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About That Presidential Medal of Freedom: Revisiting the Nunes Memo

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President Trump last week awarded the Presidential Medal of Freedom to, of all people, Rep. Devin Nunes. Nunes is the ranking Republican member of the House Permanent Select Committee on Intelligence and among Congress's most prolific and consequential conspiracy theorists. In announcing the award on Jan. 4, the president declared that Nunes had “unearth[ed] the crime of the century,” referring to Nunes's investigations into alleged misconduct by the Obama administration during the 2016 election. As part of this investigation—the animating principle behind the award—the announcement reads, Nunes “learned that the Obama-Biden administration had issued Foreign Intelligence Surveillance Act (FISA) warrants to spy on President Trump's campaign and illegitimately unmasked several innocent spying victims for political gain.”

The award comes amid weeks and months of disputes over information, misinformation and disinformation. There was the controversy over the New York Post's publication of Hunter Biden's purported text messages, which had Americans arguing, again, about how news organizations should handle apparently hacked or stolen content, whether the material was authentic and whether it was the product of some kind of information effort. It saw the release by a pair of Senate committees of a report on Biden and Burisma that was informed by information from an apparent Russian agent and had observers rightly concerned about the abuse of congressional oversight authorities. It saw the continuous congressional efforts to investigate the investigators from 2016 and 2017 based on conspiracy theories about coups and treason, which raised serious questions about the deployment of complex mixtures of facts and nonsense to attack important American institutions. Since the election, it has seen a barrage of disinformation in court proceedings and presidential statements about supposed voter fraud, and the entire period has been awash in lies about the coronavirus and public health measures surrounding it.

All of which makes it a propitious moment to revisit the so-called “Nunes memo.”

The Nunes memo—and the subsequent response to it from Rep. Adam Schiff—may for many readers be lost in the mists of time. But way back in what feels like the Mesozoic Era, before the president was impeached, before George Floyd's name was universally recognized, before anyone knew what “COVID-19” was, it was a very big deal for a hot second. And it is one of the reasons Nunes was honored last week.

Back then, Washington's chief concern was whether Trump had “colluded” with a foreign actor to win an election—a matter with which Trump remains obsessed to this day. The Mueller investigation was underway. And Trump was already demonizing the investigation, arguing repeatedly that the FBI's leadership had it out for him and had spied on his campaign. This was the germ of what became, over time, a full-blown conspiracy theory that the FBI had tried to

prevent, and then tried to undo, Trump's election. And key to it, then as now, was the warrant sought from the Foreign Intelligence Surveillance Court (FISC) on former Trump campaign volunteer Carter Page.

The Nunes memo, which argued publicly that the Page warrant application was improper, was thus a key moment in the development of the myth that has since become a kind of article of faith among the president's defenders. As such, it represented a critical step in what became a sustained disinformation campaign—the step in which the then-chairman of the House Intelligence Committee declared publicly that the Russia investigation had not been on the up-and-up.

But the story of the Nunes and Schiff memos is complicated. Because while the Nunes memo was an early and pivotal part of a long-term disinformation effort in defense of the president at the expense of American governmental institutions, it turned out to contain no small amount of truth—at least if one believes the findings of the Justice Department's inspector general. And while the Schiff memo was designed to rebut Nunes's attacks on those institutions and counter the disinformation campaign, Schiff turned out to be wrong on critical points.

This does not mean, as the president's defenders have often crowed, that Nunes has been vindicated. Indeed, aspects of his memo—as we describe below—still seem in retrospect like intentional efforts to deceive the public about a central aspect of the Carter Page FISA application. This fact alone gravely undermines any effort to laud Nunes as a truth-teller.

It does show, however, that the relationship between truth and falsehood in disinformation can be complicated. Not all disinformation is composed entirely of lies. And not all efforts to rebut disinformation are built out of bricks composed entirely of truth.

