



BLUEBOOK RULE 18: CITATION TO INTERNET AND ELECTRONIC RESOURCES

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As a general rule, *The Bluebook* encourages citation to print sources when they are available. We all know, however, that the Internet contains lots of reliable legal source material, and pulling up an online database from the comfort of home is far easier than trekking to the library and wading through stacks of dusty books. Thankfully, *The Bluebook* recognizes this reality. It revamped Rule 18 and liberalized citation to non-print resources—now, any online source that shares the characteristics of a print source should be cited according to the rule for the print version.

This handout focuses on citation to internet and nonprint resources and will provide you with some guidance on when *The Bluebook* permits citation to a web-based source and how you should format that citation.¹ It focuses on the use of web-based sources in scholarly works. Consult the Blue Pages for information on citing to internet and electronic sources in practitioners' documents.

Citing Directly to the Internet

Essentially, *The Bluebook* creates three general formats for structuring an internet citation. These three general formats are (1) citations to the hard-copy print material, (2) citations that combine the print citation with the electronic citation, and (3) citations directly to the electronic version. *The Bluebook* now requires that all online content generated by authors be captured and stored in a permanent setting either through an archived URL or through citing to an archived PDF version on file.

Print Citation

Generally, if a print version of the source exists somewhere (even if the print version is not the material you are using), you should find and cite to the print version. Some internet sources, however, can be cited simply by using the citation format for the print version of the material. Consequently, you will not have to track down a hard copy of the print version for a proper cite. *The Bluebook* permits citation to the print version, even if the actual source you are using for your research is an electronic version, in three circumstances:

* Revised by Kelsey Handschuh in 2025, based on a revision by John Secaras, Richard Bernache and Halle Edwards.

¹ This handout does not address direct citation to commercial databases like Lexis and Westlaw materials, which have their own citation format under Rule 18.4.

1. Authenticated Documents (Rule 18.2.1(a)(i)): These are electronic documents that have a certificate or logo indicating that a government entity has verified that the electronic document is complete, unaltered, and comparable to the print version. When the website or internet document you are using has such a certificate or logo, you can simply cite it as if it were a hard copy print document. Below is an example of the authentication logo used by the Government Printing Office for electronic documents posted to its website, www.gpoaccess.gov²:

2. Official Versions (Rule 18.2.1(a)(ii)): Some states now provide that the online version of a particular document is the “official” document. *The Bluebook* prefers authenticated documents, but an official version published only online can still be cited as if it were print material if no authenticated version exists. Documents designated as official are considered, for citation purposes, to be proximate to the original version. So, for instance, documents that are published on government websites authored by government entities are considered official versions. Massachusetts, for example, only publishes some of its recent versions of documents online as this portion of its website demonstrates³:

You could cite to these documents, published “solely in electronic form,” as if they were print material.

3. Exact Copies (Rule 18.2.1(a)(iii)): Finally, if the material posted online is an exact copy of the print material, you could cite to that document as if it were a hard copy print source as it is treated similarly to an official version. A PDF of a law review article retrieved through HeinOnline or a PDF scan from Google Books would fall within this category.

Material from a commercial database (like Lexis or Westlaw) does not preserve the original pagination and other attributes of the printed material so such material cannot be cited using the normal print citation. Rather, it should be cited according to Rule 18.3 using the rules pertaining to commercial electronic databases.

Sources Including a URL

Electronic versions of sources will often be more readily accessible than print versions. While a print version remains the preferred option, any online source that shares the characteristics of a print source can be cited according to the rule for the print version with the URL appended to the

² You can view a full explanation of the GPO’s policies regarding authenticated electronic documents at www.gpoaccess.gov/authentication/faq.html

³ <http://www.mass.gov/?pageID=afsubtopic&L=5&L0=Home&L1=Research+%26+Technology&L2=Government+Data+%26+Documents&L3=State+Documents+%26+Resources&L4=State+Documents+Online&sid=Eoaf>

end of the citation as well as the archival preservation of the source under Rule 18.2.1(d). In the citation below, the substantive print citation is shown in red, while the appended electronic citation is blue:

Kashmir Hill & Jennifer Valentino-DeVries, *What OpenAI Did When ChatGPT Users Lost Touch With Reality*, N.Y. Times, Nov. 23, 2025, at BU6, <https://www.nytimes.com/2025/11/30/magazine/e-bikes-accidents-safety-legislation-california.html> [<https://perma.cc/6526-SDGZ>].

