

From: Center for Judicial Accountability, Inc. (CJA) <elena@judgewatch.org>
Sent: Friday, August 22, 2025 12:57 PM
To: 'Thane Rosenbaum'
Cc: 'brooke@thelawfareproject.org'; 'ben@thelawfareproject.org';
'ziporah@thelawfareproject.org'; 'gerard@thelawfareproject.org';
'jaclyn@thelawfareproject.org'
Subject: Questions for Thane Rosenbaum -- Federal lawsuit vs NYT & Other NY Press
for rigging Mamdani's election to be NYC mayor by their "journalistic
fraud", concealing his corruption as a NYS assemblyman & legitimizing his
falsehoods about Israel
Attachments: [3-14-25-email-to-mamdani.pdf](#);
[8-22-25-alert-to-jewish-pro-israel-communities.pdf](#)

Dear Thane,

Apologies for inadvertently omitting you as a cc to my below e-mail, whose added links to my e-mails to the Associated Press on [July 27th](#) and [August 3rd](#) – and their embedded links -- are must-reads.

On the topic of AP, are its Israel-reporting correspondents, editors, and management unaware of your book [Beyond Proportionality: Israel's Just War in Gaza](#)? What about at [The New York Times](#) and the rest that keep reporting and opinionating as they do?

For your convenience – and that of The Lawfare Project – here, directly, are the 2003 law review article "[Journalistic Malpractice: Suing Jayson Blair and the New York Times for Fraud and Negligence](#)", proposing a cause of action for "journalistic fraud" as viable under the First Amendment and waiting to be tested, which I then tested and proved to be viable, as, likewise, the cause of action proposed by the 2005 law review article "[Institutional Reckless Disregard for Truth in Public: Defamation Actions against the Press](#)", indirectly accessible from the links in my below August 19th e-mail to [The Jerusalem Post](#).

I look forward to discussion about the foregoing, so vital to Israel, the US, and the world. Perhaps a zoom call or in-person-meeting at The Lawfare Project's Manhattan office next week?

Thank you.

Elena
914-421-1200

From: Center for Judicial Accountability, Inc. (CJA) <elena@judgewatch.org>
Sent: Friday, August 22, 2025 11:28 AM
To: 'brooke@thelawfareproject.org' <brooke@thelawfareproject.org>; 'ben@thelawfareproject.org' <ben@thelawfareproject.org>; 'ziporah@thelawfareproject.org' <ziporah@thelawfareproject.org>; 'gerard@thelawfareproject.org' <gerard@thelawfareproject.org>; 'jaclyn@thelawfareproject.org' <jaclyn@thelawfareproject.org>

Subject: Correction & Addition: Federal lawsuit vs NYT & Other NY Press for rigging Mamdani's election to be NYC mayor by their "journalistic fraud", concealing his corruption as a NYS assemblyman & legitimizing his falsehoods about Israel

TO: [THE LAWFARE PROJECT](#)

Brooke Goldstein, Founder & Executive Director
Benjamin Ryberg, COO & Director of Research
Ziporah Reich, Director of Litigation
Gerard Filitti, Senior Counsel
Jaclyn Clark, Counsel

My below e-mail to you earlier this morning bounced back for Ms. Reich as I had erroneously doubled the p in her first name. Apologies.

As my e-mail identified "the Israel-reporting Associated Press" as among the NY press that, in addition to The New York Times, "will NOT survive reputationally or financially" the federal lawsuit for which I am seeking The Lawfare Project's assistance, here are my two most recent e-mails to AP, on [July 27th](#) and [August 3rd](#), to which there was no response and no reporting. Summary judgment...

Thank you.

Elena Sassower

From: Center for Judicial Accountability, Inc. (CJA) <elena@judgewatch.org>

Sent: Friday, August 22, 2025 8:32 AM

To: 'brooke@thelawfareproject.org' <brooke@thelawfareproject.org>; 'ben@thelawfareproject.org' <ben@thelawfareproject.org>; 'zipporah@thelawfareproject.org' <zipporah@thelawfareproject.org>; 'gerard@thelawfareproject.org' <gerard@thelawfareproject.org>; 'jaclyn@thelawfareproject.org' <jaclyn@thelawfareproject.org>

Cc: 'Thane Rosenbaum' <thane.rosenbaum@touro.edu>

Subject: Federal lawsuit vs NYT & Other NY Press for rigging Mamdani's election to be NYC mayor by their "journalistic fraud", concealing his corruption as a NYS assemblyman & legitimizing his falsehoods about Israel

TO: [THE LAWFARE PROJECT](#)

Brooke Goldstein, Founder & Executive Director
Benjamin Ryberg, COO & Director of Research
Zipporah Reich, Director of Litigation
Gerard Filitti, Senior Counsel
Jaclyn Clark, Counsel

Thank you for the important work you are doing.

