

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

-----X

ERIC SPECTOR,

*Plaintiff,*

-against-

Index No.: 150234/2026

ROBERT LEFKOWITZ, JOHN DOE, AND  
JANE DOE

*Defendants.*

-----X

**MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANT LEFKOWITZ**  
**MOTION TO DISMISS**

Dated: April 29, 2026  
Westport, CT

---

Jeffery L. Ment, Esq.  
**THE MENT LAW GROUP, P.C.**  
225 Asylum Street – 15<sup>th</sup> Floor  
Hartford, CT 06103  
(860) 969-3200

**TABLE OF CONTENTS**

**I. PRELIMINARY STATEMENT** ..... 6

**II. STATEMENT OF RELEVANT FACTS** ..... 6

A. Lefkowitz Cultivated a Friendship with Plaintiff and Used Plaintiff to Generate “Viral” Content ..... 6

B. When the Friendship Deteriorated, Lefkowitz Turned Threatening, Retaliatory, and Openly Invoked “Doxxing” ..... 7

C. Lefkowitz Falsely Identified Plaintiff as “Murray Hill Guy” and Used That False Identification as the Basis for Accusations of Sexual Misconduct ..... 8

D. Lefkowitz and/or the Accounts Acting in Concert with Him Then Directed False Accusations of Rape and Sex Offenses to Plaintiff’s Employer ..... 8

**III. ARGUMENT** ..... 8

A. Legal Standard ..... 8

B. Plaintiff’s Claims Are Not Subject to New York’s Anti-SLAPP Statute ..... 9

    1. Lefkowitz’s Statements Were Not Made in the Public Interest ..... 12

    2. Plaintiff Satisfies His Burden Because Lefkowitz Acted with Actual Malice ... 12

    3. There Is a Substantial Basis in Law for Plaintiff’s Defamation and Defamation Per Se Claims ..... 17

    4. There Is a Substantial Basis in Law for Plaintiff’s Claim for Intentional Infliction of Emotional Distress ..... 20

    5. The Defamation Claims Are Meritorious ..... 22

        a. Plaintiff Has Pleaded Defamation of Character by Libel ..... 24

        b. The Statements Are Not Protected as Non-Actionable Opinion or Hyperbole ..... 24

            i. The Alleged Statements Are Not Non-Actionable Opinion ..... 28

            ii. The Alleged Statements Are Not Rhetorical Hyperbole ..... 31

        c. The Amended Complaint States a Claim for Negligence and Negligent Infliction of Emotional Distress ..... 31

        d. Plaintiff Should Not Be Ordered to Pay Lefkowitz’s Attorneys’ Fees ..... 31

**IV. CONCLUSION** ..... 32

**TABLE OF AUTHORITES****Cases:**

300 Gramatan Ave. Assoc. v. State Div. of Human Rights, 45 N.Y.2d 176 (1978)

600 W. 115th St. Corp. v. Von Gutfeld, 80 N.Y.2d 130 (1992)

Aristocrat Plastic Surgery, P.C. v. Silva, 206 A.D.3d 26, 169 N.Y.S.3d 272 (2022)

Balliet v. Kottamasu, 76 Misc. 3d 906, 175 N.Y.S.3d 678 (N.Y. Civ. Ct. 2022), aff'd sub nom. Balliet v. Kottamasu, 81 Misc. 3d 132(A), 200 N.Y.S.3d 647 (N.Y. App. Term. 2023)

Biro v. Conde Nast, 883 F. Supp. 2d 441 (S.D.N.Y. 2012)

Brian v. Richardson, 87 N.Y.2d 46 (1995)

Celle v. Filipino Reporter Enters., 209 F.3d 163 (2d Cir. 2000)

Chau v. Lewis, 771 F.3d 118 (2d Cir. 2014)

Cohen v. Broad Green Pictures, LLC, 59 Misc. 3d 1205(A) (Sup. Ct. N.Y. Cnty. Oct. 19, 2017), aff'd, 160 A.D.3d 569 (1st Dep't 2018)

Davis v. Boenheim, 24 N.Y.3d 262 (2014)

Dillon v. City of New York, 261 A.D.2d 34 (1st Dep't 1999)

Donnell v. Daily News L.P., 76 Misc. 3d 1210(A) (Sup. Ct. N.Y. Cnty. Aug. 19, 2022)

Duncan v. Dick Blick Holdings, Inc., 88 Misc. 3d 1212(A), 2026 N.Y. Slip Op. 50082(U) (2026)

Eros Intl. PLC v. Mangrove Partners, 2019 N.Y. Slip Op. 30604(U), aff'd, 191 A.D.3d 465 (1st Dep't 2021)

Finkel v. Dauber, 29 Misc. 3d 325 (Sup. Ct. Nassau Cnty. 2010)

Flamm v. American Ass'n of University Women, 201 F.3d 144 (2d Cir. 2000)

Franklin v. Daily Holdings, Inc., 135 A.D.3d 87 (1st Dep't 2015)

Foster v. Churchill, 87 N.Y.2d 744 (1996)

Friedman v. Bloomberg L.P., 884 F.3d 83 (2d Cir. 2017)

Goldman v. Reddington, 417 F. Supp. 3d 163 (E.D.N.Y. 2019)

Gottwald v. Sebert, 193 A.D.3d 573 (1st Dep't 2021)

Great Wall Med. P.C. v. Levine, 74 Misc. 3d 1224(A), 163 N.Y.S.3d 783 (Sup. Ct. 2022)

Haart v. Scaglia, 78 Misc. 3d 1238(A), 187 N.Y.S.3d 923 (Sup. Ct. 2023)

Harris v. Hirsch, 228 A.D.2d 206 (1st Dep't 1996)

Kamdem-Ouaffo v. Balchem Corp., No. 17-CV-2810 (KMK), 2018 WL 4386092 (S.D.N.Y. Sept. 14, 2018)

Karedes v. Ackerley Grp., Inc., 423 F.3d 107 (2d Cir. 2005)

Lax v. City Univ. of New York, 80 Misc. 3d 1212(A) (Sup. Ct. 2023)

Liberman v. Gelstein, 80 N.Y.2d 429 (1992)

Matter of Ridge Rd. Fire Dist. v. Schiano, 16 N.Y.3d 494 (2011)

Miller v. Appadurai, 214 A.D.3d 455 (1st Dep't 2023), appeal denied, 40 N.Y.3d 902 (2023)

Nolan v. State, 158 A.D.3d 186 (1st Dep't 2018)

Palin v. New York Times Co., 940 F.3d 804 (2d Cir. 2019)

Prozeralik v. Capital Cities Communications, 82 N.Y.2d 466 (1993)

Reeves v. Associated Newspapers, Ltd., 232 A.D.3d 8 (1st Dep't 2024), appeal dismissed, 2025 N.Y. LEXIS 1138 (2025)

Rinaldi v. Holt, Rinehart & Winston, 42 N.Y.2d 369 (1977)

Sandals Resorts Intl. Ltd. v. Google, Inc., 86 A.D.3d 32 (1st Dep't 2011)

Schoepflin v. Coffey, 162 N.Y. 12 (1900)

Shah v. Mitra, 171 A.D.3d 971 (2d Dep't 2019)

Silvercorp Metals Inc. v. Anthion Mgt. LLC, 36 Misc. 3d 1231(A) (Sup. Ct. N.Y. Cnty. 2012)

St. Amant v. Thompson, 390 U.S. 727 (1968)

Steinhilber v. Alphonse, 68 N.Y.2d 283 (1986)

Thomas H. v. Paul B., 18 N.Y.3d 580 (2012)

Thorsen v. Sons of Nor., Inc., 996 F. Supp. 2d 143 (E.D.N.Y. 2014)

Trump v. Trump, 79 Misc. 3d 866 (Sup. Ct. 2023)

V. Groppa Pools, Inc. v. Massello, 106 A.D.3d 722, 964 N.Y.S.2d 563 (2013)

VIP Pet Grooming Studio, Inc. v. Sproule, 224 A.D.3d 78, 203 N.Y.S.3d 681 (2024)

Vitagliano v. Weiner, 237 A.D.3d 1548 (2025)

Watson v. NY Doe 1, 439 F. Supp. 3d 152 (S.D.N.Y. 2020)

Zuckerbrot v. Lande, 75 Misc. 3d 269 (Sup. Ct. N.Y. Cnty. 2022)

**Statutes and Rules:**

N.Y. C.P.L.R. § 3016(a)

N.Y. C.P.L.R. § 3211(a)(7)

N.Y. C.P.L.R. § 3211(g)

N.Y. Civil Rights Law § 70-a(1)(a)

N.Y. Civil Rights Law §§ 70-a and 76-a

N.Y. Civil Rights Law § 76-a(1)

N.Y. Civil Rights Law § 76-a(1)(a)

N.Y. Civil Rights Law § 76-a(2)

## I. PRELIMINARY STATEMENT

Lefkowitz’s motion is an effort to distract and mislead the Court with inflammatory, prejudicial, and decontextualized X posts in the hope that the Court will simply conclude that Spector is, in fact, the kind of person Lefkowitz falsely portrayed him to be. In other words, Lefkowitz seeks to convert this motion from a test of the sufficiency of the pleading into an invitation to decide that Spector somehow “deserved” to be doxxed, branded a rapist and sex offender, and professionally ruined. That is not a legal defense, and it is not a basis for dismissal.

## II. STATEMENT OF RELEVANT FACTS<sup>1</sup>

Plaintiff and Lefkowitz developed a friendship in late 2024 and early 2025 and communicated extensively about social media, posting, virality, account growth, and anonymous online personas. Am. Compl. ¶¶ 11–21. Their communications reflected a private project centered on provocation, follower growth, and testing offensive content for virality. *Id.* Lefkowitz encouraged Plaintiff to post inflammatory material so that Lefkowitz could test such content through Plaintiff, shield himself from direct exposure, and preserve leverage over Plaintiff. *Id.* ¶¶ 13–21.

Plaintiff further alleges that Lefkowitz was associated with, and in some capacity at least one administrator, contributor, ghostwriter, and/or controlling participant in, the X account known as “Murray Hill Guy.” *Id.* ¶ 14. During this period, Plaintiff and Lefkowitz pursued virality through various X accounts, including “Marvin” / “@goonboss\_,” which Lefkowitz knew about and used, at least in part, to promote their online content.

---

<sup>1</sup> For a detailed recitation of the facts, please see Plaintiff Amended Complaint, (NYSCEF No. 39).

By the summer of 2025, Plaintiff began distancing himself from Lefkowitz's erratic and controlling behavior, and Lefkowitz became resentful and hostile. On May 17, 2025, Lefkowitz texted Plaintiff: "I'll tell JE to doxx you." *Id.* ¶ 30. On September 9, 2025, he texted Plaintiff: "you ignore your friends," "you aren't safe!!," and "it's about to get worse pal." *Id.* ¶ 31. On September 12, 2025, he escalated further, telling Plaintiff: "you are also an enemy and will face a dox going forward I will take you down and everything you stand for!! No one does me wrong. No one." *Id.* ¶ 32

On August 27, 2025, Lefkowitz texted Plaintiff, "kicking you and doxxing you in that chat," and separately, "Sending a picture of you in like an hour when I'm home from park." *Id.* ¶¶ 53–54. On September 12, 2025, a screenshot reflected a demand to "Bro dox him" and a threat to call Plaintiff's job if Plaintiff did not respond. *Id.* ¶ 55. On September 13, 2025, after calling Plaintiff an "enemy" the day before, Lefkowitz sent Plaintiff a screenshot of a post falsely stating that "Eric Spector runs the Murray Hill Guy account," that he was a "confirmed creep," and that he had "charges" from several females, followed by the message: "Good luck. I'm not helping." *Id.* ¶ 56.

Beginning in or about May or June 2025, Lefkowitz began asserting that Plaintiff was "the person" behind the "Murray Hill Guy" account. *Id.* ¶¶ 35-37. Those assertions were false. In fact, Plaintiff did not operate the account in the manner Lefkowitz publicly claimed, nor was Plaintiff responsible for the conduct and statements that Lefkowitz and others began attributing to him through that false identification. The pleading does not stop at conclusory allegations. Rather, it alleges that Lefkowitz either directly made, materially contributed to, furnished content for, encouraged, or knowingly ratified the false "Murray Hill Guy" identification. *Id.* ¶ 38.

On May 1, 2025, Auquan AI publicly announced Plaintiff’s employment on X. *Id.* ¶ 45. In reply, the account “rory g” / @gilgilmars—*alleged to be operated by Lefkowitz*—posted, “Eric Spector: confirmed sex offender.” *Id.* ¶ 46. The account “Chucky” / @Chucky365787—*also alleged to be operated by Lefkowitz*—then replied directly beneath Auquan AI’s hiring announcement: “RaPist.” *Id.* ¶ 47. That same account then further posted that “Eric Spector runs the Murray Hill Guy account” and “he’s a confirmed creep and has r— charges on him by several females,” while tagging Plaintiff’s employer and related accounts. *Id.* ¶ 48.

### III. ARGUMENT

#### A. LEGAL STANDARD

A party can move to dismiss a claim for failing to state a cause of action, pursuant to N.Y. C.P.L.R. § 3211(a)(7). The Court must give the party pleading the claim “liberal construction...accept[ing] as true all facts as alleged in the pleading, accord[ing] the pleader the benefit of every possible inference and determine only whether the facts as alleged fit within any cognizable legal theory.” *V. Groppa Pools, Inc. v. Massello*, 106 A.D.3d 722, 722–23, 964 N.Y.S.2d 563, 564–65 (2013); *Shah v. Mitra*, 171 A.D.3d 971, 973 (2d Dep’t 2019). N.Y.

New York’s anti-SLAPP statute, governed by N.Y. C.P.L.R. § 3211(g), was intended “‘to protect citizens who participate in public affairs,’ namely, those relating to applications requiring government approval, against retaliatory lawsuits.” *VIP Pet Grooming Studio, Inc. v. Sproule*, 224 A.D.3d 78, 82, 203 N.Y.S.3d 681, 685 (2024). In 2020, New York’s legislature broadened the scope of the anti-SLAPP statute to “any communication in a place open to the public or a public forum in connection with an issue of public interest.” N.Y. Civil Rights L. § 76-a (1); *Aristocrat Plastic Surgery, P.C. v. Silva*, 206 A.D.3d 26, 28–29, 169 N.Y.S.3d 272, 274 (2022). In effect, this expanded the pool of potential individuals that may raise anti-SLAPP defenses

expanded to alleged “survivors of sexual abuse.” *VIP Pet Grooming Studio, Inc.*, 224 A.D.3d at 686.

For motions that are made claiming protection under the Anti-SLAPP laws, the moving party must first demonstrate “that the claim subject to the motion qualifies as an action involving public petition and participation.” *VIP Pet Grooming Studio, Inc.*, 224 A.D.3d at 685. The burden then shifts to the party who asserted the claim, to show “that any communication which gives rise to the action was made with knowledge of its falsity or with reckless disregard of whether it was false.” *Great Wall Med. P.C. v. Levine*, 74 Misc. 3d 1224(A), 163 N.Y.S.3d 783 (N.Y. Sup. Ct. 2022); N.Y. Civil Rights L. § 76-a (2). Or, in other words, plaintiff must demonstrate “that the communication was made with “actual malice” — that is, with knowledge that it was false or with reckless disregard of whether it was false or not.” *Great Wall Med. P.C.*, 163 N.Y.S.3d at 783, quoting *Prozeralik v. Capital Cities Communications*, 82 NY2d 466, 474 (1993). As previously indicated, the non-moving party must also establish that the claim “has a substantial basis in law or is supported by a substantial argument for an extension, modification, or reversal of existing law.” N.Y. C.P.L.R. § 3211(g); *VIP Pet Grooming Studio, Inc.*, 203 N.Y.S.3d 685-686.

Although actual malice is subjective, a court will typically infer actual malice from objective facts.” *Balliet v. with prejudice of the other Kottamasu*, 76 Misc. 3d 906, 915, 175 N.Y.S.3d 678, 685 (N.Y. Civ. Ct. 2022), *aff’d sub nom. Balliet v. Kottamasu*, 81 Misc. 3d 132(A), 200 N.Y.S.3d 647 (N.Y. App. Term. 2023). Courts turn to “evidence of negligence, motive and intent such that an accumulation of the evidence and appropriate inferences supports the existence of actual malice.” *Id.* at 685.

**a. The Plaintiff’s Claims Are Not Subject to New York’s Anti-SLAPP Statute.**

**a. Lefkowitz’s Statements Were Not Made in the Public Interest.**

New York Civil Rights Law §§70-a and 76-a are collectively known as the “Anti-SLAPP statute”. “SLAPP suits—or strategic lawsuits against public participation—are chartered as having little legal merit but filed nonetheless to burden opponents with legal defense costs and the threat of liability and to discourage those who might wish to speak out in the future.” *Trump v. Trump*, 79 Misc. 3d 866, 872 (Sup Ct. 2023), citing *600 W. 115th St. Corp. v. Von Gutfeld*, 80 N.Y. 2d 130, 137 (1992). “It is well established that the anti-SLAPP legislation was enacted to deter litigants from attempting to silence free speech.” *Lax v. City Univ. of New York*, 80 Misc. 3d 1212(A) (Sup Ct. 2023).

While the legislature enlarged the statute’s scope in 2020, it did not intend a wholesale change of New York law. To the contrary, one of the sponsors of the legislation in the Assembly explained, “for many years [she] fought numerous efforts made to ‘bar the courthouse door’ or otherwise chill or make it more difficult for New York citizens to seek judicial intervention,” and defended sponsoring the amendments by stating “this bill, however, deals with a very tiny but growing subclass of civil litigation, where lawsuits are not brought to win on the merits, but are brought to harass, injure, and deter free speech and expression by the defendant and others.” *See* 2020 Bill Jacket, attached here to as Exhibit A. Even with the amendments, “free access to the courts must remain sacrosanct.” *Id.*

The series of posts in this case was not “other lawful conduct in furtherance of the exercise of the constitutional right to free speech.” *See* Civil Rights Law §76-a(1)(a)(2). Lefkowitz’ argument fails because the libelous statements made on X do not relate to a matter of public interest. Plaintiff brings his claims not to chill Lefkowitz’ desire to become a viral sensation on social media, but to clear Plaintiff’s name of wrongdoing and recover damages from Lefkowitz’s wrongful statements on X labeling Plaintiff as a sexual predator. “Publication is not

of public concern if the text relates to gossip or subject of prurient interest or is directed to a limited private audience.” *Cohen v. Broad Green Pictures, LLC*, 59 Misc. 3d 1205 (A) (Sup. Ct. NY Oct 19, 2017) (aff’d, 160 A.D. 3d 569 (1st Dept. 2018)); *Miller v. Appadurai*, 214 A.D. 3d 455, 456 (1st Dept. 2023) (“Although the Letter touched on topics of public interest, those topics were not its focus...under these circumstances, its content was not within the sphere of public interest” *appeal denied*, 40 NY 3d 902 (2023)). While Plaintiff recognizes that courts have, in certain circumstances, treated allegations of sexual misconduct as touching on matters of public interest, that principle does not insulate Lefkowitz’s conduct here. This was not a good-faith effort to warn the public, contribute to a legitimate public debate, or engage in protected commentary. Rather, as the Amended Complaint and associated Exhibit “A” attached thereto alleges, Lefkowitz and Plaintiff were engaged in a private friendship and collaborative online relationship centered on the creation of provocative “viral” content. When that relationship deteriorated, Lefkowitz turned vindictive. He threatened Plaintiff, called him an “enemy,” threatened to dox him, admitted “I sent your name,” boasted about “kicking you and doxxing you in that chat,” and then either directly made or acted in concert with others to accuse Plaintiff of being a “confirmed sex offender,” a “RaPist,” and a “confirmed creep” with sexual “charges,” including directly beneath Plaintiff’s employer’s hiring announcement. That was not public participation by any stretch of the meaning. Whatever Plaintiff may have posted on his separate Marvin / @goonboss\_ account, which, by all accounts, was done in concert with Lefkowitz, it did not transform Lefkowitz’s false, employer-directed accusations calling Plaintiff a sexual predator into speech on “a matter of public interest.” At most, Lefkowitz sought to exploit Plaintiff’s online persona as a pretext to stir gossip, inflame prurient curiosity, and destroy

Plaintiff's reputation and livelihood. The anti-SLAPP statute was not enacted to protect that kind of vindictive conduct.

**b. Plaintiff Satisfies His Burden Because Lefkowitz Acted With Actual Malice.**

Notwithstanding the foregoing, should the court find that Lefkowitz has met his burden by providing that the statements were provided in a public forum and in connection with an issue of public interest, the burden then shifts to the plaintiff to demonstrate “that the communication was made with “actual malice”—that is, with knowledge that it was false or with reckless disregard of whether it was false or not.” *Great Wall Med. P.C.*, 163 N.Y.S.3d at 783, quoting *Prozeralik*, 82 N.Y.2d at 474.<sup>2</sup>

The existence of facts that demonstrate negligence, motive, and intent, when taken in totality, and with the appropriate inferences, support the presence of actual malice. *Balliet*, 175 N.Y.S. 3d at 685. “The Second Circuit has stated that “[e]vidence of ill will combined with other circumstantial evidence indicating that the defendant acted with reckless disregard of the truth or falsity of a defamatory statement may also support a finding of actual malice.” *Id.* Relevant to a

---

<sup>2</sup> Lefkowitz incorrectly suggests that Plaintiff must establish his claims by “clear and convincing evidence” at this stage. *See* Lefkowitz Mem. of Law. At p. 15 (NYSCEF Doc. No. 12). That is not the standard under CPLR 3211(g). As the Court of Appeals has explained, the “substantial basis” standard in CPLR 3211(g) is distinct from the “clear and convincing evidence” standard set forth in Civil Rights Law § 76-a(2). *See Vitagliano v. Weiner*, 237 A.D. 3d 1548 (2025). Rather, the Legislature intended CPLR 3211(g)’s “substantial basis” requirement to import the substantial-evidence standard, i.e., “such relevant proof as a reasonable mind may accept as adequate to support a conclusion or ultimate fact.” *Id.* That standard is “less than a preponderance of the evidence, overwhelming evidence or evidence beyond a reasonable doubt,” and “demands only that a given inference is reasonable and plausible, not necessarily the most probable.” *Id.* *See also Reeves v. Associated Newspapers, Ltd.*, 232 A.D.3d 8, 20–23 (1st Dep’t 2024), appeal dismissed, 2025 N.Y. LEXIS 1138 (2025); *Matter of Ridge Rd. Fire Dist. v. Schiano*, 16 N.Y.3d 494, 499 (2011); 300 *Gramatan Ave. Assoc. v. State Div. of Human Rights*, 45 N.Y.2d 176, 180 (1978).

showing that a defendant acted with actual malice is whether there are obvious reasons to doubt the veracity of the informant or the accuracy of the reports. *Zuckerbrot v. Lande*, 75 Misc. 3d 269, 296 (New York Cty. 2022) (citing *St. Amant v. Thompson*, 390 U.S. 727, 731 (1968)). Actual malice may be established through circumstantial evidence, including the defendant's own actions or the dubious nature of her sources. *Id.*

Here, Lefkowitz acted with actual malice in making and/or causing the statements at issue.

First, as evidenced in the text message exchanges between Lefkowitz and Plaintiff, they had a private, and increasingly toxic, personal relationship that went sour. Thus, Plaintiff and Lefkowitz were not strangers engaged in some abstract public controversy and knew nothing about each other. They were participants in a private friendship and collaborative online relationship centered on the creation of provocative “viral” content. Lefkowitz cultivated that relationship and used Plaintiff to post inflammatory and/or offensive content online so that Lefkowitz could test such material through Plaintiff, shield himself from direct exposure, and obtain leverage over Plaintiff. *Id.* When Plaintiff later distanced himself, Lefkowitz became resentful, jealous, and openly hostile. *Id.* ¶¶ 25–29. By way of example and not limitation, Lefkowitz told Plaintiff: “I’ll tell JE to doxx you,” later warned Plaintiff that he was “an enemy” who would “face a dox going forward,” and further stated, among other things, “you aren’t safe!!” and “it’s about to get worse pal.” *Id.* ¶¶ 30–32. These are not the words of a good-faith speaker trying to participate in a public debate; they are the words of a spiteful and vindictive actor threatening retaliation.

Lefkowitz's own actions during the relevant period demonstrate a deliberate effort to expose Plaintiff and ruin him, not to communicate truthfully. Plaintiff alleges that Lefkowitz

admitted “I sent your name,” boasted about “kicking you and doxxing you in that chat,” threatened to circulate Plaintiff’s photograph, and later sent Plaintiff a screenshot of a post accusing him of being a “confirmed creep” with sexual “charges,” followed by the taunting message, “Good luck. I’m not helping.” Am. Compl. ¶¶ 52–57. Plaintiff further alleges that Lefkowitz either directly published, or acted in concert with other pseudonymous accounts mentioned herein and in the Amended Complaint, to publish, false accusations that Plaintiff was a “confirmed sex offender” and a “RaPist” directly beneath Plaintiff’s employer’s hiring announcement. *Id.* ¶¶ 45–51. Taken together, those facts demonstrate not negligence or some kind of good faith basis to say the things he did about the Plaintiff, but a purposeful campaign to weaponize false accusations of sexual misconduct in order to inflict personal and professional harm—irrespective of the truth or falsity of the statements.