A few comments about the structural form of this citation: First, note that only a comma follows the full print citation. Second, note that your computer will likely create a hyperlink automatically when you type the URL in the electronic citation, turning the words royal blue and underlining them. This hyperlink is not the proper format for citation to the electronic version under Bluebook rules (see Rules 2 & 18.2.2(d)), so you should make sure to eliminate the hyperlink created when you type in the web address. In Microsoft Word, you can do this by right-clicking on the hyperlink and choosing “Remove Hyperlink” from the menu that pops up. Third, make sure to append the archive URL to the full source in brackets. Check with your institution to see if they have a preferred, free, or paid-for archival tool for sources.

Electronic Citations

The Bluebook considers all web-based sources to be direct. In other words, if you find an internet source that does not fit the citation format of any other Bluebook rule, you can cite the electronic source directly. Be sure to provide the most stable and most easily accessible version of the cited source—this means including any author, title, pagination, and date information as they appear in the electronic source. You can cite directly to the electronic version by adding the URL and its archival preservation in accordance with Rule 18.2.1(d) directly to the end of the citation. (As discussed above, be careful to remove the hyperlink that your computer might automatically generate.) Again, the substantive citation is in red, the electronic citation is blue:

Richard A. Webster & Bobbi-Jeanne Misick, *Louisiana Made It Nearly Impossible to Get Parole. Now It's Releasing Prisoners to Deport Them.*, PROPUBLICA (Nov. 24, 2025, at 05:00 ET), <https://www.propublica.org/article/louisiana-parole-deportation-jeff-landry-operation-geaux> [<https://perma.cc/Q7BU-QP95>].

Summary

This flow chart summarizes the information above and can help guide you in determining whether or not to cite directly to an electronic source:

Source-Specific Formatting: Web Page Citations

Now that you have a general understanding of the different structural formats for citing to electronic sources, we can dive into the different components of a website citation. Occasionally, material will be published on the web in both an HTML version and a PDF version. When this occurs, cite to the PDF version using the citation structure described above.

A citation to an internet web page generally contains the following information:

- (1) the author of the relevant object,
- (2) the title of the webpage or web-object,
- (3) the title of the website, website subdivision, or descriptive title,
- (4) the date and time, and
- (5) the URL.
- (6) the archival preservation.

Internet pages, unfortunately, come in a wide array of formats and styles. As a consequence, some of these components might not be present on the page you are citing. The following examples provide more details about each component of the citation.

1. Author of the Relevant Object (Rule 18.2.2(a))

If the webpage denotes an author, list the author's name in ordinary type:

Eric Posner, *More on Section 7 of the Torture Convention*, VOLOKH CONSPIRACY (Jan. 29, 2009, at 10:04), <http://www.volokh.com/2009/01/29/more-on-section-7-of-the-torture-convention> [<https://perma.cc/3KEJ-ZDRU>].

If the web page has no named author, but the website has a clear institutional owner, use the name of the institutional owner in the spot for the author's name (Example 1) unless the institutional owner is clear from the title of the website (Example 2). When the website lacks a named author or clear institutional author, omit the author section completely:

Example 1: KRISPY KREME, <https://www.krispykreme.com/> [<https://perma.cc/Z5HU-HSA8>] (last visited Dec. 1, 2025).

Example 2: Davis Family Butterfly Vivarium, AM MUSEUM OF NAT. HIST., http://www.amnh.org/exhibitions/butterflies/?src=h_h [<https://perma.cc/A85V-Y9Y9>] (last visited Dec. 1, 2025).

When citing to a specific comment or posting, start with the word “comment” followed by the commentator's name or username. Include a parenthetical containing the date and time of the comment if possible and then the word “on” in italics introducing the rest of the citation to the webpage rather than the author of the original piece:

Comment, Fancher Gotesky (June 5, 2024, at 12:04 ET), *on* Clellan Coe, Camouflage, AM. SCHOLAR (June 5, 2024), <https://theamericanscholar.org/camouflage-2/> [<https://perma.cc/P666-WN66>].

