



A Welcome from the Editor-in-Chief

Jansen VanderMeulen '19
Editor-in-Chief

If you had told me when I came to the Law School in August of 2016 that I would be anywhere near a leadership role in the student newspaper, I would have laughed at you—nervously, of course, because 1L is scary, and everything I did was accompanied by nervous laughter. I was involved with student government in undergrad and came to have a rather low opinion of most student journalism. Well, here we are. Just over a year and half later, I've taken the reins of the *Virginia Law Weekly* as its editor-in-chief. In that time, I have come to appreciate the power of a student newspaper to document and shape the community around it.

For seventy years, the *Law Weekly* has done just that. A search through our archives—conveniently available on Hein Online, thanks to the diligent efforts of our librarians—reveals the story of the Law School itself. Conflict and turmoil, debate and deliberation, revelry and merriment—and, of course, softball. Since 1948, the *Law Weekly* has made it our mission to serve as a neutral, open forum for the denizens of the Law School community. We publish the thoughts and opinions of students and faculty without regard to content or viewpoint. We edit only for grammar, style, and clarity.

This policy rose to the forefront this past week, my first as editor-in-chief. Many of you know that the *Law Weekly* published a law student's letter to the editor that made controversial claims about the immigration debate. The letter offended, disheartened, and outraged some students. In particular, students from underrepresented backgrounds told me they felt targeted and even threatened by the letter's tone and assertions. The *Law Weekly*—and I in particular—regret that students were hurt by something we published. At its best, a student newspaper should bring people together, should create and display the elements of our community that bind us.

Prior to publishing the letter at issue, members of the *Law Weekly* editorial board and I consulted with Assistant Dean for Student Affairs Sarah Davies. We understood that the letter would cause members of our community to feel alienated and upset. Dean Davies encouraged us to follow our existing policy: to publish without regard for content or viewpoint. I want to make clear that Dean Davies did not force the *Law Weekly* to publish the letter. The administration neither has nor desires to have any editorial control over the *Law Weekly* or its staff. What Dean Davies offered us was good advice: to follow our longstanding and justifiable po-

Lights, Cameras, Libel!



Photo courtesy of 110th Libel Show

It's Libel season! That's right, March 22, 23, and 24 is the annual Law School musi-

110th Libel Show

cal sketch comedy show where we parody, satirize, and cry about the state of UVa Law and the legal profession. This year's theme features Libel's Angels (a play on *Charlie's Angels*—is it the TV show or the movies? You'll have to come to find out).

What began as a fraternity hazing ritual over one hundred years ago has evolved into a full-length (sometimes even longer) production of acting, singing, dancing, and videos. 1Ls take a break from outlining, 2Ls take a break from clinics, 3Ls take a break being depressed about leaving UVa; come drink at Libel! Come see your friends, colleagues, and section-mates you haven't talked to since the Con Law final make jokes about NGSL and Career Services, while dancing to law-related parodies of pop songs and hit musicals. This year features all levels of talent. From "Wow, I can't believe they can do that!" all the way to "Wow! They're confident without reason!" Enjoy a night of poking fun at all your favorite and least favorite institutions.

"Personally, I am blown away each year from the talent, skills, and energy that the law students bring to their performances," says this year's producer, Jason Boyle '18. "Having participated in the show since I was a 1L, as a cast member, stage manager, and now producer, I am continuously humbled by the sheer

passion I see in my peers" he added. Watch as your fellow law students perform the role of a lifetime, or at least the line of lifetime. "This year's talent is really impressive. We have a lot of experienced people, and some incredibly talented newcomers," said director Jordan Naftalis '18. "Everyone brings a lot of enthusiasm and that's what really makes the show great," she offered. Come see why "not getting involved with Libel earlier" is among the most common regrets of 3Ls.

Libel's true theme that stretches throughout the ages is its length. This year we heard brevity was the soul of wit (who wrote that bullshit? Billy Shakes?) and aimed for *Monty Python and the Holy Grail* instead of *Lord of the Rings*! "Holy Grail is only 90 minutes? It feels so much longer," Director Katerina Siefkas '18, said, foreshadowing most of the students' thoughts about this year's Libel, adding, "But actually, I am really impressed with the creativity of the sketches this year. We're all very excited to share what we've been working on." Most important of all, beer and snacks are provided!

"But wait, there's more!"¹ I almost forgot about the Professor Rebuttal! We spend some of our stage time lampooning the professors, so we have to give them the chance to make fun of us right back! The professors get a chance after intermission, before Act 2 begins, to share some musical parodies of their own. Previous years have featured heavy

hitters like Professor George Cohen, with direction by Professor Molly Shadel. This year, there's even rumored to be a secret video from Professor Kim Ferzan.

For those of you still reading this article, you may be wondering, how long is this article? Or perhaps you're thinking, "How can I, a mere outsider, get involved in the law school's oldest tradition?" Well BOY are you in LUCK. Although the jokes have already been written, the roles cast, and the dances choreographed, we do need volunteers to help with the behind-the-scenes magic, including moving set pieces between sketches and monitoring the keg. If you are interested in getting involved or have any questions, please reach out to Jason Boyle at jmb3ck@virginia.edu. But also, we love an enthusiastic audience and hope you'll take a break from pretending to do your cite check or studying for the MPRE to come laugh at jokes (or stare blankly while silently judging all of your friends; as long as you pay for a ticket, WE DON'T CARE).

Tickets go on sale March 12 in Hunton & Williams Hall. They will be \$15 for drinking tickets and \$10 for non-drinking. If you factor in the lines at Barristers', it's basically an open bar! Buy your tickets while they last, hopefully this year we won't mistakenly oversell seats, but you never know! Libel 110: Libel's Angels runs March 22, 23, and 24. Doors open at 7:00, the show starts at 7:30 in Caplin Auditorium.

¹ Billy from OxyClean.

libelshow110@gmail.com

around north grounds



Thumbs up to the conclusion of the Olympics. ANG is still glorying in Team USA's gold medal in curling. Take that, Canada! Even in your traditional domains of dominance—uselessness and ice sports—America has triumphed!



Thumbs down to dangling prepositions. They are something up with which ANG will not put.



Thumbs sideways to the start of Spring Softball. ANG missed the smell of freshly cut grass but is still recovering from sliding into home face first... during a warm up... for another team. #playhardorgo-home



Thumbs up to Spring Break starting at the end of the week. ANG is excited to go to the Monster Truck rally in Arkansas with Prof. Mitchell. His loyalty rewards card certainly made ANG's dream financially reasonable!



Thumbs down to Feb Club being over. A week ago ANG was "festive" and "collegial," but now ANG is just "dressed in ridiculous outfits" and "drinking alone every night."



Thumbs up to the impending dog show ANG will be judging in Spies Garden after Spring Break. #spreadtherumor #all-thepuppies



Thumbs sideways to Steve Harvey feeling he's finally "off the hook" for Miss America after that Oscars mix-up in 2017. On the one hand, is he though? On the other hand, ANG's hopeful that in six months' time, ANG can finally be off the hook those things ANG did at Bilt last August.



