

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CENTER FOR JUDICIAL ACCOUNTABILITY, Inc.  
and ELENA RUTH SASSOWER, individually and  
as director of the Center for Judicial Accountability, Inc.,  
*acting on their own behalf and on behalf of the People  
of the State of New York & the Public Interest,*

Plaintiffs,

-against-

LEGISLATIVE CORRESPONDENTS ASSOCIATION, Inc.,  
ALBANY TIMES UNION (Hearst Communications),  
THE NEW YORK TIMES (The New York Times Company),  
NEW YORK POST (News Corp),  
DAILY NEWS (Alden Global Capital),  
NEW YORK LAW JOURNAL (ALM),  
THE WALL STREET JOURNAL (News Corp),  
THE ASSOCIATED PRESS,  
BLOOMBERG NEWS (Bloomberg, L.P.),  
NEWSDAY (Newsday Media),  
BUFFALO NEWS (Lee Enterprises, Inc.),  
POLITICO (Axel Springer, SE),  
NEW YORK FOCUS,  
WNYC & its GOTHAMIST (NY Public Radio),  
WMHT (WMHT Educational Telecommunications),  
WNET/NY CHANNEL THIRTEEN (WNET Group),  
CITY & STATE (City & State NY, LLC.)  
THE CITY (City Report, Inc.),  
SPECTRUM NEWS & its NY1 (Charter Communications),  
CRAIG NEWMARK GRADUATE SCHOOL OF JOURNALISM  
OF THE CITY UNIVERSITY OF NEW YORK,  
NBC-NY CHANNEL 4 NEWS (Comcast Company),  
PIX-NY CHANNEL 11 NEWS (Mission Broadcasting, Inc., Nexstar Media),  
ProPUBLICA (ProPublica, Inc.),  
CBS-NY CHANNEL 2 NEWS & CBS NEWS (Paramount Corp.),  
THE FREE PRESS (Paramount Corp.),  
\* \* \*  
WINS NY RADIO 1010 (Audacy, Inc.),  
SCHNEPS MEDIA, LLC.,  
CRAIN'S NEW YORK BUSINESS (Crain Communications, Inc.),  
NEWSWEEK (Newsweek Publishing, LLC.),  
REUTERS (Thomson Reuters Corporation),  
CNN (Warner Bros. Discovery, Inc.),

**25-CV-8370**

**VERIFIED**  
**AMENDED COMPLAINT**  
**& Demand for Jury Trial**

FOX NEWS (News Corp),  
NEWSMAX (Newsmax, Inc.),  
WCNY (Public Broadcasting Council of Central New York, Inc.),  
*being representative of other New York & national media,*

Defendants.

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“‘The First Amendment goes beyond protection of the press..’...‘it is the right of the [public], not the right of the [media], which is paramount,’...for ‘without the information provided by the press most of us and many of our representatives would be unable to vote intelligently or to register opinions on the administration of government generally,’...”

*Cohen v. Cowles Media Co.*, 501 U.S. 663, 678 (1991), Justice Souter, writing in dissent with Justices Marshall, Blackmun, and O’Connor, citing cases culminating in *New York Times Co. v. Sullivan*, 376 U.S. 254, 278-279 (1964), cited in “*Journalistic Malpractice: Suing Jayson Blair and the New York Times for Fraud and Negligence*”, 14 *Fordham Intellectual Property, Media & Entertainment Law Journal* 1, footnotes 62 and 156 (2003).<sup>1</sup>

\* \* \*

## JURISDICTION & VENUE

1. Pursuant to Article IV, §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, including as above recited, 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<sup>2</sup> and the Fourteenth Amendment, §1<sup>3</sup> to every “person” of “due process of law” and “the equal protection

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<sup>1</sup> This Verified Amended Complaint is best read, not by paper copy, but electronically, as it is in that format that the included hyperlinks can be accessed. It is posted on Plaintiff Center for Judicial Accountability’s website at: <https://www.judgewatch.org/lawsuit-federal-vs-press/2026-filings/amended-complaint-oct-29-2025-signed-by-zerman.pdf>.

<sup>2</sup> “No person shall...be deprived of life, liberty, or property, without due process of law...”

<sup>3</sup> “...No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States, nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.”

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.

2. Jurisdiction is vested in this Court by [28 U.S.C. §1331](#), a case arising under the United States Constitution.

3. Venue is proper in the Southern District of New York under [28 U.S.C. §1391](#). The individual plaintiff lives in the district, the corporate plaintiff has its office in the district, and most of the defendants have principal offices in the district.

4. This Court is authorized to grant declaratory relief under the Declaratory Judgment Act, [28 U.S.C. §2201\(a\)](#) and [§2202](#), implemented through [Rule 57 of the Federal Rules of Civil Procedure](#).

5. For the convenience of the Court, a Table of Contents follows:

**TABLE OF CONTENTS**

<u>THE PARTIES</u> .....	4
<u>THE FACTUAL ALLEGATIONS</u> .....	34
1. The Rigging of NYC’s June 24, 2025 Primary Elections by NY’s ‘Fake News’ Press .....	34
2. And Now, <i>After</i> the NYC Primary Elections, Will the Press Report on Corrupt Candidates & Incumbents on the Ballot? .....	50

3. In a Last-Ditch Effort to Salvage the 2025 Elections & Prod Defendants to Discharge their Duties to the Voters, Plaintiffs Filed This Lawsuit on October 8, 2025 & Furnished Defendants with their Verified Complaint & October 16, 2025 Letter to the U.S. Attorney ..... 61

CAUSES OF ACTION ..... 67

First Cause of Action: Journalistic Fraud ..... 67

Second Cause of Action: Institutional Reckless Disregard for Truth ..... 75

Third Cause of Action: Defrauding Purchasers, Contributors, & Taxpayers ..... 77

Fourth Cause of Action: Conspiracy ..... 80

STATEMENT IN FURTHER SUPPORT ..... 81

PRAYER FOR RELIEF ..... 83

VERIFICATION & CERTIFICATION..... 87

\* \* \*

**THE PARTIES**

6. **Plaintiff CENTER FOR JUDICIAL ACCOUNTABILITY, Inc.** (hereinafter “CJA”) is a national, non-partisan, non-profit citizens’ organization, headquartered in White Plains, New York and incorporated in 1994 under the laws of the State of New York, owing its existence to the refusal of the press to report on judicial corruption and, specifically, the “throwing” of cases by fraudulent judicial decisions, at trial and appellate levels, upending all standards, and the corruption of the processes of judicial selection and discipline, without oversight by, and in collusion with, the other government branches.

(a) CJA’s website is [www.judgewatch.org](http://www.judgewatch.org) and it posts the primary-source, documentary evidence of the situation. This includes the records of CJA’s *own* lawsuits, “thrown” by fraudulent judicial decisions of trial and appellate courts:

“so totally devoid of evidentiary support as to render them unconstitutional under the Due Process Clause’ of the U.S. Constitution, *Garner v. State of Louisiana*, 368 U.S. 157, 163 (1961), *Thompson v. City of Louisville*, 362 U.S. 199 (1960), and, comparably, under Article I, §6 of the New York State Constitution”,<sup>4</sup>

the records of its *own* complaints to ethics and criminal authorities, dumped without investigation or simply ignored, its *own* testimony for and before public bodies about what has been going on, to which there has been no response – and its massive outreach to the press, which reported nothing – and rigged elections by enabling corrupt incumbents to run for re-election and for election to higher offices, and, over time, achieved, consistent with their bias, *via* the disablement of all safeguarding checks and balances, and without legislative due process, an increasingly hard-left takeover of state government, particularly through the budget.

(b) CJA’s massive outreach to the press, on which this federal lawsuit is based, is accessible from the website’s left side panel “[Press Suppression](#)”. It brings up a menu webpage whose full title is “Press Suppression, Protectionism, Blackballing, & Election-Rigging”. Beneath it is the quote: “*Without publicity, all other checks are insufficient; in comparison of publicity, all other checks are of small account*” by Jeremy Bentham (1748-1832) and, under it, the following:

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<sup>4</sup> Quoted from plaintiffs’ “[legal autopsy](#)”/analysis of the New York Court of Appeals’ [March 18, 2025 order](#) dismissing/denying their appeals of right in *CJA, et al. v. JCOPE, et al.* and *CJA, et al. v. Commission on Legislative, Judicial and Executive Compensation...Wilson, Zayas, et al.* (at p. 3) – reprising language that appears in all of plaintiffs’ “legal autopsy”/analyses of judicial decisions, spanning years – and in their appeal briefs, spanning years, also quoting:

“‘[A] plaintiff’s cause of action is valuable property within the generally accepted sense of that word, and, as such, it is entitled to the protections of the Constitution.’, *Link v. Wabash Railroad Co*, 370 U.S. 626, 646 (1962), U.S. Supreme Court Justice Hugo Black writing in dissent, with Chief Justice Earl Warren concurring.”

“Yes, Virginia --  
There really is a ‘FAKE NEWS MEDIA’ --  
& it election-rigs, flagrantly ‘[Yes, Virginia...](#)’

-- & PROVING THIS, RESOUNDINGLY, is  
CJA's below chronicling of how the press operates,  
going back to 1990 and our first beginnings...

1.

[SPECIAL TOPICS](#)

2.

[PAPER TRAILS -- BY PUBLICATION](#)

[JOURNALISTS BY NAME](#)

3.

[PAPER TRAILS -- CHRONOLOGICALLY SINCE 2011](#)

4.

[AND THE INSTITUTES OF JOURNALISM  
& "MEDIA SCHOLARSHIP"?](#)

(c) The “[Special Topics](#)” link brings up a menu webpage whose first “Special Topic” is “Championing the First Amendment”, which is what CJA did, prior to this federal lawsuit, by two lawsuits against the press for their *knowingly* false, corruption-abetting, election-rigging journalism: the first, [against The New York Times \(2006-2008\)](#), and the second, [against Gannett \(2010-2013\)](#), each “thrown” by fraudulent judicial decisions of New York state courts, at trial and appellate levels, as verifiable from the lawsuit records, posted on CJA’s website, in full.

(d) Established by the records of these lawsuits is that the cause of action for “journalistic fraud”, proposed as viable under the First Amendment by the 2003 law review article “[Journalistic Malpractice: Suing Jayson Blair and the New York Times for Fraud and Negligence](#)” – which each lawsuit expressly sought to establish as viable – is. So, too, a cause of action for “institutional reckless disregard for truth”, proposed by the 2004-2005 law review article “[Institutional Reckless](#)

*[Disregard for Truth in Public Defamation Actions against the Press](#)*”, also sought to be established by those lawsuits.

7. **Plaintiff ELENA RUTH SASSOWER** (hereinafter “SASSOWER”) is CJA’s co-founder and was its coordinator until January 2006, when she became its director. She is a citizen, elector, and taxpayer of the State of New York, residing in White Plains, within walking distance of the White Plains U.S. District Court for the Southern District of New York where this federal lawsuit is being commenced.

8. **Defendant LEGISLATIVE CORRESPONDENTS ASSOCIATION, Inc.** (hereinafter “LCA”) is a not-for-profit corporation whose physical office is the pressroom on the third floor of the Capitol, in Albany. Its membership is open to reporters assigned to cover the New York State Legislature – and entitles them to desks and other facilities.

(a) The LCA website has not been operational for years, but, according to a [2019 webpage](#) that is part of a [website owned by Kyle Hughes](#), who runs an entity called NYSNYS News,<sup>5</sup> Defendant LCA is “a bulwark for the 1st Amendment” and “traces its roots to the Albany Press Club formed in the 1880s”.

(b) Mr. Hughes posts a roster of LCA reporters on [www.nysnys.net](#). Among its current 57 listed reporters for 2025,<sup>6</sup> in addition to Mr. Hughes, are individuals identified as Defendant LCA’s president, “v-p”, secretary, and two co-treasurers, as well as a “LCA Press Room manager” having a “@nysenate.gov” e-mail address.

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<sup>5</sup> NYSNYS News is, according to its website, [www.nysnys.com](#), “the leading multimedia news source and database on NYS government” – an assertion also appearing at the top of the [www.nysnys.net](#) website posting the 2025 LCA roster of reporters.

<sup>6</sup> Of these, four are reporters for “NY State Watch”, whose website, [www.nystatewatch.net](#), describes it as “an unmatched combination of comprehensive data, analytical tools, real-time entry, broad-spectrum delivery, and experience” and that it “provides the most innovative lobbying tool to the legislative professionals of New York.” It does not appear to produce any publicly-accessible journalism.

(c) The direct link to CJA’s menu webpage of its decade and a half of e-mails to the roster of LCA reporters, including in 2025, is [here](#).

9. **Defendant ALBANY TIMES UNION** (hereinafter “TIMES UNION”), with six reporters listed on the 2025 LCA roster, is a major New York newspaper, located less than five miles from the Capitol.

(a) Its website is [www.timesunion.com](http://www.timesunion.com) and includes a “[Standards and Practices](#)” webpage, stating:

“A news organization’s credibility relies on a foundation of trust: trust that the newsroom will aggressively seek out the news and unapologetically relay it to the public; trust that it will report the news accurately, fairly and impartially; and trust that its journalists will conduct themselves professionally and ethically as they carry out the important charge of informing their communities.

Maintaining the trust of our readers is hard work, and requires zealous and scrupulous effort to perform our jobs with integrity and honesty, avoiding conflicts of interest – or the appearance of conflicts, whether personal or professional — that may call into question our credibility to report the news in a way that promotes the truth.

...

**Journalistic Practices:**

Honesty, fairness and accuracy are paramount. We strive to report the news as completely as possible, providing divergent viewpoints when it is appropriate and responsible to do so. When necessary, we will clarify how we know what we’ve reported as well as when facts may not be immediately clear.

...

**Fact checking**

It is up to each journalist to check their work for accuracy and to immediately inform editors of needed corrections. Furthermore, when you spot or learn of errors elsewhere in our publications, you should promptly bring them to the attention of editors...

We also owe it to our readers to avoid printing falsehoods...

The deliberate use of false information...is prohibited.

### Correcting errors

Transparency is essential to maintaining public trust, and when we make mistakes, we should correct them. ...

...

### Professional Conduct and Conflicts of Interest

It is imperative that journalists adhere to the principles of fair, truthful and accurate reporting of the day's news, regardless of subject and no matter the platform. We will inform the public about important issues and events in a manner that is upfront, transparent and professional. In doing this work, we must avoid conflicts of interest, both real and perceived, that could affect our audience's perception of the fairness, truth and accuracy of our news coverage. This does not mean we shy away from hard-hitting reporting, shining light on darkness, and challenging our readers with hard facts. But it does mean avoiding conflicts of interest and compensating for personal biases.

This is an ongoing exercise for all journalists, but a necessary one: Fair and honest reportage must involve an intelligent exchange of ideas and be based on indisputable facts, free of the journalist's ideology or personal conviction. To that end, every newsroom employee, regardless of job function, must avoid real or perceived conflicts. ... In conducting yourself as a journalist, consider the four principles laid out in the Society for Professional Journalists code of ethics: Seek truth and report it; minimize harm; act independently; be accountable and transparent."

(b) Defendant TIMES UNION is owned by [Hearst Communications](#), a privately held company, with 2024 revenue reported as [\\$13 billion](#).

(c) The direct link to CJA's menu webpage of its decades of interaction with Defendant TIMES UNION, including its 2025 e-mails, is [here](#).

10. **Defendant THE NEW YORK TIMES** (hereinafter "NYT"), with three reporters listed on the 2025 LCA roster, is America's preeminent newspaper, with a website, [www.nytimes.com](#), that makes it, [by far](#), America's highest circulation newspaper, with over 11 million subscribers.

(a) Headquartered in Manhattan, Defendant NYT is owned by [The New York Times Company](#), a publicly traded company, with 2024 revenue reported as [\\$2.59 billion](#). Its website, [www.nytc.com](#), opens with the words "We seek the truth and help people understand the world."

This is elaborated by a prominent homepage link to its “[Mission and Values](#)”.<sup>7</sup> The “Our Mission” repeats “We seek the truth and help people understand the world...” and the “Our Values” begins:

**“Independence** Over a hundred years ago, The Times pledged ‘to give the news impartially, without fear or favor, regardless of party, sect, or interests involved.’ That commitment remains true today: We follow the truth, wherever it leads.

**Integrity** The trust of our readers is essential. We renew that trust every day through the actions and judgment of all our employees – in our journalism, in our workplace and in public.”

and concludes with:

**Excellence** We aim to set the standard in everything we do. The pursuit of excellence takes different forms, but in every context, we strive to deliver the very best.”

(b) The [www.nytco.com](http://www.nytco.com) homepage additionally links to “[Journalism’s Essential Value](#)”,

which asserts:

“For more than a century, The New York Times has remained relentlessly committed to the journalistic practice of independence, pledging to cover the world ‘without fear or favor.’”

and states that “this long-standing commitment” is put “in today’s context” by an essay by NYT Publisher A.G. Sulzberger, published May 15, 2023 in Columbia Journalism Review.

(c) The essay highlights the definition of “the journalistic practice of independence” by enlarged text, including:

“Independence is the increasingly contested journalistic commitment to following facts wherever they lead. It places the truth—and the search for it with an open yet skeptical mind—above all else.”

“Independence calls for plainly stating the facts, even if they appear to favor one side of a dispute. And it calls for carefully conveying ambiguity and debate in the more

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<sup>7</sup> This same webpage is accessible from the top panel “Our Company”, *via* its dropdown “[About Us](#)”, from whose webpage there is a link for “[Our Standards and Ethics](#)”, containing a succession of links, such as to “[Ethical Journalism Guidebook](#): A handbook of values and practices for the News and Opinion departments”, “[Guidelines on Our Integrity](#): Additional ground rules on basic newsroom practices”, and “[Our Code of Conduct](#): The standards by which all Company employees are expected to conduct themselves”.

frequent cases where the facts are unclear or their interpretation is under reasonable dispute, letting readers grasp and process the uncertainty for themselves.”

According to Publisher Sulzberger, there are “many outstanding news organizations that exemplify [this] type of independent journalism”. In addition to Defendant NYT, he mentioned “the *Wall Street Journal* to wire services like the Associated Press and Bloomberg News to broadcasters like...NPR to digital publishers like *ProPublica* and *Politico*” – all herein made defendants, including by reason thereof.<sup>8</sup>

(d) Two years later, on May 13, 2025, Defendant NYT would link to this [Columbia Journalism Review essay](#) in publishing, under the title “*A Free People Need a Free Press*”, a commencement address delivered by Publisher Sulzberger. The link did not identify the essay, but himself “[as a champion of independent journalism](#)” and was followed, in the next paragraph, by the assertion:

“Our loyalty is to the truth and to a public that deserves to know it. That is the distinct role that independent news organizations like The Times play in our democracy.”

(e) The direct link to CJA’s menu webpage of its decades of interaction with Defendant NYT, including its 2025 e-mails, is [here](#).

11. **Defendant NEW YORK POST** (hereinafter “NY POST”), with one reporter listed on the 2025 LCA roster, is a tabloid newspaper, “America’s oldest continuously published newspaper”, with a print circulation that is [ninth in the nation](#) and a website, [www.nypost.com](#).

(a) Its website links to its “[Editorial Standards](#)”, stating that Defendant NY POST is:

“committed to accurate and aggressive reporting...

We aim to be first, but not at the expense of being right. Every fact is checked for accuracy and our editors and producers review stories for balance and fairness before publication.

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<sup>8</sup> NPR, whose website promises “[Free and independent journalism from...a network of over 200 local newsrooms](#)” is here sued *via* its New York member station WNYC and its Gothamist.

We put a premium on investigative, enterprise, exclusive and unique reporting.

The news team offers comprehensive and deeply researched coverage, utilizing every available resource and journalistic tool. We base our reports, whenever possible, on original interviews, observation, court documents, government data, information gleaned via federal and state Freedom of Information requests, police and official reports, and on-site reporting.”

