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Anthony Sanders 00:00

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Anthony Sanders 00:56

Hello, and welcome to short circuit, your podcast on the Federal Courts of Appeals. I'm your host, Anthony Sanders, Director of the Center for Judicial Engagement at the Institute for Justice. We have a new presidential administration in place. But of course that doesn't mean lawsuits related to the previous administration are going to go away. They will be with us for a very long time. And no, I'm not referring here to the lawsuit of sorts going on in the US Senate, the impeachment trial of former President Trump but all the other various ripples in the law that he and his colleagues festooned upon the legal waters. Today, we're going to examine just a couple of these ripples, both of which were in the federal courts over the last few days. One that is not at a Court of Appeals, but maybe sometime soon. This week, Dominion voting systems filed a defamation suit against YouTube celebrity Rudy Giuliani, who, among other things, seems to be former President Trump's lawyer. The lawsuit alleges Giuliani knowingly lied about Dominion and claiming its voting machines allowed outside forces to steal the election from Trump. There's a lot going on, and it's a 107 page complaint. But we thought one question was particularly important. Does Rudy Giuliani have a First Amendment right to connect a Canadian voting machine company to the deceased Venezuelan dictator Hugo Chavez? We're going to be asking that of IJ's resident Canadian and American citizen Jeff Rose. Welcome to our American podcast, Jeff.

Jeff Rowes 02:31

Well, thank you very much as both a proud American and a native son of the true north strong and free. It is, as usual, my pleasure to be here.

Anthony Sanders 02:39

That's right, the sleeping giant to our north. Well, meanwhile, south of there, a case came out last week at the DC Circuit called Muthana v. Pompeo. You'll note that the name of now ex Secretary Mike Pompeo was one of the defendants. And I'm guessing it was issued on January 19th, 2021. To save having to change the caption once Pompeo was gone from his post. However, as you'll learn from the facts, it's not like the US Department of State was going to take a different position had Joe Biden's now Secretary of State Anthony Blinken been in charge. This case is a fascinating convergence of diplomatic immunity, the 14th Amendment citizenship clause, the fight against ISIS, and a part of the

Constitution I had never even thought about before: the reception clause. Joining us to talk about that international case is IJ attorney Kirby Thomas West, who once shared a train ride with a Central American diplomat. Welcome, Kirby.

Kirby Thomas West 03:42

Happy to be here, Anthony.

Anthony Sanders 03:44

So Jeff, you read this 107 page complaint. So our listeners didn't have to? What do you find?

Jeff Rowes 03:51

So it's great. And actually the complaint, much like IJ complaints, is written not just for a court of law, but for the court of public opinion. You know, I was gonna say it's a it's a page turner. It's, other than IJ complaints, it is like a John Grisham page turner, but that might not be fair to John Grisham because, honestly, if a if a Hollywood script writer for a show, like House of Cards, wrote a character, the way Rudy Giuliani is depicted in this complaint, someone raving about connections between this benign Canadian voting machine company, and Russians and communists and Venezuelan dictators and Soros and all of the boogeyman of the kind of far right. You would say, That's ham fisted that's over the top, you're jumping the shark, nobody's actually like that.

Anthony Sanders 04:38

Now, even Dan Brown would write something like that.

Jeff Rowes 04:40

I know. It's amazing. This, you know, the Rudy Giuliani character in this complaint, if it turns out to be true, and I mean, he is extensively quoted. This seems like Rudy Giuliani is in a very tough spot, even with all of the robust First Amendment protections for allegedly defamatory speech. The you know, the basic nutshell here is Giuliani has been sued for defamation per se. And what that means is a statement that is false, and you don't actually have to prove that the statement is harmful. And that generally falls into one of four categories. One is crime, you're accused of being a criminal. One is you're accused of some kind of sexual impropriety. You have a loathsome disease. So saying somebody's you know, falsely saying somebody has a cold is different than falsely saying that they have Ebola, or if you've engaged in improper or fraudulent business practices. And so I think here, you know, they have alleged that, you know, Dominion, has said that, Rudy Giuliani, has said that we are criminally involved in an elaborate conspiracy to deny President Trump his rightful place. And so that's terrible for the voting machine, not only because those are crimes, but also because its entire business model depends on it being known as accurate, transparent, secure, and nonpartisan. So this is defamation per se. If they're able to establish that these defamatory statements were made, damages are presumed and then Dominion just has to prove its damages. It asked for just over \$1.3 billion from Giuliani, so I mean, he may be well off, but he's probably judgment proof to that amount. But in any case, Dominion is going after him and a bunch of other folks. And, you know, just to get the theory is actually pretty easy to sum up. So Dominion's theory is when Rudy Giuliani was in court in these various lawsuits that the Trump campaign and the sort of coterie of enablers filed. When Rudy Giuliani was in court subject to rule 11 sanctions, and subject to the rules of evidence. He never alleged fraud.

