Legal

October 2017 quarterly check-in

WIKIMEDIA
FOUNDATION

Our department programs

Defense of Content & Communities

Transparency Report
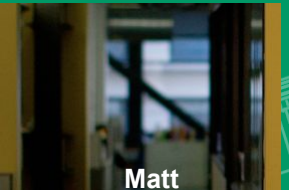
Fellowship Program

Promoting Free Culture

Public Policy

Our cross-department programs

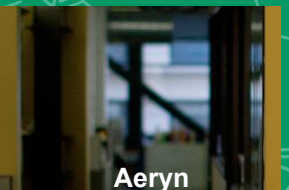**Wikimedia Brand & Identity**

Community Health

Privacy, Security, and Data Management

LEGAL TEAM

Katie

Zhou

Chuck

Rachel

Matt

Eileen

Jim

Stephen

Aeryn

Purrrrrcy

Leighanna

Niharika

Jacob

Jan

4
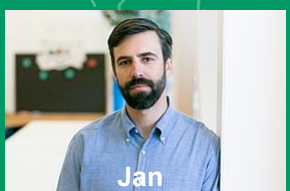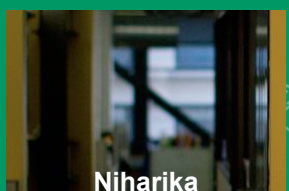
Cross-Department Programs

Program:
Wikimedia Brand and Identity

Segment 2:
Trademarks

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FOUNDATION

October 2017 **Legal** (Segment 2)   Brand and Identity

OUTCOME: Have the rights and tools necessary to protect the brand.

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
File, maintain, and defend trademark registrations worldwide	**LAST QUARTER**	
	- Jones Day (our outside trademark counsel who helps maintain registrations worldwide)	- Maintained trademark registrations worldwide, and defended them against wrongful legal and administrative challenges, including those from government offices and third parties globally.
	NEXT QUARTER	
	- Jones Day	- Same

STATUS: OBJECTIVE IN PROGRESS

October 2017 **Legal** (Segment 2)   Brand and Identity

OUTCOME: Have the rights and tools necessary to protect the brand.

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
File, maintain, and defend domain name registrations	**LAST QUARTER**	
	- MarkMonitor (service provider for managing domains)	- Maintained domain name portfolio
	NEXT QUARTER	
	- MarkMonitor - Porkbun (registrar for .wiki domains)	- Continue to maintain domain name portfolio

STATUS: OBJECTIVE IN PROGRESS

October 2017 **Legal** ([Segment 2](#))   [Brand and Identity](#)

OUTCOME: Third-party uses of the Wikimedia brands align with our mission and brand goals.

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Facilitate mission-aligned community and external uses of Wikimedia marks through our trademark policy and by granting trademark licenses	**LAST QUARTER**	
	- Communications (occasional need for review)	- Reviewed requests to use trademarks and drafted licenses when uses furthered or promoted the mission
	NEXT QUARTER	
	- Communications (occasional need for review)	- Continue reviewing permission requests and draft licenses as appropriate to allow mission-aligned uses of the marks

STATUS: OBJECTIVE IN PROGRESS

October 2017 **Legal** ([Segment 2](#))   [Brand and Identity](#)

OUTCOME: Prevent misuse of the Wikimedia brand.

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Send cease and desist notices and file complaints in response to trademark infringement	**LAST QUARTER**	
	- MarkMonitor (service provider for identifying infringement)	- Sent cease and desist letters to those misusing Wikimedia trademarks - Filed complaints through domain name dispute resolution procedures
	NEXT QUARTER	
	- MarkMonitor	- Continue to send cease and desist letters and initiate domain name disputes to curb misuse of trademarks

STATUS: OBJECTIVE IN PROGRESS

Program: Community Health

Segment 4: Legal Defense Fund

October 2017 **Legal**

OUTCOME: Support users who face significant harassment, and work to keep harassers away from Wikimedia sites.

