



HARVARD MODEL CONGRESS 2014

SURVEILLANCE: THE ISSUE OF PROTECTING OUR NATION AND OUR PRIVACY

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INTRODUCTION

In May 2013, the British newspaper *The Guardian* published a series of stories regarding the surveillance techniques of the National Security Agency (NSA), an organization under the jurisdiction of the Department of Defense. These leaks were later revealed to come from Edward Joseph Snowden, a contractor on leave from the NSA in Hong Kong under the pretense of treating a case of epilepsy.

Among the information that Mr. Snowden revealed were two programs run by the NSA: **PRISM**, a data-mining program, and **MAINWAY**, a system that collects metadata for calls made through the two largest telephone carriers in the United States: AT&T and Verizon, as well as Boundless Informant, a software program used by the NSA to visualize their data mining efforts.

Since the revelations, the theme of public surveillance has become extremely popular and relevant in national discourse. The discussion tends to center on the debate between the privacy of an individual and their Fourth Amendment rights, and the collective security of the nation and its citizens.

To a large degree, the public has accepted that security may sometimes come at the expense of some sort of personal liberty, but the extent to which this is the case is still under debate.

The government has a responsibility to lead and to act in the best interests of its citizens. What those interests are, however, are not always clear.

EXPLANATION OF THE PROBLEM

*A Brief History of Surveillance in the
United States*

1952-1978: Early Surveillance

The National Security Agency was formally created in 1952 under the orders of former US President Harry S. Truman, as a way to improve upon its predecessor, the Armed Forces Security Agency.

During its early years, the NSA was primarily involved in collecting data and addressing US security concerns from overseas actors, along with the CIA. For the most part, the FBI was in charge of surveillance of US citizens, which it began doing in earnest during the Civil Rights Movement, as evidenced by President Kennedy's authorization of wiretaps on Martin Luther King Jr.'s home and office in October of 1963 (Stanford University).

Domestic surveillance continued to gain prominence within the FBI with the rise of its **Counter Intelligence Program (COINTELPRO)** between 1956 and 1971, which had the stated directive to "expose, disrupt, misdirect, discredit, or otherwise

neutralize” organizations or individuals whose intentions were considered to be against the best interests of the United States (Federal Bureau of Investigation). The program, which upon its revelation was greatly criticized for its invasion of First Amendment rights, consisted of a series of wiretaps, covert intelligence reports on specific individuals, infiltration, psychological warfare, legal harassment, and illegal use of force (Blackstock 1975).

Meanwhile, during the Vietnam War, the CIA was involved in its own investigation of domestic unrest, running parallel to COINTELPRO. Codenamed **Operation CHAOS**, this program was closed in 1973 and was exposed in 1974 by Seymour Hersch of the New York Times, raising similar questions of the legality, not to mention constitutionality, of the programs being run by the organizations whose purpose it was to protect the nation and its citizens. In 1972, the US Supreme Court in *United States v. United States District Court, Plamondon*, found warrantless **wiretapping** to be in violation of Fourth Amendment rights against search and seizure.

1978-September 11, 2001: FISA

To prevent further scandals similar to COINTELPRO or Operation CHAOS, in 1978, President Carter signed the **Federal Intelligence Surveillance Act (FISA)**, a law that attempted to generate a series of regulations on the domestic collection of information. Specifically, it outlines the protocol required to obtain judicial authorization for the surveillance and search of those suspected in acting on behalf of a foreign government against the interests of the United States, be it through espionage or international terrorism, while still maintaining the secrecy and delicacy that come with dealing with terrorist actors (Federation of American Scientists).

Under FISA, the federal government was permitted to conduct electronic surveillance, physical searches, **pen registers**, and to access

relevant business records on non-American suspects for up to a year without a court order. It also allowed a limited exception for surveillance on communications involving a US citizen, legal resident, or corporation, provided court authorization could be acquired within 72 hours after commencing surveillance. To receive a warrant permitting the government to continue surveillance operations beyond the allotted timeframe of 72 hours, FISA courts must find probable cause that the person or persons are targeted “foreign powers” or agents thereof.

