ARTICLES

YkNNCOGVVG"NCY"TGXKGY"

OCMKPI"CRRNGUCWEG<"TGHNGEVKQPU"QP"CRRNGøU"KRJQPG"ECUG"

JQPQTCDNG"Rcwn"L0"Fg"Owpk\,"
FkUVKPIWKUJGF"Lwtkuv"kp"Tgukfgpeg."YkNNCOGVVG"Wpkxgtukv{"
EqnnÖgig"qh"Ncy"

Editor's Note: . _ , , ' ·   . ᵎ   ᶤ ᶤ   ᵎᵎ ,
  ᵎᵎ L   ', A '   .   F , , 26, 2016,
   ᵎ ,   P,   D ᶤ , ᶤ L . Iᶤ . , , ,
  ᵎ , ᶤ , . A ᶤ ᶼ ᶤ . ᶤ FBI   ᵎ ᶤ   P ᵎ . _
  ᶤ , ,   , , , ᶤ [3] ᶤ ᶤ ᵎ ᶤ , ᶼ ᶤ ᵎ . ᶤ ,
 ᶤ   , ,   , ᶤ . ᶼ ᵎ ᵎ ᵎ ᶤ ,
 , ᶤᶼ   ᶤ .

* ᶤ , ᶜ J . ᶤ ᶤ , ᶼ ,, ᶜ , ᶤ"
   30 Gnngp"Pcmcujkoc."

596"   *ILLAME E LA   E IE* "   ]74‹595"

XₖKK0 ̇ ̇ Ku"Rwdnke"Rgtegrvkqp"c"HcevqtA"00000000000000000000000000000000000000000000000000'5:3 ̇
XₖKKK0 ̇ Enqukpi"000000000000000000000000000000000000000000000000000000000000000000000000'5:4 ̇
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Ꝁ0""ꝀPVTQFWEVꝀQP"

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4238_"   *MAKING APPLE A CE*"   599"

ocuucetg ô dgeqog" uwdlgev" vq" c" hgfgtcn" eqwtv" qtfgtA" Vq" cpuygt" vjcv" swguvkqp." ygøxg" iqv" vq" iq" dcem" rcuv" vjg" kRjqpg." Crrng." cpf" Uvgxg" Lqdu="ygøxg"iqv"vq"iq"dcem"449"{gctu"vq"vjg"Cnn"Ytkvu"Cev"qh"39:;0"

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Vjg" Cnn" Ytkvu" Cev" qh" 39:;" ku" tghtgujkpin{" dtkgh" dwv" dtqcf." rtqxkfkpi"vjcv<"

*c+"Vjg"Uwrtgog"Eqwtv"cpf"cnn"eqwtvu"guvcdnkujgf"
d{"Cev"qh"Eqpitguu"

59:"   *ILLAME E LA   E IE *   ]74‹595"

Vjg" vgnrjqpg" eqorcp{" oqxgf" vq" xcecvg" vjg" eqwtvøu" qtfgt." dwv" vjg" eqwtv" cpuygtgf" vjcv" kv" jcf" cwvjqtkv{" vq" kuuwg" vjg" qtfgt" wpfgt" vjg" Cnn" Ytkvu" Cev0³;"

Vjg" Uwrtgog" Eqwtv" citggf" ykvj" vjg" fkuvtkev" eqwtv0⁴² Vjg" Uwrtgog" Eqwtv" qdugtxgf" vjcv" vjg" Cnn" Ytkvu" Cev" rgroku" c" eqwtv" vq" wug" kvu" lwfiogpv" vq" õcejkgxg" vjg" tcvkqpcn" gpfu" qh" vjg" ncy0ö⁴³ Vjg" Eqwtv" jgnf" kp" vjcv" ecug" vjcv꞉

> vjg" rqygt" eqphgttgf" d{" vjg"]Cnn" Ytkvu_" Cev"
> gzvgpfu." wpfgt" crrtqrtkcvg" ektewouvcpeg." vq" rgtuqpu"
> yjq." vjqwij" pqv" rctvkgu" vq" vjg" qtkikpcn" cevkqp" qt"
> gpicigf" kp" ytqpifqkpi." ctg" kp" c" rqukvkqp" vq" htwuvtcvg"
> vjg" korngogpvcvkqp" qh" c" eqwtv" qtfgt" qt" vjg" rtqrgt"
> cfokpkuvtcvkqp" qh" lwuvkeg." cpf" gpeqorcuugu" gxgp" vjqug"
> yjq" jcxg" pqv" vcmgp" cp{" chhktocvkxg" cevkqp" vq" jkpfgt"
> lwuvkeg0⁴⁴