Thumbs up to Libel's theme: "Libel's Angels." ANG is really happy Libel is pursuing such a feminist storyline where women kick butt . . . at the behest of an unidentified man. Whatever, drinking tickets are \$15 so ANG isn't protesting too hard.



Congratulations to the Olympic Athletes from Russia for their gold medal in men's hockey, the country's greatest victory since the 2016 election!

Musings from the Resident Dog-Nut

Do you love dogs? Let's be honest, you do. Do you need extra belly rubs and a couch-

Lt. Jonah Hein USN '19 Guest Columnist



cuddler in your life? Certainly couldn't hurt. Are you unsure if you're ready for a dog, but are willing to spend some time helping both a dog and local animal rescue? Answering "yes" to those questions launched my wife and me into an ongoing adventure as rescue dog foster parents.

While living in South Carolina, my wife, Hannah, and I adopted our dog, Tulip, from a rural dog rescue, which raised our awareness of the enormous abandoned animal problem across the United States. At the time we adopted her, the Charleston, S.C. animal shelter was acquiring up to 50 to 80 dogs a day. These pups were either directly surrendered by their owner or abandoned and taken to the shelter by people who found them in the wild. Unfortunately, in rural shelters, many are euthanized due to the lack of shelter space and inability to find them a suitable home.

Motivated to find a way to help, we started fostering through a rescue organization which pulled dogs from high-kill shelters in the Carolinas and Virginia

and placed them in foster homes. At first, I was extremely hesitant. I never planned on opening up my home to a dog we knew nothing about. We had no idea the issues the dogs might

thing that was initially a minor commitment to evolve into a passion for Hannah and me.

Since coming to Charlottesville, we've fostered dogs from a local rescue (Caring

them. These dogs are placed in foster families while we look for an adoption family that will help them lead a healthy, normal life indoors.

Fostering rescue dogs has been one of the most re-

tion. Basically, it's having a temporary dog; you're able to provide a pup with food, shelter, and love while the rescue advertises and seeks an adoption family. Over the years, we have fostered rescue dogs for as long as three months, and for as short as overnight, in situations where another foster is traveling and needs a dog-sitter, or where the dog may have a veterinary appointment the next morning.

Full disclosure: fostering is not all sloppy kisses and snoozing. Many of these pups have lived rough lives outdoors and have never experienced people, the inside of a home, smooth floors, food bowls, or walks. But the good news is that most of these hurdles are overcome with two simple measures: kindness and patience. After a few days, almost every foster dog we have hosted is over the moon to have a soft bed and regular meals!

I'll admit, the toughest challenge of fostering is parting with your foster pup once an adoption family comes along. Over the years, we've grown particularly attached to many of our fosters; however, the satisfaction we receive from seeing the joy that they bring their new families overwhelms any sense of sadness as they leave our house. Hannah calls this our "happy-sappy"



From right to left: Tulip Hein, Hannah Hein, and Rosie Hein. Photo courtesy of Jonah Hein.

have or their medical situation. As "foster parents," we cared for the pups while the rescue organization advertised for "forever" families on Petfinder and other sites. Though most of our fosters have been hounds, we also had the pleasure of a super-snuggly boxer who loved squeaky toys, an elderly pit-bull who was a sucker for belly rubs, and a few attention-demanding beagles. It didn't take long for some-

for Creatures) and volunteered for a local nonprofit that provides dog houses, food, and medical care to dogs that live their entire lives outdoors on the end of a chain (Houses of Wood and Straw, or HOWS). My wife serves as the Forever-Home Coordinator for HOWS and works around the clock (on top of a full-time job!) to find homes for outdoor dogs, provided the owner can be convinced to surrender

warding experiences we have ever had. Being able to "turn around" a neglected dog and deliver them to a caring family has brought us tons of great memories and plenty of stories to share with the world. At the end of the day, fostering is a way to make our corner of the world a little better.

Are you interested in joining us? Fostering is a flexible activity and can be either short or long in dura-

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Mingalabar Myanmar!

It was during one of those very hot days in August in Charlottesville when we first

María C. Dieuzeide LLM Guest Columnist



heard that we were among the eight students who had been accepted to the Human Rights Study Project of the University of Virginia School of Law. One

Jordan R. Silversmith '18 Guest Columnist



email and the word "Myanmar" were sufficient to feel happy, if not also a bit of trepidation, and to start dreaming of and organizing what would turn out being one of the most amazing experiences of our lives.

Getting ready for the trip was no easy task. Vaccinations, malaria pills, visas, forms and more forms, almost twenty-seven hours in transit, layovers in basements with ominous signs that read "THE EXIT OF FLIGHT CANCELLATIONS," many coffees (with milk!), and watching four movies on the plane were part of the preparations. Nor does that include the strange eleven-and-a-half-hour time difference that made the beginning of the trip full of sleepless nights, groggy afternoons, and a strange enduring hunger for Five Guys.

But everything was worth it. After we arrived in Yangon, we discovered that finding good food would not be a problem in

a city with curries and noodles from the many different ethnic groups of Myanmar, along with exquisite teas. We also found out that this place has a special mysticism. It may sound a cliché to say that "life moves at a different pace here," but that doesn't make it any less true. Once you get used to the traf-

fic (something similar to Hanoi with its thousand motorbikes, or Manhattan with only ten percent of its traffic lights, which makes that a two-and-a-half mile trip can take forty-five minutes) and to speaking a mix of English with a small quota

