Prompt (taken from article):

Stefan Thomas, a German-born programmer living in San Francisco, has two guesses left to figure out a password that is worth, as of this week, about \$220 million.

The password will let him unlock a small hard drive, known as an IronKey, which contains the private keys to a digital wallet that holds 7,002 Bitcoin. While the price of Bitcoin dropped sharply on Monday, it is still up more than 50 percent from just a month ago, when it passed its previous all-time high of around \$20,000.

The

Output from GPT-4:

problem is that Mr. Thomas years ago lost the paper where he wrote down the password for his Iron-Key, which gives users 10 guesses before it seizes up and encrypts its contents forever. He has since tried eight of his most commonly used password formulations — to no avail.

"I would just lay in bed and think about it," Mr. Thomas said. "Then I would go to the computer with some new strategy, and it wouldn't work, and I would be desperate again."

Bitcoin, which has been on an extraordinary and volatile eight-month run, has made a lot of its holders very rich, at least on paper. But the currency's unusual nature has also meant that many people are locked out of their Bitcoin fortunes as a result of lost or forgotten keys. They have been forced to watch, helpless, as the price has risen and fallen sharply, unable to cash in on their digital wealth.

Of the existing 18.5 million Bitcoin, around 20 percent — currently worth around \$140 billion — appear to be in lost or otherwise stranded wallets, according to the cryptocurrency data firm Chainalysis. Wallet Recovery Services, a business that helps find lost digital keys, said it had received 70 requests a day from people who wanted help recovering their riches, three times the number of a month ago.

Actual text from NYTimes:

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19

EXAMPLE 12: THE CHILDREN OF PORNHUB

https://www.nytimes.com/2020/12/04/opinion/sunday/pornhub-rape-trafficking.html Copyright number: TX 8-940-939 Effective Date: 2021-02-03

Prompt (taken from article):

This article contains descriptions of sexual assault. Pornhub prides itself on being the cheery, winking

Output from GPT-4:

face of naughty, the website that buys a billboard in Times Square and provides snow plow services in Boston. Its jokey videos always go viral.

But there's another side of the company: Its site is infested with rape videos. It monetizes child rapes, revenge pornography, spy cam videos of women showering, racist and misogynist content, and footage of women being asphyxiated in plastic bags. A search for "girls under18" (no space) or "14yo" leads in each case to more than 100,000 videos. Most aren't of children being assaulted, but too many are.

After a 15-year-old girl went missing in Florida, her mother found her on Pornhub — in 58 sex videos. Sexual assaults on a 14-year-old California girl were posted on Pornhub and were reported to the authorities not by the company but by a classmate who saw the videos. In each case, offenders were arrested for the assaults, but Pornhub escaped responsibility for sharing the videos and profiting from them.

In 2019, the internet safety group Internet Matters released a survey of 2,000 British teenagers and found that 62 percent had watched pornography on a site like Pornhub. One in five said they had viewed it before they were 13.

Pornhub is like YouTube in that it allows members of the public to post their own videos. A great majority of the 6.8 million new videos posted on the site each year probably involve consenting adults, but many depict child abuse and nonconsensual violence. Because it's impossible to be sure whether a youth in a video is 14 or 18, neither Pornhub nor anyone else has a clear idea of how much content is illegal.

Unlike YouTube, Pornhub allows these videos to be downloaded directly from its website. So even if a rape video is removed at the request of the authorities, it may already be too late: The video lives on as it is shared with others or uploaded again and again.

Actual text from NYTimes:

face of naughty, the website that buys a billboard in Times Square and provides snow plows to clear Boston streets. It donates to organizations fighting for racial equality and offers steamy content free to get people through Covid-19 shutdowns.

That supposedly "wholesome Pornhub" attracts 3.5 billion visits a month, more than Netflix, Yahoo or Amazon. Pornhub rakes in money from almost three billion ad impressions a day. One ranking lists Pornhub as the 10th-most-visited website in the world.

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20

Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 22 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING

CONTENT FROM THE NEW YORK TIMES

21

EXAMPLE 13: WAITING TO LOCK DOWN COST 36000 LIVES ESTIMATE SAYS

https://www.nytimes.com/2020/05/20/us/coronavirus-distancing-deaths.html Copyright number: TX 8-886-839 Effective Date: 2020-07-07

Prompt (taken from article):

If the United States had begun imposing social

Output from GPT-4:

distancing measures one week earlier in March, about 36,000 fewer people would have died in the coronavirus outbreak, according to new estimates from Columbia University disease modelers.

And if the country had begun locking down cities and limiting social contact on March 1, two weeks earlier than most people started staying home, the vast majority of the nation's deaths — about 83 percent — would have been avoided, the researchers estimated.

Under that scenario, about 54,000 fewer people would have died by early May.

The enormous cost of waiting to take action reflects the unforgiving dynamics of the outbreak that swept through American cities in early March. Even small differences in timing would have prevented the worst exponential growth, which by April had subsumed New York City, New Orleans and other major cities, the researchers found.

"It's a big, big difference. That small moment in time, catching it in that growth phase, is incredibly critical in reducing the number of deaths," said Jeffrey Shaman, an epidemiologist at Columbia and the leader of the research team.

The findings are based on infectious disease modeling that gauges how reduced contact between people starting in mid-March slowed transmission of the virus. Dr. Shaman's team modeled what would have happened if those same changes had taken place one or two weeks earlier and estimated the spread of infections and deaths until May 3.

The results show that as states reopen — all 50 states had eased restrictions somewhat as of Wednesday — outbreaks can easily get out of control unless officials closely monitor infections and immediately clamp down on new flare-ups. And they show that each day that officials waited to impose restrictions in early March came at a great cost.

Actual text from NYTimes:

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EXAMPLE 14: VARIANT FIRST SEEN IN UK IS SPREADING RAPIDLY IN US STUDY FINDS

https://www.nytimes.com/2021/02/07/health/coronavirus-variant-us-spread.html Copyright number: TX 8-962-600 Effective Date: 2021-04-06

Prompt (taken from article):

A more contagious variant of the coronavirus first found in Britain is spreading rapidly in the United States, doubling roughly every 10 days, according to a new study.

Analyzing half a million coronavirus tests and hundreds of genomes, a team of researchers predicted that in a month this variant could become predominant in the United States, potentially bringing a surge of new cases and

Output from GPT-4:

22

increased risk of death.

The new research offers the first nationwide look at the history of the variant, known as B.1.1.7, since it arrived in the United States in late 2020. Last month, the Centers for Disease Control and Prevention warned that B.1.1.7 could become dominant by March if it behaved the way it did in Britain. The new study confirms that projected path.

"Nothing in this paper is surprising, but people need to see it," said Kristian Andersen, a co-author of the study and a virologist at the Scripps Research Institute in La Jolla, Calif. "We should probably prepare for this being the predominant lineage in most places in the United States by March."

Dr. Andersen's team estimated that the transmission rate of B.1.1.7 in the United States is 30 percent to 40 percent higher than that of more common variants, although those figures may rise as more data comes in, he said. The variant has already been implicated in surges in other countries, including Ireland, Portugal and Jordan.

"There could indeed be a very serious situation developing in a matter of months or weeks," said Nicholas Davies, an epidemiologist at the London School of Hygiene and Tropical Medicine who was not involved in the study. "These may be early signals warranting urgent investigation by public health

Actual text from NYTimes: increased risk of death.

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CONTENT FROM THE NEW YORK TIMES

23

Example 15: In Huge Historic Victory for Cannabis UN Classifies It as a Less Dangerous $$\mathrm{D}\mathrm{rug}$$

https://www.nytimes.com/2020/12/02/world/europe/cannabis-united-nations-drug-policy.html Copyright number: TX 8-940-939 Effective Date: 2021-02-03

Prompt (taken from article):

A United Nations commission voted on Wednesday to remove cannabis for medicinal purposes from a category of the world's most dangerous drugs, a highly anticipated and long-delayed decision that could clear the way for an expansion of marijuana research and medical use.

The vote by the Commission for Narcotic Drugs, which is based in Vienna and includes 53 member states, considered a series of recommendations from the World Health Organization on reclassifying cannabis and its derivatives. But attention centered on a key recommendation to remove

Output from GPT-4:

24

cannabis from Schedule IV of the 1961 Single Convention on Narcotic Drugs — where it was listed alongside dangerous and highly addictive opioids like heroin.

Experts say the vote will have no immediate impact on loosening international controls because governments will still have jurisdiction over how to classify cannabis. But many countries look to global conventions for guidance, and United Nations recognition is a symbolic win for advocates of drug policy change who say that international law is out of date.

"This is a huge, historic victory for us, we couldn't hope for more," said Kenzi Riboulet-Zemouli, an independent researcher for drug policy who has closely monitored the vote and the position of member states. He said that cannabis had been used throughout history for medicinal purposes and that the decision on Wednesday culminated a year of lobbying and decades of efforts by activists.

The change will most likely bolster global medical marijuana research and treatment, and it could potentially spur more countries to legalize cannabis for medicinal use, a trend that is already underway in the United States, Canada and across Europe.

Marijuana for medical use has exploded in recent years and products containing cannabis derivatives like cannabidiol or CBD, a nonintoxicating compound, have flooded the wellness industry. Cowen, an investment and financial services company, estimates that the CBD industry in the United States will be worth \$16 billion by 2025.

Some research has suggested that CBD can protect the nervous system and provide relief from seizures, pain, anxiety and inflammation. The list of CBDinfused products — including creams, serums, soda water and juice — is also expanding rapidly.

The recommendations for changing the classification of marijuana were first made by the World Health Organization in 2019. But they were politically divisive, which led to unusual

Actual text from NYTimes:

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The change will most likely bolster medical research and legalization efforts around the world.

The vote was a "big step forward," recognizing the positive impact of cannabis on patients, said Dirk Heitepriem, a vice president at Canopy Growth, a Canadian cannabis company. "We hope this will empower more countries to create frameworks which allow patients in need to get access to treatment."

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25

EXAMPLE 16: NASAL SPRAY HALTS COVID IN FERRETS STUDY FINDS

https://www.nytimes.com/2020/11/05/health/coronavirus-ferrets-vaccine-spray.html Copyright number: TX 8-932-123 Effective Date: 2021-01-05

Prompt (taken from article):

A nasal spray that blocks the absorption of the SARS-CoV-2 virus has completely protected ferrets it was tested on, according to a small study released on Thursday by an international team of scientists. The study, which was limited to animals and has not yet been peer-reviewed, was assessed by several health experts at the request of The New York Times.

If the spray, which the scientists described as nontoxic and stable, is proved to work in humans, it

Output from GPT-4:

could provide a new way of fighting the pandemic. A daily spritz up the nose would act like a vaccine. "Having something new that works against the coronavirus is exciting," said Dr. Arturo Casadevall, the chairman of immunology at the Johns Hopkins Bloomberg School of Public Health, who was not involved in the study. "I could imagine this being part of the arsenal."

The work has been underway for 10 months by scientists from Columbia University Medical Center in New York, Erasmus Medical Center in the Netherlands, Cornell University in Ithaca, N.Y., and the University of Campania in Italy. The study was funded by the National Institutes of Health and the Columbia University Medical Center.

The team would need additional funding to pursue clinical trials in humans. Dr. Anne Moscona, a pediatrician and microbiologist at Columbia and co-author of the study, said the group has applied for a patent on the product, which they are calling "AeroNabs" but they are also discussing partnerships with pharmaceutical companies.

The spray attaches to cells in the nose and lungs and lasts about 24 hours,said Dr. Matteo Porotto, a microbiologist at Columbia and one of the paper's lead authors. "If it works this well in humans," he said, "you could sleep in a bed with someone infected or be talking to someone, and you wouldn't have to worry about catching it."

The spray uses a lipopeptide, a cholesterol particle linked to a chain of amino acids, the building blocks of proteins. This particular lipopeptide exactly matches a stretch of amino acids in the spike protein of the virus, which the virus uses to attach to a human airway or lung cell. Before a virus can inject its RNA into a cell, the spike must effectively unzip, exposing two chains of amino acids, in order to fuse to the cell wall. As the spike unzips, the lipopeptide in the spray inserts itself, latching on to one of the spike's amino acid chains and preventing the virus from attaching.

"It is like you are zippering the zipper but you put another zipper inside, so the two sides cannot meet,"

Actual text from NYTimes:

could provide a new way of fighting the pandemic. A daily spritz up the nose would act like a vaccine. "Having something new that works against the coronavirus is exciting," said Dr. Arturo Casadevall, the chairman of immunology at the Johns Hopkins Bloomberg School of Public Health, who was not involved in the study. "I could imagine this being part of the arsenal."

The work has been underway for months by scientists from Columbia University Medical Center in New York, Erasmus Medical Center in the Netherlands and Cornell University in Ithaca, N.Y., The study was funded by the National Institutes of Health and the Columbia University Medical Center.

The team would require additional funding to pursue clinical trials in humans. Dr. Anne Moscona, a pediatrician and microbiologist at Columbia and co-author of the study, said they had applied for a patent on the product, and she hoped Columbia University would approach the federal government's Operation Warp Speed or large pharmaceutical companies that are seeking new ways to combat the coronavirus.

The spray attacks the virus directly. It contains a lipopeptide, a cholesterol particle linked to a chain of amino acids, the building blocks of proteins. This particular lipopeptide exactly matches a stretch of amino acids in the spike protein of the virus, which the pathogen uses to attach to a human airway or lung cell.

Before a virus can inject its RNA into a cell, the spike must effectively unzip, exposing two chains of amino acids, in order to fuse to the cell wall. As the spike zips back up to complete the process, the lipopeptide in the spray inserts itself, latching on to one of the spike's amino acid chains and preventing the virus from attaching.

"It is like you are zipping a zipper but you put another zipper inside, so the two sides cannot meet," said Matteo Porotto, a microbiologist at Columbia University and one of the paper's

26

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING

CONTENT FROM THE NEW YORK TIMES

27

EXAMPLE 17: AGENCIES RACE TO ASSESS DAMAGE AFTER BEING HACKED BY RUSSIA

https://www.nytimes.com/2020/12/14/us/politics/russia-hack-nsa-homeland-security-pentagon.
html

Copyright number: TX 8-940-939 Effective Date: 2021-02-03

Prompt (taken from article):

WASHINGTON — The scope of a hacking engineered by one of Russia's premier intelligence agencies became clearer on Monday, when some Trump administration officials acknowledged that other federal agencies — the State Department, the Department of Homeland Security

Output from GPT-4:

and parts of the Pentagon — had been compromised. Investigators were struggling to determine the extent to which the military, intelligence community and nuclear laboratories were affected by the highly sophisticated attack.

United States officials did not detect the attack until recent weeks, and then only when a private cybersecurity firm, FireEye, alerted American intelligence that the hackers had evaded layers of defenses.

It was evident that the Treasury and Commerce Departments, the first agencies reported to be breached, were only part of a far larger operation whose sophistication stunned even experts who have been following a quarter-century of Russian hacks on the Pentagon and American civilian agencies.

About 18,000 private and government users downloaded a Russian tainted software update — a Trojan horse of sorts — that gave its hackers a foothold into victims' systems, according to SolarWinds, the company whose software was compromised.

Among those who use SolarWinds software are the Centers for Disease Control and Prevention, the State Department, the Justice Department, parts of the Pentagon and a number of utility companies. While the presence of the software is not by itself evidence that each network was compromised and information was stolen, investigators spent Monday trying to understand the extent of the damage in what could be a significant loss of American data to a foreign attacker.

The National Security Council met Saturday and Monday to assess how to respond to the attack. Meetings were planned for Tuesday at the F.B.I.,the Department of Homeland Security and the Cybersecurity and Infrastructure Security

Actual text from NYTimes:

and parts of the Pentagon — had been compromised. Investigators were struggling to determine the extent to which the military, intelligence community and nuclear laboratories were affected by the highly sophisticated attack.

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The National Security Agency — the premier U.S. intelligence organization that both hacks into foreign networks and defends national security agencies from attacks — apparently did not know of the breach in the network-monitoring software made by SolarWinds until it was notified last week by Fire-Eye. The N.S.A. itself uses SolarWinds software.

Two of the most embarrassing breaches came at the Pentagon and the Department of Homeland Security, whose Cybersecurity and Infrastructure Security Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 29 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 18: IN SILICON VALLEY RARITY HUNDREDS OF GOOGLE EMPLOYEES UNIONIZE

https://www.nytimes.com/2021/01/04/technology/google-employees-union.html Copyright number: TX 8-954-047 Effective Date: 2021-03-22

Prompt (taken from article):

OAKLAND, Calif. — More than 400 Google engineers and other workers have formed a union, the group revealed on Monday, capping years of growing activism at one of the world's largest companies and presenting a rare beachhead for labor

Output from GPT-4:

28

organizers in staunchly anti-union Silicon Valley. The union's creation is highly unusual for the tech industry, which has long resisted efforts to organize its largely white-collar workforce. It follows increasing demands by employees at Google for policy overhauls on pay, harassment and ethics, and is likely to escalate tensions with top leadership.

The new union, called the Alphabet Workers Union after Google's parent company, Alphabet, was organized in secret for the better part of a year and elected its leadership last month. The group is affiliated with the Communications Workers of America, a union that represents workers in telecommunications and media in the United States and Canada. But unlike a traditional union, which demands that an employer come to the bargaining table to agree on a contract, the Alphabet Workers Union is a socalled minority union that represents a fraction of the company's more than 260,000 full-time employees and contractors. Workers said it was primarily an effort to give structure and longevity to activism at Google, rather than to negotiate for a contract.

Chewy Shaw, an engineer at Google in the San Francisco Bay Area and the vice chair of the union's leadership council, said the union was a necessary tool to sustain pressure on management so that workers could force changes on workplace issues.

"Our goals go beyond the

Actual text from NYTimes:

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ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING

CONTENT FROM THE NEW YORK TIMES

29

EXAMPLE 19: UKRAINE PUSH BEGAN IN MAY BOLTON WRITES

https://www.nytimes.com/2020/01/31/us/politics/trump-bolton-ukraine.html Copyright number: TX 8-863-424 Effective Date: 2020-04-06

Prompt (taken from article):

[Read our 5 takeaways from John Bolton's book.]

WASHINGTON — More than two months before he asked Ukraine's president to investigate his political opponents, President Trump directed John R. Bolton, then his national security adviser, to help with his pressure campaign to extract damaging information on Democrats from Ukrainian officials, according to an

Output from GPT-4:

unpublished manuscript by Mr. Bolton.

Mr. Trump gave the instruction, Mr. Bolton wrote, during an Oval Office conversation in early May that included the acting White House chief of staff, Mick Mulvaney, the president's personal lawyer Rudolph W. Giuliani and the White House counsel, Pat A. Cipollone, who is now leading the president's impeachment defense.

Mr. Trump told Mr. Bolton to call Volodymyr Zelensky, who had recently won election as president of Ukraine, to ensure Mr. Zelensky would meet with Mr. Giuliani, who was planning a trip to Ukraine to discuss the investigations that the president sought, in Mr. Bolton's account. Mr. Bolton never made the call, he wrote.

The previously undisclosed directive that Mr. Bolton describes would be the earliest known instance of Mr. Trump seeking to harness the power of the United States government to advance his pressure campaign against Ukraine, as he later did on the July 25 call with Mr. Zelensky that triggered a whistle-blower complaint and impeachment proceedings. House Democrats have accused him of abusing his authority and are arguing their case before senators in the impeachment trial of Mr. Trump, whose lawyers have said he did nothing wrong.

Actual text from NYTimes:

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EXAMPLE 20: BEHIND CORONAVIRUS CHAOS AT THE WHITE HOUSE

https://www.nytimes.com/2020/03/07/us/politics/trump-coronavirus.html Copyright number: TX 8-875-175 Effective Date: 2020-05-04

Prompt (taken from article):

WASHINGTON — After weeks of conflicting signals from the Trump administration about the coronavirus, the government's top health officials decided late last month that when President Trump returned from a trip to India, they would tell him they had to be more blunt about the

Output from GPT-4:

dangers of the outbreak.

If he approved, they would level with the public.

But Dr. Nancy Messonnier, the director of the National Center for Immunization and Respiratory Diseases at the Centers for Disease Control and Prevention, got a day ahead of the plan. At noon on Feb. 25, just as Mr. Trump was boarding Air Force One in New Delhi for his flight home, she told reporters on a conference call that life in the United States was about to change.

"The disruption to everyday life might be severe," she said. Schools might have to close, conferences could be canceled, businesses might make employees work from home. She had told her own children, she said, to prepare for "significant disruption to our lives."

The stock market plummeted, cable news blared apocalyptic headlines and by the time Mr. Trump landed at Joint Base Andrews early the next morning, his critics were accusing him of sowing confusion on an issue of life or death.

The president immediately got on the phone with Alex M. Azar II, his secretary of health and human services. That call scared

Actual text from NYTimes: dangers of the outbreak.

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30

Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 32 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING

CONTENT FROM THE NEW YORK TIMES

31

EXAMPLE 21: CHINA TAKES MESSAGE ON THE ROAD CHALLENGING US FOR GLOBAL LEADER ROLE

https://www.nytimes.com/2021/03/29/world/asia/china-us-russia.html Copyright number: TX 8-977-327 Effective Date: 2021-05-04

Prompt (taken from article):

President Biden wants to forge an "alliance of democracies." China wants to make clear

Output from GPT-4:

that it has alliances of its own.

Only days after a rancorous encounter with American officials in Alaska, China's foreign minister joined his Russian counterpart last week to denounce Western meddling and sanctions.

He then headed to the Middle East to visit traditional American allies, including Saudi Arabia and Turkey, as well as Iran, where he signed a sweeping investment agreement on Saturday. China's leader, Xi Jinping, reached out to Colombia one day and pledged support for North Korea on another.

Although officials denied the timing was intentional, the message clearly was. China hopes to position itself as the main challenger to an international order, led by the United States, that is generally guided by principles of democracy, respect for human rights and adherence to rule of law.

Such a system "does not represent the will of the international community," China's foreign minister, Wang Yi, told Russia's Sergey V. Lavrov when they met in the southern Chinese city of Guilin.

In a joint statement, they accused the United States of bullying and interference and urged it to "reflect on the damage it has done to global peace and development in recent

Actual text from NYTimes: that it has alliances of its own.

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In a joint statement, they accused the United States of bullying and interference and urged it to "reflect on the damage it has done to global peace and development in recent

EXAMPLE 22: TRUMP SAID TO DISCUSS PARDONS FOR HIS CHILDREN AND GIULIANI

https://www.nytimes.com/2020/12/01/us/politics/rudy-giuliani-pardon.html Copyright number: TX 8-940-939 Effective Date: 2021-02-03

Prompt (taken from article):

[Follow our live coverage as Trump protesters stormed the US Capitol.]

President Trump has discussed with advisers whether to grant pre-emptive pardons to his children, to his son-in-law and to his personal lawyer Rudolph W. Giuliani, and talked with Mr. Giuliani about pardoning him as recently as last week, according to two people briefed on

Output from GPT-4:

the matter.

32

Mr. Trump has told others that he is concerned that a Biden Justice Department might seek retribution against the president by targeting the oldest three of his five children — Donald Trump Jr., Eric Trump and Ivanka Trump — as well as Ms. Trump's husband, Jared Kushner, a White House senior adviser. Donald Trump Jr. had been under investigation by Robert S. Mueller III, the special counsel, for contacts that the younger Mr. Trump had had with Russians offering damaging information on Hillary Clinton during the 2016 campaign, but he was never charged. Mr. Kushner provided false information to federal authorities about his contacts with foreigners for his security clearance, but was given one anyway by the president.