This follows up the voice mail message I left yesterday afternoon, which I designated as urgent, and, additionally, the messages I transmitted *via* your [contact webpage](#) and then *via* your [get legal help webpage](#), the latter stating:

"I am director & cofounder of the non-partisan, non-profit citizens organization Center for Judicial Accountability, Inc (CJA) [www.judgewatch.org] -- and, additionally, a Jew, Zionist, lived in Israel for 4 years, and worked at the Israel Mission to the UN for 10 months under Benjamin Netanyahu, who I greatly admire. The NYT & other NY press are dovetailing their anti-Israel animus to election-rig for Mamdani to be NYC's next mayor, concealing his corruption as a NYS assemblyman -- the EVIDENCE of which they have but do not report, notwithstanding it is dispositive that he is unfit for ANY office of public trust & must be indicted and will be convicted. Here's a link to my August 19th e-mail to The Jerusalem Post, summarizing the situation and furnishing EVIDENTIARY links: <https://www.judgewatch.org/press-nys/2025/aug/8-19-25-email-to-jpost.pdf>.

I would like assistance in bringing a federal lawsuit vs the NYT & other NY press for their election-rigging 'journalistic fraud' -- the same cause of action as I proposed in my August 19th e-mail to The Jerusalem Post that Prime Minister Netanyahu use for a lawsuit against the NYT for its defamations about Israel and starving babies in Gaza -- the viability of which, under the First Amendment, I tested and proved in two lawsuits, brought in NYS courts, against the NYT and Gannett -- cited to and linked by my August 19th e-mail." (indicated hyperlinks here made live).

Below, to facilitate your review, is the original August 19th e-mail to The Jerusalem Post, whose relevant paragraph pertaining to Prime Minister Netanyahu and the cause of action for "journalistic fraud" states, in full:

"Finally, kindly forward this e-mail to Caroline Glick, who '[formerly held senior editorial roles at The Jerusalem Post](#)', for transmittal to the prime minister, so that both will know what is going on in NY -- and the answer to what the prime minister [publicly stated](#) about The Times' photos and reporting about starving babies in Gaza: '[The] New York Times should be sued...I'm actually looking at whether a country can sue The New York Times, and I'm looking into it right now, because I think it's such a... it's such clear defamation.' The answer is that irrespective of whether a country can sue, the prime minister can sue, as Israel's leader and on his own behalf -- and such should be not only for defamation, but on causes of action for '[journalistic fraud](#)' and '[institutional reckless disregard for truth](#)' -- whose viability, proposed by law review articles, I proved by [two landmark lawsuits against The Times and against Gannett](#), never reported by the press or embodied in scholarship." (live hyperlinks in the original).

I look forward to discussing with you the federal lawsuit I am proposing, as it is one that the NYT and such other NY press as the Israel-reporting Associated Press will NOT survive reputationally or financially, based on the mountain of primary-source, documentary EVIDENCE I have, spanning decades, of their *knowingly* false, corruption-abetting, election-rigging journalism pertaining to NY and US governance -- underlying their election-rigging for Mamdani. Such lawsuit would powerfully reinforce and, of course, itself be reinforced, by a lawsuit by the prime minister against the NYT, *et al.* -- which I think is the ONLY way to curtail, dramatically, the endless repetition of brazen falsehoods about Israel that the NYT, AP, and other press put forward, as if not rebutted, resoundingly by fact and law. In that connection, I am sure you are familiar with Law Professor Thane Rosenbaum's scholarly book [Beyond Proportionality: Israel's Just War in Gaza](#), whose release in May seems to have had no effect on their reporting and opinionating -- or on Mamdani.

As I believe Professor Rosenbaum has much to contribute to the success of both lawsuits -- and because he is already familiar with my below August 19th e-mail to The Jerusalem Post and with my above-attached

“ALERT TO NEW YORK’S JEWISH & PRO-ISRAEL COMMUNITIES”, which I sent him last night – I am taking the liberty of cc’ing him.

