...Legal Studies 133AC – Spring 2022 Professor Kathy Abrams Course Information and Syllabus

#### **Instructor Information:**

Kathy Abrams (Instructor)

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Please email me if you plan to come to office hours, and I will send you a link to the zoom room.

#### **Course Information**

This course will meet weekly on **Wednesdays 3-6 pm**. We will respect the "Berkeley start time" of 3:10; however, I expect people to arrive a minute or two before, so that we can actually begin at 3:10. The first class will be Wednesday, January 19. We will not meet on Wednesday, March 23 (this is the week of spring break). The last class will be Wednesday, April 27.

Please use the following link to join the class Zoom Meeting

https://berkeley.zoom.us/j/96073300952?pwd=NStBNWRwYUp6NngzRnBORWJxY2ViZz09

In case you have to enter the meeting in a different way, you should also have the following information:

Meeting ID: 960 7330 0952

Passcode: 168180

# **Course Description**

This course will explore the obstacles faced by undocumented immigrants in the United States, arising from federal immigration law and enforcement policy, state alienage laws applicable to immigrants, and stigmatizing media and cultural discourses. Our primary focus will be on the ways that immigrants and their allies -- increasingly led by undocumented people themselves --have organized and mobilized, forming a robust social movement under circumstances in which many observers and scholars would not have predicted it. We will examine the distinctive challenges that accompany the mobilization of participants without legal status, and the practices that immigrant organizations have developed to surmount those challenges. And, using a framework that highlights these practices -- of storytelling, emotion management, and performative citizenship -- we will examine the strategy and tactics deployed by the movement to engage political actors at both federal and state levels, primarily during the (George W.) Bush, Obama, and Trump administrations; but there will be some focus toward the end of the course on the performance of and challenges facing the Biden administration. As we turn to state

policies and mobilizations, we will focus on two states – Arizona and California – which have followed divergent paths in their treatment of immigrants.

Because this is an American Cultures Engaged Scholarship course, this classroom component is supplemented with community-engaged work on behalf of immigrants. This year, given the circumstances of the COVID pandemic, much of our work will be remote. For some organizations, there may be work on site as the semester progresses. Our community partners this semester will be:

**East Bay Sanctuary Covenant** (EBSC), an organization that provides legal services to, and public education and advocacy for, immigrants and those seeking asylum.

**Freedom for Immigrants** (FFI), an immigrant detention abolition organization, which also serves immigrants in detention (and recently released from detention) and their families.

**Immigrants Rising** (IR), an organization that supports the leadership of, and develops policy for, and advocates on behalf of, undocumented youth, particularly in the areas of education and entrepreneurship.

**Multicultural Institute** (MI), which organizes day laborers, and provides a variety of programs for immigrant workers and their families.

The programs and projects for which these organizations seek students' assistance will be discussed the first day of class. After reviewing a questionnaire you will fill out the first day of class, discussing your background, skills, and preferences, I will assign each of you to a particular community partner. Even those who work with other organizations will likely participate in FFI's online campaigns and immigration court activities. The class will receive an orientation to FFI on January 26, as its abolitionist agenda will be relevant to the content of the course.

#### **Course Readings**

Course readings will consist of excerpts from academic articles and books, cases, mainstream and social media coverage of events and campaigns, blog posts, and occasional videos. All readings will be posted on the "modules" page of our bcourses site, organized by week, unless otherwise noted.

#### **Course Requirements**

1) Students will be required to complete readings (which will be posted on our bcourses site) and participate in class discussions each week. We will be taking attendance in class through a googleform, in which you will also record community partner hours, each week. (Of course you will be excused if you are ill, or have another emergency or family