What follows is a close examination of truth and falsehood, disinformation and counter-disinformation in the Nunes and Schiff memos. We intend it as a kind of case study—valuable not just for historical accountability with respect to Nunes and Schiff and those in the press (including one of the present authors) who sided with one or the other of them, but also as future-looking guidance for situations in which political actors are using complex fact-patterns involving nonpublic information to advance contested claims on high-stakes matters.

The reason the controversy over the Nunes memo offers a useful case study is that the matter on which Nunes reported has, since the controversy, been investigated exhaustively—so we can now see in some detail, line by line, how much Nunes and Schiff each got right and wrong. And we can see as well the nature of things each got right and wrong.

And the reality is complicated. The Nunes memo turns out to have been correct on important points, in addition to offering some blatant untruths. Yet the important points it makes are all in the service of a larger point on which it remains profoundly wrong and misleading. In other words, while subsequent inspector general findings sustained many of the specific facts Nunes asserted and showed a good number of others to be adjacent to the truth, its entire animating principle—that the FISA warrant was part of a politically motivated effort by the FBI to spy on Trump and take him down—remains as much disinformation as it ever was.

The converse is true of the Schiff memo. What seemed like a sober and serious response to Nunes at first turned out to be wrong on a lot of points. It also omits some context that proves significant. Nonetheless, on the biggest question—whether the warrants were, in fact, politically

motivated by an inappropriate ambition to get the president—Schiff is arguing (using a lot of bad facts) for what still turns out to be the truth.

A Bit of Background

For those who need a refresher on the facts, on Feb. 2, 2018, Nunes authored a memo asserting that the Page warrant was obtained under false pretenses and inaccurate information. On a strictly partisan basis, the House Intelligence Committee voted to release the Nunes memo. Days later, the committee also voted unanimously to release a memo that Schiff, then-ranking Democratic member of the committee, authored in response to rebut each of Nunes's claims.

Upon its publication, Nunes's memo was widely derided among pundits of all non-Trumpist stripes. Many critics argued that its logic was undermined by its own admissions. On a more legalistic level, Faiza Patel on Just Security outlined the fact that the memo missed the more fundamental point of what constitutes probable cause for a warrant. Some critics were more straightforward, calling it a “dud” for having failed to break real news. Former FBI Director James Comey tweeted, “That’s it?” and referred to the memo as “dishonest.” Even Republican Sen. Susan Collins cast doubt on the memo in a carefully worded statement, saying that a bipartisan memo subject to “careful vetting” would have been more appropriate. To that end, one of us wrote on Lawfare: “There are many reasons to doubt the memo’s factual integrity.”

The FBI itself attacked the memo too. It released a statement saying the bureau was “provided a limited opportunity to review this memo the day before the committee voted to release it” and that it “ha[s] grave concerns about material omissions of fact that fundamentally impact the memo’s accuracy.” There was also concern about the committee’s decision to release the memo: The Justice Department’s congressional liaison reportedly told Nunes that publicly releasing the memo would be “extraordinarily reckless.”

By contrast, upon its subsequent release, the Schiff memo was widely embraced as having effectively disputed Nunes's claims. For example, Vox ran the headline “The Democratic rebuttal to the Nunes memo tears it apart.” Julian Sanchez of the Cato Institute responded to Schiff's rebuttal as follows: “This is a pretty thorough demolition of Nunes’ insinuations of impropriety by FBI/DOJ, which were pretty weak as it stands.” And, again, one of us wrote the following at the time of the release: “[T]he [Schiff memo] thus raises serious questions ... about whether Chairman Nunes and his colleagues are acting in good faith.”

Then, about a year ago, Justice Department Inspector General Michael Horowitz issued his subsequent report on the Crossfire Hurricane investigation in December 2019. And in important respects, Horowitz validated aspects of the Nunes memo and contradicted Schiff.

