

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

**MEMORANDUM OF LAW IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS**

Jay M. Wolman
jmw@randazza.com
RANDAZZA LEGAL GROUP, PLLC
Office Address:
353 Ocean Avenue, Suite 4E
Brooklyn, NY 11226
Mailing Address:
100 Pearl Street, 14th Floor
Hartford, CT 06103

Marc J. Randazza (*pro hac vice* pending)
ecf@randazza.com
RANDAZZA LEGAL GROUP, PLLC
30 Western Avenue
Gloucester, MA 01930

TABLE OF CONTENTS

1.0 STATEMENT OF FACTS 1

2.0 LEGAL STANDARD..... 5

3.0 ARGUMENT..... 6

 3.1 PLAINTIFF’S COMPLAINT IS SUBJECT TO THE ANTI-SLAPP LAW..... 6

 3.2 THE DEFAMATION CLAIMS ARE MERITLESS..... 9

 3.2.1 Defamation *Per Se* is Nonactionable 11

 3.2.1.1 Plaintiff Failed to Specifically Plead the Alleged Defamation 13

 3.2.1.2 The Statements Were Not Made with Actual Malice 14

 3.2.2 Defamation Per Quod Does Not Survive Scrutiny 16

 3.3 THE IIED CLAIM IS IMPROPER 17

 3.4 LEFKOWITZ WAS NOT NEGLIGENT 20

 3.5 THE NIED CLAIM CANNOT PROCEED..... 21

 3.6 FEES SHOULD BE AWARDED 22

4.0 CONCLUSION..... 22

TABLE OF AUTHORITIES

CASES

<i>A.M.P. v Benjamin</i> , 201 AD3d 50 (2d Dept. 2021).....	21
<i>Aronson v. Wiersma</i> , 65 NY2d 592 (1985)	9
<i>Aykac v. City of N.Y.</i> , 2022 NY Slip Op 33639(U) (Sup. Ct. N.Y. Cty. Oct. 20, 2022)	21
<i>Balliet v. Kottamasu</i> , 76 Misc 3d 906 (Civ. Ct. Kings Cty. Aug. 9, 2022)	7
<i>Banaian v. Bascom</i> , 175 NH 151 (2022)	12
<i>Bartnicki v. Vopper</i> , 532 US 514 (2001)	18
<i>Belco Petroleum Corp. v. AIG Oil Rig</i> , 164 AD2d 583 (1st Dept. 1991)	14
<i>Bement v. N.Y.P. Holdings, Inc.</i> , 307 AD2d 86 (1st Dept. 2003)	19
<i>Bose Corp. v. Consumers Union</i> , 466 US 485 (1984)	15
<i>Brian v. Richardson</i> , 87 NY2d 46 (1995)	9
<i>Butler v. Del. Otsego Corp.</i> , 203 AD2d 783 (3d Dept. 1994).....	20
<i>Chau v. Lewis</i> , 771 F3d 118 (2d Cir. 2014).....	11
<i>Coleman v. Grand</i> , 158 F4th 132 (2d Cir. 2025).....	7
<i>Coleman v. Grand</i> , 523 F Supp 3d 244 (E.D.N.Y. 2021).....	6, 7
<i>Collectors Emporium v. Cernera</i> , No. 607917/2025, 2025 N.Y. Misc. LEXIS 8156 (Sup. Ct. Nassau Cty. Oct. 7, 2025).....	6
<i>Commonwealth v. Blache</i> , 450 Mass 583 (2008).....	15
<i>Ctr. for Med. Progress v. Planned Parenthood</i> , 551 F Supp. 3d 320 (S.D.N.Y. 2021).....	6
<i>Cusimano v. United Health Servs. Hosps., Inc.</i> , 291 AD3d 1149 (3d Dept. 2012).....	20

Davis v. Boeheim,
24 NY3d 262 (2014) 9

Dillon v City of New York,
261 AD2d 34 (1st Dept. 1999)..... 9, 13, 16

Dykstra v. St. Martin’s Press LLC,
2020 NY Slip Op 31813(U) (Sup. Ct. N.Y. Cty. May 19, 2020)..... 16

Egiazaryan v. Zalmayev,
880 F Supp 2d 494 (S.D.N.Y. 2012)..... 11

Ferreira v. City of Binghamton,
38 NY3d 298 (2022) 20

Fredin v. Middlecamp,
500 F Supp 3d 752 (D. Minn. 2020) 7

Ganske v. Mensch,
480 F Supp 3d 542 (S.D.N.Y. 2020)..... 10

Garrison v. Louisiana,
379 US 64 (1964) 14

Gillespie v. Kling,
217 AD3d 566 (1st Dept. 2023)..... 9

Giuffrida v. Citibank Corp.,
100 NY2d 72 (2003) 17

Goldblatt v Seaman,
225 AD2d 585 (2d Dept. 1996)..... 14

Goldman v. Reddington,
2021 US Dist. LEXIS 78103 (E.D.N.Y. Apr. 21, 2021)..... 7

Golub v. Enquirer/Star Grp.,
89 NY2d 1074 (1997) 9, 16

Goradze v. Itskovich,
2025 NY Slip Op 34829(U) (Sup. Ct. N.Y. Cty. Dec. 12, 2025)..... 21

