



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 has revamped Rule 18 and liberalized citation to non-print sources—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 resources and will provide you with some guidance on when *The Bluebook* permits citation to an internet resource and how you should format that citation.¹ It focuses on the use of internet citations 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.

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:

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

* Revised by Richard Bernache and Halle Edwards in 2021, based on a revision by John Secaras in 2017.

¹ This handout does not address direct citation to commercial databases like Lexis and Westlaw materials, which have their own citation format under Rule 18.3.

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:



This seal notifies users that a document has been authenticated by GPO. By using digital signature technology to add the Seal to a PDF document, GPO attests that the document has not been altered since it was authenticated and disseminated by GPO.

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. Massachusetts, for example, only publishes some of its recent versions of documents online as this portion of its website demonstrates³:

State Documents Online

A growing number of state publications are now available electronically, either digitized or created in digital form. These include recent documents that are published solely in electronic form and heavily-used series that have been digitized, such as Massachusetts Election Statistics and the Massachusetts Acts and Resolves.

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. 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 it 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. In the citation below, the substantive print citation is shown in red, while the appended electronic citation is blue:

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>

John Kass, *Don't Let Science Suck Life Out of Chupacabra Story*, CHI. TRIB., Mar. 31, 2011, at 2, <http://www.chicagotribune.com/news/columnists/ct-met-kass-0331-20110331,0,2711028.column>.

A few comments about the structural form of this citation: First, note that only a comma follows the full print citation—The Bluebook no longer requires the use of “available at” to denote an online source. 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.

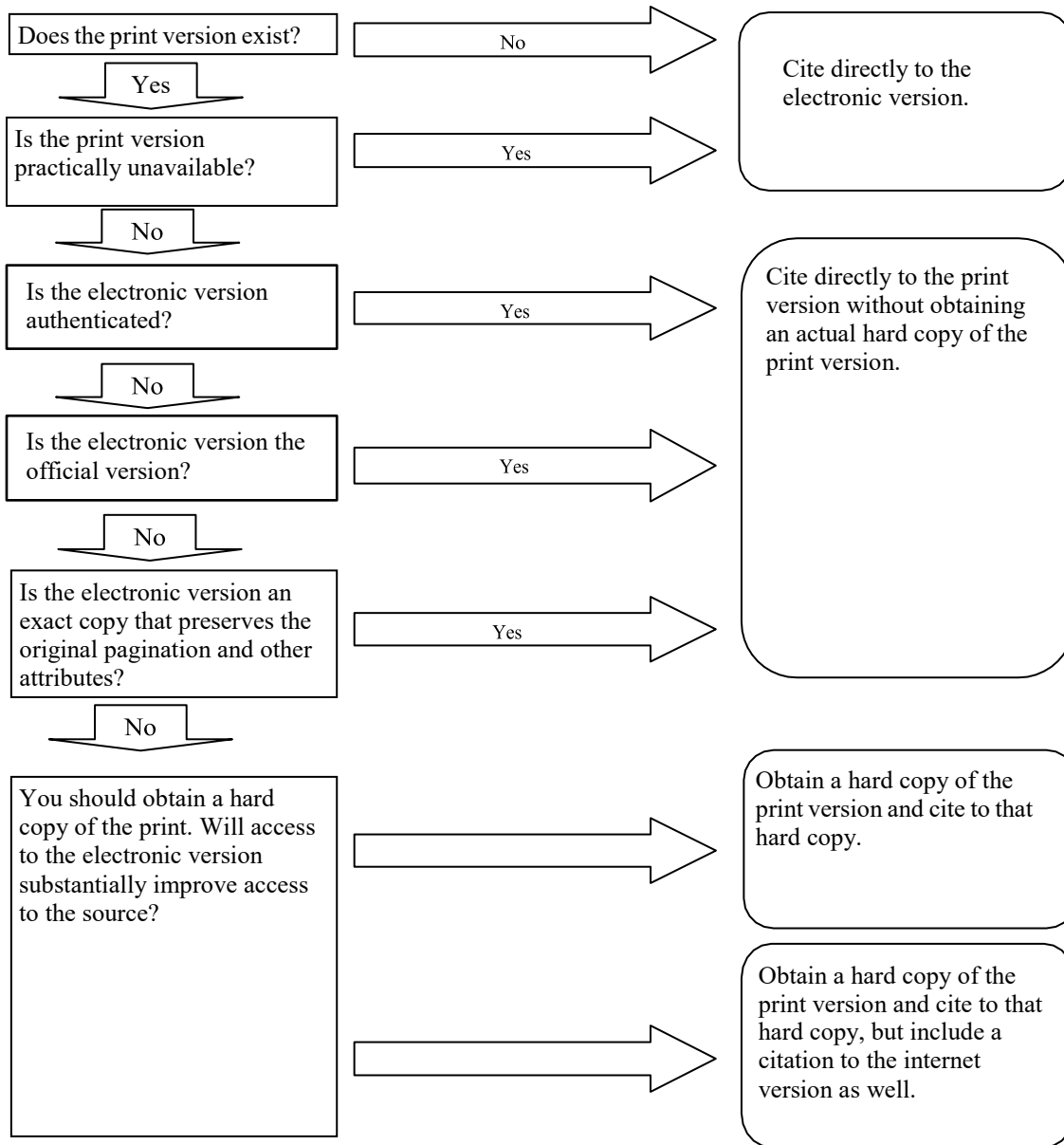
Electronic Citations

The Bluebook considers all internet citations 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 simply adding the URL 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:

Conference Report, German Soc’y for Contemporary Theatre and Drama in English, *Mediated Drama/Dramatized Media: From Boards to Screens to Cyberspace* (Jun. 17-20, 1999), <http://fb14.uni-mainz.de/projects/CDE/conf/1999/>.