This led a number of commentators to claim vindication on Nunes's behalf. The Federalist wrote that the Horowitz report “vindicates the Nunes memo while showing that the Schiff memo was riddled with lies and false statements.” The Wall Street Journal's editorial board similarly claimed Nunes's vindication, while the Washington Times's editorial board demanding, “Devin Nunes is owed an apology.” Indeed, claims of vindication were issued not just by conservative commentators; the Washington Post, for example, asserted that the inspector general's report, to some extent, substantiated the Nunes memo.

A year has now passed. And while tempers have not cooled on the matter of the Steele dossier, a certain degree of quasi-consensus has developed. Nobody today is defending the FBI's appalling

handling of the Carter Page FISA applications, which involved serial errors and misstatements and has triggered a wider-ranging inspector general investigation of the bureau's handling of FISA materials, reform by the bureau and scrutiny by the FISC itself. And while the president's defenders still insist that the errors in question were part of a wider, political conspiracy against Trump, this argument has not caught on beyond those most committed to the president's cause. There simply isn't evidence that it's true.

In a polarized politics in which one political camp insists on living in its own factual universe, moreover, such complex interplays of fact, error and lie as took place in this case seem likely to be a recurrent feature of our political environment. As such, going back over the Nunes and Schiff memos in some detail in light of what we have since learned seems like a useful exercise.

The Nunes and Schiff Memos

The Nunes memo is short, totaling less than four full pages. It was actually sent by "HPSCI Majority Staff" and was drafted in large part by Kash Patel, then-senior adviser to Nunes, later a top aide to then-Acting Director of Intelligence Richard Grenell and currently the chief of staff at the Defense Department. It concludes that "material and relevant information was omitted" from Page's initial and supplemental FISA applications. Nunes was certainly right about that, according to the facts and determinations made by the inspector general; the report itself states that the inspector general "identified significant inaccuracies and omissions in each of the four applications—7 in the first FISA application and a total of 17 by the final renewal application."

To arrive at that conclusion, the Nunes memo rests on the following assertions (rearranged here and organized more discretely):

- Christopher Steele—a former British spy and author of the infamous "dossier" that powered much of the government's request to surveil Page—has no credibility because of his media interviews and his anti-Trump bias and because the dossier was funded by Trump's political enemies.
- The FISA application improperly relied on a news article that was sourced to Steele, which therefore could not corroborate information that was also provided by Steele.
- No FISA application would have been sought absent the dossier.
- The FISA application mentions former Trump campaign aide George Papadopoulos, despite the fact that there is "no evidence of any cooperation or conspiracy between Page and Papadopoulos." Nonetheless, the Papadopoulos information referenced triggered a separate counterintelligence investigation led by biased individuals, which similarly undermines its credibility and persuasive value.

The Schiff memo, by contrast, identified three overarching ideas on which it aimed to "correct the record":

- Steele's intelligence did not inform the FBI's decision to initiate the counterintelligence investigation.
- The FISA application was sufficiently detailed in its rationale for surveillance and provided multiple sources for suspicion against Page, not just the Steele material.

- The Nunes memo, it contended, “draws selectively” on pertinent facts and “includes other distortions and misrepresentations that are contradicted by the underlying classified documents.”

A number of atmospheric points added to the apparent credibility of the Schiff memo. Schiff, ever the prosecutor, cited each of his assertions, including using quotations; this contrasted with the Nunes memo, which argued more by assertion. Schiff’s memo was also more substantial. Length, of course, is not indicative of accuracy, but with a detailed, complex and nuanced story like that of the Page FISA applications, Schiff’s willingness to explain himself in detail probably enhanced his memo’s air of credibility. Put simply, the work seemed more professional, and it was elaborated better.

What Nunes Got Right and Wrong

The problem is that being more professional is not the same thing as being right. And the inspector general report makes clear that Schiff got some things wrong—and Nunes got some things right.

