

CAMBRIDGE DISTRICT COURT

CASE NUMBER: 1152cr001382

COMMONWEALTH)
VS.)
LOTFOLAH AFRASIABI)

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U.S. District Court,
EDNY, Brooklyn
Jul 23, 2023, 1:35 PM
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**DEFENDANT'S MOTION IN LIMINE FOR VIDEO TESTIMONY OF PROFESSOR NOAM CHOMSKY
REGARDING HIS COLLABORATION WITH DEFENDANT ON THE RELEASE OF US HOSTAGE**

Now comes the Defendant, Afrasiabi, Pro Se, and moves the Honorable Court to allow video testimony of Professor Noam Chomsky, who is in retirement in Arizona and due to his old age and frail health unable to testify at trial.

As grounds for this Motion, Defendant states the following:

- (a) Professor Chomsky is a world-renowned professor emeritus of Linguistics at Massachusetts Institute of Technology (M.I.T.).
- (b) Defendant knows Professor Chomsky for a long time, has conducted two interviews with him, and has a blurb from Professor Chomsky on the cover of his book, Looking For Rights At Harvard (2010).
- (c) In 2008-2009, Defendant and Professor Chomsky collaborated for the release of three American hikers held in Iran. Per the Defendant's initiative, Professor Chomsky wrote a

letter to Iran's President calling for the release of the three Americans. Afrasiabi then submitted to the Iranian authorities and followed-up on it and, fortunately, received a positive response. Afrasiabi used his rapport with Iran's Mission repeatedly on behalf of the US hostages in Iran, including the FBI agent missing in Iran, Professor Haleh Esfandiari of Wilson Center, and the three American hikers, thus acting in American national interests.

(d) Professor Chomsky has recently written a letter to the court confirming the above-stated facts about the three American hikers. See Exhibits No. 1 and 2: Chomsky's Letter to Iran's President, and Chomsky's letter to Court.

(e) In light of the government's accusation of Afrasiabi as a "national security threat," e.g., in the Criminal Complaint, Professor Chomsky's testimony is crucial in establishing the sheer absurdity of this false allegation and in providing material evidence to the contrary, that is, Afrasiabi's record of assisting the US objectives toward Iran, thus acting as a national security asset.

Wherefore, Defendant prays the court to allow the video testimony of Professor Chomsky, who is 94 years old and unable to travel to New York.

Respectfully Submitted,

Lotfolah K. Afrasiabi, Pro Se
Date: July 19, 2023
CC: US attorney, Sara Winik, Ian Richardson.

H.E. Dr. Mahmoud Ahmadinejad
President, Islamic Republic of Iran
Palestine Avenue, Azerbaijan Intersection,
Tehran, Islamic Republic of Iran

September 13, 2010

Dear President Ahmadinejad,

I have learned of your intervention to assist Sarah in her plight, and to make it possible for her to return to her family. I am only one of a great many people who deeply appreciate these kind and humane efforts.

I would like to urge, once again, that you do what you can to ensure that that her companions, Shane and Josh, are released as well. They are idealistic young men, innocent of any crime with the possible exception of unwittingly crossing the border.

Shane, Sarah, and Josh have spoken out against aggressive foreign policies of the United States. Their good deeds and compassionate acts are well documented. They deserve some long overdue compassion in return. I realize the tensions between the US and Iran are acute and rooted in a difficult and often shameful history, but these innocent young people should not have to suffer from these painful events, which we all hope will soon reach a peaceful and honorable resolution.

I hope that the government and judiciary will come to recognize that there is no reason to detain these young men, and will allow them to return to their anxious and grieving families, an act of compassion that will be welcomed with great gratitude and appreciation throughout the world by those who wish the best for the people of Iran and the United States.

Sincerely,

Noam Chomsky



Institute Professor, Retired

MIT

Cambridge MASS

Letter of Professor Noam Chomsky to Court, September 27, 2022

Noam Chomsky <chomsky@mit.edu>
To: talia_magnas@nyed.uscourts.gov
Tue, Sep 27 at 11:59 AM

I am writing in connection with the case of Kaveh Afrasiabi, a long-time colleague, and more specifically, in connection with our involvement in the affair of the three young American hikers – Shane Bauer, Sarah Shourd, and Josh Fattal – who were detained by Iranian border guards when they accidentally crossed into Iran, then imprisoned. I was personally involved in the efforts to obtain their release, and knowing that Professor Afrasiabi had some Iranian contacts, I asked him for suggestions about how to help. He was very forthcoming. Apart from suggestions, he tried as best he could to intervene personally to expedite their quick release from imprisonment, another of many illustrations of his engagement in human rights activities in Iran and elsewhere. In this particular case his intervention was not only very welcome to all of us but apparently also of assistance in obtaining their release.

Noam Chomsky
Institute Professor emeritus, MIT
Laureate Professor, U. of Arizona