

From: elena@judgewatch.org
Sent: Tuesday, December 23, 2025 11:14 AM
To: 'jddmdjd@web-access.net'
Cc: 'jackcashill@yahoo.com'; 'jtaylor@heartland.org'; 'jlakely@heartland.org'; 'jhaskins@heartland.org'; 'dkendal@heartland.org'; 'TBenson@heartland.org'; 'skarnick@heartland.org'; 'JMcPherrin@heartland.org'; 'ctalgo@heartland.org'; 'csholty@heartland.org'; 'wdavis@heartland.org'

Subject: **The People Fight Back vs Media Lies: Federal lawsuit vs The NYT & 33 other press defendants to establish judicial recognition of causes of action for "journalistic fraud" and "institutional reckless disregard for truth"**

Attachments: [cja-oct-29-2025-amended-complaint.pdf](#);
[filed-12-19-25-affidavit.pdf](#)

TO: [John Dale Dunn, ESQ./The Heartland Institute](#)

I have just discovered your December 9th article "[Big media lies of the last three decades](#)" in the [American Thinker](#), and, upon googling you, discovered you are a policy advisor to [The Heartland Institute](#).

Below is my November 26th e-mail to The Heartland Institute about a federal lawsuit brought "*on behalf of the People of the State of New York & the Public Interest*" against [The New York Times](#) and 33 other media defendants, suing them for their "media lies" that have destroyed constitutional, lawful NYS governance, seeking billions of dollars in damages and judicial recognition of causes of action for "journalistic fraud" and "institutional reckless disregard for truth" – to which I have received no response.

As you are a lawyer, you are in a position to judge the lawsuit, which, as I stated in my e-mail to The Heartland Institute, I believe to be "[a summary judgment case, as there is NO defense to it factually or legally.](#)" Above-attached and here-linked is the [October 29th verified amended complaint](#) – and, additionally, my [December 19th affidavit](#) establishing subject matter jurisdiction, in response to an unprecedented *sua sponte* order to show cause by the federal district judge. What is your opinion, counselor – and what is the opinion of The Heartland Institute, herein cc'd, whose president is also a lawyer.

By copy of this e-mail to [Jack Cashill](#), whose most recent book [Empire of Lies: Big Media's 30-Year War on Truth, 1994-2024](#), your December 9th article reviewed, I thank him for his honest journalism – and request that he take the lead in reporting on this as yet unreported lawsuit to secure truth from the media, the success of which is essential to the preservation of our constitutional republic.

I am available to discuss the foregoing and answer questions – and would welcome the opportunity to do so.

Thank you.

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

Sent: Wednesday, November 26, 2025 4:39 PM

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Subject: Guarantee Clause of the U.S. Constitution -- & Federal Lawsuit vs The NYT & 33 Other Press Defendants Pursuant Thereto, involving the NYS Budget & their Rigging of Mamdani's NYC Mayoral Win

TO: [THE HEARTLAND INSTITUTE](#)

[President James Taylor, ESQ.](#)

[Executive Vice President/Communications Director Jim Lakely](#)

[Vice President of Policy Justin Haskins](#)

[Emerging Issues/Socialism Research Center Director Donald Kendal](#)

[Senior Policy Analyst Tim Benson](#)

[Senior Fellow S. T. Karnick](#)

[Senior Policy Analyst/Research Fellow Jac McPherrin](#)

[Editorial Director/Socialism Research Fellow Christopher Talgo](#)

[Government Relations Director Cameron Sholty](#)

This follows my conversation earlier this afternoon with your excellent [Director of Administration Wanda Davis](#), who endeavored to assist me in locating an e-mail address for former Montana University Law Professor Robert Natelson, who wrote a [2002 law review article on the U.S. Constitution's guarantee clause, Article IV, §4](#). His website contains a [webpage with his bio](#) that at the top states "Our American Constitution" and reads, at the bottom, "A project of the Heartland Institute". Ms. Davis could find no e-mail address for him. A google search reveals, as Ms. Davis discovered, that he is a [Senior Fellow in Constitutional Jurisprudence at the Federalist Society](#).

As I discussed with Mr. Davis, pursuant to the Constitution's guarantee clause, I and the non-partisan, non-profit citizens' organization [Center for Judicial Accountability, Inc. \(CJA\)](#), of which I am co-founder and director, brought a major federal lawsuit against [The New York Times](#) and 33 other press defendants, which, in view of the Heartland Institute's [focus areas of "budgets" and "Stopping Socialism"](#), some of its hundreds of scholars and policy experts will surely have an interest in, as well. As I explained to Ms. Davis, the lawsuit is about the press' total concealment that the massive, policy-filled New York State budget is "OFF THE CONSTITUTIONAL RAILS" – and chronicles how the corruption of NYS' three government branches, including "public protection" ethics and criminal authorities, which the press has also totally

concealed, has enabled capture by the left – and the rise of NYS Assemblyman Zohran Mamdani, whose election as NYC mayor they rigged.

Above-attached and here-linked is the [October 29, 2025 amended verified complaint](#) in the lawsuit, 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 scholarship, I am looking for *amicus curiae* participation in the lawsuit and for paid counsel to represent CJA, which, because I am a non-lawyer, I cannot represent. I believe the lawsuit is 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.

I would appreciate your review and forwarding this e-mail to relevant scholars and to organizations with which you coordinate, such as the Federalist Society and Hudson Institute, so that no time is wasted in putting together a crackerjack team of scholars and lawyers for what is monumental federal lawsuit, absolutely fundamental to self-governance by the People and “a Republican Form of Government”.

I am available to answer questions – and would welcome calls, no matter how early or late.

Thank you.

Elena Sassower, Director
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