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Provide funding for community members to bring anti-harassment legal claims, as appropriate or take direct legal action against users broadly disrupting the project, as appropriate	**LAST QUARTER**	
	-Anti-harassment working group -Susa-team	-Pursued a case -Announced community health fund at Wikimania
	NEXT QUARTER	
	-Anti-harassment working group -Susa-team	-Continue looking for appropriate cases and working on existing cases as needed.

Program:
Privacy, Security, and Data Management

Segment 1: Legal

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F O U N D A T I O N

October 2017 **Legal**

OUTCOME: Ensure high-quality protection and security of our infrastructure and data

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Evaluate current security practices and make changes and provide training as appropriate	**LAST QUARTER**	
	- Security - Tech	- Worked with appropriate teams to evaluate security practices and make appropriate changes
	NEXT QUARTER	
	- Security - Tech	- Continue evaluating current practices and making improvements as appropriate

STATUS: OBJECTIVE IN PROGRESS

October 2017 **Legal**

PS&DM

OUTCOME: Provide clear communications with members of the communities and public regarding our privacy practices

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Work with relevant teams to answer user and donor privacy questions	**LAST QUARTER**	
	- CE	- Community admin privacy training posted on Dashboard with other CE trainings - Answered privacy inquiries from community members & general public
	NEXT QUARTER	
		- Respond to privacy-related inquiries from users and donors

STATUS: OBJECTIVE IN PROGRESS

OUTCOME: Provide clear communications with members of the communities and public regarding our privacy practices

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Draft and update public-facing privacy-related policies and procedures	**LAST QUARTER**	
	- Various	- Reviewed surveys and prepared survey statements-
	NEXT QUARTER	
	- Various	- Draft survey statements or other policies as needed

STATUS: OBJECTIVE IN PROGRESS

October 2017 **Legal**

OUTCOME: Continue compliance with best practices for privacy

What is your objective ?	Who are you working with?	What impact / deliverables are you expecting?
Provide training in, draft internal policies relating to, and ensure privacy compliance	**LAST QUARTER**	
		- Provided training and draft policies as necessary
	NEXT QUARTER	
		- Provide training and draft policies as necessary

STATUS: OBJECTIVE IN PROGRESS

October 2017 **Legal**   PS&DM

OUTCOME: Continue compliance with best practices for privacy

What is your objective ?	Who are you working with?	What impact / deliverables are you expecting?
Ensure that privacy issues are considered throughout the product design process and lifecycle	**LAST QUARTER**	
	- Audiences	- Provide advice as necessary through Privacy by Design process
	NEXT QUARTER	
		- Provide advice as necessary through Privacy by Design process

STATUS: OBJECTIVE IN PROGRESS

October 2017 **Legal**

OUTCOME: Continue compliance with best practices for privacy

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Ensure compliance with applicable privacy, security, and data protection law	**LAST QUARTER**	
		- Provided counseling on privacy-related questions to all teams as needed
	NEXT QUARTER	
		- Continue to provide privacy-related counseling to all teams as needed

STATUS: OBJECTIVE IN PROGRESS

October 2017 **Legal**

OUTCOME: Continue compliance with best practices for data management

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Continue compliance with best practice for data management.	**LAST QUARTER**	
		- Evaluate current practices and make improvements as appropriate to ensure adherence to best practices for data management
	NEXT QUARTER	
		- Evaluate current practices and make improvements as appropriate to ensure adherence to best practices for data management

STATUS: OBJECTIVE IN PROGRESS

Department Programs

WIKIMEDIA
FOUNDATION

Defense of Content & Communities

WIKIMEDIA
FOUNDATION

October 2017 **Legal**

GOAL: Protect the Wikimedia Foundation, the Wikimedia communities and content, and the free knowledge movement broadly from legal threats

What is your objective / workflow?	Who are you working with?	What impact / deliverables are you expecting?
Defend against legal threats to the Foundation and Wikimedia content	**LAST QUARTER**	
	- SuSa - Outside counsel - Comms	- Victories vs defamation in Brazil and France, and desired outcome in in the U.S.
	NEXT QUARTER	
	- SuSa - Outside counsel - Comms	- Continue support for defending against litigation brought against the Foundation.

