

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

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ERIC SPECTOR,

Plaintiff,

VERIFIED COMPLAINT
Index No.:

-against-

ROBERT LEFKOWITZ, JOHN DOE, AND
JANE DOE

Defendants.

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Plaintiff, as and for his Verified Complaint, by and through her undersigned attorneys, The
Ment Law Group, P.C., alleges as follows:

PARTIES:

1. At all relevant times herein, Plaintiff Eric Spector, (herein “the Plaintiff”) was and still is a resident of the County of New York, in the State of New York.
2. Upon information and belief, and at all relevant times herein, Robert Lefkowitz (hereinafter “the Defendant”) was and is a resident of the County of New York, in the State of New York.
3. The defendants sued herein as JOHN/JANE DOE (collectively, the “Doe Defendants”) are one or more natural persons and/or entities whose true names and identities are presently unknown to Plaintiff, who, upon information and belief, operated and/or controlled various anonymous or pseudonymous X (formerly Twitter) accounts referenced herein, including but not limited to the accounts colloquially known as “Max,” “Chucky/Knuckles,” and the “Jewish” account, and who published, republished, and/or amplified the defamatory statements and other wrongful conduct described in this Complaint. Plaintiff will amend this

pleading to substitute the true names and identities of the Doe Defendants once they are ascertained through discovery.

4. In or about early 2025, the Plaintiff became acquainted with the Defendant, Robert Lefkowitz, through the social media platform X and thereafter developed an in-person friendship with him.
5. At all relevant times, the Defendant, Robert Lefkowitz, was believed to be an administrator and creator of the X (formerly Twitter) account known as “Murray Hill Guy”, a then-small but rapidly growing social media account recognized for its humorous commentary on dating and life in New York City.¹
6. In or about March and April 2025, an anonymous X account within the New York social-media community—believed by many users to be operated by an individual known only as “Max”²—began directing harassing communications toward the “Murray Hill Guy” account. For reasons unknown to the Plaintiff, this anonymous account repeatedly asserted that the Plaintiff was responsible for operating the “Murray Hill Guy” account.
7. The Plaintiff subsequently obtained information indicating that the Defendant would, at times, impersonate other individuals, including the Plaintiff, for amusement and to deflect attention from himself when confronted or harassed online.
8. In or about April and May 2025, the individual operating the anonymous “Max” account persisted in posting photographs of various users and engaging in harassing conduct, with a

¹ An X account operating under the handle @MurrayHillGuy1 and whose true user is currently unknown to Plaintiff, but, as shown in this pleading, the Plaintiff has a good faith basis to believe the Defendant, Robert Lefkowitz, is at least one administrator/content creator of the Murray Hill Guy account. Plaintiff will amend the pleadings to substitute the user’s proper name and address upon identification.

² Max” is one of the unidentified defendants sued herein as JOHN/JANE DOE, whose true identity is presently unknown to the Plaintiff. The Plaintiff has alleged sufficient descriptive facts to permit identification through discovery and will amend the pleadings to substitute the individual’s true name once ascertained.

particular fixation on the Plaintiff and on the “Murray Hill Guy” account that he falsely perceived the Plaintiff to operate. The “Max” account repeatedly expressed hostility toward the content posted by “Murray Hill Guy,” despite publishing materially similar commentary regarding dating, women, and life in New York City.

9. Upon information and belief, part of the fixation on the Plaintiff stemmed from a rumor circulating among users that “Murray Hill Guy” had once published a private conversation involving an individual described as “Max’s crush”, which further increased “Max’s” unlawful conduct toward the Plaintiff.
10. In or about April and May 2025, a high-follower X account known as “JE,” operated by a Luke Buchhagen, published posts exhorting his followers to “DOXX3 MURRAY HILL GUY” and, in that context, disseminated the Plaintiff’s name, photograph, and personal identifying details, which posts generated view counts in the millions before they were eventually deleted.
11. Upon information and belief, Buchhagen did so under the mistaken belief—fostered and encouraged by the Defendant, Robert Lefkowitz, and/or the anonymous “Max” account, who repeatedly asserted to Buchhagen and others that the Plaintiff was the administrator and content creator of the “Murray Hill Guy” account—that Plaintiff was the individual behind “Murray Hill Guy.”
12. After deleting the posts, Buchhagen issued an apology and represented that he had been contacted by the anonymous “Max” account, which allegedly supplied “evidence” in the form of direct messages from the “Murray Hill Guy” account purporting to show that the

³ “Doxx-ing means to publicly reveal someone’s private, identifying information (name, address, workplace, phone number, photos, etc.) without their consent, usually with the intent to harass, threaten, or cause them harm.

