

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

ZOHRAN MAMANI, Plaintiff,

-against-

ELISE STEFANIK, Defendant.

Index No.: [To Be Assigned]

COMPLAINT

INTRODUCTION

1. This is an action for defamation arising from Defendant Elise Stefanik's repeated, false, and malicious public statements accusing Plaintiff Zohran Mamdani of being an "anti-Semite." These baseless smears, disseminated through social media, television interviews, press releases, and other public forums, were made with actual malice—knowledge of their falsity or reckless disregard for the truth—and were intended to harm Mamdani's reputation as a dedicated public servant, elected official, and Democratic nominee for Mayor of New York City.
2. Stefanik's accusations are not isolated but part of a pattern of inflammatory rhetoric targeting Muslims, Palestinians, and critics of Israeli policies, demonstrating her bias and intent to defame individuals like Mamdani, a proud Muslim American of Ugandan descent who has consistently condemned anti-Semitism and advocated for interfaith unity.
3. As a direct result of Stefanik's defamatory statements, Mamdani has suffered severe reputational harm, emotional distress, lost professional opportunities, and other damages in an amount to be proven at trial.

PARTIES

4. Plaintiff Zohran Mamdani is an individual residing in Queens County, New York. He is a member of the New York State Assembly representing the 36th Assembly District and the Democratic nominee for Mayor of New York City. Mamdani is a committed public servant who has dedicated his career to issues of housing affordability, public safety, and civil rights, including combating all forms of bigotry, including anti-Semitism.
5. Defendant Elise Stefanik is an individual residing in Saratoga County, New York. She is a member of the United States House of Representatives representing New York's 21st Congressional District and Chairwoman of House Republican Leadership. Stefanik maintains offices in Washington, D.C., and New York, and regularly disseminates public statements through social media, press releases, and media appearances that reach a nationwide audience.

JURISDICTION AND VENUE

6. This Court has subject matter jurisdiction over this action pursuant to New York Civil Practice Law and Rules ("CPLR") § 301, as the claims arise under New York law and the parties are subject to personal jurisdiction in New York.
7. Venue is proper in New York County pursuant to CPLR § 503(a) because Plaintiff resides in New York, a substantial part of the events giving rise to the claims occurred in New York (including the dissemination and impact of the defamatory statements), and Defendant regularly conducts business and maintains an official residence in New York.

FACTUAL ALLEGATIONS

8. Mamdani is a Muslim American who has built a career in public service rooted in principles of equity, justice, and inclusivity. He has publicly condemned anti-Semitism on multiple occasions, supported Jewish community initiatives, and worked across faith lines to address hate in all its forms. At no time has Mamdani engaged in, endorsed, or tolerated anti-Semitic conduct or speech.
9. Stefanik, by contrast, has a well-documented history of disparaging comments and actions targeting Muslims, the Islamic faith, and Palestinian advocates, which evince actual malice in her targeted smears against Mamdani—a vocal critic of Israeli policies and advocate for Palestinian rights. These instances include:
 - a. On August 13, 2025, Stefanik publicly stated her strong support for designating the Muslim Brotherhood—a major Islamic organization—as a "terrorist organization," framing it as essential for "national security" in a manner that broadly stigmatizes Muslim political and religious expression.