Goshen v. Mut. Life Ins. Co.,
98 NY2d 314 (2002) 5

Harte-Hanks Commc’ns, Inc. v. Connaughton,
491 US 657 (1989) 14

InkMango, Inc. v. Warren,
221 NYS3d 922 (Sup. Ct. N.Y. Cty. 2024)..... 14, 15

InkMango, Inc. v. Warren,
No. 152802/24 (1st Dept. Nov. 18, 2025)..... 14

Jacobus v. Trump,
51 NYS3d 330 (Sup. Ct. N.Y. Cty. Jan. 9, 2017) 8

<i>Jacobus v. Trump</i> , 64 NYS3d 889 (2017)	9
<i>James v. Gannett Co.</i> , 40 NY2d 415 (1976)	8
<i>Leibowitz v. Bank Leumi Tr. Co.</i> , 152 AD2d 169 (2d Dept. 1989).....	18
<i>Lewis v. Newsday, Inc.</i> , 246 AD2d 434 (1st Dept. 1998).....	7
<i>Lieberman v Gelstein</i> , 80 NY2d 429 (1992)	12, 14
<i>Mahoney v. Adirondack Pub. Co.</i> , 71 NY2d 31 (1987)	15
<i>Mandarin Trading Ltd. v Wildenstein</i> , 17 Misc 3d 1118[A], 2007 NY Slip Op 52059[U] (Sup Ct., N.Y. Cty. 2007)	13
<i>Mandarin Trading Ltd. v Wildenstein</i> , 65 AD3d 448 (1st Dept. 2009).....	13
<i>Miller v. James</i> , 751 F Supp 3d 21 (N.D.N.Y. 2024)	11
<i>Navarro v. Fed. Paper Bd. Co.</i> , 185 AD2d 590 (3d Dept. 1992).....	20
<i>Packingham v. North Carolina</i> , 582 US 98 (2017)	7
<i>Rakofsky v. Wash. Post</i> , 39 Misc. 3d 1226(A) (Sup. Ct. N.Y. Cty. Apr. 29, 2013)	21
<i>Reeves v. Associated Newspapers, Ltd.</i> , 218 NYS3d 19 (1st Dept. 2024).....	6, 8, 21
<i>Reeves v. Associated Newspapers, Ltd.</i> , 44 NY3d 990 (2025)	6
<i>Rosa v. Eaton</i> , 2024 US Dist LEXIS 112753 (S.D.N.Y. June 25, 2024).....	10
<i>Saadi Ouaaz v. Crumiller P.C.</i> , 2025 NY Slip Op 31024(U) (Sup. Ct. Kings Cnty. Mar. 21, 2025)	8
<i>Salvatore v. Kumar</i> , 45 AD3d 560 (1st Dept. 2007).....	9
<i>Sandals Resorts Int'l Ltd. v. Google, Inc.</i> , 925 NYS2d 407 (1st Dept. 2011).....	10
<i>Satanic Temple, Inc. v. Newsweek Mag. LLC</i> , 774 F Supp3d 688 (S.D.N.Y. 2025).....	14

Schwartz v. Nordstrom, Inc.,
553 NYS2d 684 (1st Dept. 1990)..... 11

Small Bus. Bodyguard Inc. v. House of Moxie, Inc.,
230 F Supp 3d 290 (S.D.N.Y. 2017)..... 11

Smigo v. N.Y.P. Holdings, Inc.,
2010 NY Slip Op 30556(U) (Sup. Ct. N.Y. Cty. Mar. 17, 2010) 19

Sprecher v. Thibodeau,
148 AD3d 654 (1st Dept. 2017)..... 21

Springer v. Almontaser,
904 N.Y.S. 2d 765 (2d Dept. 2010) 11

St. Amant v. Thompson,
390 US 727 (1968) 14

State v. Massey,
476 P3d 420 (Kan. Ct. App. 2020)..... 15

Steinhilber v. Alphonse,
68 NY2d 283 (1986) 10

Taggart v. Costabile,
131 AD3d 243 (2d Dept. 2015)..... 18

Talbert v. Tynes,
2025 NYLJ LEXIS 2599 (Sup. Ct. N.Y. Cty. Jul. 30, 2025)..... 7, 9

Talbert v. Tynes,
2026 N.Y. App. Div. LEXIS 1571 (1st Dept. Mar. 17, 2026) 7, 10, 13

VIP Pet Grooming Studio, Inc. v. Sproule,
203 NYS3d 681 (2d Dept. 2024) 8

Waldbaum v. Fairchild Publ'ns,
627 F2d 1287 (D.C. Cir. 1980) 8

Weiss v. Nolan,
2014 NY Slip Op 31304(U) (Sup. Ct. N.Y. Cty. May 19, 2014)..... 17