STATUS: OBJECTIVE IN PROGRESS

October 2017 **Legal**

GOAL: Protect the Wikimedia Foundation, the Wikimedia communities and content, and the free knowledge movement broadly from legal threats

What is your objective / workflow?	Who are you working with?	What impact / deliverables are you expecting?
Resist unreasonable or unlawful legal attempts to unmask community members (Part I)	**LAST QUARTER**	
	- SuSa - Outside counsel (on occasion) - Comms (on occasion)	- Resisted requests for non-public information to be detailed in the upcoming transparency report.

October 2017 **Legal**

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GOAL: Protect the Wikimedia Foundation, the Wikimedia communities and content, and the free knowledge movement broadly from legal threats

What is your objective / workflow?	Who are you working with?	What impact / deliverables are you expecting?
Resist unreasonable or unlawful legal attempts to unmask community members (Part II)	**NEXT QUARTER**	
	- SuSa - Outside counsel (on occasion) - Comms (on occasion)	- Continue to carefully evaluate all requests to remove/alter content or for nonpublic user info and push back in inappropriate cases

STATUS: OBJECTIVE IN PROGRESS

October 2017 **Legal**

GOAL: Protect the Wikimedia Foundation, the Wikimedia communities and content, and the free knowledge movement broadly from legal threats

What is your objective / workflow?	Who are you working with?	What impact / deliverables are you expecting?
Ensure compliance with applicable law	**LAST QUARTER**	
	- CE - Outside Counsel - Comms	- Responded to requests to be detailed in the transparency report
	NEXT QUARTER	
	- CE - Outside Counsel - Comms	- Continue defending the Foundation by responding to informal requests and complying with relevant law when properly formulated.

STATUS: OBJECTIVE IN PROGRESS

GOAL: Protect the Wikimedia Foundation, the Wikimedia communities and content, and the free knowledge movement broadly from legal threats

What is your objective / workflow?	Who are you working with?	What impact / deliverables are you expecting?
Fund defensive litigation for community members and movement organizations in appropriate circumstances through the Legal Fees Assistance Program and Defense of Contributors Program	**LAST QUARTER**	
	- CE - Outside Counsel - Comms	No new user cases this quarter
	NEXT QUARTER	
	- CE - Outside Counsel - Comms	- Provide support for new threats against good-faith users.

STATUS: OBJECTIVE IN PROGRESS

October 2017 **Legal**

GOAL: Protect the Wikimedia Foundation, the Wikimedia communities and content, and the free knowledge movement broadly from legal threats

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
File amicus briefs and proactive litigation where appropriate to protect the Wikimedia movement (Part I)	**LAST QUARTER**	
	- CE - Outside Counsel - Comms	- Status conference in *Wikimedia v. NSA*; discovery phase next - Search engine delistings intervention in France: Case has been referred to the ECJ - Joined two amicus briefs, one with a coalition of tech companies and organizations filed at the Supreme Court supporting challenge to travel/ immigration-related U.S. government executive orders and one supporting effort to prevent enforcement of Canadian global removal order

October 2017 **Legal**

GOAL: Protect the Wikimedia Foundation, the Wikimedia communities and content, and the free knowledge movement broadly from legal threats

| What is your objective / workflow?	Who are you working with?	What impact / deliverables are you expecting?
File amicus briefs and proactive litigation where appropriate to protect the Wikimedia movement (Part II)	**NEXT QUARTER**	
	- CE - Outside Counsel - Comms	- Continue public advocacy on key areas of the law that support the editorial discretion of the Wikimedia communities

STATUS: OBJECTIVE IN PROGRESS

Equustek v. Google

Previously spoke out via op-ed piece and intervention filed in Canadian court, about the chilling effects of this ruling.