2. Title of Web Page (Rule 18.2.2(b))

The citation should also include the title of the specific page to which you are citing. You can find the title in the title bar of your web-browser or from a clearly announced heading on the page. Italicize this title, and capitalize it according to Rule 8 (regardless of how the web page or title bar capitalize the title):

Eric Posner, *More on Section 7 of the Torture Convention*, VOLOKH CONSPIRACY (Jan. 29, 2009, at 10:04), <http://www.volokh.com/2009/01/29/more-on-section-7-of-the-torture-convention> [<https://perma.cc/3KEJ-ZDRU>].

When the web page does not have a clear title, you can use a descriptive title. Descriptive titles should not be italicized:

Reviews of “Stranger Things,” IMDB, https://www.imdb.com/title/tt4574334/reviews/?ref_=tt_ururv_genai_sm [<https://perma.cc/ZW9Z-HLK3>] (last visited Dec. 6, 2025).

3. Title of the Website (Rule 18.2.2(b)(i))

Following the title of the specific page to which you are citing, you should indicate the title of the main website. This title should be listed in small caps and abbreviated per tables T6, T10, and T13. Capitalize the title of the website as it appears on the site:

Katie Buehler, *High Court To Review Trump’s Birthright Order*, LAW360 (Dec. 5, 2025, at 14:22 ET) <https://www.law360.com/articles/2414224> [<https://perma.cc/DP4R-TCTS>].

When a web source is published as a distinct subdivision of a larger site, like a blog or other similar type of subdivision, include both the main site and subdivision titles in the citation. There should be a colon before the subdivision title, and capitalize both according to Rule 8, even if the title bar uses nonstandard capitalization.

Ella Wiley, *Unraveling the Many Costs of Discriminatory Redistricting*, LEGAL DEF. FUND: BLOG (Oct. 30, 2023), <https://www.naacpldf.org/the-cost-of-discriminatory-redistricting/> [<https://perma.cc/SL7D-Y58H>].⁺

⁺ Example taken from *The Bluebook: A Uniform System of Citation* R.18.2.2, at 188 (Columbia L. Rev. Ass’n et al. eds, 22d ed. 2025).

4. Date and Time (Rule 18.2.2(c))

Provide the date as it appears on the internet site, using only dates that refer to the material cited. Put the date after the main page title and any pinpoint citation. *The Bluebook* recommends including a timestamp in twenty-four-hour formatting with a time zone designation whenever possible. If no time zone is provided, use the time zone of the device accessing the source. Abbreviate the date using Table T12:

Katie Buehler, *High Court To Review Trump’s Birthright Order*, LAW360 (Dec. 5, 2025, at 14:22 ET) <https://www.law360.com/articles/2414224> [<https://perma.cc/DP4R-TCTS>].

For comments, blog postings, or other content that can be easily identified by the time of posting, include a timestamp with the date:

Comment, Fancher Gotesky (June 5, 2024, at 12:04 ET), on Clellan Coe, Camouflage, AM. SCHOLAR (June 5, 2024), <https://theamericanscholar.org/camouflage-2/> [<https://perma.cc/P666-WN66>].⁺

If the web page includes an updated or corrected date that was different from the online publication date, use that date in lieu of the original online publication date. *The Bluebook* does not require a citation to indicate “last modified” or “last updated.”

Louise Radnofsky, James Romoser & Elizabeth Findell, *Supreme Court to Allow Texas to Use New Congressional Map in Win for Republicans*, WALL STREET JOURNAL (Dec. 4, 2025, at 19:11 ET), https://www.wsj.com/politics/policy/supreme-court-to-allow-texas-to-use-new-congressional-map-in-win-for-republicans-6db7eb50?mod=law_more_article_pos1 [<https://perma.cc/WC8X-M83G>].

If the web page lacks any date, indicate the last time you visited the website in a parenthetical placed after the URL:

YAHOO!, <http://www.yahoo.com> [<https://perma.cc/94S2-LKJW>] (last visited Aug. 12, 2024).

5. The URL (Rule 18.2.2(d))

Always include the URL of the exact web page you visited after either the main website title or the date parenthetical. Generally, include the exact URL that you used to access the website. If there is a shortlink that clearly indicates the source site (like wapo.st or imdb.to) then use the shortlink, but do not use a non-descriptive shortlink such as bit.ly. *The Bluebook* allows you to cite the root URL (as opposed to the full URL) when:

⁺ Example taken from *The Bluebook: A Uniform System of Citation* R.18.2.2, at 189 (Columbia L. Rev. Ass’n et al. eds, 22d ed. 2025).

