

January 12, 2018

Dr. Carla D. Hayden, Librarian of Congress
Dr. Mary B. Mazanec, Director, Congressional Research Service
101 Independence Avenue, S.E.
Washington, DC 20540-1000

Dear Dr. Hayden and Dr. Mazanec:

As current and retired attorneys and analysts at the Congressional Research Service, we thank you for your leadership of the Library of Congress and of CRS. We write to raise issues and opportunities regarding CRS's approach to its objectivity and saliency in today's political environment. Whirlwinds of information and disinformation threaten democracy, but CRS is situated to sort out the truth where it counts. We believe CRS can, and should, do so even more effectively. Our suggestions include a commission leading to the development of sound guidelines on evaluating and utilizing information to better implement our mission and defend our work in serving the Congress.

I. Background

As you know, the current climate of “alternative facts,” “fake news,” conspiracy theories, and declining trust in a common reality poses problems for the United States' political system. While technological and social trends increase the need for information literacy, people across the political spectrum do not know where to turn for reliable information. Many end up in polarized “bubbles.” These trends threaten democracy, in part by eliminating shared factual grounds on which people and their legislators can debate, compromise, and seek consensus.¹ In this climate, CRS's mission has never been more vital. CRS is tasked by law with “the *analysis, appraisal, and evaluation* of legislative proposals” without partisan bias.² The Library states that “CRS serves the Congress ... by providing comprehensive and reliable legislative research and analysis that are timely, objective, authoritative and confidential, thereby contributing to an informed national legislature.”³

We are concerned that CRS risks falling short of its mission if it holds back the independent analysis that Congress has directed us to provide. Sparking our concern, CRS has appeared to avoid reaching conclusions in some topic areas with high potential for political controversy. In some such topic areas, CRS operates as a neutral compiler of facts and opinions, with little of the expert analysis, appraisal, and evaluation of their credibility that Congress requires. CRS also seems to have avoided a few topics or facets of topics almost entirely. Yet these risk-avoidant strategies, while certainly understandable, could in fact increase other risks such as under-utilizing CRS's valuable personnel; contributing to polarization; and, ironically, inviting a perception of partisan bias. Perhaps worse, given the mission of CRS, is the risk of a slow slide into irrelevance.⁴

If CRS fails to maintain its strong roots in sound, well-reasoned objectivity, we fear it could be swept along in political currents, diminishing its ability to serve Congress and even contributing to dangers to our constitutional democracy. On the other hand, CRS remains well-positioned to emerge as an even more trusted source for timely, objective, authoritative information and analysis for Congress. This is especially true if the Library of Congress and its component CRS collaborate effectively on actions: CRS could both benefit from, and enhance, the Library's trustworthiness and its work promoting information literacy.

II. CRS Can Optimize Its Current Approach to Objectivity

Several current tendencies suggest that CRS can better adapt its objectivity practices to today's divisive political climate, within the scope of its statutory mandate. Doing so is particularly important for congressional distribution products. CRS may face fewer objectivity issues with confidential or unwritten responses, but they offer a complete and clear picture only to some requesters; thus, shifting to more confidential or unwritten responses can reduce the value of our work and compromise our mission. The tendencies that we observe can reflect pressures from *any* party or faction, although pressure is likely greater from a congressional majority. (We emphasize that this review of dynamics that operate at the institutional level is not intended to impugn the excellence of any CRS products or analysts.)

First, CRS cannot cover every possible topic, nor every nuance of topics that we do cover. Nonetheless, failure to cover major topics or major aspects of topics has the potential to mislead by omission. We should be more conscious of the potential of such omissions to misdirect Congress's attention, to "cover up" for one side of an issue, or to paint a picture that is not as complete and accurate as it should be. One possible illustration is the scarcity and relatively low prominence of CRS writings on efforts, amplified by Russia, to exploit discord and weaken our democracy.⁵ Other current topics that many (including many in Congress and from both major parties) view as important to Congress also appear to be under the radar at CRS.gov. These include widespread, bipartisan recognition of the President's manifest disregard for truth and decorum; conflict-of-interest lawsuits and allegations involving the Administration; the rise of white nationalism and other potentially destabilizing socio-economic trends; changes in legislative procedures and norms; and the general prospect of elements of democratic backsliding.⁶ These subjects have not appeared on the CRS.gov main pages, unlike "Infrastructure Investment" which was long deemed a "Hot Topic." Although the facts on these topics are independently verifiable and not partisan, seeming to downplay or ignore them—or even the existence of debate about them—favors certain political factions over others.⁷