He never alleged anything about dominion. But when he was out in public, and making statements on Twitter or YouTube or other types of social media and news interviews on Fox and other outlets, he repeatedly made these claims about the connection with this cabal of left wing subversion lists. And so what Dominion is saying, the fact that Giuliani never said these things in court is conclusive proof that he knew that they were without evidence and false and that he acted with the standard that the Supreme Court demands in finding defamation against a public figure talking about a public issue that Rudy Giuliani acted with actual malice in reckless disregard for the truth. And Dominion says that it will prove by clear and convincing evidence that this is defamatory under New York Times v. Sullivan. And so the you know, the big First Amendment issue is whether or not Rudy Giuliani actually has a First Amendment defense because, of course, he said that, look, this is just, you know, part of the left wing conspiracy, this lawsuit is an effort to silence me. But I, you know, I did a little bit of reading of, you know, how federal courts handle defamation, which is, which is state so he's and I should say that they're in the US District Court for the District of Columbia. But the defamation claim is based on DC state law, so to speak as a as its own jurisdiction, you know, in federal courts applying the New York Times v. Sullivan standard of actual malice, reckless disregard for the truth. This seems like it's going to be come awfully close to that line. And that I think, if I were if I were Rudy Giuliani, I would feel exceptionally nervous right now.

Kirby Thomas West 08:39

Yeah, I think, Jeff, you're right. The complaint in this case is just something to behold including even screen grabs of Giuliani hawking supplements on his YouTube Broadcast about this. But setting aside the just kind of entertainment value of reading the complaint, I really think looking at the kind of statements that Giuliani and his compatriots made, even without the aspect of him, you know, not making these allegations in court, just how absurd and how baseless they are on their face, I think he would rise to the New York Times v. Sullivan standard, even without the fact that he didn't allege any of this in the actual lawsuits. But I do think that that is a, you know, a compelling extra piece of information that they've brought in and will certainly help them get there.

Jeff Rowes 09:26

Right. You know, and I think what one interesting thing about this lawsuit, and this relates back to what I said earlier about how it resembles an IJ style public interest litigation lawsuit, is that even though it's on behalf of a big company, and they're seeking a vast amount of massive amount of damages, which is different than a typical public interest lawsuit, it's also true, that it matches exactly the kind of storytelling that works and results in successful big public interest style wins, which is that you have someone who's kind of heroically innocent, like you actually have, you know, Dominion comes across as the good guy in the store and Rudy Giuliani comes across, you know, either is an Emper or Palpatine like conniving villain or somebody who's maybe a cartoonish buffoon, but nevertheless, malicious in irresponsible in what he's done. And it not quite David and Goliath because Dominion is a big company, but it has all of those attributes of powerful stories, which is why, you know, my first impression was, "Oh, this is reading like a book or a novel or a screenplay or something like that." And I think that maybe makes a sort of interesting point that, you know, they repeatedly sent demand letters to Giuliani telling him to cut it out. And, you know, giving him detailed evidence refuting the assertions that he was making in public and Giuliani just plowed through those. And I think that's going to be a devastating fact at trial, like he could have pulled back in response to any of these demand letters. And he didn't.

Kirby Thomas West 10:58

Yeah, another piece, I think is interesting that I'd be interested to hear both of your thoughts on is in so many ways, we're living in a uniquely good time for free speech, and that there's so many outlets, you can have a Twitter account and have the whole world at your fingertips that broadcast your ideas. But our cultural understanding of free speech seems to be at a little bit of a low, like the fact that this has become a free speech rallying cry, "Oh, I'm being persecuted for my speech" and just a lack of understanding of what is defamation mean. And is it Do you have a right to a private company as a platform for your free speech? It just seems like the access to free speech and our cultural understanding and value of free speech aren't exactly matching up right now. I think this this lawsuit seems to be kind of emblematic of that.

