

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

UNITED STATES OF AMERICA,

vs.

DONALD J. TRUMP, *et al.*,

Defendants.

Case No. 23-80101-CR
CANNON/REINHART

**PRESIDENT DONALD J. TRUMP’S MOTION FOR SUPPLEMENTAL
BRIEFING ON PRESIDENTIAL IMMUNITY AND A PARTIAL STAY**

President Donald J. Trump respectfully submits this motion for (1) leave to file supplemental briefing regarding the implications of *Trump v. United States* for the pending Presidential-immunity motion, ECF No. 324; and (2) a partial stay of further proceedings—with the exception of the pending gag-order motion, ECF No. 592—until President Trump’s motions based on Presidential immunity and the Appointments and Appropriations Clauses are resolved.¹

A partial stay that pauses CIPA and other litigation is warranted based on the reasoning in *Trump*, and such a stay would be consistent with DOJ policies and practices that the Special Counsel’s Office claims to be bound by but is largely ignoring. Resolution of these threshold questions is necessary to minimize the adverse consequences to the institution of the Presidency arising from this unconstitutional investigation and prosecution. A partial stay is also appropriate to prevent further exploitation of judicial institutions and resources by Executive Branch personnel in connection with the shameful ongoing lawfare campaign. Exigency supporting a partial stay is demonstrated by President Biden’s July 1, 2024 public comment—from inside the White House—

¹ Defendants Waltine Nauta and Carlos De Oliveira join in the motion for a partial stay.

linking Jack Smith's abuse of the criminal justice process to Biden's desperate and failing attempts to communicate with voters prior to the 2024 presidential election.

These efforts are so extreme and fanatical that on July 2, 2024, in an apparent response to President Biden's exceedingly weak debate performance on June 27, government officials leaked to the *Washington Post* Smith's misguided plans to continue to prosecute President Trump even as the President-elect. Those leaks were a blatant violation of DOJ policy and practice, with no apparent consequences to those responsible for the malfeasance, that has obvious relevance to the Court's Appointments Clause inquiries regarding the unchecked discretion and lack of oversight enjoyed by the Smith as he seeks to subvert the upcoming election. Collectively, these circumstances call for heightened caution while the Court addresses threshold issues regarding Smith's lack of authority to drive this prosecution forward on the dangerous and reckless course he has repeatedly sought to foist upon the Court. For these reasons, a partial stay is appropriate.

I. Supplemental Briefing

Consistent with President Trump's pending motion to dismiss based on Presidential immunity, the Supreme Court explained in *Trump* that it would "eviscerate the immunity we have recognized" if a prosecutor could "do indirectly what he cannot do directly—invite the jury to examine acts for which a President is immune from prosecution to nonetheless prove his liability on any charge." 2024 WL 3237603, at *19. Thus, "even when an indictment alleges only unofficial conduct," which is not the case here, prosecutors cannot "[u]se evidence" of official acts. *Id.* Based on this reasoning, like the trial court in the *Trump* case, Your Honor must undertake the "necessarily factbound analysis" regarding whether alleged conduct "is official or unofficial." *Id.*

To facilitate that process, the parties respectfully request permission to file supplemental briefing regarding Presidential immunity and the *Trump* decision pursuant to the following schedule:

- President Trump’s Opening Brief: July 26, 2024;
- Special Counsel’s Office Response: August 23, 2024; and
- President Trump’s Reply: September 9, 2024.

II. Partial Stay

The Court should stay all other proceedings in the case, except the pending gag-order motion, until the motions relating to Presidential immunity and the Appointments and Appropriations Clauses are resolved. The partial stay should include a pause on CIPA litigation—which is extremely resource-intensive for the defense, the Court and its staff, the security and staff responsible for making the courthouse and relevant secure facilities available, and the Classified Information Security Officer—because the Court’s rulings on the Presidential immunity issues will frame any necessary admissibility and substitution decisions under CIPA § 6.

As to Presidential immunity, Chief Justice Roberts reasoned that “[q]uestions about whether the President may be held liable for particular actions, consistent with the separation of powers, must be addressed *at the outset of a proceeding.*” *Trump*, 2024 WL 3237603, at *22 (emphasis added). He expressed concern that courts in the District of Columbia had rendered their “decisions on a highly expedited basis” despite the “unprecedented nature” of that case. *Id.* at *13; *see also id.* at *18 (referring to “[t]he concerns we noted at the outset—the expedition of this case, the lack of factual analysis by the lower courts, and the absence of pertinent briefing by the parties . . .”). In this equally unprecedented case, the Presidential immunity questions implicate important Presidential powers discussed in *Trump*, such as “foreign relations responsibilities,” “meeting

foreign leaders,” “overseeing international diplomacy and intelligence gathering, “managing matters related to terrorism,” and “responsibility for the actions of the many departments and agencies within the Executive Branch.” *Id.* at *8.