First and foremost, Nunes’s instinct that the Carter Page FISA applications were, in fact, deficient, is well borne out by the subsequent record. The inspector general report finds that the Page FISA applications cumulatively contained 17 material errors or omissions. This is a very big deal, and Nunes’s memo in retrospect is the first major indication that someone smelled a rat. Whatever one thinks of Nunes, that’s not nothing.

In that regard more specifically, the FBI did indeed have concerns about Steele’s potential political bias and the accuracy of his information, much of which it never validated. An entire subsection of the inspector general’s report is entitled “Initial Feedback and NSD Concerns over Steele’s Potential Motivation and Bias.” The inspector general found, though text messages suggested otherwise, that the investigative team may not have initially informed the National Security Division of the Justice Department “about the potential or suspected political connections to Steele’s reporting” until the day the FBI drafted the initial FISA warrant and that “nothing to that effect appeared in the October 11 draft FISA application.”

The trouble for Nunes is that his in-retrospect perceptive insight that the Page FISA was overly reliant on potentially unreliable information from Steele—an insight that required the inspector general’s investigation to validate—came immediately alongside a second claim that was far easier to check and was a flat misrepresentation. The Nunes memo claims that the FBI did not “disclose or reference the role of the DNC, Clinton campaign, or any party/campaign in funding Steele’s efforts, even though the political origins of the Steele dossier were then known to senior DOJ and FBI officials.”

In fact, the application contained a lengthy footnote that made the political context clear, albeit without naming U.S. persons explicitly. This gross mischaracterization, upon which the Schiff memo rightly seized, did much to discredit the Nunes memo and draw attention away from what turned out to be its early warning about one of the key deficiencies of the FBI’s handling of the Page applications. Nor does it save the Nunes memo on this point that the inspector general ultimately criticized the FBI for not giving the court more information about Steele’s political connections as it became available. The Nunes memo is simply deceptive on this point—and pretty clearly intentionally so, given the text of the FISA application itself.

Nunes also leaves out an important fact: that FBI personnel treated the entirety of Steele's reporting with a healthy skepticism precisely because the information—as the inspector general later characterized the bureau's concerns—could be “inaccurate,” “false,” “embellished,” “exaggerated” or “provided by the Russians as part of a disinformation campaign.” What's more, while the bureau's concerns about Steele were raised at the 11th hour, they were raised nonetheless. That they were not disseminated adequately within the Justice Department signified not some political conspiracy, the inspector general found, but a failure of communication.

This section offers a particularly vivid example of our broad point. Nunes got something big right here: As the inspector general found, the Justice Department over-relied on Steele's information in the narrow context of the Page FISA applications and did not adequately describe reasons to disbelieve him or his reporting. Yet he did so in a context that came perilously close to simply lying about the FBI's degree of disclosure to the court.

Consider also the Nunes memo's focus on then-Associate Deputy Attorney General Bruce Ohr, who shared a long-standing professional relationship with Steele. Ohr's wife, moreover, was a Russia expert who was working for Fusion GPS—the investigative firm that contracted with Steele. Nunes peppers the two paragraphs he devotes to Ohr with facts: Ohr did work for Deputy Attorneys General Sally Yates and Rod Rosenstein; his wife did work for Fusion GPS; Steele did tell Ohr he was “desperate that Donald Trump not get elected and was passionate about him not being the U.S. President”; and the Ohr's relationship to Steele was not in fact disclosed to the FISC in the warrant application. Schiff, meanwhile, describes this collection of facts as “overstat[ing] the significance of [Ohr's] interactions with Steele, and mislead[ing] about the timeframe of Ohr's communication with the FBI.”

The Ohr story too matches our overall theme: Nunes's facts are accurate, but they don't amount to the point he appears to be trying to make with them. To Schiff's point, he omits relevant context and gratuitously marshals references to known players such as Yates and Rosenstein all in service of muddying the waters and suggesting that Ohr's involvement was part of some kind of plot to mislead the court.