Zeitlin v. Cohan,
2022 NY Slip Op 32878(U) (Sup. Ct. N.Y. Cty. Aug. 24, 2022) 7, 15

Zeitlin v. Cohan,
220 AD3d 631 (1st Dept. 2023)..... 14

STATUTES

47 U.S.C. § 230..... 12, 19

CVR § 70-a 22

CVR § 76-a..... 6, 8, 14

N.Y. Penal Law § 130.00..... 15

OTHER AUTHORITIES

Danielle Boland, *“What is Gooning? Details, Dangers of Recent Sexual Trend,”* Birches Health
(last updated Jan. 23, 2026)..... 3

RULES

CPLR 3016 13, 16

CPLR 3211 passim

CONSTITUTIONAL PROVISIONS

U.S. Const. amend. I..... 14, 18

Eric Spector filed a SLAPP suit against Robert Lefkowitz because Spector didn't like mean things said about him on X/Twitter. Spector also doesn't like that Lefkowitz allegedly said that Spector ran the "Murray Hill Guy" X account. He didn't. But someone did—Spector, himself tried on multiple occasions to claim to be "Murray Hill Guy." Lefkowitz moves to dismiss this action per CPLR 3211(a)(1) & (7) and CPLR 3211(g). In a pre-filing meet-and-confer, Plaintiff's counsel asserted discovery was necessary to determine if Lefkowitz actually made the statements he is alleged to have made. Discovery is not necessary; there is no case even if Lefkowitz made the statements and Lefkowitz assumes, for this motion, that everything alleged is true.

1.0 STATEMENT OF FACTS

As alleged by Spector (Complaint, **Exhibit 1**, NYSCEF Doc. No. 2), he and Lefkowitz met online in 2025 and became friends. **Ex. 1** at ¶4. He believed Lefkowitz operated the X/Twitter account "Murray Hill Guy" under the handle @MurrayHillGuy1, which is a "rapidly growing social media account recognized for its humorous commentary on dating and life in New York City." *Id.* at ¶5 and n.1. The account "continued to grow in popularity[.]" *Id.* at ¶19.

The friendship began to deteriorate in the Summer of 2025. *Id.* at ¶¶16 & 18. Lefkowitz said he was going to publish Spector's photograph. *Id.* at ¶17. Lefkowitz would sometimes impersonate Plaintiff and others for amusement. *Id.* at ¶7. Lefkowitz also disapproved of Spector meeting a stranger at a bar and kissing her. *Id.* at ¶20. In September 2025, Spector and Lefkowitz got into a disagreement, with Lefkowitz calling Spector his "enemy" who would "face a doxx going forward," and who would be "destroy[ed]" "for good." *Id.* at ¶21. Spector was "doxed" the following day (*id.* at ¶22), though his information was already public.

A surprising number of people other than Lefkowitz disliked Spector. In March-April 2025, one of the Doe defendants a/k/a "Max" sent harassing communications to the "Murray Hill Guy" account and asserted the Spector operated that account. *Id.* at 6-7. In April-May 2025,

another individual, non-party Luke Buchhagen, posted that Spector was “Murray Hill Guy” and gave out his name, photograph, and personal identifying details. *Id.* at ¶10. Spector asserts Buchhagen obtained this information from Lefkowitz or Max. *Id.* at ¶¶11-12. There are no allegations that Lefkowitz caused Buchhagen to publish anything.

In May-June 2025, *Max* started publishing that Spector was a “confirmed sex offender” and calling Plaintiff desperate for attention. *Id.* at ¶14. Once more, Spector avers Lefkowitz and unidentified others told Max that Spector ran the “Murray Hill Guy” account. *Id.* at ¶15. There are no factual allegations that Lefkowitz caused *Max* to publish anything.

In September 2025, another account, alternately named “Chucky” and “Knuckles” posted that Spector ran the “Murray Hill Guy” account, calling him a “confirmed creep and rapist” along with Plaintiff’s photograph and tagging Plaintiff’s employer. *Id.* at ¶24. Once again, Spector asserts Lefkowitz and other defendants were responsible for this. *Id.* at ¶25. At around the same time, the “Jewish account” also identified Spector as the operator of the “Murray Hill Guy” account, tagged Plaintiff’s employer, and accused Plaintiff of sexual misconduct. *Id.* at ¶27. There are no factual allegations that Lefkowitz caused “Jewish account” to publish anything.

Thereafter, Spector’s employer began an unspecified investigation. *Id.* at ¶29. During this period, Lefkowitz posted Spector’s photograph online, with a caption “Bitches love an alpha male. Murray Hill Fitness coming soon.” *Id.* at ¶30. Though Plaintiff claims Lefkowitz impersonated Spector, the picture and caption speak for themselves, which sound more in mockery than impersonation.

Plaintiff lost his job allegedly “due to recent events” though Plaintiff makes no indication it had anything to do with anything Lefkowitz did. *Id.* at ¶31.