Regarding the Appointments Clause, including the principal-officer issue, Justice Thomas reasoned in his concurrence:

If this unprecedented prosecution is to proceed, it must be conducted by someone duly authorized to do so by the American people. The lower courts should thus answer these essential questions concerning the Special Counsel’s appointment before proceeding.

Id. at 25; *see also id.* at 28 (“Perhaps there is an answer for why these statutes create an office for the Special Counsel. But, before this consequential prosecution proceeds, we should at least provide a fulsome explanation of why that is so.” (Thomas, J., concurring)).

A partial stay pending resolution of threshold constitutional questions would be consistent with the election-inference prohibition in the Justice Manual, which the Special Counsel’s Office is falsely purporting to follow. *See, e.g.*, 6/21/24 Tr. 147:13-14, 148:3-7. As the Court is aware, Justice Manual § 9-85.500 prohibits “[f]ederal prosecutors and agents” from “select[ing] the timing of any action . . . for the purpose of affecting any election.” *Id.* On the list of the Office’s misrepresentations to the Court in this case is the ludicrous claim at the March 1, 2024 hearing that § 9-85.500 “does not apply to cases that have already been charged.” 3/1/24 Tr. 80.

The falsity of that assertion is plain from the reference to “any action” in Justice Manual § 9-85.500. The Attorney General made this clear in a June 24, 2024 memorandum regarding “Election Year Sensitivities.” *See Ex. A.* Citing Justice Manual § 9-85.500 and other provisions, the Attorney General accurately described the DOJ policy that the Special Counsel’s Office is actively violating while allegedly under his supervision:

Law enforcement officers and prosecutors may never select the timing of public statements (attributed or not), investigative steps, criminal charges, or any other action in any matter

or case for the purpose of affecting any election, or for the purpose of giving an advantage or disadvantage to any candidate or political party. Such a purpose, or the appearance of such a purpose, is inconsistent with the Department's mission and with the Principles of Federal Prosecution.

Id. at 1. The Office's misrepresentation regarding the scope of Justice Manual § 9-85.500 and their ongoing disregard of the provision, apparently without consequences, are relevant to the Court's consideration of whether Smith is a principal officer under the Appointments Clause because of his lack of a functional superior at DOJ as well as his unchecked (and wildly abused) discretion. The Attorney General's recent guidance regarding Justice Manual § 9-85.500 also demonstrates that no prejudice would result from the requested partial stay because the Office should not be taking "any action" that could even create the "appearance" of interference with the election. Ex. A at 1.

Such a stay would be consistent with DOJ's separate "Unwritten 60-Day Rule."² According to DOJ's Office of the Inspector General ("DOJ-OIG"), "[s]everal Department officials described a general principle of avoiding interference in elections rather than a specific time period before an election during which overt investigative steps are prohibited." DOJ-OIG Report at 18. Raymond Hulser, who is now working for Jack Smith, told DOJ-OIG that "there is a general admonition that politics should play no role in investigative decisions, and that taking investigative steps to impact an election is inconsistent with the Department's mission and violates the principles of federal prosecution." *Id.* at 18. This "Rule," or "admonition," is another one of the DOJ practices that, like the Justice Manual, the Office claims to owe fealty. *See* 6/21/24 Tr. 148:23-25.

² A Review of Various Actions by the Federal Bureau of Investigation and Department of Justice in Advance of the 2016 Election, Office of Inspector General, U.S. Dep't of Justice (June 2018) (the "DOJ-OIG Report") at 17-18, <https://s3.documentcloud.org/documents/4515884/DOJ-OIG-2016-Election-Final-Report.pdf>.

DOJ-OIG's 2018 Report detailed statements from several former high-ranking DOJ officials regarding this established practice, which the Special Counsel's Office is ignoring:

- Jim Comey: "[W]e avoid taking any action in the run up to an election, if we can avoid it." *Id.* at 17.
- Loretta Lynch: "[I]n general, the practice has been not to take actions that might have an impact on an election, even if it's not an election case or something like that." *Id.* at 18.
- Sally Yates: "To me if it were 90 days off, and you think it has a significant chance of impacting an election, unless there's a reason you need to take that action now you don't do it." *Id.* at 18.