- Plaintiff was the person behind that account. According to Buchhagen, those messages included statements in which “Murray Hill Guy” expressly claimed itself to be the Plaintiff.
13. Upon information and belief, the Defendants falsely represented themselves as Plaintiff to Buchhagen leading to the “doxing” of the Plaintiff.
14. In or about May and June 2025, the individual operating the anonymous “Max” account, emboldened by the above-described events, engaged in a sustained course of online harassment directed at the Plaintiff and others over a period of months, including but not limited to falsely referring to the Plaintiff as a “confirmed sex offender” in communications directed to the Plaintiff’s employer, and repeatedly publishing statements to third parties accusing the Plaintiff of being desperate for attention and unable to tolerate other accounts “having fun” or ignoring him.
15. Upon information and belief, “Max” engaged in this conduct under the mistaken belief, fostered and encouraged by Defendant Lefkowitz and the unidentified defendants, who continually represented to third parties that the Plaintiff was the administrator and content creator of the “Murray Hill Guy” account, and that Plaintiff was the individual behind “Murray Hill Guy.”
16. In the summer of 2025, as the Plaintiff’s responsibilities increased in connection with his new job, the Plaintiff and the Defendant communicated less frequently and with diminished cordiality and socialized in person on a less regular basis. During this period, the Defendant frequently exhibited immature and attention-seeking behavior, including complaining that the Plaintiff was not paying sufficient attention to him and acting resentful of the Plaintiff’s other professional and personal commitments.

17. Upon information and belief, while continuing to benefit from the popularity of the “Murray Hill Guy” account—including accepting advertising and brand deals for himself—the Defendant did little or nothing to correct the false public impression that the Plaintiff was the individual behind that account. Instead, the Defendant repeatedly threatened the Plaintiff that he would publish the Plaintiff’s photograph on the “Murray Hill Guy” account, thereby further associating the Plaintiff with the account in the eyes of the public.
18. During the same time period of summer of 2025, the Defendant began disclosing aspects of his past conduct that caused the Plaintiff substantial concern, including, by his own admission, having physically assaulted a close friend out of jealousy and having harassed women “for fun.” Although the Defendant intermittently expressed some remorse, he nevertheless continued to engage in inappropriate and disturbing behavior, prompting the Plaintiff to begin distancing himself from the Defendant, which caused the Defendant to have increased animosity towards the Plaintiff.
19. During this same period, as the “Murray Hill Guy” account continued to grow in popularity, and the Defendant began becoming increasingly enraged at individuals he perceived as his “enemies,” both in person and on X, and developed an unhealthy fixation on certain other accounts that he viewed as “cooler” or more popular than his own. Upon information and belief, the Defendant likewise became obsessed with friends he perceived as more successful than he was, particularly in their romantic lives group that came to include the Plaintiff.
20. By way of example, on one such occasion, the Plaintiff and the Defendant attended a social gathering together, during which the Plaintiff consensually kissed a woman at the bar. Thereafter, the Defendant reacted with disproportionate anger, stating that the Plaintiff’s

conduct was “weird” and that the Plaintiff “shouldn’t have done it,” while denigrating the woman’s appearance and insisting she was “not worth it,” in a manner that was inconsistent with the Defendant’s professed views and that all further demonstrated his jealousy and resentment toward the Plaintiff.

21. In or about September 2025, the Plaintiff and Defendant engaged in a contentious exchange of text messages during which the Defendant, emboldened by the growing popularity of the “Murray Hill Guy” account, arrogantly declared that the Plaintiff now had to “serve” him because of his social media status. When the Plaintiff responded that the Defendant was not acting as a good friend, the Defendant stated, in substance, that the Plaintiff was his “enemy,” that the Plaintiff would “face a doxx going forward,” and that the Defendant would “destroy” the Plaintiff “for good.”
22. The next day, the Defendant sent the Plaintiff a link to a post on X that “doxed” the Plaintiff and, in substance, told the Plaintiff “Good luck,” adding that he would not assist the Plaintiff in remedying the effects of the doxxing. Upon information and belief, the Defendant was the person who “doxed” the Plaintiff and admitted that he had replied to the doxing from the “Murray Hill Guy” account.
23. Upon information and belief, the Defendant was aware that doxing the Plaintiff was the most effective way to cause harm and distress to the Plaintiff, and he deliberately used threats—including doxxing Plaintiff—as a means of manipulating the Plaintiff into continued interaction with him.
24. In or about September of 2025, a newly created X account using the display name “Chucky”, which later renaming itself “Knuckles”, appeared and began posting harassing content

directed at various users. Shortly thereafter, this “Chucky/Knuckles” account published a viral post falsely stating, in substance, that “Eric Spector runs Murray Hill Guy. He is a confirmed creep and rapist,” accompanied by the Plaintiff’s photograph and tagging the Plaintiff’s employer so that the employer would see the accusation. The “Chucky/Knuckles” account further replied to a public post by the Plaintiff’s employer announcing the Plaintiff’s hiring by commenting “Rapist” directly underneath it.

