

(1) The PLO qualifies under 4302(a)(B)

(2) The PLO is an <sup>agency or</sup> entity w/n 4302(a)(4) given their ordinary meaning and the discretion given the Secy by Congress to define terms

(a) In 19... an office could qualify as a "foreign mission" if it was an "official mission" etc. a's brief p. 27.

(b) In 1985 Congress changed "official mission" to "mission or agency in the U.S." etc.

(c) In 1986 Congress expanded it again to simply include AN "entity". No way to limit the Com'l entities by virtue of a single passage in Senate Comm Report but this cannot defeat plain meaning of the term. Moreover, Congress "COVERS" use the object of Congress intention (see a's brief p. 23) at this time + it is not disputed here that the PLO is an Agent of the PLO.

City Scalia Opinion  
that Comm Reports not  
binding - Sutherland on  
Statutory Construction

(3) PLO is subject to laws or controlled by PLO, thus, Ex Regulation is permitted

(a) Ex has broad power to determine control in context of foreign policy & words such as "control" should not be given arcane, technical meanings. Even though questions of control may contain elements of fact they are largely interpretive in foreign policy context.

B. Foreign Policy Determinations by the Cong'l + Ex Branches are Entitled to Great Deference and To Demand Evidence Fully Supports the Gov's position here + provides the necessary factual predicate.  
Alouez v Reagan 785 F.2d 1043  
1085 Ct 252 (87) + host of others.

C. The Gov has failed to sustain their Burden of Proof for Injunctive Relief  
D. The Court is specifically not Injunctive -