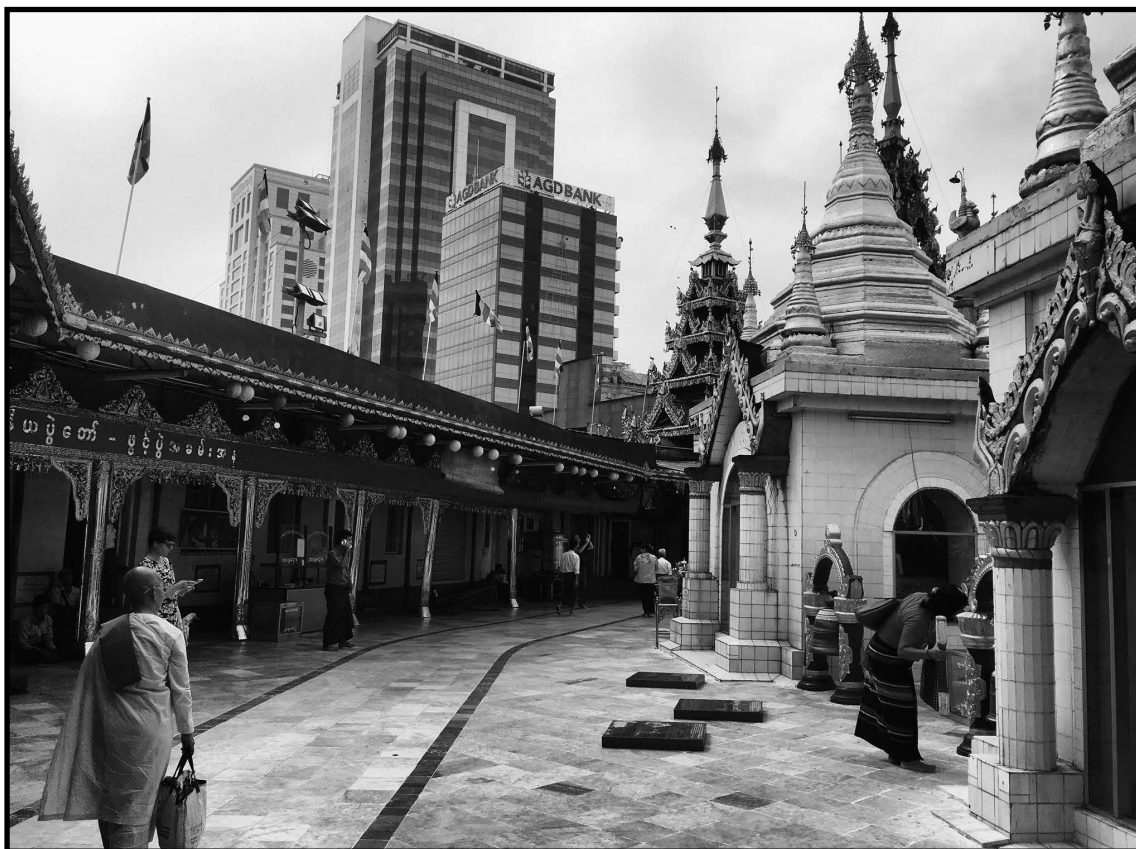
of Burmese words and a great amount of body language and imagination, you start to understand some of the elements that make Yangon a distinctive place.

Indeed, the stark contrast between dilapidated British colonial buildings, the immense Shwedagon Pagoda and other

seem to appear out of nowhere, with hundreds of shops that offer a fascinating insight into the ethnic diversity of the city, the interaction of different cultures, their history, their traditions, their art and their patrimonies that vary from clothing, jewelry and handcrafts to vegetables, thanaka, and different sorts of

The picturesque organization of Yangon and its peculiarity cannot be completely understood without trying to describe the Burmese people. They are intense fans of international soccer and of the Myanmar National League, dress in longyis that vary in colors according to age, gender, and ethnic group, and cover their faces with swirls of thanaka to protect themselves from the bright sun. But what most surprised us were their broad smiles, their kindness and their generosity. No matter whether they are hanging out at 19th Street (the most popular night spot for locals), listening to music or playing the guitar next to Kandawgyi Lake, commuting back home by the Circle Train or studying at University of Dagon, local people always smile to visitors, are fascinated by learning from other cultures and do their best to make everyone feel at home. This scene is complemented by the presence of little novice monks everywhere with their pink robes, flooding the marketplace and streets with magic and charm.

Myanmar, like every country, contains contradictions and multitudes. Yet, what is distinct about Myanmar is how the country's paradoxes are apparent, with such clarity, every moment of every day. A country of astounding ethnic diversity, Myanmar is home to at least 135 recognized ethnic groups. Its government has treated one ethnic group as its defining ethnic identity; it has a dominant



A monk walks by a Buddhist temple in Myanmar. Photo courtesy of María C. Dieuzeide.

meats. All this is surrounded by miles of railways and the Yangon Circle Line Train that several times a day circles around the city through the rural outskirts and gives you the chance to interact with local people and get a sense of their daily routines.

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sition toward controversial content, even when doing so makes us uncomfortable.

Despite the understandable offense caused by letters like last week's, the *Law Weekly* remains committed to publishing the viewpoints of the Law School's residents, contentious as they may be, so long as they do not amount to individual personal disparagement, defamation, threats, or harassment. The reasons for this are several. First, the *Law Weekly* is publicly funded; we receive substantial student dollars from Main Grounds that help alleviate our publishing costs. We're no First Amendment experts, but we think that, having held ourselves out as a neutral forum that does not discriminate on the basis of content or viewpoint, we may place ourselves in legal jeopardy if we decide not to publish a letter on the basis of one of those categories.

But even if the law does not compel us to maintain neutrality, we think our principles as a student-funded newspaper do. This paper's editors firmly believe that the answer to ill-informed, outrageous, and even offensive speech is not silence or censorship—it's more speech. We hold to what Justice Kennedy wrote in *United States v. Alvarez*,¹ that "[t]he remedy for speech that is false is speech that is true The response to the unreasoned is the rational; to the uninformed, the enlightened; to the straight-out lie, the simple

truth." This week's edition contains a multitude of responses to last week's letter. Most of them denounce the piece: "[w]rong," "racist," "nativist xenophobia," and "supremely deficient" are among the labels applied to it. Rather than letting a noxious viewpoint fester in the unspoken underbelly of our community, our policy of neutrality allows such viewpoints to be aired—and then thoroughly repudiated by the thoughtful students who make up our student body.

Unfortunately, some members of our community responded to last week's controversial letter by removing the remaining copies of the *Law Weekly* from its most visible newsstand, outside the library. Some of the copies were tagged with writing and posted throughout the Law School, including on the *Law Weekly*'s office bulletin board. We understand that the letter upset some of our readers. But our writers and editors work hard every week to produce a newspaper for students to read. Students and faculty from across our community contribute their thoughts, and a few volunteer editors work to ensure publication. Removing the papers devalues their work and attacks the very purpose of the newspaper: to propagate ideas and allow them to be debated and attacked, if necessary. We hope that in the future, our readers will leave the papers in the stands and allow their colleagues to make their own decisions about any pieces the paper contains.

We recognize that the burdens of free speech fall most heavily on those who have already faced the greatest societal bur-

dens. As Dean Leslie Kendrick wrote for CNN last summer after the KKK rally in Charlottesville, "[The costs of free speech] fall disproportionately on African-American, Jewish, Muslim, and other minority members of the community. They are the ones who absorb these very public, very ugly assertions that they are worth less than other Americans."² By requiring authors of letters to include their names, photos, and contact information, we hope to alleviate that burden as best we can. In the *Law Weekly*, authors must stand behind their writing and the rightful criticism that follows; they cannot hide behind shields of anonymity. We remain committed to maintaining our status as a neutral forum in which members of the Law School community may stand up to ideas and opinions they disagree with.

As the *Virginia Law Weekly* approaches its 70th anniversary, we strive to provide the Law School with important stories about its community members; with interesting and funny insights into the lives of law students, faculty members, and staff; and with a place for opinions to be aired and debated. We hope our readers will continue to challenge us when they think we mess up, and tell us so in writing. Response letters to any article or letter may be sent to editor@law-weekly.org, or to my own email address: jmv5af@virginia.edu.