(b) Defendant NY POST is owned by News Corp, a publicly traded company, headquartered in Manhattan, whose 2025 revenue is reported as [\\$8.45 billion](#).

(c) The News Corp website, [www.newscorp.com](http://www.newscorp.com), opens with the words “Passionate. Principled. Purposeful.”, followed by the sentence: “News Corp delivers authoritative and engaging content from some of the world’s most trusted brands.” Its other “most trusted brands” include Defendant WALL STREET JOURNAL and Defendant FOX NEWS.

(d) The direct link to CJA’s menu webpage of its decades of interaction with Defendant NY POST, including its 2025 e-mails, is [here](#).

12. **Defendant DAILY NEWS**, which, up until 2024, had at least one reporter listed on the LCA roster, is a tabloid newspaper.

(a) Its website is [www.nydailynews.com](http://www.nydailynews.com) and, according to its “[About Us](#)” webpage, Defendant DAILY NEWS’ “mission is to deliver the truth every day” and is “one of the most trusted brands in New York.”

(b) Defendant DAILY NEWS is owned by Daily News Enterprises, headquartered in Manhattan, itself owned by the hedge fund [Alden Global Capital](#), also headquartered in Manhattan, whose assets under management are reported to be [\\$1.04 billion](#).

(c) The direct link to CJA’s menu webpage of its decades of interaction with Defendant DAILY NEWS, including its 2025 e-mails, is [here](#).

13. **Defendant NEW YORK LAW JOURNAL** (hereinafter “NYLJ”) is a printed newspaper, whose front page and masthead read “Serving the Bench and Bar Since 1888”, with a website at [www.nylj.com](http://www.nylj.com). It reports on significant litigations in the New York courts, “court administration, ...elected officials, government offices, law schools, ...and bar associations”, with a reporter based in Albany, listed on the LCA roster.

(a) Defendant NYLJ is owned by ALM (American Lawyer Media), whose website, [www.alm.com](http://www.alm.com), states, on its “Company” webpage, that it is “guided by a compelling vision: be the world’s most trusted information, data, intelligence and content company supporting both the practice and business of law”, which it “work(s) hard to live and achieve every day” – and that it has “A Legacy of Trust”.

(b) The direct link to CJA’s menu webpage of its decades of interaction with Defendant NYLJ, including its 2025 e-mails, is [here](#).

14. **Defendant WALL STREET JOURNAL** (hereinafter “WSJ”), owned by News Corp, is the [largest print circulation](#) newspaper in the United States and, until January 2025, had one reporter listed on the LCA roster.

(a) Its website is [www.wsj.com](http://www.wsj.com) and its “About Us” webpage has this to say about itself:

“We provide facts, data and information, not assertions or opinions. We believe in full separation between News and Opinion. We pursue exclusive stories, with the goal of breaking all important scoops in our core areas; deep insight and analysis; and actionable intelligence—being the first read and the last word. We have a unique, trusted responsibility as a watchdog and custodian. ...

...

We have an important social purpose. Society benefits from a common set of verifiable facts... Providing those facts informs debate and contributes to the greater good.

#### **Newsroom Standards & Ethics**

Our adherence to the highest and most rigorous [standards of fairness and integrity](#) have enabled The Wall Street Journal to flourish for more than 130 years.

Our reputation is our most cherished possession. We strive to be a model for ethical, fact-based, ambitious news reporting.

This dedication is a central reason we are so trusted by readers. National surveys repeatedly rank The Wall Street Journal among the most trusted news organizations in the U.S. on both sides of the political divide. Readers trust us because they see us as fair, accurate and impartial. There are many journalistic practices that are the bedrock of this trust.

Our journalists are committed to the most ethical conduct in pursuing our work and aim to uphold the legacy of integrity above reproach, including adherence to the [Dow Jones Code of Conduct](#). We aspire to honest and ethical conduct in all iterations with colleagues, competitors, sources, subjects and our readers. We avoid the perception of bias as rigorously as we do any real bias.” (hyperlinking in the original).

(b) The direct link to CJA’s menu webpage of its decades of interaction with Defendant [WSJ](#), including its 2025 e-mails, is [here](#).

15. **Defendant THE ASSOCIATED PRESS** (hereinafter “AP”), with two reporters listed on the 2025 LCA roster, is a not-for-profit corporation, headquartered in Manhattan, reported to have revenue of [over \\$500 million](#).

(a) Defendant AP’s motto appears to be “Advancing the Power of Facts”, as this is what is at the bottom of each page of its website, [www.ap.org](#), with the bottom of the homepage also including a fuller description:

“The Associated Press is an independent global news organization dedicated to factual reporting. Founded in 1846, AP today remains the most trusted source of fast, accurate, unbiased news in all formats and the essential provider of the technology and services vital to the news business. More than half the world’s population sees AP journalism every day.”

(b) The bottom of Defendant AP’s homepage additionally contains a link for “[AP News Values and Principles](#)” – and the webpage it brings up states:

“We are The Associated Press. We have a long-standing role setting the industry standard for ethics in journalism. It is our job – more than ever before – to report the news accurately and honestly” and

“Journalists at The Associated Press utilize a set of standards and practices that safeguards AP stories from bias and inaccuracies.”

The “[AP News Values and Principles](#)” webpage also posts a pdf of “[News Values and Principles](#)”, stating:

“We abhor inaccuracies, carelessness, bias or distortions. We will not knowingly introduce rumor or false information into material intended for broadcast or publications ...

When mistakes are made, they must be corrected – fully, quickly, *transparently* and ungrudgingly.

...

It is the responsibility of every one of us to ensure that these standards are upheld. Any time a question is raised about any aspect of our work, it should be taken seriously.”

(c) Defendant AP’s website additionally includes a “[DONATE](#)” webpage to “help The Associated Press continue its mission to advance the power of fact-based journalism”.

(d) The direct link to CJA’s menu webpage of its decades of interaction with Defendant AP, including its 2025 e-mails, is [here](#).

16. **Defendant BLOOMBERG NEWS** is “an international news agency headquartered in New York City”, owned by [Bloomberg L.P.](#), a privately held company with 2024 revenue reported as [\\$15 billion](#).

(a) Until last month, Defendant BLOOMBERG NEWS had one reporter listed on the LCA 2025 roster of reporters, now listed as vacant.

(b) Defendant BLOOMBERG NEWS’ website, [www.bloomberg.com](#), does not appear to have any webpages with statements about the integrity of its journalism and compliance with ethics codes, except, seemingly, on its solicitation webpage for [Bloomberg Law](#), stating that it is “the only platform you need to access trusted news...” and that it is “Backed by Bloomberg’s reputation for quality”.

(c) The direct link to CJA’s menu webpage of its years of e-mails to Defendant BLOOMBERG NEWS, including in 2025, is [here](#).

17. **Defendant NEWSDAY** is a newspaper, primarily serving the Nassau/Suffolk counties of New York, with two reporters listed on the 2025 LCA roster, and ranks [tenth in the nation](#) as far as paid subscribers. It is owned by Newsday Media, headquartered in Nassau County, and has revenue reported as [\\$246.5 million](#).

(a) Defendant NEWSDAY’s website, [www.newsday.com](http://www.newsday.com), states on its “[About Us](#)” webpage, as a “Message from Our Owner”, that it engages in “*tough, impartial reporting*”, “*renowned, in-depth reporting on the issues that matter most to Long Islanders.*”, is “your trusted eye on Long Island”, “a watchdog that protects you with deep investigations into government corruption and waste...”, and “understands that truth is power — and that power belongs in your hands.”

(b) The direct link to CJA’s menu webpage of its decades of interaction with Defendant NEWSDAY, including its 2025 e-mails, is [here](#).

18. **Defendant BUFFALO NEWS** is a daily newspaper, serving the Buffalo/Niagara counties of New York, with one reporter on the 2025 LCA roster. It is owned by Lee Enterprises, a publicly-traded media company, based in Davenport, Iowa, with 2024 revenue reported as [\\$611.4 million](#).

(a) Defendant BUFFALO NEWS’ website is [www.buffalonews.com](http://www.buffalonews.com) – and it appears to have no webpage about itself or stating anything about the integrity of its news reporting. However, the Lee Enterprises website, [www.lee.net](http://www.lee.net), does. Its “[About Us](#)” webpage states “Lee Enterprises is a leading provider of high quality, trusted, local news and information”. It has a “[Principles for Quality Journalism](#)” webpage that begins, as follows:

“At Lee Enterprises, we believe quality journalism is central to our company’s success.

We believe our fundamental duty is to watch out for our communities through exercise of our First Amendment rights and responsibilities.

We believe our newspapers must pursue the truth and must maintain independence from undue influence by government, advertisers or other powerful forces in our communities.

In order to uphold these core convictions, each Lee newspaper will:

- Be accurate.
- Be fair.
- Be timely.
- Provide depth and continuity in coverage that can't be found from other local sources.
- Set and meet high standards for quality reporting....”

(b) The direct link to CJA’s menu webpage of its decades of interaction with Defendant BUFFALO NEWS, including its 2025 e-mails, is [here](#).

19. **Defendant POLITICO** is a digital journalism company, purchased in 2021 for reportedly \$1 billion dollars by [Axel Springer SE](#), the largest media publishing company in Europe, with reported revenue of [\\$4 billion](#). It has five reporters listed on the 2025 LCA roster.

(a) Defendant POLITICO’s website, [www.politico.com](http://www.politico.com), asserts, on its “[About Us](#)” webpage, its value to government officers, CEOs, advocacy leaders, and democracy:

“We deliver the straightforward facts and clear-eyed analysis they need to navigate the most complex political landscape of our lifetimes.

...

We tell the story of how power really works by explaining who wields it and how they plan to exercise it, connecting dots others miss and delivering scoops from sources others don’t even know exist.

...

Axel Springer is dedicated to shaping the future of journalism in the free world, believing that a free and informed society is essential to democracy.”

(b) By an [August 26, 2025 announcement](#), the NYC Campaign Finance Board announced that Defendant POLITICO would be a media partner for Defendant NBC, a broadcast sponsor for the first NYC mayoral election debate.

(c) The direct link to CJA’s menu webpage of its decade and a half of interaction with Defendant POLITICO, including its 2025 e-mails, is [here](#).

20. **Defendant NEW YORK FOCUS** (hereinafter “NY FOCUS”), publishes digital journalism on its website, [www.nysfocus.com](http://www.nysfocus.com), and has nine reporters listed on the 2025 LCA roster.

(a) Defendant NY FOCUS’ logo asks “Who runs New York?” and its “About Us” webpage states that it is “an independent nonprofit newsroom investigating power in the Empire State”, publishing “in-depth journalism that explains how the state really works”, is “the state’s only nonprofit statewide newsroom”, and that “Albany is the state’s center of power but receives a fraction of the scrutiny it warrants.” Its “Donate” webpage, under a heading “Help Us Uncover How Power in New York Really Works”, states, “Join us in our work to rebuild local journalism as a pillar of democracy in New York.” It further states, on its “Ethics & Funders” webpage, that it is “a member of the Institute for Nonprofit News and subscribe(s) to standards of editorial independence adopted by that organization.”

(b) The direct link to CJA’s menu webpage of its five years of e-mails to Defendant NY FOCUS, including in 2025, is [here](#).

21. **Defendant WNYC** and its **GOTHAMIST**, the latter identifying itself as “A non-profit newsroom powered by WNYC”, is an NPR-member station and part of New York Public Radio, a non-profit organization, headquartered in Manhattan. It currently has two reporters listed on the 2025 LCA roster, down from the three reporters it had until August.

(a) Defendant WNYC “reaches more than one million listeners each week and has the largest public radio audience in the United States.” Its website, [www.wnyc.org](http://www.wnyc.org), describes Defendant WNYC as “New York City’s premier public radio station” and “home for independent journalism”. Its “[Editorial Policy and Guidelines](#)”, accessible from its “[Values Page](#)”, states that WNYC is an “impartial source of content” (at p. 4) and that:

“binding all the work we do is the trust that listeners, readers and viewers have in us – a trust that has been earned over decades of our existence...

First, we endeavor to keep our newsgathering production, and presentation free from any conflicts or undue influences that result in content that is inaccurate, misleading, biased, or unfair.

Second, we endeavor to be transparent in our work, revealing potential conflicts where they may exist, admitting our limitations and owning up to mistakes when we make them and correcting the underlying causes.

Employees are expected to pursue their editorial work and conduct themselves in a manner that produces content that is accurate, unbiased, fair and transparent and fosters the continuing trust of the audiences who rely on NYPR for information.” (at p. 1);

(b) Defendant WNYC’s posted “[Public Media Code of Integrity](#)” “[c]ommit(s) to accuracy and integrity in the pursuant of facts about events, issues, and important matters that affect communities and people’s lives”. Its “[Donate](#)” webpage states:

“A healthy democracy requires a thriving public sphere, where information flows freely...New York Public Radio is community-powered media. Please help us keep rigorous journalism...accessible to all.”

(c) By an [August 26, 2025 announcement](#), the NYC Campaign Finance Board announced that Defendant WNYC and its GOTHAMIST would be a media partner to Defendant SPECTRUM NEWS/NY1, a broadcast sponsor for three NYC election debates: for public advocate, for comptroller, and for mayor.

(d) The direct link to CJA’s menu webpage of its years of e-mails to Defendant WNYC, including in 2025, is [here](#), its even more years of e-mails to GOTHAMIST, including in 2025, is [here](#), and its decades of e-mails with the constellation of NPR/PBS-affiliated public radio stations and websites in New York, which, since January 2024, have constituted themselves as the New York Public News Network, is [here](#).

22. **Defendant WMHT** is a public media television station serving Albany and surrounding counties as a member of PBS. Its website is [www.wmht.org](http://www.wmht.org).

(a) It has three reporters listed on the 2025 LCA roster, one of whom is [managing editor and host of New York NOW](#), which airs “on all public television and radio stations across the state of New York in addition to being aired online and in a podcast format”, billed on PBS’ website as “New York State’s Emmy Award-winning, in-depth, public affairs program, featuring news, interviews and analysis from the Capitol in Albany...”. New York NOW’s “multimedia journalist” is its other LCA listed reporter.

(b) The direct link to CJA’s menu webpage of its decades of interaction with Defendant WMHT and New York NOW, including its 2025 e-mails, is [here](#).

23. **Defendant WNET** is “the nonprofit parent company of New York’s Channel THIRTEEN – America’s flagship PBS station”, serving the New York City metropolitan area.

(a) The direct link to CJA’s menu webpage of its interaction with Defendant WNET, including its 2025 e-mails, is [here](#).

24. **Defendant CITY & STATE** is a domestic limited liability company, with two reporters listed on the 2025 LCA roster.

(a) Operating primarily as a website, [www.cityandstateny.com](http://www.cityandstateny.com), Defendant CITY & STATE identifies itself as:

“the premier media organization dedicated to covering New York’s local and state politics and policy. Our in-depth, non-partisan coverage serves New York’s leaders every day as a trusted guide to the issues impacting New York. We offer round-the-clock coverage through our award-winning commentary and analysis, weekly publications, daily e-briefs, events, podcast interviews and more.”

It describes its [subscription](#) print magazine as “The premier weekly publication that dedicates its coverage to everything politics in New York”.

(b) The direct link to CJA’s menu webpage of its decade and a half of e-mails to Defendant CITY & STATE, including in 2025, is [here](#).

25. **Defendant THE CITY**, headquartered in Manhattan, exists as the digital website [www.thecity.nyc](http://www.thecity.nyc). It describes itself as “an independent, nonprofit news organization”, with “Quality journalism”, “supported by [] readers, individual donors, foundations and corporate sponsors”, whose “giving enables us to bring the highest standards to covering New York City.”

(a) Its webpages highlight, in enlarged font, that it:

“serves the people of New York through independent journalism that holds the powerful to account, deepens democratic participation and helps make sense of the greatest city in the world”

and, additionally, that it is “dedicated to rigorous accountability reporting with a focus on systemic issues, the real-world impact of policy choices and the conduct of those who exercise power”, “hard-hitting reporting”, where “wrongdoing is called out and halted”. Its “[DONATE](#)” webpage repeats that it “hold(s) the powerful to account”.

(b) Its “[Guidelines and Ethics](#)” webpage further states:

“Our work is guided by a Code of Ethics, which draws inspiration (and in some cases, specific language) from [The Texas Tribune](#), [The Marshall Project](#), [ProPublica](#) and [Society of Professional Journalists](#), among others.

Here’s the short version: We’re a nonpartisan outlet dedicated to truth, accuracy and fairness. We don’t play favorites for financial or any other reasons – we have no agenda, hidden or otherwise. We know our credibility – and our impact – depends on practicing what we preach.” (hyperlinking in the original).

(c) By an [August 26, 2025 announcement](#), the NYC Campaign Finance Board announced that Defendant THE CITY would be a media partner to Defendant SPECTRUM NEWS/NY1, a broadcast sponsor for three NYC election debates: for public advocate, for comptroller, and for mayor.

(d) The direct link to CJA’s menu webpage of its years of e-mails to Defendant THE CITY, including in 2025, is [here](#).

26. **Defendant SPECTRUM NEWS** are cable news television stations, with websites, owned by [Charter Communications](#), a publicly traded company, headquartered in Stamford, Connecticut, with 2024 revenue reported as [\\$55.09 billion](#). It has seven reporters listed on the 2025 LCA roster.

(a) Defendant SPECTRUM NEWS’ NY1 is its New York City station. Its website, [www.ny1.com](#), states on its “[About Us](#)” webpage:

“Spectrum News NY1 is a local news network focused on providing unbiased coverage of New York City. With an objective, character-driven approach to news and journalists who have deep connections to their communities, Spectrum News NY1 focuses on in-depth coverage of issues that matter most to New Yorkers, including politics... Spectrum Networks carry distinct, comprehensive and exclusive local programming, and all employees adhere to common set of journalistic [standards and practices](#)...” (hyperlinking in the original).

(b) By an [August 26, 2025 announcement](#), the NYC Campaign Finance Board announced that Defendant SPECTRUM NEWS/NY1 would be a broadcast sponsor for three NYC election debates: for public advocate, for comptroller, and for mayor.

(c) The direct link to CJA’s menu webpage of its decades of interaction with Defendant SPECTRUM NEWS/NY1, including its 2025 e-mails, is [here](#).

27. Defendant CRAIG NEWMARK GRADUATE SCHOOL OF JOURNALISM OF THE CITY UNIVERSITY OF NEW YORK (hereinafter “CUNY GRADUATE J-SCHOOL”, located in Manhattan, is one of 25 institutions comprising CUNY, “the largest urban university system in the United States”. It is governed by a “board of trustees composed of 17 members, ten of whom are appointed by the governor of New York ‘with the advice and consent of the senate,’ and five by the mayor of New York City ‘with the advice and consent of the senate’” and is massively funded within the state budget.

(a) Defendant CUNY GRADUATE J-SCHOOL has a “Code of Ethics” webpage, which, in enlarged font states:

“Our society grants journalists and the news media enormous freedom and privilege. With that freedom comes great responsibility.”

The continuation then reads:

“The Craig Newmark Graduate School of Journalism at the City University of New York expects all members of its community to act according to the highest ethical standards of academia and the journalism profession.

Many news organizations require employees to sign codes of ethics. Because the Journalism School is preparing students to enter the media world and because integrity is so important to our profession, we too shall require all students to read, sign and heed this Code of Ethics. Students who violate this Code may face appropriate sanctions, up to and including expulsion, in accordance with CUNY Bylaws and the CUNY Policy on Academic Integrity and professional journalism standards.

#### **BASIC PRINCIPLES**

The duty of journalists is to inform the public in ways that promote understanding of past or current or upcoming events and the workings of a democratic society. To be credible and trustworthy, we seek truth in an unbiased way, always striving for a fair and comprehensive account of events and issues.

