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DATA LEAKS AND WHISTLEBLOWERS

By Audrey Moorehead

In April 2023, Jack Teixeira, a Massachusetts National Guardsman, was arrested in connection to the leak of many highly classified US military documents. Teixeira had sent photos of the documents to a private Discord server. These documents revealed key sensitive information about both US military movement, the movements of US allies, and intelligence the military had regarding global conflicts like the ongoing war between Russia and Ukraine. The breadth and depth of the information Teixeira shared online have caused some political and media figures to speculate that this leak may be one of the most severe and damaging data leaks of the century.



A courtroom sketch depicting the hearing of Jack Teixeira, accused of violating the Espionage Act.

Associated Press

Teixeira's leak is only the latest in a long history of compromised US intelligence. Indeed, after the story of Teixeira's leaks broke, many American news outlets put together lists of past famous intelligence leaks, such as the Pentagon Papers in the 1970s, Edward Snowden's and Chelsea Manning's collaborations with Wikileaks in the 2010s, and most recently the bombshell leak of the US Supreme Court's Dobbs decision (Elving 2023). However, in the digital age, it seems that leaks like these are getting more frequent and more dangerous. Teixeira's case is a perfect example of the glaring problems with the US's ability to protect its own classified information: before enlisting, Teixeira had a history of problems in school, and had been "caught viewing intelligence not related to his work" multiple times after being granted security clearance which he was repeatedly reprimanded for (Graham 2023). Even more concerning is the lack of clarity regarding Teixeira's motives for leaking the documents; he has yet to offer a motive, political or otherwise, for his actions. Such devastating breaches certainly warrant the attention of the National Security Council.

Still, when considering punitive or other measures to safeguard national intelligence data, it is important to remember past leaks which have exposed government corruption. How ought national

Wikileaks – online publisher which publishes classified documents provided by anonymous sources.

Whistleblower – a person who reveals information about an organization’s illicit activities.

In 2013, 54% of Americans said the government should pursue a criminal case against NSA leaker Edward Snowden.

security concerns be balanced with the people’s right to information? When is a data leaker a threat to national safety or a courageous whistleblower?

Historical Development

National security leaks have occurred in the US since the *Boston Gazette* published the Hutchinson letters in 1772, causing mass outrage among Massachusetts citizens who felt the British were infringing upon their rights (Smithsonian 2023). Leaks such as this have a complicated place in the US national history; on one hand, leaks such as that of the Hutchinson letters have led to important national events (including the nation’s founding); on the other, the primary concern of such leaks is that they will be used with malicious intent. The problem for the US government, then, has always been striking a balance between punishing leakers who reveal damaging secrets and protecting **whistleblowers** who bring light to important issues.

One such whistleblower, Daniel Ellsberg, was responsible for perhaps the most famous intelligence leak in US history, the Pentagon Papers (Moran 2023). Ellsberg was a defense analyst whose experiences with Vietnam led him to the conviction that the Vietnam War was “based on systematic deception by the government” (Moran 2023). As such, Ellsberg decided to leak the Pentagon Papers (a compilation of data on the Vietnam War created by the government) to the *New York Times* after efforts to provide it to Senators were rebuffed (Moran 2023). This leak brought attention to two of the most prevalent issues regarding government national security data: for then-President Richard Nixon, the question was how the government ought to respond to the leak of its classified, sensitive information; for the American people, the leak proved that the government was vulnerable to corruption and deceiving its people.

Since this time, similar data leaks have been highly controversial, and the American public often has mixed opinions on the leaks themselves. When Edward Snowden leaked classified information about NSA surveillance in 2013, opinion on whether the leak served public interest was split, but most Americans still believed he ought to be prosecuted (Geiger 2018). The issue became still more complicated: regardless of their opinions on the leaks themselves, Americans overall became more disapproving of the NSA surveillance programs (Geiger 2018). Organizations such as **Wikileaks** are dedicated to exposing similar government wrongdoing and are similarly controversial.