² <https://www.cnn.com/2017/07/12/opinions/free-speech-isnt-free-kendrick-opinion/index.html>

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religion, Theravada Buddhism, that is profoundly conservative yet whose votaries—the monks

the country "Burma" or "Myanmar" is a subject of contention, Roman transcriptions of those two names hide the fact that both "Burma" and "Myanmar" are pronounced almost identi-



Judge Keven Newsome. Photo courtesy of Alabama Today.

and nuns one may see in their flowing saffron robes at all hours and in all places—have no qualms about using their iPhones to take selfies in front of the skyline-defining Shwedagon Pagoda; a citizenry that, having endured in isolation more than half a century of the vicious whims and barbarism of a military junta, nevertheless manifests a profound curiosity about the world and such endearing kindness towards strangers, the homeless, foreigners, tourists and visitors; and, of course, a country whose name could be Myanmar, or Burma, or neither, or both, or something different altogether. While, the convention of whether to call

cally in Burmese; what's more, people there call themselves "Myanmar people," so it seems wise to let a country's population determine who they are. For a novice traveler, Myanmar can seem like a lot, even too much. But if you spend several weeks there, as we did with the Human Rights Study Project over winter break, you come to a new realization: there's a reason every person greets you with a smile and says mingalabar. The word means "it's a blessing," or "we are blessed." And that's what it's like to be in Myanmar: a blessing.

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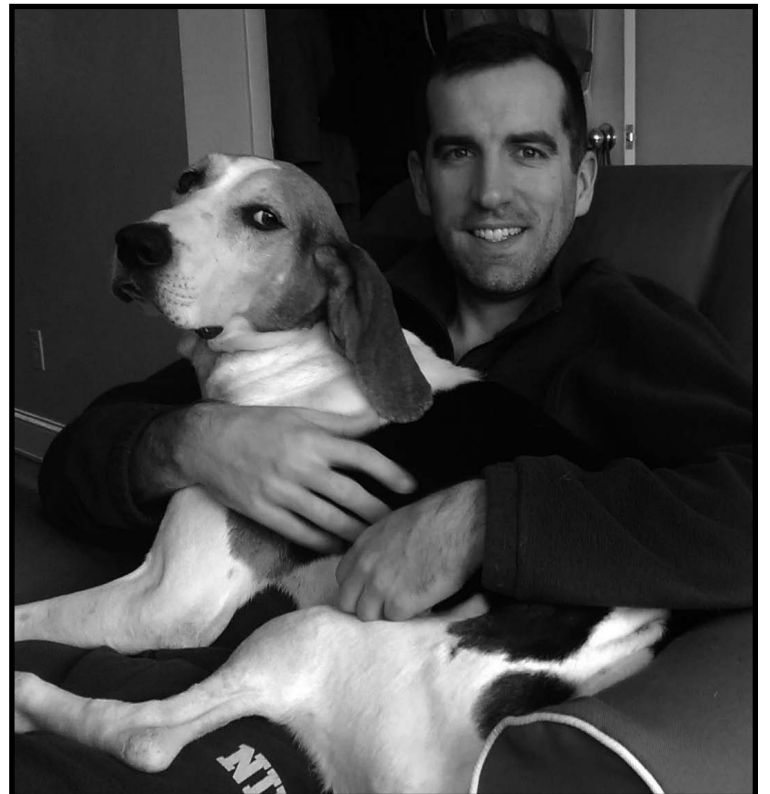
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days. Most of these dogs have so much love to share, we can't possibly keep it all to ourselves.

I have to admit that there are few things as pure as the unadulterated, butt-wagging joy that I receive at home after a long day of studying. Some of my section-mates have joined the fostering bandwagon and can attest to its benefits as well (looking at you, Sierra and Hutton). Given the continuous stream of rescue dogs through our home, we've taken to calling it the "Hein Hound Hotel,"

and some nights, it feels like we're booked to capacity. Right before Christmas this year, we had six dogs in our house! If fostering is something you'd like to try, let us know: we'd love to open new locations for the Hein Hound Hotel! If you'd like to learn more, we even have a website (www.HeinHoundHotel.com) where you can review our distinguished former guests, learn about local laws we are trying to change, and apply to foster.

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Author Jonah Hein and Rosie. Photo courtesy of Jonah Hein.

HOT BENCH



Brian Miller '19

1. What are you most excited for during your second summer in Raleigh, North Carolina?

North Carolina is God's country —surrounded by the best barbecue, kind people, and a day trip to the Outer Banks or the mountains.

2. Where did you grow up?

Asheville, N.C. It's a small speck of new-age art and craft beer sitting in a sea of Appalachian country folk. One of the best places to go to find jacked-up pickup trucks sporting "Eat Local" bumper stickers.

3. If you could live anywhere, where would it be?

Denver seems nice. But I'd be fine with anywhere that has a Moe's Southwest Grill (the real reason I'm not staying in Charlottesville post-law school).

4. What's your least favorite sound?

I'd agree with Jenny Lamberth that the sound of chewing food is up there. Also any portion of the Bluebook being read aloud.

5. If you could meet one celebrity, who would it be and why?

Lil Wayne. Explanation neither needed nor provided.

6. Where is your favorite place to vacation?

St. Simon's Island, Georgia. Just enough tourists that there's a lot to do, but a far cry from the commerciality of somewhere like Myrtle Beach. They also have very nice trees.

7. What's something you wish you'd known about law school before coming to UVa Law?

The name of literally any major law firm. I spent many conversations pretending to know what was happening when people were throwing around strange words like "Cravath," "Skadden," and "MoFo."

8. What did you have for breakfast this morning?

Bojangles. One of North Carolina's gifts to the world, along with Cookout and Nina Simone.

9. What's the best gift you've ever received?

Maybe when I got my PlayStation 1. At the time I had no idea what a "PlayStation" was, so you can imagine my 7-year-old self's pleasure when I discovered it was not in fact some sort of children's playpen.

10. Backstreet Boys or *NSYNC?

I used to think Backstreet Boys was a gang, so I guess *NSYNC.

11. What is the best concert you have ever been to?

I enjoyed John Mayer when he was playing his more blues-y stuff.

12. What's your spirit animal?

A fox, provided it's an unusually un-enthusiastic fox.

13. What's your favorite food?

CHICK-FIL-A NUGGET.

14. If you won the lottery, what would you do with it?

BUY CHICK-FIL-A NUGGET. And then see if I could bribe Hugh Jackman to come to Barrister's with me next year. (Alternative answer: àchurchàloansàcarànugets).

15. If you had Matrix-like learning, what would you learn?

Piano, and then how to precisely mimic Prof. Jeffries's voice.

16. What are the 7 wonders of the law school?

The wild success of Career Services; Dean Emerson Spies's furry robe thing in his portrait; the ghostly doors to the outside that make noises at you when you walk by them at night (seriously, it's a thing).