It is not possible to codify all good behavior. But we should subject everything we do to the twin tests of honesty and fairness – and remain accountable for the results. ...”

(b) In addition to a course entitled “[Covering City Government and Politics](#)”, which is mandated as part of its “Local Accountability Reporting concentration”, Defendant CUNY GRADUATE J-SCHOOL has a program in “[Business and Economics Reporting](#)”. It also runs a “[NYCITY NEWS SERVICE](#)”, where its “best students get published”.

(c) By an [August 26, 2025 announcement](#), the NYC Campaign Finance Board announced that Defendant CUNY GRADUATE J-SCHOOL would be a partner to Defendant SPECTRUM NEWS/NY1, a broadcast sponsor for three NYC election debates: for public advocate, for comptroller, and for mayor.

(d) The direct link to CJA’s menu webpage of plaintiffs’ years of interaction with Defendant CUNY GRADUATE J-SCHOOL, including its 2025 e-mails, is [here](#).

28. **Defendant NBC – NY CHANNEL 4 NEWS** (hereinafter “NBC 4”) is part of NBC Owned Television Stations, headquartered in Manhattan, owned by Comcast Corporation, a publicly traded company, headquartered in Philadelphia, whose 2024 revenue is reported to be [\\$123.7 billion](#).

(a) Defendant NBC 4’s website, [www.nbcnewyork.com](#), has a “[News Standards](#)” webpage, stating, in pertinent part:

“At [NBC 4 New York](#), we aim to create journalism that is trustworthy and transparent, and cover stories that matter to the tri-state region and the many audiences who live here. Our newsroom follows certain standards and principles when investigating, writing and building our news coverage to ensure accuracy, fairness and quality.

**Accuracy and Fairness**

Accuracy and fairness are fundamental principles of journalism. As we gather information and images from various sources, we make every effort to verify and ensure both.

Accuracy requires that we ensure all facts are correct and presented in proper context. ...”

### Corrections Policies

If we learn that our reporting is flawed or misleading, we take prompt action and clearly disclose the mistake to our audience. Owning up to and correcting our errors is essential to maintaining your trust.” (hyperlinking in the original).

(b) By an [August 26, 2025 announcement](#), the NYC Campaign Finance Board announced that Defendant NBC 4 would be a broadcast sponsor for the first mayoral election debate.

(c) Plaintiffs’ e-mails to Defendant NBC 4 are included on CJA’s webpage entitled “[Alerting the Debate Organizers, etc.](#)”.

29. **Defendant PIX – NY CHANNEL 11 NEWS** (hereinafter “PIX11”) is headquartered in Manhattan, with a website at [www.pix11.com](#). It is owned by [Mission Broadcasting Inc.](#), whose revenue is reported to be [\\$51.9 million](#), and is operated by [Nexstar Media Group, Inc.](#), with reported 2024 revenue of [\\$5.4 billion](#).

(a) Nexstar’s website, [www.nexstar.tv](#), states its “[Mission and Values](#)” to include “trusted news” and “High-quality Programming, including Fact-Based Journalism”.

(b) By an [August 26, 2025 announcement](#), the NYC Campaign Finance Board announced that Defendant PIX11 would be a broadcast sponsor for two NYC election debates: for mayor and for comptroller.

(c) Plaintiffs’ e-mails to Defendant PIX11 are included on CJA’s webpage entitled “[Alerting the Debate Organizers, etc.](#)”.

30. **Defendant ProPUBLICA** is “a nonprofit investigative journalism organization based in New York City”, whose website is [www.propublica.org](#).

(a) According to its “[About Us](#)” webpage, its “Mission” is:

*“To expose abuses of power and betrayals of the public trust by government, business, and other institutions, using the moral force of investigative journalism to spur reform through the sustained spotlighting of wrongdoing.*

...

We are committed to uncovering the truth, no matter how long it takes or how much it costs...

...

ProPublica was founded in 2007–2008 with the belief that investigative journalism is critical to our democracy. Our [staff](#) remains dedicated to carrying forward the important work of exposing corruption, informing the public about complex issues, and using the power of investigative journalism to spur reform.” (hyperlink in the original).

(b) The website also features a “[Code of Ethics](#)” webpage, stating, in pertinent part:

“It is an essential prerequisite for success in the news business that we tell the truth, and that our readers believe us to be telling them the truth. If we are not telling them the truth — or even if they, for any valid reason, believe that we are not — then ProPublica cannot succeed. ProPublica will suffer, for example, if our readers cannot assume that:

- Our facts are accurate and fairly presented.
- Our analyses represent our best independent judgments rather than our preferences or those of our sources.
- There are no hidden agendas in any of our journalistic undertakings.

...

No story is fair if it omits facts of major importance or significance. Fairness includes completeness.

No story is fair if it misleads or deceives the reader. Fairness includes honesty — leveling with the reader.”

(c) Its “[Donate](#)” webpage states, in enlarged font, “**Who Owns ProPublica? No one.**”,

it then continues:

**“Keep it free for everyone.**

Unlike many media outlets, we don’t have corporate owners, advertisers or shareholders pulling the strings. ProPublica is an independent, nonprofit newsroom. That means our only obligation is to the truth.

Our journalism exists to hold power accountable, expose injustices and drive real-world change. Over the years, our reporting has led to new laws being passed, vulnerable communities getting expanded protections and people in power resigning.

This model only works because readers like you choose to fund it. **Join more than 80,000 members who believe the news should belong to the people — not to megacorporations or political interests. ...**” (bold in the original).

(d) The direct link to CJA’s menu webpage of its decade-plus of interaction with Defendant ProPUBLICA, including its 2025 e-mails, is [here](#).

31. **Defendant CBS – NY CHANNEL 2 NEWS** (hereinafter “CBS 2 NEWS”) is part of the [CBS network](#), headquartered in Manhattan, and owned by [Paramount](#).

(a) Defendant CBS 2 NEWS’ website, [www.cbsnews.com/newyork](http://www.cbsnews.com/newyork), does not appear to post any statement or materials pertaining to the integrity of its news, or about filing requests for corrections or complaints. Likewise, the CBS NEWS’ website, [www.cbsnews.com](http://www.cbsnews.com).

(b) The Paramount website, [www.paramount.com](http://www.paramount.com), does have a “[Missions and Values](#)” webpage, but it is not geared to its news journalism.

(c) At an August 2025 news conference following the purchase of Paramount by David Ellison, he said, as Paramount’s new chair, that he wanted the CBS News division to be “fact-based and truth-based” – and that “Of course we believe in the independence of journalism, we believe in basically being in the trust business, we believe in being in the truth business.”

(d) [On October 8, 2025, Paramount announced the appointment of an ombudsman for CBS News](#) – with Paramount’s president stating “At a time when trust in media is more important than ever, this new role reinforces our commitment to truth, trust, and accountability.”

(e) The direct link to CJA’s webpage of its e-mails to Defendant CBS 2 NEWS and CBS NEWS, pertaining to the 2025 NYC elections, is [here](#).

32. **Defendant THE FREE PRESS** is an “Internet-based media company”, headquartered in Manhattan, founded by Bari Weiss. When googled, a shorthand motto appears with its name “Honest. Independent. Fearless.”

(a) Its website is [www.thefp.com](http://www.thefp.com) and its “[About](#)” webpage, states that it is:

“built on the ideals that once were the bedrock of great journalism: honesty, doggedness, and fierce independence. We publish investigative stories and provocative commentary about the world as it actually is – with the quality once expected from the legacy press, but the fearlessness of the new.

Originally called Common Sense, we focus on stories that are ignored or misconstrued in the service of an ideological narrative.”

Among its “Values”, its first is “*Honesty*”:

We seek and report the truth. We tell it plainly when we uncover it, even when it’s politically inconvenient.”

Further values include “*Excellence*”:

“We take tremendous pride in being best-in-class. We have faith that success will follow if we relentlessly focus on delivering an excellent product every day to our audience.”

(b) On October 6, 2025, it was announced that Defendant THE FREE PRESS had been purchased by Paramount, reportedly for \$150 million, with Ms. Weiss becoming editor-in-chief at Defendant CBS NEWS, while continuing as editor-in-chief of Defendant THE FREE PRESS. The [CBS News press announcement](#) quoted Mr. Ellison as saying:

“Bari is a proven champion of independent, principled journalism...

This is an important initiative for our company and Bari will report directly to me – leading the work of The Free Press and collaborating with our CBS News team in the pursuit of making it the most trusted name in news. We believe the majority of the country longs for news that is balanced and fact-based, and we want CBS to be their home.”

It quoted Ms. Weiss as saying:

“This is a great moment for The Free Press. This partnership allows our ethos of fearless, independent journalism to reach an enormous, diverse, and influential audience. We honor the extraordinary legacy of CBS News by committing ourselves to a singular mission: building the most trusted news organization of the 21st Century.”

(c) The direct link to CJA’s menu webpage of its e-mails to Defendant THE FREE PRESS, beginning March 24, 2025, and, from March 30, 2025, specifically with Ms. Weiss, is [here](#).

33. **Defendant WINS NY RADIO 1010** is a commercial, all-news AM radio station, operating from studios in Manhattan. As reflected by its website, [www.audacy.com/1010wins](http://www.audacy.com/1010wins), it is owned by [Audacy, Inc.](#), a privately-owned company based in Philadelphia that is “the second largest radio company in the United States”, with revenue, in 2018, reported as [\\$1.463 billion](#).

(a) According to the “[About](#)” page of its website, Audacy delivers “trusted news”, “bring[ing] people together through voices they trust”, with “trusted local newscasters” providing “24/7 coverage, talk, breaking news and stories that matter most...[with] podcast experts that go in-depth on today’s most relevant topics, giving audiences the information they need...”. It identifies WINS1010 as among its “iconic and award-winning brands”.

(b) By an [August 26, 2025 announcement](#), the NYC Campaign Finance Board announced that Defendant WINS1010 would be a media partner to Defendant PIX11, a broadcast sponsor for two election debates: for public advocate and for comptroller.

(c) Plaintiffs’ e-mails to Defendant WINS1010 are included on CJA’s webpage entitled “[Alerting the Debate Organizers, etc.](#)”

34. **Defendant SCHNEPS MEDIA** is a private media company, based in New York City and Nassau County. Its website, [www.schnepsmedia.com](http://www.schnepsmedia.com), identifies its mission as providing “original high quality content”, with “Community Newspapers” that offer “the largest circulation and readership of any media outlet throughout New York City” with “brands [that] have been the most trusted sources of local news, events and information dating back over 100 years.”

(a) Among its many print newspapers is amNewYork, which it describes as “the leading and largest daily newspaper in New York City”. Among its websites is [www.PoliticsNY.com](http://www.PoliticsNY.com),

whose purpose it states is “to cover New York Politics pulling back the curtain on the people, politics, policies and issues that govern our lives”.

(b) By an [August 26, 2025 announcement](#), the NYC Campaign Finance Board announced that Defendant SCHNEPS MEDIA would be a media partner to Defendant PIX11, a broadcast sponsor for two election debates: for public advocate and for comptroller.

(c) The direct link to CJA’s menu page of its e-mails to Defendant SCHNEPS MEDIA, including its 2025 e-mails, is [here](#).

35. **Defendant CRAIN’S NEW YORK BUSINESS** (hereinafter “CRAIN’S NY”) is a print and digital publication owned by [Crain Communications, Inc.](#), a privately held, family company, headquartered in Michigan, whose 2024 revenue is reported as [\\$250 million](#).

(a) Defendant CRAIN’S NY website, [www.craainsnewyork.com](http://www.craainsnewyork.com), states, as “Our Mission”, at the bottom of its homepage:

*“Crain’s New York Business is the trusted voice of the New York business community – connecting businesses across the five boroughs by providing analysis and opinion on how to navigate New York’s complex business and political landscape.”*

with further elaboration on the Crain Communications’ website, [www.crain.com](http://www.crain.com), the top of whose homepage states:

**“Trusted information for [finance] [business]... leaders**  
Essential analysis, unbiased insights and trusted reporting to give business leaders a competitive edge.”

A link to “[Learn more about our company and brands](#)” brings up a webpage featuring this further as:

**“Trusted information for business leaders**  
Quality journalism is more important than ever. In a world offering an overload of information, Crain provides unbiased analysis, essential data and insights, and trusted reporting to give executives in key industries and markets a competitive edge.”

(b) The direct link to CJA’s webpage of e-mails to Defendant CRAIN’S NY is [here](#).

36. **Defendant NEWSWEEK**, a weekly print magazine, with a website, [www.newsweek.com](http://www.newsweek.com), is owned by Newsweek Publishing, LLC, a privately-held company, headquartered in Manhattan.

(a) Its homepage – and other webpages – include, at the bottom, a “[Policies and Standards](#)” link for a webpage that identifies its “high quality” journalism: “factual and fair...accurate, independent, ethical and responsible” and that “Management is committed to freeing journalists to report and publish on any subject, including issues affecting its owners.” The “Policies and Standards” webpage ends with the following:

**“THE TRUST PROJECT**

Newsweek participates in [The Trust Project](#), a global network of news organizations building Trust Indicators and working with technology platforms to affirm and amplify journalism’s commitment to transparency, accuracy, inclusion and fairness so that the public can make informed news choices.”

(b) Defendant NEWSWEEK’s articles regularly, if not always, include, alongside the byline, the tag “Newsweek is a Trust Project member” that links to its “[Policies and Standards](#)” webpage.

(c) The direct link to CJA’s webpage of 2025 e-mails to Defendant NEWSWEEK is [here](#).

37. **Defendant REUTERS** is owned by Thomson Reuters Corporation, headquartered in Toronto, Canada, with offices in Manhattan. Its 2024 revenue is reported as [\\$7.258 billion](#).

(a) According to the bottom of the homepage of Defendant REUTERS’ website, [www.reuters.com](http://www.reuters.com), Thomson Reuters is “the world’s largest multimedia news provider, reaching billions of people worldwide every day. ...” – a description prefaced by the words: “Information you can trust”. The homepage’s top panel includes a tab “[Investigations](#)” for “Investigations, explanatory journalism and long-form narratives by Reuters journalists”.

(b) The Thomson Reuters' website, [www.reutersagency.com](http://www.reutersagency.com), opens by stating:

"The source for unbiased, factual news content from all corners of the world

...At Reuters, our Trust Principles of integrity, independence, and unbiased reporting are integral to the core of our business. The unrivalled strength and scale of our editorial team, aligned with our commitment to innovation, allows us to deliver world-class journalism in real-time, enhancing your operations and helping you act with speed and confidence. ..."

Its "[About](#)" webpage states, as the first answer to its question "Why Reuters?":

**"News content you can trust**

- Set apart by our unique [Trust Principles](#)
- We are obliged to act with integrity, independence, and freedom from bias
- News we supply is always accurate, reliable, and unbiased".

The "About" tab dropdown includes "[Our Trust Principles](#)", itself linking to a separate webpage for its "[Journalistic Standards and Values](#)".

(c) The direct link to CJA's webpage of e-mails to Defendant REUTERS, including its 2025 e-mails, is [here](#).

**38. Defendant CNN**, part of CNN Worldwide, is, according to the [About](#)" webpage of its [www.cnn.com](http://www.cnn.com) website, "the most honored brand in cable news, reaching more individuals on television and online than any other cable news organization in the United States", with a CNN Newsource that is "the world's most extensively utilized news service partnering with over 1,000 local and international news organizations around the world", further stating, as its "Mission", "We are truth-seekers"; "We bear witness to history as it unfolds and explain not just what happened, but why, and what it means to you"; "We stand for excellence in our journalism".

(a) Defendant CNN is headquartered in Atlanta, Georgia, with offices in Manhattan. It is owned by [Warner Bros. Discovery](#), headquartered in Manhattan, with 2024 revenue reported as [\\$39.32 billion](#).

(b) The direct link to CJA's webpage of 2025 e-mails to Defendant CNN is [here](#).

39. **Defendant FOX NEWS** is a cable news station, with a website at [www.foxnews.com](http://www.foxnews.com), owned by News Corp – the same as owns Defendants NY POST and WALL STREET JOURNAL.

(a) According to its “[About](#)” webpage, Defendant FOX NEWS provides “in-depth news reporting, along with opinion and analysis encompassing the principles of free people, free markets and diversity of thought, as an alternative to the left-of-center offerings of the news marketplace.”

(b) The direct link to CJA’s webpage of e-mails to Defendant FOX NEWS is [here](#).

40. **Defendant NEWSMAX** is “an American cable news, political opinion, and digital media company”, with a website at [www.newsmax.com](http://www.newsmax.com). Its “[About](#)” webpage states that it is the “go-to place for Americans seeking real news that keeps them informed” and “champions a free press, one that provides Americans with balanced coverage, diverse viewpoints, and honest debates on the issues affecting our lives.”

(a) Defendant NEWSMAX is owned by Newsmax, Inc., a publicly traded company, headquartered in Boca Raton, Florida, with a New York office and studio.

(b) The direct link to CJA’s webpage of 2025 e-mails to Defendant NEWSMAX is [here](#).

41. **Defendant WCNY** is a PBS television and radio station in Syracuse, New York, with a website at [www.wcny.org](http://www.wcny.org). It is owned by the Public Broadcasting Council of Central New York, Inc. and has two reporters listed on the 2025 LCA roster, one of whom is host and producer of The Capitol Pressroom, which is broadcast live from the LCA pressroom at the Capitol.

(a) Capitol Pressroom’s website, [www.capitolpressroom.org](http://www.capitolpressroom.org), identifies that it is “a daily, public radio program with the latest insight and analysis from the state capitol” – and posts a schedule showing that it [airs throughout the state](#) on local NPR and PBS radio stations, including on Defendant WNYC.

(b) The direct link to CJA’s menu webpage of its interaction with Defendant WCNY, including its 2025 e-mails, is [here](#).

### FACTUAL ALLEGATIONS

42. Since March 2025, CJA’s homepage, [www.judgewatch.org](http://www.judgewatch.org), has featured a “HAPPENING NOW” center link entitled “**ELECTIONS 2025 – INFORMING THE VOTERS - - ALERT: Corrupt candidates & incumbents are on the ballot**”. The [original formatting](#) of the linked menu page remained essentially unchanged until *after* the June 24, 2025 NYC Democratic Primary, when it was reconfigured to identify what had happened *before*, by a link entitled:

“1.  
**The Rigging of NYC's June 24, 2025 Primary Elections  
by NY's 'Fake News' Press**”

43. The EVIDENCE accessible from this link include the following e-mails from Plaintiff SASSOWER to New York’s press, to which there were NO responses from ANY of the e-mail recipients:

A.  
a **March 18, 2025 e-mail to Defendant LCA’s roster of reporters,**  
entitled “**The NYS Budget -- & the 6 NYS Legislators  
Running for NYC Mayor, NYC Public Advocate,  
Manhattan Borough President, & NYC Council**”

In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate, and correct in stating:

“The New York state budget is OFF THE CONSTITUTIONAL RAILS, rife with constitutional, statutory and legislative rule violations, stealing taxpayer monies on a massive scale, including for salary raises that are the product of ‘false instrument’ reports. This has been proven, since 2013, by our non-partisan, non profit citizens’ organization, Center for Judicial Accountability, Inc. (CJA), in correspondence, testimony, complaints, and lawsuits – all fully-documented and establishing that the Legislature is NOT functioning at a constitutional level, remotely. CJA’s testimony, this year, was three separate, attested-to as true, written statements for three separate

budget hearings: (1) [for ‘local government officials/general government’](#); (2) [for ‘public protection’](#), and (3) [for ‘higher education’](#).

Elections are a time of accountability. What do the six state legislators running in this year’s elections for New York City’s highest offices have to say about this? I have asked them, in e-mails, here linked to their names:

...