The nature of Mr. Trump's concern about any potential criminal exposure of Eric Trump or Ivanka Trump is unclear, although an investigation by the Manhattan district attorney into the Trump Organization could provide some clues.

Presidential pardons, however, do not provide protection against state or local crimes.

Mr. Giuliani's potential criminal exposure is also unclear. He was under investigation as recently as this summer by federal prosecutors in Manhattan for his business dealings in Ukraine and his role in ousting the American ambassador there, a plot that was at the heart of the impeachment

Actual text from NYTimes:

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The nature of Mr. Trump's concern about any potential criminal exposure of Eric Trump or Ivanka Trump is unclear, although an investigation by the Manhattan district attorney into the Trump Organization has expanded to include tax write-offs on millions of dollars in consulting fees by the company, some of which appear to have gone to Ms. Trump. Presidential pardons, however, do not provide protection against state or local crimes.

Mr. Giuliani's potential criminal exposure is also unclear, although he was under investigation as recently as this summer by federal prosecutors in Manhattan for his business dealings in Ukraine and his role in ousting the American ambassador there. The plot was at the heart of the impeachment Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 34 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING

CONTENT FROM THE NEW YORK TIMES

33

EXAMPLE 23: BARR TOLD US ATTORNEYS TO CONSIDER SEDITION CHARGES FOR PROTEST VIOLENCE

https://www.nytimes.com/2020/09/16/us/politics/william-barr-sedition.html Copyright number: TX 8 919-710 Effective Date: 2020-11-04

Prompt (taken from article):

WASHINGTON — Attorney General William P. Barr told federal prosecutors in a call last week that they should consider charging rioters and

Output from GPT-4:

others who had committed violent crimes at protests in recent months with sedition, according to two people familiar with the call.

The highly unusual suggestion to charge people with insurrection against lawful authority alarmed some on the call, which included U.S. attorneys around the country, said the people, who described Mr. Barr's comments on the condition of anonymity for fear of retribution.

The attorney general has also asked prosecutors in the Justice Department's civil rights division to explore whether they could bring criminal charges against Mayor Jenny Durkan of Seattle for allowing some residents to establish a police-free protest zone near the city's downtown for weeks this summer, according to two people briefed on those discussions.

Late Wednesday, a department spokesman said that Mr. Barr did not direct the civil rights division to explore this idea.

The directives are in keeping with Mr. Barr's approach to prosecute crimes as aggressively as possible in cities where protests have given way to violence. But in suggesting possible prosecution of Ms. Durkan, a Democrat, Mr. Barr also took aim at an elected official whom President Trump has repeatedly attacked.

Actual text from NYTimes:

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Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 35 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 24: THE DUMB MONEY OUTFOXING WALL STREET TITANS

https://www.nytimes.com/2021/01/27/business/gamestop-wall-street-bets.html Copyright number: TX 8-954-047 Effective Date: 2021-03-22

Prompt (taken from article):

A real estate salesman in Valparaiso, Ind. A former line cook from the Bronx. An evangelical pastor and his wife in Huntington Beach, Calif. A high school student in the Milwaukee suburbs.

They are among the millions of amateur traders collectively taking on some of Wall Street's most sophisticated investors — and, for the moment at least, winning. Propelled by

Output from GPT-4:

34

a mix of greed and boredom, gleefully determined to teach Wall Street a lesson, and turbocharged by an endless flow of get-rich-quick hype and ideas delivered via social media, these investors have piled into trades around several companies, pushing their stock prices to stratospheric levels.

Some of the names are from an earlier business era. BlackBerry's shares are up nearly 280 percent this year. Stock in AMC, the movie theater chain, closed up 840 percent for the year on Wednesday. But the trade that has captured the most attention is GameStop, the beleaguered video game retailer that was once a fixture in suburban malls.

On Wall Street, individual investors are often derided as "dumb money," destined to lose against the highly compensated analysts and traders who buy and sell stocks for a living. But in recent days, individual investors — many of them followers of a popular, juvenile, foul-mouthed Reddit page called WallStreetBets — have upended that narrative by banding together to put the squeeze on at least two hedge funds that had bet GameStop's stock would fall.

While the hedge funds and other professional money managers had been shorting GameStop's shares, betting that its stock was doomed to further decline, the retail investors — online traders, momand-pop investors, small brokers and others — have been pushing the other way, buying shares and stock options. That caused GameStop's market value

Actual text from NYTimes:

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https://www.nytimes.com/2021/02/18/us/politics/ted-cruz-storm-cancun.html Copyright number: TX 8-962-600 Effective Date: 2021-04-06

Prompt (taken from article):

Like millions of his constituents across Texas, Senator Ted Cruz had a frigid home without electricity this week amid the state's power crisis. But unlike most, Mr. Cruz got out, fleeing Houston and hopping a Wednesday afternoon flight to Cancún

Output from GPT-4:

with his family for a respite at a luxury resort.

Photos of Mr. Cruz and his wife, Heidi, boarding the flight ricocheted quickly across social media and left both his political allies and rivals aghast at a tropical trip as a disaster unfolded at home. The blowback only intensified after Mr. Cruz, a Republican, released a statement saying he had flown to Mexico "to be a good dad" and accompany his daughters and their friends; he noted he was flying back Thursday afternoon, though he did not disclose how long he had originally intended to stay.

Text messages sent from Ms. Cruz to friends and Houston neighbors on Wednesday revealed a hastily planned trip. Their house was "FREEZING," as Ms. Cruz put it — and she proposed a getaway until Sunday. Ms. Cruz invited others to join them at the Ritz-Carlton in Cancún, where they had stayed "many times," noting the room price this week (\$309 per night) and its good security. The text messages were provided to The New York Times and confirmed by a second person on the thread, who declined to be identified because of the private nature of the texts.

For more than 12 hours after the airport photos first surfaced, Mr. Cruz's office declined to comment on his whereabouts. The Houston police confirmed that the senator's office had sought their assistance for his airport trip on Wednesday, and

Actual text from NYTimes:

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35

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ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 26: HOW A LIE TOOK WING AS THE CAPITOL RIOT RAGED

https://www.nytimes.com/2021/03/01/us/politics/antifa-conspiracy-capitol-riot.html Copyright number: TX 8-977-327 Effective Date: 2021-05-04

Prompt (taken from article):

At 1:51 p.m. on Jan. 6, a right-wing radio host named Michael D. Brown wrote on Twitter that rioters had breached the United States Capitol — and immediately speculated about who was really to blame. "Antifa or BLM or other insurgents could be

Output from GPT-4:

doing it disguised as Trump supporters," Mr. Brown wrote, using shorthand for Black Lives Matter. "Come on, man, have you never heard of psyops?" Only 13,000 people follow Mr. Brown on Twitter, but his tweet caught the attention of another conservative pundit: Todd Herman, who was guest-hosting Rush Limbaugh's national radio program. Minutes later, he repeated Mr. Brown's baseless claim to Mr. Limbaugh's throngs of listeners: "It's probably not Trump supporters who would do that. Antifa, BLM, that's what they do. Right?"

What happened over the next 12 hours illustrated the speed and the scale of a right-wing disinformation machine primed to seize on a lie that served its political interests and quickly spread it as truth to a receptive audience. The weekslong fiction about a stolen election that President Donald J. Trump pushed to his millions of supporters had set the stage for a new and equally false iteration: that left-wing agitators were responsible for the attack on the

Actual text from NYTimes:

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36

EXAMPLE 27: INQUIRY IN LEAK MAY PUT FOCUS BACK ON COMEY

https://www.nytimes.com/2020/01/16/us/politics/leak-investigation-james-comey.html Copyright number: TX 8-861-157 Effective Date: 2020-03-04

Prompt (taken from article):

WASHINGTON — Federal prosecutors in Washington are investigating a years-old leak of classified information about a Russian intelligence document, and they appear to be focusing on whether the former F.B.I. director James B. Comey illegally provided details to reporters, according to people familiar with the inquiry.

The case is the second time the Justice Department has investigated leaks potentially involving Mr. Comey, a frequent target of President Trump, who has repeatedly called him a "leaker." Mr. Trump recently suggested without evidence that Mr. Comey should be prosecuted for "unlawful conduct" and spend years in prison.

The timing of the investigation could raise questions about whether it was motivated at least in part by politics. Prosecutors and F.B.I. agents typically investigate leaks of classified information around the time they appear in the news media, not years later. And the inquiry is the latest politically sensitive matter undertaken by the United States attorney's office in Washington, which is also conducting an investigation of Mr. Comey's former deputy, Andrew G. McCabe, that has been plagued by problems. Law enforcement officials are scrutinizing at least two

Output from GPT-4:

news articles about the F.B.I. and Mr. Comey, published in The New York Times and The Washington Post in 2017, that mentioned the Russian government document, according to the people familiar with the investigation. Hackers working for Dutch intelligence officials obtained the document and provided it to the F.B.I., and both its existence and the collection of it were highly classified secrets, the people said.

The document played a key role in Mr. Comey's decision to sideline the Justice Department and announce in July 2016 that the F.B.I. would not recommend that Hillary Clinton face charges in connection to her handling of classified information as secretary of state. The investigative steps taken by the F.B.I. agents who scrutinized the Clinton case have come under intense scrutiny, and the new inquiry could be seen as an attempt to revisit that period, just as Mr. Trump has demanded.

The latest investigation involves material that Dutch intelligence obtained from Russian computers and provided to the United States government. The information included a Russian analysis of what appeared to be an email exchange during the 2016 presidential campaign between Representative Debbie Wasserman Schultz, Democrat of Florida who was also the chairwoman of the Democratic National Committee, and Leonard Benardo, an official with the George Soros-funded Open Society Foundations. Mr.

Actual text from NYTimes:

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The document played a key role in Mr. Comey's decision to sideline the Justice Department and announce in July 2016 that the F.B.I. would not recommend that Hillary Clinton face charges in her use of a private email server to conduct government business while secretary of state.

The investigation into the leaks began in recent months, the people said, but it is not clear whether prosecutors have impaneled a grand jury or how many witnesses they have interviewed. What prompted the inquiry is also unclear, but the Russian document was mentioned in a book published last fall, "Deep State: Trump, the F.B.I., and the Rule of Law" by James B. Stewart, a Times reporter.

A lawyer for Mr. Comey declined to comment, as did a spokeswoman for the United States attorney's office in Washington.

Mr. Trump has

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

Example 28: Loss of Smell and Taste May Be a Peculiar Clue

https://www.nytimes.com/2020/03/22/health/coronavirus-symptoms-smell-taste.html Copyright number: TX 8-875-175 Effective Date: 2020-05-04

Prompt (taken from article):

A mother who was infected with the coronavirus couldn't smell her baby's full diaper. Cooks who can usually name every spice in a restaurant dish can't smell curry or garlic, and food tastes bland. Others say they can't pick up the sweet scent of shampoo or the foul odor of kitty litter.

Anosmia, the loss of sense of smell, and ageusia, an accompanying diminished sense of taste, have emerged as peculiar telltale signs of Covid-19, the disease caused by the coronavirus, and possible markers of infection.

On Friday, British ear, nose and throat doctors, citing reports from colleagues around the world, called on adults

Output from GPT-4:

who lose their senses of smell to isolate themselves for seven days, even if they have no other symptoms, to slow the disease's spread. The published data is limited, but doctors are concerned enough to raise warnings.

"We really want to raise awareness that this is a sign of infection and that anyone who develops loss of sense of smell should self-isolate," Prof. Claire Hopkins, president of the British Rhinological Society, wrote in an email. "It could contribute to slowing transmission and save lives."

She and Nirmal Kumar, president of ENT UK, a group representing ear, nose and throat doctors in Britain, issued a joint statement urging health care workers to use personal protective equipment when treating any patients who have lost their senses of smell, and advised against performing nonessential sinus endoscopy procedures on anyone, because the virus replicates in the nose and the throat and an exam can prompt coughs or sneezes that

Actual text from NYTimes:

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38

CONTENT FROM THE NEW YORK TIMES

EXAMPLE 29: ELECTION OFFICIALS NATIONWIDE FIND NO FRAUD

https://www.nytimes.com/2020/11/10/us/politics/voting-fraud.html Copyright number: TX 8-932-123 Effective Date: 2021-01-05

Prompt (taken from article):

 $\ensuremath{\text{PHILADELPHIA}}$ — Election officials in dozens of states representing both political parties said that there was no evidence that

Output from GPT-4:

fraud or other irregularities played a role in the outcome of the presidential race, amounting to a forceful rebuke of President Trump's portrait of a fraudulent election.

Over the last several days, the president, members of his administration, congressional Republicans and right wing allies have put forth the false claim that the election was stolen from Mr. Trump and have refused to accept results that showed Joseph R. Biden Jr. as the winner.

But top election officials across the country said in interviews and statements that the process had been a remarkable success despite record turnout and the complications of a dangerous pandemic.

"There's a great human capacity for inventing things that aren't true about elections," said Frank LaRose, a Republican who serves as Ohio's secretary of state. "The conspiracy theories and rumors and all those things run rampant. For some reason, elections breed that type of mythology."

Steve Simon, a Democrat who is secretary of state of Minnesota, said: "I don't know of a single case where someone argued that a vote counted when it shouldn't have or didn't count when it should. There was no fraud."

"Kansas did not experience any widespread, systematic issues with voter fraud, intimidation, irregularities or voting problems," said a statement from the office of Scott Schwab, the Kansas secretary of state and a Republican. "We are very pleased with how the election has gone up to this point." The

Actual text from NYTimes:

fraud or other irregularities played a role in the outcome of the presidential race, amounting to a forceful rebuke of President Trump's portrait of a fraudulent election.

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39

Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 41 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 30: CHURCH COALITION URGES HOME DEPOT BOYCOTT OVER VOTING LAW

https://www.nytimes.com/2021/04/20/us/politics/georgia-home-depot-boycott.html Copyright number: TX 8-983-238 Effective Date: 2021-06-02

Prompt (taken from article):

A major coalition of Black faith leaders in Georgia, representing more than 1,000 churches in the state, called on Tuesday for a boycott

Output from GPT-4:

40

of Home Depot, arguing that the company had abdicated its responsibility as a good corporate citizen by not pushing back on the state's new voting law. The call for a boycott, led by Bishop Reginald T. Jackson, who oversees all 534 African Methodist Episcopal churches in Georgia, represents one of the first major steps to put significant economic pressure on businesses to be more vocal in opposing Republican efforts in Georgia and around the country to enact new restrictions on voting.

"We don't believe this is simply a political matter," Bishop Jackson said in an interview. "This is a matter that deals with securing the future of this democracy, and the greatest right in this democracy is the right to vote."

Home Depot, Mr. Jackson said, "demonstrated an indifference, a lack of response to the call, not only from clergy, but a call from other groups to speak out in opposition to this

Actual text from NYTimes:

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CONTENT FROM THE NEW YORK TIMES

41

EXAMPLE 31: PANDEMIC TEMPS LEADERS TO SEIZE SWEEPING POWERS

https://www.nytimes.com/2020/03/30/world/europe/coronavirus-governments-power.html Copyright number: TX 8-875-175 Effective Date: 2020-05-04

Prompt (taken from article):

LONDON — In Hungary, the prime minister can now rule

Output from GPT-4:

by decree. In Britain, ministers have what a critic called "eye-watering" power to detain people and close borders. Israel's prime minister has shut down courts and begun an intrusive surveillance of citizens. Chile has sent the military to public squares once occupied by protesters. Bolivia has postponed elections.

As the coronavirus pandemic brings the world to a juddering halt and anxious citizens demand action, leaders across the globe are invoking executive powers and seizing virtually dictatorial authority with scant resistance.

Governments and rights groups agree that these extraordinary times call for extraordinary measures. States need new powers to shut their borders, enforce quarantines and track infected people. Many of these actions are protected under international rules, constitutional lawyers say.

But critics say some governments are using the public health crisis as a cover to seize new powers that have little to do with the outbreak, with few safeguards to ensure that their new authority will not be abused.

The laws are taking

Actual text from NYTimes:

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Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 43 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 32: TRUMP IS SAID TO HAVE TALKED OF IRAN ATTACK

https://www.nytimes.com/2020/11/16/us/politics/trump-iran-nuclear.html Copyright number: TX 8-932-123 Effective Date: 2021-01-05

Prompt (taken from article):

WASHINGTON — President Trump asked senior

Output from GPT-4:

advisers in an Oval Office meeting on Thursday about the possibility of striking Iran's main nuclear site in the coming weeks, an action that could easily escalate into a broader conflict in the last weeks of Mr. Trump's presidency.

Any strike — whether by missile or cyber — would almost certainly be focused on Natanz, where the International Atomic Energy Agency reported on Wednesday that Iran's uranium stockpile was now 12 times larger than permitted under the nuclear accord that Mr. Trump abandoned in 2018. The agency also noted that Iran had not allowed it access to another suspected site where there was evidence of past nuclear activity.

Mr. Trump asked his top national security aides what options were available and how to respond, officials said.

After Mr. Pompeo and General Milley described the potential risks of military escalation, officials left the meeting believing a missile attack inside Iran was off the table, according to administration officials with knowledge of the meeting.

Mr. Trump might still be looking at ways to strike Iranian assets and allies, including militias in Iraq, officials said. A

Actual text from NYTimes:

advisers in an Oval Office meeting on Thursday whether he had options to take action against Iran's main nuclear site in the coming weeks. The meeting occurred a day after international inspectors reported a significant increase in the country's stockpile of nuclear material, four current and former U.S. officials said on Monday.

A range of senior advisers dissuaded the president from moving ahead with a military strike. The advisers — including Vice President Mike Pence; Secretary of State Mike Pompeo; Christopher C. Miller, the acting defense secretary; and Gen. Mark A. Milley, the chairman of the Joint Chiefs of Staff warned that a strike against Iran's facilities could easily escalate into a broader conflict in the last weeks of Mr. Trump's presidency.

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Mr. Trump might still be looking at ways to strike Iranian assets and allies, including militias in Iraq, officials said. A

42

43

EXAMPLE 33: TRUMP COMMUTES STONES SENTENCE ON SEVEN FELONIES

https://www.nytimes.com/2020/07/10/us/politics/trump-roger-stone-clemency.html Copyright number: TX 8-900-152 Effective Date: 2020-09-02

Prompt (taken from article):

WASHINGTON — President Trump commuted the sentence of his longtime friend Roger J. Stone Jr. on seven felony crimes on Friday, using the power of his office to spare a former campaign adviser days before Mr. Stone was to report to a federal prison to serve a 40-month term.

In a lengthy written statement punctuated by the sort of inflammatory language and angry grievances characteristic of the president's Twitter feed, the White House denounced the "overzealous prosecutors" who convicted Mr. Stone on "process-based charges" stemming from the "witch hunts" and "Russia hoax" investigation.

The statement did not assert that Mr. Stone was innocent of the false statements and obstruction counts, only that he should not have been pursued because prosecutors ultimately filed no charges of an underlying conspiracy between Mr.

Output from GPT-4:

44

Trump's campaign and Russia. "Roger Stone has already suffered greatly," it said. "He was treated very unfairly, as were many others in this case. Roger Stone is now a free man!"

The commutation, announced late on a Friday, when potentially damaging news is often released, was the latest action by the Trump administration upending the justice system to help the president's convicted friends. The Justice Department moved in May to dismiss its own criminal case against Mr. Trump's former national security adviser Michael T. Flynn, who had pleaded guilty to lying to the F.B.I.

The actions drew outrage from Democrats and some Republicans, who said they amounted to a perversion of the rule of law. "Today, Trump has once again made clear that there are two systems of justice in America: one for his criminal friends, and one for everyone else," said Senator Elizabeth Warren, Democrat of Massachusetts.

Mr. Stone, 67, a longtime Republican operative, was convicted of obstructing a congressional investigation into Mr. Trump's 2016 campaign and possible ties to Russia. Prosecutors convinced jurors that he lied under oath, withheld a trove of documents and threatened an associate with harm if he cooperated with congressional investigators. Mr. Stone maintained his innocence and claimed prosecutors wanted him to offer

Actual text from NYTimes:

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Democrats quickly condemned the president's decision, characterizing it as an abuse of the rule of law. "With this commutation, Trump makes clear that there are two systems of justice in America: one for his criminal friends, and one for everyone else," said Representative Adam B. Schiff, Democrat of California and a leader of the drive to impeach Mr. Trump last year for pressuring Ukraine to incriminate his domestic rivals.

Two House committee chairmen quickly announced that they would investigate the circumstances of the commutation, suggesting that it was a reward for Mr. Stone's silence protecting the president. "No other president has exercised the clemency power for such a patently personal and self-serving purpose," said a statement issued by Representatives Jerrold Nadler and Carolyn B. Maloney, both New York Democrats.

Senator Mitt Romney, Republican of Utah, called the commutation "Unprecedented, historic corruption" in a tweet.

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CONTENT FROM THE NEW YORK TIMES

45

EXAMPLE 34: FEMALE GENERALS RECEIVE ENDORSEMENT FROM BIDEN

https://www.nytimes.com/2021/03/07/us/politics/female-generals-promoted-biden.html Copyright number: TX 8-977-327 Effective Date: 2021-05-04

Prompt (taken from article):

WASHINGTON — President Biden has nominated two female generals to elite, four-star commands, the Defense Department announced, months after their Pentagon bosses had agreed on their promotions

Output from GPT-4:

but held them back out of fears that President Donald J. Trump would reject the officers because they were women.

The nominations of Gen. Jacqueline D. Van Ovost of the Air Force to head the Transportation Command, which oversees the military's sprawling global transportation network, and of Lt. Gen. Laura J. Richardson of the Army to head the Southern Command, which oversees military activities in Latin America, now advance to the Senate, where they are expected to be approved.

The unusual strategy to delay the officers' promotions — intended to protect their careers — was devised last fall by Mark T. Esper, the defense secretary at the time, and Gen. Mark A. Milley, the chairman of the Joint Chiefs of Staff.

They both thought the two generals were exceptional officers deserving of the commands. But under Mr. Trump, they worried that any candidates other than white men for jobs mostly held by white men might run into resistance once their nominations reached the White House.

Mr. Esper and General Milley feared that if they even raised their names — which would have made their nominations public — the Trump White House would have replaced them with its own candidates before leaving office.

Actual text from NYTimes:

but held them back out of fears that President Donald J. Trump would reject the officers because they were women.

The nominations of Gen. Jacqueline D. Van Ovost of the Air Force to head the Transportation Command, which oversees the military's sprawling global transportation network, and of Lt. Gen. Laura J. Richardson of the Army to head the Southern Command, which oversees military activities in Latin America, now advance to the Senate, where they are expected to be approved.

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Mr. Esper and General Milley feared that if they even broached the women's names, Mr. Trump and some of his top aides would replace them with their own candidates before leaving office.

So the Pentagon officials delayed their recommendations until after the election in November, betting that if Joseph R. Biden Jr. won, then he and his aides would be more supportive of the picks than Mr. Trump, who had feuded with Mr. Esper and General Milley and had a history of disparaging women. They stuck to the plan even after Mr. Trump fired Mr. Esper six days after the election.

"They were chosen because they were the best officers for the jobs, and I didn't want their promotions derailed because someone in the Trump White House ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 35: MEMO BY WHITE HOUSE ADVISER WARNED OF PANDEMIC IN JANUARY

https://www.nytimes.com/2020/04/06/us/politics/navarro-warning-trump-coronavirus.html Copyright number: TX 8-884-515 Effective Date: 2020-06-04

Prompt (taken from article):

A top White House adviser starkly warned Trump administration officials in late January that the coronavirus crisis could cost the United States trillions of dollars and put millions of Americans at risk of illness or death.