FISA’s limitation against the surveillance of non-state actors, or individuals working independently of a particular country, seems to reflect the priorities of the time, specifically during the Cold War. However, today terrorism tends to be associated with non-state actors, such as Al-Qaeda or the Revolutionary Armed Forces of Colombia (FARC), whereas FISA focuses solely on the surveillance of deemed terrorist groups working on the behalf of another nation. This provision stayed until FISA was amended in 2004 to include a so-called “Lone Wolf” provision, which permitted the United States to conduct surveillance on non-US citizens, legal residents, or corporations that are believed to be engaging or preparing to engage in international terrorism.

In the aftermath of FISA, there were no serious challenges to its constitutionality.

September 11, 2001-Present-Day: The War on Terror

Since September 11, FISA has become increasingly more prominent on the political stage. The Patriot Act expanded the jurisdiction of FISA to include surveillance of US citizens, and in 2004, as mentioned in the previous section, the requirement that non-US surveillance targets be representing a foreign government was dropped. The Supreme Court considered no significant challenges to the constitutionality of these additional provisions,

though in 2012 in *United States v. Jones* it declared that the physical positioning of a GPS device on the defendant's car constituted a "search" under the Fourth Amendment (SCOTUSBlog).

From 2001 to 2007, President George W. Bush authorized the NSA to conduct unwarranted surveillance operations on those in the United States, provided that the communication also included a party that the NSA believed to be outside of the United States. The program was greatly criticized by the general public, and despite the fact that the Bush Administration claimed it was acting legally, in January 2007 these operations were ceased.

That same year, the controversial Protect America Act removed the requirement of a warrant for surveillance of targets located outside of the United States, a controversial measure that also allowed for wiretapping of US citizens believed to be communicating with foreign terrorists, and allowed data mining of US citizens for the purposes of gathering intelligence information. In 2008, the FISA Amendments Act relaxed many of the requirements set forth in previous legislation, and permitted the NSA to engage in programs such as PRISM for the purposes of foreign surveillance (GovTrack).

Recent Developments

For the most part, the issue of surveillance disappeared in 2008 during the financial crisis, and did not resurface until mid-2013.

In June of that year, an NSA contractor by the name of Edward Snowden disclosed to *The Guardian's* Glenn Greenwald the nature of two of the NSA's surveillance programs: PRISM, which collects data from US service providers, such as Google, and Project MAINWAY, which generates metadata from the phone registries of Verizon and AT&T. The two programs were revealed through the use of an NSA Top Secret internal slideshow. One

particular slide lists the following dates for when PRISM collection began for each service provider:

September 11, 2007: Microsoft
March 12, 2008: Yahoo
January 14, 2009: Google
June 3, 2009: Facebook
December 7, 2009: PalTalk
September 24, 2010: YouTube
February 6, 2011: Skype
March 31, 2011: AOL
October 2012: Apple

The document also includes Dropbox as a potential future contributor.

According to *the Guardian's* June 6 release, PRISM permits the NSA "direct access to the companies' servers", implying corporations need not even hand information over, even though they are already legally required to do so if requested. According to the slideshow, PRISM allows for the collection of everything from emails to chat to file transfers to even videos and photos of the targeted groups.

Critically, the NSA justified its PRISM program by saying that, though previously FISA authorization was required for any communication including a US citizen or occurring through a US company, that the provision could be ignored if the only form of US involvement was in the infrastructure being used — such as a US telephone cable connecting an individual in Iran with an individual in Venezuela. By instead redefining FISA provisions to require warrants only for individuals who are not "reasonably believed" to be outside of the United States, the NSA was instantly capable of accessing millions of communications daily that previously would have required individual authorization.

Intelligence reports have flourished since the implementation of PRISM: in all, approximately 77,000 reports have cited the previously clandestine program.

Both the National Security Agency and President Obama have fervently defended the legality of programs like PRISM, though the broader question in the public eye has become whether the programs should be legal in the first place.