- [Assemblyman Zohran Mamdani, running for NYC mayor](#). My supplementing e-mail to him is [here](#);

...

- [Senator Brad Hoylman-Sigal, running for Manhattan borough president](#) – a lawyer, who has chaired the Senate Judiciary Committee since 2019 and whose other memberships include the Senate Finance Committee, Senate Committee on Investigations and Government Operations, Senate Rules Committee, and Senate Committee on Ethics and Internal Governance;

...

For each of them I have created webpages for their candidacies, accessible from CJA’s homepage, [www.judgewatch.org](http://www.judgewatch.org), via the prominent center link: [‘ELECTIONS 2025 -- INFORMING THE VOTERS -- ALERT: Corrupt candidates & incumbents are on the ballot’](#).

I am *cc*’ing the six candidates so that they can additionally prepare themselves for your inquiries. I am available to answer questions, including under oath. Are they?...” (capitalization, underlining, hyperlinks, in the original.)

(1) **The first of the two linked e-mails to Mamdani, dated [March 14<sup>th</sup>](#), was entitled “ELECTIONS ARE A TIME OF ACCOUNTABILITY...”.** In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate, and correct in stating:

“Elections are a time of accountability. Based on your on-the-job performance as a state assemblyman, why do you believe yourself fit to be mayor of New York City – or for any office of public trust?

Five years ago, when you were running for election to the Assembly, I sent you four e-mails to help you win, easily and without money – and to test your integrity for public office. The first three e-mails were to help you win your Democratic primary against the incumbent.

I sent you my [first e-mail](#) entitled ‘I can help you win –’ on April 28, 2020. As I received no response, I re-sent it on May 22, 2020 as part of my [second e-mail](#) entitled ‘You can win, easily & without money, NY’s 36th Assembly seat. All it takes is ‘whistle-blowing’’. Again, I received no response. I then resent both by a June 14, 2020 [third e-mail](#) entitled ‘You can win! – corruption/grand jury complaint

vs Assemblywoman Simotas, filed with Queens D.A., for ‘wilful misconduct in office’, involving larceny & fraud, including as to her OWN legislative salary & the Legislature’s OWN budget’. Again, I received no response.

The original chain of these three unresponded-to e-mails is below and its attachment is above: my June 9, 2020 grand jury/public corruption complaint to Queens District Attorney Melinda Katz, which I thereafter sent you, a second time, by a September 28, 2020 fourth e-mail entitled ‘GOOD NEWS: You have an open-&-shut public corruption issue that will WIN you election – and demonstrate your fitness for public service’. To this I also received no response.

Of course, by then, by a scant 423 votes, you had won your June 2020 Democratic primary over the incumbent – the total votes cast being a measly 16,427. This assured you your Assembly seat, representing, according to the Legislature’s FY2020-21 budget (at p. 2), ‘approximately 129,000 constituents’, as no candidate was on the November 2020 general election ballot running against you. This was also how you won re-election in 2022 and 2024, where, likewise, there was only one candidate on the general election ballots for the 36<sup>th</sup> Assembly seat – you. And compounding this affront to democracy is that in 2022 and 2024, you faced no primaries for your Democratic and Working Families Party lines. In other words, your 2022 and 2024 re-elections were without ever having had to defend your record as an assemblyman.

Today, you are in a hotly contested Democratic primary race to be New York City’s next mayor – and my four e-mails to you from five years ago are again relevant to the issue of your fitness for public office. Please confirm that you received them – and explain why you did not respond.

In reports issued in 2004, 2006, and 2008, New York University’s Brennan Center for Justice described New York’s Legislature as the most dysfunctional in the nation. This dysfunction, reflected in sham committees that do not meaningfully discharge their lawmaking and oversight responsibilities, would have been obvious to you upon taking office in January 2021 and before voting on the state budget in March and April 2021, especially in light of the June 9, 2020 grand jury/public corruption complaint I had sent you twice.

Six weeks into your tenure as an assemblyman and every year thereafter I have furnished testimony for the Legislature’s budget hearings:

- Here’s my (written) oral testimony at the February 10, 2021 budget hearing on ‘public protection’;
- Here’s my (written) oral testimony at the January 25, 2022 budget hearing on ‘public protection’;

- Here's [my written testimony for the February 7, 2023 budget hearing on 'public protection'](#);
- Here's [my written testimony for the January 25, 2024 budget hearing on 'public protection'](#);
- Here's [my written testimony for the February 6, 2024 budget hearing on 'local gov't officials/general gov't'](#);
- Here's [my written testimony for the February 4, 2025 budget hearing on 'local gov't officials/general gov't'](#);
- Here's [my written testimony for the February 13, 2025 budget hearing on 'public protection'](#);
- Here's [my written testimony for the February 25, 2025 budget hearing on 'higher education'](#).

The ONLY difference in the testimony, from year to year, is that, with each year, there is that much more evidence substantiating the previous year's testimony and the [June 9, 2020 grand jury/public corruption complaint](#) that, to date, remains pending before Queens D.A. Katz. Are you unaware of this testimony – and the two citizen-taxpayer action lawsuits I commenced 'on behalf of the People of the State of New York & the Public Interest, in June 2022 and March 2024, suing all three government branches, including you as a member of the Assembly, and seeking declarations of unconstitutionality, unlawfulness and cessation/claw-backs of larcenous disbursements. Has it not been discussed by your legislative colleagues, including at the closed-door party conferences that substitute for discussion and debate at open committee meetings?

New York City voters, whose votes and financial support you are soliciting for your mayoral run, are entitled to your responses to these e-mails, testimony, and lawsuits because they establish corrupt, posturing, and larcenous conduct by you and your fellow legislators, inexplicable except as a manifestation of self-interest, over the public interest. What, if anything, do you deny or dispute?

To assist you in furnishing that measure of accountability by your answers, I have created a [webpage for your mayoral run](#) from which the foregoing is accessible, plus the complaints I have filed with ethics and criminal authorities against you and your co-conspirators. It is part of a series of webpages, featured by the first prominent center link on CJA's homepage, [www.judgewatch.org](http://www.judgewatch.org), entitled '[ELECTIONS 2025 - - INFORMING THE VOTERS -- ALERT: Corrupt candidates & incumbents are on the ballot](#)'.

To further encourage your response, this e-mail will be posted on CJA’s webpage for your mayoral candidacy – and sent to the other New York City mayoral candidates and the media.”

(2) The second of the two linked e-mails to Mamdani, dated [March 17<sup>th</sup>](#), bore the same title as the first, preceded by the word “Supplementing –”. In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate, and correct in stating:

“Here linked is my [written testimony for the Legislature’s February 15, 2023 budget hearing on ‘local government officials/general government’](#), inadvertently omitted from my below March 14<sup>th</sup> e-mail to you, listing my testimonies at and for the Legislature’s budget hearings since you took office as an assemblyman in January 2021.

I have already posted it on [CJA’s webpage for your mayoral candidacy](#), which now also includes a helpful link to an ‘[Archive of CJA’s Testimonies, since 2013, at & for the Legislature’s Budget Hearings -- WITH EVIDENTIARY WEBPAGES](#)’.

As stated by my March 14<sup>th</sup> e-mail:

‘The ONLY difference in the testimony, from year to year, is that, with each year, there is that much more evidence substantiating the previous year’s testimony and the [June 9, 2020 grand jury/public corruption complaint](#) that, to date, remains pending before Queens D.A. Katz.’ (capitalization, underlining, and hyperlinking in the original).”

(3) Plaintiff SASSOWER’s linked-to e-mail to Hoylman-Sigal, [dated March 16<sup>th</sup>](#), also entitled “ELECTIONS ARE A TIME OF ACCOUNTABILITY...”, was comparable, but more extensive by reason of his tenure in the NYS Senate spanning back to January 2013 and the leadership positions he had held. In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate, and correct.

**B.**

a [March 19, 2025 e-mail to Defendant WNYC & its GOTHAMIST,](#)  
also entitled “The NYS Budget -- & the 6 NYS Legislators  
Running for NYC Mayor, NYC Public Advocate,  
Manhattan Borough President, & NYC Council”

Due to blocking, this e-mail was sent again to Defendant WNYC and its GOTHAMIST, by a second [March 19, 2025 e-mail](#), with a further message – this time from Plaintiff SASSOWER’s personal e-mail. In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate, and correct.

**C.**

a [March 20, 2025 e-mail to Defendants NYT, NY POST, DAILY NEWS, NYLJ, WSJ, & AP,](#)  
also entitled “The NYS Budget -- & the 6 NYS Legislators  
Running for NYC Mayor, NYC Public Advocate,  
Manhattan Borough President, & NYC Council”

In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate, and correct in stating:

“Have you read what the New York State Constitution says about how the state budget is to be fashioned and enacted? It is [Article VII, §§1-7](#) – and you need only read its [§4](#) to see that the budget is ‘OFF THE CONSTITUTIONAL RAILS’, as it mandates that the Governor’s appropriation bills – other than for the legislative and judiciary budgets – ‘shall...be a law immediately without further action by the governor’ once the Senate and Assembly reconcile their separate amendments of those bills, limited to striking out or reducing items of appropriation. In other words, New York has a financially constrained, ROLLING BUDGET – with most of the budget NEVER going back to the Governor.

Since 2013, our non-partisan, non-profit citizens’ organization, Center for Judicial Accountability, Inc. (CJA) has proven that the state budget violates a multitude of constitutional, statutory, and legislative rule provisions in a ‘grand larceny’ of billions of dollars in taxpayer monies, including for ‘false instrument’ pay raises. We have done this by correspondence, testimony, complaints, and lawsuits, all fully documented and establishing, additionally, that the Legislature is NOT functioning at a constitutional level, remotely. This year, for three separate legislative budget hearings, we submitted written testimony: (1) [for ‘local government officials/general government’](#); (2) [for ‘public protection’](#), and (3) [for ‘higher education’](#).

Elections are a time of accountability. What do the six state legislators running in this year's elections for New York City's highest offices have to say about this written testimony? I have asked them in e-mails below-linked to their names:

- ...
- [Assemblyman Zohran Mamdani, running for NYC mayor.](#) My supplementing e-mail to him is [here](#);
  - [Senator Brad Hoylman-Sigal, running for Manhattan borough president](#) – a lawyer, who has chaired the Senate Judiciary Committee since 2019 and whose other committee memberships include the Senate Finance Committee, Senate Committee on Investigations and Government Operations, Senate Rules Committee, and Senate Committee on Ethics and Internal Governance;
- ...

For each candidate I have created a webpage posting evidence additional to what is presented by my above e-mails. These are accessible from CJA's homepage, [www.judgewatch.org](http://www.judgewatch.org), via the prominent center link: '[ELECTIONS 2025 -- INFORMING THE VOTERS -- ALERT: Corrupt candidates & incumbents are on the ballot](#)'.

I am cc'ing the six candidates so that they can further ready themselves for your inquiries – and am available to answer questions, including under oath. Are they? Let them start with [Article VII, §4.](#)" (hyperlinking, capitalization, underlining in the original).

**D.**  
**a [March 20, 2025 e-mail to Defendant AP,](#)**  
**entitled "Is AP handling Albany reporting for the Daily News**  
**& Wall Street Journal? -- The NYS Budget --**  
**& the 6 NYS Legislators Running for NYC Mayor,**  
**NYC Public Advocate, Manhattan Borough President, & NYC Council"**

In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate, and correct in stating:

"TO: Associated Press/Albany Reporter Anthony Izaguirre

Inadvertently I omitted you from my below e-mail, sent this morning to NYC's 'local journalism'. I assume that the Daily News and Wall Street Journal, both no longer listing reporters on Albany's [Legislative Correspondents Association roster](#), subscribe to AP and will now be relying on AP reporting for their Albany coverage.

I did send my below e-mail to your AP colleague Michael Hill, whose name newly appears on the LCA roster. However, it bounced back with the message:

\* [mhall@ap.org]: 550 5.4.1 Recipient address rejected: Access denied.

[CH2PEPF00000145.namprd02.prod.outlook.com 2025-03-20T12:21:24.769Z 08DD64B29D4EBF68]’.

I do not know why this is, inasmuch as I got no bounce-back from him two days ago to my fairly comparable [March 18<sup>th</sup> e-mail to you, him, and the LCA roster](#). I am mystified as to why he would block me, if he did block me.

I am *cc*’ing Mr. Hill to see if I again get a bounce-back. Just in case, kindly forward this e-mail to him so that he can respond.

He wrote the February 18<sup>th</sup> article ‘[New York’s ethics watchdog ruled constitutional by state’s top court](#)’ – and I am particularly eager to speak to him about it. Was he aware of my December 16, 2024 motion to the Court of Appeals to file an *amicus curiae* brief to prevent fraud in the case, to which I alerted you and your LCA colleagues by a [January 4<sup>th</sup> e-mail](#) entitled ‘HEADS UP! Behind the Scenes, at the Court of Appeals, in Cuomo v. COELIG, Scheduled for Oral Argument this Tues, Jan 7<sup>th</sup>?’. Mr. Hill reported on the oral argument, writing the AP story ‘[Constitutionality of New York’s ethics panel argued before state’s top court](#)’.

I am also *cc*’ing [AP/NYC reporter Jake Offenhartz](#), with whom you wrote a March 6<sup>th</sup> article ‘[As many top Democrats stay silent on Cuomo mayoral run, an accuser feels betrayed](#)’. The unconstitutionality, lawlessness, and larceny of the NYS budget and of the ‘false instrument’ pay raises it embeds – the subject of my e-mails two days ago and below – brings down [Cuomo](#), [Stringer](#), and other candidates and incumbents in the mayoral and other NYC races – the six NYS legislators, [Myrie](#), [Ramos](#), [Mamdani](#), [Hoylman-Sigal](#), [Rajkumar](#), and [Epstein](#), among them.

I look forward to speaking with you directly about this – and with Messrs. Hill and Offenhartz – and as soon as possible. TIME IS OF THE ESSENCE with respect to the state budget and NYC elections, both happening NOW.” (underlining, capitalization, hyperlinking, italics in the original).

**E.**  
**an [April 7, 2025 e-mail to Defendant LCA roster of reporters](#),**  
**entitled “ALERT: NYS Budget is violating the NYS Constitution,**  
**statutes, & legislative rules to steal taxpayer money**  
**& corrupt governance by policy changes”**

In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate,

and correct in stating:

“Why does your reporting on the New York State budget conceal that it is ‘OFF THE CONSTITUTIONAL RAILS’, rife with constitutional, statutory, and legislative rule violations – and that it is massively-larcenous?

Have you not read [Article VII, §§1-7](#) – whose [§4](#) mandates that the Governor’s appropriation bills – other than for the legislative and judiciary budgets – ‘shall...be a law immediately without further action by the governor’ once the Senate and Assembly reconcile their separate amendments of those bills, limited to striking out or reducing items of appropriation. Do you dispute that New York has a financially constrained, ROLLING BUDGET – with most of the budget NEVER going back to the Governor.

How is the behind-the-closed doors, ‘three-men-in-a-room’ budget dealmaking of Governor Hochul, Temporary Senate President Stewart-Cousins, and Assembly Speaker Heastie, that you have been reporting on for the past three weeks, remotely constitutional?

And what about the Senate and Assembly one-house budget resolutions – each respectively purporting that the [Senate](#) and [Assembly](#) amended the same eight budget bills. This is fraud. NONE of those eight bills were ever amended, in fact. There are NO votes by ANY senators and ANY assembly members on a single one of them.

And what about Governor Hochul’s five so-called ‘Article VII’ bills that contain policy? Here, too, these are fraud. Governor Hochul NEVER introduced any of these five bills, in fact. Rather, she submitted them to the Legislature, as draft bills, requiring Senate and Assembly sponsors. How did they then each mysteriously morph into actual bills, without Senate and Assembly sponsors, falsely stating that they were introduced by the Governor?

Here’s [CJA’s FOIL requests pertaining to the FY2025-26 state budget](#), from which you can verify the TRUTH about the ten budget bills comprising Governor Hochul’s executive budget. Start with:

- [CJA’s February 7, 2025 FOIL request](#) entitled ‘FY 2025-26 State Budget – for records reflecting: (1) how Governor Hochul’s five proposed ‘Article VII Bills’ each became actual bills, allegedly submitted by her ‘pursuant to article seven of the Constitution’; (2) why these actual bills are not posted on her Division of the Budget’s website; and (3) findings of fact and conclusions of law made with respect to CJA’s March 18, 2020 letter to Governor Cuomo’;
- [CJA’s March 21, 2025 FOIL request](#) entitled ‘Records reflecting how & where the Senate & Assembly ‘amended’ 8 of the Governor’s FY2025-26 budget bills’.

Will you be investigating and reporting this – and the billions and billions of dollars of larcenies of taxpayer monies contained in the Governor’s ten budget bills, including for ‘false instrument’ pay raises – whose cumulative cost, since 2012, is itself on the order of a billion dollars. If not, please explain why – and IMMEDIATELY forward this e-mail to your editors and to managerial levels of your publications, including your legal counsel, so that there is no question as to culpability for your *knowingly* false journalism, having NO First Amendment protection and entitling the defrauded public to massive compensatory and punitive damages against all involved.

Finally, as I have received no response from you to my fully-documented [March 18<sup>th</sup> press release](#) pertaining to the three testimonies I submitted for the Legislature’s budget hearings and its direct relevance to this year’s elections, including to the TOP New York City offices that are on the ballot, I take this opportunity to again bring it to your attention.

I am available to answer your questions – and those of your editors, management, and legal counsel – no matter how early or law. TIME IS OF THE ESSENCE.” (underlining, capitalization, hyperlinking, italics in the original).

**F.**

**an [April 7, 2025 e-mail to Defendant WNYC & its GOTHAMIST](#),  
also entitled “ALERT: NYS Budget is violating the NYS Constitution,  
statutes, & legislative rules to steal taxpayer money  
& corrupt governance by policy changes”**

Due to blocking, this e-mail was sent again to Defendant WNYC and its GOTHAMIST, by a second [April 7, 2025 e-mail](#), with a further message – this time from Plaintiff SASSOWER’s personal e-mail. In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate, and correct.

**G.**

**an [April 18, 2025 email to Defendant LCA roster of reporters](#),  
entitled “Fact-Checking Your Journalism on the NYS Budget --  
& Now Some New Facts”**

In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate, and correct in stating:

“I have received NO responses from you to my below April 7<sup>th</sup> e-mail, supplying you, yet again, with primary-source, documentary EVIDENCE that the NYS budget is unconstitutional, unlawful, fraudulent, and massively larcenous. Meanwhile, your

pack-journalism continues to identically conceal ALL four – as, likewise, their direct relevance to this year’s elections, including to the TOP New York City offices that are on the ballot.

**Who is fact-checking your journalism? Here are some new facts for you and your fact-checkers:**

The [February 18<sup>th</sup> majority decision of the Court of Appeals in \*Cuomo v. COELIG\*](#), rejecting former Governor Cuomo’s challenge to the constitutionality, *as written*, of the ‘ethics commission reform act of 2022’ replacing JCOPE with COELIG – that you uniformly reported, as if legitimate – is a fraudulent cover-up of the unconstitutionality of the state budget and, specifically, the **inclusion of policy in the budget, unconnected with taxes and revenue** – and was so-demonstrated and proven by the [December 16<sup>th</sup> motion](#) I made to file an *amicus curiae* brief in the case to prevent ‘fraud on the court’, to which I alerted you by my [January 4<sup>th</sup> e-mail](#).