Additional facts and context shed light on what actually happened. Spector admired the “Murray Hill Guy” popularity and desperately tried to become as popular or “viral.” (**Exhibit 2**, Affidavit of Lefkowitz, at ¶10). In fact, Spector **himself** would brag that he was “Murray Hill Guy.” *Id.* at ¶¶13-14. Meanwhile, Spector operates the account @goonboss_. *Id.* at ¶3. The “Goonboss” account makes “Murray Hill Guy” look prudish and Spector’s own statements are toxic and indict his character in a far worse way than anything any third party said about him.

It appears Spector attempted to spoliage evidence and scrub his account. *Id.* at ¶32. Spector cannot escape his his “@goonboss_” tweets:¹

Date	Text	Exhibit Number
3/24/25	How to masturbate at work without getting caught: a thread 1/27 [thread spool emoji] ²	3
3/24/25	If you unfollow me I’m coming to your house ³	4
3/24/25	Going up to Brazilian women and saying “Hey beautiful, your greencard prince has arrived” wish me luck ⁴	5
3/24/25	Had sex with my son’s girlfriend. Thank god she took the pill ⁵	6
3/25/25	If you aren’t willing to fuck your son’s girlfriend, you don’t have what it takes to make it in today’s world ⁶	7
3/25/25	Driving is a Y chromosome activity ⁷	8

¹ “Gooning is an extreme form of prolonged masturbation, related in part to another popular term – ‘edging’. While edging is about delayed pleasure from masturbation, gooning prolongs masturbation for so long that it is said to cause a blissful or “gooned out” state-of-mind.” Danielle Boland, “*What is Gooning? Details, Dangers of Recent Sexual Trend*,” Birches Health (last updated Jan. 23, 2026) <https://bircheshealth.com/resources/gooning>

²https://web.archive.org/web/20250324204115/https://twitter.com/goonboss_/status/1904272318727156181

³https://web.archive.org/web/20250324221942/https://twitter.com/goonboss_/status/1904297097706291381

⁴https://web.archive.org/web/20250324191902/https://twitter.com/goonboss_/status/1904251628271579175

⁵ https://web.archive.org/web/20250324224532/https://twitter.com/goonboss_/status/1904303598407909855

⁶ https://web.archive.org/web/20250325192818/https://twitter.com/goonboss_/status/1904616350187745304

⁷ https://web.archive.org/web/20250325174902/https://twitter.com/goonboss_/status/1904591367176597709

3/28/25	When gay Mormons soak it's called mudding ⁸	9
3/28/25	The cure for depression is going to the gym and befriending the biggest, blackest dude there ⁹	10
3/30/25	New York is literally the epicenter of femininity and weakness. Even the slightest display of aggression can land you a great job or hot girlfriend ¹⁰	11
3/31/25	MFs will vape and rail lines of coke and then complain about seed oils. Shit pisses me off, u about to seed-dis dick crammed down your throat ¹¹	12
3/31/25	Nex time you're on a date, encourage the chick to get a strong cocktail and then order a sparkling water for yourself. Make her feel bad for being a dumb alcoholic: self esteem will drop and so will her pants. ¹²	13
3/31/25	If you are in med school but still a virgin, it's time to switch to gynecology. Game is game. ¹³	14
4/3/25	@JohnBummit Is it worse being retarded or 3% black? ¹⁴	15
4/3/25	@biggritsmcgee Untrue [Retweet of a post saying "Gay is okay!"] ¹⁵	16
4/4/25	@JMan_316 Which gym do your daughters use btw? [Retweet of a post about taking pictures of women in the gym without their knowledge] ¹⁶	17
4/4/25	Best places to goon: -childhood bedroom -outside ex's place (bush or tree) -Whole Foods bathroom -Aunt's foot -Triple XS diabetic tube sock	18

⁸ https://web.archive.org/web/20250328171400/https://twitter.com/goonboss_/status/1905669715579515189

⁹ https://web.archive.org/web/20250328062948/https://twitter.com/goonboss_/status/1905507597802741886

¹⁰ https://web.archive.org/web/20250331004631/https://twitter.com/goonboss_/status/1906508370892177601

¹¹ https://web.archive.org/web/20250331210538/https://twitter.com/goonboss_/status/1906815173676974229

¹² https://web.archive.org/web/20250331214911/https://twitter.com/goonboss_/status/1906826130041995597

¹³ https://web.archive.org/web/20250331230353/https://twitter.com/goonboss_/status/1906844929902477501

¹⁴ https://web.archive.org/web/20250403044438/https://twitter.com/goonboss_/status/1907655459948957755

¹⁵ https://web.archive.org/web/20250403223009/https://twitter.com/goonboss_/status/1907923603737424126

¹⁶ https://web.archive.org/web/20250404202005/https://twitter.com/goonboss_/status/1908253258310730034

	-investor meeting -DMV license update pic ¹⁷	
4/5/25	Lowkey gay as a man to like another man's voice, like bro you're literally swooning over another man's mating call ¹⁸	19
4/13/25	If you insult me, I'm insulting you back. If you insult me and run away, I'm chasing you down and fucking you. ¹⁹	20

Lefkowitz's observations corroborate that these tweets reflect Spector; for example, Lefkowitz observed Spector appear to get women drunk so Spector could have sex with them. (Ex. 2 at ¶7). Nor can Spector escape his public association with the "Murray Hill Guy" account, engaging in largely sexual banter. (Ex. 2 at ¶¶9, 13-14; **Composite Exhibit 21**). For example, on July 8, 2025, Plaintiff prompted "Murray Hill Guy" to make certain posts to grow the account and have him "lead a movement that takes down bitches like the opposite of those anti-men female Facebook groups" (Ex. 2 at ¶¶ 9-10; **Exhibit 22**). Yet Spector thinks that the Defendants impugned his character.