Domestic Fallout

The sudden release of all of these programs after six years of secrecy caused significant fallout in the public eye and within Congress. Much of that fallout was aimed at President Obama, who previously had held an image of improved transparency and fewer wiretappings. Ari Fleischer, President Bush's press secretary, went as far as claiming Obama was "carrying out Bush's fourth term" (POLITICO).

Some of the response, however, was simply confusion over the news. At a press conference, Senate Majority Leader Harry Reid said, "Everybody should just calm down and understand that this isn't anything that's brand new, it's been going on for some seven years, and we have tried often to try to make it better and work and we will continue to do that" (CBSNews).

International Fallout

Given the NSA's fervent assurances that surveillance is acceptable because it is being conducted almost exclusively outside of the United States, the revelations have garnered much attention abroad.

In many ways, the fact that the United States has been engaging in significant espionage efforts against other nations is nothing new, and many countries, such as Switzerland, have taken a rather matter-of-fact view on the subject: the Swiss data protection commissioner Hanspeter Thür, for instance, went on the record as saying "There is little to nothing that we can do about it because even Swiss people give consent to hand over their

data to US companies. People should be aware that once they have signed the terms and conditions their personal data will end up in the US."

Other nations have been less forgiving of programs like PRISM and MAINWAY. The European Union in particular has been fervently opposed to these programs, with nations like France at one point threatening to postpone negotiations over a proposed US-EU Free Trade Agreement (FTA). The European Commission warned the United States that their firms could start shying away from US service providers in the future, however, due to privacy and security concerns for their users (The Guardian).

Europe, however, is far from the most spied-upon region in the world. As Glenn Greenwald revealed to Brazil's *O Globo*, Brazil is the second most spied-upon nation in the world, after only the United States. Closely following Brazil in the rankings are other South American nations like Colombia, Venezuela, and US neighbor Mexico.

At first glance, Brazil's placement on the list appears to make little sense. Approximately 2.3 million telephone calls and text messages were monitored in January alone. Indeed, Brazil's response has been extremely negative: the Foreign Ministry released a statement in the wake of the announcement expressing its "grave concern" over the revelations. President Rousseff responded to the revelation by urging Congress to pass an Internet Bill of Civil Rights that has been stalled on the floor since 2011. This bill would establish human rights, guarantees, and duties for Brazil's citizens on the web that would work to prevent the NSA from continuing to monitor phone conversations on legal grounds (Al Jazeera).

The NSA justifies its monitoring of Brazil not because of its propensity to develop terrorists capable of attacking the United States, but rather because of Brazil's role as a major telecommunications hub for the entire region.

As the most populous nation on the continent and the fifth-most populated on the planet, Brazil, the NSA maintains, is a logical target for a large level of data collection.

The NSA explains its surveillance of Colombia because of its role as the United States' top military ally in the region, to be able to monitor drug trafficking and the movements of the FARC guerilla group. In Venezuela, the NSA spies on the oil industry and the military, as well as drug cartels and political developments in Mexico.

However, that does not mean Brazil, or the rest of Latin America, is any sort of military target. The director of the NSA, General Keith Alexander, had this to say on the topic of foreign surveillance (The New Yorker):

You know, the reality is we're not collecting all the e-mails on the people in Brazil nor listening to their phone numbers. Why would we do that? What somebody took was a program that looks at metadata around the world that you would use to find terrorist activities that might transit and leaped to the conclusion that, aha, metadata — they must be listening to everybody's phone; they must be reading everybody's e-mail. Our job is foreign intelligence.

I'll tell you, 99.9 and I don't know how many nines go out of all that, whether it's in German or Brazil, is of no interest to a foreign intelligence agency. What is of interest is a terrorist hopping through or doing something like that.

Of course, this may be interpreted both positively and negatively: on the one hand, it means that Brazil, and other nations, are not being implicated in significant coordinated planned attacks against the United States. On the other hand, however, it means that the NSA is conducting types of surveillance, that we have already determined go beyond our individual rights as citizens, on a massive scale on individuals all around the world, for no justification beyond "just in case."

