

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

KAVEH AFRASIABI  
Plaintiff,

v.

Docket Number:

UNITED PRESS INTERNATIONAL, and  
STRUAN STEVENSON  
Defendants,

**COMPLAINT AND JURY DEMAND**

Plaintiff Kaveh Afrasiabi through his lawyer makes this complaint for libel and defamation and states as follows:

1. The plaintiff is Dr. Kaveh Afrasiabi who is a resident of the Commonwealth of Massachusetts.
2. The Defendant United Press International is a news corporation with its principal place of business in Washington, the District of Columbia and 1200 N. Federal Highway, Suite 200, Boca Raton, Florida 3343.
3. The defendant Struan Stevenson is a person who resides in the United Kingdom.

**JURISDICTION AND VENUE**

4. This Court has jurisdiction over this complaint pursuant to 28 U.S.C. § 1332 as there is diversity of citizenship between the parties and the amount of damages alleged is greater than seventy five thousand dollars.

5. The United States District Court for the District of Massachusetts is the appropriate venue for this case pursuant to 28 U.S.C. § 1391 because the plaintiff is a resident of the District of Massachusetts.

### **FACTS**

6. Dr. Afrasiabi is a political scientist and expert in the field of international relations with a specialized knowledge of middle eastern affairs, in particular the nation of Iran and U.S.-Iranian relations.
7. Dr. Afrasiabi gained a PhD in political science from Boston University with a thesis titled “State and Populism in Iran” under the supervision of famed historian Howard Zinn. Afrasiabi has also studied theology at Andover-Newton Theological School. His theological writings have been praised by Bishop John Chane as a “must read” in his introduction to Afrasiabi’s book, titled Mahdism, Shiism, and Communicative Eco-Theology (2015).
8. He is the author of several books on Iran, Islam, ecology, Middle East, UN reform, as well as poetry and fiction.
9. He has authored scores of articles in international newspapers and journals; and has penned many op-ed pieces in dozens of established newspapers and respected publications including the New York Times, the Washington Post, Boston Globe and multiple other international publications.
10. Afrasiabi is the founder and director of a non-government organization, Global Interfaith Peace (GIP). The purpose of GIP is to enhance understanding, dialogue, tolerance and communication among the world’s religions and to complement the

activities of the United Nations in peacemaking by eventually providing an auxiliary faith-based support.

11. Afrasiabi has taught political science at the University of Tehran, Boston University, and Bentley University. Afrasiabi has been a visiting scholar at Harvard University (1989-1990), University of California, Berkeley (2000-2001), Binghamton University (2001-2002) and the Center for Strategic Research, Tehran. During 2004-2005, Afrasiabi was involved as an advisor to Iran's nuclear negotiation team.
12. Afrasiabi is a former consultant to the United Nations. He worked on "Dialogue Among Civilizations", for which he interviewed the former Iranian president, Mohammed Khatami. Afrasiabi was the chairman of the World Youth Festival on Dialogue Among Civilizations in Vilnius, Lithuania, in 2001. Afrasiabi has authored numerous articles in scholarly journals and newspapers, including Harvard Theological Review, Harvard International Review, UN Chronicle, London's Guardian, Bulletin of Atomic Scientists, Harvard's Belfer Center's Iran Matters, Washington Post, Boston Globe, Global Dialogue, Middle East Journal, Mediterranean Affairs, Brown's Journal of World Affairs, International Herald Tribune, Der Tageszeit, Der Tagesspiegel, Journal of International Affairs, Telos, Nation Magazine, Asia times, Global Times, Review of Politics, Eurasia Review, San Francisco Chronicle, Monthly Review, as well as scores of articles and letters in The New York Times, per the newspaper's archive. Afrasiabi has made dozens of television appearances as a Middle East expert on CNN, Aljazeera, Voice of America, PBS, BBC, PressTV, Russia Today, Canadian TV, and other networks.

Afrasiabi is fluent in several languages and has published in Farsi, English, German, French, and Spanish.