In 2010, Chelsea Manning leaked 750,000 classified documents about military efforts in Iraq and Afghanistan to Wikileaks.

Meanwhile, in the wake of Teixeira’s data leak, journalists and some government officials have speculated that leaks may become more common and more damaging. As information on the internet becomes more and more difficult to track, as was the case with Teixeira’s Discord messages, experts worry that more leakers will follow in Teixeira’s footsteps. As the rest of the private tech sector grapples with individuals’ heightened privacy concerns, so too is the US government now grappling with how best to maintain its own privacy while balancing its citizens’ interests in government transparency.

Scope of the Problem

No two data leaks are the same, and each national security leak brings unique considerations to the table. While this briefing will principally rely upon the leaks perpetrated by Edward Snowden, Chelsea Manning, and Jack Teixeira as case studies, the problems illustrated by these cases arise whenever significant government data breaches occur.

National Security Interests

The foremost problem that occurs because of data leaks is a threat to US national security interests. Some experts, such as Erik Dahl, worried that Teixeira’s leak was even more dangerous for American intelligence and national security than previous leaks such as Snowden and Manning” (Just Security 2023). Teixeira’s documents revealed “the extent of US eavesdropping on key allies” and “the degree to which the US has penetrated the Russian Ministry of Defense and... the Wagner Group” (Atwood and Bertrand 2023). These details jeopardize not only key US ally relationships but also individuals engaged in espionage in hostile states--- potentially endangering the lives of these spies, not only their missions.

Other leaks, such as Chelsea Manning’s leak of the **Iraq War Logs**, have compromised US intelligence sources who are citizens or opposition leaders in countries with strong authoritarian governments hostile to the US. Defense experts speculated that the leak of the Iraq War Logs caused many to have to be relocated or placed in hiding to avoid retribution. Thus, such leaks endanger not only US citizens but important informants in other regimes as well.

International Allies

While all data leaks reveal sensitive information about US security interests, some include important, damaging information about US allies as well. For example, Teixeira’s leaks revealed critical information about military movements in Russia and Ukraine, potentially jeopardizing some of Ukraine’s operations. Furthermore,



Chelsea Manning, Iraq War Logs leaker, addresses reporters.

Getty Images

Iraq War Logs – 2010 document leak revealing sensitive information about US military activity in Iraq and Afghanistan in the mid-2000s.

the documents contained information on the US and its allies' plans for further aid to Ukraine, as well as planned military movements from some NATO allies. National security leaks and breaches do not only compromise national interests; they also create problems for US allies who entrusted the US with their sensitive information. Aside from directly jeopardizing allies' movements, these leaks could also damage US relationships with allies.

The People's Right to Know?

**National Security
Memorandum** –
*directive used to
promulgate
Presidential decisions
on national security
matters.*

While the two previous problems emphasize the dangers of a data leak, there is one complicating factor in their favor. The more famous historical security leaks become well-known for a reason: like the Pentagon Papers, they often reveal information about illegal or otherwise suspicious government activities. Chelsea Manning's Iraq War Logs revealed potential war crimes, prisoner abuses, and general misconduct by the US military (Bureau 2010). The Pentagon Papers revealed that the government was deceiving US citizens about the Vietnam Conflict. Edward Snowden revealed that the NSA was spying on citizens' phone records. When such leaks occur and cause public outcry, the government is put on the defensive: why was such information hidden from the American people? Why was the government intentionally deceiving its citizens?

In such cases, the leaks become especially controversial. Public opinion is often split on how such leaks should be addressed; for example, US citizens supported prosecuting Snowden, but their trust in the NSA also declined in the months after the leaks, despite changes introduced by President Obama (Geiger 2018). Politicians also take more direct stances on these issues, such as when President Obama commuted Chelsea Manning's sentence from 35 years to just seven (Gerstein and Wheaton 2017). The idea that the people might have a right to information often included in data leaks is politically divisive and provides the biggest roadblocks to any potential policy solutions, as some advocate for increased security or harsher punishments while others argue in favor of whistleblower protections.