I look forward to discussing the foregoing with you, at your earliest convenience, time being of the essence. I am available, no matter how early or late – and over the weekend.

Thank you.

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From: Center for Judicial Accountability, Inc. (CJA) <elena@judgewatch.org>
Sent: Tuesday, August 19, 2025 2:43 PM
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Cc: 'kurt@camera.org' <kurt@camera.org>; 'mark@camera.org' <mark@camera.org>; 'rickih@camera.org' <rickih@camera.org>; 'dlitman@camera.org' <dlitman@camera.org>; 'action@honestreporting.com' <action@honestreporting.com>

Subject: URGENT: The NYT & other NY press are dovetailing their anti-Israel bias to election-rig for Mamdani to be NYC's next mayor. Will you forward this for reporting by your "Diaspora affairs" journalists -- & to Caroline Glick for Prime Minister Netanyahu?

TO: THE JERUSALEM POST

ATT: Editor-in-Chief Zvika Klein

I am a Jew, Zionist, lived in Israel for four years, and worked for 10 months at the Israel Mission to the UN under Benjamin Netanyahu, who I greatly admire. I am, additionally, director and co-founder of the NY-based nonpartisan, nonprofit citizens’ organization [Center for Judicial Accountability, Inc. \(CJA\)](http://www.judgewatch.org) – and, [for decades](#), have documented the *knowingly false* journalism of [The New York Times](#) and other press pertaining to U.S. governance, specifically relating to judicial selection and discipline on federal and NY state and local levels – essentially paralleling what CAMERA ([Committee for Accuracy in Middle East Reporting and Analysis](#)) and [HonestReporting](#) document about how [The Times](#) and other press report and editorialize about Israel.

These two strands of knowingly false journalism, as to Israel and as to NY state and local governance, have led to the rise of Zohran Mamdani to be NYC’s next mayor. Mamdani’s anti-Israel, pro-Hamas falsehoods have been given credibility and resonance by the pervasive anti-Israel slanting and defamations of [The Times](#) and other NY press, which have, simultaneously, been concealing his corruption as a NYS assemblyman, for which he must be indicted and will be convicted – the EVIDENCE of which they have, but do not report. The result of their flagrant election-rigging for Mamdani – including their propagating of polls rigged by their journalism – is that Jewish and pro-Israel communities, among so many others, are dispirited and inhibited from mobilizing against him because of the purported inevitability of his electoral

victory in November. **This is catastrophic, as Mamdani can be defeated, easily and without money, simply by the press doing its job of reporting on the EVIDENCE of his corruption as a NYS assemblyman.**

The Jewish and pro-Israel communities MUST be alerted to what is going on in NY with Mamdani and the NYC mayoral race – and the starting point is my above-attached March 14th e-mail to him entitled “ELECTIONS ARE A TIME OF ACCOUNTABILITY...”, which I e-mailed to The Times and a substantial portion of NY’s press, long before and since his June 24th Democratic primary win. CJA’s website posts these e-mails, accessible [here](#) – and among them my below most recent three e-mails to The Times, on [July 11th](#), [July 13th](#), and [August 9th](#), to which – like my predecessor e-mails to The Times and my [May 18th letter to Publisher A.G. Sulzberger](#) – there has been NO response.

As you were formerly The Jerusalem Post’s “[Diaspora affairs correspondent](#)”, who is the journalist who has succeeded you in that position – and, if no one, who are The Jerusalem Post’s journalists or news sources on which it relies for this kind of Israel-Diaspora reporting? Will you forward this e-mail to them, ASAP?

Finally, kindly forward this e-mail to Caroline Glick, who “[formerly held senior editorial roles at The Jerusalem Post](#)”, for transmittal to the prime minister, so that both will know what is going on in NY – and the answer to what the prime minister [publicly stated](#) about The Times’ photos and reporting about starving babies in Gaza: “[The] New York Times should be sued...I’m actually looking at whether a country can sue The New York Times, and I’m looking into it right now, because I think it’s such a... it’s such clear defamation.” The answer is that irrespective of whether a country can sue, the prime minister can sue, as Israel’s leader and on his own behalf – and such should be not only for defamation, but on causes of action for “journalistic fraud” and “institutional reckless disregard for truth” – whose viability, proposed by law review articles, I proved by [two landmark lawsuits against The Times and against Gannett](#), never reported by the press or embodied in scholarship.