Moreover, the Amended Complaint sets forth facts that directly call Lefkowitz’s claimed belief in the truth of the statements into question. Lefkowitz’s communications reflect actual knowledge of and participation in the “Murray Hill Guy” persona, including references to “Murray Hill Guy’s Twitter Goals,” content strategy, “ghostwriting” in a chat group identified as “MHG ghost writers.” Am. Compl. ¶ 41. At the same time, those same communications demonstrate that Lefkowitz understood Plaintiff to maintain and develop a separate online persona apart from “Murray Hill Guy,” including references to “Marvin” / “@goonboss\_,” whether Plaintiff should “*make a Marvin*,” restart or remake accounts, obtain a blue check, and “go viral under [his] real name.” *Id.* ¶ 42. Thus, Lefkowitz was not some outsider repeating rumor or misunderstanding online events.

Lefkowitz’s post-publication conduct likewise supports actual malice. Even after Plaintiff’s employer began reacting to the accusations, Lefkowitz did not retreat, correct the

record, or distance himself from the smear campaign. Instead, when Plaintiff advised that “HR had me go in,” Lefkowitz asked whether they had “act all weird,” Am. Compl. ¶ 70. It’s incredulous to submit to the court a myriad of prejudicial “tweets” from the Marvin account, but nothing between the parties that would lend even the slightest credence that Lefkowitz actually believed the Plaintiff to be a sexual predator.

After Lefkowitz got the Plaintiff terminated from his job, Lefkowitz continued to taunt him by sending a text saying: “Hey pal, I got Knuckles. I have all the proof I need. Let me know when your investigation is done and want to be my friend again. He’s done though. He will never bother us again.” *Amended Complaint*. ¶ 72. Accordingly, the Amended Complaint alleges a coherent and highly plausible narrative of private retaliation, doxxing, false criminal accusations, and employer-directed defamation. Those allegations, accepted as true and viewed in the light most favorable to Plaintiff, more than suffice to defeat Lefkowitz’s motion and permit this action to proceed.

Lefkowitz’s reliance on anti-SLAPP case law addressing matters of public interest is misplaced. Plaintiff does not dispute that X is a public-facing platform. But that is only half of the inquiry. The question is whether the challenged communications were made *in connection with an issue of public interest*, as opposed to being part of a private retaliatory campaign carried out on a public platform. For example, Lefkowitz relies heavily on *Coleman v. Grand*, 523 F. Supp. 3d 244 (E.D.N.Y. 2021), *aff’d*, 158 F.4th 132 (2d Cir. 2025) for the proposition that allegations of sexual impropriety may constitute matters of public concern. *See* Lefkowitz Mem. of Law at p. 9. Even accepting that proposition in the abstract, *Coleman* does not control here because the Amended Complaint alleges that the challenged speech was not a good-faith warning, public commentary, or participation in a broader social discussion. Instead, it was a

private revenge campaign. Plaintiff alleges that Lefkowitz cultivated him, used him to test “viral” content, then, when the relationship deteriorated, threatened to dox him, disseminated his identifying information, and either directly made or acted in concert with others to accuse Plaintiff of being a “confirmed sex offender” and a “RaPist” directly beneath Plaintiff’s employer’s hiring announcement.

Lefkowitz also cites *Lewis v. Newsday, Inc.*, 246 A.D.2d 434, 668 N.Y.S.2d 134 (1st Dep’t 1998) for the proposition that even “human interest” items may be matters warranting public exposition. But *Lewis* involved media coverage and the outer boundaries of public concern in a very different context. It does not stand for the proposition that false sexual accusations hurled at a private individual by a former friend or associate, and posted directly to that person’s employer, become protected as a “human interest” item. If anything, the allegations here are much closer to the sort of “gossip and prurient interest” that courts have recognized fall outside legitimate public concern.

Lefkowitz’s reliance on *Zeitlin v. Cohan*, No. 156829/2021, 2022 WL 3647126 (Sup. Ct. N.Y. Cnty. Aug. 24, 2022) is similarly unavailing. *Zeitlin* involved a markedly different factual setting and a materially different public-interest context. Here, Plaintiff was not a public official, celebrity executive, or figure who had injected himself into any public controversy concerning sexual misconduct. Rather, he was a private individual whose employer publicly announced his hiring, after which Lefkowitz and/or affiliated accounts posted that he was a “confirmed sex offender,” a “RaPist,” and a “confirmed creep” with sexual “charges.” The pleaded facts show not public watchdog activity, but personal animus, doxxing threats, and an effort to destroy Plaintiff’s livelihood. That is a far cry from the kind of public-interest reporting or discourse contemplated by *Zeitlin*.

Lefkowitz's cited authorities, even taken at face value, do not answer the real question presented here: whether the speech alleged in the Amended Complaint was genuinely connected to a matter of public interest, or whether it was instead part of a private retaliatory campaign. The Amended Complaint answers that question clearly.

**c. There is a Substantial Basis in the Law for Plaintiff's Defamation and Defamation Per Se Claims.**

To the extent that the Court finds that the Anti-SLAPP statute does apply, there is a substantial basis in law for Plaintiff's claims against Lefkowitz. N.Y. C.P.L.R. § 3211(g).

"To establish a claim for defamation under New York law, a plaintiff must prove that: (1) the defendant published a defamatory statement of fact to a third party, (2) the statement of fact was false, (3) the false statement of fact was made with the applicable level of fault, and (4) either the false statement was defamatory per se or caused the plaintiff special harm." *Kamdem-Ouaffo v. Balchem Corp.*, No. 17-CV-2810 (KMK), 2018 WL 4386092, at \*19 (S.D.N.Y. Sept. 14, 2018) (internal citations and quotations omitted)." Under New York law, a plaintiff must establish the following elements to recover a claim for libel: (i) a written defamatory statement of fact concerning the plaintiff; (ii) publication to a third party; (iii) fault (either negligence or actual malice); (iv) falsity of the defamatory statement; and (v) special damages or per se actionability. *Friedman v. Bloomberg L.P.*, 884 F.3d 83, 95 (2d Cir. 2017). Libel includes defamatory statements that are published online. *Id.* at 89, 95. As this Court set forth in *Donnell v. Daily News L.P.*, 76 Misc. 3d 1210(A), at \*4 (Aug. 19, 2022):

Libel is a form of defamation that concerns an injury to an individual's reputation from statements made in a written publication that are presented as facts rather than as opinion.... The essence of a libel claim is that the written statement is false and defamatory.... A false statement is defamatory only if it exposed the plaintiff "to public

contempt, ridicule, aversion, or disgrace, or an evil opinion” of him that deprives him of “friendly intercourse in society.... Some statements, such as alleging that a person engaged in serious crimes, are of such an inflammatory nature that they are considered per se libelous and do not require the plaintiff to plead and prove special damages.

Sexual assault and rape accusations do not fall within the realm of protected opinion.

*Gottwald v. Sebert*, 193 A.D.3d 573, 581 (1st Dep’t 2021) (statements that plaintiff raped and abused defendant were not protected opinion). A statement which falsely accuses a person of rape or sexual assault is defamatory per se. *Id.* See also *Watson v. NY Doe 1*, 439 F. Supp. 3d 152, 163 (S.D.N.Y. 2020) *Goldman v. Reddington*, 417 F. Supp. 3d 163, 173 (E.D.N.Y. 2019). Such as in the case here, as the statements made by Lefkowitz, and annexed in the Amended Complaint’s Exhibit “A”, clearly show.

Plaintiff’s alleges that Lefkowitz and/or accounts acting in concert with him published written accusations that Plaintiff was a “confirmed sex offender,” a “RaPist,” and a “confirmed creep” with sexual “charges,” including directly beneath Plaintiff’s employer’s hiring announcement. Am. Compl. ¶¶ 45–51. The Amended Complaint further alleges that Lefkowitz falsely identified Plaintiff as the person behind “Murray Hill Guy” and used that false identification as the basis for attributing predatory conduct and sexual wrongdoing to him. Am. Compl. ¶¶ 35–44, 50–51.

The falsity element is likewise sufficiently established. Plaintiff alleges that he did not operate the “Murray Hill Guy” account in the manner Lefkowitz publicly claimed and was not responsible for the statements and misconduct later attributed to him. Am. Compl. ¶¶ 36–37. Plaintiff also alleges that the accusations of rape, sex offenses, and sexual predation were categorically false. Am. Compl. ¶¶ 49, 75–77. Moreover, the Amended Complaint pleads facts supporting why Lefkowitz either knew, or recklessly disregarded, that those accusations were

false: Lefkowitz had insider knowledge of the “Murray Hill Guy” ecosystem, while simultaneously understanding that Plaintiff maintained a separate online persona, “Marvin” / “@goonboss\_.” Am. Compl. ¶¶ 41–44. Those allegations alone provide a substantial basis for the falsity and fault elements.

Publication to third parties is not merely pleaded; it is specifically detailed. Plaintiff alleges that the statements were posted on X, including directly beneath Auquan AI’s public hiring announcement welcoming Plaintiff, and that one of the posts tagged Plaintiff’s employer and related accounts. Am. Compl. ¶¶ 45–48. Plaintiff further alleges that the accusations reached his employer, triggered HR scrutiny, and contributed directly to his termination. Am. Compl. ¶¶ 67–77. That is more than sufficient at this stage.

The applicable level of fault is also adequately pleaded. See A(a)(ii), *infra*.

Finally, the Amended Complaint adequately alleges both per se defamation and actual damages. Accusations of rape, sex offenses, and comparable criminal sexual misconduct are defamatory per se under New York law. *Gottwald*, 193 A.D.3d at 581. In addition, Plaintiff alleges substantial concrete harm, including reputational injury, humiliation, emotional distress, HR scrutiny, and termination from his employment. Am. Compl. ¶¶ 67–78. Thus, whether analyzed as defamation per se or as defamation causing special harm, Plaintiff’s claims possess a substantial basis in law.

This is not a case where Plaintiff relies on vague conclusions or abstract characterizations. The Amended Complaint identifies the statements, their falsity, the accounts from which they were published, the audience to whom they were directed, the basis for

Lefkowitz's fault, and the resulting harm. That is more than sufficient to defeat dismissal, even under CPLR 3211(g).

**d. There is a Substantial Basis in Law for Plaintiff's Claim for Intentional Infliction of Emotional Distress.**

Under New York law, a claim for Intentional Infliction of Emotional Distress ("IIED") requires a showing of: (i) extreme and outrageous conduct; (ii) intent to cause, or disregard of a substantial probability of causing, severe emotional distress; (iii) causal connection between the conduct and injury; and (iv) severe emotional distress. *Rich v. Fox News Network*, 939 F.3d 112, 122 (2d Cir. 2019). The element most susceptible to determination as a matter of law is whether the defendant engaged in extreme and outrageous conduct. *Id.*

"One who by extreme and outrageous conduct intentionally or recklessly causes severe emotional distress to another is subject to liability for such emotional distress." *Id.* Extreme and outrageous conduct will be found where a defendant engages in conduct that amounts to a deliberate and malicious campaign of harassment or knew of the plaintiff's susceptibility to emotional distress and chose to proceed with their plan in spite of that knowledge. *Id.*

Here, Plaintiff alleges far more than isolated insults or mean name-calling. It alleges a sustained retaliatory campaign by Lefkowitz directed at Plaintiff personally and professionally. Plaintiff alleges that when the relationship between the parties deteriorated, Lefkowitz called Plaintiff an "enemy," threatened that Plaintiff would "face a dox," told Plaintiff "you aren't safe!," stated "it's about to get worse pal," threatened to post Plaintiff and circulate his photograph, admitted "I sent your name," and boasted about "kicking you and doxxing you in that chat." Am. Compl. ¶¶ 25–34, 52–57. Plaintiff further alleges that Lefkowitz either directly

made, or acted in concert with others to make, false accusations that Plaintiff was a “confirmed sex offender,” a “RaPist,” and a “confirmed creep” with sexual “charges,” including directly beneath Plaintiff’s employer’s hiring announcement. *Id.* ¶¶ 45–51. After doing so, Lefkowitz allegedly sent Plaintiff the defamatory material together with the taunting message: “Good luck. I’m not helping.” *Id.* ¶ 56. That course of conduct, if proven, is more than sufficient to support the finding of extreme and outrageous behavior.

Nor is this claim merely duplicative of Plaintiff’s defamation claims. Plaintiff’s IIED claim is based not simply on the publication of false statements, but on the broader campaign of threats, doxxing, intimidation, exposure of Plaintiff’s identity, threats to circulate Plaintiff’s photograph, employer-directed sabotage, and taunting communications sent directly to Plaintiff while the campaign was unfolding. Am. Compl. ¶¶ 30–34, 52–60, 67–77.

The Amended Complaint also adequately pleads intent, or at minimum reckless disregard of a substantial probability of causing severe emotional distress. Plaintiff alleges that Lefkowitz acted vindictively after the relationship between the parties deteriorated, threatened to “take [Plaintiff] down,” disclosed or threatened to disclose Plaintiff’s identity, and continued even after Plaintiff’s employer became involved and Plaintiff’s job was in jeopardy. *Id.* ¶¶ 25–34, 52–57, 69–73. Those allegations readily support the inference that Lefkowitz intended to cause Plaintiff severe distress or, at the very least, consciously disregarded the near certainty that such distress would follow.

Finally, the Amended Complaint pleads causation and severe emotional distress. Plaintiff alleges that as a result of Lefkowitz’s conduct, he suffered humiliation, fear, loss of personal security, anxiety, emotional distress, damage to personal and professional relationships, HR

scrutiny, and the loss of his employment. *Id.* ¶¶ 67–78. At this stage, those allegations are more than sufficient to establish a substantial basis in law for the IIED claim.

**e. The Defamation Claims Are Meritorious**

**1. Plaintiff Has Plead Defamation of Character By Libel.**

The four established categories of defamation *per se* are where the statement(s) (1) charge plaintiff with a serious crime; (2) injure another in his or her trade, business, or profession; (3) allege a loathsome disease; or (4) impute unchastity to a woman. *Lieberman v. Gelstein*, 80 NY2d 429, 435 (1992). A claim of defamation *per se* is subject to the pleading standard set forth in CPLR § 3016 (a), which requires that the particular words complained of shall be set forth in the complaint, but their application to the plaintiff may be stated generally.

These standards are easily satisfied here. Plaintiff alleges that Lefkowitz and/or accounts acting in concert with him published written statements falsely accusing Plaintiff of being a “confirmed sex offender,” a “RaPist,” a “confirmed creep” with sexual “charges,” and the person behind “Murray Hill Guy.” Those statements were not abstract insults. They were published directly beneath Plaintiff’s employer’s hiring announcement and in related online posts that identified Plaintiff by name and tied him to criminal sexual misconduct. Am. Compl. ¶¶ 45–48, 51. Those allegations satisfy the first element: a false statement concerning Plaintiff. Plaintiff expressly alleges that those accusations were false, that he was not “Murray Hill Guy” in the manner claimed, and that he was not a rapist, sex offender, or sexual predator. Am. Compl. ¶¶ 36–37, 49, 75–77, 81. The second element—publication to a third party—is likewise plainly alleged. The posts were published on X, including directly beneath Auquan AI’s public hiring announcement welcoming Plaintiff as a new employee. Am. Compl. ¶¶ 45–48, 67–68.

The Amended Complaint also adequately pleads fault. At a minimum, Plaintiff alleges negligence. But the pleading goes much further: it alleges actual malice. Plaintiff pleads that Lefkowitz had insider knowledge of the “Murray Hill Guy” ecosystem while simultaneously knowing that Plaintiff maintained a separate online persona, “Marvin” / “@goonboss\_,” thereby giving Lefkowitz obvious reason to know—or, at minimum, recklessly disregard—that the public identification of Plaintiff as “Murray Hill Guy” was false. Am. Compl. ¶¶ 41–44. Plaintiff further alleges motive, animus, and retaliatory conduct, including that Lefkowitz called Plaintiff an “enemy,” threatened that Plaintiff would “face a dox,” admitted “I sent your name,” boasted about “kicking you and doxxing you in that chat,” threatened to circulate Plaintiff’s photograph, and then sent Plaintiff a defamatory post with the taunting message, “Good luck. I’m not helping.” Am. Compl. ¶¶ 30–34, 52–57.

The Amended Complaint also pleads defamation per se. Under New York law, the established categories of defamation per se include statements that charge the plaintiff with a serious crime and statements that injure the plaintiff in his trade, business, or profession. Plaintiff pleads both.

First, the challenged statements charge Plaintiff with serious crimes. Calling Plaintiff a “confirmed sex offender” and a “RaPist” is an express accusation of criminal sexual misconduct. Likewise, stating that Plaintiff had sexual “charges” from several females communicates that Plaintiff committed criminal or quasi-criminal sexual wrongdoing. Am. Compl. ¶¶ 45–48. These are not vague insinuations; they are direct accusations of serious crimes.

Second, the statements plainly injured Plaintiff in his profession. They were posted directly beneath Auquan AI’s public hiring announcement and tagged Plaintiff’s employer, making their professional target unmistakable. Am. Compl. ¶¶ 45–48, 67–68. The complaint then

alleges that HR became involved, Plaintiff was called in, and Plaintiff was terminated “due to recent events.” Am. Compl. ¶¶ 69–77. If there were ever a case where the words “tend to injure another in his or her trade, business, or profession,” this is it.

In a recent ruling, this Court held that it “need not address” whether the challenged statements injured the plaintiff professionally because the complaint “plainly plead” that the defendant’s statements charged the plaintiff with a serious crime. *Duncan v. Dick Blick Holdings, Inc.*, 88 Misc. 3d 1212(A), 2026 N.Y. Slip Op. 50082(U). The Court further rejected the argument that accusations of “harassing and stalking” were too “vague and loose,” holding that the complaint referenced the statements with sufficient particularity to satisfy CPLR 3016(a).

That reasoning applies with even greater force here. The statements alleged in this case are more explicit and more directly criminal than those in *Duncan*. There, accusations of harassment and stalking sufficed. Here, Plaintiff alleges that Lefkowitz and/or affiliated accounts branded him a “confirmed sex offender” and a “RaPist.” Am. Compl. ¶¶ 45–47. If the allegations in *Duncan* were sufficient to plead defamation per se, then these surely are.

**f. The Statements Are Not Protected As Non-Actionable Opinion or Hyperbole.**

**1. The Alleged Statements Are Not Non-Actionable Opinion.**

Lefkowitz next argues that Plaintiff’s defamation claims are meritless and does so by attempting to trivialize the statements at issue as mere “hyperbole,” “invective,” or nonactionable opinion. That argument fails as a matter of law.

Under New York law, three factors distinguish an actionable statement of fact from nonactionable opinion: “(1) whether the specific language in issue has a precise meaning which

is readily understood; (2) whether the statements are capable of being proven true or false; and (3) whether either the full context of the communication in which the statement appears or the broader social context and surrounding circumstances are such as to signal . . . readers or listeners that what is being read or heard is likely to be opinion, not fact.” *Brian v. Richardson*, 87 N.Y.2d 46, 51, 637 N.Y.S.2d 347, 660 N.E.2d 1126). “[R]hetorical hyperbole” or “vigorous epithet” will not suffice. *Finkel v. Dauber*, 29 Misc. 3d 325, 328 (Sup. Ct. Nassau Cnty. 2010). And whether a statement is fact or opinion is a question of law for the Court, assessed from the perspective of the average reader. *Davis v. Boenheim*, 24 N.Y.3d 262, 269 (2014).

In determining whether defendant's statements constitute actionable factual assertions as opposed to nonactionable opinions, it is necessary to “examine the content of the [statements as a] whole as well as [their] tone and [their] apparent purpose” (*Steinhilber v. Alphonse*, 68 N.Y.2d 283, 293, 508 N.Y.S.2d 901, 501 N.E.2d 550; see *Brian v. Richardson*, 87 N.Y.2d *supra*).

Here, the statements at issue did not merely hint at misconduct or employ vague moral condemnation. Rather, Lefkowitz and/or accounts acting in concert with him posted directly beneath Plaintiff’s employer’s hiring announcement that Plaintiff was a “confirmed sex offender” and a “RaPist,” and further stated that “Eric Spector runs the Murray Hill Guy account,” that he was a “confirmed creep,” and that he had sexual “charges” from several females. Am. Compl. ¶¶ 45–51. Those statements are not nebulous or impressionistic. To the average reader, they mean exactly what they say: that Plaintiff engaged in criminal sexual misconduct, that he was the person behind “Murray Hill Guy,” and that women had made concrete sexual accusations against him. There is nothing vague about those accusations. Either Plaintiff is a rapist or he is not. Either Plaintiff is a sex offender or he is not. Either Plaintiff operated “Murray Hill Guy” in the

manner alleged or he did not. These statements are therefore plainly capable of being proven true or false.

Nor does the broader context signal to the average reader that the statements were merely opinion. This was not a situation in which a speaker used hedging language, speculation, or rhetorical qualifiers that would indicate subjective impression or conjecture. Lefkowitz did not write that Plaintiff “seemed creepy,” “might be dangerous,” or “gave off bad vibes.” Instead, the allegations are that he and/or affiliated accounts used definitive, accusatory language—“confirmed sex offender,” “RaPist,” “confirmed creep,” and “has r— charges on him by several females”—and directed those accusations to Plaintiff’s employer in connection with Plaintiff’s hiring announcement. Am. Compl. ¶¶ 45–48. In that context, an ordinary reader would understand the statements as factual assertions designed to explain why Plaintiff should not have been hired and why others should view him as sexually dangerous.

Lefkowitz’s likely reliance on the informal nature of X fares no better. As courts have recognized, the internet is not a defamation-free zone. Web content “must be assessed on a case-by-case basis,” and the broader social context does not “immunize” communications whose purpose is to disseminate injurious falsehoods. *Eros Intl. PLC v Mangrove Partners*, 2019 NY Slip Op 30604[U], \*16 [Sup Ct, NY County 2019], affd 191 AD3d 465 [1st Dept 2021]: “Although several years ago it was suggested that ‘readers give less credence to allegedly defamatory remarks published on the Internet than to similar remarks made in other contexts,’ *Silvercorp Metals Inc. v Anthion Mgt. LLC*, 36 Misc 3d 1231(A), 2012 NY Slip Op 51569(U), \*12 (Sup Ct, NY County 2012) (internal quotation marks omitted)], this observation, even if it is assumed to be true, should not be read to ‘immunize [content] the focus and purpose of which are to disseminate injurious falsehoods about their subjects,’ *Sandals Resorts Intl. Ltd. v Google*,

*Inc.*, 86 AD3d 32, 42-45 (1st Dept 2011)]. Our ‘broader social context’—a necessary element of the defamation analysis—suggests that online commentary is just as capable as print or broadcast media of inflicting the kinds of harm defamation laws are designed to protect against. *Id.* Indeed, online communications can spread more quickly, and to all corners of the world, than can print or broadcast media statements” *Id.* (emphasis added). “Ultimately, context is more than just the medium through which a statement is conveyed; it is a holistic inquiry concerning “the content of the communication as a whole,” including “its tone and apparent purpose” *Brian v. Richardson*, 87 NY2d 46, *supra*.

Here, the pleaded context cuts decisively against any suggestion of protected opinion. Plaintiff alleges that Lefkowitz cultivated him in a private friendship and collaborative online relationship, then, after the relationship deteriorated, threatened Plaintiff, called him an “enemy,” threatened that he would “face a dox,” admitted “I sent your name,” boasted about “kicking you and doxxing you in that chat,” threatened to circulate Plaintiff’s photograph, and then sent Plaintiff a post accusing him of being a “confirmed creep” with sexual “charges,” followed by the taunt: “Good luck. I’m not helping.” Am. Compl. ¶¶ 25–34, 52–57. That is not the context of breezy internet banter. It is the context of a targeted retaliatory campaign.

Most importantly, Plaintiff does not merely allege that Lefkowitz spoke harshly; Plaintiff alleges that Lefkowitz knew the accusations were false. The Amended Complaint alleges that Lefkowitz had insider knowledge of the “Murray Hill Guy” ecosystem while simultaneously knowing that Plaintiff maintained a separate online persona, “Marvin” / “@goonboss\_.” Am. Compl. ¶¶ 41–44. It further alleges that Lefkowitz was personally motivated by resentment and vindictiveness once Plaintiff distanced himself. Am. Compl. ¶¶ 25–34. Thus, this is not a case where the defendant innocently misunderstood facts and then expressed an opinion based on

disclosed information. Plaintiff alleges that Lefkowitz knew Plaintiff was not the rapist, sex offender, or “Murray Hill Guy” figure that he and others publicly portrayed, yet proceeded to threaten, dox, and falsely accuse Plaintiff anyway. That is the opposite of protected opinion. It is defamatory falsehood uttered with actual malice.