Uq." vjg" Cevøu" rqygt" gzvgpfu" vq" õrgtuqpu" yjq." vjqwij" pqv" rctvkgu" vq" vjg" qtkikpcn" cevkqp" qt" gpicigf" kp" ytqpifqkpi." ctg" kp" c" rqukvkqp" vq" htwuvtcvg" vjg" korngogpvcvkqp" qh" c" eqwtv" qtfgt" qt" vjg" rtqrgt" cfokpkuvtcvkqp" qh" lwuvkeg0ö⁴⁵

Pqy." vyq" vjkpiu" ctg" engct꞉ *3+" vjg" Cnn" Ytkvu" Cev" gpeqorcuugu" vjqug" yjq" jcxgpøv" vcmgp" cp{" chhktocvkxg" cevkqp" {gv." cpf" *4+" vjg" Cev" crrnkgu" vq" pqprctvkgu0" Jgtg." vjcv" ogcpu" Crrng0

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Vjg" Cnn" Ytkvu" Cev" ku" c" tgukfwcn" uqwteg" qh" cwvjqtkv{" hqt" eqwtvu0" Hqt" gzcorng." vjg" Uwrtgog" Eqwtv" gzrnckpgf" vjcv" wpfgt" vjg" Cev" eqwtvu" ecp" kuuwg" qtfgtu" vjcv" ctg" pqv" eqxgtgf" d{" c" tgiwnct" uvcvwvg0⁴⁶

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3;. *Id.* at 385."
42. *Id.* at 394."
43. *Id.* "*ekvkpi" Jcttku" x0" Pgnuqp." 5;6" W0U0" 4:8" *3;8;++0"
44. *Id.* "cv" 396" *kpvgtpcn" swqvcvkqp" qokvvgf+0"
45. *Id.*"
46. Rc0" Dwtgcw" qh" Eqtt0" x0" W0U0" Octujcnu" Ugtx0." 696" W0U0" 56." 65" *3;;7+0"
47. *Id.*"
48. *i . i* ," DCNNGPVKPGøU" NCY" FKEVKQPCT[" *5f" gf0" 3;+*cp" qtfgt" vq" crrgct" cpf" vguvkh{+0"

4238_"   *MAKING APPLE A   CE*"   59;"