Congressional Action

As of the publishing of this briefing, Congress has not made any legislation in response to the public revelation of PRISM and MAINWAY.

The FISA Court on July 20 renewed the NSA's authorization to collect telephone data as part of Project MAINWAY (CNN).

FOCUS OF THE DEBATE

Congressional View

Congress's failure to respond to the revelations of these NSA programs is not for lack of trying. On July 25, Representative Justin Amash (R-MI) introduced to the House floor an amendment that would have stopped the NSA's collection of telephone metadata.

Though the amendment was ultimately shot down, it was an extremely close vote, with 205 in favor and 217 against in a nonpartisan vote.

Presidential View

President Obama is in support of Projects MAINWAY and PRISM, having been well aware of their existence before the public revelation. Not surprisingly, then, the White House was adamantly against the Amash Amendment, calling it a "blunt" approach to the issue. President Obama has welcomed the debate about surveillance, saying that these programs are legal, and that the American people are encouraged to voice their opinions about the program in order to determine what is the best course for America to take.

POSSIBLE SOLUTIONS

As opposed to other issues debated in the CIA and in Congress, the issue of surveillance is one that does not necessarily require action

or legislation. Rather, the debate generally tends to focus on the balance between security and privacy, two ideals that are universally supported but may be, to an extent, mutually exclusive. For this reason, solutions could center on increasing surveillance, decreasing it, or doing nothing.

Doing Nothing

Given the media attention that has been given to the issue of surveillance over the last decade, it appears as though inaction is an untenable position. That said, surveillance has only expanded in scope since the beginning of the century. President Obama appears content with the current NSA setup, and has expressed no interest in enacting any changes to the systems. Though inaction can be an unappealing position to take, it is not unheard of.

Revoking the NSA License for Surveillance

In this scenario, Congress, a FISA court, the CIA, or the President would revoke the NSA's license to conduct programs such as PRISM and MAINWAY. Under this system, the NSA or the CIA would be entrusted with the task of monitoring potential terrorist attacks on the United States through less invasive means and more traditional espionage techniques.

It is this exact scenario that would have taken place had Congress voted in favor of the Amash amendment (and by enough of a margin to override President Obama's likely veto). This course of action would not only calm public outrage against the current Administration, but would also help to restore the US's position in the international community after Project PRISM gave nations more cause to be wary of US interests.

Expanding Surveillance

The fact of the matter is, despite the seemingly immense processing powers of Projects PRISM and MAINWAY, US surveillance programs cannot be used to individually target US citizens, and a citizen indeed has no need to fear being implicated by the program if they have nothing to hide. Indeed, they cannot be implicated in any crime unless it is some sort of international terrorist plot, implying that a Facebook chat about underage drinking or pirating music – what may be the everyday citizen's biggest secret from the government – will be lost in the vast database of the NSA.

Furthermore, despite the fact that the President has claimed these programs have saved lives, the fact of the matter is there are still major crimes that the government may have been able to prevent had their surveillance capabilities only been stronger or more far-reaching. Organized attacks against US citizens such as the Boston Marathon bombings or school shootings could conceivably be stopped if the right emails and phone conversations are searched and spied upon. Though we hate it when the US government listens in on our phone calls, we cannot deny that it has the potential to help save our own lives.

QUESTIONS FOR POLICYMAKERS

Edward Joseph Snowden, the former NSA contractor that made the initial revelations about PRISM and MAINWAY, has, through his actions since June 2013, raised additional discussions, such as Americans' views on whistleblowers, national security secrets, and even national sovereignty.

On May 20, 2013, on leave from the NSA under the pretense of seeking treatment for his epilepsy, Snowden flew to Hong Kong, where he stayed until June 24, roughly two weeks after revealing himself to be the whistleblower that had provided newspapers around the world with NSA files. On that date, Snowden flew to Cuba via Moscow, but

appeared to miss his connection to Havana, forcing reporters onto a twelve-hour flight that he himself did not board.