Calling someone a “RaPist” or “confirmed sex offender” under his employer’s hiring post is not “internet opinion.” It is a factual accusation of criminal sexual misconduct.

## **2. The Alleged Statements Are Not Rhetorical Hyperbole.**

Lefkowitz further argues that alleged statements are not actionable because they are merely rhetorical hyperbole. This is incorrect for a host of reasons. For a statement to be shielded as hyperbole, it could not reasonably be read to be “stating or implying” a defamatory fact. See *Flamm v. Am. Ass’n of Univ. Women*, 201 F.3d 144, 153 (2d Cir. 2000); see also *Davis v. Boenheim*, 24 N.Y.3d 262, 271 (2014) (“Moreover, they were not ‘rhetorical hyperbole rather than objective fact.’”) (internal citations omitted). “Context is central to this analysis, and the ultimate question is whether a reasonable reader could have concluded that the statements were conveying facts about the plaintiff.” *Goldman v. Reddington*, 417 F. Supp. 3d 163 (E.D.N.Y. 2019) (emphasis added). Indeed, the Second Circuit has held that even general commentary in an editorial can imply facts about an individual to the reasonable reader. *Palin v. New York Times Co.*, 940 F.3d 804, 810 (2d Cir. 2019).<sup>3</sup>

---

<sup>3</sup> In *Palin v. New York Times*, the Second Circuit considered statements from an editorial that stated, while discussing a political shooting, Sarah Palin’s political action committee had “circulated a map of targeted electoral districts that put [Gabriel Giffords] and 19 other Democrats under stylized cross hairs” and claimed the “link to political incitement was clear.” 940 F.3d at 808. In the next paragraph, the editorial stated that, although there is some left-wing political violence, “there’s no sign of incitement as direct as in the Giffords attack.” *Id.* Palin argued these statements implied that she called for violence as a matter of fact. The Times, on the

Thus, Lefkowitz argument fails because the relevant question is not whether the words were harsh or colloquial, but whether a reasonable reader could understand them as stating or implying defamatory facts about Plaintiff. In this case, the Amended Complaint alleges statements that have a precise and readily understood meaning. Lefkowitz and/or accounts acting in concert with him posted directly beneath Plaintiff’s employer’s hiring announcement that Plaintiff was a “confirmed sex offender” and a “RaPist.” Am. Compl. ¶¶ 45–47. Another post stated that “Eric Spector runs the Murray Hill Guy account,” that he was a “confirmed creep,” and that he had sexual “charges” from several females. *Id.* ¶ 48. Those are not vague expressions of disapproval. To the average reader, those statements accuse Plaintiff of concrete misconduct: rape, sex-offense conduct, and operation of the “Murray Hill Guy” account in the manner alleged. Either those accusations are true or they are false. They are therefore capable of being proven true or false and are actionable assertions of fact. The context makes this even clearer. These statements did not appear as generalized commentary in some broad social discussion. They were directed to Plaintiff’s employer, attached to Plaintiff’s hiring announcement, and plainly intended to communicate that Plaintiff should be viewed as sexually dangerous and unfit for employment. Am. Compl. ¶¶ 45–51, 67–77. A reasonable reader would not interpret “confirmed sex offender” or “RaPist,” posted in that context, as mere internet-style venting. A reasonable reader would understand those statements as factual accusations about why Plaintiff should not have been hired and why others should fear or shun him.

---

other hand, argued that these statements are not reasonably capable of being proven false and thus shielded. *Id.* at 816. The Second Circuit found the Time’s argument “goes nowhere” and “that a reasonable reader could view the challenged statements as factual.” *Id.* These statements in the New York Times are much more generalized and rhetorical than the defamatory statements Deadspin published. If a reasonable reader could view those statements as factual, then the reasonable reader would certainly view the instant statements as factual.

Most importantly, Plaintiff does not merely allege that Lefkowitz spoke harshly. Plaintiff alleges that Lefkowitz knew the accusations were false. The Amended Complaint alleges that Lefkowitz had insider knowledge of the “Murray Hill Guy” ecosystem while simultaneously knowing that Plaintiff maintained a separate online persona, “Marvin” / “@goonboss\_.” Am. Compl. ¶¶ 41–44. Plaintiff further alleges that Lefkowitz’s motive was personal animus and retaliation after the relationship between the parties deteriorated. Am. Compl. ¶¶ 25–34. Thus, this is not a case where a defendant expressed an opinion based on disclosed uncertainty or imperfect information. It is a case in which Lefkowitz, as alleged, knew Plaintiff was not the rapist, sex offender, or “Murray Hill Guy” figure he publicly portrayed him to be, yet proceeded to make and/or amplify those accusations anyway. That is not protected hyperbole. It is defamatory falsehood uttered with actual malice.

Finally, Lefkowitz cannot avoid liability by characterizing the accusations as republications of what others were saying. Under New York law, republishing another’s defamatory statement does not render the republisher immune. A speaker who repeats a defamatory accusation remains responsible for the harm caused by that repetition. *Watson v NY Doe I*, 439 F Supp 3d 152, 161 [SD NY 2020] (internal quotation marks omitted) (rejecting argument that “comments are ‘republications’ of the comments of others and that therefore (defendant) cannot have liability for defamation”). Accurately republishing a defamatory statement is still defamation. *Schoepflin v Coffey*, 162 NY 12, 18 (1900) (stating “principle that every person who repeats a slander is responsible for the damage caused by such repetition”); *Biro v Conde Nast*, 883 F Supp 2d 441, 461 (SD NY 2012) (noting “well settled” principle that “(d)efendants cannot escape liability simply because they are conveying someone else’s defamatory statements without adopting those viewpoints as their own”); see also *Franklin v*

*Daily Holdings, Inc.*, 135 AD3d 87, 94 (1st Dept 2015) at 94 [“Although it is conceded that defendant accurately quoted plaintiff’s own words from Twitter, that does not necessarily mean that the statement could not have produced a worse effect on the mind of a reader than the truth as alleged by plaintiff”).

**g. The Amended Complaint States a Claim for Negligence and Negligent Infliction of Emotional Distress.**

“Under New York law, the tort of negligent infliction of emotional distress has four elements: (1) breach of a duty owed to the plaintiff, which breach either unreasonably endangered the plaintiff’s physical safety or caused the plaintiff to fear for his or her physical safety; (2) extreme and outrageous conduct; (3) a causal connection between the conduct and the injury; and (4) severe emotional distress.” *Francis v. Kings Park Manor, Inc.*, 14–CV–3555, 2015 WL 1189579, at \*13 (E.D.N.Y. Mar. 16, 2015) (citations and quotation marks omitted).

In the case at bar, the Plaintiff has sufficiently stated an alternative claim for negligent infliction of emotional distress by showing that Lefkowitz’s negligent act of posting unsubstantiated and inflammatory allegations that made Plaintiff appear as a sexual predator in the eyes of his employer was extreme and outrageous. Lefkowitz, as the purported author of the posts, had a duty to Plaintiff to refrain from posting defamatory and falsehoods about the Plaintiff.

**h. Plaintiff Should Not be Ordered to Pay Lefkowitz’s Attorneys’ Fees.**

Lefkowitz is not entitled to attorneys’ fees. Per Civil Rights Law § 70-a (1) (a), “defendant may recover its damages, including costs and attorney’s fees, from the plaintiff if it is shown the action ‘was commenced or continued without a substantial basis in fact and law and

could not be supported by a substantial argument for the extension, modification or reversal of existing law.” *Haart v. Scaglia*, 78 Misc. 3d 1238(A), 187 N.Y.S.3d 923 (N.Y. Sup. Ct. 2023).

#### **IV. CONCLUSION**

For all of the foregoing reasons, Plaintiff respectfully requests that the Court deny Lefkowitz’s motion to dismiss in its entirety, together with such other and further relief as the Court deems just and proper.

Dated: April 29, 2026

Westport, Connecticut

---

Jeffery L. Ment, Esq.  
**THE MENT LAW GROUP, P.C.**  
225 Asylum Street – 15<sup>th</sup> Floor  
Hartford, CT 06103  
(860) 969-3200

#### **CERTIFICATION OF WORD COUNT**

Pursuant to Rule 202.8-b of the Uniform Civil Rules for the Supreme Court I certify that this document therefore complies with Rule 202.8-(a). This certificate was prepared in reliance on the word count function of the word processing system (Word) used to prepare this document.

Dated: April 29, 2026

Westport, Connecticut

---

Jeffery L. Ment, Esq.  
**THE MENT LAW GROUP, P.C.**  
225 Asylum Street – 15<sup>th</sup> Floor  
Hartford, CT 06103  
(860) 969-3200

11:57

Signal strength, Wi-Fi, and battery icons

< 106



Rob

Hahahah

Keep it

Tweet idea for you



"I like every one of my tweets, if you don't like yourself neither will your hinge date"



Girls who take the bus are way hotter than girls who take the subway

(My girl takes the subway)



Lily Philips and that other whore ruined the British accent

^

If a girl is shaving her legs daily and doesn't have a boyfriend, she's a whore

If a girl doesn't shave her legs daily while she has a boyfriend, she is the alpha in the relationship

But also disgusting ^



12:28

< 106



7. Priority doesn't play a...

It's literally on the street lmao

Like on 32nd

It's over for u

Good

Good caption or should I change?

Put alpha back in your name

I thought you could do better

I will soon

Shoulda say like "got my girl some Zara stuff and her ass looks like this.. chat should I break up?"

Next time

No one's even seen it

16:42  
 Messages  
 Marvin  
 894 posts  
 Posts Replies Videos Photos

< 106



Rob

R u going?

I thought we were going to the event with with Degen

I bailed

Too many ppl don't like me or Marvin

Bailed from what?

Also I'm not Marvin - do people have a problem with Eric?

The party

No they like eric

What petty

Party

Degen

Miami time

Today 8:43 PM

Hi, is this Katie from the dmv?  
(This is Eric, also from the dmv)

Delivered

< 106



Rob

Ofc

I'll send that message

If you help me with my next viral tweet

Murray Hill Guy's Twitter Goals:

- Go viral for a tweet so dumb people think it's satire, but you meant every word ✓
- Gain 15K followers without tweeting a single sincere sentence ✓
- Get ratio-ed by a 23-year-old with 200 followers who calls you "racial slur" ✓
- Make someone end a relationship because your tweet hit too close to home ✓ bonus, hook up with them after ✓
- Get blocked by at least three accounts with >100K following ✓
- Have a tweet printed out and mailed to you by a crazy ex ✓
- Post a tweet so deranged it gets screenshotted and put in a

< 106



Rob

No Saturdays suck

Also getting flamed for stealing tweets would be hilarious

Bro we already did

It's risky

Try and see

I hate deleting my good tweets

Alright fine

But we get caught

I do t get why they do t take off



You're my ALT

Ok

Reword

My Friend's mom started taking ozempic and looks really good now. She's been low key getting flirtier anytime I see her. Should I go for it? Not like he's my best friend or anything

12:07

Signal strength, Wi-Fi, and 35% battery icons

< 106



Rob

Dude you're gonna get a million

I've never

Fuk you

Remember when I said in due time?

The time is now...

For what

Idk just in general

To unleash

All bangers

You're a genius

Together are unstoppable

You're on fire

I have even more ideas

The best account on X rn

Give me some

12:33

29

< 106



Rob

What ass

Legit lego build

Exactly

I have a good troll

Need your help

Guaranteed 100K

Gonna remove your contact for a second

Ok... text me the following. Copy and paste this:

Hey Robby! I hope this isn't weird, but we matched on hinge last week, and you may not have saw my message. I actually saw we actually have a mutual friend (Jess) and she gave me your number! Would love to grab a drink with you soon!

Hey Robby! I hope this isn't weird, but we matched on hinge last week, and you may not have saw my message. I actually saw we actually have a mutual friend (Jess) and she

< 106



Rob

Bro, I'm kind of nervous I don't wanna get doxed

Might deactivate again

lol

Now you know how I feel

Got like 40 followers today

3 million

Dude my shit is way worse than yours

You can only dox yourself

It's the same

I posted the people in the street and she's

And hinge

Bars\*

If you delete, you can't come back your account is boosted rn

< 106



Rob

account full anon?

You can do that now if you want

Just meant if you wanted goon

May be fun to start fresh tho

What's better?

Is Marvin cooked bc of suspension + deactivation?

It would take a few weeks to gain your algo

Honestly would just start fresh. But make sure you have the blue check

Why check

It's auto engagement

Which one

Cheap?

Yeah the cheapest

I think you should make yourself a chick

< 106



Rob

Nah I've had that

We could do that in a week

Bounce back

This account is run by a 22 year old virgin btw

^

Men, before you get into a relationship, you need to make sure you can carry her.

If you can't, you need to get her on a strict regimen to lose weight until you can.

She'll respect you way more if she knows you can pick her up and put her on your shoulders.

Wait I wanna post that one ^



Don't post

Let me tweak that

Ok

12:32

29

< 106



Rob semi anon -> real

Fine

Make a Marvin

Tell them i realized that I can go viral under my real name now

No screenshots

Remember, Spaniard knows me

I fucked up

Ya that's on you

Can you see any of my posts?

No

Gone

Spaniard is harmless

+ they don't know who you are

Tell Heidi I say bye

21:59

29

< 106



Rob

Apr 6, 2025 at 7:56 PM

I forgot to mention. Me and a few friends use to run a decent sized IG page. It was called "tier police"

Basically Would post couples who were terrible looks matched and people would go insane

Ugly dude hot chick vice versa with a funny comment

But it got reported so many times

Was genius tho

Wow

Watch the social network

I'm literally mark zuckerberg

Hah

He got banned from so much shit

And didn't care

12:10

35

< 106



Any chick that wears pants is a huge whore

Rob

Gents...is it worth it? Not a fan of birth marks (back, near elbow)

LMAO

Yeah that's good

This is same time you posted yesterday

Double down ni\*\*a

Wait cropniut face or no

Crop out

Dude no

It's from 2018 lol

That bitch probs is ugly now

We can't get doxxed from it

Impossible

Gym doesn't even exist

Post

< 106



Rob

I'm gonna say your name isn't eric

But don't dwell on it

Just say she's wrong lol

She's very aggressive

Ignore for now

I'm not answering

Marvin RIP

Let me know if she brings me up at all

She's obsessed

Why

Probs likes you

Yeah she was touching me a bit at the bar

Or you mean Twitter

< 104



Rob

Bro I already posted that shiz

Wtfff

I'm the hinge guy come on

Delete plz

I'm growing the alt

Only if you hand me a banger

Nah delete

I'll give you plenty



You had the banger of the year dude

You were the only one with some big burner accounts

The picture

If you tweeted "why am I with these fags"

100K views you woulda been put on the map

???

< 106



Rob

Love it

Dude help me add

Post at night

I help u so much

Too long

It's not that long

It's fine

Just edit it a bit

Just make a separate post

No

It doesn't need editing

Add one more

Makes over 150,000



< 106



Rob

lowkey gay as a man to like another man's voice. like bro you're literally swooning over another man's mating call

Draft these

You're on fire today are you gonna post those?

Don't tweet all at once

Nah alll you

Y

I'm tryna grow your account low key

Mines cooked

So is mine

It's gonna get literally banned soon

I wanna get you to 1K by end of month

Nah I've had that before

12:00

35

< 106



Rob

0 views??

Be a reply guy during the day

Poster during the night

For 1 week

As in big accounts and reply immediately?

Let's work together bro

But yes

Let's make a funny list for me to post

Later

"Automatic block list if she..."

- Owns a cat
- Has tattoos
- Doesn't workout
- Complains
- Loves the movie Saltburn
- Has a gay best friend
- Vegan

Yeah let's make this good

< 106



Rob

Lol

Bro, why not just retweet me though

I don't want you to be known yet

It's not time

Dude delete

Called a chick from hinge and a dude picks up and goes "She's busy bro"

She texts back an hour later apologizing and says her ex just came by to grab his things.

Is she still worth going out with?

Let me tweet that

Such a banger

Send something to me I gave you one

Bro stop making me delete bangers

Just post yourself

12:16

34

< 106



Rob

There's your post

I realize how ^

Tag?

No tag

With her pic?

I'll send it to her

Yes



Fuking dead lol

Now you wait

Next post:

Fell in love with a stripper back in 2017... her whole body was tatted. Just saw she got engaged today and has 0 tats.

Feel bad for the husband as he'll never know of her past.

Edited

< 106



Rob How much faster

Wym how

No I didn't

It took time

Your path is faster

I think I have to delete though because in the past, I used to DM people, even though I never really gave my name

You'll be at 1K by end of month

They won't remember

Just change your profile pic every few weeks

Make it a fat lady

Later

Yep

Gym time

Moment of truth

< 106



Not worth all of t Rob

I can just sign up in 12 months with a different email if I want

Bring back Marvin

It's time to really get after this shit now that I have time to do whatever I want

Marvin was doxxed



He's only doxxed if you admit to it

And do what James did

Wym

Clean wipe?

Like west village guy is now James

You can make a new account

And never tell anyone

So why keep Marvin

12:28



< 106



Rob

Ok

Change name to Donald

Marvin to Donald

Sunday best day to post

Sundays, tuesdays at 12,  
Thursdays at 5

Lmao I have no followers or following

1 Reply

Dude you don't understand how hard it is for guys to grow. You had 300% growth in 3 days



Yeah it's not the end game but it's to test shit out

Lmao I have no followers or following

When I said this, I mean, it literally says zero

< 106



Rob

I'm gonna post the Foods

What

I'm gonna show u my old account

Read all of my old tweets

You can steal any of them but ask me first

Sent in DMs

It's the best account on Twitter

If you eat Greek yogurt at your desk in the bullpen you deserve for all of your excel files to crash

I have an hour in between business calls. Chat do I...

- A. Jerk off
- B. Swipe on hinge
- C. Call my Mom
- D. Hit the gym

Tweet that rn lol

I'm too good at this

12:06

35

< 106



Rob

Actually???

Seems beta

It's for the views trust me

She's so easy to control

Hey, can you please delete your post? My mom found it somehow

Just do it

Yes

No

Make it actually seem real

Saying "hey can you please delete your post? Someone in my real life follows your and I don't want them to see"

My girlfriend found it

That works

Make it seem real and genuine

Do it?

< 106



Rob

Your thoughts

Yeah

I'm over it

For life

My next bang will be my wife



00:37

Dude, this is why I don't do that anymore. I only go for s... Show More

New York is Midville anyway

Very trrye

Mar 31, 2025 at 3:28 PM

There needs to be a law, any chick over a 24 BMI can't wear Yoga Pants.



Tweet that

It's gross seeing fat chicks trying to wear tight yoga pants I just puked

11:54

35



Rob

Holy fuk

My Friend's mom started taking ozempic and looks really good now. She's been low key getting flirtier anytime I see her. Should I go for it? Not like he's my best friend or anything

Let me tweet that

That's PHENOMINAL

Bro I got no likes

Delete

If it got no likes for me it wouldn't do great for you

Ok

Post it then

Not rn

Next week

I should post a picture of me with my handy in like a Doritos bag

< 106



Rob

Block

Will soon gotta gym again

People want Marvin back it's wild

Who??

I didn't think he would be a big thing

Kips bay Ken

Heidi

Tell them hi from me

Taking a nap

Copy

At least now you finally know why I'm a bit careful. You never understood now you do lol

Ken wants me back because I'm his cash cow

Spaniard ruined something big but I don't blame him

11:54

35

< 106



Rob

Being a fat ass

Hand in pants

No man stop gooning

Delete your mom Ozempic tweet

It sucked

Y

Cause I want it

U said it sucked

Yeah for you

Let me try

You stole my starter pack tweet

We're even if you delete

Just post it tomorrow

Literally nobody knows my account

No Saturdays suck o

12:05

Signal strength, Wi-Fi, and 35% battery icons

< 106



Rob

Wym

We wait

Delete?

You got the Carl marks response bro

Dude I got one for you

NOW

Dm Carl marks

Saying "hey can you please delete your post? Someone in my real life follows your and I don't want them to see"

She'll post it

Same thing she did with me

1 million views

DO IT

Actually???

Seems beta

11:56



< 106



Rob

I have nothing

My brain is mush today

Just post

Too much drinking

I'll delete if we have to

Cook something up about speed a girl walks on how hot she is

Just saw mid chick walking so fast

And a hot one walking kinda slow



Adam Sandler is truly the alpha male

- Jewish
- Rich
- Funny
- Nerdy
- A little gay

< 106



Rob

Gay!

How do I get her off my case

Don't do that

You're on fire

You don't

You double down

She's obsessed with you now lol

It's right where you want her

Does AI know my real name

No

No one knows anything

Has she doxxed in the past

And they never will

No

Get back

Looks sketchy now they all

< 106



Rob

Boss yelling at me

Wtf

5 million views in 4 hours for you

Twice

That rat

Literally goated

No one else can do that

Your pics and captions

Time for insta

Twitter is such a waste

I had a dream about it

You're seeing it wrong

It's not a waste

But you're right it's not going to make money. It's for connections tho. We wouldn't have met.. I wouldn't have met PWF/signul



< 106



Rob

Ok

If I see a couple and it looks like he can't lift her, that man either owns property or is hiding a monster in his pants—no other explanation.

Hahhaha

I'm posting that one

Dude

Delete your account

Y

I can't get in crunch

Wtf

I swear

I'm sad

Ok

Damn

Can you use another location?

< 104



Rob

Dating as a mid to late 20's male is either picking the young party girl who won't care for you or the 30's girl who will pick almost anythi...



%

^^

Banger

Trust me

For me?

I mean I'd like it

Ok

But you can have it

Delete hinge

Your captions needs to be better

Yeah

5:23



< 22



Rob >

Well my account fucking sucks dude. Literally look at it vs Dimitri and others. I suck. This is the first post that has done anything (it still sucks lol)

Your friend is not at risk I'm trlling you

If he is any risk it's deleted

I promise

You also don't send me anything so I know you won't anymore I wish you did tho

Dude I try to help you I just work a lot

I spend less time on Twitter

< 104



Rob

Mar 25, 2025 at 1:48 PM

Women should not be allowed to drive

Mar 25, 2025 at 6:51 PM

Today 8:38 PM

When you drive you're usually in the other lane, right? And I'm gonna be about 100 cars up into your 3 spot until you're done.

1 Reply

I've been thinking about this since yesterday



And yet you cancelled

Stupid slut  
Delivered Quietly

Meg has notifications silenced  
Morning Anyway



Need help

19:42



+1 (773) 274-2919

Share your name and photo?  
Robby Lerko  
Where was the bachelor party?

I was planning our wedding tho so dw

Me too luckily this wasn't at the beach.. was the opposite at the Pocono's. That's all I can legally say tho



OUR wedding? Wow we're moving fast all of a sudden

< 106



Should be the crisps or the flats: Rob

X Marvin (@goonboss\_) x.com

Weak

Y

Gotta make fun of her no ass

Flats



If you're lasting longer than 3 minutes during sex with your girl, you need to break up. She's probably not hot enough

Truth



lowkey gay as a man to like another man's voice. like bro you're literally swooning over another man's mating call

Draft these

You're on fire today are you gonna post those?

8:47 AM

70

< 104



her your pictures

Rob initiated divorce

Too old. Need 17-22

You have a female fan

Lucky

Wym

2 more followers lfg

Make sure you follow them back you need to keep fans not lose them

Also be a reply guy sometimes

Ur right

Ik I had to do it

Have to put in the work to become great

Just like anything else



< 106



Rob



Rate proposed Community Notes

This image is AI.

See the woman's strange hand, or the AI symbol in the bottom right...



3 million u win

If it's this easy...