Jeff Rowes 11:42

Well, you know, the other compellingly modern dimension of this case is how Dominion traces the propagation of Giuliani statements through social media. So you know, Giuliani says x, which he tweets out to his followers that command, you know, 80,000 retweets or something like that. And then President Trump retweets Giuliani to his 88 million followers. And so there is a way of tracing the flow of these ideas that just didn't exist in the past, and they paint a pretty compelling picture of these, you know, what i strongly suspect are devastating falsehoods. And that there's no realistic possibility that Giuliani is going to be able to assert the classic defense, which is the truth of you know, which is truth, the classic defense of defamation is it's true, his best case scenario, and I think this is going to present a pickle for his lawyers because his lawyers have to defend Giuliani statements in court subject to rule 11 sanctions. So I think they have to go into court and admit that there's absolutely no evidence for any of this. And yet somehow, there was a sufficient scintilla that Giuliani wasn't acting with absolute reckless disregard for the truth when he continued to say these things all the way I think he doesn't have a very good chance,

Anthony Sanders 13:00

Right. Well, there's two things he has to he could argue his lawyers, I should say, could argue there, right. One is that he read this stuff, somewhere, he was told this stuff by Sidney Powell, whatever you want to say. He thought it was not absolutely unbelievable. And then ran with it. And maybe got caught up in the moment or whatever it was serving his client. And the other is he's actually nuts. And so his lawyers could come out, he really believes this stuff. So it's not so it doesn't satisfy New York Times v. Sullivan. It would be interesting seeing them argue that he's actually nuts. And, you know, maybe he'll plead insanity. Maybe he'll just go for that. And then, you know, if he wins the lawsuit later, he could say I've snapped out of it. I'm not insane anymore. Or I mean, maybe that's a strategy here pool. Or he could say, Hey, I did read up. Maybe I was foolish to do so. But I depended on what these other people said. And it seemed like maybe there was some basis because I didn't get how the technology works and all that. Did you see any room there, Jeff? Or is this slice? Kirby said this is just, you know, someone told me there were aliens on Saturn controlling my mind, and I just totally believed them.

Jeff Rowes 14:22

So I think that I don't think he can avail himself of those kinds of arguments for two reasons. Number one, Dominion machines as the as the lawsuit alleges Dominion machines were used in over 1300

jurisdictions across the United States in 2016. And both red and blue states in which President Trump won by the exact same electoral margin that President Biden did. And so it's difficult to imagine that somehow these machines that reached what everybody at least everybody on Trump's side agreed was the right result in 2016. Suddenly, this turned into an international Venezuelan conspiracy between 2016 to 2020. So I don't think anybody's buying that. Number two, one of the points the lawsuit makes is that the big lie served Giuliani's personal financial interests quite apart from the political fortunes of him and his boss, namely, Giuliani was the more outrageous the lie became the more radicalized and diehard fan base Giuliani himself developed. And so he managed to sort of identify a pool of devoted acolytes who believed everything Giuliani says, so if Giuliani said that the sun goes around the earth. And Giuliani said this is all just a, you know, a conspiracy of liberal Heliocentrists, who are trying to tell you that the earth goes around the sun, they would believe it. And Giuliani did that, so he could hawk cigars to these people, you know, cybersecurity stuff, supplements, gold and silver to all of the kind of fringy precious metal types that are part of the kind of conservative movement at the edges. So I don't think that, and it is going to be very difficult to, under the evidence that's presented in the complaint for him to sort of run away from this and said, "Oh, I was as misled as anyone or I'm just an adult minded person." Although one wonders, I mean, given Giuliani's sort of prior stature, love him or hate him up through September 11, he's, his judgment seems profoundly diminished. And he's assumed the proportions of a bizarre cartoon character. So it's as though you're looking at a reflection of Giuliani in a funhouse mirror, rather than a real person.

Anthony Sanders 16:35

He's taken a different turn in the public eye, I would agree.

Kirby Thomas West 16:39

I do think that's sad to watch. I think one possible benefit of this lawsuit, though, will be all of those people. You mentioned, Jeff, who've really been taken in by this and other similar conspiracy theories, the fact that Giuliani is going to have to go into court and can't assert the truth and is going to have to, in some way, at least acknowledge that none of this is true. Hopefully, that will, you know, kind of help us move forward and help those people move forward past this kind of conspiracy thinking.