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¹ 567 U.S. 709 (2012)

Letters to the Editor: Responses to Last Week

Last week, the Virginia Law Weekly ran a letter to the editor from Max Wagner '19 entitled "Untangling the Immigration Debate." The Law Weekly publishes letters without regard to content or viewpoint. The paper does not endorse the positions taken by authors of letters to the editor. Below are the responses the Law Weekly received to Mr. Wagner's letter. As was the case with Mr. Wagner's letter, the only changes our editors made relate to grammar, style, and clarity.

Last week, guest columnist Max Wagner threatened our fair school with not one, Kevin Jackson '20



not two, but an entire series of opinion pieces on immigration.¹ Mr. Wagner's first piece objects to liberal terminology and suggests that we adopt a more Trumpian tone. I'm not an expert on immigration. However, I am in the process of getting a visa for my spouse, and I have lived abroad most of my life. I helped with the Migrant Farmworker Project and will soon begin immigration internships. Admittedly, I'm only a few weeks into Immigration Law classes. But since last week's piece set the bar for discussion very low, I'm happy to proceed on these few credentials.

Mr. Wagner is right that words matter, especially the ones we use to sort human beings. He loosely frames his article around the terms "undocumented immigrant," "DREAMer," and "chain(ed) migration." He argues that we should call people "illegal" instead of "undocumented" immigrants. "Undocumented," he says, is meant to sound more sympathetic and distort the debate. "Illegal," to him, is more factual.

1 Max Wagner. "Guest Opinion: Untangling the Immigration Debate." <https://www.lawweekly.org/col/2018/2/21/guest-opinion-untangling-the-immigration-debate>

In terms of accuracy, neither holds up well. "Immigrant" itself may be confusing because, under federal law, it denotes a category of people intending to stay permanently. It does not include everyone who crosses the border unlawfully. "Undocumented" is arguably under-inclusive. Some people do have documents but then overstay. "Illegal" is also potentially misleading. Crossing the border without authorization is not in itself a federal crime as Mr. Wagner seems to believe. If it were, there would need to be due process instead of summary deportation. Of course it isn't the legal route, and the government can deport you for being unlawfully present. Is this splitting hairs? Yes, but we're in law school. We all use these terms loosely in daily conversation and writing, and that's fine. But the more precise terms are "unauthorized/unlawful alien/noncitizen." If accuracy alone is your goal, pick an adjective and a noun from that set and you're golden.²

I personally prefer "undocumented immigrant." Yes, that's a partisan choice. It implies that the problem is the system, not the immigrant. It tells you where I stand in this debate. A strong preference for "illegal immigrant" is also telling. Illegal activity is done by criminals. Criminals are bad people who should be punished. At least, those are the normal, non-lawyer connotations of those words. "Undocumented" and "illegal" are both understandable but imprecise. Neither is neutral. Mr. Wagner has not chosen an accurate term; he has merely chosen the one that facilitates President Trump's agenda.

He does not object to the term "DREAMer" itself. He simply wishes to say that Dreamers are not as successful, not as fluent in English, and not as literate as their advocates would have us believe.

2 I'm drawing from Professor Kevin Cope's January 23 Immigration Law course lecture. The analysis of immigration terminology is my characterization of that content, and the application to last week's article is my own.

His source? An opinion piece by a senior legal fellow at the Heritage Foundation.³ That piece, in turn, gets its statistics from the Center for Immigration Studies. We don't have time to go into all the problems with CIS. Its executive director wrote a book called *The New Case Against Immigration: Both Legal and Illegal*.⁴ We can just leave it at that.

Advocates of any cause will find the most sympathetic cases and highlight them. And of course not every Dreamer fits the poster child description. But that's not really the point. We support Dreamers because it's wrong to deport people who are part of our communities, who are harming no one, and who have been building their lives alongside us. English fluency, lack of exposure to their birth countries, and military membership are rhetorically helpful but ultimately irrelevant. Dreamers are Americans too, and the law should reflect that.

If Trump's immigration plan is "extremely generous" to Dreamers, I don't know why Mr. Wagner feels the need to make them seem less sympathetic. He's right that we should "be honest about the experiences of members of this group." The best way to do that is to listen to Dreamers themselves. We should read and hear their experiences before we draw conclusions. I dare say we'll need more than just CIS statistics filtered through an anti-immigrant opinion piece.

Finally, Mr. Wagner claims that "chain migration" is neutral and descriptive. He disproves of "chained migration," a reference to slavery that implies "chain migration" is a racist term. Strikingly, he neglects to discuss the far more widespread "family reunification." "Family reunification" is

3 Hans Spakovsky. "Not-so-beautiful Dreamers: The reality behind the media airbrushing." <https://www.washingtontimes.com/news/2017/dec/25/daca-demographics-show-less-ideal-dreamers-media-i/>.

4 <https://www.cis.org/Krikorian?type=blog>

perfectly descriptive, since that is what bringing family members to the U.S. does. It is used in U.S. legislation and regulations.⁵ "Chain migration" may not have always been derogatory.⁶ However, it is only familiar to most of us because President Trump uses it in his anti-immigrant rhetoric. Presumably it's easier to rail against "chain migration" than it is to openly attack families.

Last week's article is not the impartial guide it purports to be. It characterizes Trump's immigration plan as "extremely generous." It puts "clean DACA bill" in scare quotes. Throughout, it makes negative references to "the left," "the far left," and "advocates." The closest it gets to balance is a vague reference to "hardliners on both sides." It purports to guide us through partisan terms, but it's not hard to see the charade for what it is. So rather than "untangling" it, let's just cut through the knot of terminology and make our positions clear. I, like many others at our school, stand with the undocumented. Others stand with Trump. Still more stand somewhere in between. It's a high-stakes debate, but there's no need to be coy. Since we must be partisan, let's at least be straightforwardly partisan.

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5 22 USC §7832(b)(2)(B); 8 CFR §204.11(a); 8 USC §1227(a)(1)(E)(ii); 45 CFR §400.115(c)

6 Blair Guild. "What is 'chain migration'?" <https://www.cbsnews.com/news/what-is-chain-migration-definition-visa-trump-administration-family-reunification/>

Last week saw one of the most shameful displays of ignorance and intellectual cowardice that

W. Augustus "Gus" Todd '19



I have witnessed since coming to UVA for law school. As many of you may have noticed, last week's issue of the *Law Weekly* disappeared from the stands Thursday night. It appears that members of our community, after reading an article they disagreed with,¹ removed the remaining copies of the paper off of the stands to prevent others from reading the article. While reasonable people can and should continue to discuss the merits and flaws of the article itself, this reaction to the article must be forcefully condemned. Rather than confronting the ideas they disagreed with, the people who participated in removing the papers attempted to silence the person holding them. Our society should not tolerate this conduct anywhere. It is hostile to the very concept of the freedom of speech and it is abhorrent in an institution of higher learning where academic honesty and intellectual freedom are paramount virtues.