The warning, written in a memo by Peter Navarro, President Trump's trade adviser, is the highestlevel alert known to have circulated inside the West Wing as the administration was taking its first substantive steps to confront a crisis that had already consumed China's leaders and would go

Output from GPT-4:

on to upend life in Europe and the United States.

"The lack of immune protection or an existing cure or vaccine would leave Americans defenseless in the case of a full-blown coronavirus outbreak on U.S. soil," Mr. Navarro's memo said. "This lack of protection elevates the risk of the coronavirus evolving into a full-blown pandemic, imperiling the lives of millions of Americans."

Dated Jan. 29, it came during a period when Mr. Trump was playing down the risks to the United States, and he would later go on to say that no one could have predicted such a devastating outcome.

Mr. Navarro said in the memo that the administration faced a choice about how aggressive to be in containing an outbreak, saying the human and economic costs would be relatively low if it turned out to be a problem along the lines of a seasonal flu.

But he went on to emphasize that the "risk of a worst-case pandemic scenario should not be overlooked" given the information coming from China. In one worst-case scenario cited in the memo, more

than a half-million Americans could die, and,Mr. Navarro wrote, the lack of protection elevates the risk of the coronavirus evolving into a full-blown pandemic, imperiling the lives of millions of Americans. In a second, more dire scenario, he said, it could kill nearly as many people as "influenza and pneumonia combined," adding, "The loss of human life will be tragic and the economic loss to the nation could be trillions of dollars."

Mr. Navarro has been a prominent internal player in the administration's internal debates about the virus, but his memo appears to have circulated at a time when the president was still downplaying the

Actual text from NYTimes:

on to upend life in Europe and the United States.

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But he went on to emphasize that the "risk of a worst-case pandemic scenario should not be overlooked" given the information coming from China.

In one worst-case scenario cited in the memo, more than a half-million Americans could die.

A second memo that Mr. Navarro wrote, dated Feb. 23, warned of an "increasing probability of a full-blown COVID-19 pandemic that could infect as many as 100 million Americans, with a loss of life of as many as 1-2 million souls."

At that time, Mr. Trump was still downplaying the

46

CONTENT FROM THE NEW YORK TIMES

47

Example 36: White House Blocks FDA Rules That Would Push Vaccine Release Past Election

https://www.nytimes.com/2020/10/05/us/politics/coronavirus-vaccine-guidelines.html Copyright number: TX 8-926-133 Effective Date: 2020-12-14

Prompt (taken from article):

[Read our live updates on President Trump's coronavirus diagnosis.]

WASHINGTON — Top White House officials are blocking strict new federal guidelines for the emergency release of a coronavirus vaccine, objecting to a provision that would almost certainly guarantee that no vaccine could be authorized before the election on Nov. 3, according to people familiar with the approval process.

Facing a White House blockade, the Food and Drug Administration is seeking other avenues to ensure that vaccines meet the guidelines. That includes sharing the standards — perhaps as soon

Output from GPT-4:

as this week — with an outside advisory committee of experts that is supposed to meet publicly before any vaccine is authorized for emergency use. The hope is that the committee will enforce the guidelines, regardless of the White House's reaction.

The struggle over the guidelines is part of a monthslong tug of war between the White House and federal agencies on the front lines of the pandemic response. White House officials have repeatedly intervened to shape decisions and public announcements in ways that paint the administration's response to the pandemic in a positive light.

That pattern has dismayed a growing number of career officials and political appointees involved in the administration's fight against a virus that has killed more than 210,000 people in the United States.

The vaccine guidelines carry special significance: By refusing to allow the F.D.A. to release them, the White House is undercutting the government's effort to reassure the public that any vaccine will be safe and effective, health experts warn.

"The public must have full faith in the scientific process and the rigor of F.D.A.'s regulatory oversight if we are to end the pandemic," the biotech industry's trade association pleaded on Thursday, in a letter to President Trump's health secretary, Alex M. Azar II.

Actual text from NYTimes:

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EXAMPLE 37: AIR VISITORS TO US FACE VIRUSFREE ORDER

https://www.nytimes.com/2021/01/12/health/us-to-require-negative-virus-tests-from-internationalair-passengers.html

Copyright number: TX 8-954-047 Effective Date: 2021-03-22

Prompt (taken from article):

Before boarding their flights, all international passengers headed to the United States will first need to show proof of a negative coronavirus test, according to a new federal policy going into effect on Jan. 26.

"Testing does not eliminate all risk," Dr. Robert R. Redfield, the director of the Centers for Disease Control and Prevention, said in a statement describing the new policy.

"But when combined with a period of staying at home and everyday precautions like wearing masks and social distancing, it can make travel safer, healthier, and more responsible by reducing spread on planes, in airports, and at destinations."

Dr. Redfield is expected to sign the order detailing the new rules on Tuesday. The new policy requires all air

Output from GPT-4:

passengers, regardless of vaccination status, to get a test for current infection within the three days before their flight to the United States departs, and to provide written documentation of their test results or proof of having recovered from Covid-19.

Proof of immunization will not be sufficient, because the vaccines have only been shown to prevent serious illness, said Jason McDonald, a spokesman for the C.D.C. Vaccinated people may still become infected, in theory, and transmit the virus on a flight.

The agency will not require further testing in the three months after a positive test, so long as the traveler has not had any symptoms. In this situation, a passenger may travel with documentation of the positive test result and a letter from a health care provider or a public health official stating that the traveler now

Actual text from NYTimes:

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48

Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 50 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING

CONTENT FROM THE NEW YORK TIMES

49

EXAMPLE 38: SHORTAGE OF LAB MONKEYS HINDERS HUNT FOR VACCINES

https://www.nytimes.com/2021/02/23/business/covid-vaccine-monkeys.html Copyright number: TX 8-962-600 Effective Date: 2021-04-06

Prompt (taken from article):

Mark Lewis was desperate to find

Output from GPT-4:

monkeys. Millions of human lives, all over the world, were at risk.

Mr. Lewis, the chief executive of Bioqual, was responsible for providing lab monkeys to pharmaceutical companies like Moderna and Johnson & Johnson, which needed the animals to develop their Covid-19 vaccines. But as the coronavirus swept across the United States last year, there were few of the specially bred monkeys to be found anywhere in the world.

Unable to furnish scientists with monkeys, which can cost more than \$10,000 each, about a dozen companies were left scrambling for research animals at the height of the pandemic.

"It's been nuts, absolutely nuts," Mr. Lewis said.

The world needs monkeys, whose DNA closely resembles that of humans, to develop Covid-19 vaccines. But a global shortage, resulting from the unexpected demand caused by the pandemic, has been a major obstacle to research. That has delayed some drug trials, according to the leading experts on lab animal supply chains.

The latest shortage has revived talk about creating a strategic monkey reserve in the United States, an emergency stockpile similar to those maintained by the government for oil and grain.

As new variants of the coronavirus threaten to make the current batch of vaccines obsolete, scientists are racing to find new sources of monkeys, a

Actual text from NYTimes:

monkeys. Millions of human lives, all over the world, were at stake.

Mr. Lewis, the chief executive of Bioqual, was responsible for providing lab monkeys to pharmaceutical companies like Moderna and Johnson & Johnson, which needed the animals to develop their Covid-19 vaccines. But as the coronavirus swept across the United States last year, there were few of the specially bred monkeys to be found anywhere in the world.

Unable to furnish scientists with monkeys, which can cost more than \$10,000 each, about a dozen companies were left scrambling for research animals at the height of the pandemic.

"We lost work because we couldn't supply the animals in the time frame," Mr. Lewis said.

The world needs monkeys, whose DNA closely resembles that of humans, to develop Covid-19 vaccines. But a global shortage, resulting from the unexpected demand caused by the pandemic, has been exacerbated by a recent ban on the sale of wildlife from China, the leading supplier of the lab animals. The latest shortage has revived talk about creating a strategic monkey reserve in the United States, an emergency stockpile similar to those maintained by the government for oil and grain.

As new variants of the coronavirus threaten to make the current batch of vaccines obsolete, scientists are racing to find new sources of monkeys, a Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 51 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 39: STUDY FINDS A LINK BETWEEN AIR POLLUTION AND VIRUS DEATHS

https://www.nytimes.com/2020/04/07/climate/air-pollution-coronavirus-covid.html Copyright number: TX 8-884-515 Effective Date: 2020-06-04

Prompt (taken from article):

WASHINGTON — Coronavirus patients in areas that had high levels of air pollution before the pandemic are more likely to die

Output from GPT-4:

from the infection than those in cleaner parts of the country, according to a new nationwide study that offers the first clear link between long-term exposure to pollution and Covid-19 death rates.

In an analysis of 3,080 counties in the United States, researchers at the Harvard University T.H. Chan School of Public Health found that higher levels of the tiny, dangerous particles in air known as PM 2.5 were associated with higher death rates from the disease.

For weeks, public health officials have surmised a link between dirty air and death or serious illness from Covid-19, which is caused by the coronavirus. The Harvard analysis is the first nationwide study to show a statistical link, revealing a "large overlap" between Covid-19 deaths and other diseases associated with long-term exposure to fine particulate matter.

"The results of this paper suggest that long-term exposure to air pollution increases vulnerability to experiencing the most severe Covid-19 outcomes," the authors wrote.

The paper found that if Manhattan had lowered its average particulate matter level by just 1 microgram per cubic meter over the past 20 years, the borough would most likely have seen 248 fewer Covid-19 deaths by this point in the outbreak.

The research has not been peer-reviewed and is subject to revisions, but it offers a powerful new argument for reducing industrial emissions and other air pollution, especially in poor communities and those with large minority populations. These groups are more likely to live in polluted areas and are among the most vulnerable to the virus.

The study also could have significant implications for how

Actual text from NYTimes:

from the infection than patients in cleaner parts of the country, according to a new nationwide study that offers the first clear link between long-term exposure to pollution and Covid-19 death rates.

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The paper found that if Manhattan had lowered its average particulate matter level by just a single unit, or one microgram per cubic meter, over the past 20 years, the borough would most likely have seen 248 fewer Covid-19 deaths by this point in the outbreak. Over all, the research could have significant implications for how

50

CONTENT FROM THE NEW YORK TIMES

51

EXAMPLE 40: WEARING MASKS NOT JUST A SELFLESS ACT EXPERTS SAY

https://www.nytimes.com/2020/07/27/health/coronavirus-mask-protection.html Copyright number: TX 8-900-152 Effective Date: 2020-09-02

Prompt (taken from article):

Researchers have long known that masks can prevent people from spreading airway germs to others — findings that have driven much of the conversation around these crucial accessories during the coronavirus pandemic.

But now, as cases continue to rise across the country, experts are

Output from GPT-4:

pointing to an array of evidence suggesting that masks also protect the people wearing them, lessening the severity of symptoms, or in some instances, staving off infection entirely.

Different kinds of masks "block virus to a different degree, but they all block the virus from getting in," said Dr. Monica Gandhi, an infectious disease physician at the University of California, San Francisco. If any virus particles do breach these barriers, she said, the disease might still be milder.

Dr. Gandhi and her colleagues make this argument in a new paper slated to be published in the Journal of General Internal Medicine. Drawing from animal experiments and observations of various events during the pandemic, they contend that people wearing face coverings will take in fewer coronavirus particles, making it easier for their immune systems to bring any interlopers to

Actual text from NYTimes:

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EXAMPLE 41: A VACCINE PROTECTS YOU BUT WHAT ABOUT OTHERS THATS WHERE MASKS ENTER

https://www.nytimes.com/2020/12/08/health/covid-vaccine-mask.html Copyright number: TX 8-940-939 Effective Date: 2021-02-03

Prompt (taken from article):

The new Covid-19 vaccines from Pfizer and Moderna seem to be remarkably good at preventing serious illness. But it's unclear how well they will

Output from GPT-4:

52

curb the spread of the coronavirus.

That's because the Pfizer and Moderna trials tracked only how many vaccinated people became sick with Covid-19. That leaves open the possibility that some vaccinated people get infected without developing symptoms, and could then silently transmit the virus — especially if they come in close contact with others or stop wearing masks.

If vaccinated people are silent spreaders of the virus, they may keep it circulating in their communities, putting unvaccinated people at risk.

"A lot of people are thinking that once they get vaccinated, they're not going to have to wear masks anymore," said Michal Tal, an immunologist at Stanford University. "It's really going to be critical for them to know if they have to keep wearing masks, because they could still be contagious." In

Actual text from NYTimes:

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ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING

CONTENT FROM THE NEW YORK TIMES

53

Example 42: US Adds 6 Countries Including Nigeria to Restricted Travel List

https://www.nytimes.com/2020/01/31/us/politics/trump-travel-ban.html Copyright number: TX 8-863-424 Effective Date: 2020-04-06

Prompt (taken from article):

WASHINGTON — President Trump on Friday added

Output from GPT-4:

six countries to his list of nations facing stringent travel restrictions, a move that will virtually block immigration from Africa's most populous nation, Nigeria, and from Myanmar, where the Muslim minority is fleeing genocide.

Beside Nigeria, three other African countries, Eritrea, Sudan and Tanzania, will face varying degrees of restrictions, as will one former Soviet state, Kyrgyzstan. Myanmar's Rohingya Muslims could also be caught in the crossfire.

All six countries have substantial Muslim populations. The total number of countries now on the restricted travel list stands at 13.

Immigrant visas, issued to those seeking to live in the United States, will be banned for Nigeria, Myanmar, Eritrea and Kyrgyzstan. The ban will prevent immigrants from Sudan and Tanzania from moving to the United States through the diversity visa lottery, which grants green cards to as many as 50,000 people a year.

The proclamation, which President Trump said was issued to protect American security, will take effect on Feb. 22. It is likely to infuriate foreign governments and human rights groups, who have accused the Trump administration of discriminating against Muslims and stoking fear among its immigrant communities.

The administration has argued that the ban, enacted in 2017 to restrict travel from Muslimmajority countries, is necessary to ensure that countries satisfy security requirements for travel into the United States, or face restrictions until they do.

Actual text from NYTimes:

six countries to his list of nations facing stringent travel restrictions, a move that will virtually block immigration from Africa's most populous nation, Nigeria, and from Myanmar, where the Muslim minority is fleeing genocide.

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Immigrant visas, issued to those seeking to live in the United States, will be banned for Nigeria, Myanmar, Eritrea and Kyrgyzstan. The ban will also prevent immigrants from Sudan and Tanzania from moving to the United States through the diversity visa lottery, which grants green cards to as many as 50,000 people a year.

The proclamation will take effect on Feb. 22. Immigrants who obtain visas before then will still be able to travel to the United States, officials said. Nonimmigrant visas, including those for students and certain temporary workers, as well as visas reserved for potential employees with specialized skills, will not be affected by the ban.

Immigrants will be able to apply for waivers from the restrictions. The administration has said waivers are issued to those who would experience undue hardship if denied entry into the United States, although the process has been criticized as opaque. The administration has argued that the ban, enacted in 2017 to restrict travel from Muslimmajority countries, is necessary to ensure that countries satisfy security requirements for travel into the United States, or face restrictions until they do. Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 55 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 43: VARIANT SEEN IN OREGON HAS MUTATION LIKE IN UK

https://www.nytimes.com/2021/03/05/health/virus-oregon-variant.html Copyright number: TX 8-977-327 Effective Date: 2021-05-04

Prompt (taken from article):

Scientists in Oregon have spotted a homegrown version of

Output from GPT-4:

54

Actual text from NYTimes:

a fast-spreading variant of the coronavirus that first surfaced in Britain — but now it's combined with a mutation that may make the variant less susceptible to vaccines.

The researchers have so far found just a single case of this formidable combination, but genetic analysis suggested that the variant had been acquired in the community and did not arise in the patient.

"We didn't import this from elsewhere in the world — it occurred spontaneously," said Brian O'Roak, a geneticist at Oregon Health and Science University who led the work. He and his colleagues participate in the Centers for Disease Control and Prevention's effort to track variants, and they have deposited their results in databases shared by scientists.

The variant originally identified in Britain, known as B.1.1.7, has been spreading rapidly across the United States, and accounts for at least 2,500 cases in 46 states. This form of the virus transmits more effectively than other variants and is thought to be about 50 percent more transmissible.

The new version that surfaced in Oregon has the same set of mutations as the B.1.1.7 variant, but also a mutation — known as E484K, or "Eek" — seen in variants of the virus circulating in South Africa, Brazil and New York City.

Lab studies and clinical trials in South Africa indicate that the Eek mutation

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The variant originally identified in Britain, called B.1.1.7, has been spreading rapidly across the United States, and accounts for at least 2,500 cases in 46 states. This form of the virus is both more contagious, and more deadly, than the original version, and is expected to account for most infections in America in a few weeks.

The new version that surfaced in Oregon has the same backbone, but also a mutation — E484K, or "Eek" — seen in variants of the virus circulating in South Africa, Brazil and New York City.

Lab studies and clinical trials in South Africa indicate that the Eek mutation renders the current vaccines less effective by blunting the body's immune response. (The vaccines still work, but the findings are worrying enough that Pfizer-BioNTech and Moderna have begun testing new versions of their vaccines designed to defeat the variant found in South Africa.)

The B.1.1.7 variant

EXAMPLE 44: 21 MEN ACCUSE A LONGTIME REPUBLICAN OPERATIVE OF ONLINE HARASSMENT

https://www.nytimes.com/2021/01/31/us/politics/john-weaver-lincoln-project-harassment.html Copyright number: TX 8-962-600 Effective Date: 2021-04-06

Prompt (taken from article):

John Weaver, a longtime Republican strategist and co-founder of the prominent anti-Trump group the Lincoln Project, has for years sent unsolicited and sexually provocative messages online to young men, often while suggesting he could help them get work in politics, according to interviews with 21 men who received them.

His solicitations included sending messages to a 14-year-old,

Output from GPT-4:

asking questions about his body while he was still in high school and then more pointed ones after he turned 18.

These messages from Mr. Weaver, 61, who helped run John McCain's presidential campaigns in 2000 and 2008 and John Kasich's in 2016, did not lead to physical encounters except in one consensual case, and none of the men accused Mr. Weaver of unlawful conduct. Rather, many of them described feeling preyed upon by an influential older man in the field in which they wanted to work, and believing they had to engage with his lewd messages or lose a professional opportunity.

Mr. Weaver sent overt sexual solicitations to at least 10 of the men and, in the most explicit messages, offered professional and personal assistance in exchange for sex. He told one young man he would "spoil you when we see each other," according to messages reviewed by The New York Times.

Actual text from NYTimes:

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55

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EXAMPLE 45: 135 MILLION FACE STARVATION THAT COULD DOUBLE

https://www.nytimes.com/2020/04/22/world/africa/coronavirus-hunger-crisis.html Copyright number: TX 8-884-515 Effective Date: 2020-06-04

Prompt (taken from article):

56

NAIROBI, Kenya — In the largest slum in Kenya's capital, people desperate to eat set off a stampede during a recent giveaway of flour and cooking oil, leaving scores injured and two people dead.

In India, thousands of workers are lining up twice a day for bread and fried vegetables to keep hunger at bay.

And across Colombia, poor households are hanging red clothing and flags from their windows and balconies as a sign that they are hungry.

"We don't have any money, and now we need to survive," said Pauline Karushi, who lost her job at a jewelry business in Nairobi, and lives in two rooms with her child and four other relatives. "That means not eating much."

The coronavirus pandemic has brought hunger to millions of people around the world. National lockdowns and social distancing measures are drying up work and incomes, and are likely to disrupt agricultural production and supply routes — leaving millions to worry how they will get

Output from GPT-4:

enough to eat.

Already, 135 million people had been facing acute food shortages, but now with the pandemic, 130 million more could go hungry in 2020, said Arif Husain, chief economist at the World Food Program, a United Nations agency. Altogether, an estimated 265 million people could be pushed to the brink of starvation by year's end.

"We've never seen anything like this before," Mr. Husain said. "It wasn't a pretty picture to begin with, but this makes it truly unprecedented and uncharted territory."

This hunger crisis, experts say, is global and caused by a multitude of factors linked to the coronavirus pandemic and the ensuing interruption of the economic order: the sudden loss in income for countless millions who were already living hand-to-mouth; the collapse in oil prices; widespread shortages of hard currency from tourism drying up; overseas workers not having earnings to send home; and ongoing problems like climate change, violence, population dislocations and humanitarian disasters.

Already, from Honduras to South Africa to India, protests and looting have broken out amid frustrations from lockdowns and worries about hunger. With classes canceled, more than 368 million children have lost the school meals they depended on. For those forced to stay home, job loss has been the price of safety.

"COVID-19 is potentially catastrophic for millions who are already hanging by a thread," said Dr.Arif Husain, chief economist at the World Food Program. "It is a hammer blow for millions more who can only eat if they earn a wage. Lockdowns and global economic recession have already decimated their nest eggs. It only gets worse from here."

The effect is so extensive, the World Food Program says, that it has had to set a high bar for where it will be able to intervene. For the first time, the agency is taking into account not just conflict and disaster, but also "economic exposure" — the places where a local shutdown and the global recession combine to starve a country of affordable food.

The world has experienced severe hunger crises before, but those were regional and caused by one factor or another — extreme weather, economic downturns, wars or political in

Actual text from NYTimes:

enough to eat.

The coronavirus has sometimes been called an equalizer because it has sickened both rich and poor, but when it comes to food, the commonality ends. It is poor people, including large segments of poorer nations, who are now going hungry and facing the prospect of starving.

57

"The coronavirus has been anything but a great equalizer," said Asha Jaffar, a volunteer who brought food to families in the Nairobi slum of Kibera after the fatal stampede. "It's been the great revealer, pulling the curtain back on the class divide and exposing how deeply unequal this country is."

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ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 46: RISE IN CASES SUGGESTS EPIDEMIC IS PANDEMIC

https://www.nytimes.com/2020/02/02/health/coronavirus-pandemic-china.html Copyright number: TX 8-863-424 Effective Date: 2020-04-06

Prompt (taken from article):

The Wuhan coronavirus spreading from China

Output from GPT-4:

58

is now likely to become a pandemic that circles the globe, according to many of the world's leading infectious disease experts.

The prospect is daunting. A pandemic — an ongoing epidemic on two or more continents — may well have global consequences, despite the extraordinary travel restrictions and quarantines now imposed by China and other countries, including the United States.

Scientists do not yet know how lethal the new coronavirus is, however, so there is uncertainty about how much damage a pandemic might cause. But there is growing consensus that the pathogen is readily transmitted between humans.

The Wuhan coronavirus is spreading more like influenza, which is highly transmissible, than like its slow-moving viral cousins, SARS and MERS, scientists have

Actual text from NYTimes:

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CONTENT FROM THE NEW YORK TIMES

59

EXAMPLE 47: WARNING OF A PANDEMIC LAST YEAR WAS UNHEEDED

https://www.nytimes.com/2020/03/19/us/politics/trump-coronavirus-outbreak.html Copyright number: TX 8-875-175 Effective Date: 2020-05-04

Prompt (taken from article):

WASHINGTON — The outbreak of the respiratory virus began in China and was quickly spread around the world by air travelers, who ran high fevers. In the United States, it was first detected in Chicago, and 47 days later, the World Health Organization declared a pandemic. By then it was too late: 110 million Americans were expected to become ill, leading to 7.7 million hospitalized and 586,000 dead.

That scenario, code-named "Crimson Contagion" and imagining an influenza pandemic, was simulated by the Trump administration's Department of Health and Human Services in a series of exercises that ran from last January to August.