Anthony Sanders 17:04

Yeah, well, Kirby, to your question earlier, something our culture that the entire world really hasn't adjusted to with the internet and social media is how to weigh the truth that comes from the printed word, right. I mean, sometimes I think that's a little unfair. But sometimes people our age make fun of baby boomers for what they read, believing everything they read on Facebook, because when they were brought up, if something was in print, it had been vetted. It was trustworthy, right? It was basically what's in the newspaper. And so you tend to believe that stuff. Whereas now, if something's in print, that means nothing because everyone has a printer. I think that's a little unfair of baby boomers. I think there's people younger, unfortunately, who have that habit as well. And we haven't come as a culture to a point where we, you can kind of people know not to trust everything they read online, or don't just, you know, trust things that you want to believe. Because if you want to whatever you want to believe there's something out there in print, that will say that you're right. And so we will have to come to that point. This is an unusual instance where the truth actually hurts because it causes massive financial damage to a major corporation, unlike what, you know, most people throw around in politics. So

hopefully, it will be a reminder to people but I bet there will be many more such instances before we come to some kind of different status in our speech, but I think I think we will I think this is part of society evolving. But it's a rough transition that everyone's going through. One last question for you, Jeff, that we kind of skipped over it. But might be interesting to some listeners, might be a question some listeners have is why does the First Amendment or maybe not just the First Amendment, but the New York Times versus Sullivan standard, the typical standard for defamation, and First Amendment law, apply? Because is Dominion, this corporation, even a public figure?

Jeff Rowes 19:13

So Dominion, probably is a public figure. But even if Dominion weren't a public figure, Giuliani is clearly a public figure. And the issue is clearly a public issue. And so

Anthony Sanders 19:26

And so is that enough that it's a public issue, even if the person he's defaming isn't a public figure?

Jeff Rowes 19:34

Well, yes, generally speaking, because it's, you know, here we're talking about this important, like, basically, the theory behind New York Times v. Sullivan and its progeny is that we want to have unfiltered, robust debate about our political institutions and other core things. And so we want to be able to protect that debate and that's it and even if Giuliani is making potentially defamatory statements against a private group, if it's integrally related to a public issue, like who is the rightful and lawful President of the United States, Giuliani is himself entitled to that First Amendment protection, because Giuliani himself is participating in that in that vote. But in any case, I don't think that would matter, because I think Dominion, a company of its size that has so many voting machines, and so many jurisdictions in the United States, I think, at least when it comes to the integrity of the voting system is probably a public figure,

Anthony Sanders 20:33

In a sense, maybe that they were a public figure that almost no one had heard of, until this recent election, but nevertheless, because they're so integrated into our voting system, we consider them a public figure. Well, someone who was not a public figure was a 20 year old woman grew up in New Jersey, who decided it would be a good idea to go and join ISIS. She found out this was probably a bad idea along the way, but she also had a child. And unfortunately, because of some circumstances of her birth, she also found she no longer had a US passport. So Kirby, tell us about this woman's story, and how her father unsuccessfully has tried to help her out.

Kirby Thomas West 21:27

Sure, so this story starts back in 1994, when a Yemeni diplomat and his wife welcomed a baby girl named Hoda. Hoda was born in October of 1994, just one month after her father had lost his position actually, as a Yemeni diplomat. Interestingly, though, the United States Department was not informed that he had lost his post until after he was born at birth in February of 1995. This all becomes relevant later. So fast forward 20 years as he said Anthony, Hoda moves to Syria, becomes a member of ISIS marries two different ISIS fighters. With her second husband, she has a son. In 2018. things kind of go south for ISIS, and her father wants to bring her and her son back to the United States. The problem is,

although Hoda had been issued a passport in 2005, I believe when she was a child. The State Department said actually no, Hoda is not a US citizen that passport was issued in error. She was born during a time which her father had diplomatic immunity. And so though she was born in the United States, she was not born subject to the jurisdiction of the United States. And that's, you know, from the 14th Amendment in section one, it says all persons born or naturalized in the United States, and subject to the jurisdiction thereof are citizens of the United States. So because of that, and subject to the jurisdiction there of, diplomats and their children are not considered United States citizens. The interesting decision that the court had to make was, so her father lost his post as a diplomat, but the United States didn't know yet that he had lost his post. So was he still enjoying diplomatic immunity, when Hoda was born in October of 1994. And ultimately, the court said, Yes, he was still enjoying diplomatic immunity making Hoda not a citizen of the United States and not entitled to return to the United States as a citizen. And the analysis of that was kind of interesting, you know, they brought in the Vienna Convention on Diplomatic Relations, which defines when diplomatic immunity exists and says that the function of a diplomatic agent comes to an end, inter alia, a on notification by sending the sending state to the receiving state, that the function of the agent has come to an end. And what Hoda's father kind of kind of held on to there was that inter alia, and he said, "Okay, well, it's true that usually it might be when the state is notified that the post has come to an end. But there could be other things that also trigger an end and argue that hit the ending of his post is really what triggered it here." The court didn't buy that argument for a variety of reasons that are kind of interesting, but overall, you know, interesting case and also kind of harkens back to their last discussion, and that had earned a tweet from President Trump and was in the news for quite a while President Trump affirmed that he would never bring Hoda back and called her out by name and a tweet. Not relevant to the court's analysis. But an interesting an interesting note.