Filed amicus in N.D.Cal. to support Google's effort to prevent enforcement of the order.

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Public domain
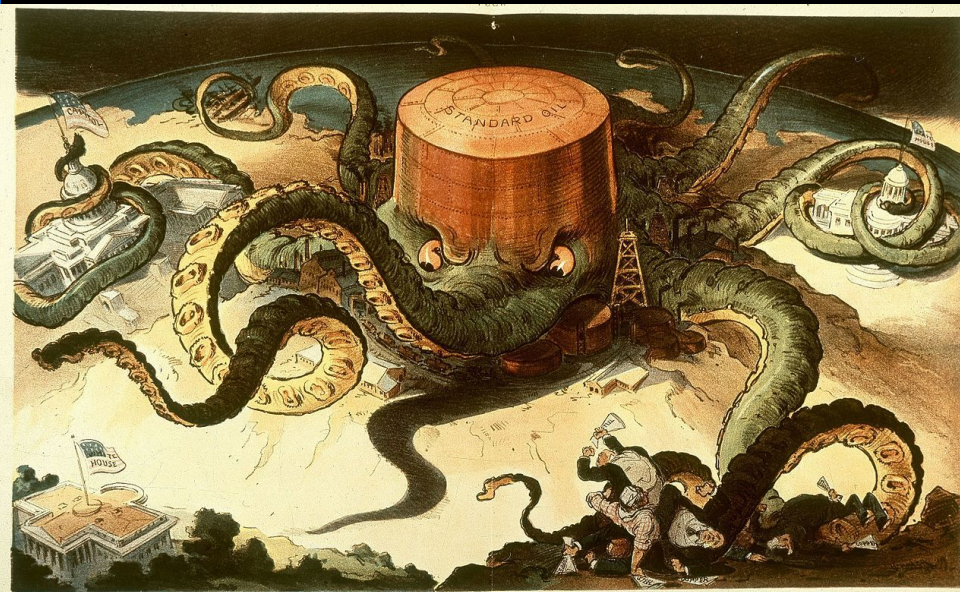
Transparency Report

WIKIMEDIA
FOUNDATION

- August 2017 report released online
- Brand new print edition
- Distributed at Wikimania
- Will continue to distribute at events in Q2

WIKIMEDIA
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Imagine a world ▮▮▮▮ ▮▮▮▮ ▮▮▮▮ freely ▮▮▮▮ of knowledge.

TRANSPARENCY REPORT 2017

WIKIMEDIA
FOUNDATION

GOAL: To publish two Transparency Reports, July/Aug. 2017 and Jan./Feb. 2018

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Publication of biannual Transparency Report	**LAST QUARTER**	
		- Publish online and printed copy transparency report in early August - Distribute the new printed version of the report at events
	NEXT QUARTER	
		- Continue distributing print report at events

STATUS: OBJECTIVE IN PROGRESS

Fellowship Program

October 2017 **Legal**

GOAL: Recruit a class of top fellows each semester who provide the Foundation with high-quality legal work and are passionate about the opportunity to learn about the Wikimedia movement.

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Have 3-7 legal fellows participate in the program each semester with an opportunity to advance the Wikimedia values, and maintain strong relationships with academic institutions	**LAST QUARTER**	
	- Talent and Culture	- Brought in 4 summer legal fellows representing several top schools including our continuing relationship with Yale. -One long term fellow who provides more in-depth team support. -Completed Fall recruiting for current class of two semester interns and one long-term
	NEXT QUARTER	
	- Talent and Culture	- Finish spring recruiting for two semester fellows and one long-term.

STATUS: OBJECTIVE IN PROGRESS

What you learned from the fellow program:

Did anything unexpected (good or bad) happen?