Conversely, Schiff's minimization of Ohr's role is contradicted by the inspector general's report, which details how Ohr met with the members of the Page investigative team 13 times over a few months and concludes that “Ohr committed consequential errors in judgment.”

Yet again, the inspector general does not find what Nunes is clearly driving at: that Ohr's efforts were part of some conspiracy to abuse the FISA process and spy on the president's campaign using bogus information—much less that either Yates or Rosenstein was involved. Writes Nunes, “clear evidence of Steele's bias was recorded by Ohr at the time and subsequently in official FBI files—but not reflected in any of the Page FISA applications The Ohr's relationship with Steele and Fusion GPS was inexplicably concealed from the FISC.” Rather, what the inspector general ultimately found about Ohr is, as the above-quoted language suggests, that he made errors in judgment in not informing his superiors about his activities and that information he gave the FBI about Steele should have been included in the FISA renewal applications. The inspector general does not find that Ohr's activities caused misleading or false information to be presented to the court; in fact, to the contrary, the inspector general found that as a result of Ohr's behavior, the FBI has *more* information about Steele that it should have reported to the court.

As part of its larger fixation on insisting that the FBI misled the court about Steele's being a political operative, the Nunes memo also emphasizes the financial backing for Steele's work. "Steele was a longtime FBI source who was paid over \$160,000 by the DNC and Clinton campaign, via the law firm Perkins Coie and research firm Fusion GPS, to obtain derogatory information on Donald Trump's ties to Russia." These facts are basically right: The inspector general confirms that Steele was an FBI source from 2013 to 2016 and also concludes that Steele had been paid for his information.

The implication of Nunes's claim, however—that these important details were withheld from the court—is only partially true. Steele claimed to have informed his handling agent at the FBI, according to the inspector general, that he was aware "that 'Democratic Party associates' were paying for Fusion GPS's research, the 'ultimate client' was the leadership of the Clinton presidential campaign, and 'the candidate' was aware of Steele's reporting."

The Nunes memo states: "The initial FISA application notes Steele was working for a named U.S. person, but does not name Fusion GPS and principal Glenn Simpson, who was paid by a U.S. law firm (Perkins Coie) representing the DNC (even though it was known by DOJ at the time that political actor were involved with the Steele dossier)." This is accurate—sort of: The FISA application does not state the political affiliation of the entities that commissioned the work, though it says clearly that "[t]he FBI speculates that the identified U.S. person was likely looking for information could be used to discredit [Trump's] campaign." And the inspector general does criticize the bureau, as noted above, for failing "to update the description of Steele after information became known to the Crossfire Hurricane team, from Ohr and others, that provided greater clarity on the political origins and connections of Steele's reporting, including that Simpson was hired by someone associated with the Democratic Party and/or the DNC."

But here it is quite clear that these omissions were not part of any kind of effort to withhold the truth from the court. Notes taken by an agent at the time state that the "law firm [paying for Steele's research] works for the Republican party or Hillary and will use [the information] at some point." Notably, when this meeting took place on July 13, 2016, Trump was not yet the Republican nominee, having won the nomination on July 19, 2016. Moreover, one of the case agents told the inspector general that "Steele did not disclose information about the identity of Fusion GPS's client, a law firm which was funding Steele's work due to a confidentiality agreement that prevented him from sharing that information." Steele's notes from that very meeting with the case agent state "that the FBI did not press him to identify Fusion GPS's client." Indeed, Steele could not specifically recall ever informing the FBI of the law firm's name and only thought it "probabl[e]" he had told them. The FBI had sketchy information about the political nature of Steele's funding, and it described that information in general terms. The FBI can be faulted, as the inspector general faults it, for not updating the court as information later became available. But this point simply will not bear the weight Nunes is trying to put on it.

In other words, once again, the inspector general documents serious errors and validates some of the facts in the Nunes memo, but in a fashion that contradicts the larger intended meaning of the Nunes memo. Yes, the name of the law firm and the Hillary Clinton campaign were not in the fateful footnote, but not because the FBI was trying to hoodwink the court.