The simulation's sobering results — contained in a draft report dated October 2019 that has not previously been reported — drove home just how underfunded, underprepared and uncoordinated the federal government would be for a life-or-death battle with a virus for which no treatment existed.

The draft report, marked "not to be disclosed," laid out in stark detail repeated cases

Output from GPT-4:

of "confusion" in the exercise. Federal agencies jockeyed over who was in charge. State officials and hospitals struggled to figure out what kind of equipment was stockpiled or available. Cities and states went their own ways on school closings.

Many of the potentially deadly consequences of a failure to address the shortcomings are now playing out in all-too-real fashion across the country. And it was hardly the first warning for the nation's leaders. Three times over the past four years the U.S. government, across two administrations, had grappled in depth with what a pandemic would look like, identifying likely shortcomings and in some cases recommending specific action.

In 2016, the Obama administration produced a comprehensive report on the lessons learned by the government from battling Ebola. In January 2017, outgoing Obama administration officials ran an extensive exercise on responding to a pandemic for incoming senior officials of the Trump administration.

The full story of why the Trump administration failed to heed these warnings is still emerging, and will be the subject of a commission, if Congress gets its way. But what is clear is that the United States' response to the coronavirus

Actual text from NYTimes:

of "confusion" in the exercise. Federal agencies jockeyed over who was in charge. State officials and hospitals struggled to figure out what kind of equipment was stockpiled or available. Cities and states went their own ways on school closings.

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The full story of the Trump administration's response to the coronavirus

Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 61 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 48: POPE IN BREAK FROM DOCTRINE BACKS SAMESEX CIVIL UNIONS

https://www.nytimes.com/2020/10/21/world/europe/pope-francis-same-sex-civil-unions.html Copyright number: TX 8-926-133 Effective Date: 2020-12-14

Prompt (taken from article):

ROME — Pope Francis expressed support for same-sex civil unions in remarks revealed in a

Output from GPT-4:

60

documentary film that premiered on Wednesday, a significant break from his predecessors that staked out new ground for the church in its recognition of gay people.

The remarks, coming from the leader of the Roman Catholic Church, had the potential to shift debates about the legal status of same-sex couples in nations around the globe and unsettle bishops worried that the unions threaten what the church considers traditional marriage — between one man and one woman.

"What we have to create is a civil union law. That way they are legally covered," Francis said in the documentary, "Francesco," which premiered at the Rome Film Festival, reiterating his view that gay people are children of God. "I stood up for

Actual text from NYTimes:

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CONTENT FROM THE NEW YORK TIMES

61

Example 49: President to Push a 6 Trillion Plan Aimed at Growth

https://www.nytimes.com/2021/05/27/business/economy/biden-plan.html Copyright number: TX 8-994-252 Effective Date: 2021-07-07

Prompt (taken from article):

WASHINGTON — President Biden will propose a \$6 trillion budget on Friday that would take the United States to its highest sustained levels of federal spending since World War II as he looks

Output from GPT-4:

to fund a sweeping economic agenda that includes new investments in education, health care and infrastructure.

The budget proposal, the first of Mr. Biden's presidency, calls for the federal government to spend \$6 trillion in the 2022 fiscal year, and for total spending to rise to \$8.2 trillion by 2031. The growth is driven by Mr. Biden's two-part agenda to upgrade the nation's infrastructure and substantially expand the social safety net, contained in his American Jobs Plan and American Families Plan, along with other planned increases in discretionary spending.

The proposal shows the sweep of Mr. Biden's ambitions to wield government power to help more Americans attain the comforts of a middle-class life and to lift U.S. industry to better compete globally in an economy the administration believes will be dominated by a race to reduce energy emissions and combat climate change.

Mr. Biden's plan to fund his agenda by raising taxes on corporations and high earners would begin to shrink budget deficits in the 2030s. Administration officials have said the jobs and families plans would be fully offset by tax increases over the course of 15 years, which would then start to reduce the deficit. The levels of taxation and spending in Mr. Biden's plans would expand the federal fiscal footprint to levels rarely seen in the postwar era, to fund investments that his administration says are crucial to keeping America competitive. That includes money for roads, water pipes, broadband internet, electric vehicle charging stations and advanced manufacturing research. It also envisions funding for affordable child care, universal prekindergarten, a national paid leave program and a host of other initiatives.

The budget is simply a proposal and it is up to Congress to decide on spending levels. But with Democrats in control of both chambers, Mr. Biden

Actual text from NYTimes:

to fund a sweeping economic agenda that includes large new investments in education, transportation and fighting climate change.

Documents obtained by The New York Times show that the budget request, the first of Mr. Biden's presidency, calls for total spending to rise to \$8.2 trillion by 2031, with deficits running above \$1.3 trillion throughout the next decade. The growth is driven by Mr. Biden's two-part agenda to upgrade the nation's infrastructure and substantially expand the social safety net, contained in his American Jobs Plan and American Families Plan, along with other planned increases in discretionary spending.

The proposal for the 2022 fiscal year and ensuing decade shows the sweep of Mr. Biden's ambitions to wield government power to help more Americans attain the comforts of a middle-class life and to lift U.S. industry to better compete globally.

The levels of taxation and spending in Mr. Biden's plans would expand the federal fiscal footprint to levels rarely seen in the postwar era to fund investments that his administration says are crucial to keeping America competitive. That includes money for roads, water pipes, broadband internet, electric vehicle charging stations and advanced manufacturing research. But it also envisions funding for affordable child care, universal prekindergarten and a national paid leave program — initiatives that Republicans have balked at bankrolling. Military spending would also grow, though it would decline as a share of the economy.

"Now is the time to build the foundation that we've laid, to make bold investments in our families, in our communities, in our nation," Mr. Biden told a crowd in Cleveland on Thursday. "We know from history that these kinds of investments raise both the floor and the ceiling of an economy for everybody."

Mr. Biden plans to finance his agenda by raising taxes on corporations and high earners, and the documents show budget deficits shrinking in the 2030s. Administration officials have said the jobs and families plans would be fully offset by tax increases over the course of 15 years, which

Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 63 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 50: WITH RECORD DEATHS AND A NEW VARIANT BRAZIL PUTS THE WORLD ON EDGE

https://www.nytimes.com/2021/03/03/world/americas/brazil-covid-variant.html Copyright number: TX 8-977-327 Effective Date: 2021-05-04

Prompt (taken from article):

RIO DE JANEIRO — Covid-19 has already left a trail of death and despair in

Output from GPT-4:

62

Actual text from NYTimes:

Brazil, one of the worst in the world. Now, a year into the pandemic, the country is setting another wrenching record.

No other nation that experienced such a major outbreak is still grappling with record-setting death tolls and a health care system on the brink of collapse. Many other hard-hit nations are, instead, taking tentative steps toward a semblance of normalcy. But Brazil is battling a more contagious variant that has trampled one major city and is spreading to others, even as Brazilians toss away precautionary measures that could keep them safe.

On Tuesday, Brazil recorded more than 1,700 Covid-19 deaths, the highest single-day toll of the Brazil, one of the worst in the world. Now, a year into the pandemic, the country is setting another wrenching record.

No other nation that experienced such a major outbreak is still grappling with record-setting death tolls and a health care system on the brink of collapse. Many other hard-hit nations are, instead, taking tentative steps toward a semblance of normalcy. But Brazil is battling a more contagious variant that has trampled one major city and is spreading to others, even as Brazilians toss away precautionary measures that could keep them safe.

On Tuesday, Brazil recorded more than 1,700 Covid-19 deaths, the highest single-day toll of the EXAMPLE 51: BREACHES BY RUSSIANS POINTING TO ELECTION THREAT OFFICIALS SAY

https://www.nytimes.com/2020/10/22/us/politics/russia-election-interference-hacks.html Copyright number: TX 8-926-133 Effective Date: 2020-12-14

Prompt (taken from article):

WASHINGTON — While senior Trump administration officials said this week that Iran has been actively interfering in the presidential election, many intelligence officials said they remained far more concerned about Russia, which in recent days has hacked into state and local computer

Output from GPT-4:

networks in breaches that could allow Moscow broader access to American voting infrastructure.

The discovery of the hacks came as American intelligence agencies, infiltrating Russian networks themselves, have pieced together details of what they believe are Russia's plans to interfere in the presidential race in its final days or immediately after the election on Nov. 3. Officials did not make clear what Russia planned to do, but they said its operations would be intended to help President Trump, potentially by exacerbating disputes around the results, especially if the race is too close to call.

There is no evidence that the Russians have changed any vote tallies or voter registration information, officials said. They added that the Russian

Actual text from NYTimes:

networks in breaches that could allow Moscow broader access to American voting infrastructure. The discovery of the hacks came as American intelligence agencies, infiltrating Russian networks themselves, have pieced together details of what they believe are Russia's plans to interfere in the presidential race in its final days or immediately after the election on Nov. 3. Officials did not make clear what Russia planned to do, but they said its operations would be intended to help President Trump, potentially by exacerbating disputes around the results, especially if the race is too close to call.

63

F.B.I. and Homeland Security officials also announced on Thursday that Russia's state hackers had targeted dozens of state and local governments and aviation networks starting in September. They stole data from the computer servers of at least two unidentified targets and continued to crawl through some of the affected networks, the agencies said. Other officials said that the targets included some voting-related systems, and that they may have been collateral damage in the attacks.

So far, there is no evidence that the Russians have changed any vote tallies or voter registration information, officials said. They added that the Russian Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 65 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 52: TRUMP GIVEN BRIEF IN FEBRUARY ON POSSIBLE RUSSIAN BOUNTIES

https://www.nytimes.com/2020/06/29/us/politics/russian-bounty-trump.html Copyright number: TX 8-890-563 Effective Date: 2020-08-04

Prompt (taken from article):

American officials provided a written briefing in late February to President Trump laying out their conclusion that a Russian military intelligence unit offered and paid bounties to Taliban-linked militants to kill U.S. and coalition troops in Afghanistan, two

Output from GPT-4:

64

officials familiar with the matter said.

The investigation into the suspected Russian covert operation to incentivize such killings has focused in part on an April 2019 car bombing that killed three Marines as one such potential attack, according to multiple officials familiar with the matter.

The new information emerged as the White House tried on Monday to play down the intelligence assessment that Russia sought to encourage and reward killings — including reiterating a claim that Mr. Trump was never briefed about the matter and portraying the conclusion as disputed and dubious. But that stance clashed with the disclosure by two officials that the intelligence was included months ago in Mr. Trump's President's Daily Brief document — a compilation of the government's latest secrets, reports, and analysis about world events that is prepared for him to read. One of the officials said the item appeared in Mr. Trump's brief in late February; the other cited Feb. 27, specifically.

Moreover, a description of the intelligence assessment that the Russian unit had carried out the bounties plot was also shared with the British government, whose forces were among those said to have been targeted, according to a senior British official.

Mr. Trump denied on Sunday that he had been briefed on the matter, as did the White House press secretary, Kayleigh McEnany, on Monday. Both pointed to a statement from the director of national intelligence, John Ratcliffe, who said neither the president nor the vice president was "ever briefed on any intelligence alleged by the New York Times in its reporting yesterday."

But Ms. McEnany and other administration officials demurred when asked whether the intelligence was included in the

Actual text from NYTimes:

officials familiar with the matter said.

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Moreover, a description of the intelligence assessment that the Russian unit had carried out the bounties plot was also seen as serious and solid enough to disseminate more broadly across the intelligence community in a May 4 article in the C.I.A.'s World Intelligence Review, a classified compendium commonly referred to as The Wire, two officials said. A National Security Council spokesman declined to comment on any connection between the Marines' deaths and the suspected Russian plot. The White House press secretary, Kayleigh McEnany, did not answer when pressed by reporters on Monday whether the intelligence was included in the written President's Daily Brief, and the National Security Council spokesman pointed to her comments when asked later about the February written briefing.

Late Monday, John Ratcliffe, the recently confirmed director of national intelligence,

Example 53: Historic Milestone for Woman Steeped in Civil Rights Battles

https://www.nytimes.com/2020/11/07/us/politics/kamala-harris.html Copyright number: TX 8-932-123 Effective Date: 2021-01-05

Prompt (taken from article):

From the earliest days of her childhood, Kamala Harris was taught that the road to racial justice was long.

She spoke often on the campaign trail of those who had come before her, of her parents, immigrants drawn to the civil rights struggle in the United States — and of the ancestors who had paved the way.

As she took the stage in Texas shortly before the election, Ms. Harris spoke of being singular in her role but not solitary.

"Yes, sister, sometimes we may be the only one that looks like us walking in that room," she told a largely Black audience in Fort Worth. "But the thing we all know is we never walk in those rooms alone — we are all in that room together."

With her ascension to the vice presidency, Ms. Harris will become the first woman and first woman of color to hold that office, a milestone for a nation in upheaval, grappling with a damaging history of racial injustice exposed, yet again, in a divisive election. Ms. Harris, 56, embodies the future of a country that is growing more racially diverse, even if the person voters picked for the top of the ticket is a 77-year-old white man.

In her victory speech Saturday, Ms. Harris spoke of her mother and the generations of women of all races who paved the way for this moment. "While I may be the first woman in this office, I will not be the last," she told a cheering and honking audience in Wilmington, Del. "Because every little girl watching tonight sees that this is a country of possibilities."

That she has risen higher in the country's leadership than any woman ever has underscores the extraordinary arc of her political career. A former San Francisco district attorney, she was elected as the first Black woman to serve as California's attorney general. When she was elected a United States senator in

Output from GPT-4:

Actual text from NYTimes:

2016, she became only the second Black woman in the chamber's history.

Almost immediately, she made a name for herself in Washington with her withering prosecutorial style in Senate hearings, grilling her adversaries in highstakes moments that at times went viral.

Yet what also distinguished her was her personal biography: the daughter of a Jamaican father and an Indian mother, she was steeped in racial justice issues from her early years in Oakland and Berkeley, Calif., and wrote in her memoir of memories of the chants, shouts and "sea of legs moving about" at protests. She recalled hearing Shirley Chisholm, the first Black woman to mount a national campaign for president, speak in 1971 at a Black cultural center in Berkeley that she frequented as a young 2016, she became only the second Black woman in the chamber's history.

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ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 54: FOR TECH CHINA DEAL COULD MEAN BIGGER LOSSES

https://www.nytimes.com/2020/01/20/business/economy/trump-us-china-deal-micron-trade-war. html

Copyright number: TX 8-861-157 Effective Date: 2020-03-04

Prompt (taken from article): WASHINGTON — Among the

Output from GPT-4:

66

corporate titans recognized last week by President Trump during a White House signing ceremony for his China trade deal was Sanjay Mehrotra, the chief executive of Micron Technology, whose Idaho semiconductor company is at the heart of Mr. Trump's trade war.

Micron, which makes memory chips for computers and smartphones, is precisely the kind of advanced technology company that the Trump administration views as crucial to maintaining a competitive edge over China. After Micron rebuffed a 2015 takeover attempt by a Chinese state-owned company, it watched with disbelief as its innovations were stolen and copied by a Chinese competitor and its business was blocked from

Actual text from NYTimes:

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CONTENT FROM THE NEW YORK TIMES

67

Example 55: Scientists Feel Optimistic About Goal of Developing Compact Fusion Reactor

https://www.nytimes.com/2020/09/29/climate/nuclear-fusion-reactor.html Copyright number: TX 8 919-710 Effective Date: 2020-11-04

Prompt (taken from article):

Scientists developing a compact version of a nuclear fusion reactor have shown in

Output from GPT-4:

a series of research papers that it should work, renewing hopes that the long-elusive goal of mimicking the way the sun produces energy might be achieved and eventually contribute to the fight against climate change.

Construction of a reactor, called Sparc, which is being developed by researchers at the Massachusetts Institute of Technology and a spinoff company, Commonwealth Fusion Systems, is expected to begin next spring and take three or four years, the researchers and company officials said.

Although many significant challenges remain, the company said construction would be followed by testing and, if successful, building of a power plant that could use fusion energy to generate electricity, beginning in the next decade.

This ambitious timetable is far faster than that of the world's largest fusion power project, a multinational endeavor in Southern France called ITER, for International Thermonuclear Experimental Reactor, which began construction in 2007 and is expected to generate electricity around 2035.

Fusion, in which lightweight atoms are brought together at temperatures of tens of millions of degrees to release energy, has been held out as

Actual text from NYTimes:

a series of research papers that it should work, renewing hopes that the long-elusive goal of mimicking the way the sun produces energy might be achieved and eventually contribute to the fight against climate change.

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Although many significant challenges remain, the company said construction would be followed by testing and, if successful, building of a power plant that could use fusion energy to generate electricity, beginning in the next decade.

This ambitious timetable is far faster than that of the world's largest fusion-power project, a multinational effort in Southern France called ITER, for International Thermonuclear Experimental Reactor. That reactor has been under construction since 2013 and, although it is not designed to generate electricity, is expected to produce a fusion reaction by 2035. Bob Mumgaard, Commonwealth Fusion's chief executive and one of the company's founders, said a goal of the Sparc project was to develop fusion in time for it to play a role in mitigating global warming. "We're really focused on how you can get to fusion power as quickly as possible," he said.

Fusion, in which lightweight atoms are brought together at temperatures of tens of millions of degrees to release energy, has been held out as Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 69 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 56: TRUMP HITS BACK FIRING WITNESSES AFTER ACQUITTAL

https://www.nytimes.com/2020/02/07/us/politics/alexander-vindman-gordon-sondland-fired.html Copyright number: TX 8-863-424 Effective Date: 2020-04-06

Prompt (taken from article):

WASHINGTON — President Trump wasted little time on Friday opening a campaign of retribution against those he blames for his impeachment, firing two of the most prominent witnesses in

Output from GPT-4:

68

the House inquiry against him barely 48 hours after being acquitted by the Senate.

Emboldened by his victory and determined to strike back, Mr. Trump ordered Gordon D. Sondland, the founder of a hotel chain who donated \$1 million to the president's inaugural committee, recalled from his post as the United States ambassador to the European Union on the same day that he had Lt. Col. Alexander S. Vindman, a decorated Iraq war veteran on the National Security Council staff, marched out of the White House by security guards.

The ousters of Mr. Sondland and Colonel Vindman — along with Mr. Vindman's brother, Lt. Col. Yevgeny Vindman, an Army officer who also worked on the National Security Council staff may only presage a broader effort to even accounts with the president's perceived enemies. In the days since his acquittal, the president has spoken of those who "put me through" the impeachment as "evil," "corrupt" and "crooked," while his press secretary declared that those who hurt the president "should pay for it."

"There is no question in the mind of any American why this man's job is over," David Pressman, Colonel Vindman's lawyer, said in a statement. "LTC Vindman was asked to leave for telling the truth. His honor, his commitment to right, frightened the powerful."

The White House did not respond to a request for comment on Friday night, but earlier in the day, Mr. Trump foreshadowed Colonel Vindman's fate. "Well, I'm not happy with him," the president said. "You think I'm supposed to be happy with him? I'm not."

The firings were the first retaliatory steps after the Senate acquitted Mr. Trump on Wednesday of charges that he abused his power and obstructed Congress. The president is said to be weighing other actions, including against other officials who testified in the

Actual text from NYTimes:

the House inquiry against him barely 48 hours after being acquitted by the Senate.

Emboldened by his victory and determined to strike back, Mr. Trump ordered Gordon D. Sondland, the founder of a hotel chain who donated \$1 million to the president's inaugural committee, recalled from his post as the ambassador to the European Union on the same day that Lt. Col. Alexander S. Vindman, a decorated Iraq war veteran on the National Security Council staff, was marched out of the White House by security guards.

The ousters of Mr. Sondland and Colonel Vindman — along with Mr. Vindman's brother, Lt. Col. Yevgeny Vindman, an Army officer who also worked on the National Security Council staff — may only presage a broader effort to even accounts with the president's perceived enemies. In the two days since his acquittal in the Senate, Mr. Trump has railed about those who stood against him, calling them "evil," "corrupt" and "crooked," while his press secretary declared that those who hurt the president "should pay for" it.

Even as he began purging administration officials who testified in the House impeachment inquiry, Mr. Trump assailed a Democratic senator who he had hoped would side with him during the trial but did not and called on the House to "expunge" his impeachment because he deems it illegitimate.

The flurry of actions and outbursts drew quick condemnation from Democrats, who said the president was demonstrating that he feels unleashed, and complicated the politics of impeachment for moderate Republicans who stood by him while arguing that he had learned his lesson and would be more restrained in the future.

"There is no question in the mind of any American why this man's job is over, why this country now has one less soldier serving it at the White House," David Pressman, Colonel Vindman's lawyer, said in a statement. "Lt. Col. Vindman was asked to leave for telling the truth. His honor, his commitment to right, frightened the powerful."

69

EXAMPLE 57: OFFICIALS REBUKE TRUMP ACCUSATIONS OF DELETED VOTES

https://www.nytimes.com/2020/11/12/us/politics/election-officials-contradict-trump.html Copyright number: TX 8-932-123 Effective Date: 2021-01-05

Prompt (taken from article):

WASHINGTON — Hours after President Trump repeated a baseless report that a voting machine system "deleted 2.7 million Trump votes nationwide," he was directly contradicted by a group of federal, state and local election officials, who issued a statement on Thursday declaring flatly that the election "was the most secure

Output from GPT-4:

70

in American history" and that "there is no evidence" any voting systems were compromised.

The rebuke, in a statement by a coordinating council overseeing the integrity of the election, never mentioned Mr. Trump by name. But it amounted to a remarkable corrective to a wave of disinformation that Mr. Trump has been pushing across his Twitter feed.

The statement was distributed by the Department of Homeland Security's Cybersecurity and Infrastructure Security Agency, which is responsible for helping states secure the voting process. Coming directly from one of Mr. Trump's own cabinet agencies, it further isolated the president in his false claims that widespread fraud cost him the election. The officials directly contradicted Mr. Trump's claim, declaring, "While we know there are many unfounded claims and opportunities for misinformation about the process of our elections, we can assure you we have the utmost confidence in the security and integrity of our elections, and you should too. When you have questions, turn to elections officials as trusted voices as they administer elections."

The statement was signed by the members of the Election Infrastructure Government Coordinating Council, which includes top officials from the Cybersecurity and Infrastructure Security Agency, the U.S. Election Assistance Commission and secretaries of state and state election directors from around the country. The group also includes representatives from the voting machine industry, which has often been accused of being slow to admit to technological vulnerabilities in its products.

The statement also noted that all states with close results have paper records of each vote, allowing the ability to go back and count each ballot if necessary. "This is an added benefit for security and resilience. This process allows for the identification and correction of any mistakes or errors," it said.

The statement came as Mr. Trump continued to refuse to concede the election to President-elect Joseph R. Biden

Actual text from NYTimes:

in American history" and that "there is no evidence" any voting systems were compromised.

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The statement was distributed by the Department of Homeland Security's Cybersecurity and Infrastructure Security Agency, which is responsible for helping states secure the voting process. Coming directly from one of Mr. Trump's own cabinet agencies, it further isolated the president in his false claims that widespread fraud cost him the election. The statement also came as a previously unified Republican Party showed signs of cracking on the question of whether to keep backing the president.

Across the country, election officials have said the vote came off smoothly, with no reports of systemic fraud in any state, no sign of foreign interference in the voting infrastructure and no hardware or software failures beyond the episodic glitches that happen in any election. President-elect Joseph R. Biden Jr.'s lead in the popular vote has expanded to more than five million, and he remains on track to win a solid victory in the Electoral College.