Where CRS does take on controversial topics, it can do more to avoid the appearance of bias in how it covers them. In less-partisan areas, CRS analysts are freer to make connections, offer context, and provide expert insight into causes and effects. We can aim to make sense of things. In some areas claimed to be controversial, connections, context, and insight can be inhibited, making products less useful.⁸ Moreover, in some cases, shallow, disjointed, or euphemistic treatment of an issue benefits one side over another. The issue of climate change demonstrates this challenge.⁹ CRS did highlight the issue as a "Hot Topic" and has published superb products on it, none of which deny that it is occurring primarily due to human activity. However, CRS has missed opportunities to connect the dots for Congress on the diverse real-world *effects* of climate change, potentially biasing the debate toward inaction.¹⁰ CRS also dodges overt recognition of the influence of climate misinformation, despite concerns among scientists and work by social scientists suggesting that recognition of the misinformation is needed to inoculate audiences against false ideas.¹¹ More fundamentally, the vast scale of climate change risks and the influence of climate misinformation are objectively verifiable facts. CRS must not mute them for political reasons.¹² CRS can be mindful of the sensibilities of our clients without constraining or distorting our analyses in ways that result in biased impacts.¹³

Finally, CRS must avoid substituting forced ideological balance for the higher goal of objective truth. At times, we grant credence to ideas based on their support by the many or the powerful rather than on their support by facts or logic. We take it upon ourselves to estimate "the middle" and force our products to split anything "positive" or "negative" 50-50 on either side. To avoid writing any phrase that could possibly be taken out of context by the most ideologically driven readers, we water down our language and sacrifice clarity and utility in our products.¹⁴ When analysts do come to conclusions that some in Congress may dislike, using their expertise and independent judgment, the analysts

cannot be assured that CRS as an institution will stand by them.¹⁵ While these results are sometimes appropriate, CRS needs clear internal checks to avoid being swept along with trends in political rhetoric. Otherwise, CRS may find itself inadvertently normalizing the abnormal or abominable—“debate exists on whether the Emperor has clothes.” Because partisan positions and goalposts can shift without being driven entirely by new empirical facts, CRS must ensure that it maintains proper benchmarks *outside* of Congress and politics for what it considers objective analysis.¹⁶

III. Suggested Actions

Sectors of the media, as well as academia and other fields—and their critics—have grappled with questions of objectivity for some time. The Congressional Budget Office (CBO) and the Government Accountability Office (GAO) might offer valuable perspectives as well, and might be allies in the defense of independent, nonpartisan legislative services. CBO, in particular, prominently has come to conclusions in recent debates (such as on healthcare) that have dismayed some chiefly in one party or another.¹⁷ The relevance of the institution and its reputation for integrity, nonpartisanship, and analytical rigor appear at least as strong as ever.¹⁸ The experience of CRS and these other sectors and institutions could be shared among the agencies with the duty to “speak truth to power.”

One possible avenue for learning from such experience could be a blue-ribbon commission drawing from these sectors. It could focus on how entities aiming to be authoritative can refine our objectivity standards, resist pressures from polarization, and bolster our trustworthiness with diverse audiences. Ideally, it might result in transparent, public standards that CRS and other institutions could cite to defend our methods and resulting conclusions against pushback. The Library of Congress, as the nation’s principal repository of information, could be a prime candidate to host this type of event.

CRS also could do more internally, with the assistance of the Library and the input of employees, to recalibrate its objectivity practices without jeopardizing our reputation with any part of a polarized Congress. Doing so could unleash analysts’ ability to better apply their expert judgment and serve clients; boost morale; reduce reliance on unwritten consultations; and allow CRS to better keep pace with increasing complexity and rapid change. For example, CRS’s review processes, while indispensable, have a few distorting features. If any one of the three or more reviewers interprets a statement as possibly “controversial,” that statement may be significantly edited for “neutrality.” Writers may omit things in anticipation of such objections. Yet it is not necessarily the case that the broadest view of what is “controversial” is *always* the most objective, especially if it is not the view of the subject matter expert.¹⁹ Various steps could improve on the status quo.

