

From: elena@judgewatch.org
Sent: Monday, December 1, 2025 9:21 AM
To: 'karlan@stanford.edu'
Cc: 'mdunkle@law.stanford.edu'

Subject: **Scholarship, Amici, & Counsel 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: [cja-oct-29-2025-amended-complaint.pdf](#)

TO: [Stanford Law School Professor & Constitutional Scholar Pamela S. Karlan](#)

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

As you are Stanford Law School's Kenneth and Harle Montgomery Professor of Public Interest Law and a constitutional scholar, I am writing to alert you to a major federal lawsuit that CJA and I have brought on our own behalf and "*and on behalf of the People of the State of New York & the Public Interest*" against The New York Times and 33 other press defendants, seeking to establish judicial recognition of causes of action for "journalistic fraud" and "institutional reckless disregard for truth".

Above-attached and here-linked is the [October 29, 2025 amended verified complaint](#) whose first paragraph reads:

"Pursuant to Article 4, §4 of the United States Constitution, 'The United States shall guarantee to every State in this Union a Republican Form of Government...,' and the First Amendment to the Constitution pertaining to the press, as explicated by federal caselaw...and the First Amendment's guarantee of 'the right of the people...to petition the Government for a redress of grievances', and the further guarantees of the Fifth Amendment^{fn} and the Fourteenth Amendment, §1^{fn} to every 'person' of 'due process of law' and 'the equal protection of laws', plaintiffs seek declaratory relief and compensatory, presumed, and punitive damages against defendants for their knowingly false, 'fake news', corruption-abetting, election-rigging journalism, concealing and enabling the destruction of constitutional, lawful governance in New York State, culminating in corrupt candidates running on the 2025 election ballots – and, in particular, for New York City mayor, for New York City public advocate, for Manhattan borough president, for Manhattan district attorney, for Brooklyn district attorney, and to be district attorneys in approximately a dozen other counties throughout the state – and their election." (underlining added).

In addition to furnishing the lawsuit to you for your scholarship and teaching, I would appreciate discussing it with you and exploring whether you would be interested in participating as an *amicus curiae* or as paid counsel to CJA, which, because I am a non-lawyer, I cannot represent. I believe the lawsuit to be a summary judgment case, as there is NO defense to it factually or legally. The SOLE issue is the magnitude of compensatory, presumed, and punitive damages – a jury determination that will reasonably be many tens of billions of dollars.

The district court's irregular handling of the lawsuit, highlighted by my [November 19th letter to the district court judge](#), only reinforces this – as does my [drafted responding affidavit, for submission in January, disposing, at the outset, and before defendants are even served](#), of a subject matter jurisdiction defense of standing.

If you are unable to participate in the lawsuit, I would be grateful for your recommendations of other constitutional law scholars and attorneys – or, better yet, your forwarding this e-mail to them, directly, so that no time is wasted in putting together a crackerjack legal team for what is clearly monumental and fundamental to self-governance and “a Republican Form of Government”.

In that regard, I note that you were credited by then Stanford Law School student Jacob M. Heller in his excellent June 2010 [Stanford Law Review](#) article “[Death by a Thousand Cuts: The Guarantee Clause Regulation of State Constitutions](#)”. I have googled to find Mr. Heller, but without success. Do you have any contact information for him?

Thank you.

Elena Sassower, Director
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