- b. In June 2025, Stefanik accused the Council on American-Islamic Relations (CAIR)—a leading Muslim civil rights organization—of being a "terrorist organization" that "should be designated as such by the U.S. government," in direct response to CAIR's advocacy for Palestinian rights and criticism of Israel's actions in Gaza. This baseless smear was condemned by CAIR as "morally bankrupt" anti-Muslim and anti-Palestinian rhetoric intended to silence dissent.
 - c. Stefanik's May 2024 trip to Israel was funded by the Jewish Policy Center, a group whose board includes figures with histories of promoting anti-Muslim conspiracy theories and Islamophobic narratives.
 - d. In a December 2023 public letter, critics accused Stefanik of "fanning the flames of Islamophobia" through her alignment with figures promoting anti-Muslim tropes and her selective outrage over campus protests that ignored rising anti-Muslim incidents.
 - e. On May 19, 2024, in a speech to the Israeli Knesset, Stefanik accused pro-Palestinian activists of "calling for intifada and genocide" against Jews, equating legitimate criticism of Israeli policies with terrorism and broadly vilifying Muslim and Arab voices in the process.
 - f. During a January 21, 2025, confirmation hearing, Stefanik refused to affirm the Palestinian people's right to self-determination, instead praising Israel as a "beacon of human rights" while dismissing Palestinian advocacy as inherently illegitimate.
10. Stefanik's pattern of anti-Muslim and anti-Palestinian rhetoric demonstrates her knowledge that Mamdani—a Muslim elected official critical of Israel's occupation and a supporter of Palestinian rights—is an easy target for her smears, regardless of the truth. Her statements were not made in good faith but with deliberate intent to exploit Islamophobic tropes for political gain.
11. Beginning in August 2025 and continuing through September 2025, Stefanik unleashed a barrage of false accusations labeling Mamdani an "anti-Semite," disseminated to her over one million social media followers, national media outlets, and political allies. These statements were made in the context of Mamdani's mayoral campaign and Governor Kathy Hochul's endorsement of him, which Stefanik sought to undermine through character assassination. The specific defamatory statements include:
- a. On August 11, 2025, during a Fox News interview, Stefanik described Mamdani as a "raging, antisemite communist," falsely imputing hatred toward Jewish people to justify her political attacks.
 - b. On September 13, 2025, in a post on X (formerly Twitter), Stefanik wrote: "This is dangerous and absolutely outrageous from this Antisemite Communist who is on pace to destroy NYC," directly accusing Mamdani of anti-Semitism in a viral post viewed by hundreds of thousands.

- c. On September 15, 2025, in a statement covered by the Daily Wire and other outlets, Stefanik ripped into Governor Hochul for endorsing Mamdani, calling him a "raging Antisemite Communist" and warning of the "risks of communism and anti-Semitism in New York City."
 - d. On September 15, 2025, in a YouTube video and related social media content, Stefanik again labeled Mamdani a "raging anti-semite communist," tying the smear to his mayoral candidacy and falsely portraying him as a threat to public safety.
 - e. On September 16, 2025, in a Facebook post, Stefanik wrote: "Antisemite Communist Mamdani pledged to arrest Israeli Prime Minister Bibi Netanyahu if he came to NYC," falsely equating Mamdani's criticism of Israeli policies with anti-Semitic hatred and promoting the post to her followers.
 - f. On September 16, 2025, in an X post, Stefanik reiterated: "Antisemite Communist Mamdani pledged to arrest Israeli Prime Minister Bibi Netanyahu," amplifying the libel to over 300,000 views and including images to maximize dissemination.
12. Each of these statements is false: Mamdani has never expressed or acted upon anti-Semitic views. Stefanik made these accusations with actual malice, as evidenced by her history of anti-Muslim bias and her failure to conduct any reasonable investigation into Mamdani's record before publishing them.
13. The defamatory statements were published to third parties via Stefanik's substantial social media platforms, television appearances, and press releases, reaching a global audience and causing immediate backlash against Mamdani, including online harassment, media scrutiny, and damage to his mayoral campaign.
14. As a public figure, Mamdani must prove actual malice to prevail on his defamation claim, which he can and will establish through the foregoing facts.

FIRST CAUSE OF ACTION: Libel (Written Defamation)

15. Plaintiff repeats and realleges paragraphs 1 through 14 as if fully set forth herein.
16. Each of the written statements identified in paragraphs 11(a)-(f) above constitutes libel per se, as they falsely charge Mamdani with a serious crime or moral turpitude (anti-Semitism) and expose him to public contempt, ridicule, and professional harm.
17. The statements were published without privilege or justification and with actual malice.
18. As a direct and proximate result, Mamdani has suffered damages, including harm to his reputation, emotional distress, and economic losses, in an amount exceeding \$10,000,000.

SECOND CAUSE OF ACTION: Slander (Spoken Defamation)

19. Plaintiff repeats and realleges paragraphs 1 through 14 as if fully set forth herein.
20. Stefanik's August 11, 2025, Fox News statement (paragraph 11(a)) constitutes slander per se for the reasons stated in paragraph 16.
21. The statement was published without privilege or justification and with actual malice.
22. As a direct and proximate result, Mamdani has suffered damages as set forth in paragraph 18.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment against Defendant as follows:

- a. Compensatory damages in the amount of \$10,000,000;
- b. Punitive damages in the amount of \$10,000,000;
- c. An order enjoining Defendant from further defamatory statements about Plaintiff;
- d. Costs, disbursements, and attorneys' fees; and
- e. Such other relief as the Court deems just and proper.

Dated: October 5, 2025