Unlike Cuomo who did NOT move to reargue the Court of Appeals Feb 18<sup>th</sup> decision – although many of you reported his spokesman’s statement at the time that he would – I yesterday made a [reargument motion to the Court](#) highlighting the fraudulence of that decision and of the Court’s [January 9<sup>th</sup> order](#) denying my *amicus curiae* motion. This, at [pages 19-21](#) of its Exhibit B ‘legal autopsy’/analysis of [the Court’s March 18<sup>th</sup> order](#) in *CJA v. JCOPE, et al.* and *CJA v. Commission on Legislative, Judicial and Executive Compensation...Wilson, Zayas, et al.* – the two monumental appeals of right, brought on behalf of the People of the State of New York & the Public Interest’, whose records – like that of [CJA v. Cuomo...DiFiore](#) preceding them – establish CJA’s open-and-shut, prima facie entitlement to summary judgment on ALL causes of action, **bringing down the ENTIRETY of the state budget and the ‘false instrument’ salary increases it embeds.**

When will you be reporting on these **three fully-documented cases whose records are a ‘perfect paper trail’ of ‘false filings’ by AG Letitia James, rewarded by fraudulent judicial decisions, utterly corrupting state governance and so profoundly injuring New York’s 20 million people.**

If you have not – as my below April 7<sup>th</sup> e-mail to you requested – forwarded it to ‘your editors and to managerial levels of your publications, including your legal counsel, so that there is no question as to culpability for your *knowingly* false journalism, having NO First Amendment protection and entitling the defrauded public to massive compensatory and punitive damages against all involved’, please now forward this e-mail to them.

As below stated, ‘I am available to answer your questions – and those of your editors, management, and legal counsel – no matter how early or late. TIME IS OF THE ESSENCE.’ (underlining, capitalization, bold, hyperlinking, italics in the original).

H.

**an [April 18, 2025 e-mail to the editor and publisher of The Adirondack Explorer concerning its LCA reporter](#),  
also entitled “Fact-Checking Your Journalism on the NYS Budget --  
& Now Some New Facts”**

In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate,  
and correct in stating:

“In response to my below e-mail to your Albany reporter Gwendolyn Craig, I received an immediate ‘Out of office’ autoreply stating she was ‘away on family leave until the late summer’ and I should contact you ‘in the interim’. This I am now doing – and by so doing giving you notice of Ms. Craig’s knowingly false, corruption-abetting, election-rigging journalism and complicity in same by her fellow [Legislative Correspondents Association reporters](#), spanning years.

I am available to answer your questions – and would welcome the opportunity to do so, including over the weekend.” (hyperlinking in the original).

I.

**an [April 18, 2025 e-mail to Defendant DAILY NEWS](#),  
also entitled “Fact-Checking Your Journalism on the NYS Budget --  
& Now Some New Facts”**

In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate,  
and correct in stating:

“This morning, while drafting the below e-mail to the [roster of Legislative Correspondents Association reporters](#), I received a phone solicitation to continue my [Daily News](#) digital subscription. I told the representative that I was not interested, even at the most paltry rate, because it was ‘*knowing* false, corruption-abetting, election-rigging’ journalism’ – and that I had documented this, for years, by correspondence to you, without response. The representative held on as I accessed my most recent [March 20<sup>th</sup> e-mail to you](#), and upon doing so, I read her its subject line ‘The NYS Budget -- & the 6 NYS Legislators Running for NYC Mayor, NYC Public Advocate, Manhattan Borough President, & NYC Council’ and recited your six names, plus [voicers@nydailynews.com](mailto:voicers@nydailynews.com) to which I had also sent it. She stated that she would pass on what I had told her – and, would, at my request, forward you the recording of our conversation so that you could hear precisely what I had said.

How shocking that you no longer have a reporter listed on the LCA roster, though perhaps it is just as well as your having one did NOT produce honest reporting of the corruption infesting state governance.

Please forward this to e-mail to [former Daily News Co-Publisher Eric J. Gertler](#), *a propos* of his April 5, 2025 [Daily News](#) opinion article “[Best to seek Albany budget constraint](#)” and, additionally, to [Daily News](#) legal counsel and ownership so that there is no question that they know what has been going on – and can guide you accordingly.” (hyperlinking in the original).

**J.**

**an [April 18, 2025 e-mail to Defendant WNYC & its GOTHAMIST](#), also entitled “[Fact-Checking Your Journalism on the NYS Budget -- & Now Some New Facts](#)”**

In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate, and correct in stating:

“My below self-explanatory e-mail, sent earlier this morning to the entire roster of the [Albany Legislative Correspondents Association](#), bounced back with respect to your two reporters Jimmy Vielkind and Jon Campbell. ...

I have repeatedly alerted you to the block, which you have not removed. Quite obviously, it has STILL not been removed, following [my most recent April 7<sup>th</sup> e-mail to you, sent from my personal e-mail address](#).

Please IMMEDIATELY forward this e-mail to [President & CEO LaFontaine E. Oliver and General Counsel Ivan Zimmerman](#) for appropriate explanation and action – and, additionally, to each and every member of your Board of Trustees and Honorary Board, so that they can be alerted to the situation.” (hyperlinking and capitalization in the original),

Due to blocking, this e-mail was sent again to Defendant [WNYC](#) and its [GOTHAMIST](#), by another [April 18, 2025 e-mail](#) – this time from Plaintiff SASSOWER’s personal e-mail, and reiterated:

“Remove the block – and start discharging your duties as journalists to report facts essential to our democracy and informed voting where they run counter to your partisan and personal interests.” (underlining in the original).

K.

a [May 18, 2025 e-mail to Defendant NYT](#),  
entitled “**Rebuttal to A.G. Sulzberger’s May 13th opinion column  
‘A Free People Need a Free Press’**”,  
re-sent by a [May 19, 2025 e-mail](#) and mailed

In every material respect, including by their attached [May 18, 2025 letter to Publisher Sulzberger](#) from Plaintiff SASSOWER, these two e-mails are true, accurate, and correct, in every material respect. As to the May 18, 2025 letter, it began:

“Your May 13, 2025 opinion column “[A Free People Need a Free Press](#)” states:

‘Our loyalty is to the truth and to a public that deserves to know it. That is the distinct role that independent news organizations like The Times play in our democracy.’

If you actually believe that The Times is true to its ‘mission to follow the facts and bring the public the true stories’, that it furnishes ‘the flow of trustworthy news and information the public needs to make decisions’, ‘asks the tough questions and exposes the hidden truths that enable the public to hold powerful interests accountable’, in other words, that The Times fulfills the responsibilities for which the First Amendment grants it freedom, you have been kept in the dark, totally, as to how The Times has been operating – and how other ‘independent news organizations’ have been operating – including with respect to conflicts-of-interest, not mentioned as such by your lengthy opinion column.

Here’s some illustrative evidence, sent to The Times and other ‘independent news organizations’:...”

The “illustrative evidence” was:

- Plaintiff SASSOWER’s [March 20, 2025 e-mail](#) to Defendants NYT, NY POST, DAILY NEWS, NYLJ, WSJ, and AP – without response;
- Plaintiff SASSOWER’s [April 7, 2025 e-mail](#) to Defendant LCA’s roster of reporters – without response;
- Plaintiff SASSOWER’s [April 18, 2025 e-mail](#) to Defendant LCA’s roster of reporters – without response;

followed by one more example:

- Plaintiff SASSOWER’s [March 25, 2025 e-mail](#) to Defendant NYT entitled “ALERT: Behind-the-Scenes of Tomorrow’s House DOGE Subcommittee

Hearing on NPR & PBS Bias” pertaining to her [February 18, 2025 letter to House DOGE Subcommittee Chair Marjorie Taylor Greene and Federal Communications Chair Brendan Carr](#) entitled “Defunding NPR, PBS – & Firing the CPB’s Inspector General, for starters”, replicated by her [e-mails and electronic messages to other press, on March 24<sup>th</sup>, March 25<sup>th</sup>, and thereafter](#) – without response.

The May 18, 2025 letter then asked – and stated:

“How do you explain this? These e-mails were not about partisanship or ideology. They were about flagrant unconstitutionality and unlawfulness of governance, about failed safeguards of our democracy, and about posturing, fraudster politicians of all persuasions – fully substantiated by evidentiary proof. Where were [The Times](#) and the other ‘free press’ celebrated by your column with phrases like:

‘independent news organizations’;

‘independent journalists who dare to provide the public with truthful reporting about the actions of those in power’;

‘journalists willing to ask tough questions and inform the public honestly’;

‘the free press...designed to be a watchdog’.

As for [The Times](#)’ contemporaneous reporting about the subject matter and politicians embraced by these e-mails – and I purchased a digital subscription of [The Times](#) solely for purposes of being able to examine same<sup>fn</sup> – the comparison reveals the legitimacy of President Trump’s ‘fake news [New York Times](#)’ moniker and that [The Times](#) and its self-aggrandizing ilk are – to use President Trump’s words that you decry – ‘the enemy of the people’, committing ‘treason’ by their journalism.

Your column concludes:

‘Democracy assigns different roles to all of us. The role of the press is to arm everyone else with the information and context they need to understand and meet the moment.

Without a free press, how will people know if their government is acting legally and in their interest? How will people know if their leaders are telling the truth? How will people know if their institutions are acting to the benefit of society? How will people know if their freedoms are being sustained, defended and championed – or eroded by forces that seek to replace truth and reality with propoganda and misinformation?

A strong and independent press is essential to self-rule, to personal liberty, to national greatness. That once radical insight, made law in the First Amendment, anchored a centuries-long, bipartisan tradition of supporting the rights of journalists. If broken, a free and independent press won't be easy to rebuild.

As the free press and democracy more broadly face this period of pressure, I'd urge you to support both by seeking out news sources worthy of your trust. News sources that produce original, independent reporting in the public interest and that have a record of challenging power, no matter who wields it. Make room for this kind of journalism in your lives and routines. Read. Listen. Watch. Engaging in the news is one of the simplest, most essential acts of citizenship. This is not the time to tune out.'

By this letter, I am fulfilling the critical role that our democracy assigns to citizens *vis-à-vis* the press, namely, to alert it to what must be investigated and reported, if our democracy is to be preserved. This is what I have been faithfully doing for over 35 years – always with evidence for independent verification. As relates to The Times, that record of citizenship extends back to 1989 – and is posted on CJA's website, [here](#), from which you can additionally access the full record of my lawsuit against The Times in vindication of the First Amendment. Brought expressly for 'The Public' and expressly to establish a cause of action for 'journalistic fraud'

...

My [February 18, 2025 letter to DOGE Subcommittee Chair Greene and FCC Chair Carr](#) (at p. 7), by its quoting of my [June 4, 2021 'Dear Mr. Trump' website message](#), links to that [landmark lawsuit against The Times](#) and to my [comparable lawsuit against Gannett](#), stating that they were 'aimed at securing media accountability' and that 'both were 'thrown' at trial and appellate levels by fraudulent judicial decisions of NY's state courts because there was no legitimate defense to either lawsuit.'

I look forward to assisting your review of the foregoing. I invite you to call me and would welcome meeting with you for an honest discussion as to how to best move forward. At issue are not First Amendment-protected good faith mistakes and errors, promptly rectified – which is the only press shortcoming to which your column concedes, in stating:

'Even the best news organizations – the ones with the highest standards, the most rigorous processes, the best track record of putting the public interest first – don't always get it right. At The Times we run a daily corrections section for good reason. And in our long history, you'll find we've made our share of bigger mistakes, as well.

But independent journalism is designed to be self-correcting. We constantly ask the same questions of ourselves that we hear from our

critics. Were we open-minded enough to unexpected facts? Were we skeptical enough of prevailing narratives? ... Were we too soft? Too tough? Did we double-check, triple-check, then check again? When we make mistakes, we try to own them, learn from them and do better.’

Before you is the opportunity to model the ‘self-correct[ion] of independent journalism’ – starting with my above four e-mails to The Times. Comparing them to The Times’ contemporaneous journalism reveals The Times’ 100% adherence to ‘prevailing narratives’, with ZERO ‘skeptic[ism]’, and ZERO ‘open-minded[ness]’, concealing, IN TOTO, the rebutting primary-source documentary evidence those e-mails furnished. ...”

44. After the June 24, 2025 NYC Democratic primary, CJA’s menu webpage for **“ELECTIONS 2025 -- INFORMING THE VOTERS -- ALERT: Corrupt candidates & incumbents are on the ballot”** was reconfigured to ask:

“2.

**And Now, After the NYC Primary Elections,  
Will the Press Report on Corrupt Candidates & Incumbents on the Ballot?”**

45. The linked webpage posts Plaintiff SASSOWER’s e-mails to the defendants herein and, additionally, to other New York and national press. There were no responses from any of the recipients of these e-mails, other than from one, abusing Plaintiff SASSOWER and refusing to respond to the evidence – and it, too, is posted.

(a) In every material respect, including by their evidentiary hyperlinks, these e-mails are true, accurate, and correct – and each defendant was sent e-mails addressed to it.

46. The e-mails to Defendant NYT are posted first – and they consist of four, each containing a critique of its journalism:

A.

a [July 11, 2025 e-mail to Defendant NYT](#),  
addressed to its Assistant Managing Editor for Standards & Trust,  
cc'ing Metro and Editorial, among others

In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate,  
and correct in stating:

“The Times’ July 4<sup>th</sup> 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 14<sup>th</sup> e-mail](#) to Mandami entitled ‘ELECTIONS ARE A TIME OF ACCOUNTABILITY...’, whose supplement I sent him on [March 17<sup>th</sup>](#) – thereafter sending both to him again when I cc’d him on my [March 18<sup>th</sup> 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 20<sup>th</sup> 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 20<sup>th</sup> e-mail I would then feature as ‘Example #1’, at page 1, of my mailed [May 18<sup>th</sup> letter to Publisher A.G. Sulzberger](#), e-mailed to eight Times e-mail addresses, including Editorial, Metro, and the three Albany reporters, on [May 18<sup>th</sup>](#) and [May 19<sup>th</sup>](#).

As the ‘news value’ of my e-mails to Mamdani are obvious, did The Times not ask him to confirm their equally obvious truth? And if not, why not – and will it do so now?

Also, and plainly reinforcing, was the obvious ‘news value’ of my [March 16<sup>th</sup> 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 18<sup>th</sup> and March 20<sup>th</sup> 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 Mandami and Hoylman-Sigal as state legislators, corrupting lawful, constitutional

state governance and irreparably injuring the People of New York.” (underlining, hyperlinks, capitalization, italics in original).

**B.**

**a July 13, 2025 e-mail to Defendant NYT,  
addressed to its Assistant Managing Editor for Standards & Trust,  
cc’ing Metro and Editorial, among others**

In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate,

and correct in stating:

“Eight hours after sending you my below July 11<sup>th</sup> 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 11<sup>th</sup> 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 14<sup>th</sup>, March 17<sup>th</sup>, March 18<sup>th</sup>, and March 20<sup>th</sup> e-mails to him establish. Have you not yet determined their ‘news value’?

By the way, is The Times’ May 28<sup>th</sup> 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’, interspliced with The Times’ usual anti-Israel slanting and slandering, 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 28<sup>th</sup> article, by two of your three Albany reporters – recipients of my March 18<sup>th</sup> and March 20<sup>th</sup> e-mails and of my May 18<sup>th</sup> 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 9<sup>th</sup> 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 14<sup>th</sup>, whether you will be confirming from Mamdani the obvious truth of my e-mails to him, etc.” (underlining, hyperlinks, italics, capitalization in original).

C.

**an [August 9, 2025 e-mail to Defendant NYT](#),  
addressed to its Assistant Managing Editor for Standards & Trust,  
cc’ing Metro and Editorial, among others**

In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate, and correct in stating:

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

Are you unaware that notwithstanding my July 13<sup>th</sup> e-mail highlighted the fraud of The Times' May 28<sup>th</sup> article '[Mamdani Has a Thin Legislative Record but Is a Forceful Voice in Albany](#)', The Times linked to it in its August 6<sup>th</sup> 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 28<sup>th</sup> 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 24<sup>th</sup> 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 24<sup>th</sup> – and thereafter twice, by my July 11<sup>th</sup> and July 13<sup>th</sup> 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 30<sup>th</sup> 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 11<sup>th</sup> and July 13<sup>th</sup> 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 24<sup>th</sup> 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."  
(underlining, hyperlinking, italics, bold, capitalization in original).

**D.**

**a September 18, 2025 e-mail to which Defendant NYT was cc'd,**  
**addressed to the director of Siena Polling/Research Institute at Siena University**

In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate,  
and correct in stating:

"*A propos* of your partnership with The New York Times and its release of the New York Times/Siena poll on the NYC mayoral race, reported by its September 9<sup>th</sup> article 'Mamdani Holds Huge Lead in Mayor's Race, Times/Siena Poll Finds', this is

to put you on NOTICE that The Times and other press have been rigging Mamdani's win as NYC mayor – and their success in doing this is what is reflected by the poll.

The facts as to the rigging of Mamdani's win by The Times and other press are summarized, with substantiating EVIDENTIARY links, by the above-attached and below linked:

- [August 24<sup>th</sup> Announcement](#) 'MOBILIZING NEW YORK'S JEWISH, PRO-ISRAEL & OTHER COMMUNITIES: SPREAD THE WORD – Mamdani's Win as NYC Mayor is being Rigged by the NYT & Other NY Press, Concealing his Corruption as a NYS Assemblyman – A Scandal He Cannot Survive'; and
- [September 4<sup>th</sup> News Tip/Alert](#): 'Mamdani Can't Be Elected NYC Mayor, Because He Must Be Indicted & Will Be Convicted of Corruption, as a NYS Assemblyman' [].

Obvious from their cited-to and linked four e-mails I sent to Mamdani in March of this year, starting with my [March 14<sup>th</sup> e-mail](#) entitled 'ELECTIONS ARE A TIME OF ACCOUNTABILITY...' and my supplementing [March 17<sup>th</sup> e-mail](#), is that had The Times and other press reported on these e-mails, furnished to them by my [March 18<sup>th</sup> e-mail](#) and by my [March 20<sup>th</sup> e-mail](#), each cc'ing Mamdani, his candidacy would have ended then, by his indictment for corruption as a NYS assemblyman involving the state budget, his own legislative salary, and NY's oversight/'public protection' entities, as to which his best option would have been to take a plea deal – and that Cuomo's candidacy would also have ended then, by his indictment for corruption as NY's former governor, as to which his best option would also have been a plea deal – with comparable indictments and deals for Governor Hochul, Temporary Senate President Stewart-Cousins, and Assembly Speaker Heastie – *for starters*.

No amount of favorable ratings – or the endorsements they propel – can save Mamdani from the criminal consequences of the mountain of open-and-shut, *prima facie* EVIDENCE furnished by those e-mails – and plainly, his favorable ratings, such as what the September 9<sup>th</sup> article terms 'voters' personal regard for him', *to wit*, 'being inspirational' and having 'good character', will plummet upon press reporting of his on-the-job-performance as a NYS assemblyman and the vast, irreparable injury it has done to NY's state and local governance and the People of NY. This poll plummet will also be the fate of Cuomo, Hochul, Stewart-Cousins, and Heastie – and such conspiring accomplices on the NYC election ballots as NYC Public Advocate Jumaane Williams, Manhattan D.A. Alvin Bragg, Brooklyn D.A. Eric Gonzalez, and NYS Senator Brad Hoylman-Sigal, running to be Manhattan borough president.

As for the poll's questions as to which candidate 'has best addressed the Israeli-Palestinian conflict during the campaign' and 'In the dispute between Israel and the Palestinians, which side do you sympathize with more: Israel or the Palestinians?', The Times and other press have rigged the answers to these, as well, by their deluge

of slanted and false reporting about Israel that have given resonance and credibility to Mamdani's brazen LIES. The answers, which The Times separately featured by a September 10<sup>th</sup> article '[Gaza War Turns New Yorkers Against Israel, With Mayor's Race as Backdrop](#)', not only emboldened Mamdani, as evident from The Times' September 12<sup>th</sup> article '[Mamdani, if Elected Mayor, Pledges to Order N.Y.P.D. to Arrest Netanyahu](#)', but resulted – as The Times presumably knew it would – in collapsing support for Israel as a bulwark against him, which it then facilitated by publishing Governor Hochul's political endorsement of Mamdani as a '[guest essay](#)' on Sunday night, September 14<sup>th</sup>, along with an article '[Hochul Endorses Mamdani for Mayor of New York](#)'. On September 15<sup>th</sup> came '[Cuomo, Staunch Supporter of Israel, Says 'Horrific' Gaza War Must End](#)' and, on September 16<sup>th</sup>, '[Carl Heastie, Another Democratic Holdout, Endorses Mamdani](#)'.