- obligation; please let me know as soon as possible.). Participation will also include occasional in-class short writing exercises sometimes through online platforms like jamboard. Class participation will be considered in grading, if students are on the line between two grades.
- 2) Students will also be required to work 3-4 hours each week with their Community Partner, on the project(s) to which they have been assigned. All students will log their community engagement hours for each week, on a googleform that will be circulated in class. Community Engagement hours will be totaled at the end of the semester and will count for 15% of students' total grade.
- 3) Students will be required to write a 4-5 page midterm paper on their work with their community partner. This paper will be due in the first part of March (precise date TBA). In this paper, students will briefly describe their organization, and the tasks on which they have been working. More importantly students will be asked to reflect on what their organization and its role in the lives of immigrants, and their own understanding of community service, as a result of their work. This paper will count for 20% of students' total grade.
- 4) During the last two weeks of class, students will be required to make a group presentation to the class on their community partner work. Students will be grouped according to the community partner with whom they have worked. Student groups will be encouraged to reflect on what they have learned about their organization, its impact on the lives of immigrants, and the challenges of providing service to immigrant communities, as a result of their work. Each student on the team should have a planning role, and a speaking role, in this presentation. Once again, student may provide audio or visual content (ie, powerpoints, charts or short videos) to accompany their presentations, but no paper will be required. This presentation will count for 15% of students' grade. Students will be graded as a team; all members of the team will receive the same grade for the presentation.
- 5) At the end of the semester students will be required to complete a 6-8 page final paper. This paper will ask students to draw connections between what they learned through their work with their community partner and the major themes of the course (as reflected in the readings and class discussion). This paper will be due on a date TBA during reading or exam period, and will count for 50% of students' grade.

### **Course Syllabus**

Please note: The following readings are for the "classroom" component of the course. There will be occasional readings to accompany your community partnership work, particularly on the topic of detention abolition; I will announce and post these separately. This syllabus is also provisional: I may reduce readings – particularly in the second half of the course — if the load seems too heavy, or if we need to spend more time on community partner discussions. I may also substitute readings, if something new is published that will be more useful. But this syllabus describes most of the articles and media pieces we will be reading, and gives you a sense of the kinds of resources on which we will draw. All readings will be posted on the bcourses "modules" page, by week.

#### I. Undocumented Migration: Historical, Legal and Sociological Perspectives

# Week 1 (January 19) – Undocumented Migration in Historical Perspective

(Andrea Wise and Victoria Robinson, guest speakers, on Community Engagement)

Leti Volpp, Impossible Subjects: Illegal Aliens and Alien Citizens [Review essay on Mae Ngai, Impossible Subjects], 103 Mich. L. Rev 1626 (2004-05).

#### Week 2 (January 26) – The Paradox of Immigrant Organizing

Kathryn Abrams, **Open Hand, Closed Fist: Practices of Undocumented Organizing in a Hostile State** (forthcoming 2022) [excerpts from Chs 2-3]

[We will also have an orientation from Freedom for Immigrants during this class session]

# Week 3 (February 2) – An Introduction to Immigration Law

Victor Romero, Everyday Law for Immigrants (2009) [Ch 2, 3]

Leisy Abrego and Cecilia Menjivar, Legal Violence in the Lives of Immigrants: How Immigration Enforcement Affects Families, Schools, and Workplaces, Center for American Progress [focus on pp. 1-10; read more if you like] (2012).

[We may also have an orientation from East Bay Sanctuary Covenant during this class session]

# I. Engaging the Federal Government (Part I)

# Week 4 (February 9) - Prelude: the Big Marches of 2006

National Conference of State Legislatures, The Sensenbrenner Bill (HR 4437) (2005)

Bloemraad and Voss, Rallying for Immigrant Rights (2011).

- Chapter 2: Wang & Winn, Groundswell Meets Groundwork
- Chapter 13: Suro, Out of the Shadows, Into the Light

Chris Zepeda Millan, Weapons of the Not-So-Weak: Immigrant Mass Mobilization in the US South, 42 Critical Sociology 1-19 (2016).

#### Week 5 (February 16) - DREAM Act to DACA: Youth Organizing for Membership

Roberto Gonzales, Learning to Be Illegal: Undocumented Youth and Shifting Legal Contexts in the Transition to Adulthood, 76 Amer. Sociol. Rev. 602, **603-06** ["Undocumented Youth and Shifting Contexts"] **607-15** ["The Transition to Illegality"] (2011).

Dream Act (S. 3992) (2010)

Walter Nicholls, The DREAMers (Ch 2: The Birth of the DREAMer) (2015).

TruthOut Archives, Dream Activists: Resisting the Nonprofit Industrial Complex, September 21, 2010

http://www.truth-out.org/archive/item/91877:dream-activists-rejecting-the-passivity-of-the-non-nprofit-industrial-complex

Cristina Beltran, Undocumented, Unafraid, and Unapologetic: DREAM Activists, Immigration Politics, and the Queering of Democracy, **1-5** (top) [Introduction], **13-25** ["DREAMers Online: Multiple Voices and New Affective Terrain"], **28-30** ["No Deference: Confronting Obama and the Fight for Administrative Relief"] (manuscript, later published under same title, in Danielle Allen and Jennifer Light, **From Voice to Influence: Understanding Citizenship in a Digital Age** (2015)).