2.0 LEGAL STANDARD

Under CPLR 3211(a)(7), a plaintiff's pleadings are "afforded a liberal construction[.]" *Goshen v. Mut. Life Ins. Co.*, 98 NY2d 314, 326 (2002) (cleaned up). However, where evidence that may be considered under CPLR 3211(a)(1) utterly refutes the factual allegations, defenses may be conclusively established as a matter of law. *See id.*

New York's Anti-SLAPP statute mandates dismissal if the defendant demonstrates the suit involves public participation, unless the plaintiff shows their claims have a "substantial basis in law." CPLR 3211(g). This requires the plaintiff submit "such relevant proof as a reasonable mind

¹⁷ https://web.archive.org/web/20250404153752/https://twitter.com/goonboss_/status/1908182238266536166

¹⁸ https://web.archive.org/web/20250405151218/https://twitter.com/goonboss_/status/1908538192724185135

¹⁹ https://web.archive.org/web/20250413210604/https://twitter.com/goonboss_/status/1911526322070827046

may accept as adequate to support a conclusion or ultimate fact.” *Reeves v. Associated Newspapers, Ltd.*, 218 NYS3d 19, 22 (1st Dept. 2024), *leave to appeal dismissed*, 44 NY3d 990 (2025) (internal citations omitted). Thus, unlike an ordinary motion to dismiss, a “court reviewing the sufficiency of a pleading under CPLR 3211(g) must look beyond the face of the pleadings to determine whether the claim alleged is supported by substantial evidence.” *Id.* at 30.

3.0 ARGUMENT

Spector asserts causes 1 & 2 (defamation), 5 (intentional infliction of emotional distress), 7 (negligence), and 9 (negligent infliction of emotional distress) against Lefkowitz. (**Ex. 1**). None of these causes of action have merit and all arise from Lefkowitz’s alleged communications in a public forum in connection with an issue of public interest. The other causes of action are against the Doe defendants and repeat the allegations and, to the extent hypothetically actionable against Lefkowitz, fail for the same reasons.

3.1 Plaintiff’s Complaint is Subject to the Anti-SLAPP Law

Under the Anti-SLAPP law, the term “public petition and participation” applies to “any communication in a place open to the public or a public forum in connection with an issue of public interest.” CVR § 76-a(1)(a)(1). To protect public participation, “public interest” is broadly construed to embrace “matters of political, social, or other concern to the community.” *Reeves*, 218 NYS3d at 27 (internal citations omitted).

Social media sites, like X/Twitter, are open to the public and/or are a public forum. *See, e.g., Ctr. for Med. Progress v. Planned Parenthood*, 551 F Supp. 3d 320, 332 (S.D.N.Y. 2021) (deeming Twitter “open to the public” under CVR § 76-a(1)(a)); *Collectors Emporium v. Cernera*, No. 607917/2025, 2025 N.Y. Misc. LEXIS 8156, at *14 (Sup. Ct. Nassau Cty. Oct. 7, 2025) (“Under its plain meaning, the term ‘public forum’ has evolved to include, inter alia, Facebook... Twitter...as well as Internet forums ...”); *Coleman v. Grand*, 523 F Supp 3d 244 (E.D.N.Y. 2021),

aff'd, 158 F4th 132 (2d Cir. 2025) (“Facebook is a public forum within the meaning of New York’s Anti-SLAPP law...”); *Packingham v. North Carolina*, 582 US 98, 99 (2017) (social networking is the “modern public square”).