President Biden's public comments following the *Trump* decision on July 1, 2024, confirmed the ongoing violations of DOJ policy and practice arising from Jack Smith's efforts to rush this deeply flawed case—and the similarly flawed and politically-motivated *Trump* case in the District of Columbia—to trial. Referring to Smith's prosecution in the District of Columbia, President Biden argued that "the American people deserve to have an answer in the courts before the upcoming election."³ The remark explicitly connected the Special Counsel's Office with President Biden's misuse of the criminal justice system to communicate with voters prior to the election. President Biden effectively confessed to spearheading the unconstitutional, unprecedented, and ultimately unsuccessful lawfare campaign joined by Smith's Office, DOJ and other federal agencies, and the private interests backing them as they desperately try to prevent the American people from electing President Trump. President Biden essentially boasted about being the root cause of the "prospect of an Executive Branch that cannibalizes itself." *Trump*, 2024 WL 3237603, at *24.

³ Remarks by President Biden on the Supreme Court's Immunity Ruling, July 1, 2024, <https://www.whitehouse.gov/briefing-room/speeches-remarks/2024/07/01/remarks-by-president-biden-on-the-supreme-courts-immunity-ruling>.

Remarkably, on the day after President Biden’s remarks and not long after President Trump’s overwhelming debate victory, “people familiar with” DOJ’s “internal deliberations” fully embraced their role in this abomination by telling the media that Jack Smith and DOJ plan to “pursue the criminal cases against Donald Trump past Election Day even if he wins” Ex. B (*Washington Post* article). The decision to perpetrate these leaks as part of the response to President Biden’s crushing debate defeat resolves any doubt that Smith and the Special Counsel’s Office prioritize politics over justice. Smith’s indirect notification to the media and his allies that he has no qualms about prosecuting President Trump, even as President-elect after more than 100 million Americans cast their votes, is in blatant violation of DOJ policy and practice. Having falsely and implausibly alleged that President Trump conspired “against the right to vote and to have one’s vote counted” in connection with the 2020 election,⁴ Smith has forecast his and DOJ’s willingness to violate those civil rights as part of President Biden’s election-interference mission.

The July 2, 2024 leaks by DOJ and the Special Counsel’s Office violated the Attorney General’s June 24 guidance that (1) “prosecutors may never select the timing of public statements (attributed or not) . . . for the purpose of giving an advantage or disadvantage to any candidate”; and (2) even “the *appearance of such a purpose*” is “inconsistent with the Department’s mission and with the Principles of Federal Prosecution.” Ex. A at 1 (emphasis added). If the Office continues to oppose this stay request, they should be required to identify the source of these leaks, address the apparent violations of DOJ policy, and explain what remedial measures have been put in place.

In conclusion, President Biden’s lawfare confession, the government’s recent leaks, and the underlying details will require dismissal of the Superseding Indictment for multiple reasons,

⁴ Indictment ¶ 4, *United States v. Trump*, No. 23 Cr. 257 (D.D.C. Aug. 1, 2023).

including selective and vindictive prosecution, prosecutorial misconduct, and violations of the Fourth Amendment, due process, and the attorney-client privilege, among other rights. For purposes of this motion, however, our request is a modest one. The Court should resolve the threshold questions identified in *Trump* relating to Presidential immunity and the Appointments Clause, as well as the related issues presented in the Appropriations Clause motion, prior to addressing the other numerous problems with this case.

Dated: July 5, 2024

Respectfully submitted,

/s/ Todd Blanche / Emil Bove

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CERTIFICATE OF CONFERENCE

I hereby certify that on July 3, 2024, counsel for President Trump and the Special Counsel's Office conferred in a good faith effort to resolve the issues herein, but were unable to do so with respect to President Trump's stay motion. The Special Counsel's Office requested that we include the following statement:

The Government objects to a stay and requests an opportunity to respond to any stay motion within the time the Local Rules provide.

CERTIFICATE OF SERVICE

I, Kendra L. Wharton, certify that on July 5, 2024, I electronically filed the foregoing document with the Clerk of Court using CM/ECF.