25. Upon information and belief, the “Chucky/Knuckles” account acted under the mistaken belief—fostered and encouraged the Defendants, who repeatedly asserted that the Plaintiff was the administrator and content creator of the “Murray Hill Guy” account, and that the Plaintiff operated “Murray Hill Guy,” account.
26. In the aftermath of the “Chucky/Knuckles” post, the Defendant suggested to the Plaintiff that the new attacks were the work of “Max”, and proceeded to create group chats on X and other platforms that included Buchhagen and various individuals who had previously either harassed, or been harassed by, the “Murray Hill Guy” account. The Defendant actively encouraged discussion in these group chats while, in private communications with the Plaintiff, insinuating that certain participants were “in on” the harassment, furthering and exacerbating the Plaintiffs emotional distress.
27. During this same period, another X account identified as the “Jewish account” posted that he was tired of the “Murray Hill Guy” account allegedly harassing Jewish women and openly solicited private identifying information about the person behind “Murray Hill Guy” in order to make an exposé post. That weekend, the “Jewish” account published a viral post falsely

identifying the Plaintiff as the administrator of the “Murray Hill Guy” account and tagged the Plaintiff’s employer so that the employer would see the accusation.

28. Although this particular post did not explicitly use the word “rapist,” its content and tenor were substantially similar to the prior “rapist” accusation and similarly implied serious sexual misconduct by the Plaintiff. The post, along with the account that published it, was deleted a few days later, but only after it had been widely viewed and shared.
29. In or about September 2025, a few days after the above-described viral posts, the Defendant texted the Plaintiff whether he had been terminated from his employment. When the Plaintiff responded that he had not yet been fired but was on leave and under investigation, the Defendant dismissed the Plaintiff as “whiny,” accused the Plaintiff of lying, and asserted that the Plaintiff’s employer “probably doesn’t even know or care” about the online attacks. The Defendant continued, without any factual basis, to blame various mutual acquaintances for the anonymous defamatory post, stating in substance that “I know it’s them, they’re involved,” despite offering no evidence in support of these accusations. The Defendant further told the Plaintiff to “enjoy the publicity” and claimed it was “good” for the Plaintiff. The Plaintiff stopped texting the Defendant back.
30. When the Plaintiff did not respond to Defendants messages, the Defendant texted the Plaintiff “fuck you” for ignoring him and, shortly thereafter, posted the Plaintiff’s photograph from the “Murray Hill Guy” account, falsely impersonating the Plaintiff and thereby lending apparent confirmation to the false claim that the Plaintiff operated that account. The post used a sexually suggestive caption, stating in substance: “Bitches love an alpha male. Murray Hill Fitness coming soon.”

31. On or about X date, the Plaintiff was terminated from his employment “due to recent events” and despite having been an employee in good standing and having never received a negative formal performance review.
32. But for Defendants’ prior wrongful conduct in falsely publicizing Plaintiff as the administrator and content creator of the “Murray Hill Guy” account, the subsequent attacks on Plaintiff’s character and reputation, as well as the loss of his employment, would not have occurred.
33. In or about September 2025, the Plaintiff filed multiple police reports against Defendant arising from the conduct described herein. Within hours, and upon information and belief with knowledge of or in response to those reports, the post from the “Murray Hill Guy” account displaying the Plaintiff’s image with the caption “Bitches love an alpha male” were deleted. The Plaintiff informed the Defendant not to contact him again.
34. Despite this, the following day, the Defendant messaged the Plaintiff stating, in substance, “Hey pal I got him, I took down Chucky/Knuckles, I got all the proof I need. He’ll never attack us again, let me know when you want to be friends again,” implying that he had orchestrated and/or could control the “Chucky/Knuckles” account.
35. Upon information and belief, although the “Chucky/Knuckles” account remained in existence, all of its prior posts and replies—including the defamatory content targeting the Plaintiff and others—had been deleted.

**AS AND FOR A FIRST CAUSE OF ACTION: DEFAMATION AS TO ROBERT
LEFKOWITZ**

36. Plaintiff incorporates by reference each and every paragraph of this Complaint as if fully set forth verbatim herein.