Suffice to add that the September 9<sup>th</sup> '[Mamdani Holds Huge Lead in Mayor's Race, Times/Siena Poll Finds](#)' article included the sentence:

'Voters have doubts about whether Mr. Mamdani, [a three-term state lawmaker](#) with [a sparse résumé](#), can deliver on his ambitious campaign plans.'

The link for '[a three-term state lawmaker](#)' is to The Times' May 28<sup>th</sup> article '[Mamdani Has a Thin Legislative Record but Is a Forceful Voice in Albany](#)', as to which, by a [July 13<sup>th</sup> e-mail](#) to The Times I asked and stated:

'is...[this] 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', interspliced with The Times' usual anti-Israel slanting and slandering, 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.'

I received no response – and stated this by my [August 9<sup>th</sup> e-mail](#) to The Times, asking, in pertinent part:

'Are you unaware that notwithstanding my July 13<sup>th</sup> e-mail highlighted the fraud of The Times' May 28<sup>th</sup> article '[Mamdani Has a Thin Legislative Record but Is a Forceful Voice in Albany](#)', The Times linked to it in its August 6<sup>th</sup> 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 28<sup>th</sup> 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 24<sup>th</sup> 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 24<sup>th</sup> – and thereafter twice, by my July 11<sup>th</sup> and July 13<sup>th</sup> 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.**” (hyperlinks and bold in the original).

I received no response.

As for the link to ‘[a sparse résumé](#)’, it is to The Times’ June 10<sup>th</sup> article ‘[Can Mamdani Persuade New York to Elect Its Youngest Mayor in a Century?](#)’, stating, in pertinent part:

‘Mr. Mamdani’s résumé is comparatively slight. The son of a renowned filmmaker and academic, he bounced among gigs — working on one of his mother’s movies, as a rapper, a campaign organizer, a part-time tutor and a foreclosure counselor — before winning a seat in the Assembly in 2020. In Albany, he has [a reputation](#) more for advocacy than lawmaking.

...

His tenure has also been relatively brief in Albany, where it can take years to accumulate power. Colleagues say he helped push the ideological center leftward, but only had three relatively minor bills signed into law.’

The ‘[reputation](#)’ link is back to the May 28<sup>th</sup> article.

Notably, there is no question in your poll as to the sources of the respondents’ views about the candidates or issues – and, specifically, which media they consume. Isn’t that relevant?

I look forward to discussing the foregoing with you – and ask that you forward this e-mail to your contacts at The Times and to its Law Department for their response to The Times’ willful violation of its First Amendment responsibilities and journalistic

duties that have rigged the poll and, based thereon, the NYC mayoral race. What corrective steps will The Times be taking?

Meantime, I am *cc'ing* the authors of the above Times articles, to the extent they are not among the recipients of my succession of e-mails to The Times since March 18<sup>th</sup>, also *cc'd*.” (italics, underlining, hyperlinking, capitalization, bold in original).

47. Many of Plaintiff SASSOWER's e-mails to other defendants included the original chain of her first two and then first three e-mails to Defendant NYT. Or these e-mails were furnished by links, as, for example, in the August 24<sup>th</sup> Announcement and September 4<sup>th</sup> News Tip/Alert, sent to a wide swath of New York and national press, defendants among them, by e-mails stating: “Take your pick”.

(a) The chief difference between the “pick” is that the August 24<sup>th</sup> Announcement included the following:

“Zohran Mamdani's win as NYC mayor is being rigged by The New York Times and other NY press. In tandem with their pervasive anti-Israel slanting and defamations, giving credibility and resonance to Mamdani's anti-Israel, pro-Hamas falsehoods, they are concealing his corruption as a NYS assemblyman.

...

The catastrophic result of this concealment by The Times and other NY press of what NYC voters most need to know and their incessant reporting of polls, endorsements, and fundraising that their own fraudulent, ‘fake news’, fawning journalism generates, is that NY's Jewish, pro-Israel, and other communities are dispirited and have been inhibited from mobilizing against Mamdani because of the purported inevitability of his electoral victory in November.” (underlining in the original).

(b) Upon information and belief, Defendant NYT and other press were fully aware that Mamdani's repetitive claims that Israel was committing genocide in Gaza and is an apartheid, colonialist state, which they were reporting, are false, but – as with plaintiffs' March 14<sup>th</sup>, March 17<sup>th</sup>, March 18<sup>th</sup>, and March 20<sup>th</sup> e-mails – *did not confront him with evidence rebutting his anti-Israel, pro-Hamas lies*, as, for instance, the scholarly book Beyond Proportionality: Israel's Just War in Gaza by New York City resident and law professor Thane Rosenbaum, published May 19<sup>th</sup>, five

weeks before Mamdani's June 24<sup>th</sup> Democratic primary win, and produced no reviews or discussions of the book, then or thereafter.

(c) In every material respect, including by their evidentiary hyperlinks, Plaintiff SASSOWER's e-mails to the other defendants and press are – like her e-mails to Defendant NYT – true, accurate, and correct.

48. On September 28<sup>th</sup> Plaintiff SASSOWER sent an [e-mail to Defendant LCA reporters](#) entitled "FOR REPORTING: CJA's Testimony/Complaint at COELIG's Sept 25th Hearing vs COELIG &, of Immediate & Election-Decisive Priority, vs NYS Assemblyman Mamdani & NYS Senator Hoylman-Sigal". Beneath its attached [testimony/complaint](#), the e-mail stated:

"It appears that the ONLY press reporting of [the live-streamed and videoed September 25<sup>th</sup> third annual hearing of the Commission on Ethics and Lobbying in Government \(COELIG\)](#) are [Spectrum News'](#) September 25<sup>th</sup> '[Good government groups: N.Y. lobbyists must be mandated to report campaign contributions](#)' by LCA member Kate Lisa, whose falsity includes portraying COELIG as a properly functioning entity, and, of the same ilk, the [Albany Times Union's](#) September 25<sup>th</sup> afternoon [Capitol Confidential](#) '[How New York's public ethics rules could change in 2026](#)' by LCA member Dan Clark. This, in face of my testimony at the morning hearing, as its first witness, particularizing COELIG's corruption in handling complaints, which disappear, without disposition and without listing in its annual reports.

To assist you in reporting on COELIG's [readily-verifiable corruption](#) with respect to complaints and its annual reports -- of which I furnished you EVIDENCE previously, as, for instance, by my [January 4<sup>th</sup> e-mail](#), with its link to [CJA's December 16, 2024 motion and amicus curiae brief](#) at the Court of Appeals *in Cuomo v. COELIG* -- above-attached is the written testimony I submitted for the September 25<sup>th</sup> hearing, [expressly](#) as a complaint against COELIG and, [of immediate and election-decisive priority](#), against NYS Assemblyman Zohran Mamdani and NYS Senator Brad Hoylman Sigal.

As stated at page 6 of my testimony on which the complaint is based – and as I materially stated at the hearing:

'Under the exigent circumstances presented by the upcoming elections, for which early voting starts in less than a month, IMMEDIATE 15-day notices to Mamdani and Hoylman-Sigal must issue for their responses to the 'specific and credible evidence' of my

March e-mails – with notification to the district attorneys having criminal jurisdiction over them, Queens D.A. Melinda Katz, Manhattan D.A. Alvin Bragg, and Albany D.A. Lee Kindlon, to IMMEDIATELY summon me to appear before grand juries to give testimony under oath in support of felony indictments against them, forthwith – because, in fact, the evidence against them is not just ‘specific and credible’, but open-and-shut and *prima facie*, guaranteeing that each will be convicted of the multitude of penal law violations, of which they had notice, repeatedly, for years. This is my sole and EMERGENCY recommendation.’ (capitalization and underlining in the original).’

By the way, when were you planning to report on the *open-and-shut, prima facie* EVIDENCE of Mamdani’s corruption, as a NYS assemblyman, and of Hoylman-Sigal’s corruption, as a NYS senator, which I furnished you by my March 18<sup>th</sup> e-mail – and two additional times, thereafter, by my April 7<sup>th</sup> and April 18<sup>th</sup> e-mails?

I am available to assist you in belatedly discharging your First Amendment responsibilities and journalistic duties of truthful, honest reporting. Feel free to call, *no matter how early or late*, as TIME IS OF THE ESSENCE.” (capitalization, hyperlinking, underlining, italics in the original).

(a) In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate, and correct.

3.

**In a Last-Ditch Effort to Salvage the 2025 Elections  
& Prod Defendants to Discharge their Duties to the Voters,  
Plaintiffs Filed This Lawsuit on October 8, 2025 & Furnished Defendants  
with the Verified Complaint & October 16, 2025 Letter to the U.S. Attorney**

49. On October 8<sup>th</sup>, Plaintiffs commenced this federal lawsuit by filing a verified complaint, suing the first 25 defendants. Plaintiff SASSOWER thereupon e-mailed it to them, requesting that they confirm their mailing addresses so that she could send them waivers of service pursuant to Federal Rule 4 and the names and contact information of their counsel.

50. Beginning October 12<sup>th</sup>, Plaintiff SASSOWER sent another e-mail to most of the 25 original defendants entitled “UPDATE & the OBVIOUS legal advice your counsel should be giving

you about CJA’s federal lawsuit vs [You] -- & your First Amendment responsibilities, journalistic duties, & your P.R. about yourselves”. In pertinent part, it stated:

**“...you are on notice of the situation and your financial and criminal liability flowing therefrom. Your counsel, whose name and contact information I again request, should be advising you.**

**Here’s the obvious.** More than ten days remain before the October 25<sup>th</sup> start of early voting – and that is plenty of time for you, as ‘a bulwark for the 1<sup>st</sup> Amendment’, to discharge your duties by reporting on the EVIDENCE of the on-the-job performance of Mamdani as a NYS assemblyman and of Hoylman-Sigal as a NYS senator – and the fate of my fully-documented ethics and criminal complaints against them pertaining to their conduct in office – because, as my March e-mails to each of them stated, ‘ELECTIONS ARE A TIME OF ACCOUNTABILITY...’

What does Mamdani deny or dispute about my [March 14<sup>th</sup>](#) and [March 17<sup>th</sup>](#) e-mails to him? And what does Hoylman-Sigal deny or dispute about my [March 16<sup>th</sup> e-mail](#) to him?

And what is the status of my [September 25<sup>th</sup> complaint against both Mamdani and Hoylman-Sigal](#) to the [Commission on Ethics and Lobbying in Government \(COELIG\)](#), annexing those three e-mails and additionally annexing my [March 18<sup>th</sup>](#) and [March 20<sup>th</sup>](#) e-mails to which they were cc’d, and stating to COELIG:

‘Under the exigent circumstances presented by the upcoming elections..., IMMEDIATE 15-day notices to Mamdani and Hoylman-Sigal must issue for their responses to the ‘specific and credible evidence’ of my March e-mails – with notification to the district attorneys having criminal jurisdiction over them, Queens D.A. Melinda Katz, Manhattan D.A. Alvin Bragg, and Albany D.A. Lee Kindlon, to IMMEDIATELY summon me to appear before grand juries to give testimony under oath in support of felony indictments against them, forthwith – because, in fact, the evidence against them is not just ‘specific and credible’, but open-and-shut and *prima facie*, guaranteeing that each will be convicted of the multitude of penal law violations, of which they had notice, repeatedly, for years.’ (capitalization in the original).

And what have these three D.A.s – and NY’s other 59 – been doing with my [July 18, 2024 grand jury/public corruption complaint](#) against ALL state legislators, most of whom were then running for re-election, such as Mamdani and Hoylman-Sigal, and who, in the complete absence of reporting by you, were virtually all re-elected on November 5<sup>th</sup> of last year – with re-election, as well, of [nine complicit incumbent D.A.s, then running for re-election, unopposed, plus election of five complicit D.A. candidates, such as Kindlon.](#)

How about following the trail to the [Commission on Prosecutorial Conduct](#), to which, based on the July 18, 2024 grand jury/public corruption complaint, I filed a [November 18, 2024 complaint](#) against the 62 D.A. incumbents for their conflict-of-interest-driven nonfeasance, enabling those election results. Among the complained-against 62 D.A. incumbents, the dozen or so who, this year, have been running for re-election, such as Manhattan D.A. Bragg and Brooklyn D.A. Eric Gonzalez, with the latter running for re-election [unopposed](#), as are at least six other D.A. incumbents: [Suffolk County D.A. Ray Tierney](#), [Clinton County D.A. Andrew Wylie](#), [Tioga County D.A. Kirk Martin](#), [Yates County D.A. Pat Cassella](#), [Genesee County D.A. Kenneth Finnell](#), and [St. Lawrence County D.A. Gary Pasqua](#).

Why don't you find out what the Commission has been doing for [nearly 11 months](#) with the November 18, 2024 complaint, to which it assigned 62 numbers, 34-95, stating, by a [December 26, 2024 e-mail](#), that it would 'be in touch when there is an update' – and what it has been doing for [nearly 7 months](#) with my [March 21, 2025 complaint](#) against the five newbie D.A.s elected in 2024, which the Commission acknowledged, on [March 24<sup>th</sup>](#), further stating 'Complaint numbers 34-95 (submitted in 2024) are still pending.' Apparently, whatever the Commission had then been doing did not deter D.A.s Kindlon, Bragg, Gonzalez, Westchester County D.A. Susan Cacace, and Erie County D.A. Michael Keane from thereupon 'sitting on' my further [March 27, 2025 grand jury/public corruption complaint](#) against ALL state legislators, these including, of course, Mamdani and Hoylman-Sigal.

In that regard, my [February 13, 2025 written testimony for the Legislature's 'public protection' budget hearing](#), to which my March e-mails to Mamdani and Hoylman-Sigal each linked, *expressly for their responses*, specifies (at p. 3) the Commission on Prosecutorial Conduct as yet another sham 'public protection' entity operating without oversight and not doing the job that taxpayers pay it to do – a situation stated to be unconstitutional. Do Mamdani and Hoylman-Sigal disagree?

As always, I am available to assist you and answer your questions. What are you waiting for? TIME IS OF THE ESSENCE.

Please forward to the highest editorial and management levels of the media for which you work so that there is no question as to their knowledge of the situation – and liability therefor." (bold, capitalization, hyperlinking, italics in the original).

(a) In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate, and correct. There was no response to it.

51. [Beginning October 17<sup>th</sup>, Plaintiff SASSOWER sent another e-mail to each of the 25 original defendants](#) entitled "NYS Attorney General Letitia James, the NYC Mayoral Race – & the

Federal Lawsuit, CJA, et al. v. LCA, et al. (25-CV-8370)”. In pertinent part, each of these e-mails stated:

“Yesterday, by the above-attached October 16<sup>th</sup> letter to US Attorney for the Eastern District of Virginia Lindsey Halligan, sent by the below two e-mails, I furnished her with the EVIDENCE of AG Letitia James’ corruption, *in office*, since she was sworn into office on January 1, 2019, and how NY’s press have concealed it, *in toto* – allowing AG James to publicly posture, in countering the Virginia grand jury’s October 9<sup>th</sup> indictment of her for mortgage fraud, that she ‘will continue to fiercely protect New Yorkers and their rights’ – with her co-conspirators in corruption, such as Governor Hochul and NYS Assemblyman Mamdani, doing the same, and Mamdani turning it into a rallying issue for his NYC mayoral win, which, by your journalism, you have been rigging. The EVIDENCE included the October 8<sup>th</sup> verified complaint in *CJA, et al. v. LCA, et al.* (25-CV-8370), to which you are a defendant.

The October 16<sup>th</sup> letter expressly requests that US Attorney Halligan:

- (1) refer the EVIDENCE of AG James’ corruption *in office*, as NYS attorney general, to the Justice Department’s Public Integrity Section of its Criminal Division or to its four NY US Attorneys for presentment to grand juries; and
- (2) refer the EVIDENCE of cover-up, corruption-abetting, election-rigging, journalistic fraud by the *LCA, et al.* defendants to the Justice Department and Federal Communications Commission for investigation of their “frauds and conspiracy crimes” for presentment to grand juries.

In closing, the letter states:

‘I am available to answer your questions, IMMEDIATELY and under oath. Meantime, I will furnish this letter to the lawsuit’s defendants – and to press not named in the lawsuit – so that they can report, accordingly and speedily, to NY voters who they have *knowingly* and deliberately kept ‘in the dark’, totally, about Attorney General James’ corrupting of her office and what has been going on. (capitalization, italics, and underlining in the original).’

That is what I am now doing... (hyperlinking, capitalization, italics, underlining in the original).”

- (a) In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate, and correct. There was no response to it.

52. Plaintiff SASSOWER thereupon e-mailed eight of the nine press that she would add as defendants on this verified amended complaint, furnishing them with the October 8<sup>th</sup> verified complaint, the October 16<sup>th</sup> letter to the U.S. Attorney, and [CJA's webpage for this federal lawsuit](#), from which her e-mails to the 25 defendants are accessible. Excepting her [October 20<sup>th</sup> e-mail to WINS1010](#) and her [October 20<sup>th</sup> e-mail to SCHNEPS](#), whose subject lines began with the words: "NOTICE OF LIABILITY...", the subject lines of the other six, all sent on October 21<sup>st</sup>, read "NOTICE OF LAWSUIT – Your Rigging of the 2025 NYC Mayoral Election & Other Violations of Your First Amendment Responsibilities, Journalistic Codes, & Legal Obligations". Illustrative of their content, Plaintiff SASSOWER's [October 21<sup>st</sup> e-mail to Defendant NEWSWEEK](#), reading:

**"New York City voters and the People of the State of New York are not without remedy for what you – and your fellow press – have been doing, in rigging the 2025 NYC mayoral election by your corruption-abetting, *knowingly* false, 'fake news' journalism – and I have taken the first steps to secure those remedies.**

Above-attached, in addition to the two dispositive attachments I sent you by my below September 19<sup>th</sup> e-mail, to which I received no response, are [CJA's October 8<sup>th</sup> verified complaint in a federal lawsuit against 25 press defendants](#) and [October 16<sup>th</sup> letter to the U.S. Attorney for the Eastern District of Virginia](#). CJA's webpage for these, and it includes my e-mails to the press defendants about them, is [here](#).

As stated in the caption of the October 8<sup>th</sup> verified complaint, the 25 defendants are '*representative of other New York & national media*'.

This is to give you NOTICE that prior to serving the October 8<sup>th</sup> verified complaint, which I have not yet done, I am contemplating amending it to include additional '*representative*' defendants, such as Newsweek. Based on your post-September 19<sup>th</sup> reporting of the 2025 NYC mayoral election, can you give me any reason why I should not do so?

**Please have your legal counsel promptly contact me about this so that I may be guided accordingly – and, in any event, please furnish me with his/her name, e-mail address, and phone number.** I assume it is Zahreen Ghaznavi, listed on your '[masthead](#)' webpage as 'General Counsel', but without an e-mail address and phone number.

Meantime, as there have been at least four additional Newsweek reporters who have written articles on Mamdani and the 2025 NYC mayoral race since my September

19<sup>th</sup> e-mail, I am *cc*'ing them. The most recent article – today – is '[Mamdani Can't Fulfill Campaign Promises Alone, But Has 'Realistic Path'](#)' by Chief Investigative Reporter Joshua Rhett Miller, so-identified by the article and so-listed on your 'masthead'.