/s/ Kendra L. Wharton
Kendra L. Wharton

EXHIBIT A



Office of the Attorney General
Washington, D. C. 20530

June 24, 2024

MEMORANDUM FOR ALL DEPARTMENT EMPLOYEES

FROM: THE ATTORNEY GENERAL

SUBJECT: ELECTION YEAR SENSITIVITIES

Department of Justice employees are entrusted with the authority to enforce the laws of the United States and with the responsibility to do so in a neutral and impartial manner. This is particularly important in an election year. Now that the 2024 election season is upon us, and as in prior election cycles, I am issuing this memorandum to remind you of the Department's existing policies with respect to political activities.

I. STATEMENTS, INVESTIGATIONS, AND CHARGING NEAR AN ELECTION

The Department of Justice has a strong interest in the prosecution of election-related crimes, such as those involving federal and state campaign finance laws, federal patronage laws, and corruption of the election process. As Department employees, however, we must be particularly sensitive to safeguarding the Department's reputation for fairness, neutrality, and non-partisanship.

Simply put, partisan politics must play no role in the decisions of federal investigators or prosecutors regarding any investigations or criminal charges. Law enforcement officers and prosecutors may never select the timing of public statements (attributed or not), investigative steps, criminal charges, or any other action in any matter or case for the purpose of affecting any election, or for the purpose of giving an advantage or disadvantage to any candidate or political party. Such a purpose, or the appearance of such a purpose, is inconsistent with the Department's mission and with the Principles of Federal Prosecution. *See* JM § 9-27.260 – Initiating and Declining Charges – Impermissible Considerations; JM § 9-85.500 – Actions that May Have an Impact on an Election.

If you face an issue, or the appearance of an issue, regarding the timing of statements, investigative steps, charges, or other actions near the time of a primary or general election, contact the Public Integrity Section of the Criminal Division ("PIN") for further guidance. Such consultation is also required at various stages of all criminal matters that focus on violations of federal and state campaign-finance laws, federal patronage crimes, and corruption of the election process. More detailed guidance is available in Sections 1-4 and 9-85 of the Justice Manual at <https://www.justice.gov/jm/justice-manual>.

Memorandum for All Department Employees
Subject: Election Year Sensitivities

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Finally, Department employees must also adhere to the additional requirements issued by the Attorney General on February 5, 2020, governing the opening of criminal and counterintelligence investigations by the Department, including its law enforcement agencies, related to politically sensitive individuals and entities. *See* Memorandum of Attorney General William Barr, Additional Requirements for the Opening of Certain Sensitive Investigations, February 5, 2020 (“February 2020 AG Memorandum”). Any questions regarding the scope or requirements of the February 2020 AG Memorandum should be directed to PIN.

II. HATCH ACT

As you are aware, the Hatch Act generally prohibits Department employees from engaging in partisan political activity while on duty, in a federal facility, or using federal property. Please note that this prohibition includes using the Internet at work for any political activities. The Act also prohibits us from using our authority for the purpose of affecting election results; soliciting (or discouraging) political participation; soliciting, accepting, or receiving political contributions; and generally from running as a candidate in a partisan election.

In addition to restrictions on what Department employees may and may not do while on duty, while using government property, and in off-duty activities, certain employees are further restricted from engaging in certain political activity even while not on duty. The degree to which an employee is restricted in his/her off duty activities depends on his/her position, with further restrictions applying to members of the career SES, administrative law judges, Criminal Investigators and Explosives Enforcement Officers of the Bureau of Alcohol, Tobacco and Firearms, non-career appointees in the Department, and employees of the Criminal Division, National Security Division, and the Federal Bureau of Investigation. If you are unclear on these restrictions or the classification of your position, please consult with your component’s designated ethics official about the limits of permissible activity prior to engaging in any political activity. You can also visit the Justice Management Division’s Ethics page at www.justice.gov/jmd/political-activities for more detailed information, which includes the most recent guidance issued by the Assistant Attorney General for Administration and links to memoranda issued to both career employees and non-career appointees dated August 30, 2022.

It is critical that each of us complies with the Hatch Act and the principles set out in this memorandum to ensure that the public retains its confidence that we are adhering to our responsibility to administer justice in a neutral manner. The Department's reputation for fairness and impartiality depends upon it.