- Review process guidance could clarify priorities and remind writers, reviewers, and managers to check at strategic points for things like potentially misleading omissions of facts or connections; unintended implications of chosen levels of abstraction or focus; overextended presumptions of good faith; or excessive forced balance.
- Mechanisms could prompt CRS to review our website and products to ensure that gaps do not give misimpressions to our congressional audience.²⁰
- More proactive coordination among CRS Divisions and levels of review, and a more iterative process with more author input, might also reduce the potential for apparent biases.²¹

Lastly, it would be wise for CRS to consider in advance where, if necessary, it will draw lines. Everyone at CRS surely assumes that CRS would push back against extreme and abhorrent actions, were they ever to be possibilities in our political system. However, it is unknown when pushback against less extreme, but still dangerous, actions might begin.²² In this time of great uncertainty, precautionary preparation can help avoid “too late” situations, however unlikely. The Library could offer invaluable aid in this project in its role as a “chief steward of America’s and the world’s record of knowledge, and ... springboard to the future.”²³

IV. Conclusion

CRS would benefit from your encouragement to evaluate its practices geared toward objectivity and saliency, because even beginning these discussions will not be easy. CRS's current approach has arisen out of legitimate concerns, including resource constraints.²⁴ Larger dynamics of distrust in technocratic elites also demand humility from any entity striving to be authoritative and objective. Nevertheless, we believe it is urgent for CRS, together with the Library, to "be bold, innovative and willing to take risks"²⁵—to stand more firmly as a bulwark against tribal epistemology and the fog of unknowability.²⁶ CRS is not alone in grappling with these issues in this era of information overload and "alternative facts," and carefully engaging these topics with others could benefit our analysts and managers and, ultimately, our congressional clients. Updated policies and guidelines could enable CRS to better fulfill its mission, insulate its analyses from political pressures, and maintain its relevance. We must not be neutral as to our own trustworthiness and leave power as the arbiter of truth in the United States. CRS should lean into its role, befitting its place within the larger Library, to help weave threads of facts and essential values into a fabric of understanding for Congress.

We would be happy to discuss these matters with you at your convenience. The primary author can be reached at awyatt@crs.loc.gov, andie.wyatt@gmail.com, or (202) 707-0816; additional supporters are listed in the Appendix. Thank you very much for your consideration, and for your dedication to the Library and the Congressional Research Service.

Sincerely,

Alexandra M. Wyatt
Legislative Attorney, American Law Division
Congressional Research Service

Additional supporters listed in Appendix

cc: T.J. Halstead, Deputy Director, Congressional Research Service
Karen Lewis, Assistant Director, American Law Division, Congressional Research Service



*Upon this age, that never speaks its mind,
This furtive age, this age endowed with power
To wake the moon with footsteps, fit an oar
Into the rowlocks of the wind, and find
What swims before his prow, what swirls behind —
Upon this gifted age, in its dark hour,
Rains from the sky a meteoric shower
Of facts . . . they lie unquestioned, uncombined.
Wisdom enough to leech us of our ill
Is daily spun; but there exists no loom
To weave it into fabric.*

—Edna St. Vincent Millay

Appendix

Name	Role
Pamela Baldwin	Federal Lands Consultant; Legislative Attorney, American Law Division (Retired)
M. Lynne Corn	Specialist in Natural Resources Policy, Resources Science & Industry Division (Retired)
Kevin Kosar	Vice President of Policy, R Street Institute; former Research Manager and Analyst in American National Government, Government and Finance Division
Robert Meltz	Special Counsel, Defenders of Wildlife; Legislative Attorney, American Law Division (Retired)
Morton Rosenberg	Legislative Attorney, American Law Division (Retired)

In addition to this list, a number of other supporters currently or formerly in CRS have endorsed this letter to the primary author as well, but wish to remain anonymous.

