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Subject: **Expert Opinion & Scholarship Needed -- Guarantee Clause of the U.S. Constitution -- & Federal Lawsuit vs The NYT & 33 Other Press Defendants Pursuant Thereto in Vindication of the First Amendment & Constitutional, Lawful Governance**

Attachments: [amended-complaint-oct-29-2025-signed-by-zerman.pdf](#)

TO: [GEORGETOWN CENTER FOR THE CONSTITUTION](#)
[Faculty Director Law Professor Randy E. Barnett](#)
[Faculty Co-Director Law Professor Stephanie Barclay](#)

I am director and co-founder of the nonpartisan, nonprofit citizens' organization [Center for Judicial Accountability, Inc. \(CJA\)](#).

A propos of the [Georgetown Center for the Constitution's webpage on the Guarantee Clause](#), posting six law review articles, I am writing to alert you to a major federal lawsuit pursuant to the Guarantee Clause that CJA and I have brought on our own behalf and "*on behalf of the People of the State of New York & the Public Interest*" against [The New York Times](#) and 33 other representative press defendants – as to which there has been NO response from the scholars who authored those six law review articles to my e-mails requesting their expert opinions, scholarship, and other assistance.

Above-attached and here-linked is the evidence-rich [October 29, 2025 amended verified complaint, as signed by CJA's counsel and refiled on January 5, 2026](#), in what is plainly a monumental, history-making case, pursuant to the Guarantee Clause and the First, Fifth, and Fourteenth Amendments to the Constitution. The electronic court docket is accessible from [CJA's webpage for the lawsuit](#) – and the documents summing up the extraordinary posture of the case are my [December 19th affidavit demonstrating subject matter jurisdiction](#), my [February 23rd letter to the district judge](#), and the judge's [March 2nd so-ordered annotation](#).

I look forward to the Center's expert opinion and scholarship – the necessity of which is reflected by [CJA's webpage of "Outreach to Scholars"](#), posting not only my unresponded-to e-mails to the authors of the six law review articles you feature – Law Professors Ryan Williams, Fred Smith, Jr., Akhil Reed Amar, Deborah Merritt, Robert Natelson (*via* Heartland Institute), and private practitioner Jonathan Toren, Esq., but my unresponded-to e-mails to many, many other law professors and "knowledge institutions".

So that your featured six can belatedly furnish their expert opinions, with the law professors identifying whether, as it appears, they are intending to exclude the lawsuit from their scholarship and expect other scholars to do likewise, thereby concealing their violations of duties as scholars, lawyers, and citizens, I am cc'ing them.

I am available to answer questions and would welcome the opportunity to do so. Please let me hear from you soon.

Thank you.

Elena Sassower, Director
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