However, the problems with the events of last week run deeper and speak to the very core of

1 The article attempted to clarify terms commonly used in the debate over immigration and referenced statistics that allegedly show many "DREAMers" lack literacy skills and fluency in English. I have read the article, but do not know enough about the ongoing immigration debate to have a well-informed opinion about the topic or the issues raised by the article.

RESPONSES page 5

Faculty Quotes

J. Harrison: "The concept of wrongful death invites the concept of rightful death, but I'll say no more."


K. Kordana: "You should join my evil cabal. Anyone else have an evil plot?"

C. Nelson: "I will now make the mistake of fully analyzing that joke, stripping it all of all its humor."

M. Gilbert: Lots of things that are totally irrelevant to a person's ability to govern affect the outcomes of elections. For example, when was the last time you saw a woman president?

A. Bamzai: "I wanted to join the Association of Irrigated Residents this morning when the City of Charlottesville shut off my water."

Heard a good professor quote?
Email editor@lawweekly.org!



Virginia Law Weekly

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RESPONSES

continued from page 4

who we are as students at UVa and as future leaders in our communities. Here at UVa, we pride ourselves on our support for one another. We pride ourselves on treating each other with dignity and respect and we hold ourselves to a higher standard in our interactions with one another. The foundation of trust that underlies this school is a large factor in why UVa has come to be consistently ranked as not only one of the best law schools, but also one of the best places to go to law school.² The events of last week undermine that trust. Silencing a fellow student is not respectful and is emblematic of a much larger problem facing our society.

It should be uncontroversial to recognize that right now we are a divided nation. America is facing serious issues that in the coming years we are going to have to confront. At home, we still have yet to come to terms on how we are going to treat healthcare and we are in the midst of a debate about whether the individual right to bear arms has continuing relevance in a modern world. Issues concerning race, sex, drugs, abortion, and religion are all still very much part of our national dialogue. On the foreign policy front, we are embroiled in a conflict with one dictator who gasses his own people and may soon be at war with another one hell-bent on launching ballistic missiles at our homeland. It should surprise no one that it appears a Cold War foe is seeking to exploit our current division for its own geopolitical benefit.

If we are going to solve these issues as a nation, we are going to have to do it together. Are we going to initially agree on the best path forward? Of course not. It would be a bad thing if we did. Instead, we will forge our path by arguing with one another—the crucible of vigorous public debate will yield the right answers once we are ready for them. But this kind of robust debate cannot happen if we are not willing to treat each other with respect. The further we divide, the less likely it is for us to engage with the other side and the easier it is to demonize those with whom we disagree. Our inflamed rhetoric portrays each other as evil and lacking humanity while at the same time we retreat into echo chambers that reinforce a sense of our own virtue and righteousness. This is a dangerous cycle, but it is one that we are capable of breaking.

As soon-to-be lawyers, we are entering a profession where we must learn how to disagree without being disagreeable. Whenever our careers take us, we will be in a position where resolving conflict will be part of our everyday lives. Building strong working relationships with those on the other side of the table is a skill that will be crucial to our long-term successes. These relationships will not be fruitful unless we can interact with one another with respect and honesty.

But more than that, as graduates of an elite law school, we will be in a position to lead the debate on the issues that continue to divide America. Every person at this Law School is intelligent and has ideas worth

taking seriously—we wouldn't be here otherwise. After we graduate, people will look to us for guidance on how to think about these issues and our voices will set the tone for these ongoing debates. We must keep our role as future leaders of our communities in mind when we talk to one another and treat the ideas advanced by our colleagues with due respect, especially when we vehemently disagree with them.

Where we do disagree, we must use the means available to us to respond in a constructive manner that seeks to move the debate forward. Write a response article. Try to get organizations to arrange a debate. More than anything, seek out those with whom you disagree to learn from their perspective. In the process you will recognize their humanity and we will all be better for it. There is some irony in the fact that the article that initiated this uproar was itself the first step in starting a discussion over the words we use when we debate immigration policies. It saddens me to see members of this community having such an antagonistic reaction to an opposing viewpoint. Although the individuals involved do not represent the broader UVa law community, their actions represent a breach of trust that we must take seriously. That is not how elite law students carry themselves, and it is not something we should want to be associated with. Because if this is happening here, I shudder to think what it means for the rest of the country. We can do better than this. We must.

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Last week, Max Wagner wrote an article titled, "Guest Opinion: Untangling the Immigration Debate." In this piece, Wagner explains his position on why many undocumented immigrants should be called illegal immigrants, while providing his divine benevolence over the status and categorization of DREAMers. Wagner states:

While the DREAMers are illegal immigrants, there has long been an understanding that there is a distinction between those who willfully violated the American immigration laws and those who were brought over as children. This is a distinction I agree with. DREAMers did not choose to come here, in most circumstances. They were brought here through little or no fault of their own, and it makes sense that a separate solution for them should be discussed.

He demands that the public be truly "honest" about the experiences of DREAMers in order to inform the U.S. government's immigration restrictions. Wagner then, in all his precious sympathy and benevolence over DREAMers, cites that DREAMers *en masse* have high illiteracy rates, lack fluency in English, and lack high school diplomas. The study Wagner cites fails to list any sources or methodology in support of its statistics. This study was briefly described in a *Washington Times* article, which only quotes but does not

cite the source. In fact, the study was allegedly conducted by the Center on Immigration Studies, which is listed by the Southern Poverty Law Center as a group with ties to white supremacist organizations and whose employed policy analyst was pushed out of the Heritage Foundation for forwarding racist pseudoscience.

Based on what Wagner himself spells out in "Untangling the Immigration Debate," the U.S. government should "define who [DREAMers] are" through DREAMers' allegedly (but unfounded) high illiteracy rates and low levels of English fluency and high school diplomas, so that the government "can make correct decisions" regarding immigration policy. It is not a foregone conclusion to see that if Wagner had his way, the U.S. government wouldn't support DREAMers because, in Wagner's eyes, they bring nothing of value to the United States.

It should be very easy to dispute Wagner's claims about DREAMers and other undocumented immigrants. It should be common sense for this Law School community to know the value that DREAMers and other undocumented immigrants bring to the United States; we should also not be forced to engage in respectability politics to appeal to this Law School community about the value of DREAMers and undocumented immigrants to society.

It should also be common sense that the United States of America was created from immigration from Europe. But those immigrants, unlike the DREAMers and other undocumented immigrants Wagner and so many others malign, violently colonized this land from Native Americans, and ripped numerous of Africans away from their homeland by forcing them into slavery and forcing them to build the nation we now know as the United States of America. Wagner, unsurprisingly, makes no mention of those immigrants. Wagner also fails to mention the U.S.'s role in destabilizing numerous nations with its interventionist policies, and that destabilization causes many to emigrate to the U.S. seeking stability and prosperity. He instead dismisses the worth of DREAMers and other undocumented immigrants. For DREAMers and other undocumented immigrants, their sole crime is to seek a better life in a nation in denial of its own sins. Wagner's piece is the embodiment of America's denial.