Notes and Selected References

¹ See generally, e.g., TIMOTHY SNYDER, *ON TYRANNY: TWENTY LESSONS FROM THE TWENTIETH CENTURY* (2017); Michael Gerson, *How Trump Broke Conservatism*, WASH. POST, Oct. 23, 2017, <http://wapo.st/2xiFW18> (“The alternative to reasoned discourse is the will to power.”); Simon Kaye and Clayton Chin, *Donald Trump’s Use of Post-Truth Double-Think Politics Is a Threat to Liberal Democratic Norms*, LONDON SCH. OF ECON. USCENTRE, Feb. 9, 2017, <http://blogs.lse.ac.uk/usappblog/2017/02/09/donald-trumps-use-of-post-truth-double-think-politics-is-a-threat-to-liberal-democratic-norms/>; Barbara Alvarez, *Public Libraries in the Age of Fake News*, PUBLIC LIBRARIES ONLINE (Nov./Dec. 2016), <http://publiclibrariesonline.org/2017/01/feature-public-libraries-in-the-age-of-fake-news/>.

² 2 U.S.C. § 166(d) (emphasis added).

³ CRS, About CRS: CRS History (2017), <http://www.crs.gov/aboutcrs/CRS-History>; Overview (2017), <http://www.crs.gov/AboutCRS/AboutCRS-Overview>.

⁴ See, e.g., Steven Aftergood, *Congress Isn’t Helping to “Rebuild” CRS*, FED’N OF AM. SCIENTISTS SECRECY NEWS BLOG, May 31, 2016, <https://fas.org/blogs/secrecy/2016/05/rebuild-crs/> (“Most public controversy concerning [CRS] revolves around . . . whether Congress should authorize CRS to make its reports publicly available . . . [A] more urgent question is whether CRS itself will survive as a center of intellectual and analytical vitality.”).

⁵ See, e.g., Matt Apuzzo and Michael S. Schmidt, *Trump Campaign Adviser Met With Russian to Discuss ‘Dirt’ on Clinton*, N.Y. TIMES, Oct. 30, 2017, <https://www.nytimes.com/2017/10/30/us/politics/george-papadopoulos-russia.html>.

⁶ Among many, many other readily available sources on these and other topics (such as the President’s apparent obstruction of justice), see Robert Mickey et al., *Is America Still Safe for Democracy? Why the United States Is in Danger of Backsliding*, FOREIGN POLICY, May/June 2017; Pippa Norris, *Is Western Democracy Backsliding? Diagnosing the Risks*, HARVARD KENNEDY SCH. FACULTY RES. WORKING PAPER SERIES (Mar. 2017), <https://research.hks.harvard.edu/publications/getFile.aspx?Id=1514>.

⁷ Indeed, CRS.gov can seem like it comes from some sedate alternative universe where today’s most pressing issues are absent. CRS’s perceived silence on topics could reward tactics like spreading confusion and claiming a growing range of topics as partisan policy matters, and could promote a lack of accountability. See PETER POMERANTSEV, *NOTHING IS TRUE AND EVERYTHING IS POSSIBLE: THE SURREAL HEART OF THE NEW RUSSIA* (2014). CRS’s (and perhaps the Library’s) credibility could even come into question. See Editorial, *Uncovering Emperor Trump*, USA TODAY (Aug. 3, 2017), <https://usat.ly/2vuAjiq> (citing SENATOR JEFF FLAKE, *CONSCIENCE OF A CONSERVATIVE* (2017)). CRS’s usefulness and relevance also could decline. Of course, if CRS’s silence contributes to inaction on substantive issues, that may hurt our democracy as well, as many from across the ideological spectrum recognize. See, e.g., Jack M. Balkin, *Constitutional Rot and Constitutional Crisis*, YALE L. SCH. PUB. L. RES. PAPER No. 605 (2017), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2993320.

⁸ See, e.g., Emma Dumain, *At Congressional Research Service, A Long History of Pointed Questions*, ROLL CALL, Nov. 28, 2012, <http://bit.ly/2hxjzP4> (describing 1990s history and more recent CRS actions in response to alleged controversies); Luke Rosiak, *Congressional Staffers, Public Shortchanged by High Turnover, Low Pay*, WASH. TIMES, June 6, 2012, <http://bit.ly/2hvw1in> (“The role of CRS . . . has also been rolled back.”); Christopher T. Hill, *An Expanded Analytical Capability in the Congressional Research Service, the General Accounting Office, or the Congressional Budget Office*, in *SCI. & TECH. ADVICE FOR CONGRESS* 106-117 (2003) (noting that CRS “tends to present the views of all interested parties as if they were of comparable validity, rather than to analyze each such view skeptically so as to arrive at the best understanding of an issue”).