Anthony Sanders 24:53

Well, Jeff, you were born abroad. Any thoughts on this?

Jeff Rows 24:56

I was born abroad. I'm one of, you know, millions of people who come The United States every year looking for what do you call them? Something waves of grain. Oh, amber waves? Oh, yeah, no, no, no, no amber waves of grain, even though we have a lot of that in central Canada. But anyway, I thought that this case was really quite interesting. And the thing that struck me or the point that was a is that diplomatic immunity belongs to governments, it doesn't belong to individuals. And so when this guy thinks he had diplomatic immunity when he didn't have diplomatic immunity, or the effect that had on his children, or something like that, these are personal immunities, that, that they exercise or, or create or destroy, by virtue of their own actions. And furthermore, that the US grants diplomatic immunity and protects diplomats in the United States for the purpose of protecting American diplomats abroad, and so we want to have clear rules about when diplomatic immunity is terminated. And so it has to be a formal government to government communication, it is not like, somebody gets fired from Yemeni from the Yemeni diplomatic mission because he ran the photocopier too many times, and therefore, all of a sudden, he doesn't have diplomatic immunity anymore, or the United States might expel a diplomat, that person, you know, one of the points that case makes is that if you, even if your post is terminated, you still have diplomatic immunity up through the period, the reasonable period giving you a chance to leave the country. So even if it you know, for if for whatever reason, a diplomat, is fired, or even just

transferred to a new job, that doesn't mean they immediately lose their diplomatic immunity, even if they've notified the United States that the person is no longer going to be a diplomat so that they can leave the country. And that the, you know, the basic theory here behind their case was that the immunity is somehow an individual privilege and that and that its consequences mattered to individuals. And the other problem they ran into is that the facts are utterly horrible to them. Like, clearly, what they were trying to do was say, look, whatever the government to government rules are about diplomatic immunity. This is a really kind of difficult situation where this girl was born in the in the United States, She has no idea about the legal status of her parents or anything like that. And then she discovers later on through various due to various bureaucratic gears, that she's not an American citizen. Now, it might be true, that in some other factual context, maybe courts would find that compelling, like, for example, if there's a child who's brought to the United States, without lawful immigration status, and then grows up in the United States and finds that he or she isn't a citizen, that, you know, maybe courts would at least be willing to consider some kind of like, possibly rough justice and maybe interpret statutes a little bit more leniently, but the fact that she dropped out of high or dropped out of college in Alabama and went to join ISIS, and then after her first husband is killed, marries another guy right away, has a baby over there. And although and she was actually a propaganda agent for ISIS, she was even just like passively living there. She was an English language, propaganda agent. And so she was as unsympathetic as you can imagine.

Anthony Sanders 28:21

It seems like this only came up because she joined ISIS. If she stayed in Alabama, and then maybe traveled abroad later in life or whatever she could, I think she would have kept her passport.

Jeff Rowes 28:32

Yeah, like if she'd been, you know, she traveled abroad, and then, you know, come back to the United States. And she's like, arrested for shoplifting or something like that. And that somehow that just sets in, sets in motion a chain of events that lead to the State Department trying to figure out if she's really an American citizen, like, if she were just a shoplifter? No big deal, but you can't go I mean, the bottom line is, if your immigration status is unclear, don't go abroad, and become a propaganda agent for an incredibly oppressive terrorist organization.