[in class] DREAMers Adrift, Undocumented and Awkward, Ep 8 ("Problem Addicts"), Video to the President ("Obama, Don't Deport My Mama")

The White House: Office of the Press Secretary, Remarks by the President on Immigration, June 15, 2012,

https://obamawhitehouse.archives.gov/the-press-office/2012/06/15/remarks-president-immigration

# II. Organizing at the State Level

Week 6 (February 23) - Organizing in a Responsive State: From Prop 187 to AB 540

Migration News, Prop 187 Approved in California, December 1994

Plyler v. Doe, 457 U.S. 202 (1982)

Patrick O'Donnell, Prop 187 Found Unconstitutional by Federal Judge, LA Times, November 15, 1997

Jack Citrin and Benjamin Highton, How Race, Ethnicity and Immigration Shape the California Electorate, Report for the Public Policy Institute of CA (2002)

USC Center for Higher Education Policy Analysis, AB 540 Guide

Leisy Abrego, Legitimacy, Identity, and the Social Mobilization of Law: The Effects of AB 540 on Undocumented Students in California, 33 L. & Soc. Inq. 709 (2008)

[In-class videos] PBS, Prop 187: The Rise of the Latino Vote (2020); "Thank you, Gray Davis"

# Week 7 (March 2) Organizing in a Hostile State I: Resisting "Attrition by Enforcement"

Kris Kobach, Reinforcing the Rule of Law: What States Can and Should do to Reduce Illegal Immigration, 22 Geo. Immig. L. J. 459 (2008) [read 459-65; you can read more about specific legal restrictions in the sections following if you'd like more detail].

Arizona State Senate, Information Sheet on SB 1070

Joe Hagan, The Long Lawless Ride of Joe Arpaio, Rolling Stone, August 2, 2012

Carlos Garcia (Director/Lead Organizer, Puente) and Annie Lai (Co-Director UC-Irvine Immigrant Rights Clinic, formerly of ACLU-Arizona), Class Interview (March 2016) [read at least pp. 1-4 on formation of Puente, you may also want to read about the lawsuits against Arpaio pp. 4-13.]

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Jorge Rivas, Four Undocumented Arizonans Arrested for Coming Out During Arpaio's Trial, Colorlines.com, July 25, 2012,

https://www.colorlines.com/articles/four-undocumented-arizonans-arrested-coming-out-arpaios-trial [use link to access video]

Juan Escalante, Five Years After SB 1070, Arizona Immigrant Community Marks Victories and Arpaio is on Trial for Contempt, America's Voice, April 24, 2015,

https://americasvoice.org/blog/five-years-after-sb-1070-arizona-immigrant-community-marks-victories-and-arpaio-is-on-trial-for-contempt/

[In-class: Carlos Sandoval and Catherine Tambini, The State of Arizona: Battle Over Illegal Immigration [documentary](2014)]

# Week 8 (March 9) Organizing in a Hostile State II: Building toward the Future

Monica Alonzo, SB 1070 Fuels a Movement of New Voters, Phoenix New Times, July 5, 2012

Kathryn Abrams **Open Hand, Closed Fist** [excerpt from Ch 3]

Griselda Navarez, Awakened by SB 1070, One Arizona Now a Model for Latino Voter Registration, NBC News, Sept 28, 2016

https://www.nbcnews.com/news/latino/awakened-sb1070-one-arizona-now-model-latino-voter-registration-n647891?icid=related

Marisa Franco, How a Bus Full of Undocumented Families Could Change the Immigration Debate, Yes! Magazine, November 30, 2012.