On July 3, Bolivian president Evo Morales's plane from Moscow to La Paz was suddenly diverted and forced to land in Austria after rumors of Snowden's presence on the plane spread throughout the European Union. Within the next three days, Venezuela, Nicaragua, and Bolivia all offered Snowden asylum in their countries, though without a passport Snowden was incapable of accepting their offer.

At the time of this writing, Snowden remains in Russia, having requested temporary asylum in Russia with the intentions of staying in the country for a few months before eventually travelling to Latin America. However, though Snowden appears to be intent on laying low for the foreseeable future, his actions have brought about questions that, though broad in scope, are intricately connected with the topic of Internet surveillance.

For one, it is as of yet unclear as to how much, if any, real damage Mr. Snowden has done to US security concerns. According to Glenn Greenwald, the amount of information Edward Snowden has on the NSA "would allow somebody who read them to know exactly how the NSA does what it does, which would in turn allow them to evade that surveillance or replicate it" (Business Insider). According to the book *Deep State: Inside the Government Secrecy Industry*, by Marc Ambinder, the NSA's most powerful secrets are not what it knows, but "what we know about everyone else's secrets and how we came to know them." As former President George W. Bush told CNN's Robyn Curnow, "I know he damaged the country."

Indeed, it is easy to feel uncomfortable with the potential danger Snowden could pose to the United States. Despite Snowden's assurances that he is immune to torture ("I cannot be coerced into revealing that information, even under torture"), it appears

extremely unlikely that Snowden, who has never received military training and may have left Hong Kong for fear of losing Internet connection (*The Globe and Mail*), can be trusted with keeping quiet, particularly given his recent history of maintaining state secrets. Furthermore, it is not clear whether or not he has handed over his four laptops and their contents to either Russia or China, arguably the United States' two biggest intelligence rivals in the world. Indeed, it appears almost naïve to believe that China would allow Snowden to leave Hong Kong without having seen his data, or that the KSB would not have extensively interviewed Snowden during his time in the Moscow International Airport.

However, it is possible that Edward Snowden is incapable of revealing the NSA's most heavily guarded secrets. One US intelligence official claims that Snowden has no access to what are known as ECIs, or Extremely Compartmentalized Information, and pointed out that "just because you have the blueprints doesn't mean you have the manual."

The amount of damage that Snowden has done to the United States is intricately linked to Americans' perception of whistleblowing, and, in turn, the NSA. Indeed, this perception appears to have shifted away from Edward Snowden and towards the NSA in recent months. A poll conducted by the Washington Post and ABC News released on July 24, 2013 shows that 53% of Americans support charging Snowden with a crime, against the 36% who oppose. This contrasts sharply with the same poll taken immediately after Snowden's initial interview, when only 43% of Americans approved of charging him with a crime. Additionally, immediately following the initial interview, there was a White House petition to pardon Edward Snowden, which took only two weeks to reach 100,000 signatures but only accrued 38,000 in the following month. Meanwhile, the same poll found the public believes the government should prioritize the investigation of potential

terrorist threats over privacy rights by a margin of 57% to 39%.

This shift in perception reflects what appears to be a very fluid view on whistleblowing in general. The initial reaction seems to have been positive, celebrating the fact that information had been made public. As soon as that information began to threaten US interests, this approval disappeared.

The saga of Edward Snowden also touches upon the issue of national sovereignty. When Evo Morales was forced to make an emergency landing in Austria because of a false rumor that Snowden was on board, nations in Latin America were outraged, citing diplomatic immunity and the immense disrespect that was shown towards a head of state. Morales threatened to close the Bolivian embassy in Washington during a meeting held with the presidents of Venezuela, Ecuador, Argentina, Uruguay, and Suriname, which was dedicated exclusively to the incident. The presidents demanded an official apology from the nations of France, Italy, Portugal, and Spain (USAToday).

This diplomatic dispute, however, is a simple reflection of the issue of national sovereignty. The fact that the NSA has managed to garner such vast databases of information while still limiting its surveillance of US citizens means the NSA has been conducting espionage on citizens all over the world, with no just cause beyond the suspicion they might find information leading to the prevention of a terrorist attack on the United States.