Did you not furnish my fully-documented September 19<sup>th</sup> e-mail to Mr. Miller for investigation? Was there anything that did not check out 100% -- establishing that Mamdani cannot be elected NYC mayor because he must be indicted for corruption as a NYC assemblyman and will be convicted. Shouldn't Mr. Miller have shared the e-mail with [Manhattan Institute Senior Fellow Nicole Gelinas](#), for her review, and with [Pace University Clinical Assistant Professor of Political Science Laura Tamman](#), who provided him with such adulatory comment about Mamdani. Both are *cc*'d so that they can revise their comments, accordingly." (bold, italics, underlining, hyperlinking in the original).

(a) In every material respect, including by its evidentiary hyperlinks, this e-mail is true, accurate, and correct. So, too, the five other October 21<sup>st</sup> e-mails.

(b) As for the two October 20<sup>th</sup> e-mails – which specifically related to the October 21<sup>st</sup> debate for public advocate and the October 23<sup>rd</sup> debate for comptroller – and stated, in pertinent part:

“If it is not your intention to call me with respect to [tomorrow's debate for NYC public advocate and Thursday's debate for NYC comptroller](#), for which you are partnered with broadcast sponsor PIX11, one of the press defendants, please forward this e-mail IMMEDIATELY to your legal counsel, whose name, e-mail address, and phone number I request.

To assist you with what my [July 30<sup>th</sup> e-mail](#) DIRECTLY furnished you and what has been accessible to you from CJA's webpage '[ELECTIONS 2025: INFORMING THE VOTERS - - ALERT: Corrupt candidates & incumbents are on the ballot](#)', featured by the [NEWS TIP-ALERT](#), here's [CJA's webpage for Public Advocate Jumaane Williams](#), providing you with the EVIDENCE of his flagrant politicization and corrupting of the very function and purpose of the office of public advocate, for which he must be indicted – and will be convicted – along with those he has 'protected', starting with [Brooklyn D.A. Eric Gonzalez](#) and [Manhattan D.A. Alvin Bragg](#), each on the 2025 ballots” (hyperlinking, capitalization, bold, in the original),

this was not true, accurate, and correct in a single respect, to wit, those two debates for public advocate and comptroller, like the two prior debates for those offices, were [cancelled](#) because only the Democratic candidates had met the threshold required for debate participation.

(c) As to the cancellation of the public advocate and comptroller debates, this was unreported by most defendants – and, upon information and belief, none of the handful of defendants that reported it revealed the deficiencies in their electoral and political reporting that had achieved that result.

53. As to the conduct of the two mayoral debates, on [October 16<sup>th</sup>](#) by Defendants NBC and POLITICO, and on [October 22<sup>nd</sup>](#) by Defendants SPECTRUM NEWS/NY-1, WNYC, and THE CITY, not a question was asked giving the slightest hint of corruption of New York state governance, of which the candidates were and are responsible, knowledgeable, participatory, and benefitting, for which Mamdani and Cuomo must be indicted and will be convicted – and, possibly, Sliwa, as well. Press reporting of the debates also concealed this, while reporting, unchallenged, Mamdani’s response to Cuomo, at the outset of the first debate: “What I don’t have in experience, I make up for in integrity” – an iteration of his false narrative about himself as principled and sincere, propagated by the press throughout his mayoral candidacy, despite the rebutting proof of plaintiffs’ dispositive [March 14<sup>th</sup>](#), [March 17<sup>th</sup>](#), [March 18<sup>th</sup>](#), and [March 20<sup>th</sup>](#) e-mails.

## **CAUSES OF ACTION**

### **FIRST CAUSE OF ACTION** **JOURNALISTIC FRAUD**

54. Plaintiffs repeat, reiterate, and reallege ¶¶1- 53 herein with the same force and effect as if more fully set forth.

55. The purpose of the First Amendment, for which it provides for a “free press”, is to inform the public as to matters essential to governance, so that citizens can “vote intelligently” and “register opinions on the administration of government generally”.

56. Plaintiffs' outreach to defendants was, in its entirety, as to matters essential to governance so that citizens could "vote intelligently" and "register opinions on the administration of government generally". As to these matters, having nothing to do with partisanship or ideology, plaintiffs had personal knowledge. They were participants in the government processes and interlocutors with the relevant constitutional and other public officers, with documentary evidence substantiating their participation and communications.

57. ALL caselaw holds that the First Amendment does NOT confer upon the press freedom to report falsely and that where press reporting is with *knowledge* of falsity, it is actionable.

58. Defendants' journalism with respect to the functioning of New York state governance and the on-the-job performance of constitutional and other public officers concerning matters of government integrity has been materially false and *knowingly* so. This is proven, resoundingly, by plaintiffs' above-recited and linked e-mails.

59. None of the defendants have ever denied or disputed the accuracy of plaintiffs' e-mails – and they are irrefutable because, unlike defendants' journalism, they are all true.

60. Plaintiffs' e-mails, substantiated by evidence – and themselves evidence – establish defendants' materially and *knowingly* false journalism as to matters about which they were reporting and editorializing, yet ALWAYS:

- (a) concealing that the New York state budget is "OFF THE CONSTITUTIONAL RAILS", rife with constitutional, statutory, and legislative rule violations, stealing massive amounts of money and loaded with non-fiscal/non-revenue-producing policy, inserted into the budget by fraud;
- (b) concealing that the Legislature is NOT functioning at a constitutional level and that its committees are sham and do not discharge lawmaking and oversight responsibilities – a situation largely unchanged from what the Brennan Center for Justice described in its [2004](#), [2006](#), and [2008](#) reports, none examining the state budget;

(c) concealing that judges, legislators, executive officers – and D.A.s – have all procured salary increases for themselves by “false instrument” commission/committee reports that violated the very statutes pursuant to which they purported to be rendered and were replete with fraud – these reports being:

- the [August 29, 2011 report of the Commission on Judicial Compensation](#);
- the [December 24, 2015 report of the \(1<sup>st</sup>\) Commission on Legislative, Judicial and Executive Compensation](#);
- the [December 10, 2018 report of the Committee on Legislative and Executive Compensation](#);
- the [December 4, 2023 report of the \(3<sup>rd</sup>\) Commission on Legislative, Judicial and Executive Compensation](#); and
- the [November 14, 2024 report of the \(3<sup>rd</sup>\) Commission on Legislative, Judicial and Executive Compensation](#);

(d) concealing that New York’s “public protection”/ethics and criminal entities are corrupt facades, dumping, without investigation, facially-meritorious, documented complaints, or ignoring them – chief among these:

- the [NYS Commission on Ethics and Lobbying in Government \(COELIG\)](#);
- the [NYS Legislative Ethics Commission \(LEC\)](#) ;
- the [NYS Inspector General](#);
- the [NYS Commission on Judicial Conduct](#);
- the [NYS Attorney Grievance Committees](#);
- the [NYS Court Inspector General](#);
- the [NYS Commission on Prosecutorial Conduct](#);
- the [NYS 62 District Attorneys](#);
- the [NYS Attorney General’s Public Integrity Bureau](#);
- the [NYS Comptroller’s Investigations Unit and Inspector General](#);<sup>9</sup>
- the Legislature’s relevant committees, as, for instance,
  - (a) the Senate & Assembly Fiscal Committees;
  - (b) the Senate Committee on Budget & Revenue;
  - (c) the Senate & Assembly Judiciary Committees;
  - (d) the Senate and Assembly Codes Committees;
  - (e) the Senate & Assembly Ethics Committees;
  - (f) the Senate Committee on Investigations and Gov’t Operations;

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<sup>9</sup> See, comparably, the [NYC Public Advocate](#); the [NYC Department of Investigation](#); the [NYC Conflicts of Interest Board](#); the [Albany County Board of Ethics](#); and, additionally, [NYS’ 4 U.S. Attorneys](#); [FBI & U.S. Justice Department](#).

- (g) the Assembly Committee on Governmental Operations;
  - (h) the Assembly Committee on Oversight, Analysis, and Investigation;
- (e) concealing the corruption of “merit selection” to the New York Court of Appeals, demonstrated repeatedly by plaintiffs, since 1993, most recently, in April 2023 – and the corruption of the Court of Appeals resulting therefrom, starting with its subversion of appeals of right guaranteed by Article VI, §3(b)(1) of the New York State Constitution “wherein is directly involved the construction of the constitution of the state or of the United States”;
- (f) concealing, with a handful of exceptions, that any of the foregoing was ever challenged by lawsuits brought by plaintiffs – and concealing, totally, that, in each lawsuit, the New York attorney general had no legitimate defense, corrupted the judicial process with litigation fraud, and was rewarded by fraudulent judicial decisions, at every level, by judges divested of jurisdiction by interest, including at the Court of Appeals – these lawsuits being:

*Elena Sassower, et al. v. Commission on Judicial Conduct*, commenced in Manhattan Supreme Court in April 1999 (Article 78 proceeding)

*CJA, et al. v. Cuomo, et al.* (declaratory judgment action), commenced in Bronx Supreme Court in March 2012;

*CJA, et al. v. Cuomo, et al.* (1<sup>st</sup> citizen-taxpayer action), commenced in Albany Supreme Court in March 2014;

CJA’s order to show cause to intervene in the Legislature’s declaratory judgment action v. the Commission to Investigate Public Corruption, in Manhattan Supreme Court, in April 2014;

*CJA, et al. v. Cuomo...DiFiore* (2<sup>nd</sup> citizen-taxpayer action), commenced in Albany Supreme Court in September 2016;

*CJA, et al. v. JCOPE, et al.* (Article 78 proceeding/declaratory judgment/citizen-taxpayer action) commenced in Albany Supreme Court in June 2022;

*CJA, et al. v. Commission on Legislative, Judicial and Executive Compensation...Wilson, et al.* (Article 78 proceeding/declaratory judgment/citizen-taxpayer action) commenced in Albany Supreme Court in March 2024;

- (g) concealing the “on-the-job” performance of New York’s constitutional and other public officers with respect to the foregoing – and that it is dispositive of their unfitness for any office of public trust and that they must be indicted and will be convicted.

61. In tandem with this knowingly false journalism, by concealment,<sup>10</sup> defendants have affirmatively purported and implied that New York’s constitutional and other public officers are discharging their duties, are fit for re-election or election to other offices, or for appointments and reappointments, and that “public protection”/ethics and criminal entities are functioning. This, with knowledge of plaintiffs’ fully-documented ethics and criminal complaints against them that “public protection” authorities have been “sitting on”, or have dumped, without investigation – unreported by defendants.

62. The effect of defendants’ declarations of fidelity to fact-based, truthful, watchdog, accountability reporting that informs the public about what it needs to know about its government and public officers – because that is the role of a free press in a democracy – has been to further deceive the public that these officers are honest public servants because, were it otherwise, defendants would be reporting it.

63. Instead of truthful, accurate reporting that would have “stopped cold” the destruction of constitutional, lawful governance by New York’s constitutional officers of its three government branches, defendants abetted and perpetuated it by their *knowingly* false journalism and enabled the corrupters to continue their crimes, with impunity, including as a result of elections rigged by their

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<sup>10</sup> “Fraud may be committed by suppression of the truth, that is, by concealment, as well as by positive falsehood and misrepresentation. Where a failure to disclose a material fact is calculated to induce a false belief, the distinction between concealment and affirmative misrepresentation is tenuous; both are fraudulent.”, 60A New York Jurisprudence 2d §91: “Concealment Generally”; “the distinction between concealment and affirmative misrepresentation faded into legal insignificance, both being fraudulent”, Hadden v. Consolidated Edison Company of New York, 45 NY2d 466, 470 (1978).

First Amendment-violating journalism, depriving citizens of essential “knowledge of the comparative merits and demerits of the candidates for public trust”.<sup>11</sup>

64. Defendants’ refusal to report on plaintiffs’ [March 14<sup>th</sup>](#) and [March 17<sup>th</sup> e-mails](#) to Mamdani and [March 16<sup>th</sup> e-mail](#) to Hoylman-Sigal is because they know that the e-mails are true and that reporting on them would expose the corruption of each as constitutional officers of New York’s legislative branch – and, in so doing, the corruption of their fellow legislative constitutional officers, the corruption of New York’s four statewide executive branch constitutional officers, and the corruption of New York’s judicial branch constitutional officers, all collusive in destroying constitutional, lawful state governance – and would additionally expose their own press role in enabling the crimes of all these constitutional officers and their predecessors, year after year after year, by fraudulent journalism that covered up everything and rigged elections.<sup>12</sup>

65. Among the crimes of these constitutional officers:

[Penal Law §175.35](#): “Offering a false instrument for filing in the first degree”;  
[Penal Law §195.20](#): “Defrauding the government”;  
[Penal §190.65](#): “Scheme to defraud in the first degree”;  
[Penal Law §496.05](#) (“Public Trust Act): “Corrupting the government in the first degree”;  
[Penal Law §496.06](#) (“Public Trust Act): “Public corruption”;  
[Penal Law §155.42](#): “Grand larceny in the first degree”;  
[Penal Law §460.20](#): “Enterprise corruption”;  
[Penal Law §110.00](#): “Attempt to commit a crime”;

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<sup>11</sup> “As Madison observed in 1800, just nine years after ratification of the First Amendment:

‘Let it be recollected, lastly, that the right of electing the members of the government constitutes more particularly the essence of a free and responsible government. The value and efficacy of this right depends on the knowledge of the comparative merits and demerits of the candidates for public trust, and on the equal freedom, consequently, of examining and discussing these merits and demerits of the candidates respectively.’ 4 J. Elliot, *Debates on the Federal Constitution* 575 (1861).”, [Harte-Hanks Communications, Inc. v. Connaughton](#), 491 U.S. 657, 687 (1989).

<sup>12</sup> The evidence of this year after year after year election-rigging by the press is the fourth topic of CJA’s “[Special Topics](#)” webpage, entitled “SKEWING & SUBVERTING THE ELECTORAL PROCESS: [Chronicle of Press Election-Rigging](#)”.

[Penal Law §195](#): “Official misconduct”;

[Penal Law §105.15](#): “Conspiracy in the second degree”;

[Penal Law §20.00](#): “Criminal liability for conduct of another”

and such were identified, for example, by plaintiffs’ [June 9, 2020 grand jury/public corruption complaint to the Queens D.A.](#), their [June 9, 2020 grand jury/public corruption complaint to the Manhattan D.A.](#), and their [July 18, 2024 grand jury/public corruption complaint to all 62 D.A.s.](#), which the D.A.s have been “sitting on”, preventing inquiry by grand juries of the “wilful misconduct in office” of Mamdani, Hoylman-Sigal, and their fellow constitutional officers, current and past, pursuant to [Article I, §6 of the New York State Constitution](#).<sup>13</sup>

66. That grand juries would swiftly hand down indictments against Mamdani, Hoylman-Sigal, and their brethren, present and past, pursuant to Article I, §6 and [Criminal Procedure Law Article 190](#), and that trial juries would swiftly convict is obvious from the complaints – and from plaintiffs’ e-mails to Mamdani and Hoylman-Sigal in March of this year, embodying them and furnishing plaintiffs’ written testimony submitted for the Legislature’s FY2025-2026 budget hearings on [February 4<sup>th</sup>](#), [February 13<sup>th</sup>](#), and [February 25<sup>th</sup>](#), *expressly* for their responses. The

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<sup>13</sup> Article I, §6 reads, in pertinent part:

“...any public officer who, upon being called before a grand jury to testify concerning the conduct of his or her present office or of any public office held by him or her within five years prior to such grand jury call to testify, or the performance of his or her official duties in any such present or prior offices, refuses to sign a waiver of immunity against subsequent criminal prosecution, or to answer any relevant question concerning such matters before such grand jury, shall by virtue of such refusal, be disqualified from holding any other public office or public employment for a period of five years from the date of such refusal to sign a waiver of immunity against subsequent prosecution, or to answer any relevant question concerning such matters before such grand jury, and shall be removed from his or her present office by the appropriate authority or shall forfeit his or her present office at the suit of the attorney-general.

The power of grand juries to inquire into the wilful misconduct in office of public officers, and to find indictments or to direct the filing of informations in connection with such inquiries, shall never be suspended or impaired by law. No person shall be deprived of life, liberty or property without due process of law.” (underlining added).

subsequent votes of Mamdani and Hoylman-Sigal in May approving the FY2025-2026 state budget bills reinforce and add to their crimes.

67. Plaintiffs’ e-mails to defendants, this year and in past years – when compared to defendants’ contemporaneous and subsequent reporting and editorializing – establish plaintiffs’ entitlement to summary judgment on a cause of action for “journalistic fraud” as to each defendant, consistent with “[\*Journalistic Malpractice: Suing Jayson Blair and the New York Times for Fraud and Negligence\*](#)”, 14 [\*Fordham Intellectual Property, Media & Entertainment Law Journal\*](#) 1 (2003-2004) by Professors Clay Calvert & Robert D. Richards.

68. These e-mails additionally establish the absolute necessity that such cause of action be judicially recognized,<sup>14</sup> as there is otherwise NO means by which plaintiffs and the public can be protected from *knowingly* false journalism of “the fourth estate” – the press – whose effect has been, demonstrably, to enable, facilitate, and perpetuate the subversion of constitutional, lawful governance by the three government branches, all four of them not checking each other, but colluding against the People, which has been “kept in the dark”, totally, about what has been going on – and the vast, irreparable injury they have suffered.

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<sup>14</sup> [\*Brown v. State of New York\*](#), 89 NY2d 172, 181-182 (1996):

“it is well to recognize that the word tort has no established meaning in the law. Broadly speaking, a tort is a civil wrong other than a breach of contract (*see*, Prosser and Keeton, *op. cit.*, §1). There are no fixed categories of torts, however, and no restrictive definitions of the term (*see*, [\*Advance Music Corp. v American Tobacco Co.\*](#), 296 N.Y. 79; *see also*, Prosser and Keeton, *op. cit.*). Indeed, there is no necessity that a tort have a name; new torts are constantly being recognized (*see*, the extensive analysis by Justice Breitel, as he then was, in [\*Morrison v National Broadcasting Co.\*](#), 24 AD2d 284, *revd on other grounds* 19 N.Y.2d 453; *see also*, 16 ALR3d 1175). Tort law is best defined as a set of general principles which, according to Prosser and Keeton, occupies a ‘large residuary field’ of law remaining after other more clearly defined branches of the law are eliminated. (Prosser and Keeton, *op. cit.*, §1, at 2.)”

**SECOND CAUSE OF ACTION**  
**INSTITUTIONAL RECKLESS DISREGARD FOR TRUTH**

69. Plaintiffs repeat, reiterate, and reallege ¶¶1-68 herein with the same force and effect as if more fully set forth.

70. Plaintiffs' e-mails to defendants, when compared to defendants' contemporaneous and subsequent reporting and editorializing, also establish plaintiffs' entitlement to summary judgment on an "institutional reckless disregard for truth" cause of action, as to each defendant, consistent with "[\*Institutional Reckless Disregard for Truth in Public Defamation Actions against the Press\*](#)", 90 [\*Iowa Law Review\*](#) 887 (March 2005), by Professor Randall P. Bezanson & Gilbert Cranberg.

71. In lieu of truth, defendants adhere to largely identical false narratives about public officers and governmental functioning, despite the rebutting evidence which plaintiffs have furnished them, repeatedly – including at supervisory and management levels.

72. Defendants, all of whom have refused to account for their journalism, suffer from a multitude of financial and other conflicts of interest, institutionally and otherwise, not a single one of which they have ever disclosed, and for which they jettison truth.