Mari Cruz Ramirez Jimenez, In Admiration: Learning About the Civil Rights Movement, August August 16, 2012

http://nopapersnofear.org/blog/post.php?s=2012-08-16-in-admiration-learning-about-the-civil-rig hts-movement

Aura Bogado, Dignity Beyond Voting: Undocumented Immigrants Cast their Hopes, Colorlines, October 25, 2012

Kemi Bello, Barred from Voting, Undocumented People Create New Forms of Political Participation (dispatch from <a href="http://nopapersnofear.org/">http://nopapersnofear.org/</a>) [In-class video: "Sí No Nos Invitan, Nos Invitamos Solos"]

# III. Engaging the Federal Government (Part II)

# Week 9 (March 16): From CIR to Not1More Deportation

Senate Testimony of Gabby Pacheco (on CIR bill, S. 744)

Hesson, United We DREAM Releases Its Immigration Reform Platform, Dec. 3, 2012, ABC News <a href="http://abcnews.go.com/ABC">http://abcnews.go.com/ABC</a> Univision/News/dreamers-focus-immigrant-rights-enforcement/st ory?id=17870814

Hesson, from Nine DREAMer Actions that Advanced Immigration Reform, August 10, 2013, ABC News, http://abcnews.go.com/ABC\_Univision/dreamer-protests-advanced-immigration-reform/story?id=19915997#

Selected Articles on the Death of Comprehensive Immigration Reform

Open Letter to the Immigrant Rights Movement: Our Families Can't Wait, January 15, 2014

Carlos Garcia (Exec Dir, Puente-AZ), Class Interview, March 17, 2015

Selected News Coverage of Bus Actions and Hunger Strike

Blue Ribbon Commission on Deportation Review, April 10, 2014

Kathryn Abrams, Contentious Citizenship: Undocumented Activism in the Not1More Deportation Campaign, 26 La Raza L.J. 46 (2016) [through p. 64]

# [No class on March 23 - Spring Break]

# IV. Organizing Under Trump

# Week 10 (March 30): Organizing Under Trump: Sanctuary States and Preserving Momentum

Executive Order on Border Enforcement [for reference]

Executive Order on Interior Enforcement [for reference]

Jennifer Chacon, Immigration and the Bully Pulpit, 130 Harv. L. Rev. 243 (2017)

Chris Benderev, Lawmakers Vote to Make California a Sanctuary State, NPR, September 16, 2017

Darla Cameron, How Sanctuary Cities Work and How Trump's Stalled Executive Order Might Affect Them, Washington Post, January 18, 2017

Erwin Chemerinsky, Annie Lai, and Seth Davis, Trump Can't Force 'Sanctuary' Cities to Enforce His Deportation Plans, Washington Post, December 22, 2016

Trump's War on Sanctuary Cities (Axios, NYT)

Marcela Valdez, Is It Possible to Resist Deportation in Trump's America, New York Times, May 23, 2017

Alejandra Gomez and Tomas Robles, How to Turn Anger and Fear into Political Power, New York Times, December 21, 2019

# Week 11 (April 6): Organizing Under Trump: The Enhanced Enforcement and the Refugee Crisis

Priyanka Boghani, A Guide to Some Major Trump Administration Immigration Policies, Frontline/PBS, October 22, 2019,

https://www.pbs.org/wgbh/frontline/article/a-guide-to-some-major-trump-administration-immigration-policies/

Supreme Court Allows Trump Administration Policies to Take Effect as Litigation Proceeds (articles from NYT, Politico)

Laura Carlson, Why The Refugee Caravan is So Big – and What We Need To Do About it, The Nation, November 2, 2018

https://www.thenation.com/article/refugee-caravan-honduras-mexico/

Nicole Acevedo, Who is Pueblo Sin Fronteras, the group behind the migrant caravan that drew Trump's Ire, NBC News, April 4, 2018,

https://www.nbcnews.cFom/news/latino/who-s-behind-migrant-caravan-drew-trump-s-ire-n86 2566

Ian Allen, Trump's "Caravan" is a Made-Up Monster Fabricated by the Far Right, The Nation, February 8, 2019,

https://www.thenation.com/article/caravan-white-supremacist-campaign-trump/

Muzzafar Chishti and Sarah Pierce, Crisis Within a Crisis: Immigration in the US at a Time of COVID-19, Migration Policy Institute, March 26, 2020, <a href="https://www.migrationpolicy.org/article/crisis-within-crisis-immigration-time-covid-19">https://www.migrationpolicy.org/article/crisis-within-crisis-immigration-time-covid-19</a>

Protect Immigrant Communities: Fear Mounts of Deadly COVID-19 Outbreak in Border Camps, ICE Jails, Democracy Now, April 3, 2020.