37. Defendant made and caused to be made false statements of fact, and false implications of fact, about the Plaintiff to third parties, including but not limited to statements and implications that the Plaintiff:

- a. Operated and controlled the “Murray Hill Guy” account;
- b. Was responsible for the content and alleged harassment associated with that account; and
- c. Had engaged in wrongful conduct online and in connection with other users and accounts.

38. The Defendant communicated these false statements and implications directly and indirectly through, among other things, impersonating the Plaintiff in direct messages, representing to others, including “Max” and Buchhagen, that the Plaintiff was “Murray Hill Guy,” and replying from the “Murray Hill Guy” account in a manner designed to reinforce the false impression that Plaintiff ran the account.

39. These statements and implications were false when made, and the Defendant knew them to be false or acted in reckless disregard of their truth or falsity.

40. The Defendant published, and reasonably foresaw the republication of, these false statements and implications to numerous third parties, including other X users, followers of the “Murray Hill Guy” account, and Plaintiff’s employer and other potential employers.

41. The Defendant’s conduct was malicious and undertaken with the sole intent to harm the Plaintiff’s reputation and relationships.

42. As a direct and proximate result of the Defendant's defamatory statements and implications, the Plaintiff has suffered harm, including but not limited to reputational injury, humiliation, emotional distress, and economic damages, including job loss and future employment opportunities.
43. Plaintiff seeks compensatory, special, and consequential damages for these injuries in an amount to be determined at trial.

AS AND FOR A SECOND CAUSE: DEFAMATION PER SE AS TO ROBERT LEFKOWITZ

44. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 43 as if fully set forth herein.
45. In addition to the foregoing, the Defendant made and caused to be made statements, and encouraged, ratified, and amplified statements, that falsely accused the Plaintiff of serious sexual misconduct and criminal behavior, including, upon information and belief, that Plaintiff was a "creep," "rapist," "confirmed sex offender," and/or a sexual predator..
46. The Defendant also posted the Plaintiff's photograph from the "Murray Hill Guy" account with a sexually suggestive caption—"Bitches love an alpha male. Murray Hill Fitness coming soon."—and did so in the context of viral accusations that the Plaintiff was a sexual predator, thereby reinforcing the false implication that Plaintiff was dangerous and predatory.
47. These statements and implications constitute defamation per se in that they falsely impute serious crimes and sexual misconduct to the Plaintiff, and they tend to injure the Plaintiff in his trade, business, and profession.

48. The Defendant made and/or amplified these statements with actual malice—knowing they were false or with reckless disregard for their truth or falsity—and with the sole intent to harm the Plaintiff’s reputation and cause him to suffer personal and professional consequences.
49. As a direct and proximate result of the Defendant’s defamation per se, the Plaintiff has suffered presumed general damages, together with actual damages including loss of employment, loss of prospective employment opportunities, emotional distress, humiliation, and other harm.
50. The Plaintiff is entitled to general and special damages, and to an award of punitive damages in an amount sufficient to punish Defendant and deter similar misconduct.

AS AND FOR A THIRD CAUSE OF ACTION: DEFAMATION AS TO AND AGAINST JOHN/JANE DOE DEFENDANTS, INCLUDING “MAX,” “CHUCKY/KNUCKLES,” AND THE “JEWISH” ACCOUNT

51. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 50 as if fully set forth herein.
52. At all relevant times, one or more unknown individuals operated the anonymous or pseudonymous accounts referred to herein as “Max,” “Chucky/Knuckles,” the “Jewish” account, and other similar accounts (collectively, the JOHN/JANE DOE Defendants).
53. The JOHN/JANE DOE Defendants published, and caused to be published, numerous false statements and implications about the Plaintiff, including that the Plaintiff:
- a. Operated and controlled the “Murray Hill Guy” account;
 - b. Was responsible for alleged harassment of Jewish women and other users via that account; and,

c. Engaged in wrongful and abusive conduct online.

54. These statements and implications were false when made. The JOHN/JANE DOE Defendants had no basis to believe them to be true and, upon information and belief, relied on rumors and representations fostered and encouraged by Defendant Lefkowitz.
55. The JOHN/JANE DOE Defendants published these statements to third parties, including large online audiences on X and the Plaintiff's employer, which was expressly tagged or mentioned in certain posts to ensure that it would see the accusations.
56. The JOHN/JANE DOE Defendants acted maliciously in publishing and amplifying these false statements and implications.
57. As a direct and proximate result, the Plaintiff has suffered reputational damage, humiliation, emotional distress, and economic harm, including but not limited to damage to his employment and future earning capacity.
58. The Plaintiff will identify the JOHN/JANE DOE Defendants through discovery and will amend the Complaint to substitute their true names once ascertained.
59. The Plaintiff seeks compensatory, special, and consequential damages from the JOHN/JANE DOE Defendants.