Kirby Thomas West 29:05

Yeah, like he's like he said, Jeff, I mean, it was really egregious stuff to you have her say, calling explicitly for the murder of Americans as a propaganda agent for ISIS. And I think that because the court because of these facts, and the court probably was, you know, not particularly concerned with helping her out, you do get this kind of more rigorous legal analysis than you might otherwise have gotten. And that brings us to what Anthony mentioned earlier a clause in the Constitution that I also had never thought about, the reception clause, which is, of course, section three of Article two, which says that the President shall receive ambassadors and other public ministers and the court said that this Reception Clause of the President has the sole authority to receive ambassadors means that the executive really gets discretion in the vesting of diplomatic powers and determining when diplomatic immunity applies and when it doesn't apply. So that was a, you know, an interesting sub-part of this case, but I don't know that the court would have necessarily gotten to if, as you said, Jeff, it was a more

sympathetic story about somebody who was, you know, American as apple pie and stayed here the whole time.

Jeff Rows 30:11

And you know, the underlying tragedy here is that the diplomat after he left, you know, after he stopped being a diplomat, eventually became naturalized, his wife became naturalized. Their other children are naturalized. And there was just like this glitch, where Hoda didn't get naturalized. And so now that the real tragedy is that there is a baby in, it's not a refugee camp in Syria, and Kurdish controlled Syria, it is like a camp for prisoners of war. And so there's like a baby there, who has American grandparents, and relatives, American citizen relatives here in the United States, who would love to take care of that baby. And maybe there's a way for that to happen in the future, because the baby is absolutely flawless. But

Kirby Thomas West 30:55

yeah, that's and that's such, you're so right. That's such a heartbreaking aspect of this and your heartbreaks for the grandparents, that they're not able to do anything, and even a part of the case we didn't mention is the grandfather also sought a declaratory judgment, saying that he could at least send support to them to help them out without violating, you know, the statutory prohibition on supporting terrorism. And, you know, he wasn't able to do that, the court said he didn't have standing to get that declaratory judgment. But you can just kind of sense from the claims here. And the arguments that the grandfather is making just that desperation that, you know, if we can't bring them over here, at least, let me try to help this, as he said, totally innocent baby, that is a tragic aspect of the case.

Anthony Sanders 31:34

Yeah, the and the rules on being born abroad, to someone who is an American requires that person to be a full fledged US citizen, and to have also a certain amount, right residency time and all that. And so even though she's spent, basically her entire life, except for these ISIS years in the United States, because she doesn't have that ticket at the very beginning, she can't pass on citizenship to this to this baby. By the way, the rules for citizens born abroad to US citizens themselves. And when that person themselves becomes a citizen, are horribly complicated, and, and confusing. And I wrote a Twitter thread on that at one time, because I was actually born abroad to a US citizen. And although I always knew I was a US citizen, worked out like why that was at some point. So we'll put a link up on the case webpage, if you want to read that Twitter thread, the best form of legal analysis these days on why I am actually a US citizen. One thought of the reception clause is that this this, there's a concurrence by Judge Tatel that the opinion itself is Judge Rowe. And there's a dispute whether they needed to get to this Reception Clause thing, because there was there was the certification by the Department of State, which I believe was just during the litigation, saying "No, she's not a US citizen, or you know, this because of this diplomatic, because the diplomatic immunity was this time, not this time." But then there was this kind of ambiguous document that the family had from when she first got her passport about when it was. So clearly they had looked into this, it's not like they just tried to slip it through. But the Judge Tatel says, well, that one doesn't defeat the other for summary judgment. And so it's, we don't need to go to this reception clause. But this heavy hand of the reception clauses that look, if the executive says what diplomatic immunity is, in the litigation, you have to accept that it's kind of like a chevron doctrine on like, absolute error, but ability doctrine on what the executive says, that's left me a little uncomfortable. If you know, there was an actual sympathetic case. And, you know, for a lot of this

stuff, especially a long time ago, the documents are a little hazy, you know, as to when someone was in the country or whether they were a citizen at a certain time or had immunity. Um, you can imagine a number of circumstances. That did seem a pretty strong use of this Reception Clause, which, by the way, I always I've read that in the constitution before, I always just envisioned George Washington standing in a room and you know, diplomats would come in and he would receive them. And that's literally what it meant. But if there is some legal next to it, which, which is cool to learn about. Well, I think that enough for before receiving diplomats and for being born abroad. Two thirds of this panel were born abroad. So I hope you've all had a sufficient amount of international coverage for Short Circuit where we usually deal with us domestic law, but we'll look forward to doing that next time. In the meantime though, I hope all of you will get engaged.