# Week 12 (April 13): Immigrant and Refugee Policy in the Biden Administration

Biden Administration Suspends Cooperative Asylum Agreements with the Northern Triangle, Columbia J. of Transnational L. (2021).

Reimplementation of Remain in Mexico, justiceforimmigrants.org (last updated August 2021).

Ted Hesson and Mica Rosenberg, U.S. to end COVID Order Blocking Asylum Seekers at Border with Mexico, reuters.com (April 1, 2022).

Alexander Bolton, Title 42 Disputes Threatens to Hold Up \$10 billion COVID Relief Package, thehill.com (April 5, 2022).

Henry Gass, Why Biden's Immigration Policy Looks a Lot Like Trump's, csm.com (February 7, 2022).

Zolan Kanno-Youngs, Michael Shear, and Eileen Sullivan, Disagreement and Delay: How Infighting Over the Border Divided the White House, nyt.com (April 9, 2022).

Week 13 (April 20) - Community Partner Team Presentations

**Week 14 (April 27) – Community Partner Team Presentations** 

**Appendix: Materials on Plagiarism and Academic Integrity** 

<u>Please read the following materials before you begin work on either of the required papers</u> for the course.

From: GSI Teaching and Resource Center, Berkeley Graduate Division, <a href="https://gsi.berkeley.edu/gsi-guide-contents/academic-misconduct-intro/plagiarism/">https://gsi.berkeley.edu/gsi-guide-contents/academic-misconduct-intro/plagiarism/</a>

#### 1) What is the potential problem?

#### **Plagiarism**

# **Forms of Plagiarism**

Plagiarism is defined as the use of intellectual material produced by another person without acknowledging its source. Some examples [1]:

- Copying passages from works of others into one's homework, essay, term paper, or dissertation, without acknowledgement.
- Use of the views, opinions, or insights of another, without acknowledgement.
- Paraphrasing another person's characteristic or original phraseology, metaphor, or other rhetorical device, without acknowledgement.

An increasingly common form of plagiarism is copying and pasting papers or articles from the internet, or simply purchasing prewritten papers from on-line paper mills. Hundreds of these sites have been identified. Fortunately, this sort of plagiarism is also increasingly easy to detect. For further information, see the Teaching Guide page <u>Detecting and Addressing Plagiarism</u>.

In addition, new concerns have arisen around the issue of plagiarism in the writing of computer code. Instructors who deal with questions of source-citation in coding may wish to consult the guide on **Academic Integrity in Code Writing** developed by MIT.

### 2) What are the causes of plagiarism? Does plagiarism have to be intentional?

Many instances of plagiarism are unintentional. In many cases students don't understand how to write in the ways people in a given academic field write, how to manage larger and more complex writing assignments, how to take good research notes, or how to interact fairly with other writers' ideas in their own work. [This does not, however, relieve students of responsibility for inappropriate attribution practices.]

#### 3) What UC-Berkeley academic rules bear on it?

From Berkeley Academic Guide; Academic Policy http://guide.berkeley.edu/academic-policies/#studentconductappealstext

#### Academic Misconduct, Cheating, or Plagiarism

Achievement and proficiency in subject matter includes your realization that neither is to be achieved by academic misconduct. An instructor has the right to give you an F on a single assignment produced by engaging in academic misconduct without determining whether you have a passing knowledge of the relevant factual material. That is an appropriate academic evaluation for a failure to understand or abide by the basic rules of academic study and inquiry. An instructor has the right to assign a final grade of F for the course if you plagiarized a paper for a portion of the course, even if you have successfully and, presumably, honestly passed the remaining portion of the course. It must be understood that any student who knowingly aids in plagiarism or other cheating, e.g., allowing another student to copy a paper or examination question, is as responsible as the cheating student.

If a student is found responsible for academic misconduct there will be a sanction applied. Sanctions range from a non-reportable warning through dismissal and may also include educational sanctions such as reflective writing assignment, activities, and workshops.

#### **UC-** Berkeley Policies on Academic Integrity (more broadly)

#### 1) From Center for Student Conduct, <a href="https://sa.berkeley.edu/conduct/integrity">https://sa.berkeley.edu/conduct/integrity</a>

The high academic standard at the University of California, Berkeley, is reflected in each degree that is awarded. As a result, every student is expected to maintain this high standard by ensuring that all academic work reflects unique ideas or properly attributes the ideas to the original sources. Individual departments often have their own ways of citing and attributing work, so it is the responsibility of each student to seek that information out if it is not otherwise provided through a syllabus, course website, or other means.