The recent leak by Jack Teixeira is unique in this aspect because of Teixeira's apparent lack of political motivation for the leak. While leakers like Ellsberg, Snowden, and Manning each cited motivations related to exposing suspicious activity, Teixeira has thus far revealed no such intention. Does this make Teixeira's leak uniquely punishable?

National Security Council Action

Presidents and members of the National Security Council have taken action to prevent leaks before, especially because the NSC itself has been a target of such leaks. In 2021, President Biden signed a

National Security Memorandum “to improve the cybersecurity of National Security, Department of Defense, and Intelligence Community Systems” in accordance with his recent Executive Order on cybersecurity (White House 2021). During previous data breaches, the NSC has been known to investigate hacks and leaks and has in some circumstances set up special task forces to deal with particularly egregious data breaches. Overall, the NSC’s job in such crises is to determine what went wrong and advise the president on potential avenues to address crises in the future.

Other Policy Action

Congress has addressed national security leaks before. In 2010, Congress voted on the Data Breach Protection Act. In the wake of the Teixeira leaks, Congress members have also reintroduced data security measures and introduced investigations into how and why the leaks were able to occur for so long. However, lawmakers are also apprehensive about becoming too stringent regarding classified information and have made that clear to the Pentagon (Adragna and Gould 2023).



Protestors hold up signs expressing their support for NSA leaker Edward Snowden at a Paris demonstration in 2013.

Kenzo Tribouillard

Conservative View

Overall, conservatives are much more concerned with national security, and usually view data leaks of any kind as doing more harm than good. Conservatives promote more stringent national security measures and harsher punishments for data leakers. In the wake of Teixeira’s leak, *Wall Street Journal* columnist Daniel Henninger asked “how could it not happen,” criticizing the “national-security bureaucracy” that makes it more difficult to keep classified information on a need-to-know basis” (Henninger 2023). Conservative pundit Rick Lowry, meanwhile, argued against pardoning Edward Snowden in 2018, saying that he was not a “genuine whistleblower” because he did not pursue his concerns about NSA data collection through “lawful avenues, instead stealing and disclosing millions of sensitive documents (Lowry 2018). Thus, conservatives are typically more concerned with the detrimental effects of national security leaks and promote solutions that would mitigate these dangers.

Liberal View

The liberal view is more complicated in American politics. Liberals tend to advocate for government transparency, and Democratic politicians and pundits have advocated for better

protections for whistleblowers. One prominent example of liberals' tendency toward sympathy to whistleblowers is Barack Obama's commuting of Chelsea Manning's 35-year prison sentence, slashing it to just the seven years Manning had already served (Savage 2017); liberals agreed with the decision, and Amy Davidson Sorkin wrote in *The Atlantic* that Obama had many reasons to commute her sentence, including that her punishment was disproportionate to her crime (Sorkin 2017). However, Jack Teixeira's case showcased a different view, in which even hardline liberals questioned Teixeira's access to the sensitive information he ultimately compromised, as Tori Otten did in *The New Republic* based on Teixeira's "history of racist and violent behavior" (Otten 2023). In all, the left is much more likely to consider motives an important factor in discussing national security leaks.

Such a complex, multifaceted problem cannot be addressed by only one solution. When reviewing the following proposals, consider which could work together to resolve issues or which might have contradictory goals.

Increased Data Security Measures

Perhaps the most straightforward proposal on the table is an increase in basic security measures. These increased measures would prevent leakers like Jack Teixeira, who apparently first typed out and then began removing classified documents to carry out his leaks, from accessing or removing documents without appropriate authorization.

There are several fronts on which this problem can be addressed, both physically and digitally. In July 2023, Defense Secretary Lloyd Austin released a memo calling for "increased levels of physical security, additional controls to ensure documents aren't improperly removed, and the assignment of top-secret control officers to monitor users" (Baldor and Copp 2023). The Defense department is also working to increase accountability through tracking technology, but according to an official, leaders "don't want to impede the ability to share critical information across the government when necessary" (Baldor and Copp 2023).