⁹ In full disclosure, author Alexandra Wyatt received a counseling memorandum from the CRS Front Office disapproving of statements I made at a Federal Law Update seminar describing the scientific consensus behind the risks posed by climate change and the existence of a countervailing science-denying opposition. This letter does not contest the receipt of the memorandum. (However, this fact supports seeking coordinated, top-down assistance in recalibrating CRS’s approaches.)

¹⁰ The missed opportunities are most apparent in products that are framed as broad introductions to or overviews of issues. A report on EPA’s Clean Power Plan notes in the Introduction that “an overwhelming scientific consensus has formed around the risks, potentially catastrophic, of greenhouse gas-induced climate change,” but does not describe these risks in more than 40 additional pages—even in sections on why EPA issued the rule and what benefits it estimated. JAMES E. MCCARTHY ET AL., *CRS REPORT R44341, EPA’S CLEAN POWER PLAN FOR EXISTING POWER PLANTS: FREQUENTLY ASKED QUESTIONS* (Sep. 22, 2017), <http://www.crs.gov/Reports/R44341>. A report on emissions trends omits what greenhouse gases *do*. JONATHAN L. RAMSEUR, *CRS REPORT R44451, U.S. CARBON DIOXIDE EMISSIONS TRENDS AND PROJECTIONS: ROLE OF THE CLEAN POWER PLAN AND OTHER FACTORS* (May 31, 2017), <http://www.crs.gov/Reports/R44451>. Real-world climate impacts also are not among Clean Air Act issues facing the 115th Congress. JAMES E. MCCARTHY, *CRS REPORT R44744, CLEAN AIR ACT ISSUES IN THE 115TH CONGRESS* (Aug. 16, 2017), <http://www.crs.gov/Reports/R44744>. Climate has not been noted as a policy area potentially relevant to hurricane-related flooding. NATALIE KEEGAN AND CHARLES V. STERN, *CRS REPORT R40882, FLOODING EVENTS: CRS EXPERTS* (Sep. 6, 2017), <http://www.crs.gov/Reports/R40882?source=FeatureTopic>. See also RICHARD J. CAMPBELL, *CRS INSIGHT IN10781, HURRICANES AND ELECTRICITY INFRASTRUCTURE HARDENING* (Sep. 20, 2017), <http://www.crs.gov/reports/IN10781> (“The question of how much more system hardening is appropriate must be addressed in the context of the *perceived* risks from climate change” (emphasis added)).

¹¹ Confident falsehoods (intentional or not) can shove facts and reasoning out of their way to prevail in people’s minds, especially

without careful engagement. *See, e.g.,* Sander van der Linden et al., *Inoculating the Public against Misinformation about Climate Change*, 1 GLOBAL CHALLENGES 1600008 (Jan. 2017), <http://onlinelibrary.wiley.com/doi/10.1002/gch2.201600008/abstract>.

¹² Put simply, alarm is the objectively correct conclusion to be drawn from the abundant information that we have. While some information we gloss over does have policy implications, those implications make clarity *more* imperative: it is *important context* that our generation of humanity appears to be heading toward irrevocably degrading the biophysical foundations on which all organized human culture rests, which it is not uncommon to view as morally abhorrent.

¹³ Similar dynamics appear to play out in other arenas like health care and social programs, where morbidity, mortality, and financial results of different policies on Americans are given little depth (and procedural oddities unmentioned). They also seem to arise in the context of potential obstruction of justice by the President or his affiliates. For example, a pair of *Legal Sidebar* blog posts focuses narrowly on obstruction of justice criminal statutes, notwithstanding that this focus effectively takes a side: some have used the specificity of criminal provisions to excuse the Administration, while diverse critics of the Administration's actions correctly note that various conceivable congressional remedies are not based on the criminal code. Ben Harrington, *Obstruction of Justice Statutes: Legal Issues Concerning FBI Investigations, Specific Intent, and Executive Branch Personnel*, CRS LEGAL SIDEBAR (May 19, 2017), <http://www.crs.gov/LegalSidebar/details/1808>; *cf.* Approved Articles of Impeachment (1998), available at <http://wapo.st/2wvVL7M>.

¹⁴ One facet of this watering down of language is the abundant use of words such as “may,” “could,” “arguably,” and the like, which among other problems can reduce clarity on the relative likelihood or strength of conclusions.