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,
- (2) the title of the web page,
- (3) the title of the website,
- (4) the date and time, and
- (5) the URL.

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 (Rule 18.2.2(a))

If the web page 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, 10:04 AM), <http://www.volokh.com/2009/01/29/more-on-section-7-of-the-torture-convention>.

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: Kraft Foods, *Chocolate Turtle Cheesecake*, WWW.KRAFTRECIPES.COM, <http://www.kraftrecipes.com/recipes/chocolate-turtle-cheesecake-112859.aspx> (last visited Apr. 11, 2011).

Example 2: The Butterfly Conservatory, AM MUSEUM OF NATURAL HISTORY, http://www.amnh.org/exhibitions/butterflies/?src=h_h (last visited Feb. 1, 2009).

When citing to a specific comment or posting, list the username of the commenter or poster as the author rather than the author of the original piece:

Martinned, Comment to *More on Section 7 of the Torture Convention*, VOLOKH CONSPIRACY (Jan. 29, 2009, 11:02 AM), <http://www.volokh.com/posts/1233241458.shtml>.

For citations to social media feeds, include the author's name if it is discernible and verified. If the platform lets authors employ a username or handle when posting, include the username or handle in parentheses immediately after the author name (Example 1). If the author name is not discernible and verified, you can use only the username or handle (Example 2). After including any author information, you should provide the title of the post (when applicable) and the name of the social media platform (Example 3):

Example 1: Wendy Davis (@wendydavistexas), INSTAGRAM,
<http://instagram.com/wendydavistexas> (last visited May 20, 2014).

Example 2: @LegalRebels, TWITTER (Mar. 24, 2014, 10:36 AM),
<https://twitter.com/LegalRebels/status/448151433222062080>.

Example 3: November Project, *The Bubble Is GONE!*, FACEBOOK (Mar. 19, 2014), <https://www.facebook.com/media/set/?set=a.516646258443810.1073741983.246449015463537&type=1>

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, 10:04 AM), <http://www.volokh.com/posts/1233241458.shtml>.

When citing to a specific posting or comment within an article, say so in the title section of the citation. Importantly, this annotation should not be italicized:

Martinned, *Comment to More on Section 7 of the Torture Convention*, VOLOKH CONSPIRACY (Jan. 29, 2009, 11:02 AM), <http://www.volokh.com/posts/1233241458.shtml>.

If the comment or posting has its own title, include that title in addition to the title of the page to which the comment or posting responds. Separate the two titles with a comma and designate the relationship between the two pages with a phrase such as “comment to”:

Packerland Progressive, *How is SEC 115 Constitutional Under INS v. Chadha?*, *Comment to This Week in Congress*, DAILY KOS (Jan. 19, 2009, 9:20 AM), <http://www.dailykos.com/storyonly/2009/1/18/235223/489/683/685802>.

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

Archive of Columns by William Safire, N.Y. TIMES, <http://www.nytimes.com/top/opinion/editorialsandoped/oped/columnists/williamsafire/> (last visited Jan. 17, 2004).

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:

Weird and Dumb International Laws, JUSTICEDAILY.COM, <http://www.justice/weird/part2.html> (last visited May 21, 2004).

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. Abbreviate the date using Table T12:

Pavement Planning New Album Release, GLIDEMAG. (Nov. 6, 2009), <http://www.glidemagazine.com/articles/55317/pavement-planning-new-album-release.html>.

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

Ashby Jones, *Activists, Research Facilities Taking Disclosure Battles to Court*, WALL ST. J.: L. BLOG (Feb. 26, 2009, 9:40 AM), <http://blogs.wsj.com/law/2009/02/26/activists-research-facilities-taking-disclosure-battles-to-the-courts>.

If the web page lacks a date for the specific subject matter to which you are citing, indicate the “last modified” or “last updated” date from the website in a parenthetical following the URL.

Dale Fast, *History of Biology and Medicine*, St. Xavier Univ., http://faculty.sxu.edu/~fa_st/general_biology/history.htm (last updated Oct. 31, 2001).

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> (last visited Dec. 15, 2004).

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:

- 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 Bluebook rules.

Archival (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* encourages archiving internet sources, but only when you have access to a reliable archival tool. Be sure to ask whether your journal, professor, or supervisor requires archival and what the preferred method of archival is for that assignment.

When providing an archived link to internet sources, 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 AM), http://www.huffingtonpost.com/2013/07/25/puerto-rico-status-debate_n_3651755.html [<http://perma.cc/C6UP-96HN>].

Short Form Citations to Internet Source (Rule 18.9)

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 See Douglas Gantenbein, *Mad Cows Come Home*, SLATE (Jan. 5, 2004, 12:10 PM), <http://slate.msn.com/id/2093396>.

² PFIZER, INC., <http://www.pfizer.com> (last visited Jan. 17, 2004).

³ *Weird and Dumb International Laws*, JUSTICEDAILY.COM,
<http://www.justicedaily.com/weird/part2.html> (last visited May 21, 2004).

⁴ *Gantenbein*, *supra* note 1.

When the original full citation does not have an author, cite to the web page title (footnote 5) or website title (footnote 6) in the short form. Maintain the formatting and font from the full citation:

⁵ *Weird and Dumb International Laws*, *supra* note 3.

⁶ PFIZER, INC., *supra* note 2.