CONCLUSION

To what extent should we prioritize security over privacy, or vice versa? Are some rights non-negotiable? There is no right answer to this debate: it simply revolves around the question of balance. It implies we need to have a healthy debate on the issue.

These debates are not easy. But they are necessary to have, for the good of the nation and its people. Delegates, you are given a difficult task. But come to debate with a sharp mind and a strong heart, and the entire nation will thank you.

GUIDE TO FURTHER RESEARCH

For more information in your research, I strongly recommend you browse through the main news websites, like CNN, Al Jazeera, and the Washington Post. The latter two, as well as The Economist, offer especially insightful op-eds that might prove to be extremely helpful when forming to your agent's reflections on the issue. One website that is exceptionally adept at explaining difficult issues in an easy-to-understand way is Business Insider, and despite its role as a website dedicated to the corporate world, it has covered the Edward Snowden saga very well.

Above all, I recommend you enter your research, and debate with an open mind. It is easy to read about how the government is spying on your every phone call and feel uncomfortable, or justifiably angry. It is similarly easy to consider a world in which privacy takes precedence over one's personal safety, and feel uncomfortable about the government's priorities. However, regardless of your view, be sure to consider both viewpoints, and to seriously consider alternative ways of keeping the nation secure that would also grant individuals the privacy they seek. This is obviously no easy task, but that's why you came to the CIA.

GLOSSARY

COINTELPRO - FBI counterpart to Operation CHAOS, similarly discontinued in the early 1970s

FISA - 1978 law that established the protocol for electronic surveillance in the United States. Was amended heavily following the September 11, 2001 attacks

MAINWAY - Current NSA program that gathers metadata on telephone usage in the United States from Verizon and AT&T. Existence revealed by Edward Joseph Snowden in June of 2013

Operation CHAOS - 1960s espionage project of the CIA that was discontinued in 1973. Represents an early form of government surveillance

pen registers - A device that records all numbers dialed from a particular telephone line. Legally permitted, provided one follows FISA provisions

PRISM - Current NSA program that collects usage activity from US service providers such as Google and Facebook. Existence revealed by Edward Joseph Snowden in June of 2013.

wiretapping - The act of third-party monitoring of telephone conversations. For the purposes of this debate, it can be assumed that all wiretapping will take place by the US government

BIBLIOGRAPHY

Blackstock, Nelson, and Cathy Perkus. *Cointelpro: The FBI's Secret War on Political Freedom*. New York: Monad, 1975. Print

"COINTELPRO." *FBI*. N.p., 2013. Web. <<http://vault.fbi.gov/cointel-pro>>

Condon, Stephanie. "NSA's Verizon Records Collection: 'Calm Down,' Reid Says." *CBSNews*. CBS Interactive, 6 June 2013. Web. <[\[250_162-57588058/nsas-verizon-records-collection-calm-down-reid-says/\]\(http://www.cbsnews.com/8301-250_162-57588058/nsas-verizon-records-collection-calm-down-reid-says/\)>](http://www.cbsnews.com/8301-</p>
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Cratty, Carol. "Court Renews Secret U.S. Surveillance Program." *CNN*. Cable News Network, 20 July 2013. Web. <<http://edition.cnn.com/2013/07/19/politics/nsa-surveillance>>

Dalbert, Paula. "Brazil Eyes Internet Bill amid Spying Leaks." *Features*. N.p., 14 July 2013. Web. <<http://www.aljazeera.com/indepth/features/2013/07/2013713172929909896.html>>

"Federal Bureau of Investigation (FBI)." *Federal Bureau of Investigation (FBI)*. Stanford University, 2013. Web. <http://mlk-kpp01.stanford.edu/index.php/encyclopedia/encyclopedia/enc_federal_bureau_of_investigation_fbi/>

"Foreign Intelligence Surveillance Act." *Federation of American Scientists*. N.p., 14 June 2013. Web. <<https://www.fas.org/irp/agency/doj/fisa/>>