I am available, *no matter how early or late*, to answer questions and be interviewed. TIME IS OF THE ESSENCE, obviously.

Thank you.

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From: Center for Judicial Accountability, Inc. (CJA) <elena@judgewatch.org>
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Subject: Mamdani's corruption as a NYS assemblyman -- & the corruption of other top NYC Democratic primary winners, Brad Hoylman-Sigal, Jumaane Williams, Alvin Bragg, & of the not primaried Eric Gonzalez

TO: [New York Times Assistant Managing Editor Patrick Healy/Standards & Trust](#)

When will you be responding to my below July 13th and July 11th e-mails pertaining to Mamdani and the NYC mayoral and other elections?

Are you unaware that notwithstanding my July 13th e-mail highlighted the fraud of The Times' May 28th article "[Mamdani Has a Thin Legislative Record but Is a Forceful Voice in Albany](#)", The Times linked to it in its August 6th article "[Cuomo Tells Business Leaders That His Campaign Is on a New Path](#)", stating:

"Mr. Mamdani, who has a [strong lead in the polls](#), has defended [his record as a state lawmaker](#)..."

Is it your view that the May 28th article accurately depicts Mamdani's "[record as a state lawmaker](#)" and that there is no corruption and larceny in that "record" that The Times was obligated to report and have Mamdani "defend[]" prior to his June 24th primary win? What about now? Isn't it obvious that Mamdani's "[strong lead in the polls](#)" would tumble were The Times to report on his knowing participation in the obliteration of constitutional, lawful state governance, involving the state budget, his own legislative salary, and NY's oversight/"public protection" entities – the EVIDENCE of which I furnished The Times repeatedly before June 24th – and thereafter twice, by my July 11th and July 13th e-mails. Do you deny that such EVIDENCE establishes that **Mamdani cannot be elected NYC mayor, because he must be indicted and will be convicted – and, so too, Cuomo and Adams, if not, additionally, Sliwa and Walden.**

Absent your denying same, The Times' duty is to report on the EVIDENCE, *pronto* – not, as it has been doing, further rigging the NYC mayoral race by misleading the public and business leaders about the situation, including the deceit that "tak[ing] down" Mamdani is difficult, costly, or requires strategic sacrifice by candidates, as by The Times' July 30th article "['Anybody but Mamdani': 5 Groups Emerge to Raise Millions in Attack Funds](#)", stating:

"with fewer than 100 days to go, [leaders of New York's business elite] are [still very much searching for a unified plan that could work](#)";

"It remains [far from clear if the anti-Mamdani forces can find a successful path](#), especially when the opposition is divided among several more moderate candidates..."

"A recent poll paid for by the [Real Estate Board of New York] showed [only long-shot paths](#) to victory for Mr. Cuomo and for Mr. Adams... In a city where Democrats outnumber

Republicans six to one, those numbers bode poorly for anyone challenging Mr. Mamdani";

"Three political consultants who have either started independent expenditure groups or have advised donors looking to fund one said they warned donors that the likelihood of defeating Mr. Mamdani is slim unless either the mayor or former governor drops out." (underlining added)

Then, too, is the article's misimpression by its unchallenged quote from a Mamdani campaign spokeswoman:

"New Yorkers are ready to turn the page on endless corruption and backroom deals" --

when Mamdani has been part of the "endless corruption and backroom deals" -- and this has brought him to where he is today, aided, of course, by The Times' pervasively biased, fraudulent journalism on Israel, making Mamdani's anti-Israel falsehoods seem legitimate and acceptable.

So that the panoply of Times reporters who have been reporting on Mamdani and the NYC mayoral race can be on notice of the situation and guided accordingly, I am cc'ing them on this e-mail, along with those cc'd by my July 11th and July 13th e-mails.