We received an offer to publish an article with the Yale Law Journal from one of our former fellows, regarding how the Wikimedia Communities handle fake news/bad sources, which has just recently gone out.

What would you do differently if you had to do it again?

The program went solidly overall, though planning some extra activities over the summer to help supplement for the GC transition might have helped.

Did you struggle with anything?

N/A

Promoting Free Culture

October 2017 **Legal**   None

GOAL: Provide core legal support for the Foundation

What is your objective / workflow?	Who are you working with?	What impact / deliverables are you expecting?
Update Wikipedia copyright license to Creative Commons 4.0 [delayed from last FY]	**LAST QUARTER**	
	- CE - Comms - Reading (desktop, mobile web, and apps)	*None*
	NEXT QUARTER	
	- Comms - Reading (desktop, mobile web, and apps)	- Announcing and implementing the upgrade to CC 4.0

STATUS: OBJECTIVE IN PROGRESS

What you learned doing the licensing upgrade?

Did anything unexpected (good or bad) happen?

We have continued to delay implementing the transition to CC 4.0, after the community discussion encouraging the transition in 2016.

What would you do differently if you had to do it again?

We should reserve staff time and resources for a major initiative like this.

Did you struggle with anything?

See above.

Public Policy

GOAL: Articulate positions on all public policy issues that are critical for the mission and operations of the Foundation

What is your objective / workflow?	Who are you working with?	What impact / deliverables are you expecting?
Monitor and assess ongoing policy developments worldwide, including issues that may affect other teams	**LAST QUARTER**	
	- Comms	- Provided our perspectives on intermediary liability in a letter to U.S. lawmakers about a bill that would weaken protections for platforms (facilitated by EFF) - Signed open letter calling for more transparency in the negotiations for a new NAFTA and adequate protections of user rights in the treaty Published blog post about the letter - Signed an amicus brief challenging U.S. travel and immigration restrictions at U.S. Supreme Court

GOAL: Articulate positions on all public policy issues that are critical for the mission and operations of the Foundation

What is your objective / workflow?	Who are you working with?	What impact / deliverables are you expecting?
Monitor and assess ongoing policy developments worldwide, including issues that may affect other teams	**NEXT QUARTER**	
	- Comms	- Apply to join Global Network Initiative and Network of Centers to bring the free knowledge perspective into these diverse networks (moved from Q4 to Q2) - Host UN Special Rapporteur on Freedom of Expression for a visit at WMF and explain our perspectives - Engage in conversations on access to knowledge and intermediary liability at Internet Governance Forum 2017 in Geneva.

STATUS: OBJECTIVE IN PROGRESS

October 2017 **Legal**

GOAL: Local Wikimedia communities are empowered to work towards policy change

What is your objective / workflow?	Who are you working with?	What impact / deliverables are you expecting?
Publish updates and resources on the Wikimedia public policy page, mailing list, and other venues	**LAST QUARTER**	
	- Comms - Travel	- Sent regular updates about policy issues to the public policy list to inform the communities and allies about our policy work - Supported community members in submitting comments on Database Directive to EU Commission - Gave talk about public policy at Wikimedia CEE meeting - Started communications channel for conversations about public policy between Latin American chapters

October 2017 **Legal**

GOAL: Local Wikimedia communities are empowered to work towards policy change

What is your objective / workflow?	Who are you working with?	What impact / deliverables are you expecting?
Publish updates and resources on the Wikimedia public policy page, mailing list, and other venues	**NEXT QUARTER**	
	- Comms	- Publish a biannual update to the public policy site to ensure it reflects the most recent developments (moved from Q1 to Q2) - Publish policy resource on non-commercial clauses to provide a clear, accessible explanation of why adding it to new copyright exceptions is harmful for free knowledge (moved from Q1 to Q2) - Send out updates to public policy list to keep volunteers informed about our work