These are some basic expectations of students with regards to academic integrity:

- Any work submitted should be your own individual thoughts, and should not have been submitted for credit in another course unless you have prior written permission to re-use it in this course from this instructor.
- All assignments must use "proper attribution," meaning that you have identified the original source and extent or words or ideas that you reproduce or use in your assignment. This includes drafts and homework assignments!
- If you are unclear about expectations, ask your instructor or GSI.
- Do not collaborate or work with other students on assignments or projects unless you have been given permission or instruction to do so.

# 2) Berkeley Honor Code

https://teaching.berkeley.edu/berkeley-honor-code

The ASUC in conjunction with the Graduate Assembly, the Academic Senate, and the L&S Deans have developed a UC Berkeley Honor Code to support an environment of academic integrity and

respect on campus. While the statement of the Honor Code itself is brief, it is an affirmation of our highest ideals as Golden Bears:

# "As a member of the UC Berkeley community, I act with honesty, integrity, and respect for others."

We have come together for this effort not because we think the campus faces some sort of integrity crisis, or because we have detected signs of a worrisome trend. Rather, we share a belief that we, as a campus community, can do better and that we have an obligation as the nation's preeminent public university to assume a leadership role in this area. We recognize that the digital age, and the ease with which it fosters both collaboration and cutting corners, poses new challenges and questions when it comes to definitions, policies and practices. We believe that together we can evolve, refine and improve our approach to values that lie at the very core of who we are as a university.

The purpose of the Honor Code is to enhance awareness of the need for the highest possible levels of integrity and respect on campus, both within and outside the academic context. We hope and believe that the code will catalyze a series of ongoing conversations about our principles and practices. Together, through engagement, we can create a consistent message and ethos in our classrooms, labs, departments, and throughout the academic enterprise, to ensure that the core values of academic integrity and honesty are being embraced by both students and faculty.

#### From Q&A about the Honor Code

#### Q: How will members of the campus community learn about the existence of the honor code?

A: Incoming undergraduate and graduate students beginning with Fall semester 2013 will indicate that they agree with the Honor Code when they accept an offer of admission to UC Berkeley. The Honor Code will be discussed in orientation sessions for new students and new faculty, and in training sessions for Graduate Student Instructors. Informational messages and pointers to resources (such as this website) will be distributed to the entire campus community.

### **Some Guides to Good Citation Practices:**

When Sources Must Be Cited (Checklist)

Penn State, Effective Technical Writing in the Information Age

https://www.e-education.psu.edu/styleforstudents/c5\_p5.html

Information that always must be cited—whether web-based or print-based—includes:

- Quotations, opinions, and predictions, whether directly quoted or paraphrased.
- Statistics derived by the original author.

- Visuals in the original.
- Another author's theories.
- Case studies.
- Another author's direct experimental methods or results.
- Another author's specialized research procedures or findings.

If you use specific information of the type just mentioned, document it; otherwise you could be plagiarizing. Better safe than lazy. By citing the source of your information you point to an authority rather than ask your reader to trust your memory or what might appear to be your own idea. Even though you can recall a statistic or a description of a process, for example, citation of such information—if it came directly from a source—gives more credibility to your writing and underscores the accuracy, timeliness, and even the potential bias of your information. In short, be honest, smart, and safe.

Bart Penders, Ten Simple Rules for Responsible Referencing, PLOS Computational Biology (April 12, 2018)

https://journals.plos.org/ploscompbiol/article?id=10.1371/journal.pcbi.1006036

- 1. Rule 1: Include relevant citations.
- 2. Rule 2: Read the publications you cite.
- 3. Rule 3: Cite in accordance with content.
- 4. Rule 4: Cite transparently, not neutrally.
- 5. Rule 5: **Cite** yourself when required.
- 6. Rule 6: Prioritise the **citations** you include.
- 7. Rule 7: Evaluate citations as the choices that they are.
- 8. Rule 8: Evaluate citations in their rhetorical context
- 9. Rule 9: Evaluation citations as framed communication
- 10. Rule 10: Accept that citation practices differ across boundaries