¹⁵ *See, e.g.,* Dumain, *supra* note 8 (noting CRS withdrawal of report by analyst Tom Hungerford).

¹⁶ CRS colleagues have, at times, discussed facts among ourselves, but then admitted that we could not say the same facts to some of our clients—even in topic areas where we used to be able to speak more freely.

¹⁷ Democrats, for example, criticized CBO during the original debate over the Affordable Care Act (ACA) enactment for what they said was underestimating cost controls; Republicans, of course, have criticized CBO during the more recent debate over repeal of the ACA. *Criticism of the CBO is Hardly New Among Lawmakers*, ASSOCIATED PRESS, Mar. 14, 2017, <http://cbsn.ws/2xKc551>.

¹⁸ *See, e.g.,* Bartholomew D. Sullivan, *What is the CBO, and why does its ‘score’ on the Obamacare repeal matter?*, USA TODAY (Mar. 13, 2017), <https://usat.ly/2rSctUp> (“the CBO maintain[s] its reputation for impartiality and objectivity”). Every former CBO Director recently joined an open letter on the importance of CBO’s role in the legislative process. Dan L. Crippen et al., *Open Letter from Former CBO Directors to Hon. Paul Ryan et al.*, July 21, 2017, <https://medium.com/@douglas.elmendorf/letter-from-former-cbo-directors-on-the-importance-of-cbos-role-in-the-legislative-process-278863b7e1c6>.

¹⁹ Moreover, capitulating to popular distrust in scientists, economic analysts, journalists, and other experts of the sort found within and relied upon by CRS by treating them as controversial is a losing game—it merely confirms the distrust.

²⁰ It is particularly difficult to produce analyses when major legislation is rushed through in an apparent attempt to avoid analysis, such as has happened with the tax legislation. CRS needs a strategy to deal with such obstruction.

²¹ CRS and the Library might do well to defend the *processes* which, imperfect as they are, bring people closer to objectivity and truth than any alternative means. For example, climate change is established not by any red team-blue team debate, nor electorally, but by the scientific method. Budget scores are established by transparent and tested models that do not change based on party. News stories meeting journalistic standards go through certain fact- and source-checking steps before publication. And so on.

²² Public figures within, supporting, or seeking to make inroads in the U.S.’s major political parties already are aligned with viewpoints like Holocaust denialism and white nationalism, a fact CRS has been silent about so far. Will CRS continue to be so if these or other dangerous viewpoints gain more traction? *See, e.g.,* Andrew Aglin, *Daily Stormer* (Mar. 17, 2017), <https://donotlink.it/XOya> (neo-Nazi website founder Andrew Aglin writing in praise that “[Representative] Steve King is basically an open white nationalist at this point,” after King tweeted that “We can’t restore our civilization with somebody else’s babies”); Daniel Lombroso and Yoni Applebaum, *‘Hail Trump!’: White Nationalists Salute the President-Elect*, ATLANTIC, Nov. 21, 2016, <https://www.theatlantic.com/politics/archive/2016/11/richard-spencer-speech-npi/508379/>.

²³ LIBRARY OF CONGRESS, STRATEGIC PLAN FY2016 THROUGH FY2020: SERVING THE CONGRESS AND THE NATION (2015), https://www.loc.gov/portals/static/about/documents/library_congress_stratplan_2016-2020.pdf.

²⁴ Past experience such as the termination of the Office of Technology Assessment also, understandably, looms large.

²⁵ STRATEGIC PLAN, *supra* note 23.

²⁶ *See* Transcript of George W. Bush’s speech delivered Oct. 19, 2017 at the “Spirit of Liberty: At Home, In the World” event in New York, available at <https://www.politico.com/story/2017/10/19/full-text-george-w-bush-speech-trump-243947> (“[t]he major institutions of our democracy, public and private, [must] consciously and urgently attend to the problem of declining trust. . . . In short, it is time for American institutions to step up and provide cultural and moral leadership for this nation.”); Mike Mariani, *Is Trump’s Chaos Tornado a Move from the Kremlin’s Playbook?*, VANITY FAIR (Apr. 2017). In the words of one conservative, the current Administration’s message is that facts “needn’t have any purchase against a man who is either sufficiently powerful to ignore them or sufficiently shameless to deny them—or, in [Trump’s] case, both.” Sargent, *supra* note **Error! Bookmark not defined.** (quoting Bret Stephens).