- The URL is long, unwieldy, or full of nontextual characters; or
- The source can only be obtained by submitting a form or query.

When you do not cite the full URL, include a parenthetical that explains how to navigate to the specific web page to which you are citing:

http://fjsrc.urgan.org/nofram/wqs/q_data_1.html#2001 (follow “2001: AOUSC out” hyperlink; then follow “Offenses: TTSECMO” hyperlink).

Remember that your computer might automatically generate a hyperlink in the document anytime you type an URL. If you notice your computer turning the hyperlink text blue and underlining it, you should remove this formatting, as it does not conform to *The Bluebook*.

6. Archival Preservation (Rule 18.2.1(d))

Internet sources can often move from their original URLs or locations on a webpage. In order to preserve the original location and formatting of your sources, *The Bluebook* requires archiving internet sources. Archiving can be achieved one of two ways:

1. By using a reliable archival tool, such as a Perma.cc.
2. By saving a web-based source in a fixed form, such as a PDF, and storing the PDF on file with an accessible source.

When using a reliable archival tool, simply append the archive URL (offset by brackets) to the full citation:

Rocio Gonzalez, *Puerto Rico’s Status Debate Continues as Island Marks 61 Years as a Commonwealth*, HUFFINGTON POST (July 25, 2013, 9:00 ET), http://www.huffingtonpost.com/2013/07/25/puerto-rico-status-debate_n_3651755.html [<http://perma.cc/C6UP-96HN>].

When saving a source on file with an accessible organization, indicate where the source may be found in a parenthetical following the URL:

Christine Chung & Derek M. Norman, *Airlines and Passengers Still Struggling, a Day After Global Outage*, N.Y. TIMES (July 20, 2024), <https://www.nytimes.com/2024/07/20/travel/outage-airlines-passengers-effects.html> (on file with the Columbia Law Review).⁺

AI-Generated Content (Rule 18.3)

⁺ Example taken from *The Bluebook: A Uniform System of Citation* R.18.2.1, at 187 (Columbia L. Rev. Ass’n et al. eds, 22d ed. 2025).

The Bluebook now requires authors to take a screenshot of AI-generated outputs, save it as a PDF, and store it on file. Citations to large language models such as ChatGPT or CoPilot should include the (1) author of the prompt, (2) name of the model, (3) exact text of the prompt submission in quotation marks, (4) the date the prompt was submitted, and (5) a parenthetical indicating where the PDF is stored.

Luke Cronin, Google Gemini Advanced, “Who would make a better Supreme Court Justice: Beyoncé or Taylor Swift?” (Mar. 29, 2024) (on file with the Columbia Law Review).⁺

For search results from a search engine, include the (1) name of the search engine in small capitals, (2) the exact text of the query including any Boolean operators used in quotation marks, (3) the number of search results if given, (4) the date the search was conducted, and (5) a parenthetical indicating where the PDF is stored. If filters were applied, list them in a parenthetical. For this rule, commas that were not part of the search should be kept outside of the quotation marks for maximum clarity.

BING, “The Bluebook”, 6,050,000 results (May 22, 2024) (on file with the Harvard Law Review).⁺

WESTLAW, + “Disclosure Controls” + “SEC”, 1 result (Mar. 30, 2024) (on file with the Yale Law Journal) (filtered by “Cases”, “2d Cir.”).⁺

Finally, when content has been generated by AI, it should be cited according to the relevant *Bluebook* subrule, but you should add a parenthetical indicating that the content has (1) been generated by AI and (2) what AI model generated the content. When the subrule requires the name of an author, substitute the name for the name of the individual who submitted the prompt to the AI if available or omit the author’s name if is unavailable.

Pablo Xavier, Photograph of Pope Leo in a Cubs Baseball Jacket, *in This is Not a Real Photo of the Pope in a Baseball Jacket*, SNOPE (Mar. 26, 2026), <https://www.snopes.com/fact-check/not-real-photo-pope-in-baseball-jacket/> [<https://perma.cc/3EN7-BP4P>] (generated by Midjourney AI).

Illustration of a Vortex on Mars (on file with the Georgetown Law Review) (generated by DALL-E 3).

⁺ Example taken from *The Bluebook: A Uniform System of Citation* R.18.3, at 191 (Columbia L. Rev. Ass’n et al. eds, 22d ed. 2025).