Can take over the internet

Fax

Post another

Come on

Like what

The ones I sent

Just AI them a bit

Give me something I suck

12:29

Signal strength, Wi-Fi, and 29% battery icons

< 106



Rob

Hide faces

Apr 13, 2025 at 8:21 PM

Alright help

I need an amazing caption



My most irrational fear

**Seeing myself on a  
Murray Hill Guy  
Hinge screenshot on  
twitter**

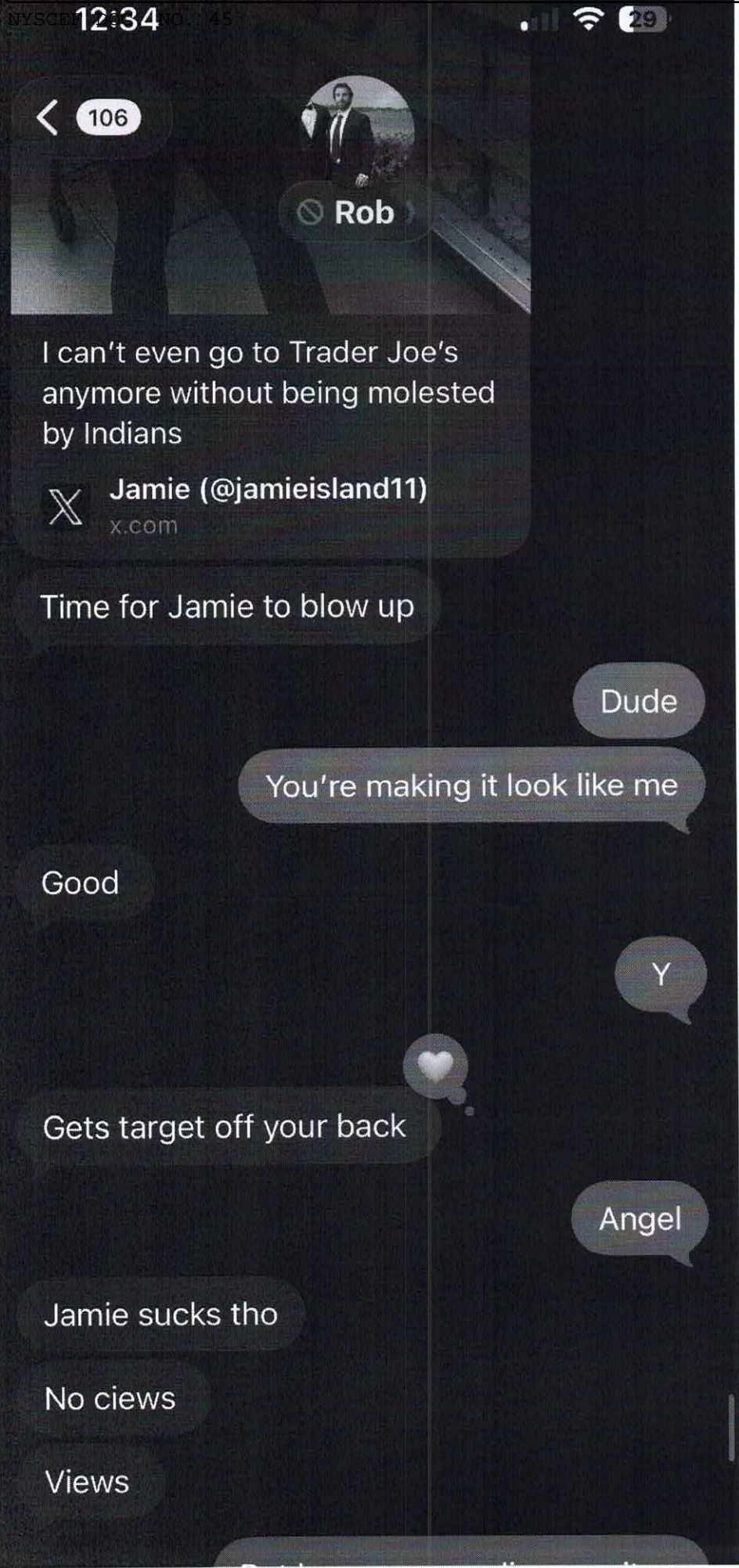
I just made this lol

Obvi not real lol

Caption?

Not real?

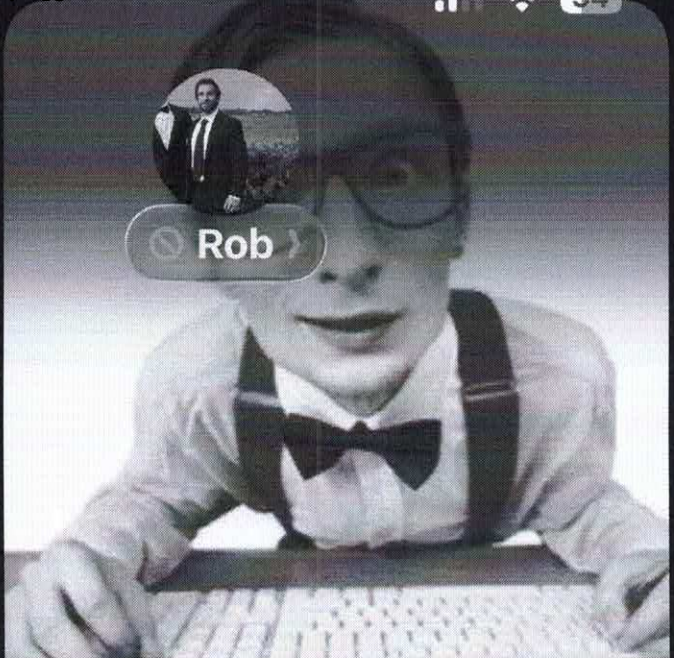
No lol



12:16

34

< 106



Fell in love with a stripper back in 2017... her whole body was tatted. Just saw she got engaged today and has 0 tats.

Feel bad for the husband as he'll never know of her past.

X Marvin (@goonboss\_)  
x.com

HAHHAHAHAH

banger holy shit

I need that pic

Should I tag people like Dimitri in any?

Tag cornbread fuk it

In her post

If she comments you win

< 106



stabbing gym whales with  
(in good)



Rate proposed Community Notes

1:13 PM · 4/14/25 · 1M Views  
226 78 88 19

1 million!

What is community notes I've never got that

What's shrink?

Just a saying like trash

on code: b

Does this mean they can see my phone number?

< 106



Rob

my favorite ani.  
best friend when she's  
single and thriving



TikTok  
@naomibe

19:30 3/30/25 292K Views  
98 61 1K 583



Holy fuk

You're getting replies

Delete your CT tweet

Lll will think it's me

Ppl



Or do y wanna be my alt

Bro chill

Nobody notices me except that  
one dude one time

< 106



Rob

Post this



ESPN isn't dumb putting the hotter chick on the left... Houston is winning

Add to it

That may go viral lol

I don't understand your caption

It's sports

Hotter chick is under the name Houston

And they put a midder for Duke

Bro, my account is gonna just become straight porn at this point

< 106



Rob



I got 250 followers I'm up to 15K I may have found something



1 Reply



Edit this with AI change up colors,  
Caption:

"Going to start walking around gyms and stabbing chicks with olympic"

12:06



< 106



Rob >



"None of these peasants know I have the best burner on this app"

Dude you're gonna get 1 million

I've never

Fuk you

Remember when I said in due time?

The time is now...

For what

Idk just in general

To unleash

< 106



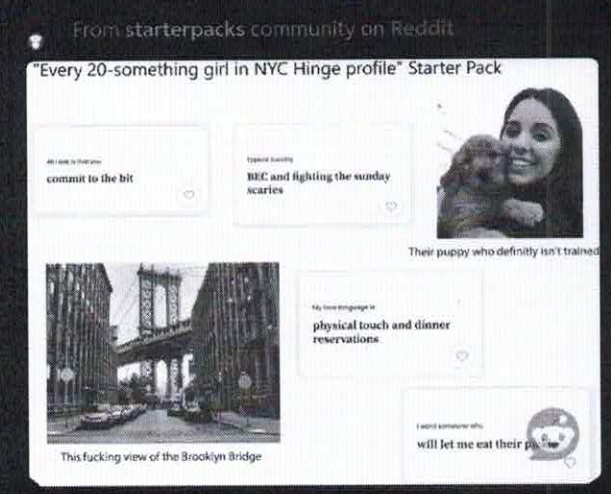
Rob

5 hours

Number 1 post on X is wild

How do you know that

Cause I've never seen a post blow up that fast



Apr 7, 2025 at 9:19 PM

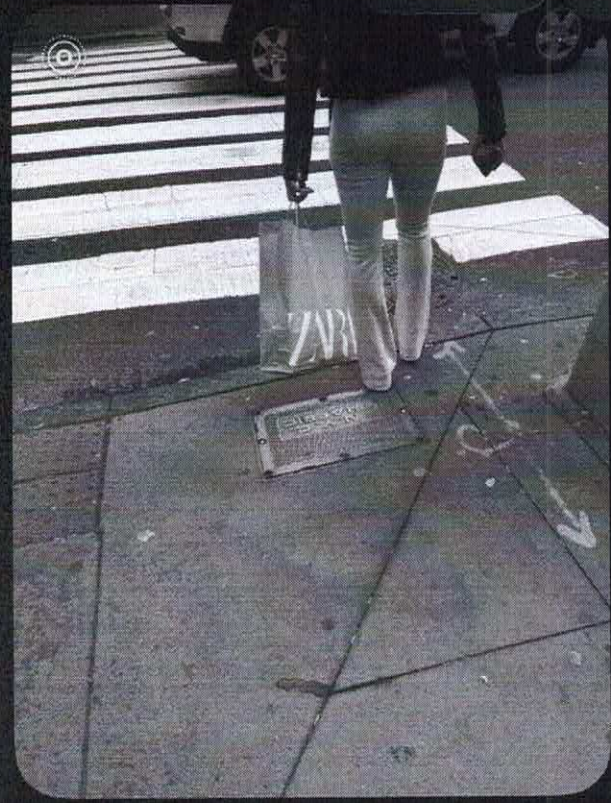


12:28

Signal strength, Wi-Fi, and battery (29%) icons.

< 106

Rob



Live pic lol

10  
Million if you caption it right

I'll post it in a second

Don't rush it

It's a gem

Watch you get banned from  
Zara

There's no way to detect where  
that is



12:27



< 106



Rob

Apr 12, 2025 at 8:26 PM

Unleash goon lord

It's time

Give me a banger

Chick at gym

Screenshot a vid or three

It can't be your first post

You gotta post random shit for 12 hours so algo gets you back online

Tomorrow night you'll be fine

People are asking where you are tho

Who



If anything it'll be good for networking

PWF

< 106



Rob

What about her



Post this

Y

If you get her to comment you win

Cause she gets pissy

Automatic 100K views

Very easy to trigger

Next post use her

< 106



Rob

Marvin (@goonboss\_)  
x.com

What should I say about her?



Nothing

Comment

Just add her to a post haha

Just post her pic or what?

Nooo

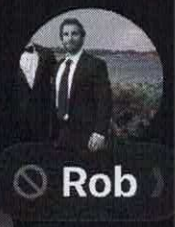
Any normal post



12:11

35

106



Rob



There you go

Looks good now

Delete doughboy and fellas left and right

Shit sucked



All I ask is that you  
Are actively working  
on yourself. You  
value mindfulness

< 106



Rob

Going out in the Lower East Side you're either a 22 year old or a 38 year old trying to hook up with a 22 year old

Murray Hill Guy (@MurrayHillGuy1)

x.com

Mar 29, 2025 at 11:43 AM



Today

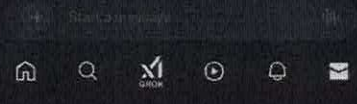
Can I see the original photo pls.  
Porn makes me cry...

You've declined the request

Wym

Because it's so superficial and I miss making genuine love, not sex  
But I'd rather be lonely than be on dating apps, senselessly hooking up

What original pic?



11:43



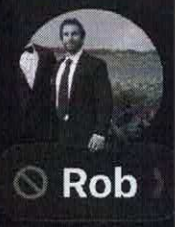
murray hill guy  
I think she's in love with me! That's why she blocked me

I actually asked the AI model to chink it

Murray Hill Guy @MurrayHillGuy1  
An AI model is the best way to get the truth



< 106



Rob

Lmaoo

Post that

Vaginas are so grotesque man  
I can't look at one for more than  
a few seconds without gagging  
Does this mean I'm gay?

Should I post this

Fucked a Palestinian chick raw,  
nuttied inside, and then ghosted  
& blocked  
That was for October 7th

You post this ^

No politics

Fucked a Swiftie chick raw,  
nuttied inside, and then ghosted  
& blocked  
(Insert something funny)



12:28



58 of 159

< 106



Rob

...and I can't seem to get it right and that's on me. I'm stressed in my own life so maybe I'm not meeting my own expectations. But as a result it seems to be causing a lot of small arguments and back and forth between us and I honestly don't have the headspace to do that right now. It seems as if these past few days have honestly been worse than it's been in the past and it's mentally and physically exhausting for me

...you or stresses u out or what not and i can't seem to get it right and that's on me. I'm stressed in my own life so maybe I'm not meeting my own expectations. But as a result it seems to be causing a lot of small arguments and back and forth between us and I honestly don't have the headspace to do that right now. It seems as if these past few days have honestly been worse than it's been in the past and it's mentally and physically exhausting for me

Yeah agreed. Sounds good to me. Best of luck

I'm really glad u had a lot to say back to that really shows how much you cared.

Excuse me? You literally just texted me that and didn't have the decency to call me.