**AS TO AND FOR THE FOURTH CAUSE OF ACTION: DEFAMATION PER SE AS TO
AND AGAINST JOHN/JANE DOE DEFENDANTS, INCLUDING "MAX,"
"CHUCKY/KNUCKLES," THE "JEWISH" ACCOUNT**

60. The Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 59 as if fully set forth herein.

61. The JOHN/JANE DOE Defendants made and published statements that, on their face, falsely accused the Plaintiff of serious criminal and sexual misconduct, including but not limited to:
- a. that the Plaintiff runs Murray Hill Guy.
 - b. the Plaintiff is a confirmed “creep” and rapist.”
 - c. statements to the Plaintiff’s employer and others that Plaintiff was a “confirmed sex offender.”
 - d. posts and commentary implying that the Plaintiff was a sexual predator who had engaged in serious wrongdoing toward women and others.
62. These statements constitute defamation per se in that they falsely attribute serious crimes and sexual misconduct to the Plaintiff and, independently, tend to injure the Plaintiff in his trade, business, and profession.
63. The JOHN/JANE DOE Defendants published these statements to wide online audiences, including by tagging the Plaintiff’s employer and responding directly to the employer’s public announcement of the Plaintiff’s hiring with the comment “Rapist,” intending that these accusations be seen and credited.
64. The JOHN/JANE DOE Defendants acted with actual malice and with reckless disregard for the truth, in that they published accusations of rape and sexual predation without any factual basis, relying on rumors and hostile online narratives rather than any investigation or verification.
65. As a direct and proximate result of the JOHN/JANE DOE Defendants’ defamation per se, the Plaintiff has suffered presumed general damages and actual harm, including loss of

employment, loss of future employment opportunities, emotional distress, humiliation, and other damages.

66. The Plaintiff seeks general and special damages, and punitive damages against the JOHN/JANE DOE Defendants, in amounts to be determined at trial.

AS TO AND FOR THE FIFTH CAUSE OF ACTION: INTENTIONAL INFLICTION OF EMOTION DISTRESS AS TO ROBERT LEFKOWITZ

67. The Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 66 as if fully set forth herein.

68. As set forth above, Defendant Robert Lefkowitz engaged in a deliberate, sustained, and escalating course of conduct directed at the Plaintiff, including but not limited to:

- a. threatening that the Plaintiff was his “enemy,”
- b. that the Plaintiff would “face a doxx going forward,” and that the Defendant would “destroy” Plaintiff “for good”;
- c. impersonating the Plaintiff in online communications and direct messages, including to “Max” and Luke Buchhagen, in order to falsely portray the Plaintiff as the person behind the “Murray Hill Guy” account and as having engaged in wrongful conduct;
- d. fostering and encouraging a hostile online narrative that the Plaintiff was responsible for the “Murray Hill Guy” account and for alleged harassment of women and others;
- e. participating in, causing, and/or amplifying the doxxing of the Plaintiff—i.e., the public dissemination of Plaintiff’s name, photograph, and identifying details—in connection with accusations that the Plaintiff was a “creep,” “rapist,” or “confirmed sex offender”;

- f. posting the Plaintiff's photograph from the "Murray Hill Guy" account, falsely impersonating the Plaintiff and using a sexually suggestive caption ("Bitches love an alpha male. Murray Hill Fitness coming soon.") in the wake of viral accusations, thereby reinforcing and capitalizing on the false narrative that Plaintiff was a dangerous sexual predator; and
- g. continuing to taunt the Plaintiff about the online attacks and his employment status, telling the Plaintiff to "enjoy the publicity" and claiming it was "good" for Plaintiff, even as Plaintiff was under investigation and then terminated from his job.

69. The Defendant undertook this campaign of threats, impersonation, humiliation, and public targeting intentionally and maliciously, and/or with reckless disregard of the substantial likelihood that the Plaintiff would suffer severe emotional distress as a result.

70. The Defendant's conduct, individually and collectively, was extreme and outrageous, going beyond all possible bounds of decency and utterly intolerable in a civilized community, particularly given that the Defendant targeted the Plaintiff's livelihood, reputation, and sense of personal safety by associating him with rape, sexual predation, and harassment, and by directing these accusations to the Plaintiff's employer.

71. As a direct and proximate result of the Defendant's extreme and outrageous conduct, the Plaintiff has suffered severe emotional distress, including but not limited to anxiety, humiliation, fear, mental anguish, and other psychological and emotional injuries, together with associated physical manifestations of stress.