73. Institutionally, they are beneficiaries of the corruption of constitutional, lawful state governance they refuse to report. For example, they benefit from a state legislature that does not oversee how they operate, and which, instead, without the slightest legislative due process, unconstitutionally and unlawfully inserted, into last year's FY2024-2025 state budget, *via* behind-closed-doors "three-men-in-a-room", amending-of-bills-dealmaking, a provision for \$90 million in tax credits for local media, whose Senate sponsor was Hoylman-Sigal.<sup>15</sup> Also, into this year's

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<sup>15</sup> See CJA's webpage "[The unconstitutional enactment in the FY2024-2025 state budget of the 'Newspaper & Broadcast Media Jobs Program'](#)".

FY2025-2026 state budget, \$4 million in taxpayer monies was inserted for public radio stations, unconstitutionally and unlawfully, and without the slightest legislative due process, *via* behind-closed-doors “three-men-in-a-room” amending-of-bills dealmaking.<sup>16</sup>

74. Neither of these insertions would have been possible without the state judiciary “throwing” plaintiffs’ successive lawsuits suing the Legislature and Governor for precisely this kind of flagrant corrupting of the state budget – lawsuits brought “on behalf of the People of the State of New York & the Public Interest” to which plaintiffs had a summary judgment entitlement to all causes of action.

75. Two prior examples of the press reaping the benefit of a judiciary “throwing” cases are plaintiffs’ two public interest lawsuits against Defendant NYT and against Gannett to establish the causes of action for “journalistic fraud” and “institutional reckless disregard for truth”, in addition to recovery for libel, “thrown” by fraudulent decisions.

76. In return, the press has shown its appreciation to the judiciary, as, for example, by editorial support of pay raises for judges. This has been in tandem with refusing to report, let alone investigate the merit of, citizen opposition to such raises based on judicial corruption and the “throwing” of cases, without redress – such as plaintiffs have spearheaded for decades.

77. Recognition of an “institutional reckless disregard for truth” cause of action is a complement to the “journalistic fraud” cause of action – both aimed at restoring the meaning and intent of the “free press” guarantee of the First Amendment that defendants have trashed.

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<sup>16</sup> See CJA’s webpage “[The unconstitutional \\$4M for public radio stations added to the FY2025-2026 state budget](#)”.

**THIRD CAUSE OF ACTION**  
**DEFRAUDING PURCHASERS, CONTRIBUTORS,**  
**& TAXPAYERS**

78. Plaintiffs repeat, reiterate, and reallege ¶¶1-77 herein with the same force and effect as if more fully set forth.

79. Defendants’ representations about their journalism on their websites, in their printed publications, and elsewhere, *to wit*, that it is fact-based, accurate, truthful, reliable, trustworthy, unbiased, untainted by conflicts of interest, that they do not flinch in exposing governmental corruption and abuses are false – and *knowingly* so – established by plaintiffs’ e-mails to them, above-recited and linked.

80. Such representations – and of their compliance with journalistic codes of ethics – are intended to deceive the public into believing that defendants’ journalism is worthy of purchase, donations, philanthropic support, and tax exemptions, when, in fact, it is not – because, on the most fundamental, threshold issues pertaining to the integrity of government processes, public officers, and candidates, devoid of partisanship and ideology, they outrightly lie and misinform. In other words, defendants’ assertions about themselves are false and misleading advertising claims,<sup>17</sup> which this cause of action seeks to deal with accordingly.

81. Even rudimentary examination of defendants’ print and broadcast journalism reveals, as to most of them, a palpable, if not flagrant, left and hard-left bias, in their story selections and content. This is particularly so of the defendants purporting to be nonpartisan, nonprofit entities and

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<sup>17</sup> New York [General Business Law, Article 22-A, §349](#) “Deceptive acts and practices unlawful” and [§350](#) “False advertising, unlawful”, [New York City Administrative Code §20-700](#) “Unfair trade practices prohibited” bars “any deceptive or unconscionable trade practice in the sale...of in the offering for sale...of any consumer goods or services”. [§20-705](#) makes explicit that it includes “any publisher or printer of a newspaper, magazine, or other form of printed advertising, who...is guilty of deception on the sale or offering for sale of its own services”. (underlining added).

which, based thereon, obtain 501(c)(3) tax-exempt status and confer that benefit to subscribers and contributors whose donations are then tax-deductible.

82. Defendants ProPUBLICA, NY FOCUS, and THE CITY are among these “nonpartisan” 501(c)(3) tax-exempt entities and are members of the [Institute for Nonprofit News](#) (INN). By a [June 16, 2023 complaint](#) to INN, which is itself 501(c)(3) tax-exempt, plaintiffs filed a complaint against these three INN members and seven others, seeking determination as to:

- “(1) whether these ten INN members have comported themselves in a manner remotely consistent with [INN standards](#), the [Code of Ethics of the Society of Professional Journalists](#), and with what their websites purport about themselves;
- (2) whether these ten INN members, by their websites and solicitations, are defrauding citizens and philanthropies into making monetary donations based on representations about themselves and their journalism that are materially false;
- (3) whether these ten New York INN members are, in fact, partisan, some flagrantly so, in violation of their 501(c)(3) tax status, thereby defrauding the IRS.<sup>fn</sup>” (hyperlinking in the original).

83. There was no response from Defendants ProPUBLICA, NY FOCUS, and THE CITY,<sup>18</sup> nor from the seven other complained-against INN members. Nor did INN respond, other than 16 months later by deceit, which plaintiffs exposed as such.<sup>19</sup>

84. Consequently, by this cause of action, plaintiffs seek determinations of the three questions it asked of INN as to Defendants ProPUBLICA, NY FOCUS, and THE CITY, as to which there is NO other means to secure redress, consumer protection, and the cessation of monies belonging to the federal treasury wrongfully made tax deductible.

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<sup>18</sup> Plaintiffs’ [June 16, 2023 e-mail to Defendant ProPUBLICA](#); [June 16, 2023 e-mail to Defendant NY FOCUS](#); [June 18, 2023 e-mail to Defendant THE CITY](#).

<sup>19</sup> CJA’s webpage posting the record of the June 16, 2023 complaint is [here](#) – and is part of the second link on CJA’s “[Special Topics](#)” menu webpage: “BRINGING ACCOUNTABILITY TO NEW YORK’S PUBLIC MEDIA”.

85. As for the other defendants which are 501(c)(3) tax-exempt entities, such as Defendant WNYC, which is an NPR member station, and Defendants WMHT, WCNY, and WNET, which are PBS member stations, plaintiffs filed complaints with the NPR and PBS public editors:

- a [May 8, 2023 complaint](#) against Defendant WNYC and its Gothamist to the NPR public editor, to which there was no response from anyone – and, thereafter, a [September 17, 2024 second complaint](#), to which there was no response from anyone;
- a [May 15, 2023 complaint](#) against Defendants WMHT and WCNY, and, thereafter, a [September 18, 2024 second complaint](#) against Defendants WMHT and WCNY, plus Defendant WNET, both its CHANNEL THIRTEEN and WLIW, to which there was no response from anyone.

86. Likewise, there was no response to these complaints from the NPR and PBS presidents and management, or, thereafter, from the Corporation for Public Broadcasting’s Inspector General – a state of affairs plaintiffs then brought to the attention of House DOGE Subcommittee Chair Greene and FCC Chair Carr by their [February 18, 2025 letter](#) “Defunding NPR, PBS – & Firing the CPB’s Inspector General, for starters”, to which, likewise, there was no response.<sup>20</sup>

87. Notwithstanding the defunding of NPR and PBS, Defendant WNYC and its Gothamist, Defendant WMHT and its New York NOW, Defendant WCNY and its Capitol Pressroom, and Defendant WNET-CHANNEL THIRTEEN and WLIW continue on, and continue their solicitations of financial support from the public and philanthropies based on false and misleading advertising claims. This cause of action, therefore, seeks appropriate redress, otherwise unavailable, including of their 501(c)(3) status.

88. Finally, as to Defendant CUNY Graduate J-School, with its NYCITY NEWS SERVICE, funded by New York taxpayers and philanthropic donations on the premise that it

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<sup>20</sup> This is also part of CJA’s “[Special Topics](#)”, whose second topic is “BRINGING ACCOUNTABILITY TO NEW YORK’S PUBLIC MEDIA”, with links to CJA’s webpages for the [May 8, 2023 complaint](#), the [May 15, 2023 complaint](#), the [CPB Inspector General](#), and the odyssey of the [February 18, 2025 letter](#).

adheres to First Amendment responsibilities and journalism codes, this cause of action seeks redress for their fraud upon taxpayers and philanthropies, upon its students, and upon consumers of their journalism. The particulars of this are set forth by plaintiffs' [September 5, 2025 e-mail](#) to it entitled "The partnering of the Craig Newmark Graduate School of Journalism at CUNY with NY-1 for three election debates in October, announced by the NYC Campaign Finance Board". By a second [September 5, 2025 e-mail](#), Plaintiff SASSOWER resent it from her personal e-mail, upon its bounce-back, due to blocking, with a message reciting further incriminating particulars pertaining to plaintiffs' [November 3, 2022 complaint](#) to the J-School's dean for enforcement of the [Code of Ethics](#) it requires its students to sign – to which the J-School's sole response had been to put a block on e-mail from Plaintiff SASSOWER's professional e-mail address, followed by a false pretense by CUNY's general counsel/senior vice chancellor for legal affairs that the complaint was a FOIL request that he was denying.<sup>21</sup> There is NO otherwise available redress.

#### **FOURTH CAUSE OF ACTION** **CONSPIRACY**

89. Plaintiffs repeat, reiterate, and reallege ¶¶1-88 herein with the same force and effect as if more fully set forth.

90. Plaintiffs' above-recited and linked e-mails to defendants, when compared to defendants' contemporaneous and subsequent reporting and editorializing, establish a conspiratorial enterprise, only possible because all colluded in the same *knowingly* false, corruption-abetting, election-rigging journalism.

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<sup>21</sup> See CJA's webpage for CUNY's Craig Newmark Graduate School of Journalism, [here](#), which is part of CJA's "[Special Topics](#)", by its third link for "BUILDING HONEST MEDIA SCHOLARSHIP: [Academic Institutes & Universities](#)".

91. Had any one defendant – or any of the myriad of other press to which plaintiffs turned this year, or over so many decades – discharged the slightest First Amendment responsibilities and journalistic duties of truthful, accurate reporting, consistent with the claims they make about themselves, the whole “gaslighting”, “house of cards” of their journalism and its pernicious subverting of the constitutionality and lawfulness of New York state governance and a “Republican Form of Government”, abetted by journalism schools and institutes which they control, would have been exposed.

92. In contrast to defendants’ news coverage of Israel, which, at least as to those defendants that are not discernibly left provide reasonably accurate, truthful reporting, all defendants and such other press with which plaintiffs have interacted are lock-step in concealing the unconstitutionality and unlawfulness of New York state governance, in protecting the culpable public officers from the consequences of their crimes, and in rigging elections.

### **STATEMENT IN FURTHER SUPPORT**

93. Acting on their own behalf and on behalf of “the People of the State of New York & the Public Interest”, plaintiffs seek the redress that the United States Constitution expressly provides by the guarantee clause of Article IV, §4, “The United States shall guarantee to every State in this Union a Republican Form of Government...”, through the First Amendment’s guarantee of “the right of the people...to petition the Government for a redress of grievances”, and the further guarantees to every “person”, by the Fifth and Fourteenth Amendments, of due process and equal protection.

94. Based on these provisions – and the facts hereinabove summarized, with evidence – plaintiffs are here suing defendants for violating their “free press” First Amendment responsibilities

by *knowingly* false journalism, concealing from the People of New York the true state of their state government, *to wit*, that New York’s “Republican Form of Government” no longer exists because the state’s highest constitutional officers of its three government branches have been colluding with each other in flagrantly violating the state’s Constitution, laws, and rules, eviscerating mandated checks and balances, including by “public protection”/ethics and criminal entities that insulate them from any consequence for violations – and that, in so doing, these defendants have been, and are now, rigging New York elections.

95. The foregoing provides plaintiffs with standing and establishes injury, which, as to the latter, is further particularized, as follows:

(a) As to Plaintiff SASSOWER, the corruption of New York’s judiciary, of constitutional, lawful state governance, and the complicity of the press, including many that are defendants herein, destroyed the lives and professional careers of her patriotic and courageous judicial whistle-blowing parents, both lawyers, George Sassower, Esq. and Doris L. Sassower, Esq., impacting irreparably and deleteriously upon their three daughters and, as to the oldest, Plaintiff SASSOWER, destroying and derailing her own life and career, beginning when she was a child – and she is now 69.

(b) As to Plaintiff CJA, the violation of First Amendment responsibilities and journalistic codes by the press, including most of the defendants herein, has meant that all its hard, painstaking work, spanning more than three decades, has brought no corruption-eradicating changes – when even a modicum of press adherence to such responsibilities and codes, of which there was none, could have brought sweeping corruption-eradicating changes, speedily – and simply by government fidelity to the constitutional provisions, laws, and rules being violated. The near total press suppression of any report of Plaintiff CJA’s work, other than in minimizing, deprecating terms,

deprived it of any public profile and appreciation – and all the benefits flowing therefrom to its development as a non-partisan, non-profit citizens’ organization, needing membership and funding.

(c) As to “the People of the State of New York”, they have been kept “clueless” by their “free press” as to how they have been betrayed by their elected and appointed constitutional officers in their three government branches whose flagrant violations of their oaths of office, the state Constitution, laws, and rules, steal their money, massively, and enact and enable the enactment of policies, without legislative due process and by fraud, including as relates to elections, destroying a “Republican Form of Government”. As journalism is the “first draft of history”, the state’s history and that of its People has been falsified by its “free press”, relied upon by scholars in the belief that it is accurate and true, and by the culpable journalists themselves, many of whom go on to write books.

### **PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiffs seek the following:

**As to the FIRST CAUSE OF ACTION: JOURNALISTIC FRAUD**, declarations as to each defendant, with compensatory, presumed, and punitive damages to be calculated by a jury, for the corporate plaintiff, for the individual plaintiff, and for “the People of the State of New York & the Public Interest”, such to specifically include:

- \$1 billion in compensatory damages, representing an approximate sum of the taxpayer monies already paid out to judges, legislators, executive officers, and D.A.s, based on the 2011, 2015, 2018, 2023, and 2024 compensation commission/committee reports, whose facial violations and frauds defendants have refused to report, knowing they mandate voiding, *as a matter of law*;
- \$1 billion in punitive damages, representing an approximate sum of taxpayer monies that, since 2013, are the cumulative legislative “reappropriations” that the governor has popped into combined legislative/judiciary budget bills, in an out-of-sequence, mistitled section at the back of those bills, that defendants have refused to report;

- \$1 billion in punitive damages, from relevant defendants, for their “journalistic fraud” in covering up and abetting the corruption of the 2013 Commission to Investigate Public Corruption – robbing the People of the State of New York of rectification, *at that time*, of all the aspects of the corruption of constitutional, lawful state governance hereinabove summarized, starting with the “public protection”/criminal and ethics entities;
- \$1 billion in punitive damages for defendants’ rigging of each election, spanning decades, by concealing the corruption, in office, of candidates on the ballots for state, county, and New York City offices, which they refused to report;

**As to the SECOND CAUSE OF ACTION: INSTITUTIONAL RECKLESS**

**DISREGARD FOR TRUTH**, declarations as to each defendant, with compensatory, presumed, and punitive damages, consistent with the evidence, to be calculated by a jury, for the corporate plaintiff, for the individual plaintiff, and for “the People of the State of New York & the Public Interest”, such to specifically include:

- \$1 billion in compensatory damages, representing an approximate sum of the taxpayer monies already paid out to judges, legislators, executive officers, and D.A.s, based on the 2011, 2015, 2018, 2023, and 2024 compensation commission/committee reports, whose facial violations and frauds defendants have refused to report knowing they mandate voiding, *as a matter of law*;
- \$1 billion in punitive damages, representing an approximate sum of taxpayer monies that, since 2013, are the cumulative legislative “reappropriations” that the governor has popped into combined legislative/judiciary budget bills, in an out-of-sequence, mistitled section at the back of those bills, that defendants have refused to report;
- \$1 billion in punitive damages, from relevant defendants, for their “journalistic fraud” in covering up and abetting the corruption of the 2013 Commission to Investigate Public Corruption – robbing the People of the State of New York of rectification, *at that time*, of all the aspects of the corruption of constitutional, lawful state governance hereinabove summarized, starting with the “public protection”/criminal and ethics entities;
- \$1 billion in punitive damages for defendants’ rigging of each election, spanning decades, by concealing the corruption, in office, of candidates on the ballots for state, county, and New York City offices, which they refused to report;

**As to the THIRD CAUSE OF ACTION: DEFRAUDING PURCHASERS, CONTRIBUTORS, & TAXPAYERS,** declarations as to each defendant, with compensatory, presumed, and punitive damages, consistent with the evidence, to be calculated by a jury, for the corporate plaintiff, for the individual plaintiff, and for “the People of the State of New York & the Public Interest”;

**As to the FOURTH CAUSE OF ACTION: CONSPIRACY,** declarations as to each defendant, with compensatory, presumed, and punitive damages, consistent with the evidence, to be calculated by a jury, for the corporate plaintiff, for the individual plaintiff, and for “the People of the State of New York & the Public Interest”;

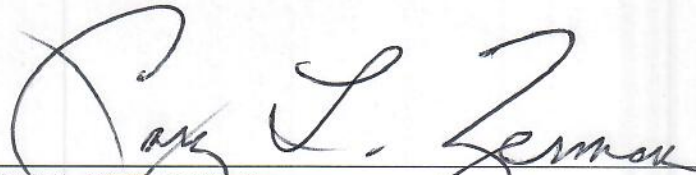
**SUCH OTHER & FURTHER RELIEF AS MAY BE JUST & PROPER,** and, specifically,

- i. referring defendants to the U.S. Department of Justice and Federal Communications Commission for investigation and prosecution of their frauds and conspiracy crimes;
- ii. attorneys fees, costs, and expenses.



Plaintiff *Pro Se* ELENA RUTH SASSOWER, individually and as director of the Center for Judicial Accountability, Inc., *and on behalf of the People of the State of New York & the Public Interest*

Dated: October 29, 2025  
White Plains, New York

A handwritten signature in black ink, reading "Gary L. Zerman". The signature is written in a cursive style with a large initial "G".

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GARY L. ZERMAN, Esq.  
Attorney for Plaintiff CENTER FOR JUDICIAL ACCOUNTABILITY, Inc.,  
*and on behalf of the People of the State of New York & the Public Interest*

Dated: January 5, 2026  
Valencia, California

**VERIFICATION & CERTIFICATION**

STATE OF NEW YORK )  
COUNTY OF WESTCHESTER ) ss:

I am the individual plaintiff in the within action and director of the corporate plaintiff Center for Judicial Accountability, Inc. I have written the foregoing Amended Complaint and attest, under penalties of perjury, that same is true and correct of my own knowledge and information and, as to those allegations, upon information and belief, I believe them to be true and correct.

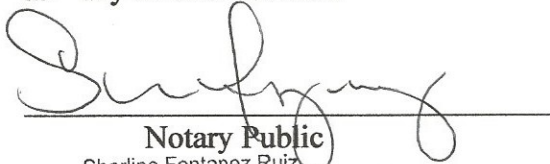
I additionally certify that the Amended Complaint does not violate and complies with the requirements of [Rule 11 of the Federal Rules of Civil Procedure](#).

As further required, I agree to notify the Clerk’s Office of any change to my mailing address – and understand that my failure to keep a current address on file with the Clerk’s Office may result in dismissal of my case.



ELENA RUTH SASSOWER  
10 Stewart Place, Apt. 2D-E  
White Plains, Westchester County  
New York 10603  
914-421-1200  
elena@judgewatch.org

Sworn to before me this  
29<sup>th</sup> day of October 2025



**Notary Public**  
Sharline Fontanez Ruiz  
Notary Public, State of New York  
Qualified in Westchester County  
No. 04FO641862

Commission Expires December 16, 2027