EXHIBIT B



NATIONAL SECURITY Foreign Policy Intelligence Justice Military

THE TRUMP CASES

Justice Dept. plans to pursue Trump cases past Election Day, even if he wins

If Donald Trump is elected president, the finish line for federal prosecutors is Inauguration Day, not Election Day, people familiar with the discussions said

By [Devlin Barrett](#) and [Perry Stein](#)

July 2, 2024 at 6:03 p.m. EDT



Special counsel Jack Smith announces the indictment of former president Donald Trump during a news conference in Washington on Aug. 1. (Ricky Carioti/The Washington Post)

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Justice Department officials plan to pursue the criminal cases against Donald Trump past Election Day even if he wins, under the belief that department rules against charging or prosecuting a sitting president would not kick in until Inauguration Day in January, according to people familiar with the discussions.

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That approach may become more consequential given this week's Supreme Court ruling on presidential immunity, which probably will lead to further delays to Trump's election interference trial in D.C. and has already affected one of his state cases.

Senior law enforcement officials have long viewed the two federal indictments against Trump — the 45th president and the presumptive Republican nominee in this year's election — as operating with potential time constraints. That's because of long-standing Justice Department policy that officials cannot criminally charge a sitting president.

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Lawyers in the department do not believe the policy bars them from proceeding against a president-elect, however, according to the people familiar with the discussions, who spoke on the condition of anonymity to describe internal deliberations.

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The plan to continue filing motions, seeking court hearings, and potentially conducting a trial between Election Day and Inauguration Day underscores the highly unusual nature of prosecuting not just a former president, but also possibly a future one. In the months after winning election, a president-elect assumes some of the trappings of the office, such as more security and high-level briefings, but that person is not the commander in chief.

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In the midst of a presidential election in which criminal cases have

played a central role, any court activity involving a president-elect would push American politics deeper into uncharted territory. Ultimately, it would be up to the courts to decide when and how to hold hearings or a trial involving a president-elect.

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“The Justice Department isn’t governed by the election calendar. Its prosecution of Trump is based on the law, the facts and the Justice Manual — the department’s bible that lays out the post-Watergate norms that have prevented it from being weaponized,” said Anthony Coley, a former Justice Department spokesman for Attorney General Merrick Garland who left the agency last year. “Until those norms change, or they’re ordered otherwise, I’d expect this Justice Department to be full speed ahead. And they should be.”

Current officials, speaking on the condition of anonymity, expressed the same sentiment — that if Trump wins the election, the clock on the two federal cases against him would keep ticking until Jan. 20, when he would be sworn in as the 47th president.

A spokesman for special counsel Jack Smith declined to comment. Trump spokesman Steven Cheung said the criminal cases against Trump are “hoaxes” that “are imploding as their collective efforts to interfere in the election have massively backfired.”

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On Monday, the final day of its term, the Supreme Court ruled 6-3 along ideological lines that Trump and other presidents have broad immunity from prosecution for official acts. The landmark decision also found that presidents do not have immunity for private acts, leaving it unclear exactly where the line would be drawn between the two.

The ruling came in the pending prosecution of Trump for alleged obstruction of the 2020 election results. Legal experts said the high court's decision means it is highly likely that trial won't take place before the November election, as prosecutors and Trump's lawyers spar further over what evidence can still be used against him. Those decisions, too, may ultimately end up before the Supreme Court.

Even before the immunity ruling, Justice Department officials were skeptical there would be a federal trial of Trump before the 2024 election, according to people familiar with the discussions. In addition to the D.C. election obstruction case, he is charged in Florida with mishandling classified documents after leaving the White House and obstructing government efforts to retrieve them.

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The two federal cases were scheduled to go to trial in the spring but have been slowed significantly for different reasons.

In Florida, the trial judge has spent months poring over a host of long-shot defense motions to get the case dismissed. The election obstruction case filed in Washington was frozen as an appeals court and the Supreme Court wrestled with the question of presidential immunity.

The latest updates on Trump's trials

July 1

Federal Jan. 6 election case

The Supreme Court ruled that Trump is immune from prosecution for official actions taken while in the White House, but that he lacks such immunity for unofficial acts. The 6-3 ruling, decided on ideological lines, sends the case back to a lower court to determine whether the acts alleged in the indictment were official or unofficial acts.

Even when the case in D.C. resumes, there are likely to be a series of pretrial battles in addition to the immunity questions that consume a significant amount of time. Given the pace of hearings to date in the two federal cases, it's possible that even with the longer time window until Inauguration Day, neither will go to trial by then.

If Trump wins the presidency, his legal team probably would ask the judges overseeing the cases to dismiss the charges outright, or at least put the cases on ice while he is president. Trump's attorney general could also move to have the charges dropped.