Post these without the contact name lol

Jajajja

Let's roll

Apr 13, 2025 at 1:09 PM

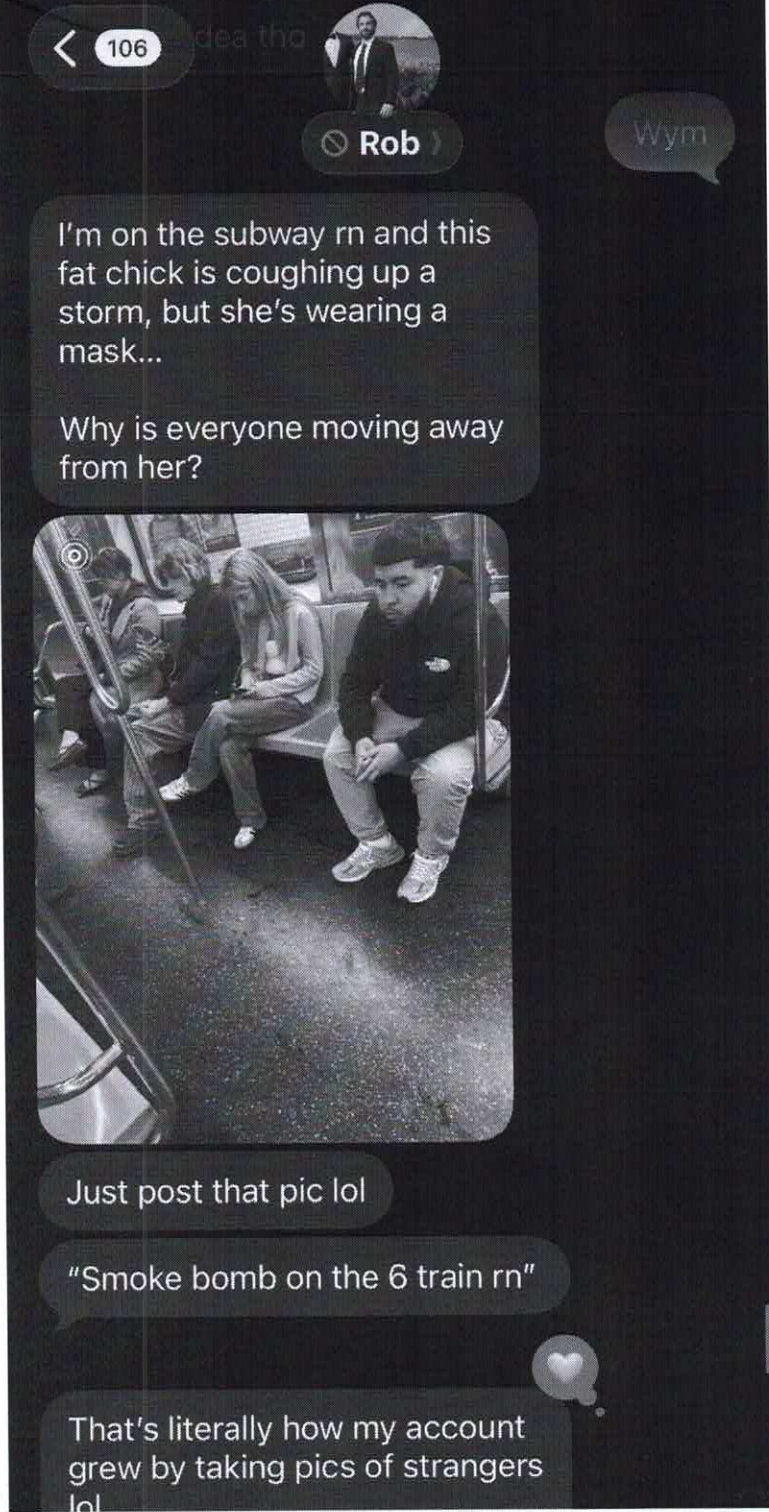
Gimme some bangers

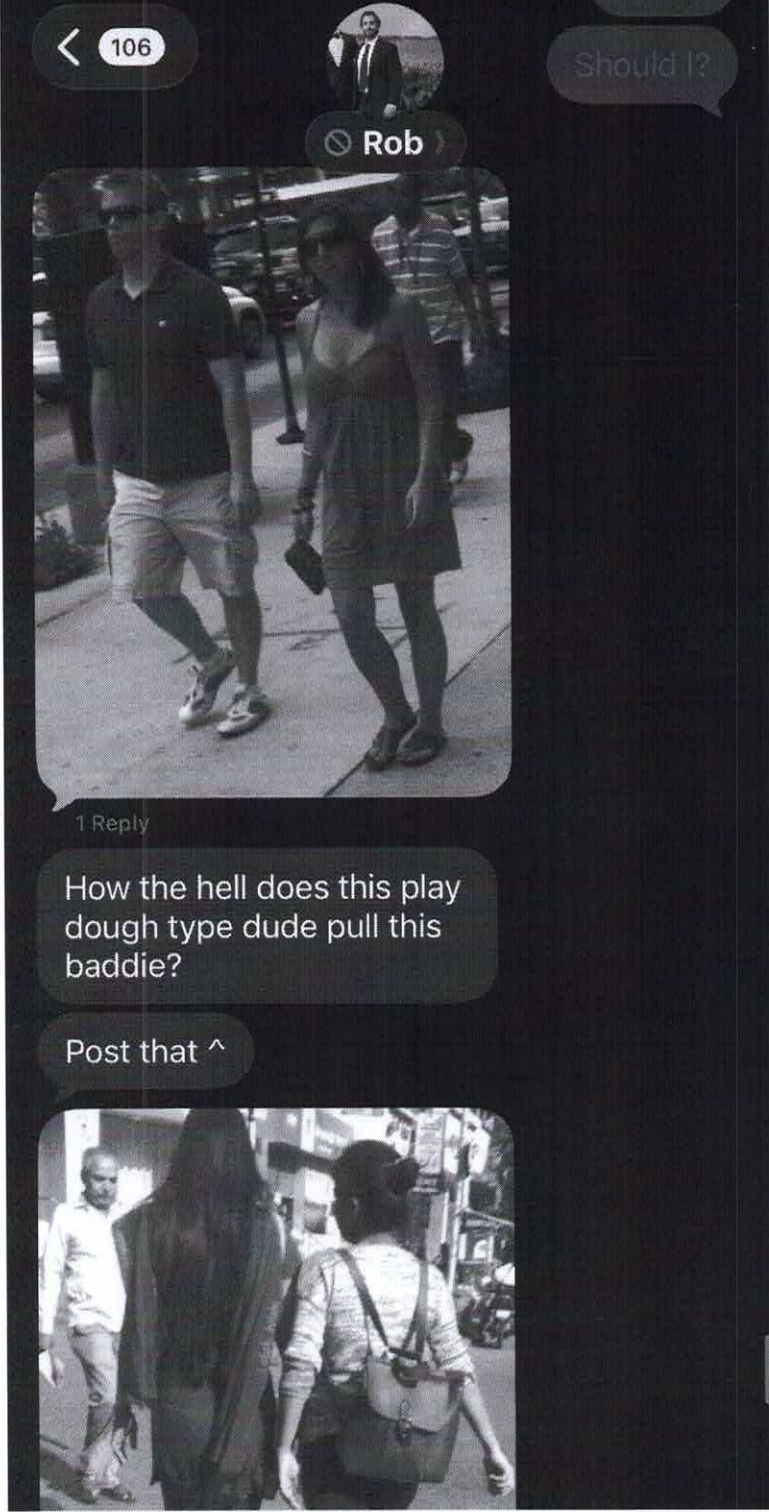
1 Reply

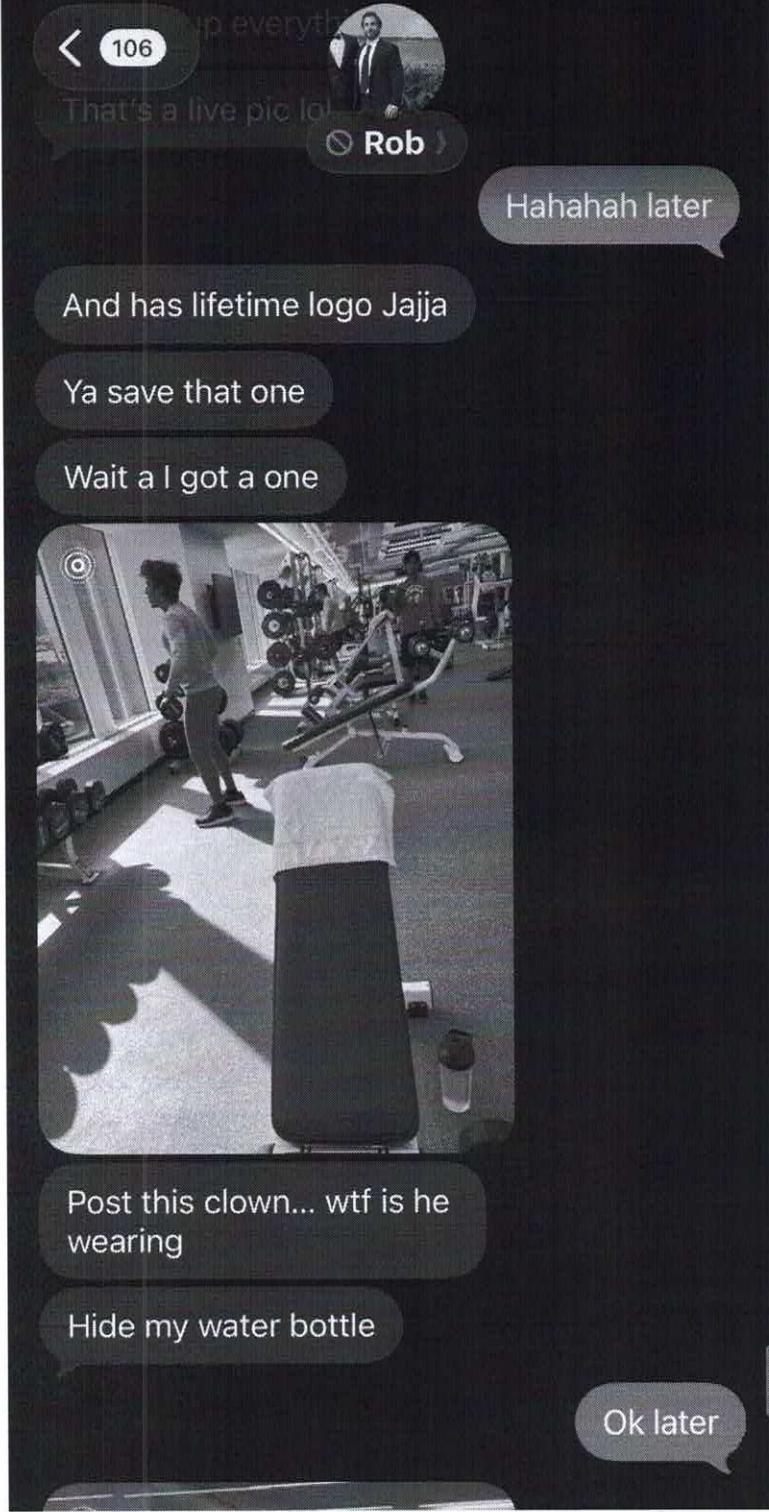
I'm back

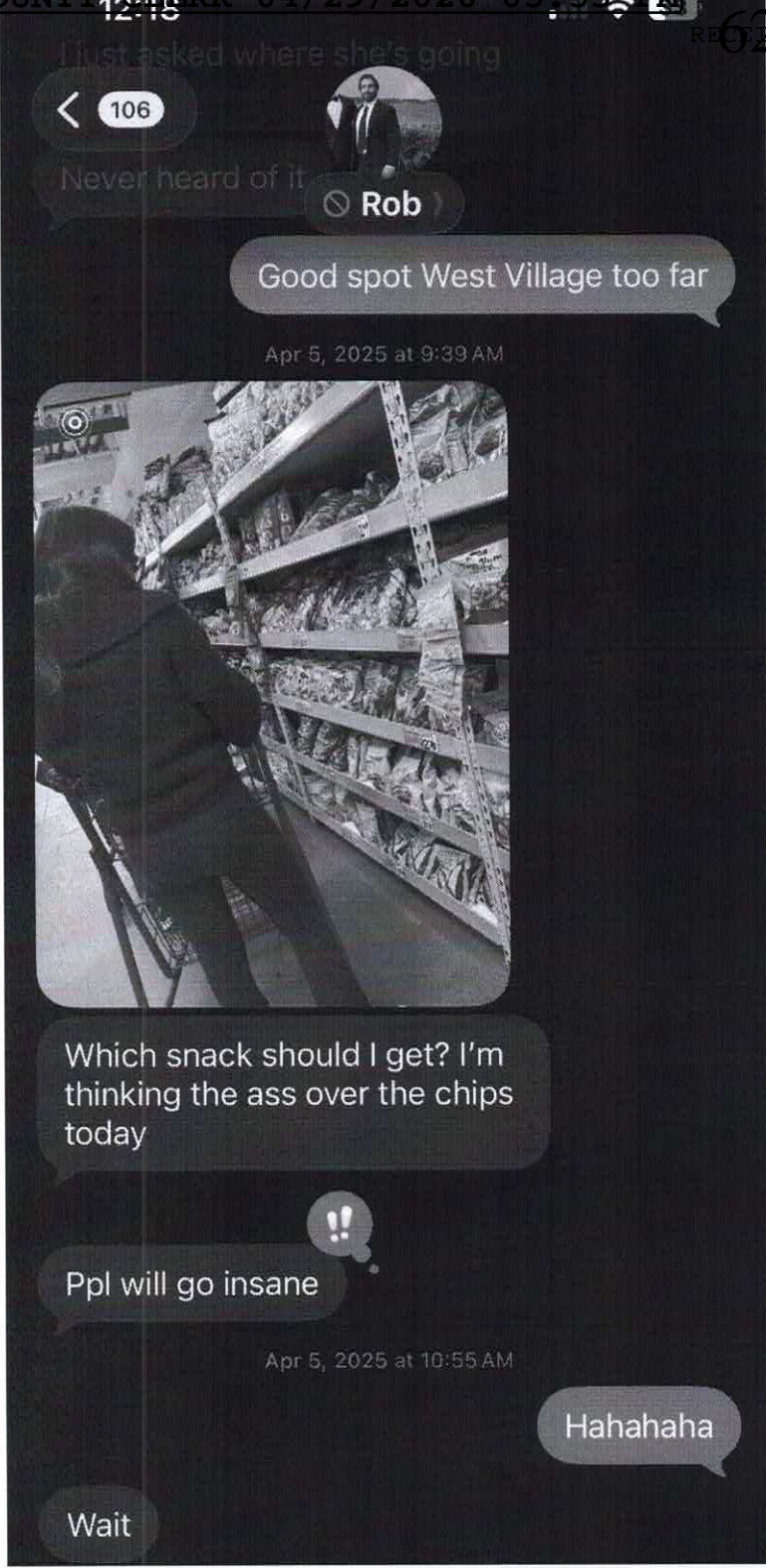
3 Replies

Wtf is this









I just asked where she's going

< 106



Never heard of it

Rob

Good spot West Village too far

Apr 5, 2025 at 9:39 AM



Which snack should I get? I'm thinking the ass over the chips today

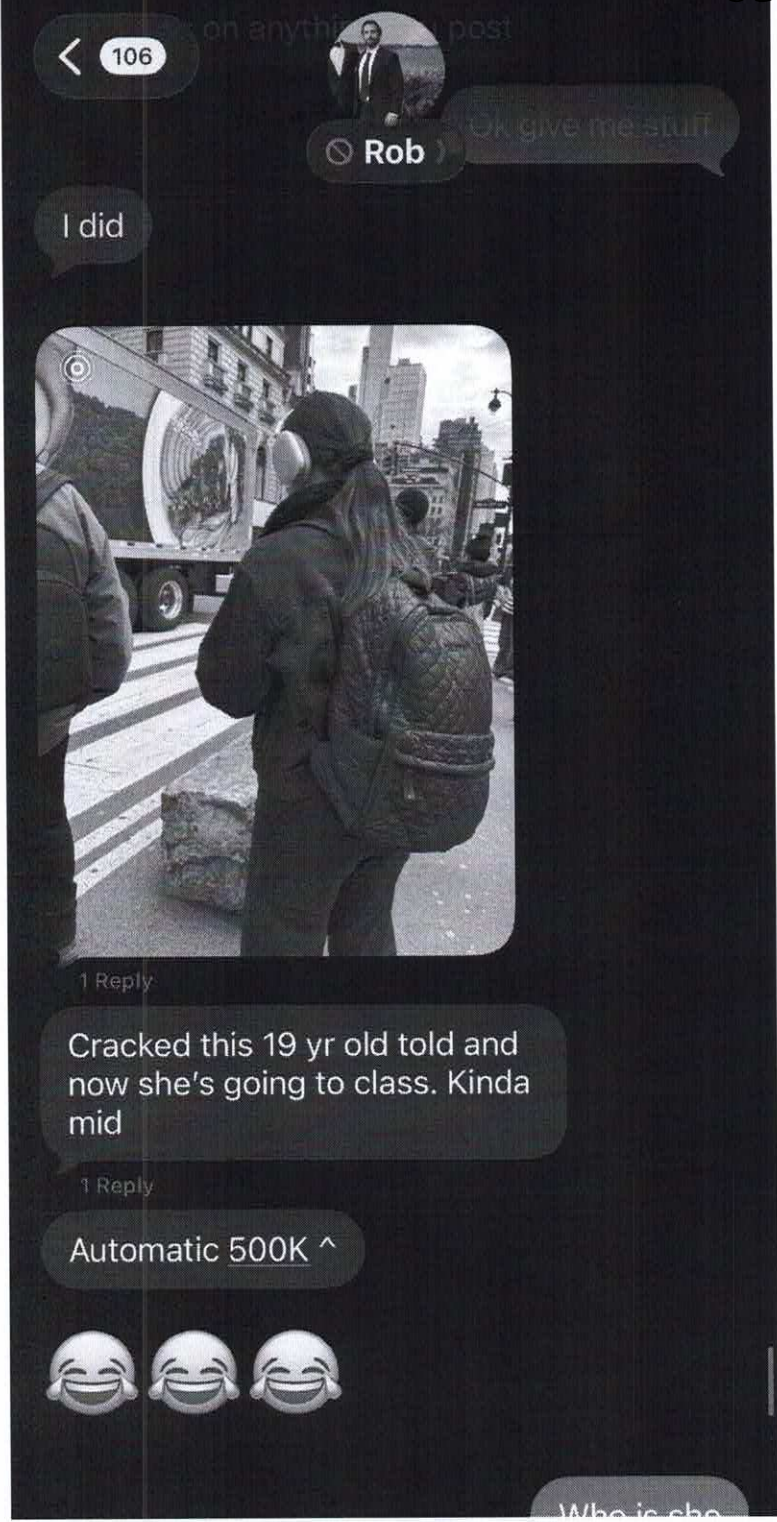


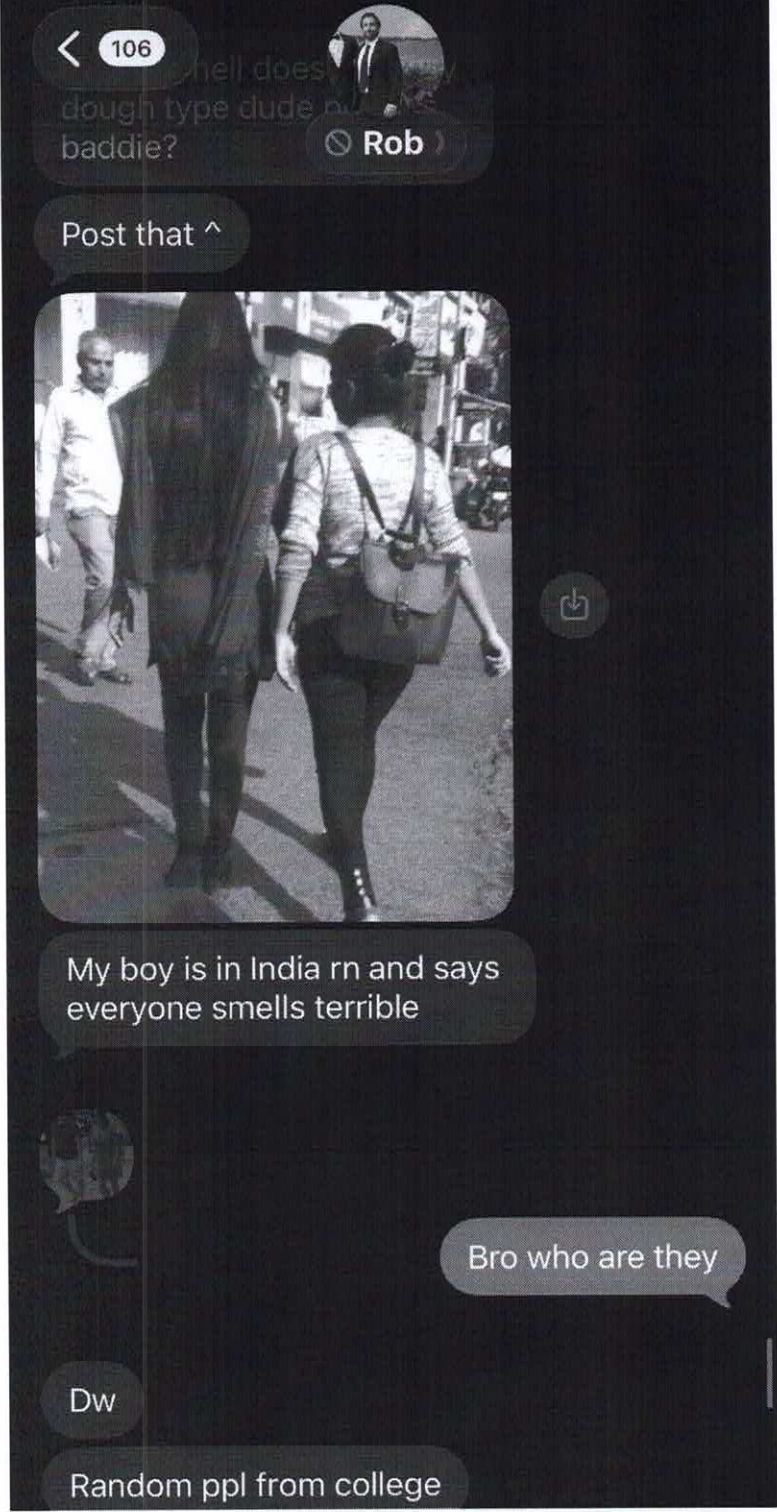
Ppl will go insane

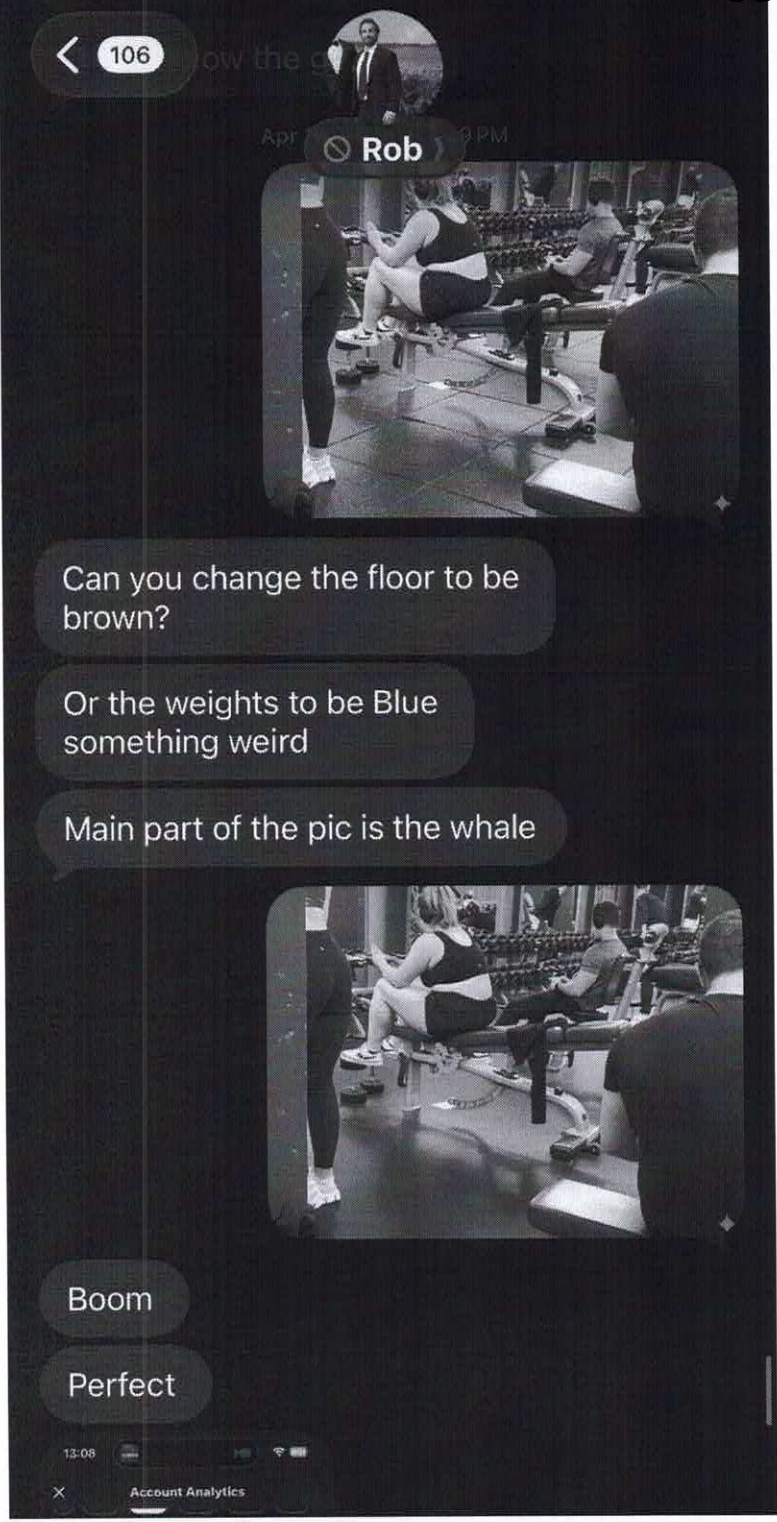
Apr 5, 2025 at 10:55 AM

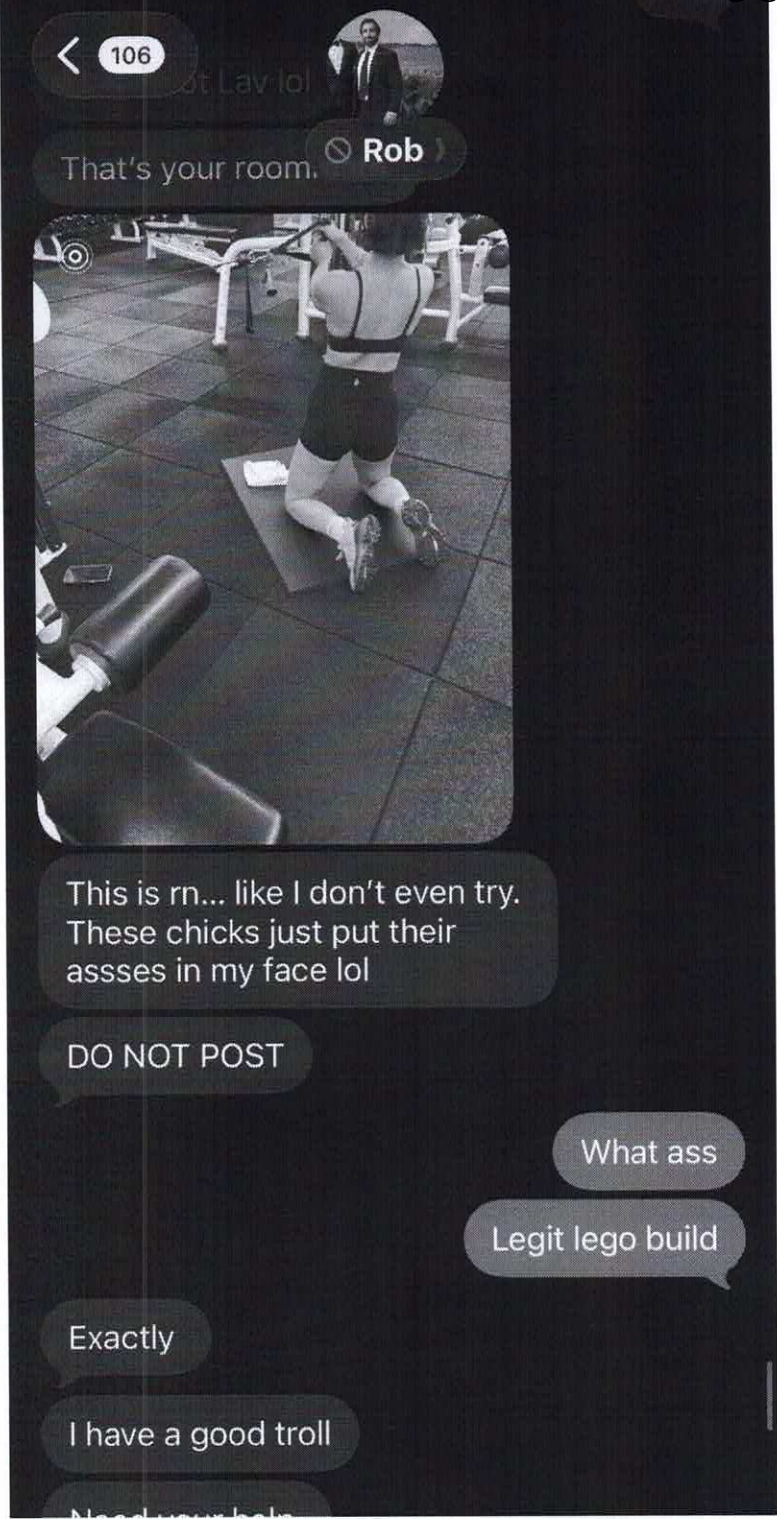
Hahahaha

Wait









< 106

That's your room. Rob



This is rn... like I don't even try. These chicks just put their asses in my face lol

DO NOT POST

What ass

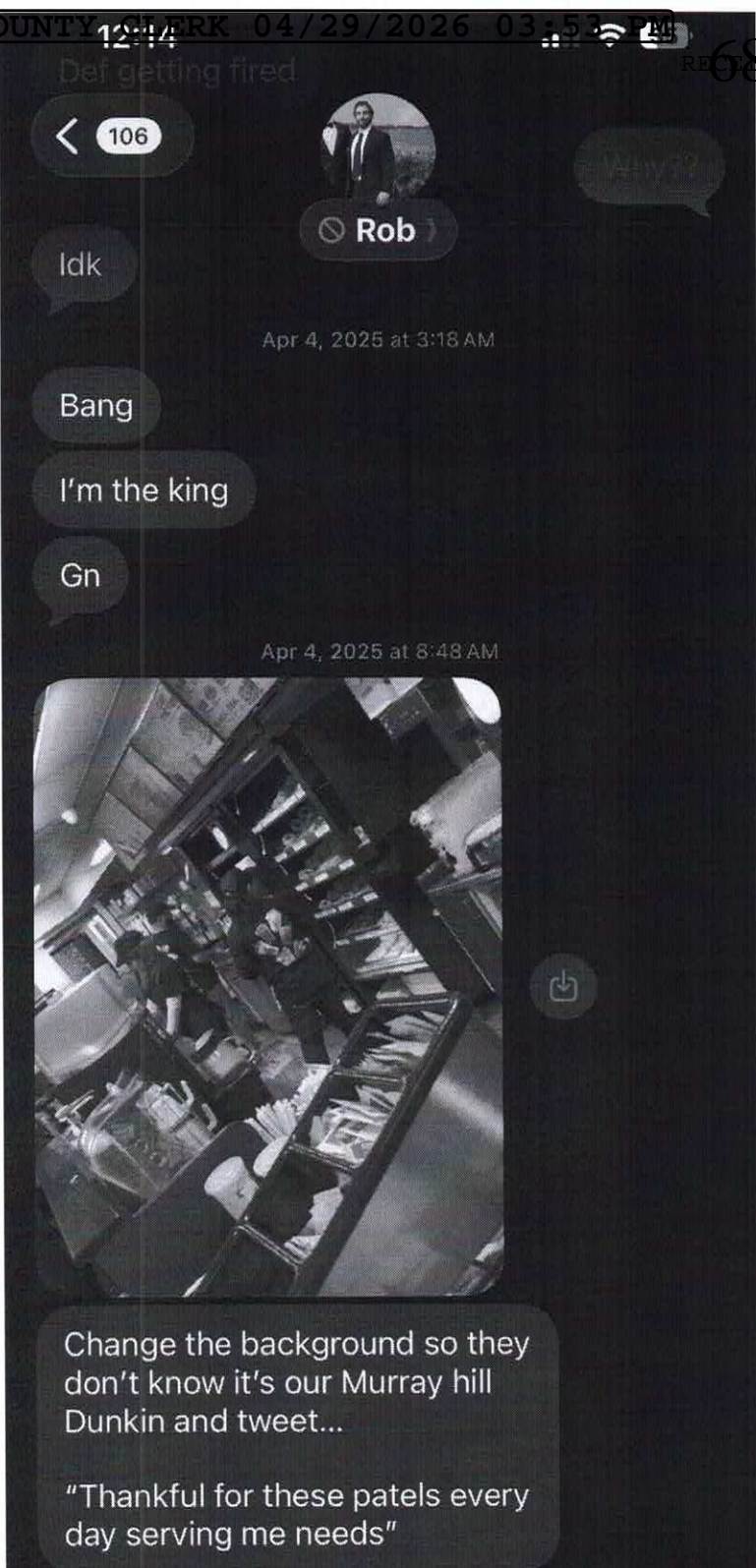
Legit lego build

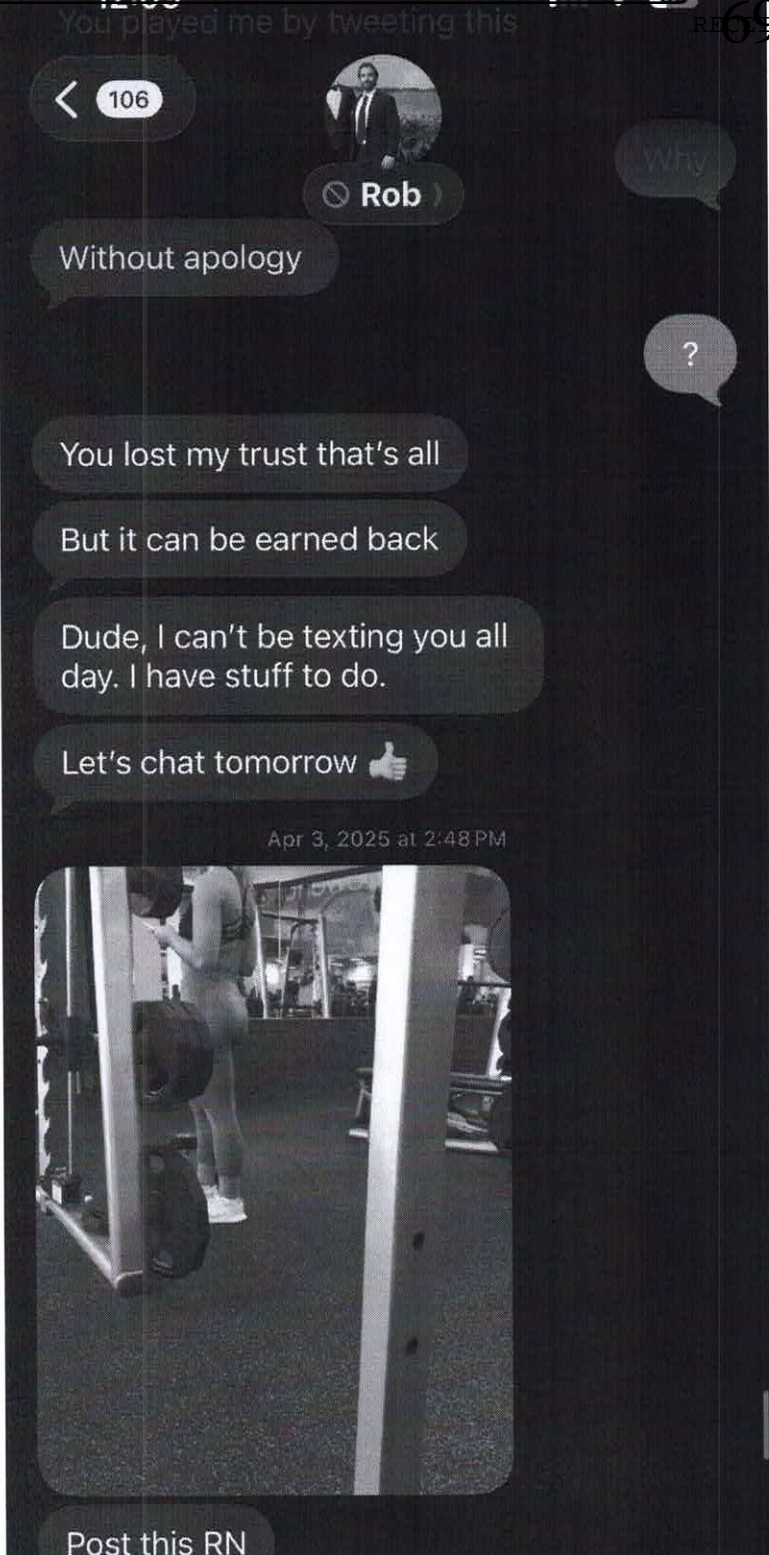
Exactly

I have a good troll

Need your help







12:06

35



Chat, what do we think here?  
I'm giving her a 6/10

NO WAIT

Chat, this chick just took the 6  
from union square to 23rd  
street.