The statements were on matters of public concern. New York courts have an “extremely broad interpretation of statements on matters of public concern, which likewise receive heightened protections. New York law considers a matter of public concern as a dispute that in fact has received public attention because its ramifications will be felt by persons who are not direct participants. This includes a matter of political, social, or other concern to the community, even if it does not affect the general population.” *Coleman v. Grand*, 523 F Supp 3d at 259 (cleaned up). “Human interest items may be matters of public concern if reasonably related to matters warranting public exposition.” *Lewis v. Newsday, Inc.*, 246 AD2d 434 (1st Dept. 1998) (cleaned up). Certainly, the identity of the operator of “Murray Hill Guy” was of sufficient public concern that the public even cared. And statements that Plaintiff was a “creep,” “rapist,” “confirmed sex offender,” and/or a sexual predator are a matter of public concern. *See Coleman, supra* at 259-60 (deeming allegations of sexual impropriety to be matters of public concern); *Zeitlin v. Cohan*, 2022 NY Slip Op 32878(U), 6-7 (Sup. Ct. N.Y. Cty. Aug. 24, 2022) (same); *Talbert v. Tynes*, 2025 NYLJ LEXIS 2599 (Sup. Ct. N.Y. Cty. Jul. 30, 2025) *aff'd*, 2026 N.Y. App. Div. LEXIS 1571 (1st Dept. Mar. 17, 2026) (same); *Goldman v. Reddington*, 2021 US Dist. LEXIS 78103, at *12 (E.D.N.Y. Apr. 21, 2021)(same). “Alleged communications of sexual harassment are absolutely matters of public concern and interest.” *Balliet v. Kottamasu*, 76 Misc 3d 906, 921-22 (Civ. Ct. Kings Cty. Aug. 9, 2022); *see also Fredin v. Middlecamp*, 500 F Supp 3d 752, 777 (D. Minn. 2020) (“The overall subject of the statement—sexual harassment and rape—is a topic of public interest to society at large, rather than simply a matter of private concern.”)

Further, the “Murray Hill Guy” persona was a community-wide phenomenon, involving debates over digital ethics, harassment, and the anonymity of influential social media accounts. The “unmasking” of such an account is a matter of intense public debate within the relevant community. *Compare Waldbaum v. Fairchild Publ'ns*, 627 F2d 1287, 1297 (D.C. Cir. 1980) (“If the issue was being debated publicly and if it had foreseeable and substantial ramifications for nonparticipants, it was a public controversy.”) And Plaintiff himself, by engaging and encouraging “Murray Hill Guy” (Ex. 2 at ¶¶ 4-5, 9-10, 20; Exhibits 21, 22, & 23) participated in the discussion and directed the attention to himself. *Compare James v. Gannett Co.*, 40 NY2d 415, 422 (1976) (“The essential element underlying the category of public figures is that the publicized person has taken an affirmative step to attract public attention.”)

In a SLAPP suit, the plaintiff bears the burden of demonstrating a substantial legal basis for his claim. CPLR 3211(g); *Reeves*, 218 NYS3d at 22. Where, as here, a movant has demonstrated that a claim involves public petition and participation, as defined in CVR § 76-a(l)(a), a motion to dismiss “shall be granted unless the [plaintiff] demonstrates that the cause of action has a substantial basis in law or is supported by a substantial argument for an extension, modification or reversal of existing law.” CPLR 3211(g). As described another way:

CPLR 3211(g) flipped the burden of proof on the ultimate dispositive merits; “it provided that the party moving for dismissal need not establish a dispositive procedural or substantive defense on the merits of the action, as otherwise required under other provisions of CPLR 3211, but rather, need only establish that the true nature of the action is one within the scope of anti-SLAPP. The actual burden of proof as to the action’s meritoriousness is thereupon shifted in the context of anti-SLAPP immediately to the plaintiff, which is unique.”

Saadi Ouaz v. Crumiller P.C., 2025 NY Slip Op 31024(U), at 2–3 (Sup. Ct. Kings Cnty. Mar. 21, 2025) (quoting *VIP Pet Grooming Studio, Inc. v. Sproule*, 203 NYS3d 681 (2d Dept. 2024)); *see also Jacobus v. Trump*, 51 NYS3d 330, 337 (Sup. Ct. N.Y. Cty. Jan. 9, 2017), *aff’d*, 64 NYS3d

889 (2017) (“The plaintiff bears the burden of proving that in the context of the entire communication a disputed statement is not protected opinion.”) (cleaned up); *Gillespie v. Kling*, 217 AD3d 566 (1st Dept. 2023) (dismissal in an Anti-SLAPP case was proper because the plaintiff failed to demonstrate that defendant’s statements were false or made with knowledge of their falsity or with reckless disregard of whether they were false when proffering only a conclusory and self-serving affidavit); *Talbert, supra* (tweets calling the plaintiff a stalker, abusive, and manipulative were subject to the Anti-SLAPP law). Plaintiff cannot meet this burden. None of the claims have a substantial basis in law nor is there any argument, let alone a substantial one, for the extension, modification, or reversal of existing law.

3.2 The Defamation Claims are Meritless

Plaintiff’s first two causes of action sound in defamation. The elements of defamation are “a false statement, published without privilege or authorization to a third party, constituting fault as judged by, at a minimum, a negligence standard and it must either cause special harm or constitute defamation *per se*”. See *Salvatore v. Kumar*, 45 AD3d 560, 563 (1st Dept. 2007), *lv denied* 10 NY3d 703 (2008), quoting *Dillon v City of New York*, 261 AD2d 34, 38 (1st Dept. 1999). “Whether particular words are defamatory presents a legal question to be resolved by the court in the first instance ... and if not reasonably susceptible of a defamatory meaning, they are not actionable and cannot be made so by a strained or artificial construction.” *Golub v. Enquirer/Star Grp.*, 89 NY2d 1074, 1076 (1997) quoting *Aronson v. Wiersma*, 65 NY2d 592, 593-94 (1985). To constitute defamation *per se*, “the statement must reflect on her performance or be incompatible with the proper conduct of her business.” *Id.*