Many lawmakers and defense officials believe that access to top secret information is widespread and difficult to track, and thus these security measures that are being taken in the wake of the Teixeira leaks are regarded as having the potential to solve these concerns.

However, the Defense Department has also dealt with criticism for "delays vetting new employees for security clearances and for over-classifying information" (Baldor and Copp 2023). Thus, the

Defense Department hopes to balance both the apparent need for increased security showcased by Teixeira’s leak and pressure from other entities, including both Republican Congress members and the Biden administration, to declassify materials (Adragna and Gould 2023). Indeed, Director of National Intelligence Avril Haines told *Politico* that overclassification has become a “more acute [problem], exacerbated by the growing amount of data available across a wide range of agencies,” and she cited a government report that found that “a single government agency” classified the equivalent of “49 million cubic feet of paper” every 18 months (Adragna and Gould 2023).

Political Perspectives on this Solution

There is broad support for increasing data security measures, as well as bipartisan concern regarding material overclassification. *Politico* quoted Senator John Cornyn (R-TX) as arguing that “the volume of classified materials has just exploded” and that less information should be classified overall and cited examples of the Biden administration’s efforts to declassify and publicize information more quickly than most administrations (Adragna and Gould 2023). The same report also cited bipartisan efforts to improve security and efforts to produce a bill changing the classification system for documents, both by decreasing classification and shrinking the number of individuals with highest security clearance.

According to a 2013 government report, one intelligence agency classifies a petabyte of data every 18 months.

Increased Internet Screenings & Regulations

Some pundits believe that the problem lies not only in data security, but also in the relaxed nature of the clearance screening process toward social media. Overall, these pundits believe that the answer is not only tightening security clearance to a smaller circle but also investigating those applying for clearance more stringently, particularly in regards to social media. In *The Atlantic*, David A. Graham asked why Teixeira was not stopped; Army veteran Kris Goldsmith answered that “[Teixeira’s] most objectionable stuff, he was doing... in relatively protected and private spaces” online (Graham 2023). Goldsmith suggested that “better screening” is needed, rather than “snooping into every Guard member’s social-media presence.”

Bernd Debusmann Jr, covering Teixeira’s story for *BBC*, reported that Teixeira “made violent threats and researched mass shootings online” after being granted security clearance (Debusmann 2023). Though public social media posts are part of the clearance process, Debusmann reports from a retired US Marine that a review “is only likely if their superiors have a reason to be alarmed” (Debusmann 2023). As such, Debusmann and others argue that increasing vetting of online behavior both before and after granting security clearance

would better prevent future leakers like Teixeira from being granted security clearance that could be damaging.

Of course, part of the problem with such measures is the degree to which online activity should be monitored. As Goldsmith told Graham above, no one wants to institute strict online surveillance. Indeed, given the recent issues between the government and social media companies regarding user privacy, such efforts would certainly be met with some form of opposition. For example, the American Civil Liberties Union (Al and Rather) argues that social media surveillance should not be “suspicionless” (Al and Rather 2023). Furthermore, the US government instituted a similar policy of tracking extremist material on military recruits’ social media in 2021, but if this program applied to Teixeira, it did not disqualify him from security clearance (Jacobs 2023). Thus, whether such a solution would be effective is a legitimate concern.

Criminal Punishment for Leaks

While the former two problems have come into sharper focus in the wake of the 2023 Teixeira case, the question of criminal punishment for leakers or whistleblowers has been central to nearly all national security breach cases. All of the aforementioned national security leakers/whistleblowers were criminally prosecuted for their actions under the Espionage Act, and as illustrated above in the case of Edward Snowden, the public has often supported criminal charges for whistleblowers regardless of their opinion on the materials leaked (Pew Research Center 2018).

In previous years, the government has argued that classified information leaks are more damaging to national interests than foreign spies (Aftergood 2019). In 2019, Justice Department attorneys said that “spies... pass classified national defense information to a specific foreign government,” but “leakers... distribute such information without authorization to the entire world” (Aftergood 2019). The government has argued that this warrants the felonies with which journalists are charged, and those in support of punishments for leakers argue along similar lines, as Rich Lowry argued about Edward Snowden above (Lowry 2018).