13. Dr. Afrasiabi has enjoyed a stellar reputation in the community of academics, political scientists and leaders in the field of international relations, the United Nations and world leaders.
14. On January 15, 2021, the Office of the United States Attorney for the Eastern District of New York in Brooklyn, New York charged Dr. Afrasiabi with violating the Foreign Agent Registration Act in violation of 18 U.S.C. §§ 611-618. He was arrested and appeared before a United States District Court Magistrate Judge in the United States District Court in Boston, Massachusetts as he was arrested at his residence in Massachusetts.
15. The initial complaint in Brooklyn federal court incorporated an affidavit of an F.B.I. agent detailing the United States government's allegations against Dr. Afrasiabi. The complaint was followed by an indictment and on February 10, 2021, Dr. Afrasiabi pled not guilty to the charges. Dr. Afrasiabi maintains his innocence to these charges.
16. The complaint, affidavit and indictment are public documents.
17. The two allegations against Dr. Afrasiabi are that he conspired to act as an unregistered foreign agent and acted as a foreign agent without registration in violation of 18 U.S.C. sections 612 and 618(a)(1).
18. On February 1, 2021, the defendant Struan Stevenson, acting on behalf and as an employee of the United Press International wrote an article about Dr. Afrasiabi and his pending criminal charge in the Brooklyn federal court. The headline of the article

about the plaintiff's present criminal charge read "**Iranian spy arrested by FBI was wolf in sheep's clothing**".

19. The Foreign Agents Registration Act requires persons acting as agents of foreign principals in a political or quasi-political capacity to make periodic public disclosure of their relationship with the foreign principal, as well as activities, receipts and disbursements in support of those activities. Disclosure of the required information facilitates evaluation by the U.S. government and the public of the statements and activities of such persons in light of their function as foreign agents. Political activities" means "any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party." 22 U.S.C. § 611(o). Thus, for example, a person who engages in lobbying, political activities or public relations work in the United States for a foreign principal, or advises a foreign principal regarding U.S. foreign policy or the relations between a foreign government and the United States, is required to provide a detailed registration statement to the United States Department of Justice. The filing, made under oath, must disclose the name of the foreign principal, payments made to the person by the foreign principal, and measures undertaken for the foreign principal, among other information. The purpose of FARA is to prevent covert influence in the United States by foreign principals. Proper registration under the statute allows the U.S. government and the

American people to evaluate the statements and activities of individuals who are serving as agents of foreign principals.

20. The Foreign Agent Registration Act is not a statute that covers or makes criminal espionage, or “spying”, or being a “spy”.
21. The United States government has federal statutes that penalize espionage, spying and being a spy. These statutes are contained in the United States Code at 18 U.S.C. chapter 37; §§ 792-799.
22. 18 U.S.C. § 794 is the principal espionage statute. This provision of the Federal criminal code punishes a “spy” who “with intent or reason to believe that it is to be used to the injury of the United States or to the advantage of a foreign nation, communicates, delivers, or transmits, .....to any foreign government..... any document, writing, code book, signal book, sketch, photograph, photographic negative, blueprint, plan, map, model, note, instrument, appliance, or information relating to the national defense, shall be punished by death or by imprisonment for any term of years or for life...”.
23. Dr. Afrasiabi is not charged with violating the provisions of 18 U.S.C. chapter 37; §§ 792-799 in the pending federal criminal case he now faces. He is not alleged in this pending Brooklyn federal case of being a “spy”.
24. He has never engaged in espionage against the United States.
25. The statement that Dr. Afrasiabi is an **“Iranian spy”** and was a **“wolf in sheep’s clothing”** was false, was made intentionally and with reckless disregard to the truth.
26. The damages Dr. Afrasiabi has suffered as a result of these false statements are significant.

27. In making the false statements about Dr. Afrasiabi, the defendants knew that the libelous statements about the plaintiff would be read by millions of people both in the United States and the defendants' significant international audience.
28. At the time the defendants made the false statements in the article about Dr. Afrasiabi that he was accused of being a spy, the defendants knew that this statement was false.
29. The defendants' statements that Dr. Afrasiabi was charged with being a "spy" was defamation per se because it stated that he was charged with this serious crime.
30. Dr. Afrasiabi's damages exceed \$75,000.
31. In making the libelous and defamatory statements about Dr. Afrasiabi the defendants acted with malice, oppression and/or fraud and thus the defendants are liable for punitive damages in an amount to be proved at trial.
32. Dr. Afrasiabi has suffered immeasurable and significant damage to his reputation and great emotional distress as a result of the false statements made by the defendants and with this complaint seeks compensation for this defamation and libel by the defendants.

### **DEMAND FOR RELIEF**

The plaintiff seeks the following to redress the libel and defamation the defendants have perpetrated against him:

1. Compensatory damages;
2. Punitive damages;
3. Pre-judgment interest; and
4. Other relief the Court deems appropriate.

The plaintiff demands a jury trial.

Respectfully submitted,  
**Dr. Kaveh Afrasiabi,**  
By his lawyer,

/s/ William Keefe

**William Keefe**

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April 2, 2021