A defamation action cannot be maintained unless premised on published assertions of fact. See *Brian v. Richardson*, 87 NY2d 46, 51 (1995). “[A] pure opinion cannot be the subject of a defamation claim[.]” *Davis v. Boenheim*, 24 NY3d 262, 269 (2014). Courts evaluate whether a

statement is fact or opinion by determining what the average person hearing or reading the communication would take it to mean. *See id.* at 269 (citing *Steinhilber v. Alphonse*, 68 NY2d 283, 290 (1986)). The three relevant factors are: whether the language has a precise and readily understood meaning; whether it is capable of being proven true or false; and whether the full context, including the broader social context, signals that it is likely opinion. *Id.* at 270. The third “lends both depth and difficulty to the analysis” and requires courts take a “holistic approach,” considering the content of the communication as a whole, its tone, and its apparent purpose, rather than isolating and identifying assertions of fact. *Id.* (internal citations omitted).

Context is especially significant when evaluating online communications, where informal tone and hyperbole are common, and readers are less likely to interpret statements as factual. *See Sandals Resorts Int’l Ltd. v. Google, Inc.*, 925 NYS2d 407, 415 (1st Dept. 2011) (“The culture of Internet communications, as distinct from that of print media such as newspapers and magazines, has been characterized as encouraging a ‘freewheeling, anything-goes writing style.’”) (internal citations omitted); *Rosa v. Eaton*, 2024 US Dist LEXIS 112753, at *10 (S.D.N.Y. June 25, 2024) (statements asserting plaintiffs were “predators” were non-actionable opinion because they were posted to Instagram, which is “typically regarded as fora for stating opinions”). Twitter in particular is a forum in which participants engage in “prolonged hyperbolic crossfire”, strongly signaling to reasonable readers that statements are opinions or mere hyperbole. *Ganske v. Mensch*, 480 F Supp 3d 542, 545 & 553 (S.D.N.Y. 2020) (“If the Internet is akin to the Wild West, as many have suggested, Twitter is, perhaps, the shooting gallery, where verbal gunslingsers engage in prolonged hyperbolic crossfire.”); *see also, Talbert v. Tynes*, Case No. 2025-05058, 2026 NY Slip Op 01478, 1 (1st Dept. Mar. 17, 2026) (tweets were “emotionally charged reactions written in

Twitter’s vernacular and accompanied by rhetoric, signaling that they were nonactionable opinion.”)

Thus, online insults and name calling are nonactionable opinion. *See, e.g., Miller v. James*, 751 F Supp 3d 21, 39 (N.D.N.Y. 2024), *aff’d*, No. 24-2785, 2025 US App LEXIS 8329 (2d Cir. Apr. 9, 2025) (although “terrorist” is defined by the criminal code, even when used by the Attorney General at a press conference it may have multiple meanings and is non-actionable); *Springer v. Almontaser*, 904 N.Y.S. 2d 765, 767 (2d Dept. 2010) (statement that defendant “stalked and harassed” was non-actionable opinion); *Schwartz v. Nordstrom, Inc.*, 553 NYS2d 684, 685 (1st Dept. 1990) (“Nazi” was non-actionable); *Small Bus. Bodyguard Inc. v. House of Moxie, Inc.*, 230 F Supp 3d 290, 312 (S.D.N.Y. 2017) (finding “engaged in extortion, manipulation, fraud, and deceit” is a “a vague statement” and non-actionable); *Chau v. Lewis*, 771 F3d 118, 129 (2d Cir. 2014) (the epithets “sucker,” “fool,” “frontman,” “industrial waste,” “pilot[]” of the “ship of doom,” and “crooks or morons” are hyperbole and therefore non-actionable opinion); *Egiazaryan v. Zalmayev*, 880 F Supp 2d 494, 507-08 (S.D.N.Y. 2012) (“anti-Semitic and antiAmerican” in a “hyperbole-laden opinion piece” are non-actionable).

3.2.1 Defamation *Per Se* is Nonactionable

The Second Cause of Action consists of nothing but non-actionable opinion and hyperbole. Lefkowitz allegedly “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.” (Ex. 1 at ¶45). A statement is defamatory *per se* only where the alleged statement (1) accuses the plaintiff of a serious crime, (2) claims the plaintiff has a loathsome disease, or (3) tends to injure the plaintiff in her trade, business, or profession. *See*

Lieberman v Gelstein, 80 NY2d 429, 435 (1992). None of these statements approach *per se* defamation except, perhaps, “rapist,” but even this is not a statement of fact, it is invective:



Exhibit 24; Wolman Affirm. at ¶29. And to the extent Lefkowitz is not alleged, himself, to have published those statements, he cannot be held liable for them.²⁰ For this reason alone, the Second Cause can be dismissed.