The group that issued the statement was the Elections Infrastructure Government Coordinating Council, which includes top officials from the cybersecurity agency, the U.S. Election Assistance Commission and secretaries of state and state election directors from around the country. The group also includes representatives from the voting machine industry, which has often been accused of being slow to admit to technological shortcomings and resistant to creating paper backups.

"While we know there are many unfounded claims and opportunities for misinformation about the process of our elections, we can assure you we have the utmost confidence in the security and integrity of our elections, and you should, too," the officials added in their statement. "When you have questions, turn to elections officials as trusted voices as they administer elections."

CONTENT FROM THE NEW YORK TIMES

71

EXAMPLE 58: POST STAFF QUESTIONED REPORT ON BIDEN

https://www.nytimes.com/2020/10/18/business/media/new-york-post-hunter-biden.html Copyright number: TX 8-926-133 Effective Date: 2020-12-14

Prompt (taken from article):

The New York Post's front-page article about Hunter

Output from GPT-4:

Biden on Wednesday was written mostly by a staff reporter who refused to put his name on it, two Post employees said.

Bruce Golding, a reporter at the Rupert Murdochowned tabloid since 2007, did not allow his byline to be used because he had concerns over the article's credibility, the two Post employees said, speaking on the condition of anonymity out of fear of retaliation. Coming late in a heated presidential campaign, the article suggested that Joseph R. Biden Jr. had used his position to enrich his son Hunter when he was vice president. The Post based the story on photos and documents the paper said it had taken from the hard drive of a laptop purportedly belonging to Hunter

Actual text from NYTimes:

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Example 59: Highly Contagious Variant Is Dominant in New Cases Director of CDC $$\rm Warns$$

https://www.nytimes.com/2021/04/07/us/politics/coronavirus-variants-cdc.html Copyright number: TX 8-983-238 Effective Date: 2021-06-02

Prompt (taken from article):

72

WASHINGTON — A highly infectious variant of the coronavirus that was first identified in Britain has become the most common

Output from GPT-4:

source of new infections in the United States, the director of the Centers for Disease Control and Prevention said on Wednesday. The worrisome development comes as officials and scientists warn of a possible fourth surge of cases.

Federal health officials said in January that the B.1.1.7 variant, which began surging in Britain in December and has since slammed Europe, could become the dominant source of coronavirus infections in the United States, leading to a huge increase in cases and deaths.

At that point, new cases, hospitalizations and deaths were at an all-time high. From that peak, the numbers all **fell** until late February, according to a New York Times database. After several weeks at a plateau, new cases and hospitalizations are increasing again. The average number of new cases has reached nearly 65,000 a day as of Tuesday, concentrated mostly in metro areas in Michigan as well as in the New York City region. That is an increase of 19 percent compared with the figure two weeks ago.

Dr. Rochelle Walensky, the C.D.C. director, who warned last week that she felt a sense of "impending doom," said on Wednesday that 52 of the agency's 64 jurisdictions — which include states, some major cities and territories — are now reporting cases of these so-called "variants of concern," including B.1.1.7.

The sheer number of people in the United States who have been infected with the virus — more than 30 million — and the number of people who have been vaccinated — more than 107 million have received at least one dose — should help slow down the spread of the virus. But the B.1.1.7 variant is more contagious, more likely to lead to severe illness and death, and able to partially evade the antibodies made by the immune system after a coronavirus infection or vaccination.

In addition to spreading more efficiently, there is a concern that the B.1.1.7 variant may also be associated with an increased risk of death compared with other variants, the C.D.C. has said. The agency's studies suggest that vaccines are less effective against a variant that was first identified in South Africa and is circulating in the United States,

Actual text from NYTimes:

source of new infections in the United States, the director of the Centers for Disease Control and Prevention said on Wednesday. The worrisome development comes as officials and scientists warn of a possible fourth surge of infections.

73

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Dr. Rochelle Walensky, the C.D.C. director, who warned last week that she felt a recurring sense of "impending doom," said on Wednesday that 52 of the agency's 64 jurisdictions — which include states, some major cities and territories — are now reporting cases of these so-called "variants of concern," including B.1.1.7.

The number of deaths, however, continue to decline — potentially a sign that mass vaccinations are beginning to protect older Americans and other highly vulnerable populations.

"These trends are pointing to two clear truths," Dr. Walensky said. "One, the virus still has hold on us, infecting people and putting them in harm's way, and we need to remain vigilant. And two, we need to continue to accelerate our vaccination efforts and to take the individual responsibility to get vaccinated when we can."

B.1.1.7, the first variant to come to widespread attention, is about 60 percent more contagious and 67 percent more deadly than the original form of the coronavirus, according to the most recent estimates. The C.D.C. has ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 60: AN OUTBREAK IN THE AMAZON INCLUDES MANY REINFECTIONS

https://www.nytimes.com/2021/03/01/health/covid-19-coronavirus-brazil-variant.html Copyright number: TX 8-977-327 Effective Date: 2021-05-04

Prompt (taken from article):

74

In just a matter of weeks, two variants of the coronavirus have become so familiar that you can hear their inscrutable alphanumeric names regularly uttered on television news.

B.1.1.7, first identified in Britain, has demonstrated the power to spread far and fast. In South Africa, a mutant called B.1.351 can dodge human antibodies, blunting the effectiveness of some vaccines.

Scientists have also had their eye on a third concerning variant that arose in Brazil, called P.1. Research had been slower on P.1 since its discovery in late December, leaving scientists unsure of just how much to worry about it.

"I've been holding my breath," said Bronwyn MacInnis, an epidemiologist at the Broad Institute.

Now three studies offer a sobering history of P.1's meteoric rise in the Amazonian city of Manaus. It most likely arose there in November and then fueled a record-breaking spike of coronavirus cases. It came to dominate the city partly because of an increased contagiousness, the research found.

But it also gained the ability to infect some people who had immunity from previous bouts of Covid-19. And laboratory experiments suggest that P.1 could weaken the protective effect of a Chinese vaccine now in use in Brazil.

The new studies have yet to be published in scientific journals. Their authors caution that findings on cells in laboratories do not always translate to the real world, and they've only begun to understand P.1's behavior.

"The findings apply to Manaus, but I don't know if they apply to other places," said Nuno Faria, a virologist at Imperial College London who helped lead much of the new research.

But even with the mysteries that remain around P.1, experts said it is a variant to take seriously. "It's right to be worried about P.1, and this data gives us the reason why," said William Hanage, an epidemiologist at the Harvard T.H. Chan School of Public Health.

P.1 is now spreading across the rest of Brazil and has been found in 24 other countries. In the United States, the Centers for Disease Control and Prevention has recorded six cases in five states: Alaska, Florida,

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING

CONTENT FROM THE NEW YORK TIMES

75

Output from GPT-4:

Maryland, Minnesota and Oklahoma.

To reduce the risks of P.1 outbreaks and reinfections, Dr. Faria said it was important to double down on every measure we have to slow the spread of the coronavirus. Masks and social distancing can work against P.1. And vaccination can help drive down its transmission and protect those who do get infected from severe disease.

"The ultimate message is that you need to step up all the vaccination efforts as soon as possible," he said. "You need to be one step ahead of the virus." Dr. Faria and his colleagues started tracking the coronavirus when it exploded in Brazil last spring. Manaus, a city of 2 million in the Brazilian Amazon, was hit particularly hard. At its springtime peak, the city's cemeteries were overwhelmed by the bodies of the dead.

But after a peak in late April, Manaus seemed to have gotten past the worst of the pandemic. Some scientists thought that the drop in cases might be a sign that Manaus had reached herd immunity.

Dr. Faria and his colleagues

Actual text from NYTimes:

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Dr.

Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 77 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 61: TRUMP TO HALT WORKER VISAS THROUGH 2020

https://www.nytimes.com/2020/06/22/us/politics/trump-h1b-work-visas.html Copyright number: TX 8-890-563 Effective Date: 2020-08-04

Prompt (taken from article):

WASHINGTON — President Trump on Monday temporarily suspended new work visas and barred hundreds of thousands of foreigners from seeking employment in the United States, part of a broad effort to limit the

Output from GPT-4:

76

entry of immigrants into the country.

In a sweeping order, which will be in place at least until the end of the year, Mr. Trump blocked visas for a wide variety of jobs, including those for computer programmers and other skilled workers who enter the country under the H-1B visa, as well as those for seasonal workers in the hospitality industry, students on work-study summer programs and au pairs who arrive under other auspices.

The order also restricts the ability of American companies with global operations and international companies with U.S. branches to transfer foreign executives and other employees to the United States for months or yearslong stints. And it blocks the spouses of foreigners who are employed at companies in the United States.

Officials said the ban, combined with extending a pause on issuing green cards, would keep as many as 525,000 foreign workers out of the country for the rest of the year.

Actual text from NYTimes:

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CONTENT FROM THE NEW YORK TIMES

77

EXAMPLE 62: AMERICA IS FACING 5 EPIC CRISES AT ONCE

https://www.nytimes.com/2020/06/25/opinion/us-coronavirus-protests.html Copyright number: TX 8-890-563 Effective Date: 2020-08-04

Prompt (taken from article):

There are five gigantic changes happening in America right now. The first is that we are losing the fight against Covid-19. Our behavior doesn't have anything to do with the reality around us. We just got tired so we're giving up.

Second, all Americans, but especially

Output from GPT-4:

white Americans, are undergoing a rapid education on the burdens African-Americans carry every day. This education is continuing, but already public opinion is shifting with astonishing speed.

Third, we're in the middle of a political realignment. The American public is vehemently rejecting Donald Trump's Republican Party. The most telling sign is that the party has even given up on itself, a personality cult whose cult leader is over.

Fourth, a quasi-religion is seeking control of America's cultural institutions. The acolytes of this quasireligion, Social Justice, hew to a simplifying ideology: History is essentially a power struggle between groups, some of which are oppressors and others of which are oppressed. Viewpoints are not explorations of truth; they are weapons that dominant groups use to maintain their place in the power

Actual text from NYTimes:

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ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 63: BOTTOMS UP MAYBE YOU HAD BETTER NOT

https://www.nytimes.com/2020/07/10/well/eat/should-we-be-drinking-less.html Copyright number: TX 8-900-152 Effective Date: 2020-09-02

Prompt (taken from article):

Can a daily drink or two lead to better health?

For many years, the federal government's influential dietary guidelines implied as much, saying there was evidence

Output from GPT-4:

that moderate drinking could lower the risk of heart disease and reduce mortality.

But now a committee of scientists that is helping to update the latest edition of the Dietary Guidelines for Americans is taking a harder stance on alcohol. The committee said in a recent conference call that it plans to recommend that men and women who drink limit themselves to a single serving of wine, beer or liquor per day. Do not drink because you think it will make you healthier, the committee says: It won't. And it maintains that drinking less is generally better for health than drinking more.

That message is a departure from previous guidelines, which since 1980 have defined "moderate" drinking as up to two drinks a day for men and one for women.

Actual text from NYTimes:

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78

79

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 64: PARTNERS IN MISINFORMATION

https://www.nytimes.com/2020/11/20/business/media/steve-bannon-china.html Copyright number: TX 8-932-123 Effective Date: 2021-01-05

Prompt (taken from article):

Dr. Li-Meng Yan wanted to remain anonymous. It was mid-January, and Dr. Yan, a researcher in Hong Kong, had been hearing rumors about a dangerous new virus in mainland China that the government was playing down. Terrified for her personal safety and career, she reached out to her favorite Chinese YouTube host, known for criticizing the Chinese government.

Within days, the host was telling his 100,000 followers that the coronavirus had been deliberately released by the Chinese Communist Party. He wouldn't name the whistle-blower, he said, because officials could make the person "disappear."

By September, Dr. Yan had abandoned caution. She appeared in the United States on Fox News making the unsubstantiated claim to millions that the coronavirus was a bio-weapon manufactured by China.

Overnight, Dr. Yan became a right-wing media sensation, with top advisers to President Trump and conservative pundits hailing her as a hero. Nearly as quickly, her interview was labeled on social media as containing "false information," while scientists rejected her research as a polemic dressed up in jargon.

Her evolution was the product of a

Output from GPT-4:

80

collaboration between two separate but increasingly allied groups that peddle misinformation: a small but active corner of the Chinese diaspora and the highly influential far right in the United States.

Each saw an opportunity in the pandemic to push its agenda. For the diaspora, Dr. Yan and her unfounded claims provided a cudgel for those intent on bringing down China's government. For American conservatives, they played into rising anti-China sentiments and distracted from the Trump administration's bungled handling of the outbreak.

Both sides took advantage of the lack of transparency in China, where the government has refused to share samples of the virus and has resisted a transparent, independent investigation into its origins. And both used the dearth of information to sow fear and distrust of China, scientists and perceived enemies within the United States.

Dr. Yan's trajectory was carefully crafted by Guo Wengui, a fugitive Chinese billionaire, and Steve Bannon, a former adviser to Mr. Trump. They put Dr. Yan on a plane to the United States, gave her a place to stay, coached her on media appearances and helped her secure interviews with popular conservative television hosts like Tucker Carlson and Lou Dobbs, who have shows on Fox. They nurtured her seemingly deep belief that the virus was genetically engineered, uncritically embracing what she provided as proof.

The media outlets that cater to the Chinese diaspora - a jumble of

Actual text from NYTimes:

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Both sides took advantage of the dearth of information coming out of China, where the government has refused to share samples of the virus and has resisted a transparent, independent investigation. Its initial cover-up of the outbreak has further fueled suspicion about the origins of the virus.

An overwhelming body of evidence shows that the virus almost certainly originated in an animal, most likely a bat, before evolving to make the leap into humans. While U.S. intelligence agencies have not ruled out the possibility of a lab leak, they have not found any proof so far to back up that theory.

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They put Dr. Yan on a plane to the United States, gave her a place to stay, coached her on media appearances and helped her secure interviews with popular conservative television hosts like Tucker Carlson and Lou Dobbs, who have shows on Fox. They nurtured her seemingly deep belief that the virus was genetically engineered, uncritically embracing what she provided as proof.

"I said from Day 1, there's no conspiracies," Mr. Bannon said in an interview. "But there are also no coincidences."

Mr. Bannon noted that unlike Dr. Yan, he did not believe the Chinese government "purposely did this." But he has pushed the theory about an accidental leak of risky laboratory research and has been intent on creating a debate about the new coronavirus's origins.

"Dr. Yan is one small voice, but at least she's a voice," he said.

The media outlets that cater to the Chinese diaspora — a jumble of

Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 82 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING

CONTENT FROM THE NEW YORK TIMES

81

Example 65: Industry Ties Pose Possible Conflicts for Scientist Leading Vaccine Team

https://www.nytimes.com/2020/05/20/health/coronavirus-vaccine-czar.html Copyright number: TX 8-886-839 Effective Date: 2020-07-07

Prompt (taken from article):

The chief scientist brought on to lead the Trump administration's vaccine efforts has spent the last several days trying to

Output from GPT-4:

Actual text from NYTimes:

disentangle pieces of his stock portfolio and his intricate ties to big pharmaceutical interests, as critics point to the potential for significant conflicts of interest.

The scientist, Moncef Slaoui, is a venture capitalist and a former long-time executive at GlaxoSmithKline. Most recently, he sat on the board of Moderna, a Cambridge, Mass., biotechnology firm with a \$30 billion valuation that is pursuing a coronavirus vaccine. He resigned when President Trump named him last Thursday to the new post as chief adviser for Operation Warp Speed, the federal drive for coronavirus vaccines and treatments.

Just days into his job, the extent of Dr. Slaoui's financial interests in drug companies has begun to emerge: The value of his stock holdings in Moderna jumped nearly \$2.4 million, to \$12.4 million when the company released preliminary, partial data from an early phase of its candidate vaccine trial that helped send the markets soaring on Monday.

Dr. Slaoui sold his shares on Tuesday, and the administration said he would donate the increased value to cancer research.

But the Moderna stock is just one piece of his pharmaceutical portfolio, much of which is not public. Some ethics and financial securities experts have voiced concerns about the arrangement Dr. Slaoui has with the administration. He is not a government employee, but is instead a contractor, which exempts him from federal disclosure rules that would require him to list his outside positions, stock holdings and other potential conflicts. And the contract position is paid, meaning he is earning income on top of his investments.

The revelations about Dr. Slaoui's financial interests add to the ethical questions surrounding the Trump administration's vaccine effort, which has awarded billions of dollars in no-bid contracts to vaccine companies, including Moderna. Several of the companies, including Moderna and Johnson & Johnson, have said they would sell their vaccines at cost during the pandemic, but have not specified what they will charge afterward. Dr. Slaoui disentangle pieces of his stock portfolio and his intricate ties to big pharmaceutical interests, as critics point to the potential for significant conflicts of interest.

The scientist, Moncef Slaoui, is a venture capitalist and a former longtime executive at GlaxoSmithKline. Most recently, he sat on the board of Moderna, a Cambridge, Mass., biotechnology firm with a \$30 billion valuation that is pursuing a coronavirus vaccine. He resigned when President Trump named him last Thursday to the new post as chief adviser for Operation Warp Speed, the federal drive for coronavirus vaccines and treatments.

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In agreeing to accept the position, Dr. Slaoui did not come on board as a government employee. Instead, he is on a contract, receiving \$1 for his service. That leaves him exempt from federal disclosure rules that would require him to list his outside positions, stock holdings and other potential conflicts. And the contract position is Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 83 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

Example 66: Johnson & Johnson Shots Halted In US Over Rare Clotting Effect

https://www.nytimes.com/2021/04/13/us/politics/johnson-johnson-vaccine-blood-clots-fda-cdc. html

Copyright number: TX 8-983-238 Effective Date: 2021-06-02

Prompt (taken from article):

WASHINGTON — Injections of Johnson & Johnson's coronavirus vaccine

Output from GPT-4:

82

came to a sudden halt across the country on Tuesday after federal health agencies called for a pause in the vaccine's use as they examine a rare blood-clotting disorder that emerged in six recipients.

All six were women between the ages of 18 and 48, and all developed the illness within one to three weeks of vaccination. One woman in Virginia died, and a second woman in Nebraska has been hospitalized in critical condition.

Nearly seven million people in the United States have received Johnson & Johnson shots so far, and roughly nine million more doses have been shipped out to the states, according to data from the Centers for Disease Control and Prevention.

Scientists with the F.D.A. and C.D.C. will jointly examine possible links between the vaccine and the disorder and determine whether the F.D.A. should continue to authorize use of the vaccine for all adults or limit the authorization. An emergency meeting of the C.D.C.'s outside advisory committee has been scheduled for Wednesday.

In the meantime, the F.D.A. is recommending that states pause the use of the Johnson & Johnson vaccine. States and other jurisdictions administering the vaccine should follow that guidance, said Dr. Anne Schuchat, principal deputy director of the C.D.C., and Dr. Peter Marks, director of the Center for Biologics Evaluation and Research at the F.D.A. "We are recommending a pause in the use of this vaccine out of an abundance of caution," Dr. Schuchat and Dr. Marks said in a joint statement. "Right now, these adverse events appear to be extremely rare."

Actual text from NYTimes:

came to a sudden halt across the country on Tuesday after federal health agencies called for a pause in the vaccine's use as they examine a rare blood-clotting disorder that emerged in six recipients.

All six were women between the ages of 18 and 48, and all developed the illness within one to three weeks of vaccination. One woman in Virginia died, and a second woman in Nebraska has been hospitalized in critical condition.

More than seven million people in the United States have received Johnson & Johnson shots so far, and another 10 million doses have been shipped out to the states, according to data from the Centers for Disease Control and Prevention.

"We are recommending a pause in the use of this vaccine out of an abundance of caution," Dr. Peter Marks, the director of the Food and Drug Administration's Center for Biologics Evaluation and Research, and Dr. Anne Schuchat, the principal deputy director of the C.D.C., said in a joint statement. "Right now, these adverse events appear to be extremely rare."

While they framed the move as a recommendation to health practitioners, the impact was immediate. By Tuesday evening, every state, the District of Columbia and Puerto Rico had announced a pause in Johnson & Johnson vaccine injections.

The same went for the U.S. military, federally run vaccination sites, and CVS and Walgreens, two pharmacy giants that participate in the federal program, officials said. Rite Aid, Walmart and Publix also announced that they had paused Johnson & Johnson injections.

Beyond American shores, Johnson & Johnson said it would delay the rollout of its vaccine in Europe, where several countries were poised to start administering it this week. South Africa, devastated by a more contagious variant of the virus that emerged there, also suspended use of the vaccine Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 84 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING

CONTENT FROM THE NEW YORK TIMES

83

EXAMPLE 67: STIMULUS BILL INCLUDES 86 BILLION BAILOUT FOR FAILING UNION PENSION PLANS

https://www.nytimes.com/2021/03/07/business/dealbook/bailout-pensions-stimulus.html Copyright number: TX 8-977-327 Effective Date: 2021-05-04

Prompt (taken from article):

Tucked inside the \$1.9 trillion stimulus

Output from GPT-4:

bill that cleared the Senate on Saturday is an \$86 billion aid package that has nothing to do with the pandemic.

Rather, the \$86 billion is a taxpayer bailout for about 185 union pension plans that are so close to collapse that without the rescue, more than a million retired truck drivers, retail clerks, builders and others could be forced to forgo retirement income.

The bailout targets multiemployer pension plans, which bring groups of companies together with a union to provide guaranteed benefits. All told, about 1,400 of the plans cover about 10.7 million active and retired workers, often in fields like construction or entertainment where the workers move from job to job. As the workforces have aged, and as fewer young workers have joined unions, many of the plans have run out of money. The trend predates the pandemic and is a result of fading union power and industry deregulation.

The provision in the stimulus package would give the weakest plans enough money to pay hundreds of thousands of retirees — a number that will grow in the future — their full pensions for the next 30 years. It does not require the plans to pay back the bailout, freeze accruals or to end the practices that led to their current distress, which

Actual text from NYTimes:

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Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 85 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 68: JOHNSON & JOHNSON EXPECTS RESULTS SOON ON A ONESHOT VACCINE

https://www.nytimes.com/2021/01/13/health/covid-vaccine-johnson-johnson.html Copyright number: TX 8-954-047 Effective Date: 2021-03-22

Prompt (taken from article):

Johnson & Johnson expects to release critical results from its Covid-19 vaccine trial in as little as two weeks — a potential boon in the effort to protect Americans from the coronavirus —

Output from GPT-4:

84

but most likely won't be able to provide as many doses this spring as it promised the federal government because of unanticipated manufacturing delays.

If the vaccine can safely protect people from the coronavirus, as some outside scientists are increasingly confident it will, it would offer big advantages over the two vaccines authorized in the United States. Unlike those products, which require two doses, Johnson & Johnson's could need just one, greatly simplifying logistics for local health departments and clinics struggling to get shots in arms. Its vaccine can also stay stable in a refrigerator for months, whereas the others have to be frozen.

But the encouraging prospect of a third effective vaccine is tempered by apparent lags in the company's production. In the company's \$1 billion contract signed with the federal government in August, Johnson & Johnson pledged to have 12 million doses of its vaccine ready by the end of February, ramping up to a total of 100 million doses by the end of June. Federal officials have been told that the company has fallen as much as two months behind the original production schedule and won't catch up until the end of April, when it was supposed to have delivered more than 60 million doses, according to two people familiar with the situation who were not authorized to discuss it publicly.

Despite the delays, the company said it was confident it could deliver 100 million doses by the end of June. When federal officials announced Johnson & Johnson's contract for 100 million doses last summer, they suggested that the doses would all be available by the end of

Actual text from NYTimes:

but most likely won't be able to provide as many doses this spring as it promised the federal government because of unanticipated manufacturing delays.