Opponents of harsh punishments for leakers argue that these punishments are disproportionate to the crimes committed. In fact, in 2014, Conor Friedersdorf argued that the government should not necessarily punish leakers simply for leaking classified information. Responding to an argument that the fear of prosecution is important to ensure that nothing too sensitive gets released, Friedersdorf argues that the determined government leaker will simply find another outlet for their leak. As such, journalists should not be punished for leaking classified information, and in the “least-bad

system,” leakers would only be punished if the government could prove significant harm (Friedersdorf 2014).

Political Perspectives on this Solution

As outlined above, as a general rule conservatives are more in favor of legal ramifications for intelligence leaks, while liberals tend to decide on a case-by-case basis. In cases like the Iraq War Logs or the Pentagon Papers, proof of government wrongdoing can justify the leaks as in the national interest; in cases like Teixeira’s leaks, where his motivations are less clear, then they believe prosecution should be pursued.

Protections or Pardons for Whistleblowers

Finally, and perhaps most controversially, one must consider what protections or pardons government whistleblowers ought to be offered. While the federal government offers protection from discrimination for whistleblowers who use government channels to provide information about illicit activities, leakers like Snowden, Manning, Ellsberg, and Teixeira did not use such channels. Even so, many Americans believe that these leakers ought to receive similar protections. Before President Obama commuted Chelsea Manning’s sentence in 2017, Manning had received support on the grounds that “her 3 ½ -decade sentence was wildly out of proportion to those received by other leakers” (Gerstein and Wheaton 2017). Meanwhile, organizations including **Amnesty International** have argued that Edward Snowden should be pardoned because of his work exposing “the shocking extent of global mass surveillance” and the “high price” he has paid for this exposure (Amnesty International 2023).

Generally, organizations and individuals in favor of relaxing punishments on whistleblowers argue that their work served the public interest in some way. Indeed, Snowden’s leaks resulted in NSA reform, and Ellsberg’s leaks contributed to the end of US involvement in Vietnam. Additionally, Conor Friedersdorf argued that national security leaks are rarely as harmful as the government claims they will be (Friedersdorf 2014). Thus, if the work done by the whistleblower ultimately does more good than harm, their sentences ought to be commuted or they ought to be pardoned.

However, others argue that whistleblowers ought to expose illicit actions through legal means rather than by exposing to the press or Wikileaks. Opponents to pardons argue that the fact that whistleblowers like Snowden and Manning did not pursue legal avenues to expose their information makes them traitors rather than whistleblowers, and they should be tried as such.

Political Perspectives on this Solution

***Amnesty
International –
international non-
governmental
organization (NGO)
advocating for
human rights.***

As mentioned above, liberals are generally more in favor of pardons or commuting sentences if whistleblowers have exposed government abuses. However, conservatives take a much more hardline stance on such public, high profile cases. For example, when President Obama commuted Chelsea Manning’s sentence, Republicans across the board decried the pardon, arguing that Manning was a “traitor” and Obama’s decision would create a “dangerous precedent” (Gerstein and Wheaton 2017).

In fiscal year 2021, the National Security Council’s estimated funding requirement was \$13,200,000 (Congressional Budget Submission). This funding includes funding for the Homeland Security Council. It could be used for research into different policy proposals or to implement programs that might increase security requirements. Overall, you should remember that the National Security Council is primarily an advisory council.

Classified information leaks present a unique problem in the modern era. As illustrated by the undetected and extensive leaks perpetrated by Jack Teixeira, in the internet age the government is more and more susceptible to compromised classified information. When information is compromised, this can damage not only US military goals but also the goals of our allies and endanger the lives of US spies or informants.

Conversely, in some cases national security leaks reveal major government abuses. In these cases, leakers’ actions may align with the national public interest, and as such, debate arises over whether they ought to be punished for breaking laws or protected and pardoned because they acted in the public interest.