The fact that students are forced to write a response to blatant racism featured within an article from an institution where the best legal scholars and attorneys supposedly are present is ridiculous. This is not the most desired use of mine or anyone's time. Consistently students at the University of Virginia School of Law are forced to dedicate time to combat emotionally and mentally triggering instances of racism, xenophobia, homophobia, islamophobia, etc. forwarded by students. The time taken to combat such issues is spent away from doing weekly readings for courses, outlining and preparing for final exams, going to office hours for professors, and this ultimately affects our academic performance at UVa Law. The fact that marginalized students have to respond to an article

forwarding racist and xenophobic ideologies further indulges, legitimizes, and publicizes such farces of views in the first place. But here we are, and unfortunately based on this institution and the reactions from members of our community, this is the only "acceptable" way to respond to such ignorant, dangerous, violent, and triggering rhetoric.

I implore the *Law Weekly* not to continue Wagner's series about immigration. It is patently obvious that he is misinformed about U.S. immigration policy on a sociohistorical level. The sources he cites prove to be unfounded conjecture. Neither I nor anyone else should have to write this for an article like Wagner's to be maligned and condemned. But as tradition goes at UVa Law, the burden continuously falls on the marginalized to fight against our own marginalization. And it is utterly exhausting.

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she/her/hers

Last week, this paper published a guest opinion that stirred controversy on grounds

J. Web Leslie '19



and led to an unidentified person removing all the copies from the library newsstand. I would have been completely oblivious to this drama were it not for the *Law Weekly's* Facebook post that blew up my news feed. The post (and re-posts) made no mention of the article's content. So naturally I had to track down a copy and settle in for a challenging read, which I figured I would probably disagree with on the merits. That is not exactly what happened for me. In the words of someone who shared the *Law Weekly's* post about the theft, "fight content you disagree with using better content." I agree, and so this is my attempt.

I'll grant the article's take on words like "illegal" vs. "undocumented" or "chain" vs. "chained." What ideology doesn't just hate it when the other side comes up with an effective word or phrase to carry their message? What "pro-life" proponent wouldn't love to cement "pro-ending-life" into the lexicon? Discussions about linguistic accuracy are worth having—for better or worse, the legal term is "alien"—but I'm not writing this to have that debate. I want to write about a different kind of chain—a chain that is, in my opinion, far more harmful to the country than so-called "chain migration." That is the chain of sourcing that normalizes baseless and/or utterly false information, which then ends up in our news feeds, accumulating attention, acceptance, and legitimacy.

To its credit, the article recognized that DREAMers are not inherently bad people. They are often children brought to this country at a young age "through little or no fault of their own"—because what small child isn't occasionally a little at fault for their parents fleeing to another country? I'm sure my parents considered it. Putting aside that "a majority of the DREAMers were brought over as teenagers" is a notion that was left unsupported in the article and is at

least disputed,¹ my interest was really piqued over a "study" the article cited regarding literacy rates of DREAMers. Digging into the source of this study, I found a sadly common example of legitimization of poor sources through a process whose name I will make up—chain citation.

This citation begins with an article from the *Washington Times*, a notoriously conservative paper whose viewpoint I do not identify with. However, that does not spell trouble—let's go to the next link in the chain. The article cites the Center for Immigration Studies (CIS). I'm not an immigration expert; it sounds reputable enough. Let's check it out. Search results show that CIS was listed as a hate group in 2016 by the Southern Poverty Law Center (SPLC) for "its repeated circulation of white nationalist and anti-Semitic writers in its weekly newsletter and the commissioning of a policy analyst who had previously been pushed out of the conservative Heritage Foundation for his embrace of racist pseudoscience."² Not looking good so far. But I hear you, 50-percent of readers: "SPLC is a liberal-leaning organization that has its own agenda. What about the study itself?" Let's hit the next link in the chain. Using the direct quotes from the *Washington Times* article turned up one article on CIS's website, "Time to End DACA."³ Still, this article is not the source of the data. Fortunately, the article directly links to the study.⁴ The study's author? Remember the policy analyst pushed out of the Heritage Foundation for his racist pseudoscience? Bingo. The study's author's name is Dr. Jason Richwine, a Harvard Ph.D. whose dissertation was entitled "IQ and Immigration Policy", which argued that genetic and/or environmental factors have made "today's immigrants . . . not as intelligent on average as white natives" in a way that will "have substantial negative effects on the economy and on American society."⁵ I hope by now you're convinced that the literacy data from last week's article is insufficiently supported. But in case you're willing to accept this data because all I've done is attack the source *ad hominem*, let's walk this study back to the article. Even if you are willing to accept the validity of Dr. Richwine's immigrant literacy study, it wholly doesn't support the premise for which it was cited. The study purports to quantify literacy rates of Hispanic immigrants *as a whole*. The CIS article that cited the study linked its Hispanic literacy rates (without questioning accuracy) to DACA recipients

1 https://cdn.american-progress.org/content/uploads/2017/11/02125251/2017_DACA_study_economic_report_updated.pdf (noting that average age when first arrived to the United States was 6.5).

2 <https://www.splcenter.org/fighting-hate/extremist-files/group/center-immigration-studies>.

3 <https://cis.org/Oped/Time-End-DACA>.

4 <https://cis.org/Immigrant-Literacy-Self-Assessment-vs-Reality#13>.

5 <https://www.scribd.com/doc/140239668/IQ-and-Immigration-Policy-Jason-Richwine>.

2 No citation needed.

RESPONSE

continued from page 5

merely because “80–90 percent” are Hispanic.⁶ Therefore, that author’s “estimate” was that “perhaps 24 percent of the DACA-eligible population fall into the functionally illiterate category and another 46 percent have only ‘basic’ English ability.”⁷ The author doesn’t control for variables or provide any evidence that DACA recipients are somehow representative of Hispanic immigrants writ-large.⁸ This is how a study, which wouldn’t be relevant even if accurate, makes its way from the mind of a racist, through the conduit of a hate group, into a slanted newspaper, and onto the pages of the student newspaper of one of the best law schools in the country. Chain citation—people have a right to be mad about it.

It should be obvious from my taking the time to write this that I support a pathway to citizenship for DREAMers, unqualified and unsullied by political maneuvering. Further, I take serious issue with the unspoken, rhetorical conclusion of last week’s article, which is that DREAMers somehow do not *deserve* legal status because they are illiterate, or nearly so, and they have no high school diploma. It’s a dog whistle, plain and simple. It is fundamentally no different from the nativist xenophobia that was

typified by anti-Roman-Catholic and anti-Asian movements in the 19th and 20th Centuries. Replace “DREAMers” with “Asian” in last week’s article and you’ll see what I mean. Articles like these are problematic not only for their improper research, but also because they continue to marginalize people who would undoubtedly be more successful in our country if we opened our arms rather than stereotyping and ostracizing.