By the way, when will these, or other Times reporters, be reporting on the record of corruption, *in office*, of top NYC Democratic primary winners NYS Senator Brad Hoylman-Sigal, running to be Manhattan borough president, NYC Public Advocate Jumaane Williams, Manhattan D.A. Alvin Bragg, and of the non-primaried Brooklyn D.A. Eric Gonzalez -- the EVIDENCE of which is identical to, and reinforcing of, the EVIDENCE against Mamdani -- and which I furnished The Times, repeatedly, *prior* to the June 24th primaries, by the webpage "ELECTIONS 2025 -- INFORMING THE VOTERS -- ALERT: Corrupt candidates & incumbents are on the ballot".

Please let me hear from you with respect to the foregoing, as is your duty as The Times' Standards & Trust Editor, or furnish it to Publisher Sulzberger and Times legal counsel for response. I am available to answer questions and to be interviewed, *no matter how early or late*. TIME IS OF THE ESSENCE, obviously.

Thank you.

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From: Center for Judicial Accountability, Inc. (CJA) <elena@judgewatch.org>
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Cc: 'grace.ashford@nytimes.com' <grace.ashford@nytimes.com>; 'ben.oreskes@nytimes.com' <ben.oreskes@nytimes.com>; 'jay.root@nytimes.com' <jay.root@nytimes.com>; 'metro@nytimes.com' <metro@nytimes.com>; 'editorial@nytimes.com' <editorial@nytimes.com>; 'nytnews@nytimes.com'

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Subject: AGAIN -- The Times' "News Value" Standard & Confirmation "Through Direct Sources" -- MAMDANI, etc.

TO: New York Times Assistant Managing Editor Patrick Healy/Standards & Trust

Eight hours after sending you my below July 11th e-mail – whose several typos in Mamdani's name I have now corrected – the New York Post published "[Zohran Mamdani's campaign persona called into question by vote to give himself raise: critics](#)", identifying that "Mamdani did not respond to The Post's request for comment."

Apparently, The Post saw "news value" in its July 11th story. Do you? Will The Times be following up by requesting Mamdani's comment to The Post article – the tiniest sliver of Mamdani's hypocrisy and corruption that my below linked March 14th, March 17th, March 18th, and March 20th e-mails to him establish. Have you not yet determined their "news value"?

By the way, is The Times' May 28th article "[Mamdani Has a Thin Legislative Record but Is a Forceful Voice in Albany](#)" the only article The Times published about his record as an assemblyman – so puny that it had to be bolstered by comments from other legislators, ALL Democrats, as to his "forceful voice" "to move the ideological center of the Assembly to the left", interspersed with The Times' usual anti-Israel slanting and slander, consistent with Mamdani's lies as, for instance, in stating: "Mr. Mamdani stands firm in his defense of Palestinians in Gaza, where over [53,000 people have been killed](#) by Israeli forces" – when revealed by the hyperlink is that this figure is "according to Palestinian health officials, who do not distinguish between civilians and combatants" – in other words, it is according to Hamas.

Suffice to say, this May 28th article, by two of your three Albany reporters – recipients of my March 18th and March 20th e-mails and of my May 18th letter to Publisher Sulzberger – concealed the ENTIRETY of what the e-mails particularized, with evidence, and falsely made it appear as if there is nothing irregular in how the Legislature operates, including pertaining to the budget and this fiscal year, and the inclusion of policy – indeed, concluding, as follows:

"Perhaps the most telling evidence of Mr. Mamdani's evolution came earlier this month, when the budget bills came up for a vote. As in years past, they contained scores of policy changes, not all to Mr. Mamdani's liking. Mr. Mamdani voted yes."

For that "yes" vote alone, Mamdani cannot be elected NYC's next mayor, because – based on my e-mails to him – he must be indicted and will be convicted of corruption. If you have any doubt of this, you should "confirm it through direct sources", such as [former Assistant U.S. Attorney for the Eastern District of New York Jim Walden](#), running for NYC mayor as an independent, with an [anti-corruption policy platform featured on his campaign website](#).