As the National Security Council, you must work to balance the interests of the public with the sensitivity of military information, especially as the public itself is often divided when it comes to punishing leakers or appreciating the information they have provided. Such a balance is not easy to strike, and it may need to be evaluated on a case-by-case basis, especially as the National Security Council changes in each presidential administration. What recommendations could the NSC make that would best address the interests of both conservatives and liberals, or both the military and the public?

No one solution will be perfect, and given that leaks have occurred since the country’s founding, this issue will likely never be fully resolved. As such, focus on presenting solutions that you feel might address the most important gaps in national security, or might best address questions about human rights abuses. If you feel there

is another policy idea that is not presented in this briefing, feel free to research and propose it yourself at the conference, especially if it will solve multiple facets of the issue.

Be on the lookout for any further data leaks or whistleblower cases. Additionally, research how other countries deal with similar problems or how leaders from each party have responded to data leaks in the past.

Pay special attention to NSC briefings or press releases regarding data leaks, as well as the ongoing prosecution of Jack Teixeira. Research the other high-profile leaks listed in this briefing, including the Iraq War Logs, the Pentagon Papers, and the Snowden NSA leaks, and review what actions were taken either to prevent future leaks or to discipline or protect the leakers. Have there been more developments in any ongoing cases?



A protestor carries a “Free Chelsea” sign.

Reuters

Amnesty International – international non-governmental organization (NGO) advocating for human rights.

Iraq War Logs – 2010 document leak revealing sensitive information about US military activity in Iraq and Afghanistan in the mid-2000s.

National Security Memorandum – directive used to promulgate Presidential decisions on national security matters.

Whistleblower – a person who reveals information about an organization’s illicit activities.

Wikileaks – This is where you will provide definitions of all words that you included in the left-hand margins of the briefing. Please review this glossary after completing your briefing in order to ensure that

Adragna, Anthony, and Joe Gould. “Congress to Pentagon: Don’t go too far in locking down classified info.” Politico.com, 2023, <https://www.politico.com/news/2023/04/25/congress-pentagon-classified-documents-leak-00093700>. Accessed 18 July 2023.

Al, Layla, and Shaiba Rather. “Is the Government Tracking Your Social Media Activity?” aclu.org, 2023, <https://www.aclu.org/news/national-security/is-the-government-tracking-your-social-media-activity>. Accessed 18 July 2023.

Amnesty International. “Why Edward Snowden should be pardoned.” Amnesty.org.uk, 2023, <https://www.amnesty.org.uk/edward-snowden-nsa-whistleblower-pardon>. Accessed 18 July 2023.

Atwood, Kylie, and Natasha Bertrand. “Leaked Pentagon documents provide rare window into depth of US intelligence on allies and foes.” Cnn.com, 2023, <https://www.cnn.com/2023/04/09/politics/pentagon-leaked-documents-us-spying-allies-foes/index.html>. Accessed 18 July 2023.

Baldor, Lolita, and Tara Copp. “After secret documents leak, Pentagon plans tighter controls to protect classified information.” Apnews.com, 2023, <https://apnews.com/article/classified-document-leaks-russia-military-guard-bb5ebe646b0f8a657d4c83e1e519b687>. Accessed 18 July 2023.

The Bureau. “Iraq war logs: The real and uncensored story of the war.” Thebureauinvestigates.com, 2010, <https://www.thebureauinvestigates.com/stories/2010-11-03/iraq-war-logs>. Accessed 18 July 2023.

“Congressional Budget Submission: Fiscal Year 2021.” Trumpwhitehouse.archives.gov, 2021, <https://trumpwhitehouse.archives.gov/wp-content/uploads/2020/02/FY21-Budget.pdf>. Accessed 18 July 2023.

Debusmann, Bernd Jr. “Jack Teixeira: How are US security clearances handled?” bbc.com, 2023, <https://www.bbc.com/news/world-us-canada-65415971>. Accessed 18 July 2023.