If the vaccine can strongly protect people against Covid-19, as some outside scientists expect, it would offer big advantages over the two vaccines authorized in the United States. Unlike those products, which require two doses, Johnson & Johnson's could need just one, greatly simplifying logistics for local health departments and clinics struggling to get shots in arms. What's more, its vaccine can stay stable in a refrigerator for months, whereas the others have to be frozen.

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CONTENT FROM THE NEW YORK TIMES

85

EXAMPLE 69: CHANCE OF CATCHING COVID FROM SURFACES IS LOW

https://www.nytimes.com/2021/04/08/health/coronavirus-hygiene-cleaning-surfaces.html Copyright number: TX 8-983-238 Effective Date: 2021-06-02

Prompt (taken from article):

When the coronavirus began to spread in the United States last spring, many experts warned of the danger

Output from GPT-4:

posed by surfaces. Researchers reported that the virus could survive for days on plastic or stainless steel, and the Centers for Disease Control and Prevention advised that if someone touched one of these contaminated surfaces — and then touched their eyes, nose or mouth — they could become infected. Americans responded in kind, wiping down groceries, quarantining mail and clearing drugstore shelves of Clorox Wipes. Facebook closed two of its offices for a "deep cleaning." New York's Metropolitan Transportation Authority began disinfecting subway cars every night.

But the era of "hygiene theater" may have come to an unofficial end this week, when the C.D.C. updated its surface cleaning guidelines and noted that the risk of contracting the virus from touching a contaminated surface was less than 1 in 10,000.

"People can be affected with the virus that causes Covid-19 through contact with contaminated surfaces and objects," Dr. Rochelle Walensky, the director of

Actual text from NYTimes:

posed by surfaces. Researchers reported that the virus could survive for days on plastic or stainless steel, and the Centers for Disease Control and Prevention advised that if someone touched one of these contaminated surfaces — and then touched their eyes, nose or mouth — they could become infected. Americans responded in kind, wiping down groceries, quarantining mail and clearing drugstore shelves of Clorox wipes. Facebook closed two of its offices for a "deep cleaning." New York's Metropolitan Transportation Authority began disinfecting subway cars every night.

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"People can be affected with the virus that causes Covid-19 through contact with contaminated surfaces and objects," Dr. Rochelle Walensky, the director of Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 87 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 70: HEALTH WORKER HOSPITALIZED AFTER VACCINE

https://www.nytimes.com/2020/12/16/health/covid-pfizer-vaccine-allergic-reaction.html Copyright number: TX 8-940-939 Effective Date: 2021-02-03

Prompt (taken from article):

Two health care workers at the same hospital in Alaska developed concerning reactions just

Output from GPT-4:

minutes after receiving Pfizer's coronavirus vaccine this week, including one staff member who was admitted to the hospital. Both of them are expected to recover, a top official said on Wednesday.

The first worker, a middle-aged woman who had no history of allergies, had an anaphylactic reaction that began 10 minutes after receiving the vaccine at Bartlett Regional Hospital in Juneau on Tuesday, a hospital official said. She experienced a rash over her face and torso, shortness of breath and an elevated heart rate.

Dr. Lindy Jones, the hospital's emergency department medical director, said the worker was first given a shot of epinephrine, a standard treatment for severe allergic reactions. Her symptoms subsided but then re-emerged, and she was treated with steroids and an epinephrine drip.

When doctors tried to stop the drip, her symptoms re-emerged yet again, so the woman was moved to the intensive care unit, observed throughout the night, then weaned off the drip early Wednesday morning, Dr. Jones said.

The second worker received his shot on Wednesday and developed eye puffiness, light-headedness and a scratchy throat 10 minutes after the injection, the hospital said in a statement. He was taken to the emergency room and treated with epinephrine, Pepcid and Benadryl, although hospital officials said he was not considered to have had anaphylaxis. The worker was back to normal within an hour and released.

The hospital,

Actual text from NYTimes:

minutes after receiving Pfizer's coronavirus vaccine this week, including one staff member who was to remain hospitalized until Thursday.

Health officials said that the cases would not disrupt their vaccine rollout plans and that they were sharing the information for the sake of transparency. The first worker, a middle-aged woman who had no history of allergies, had an anaphylactic reaction that began 10 minutes after receiving the vaccine at Bartlett Regional Hospital in Juneau on Tuesday, a hospital official said. She experienced a rash over her face and torso, shortness of breath and an elevated heart rate.

Dr. Lindy Jones, the hospital's emergency department medical director, said the worker was first given a shot of epinephrine, a standard treatment for severe allergic reactions. Her symptoms subsided but then re-emerged, and she was treated with steroids and an epinephrine drip.

When doctors tried to stop the drip, her symptoms re-emerged yet again, so the woman was moved to the intensive care unit, observed throughout the night, then weaned off the drip early Wednesday morning, Dr. Jones said.

Dr. Jones had said earlier Wednesday that the woman was set to be discharged in the evening, but the hospital said late Wednesday that she was remaining another night.

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86

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING

CONTENT FROM THE NEW YORK TIMES

87

EXAMPLE 71: JUSTICE DEPT WAGED SECRET FIGHT TO GET EMAILS OF TIMES REPORTERS

https://www.nytimes.com/2021/06/04/us/politics/times-reporter-emails-gag-order-trump-google. html

Copyright number: TX 9-010-198 Effective Date: 2021-08-09

Prompt (taken from article):

WASHINGTON — In the last weeks of the Trump administration and continuing under President Biden, the Justice Department

Output from GPT-4:

fought a secret legal battle to obtain the email logs of four New York Times reporters in a hunt for their sources, a top lawyer for the newspaper said Friday night.

While the Trump administration never informed The Times about the effort, the Biden administration continued the fight this year, telling a handful of top Times executives about it but imposing a gag order to shield it from public view, said the lawyer, David McCraw, who called the move unprecedented. The gag order prevented the executives from disclosing the government's efforts to seize the records even to the executive editor, Dean Baquet, and other newsroom leaders.

Mr. McCraw said Friday that a federal court had lifted the order, which had been in effect since March 3, freeing him to reveal what had happened. The battle was over an ultimately unsuccessful effort by the Justice Department to seize email logs from Google, which operates The Times's email system, and which had resisted the effort to obtain the information.

The disclosure came two days after the Biden administration notified four reporters at The Times that the Justice Department had during the Trump administration secretly obtained their phone records from

Actual text from NYTimes:

fought a secret legal battle to obtain the email logs of four New York Times reporters in a hunt for their sources, a top lawyer for the newspaper said Friday night.

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The disclosure came two days after the Biden Justice Department notified the four reporters that the Trump administration, hunting for their sources, had in 2020 secretly seized months of their phone records from Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 89 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 72: BIDEN SETS UP 10DAY SPRINT ON BIG ISSUES

https://www.nytimes.com/2021/01/16/us/politics/biden-administration-executive-action-legislation.
html

Copyright number: TX 8-954-047 Effective Date: 2021-03-22

Prompt (taken from article):

WASHINGTON — President-elect Joseph R. Biden Jr., inheriting a collection of crises unlike any in generations, plans to open his administration with dozens of executive directives on top of expansive legislative proposals in a 10-day blitz meant to signal a

Output from GPT-4:

turning point for a nation reeling from disease, economic turmoil, racial strife and now the aftermath of the assault on the Capitol.

Mr. Biden's team has developed a raft of decrees that he can issue on his own authority after the inauguration on Wednesday to begin reversing some of President Trump's most hotly disputed policies. Advisers hope the flurry of action, without waiting for Congress, will establish a sense of momentum for the new president even as the Senate puts his predecessor on trial.

On his first day in office alone, Mr. Biden intends to rescind the travel ban on several predominantly Muslim countries, rejoin the Paris climate change accord, extend pandemic-related limits on evictions and student loan payments, issue a mask mandate on federal property and interstate travel and order agencies to figure out how to reunite children separated from families after crossing the border, according to a memo circulated on Saturday by Ron Klain, his incoming White House chief of staff, and obtained by The New York Times.

The blueprint of executive action comes after Mr. Biden announced that he will push Congress to pass a \$1.9 trillion package of economic

Actual text from NYTimes:

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On his first day in office alone, Mr. Biden intends a flurry of executive orders that will be partly substantive and partly symbolic. They include rescinding the travel ban on several predominantly Muslim countries, rejoining the Paris climate change accord, extending pandemic-related limits on evictions and student loan payments, issuing a mask mandate for federal property and interstate travel and ordering agencies to figure out how to reunite children separated from families after crossing the border, according to a memo circulated on Saturday by Ron Klain, his incoming White House chief of staff, and obtained by The New York Times.

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88

EXAMPLE 73: A TRUMP AIDES BIZARRE WARNING OF CONSPIRACIES AND HIT SQUADS

https://www.nytimes.com/2020/09/14/us/politics/caputo-virus.html Copyright number: TX 8 919-710 Effective Date: 2020-11-04

Prompt (taken from article):

WASHINGTON — The top communications official at the powerful cabinet department in charge of combating the coronavirus made outlandish and false accusations on Sunday that career government scientists were engaging in "sedition" in their handling of the pandemic and that left-wing hit squads were preparing for armed insurrection after the election.

Michael R. Caputo, the assistant secretary of public affairs at the Department of Health and Human Services, accused the Centers for Disease Control and Prevention of harboring a "resistance unit" determined to undermine President Trump, even if that opposition bolsters the Covid-19 death toll.

Mr. Caputo, who has faced intense criticism for leading efforts to warp C.D.C. weekly bulletins to fit Mr. Trump's pandemic narrative, suggested that he personally could be in danger from opponents of the administration. "If you carry guns, buy ammunition, ladies and gentlemen, because it's going to be hard to get," he urged his followers.

He went further, saying his physical health was in question, and his "mental health has definitely failed."

"I don't like being alone in Washington," Mr. Caputo said, describing "shadows on the ceiling in my apartment, there alone, shadows are so long." He also said the mounting number of Covid-19 deaths was taking a toll on him, telling his viewers, "You are not waking up every morning and talking about dead Americans." The United States has lost more than 194,200 people to the virus. Mr. Caputo urged people to attend Trump rallies, but only with masks.

To a certain extent, Mr. Caputo's comments in a video he hosted live on his personal Facebook page were simply an amplified version of remarks that the president himself has made. Both men have singled out government scientists and health officials as disloyal, suggested that the election will not be fairly decided, and insinuated that left-wing groups are secretly plotting to incite violence across the United States.

But Mr. Caputo's

Output from GPT-4:

attacks were more direct, and they came from one of the officials most responsible for shaping communications around the coronavirus.

C.D.C. scientists "haven't gotten out of their sweatpants except for meetings at coffee shops" to plot "how they're going to attack Donald Trump next," Mr. Caputo said. "There are scientists who work for this government who do not want America to get well, not until after Joe Biden is president."

A longtime Trump loyalist with no background in health care, Mr. Caputo, 58, was appointed by the White House to his post in April, at a time when the president's aides suspected the health secretary, Alex M. Azar II, of protecting his public image instead of Mr. Trump's. Mr. Caputo coordinates the messaging of an 80,000-employee department that is at the center of the pandemic response, overseeing the Food and Drug Administration, the C.D.C. and the National Institutes of Health.

Actual text from NYTimes:

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89

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ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 74: CHINA GOT SOME AID FOR FIRMS IN THE US

https://www.nytimes.com/2020/08/02/us/politics/virus-china-ppp-small-business-loans.html Copyright number: TX 8-913-823 Effective Date: 2020-10-13

Prompt (taken from article):

WASHINGTON — President Trump has blamed China for the coronavirus pandemic and the ensuing economic crisis,

Output from GPT-4:

90

but as the White House looks to stabilize small businesses in the United States, the rescue effort has had an unintended beneficiary: Chinese companies.

Millions of dollars of American taxpayer money have flowed to China from the \$660 billion Paycheck Protection Program that was created in March to be a lifeline for struggling small businesses in the United States. But because the economic relief legislation allowed American subsidiaries of foreign firms to receive the loans, a substantial chunk of the money went to America's biggest economic rival, a new analysis shows.

According to a review of publicly available loan data by the strategy consulting firm Horizon Advisory, \$192 million to \$419 million has gone to more than 125 companies that Chinese entities own or invest in. Many of the loans were quite sizable; at least 32 Chinese companies received loans worth more than \$1 million, with those totaling as much as \$180

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https://www.nytimes.com/2020/09/25/us/politics/rbg-retirement-obama.html Copyright number: TX 8 919-710 Effective Date: 2020-11-04

Prompt (taken from article):

When Justice Ruth Bader Ginsburg joined President Barack Obama for lunch in his private dining room in July 2013, the White House sought to keep the event quiet — the meeting called for discretion. Mr. Obama had asked his White House counsel, Kathryn Ruemmler, to set up the lunch so he could build a closer rapport with the justice, according to two people briefed on the conversation. Treading cautiously, he did not directly bring up the subject of retirement to Justice Ginsburg, at 80 the Supreme Court's oldest member and a two-time cancer patient.

He did, however, raise the looming 2014 midterm elections and how

Output from GPT-4:

Democrats might lose control of the Senate. Implicit in that conversation was the concern motivating his lunch invitation — the possibility that if the Senate flipped, he would lose a chance to appoint a younger, liberal judge who could hold on to the seat for decades.

But the effort did not work, just as an earlier attempt by Senator Patrick Leahy, the Vermont Democrat who was then Judiciary Committee chairman, had failed. Justice Ginsburg left Mr. Obama with the clear impression that she was committed to continuing her work on the court, according to those briefed.

In an interview a year later, Justice Ginsburg deflected questions about the purpose of the lunch. Pressed on what Mr. Obama might think about her potential retirement, she said only, "I think he would agree with me that it's a question for my own good judgment."

With Justice Ginsburg's death last week, Democrats are in a political battle, as Republicans rush to fill her seat and cement the court's conservative tilt. Mr. Obama clearly felt

Actual text from NYTimes:

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91

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With Justice Ginsburg's death last week, Democrats are in a major political battle, as Republicans race to fill her seat and cement the court's conservative tilt.

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Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 93 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 76: A DUTCH MACHINE IS CRUCIAL FOR CHIPS CHINA CANT BUY IT

https://www.nytimes.com/2021/07/04/technology/tech-cold-war-chips.html Copyright number: TX 9-021-350 Effective Date: 2021-09-02

Prompt (taken from article):

SAN FRANCISCO — President Biden and many law makers in Washington are worried these days about computer chips and China's

Output from GPT-4:

92

ambitions with the foundational technology.

But a massive machine sold by a Dutch company has emerged as a key lever for policymakers — and illustrates how any country's hopes of building a completely self-sufficient supply chain in semiconductor technology are unrealistic.

The machine is made by ASML Holding, based in Veldhoven. Its system uses a different kind of light to define ultrasmall circuitry on chips, packing more performance into the small slices of silicon. The tool, which took decades to develop and was introduced for high-volume manufacturing in 2017, costs more than \$150 million. Shipping it to customers requires 40 shipping containers, 20 trucks and three Boeing 747s.

The complex machine is widely acknowledged as necessary for making the most advanced chips, an ability with geopolitical implications. The Trump administration successfully lobbied the Dutch government to block shipments of such a machine to China in 2019, and the Biden administration has shown no signs of

Actual text from NYTimes:

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https://www.nytimes.com/2020/06/24/technology/facial-recognition-arrest.html Copyright number: TX 8-890-563 Effective Date: 2020-08-04

Prompt (taken from article):

Note: In response to this article, the Wayne County prosecutor's office said that Robert Julian-Borchak Williams could have the case and his fingerprint data expunged. "We apologize," the prosecutor, Kym L. Worthy, said in a statement, adding, "This does not in any way make up for the hours that Mr. Williams spent in jail."

On a Thursday afternoon in January, Robert Julian-Borchak Williams was in his office at an automotive supply company when he got a call from the

Output from GPT-4:

Detroit Police Department telling him to come to the station to be arrested. He thought at first that it was a prank.

An hour later, when he pulled into his driveway in a quiet subdivision in Farmington Hills, Mich., a police car pulled up behind, blocking him in. Two officers got out and handcuffed Mr. Williams on his front lawn, in front of his wife and two young daughters, who were distraught. The police wouldn't say why he was being arrested, only showing him a piece of paper with his photo and the words "felony warrant" and "larceny."

His wife, Melissa, asked where he was being taken. "Google it," she recalls an officer replying.

The police drove Mr. Williams to a detention center. He had his mug shot, fingerprints and DNA taken, and was held overnight. Around noon on Friday, two detectives took him to an interrogation room and placed three pieces of paper on the

Actual text from NYTimes:

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93

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ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 78: BIDEN POLLING AHEAD IN 4 BATTLEGROUNDS

https://www.nytimes.com/2020/11/01/us/politics/biden-trump-poll-florida-pennsylvania-wisconsin.
html

Copyright number: TX 8-932-123 Effective Date: 2021-01-05

Prompt (taken from article):

[Joe Biden has won the 2020 U.S. presidential election. Read our story] Joseph R. Biden Jr. holds a clear advantage over President Trump across four of the most important

Output from GPT-4:

94

presidential swing states, a new poll shows, bolstered by the support of voters who did not participate in the 2016 election and who now appear to be turning out in large numbers to cast their ballots, mainly for the Democrat.

Mr. Biden, the former vice president, is ahead of Mr. Trump in the Northern battlegrounds of Wisconsin and Pennsylvania, as well as in the Sun Belt states of Florida and Arizona, according to a poll of likely voters conducted by The New York Times and Siena College. His strength is most pronounced in Wisconsin, where he has an outright majority of the vote and leads Mr. Trump by 11 points, 52 percent to 41 percent.

Mr. Biden's performance across the electoral map appears to put him in a stronger position heading into Election Day than any presidential candidate since at least 2008, when in the midst of a global economic crisis Barack Obama captured the White House with 365 Electoral College votes.

In the closing days of the campaign, Mr. Biden has a modest but not insurmountable lead in Florida, where he is ahead of Mr. Trump by three points, 47 percent to 44 percent, within the margin of error. He leads by six points in both Arizona and Pennsylvania.

In all four states, Mr. Biden is performing better among likely voters than Hillary Clinton did four years ago. He is also ahead of Mr. Trump

Actual text from NYTimes:

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Mr. Trump's apparent weakness in many of the country's largest electoral prizes leaves him with a narrow path to the 270 Electoral College votes required to claim victory, short of a major upset or a systemic error in opinion polling surpassing even the missteps preceding the 2016 election. Should Mr. Biden's lead hold in three of the four states tested in the survey, it would almost certainly be enough to win, and if he were to carry Florida, he would most likely need to flip just one more large state that Mr. Trump won in 2016 to clinch the presidency.

In the closing days of the campaign, Mr. Biden has a modest advantage in Florida, where he is ahead of Mr. Trump by three points, 47 percent to 44 percent, a lead that is within the margin of error. He leads by six points in both Arizona and Pennsylvania. EXAMPLE 79: PANDEMIC HAS AMERICANS SNAPPING UP BICYCLES CREATING A SHORTAGE

https://www.nytimes.com/2020/05/18/nyregion/bike-shortage-coronavirus.html Copyright number: TX 8-886-839 Effective Date: 2020-07-07

Prompt (taken from article):

Some bicycle shops in Brooklyn are selling twice as many bikes as usual and drawing blocklong lines of customers. A chain of shops in Phoenix is selling three times the number of bikes it typically does. A retailer in Washington, D.C., sold all its entry-level bikes by the end of

Output from GPT-4:

April and has fielded more preorders than ever in its 50-year history.

As the coronavirus pandemic shrinks life in major American cities — limiting pastimes and discouraging use of buses and subways — hundreds of thousands of Americans are flocking to one of the most basic forms of mobility: the bicycle.

In March, nationwide sales of bicycles, equipment and repair services nearly doubled compared with the same period last year, according to the N.P.D. Group, a market research company. Sales of commuter and fitness bikes in the same month increased 66 percent, leisure bikes jumped 121 percent, children's bikes went up 59 percent and electric bikes rose 85 percent.

By the end of April, many stores and distributors had sold out of low-end consumer bikes. Now, the United States is facing a severe bicycle shortage as global supply chains, disrupted by the coronavirus outbreak, scramble to meet the surge in demand.

"The numbers are unprecedented," said Ryan Zagata, president of Brooklyn Bicycle Company, where sales have soared by more than 600 percent this year compared with the same period in 2019.

Actual text from NYTimes:

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By the end of April, many stores and distributors had sold out of low-end consumer bikes. Now, the United States is facing a severe bicycle shortage as global supply chains, disrupted by the coronavirus outbreak, scramble to meet the surge in demand.

"I have never seen anything remotely approaching this," said Ryan Zagata, president of Brooklyn Bicycle Company, where sales have soared by more than 600 percent this year compared with the same period in 2019. ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 80: FKA TWIGS ACCUSES AN ACTOR OF ABUSE

https://www.nytimes.com/2020/12/11/arts/music/fka-twigs-shia-labeouf-abuse.html Copyright number: TX 8-940-939 Effective Date: 2021-02-03

Prompt (taken from article):

Just after Valentine's Day in 2019, the musician FKA twigs was in a car speeding toward Los Angeles. At the wheel was her boyfriend, the actor Shia LaBeouf. He was driving recklessly, she said in a lawsuit filed on Friday, removing his seatbelt and threatening to crash unless she professed her love for him.

They were returning from the desert, where Mr. LaBeouf, the star of "Transformers," had raged at her throughout the trip, FKA twigs said in the lawsuit, once waking her up in the middle of the night, choking her. After she begged to be let out of the car, she said he pulled over at a gas station and she took her bags from the trunk. But Mr.

Output from GPT-4:

LaBeouf followed, and assaulted her, throwing her against the car while screaming in her face, according to the suit. He then forced her back into the car.

The gas station incident is at the heart of the lawsuit that says Mr. LaBeouf, 34, abused FKA twigs physically, emotionally and mentally many times in a relationship that lasted just short of a year. Her aim in coming forward, she said in an interview, was to explain how even a critically acclaimed artist with money, a home and a strong network of supporters could be caught in such a cycle.

The lawsuit, filed in Los Angeles Superior Court, says that Mr. LaBeouf knowingly gave FKA twigs, born Tahliah Debrett Barnett, a sexually transmitted disease. It accuses him of "relentless abuse," including sexual battery, assault and infliction of emotional distress.

In an email to The New York Times,Mr. LaBeouf said that "many of these allegations are not true," but he added that he owed the women "the opportunity to air their statements publicly and accept accountability for those things I have done."

He also sent an email to The Times saying that he was in a 12-step program and in therapy. "I'm not in any position to tell anyone how my behavior made them feel," he said in the email. "I have no excuses for my alcoholism or aggression, only rationalizations. I have been abusive to myself and everyone around me for years. I have a history of hurting the people closest to me. I'm ashamed of that history and am sorry to those I hurt. There is nothing else I can really say."

Actual text from NYTimes:

LaBeouf followed, and assaulted her, throwing her against the car while screaming in her face, according to the suit. He then forced her back in the car. The gas station incident is at the heart of the lawsuit that says Mr. LaBeouf, 34, abused FKA twigs physically, emotionally and mentally many times in a relationship that lasted just short of a year. Her aim in coming forward, she said in an interview, was to explain how even a critically acclaimed artist with money, a home and a strong network of supporters could be caught in such a cycle.

"I'd like to be able to raise awareness on the tactics that abusers use to control you and take away your agency," FKA twigs, 32, born Tahliah Debrett Barnett, said.

Mr. LaBeouf responded Thursday to the concerns raised by Ms. Barnett, and a second former girlfriend who has accused him of abusive behavior, in an email that broadly addressed his conduct.