72. The Plaintiff is entitled to recover compensatory damages for his emotional and psychological injuries, together with punitive damages in an amount sufficient to punish the Defendant and deter similar misconduct in the future.

AS TO AND FOR THE SIXTH CAUSE OF ACTION: INTENTION INFLICTION OF EMOTION DISTRESS AS TO AND AGAINST JOHN/JANE DOE DEFENDANTS, INCLUDING “MAX,” “CHUCKY/KNUCKLES,” AND THE “JEWISH” ACCOUNT

73. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 72 as if fully set forth herein.

74. As set forth above, the anonymous and pseudonymous X (formerly Twitter) accounts referred to herein as “Max,” “Chucky/Knuckles,” the “Jewish” account, and other unidentified accounts (collectively, the **JOHN/JANE DOE Defendants**) engaged in a sustained and coordinated online campaign targeting Plaintiff.

75. This campaign included, among other things:

- a. Persistently harassing and impersonating Plaintiff;
- b. Publishing a viral post stating, in substance, “Eric Spector runs Murray Hill Guy. He is a confirmed creep and rapist,” accompanied by Plaintiff’s photograph and tagging Plaintiff’s employer;
- c. Calling Plaintiff a “confirmed sex offender” in communications directed to Plaintiff’s employer and others;
- d. Replying “Rapist” directly under Plaintiff’s employer’s public announcement of Plaintiff’s hiring;
- e. Publishing and amplifying posts implying that Plaintiff had harassed Jewish women and others and should be exposed and punished; and
- f. Continuing online harassment for months, including repeated efforts to incite others to shun, report, and attack Plaintiff.

76. The JOHN/JANE DOE Defendants carried out this pattern of conduct intentionally, maliciously, and/or with reckless disregard of the substantial likelihood that falsely branding the Plaintiff as a “rapist,” “confirmed sex offender,” and sexual predator—particularly while tagging his employer—would cause the Plaintiff severe emotional distress and jeopardize his job and personal safety.
77. The conduct of the JOHN/JANE DOE Defendants, taken as a whole, was extreme and outrageous and far beyond the bounds of decency tolerated in a civilized society. Falsely and publicly accusing the Plaintiff, by name and face, of rape and serious sexual offenses, and directing those accusations to his employer and the wider public, is inherently outrageous and calculated to inflict maximum emotional and reputational harm.
78. As a direct and proximate result of the JOHN/JANE DOE Defendants’ extreme and outrageous conduct, the Plaintiff has suffered severe emotional distress, including but not limited to anxiety, humiliation, fear, mental anguish, and other psychological and emotional injuries, together with associated physical manifestations of stress.
79. The Plaintiff will identify the JOHN/JANE DOE Defendants through discovery and will amend this Complaint to substitute their true names once ascertained.
80. The Plaintiff seeks compensatory damages for his emotional and psychological injuries, together with punitive damages against the JOHN/JANE DOE Defendants in an amount sufficient to punish them and deter similar misconduct.

**AS TO AND FOR THE SEVENTH CAUSE OF ACTION: NEGLIGENCE AS TO
ROBERT LEFKOWITZ**

81. The Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 80 as if fully set forth herein.
82. At all relevant times, the Defendant Robert Lefkowitz owed the Plaintiff a duty to exercise reasonable care in his statements, actions, and online conduct concerning the Plaintiff, including a duty not to carelessly misidentify the Plaintiff as the operator of the “Murray Hill Guy” account, not to carelessly disseminate or encourage the dissemination of the Plaintiff’s personal identifying information, and not to expose the Plaintiff to foreseeable reputational and economic harm.
83. It was reasonably foreseeable to the Defendant that tagging or otherwise directing defamatory accusations and “doxxing” content at the Plaintiff’s employer and to large online audiences, and falsely associating the Plaintiff with alleged harassment and sexual misconduct, would jeopardize the Plaintiff’s employment, career prospects, reputation, and emotional well-being.
84. The Defendant breached his duty of reasonable care to the Plaintiff, including but not limited to by:
- a. Carelessly and recklessly representing or implying to others that the Plaintiff operated and controlled the “Murray Hill Guy” account;
 - b. Carelessly impersonating the Plaintiff in communications and direct messages without regard for the truth or the consequences of doing so;
 - c. Carelessly fostering, amplifying, and participating in the “doxxing” of the Plaintiff and the dissemination of his name, photograph, and personal details in connection with accusations of harassment and sexual misconduct; and
 - d. Failing to take reasonable steps to correct false narratives he had helped create or reinforce, even as he became aware that the Plaintiff’s job and reputation were at risk.