Nunes has a stronger claim to simple vindication on the matter of the FBI's use of the Yahoo News article. Nunes writes: "The Carter Page FISA application also cited extensively a September 23, 2016, Yahoo News article by Michael Isikoff, which focuses on Page's July 2016

trip to Moscow. This article does not corroborate the Steele dossier because it is derived from information leaked by Steele himself to Yahoo News” (emphasis in original). As a factual matter here, Nunes is correct. Steele turns out to have been the source for the article restating his own material in the application. The only wrinkle here is that it is less than clear from the redacted application that the Justice Department was suggesting that Yahoo News was an independent reason to believe the information in question. A footnote reads in part that “[t]he FBI does not believe that [Steele] directly provided this information to the press” and suggests that it might have found its way to Yahoo News from elsewhere in the chain of entities that employed him.

Nonetheless, the inspector general reports that Steele likely wasn’t asked about whether he was the source:

Case Agent 2 told the [Office of the Inspector General] that he could not remember asking Steele about the Yahoo News article during the meeting, and that he was more focused on getting Steele to “play ball.” The Supervisory Intel Analyst also said he did not recall Steele being asked whether he was a source of the Yahoo News article. Handling Agent 1 stated that he could not recall if the article was raised during the meeting with Steele.

According to Steele, he did not recall any discussion of the media during the early October meeting, and none was reflected in his notes. Steele further told us that if the issue of the media had been raised he would have recorded it in his notes given that he already had met with media groups in September.

Relatedly, the Nunes memo is correct in saying that “Steele should have been terminated for his previous undisclosed contacts with Yahoo.” The inspector general found that:

Handling Agent 1 told us that he understood why Steele would believe in September 2016 that he did not have an obligation to discuss his press contacts with him given that: (1) Steele’s work resulted from a private client engagement; and (2) Handling Agent 1 told Steele on July 5 that he was not collecting his election reporting on behalf of the FBI. However, Handling Agent 1’s view was that while it was obvious that Fusion GPS would want to publicize Steele’s election information, it was not apparent that Steele would be conducting press briefings and otherwise interjecting himself into the media spotlight. Handling Agent 1 told us that he would have recommended that Steele be closed in September 2016 if he had known about the attention that Steele was attracting to himself.

Nunes also has a plausible case that the Steele material was ultimately pivotal to the FBI’s decision to seek a FISA warrant at all. In his fourth substantive paragraph, Nunes cites several data points to imply that no FISA application would have been sought at all but for Steele. Specifically, the memo notes: “Deputy Director [Andrew] McCabe testified before the Committee in December 2017 that no surveillance warrant would have been sought from the FISC without the Steele dossier information.”

The inspector general later concluded that the Steele material was, in fact, an “essential” part of the application:

[T]he Crossfire Hurricane team’s receipt of Steele’s election reporting on September 19, 2016 played a central and essential role in the FBI’s and Department’s decision to seek the FISA order. As noted above, when the team first sought to pursue a FISA order for Page in August 2016, a decision was made by [the Office of General Counsel (OGC)], [the Department of

Justice], or both that more information was needed to support a probable cause finding that Page was an agent of a foreign power. As a result, FBI OGC ceased discussions with or about a Page FISA order at that time.

In essence, the inspector general concludes that, while the dossier may have been a crucial element, it was not alone sufficient; other intelligence gave rise to the investigation and played a role as well, but the Steele material did seem to put the matter over the top.

The Really Big Thing Nunes Got Wrong

The specific text of the memo, in short, got some stuff right. It got some stuff wrong. And it contained no small measure of false innuendo.

What makes the story of the Nunes memo so interesting, however, is not just how it operated at the specific textual level. The purpose of the memo, after all, was not to vindicate Carter Page from the iniquity of probable cause of being an agent of the Russian Federation. The animating principle behind Nunes's memo, rather, as the New York Times succinctly observed:

has everything to do with defending President Trump from Mr. Mueller's investigation Mr. Trump's allies in recent weeks have increasingly sought to shift the focus away from Russian election interference and instead portray the actions of investigators as the real scandal.