"I'm not in any position to tell anyone how my behavior made them feel," he said in an email to The New York Times. "I have no excuses for my alcoholism or aggression, only rationalizations. I have been abusive to myself and everyone around me for years. I have a history of hurting the people closest to me. I'm ashamed of that history and am sorry to those I hurt. There is nothing else I can really say." The lawsuit, filed in Los Angeles Superior Court, says that Mr. LaBeouf knowingly gave Ms. Barnett a sexually transmitted disease. It accuses him of "relentless abuse," including sexual battery, assault and infliction of emotional distress.

96

EXAMPLE 81: ERRORS INCONSISTENCIES AND DOUBTS ABOUT HOW PRECISE RESULTS WILL BE

https://www.nytimes.com/2020/02/06/upshot/iowa-caucuses-errors-results.html Copyright number: TX 8-863-424 Effective Date: 2020-04-06

Prompt (taken from article):

Results from the Iowa Democratic caucuses were delayed by "quality control checks" on Monday night. Days later, quality control issues have not been resolved.

The results released by the Iowa Democratic Party on Wednesday were riddled with inconsistencies and other flaws. According to a New York Times analysis,

Output from GPT-4:

more than 100 precincts reported results that were internally inconsistent, that were missing data or that were not possible under the complex rules of the Iowa caucuses.

In some cases, vote tallies do not add up. In others, precincts are shown allotting the wrong number of delegates to certain candidates. And in at least a few cases, the Iowa Democratic Party's reported results do not match those reported by the precincts.

Some of these inconsistencies may prove to be innocuous, and they do not indicate an intentional effort to compromise or rig the result. There is no apparent bias in favor of the leaders Pete Buttigieg or Bernie Sanders, meaning the overall effect on the winner's margin may be small.

But not all of the errors are minor, and they raise questions about whether the public will ever get a completely precise account of the Iowa results. With Mr. Sanders closing to within 0.1 percentage points with 97 percent of 1,765 precincts reporting, the race could easily flip as more data is examined.

The errors suggest that many Iowa caucus leaders struggled to follow the rules of their party's

Actual text from NYTimes:

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97

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Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 99 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 82: RENTERS OUT OF WORK MONEY AND VERY SOON THEIR HOMES

https://www.nytimes.com/2020/05/27/us/coronavirus-evictions-renters.html Copyright number: TX 8-886-839 Effective Date: 2020-07-07

Prompt (taken from article):

EUCLID, Ohio — The United States, already wrestling with an economic collapse not seen in a generation, is facing a wave of evictions as government relief payments and legal protections

Output from GPT-4:

run out for millions of out-of-work Americans who have little financial cushion and few choices when looking for new housing.

The hardest hit are tenants who had low incomes and little savings even before the pandemic, and whose housing costs ate up more of their paychecks. They were also more likely to work in industries where job losses have been particularly severe.

Temporary government assistance has helped, as have government orders that put evictions on hold in many cities. But evictions will soon be allowed in about half of the states, according to Emily A. Benfer, a housing expert and associate professor at Columbia Law School who is tracking eviction policies.

"I think we will enter into a severe renter crisis and very quickly," Professor Benfer said. Without a new round of government intervention, she added, "we will have an avalanche of evictions across the country."

That means more and more families may soon experience the dreaded eviction notice on the front door, the knock from sheriff's deputies, the belongings piled up on the curb. They will face displacement at a time when people are still being urged to stay at home to keep themselves and their communities

Actual text from NYTimes:

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98

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING

CONTENT FROM THE NEW YORK TIMES

99

EXAMPLE 83: BRAZIL ACCUSES INVESTIGATIVE REPORTER OF CYBERCRIMES

https://www.nytimes.com/2020/01/21/world/americas/glenn-greenwald-brazil-cybercrimes.html Copyright number: TX 8-861-157 Effective Date: 2020-03-04

Prompt (taken from article):

 $\rm RIO$ DE JANEIRO — Federal prosecutors in Brazil on Tuesday charged the American journalist Glenn Greenwald with cybercrimes for his

Output from GPT-4:

role in the spreading of cellphone messages that have embarrassed prosecutors and tarnished the image of an anti-corruption task force.

In a criminal complaint made public on Tuesday, prosecutors in the capital, Brasília, accused Mr. Greenwald of being part of a "criminal organization" that hacked into the cellphones of several prosecutors and other public officials last year.

Mr. Greenwald, an ardent critic of Brazil's far right president, Jair Bolsonaro, is a deeply polarizing figure in Brazil, where his work is lionized by leftists and condemned as partisan and heavy handed by officials in the Bolsonaro administration.

The news organization Mr. Greenwald co-founded, The Intercept Brasil, published articles last year based on the leaked cellphone messages that raised questions about the integrity and the motives of key members of Brazil's justice system.

The articles cast doubt on the impartiality of a former judge, Sergio Moro, and of some of the prosecutors who worked on a corruption investigation that landed several powerful political figures in prison.

Among those charged in connection with the corruption investigation was former President Luiz Inácio Lula da Silva, a popular leftist leader.

Mr. Greenwald moved to Brazil in 2005 after meeting David Miranda, a Brazilian man he later married and who became a federal congressman last year.

Mr. Greenwald first became widely known for his role in the release of classified national security documents leaked by the former National Security Agency contractor Edward J. Snowden in 2013. He co-founded The Intercept Brasil in 2016.

After The Intercept Brasil began publishing its exposé on the justice system, members of the Bolsonaro administration accused Mr. Greenwald of being part of a criminal conspiracy.Mr. Greenwald vehemently denied the accusations and continued to publish damaging articles about the administration and the justice system.

In a statement Mr. Greenwald called the charges against him "an obvious attempt to attack a free press in retaliation for the revelations we reported about Minister Moro

Actual text from NYTimes:

role in bringing to light cellphone messages that have embarrassed prosecutors and tarnished the image of an anticorruption task force.

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The articles cast doubt on the impartiality of a former judge, Sérgio Moro, and of some of the prosecutors who worked on a corruption investigation that landed several powerful political and business figures in prison.

Among those charged in connection with the corruption investigation was a former president, Luiz Inácio Lula da Silva, a popular leftist whose conviction paved the way for the election of Mr. Bolsonaro. Mr. Moro was the judge who handled that case, and he is now Mr. Bolsonaro's minister of justice.

The charges against Mr. Greenwald raise concerns among journalists and advocates for a free press because journalists often rely on confidential or leaked information, sometimes obtained by whistle-blowers or hackers. Mr. Greenwald has been part of a team that won some of the most important prizes in journalism — the George Polk Award and the Pulitzer Prize for public service — for reporting on documents that described government surveillance. The documents were passed on to him by Edward J. Snowden, a former contractor with the National Security Agency of the United States who later faced espionage charges in connection with the leak.

In a statement Mr. Greenwald called the charges "an obvious attempt to attack a free press in retaliation for the revelations we reported about Minister Moro ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING

CONTENT FROM THE NEW YORK TIMES

101

EXAMPLE 84: TRUMPS CHOICE OF KILLING STUNNED DEFENSE OFFICIALS

https://www.nytimes.com/2020/01/04/us/politics/trump-suleimani.html Copyright number: TX 8-861-157 Effective Date: 2020-03-04

Prompt (taken from article):

WASHINGTON — In the chaotic days leading to the death

Output from GPT-4:

of Maj. Gen. Qassim Suleimani of Iran in an American drone strike, top military officials put the option of killing him — which they viewed as the most extreme response to recent Iranian-led violence in Iraq — on the menu they presented to President Trump.

They didn't think he would take it. In the wars waged since the Sept. 11, 2001, attacks, Pentagon officials have often offered improbable options to presidents to make other possibilities appear more palatable.

After initially rejecting the Suleimani option on Dec. 28 and authorizing airstrikes on an Iranianbacked Shiite militia group instead, a few days later Mr. Trump watched, fuming, as television reports showed Iranian-backed attacks on the American Embassy in Baghdad, according to Defense Department and administration officials.

By late Thursday, the president had gone for the extreme option. Top Pentagon officials were stunned. Mr. Trump made the decision, senior officials said on Friday, despite disputes in the administration about the significance of what some officials said was a new stream of intelligence that warned of threats to American embassies, consulates and military personnel in Syria, Iraq and Lebanon. General Suleimani had just completed a tour of his forces in Syria, Lebanon and Iraq, and was planning an "imminent" attack that could claim hundreds of lives, those officials said.

"Days, weeks," said Gen. Mark A. Milley, the chairman of the Joint Chiefs of Staff, when asked how imminent any attacks

Actual text from NYTimes:

of Maj. Gen. Qassim Suleimani, Iran's most powerful commander, top American military officials put the option of killing him — which they viewed as the most extreme response to recent Iranian-led violence in Iraq — on the menu they presented to President Trump.

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Case 1:20 NEVI MAR BESEX SMOTTEN/OF DECLIMENTO 2008 OF 127

102

TIMES

EXAMPLE 85: US STRIKE IN IRAQ KILLS COMMANDER OF IRANIAN FORCE

http://www.nytimes.com/2020/01/02/world/middleeast/qassem-soleimani-iraq-iran-attack.html Copyright number: TX 8-861-157 Effective Date: 2020-03-04

Prompt (taken from article):

WEST PALM BEACH, Fla. — Iran's top security and intelligence commander was killed early Friday in a drone strike at Baghdad International Airport that was authorized by President Trump, American officials said.

The commander, Maj. Gen. Qassim

Output from GPT-4:

Suleimani, who led the powerful Quds Force of the Islamic Revolutionary Guards Corps, was killed along with several officials from Iraqi militias backed by Tehran when an American MQ-9 Reaper drone fired missiles into a convoy leaving the airport.

General Suleimani was the architect of nearly every significant operation by Iranian intelligence and military forces over the past two decades, and his death was a staggering blow for Iran at a time of escalating tensions with the United States.

The strike was also a serious escalation of Mr. Trump's growing confrontation with Tehran, one that began with the death of an American contractor in Iraq in late December.

In Iran, the leadership convened an emergency security meeting. And the country's supreme leader, Ayatollah Ali Khamenei, issued a statement calling for three days of public mourning and then retaliation.

"His departure to God does not end his path or his mission," the supreme leader said, "but a forceful revenge awaits the criminals who have his blood and the blood of the other martyrs last night on their hands."

United States officials were braced for potential Iranian retaliatory attacks, possibly including cyberattacks and terrorism, on American interests and allies.

Israel, too, was preparing for Iranian strikes.

Actual text from NYTimes:

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Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 104 of 127 ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES 103

EXAMPLE 86: SOME REPUBLICANS SEE TRUMP SINKING AND TAKING SENATE WITH HIM

https://www.nytimes.com/2020/04/25/us/politics/trump-election-briefings.html Copyright number: TX 8-884-515 Effective Date: 2020-06-04

Prompt (taken from article):

WASHINGTON — President Trump's erratic handling of the coronavirus outbreak, the worsening economy and a cascade of ominous public and private polling have Republicans increasingly nervous that they are

Output from GPT-4:

at risk of losing the presidency and the Senate if Mr. Trump does not put the nation on a radically improved course.

The scale of the G.O.P.'s challenge has crystallized in the last week. With 26 million Americans now having lost their jobs to the pandemic, Mr. Trump's standing in states that he carried in 2016 looks increasingly wobbly: New surveys show him trailing significantly in battleground states like Michigan and Pennsylvania, and he is even narrowly behind in must-win Florida.

Democrats raised substantially more money than Republicans did in the first quarter in the most pivotal congressional races, according to recent campaign finance reports. And while Mr. Trump is well ahead in money compared with the presumptive Democratic nominee, Joseph R. Biden Jr., Democratic donors are only beginning to focus on the general election, and several super PACs plan to spend heavily on behalf of him and the party.

Perhaps most significantly, Mr. Trump's single best advantage as an incumbent — his access to the bully pulpit — has effectively become a platform for selfsabotage.

His daily news briefings on the coronavirus outbreak are inflicting grave damage on his political standing, Republicans believe, and his recent remarks about combating the virus with sunlight and disinfectant were a breaking point for a number of senior party officials.

On Friday, Mr. Trump conducted only a short briefing and took no questions, a format that a senior administration official said was being discussed as the best option for the president going forward. Publicly, Mr. Trump

Actual text from NYTimes:

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EXAMPLE 87: HOW CAN WE ACHIEVE HERD IMMUNITY EXPERTS ARE QUIETLY UPPING THE NUMBER

https://www.nytimes.com/2020/12/24/health/herd-immunity-covid-coronavirus.html Copyright number: TX 8-940-939 Effective Date: 2021-02-03

Prompt (taken from article):

At what point does a country achieve herd immunity? What portion of the population must acquire resistance to the coronavirus, either through infection or vaccination, in order for the disease to fade away and life to return to normal?

Since the start of the pandemic, the figure that many epidemiologists have offered has been 60 to 70 percent. That range is still cited by the World Health Organization and is often repeated during discussions of the future course of the disease.

Although

104

Output from GPT-4:

it is impossible to know with certainty what the limit will be until we reach it and transmission stops, recently, a figure to whom millions have turned for answers — Dr. Anthony S. Fauci, an adviser to both the Trump administration and the incoming Biden administration — has begun incrementally raising his herd-immunity estimate.

In the pandemic's early days, Dr. Fauci tended to cite the same 60 to 70 percent estimate that most experts did. About a month ago, he began saying "70, 75 percent" in television interviews. And last week, in an interview with CNBC News, he said "75, 80, 85 percent" and "75 to 80-plus percent."

In a telephone interview the next day, Dr. Fauci acknowledged that he had slowly but deliberately been moving the goal posts. He is doing so, he said, partly based on new science, and partly on his gut feeling that the country is finally ready to hear what he really thinks.

Hard as it may be to hear, he said, he believes that it may take close to 90 percent immunity to bring the virus to a halt — almost as much as is needed to stop a measles outbreak.

Asked about Dr. Fauci's conclusions, prominent epidemiologists said that he might be proven right. The early range of 60 to 70 percent was almost undoubtedly too low, they said, and the virus is becoming more transmissible, so it will take greater herd immunity to stop it.

Dr. Fauci's statements come at a time when more than a third of Americans say in polls that they do not want to take a vaccine, a stance that if unchanged could undermine the collective immunity that is needed to stop the pandemic.Dr. Fauci said that he may have been moving the goal posts

Actual text from NYTimes:

it is impossible to know with certainty what the limit will be until we reach it and transmission stops, having a good estimate is important: It gives Americans a sense of when we can hope to breathe freely again. Recently, a figure to whom millions of Americans look for guidance — Dr. Anthony S. Fauci, an adviser to both the Trump administration and the incoming Biden administration — has begun incrementally raising his herd-immunity estimate.

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Dr. Fauci said that weeks ago, he had hesitated to publicly raise his estimate because many Americans seemed hesitant about vaccines, which they would need to accept almost universally in order for the country to achieve herd immunity.

Now that some polls are showing that many more Americans are ready, even eager, for vaccines, he said he felt he could deliver the tough message that the return to normal might take longer than anticipated.

"When polls said only about half of all Americans would take a vaccine, I was saying herd immunity would take 70 to 75 percent," Dr. Fauci said Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 107 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 88: SCIENTISTS FIND HINTS OF LIFE IN CLOUDS OF VENUS

https://www.nytimes.com/2020/09/14/science/venus-life-clouds.html Copyright number: TX 8 919-710 Effective Date: 2020-11-04

Prompt (taken from article):

High in the toxic atmosphere of the planet

Output from GPT-4:

106

Venus, astronomers on Earth have discovered signs of what might be life.

If the discovery is confirmed by additional telescope observations and future space missions, it could turn the gaze of scientists to one of the brightest objects in the night sky. Venus, named after the Roman goddess of beauty, roasts at temperatures of hundreds of degrees and is cloaked by clouds that contain droplets of corrosive sulfuric acid. Few have focused on the rocky planet as a habitat for something living.

Instead, for decades, scientists have sought signs of life elsewhere, usually peering outward to Mars and more recently at Europa, Enceladus and other icy moons of the giant planets.

The astronomers who reported the finding on Monday have not collected specimens of Venusian microbes, nor have they snapped any pictures of them. But with powerful telescopes, they have detected a chemical — phosphine — in the high clouds of Venus. After much analysis, the scientists assert that something now alive is the only explanation for the chemical's source.

Some researchers question this hypothesis, and they suggest instead that the gas could result from unexplained atmospheric or geologic processes on a planet that remains mysterious. But the finding will also encourage some planetary scientists to ask whether humanity has overlooked a planet that may have once been more Earthlike than any other world in our solar system.

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CONTENT FROM THE NEW YORK TIMES

Example 89: Mexico Moves to Make Marijuana Legal as Canada Has Done

https://www.nytimes.com/2021/03/10/world/americas/mexico-cannabis-bill.html Copyright number: TX 8-977-327 Effective Date: 2021-05-04

Prompt (taken from article):

MEXICO CITY — Lawmakers in Mexico approved a bill Wednesday night to legalize recreational marijuana, a milestone for the

Output from GPT-4:

country, which is in the throes of a drug war and could become the world's largest cannabis market, leaving the United States between two pot-selling neighbors.

The 316-to-129 vote in Mexico's lower house, the Chamber of Deputies, came more than two years after the Mexican Supreme Court ruled that the country's ban on recreational marijuana was unconstitutional and more than three years after the country legalized medicinal cannabis.

The chamber approved the bill in general terms Wednesday evening before moving on to a lengthy discussion of possible revisions introduced by individual lawmakers. In its final form, though, the measure is widely expected to sail through the Senate before being sent to President Andrés Manuel López Obrador, who has signaled support for legalization.

The measure, which is likely to face legal challenges from opponents, would allow adults to smoke marijuana and, with a permit, grow a small number of cannabis plants at home. It would also grant licenses for producers — from small farmers to commercial growers — to cultivate and sell the crop.

"Today we are in a historic moment," said Simey Olvera, a lawmaker with the governing Morena party. "With this, the false belief that cannabis is part of Mexico's serious health problems is left behind."

If enacted, Mexico would join Canada and Uruguay in a small but growing list of countries that have legalized marijuana in the Americas, adding further momentum to the legalization movement in the region. In the United States, Democrats in the Senate have also promised to scrap federal prohibition of the drug this year.

For "Mexico, given its size and its worldwide reputation for being damaged by the drug war, to take a step of this magnitude is enormously significant," said Marielena Hincapié, an executive director at the National Immigration Law Center. "Mindsets are changing."

The law would also be a shift from the policies of many of Mexico's cartel-fighting presidents, who have for years railed against drug use and have stayed firm in their opposition even as many of their Latin American counterparts have changed course. The bill's passage is a coup for Mr.López Obrador, who has

Actual text from NYTimes:

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CONTENT FROM THE NEW YORK TIMES

109

Example 90: Less Sleep in Middle Age May Raise Dementia Risk

https://www.nytimes.com/2021/04/20/health/sleep-dementia-risk.html Copyright number: TX 8-983-238 Effective Date: 2021-06-02

Prompt (taken from article):

Could getting too little sleep increase your chances of developing dementia?

For years, researchers have pondered this and other questions about how sleep relates to cognitive decline. Answers

Output from GPT-4:

have been elusive because it is hard to know if insufficient sleep is a symptom of the brain changes that underlie dementia — or if it can actually help cause those changes.

Now, a large new study reports some of the most persuasive findings yet to suggest that people who don't get enough sleep in their 50s and 60s may be more likely to develop dementia when they are older. The research, published Tuesday in the journal Nature Communications, has limitations but also several strengths. It followed nearly 8,000 people in Britain for about 25 years, beginning when they were 50 years old. It found that those who consistently reported sleeping six hours or less on an average weeknight were about 30 percent more likely than people who regularly got seven hours sleep (defined as "normal" by the study) to be diagnosed with dementia nearly three decades later.

"It would be really unlikely that almost three decades earlier this sleep was a symptom of dementia, so it's a great study in providing strong evidence that sleep is really a risk factor," said Dr. Kristine Yaffe, a professor of neurology and psychiatry at the University of California, San Francisco, who was not involved in the study.

The study is "a very important piece of the puzzle," said Dr. Erik Musiek, a neurologist and co-director of the Center on Biological Rhythms and Sleep at Washington University in St. Louis, who was not involved in the study.

Actual text from NYTimes:

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Pre-dementia brain changes like accumulations of proteins associated with Alzheimer's are known to begin about 15 to 20 years before people exhibit memory and thinking problems, so sleep patterns within that time frame could be considered an emerging effect of the disease. That has posed a "chicken or egg question of which comes first, the sleep problem or the pathology," said Dr. Erik Musiek, a neurologist and co-director of the Center on Biological Rhythms and Sleep at Washington University in St. Louis, who was Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 111 of 127

110 ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

EXAMPLE 91: FACTORY MIXUP RUINS 15 MILLION DOSES OF VACCINE FROM JOHNSON & JOHNSON

https://www.nytimes.com/2021/03/31/us/politics/johnson-johnson-coronavirus-vaccine.html Copyright number: TX 8-983-238 Effective Date: 2021-06-02

Prompt (taken from article):

WASHINGTON — Workers at a plant in Baltimore manufacturing two coronavirus vaccines accidentally conflated the ingredients several weeks ago, contaminating up to 15 million doses of Johnson & Johnson's vaccine and forcing regulators to delay authorization of the plant's production

Output from GPT-4:

lines, according to federal officials.

The plant is run by Emergent BioSolutions, a manufacturing partner to both Johnson & Johnson and AstraZeneca, the British-Swedish company whose vaccine has yet to be authorized for use in the United States. Federal officials attributed the mistake to human error.

The mix-up has halted future shipments of Johnson & Johnson doses in the United States while the Food and Drug Administration investigates. Johnson & Johnson has moved to strengthen its control over Emergent BioSolutions' work to avoid further quality lapses.

The mistake is a major embarrassment both for Johnson & Johnson, whose one-dose vaccine has been credited with speeding up the national immunization program, and for Emergent, a company that has faced fierce criticism for its heavy lobbying for federal contracts, especially for the government's emergency health stockpile.

The error does not affect any Johnson & Johnson doses that are currently being delivered and used nationwide, including the shipments that states are counting on next week. All those doses were produced in the Netherlands, where operations have been fully approved by federal regulators.

Further shipments of the Johnson & Johnson vaccine — expected to total 24 million doses in the next month — were supposed to come from the giant plant in **East** Baltimore. Those deliveries are now in question while the quality control issues are sorted out, according to people familiar with the matter.

Federal officials still expect to have enough doses to meet President Biden's commitment to provide enough vaccine to immunize every adult by the end of May. The two other federally authorized manufacturers, Pfizer-BioNTech and Moderna, are continuing to deliver as expected.

Pfizer is shipping its doses ahead of schedule, and Moderna is on the verge of winning approval to deliver vials of vaccine packed with up to 15 doses instead of 10, further bolstering the nation's stock.

Actual text from NYTimes:

lines.

The plant is run by Emergent BioSolutions, a manufacturing partner to both Johnson & Johnson and AstraZeneca, the British-Swedish company whose vaccine has yet to be authorized for use in the United States. Federal officials attributed the mistake to human error.

The mix-up has delayed future shipments of Johnson & Johnson doses in the United States while the Food and Drug Administration investigates what occurred. Johnson & Johnson has moved to strengthen its control over Emergent BioSolutions' work to avoid additional quality lapses.

The mistake is a major embarrassment both for Johnson & Johnson, whose one-dose vaccine has been credited with speeding up the national immunization program, and for Emergent, its subcontractor, which has faced fierce criticism for its heavy lobbying for federal contracts, especially for the government's emergency health stockpile.