1 stop, really?

Maybe if she walked she  
wouldn't be a 6/10 fat ass.

#Lank

TRUST ME

POST THAT WITH THE  
PICGURE

BRO

POST THAT.. 100K easy

12:03

Signal strength, Wi-Fi, and 35% battery icons

< 106



Rob

Unhelpful

Haha

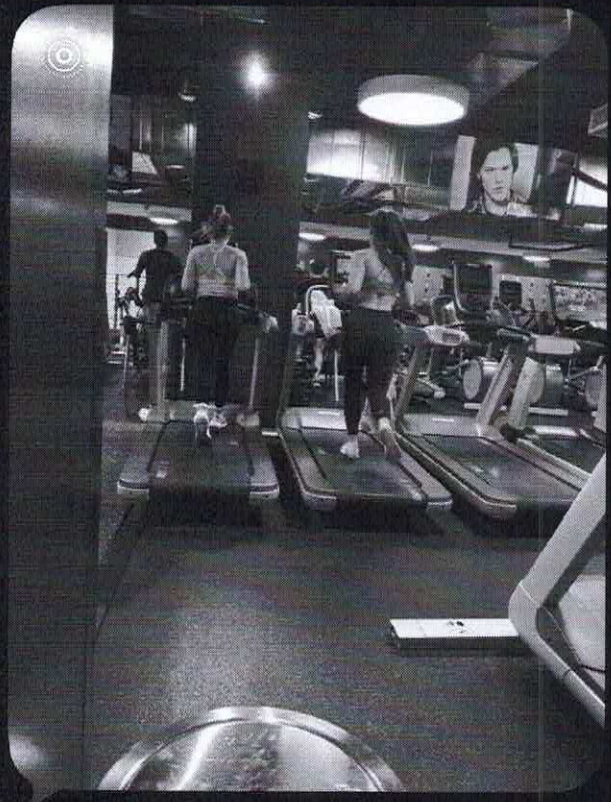
Sleep time

Tired

Apr 2, 2025 at 12:23 PM

Alright I'm giving you a banger

Huh



2 Replies

Post this

Gents... left or right?

< 106



Rob t or right (cheek)

"This chick won't get off her phone, chat thoughts?"

Go

10 million views incoming

How about

Why does this gym always have the weather on tv

Either or



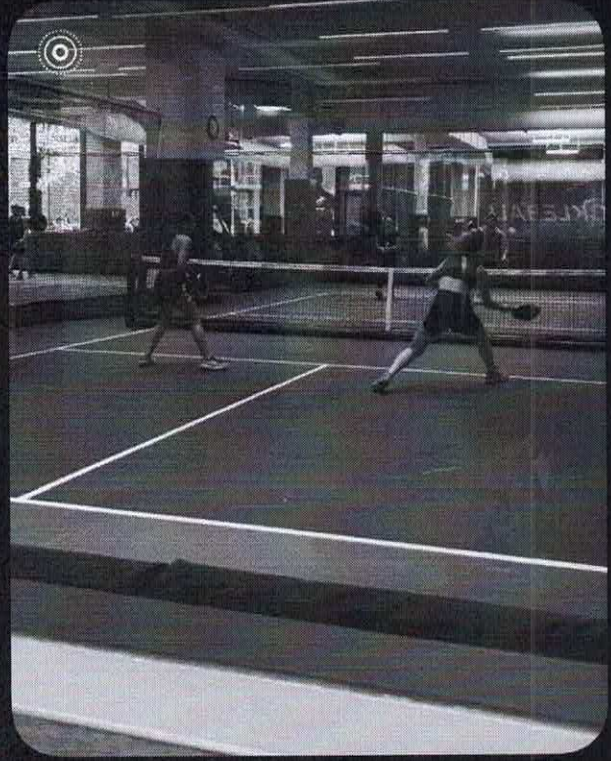
Another one

< 106



Rob

Ok later



Edit background

Bet

Can you see my arm in reflection

Remove that lol

Don't risk that one

Can't dox

Ok

Sad, it's a good one

12:29

29

< 106



Rob



Sometimes I feel bad for seats...  
#AllLivesMatter

Can I post this?

Ya those are google

Both of them

Switch it up. Post a hinge or  
text exchange lol

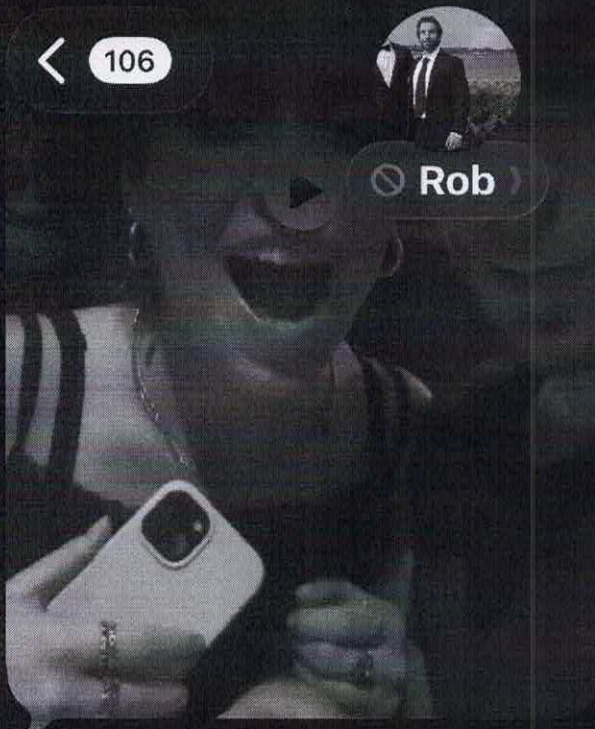
Don't over do it even tho ppl  
like it

Ok

< 106



Rob



Rizz

Smash adap

Asap

In bathroom?

Yes

Lmao

Dude she's retarded

Bro she said she'll do anything but sex lol

Should I still bring her back?

Tweet that^

It's kind of like how you get emails from Pakistani who say do not... sir I am not a scam...



Rob

< 106

(I will)

Hahaha

Bro

How's my Twitter doing

Way more important than this chuz

She left her bat

Bag



Should I low key steal it and leave?

12:15

Signal strength, Wi-Fi, and battery (34%) icons.

< 106



Rob

Lmk

If it doesn't you need to deactivate

Uh



Just post this lmao

"Just gooned to this chick in the gym"



Lmaooooo

Later

< 106



Rob

irger King on 7th

(Ask for José)

Hahaha

- pier 25 (personal)

This is gonna go viral

Send me a pic to put it with just something funny



Just literally put this lol

No one will ever slide past it if they see that



< 106



Rob

PWF

Should my boy delete this tweet he's getting ripped apart [x.com/goonboss\\_/stat...](#)

18:59

Today

forgot to reply. It's deleted when I click on it, what was it?



18:59

No because your account is gone

Need it back

Tweet the Asian trophy

Will do



< 106



Rob

Done

Ok time to double down



Hide faces

Two diff posts?

Yeah lol

Keep posting crazy pics

Captions?

< 106



Vagii **Rob** grotesque man

Can't look at one for more than a few seconds without gagging

**Marvin (@goonboss\_)**  
x.com

Brooo that was my post!

Oh my b

Keep it tho

Nah you got it

Ok

Give me something

NYC neighborhoods as famous rapists

- Murray Hill = Harvey Weinstein
- Fidi = Jeffery Epstein
- East vil = Diddy
- West vil = Dahmer
- Upper west = r kelly
- upper East = Hillary Clinton

LMAO

< 106



Rob

Just post this lmao

"Just gooned to this chick in the gym"



Lmaooooo

Later

Did your card work

Walking over

Dude you need to double.. even Triple down

You gained 200 followers in a day

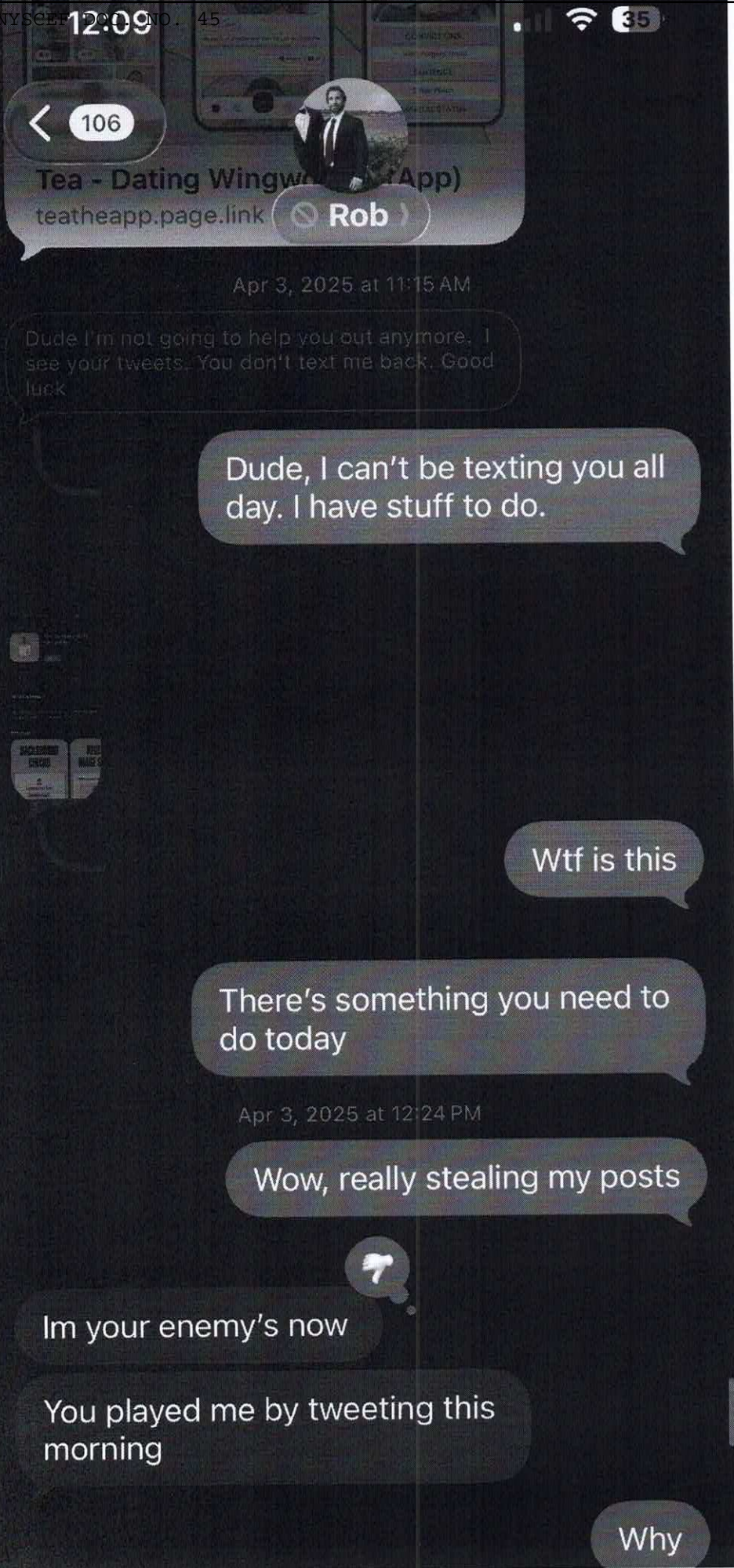
I've never seen that much growth

How??

You grew much faster

Wym how

No I didn't



106

Tea - Dating Wingw... (App)

teatheapp.page.link Rob

Apr 3, 2025 at 11:15 AM

Dude I'm not going to help you out anymore. I see your tweets. You don't text me back. Good luck

Dude, I can't be texting you all day. I have stuff to do.

Wtf is this

There's something you need to do today

Apr 3, 2025 at 12:24 PM

Wow, really stealing my posts



Im your enemy's now

You played me by tweeting this morning

Why

12:11

Signal strength, Wi-Fi, and 35% battery icons

< 106



Rob

Bro, your account is gonna just become a right porn at this point

Delete all the tags

Besides the one dimitri responded to

It looks dumb

What



Idk why it shows it like that

Delete those

And start posting normal stuff again

< 106



Rob

Another one

Bro he'll nahhhh she got her face hahahaha

"Why does every hot chick have a fupa?"

Bro don't be scared

Insanity

Faces work

Nah then I'll get doxxed

I told you

You can't

But fine emoji her face

Post first one

I'll post first if you give me a better caption

Any chick that wears blue pants is a huge whore

< 106



Rob

HA HA

Aunts chest

3rd cousins foot

No need to be rude

im not gonna sit here and roast you even though it'd be so easy, but if thats like what you wake up and do everyday you should probably change that

pathetic

What kind of kitchen aid are you looking for?

definitely a need to be rude, you know exactly what youre doing

???

POST THAT

"Females..."

No way

"She's a real stinker, ain't she"

Or living up to the name

12:28

29



Double date?

She's prob gone

You account is back



I see followers

Nice

Keep tagging James and Dimitri in random shit

< 106



Rob



Anytime I walk around the city I realize mid this city is. Need to move back to Arizona asap.. so many hotter females

There's your post ^

I realize how ^

Tag?

No tag

With her pic?

I'll send it to her

Yes

8:41



< 104



Rob



10:21



Hilarious

That's hilarious

I told you he's my prodigy

He's a virgin

He does whatever I say

He's a virgin?

Jesus Christ

I'm helping the youth

Yes

Oh god

Would you like to be host first?

No wonder he doesn't know how to talk to women

His

Deleted

I'm trolling

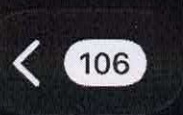
Mar 18, 2025 at 12:55 PM

Why are you talking about me

I don't want to be added

Stop saying that

12:09



Fri **Rob** tryna smash me but not my type

What happens to your haters

Idk

Tweet this...  
"I've never liked basketball, why would I willingly watch black people succeed at something"

Bring them back

Tweet this...  
"I've never liked basketball, why would I willingly watch black people succeed at something  
Why I watch soccer"



**Marvin**  
 STD testing center  
 1.3K followers 214 posts  
 Posted by CSU, BSN, CMAA, CMAA (P)  
 Posts    Replies    Media

**Marvin** **Procrastinator**  
 I'd rather fuck a tranny than a "woman" over 20 lbs.  
 Visibility Limited  
 This post may include NSFW content  
 Tap to expand to view more  
 This content may appear to be altered  
 Tap to view

12:26

Signal strength, Wi-Fi, and 30% battery icons

< 106



Rob

Look at these dai...

Goon god

Who's that fatass

Idk I blocked

All ugly people should live on their own island...except therapists, doctors, teachers, and cleaning ladies.

Those roles should be strictly unattractive. I can't be trying to impress someone while being mentally or physically ill.

Gonna have teachers coming at me ^

Nice

Apr 11, 2025 at 3:12 PM

HA HA

You're too attractive to be single, there's gotta be a catch

Is it the horse obsession?

not obsessed with horses

haven't ridden in years

cuz I know my worth and won't put up with not being treated well

12:06

35

< 106



Rob (oonboss\_)



Dude you went viral

40K

We need more

How many accounts can I go viral

Infinite

You were right about me

You have a gift

When you messaged me I owned the app

But why can't I do this in real life

I saw it in you the moment you crossed my app

You can

How does it feel going viral?

12:33

29

< 106



Rob

Gay



Yo I'm gonna go on PWF podcast!

Amazing

11:02 Messages

Kaan Divitoglu

Hey man,

Big fan of the chaos you bring to the timeline—consistently hilarious and on point. I'm the founder of Laila, a new NYC-based dating app built for people who are tired of "grab drinks?" energy and want to actually post the date they want to go on. Think "I'm seeing a jazz show Thursday, who's down?" instead of "wyd?"

We'd love to sponsor a post (or meme, or whatever fits your voice) and get Laila in front of your audience, who clearly get the mess that is NYC dating.

Let me know if you're open to collabing—happy to share more and talk budget.

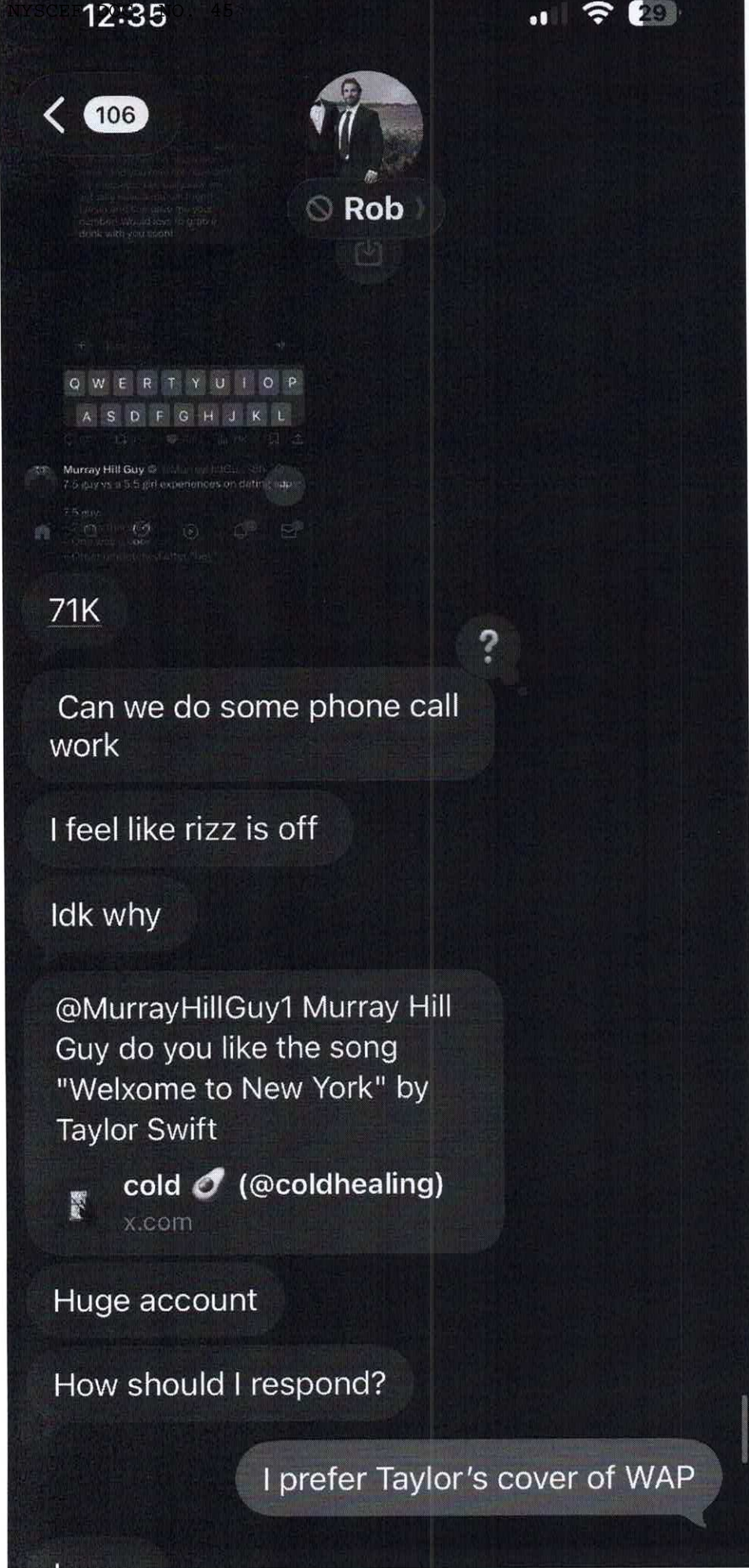
Insta: @laila\_nyc

Cheers, Kaan

Bro

I'm telling you I have a thing going

Trust the process. You can't rush greatness



12:06

35

< 106



Rob

### Recents

Search

- +1 (309) 721-8824  
Rock Island, IL 16:10
- +1 (309) 721-8824 (3)  
Rock Island, IL 16:09
- +1 (310) 313-0402  
Potential Spam 16:04
- +1 (907) 561-5562 (4)  
Potential Spam 15:58

DELETE

ILL EDIT THE PIC

don't show my friend face

Eric

Plz delete

Done

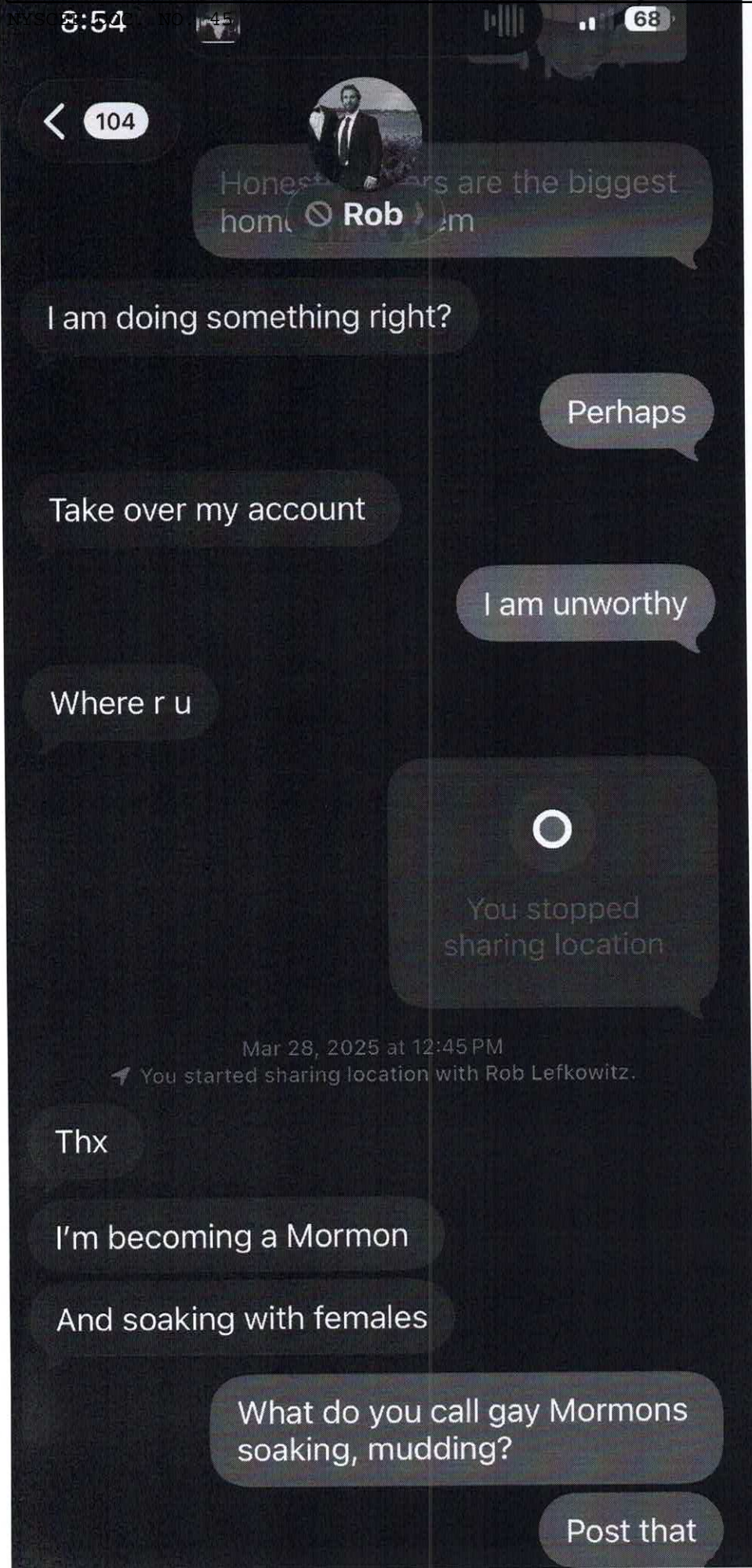
Never, never show faces

Wait

Repost the subway chick

Cause no one saw it





12:39

Signal strength, Wi-Fi, and battery (28%) icons

< 106



Rob

This was the golden era of my account

Should I tweet that again?

Yes

**NYC Situationship Starter Pack**

- Meet on Hinge, run club, or blackout at a bar
- Grab "a quick drink" dangerously close to your apartment
- Go back to your place, put on the weekend
- Nut in 30 seconds (she has an IUD, you asked mid-thrust)
- Text for a few days pretending something might happen
- Never see her again, but like each other's stories for 8 months

Banger?

Good, but not crazy

12:38

Signal strength, Wi-Fi, and battery (28%) icons

< 106



Rob

If a girl calls her boyfriend her "partner," that man drinks iced oat lattes, says "let's circle back" during arguments, and cannot bench 225.