By casting doubt on the FISA process itself, Nunes "launched a counteroffensive aimed at derailing or discrediting the federal inquiry that ... shadowed Trump's first year in office."

Nunes's counterassault to discredit the Justice Department began a year before he wrote the specific memo: In 2017, Nunes, while in a car with a staffer in the evening, took a phone call, abruptly exited the car and took an impromptu trip to the White House to discuss the Obama administration's incidental collection on the Trump transition team, and subsequently held a press conference on the matter decrying the "unmasking" actions.

In other words, even to the extent it turns out to contain true—and actually prescient—facts, the Nunes memo has to be read in terms of the totality of the campaign of which it was part. It was a campaign to discredit the entirety of the Russia investigation, from how it began to how it progressed to the indictments it issued. And the basic thesis of this campaign was and remains entirely false.

The inspector general's report is clear on this point as well. The inspector general "did not find documentary or testimonial evidence that political bias or improper motivation influenced the decisions to open the four individual investigations" that made up the FBI's Crossfire Hurricane, nor is there any serious suggestion of misconduct in the way it progresses outside of the narrow confines of the Carter Page FISA applications. In other words, Nunes managed to muster what turn out to be a lot of true facts—compelling in their own right and damning as to the handling of an important matter—in support of a false thesis.

Indeed, the use by prominent Republicans of the Carter Page FISA and inclusion of the Steele material maximized the narrative value of a point that, in the grand scheme of things, was really quite small. The integrity of the FISA process is, of course, not a small matter at all, but Steele's information about Page was by no means the totality, or even the majority, of the material the FBI developed about Page. And the Page investigation itself—and Steele's information within it—represented only a tiny sliver of what made up the larger Crossfire Hurricane investigation. It

plays a vanishingly small role in the Mueller report. And Steele had nothing to do with the investigations of George Papadopoulos or Michael Flynn, and little to do with the criminal aspects of the Paul Manafort case. His information played no role at all in the reporting on the Internet Research Agency or its social media manipulations. Nunes was savvy enough to take a muddy area where the FBI's failures were significant and leverage that into a picture of the entire Crossfire Hurricane investigation. And while he managed to do that to great effect, the overall thesis remains false.

All of which carries two important lessons as we think about disinformation and its components in the future. The first is that not every disinformation campaign is composed of false facts. The fact, for example, that the release of disparaging information about Hunter Biden may have taken place as part of an information campaign does not mean that the specific information released is false. In the case of the Nunes memo, a lot of people, including one of the present authors, would have done better to more carefully separate the integrity of the memo's author from the integrity of the information his memo purported to contain.

The second key point, the flip side of the first, is that a bunch of facts does not necessarily make up a compelling case. Because at the end of the day, the Nunes memo did not discredit the Russia investigation—nor did the inspector general's report. At most, they discredited one specific investigative technique the FBI employed in the course of looking at one thread of the Russia issues raised by the Trump campaign. It is possible to be 90 percent right and 100 percent wrong. Nunes was something less than 90 percent right, but he was certainly 100 percent wrong.

Trump's announcement concerning Nunes's Presidential Medal of Freedom concludes:

Congressman Nunes pursued the Russia Hoax at great personal risk and never stopped standing up for the truth. He had the fortitude to take on the media, the FBI, the Intelligence Community, the Democrat Party, foreign spies, and the full power of the Deep State Congressman Devin Nunes is a public servant of unmatched talent, unassailable integrity, and unwavering resolve. He uncovered the greatest scandal in American history.

This is the narrative in service of which Nunes wrote his famous memo—a narrative in which he stood courageous against a plot to get the president. Yes, there is truth in the memo. But it was all in the service of this falsehood.