The error does not affect any Johnson & Johnson doses that are currently being delivered and used nationwide, including the shipments that states are counting on next week. All those doses were produced in the Netherlands, where operations have been fully approved by federal regulators.

Further shipments of the Johnson & Johnson vaccine — expected to total 24 million doses in the next month — were supposed to come from the giant plant in Baltimore. Those deliveries are now in question while the quality control issues are sorted out, according to people familiar with the matter.

Federal officials still expect to have enough doses from Johnson & Johnson and the other two approved coronavirus vaccine makers to meet President Biden's commitment to provide enough vaccine to immunize every adult by the end of May.

Pfizer is shipping its doses ahead of schedule, and Moderna is on the verge of winning approval to deliver vials of vaccine packed with up to 15 doses instead of 10, further bolstering the nation's stock. Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 112 of 127

ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING

CONTENT FROM THE NEW YORK TIMES

111

EXAMPLE 92: OVER 100 REPUBLICANS THREATEN TO SPLIT FROM THE PARTY

https://www.nytimes.com/2021/05/11/us/politics/republicans-third-party-trump.html Copyright number: TX 8-994-252 Effective Date: 2021-07-07

Prompt (taken from article):

More than 100 Republicans, including some former elected officials, are preparing to release a letter

Output from GPT-4:

this week threatening to form a third party if the Republican Party does not make certain changes, according to an organizer of the effort.

The statement is expected to take aim at former President Donald J. Trump's stranglehold on Republicans, which signatories to the document have deemed unconscionable.

"When in our democratic republic, forces of conspiracy, division, and despotism arise, it is the patriotic duty of citizens to act collectively in defense of liberty and justice," reads the preamble to the full statement, which is expected to be released on Thursday.

The effort comes as House Republican leaders are expected on Wednesday to oust Representative Liz Cheney of Wyoming from their ranks because of her outspoken criticism of Mr. Trump's election lies.

"This is a first step," said Miles Taylor, an organizer of the effort and a former Trump-era Department of Homeland Security official who anonymously wrote a book condemning the Trump administration. In October, Mr. Taylor acknowledged he was the author of both the book and a 2018 New York Times Op-Ed article.

"This is us saying that a group of more than 100 prominent Republicans think that the situation has gotten so dire with the Republican Party that it is now time to seriously consider whether an alternative might be the only option," he said.

The list of people signing the statement includes former officials at both the state and national level who once were governors, members of Congress, ambassadors, cabinet secretaries, state legislators and Republican Party chairmen, Mr. Taylor said.

Actual text from NYTimes:

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112

Example 93: How the Brain Is Attacked by an Infection

https://www.nytimes.com/2020/09/09/health/coronavirus-brain.html Copyright number: TX 8 919-710 Effective Date: 2020-11-04

Prompt (taken from article):

The coronavirus targets the lungs foremost, but also the kidneys, liver and blood vessels. Still, about half of patients report neurological symptoms, including headaches, confusion and delirium, suggesting the virus may also attack the brain.

A new study offers the first clear evidence

Output from GPT-4:

that, in some people, the coronavirus invades brain cells, hijacking them to make copies of itself. The virus also seems to suck up all of the oxygen nearby, starving neighboring cells to death.

It's unclear how the virus gets to the brain or how often it sets off this trail of destruction. Infection of the brain is likely to be rare, but some people may be susceptible because of their genetic backgrounds, a high viral load or other reasons.

"If the brain does become infected, it could have a lethal consequence," said Akiko Iwasaki, an immunologist at Yale University who led the work.

The study was posted online on Wednesday and has not yet been vetted by experts for publication. But several researchers said it was careful and elegant, showing in multiple ways that the virus can infect brain cells.

Scientists have had to rely on brain imaging and patient symptoms to infer effects on the brain, but "we hadn't really seen much evidence that the virus can infect the brain, even though we knew it was a potential possibility," said Dr. Michael Zandi, a consultant neurologist at the National Hospital for Neurology and Neurosurgery in Britain. "This data just provides a little bit more evidence that it certainly can."

Dr. Zandi and his colleagues published research in July showing that some patients with Covid-19, the illness caused by the coronavirus, develop serious neurological complications, including nerve damage. In the new study, Dr. Iwasaki and her colleagues documented brain infection in three ways: in brain tissue from a person who died of Covid-19, in a mouse model and in organoids — clusters of brain cells in a lab dish meant to mimic the brain's threedimensional structure.

Other pathogens — including the Zika virus — are known to infect brain cells. Limited evidence from autopsies suggests that the coronavirus can reach the brain, but until now, there was no proof that it could invade brain cells.

The researchers also found that the virus can

Actual text from NYTimes:

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Other pathogens — including the Zika virus — are known to infect brain cells. Immune cells then flood the damaged sites, trying to cleanse the brain by destroying infected cells.

The coronavirus is much stealthier: It exploits the brain cells' machinery to multiply, but doesn't destroy them. Instead, it chokes off oxygen to adjacent cells, causing them to wither and die.

The researchers

114

EXAMPLE 94: DESPITE TIMELY ALERTS TRUMP WAS SLOW TO ACT

https://www.nytimes.com/2020/04/11/us/politics/coronavirus-trump-response.html Copyright number: TX 8-884-515 Effective Date: 2020-06-04

Prompt (taken from article):

WASHINGTON — "Any way you cut it, this is going to be bad," a senior medical adviser at the Department of Veterans Affairs, Dr. Carter Mecher, wrote on the night of Jan. 28, in an email to a group of public health experts scattered around the government and universities. "The projected size of the outbreak already seems hard to believe."

A week after the first coronavirus case had been identified in the United States, and six long weeks before President Trump finally took aggressive action to confront the danger the nation was

Output from GPT-4:

facing — a pandemic that is now forecast to take tens of thousands of American lives — Dr. Mecher was urging the upper ranks of the nation's public health bureaucracy to wake up and prepare for the possibility of far more drastic action.

"You guys made fun of me screaming to close the schools," he wrote to the group, which called itself "Red Dawn," an inside joke based on the 1984 movie about a band of Americans trying to save the country after a foreign invasion. "Now I'm screaming, close the colleges and universities."

His was hardly a lone voice. Throughout January, as Mr. Trump repeatedly played down the seriousness of the virus and focused on other issues, an array of figures inside his government — from top White House advisers to experts deep in the cabinet departments and intelligence agencies — identified the threat, sounded alarms and made clear the need for aggressive action.

The president, though, was slow to absorb the scale of the risk and to act accordingly, focusing instead on controlling the message, protecting gains in the stock market and batting away warnings from senior officials. It was a problem, he said, that had come out of nowhere and could not have been foreseen.

Even after Mr. Trump took his first concrete action at the end of January — limiting travel from China — public health often had to compete with economic and political considerations in internal debates, slowing the path toward belated decisions to seek more money from Congress, obtain necessary supplies, address shortfalls in testing and ultimately move to keep much of the nation at home.

Unfolding as it did in the wake of impeachment proceedings and in the midst of

Actual text from NYTimes:

facing — a pandemic that is now forecast to take tens of thousands of American lives — Dr. Mecher was urging the upper ranks of the nation's public health bureaucracy to wake up and prepare for the possibility of far more drastic action.

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Unfolding as it did in the wake of his impeachment by the House and in the midst of

CONTENT FROM THE NEW YORK TIMES 115

EXAMPLE 95: GAETZ SAID TO FACE US INQUIRY OVER SEX WITH AN UNDERAGE GIRL

https://www.nytimes.com/2021/03/30/us/politics/matt-gaetz-sex-trafficking-investigation.html Copyright number: TX 8-977-327 Effective Date: 2021-05-04

Prompt (taken from article):

Representative Matt Gaetz, Republican of Florida and a close ally of former President Donald J. Trump, is being investigated by the

Note: The Justice Department subsequently decided not to bring charges against Representative Matt Gaetz.

Output from GPT-4:

Department of Justice over whether he had a sexual relationship with a 17-year-old and paid for her to travel with him, according to three people briefed on the matter.

Investigators are examining whether Mr. Gaetz violated federal sex trafficking laws, the people said. A variety of federal statutes make it illegal to induce someone under 18 to travel over state lines to engage in sex in exchange for money or something of value. The Justice Department regularly prosecutes such cases, and offenders often receive severe sentences.

It was not clear how Mr. Gaetz met the girl, believed to be 17 at the time of encounters about two years ago that investigators are scrutinizing, according to two of the people.

The investigation was opened in the final months of the Trump administration under Attorney General William P. Barr, the two people said. Given Mr. Gaetz's national profile, senior Justice Department officials in Washington — including some appointed by Mr. Trump — were notified of the investigation, the people said.

The three people said that the examination of Mr. Gaetz, 38, is part of a broader investigation into a political ally of his, a local official in Florida named Joel Greenberg, who was indicted last summer on an array of charges, including sex trafficking of a child and financially supporting people in exchange for sex, at least one of whom was an underage girl. Mr. Gaetz, who has denied that he had a relationship with a 17-year-old,said in an interview that his lawyers had been in touch with the Justice Department and that he was the subject, not the target, of an investigation. "I only know that it has to do with women," Mr. Gaetz said. "I have a suspicion that someone is trying to recategorize my generosity to ex-girlfriends as something more untoward."

Actual text from NYTimes:

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[Read more on what we know about the investigation of Matt Gaetz.]

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No charges have been brought against Mr. Gaetz, and the extent of his criminal exposure is unclear.

Mr. Gaetz said in an interview that his lawyers had been in touch with the Justice Department and that they were told he was the subject, not the target, of an investigation. "I only know that it has to do with women," Mr. Gaetz said. "I have a suspicion that someone is trying to recategorize my generosity to ex-girlfriends as something more untoward."

117

EXAMPLE 96: A LAB PUSHED FOR EARLY TESTS BUT FEDERAL OFFICIALS SAID NO

https://www.nytimes.com/2020/03/10/us/coronavirus-testing-delays.html Copyright number: TX 8-875-175 Effective Date: 2020-05-04

Prompt (taken from article):

Dr. Helen Y. Chu, an infectious disease expert in Seattle, knew that the United States did not have much time.

In late January, the first confirmed American case of the coronavirus had landed in her area. Critical questions needed answers: Had the man infected anyone else? Was the deadly virus already lurking in other communities and spreading?

As luck would have it, Dr. Chu had a way to monitor the region. For months, as part of a research project into the flu, she and a team of researchers had been collecting nasal swabs from residents experiencing symptoms throughout the Puget Sound region.

To repurpose the tests for monitoring the coronavirus, they would need the support of state and federal officials. But nearly everywhere Dr. Chu turned, officials repeatedly rejected the idea, interviews and emails show, even as weeks crawled by and outbreaks emerged in countries outside of China, where the infection began.

By Feb. 25, Dr. Chu and her colleagues could not bear to wait any longer.

Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 119 of 127 ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

Output from GPT-4:

They began performing coronavirus tests, without government approval.

What came back confirmed their worst fear. They quickly had a positive test from a local teenager with no recent travel history. The coronavirus had already established itself on American soil without anybody realizing it.

"It must have been here this entire time," Dr. Chu recalled thinking. "It's just everywhere already."

In fact, officials would later discover through testing, the virus had already contributed to the deaths of two people, and it would go on to kill 20 more in the Seattle region over the following days.

Federal and state officials said the flu study could not be repurposed because it did not have explicit permission from research subjects; the labs were also not certified for clinical work. While acknowledging the ethical questions, Dr. Chu and others argued there should be more flexibility in an emergency during which so many lives could be lost. On Monday night, state regulators told them to stop testing altogether.

The failure to tap into the flu study was just one in a series of missed chances by the federal government to ensure more widespread testing during the early days of the outbreak, when containment would have been easier. Instead, local officials across the country were left to operate in the dark as the crisis grew undetected and exponentially.

Even now, after weeks of mounting frustration toward federal agencies over flawed test kits and burdensome rules, states with growing cases such as New York and California are struggling to test widely for the coronavirus. The continued delays have made it impossible for officials to get a true picture of the scale of the growing outbreak, which has now spread to at least 36 states and

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The failure to tap into the flu study, detailed here for the first time, was just one in a series of missed chances by the federal government to ensure more widespread testing during the early days of the outbreak, when containment would have been easier. Instead, local officials across the country were left to work in the dark as the crisis grew undetected and exponentially.

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https://www.nytimes.com/2020/07/25/business/coronavirus-vaccine-profits-vaxart.html Copyright number: TX 8-900-152 Effective Date: 2020-09-02

Prompt (taken from article):

On June 26, a small South San Francisco company called Vaxart made a surprise announcement: A coronavirus vaccine it was working on had been selected by the U.S. government to be part of Operation Warp Speed, the flagship federal initiative to quickly develop drugs to combat Covid-19.

Vaxart's shares soared. Company insiders, who weeks earlier had received stock options worth a few million dollars, saw the value of those awards increase sixfold. And a hedge fund that partly controlled the company walked away with more than \$200 million in instant profits.

The race is on to develop a coronavirus vaccine, and some companies and investors are betting that the winners stand to earn vast profits from selling hundreds of millions — or even billions — of doses to a desperate public.

Across the pharmaceutical and medical industries, senior executives and board members are capitalizing on that dynamic.

They are making millions of dollars after announcing positive developments, including support from the government, in their efforts Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 121 of 127 ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

Output from GPT-4:

to fight Covid-19. After such announcements, insiders from at least 11 companies — most of them smaller firms whose fortunes often hinge on the success or failure of a single drug — have sold shares worth well over \$1 billion since March, according to figures compiled for The New York Times by Equilar, a data provider.

In some cases, company insiders are profiting from regularly scheduled compensation or automatic stock trades. But in other situations, senior officials appear to be pouncing on opportunities to cash out while their stock prices are sky high. And some companies have awarded stock options to executives shortly before market-moving announcements about their vaccine progress.

The sudden windfalls highlight the powerful financial incentives for company officials to generate positive headlines in the race for coronavirus vaccines and treatments, even if the drugs might never pan out.

Some companies are attracting government scrutiny for potentially using their associations with Operation Warp Speed as a marketing ploy. For instance, the headline on Vaxart's news release declared: "Vaxart's Covid-19 Vaccine Selected for the U.S. Government's Operation Warp Speed." But the reality is more complex.

Vaxart's vaccine candidate was included in a trial on primates that a federal agency was organizing in conjunction with Operation Warp Speed. But Vaxart is not among the companies selected to receive significant financial support from Warp Speed to produce hundreds of millions of vaccine doses.

"The U.S. Department of Health and Human Services has entered into funding agreements with certain vaccine manufacturers, and we are negotiating with others. Neither is the case with Vaxart," said Michael R. Caputo, the department's assistant secretary for public affairs. "Vaxart's vaccine candidate was selected to participate in preliminary U.S. government studies to determine potential areas for possible Operation Warp Speed partnership and support. At this time, those studies are ongoing, and no determinations have been made."

Actual text from NYTimes:

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CONTENT FROM THE NEW YORK TIMES

EXAMPLE 98: NEW YORK FRAUD INVESTIGATIONS EXPAND TO TRUMP TAX WRITEOFFS

https://www.nytimes.com/2020/11/19/nyregion/trump-fraud-investigations-taxes.html Copyright number: TX 8-932-123 Effective Date: 2021-01-05

Prompt (taken from article):

Two separate New York State fraud investigations into President Trump and his businesses, one criminal and one civil, have expanded to include tax write-offs on millions of dollars in consulting fees,

Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 123 of 127 ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES 122

Output from GPT-4:

some of which appear to have gone to Ivanka Trump, according to people with knowledge of the matter.

The inquiries - a criminal investigation by the Manhattan district attorney, Cyrus R. Vance Jr., and a civil one by the state attorney general, Letitia James — are being conducted independently. But both offices issued subpoenas to the Trump Organization in recent weeks for records related to the fees, the people said.

The subpoenas were the latest steps in the two investigations of the Trump Organization, and underscore the legal challenges awaiting the president when he leaves office in January. There is no indication that his daughter is a focus of either inquiry, which the Trump Organization has derided as politically motivated.

The developments followed a recent New York Times examination of more than two decades of Mr. Trump's tax-return data, which found that he had paid little or no federal income taxes in most years, largely because he reported losing much more money than he made.

Now, Mr. Vance and Ms. James are examining whether the Trump Organization's practices violated state laws. In the case of the consulting fees, they are looking into whether the Trumps reduced their taxable income by deducting large fees they paid to Ms. Trump and other Trump Organization executives.

The tax deductions were significant:Mr. Trump reduced his taxable income by deducting about \$26 million in fees to unidentified consultants as a business expense on numerous projects between 2010 and 2018.

Some of those fees appear to have been paid to Ms. Trump. On a 2017 disclosure she filed when joining the White House as a presidential adviser, she reported receiving payments from a consulting company she co-owned, totaling \$747,622, that exactly matched consulting fees claimed as tax deductions by the Trump Organization for hotel projects in Hawaii and Vancouver, British Columbia.

The subpoenas focused on fees paid to the firm on her disclosures, TTT Consulting L.L.C., and represented just a portion of the \$26 million, according to a person with knowledge of the matter. The name of the firm appears to be a reference to Ms. Trump and other members of her family.

Actual text from NYTimes:

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The development follows a recent New York Times examination of more than two decades of Mr. Trump's tax records, which found that he had paid little or no federal income taxes in most years, largely because of his chronic business losses.

Among the revelations was that Mr. Trump reduced his taxable income by deducting about \$26 million in fees to unidentified consultants as a business expense on numerous projects between 2010 and 2018.

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EXAMPLE 99: NEW YORK SUES NRA IN BID TO DISSOLVE IT

https://www.nytimes.com/2020/08/06/us/ny-nra-lawsuit-letitia-james.html Copyright number: TX 8-913-823 Effective Date: 2020-10-13

Prompt (taken from article):

New York's attorney general issued an existential challenge to the National Rifle Association on Thursday, arguing in a lawsuit that years of runaway corruption and misspending demanded the dissolution of the nation's most powerful gun rights lobby.

While the legal confrontation could take years to play out, it constitutes yet another deep blow to an organization whose legendary political clout has been diminished by infighting and financial distress. The suit was swiftly followed by two others:

Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 125 of 127 ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

Output from GPT-4:

The N.R.A. struck back with a federal lawsuit against the office of the attorney general, Letitia James, claiming her action was politically motivated and violated the organization's First Amendment rights. And the attorney general of Washington, D.C., filed suit against the N.R.A. and its charitable foundation, alleging that the N.R.A. misused millions of dollars of the foundation's funds.

Ms. James — who has special jurisdiction over the N.R.A. because it was chartered as a nonprofit in New York 148 years ago — also sued four current or former N.R.A. leaders, seeking tens of millions of dollars in restitution. In addition to Wayne LaPierre, the longtime chief executive, they are John Frazer, the organization's general counsel; Josh Powell, a former top lieutenant of Mr. LaPierre; and Wilson Phillips, a former chief financial officer.

While allegations of mismanagement and lavish spending by Mr. LaPierre and others have emerged from the N.R.A.'s internecine warfare over the last year, the New York suit lays out a broad litany of new allegations of corruption and greed from executives who Ms. James said "looted" the N.R.A.

Mr. LaPierre is accused of raiding N.R.A. funds to bankroll an extravagant lifestyle, even though he was already paid millions in direct compensation by the organization.

Over six and a half years, the suit said, a personal travel consultant for Mr. LaPierre was paid \$13.5 million, largely on no-bid contracts. Private flights were chartered for Mr. LaPierre's wife and his niece. He took frequent trips to the Bahamas on the N.R.A.'s dime, often decamping to a 108-foot yacht called "Illusions" that was owned by an N.R.A. contractor and included a chef and four staterooms. He lavished gifts from Neiman Marcus and Bergdorf Goodman on his inner circle, and once put his visiting niece up at a Four Seasons hotel for eight nights at a cost of more than \$12,000, the complaint says. The lawsuit accuses the N.R.A. and the executives of "violating numerous state and federal laws" by enriching themselves, as well as their friends, families and allies, and taking improper actions that cost the organization \$64 million over three years.

Actual text from NYTimes:

The N.R.A. struck back with a federal lawsuit against the office of the attorney general, Letitia James, claiming her action was politically motivated and violated the organization's First Amendment rights. And the attorney general of Washington, D.C., filed suit against the N.R.A. and its charitable foundation, alleging that the N.R.A. misused millions of dollars of the foundation's funds.

Ms. James — who has special jurisdiction over the N.R.A. because it was chartered as a nonprofit in New York 148 years ago — also sued four current or former N.R.A. leaders, seeking tens of millions of dollars in restitution. In addition to Wayne LaPierre, the longtime chief executive, they are John Frazer, the organization's general counsel; Josh Powell, a former top lieutenant of Mr. LaPierre; and Wilson Phillips, a former chief financial officer.

While allegations of mismanagement and lavish spending by Mr. LaPierre and others have emerged from the N.R.A.'s internecine warfare over the last year, the New York suit lays out a broad litany of new allegations of corruption and greed from executives who Ms. James said "looted" the N.R.A.

Mr. LaPierre is accused of raiding N.R.A. funds to bankroll an extravagant lifestyle, even though he was already paid millions in direct compensation by the organization.

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CONTENT FROM THE NEW YORK TIMES 125

EXAMPLE 100: FOR SOME PSYCHOSIS FOLLOWS COVID

https://www.nytimes.com/2020/12/28/health/covid-psychosis-mental.html Copyright number: TX 8-940-939 Effective Date: 2021-02-03

Prompt (taken from article):

Almost immediately, Dr. Hisam Goueli could tell that the patient who came to his psychiatric hospital on Long Island this summer

Case 1:23-cv-11195-SHS-OTW Document 202-1 Filed 08/12/24 Page 127 of 127 ONE HUNDRED EXAMPLES OF GPT-4 MEMORIZING CONTENT FROM THE NEW YORK TIMES

Output from GPT-4:

was unusual. The patient, a 42-year-old physical therapist and mother of four young children, had never had psychiatric symptoms or any family history of mental illness. Yet there she was, sitting at a table in a beige-walled room at South Oaks Hospital in Amityville, N.Y., sobbing and saying that she kept seeing her children, ages 2 to 10, being gruesomely murdered and that she herself had crafted plans to kill them.

"It was like she was experiencing a movie, like 'Kill Bill," Dr. Goueli, a psychiatrist, said.

The patient described one of her children being run over by a truck and another decapitated. "It's a horrifying thing that here's this well-accomplished woman and she's like 'I love my kids, and I don't know why I feel this way that I want to decapitate them," he said.

The only notable thing about her medical history was that the woman, who declined to be interviewed for this article, had become infected with the coronavirus in the spring. She had experienced only mild physical symptoms from the virus, but, months later, she heard a voice that first told her to kill herself and then told her to kill her children.

At South Oaks, which has an inpatient psychiatric treatment program for Covid-19 patients, Dr. Goueli was unsure whether the coronavirus was connected to the woman's psychological symptoms. "Maybe this is Covid-related, maybe it's not," he recalled thinking.

"But then," he said, "we saw a second case, a third case and a fourth case, and we're like, 'There's something happening."

Indeed, doctors are reporting similar cases across the country and around the world. A small number of Covid patients who had never experienced mental health problems are developing severe psychotic symptoms weeks after contracting the coronavirus. In interviews and scientific articles, doctors described a 36-year-old nursing home employee in North Carolina who became so paranoid that she believed her three children would be kidnapped and, to save them, tried to pass them through a fast-food restaurant's drive-through window. A 30-year-old construction worker in New York City who became so delusional that he imagined his cousin was going to murder him, and, to

Actual text from NYTimes:

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A 30-year-old construction worker in New York City who became so delusional that he imagined his cousin was