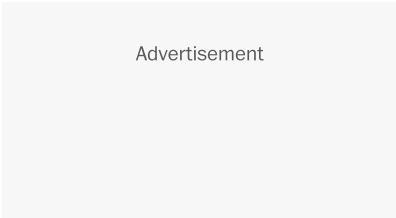
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Trump separately faces a criminal indictment in Georgia, where Fulton County District Attorney Fani T. Willis has accused him of a conspiracy to obstruct the 2020 election results in that state.

The Georgia case, which is stalled by a different appeals issue, will also be affected by the immunity ruling. Trump's lawyers in that case have argued that if their client is elected president, his trial could not take place until at least 2029, when he leaves office.

Ripple effects from the immunity ruling have already begun in Trump's other state case.

In New York, where Trump was convicted in May of falsifying business records relating to a hush money payment to an adult-film actress, the trial judge on Tuesday pushed back Trump's sentencing, which had been scheduled for next week. The judge gave lawyers weeks to file written arguments over Trump's claim that his conviction should be tossed out in the wake of the high court's immunity decision.



Trump’s claim won’t necessarily sway the judge, because the type of conduct at issue in the hush money case may well fall into the category of what the Supreme Court called nonofficial, personal actions for which a president can still be prosecuted.

The former president is also likely to argue that some evidence used during the trial involved his official conduct and should have been excluded, based on the Supreme Court ruling.

More on the Trump Jan. 6 case

The latest: [What is presidential immunity?](#) The Supreme Court ruled that former president [Donald Trump is immune from prosecution](#) for his “official acts” in office. Here are key [takeaways from the Supreme Court’s immunity decision](#) and what’s next in [Trump’s case with special counsel Jack Smith](#).

The trial: The [Supreme Court’s immunity decision](#) likely means that Donald Trump’s federal trial can eventually proceed in D.C., but only after additional delay. The [March 4 trial date was taken off the calendar](#) and jury selection was postponed indefinitely.

The charges: [Trump pleaded not guilty to charges that he plotted to overturn the 2020 election](#) in the run-up to the Jan. 6, 2021, attack on the U.S. Capitol. Here’s a [breakdown of the charges against Trump](#) and what they mean, and [things that stand](#)

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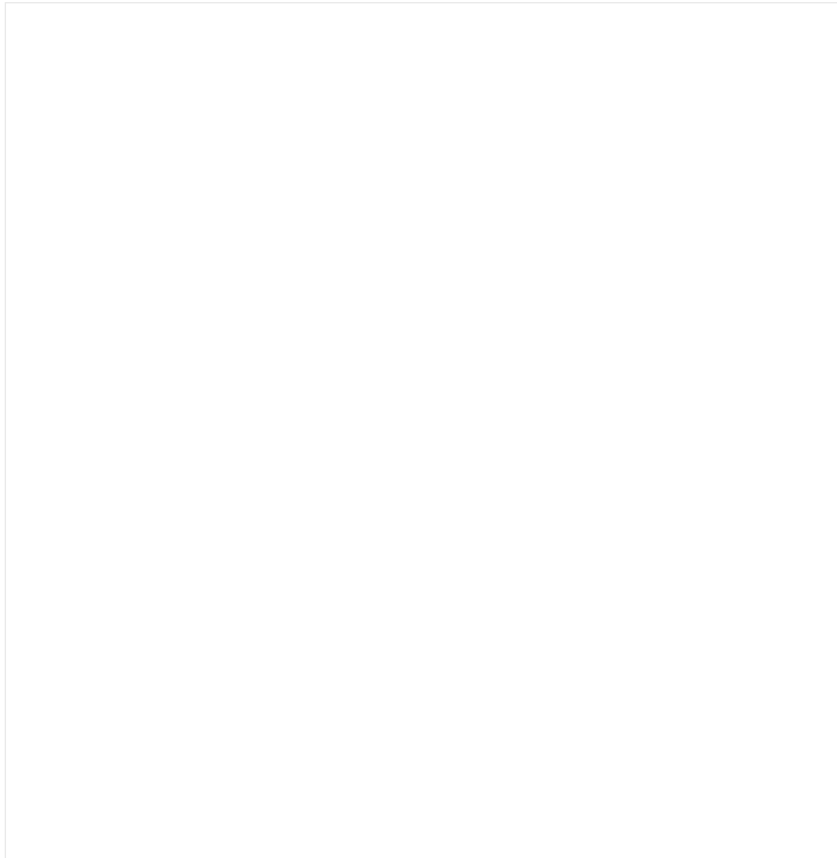


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