Indeed, in these times, the dangers of falsified news and manufactured and manipulated audio and video are extreme, and ever increasing. The Supreme Court in 1964 could not have even imagined how polluted and even dangerous the national and worldwide information ecosystem would become. "Deepfakes" are "[a] devastating new tool in the disinformation wars [and are] poised to be deployed on a large scale that may soon supplant memes and fake news as industry standards for perverting truth and accuracy in the age of digital confrontation." "Deepfakes Are Very Real -- And Very Dangerous," Forbes (Oct. 16, 2019), available at https://www.forbes.com/sites/theyec/2019/10/16/deepfakes-are-very-real-and-very-dangerous/#2b5139c9493f

Supreme Court justices may not have been technological futurists in 1964, but as is often the case, the Court's First Amendment jurisprudence was prescient. The Court always cautioned of the price of free speech, and clearly stated that the First Amendment provides no haven for knowing lies such as the false Manufactured Statement in the PUSA ads comprised of stitched-together false audio and textual subtitles. Such knowing falsity is not protected by the First Amendment and it finds no safe harbor in the actual malice standard. As the U.S. Supreme Court held in *Gertz v. Welch, Inc.*, 418 U.S. 323, 340 (1974): "[T]here is no constitutional value in false statements of fact. Neither the intentional lie nor the careless error materially advances society's interest in 'uninhibited, robust, and wide-open' debate on public issues."

Known lies are a danger to democracy and thus they are not protected by the First Amendment, as one court explained:

> The First Amendment, however, does not afford defamatory political speech absolute immunity. *See id.* at 455, 548 S.E.2d at 876; *Stevens v. Sun Publ'g Co.*, 270 S.C. 65, 71, 240 S.E.2d 812, 815 (1978) ("An individual's status as a public figure does not immunize a publisher from liability when it prints defamatory articles with malice."); *Harte–Hanks Communications, Inc. v. Connaughton*, 491 U.S. 657, 688, 109 S. Ct. 2678, 105 L.Ed.2d 562 (1989) ("We have not gone so