85. The Defendant’s conduct was a direct and proximate cause of the Plaintiff’s injuries, including the Plaintiff’s loss of employment, damage to his reputation, loss of future economic opportunities, and emotional distress.
86. As a result of Defendant’s negligence, Plaintiff has suffered and continues to suffer economic loss, reputational harm, and emotional injuries, and he is entitled to compensatory damages in an amount to be determined at trial.

AS TO AND FOR THE EIGHTH CAUSE OF ACTION: NEGLIGENCE AS TO AND AGAINST JOHN/JANE DOE DEFENDANTS, INCLUDING “MAX,” “CHUCKY/KNUCKLES,” AND THE “JEWISH” ACCOUNT

87. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 86 as if fully set forth herein.
88. At all relevant times, the anonymous and pseudonymous individuals operating the accounts referred to herein as “Max,” “Chucky/Knuckles,” the “Jewish” account, and other unidentified accounts (collectively, the JOHN/JANE DOE Defendants) owed the Plaintiff a duty to exercise reasonable care before publishing and amplifying serious accusations about the Plaintiff, including accusations of criminal and sexual misconduct, and before directing such accusations to the Plaintiff’s employer and the general public.
89. It was reasonably foreseeable to the JOHN/JANE DOE Defendants that publicly accusing the Plaintiff, with photograph, of being a “creep,” “rapist,” “confirmed sex offender,” and similar labels, and tagging his employer with such accusations, would cause grave harm to the Plaintiff’s reputation, employment, and emotional well-being.
90. The JOHN/JANE DOE Defendants breached their duty of care to the Plaintiff by, in one or more of the following ways:

- a. carelessly publishing and republishing accusations that the Plaintiff was a “rapist,” “confirmed sex offender,” “creep,” or sexual predator, without any factual basis and without verifying the truth of such accusations;
 - b. carelessly relying on rumors, hostility, and unverified representations regarding the identity of the “Murray Hill Guy” account operator;
 - c. carelessly tagging the Plaintiff’s employer and replying “Rapist” under the employer’s announcement of the Plaintiff’s hiring, in reckless disregard of the foreseeable impact on the Plaintiff’s employment; and
 - d. failing to retract or correct their accusations in a timely and meaningful manner, even after it became apparent that the Plaintiff was suffering serious consequences.
91. The negligent acts and omissions of the JOHN/JANE DOE Defendants were a direct and proximate cause of the Plaintiff’s injuries, including the termination of his employment, loss of income and benefits, damage to his professional reputation, and severe emotional distress.
92. The Plaintiff will identify the JOHN/JANE DOE Defendants through discovery and will amend this Complaint to substitute their true names once ascertained.
93. The Plaintiff seeks compensatory damages from the JOHN/JANE DOE Defendants, jointly and severally, in an amount to be determined at trial.

AS TO AND FOR THE NINTH CAUSE OF ACTION NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS AS TO AND AGAINST ROBERT LEFKOWITZ

94. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 93 as if fully set forth herein.
95. At all relevant times, Defendant Robert Lefkowitz owed THE Plaintiff a duty to exercise reasonable care so as not to engage in conduct that would unreasonably endanger Plaintiff’s emotional well-being or create an unreasonable risk of causing THE Plaintiff severe

emotional distress, particularly where the Defendant knew or should have known that his conduct would directly impact the Plaintiff's livelihood, reputation, and sense of personal safety.

96. It was reasonably foreseeable to the Defendant that falsely portraying the Plaintiff as the operator of the "Murray Hill Guy" account, impersonating Plaintiff in communications with hostile third parties, fostering and encouraging the doxxing of the Plaintiff, and associating the Plaintiff's name and image with accusations of rape, sexual predation, and harassment—especially while tagging the Plaintiff's employer—would create a serious risk of causing the Plaintiff severe emotional distress and associated physical and economic harm.
97. The Defendant breached his duty of care by, among other things, carelessly and recklessly misidentifying the Plaintiff as "Murray Hill Guy," encouraging and amplifying doxxing and defamatory narratives about the Plaintiff, failing to take reasonable steps to correct falsehoods he had helped propagate, and continuing to taunt the Plaintiff about the attacks and his employment status in the face of obvious and escalating harm.
98. The Defendant's negligent acts and omissions, as described herein, created an unreasonable risk of causing the Plaintiff severe emotional distress and in fact did cause the Plaintiff to suffer severe emotional distress, including but not limited to anxiety, humiliation, mental anguish, fear for his professional future, and associated physical manifestations of stress.
99. As a direct and proximate result of the Defendant's negligence and the unreasonable risk of emotional harm he created, Plaintiff has suffered and continues to suffer severe emotional distress and related damages, and he is entitled to recover compensatory damages in an amount to be determined at trial.