Can guarantee she cheats on him.

Make this more insane ^

Singles only event that we met at last month is at Bella Jun 7:30 PM tonight

Yeah I remember

I'm out I got a flight at 7 am

Next one I'm in

My friend sent me one for next week but it's too pricey

What do you mean I thought this thing was free

2 diff ones

09:53

Signal strength, Wi-Fi, and battery (22%) icons

B

Ben Cohen

Color to lifetime tomorrow the



12:37



< 106



W. Rob Heidi to tell him I said hi

Will call soon

No veo

Bro

Apr 17, 2025 at 8:35 AM

08:35



Heidi

Today

Marvin wanted me to tell you "hi"

Hey Marvin

How's my buddy doing

+ Start a message



123

return

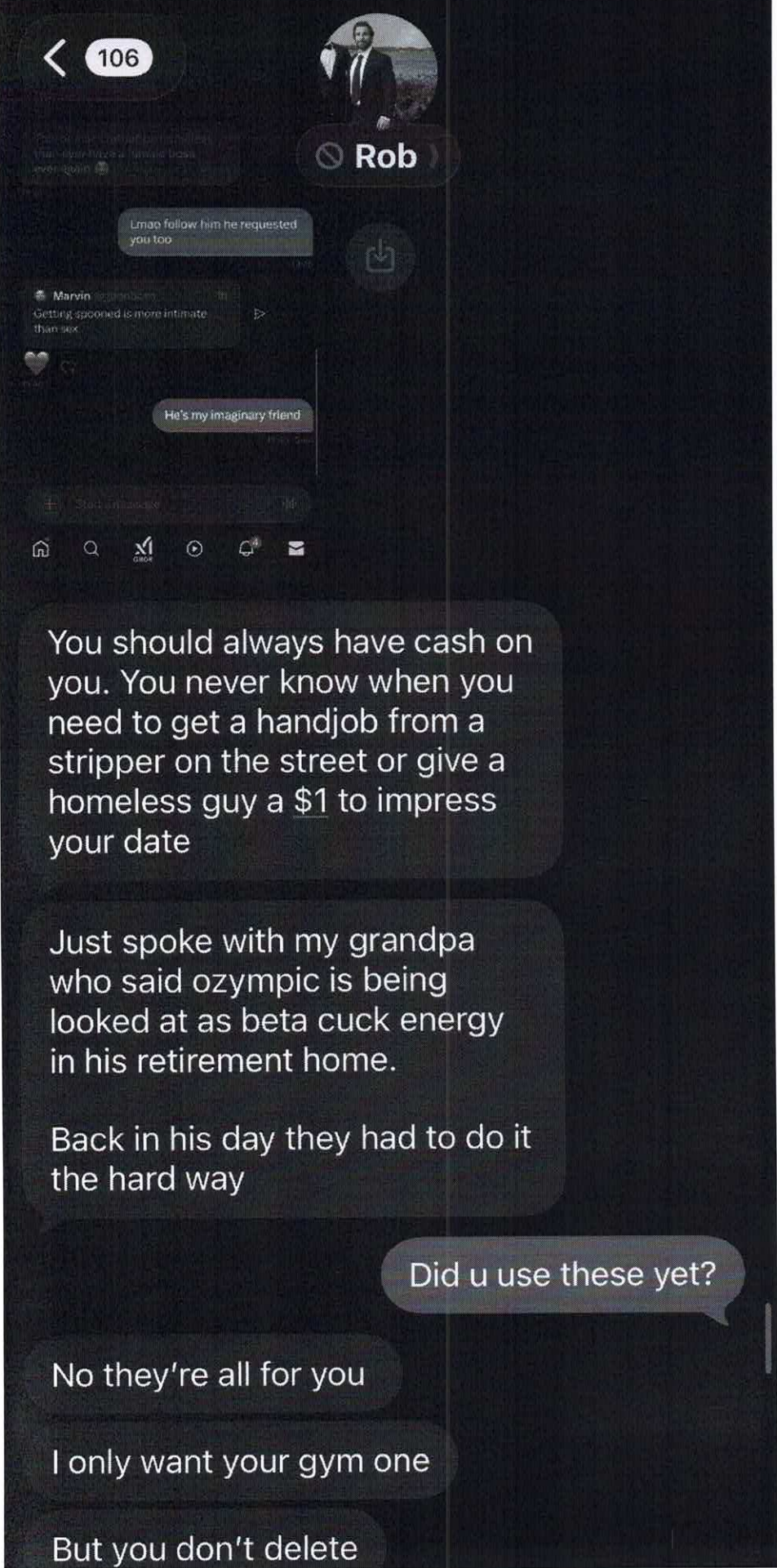
Were you guys dating?

Help me finish this tweet:

If a girl ever mentions her "boyfriend" as her "partner" then...







You should always have cash on you. You never know when you need to get a handjob from a stripper on the street or give a homeless guy a \$1 to impress your date

Just spoke with my grandpa who said ozympic is being looked at as beta cuck energy in his retirement home.

Back in his day they had to do it the hard way

Did u use these yet?

No they're all for you

I only want your gym one

But you don't delete

8:45



70

Hilarious haha

< 104



Bro, I get zero like

Rob

I need to post more stuff like you

But then it wouldn't even be me

I think I'm destined for hyper niche status

You just need 1

Try

True

Nothing more unattractive than a woman with hairy arms

You need to rage bait one chick

Ak?

Hah she's too easy

If you're fat I'm so much fucking better than you



gregory (6'3)  
(@whiteflameee)

x.com

Mar 19, 2025 at 8:11 PM

that's the catch

< 106



Rob

Idk why it shows

Delete those

And start posting normal stuff again

"If my son ever gets a job at Trader Joe's I'm disowning him"

In college I went 30 straight days of having sex with different females.

I haven't had sex since that day as now I'm waiting for the right person.

Any guy who drinks diet soda should literally go get their dick removed and become a female

If you eat at any of these places, do not follow me:

- Panera
- TGI Fridays
- Cava
- Chick fil A
- Taco Bell

(Rage bait ^

Done

12:31

29



Haven't heard from

brought this girl back after a night out, we're both drunk and starving  
 I offer her a granola bar, she's like "yeah sure, lifesaver"  
 she takes one bite and goes "wait... does this have almonds?"  
 I'm like "uh... yeah? it's a KIND bar?"  
 she just stares at me and goes "I'm literally allergic to almonds"  
 I'm apologizing, scrambling for Benadryl, she's rinsing her mouth with White Claw  
 vibe completely dead  
 cockblocked by a \$2 snack bar



- 28 y/o Ivy Finance Girl in NYC Starter Pack:**
- Aritzia uniform + Golden Goose sneakers
  - Hinge bio: "6'0+" + "fluent in sarcasm"
  - Barry's, Bloomberg, breakdown
  - Sweetgreen 3x a week, still "trying to cook more"
  - Dating a finance bro she claims to hate
  - Group chat named "wine &

< 105

Early s... New York starter pack

- Millennial women walking small angry dogs
- "Bro let's play pickleball bro"
- Fat, ugly, shorts-wearing state school frat bros flooding the bars
- Your ex posting engagement pics

Marvin (@goonboss\_)  
x.com

My first starter pack

Dude wtf

You kinda stole my shit

Not at all

Plus you steal my shit all the time lmao

Can't believe you posted that

Probably your best post ever



12:29

Signal strength, Wi-Fi, and battery (29%) icons

Is that me lol

< 106



If **Rob** self-confidence now that I know that the real Murrayhill guy believes in me

1 Reply

I'm not that ugly smh

It's not you

finally have self-confidence now that I know that the real Murrayhill guy believes in me

Tweet that lol

But make sure you tag him and not me

Y

That's funny af

HA HA

Highkey, funny that by most metrics you and I are doing pretty well and they're just so desperate for us to be basement dwelling loser fatty

Edited

It's quite easy to not be fat

rapists



- Murkin = Harvey Weinst
- Fid = Rob Epstein
- East vil = Diddy
- West vil = Dahmer
- Upper west = r kelly
- upper East = Hillary Clinton

LMAO

That's you haha

- Hells Kitchen - Kobe Bryant

That'll be good \*

Should I add him?

Yes

Don't post this

In college my buddies and I had a contest we called The Trifecta

To complete it, you had to fuck a chick on her period, have anal sex, and fuck a black chick

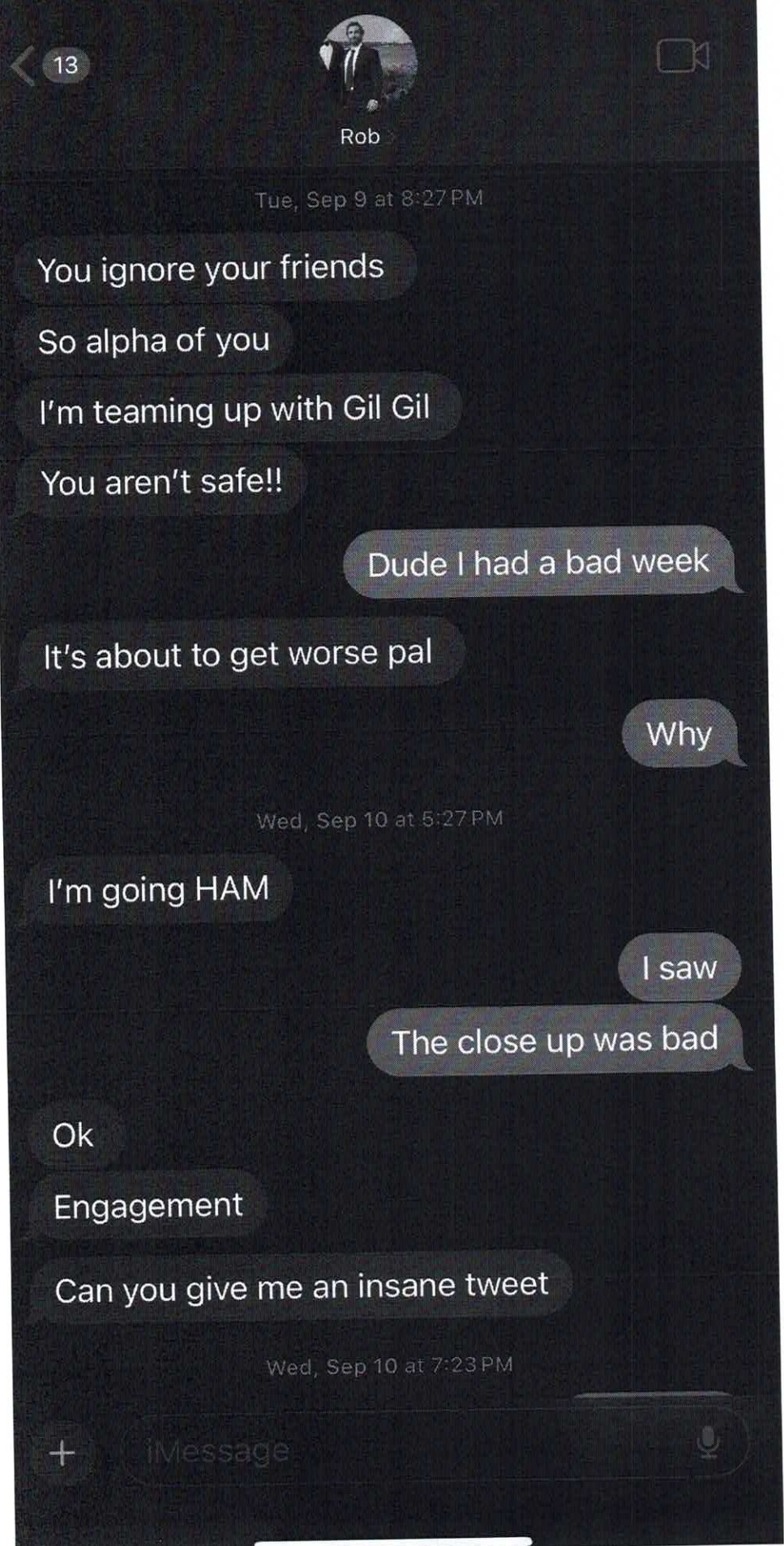
I became an eternal legend when I did all three in one night — with the same girl

Is it good?

11:45



110 of 159



13



Rob

Tue, Sep 9 at 8:27 PM

You ignore your friends

So alpha of you

I'm teaming up with Gil Gil

You aren't safe!!

Dude I had a bad week

It's about to get worse pal

Why

Wed, Sep 10 at 5:27 PM

I'm going HAM

I saw

The close up was bad

Ok

Engagement

Can you give me an insane tweet

Wed, Sep 10 at 7:23 PM

+ iMessage



6:43

98

11



Robby

I'm good man. Dimitri thinks I'm you lol

Until you prove to work with me

You told him it's me??

Why would you do that

You're tough to trust man

I said it's a multi run account

Never used your name

How am I tough to trust? I've literally been by your side more than anyone else in your life.

And you attacked me more than you attack anyone else?

I don't attack you

Dimitri isn't gonna stop tho

What is he saying?

Why is he attacking me?

Delivered

+ iMessage



11

Rob

enemy

You are

You're falsely impersonating me?

But I'll say it to you

No clue

Don't know who is who

I'm Robby

What?

You should probably hire a lawyer

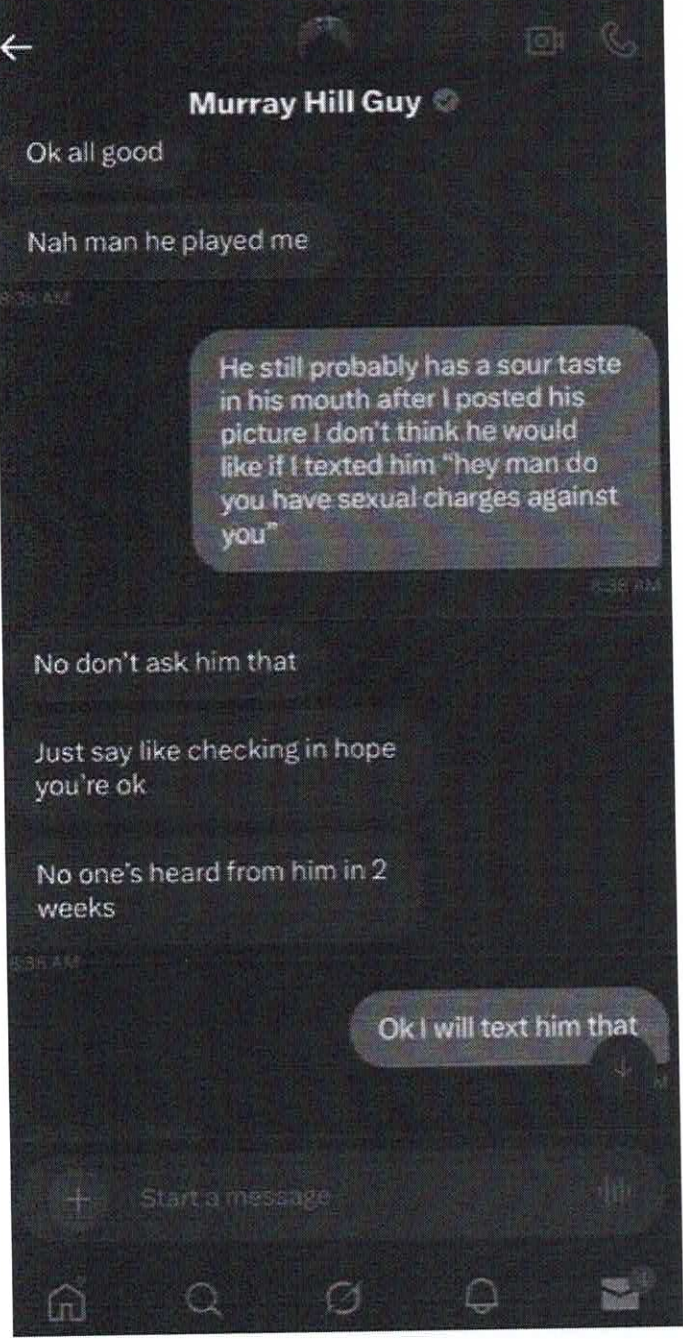
Why?

I did

Just in case anyone comes after me now that I'm big

Why would you want me to go to a party if I'm your enemy?

You are good with women



He still probably has a sour taste in his mouth after I posted his picture I don't think he would like if I texted him "hey man do you have sexual charges against you"

Ok I will text him that

Murray Hill Guy

Ok all good

Nah man he played me

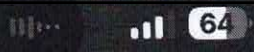
No don't ask him that

Just say like checking in hope you're ok

No one's heard from him in 2 weeks

Start a message

3:08



19



Rob

New Contact Name

Robby Lefko

Update X

Degen coa

Cpa

What's up

On phone with lawyer. Hold on

Yesterday 1:27 PM

Same. My lawyer just told me to tell you not to contact me while they're looking into this stuff, so please don't

Delivered

Ok so you're out for the party tonight?

Today 2:27 PM

Hey pal, I got knuckles. I have all the proof I need. Let me know when your investigation is done and want to be my friend again. He's done though

He will never bother us again.

+ iMessage



8:42



MHG ghost writers

I'm sick of him! Kick him!!



Murray Hill Guy · 4:51 PM

If he emphasizes one more of my messages I'll send his full name to yall

Murray Hill Guy · 4:52 PM

His name is eric

He's private messaging me

But won't speak here

Murray Hill Guy · 4:54 PM

The bit is becoming too much. I might have to kick myself lol

McP · 4:54 PM

It's extremely disrespectful by @goonboss\_ to emphasize all my messages and not say a word



+ Start a message



10:39



Rob

Fri, Sep 12 at 10:42 AM

Nice response bro

you keep attacking me

You don't answer me

If you don't want to speak just say it

Dude you keep stressing me out, I thought you had my back

I work a lot and you attack me for it

I don't have people who don't have my back

So no

I've always had your back. Helped you tweet, helped you when you got doxxed, told you to grow out your hair to become chad, I've helped you with everything

Never even asked for money or anything

+ iMessage



8:34



11



Robby

Why are you always stressing me out

Honestly disrespectful !!

Not at all

Dude wtf

I told you I'm not kidding

Stop

Dude, I work all day

Me too

5:30-4 pm today

Why are you coming at me for no reason

Now you doxxed me

Because it's extremely disrespectful

You were supposed to protect me

I sent your name

+ iMessage

5:32



24




Rob

Live tweeting from the company break room:

3 chicks with industrial-sized fupas shrieking about Taylor + Kelce like it's the moon landing.

I'm just trying to microwave my chicken and rice in peace... do I tell them to lower their BMI or their voices first?



Murray Hill Guy  
(@MurrayHillGuy1)  
x.com

Give me credit

One of my best tweets ever?

Damn bro come on

Tue, Aug 26 at 5:38 PM

Fuk you bro

Not my true homie

I'm working

Ok

+ iMessage 

12:14



4



Rob

I don't understand why you don't ask your manager or something

Yeah hr had me go in

Edited

Don't talk to HR bro

Did they act all weird?

A bit

Lmao you're fine

But what are you doing today. Park at 3

Literally so many beautiful women

I got zero sleep. I'll be there if I'm awake

Lmao congrats on the sex bro

No dude

Incredible

I thought I was gonna get canned today

+ iMessage



8:34



11



Robby

Why are you coming at me for no reason

Now you doxxed me

Because it's extremely disrespectful

You were supposed to protect me

I sent your name

The. Day that

Say

Dude, you were supposed to be the one person I could always count on

Why are you mad at me?

I just did

Because you emphasized like 20 of my messages!

It's crazy!

That was a compliment

I can't believe you would reveal my

+ iMessage



8:34



11



Robby



What up

Tranny post sucks

You don't speak

Kicking you and doxxing you in that chat lol

Because you're disrespectful to me

Sorry pal

What's going on

You keep emphasizing my messages and not speaking

Very disrespectful

Dude you're being weird

Ok word

Don't threaten me

I'm supposed to be your friend

I don't like group chats



iMessage



8:35



11



Robby

always.

Sending a picture of you in like an hour when I'm home from park

Just tell me then

For not speaking

Wtf

What do you want from me

But it's gonna be after he kicks you

I hate being in Twitter group chats

To speak bro

These guys think you're a chad

Then stop doing this

Dude, you're scaring me

I want you say in the king

I'm



11:45

86



Yeah, cause you're mad at me or something

You haven't said a single word to me!

Every friend I know has said great job, etc

You and Levi disappeared

I'm not mad

Every time we talk, you say something mean to me so we don't talk anymore

Gotchya

I think you're mean for not reaching out when your boy makes it big. After how much I believed in you

To each their own tho!!

Fri, Sep 12 at 10:42 AM

Nice response bro

you keep attacking me

10:39

58



Rob

Ok and where are you now that I'm growing?

Everything you just mentioned is the past

That's my point. You just ignore what I've done for you and always ask for more. You don't appreciate my friendship

Got it

Then I guess we cut it here. Thank you for the past

Appreciate your help. I hope you appreciate mine making you into someone. Good luck

I will say. You will lose a lot of close people in your life acting the way you do. Do better for the people who care for you!!

Thank you

Hope you hit 50k today

Don't worry about it

+ iMessage

10:39

58

125 of 159

5



Rob

Thank you

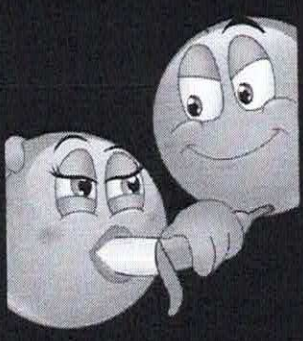
Hope you hit 50k today

Don't worry about it

You are also an enemey and will face a dox going forward I will take you down and everything you stand for!!

No one does me wrong. No one

Sat, Sep 13 at 2:53 PM



Sat, Sep 13 at 4:07 PM

People want content bro. Like live video stuff

Are you in and wearing your Meta glasses?

+ iMessage



4:30

67



Rob

- Mandy commented: As a girl, I'm not taking a last minute date thur- sat 20m
- s.hndrx commented: it's called working a lot of jobs don't have people working on Sundays 43m
- Capi commented: If Murray hill guys has no haters I am dead 46m
- inmiasopinion commented: it's the one time I have nothing to do and finally am bored enough to respond 46m
- IrisWest commented: Work! People are WORKING 47m
- haile.yy.y commented: Statistically, dating apps are used more by EVERYONE early in the week and useage tapers off by friday-saturday because everyone is trying to secure dates for... 53m
- colin.in.clt commented: I mean you are in nyc. Once you move to a more long term city people become way more serious 54m

Tik Tok going strong

Why don't you answer?

I said you were being disrespectful and then you laughed at me. This is not something a friend does.

Sounds good bro

When you get over it lmk I'm here

If not, enjoy your life. You will continue to lose friends in your life.. and good ones

+ iMessage

← rory g 630 posts

Posts Replies Videos Photos

**Auquan AI** @auquan\_ · 5/1/25  
We are excited to welcome Eric Spector to the Auquan team as our new Deployment & Outcome Analyst, based in New York!  
#Alagents #FinTech #AlinFinance  
#FinancialServices #TeamAuquan #NewHire

**AUQUAN**  
welcomes



**Eric Spector**  
Deployment & Outcome Analyst

4 1 2.2K

**rory g** @gillgillmarcs · 16h  
This guy fucked my girlfriend. He treated her with disrespect

2 97

**New Balance 993** @new\_balance\_993 · 1d  
Murray Hill Guy really tweets shit like “they’re called leggings ladies, not stomachings” and gets like 5k likes

3 3 422 22K

**rory g** @gillgillmarcs · 16h  
He’s a 5 foot Jew who ra8es underage women

Home Search Activity Alerts

rory g @gillgillmarcs · 16h

9:36

264

11



Robby

What?

Moving to Scottsdale

Would u be my roommate

If I ever theoretically go then sure

Fuk you job in nyc

We move here and craft bangers all day and get brand deals

Post your face more and launch your business



If you find a way for me to make money and not need my job, then sure

I need you all in

I'll tell JE to doxx you again

Dude, this is your account not mine

+ iMessage

10:37

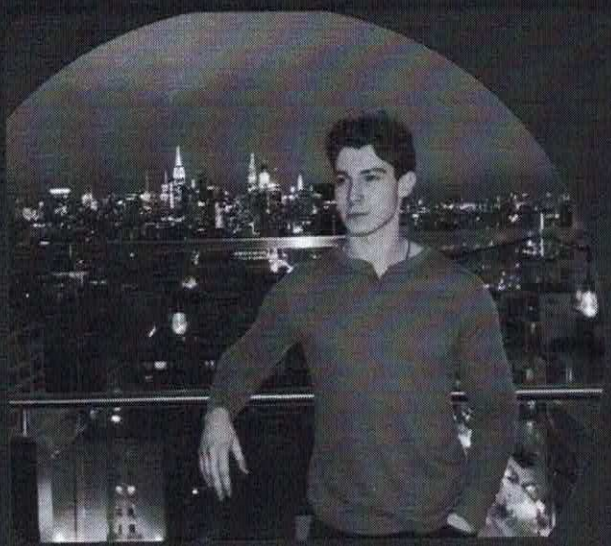
100



Fran

Fran @gillgillmarcs 10h  
#DOXMURRAYHILLGUY

ERIC SPECTOR



Show this thread

Bro dox him

I am going to call his job if he doesn't answer me

Help me



10:16 AM

+ Start a message



10:39



Rob

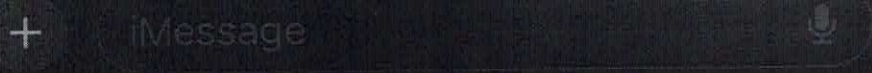


Eric Spector runs the Murray Hill Guy account. He's a confirmed creep and has r\*\*\* charges on him by several females.