Elving, Ron. “The latest saga of revealed U.S. secrets stirs memories of past legendary leaks.” Npr.org, 2023, <https://www.npr.org/2023/04/15/1169935572/history-leaks-intelligence-documents>. Accessed 18 July, 2023.

Friedersdorf, Conor. “Why It Shouldn’t Be Criminal to Report Government Secrets.” Theatlantic.com, 2014, <https://www.theatlantic.com/politics/archive/2014/06/the-pointlessness-of-prosecuting-journalists-who-publish-leaks/372381/>. Accessed 18 July 2023.

Geiger, A.W. “How Americans have viewed government surveillance and privacy since Snowden leaks.” Pewresearch.org, 2018, <https://www.pewresearch.org/short-reads/2018/06/04/how-americans-have-viewed-government-surveillance-and-privacy-since-snowden-leaks/>. Accessed 18 July 2023.

- Gerstein, Josh, and Sarah Wheaton. "Obama commutes Chelsea Manning's sentence." Politico.com, 2017, <https://www.politico.com/story/2017/01/obama-commutes-chelsea-mannings-sentence-233722>. Accessed 18 July 2023.
- Graham, David. "Jack Teixeira Should Have Been Stopped Again and Again." Theatlantic.com, 2023, <https://www.theatlantic.com/ideas/archive/2023/05/jack-teixeira-leak-national-secrets/674236/>. Accessed 18 July 2023.
- Henninger, Daniel. "Our Jack Teixeira Problem." Wsj.com, 2023, <https://www.wsj.com/articles/jack-teixeira-leaked-secrets-espionage-spy-military-discord-minecraft-ukraine-riot-beating-chicago-cultural-decline-3de3216c>. Accessed 18 July 2023.
- "The Hutchinson Letters". Postalmuseum.Si.Edu, 2023, <https://postalmuseum.si.edu/exhibition/out-of-the-mails-the-franking-privilege/the-hutchinson-letters>. Accessed 18 July 2023.
- Jacobs, Emily. "Pentagon launches program to surveil military personnel's social media." Nypost.com, 2021, <https://nypost.com/2021/05/18/pentagon-to-surveil-military-personnels-social-media/>. Accessed 18 July 2023.
- Just Security. "The Teixeira Breach: What Top Intelligence and Legal Experts are Saying." Justsecurity.org, 2023, <https://www.justsecurity.org/86007/the-teixeira-breach-what-top-national-security-experts-and-senior-former-intelligence-officials-are-saying/>. Accessed 18 July 2023.
- Lowry, Rich. "Don't Pardon Snowden." Nationalreview.com, 2020, <https://www.nationalreview.com/2020/12/dont-pardon-snowden/>. Accessed 18 July 2023.
- Moran, Jordan. "Nixon and the Pentagon Papers." Millercenter.org, 2023, <https://millercenter.org/the-presidency/educational-resources/first-domino-nixon-and-the-pentagon-papers>. Accessed 18 July 2023.
- Otten, Tori. "How in the World Did the Pentagon Leaker Get Top Security Clearance?" Newrepublic.com, 2023, <https://newrepublic.com/post/172261/world-pentagon-leaker-get-top-security-clearance>. Accessed 18 July 2023.
- Savage, Charlie. "Chelsea Manning to Be Released Early as Obama Commutes Sentence." Nytimes.com, 2017,

<https://www.nytimes.com/2017/01/17/us/politics/obama-commutes-bulk-of-chelsea-mannings-sentence.html>. Accessed 18 July 2023.

White House Briefing Room. “FACT SHEET: President Biden Signs National Security Memorandum to Improve the Cybersecurity of National Security, Department of Defense, and Intelligence Community Systems.” Whitehouse.gov, 2023, <https://www.whitehouse.gov/briefing-room/statements-releases/2022/01/19/fact-sheet-president-biden-signs-national-security-memorandum-to-improve-the-cybersecurity-of-national-security-department-of-defense-and-intelligence-community-systems/>. Accessed 18 July 2023.