Tellingly, [Mamdani's campaign website contains no anti-corruption platform](#) – and none is reflected in The Times' July 9th guest essay "[If Zohran Mamdani Wins, Then What?](#)" by Ross Barkan, with its required disclosure: "In 2018, when I ran for state senator in New York City, Mr. Mamdani was my campaign manager". Barkan, a left-wing, agenda-driven journalist, is an accomplice to the corruption of lawful, constitutional state governance involving the Legislature, the budget, and pay raises. [As far back as May 2013](#), I furnished him with the evidence of what was going on, including my [April 15, 2013 complaint to then U.S. Attorney for the Southern District of New York Preet Bharara](#) – sending him e-mail, after e-mail,

to which he never responded. This includes when he was campaigning for the Senate, such as my [October 4, 2017](#) and [January 17, 2018](#) e-mails to him reflecting my entreaties that he could easily win election and, simultaneously, propel non-partisan, good-government reform if he would “blow the whistle” on the corruption of the Senate incumbent – entreaties I would repeat in my e-mails in 2020 to Mamdani, running against an Assembly incumbent. In any event, nothing could be more obscene than Barkan’s sentence, in his essay, “There cannot be any whiff of self-dealing or graft in the Mamdani administration”, considering that “self-dealing” and “graft” are precisely how Mamdani became and conducted himself as an assemblyman, in collusion with his fellow self-dealing, grafting legislators, who would then endorse and support his mayoral candidacy.

Please advise by no later than noon tomorrow, July 14th, whether you will be confirming from Mamdani the obvious truth of my e-mails to him, etc.

Thank you.

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From: Center for Judicial Accountability, Inc. (CJA) <elena@judgewatch.org>
Sent: Friday, July 11, 2025 10:27 AM
To: 'pdh@nytimes.com' <pdh@nytimes.com>
Cc: 'grace.ashford@nytimes.com' <grace.ashford@nytimes.com>; 'ben.oreskes@nytimes.com' <ben.oreskes@nytimes.com>; 'jay.root@nytimes.com' <jay.root@nytimes.com>; 'metro@nytimes.com' <metro@nytimes.com>; 'editorial@nytimes.com' <editorial@nytimes.com>; 'nytnews@nytimes.com' <nytnews@nytimes.com>; 'letters@nytimes.com' <letters@nytimes.com>; 'benjamin.mullin@nytimes.com' <benjamin.mullin@nytimes.com>

Subject: The Times' "News Value" Standard & Confirmation "Through Direct Sources" -- The "On-The-Job Performance" of Mamdani & Hoylman-Sigal as State Legislators, Corrupting Lawful, Constitutional State Governance & Irreparably Injuring the People of New York

TO: [New York Times Assistant Managing Editor Patrick Healy/Standards & Trust](#)

The Times' July 4th article "[Mamdani Once Claimed to Be Asian and African American. Should It Matter?](#)" quotes [your statement](#):

“When we hear anything of news value, we try to confirm it through direct sources. Mr. Mamdani confirmed this information in an interview with The Times.”

Are you aware of my [March 14th e-mail](#) to Mamdani entitled “ELECTIONS ARE A TIME OF ACCOUNTABILITY...”, whose supplement I sent him on [March 17th](#) – thereafter sending both to him again when I cc’d him on my [March 18th e-mail](#) to the roster of Legislative Correspondents Association reporters – The Times’ three Albany reporters among them – and then, again, when I cc’d him on my [March 20th e-mail](#) to The Times, New York Post, Daily News, New York Law Journal, Wall Street Journal, and Associated

Press, with the five Times e-mail addresses being Metro and Editorial in addition to the three Albany reporters.

The March 20th e-mail I would then feature as “Example #1”, at page 1, of my mailed [May 18th letter to Publisher A.G. Sulzberger](#), e-mailed to eight Times e-mail addresses, including Editorial, Metro, and the three Albany reporters, on [May 18th](#) and [May 19th](#).

As the “news value” of my e-mails to Mamdani is obvious, did The Times not ask him to confirm their equally obvious truth? And if not, why not – and will it do so now that he has won the Democratic primary to be New York City mayor?

Also, and plainly reinforcing, was the obvious “news value” of my [March 16th e-mail](#) to Senator Brad Hoylman-Sigal, also entitled “ELECTIONS ARE A TIME OF ACCOUNTABILITY...”, and additionally sent to him, twice, when I cc’d him on the March 18th and March 20th e-mails of which it was part. Did The Times not ask Hoylman-Sigal to confirm the equally obvious truth of these e-mails to him? If not, why not – and will it do so now that he has won [the Democratic primary to be Manhattan borough president](#)?

Please advise – including as to when you would like to interview me with respect to the foregoing election-upending EVIDENCE of the “on-the-job performance” of Mamdani and Hoylman-Sigal as state legislators, corrupting lawful, constitutional state governance and irreparably injuring the People of New York.

Thank you.

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