@auquan\_ @pigshitsonballs  
@MurrayHillGuy1 @BuffChickenS...

 **Chucky (@Chucky365787)**  
x.com

Good luck. I'm not helping



Murray Hill Guy 4.2K posts

Posts Replies Subs Highlights Videos Photos

Murray Hill Guy @MurrayHillGuy1 · 8m Why are all Jewish women so horny all the time?

Murray Hill Guy @MurrayHillGu... · 2h Bitches can't resist an alpha male... Murray Hill Fitness coming soon



30 162 37K

Murray Hill Guy @MurrayHillGuy1 · 2h I've got 48k followers now and somehow get the same exact engagement I did when I had 500.

This app makes zero sense... but maybe that's why it's the best.

12:56

100

11



Robby

Privacy concerns



- Tag people
- Add location

MHG is gonna post this he said

Do not do that

Goodbye

Good?

I'm at the park

Don't post that

+ iMessage

11:45

86

13



Rob

Even as we aren't friends anymore I will always speak highly of you. I believe in you and know you'll be successful in whatever you decide

I truly hope you don't waste your life sitting at a desk. You have a talent that no one else has in the city. Use it.. DO not waste your life away man

You turned into levy. You're jealous and you disappear

Dude, I don't know what you're talking about

I appreciate the kind words

We aren't friends anymore

Look how much I've blown up

Yeah, cause you're mad at me or something

You haven't said a single word to me!

+ iMessage

12:14



6



Rob

Lol

I'm honestly so jealous of you

This is your peak

Dude my life sucks

You're about to be a millionaire

You only see the good parts and extrapolate

Who bangs any chick he wants

That's literally Christian



I am a fat loser

Christian is 33 years old and works at a college bar lol

Lmao

You can do that too

He's living the life

+ iMessage



12:34

5G 84



New Contact Name

Robby Lefko

Update X

was in touch earlier this yr about a possible profile. He's doing another story right now, so I'm picking up the slack-- and wondering if you'd be game. I've been following you for a little while and getting a kick out of your dating/politics tweets. I think that now would be the perfect time to "unmask," and come out on top after that weird guy doxxed you this week. My thinking: your name is out there now, and the world wants to meet the real MHG/Robby. What do you think?



You accepted the request

Should I post you

Is that the only way you answer me

Sad

I'm on the train. Stop threatening me.

Delivered

Fuck you

I'm posting it

+ iMessage



1:38 11m

88

17



Robby

Just deny the doxxers

Say there's more of you

Lupe Gordon - 09/41

I do lol I just don't want wr seeing

This account is run by 3 Jewish guys, 4 Indian men, 2 beautiful mids, and 1 intern.

You never know who is posting what...



**Murray Hill Guy**  
(@MurrayHillGuy1)  
x.com

Today 1:32 PM

You're ignoring again

Should I post you?

Don't threaten me again

I'm calling people

Delivered

Ok I will just post. Sorry

Won't again

+ iMessage

12:10

89%



ldk

But caption that and be like zoom in on this bitches

Something like that

But cleaner

Damn



Just know I don't like when you ignore. And don't say you're busy because you answered the group chat in 10 seconds when Nick and Chris text.

You can apologize tho

Ok bro. When I did this you ghosted me for a week. I'll do the same. Have a fun weekend with the avengers

You will never keep any relationship or friendship acting that way

You won't answer this because you truly have zero feelings in your life or care for any one. That hurt

+ iMessage

12:10

89%

3



Robby

But all I ask for is respect

You're being rude. I'm working.

I can't text you all the time

I knew you would say that. You answered the group chat in 15 seconds.

Dude, you text me every five minutes

You need to calm down you take things too seriously

You're lucky that your work allows you to be creative and free. I have to be on a desk and actually deal with project.

Have you ever considered how much stress you give me?

Delivered

Good one man. Drop the alpha bit for once in your life and be a person

When you want to apologize I'll be here. Until then carry on

+ iMessage



Robby



You won't answer this because you truly have zero feelings in your life or care for any one. That hurt me. You're not coming to my bday if you act like that. And also don't talk to my friends aka the avengers. Just know you hurt me and o know you don't give a shit but live your life but keep me out of it and do not contact my friends either and I won't contact yours. Do not speak in the chat. Thank you

What's going on with you today

You pissed me off dude. You did the same shit I did "liked a message" I get it now. It's disrespectful. I said sorry. You just did it back to me

You don't care about me it's pretty obvious. Just don't toy me around

But all I ask for is respect

You're being rude. I'm working.

I can't text you all the time



iMessage



5:08



19



Rob

I'm good man

You keep doing you. You're crushing it. I have no doubts. Just stay away from me and my friends. Respect that

Do not contact Nick or Chris or Levi going forward. Or I will message Gill Gill and work with him. That's a threat. You're a robotic freak who has no feelings

Unblocked him

Tue, Jul 15 at 3:24 PM

What would you say are your top 5 fav bars in nyc?



Phebes

Edited

Wed, Jul 16 at 11:04 AM



Date went really well last night

Invited her to my bday maybe



+ iMessage



5:31



Ok

Sat, Aug 23 at 9:52 PM

Wya

I'll remember this my man



Gil Gil revenge

Sun, Aug 24 at 1:15 AM

Had notifications off

Was with CS

Nobody out tn

Sun, Aug 24 at 8:32 AM



12:09



106



 **Rob** 

Dude I'm not going to help you out anymore. I see your tweets. You don't text me back. Good luck

1 Reply

5:08



19



Rob

ldk

But caption that and be like zoom in on this bitches

Something like that

But cleaner

Damn

Just know I don't like when you ignore. And don't say you're busy because you answered the group chat in 10 seconds when Nick and Chris text.

You can apologize tho

Ok bro. When I did this you ghosted me for a week. I'll do the same. Have a fun weekend with the avengers

You will never keep any relationship or friendship acting that way

You won't answer this because you truly have zero feelings in your life or care for any one. That hurt me. You're not coming to my bday



+ iMessage



5:25  
Messages

98%

← Post ...

 **Chucky**  
@Chucky365787

X.com

Eric Spector runs the Murray Hill Guy account. He's a confirmed creep and has r\*\*\* charges on him by several females.

@auquan\_ @pigshitsonballs @MurrayHillGuy1 @BuffChickenSub



 Post your reply

Home Search Refresh Notifications Messages

← rory g 634 posts

Posts Replies Videos Photos



rory g @gillgillmarcs · 23m  
Don't think I forgot about you Jew boy.

Eric Spector: confirmed sex offender

**A** Auquan AI @auquan\_ · 5/1/25  
We are excited to welcome Eric Spector to the Auquan team as our new Deployment & Outcome Analyst, based in New York!  
#Aagents #FinTech #AlinFinance  
#FinancialServices #TeamAuquan  
#NewHire

AUQUAN  
welcomes



**Eric Spector**  
Deployment & Outcome Analyst



rory g @gillgillmarcs · 10h  
Awww look who decided to go away! Clowns  
#shrink

ho Drinko  
62 members

Chucky  
10 posts

Follow

146 of 159  
RECEIVED NYSCEF 04/29/2026

Posts Replies Videos Photos

**Chucky** @Chucky365787 · 19m  
He harass young women  
121

**Auquan AI** @auquan\_ · 5/1/25  
We are excited to welcome Eric Spector to the Auquan team as our new Deployment & Outcome Analyst, based in New York!  
#Alagents #FinTech #AlinFinance  
#FinancialServices #TeamAuquan #NewHire

**AUQUAN**  
welcomes



**Eric Spector**  
Deployment & Outcome Analyst

4 1 1 2.6K

**Chucky** @Chucky365787 · 11h  
RaPist  
1 18

Chucky reposted

**A** **Auquan AI** @auquan\_ · 5/1/25  
We are excited to welcome Eric Spector to the Auquan team as our new Deployment & Outcome Analyst, based in New York!  
#Alagents #FinTech #AlinFinance  
#FinancialServices #TeamAuquan #NewHire





Rob

saw something different but I guess they were right.

Sat, Jun 28 at 8:33 AM



Please do not message or contact me again. I have reported your posts to the police. You will also be hearing from my lawyer

Today at 8:20

Hello, don't even bother responding as your number is blocked.

This is your formal warning: If you don't immediately remove all posts, TikToks, instagrams, podcasts, and any other content featuring me or my messages, I will take further steps.

The viral exposure is ruining my mental health, damaging my reputation, and making daily life unbearable.

I'm done being dragged into this for anyone's entertainment.

You have 24 hours to fix this before I escalate.

8:20

MESSAGE

You're a bad friend but you've helped

What should I do??

In your expert opinion!!

You will be involved if I go down!



iMessage



4:35



48 of 159

< 18



Rob



Thanks man

I'm still that guy don't worry



It's just a brand now

I heard you spoke with Chris

Just got off the phone we should hang



In the leader of the group. I'd like to know if you're talking and hanging with them

Yeah you didn't call me

I'm

Do not go against me.

What are you talking about

You should call me before anyone else

2:36



< 11



Rob

Lmao James has met me

Do you think Mark would help me because he's a lawyer right?

Correct

James said ignore

I think I'm gonna file a police report would you wanna come with me to the station?

No I'm not involved

Plz don't involve me!

If there's a police report, I'll have to

Unless you have other ideas

They call you a bad tipper they call me a rapist

Do not involve me. I can give you help that's all

I sold my account weeks ago. I'm not involved online

+ iMessage

9:36

25%

11



Robby

Fair

Fuk Rachel she's done

I can go better

Self dox?

What's going on, man?

She just never answered

Why are you being annoying  
dude? Let her have a nice Friday.

Word

Apologize tomorrow for bothering  
her and then make a joke to reel  
her back in just say something  
about how you're stressed but you  
really are excited

You push people away a lot. You  
need to change that.

Recognizing your pettiness and  
jealousy is the first step but now  
you need to eliminate it

I want to control her



iMessage



9:36

25%

11



Robby

Apologize tomorrow for bothering her and then make a joke to reel her back in just say something about how you're stressed but you really are excited

You push people away a lot. You need to change that.

Recognizing your pettiness and jealousy is the first step but now you need to eliminate it

I want to control her

You're becoming arrogant

Good

I own her

Not good

She will listen to what I say

Or she will be cancelled

This is a bad mindset

You're either with me or you're not



iMessage



8:40



< 104



Rob

Tweet this

"Why do the Jews get two halloweens? #Purim"

All yours

"Why do the Jews get two halloweens? Are they that ugly? #Purim"

I can't

I'm Jewish

Mar 17, 2025 at 8:31 AM

I'd rather be a terrorist than get friend zoned by a woman

Mar 17, 2025 at 11:38 AM

Hmm

< 106



Rob

I know I got

Wait

No way you got it?

Good now ppl won't think its me lol

John Bummit follows me

Why not

Can't have 2 blue checks

Wym

Like per person

Then I'm getting rid of it

I can't have 2 blue check accounts

Why?

It will prove I'm not you!

You're growing more

Double down. Gym chicks

11:59

Signal strength, Wi-Fi, and battery (35%) icons

< 106



Rob

Delete what

This guy is keeping you up  
At 3 am

Back in New York today — gotta  
adjust back to normal time fml

Anymore death threats?

I get like 10 a day

Not yet

Welcome to the game pal

Do you really want this?

Idk

Don't want to get doxxed

Ok lmk

We can Nuke

You only will if you tell a woman  
who you are

I did that when I had 10  
followers

12:04



< 106



Rob

Silly girl is hot

Watch you're about to blow up

Double down

"Why does every chick in my office have a FUPA? Is it required to have one?"

POST NOW

this is your moment

Done

"I have a dream... to bang one black chick in my lifetime"

You literally have a shot to become viral

I'm gonna get in trouble dude

That picture is mine

They're going to look at camera's ?

Fuk

Delete

< 106



Rob

ldk

Don't want to get doxxed

Ok lmk

We can Nuke

You only will if you tell a woman who you are

I did that when I had 10 followers

Facts

Mistake

Tweet that^

The only way you can get doxxed on this app is if you tell a woman who you are

Banger

Posted

Give me ideas

Check my tweets

< 106



Rob

tdk

You've gone too viral lol

Are you scared lol

Well, you're scaring me right now

There's so many death threats

And crunch thinks the account is me lol

Lmao

What if they kill me

You got 400K

That's like \$20 lol

You getting paid yet?

Don't think so

I think you need 500 followers

You're almost there

500 premium followers

12:41



< 106



Rob

So I tell them to come to myc to visit

Got a few IG's

I can get fired doing this tho lol

Fired from what?

I wanna get nasm certified



My job lol

Oh

Why

Like if they company to my company

Guy was a creep at the station lol

I'm not tho

Just say get my insta

But you know how women are

They'll claim rape if they want to

12:16

34

Thanks for the comm...  
huge fan. Btw, all my pics are  
screenshots of YT/tt vids, stuff  
they themselves have posted  
online



Rob

< 106

To who?

John Bummit

Where?

Dm

Yes

He's cool he likes me

Best places to get raped in  
NYC:  
- Hells Kitchen  
-

Holy shit

Yeah go wild

I'm the idea master

- my boss's office

- the Spaniard

- Jewish parties



THE ASSEMBLY  
STATE OF NEW YORK  
ALBANY

CHAIR  
WAYS & MEANS COMMITTEE

COMMITTEE  
Rules

HELENE E. WEINSTEIN  
Assemblywoman 41<sup>ST</sup> District  
Kings County

September 23, 2020

Governor Andrew Cuomo  
State Capitol – 2<sup>nd</sup> Floor  
Albany, New York 12224

**RE: A.5991-A/S.52-A**

Dear Governor Cuomo:

I write as Assembly sponsor of A.5991-A/S.52-A, which has passed both houses and is awaiting transmittal to your office for consideration.

This bill updates and modernizes New York's Anti-SLAPP law (Strategic Lawsuits Against Public Participation, Ch. 767, L.1992) by expanding the breadth of the law and also putting teeth into it so as to deter these lawsuits from being brought.

In recent years, we have seen a growth – in New York and nationwide – in these types of lawsuits, which are brought with one goal in mind: to stifle the free expression of ideas and/or criticism. These lawsuits are not brought to vindicate any particular right - instead, they are brought so as to cause those sued to incur significant litigation costs, and to deter others from speaking out for fear of being similarly sued.

Unfortunately, New York's anti-SLAPP law has proven inadequate to stem the rising tide of these lawsuits, due to its limited scope and also due an important procedural aspect, both of which I shall discuss below.

The bill protects free speech and the free discussion of ideas in two important ways:

First and most importantly, the bill expands the type of speech that is protected by New York's anti-SLAPP law. Given that the statute is in derogation of the common law, the courts have construed the law quite narrowly, e.g. *Hariri v. Amper*, 51 AD 3d 146, 151 (1<sup>st</sup> Dept 2008). Thus, the current statute has been strictly limited to cases initiated by persons or business entities that are embroiled in controversies over a *public application or permit*, typically in a real estate development situation. Meanwhile, many SLAPP lawsuits are filed each year that are calculated solely to silence free speech and public participation, which do not specifically arise in the context of the public "permit" process. By broadening the definition of an "action involving public petition and participation," this amendment to Section 76-a of the Civil Rights Law will better advance the purposes that the Legislature originally identified in enacting New York's anti-SLAPP law in 1992. This is done in the

Page Two - Letter to the Honorable Andrew Cuomo, Governor

bill by broadly widening the ambit of the law to include matters of "public interest", which is to be broadly construed, e.g. anything other than a "purely private matter".

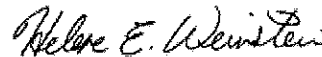
Second, the bill *requires* – rather than merely *allows* - an award of attorney's fees if the Court finds that the lawsuit was brought to silence free speech. Specifically, the Appellate Division, Second Department has noted the non-mandatory aspect of the anti-SLAPP law as concerns the awarding of attorney's fees, and found no abuse of discretion in the lower court's failure to award same, a high standard to overcome to be sure. *Matter of West Branch Conservation Ass'n, Inc. v. Planning Board of the Town of Clarkstown*, 222 AD 2d 513 (2<sup>nd</sup> Dept 1995).

I should also note that the enactment of mandatory attorney's fees in SLAPP actions for New York would be consistent with statutes enacted in a growing number of states, e.g. California, Nevada, Florida, Louisiana, and Texas, to name but a few.

Finally, I wish to respectfully note that for many years I have fought numerous efforts made to "bar the courthouse door" or otherwise chill or make it more difficult for New York's citizens to seek judicial intervention. I remain committed to my view that free access to the courts must remain sacrosanct. This bill, however, deals with a very tiny but growing subclass of civil litigation, where lawsuits are not brought to win on the merits, but are brought to harass, injure, and deter free speech and expression by the defendant and others.

It is therefore respectfully hoped that these important changes to New York's anti-SLAPP law will meet with your approval and be enacted into law. I thank you for your consideration.

Sincerely,



Helene E. Weinstein, Chair  
Assembly Ways and Means Committee

cc: Elizabeth Garvey, Esq.  
Denise Gagnon

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

-----X

ERIC SPECTOR,

*Plaintiff,*

-against-

ROBERT LEFKOWITZ, JOHN DOE, AND  
JANE DOE

*Defendants.*

-----X

Index No.: 150234/2026

AFFIRMATION OF JEFF  
MENT IN SUPPORT OF  
OPPOSITION TO MOTION  
TO DISMISS

STATE OF CONNECTICUT )

) ss:

COUNTY OF FAIRFIELD )

I, JEFFERY L. MENT, an attorney duly admitted to practice before the courts of the State of New York, affirm the following to be true under the penalties of perjury pursuant to CPLR 2106:

1. I am an attorney with The Ment Law Group, P.C., counsel for Plaintiff Eric Spector in the above-captioned matter. I submit this Affirmation in opposition to Defendant Robert Lefkowitz’s motion to dismiss.
2. I am fully familiar with the facts and procedural history of this action based upon my review of the pleadings, the exhibits annexed thereto, the motion papers submitted by Defendant, and my communications with Plaintiff.
3. This action arises not from protected public participation, but from a private retaliatory campaign in which Defendant Lefkowitz threatened Plaintiff, doxxed him, falsely identified him as the person behind the “Murray Hill Guy” account, and either directly made or acted in concert with others to publish false accusations portraying Plaintiff as a rapist, sex offender, and sexual predator, including accusations directed to Plaintiff’s employer.
4. On or about January 16, 2026, Plaintiff commenced this action by filing the Summons and Complaint.
5. Thereafter, Defendant Lefkowitz moved to dismiss pursuant to CPLR 3211(a)(1), 3211(a)(7), and 3211(g), arguing, among other things, that Plaintiff’s claims are barred by New York’s anti-SLAPP statute, that the challenged statements are nonactionable opinion or hyperbole, that Plaintiff failed to plead defamation with the requisite specificity, and that the remaining tort claims are duplicative or otherwise deficient. See NYSCEF Doc. Nos. 12 and 13.

6. Defendant's motion rests on a fundamentally misleading premise. Rather than addressing the pleaded facts as true, as required on a motion to dismiss, Defendant seeks to distract the Court with inflammatory and decontextualized social-media posts in an effort to suggest that Plaintiff somehow "deserved" to be targeted, doxxed, falsely branded a rapist and sex offender, and professionally harmed.
7. That is not a legal defense. Nor is it a proper basis to dismiss a complaint that pleads detailed facts, specific defamatory statements, actual malice, publication, falsity, and resulting harm.
8. As set forth in the Amended Complaint, Plaintiff and Lefkowitz developed a friendship and communicated extensively about social media, virality, account growth, anonymity, and the creation of provocative online content. During that time, Lefkowitz encouraged Plaintiff to post inflammatory material so that Lefkowitz could test such content through Plaintiff, shield himself from direct exposure, and preserve leverage over Plaintiff.
9. The relationship later deteriorated. As alleged, Lefkowitz became resentful and hostile, repeatedly accusing Plaintiff of ignoring him and betraying him, and explicitly threatening to "doxx" Plaintiff.
10. The Amended Complaint quotes, inter alia, Lefkowitz's statements: "I'll tell JE to doxx you"; "you aren't safe!"; "it's about to get worse pal"; and "you are also an enemy and will face a dox going forward I will take you down and everything you stand for!! No one does me wrong. No one." The Amended Complaint further alleges that Lefkowitz admitted, "I sent your name," boasted about "kicking you and doxxing you in that chat," threatened to circulate Plaintiff's photograph, and later sent Plaintiff a screenshot falsely accusing him of being a "confirmed creep" with sexual "charges," followed by the taunting message: "Good luck. I'm not helping."
11. The Amended Complaint further alleges that Lefkowitz falsely identified Plaintiff as the person behind the "Murray Hill Guy" account and used that false identification as the basis for attributing predatory and sexually improper conduct to Plaintiff.
12. The employer-directed nature of the campaign is particularly significant. Plaintiff alleges that, on May 1, 2025, Auquan AI publicly announced Plaintiff's employment on X, and that accounts alleged to be operated by, controlled by, or acting in concert with Lefkowitz then replied beneath that hiring announcement that Plaintiff was a "confirmed sex offender" and a "RaPist," and further posted that "Eric Spector runs the Murray Hill Guy account" and "he's a confirmed creep and has r— charges on him by several females."
13. Those allegations are not vague. They are not abstract. They are not protected commentary on a public issue. They are specific factual accusations of criminal sexual misconduct, directed at Plaintiff's employer and the public, and are alleged to be false.

14. Defendant's own motion papers confirm the themes of the defense: that X is a public forum, that accusations of sexual misconduct are matters of public concern, that the statements are purportedly mere invective or Twitter vernacular, and that Plaintiff supposedly cannot plead actual malice. See generally NYSCEF Doc. No. 12.
15. But Plaintiff's claims do not arise from good-faith public participation. They arise from a private falling-out that escalated into threats, doxxing, false criminal accusations, employer-directed sabotage, and taunting messages sent directly to Plaintiff while the campaign was unfolding.
16. The Amended Complaint also alleges facts giving rise to a strong inference of actual malice. Among other things, Plaintiff alleges that Lefkowitz had insider knowledge of the "Murray Hill Guy" ecosystem while simultaneously knowing that Plaintiff maintained a separate online persona, "Marvin" / "@goonboss\_," thus giving Lefkowitz reason to know, or at minimum recklessly disregard, the falsity of publicly identifying Plaintiff as "Murray Hill Guy" and then attributing criminal sexual misconduct to him on that basis.
17. Plaintiff further alleges that, following the employer-directed accusations, his employer commenced scrutiny and investigation, and Plaintiff was ultimately terminated "due to recent events," despite having been in good standing.
18. Defendant's motion repeatedly attempts to avoid these pleaded facts by recasting them as mere online insults, by relying on screenshots and character attacks extrinsic to the complaint, and by asking the Court to draw inferences in Defendant's favor rather than Plaintiff's.
19. That is not the governing standard. On a motion under CPLR 3211(a)(7), the Court must accept the complaint's factual allegations as true, accord Plaintiff the benefit of every favorable inference, and determine only whether the pleaded facts fit within any cognizable legal theory.
20. Nor does CPLR 3211(g) rescue Defendant's motion. Even if the Court were to conclude that Defendant met his threshold burden under the anti-SLAPP statute, Plaintiff has demonstrated that his claims possess a substantial basis in law and that the challenged communications were made with actual malice.
21. Defendant also incorrectly suggests in his memorandum of law that Plaintiff must establish his claims by "clear and convincing evidence" at this stage. That is not the standard under CPLR 3211(g), which instead requires Plaintiff to demonstrate a substantial basis in law. Defendant's effort to impose a higher burden at the pleading stage is contrary to the governing case law.
22. In short, the Amended Complaint alleges a coherent and highly plausible narrative of private retaliation, doxxing, false criminal accusations, and employer-directed

defamation. The motion to dismiss does not negate those allegations as a matter of law. Rather, it confirms why discovery is warranted and why the claims should proceed.

23. For all of these reasons, and for the reasons set forth more fully in Plaintiff's accompanying Memorandum of Law, Defendant Lefkowitz's motion to dismiss should be denied in its entirety.

I affirm this 29<sup>th</sup> day of April 2026, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, except as to matters alleged upon information and belief, and as to those matters I believe them to be true.



Jeffery. L. Ment