**AS TO AND FOR THE TENTH CAUSE OF ACTION NEGLIGENT INFLICTION
OF EMOTIONAL DISTRESS AS TO AND AGAINST JOHN/JANE DOE
DEFENDANTS, INCLUDING “MAX,” “CHUCKY/KNUCKLES,” AND THE
“JEWISH” ACCOUNT**

100. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 99 as if fully set forth herein.

101. At all relevant times, the anonymous and pseudonymous individuals operating the accounts referred to herein as “Max,” “Chucky/Knuckles,” the “Jewish” account, and other unidentified accounts (collectively, the JOHN/JANE DOE Defendants) owed THE Plaintiff a duty to exercise reasonable care so as not to engage in conduct that would unreasonably endanger the Plaintiff’s emotional well-being or create an unreasonable risk of causing him severe emotional distress, particularly when publishing serious accusations of criminal and sexual misconduct directed at Plaintiff by name and image.

102. It was reasonably foreseeable to the JOHN/JANE DOE Defendants that publicly accusing the Plaintiff of being a “creep,” “rapist,” “confirmed sex offender,” or sexual predator, and tagging his employer and large online audiences with such accusations, would create a grave and unreasonable risk of causing the Plaintiff severe emotional distress, jeopardizing his employment, and subjecting him to public hatred, contempt, and ridicule.

103. The JOHN/JANE DOE Defendants breached their duty of care by, among other things, carelessly publishing and amplifying accusations of rape and serious sexual misconduct without any factual basis or verification; carelessly relying on rumors and hostile online narratives about the identity of the “Murray Hill Guy” account; and

carelessly directing these accusations at the Plaintiff's employer and professional networks.

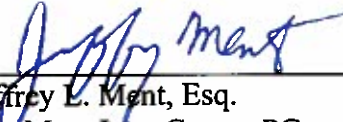
104. The negligent acts and omissions of the JOHN/JANE DOE Defendants created an unreasonable risk of causing the Plaintiff severe emotional distress and, in fact, resulted in the Plaintiff suffering severe emotional distress, including but not limited to anxiety, humiliation, mental anguish, fear for his professional future, and associated physical manifestations of stress.

105. As a direct and proximate result of the JOHN/JANE DOE Defendants' negligence, the Plaintiff has suffered severe emotional distress and related damages, including emotional, reputational, and economic harm. The Plaintiff will identify the JOHN/JANE DOE Defendants through discovery and will amend this Complaint to substitute their true names once ascertained.

106. The Plaintiff seeks compensatory damages from the JOHN/JANE DOE Defendants, jointly and severally, in an amount to be determined at trial.

WHEREFORE, the Plaintiff demands judgment against the Defendants on the First, Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, and Tenth Causes of Action in amounts which exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with interest, costs and disbursements.

Dated: New York City, NY
December 19, 2025



Jeffrey E. Ment, Esq.
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jment@mentlaw.com

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

-----X Index No.:

ERIC SPECTOR,

Plaintiff,

-against-

ROBERT LEFKOWITZ, JOHN DOE,
AND JANE DOE

Defendants,

The Ment Law Group, PC
Attorney for the Plaintiff
305 Broadway, Suite 700
New York, NY 10007
Telephone: (860) 969-3200
jment@mentlaw.com

SUMMONS, VERIFIED COMPLAINT, VERIFICATION

Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney duly admitted to practice in the Courts of New York State, certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed documents are not frivolous.

Dated: December 19, 2025



Jeffrey L. Ment, Esq.

Service of the foregoing is hereby admitted: _____

Dated: _____

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

-----X Index No.:
ERIC SPECTOR,

**VERIFICATION OF
PLAINTIFF**

Plaintiff,

-against-

ROBERT LEFKOWITZ, JOHN DOE,
AND JANE DOE

Defendants,

-----X

STATE OF CONNECTICUT))
COUNTY OF HARTFORD)) SS: Hartford

Eric Spector, being duly sworn, deposes and says under penalties of perjury as follows:

I am the Plaintiff in the within action. I have read the Verified Complaint and know the contents thereof and verify the same is true to my own personal knowledge, except as matters stated to be alleged upon information and belief, and as to those matters, I believe them to be true.

Dated: _____

By: 
ERIC SPECTOR
Plaintiff

Sworn and subscribed before me this ____ day of December, 2025.

Notary Public