STATUS: OBJECTIVE IN PROGRESS

GOAL: Local Wikimedia communities are empowered to work towards policy change

What is your objective / workflow?	Who are you working with?	What impact / deliverables are you expecting?
Organize meeting with select Wikimedians engaged in policy	**LAST QUARTER**	
	- Comms - Travel	- Hosted public policy meetup with community and other organizations at Wikimania

October 2017 **Legal**

GOAL: Local Wikimedia communities are empowered to work towards policy change

What is your objective / workflow?	Who are you working with?	What impact / deliverables are you expecting?
Organize meeting with select Wikimedians engaged in policy	**NEXT QUARTER**	
	- Comms - Free culture organizations	- Work with Comms and other orgs to explore possibility of fellowship program and community meetings.

STATUS: OBJECTIVE IN PROGRESS

October 2017 **Legal**

GOAL: Support Wikimedia communities around the world in resisting government censorship efforts, and increase people's ability to access and participate in the Wikimedia projects

What is your objective / workflow?	Who are you working with?	What impact / deliverables are you expecting?
Create and maintain informational resources to help empower Wikimedia communities in anti-censorship efforts	**LAST QUARTER**	
	- Comms - Travel	Continued support around Turkey block

October 2017 **Legal**

What you learned doing public policy:

Did anything unexpected (good or bad) happen?

Unexpected, last minute requests for signing on to coalition public policy letters. We are developing better policies and practices to make this process better.

What would you do differently if you had to do it again?

We're reviewing our criteria for evaluating opportunities to sign up to letters, campaigns, and coalitions.

Did you struggle with anything?

Limited capacity remains an issue. And there are more attacks, regionally and nationally, affecting our policy priorities to which we want to respond.

Department Non-Programmatic Work

Training

GOAL: Provide core legal support for the Foundation

What is your objective / workflow?	Who are you working with?	What impact / deliverables are you expecting?
Train Foundation staff on legal policies and procedures	**LAST QUARTER**	
	N/A	- No trainings delivered this quarter.
	NEXT QUARTER	
	-All staff -Managers -Legal and Comms	- Create and deliver trainings as necessary

STATUS: OBJECTIVE IN PROGRESS

Fundraising Law & Compliance Support

WIKIMEDIA
FOUNDATION

October 2017 **Legal**   None

OUTCOME: Compliance with global fundraising laws.

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Monitor fundraising, anti-spam, and other applicable laws in top fundraising countries	**LAST QUARTER**	
	- Outside counsel (Covington)	- Provided messaging feedback around email and online campaigns.
	NEXT QUARTER	
	- Outside counsel (Covington)	- Provide speedy ongoing feedback - Investigate Australia fundraising registration

STATUS: OBJECTIVE IN PROGRESS

October 2017 **Legal**   None

OUTCOME: Compliance with global fundraising laws.

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Maintain charitable organization registrations in all states	**LAST QUARTER**	
	- Labyrinth	- Updated Labyrinth with our new office address
	NEXT QUARTER	
	- Labyrinth	- Update registrations with new address through Q1 next year

STATUS: OBJECTIVE IN PROGRESS

October 2017 **Legal**   None

OUTCOME: Maintenance of strong endowment.

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Provide legal support and advice for maintenance of Wikimedia endowment	**LAST QUARTER**	
	- Advancement	*None*
	NEXT QUARTER	
	- Advancement	Prepared to provide ongoing support upon request.