Greenwald, Glenn, and Ewen MacAskill. "NSA Prism Program Taps in to User Data of Apple, Google and Others." *The Guardian*. Guardian News and Media, 06 June 2013. Web. <<http://www.guardian.co.uk/world/2013/jun/06/us-tech-giants-nsa-data>>

Greenwald, Glenn, Roberto Kaz, and José Casado. "EUA Espionaram Milhões De E-mails E Ligações De Brasileiros." *O Globo*. N.p., 6 July 2013. Web. <<http://oglobo.globo.com/mundo/eua-espionaram-milhoes-de-mails-ligacoes-de-brasileiros-8940934>>

Hersch, Seymour. "Huge C.I.A. Operation Reported in U.S. Against Antiwar Forces (Dec. 22, 1974)." *Huge C.I.A. Operation Reported*

in U.S. Against Antiwar Forces (Dec. 22, 1974).
New York Times, 22 Dec. 1974. Web

“H.R. 6304 (110th): FISA Amendments Act of 2008.” *GovTrack.us*. Rep. Silvestre Reyes [D-TX], 19 June 2008. Web.
<<http://www.govtrack.us/congress/bills/110/hr6304>>

Ingersoll, Geoffrey. “Edward Snowden Declares Himself Torture-Proof.” *Business Insider*. N.p., 16 July 2013. Web.
<<http://www.businessinsider.com/snowden-declares-immunity-to-torture-2013-7>>.

Kelly, Michael. “It Is Now Abundantly Clear Why Edward Snowden Is The US Government’s ‘Worst Nightmare’” *Business Insider*. N.p., 15 July 2013. Web.
<<http://www.businessinsider.com/snowden-has-nsa-blueprints-2013-7>>.

Lizza, Ryan. “What the N.S.A. Wants in Brazil.” *The New Yorker*. N.p., 24 July 2013. Web.
<<http://www.newyorker.com/online/blogs/newsdesk/2013/07/why-the-nsa-really-cares-about-brazil.html>>

Mahoney, Jill, and Ann Hui. “The Globe and Mail.” *The Globe and Mail*. N.p., 24 June 2013. Web.
<<http://www.theglobeandmail.com/news/world/edward-snowden-still-on-the-run/article12773353/>>

Mullen, Jethro. “CNN Exclusive: George W. Bush on AIDS, Mandela, Snowden and His Legacy.” *CNN*. Cable News Network, 02 July 2013. Web.
<http://edition.cnn.com/2013/07/01/politics/bush-interview/index.html?hpt=hp_t2>

“Public and Private Laws Legal Status and Use of Seals and Logos.” *The US Government Printing Office*. N.p., 25 Oct. 1978. Web

Risen, James. “Federal Judge Finds N.S.A. Wiretaps Were Illegal.” *The New York Times*. N.p., 31 Mar. 2010. Web.
<<http://www.nytimes.com/2010/04/01/us/01nsa.html>>

Thrush, Glenn. “POLITICO.” *POLITICO*. N.p., 6 June 2013. Web.
<<http://www.politico.com/story/2013/06/nsa-phone-records-obama-george-bush-92352.html>>

Traynor, Ian. “European Firms ‘could Quit US Internet Providers over NSA Scandal’” *The Guardian*. Guardian News and Media, 04 July 2013. Web.
<<http://www.guardian.co.uk/world/2013/jul/04/european-us-internet-providers-nsa>>

“United States v. Jones.” *SCOTUSblog*. N.p., 2012. Web. <<http://www.scotusblog.com/case-files/cases/united-states-v-jones/>>

Valdez, Carlos, Paola Flores, Vivian Sequera, Mario Sibaja, Bradley Books, and Luis A. Henao. “Rerouted Morales Plane Has South American Leaders Irate.” *USA Today*. Gannett, 5 July 2013. Web.
<<http://www.usatoday.com/story/news/world/2013/07/05/south-american-leaders-back-morales/2490925/>>