I’m not saying you have to agree with my point of view on DREAMers. What I do hope you agree with is that we in the law school community should attempt to rise above the inadequacy of modern discourse. Neither “side” is innocent of flippant sourcing that feeds our arguments and our egos, myself included. But we should at least attempt to raise the bar, where we can, and refuse to add noise to the debate. Thoughtful and considerate research and argument is paramount, not just in our future careers, but also in our every-day interactions with each other.

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Can we all please stop the yelling? We get it. The far right are xenophobic, gun-toting racists

Nathan Tyre '19



who are looking to protect white America at the expense of, well, everyone. And the self-righteous left, correct as they may be on

many issues, believe that government cures all ails and if you get in their way they will smear you with names like racist, sexist, xenophobe, and/or bigot. While there may be more than a few on the right that deserve such a description, it is not all of them. And while some on the left want to burn the constitution and start over, most do not.

My primary issue with Mr. Wagner’s recent article is not with his opinion. He’s entitled to be wrong. My primary issue is that it wasn’t worthy of a UVa Law student. This is a school, so we don’t have to get too serious, but Mr. Wagner’s article added nothing to the debate on immigration. It was a poorly written, poorly sourced echo-piece. The article served only to add a microphone to the political right’s talking points.

The provocateurs who responded to the article by throwing away copies of the *Virginia Law Weekly* and penning an unsigned response also did nothing to advance the debate. Mr. Wagner’s article was inflammatory. It contained arguments that I would call racist—for instance, the argument that those who break immigration laws are “illegals” but those who break other laws are not so branded. But the arguments that Mr. Wagner offered were not his own. He simply repeated them. We’ve heard them before. And

we’ve heard the response before as well: He’s a xenophobe. Like I said, we get it. Can we turn the page?

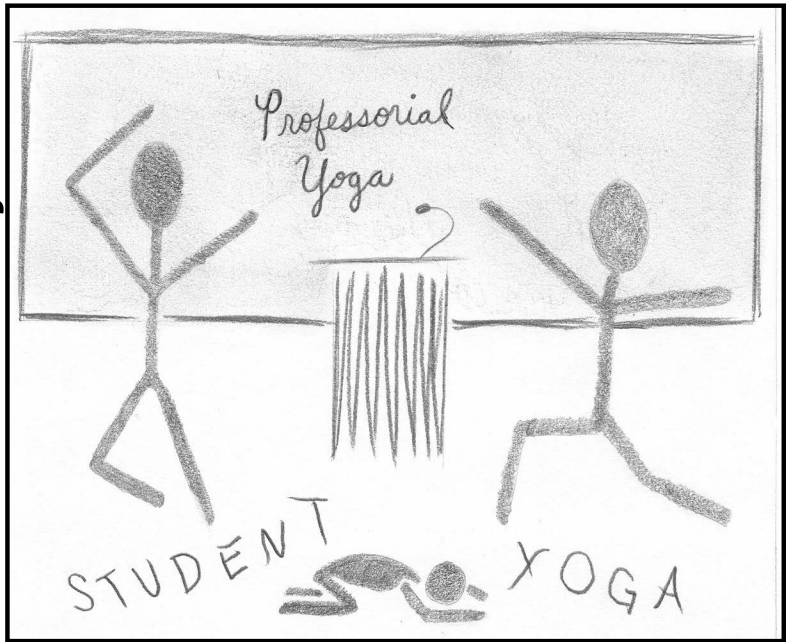
Our country, and certainly this law school, should be a place where ideas and policies are debated with open minds. But instead we walk the halls and hear echoes of ideas we already *know* to be true. There is no room for debate when minds are made up and battle lines drawn. If you know you are right, then have the confidence to read Mr. Wagner’s article and respond to it with truth and reason. If you are confident in what you believe, have the humility to read Mr. Wagner’s article, look past its inflammatory comments, and reason with the issues. And if you are going to engage in the debate, be disciplined enough to come up with original thought and to properly source your articles. Finally, the debate should be respectful of these conditions and

of people. Mr. Wagner’s article wasn’t respectful. It wasn’t original; it wasn’t properly sourced; it wasn’t offered with humility; it didn’t respectfully consider the other side; and it ignored the human element. We should set the standard a bit higher.

To his credit, Mr. Wagner signed his name to his response. His article may have been supremely deficient, to put it mildly. But he engaged. I hope he continues to submit articles to *Law Weekly*. But I hope he does so in a thoughtful and disciplined manner. I hope his writing improves with each attempt (I hope the same for my own writing). I hope that his future articles are respectful of others and of the debate itself. And I hope that those responding to his article will in turn put down the megaphones and engage with the substantive ideas—it is why we are all here.

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Cartoon By Ali



THE DOCKET

TIME	EVENT	LOCATION	COST	FOOD?
WEDNESDAY – February 28, 2018				
11:00AM - 2:00 PM	JLSA Hamantaschen Sale Against Gun Violence	WB 278	Free	Delicious cookies benefit Everytown for Gun Safety
11:30-1:00 PM	FedSoc Presents: Judge Amul Thapar	WB 278	Free	Yes
12:00 PM	VJIL Lunch Talk: Professor Verdier	WB 126	Free	Yes
12:30	Starting a Law Firm Round Table	WB 121	Free	Yes
6:00 PM	Free Knit Night	Gordonsville Library	Free	No
7:15 PM	<i>Heathers</i>	Alamo Drafthouse Charlottesville	\$5	Free corn nuts
THURSDAY – March 1, 2018				
12:00-1:00 PM	ACS Meet & Greet with 5 th Cir. Candidate Andrew Sneathern	WB 101	Free	Snacks
1:00 PM	Justice Stephen Breyer: “The Court and the World”	Caplin Auditorium / WB 126	Free	No backpacks or laptops allowed in venue
6:00 PM	Spring Softball Captain Interest Meeting	WB 101	Free	No carbs while bulking, dude!
FRIDAY – March 2, 2018				
11:30 AM	Going Federal, Part I: Straight Through From a 2L Internship	Purcell	Free	Lunch with RSVP
3:30 PM	Journal Tryout Weekend 2 Begins	Purcell	Free	Black coffee, the bitter tears of despair
SATURDAY – March 3, 2018				
7:30 PM	The Parking Lot Movie	The Paramount Theater	\$7	Available for purchase
7:30 PM	Classical Guitar Concert: Elliot Frank	The Haven	Free	
SUNDAY – March 4, 2018				
2:00 PM	Little Women	Tandem Friends School	\$10	
MONDAY – March 5, 2018				
Spring Break				
TUESDAY – March 6, 2018				
Spring Break				
WEDNESDAY – March 7, 2018				
Spring Break				

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