STATUS: OBJECTIVE IN PROGRESS

Contracts

October 2017 **Legal**   None

OUTCOMES: Consistent and searchable recordkeeping, with streamlined creation, review, and approval of contracts; risk mitigation through contractual provisions

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Draft, review, and negotiate contracts to protect the Foundation and mitigate risk; Maintain a robust contracts program and process in collaboration with Finance and Administration	**LAST QUARTER**	
	- All departments needing contracts - Outside vendors	- Protected WMF and minimized risk through contractual agreements - Continued new contracts software trial - Completed contracts for Wikimania & move - Contracts turn-around - Goal: 95% w/i 7 days; **Actual: 95%** - **88 contracts approved**
	NEXT QUARTER	
	- All departments needing contracts - Finance - Outside vendors	- Continue to protect WMF and minimize risk through contractual agreements - Contracts turn-around - Goal: 95% w/i 7 days - Complete new contracts software trial & complete initial workflow with Finance for eventual full rollout FY18-19.

STATUS: OBJECTIVE IN PROGRESS

Worked with various teams (esp. Finance, OIT, Admin) on moving & installation contracts for the new space.

WIKIMEDIA
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October 2017 **Legal**   None

What you learned doing contracts?

Did anything unexpected (good or bad) happen?

Contracts volume was down slightly last quarter, but still relatively high. Continued our trial with Ironclad, a new and more user friendly contracts software solution. Unfortunately, a departure in CE left the Events team with minimal administrative support during a critical Wikimania period.

What would you do differently if you had to do it again?

For reasons described below, additional planning and flexibility could have made the Wikimania contracts process smoother.

Did you struggle with anything?

The contracts processes didn't mesh perfectly with event contracts for Wikimania, which sometimes required especially flexible payment options and last-minute changes/revisions that happened without getting necessary information to the legal and finance teams. These difficulties were compounded by the aforementioned lack of admin support for the Events team.

Board Support

October 2017 **Legal**

None

OUTCOME: Organized and productive Board meetings

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Organized and productive Board meetings	**LAST QUARTER**	
	- ED - Board leadership	- Supported special Board meetings on July 21 (online) - Supported planned Board meeting on August 9-10 (at Wikimania)
	NEXT QUARTER	
	- ED - Board leadership	- Support Board meeting and retreat on November 17-19, 2017

STATUS: OBJECTIVE IN PROGRESS

OUTCOME: Organized and productive Board meetings

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Take and publish official Board meeting minutes, and maintain other Board records	**LAST QUARTER**	
	- Board	- Minutes published for the July meeting - Prepared resolution for new Board appointment - Prepared resolution making Wiki Education Foundation eligible to participate in FDC grant process
	NEXT QUARTER	
	- Board	- Publish minutes for the August meeting - Prepare and publish minutes for the November board meeting

STATUS: OBJECTIVE IN PROGRESS

October 2017 **Legal**   None

OUTCOME: Prepared and informed Board members

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Prepare and conduct legal trainings, as needed	**LAST QUARTER**	
		- None
	NEXT QUARTER	
		- Provide legal training and orientation to new members prior to the November meeting

STATUS: OBJECTIVE IN PROGRESS

Copyright Clearance

October 2017 **Legal**

OUTCOME: Legally compliant media produced.

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Provide timely, clear, and helpful advice on the copyrighted works used in Foundation media	**LAST QUARTER**	
	- Comms	- Wikimania video; ad campaign in Nigerian and Kurdish -Other small video support
	NEXT QUARTER	
	- Comms	-Continue assisting as needed

STATUS: OBJECTIVE IN PROGRESS

General Legal Advice & Support

WIKIMEDIA
FOUNDATION

October 2017 **Legal**   None

OUTCOME: Organizational legal compliance, best practices, and risk mitigation achieved.

What is your objective?	Who are you working with?	What impact / deliverables are you expecting?
Provide timely, innovative, and effective legal advice and support to all departments as needed	**LAST QUARTER**	
	- Advancement - Comms - Finance and Administration - Audiences - Tech - CE - Partnerships & Global Reach	Conducted thorough research and provide pragmatic legal and policy advice to all teams as needed, for example: - Reviewed media inquiries with legal components - Provided product counseling
	NEXT QUARTER	
	Same	Same

STATUS: OBJECTIVE IN PROGRESS