Social Media (Rule 18.10)

More and more often, you may need to cite to a social media post or platform. *The Bluebook* provides guidance for these online platforms used to communicate and share content in various forms.

1. Social Media Platforms (Rule 18.10.1).⁴

The structure of social media citations depends on the nature of the underlying content being cited. Regardless of the content's nature, the following rules for social media citations apply.

If a title is explicitly identified in a post, that title should be used. If there is no explicit title, the content of a caption, the post itself, or a summary description of the visual elements of the post may be used.

Video posted by Mike Rafi (@mikerafi), TIKTOK, *The Dreaded BLUEBOOK!* (July 27, 2023), <https://vt.tiktok.com/ZSYa5dRCv/> (on file with the Harvard Law Review).

When the name of the author of the post is unavailable, you may substitute it with the handle of the poster. In that case, the parenthetical of the poster's handle may be omitted. Handles should always be cited in the format used by the underlying platform.

Image posted by [u/orhazew](#), REDDIT (r/LawSchool), *When Roe v. Wade gets overturned on the night before your con law exam.* (2022), https://www.reddit.com/r/LawSchool/comments/uh49q6/when_roe_v_wade_gets_overturned_on_the_night/ (on file with the Yale Law Journal).

a. Visual and Audio Content (Rule 18.10.1(a))

For visual and audio content, include the (1) **type of content**, (2) **name of the poster if available and their handle in a parenthetical**, (3) **name of the platform** and (4) **any relevant subdivision within a parenthetical**, (5) **title or caption of the post if it is relevant**, (6) **date and time of the post in a parenthetical**, (7) **URL**, and a (8) permanent location where the content is stored.

Video posted by Mike Rafi (@mikerafi), TIKTOK, *The Dreaded BLUEBOOK!* (July 27, 2023), <https://vt.tiktok.com/ZSYa5dRCv/> (on file with the Harvard Law Review).

When the name of the author of the post is unavailable, it may be substituted with the handle of the poster, and in that case, the parenthetical of the poster may be omitted. Handles should always be cited in the format used by the underlying platform. This rule applies to all types of social media platform content, not just visual and audio.

⁴ For guidance on citations to federated social media, refer to Rule 18.10.1(e).

Image posted by u/orhazelw, REDDIT (r/LawSchool), *When Roe v. Wade gets overturned on the night before your con law exam.* (2022), https://www.reddit.com/r/LawSchool/comments/uh49q6/when_roe_v_wade_gets_overturned_on_the_night/ (on file with the Yale Law Journal).

b. Textual Content (Rule 18.10.1(b))

This type of content is cited similarly to visual and audio content, however, with these citations, omit the type of content from the citation. So, include the (1) name of the poster if available and their handle in a parenthetical, (2) name of the platform and (3) any relevant subdivision within a parenthetical, (4) title or caption of the post if it is relevant, (5) date and time of the post in a parenthetical, (6) URL, and (7) a permanent location where the content is stored.

Anu Bradford (@anubradford), X (Mar. 14, 2024, at 06:59 ET), <https://x.com/anubradford/status/1768230542661628035%C2%A0> [<https://perma.cc/5MZ6-3PUR>].

Adam Crews (@adamgcrews), X, *Me usually: "Law professors teach you *how* to think, not *what* to think." Me today: "I'm about to recruit 48 new soldiers to the war on Erie."* (Oct. 2, 2023, at 09:10 ET), <https://x.com/adamgcrews/status/1708831819049677051> [<https://perma.cc/PA78-RP5Q>].

c. Profiles (Rule 18.10.1(c))

Profile citations are similar to textual citations except these do not include post title or a date parenthetical. So, include the (1) name of the profile author if available and their handle in a parenthetical, (2) name of the platform and (3) any relevant subdivision within a parenthetical, (4) the URL, and (4) a permanent location where the content is stored.

LegalEagle (@djlegaleagle), INSTAGRAM, <https://www.instagram.com/djlegaleagle%C2%A0> (on file with the Columbia Law Review).

d. Reposts (Rule 18.10.1(d))

When content is reposted by another poster, you should indicate this in a parenthetical containing the name and handle of the original poster following where the content is stored. So, include the (1) name of the poster if available and their handle in a parenthetical, (2) name of the platform and (3) any relevant subdivision within a parenthetical, (4) title or caption of the post if it is relevant, (5) date and time of the post in a parenthetical, (6) URL, (7) permanent location where the content is stored, and (8) a parenthetical containing the name and handle of the original poster.