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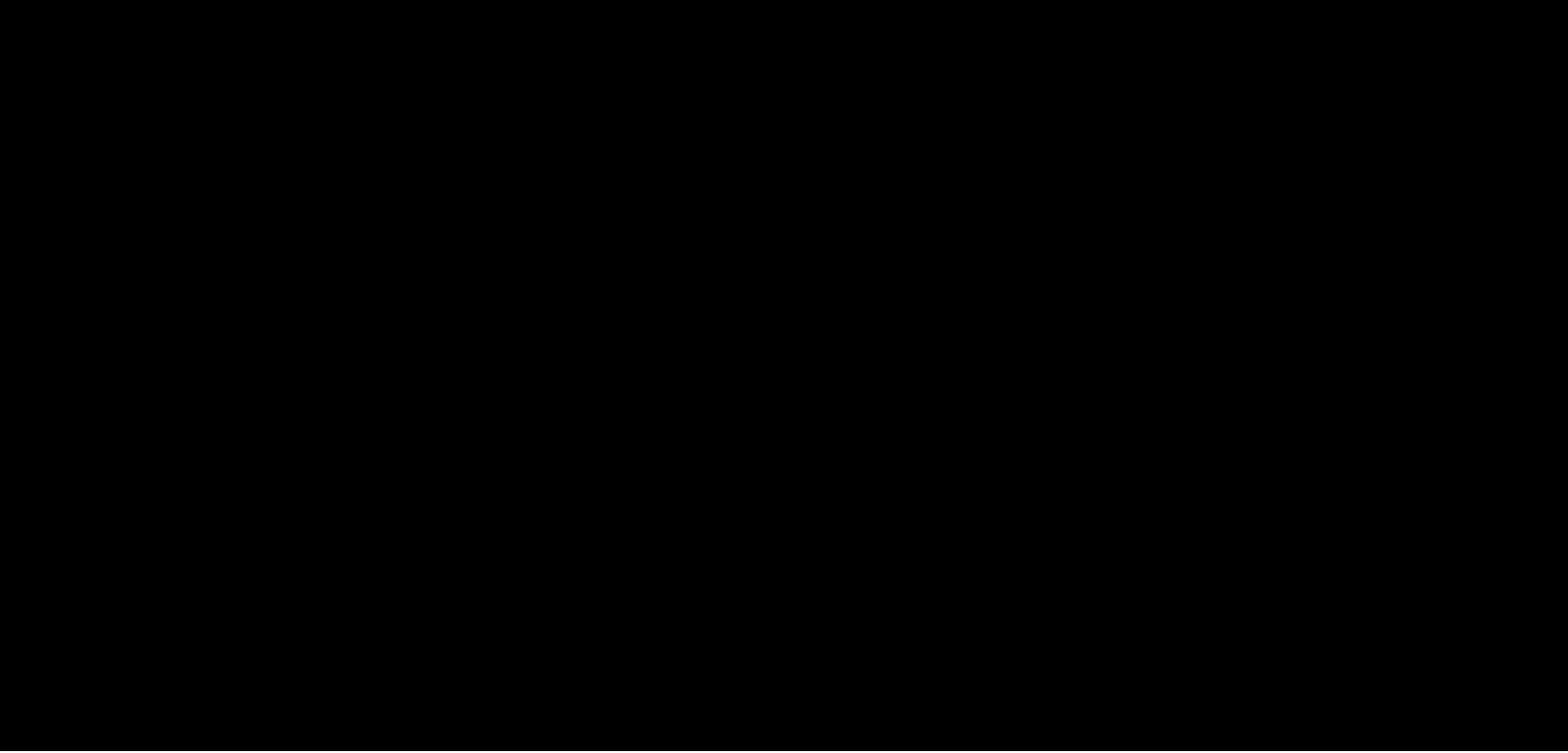
4238_"   *MAKING APPLE A CE"*   5:3"

qxgtugₙₙkpi" vjg" pgₗcvkxg" octmgvkpi" eqpegtpu0" Vjg" qtfgt" cevwcnn{" ngvu" Crrng" twp" vjg" rcuueqfg/dtgcmkpi" qrgtcvkqp" kvugnh" cv" kvu" qyp" hceknkvkgu ô vjg" HDₖ" yqwnf" tgₒqvgn{" ugpf" kp" rcuueqfgu" cpf" Crrng"

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vj g" Ucp" Dgtpct fkpq" uj qqvgtøu" nqemgf" ꞮRj qpg" y knn" nkmgn{" chhgev" c" ncr i g"
pw o dgt" qh" õtgi wnctö" r gq r ng0"

    Y j Ɪng" vj g" dcvvng" qxgt" r tgegfgpvu." qtfgtu. cpf" c r rgcnu" y knn" j c r rgp"
kp" eqwtvtqq o u." vj g" fgdcvg" qxgt" r tkxce{" cpf" vj g" fgdcvg" qxgt" gpet{ r vgf"
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uswctg0ö" Cntgcf{." y gøxg" uggp" cp" gpqt o qwu" c o qwpv" qh" o gfkc" eqxgtci g"
qp" vj ku" kuuwg0" Vk o " Eqqm." Crrngøu" Ej kgf" Gzgewvkxg" Qhhkegt." tgngcugf" c"
rwdnke" ngvvgt0⁵⁸" Vj g" c r rgcn" vq" vj g" rwdnke" fqgupøv" uvqr" vj gtg0" Lk o "
Eq o g{. "vj g"ugxgpvj "fktgevqt"qh"vj g"HDꞮ"cpf"c"hqt o gt"Fgrwv{"Cvvqtpg{"
I gpgtcn" kp" vj g" I gqti g" Y0" Dwuj " cf o kpkuvtcvkqp." y tqvg" c   c{" O