Scott Shapiro (@scottjshapiro), *X, Yes, we should wait till it's 9-0 and we have to go to Canada to buy condoms.* (Oct. 15, 2021, at 11:26 ET), <https://x.com/scottjshapiro/status/1449033840333369352%C2%A0> [<https://perma.cc/FH25-T3K3>] (reposted from CNN Politics, @CNNPolitics).

2. Communication Services (Rule 18.10.2).

When online communications are not “posted” on a platform, but are sent on a communication service, Rule 18.10.2 provides guidance for these situations depending on the medium employed.

a. Audio and Video Communications

For audio and video communications, cite to the (1) **name of the participant whose statement is being cited if applicable**, (2) type of communication, (3) **names of the participants**, (4) **name of the platform in small caps**, (5) followed by a **parenthetical indicating the date of the call**, and (6) **a parenthetical indicating where a record of the communication may be found**. When there are more than three participants, list the first three in alphabetical order by last name, and indicate the exclusions by et al.

Statement by Cain Marko, video call between Victor Creed, Raven Darkholme & Erik Lehnsherr et al., **ZOOM** (Jan. 30, 2024) (on file with the author).

You may add “, at **XX:XX**” after the participant(s) names for a pinpoint citation, but time markers are optional.

Statement by Reed Richards, audio call between Reed Richards & Viktor Vaughn, **at 09:22**, **FACETIME** (Mar. 10, 2024) (on file with the author).

b. Text Communications

For communications between two individuals, cite to the (1) **name of the author preceded by “Message from,”** (2) **name of the recipient preceded by “to,”** (3) **name of the communication service in small caps**, followed by (4) a **parenthetical indicating the date and time when the communication was sent**, and (5) **a parenthetical indicating where a record of the communication may be found**.

Message from Peter Parker to Otto Octavius, **WHATSAPP** (May 24, 2024, at 18:44 ET) (on file with the University of Pennsylvania Law Review).

For group chats, replace the name of the recipient with the **name of the group** followed by **a parenthetical indicating the names of up to three other group members starting with the phrase “group consisting of.”** When there are more than three other members, indicate this by using “et al.”

Message from Otto Octavius to the **Sinister Six (group consisting of William Baker, Maxwell Dillon & Sergei Nikolaevich Kravinoff et al.)**, SIGNAL (Oct. 10, 2024, at 06:44 ET) (on file with author).

Short Form Citations to Internet Source (Rule 18.12)

For the short form citation to internet sources, simply use the *supra* form described in Rule 4. You do not need to include the URL in the short-form citation.

¹ Eric Posner, *More on Section 7 of the Torture Convention*, VOLOKH CONSPIRACY (Jan. 29, 2009, at 10:04), <http://www.volokh.com/2009/01/29/more-on-section-7-of-the-torture-convention> [<https://perma.cc/3KEJ-ZDRU>].

² KRISPY KREME, <https://www.krispykreme.com/> [<https://perma.cc/Z5HU-HSA8>] (last visited Dec. 1, 2025).

³ Reviews of “Stranger Things,” IMDB, https://www.imdb.com/title/tt4574334/reviews/?ref_=tt_ururv_genai_sm [<https://perma.cc/ZW9Z-HLK3>] (last visited Dec. 6, 2025).

⁴ Anu Bradford (@anubradford), X (Mar. 14, 2024, at 06:59 ET), <https://x.com/anubradford/status/1768230542661628035%C2%A0> [<https://perma.cc/5MZ6-3PUR>].

⁵ Statement by Cain Marko, video call between Victor Creed, Raven Darkholme & Erik Lehnsherr et al., ZOOM (Jan. 30, 2024) (on file with the author).

⁶ Posner, *supra* note 1.

When the original full citation does not have an author, cite to the web page title or descriptive title (footnote 7) or website title (footnote 8) in the short form. Maintain the formatting and font from the full citation:

⁷ Reviews of “Stranger Things,” *supra* note 3.

⁸ KRISPY KREME, *supra* note 2.

When citing a previously referenced social media post, you may use a *supra* form with the poster’s name, if available, and handle, per Rule 4. For audio or video communications, only identify the individual whose statement is being cited.

⁹ Anu Bradford (@anubradford), *supra* note 4.

⁹ Statement by Cain Marko, *supra* note 5.