Publishing a photograph with the caption “Bitches love an alpha male. Murray Hill Fitness coming soon.” (Ex. 1 at ¶46) is nothing but mockery. Plaintiff makes a conclusory allegation that it means something else in context, without evidencing that alleged context, leaving it a naked

²⁰ To the extent Plaintiff is alleging ratification or amplification based on a retweet, liability is precluded under Section 230 of the Communications Decency Act, 47 U.S.C. § 230. *See, e.g., Banaian v. Bascom*, 175 NH 151 (2022)(highlighting that not only is Twitter protected from liability for third party statements, users who retweet other users are immunized from liability.)

opinion. Even in the context that Plaintiff is a sexual predator, calling him an “alpha male” and mocking his physique is not a statement of fact.

Additionally, such statements, when made on Twitter, are not actionable in defamation. Recently, the First Department held that a tweet about a Plaintiff stating “that man has harmed multiple women and is abusive and manipulative but congratulations on his dissertation, I guess” was, in Twitter vernacular, a nonactionable opinion. *Talbert v. Tynes*, 2026 NY Slip Op 01478, 1 (1st Dept. 2026). Just as the *Talbert* plaintiff could not recover for being called “abusive and manipulative,” Spector cannot recover for similar invective. This is especially where Spector’s own tweets show that he is a creep, a rapist, a confirmed sex offender, and a sexual predator. He advocates for masturbating outside an ex-girlfriend’s window or on his aunt’s foot—creepy and predatory. He advocates for getting a girl drunk on a strong cocktail, while he stays sober, to have sex with her. That is rape and a sex offense. A reasonable observer of Spector’s own speech about himself would naturally form the opinion that he is creepy, predatory, a rapist, and a sex offender. Thus, the Second Cause of Action is not actionable.

3.2.1.1 Plaintiff Failed to Specifically Plead the Alleged Defamation

CPLR 3016(a) requires the alleged false and defamatory words be specified with particularity in the complaint. “The complaint also must allege the time, place and manner of the false statement and specify to whom it was made.” *Dillon v. City of N.Y.*, 261 AD2d 34, 38 (1st Dept. 1999). For failure to plead these specifics, Plaintiff’s complaint fails.

Moreover, conclusory allegations made “upon information and belief” do not defeat a motion to dismiss. *See, e.g., Mandarin Trading Ltd. v Wildenstein*, 17 Misc 3d 1118[A], 2007 NY Slip Op 52059[U], *5 (Sup Ct., N.Y. Cty. 2007), *aff’d*, 65 AD3d 448 (1st Dept. 2009) (allegation based upon information and belief “is simply a conclusory claim or statement unsupported by factual evidence,” and, “the bald allegation is not entitled to preferential consideration” on a

motion to dismiss); *Belco Petroleum Corp. v AIG Oil Rig*, 164 AD2d 583, 598-599 (1st Dept. 1991) (dismissing claim where allegations were made “on information and belief” and plaintiff failed “to disclose the sources of its information and belief and otherwise come forward with whatever evidence it has of the” allegations). Plaintiff’s pleading defects are fatal.

3.2.1.2 The Statements Were Not Made with Actual Malice

In addition to proving all other necessary elements, a plaintiff in an Anti-SLAPP action must establish the statements were made with “actual malice,” which means that the defendant knew the statements were false or acted with reckless disregard for the truth. CVR § 76-a(2); *see also Zeitlin v. Cohan*, 220 AD3d 631, 632 (1st Dept. 2023). Actual malice is only found where there has been a “purposeful avoidance of truth,” a “high degree of awareness of ... probable falsity,” or the defendant “entertained serious doubts as to the truth of his publication.” *Harte-Hanks Commc’ns, Inc. v. Connaughton*, 491 US 657, 667 (1989) (citing *Garrison v. Louisiana*, 379 US 64, 74 (1964); *St. Amant v. Thompson*, 390 US 727 (1968)). “Actual malice is measured by what defendant actually believed, and not by whether reasonably prudent person would have published the communication or would have investigated it before publishing.” *InkMango, Inc. v. Warren*, 221 NYS3d 922, 926 (Sup. Ct. N.Y. Cty. 2024), *aff’d*, No. 152802/24 (1st Dept. Nov. 18, 2025) (citing *Goldblatt v Seaman*, 225 AD2d 585 (2d Dept. 1996)). Thus, the “actual malice” standard is not satisfied merely through showing ill will. *Id.* (citing *Harte-Hanks, supra* at 666). There must be sufficient evidence to permit the conclusion that the defendant in fact entertained serious doubts as to the truth of their publication. *Id.* (citing *St. Amant, supra* at 731; *Satanic Temple, Inc. v. Newsweek Mag. LLC*, 774 F Supp3d 688, 703 (S.D.N.Y. 2025) (quoting *Lieberman v. Gelstein*, 80 NY2d 429, 439 (1992) (“[T]here is a critical difference between not knowing whether something is true and being highly aware that it is probably false. Only the latter establishes reckless disregard in a defamation action.”)). Finally, it violates the First Amendment

if actual malice is not proven by clear and convincing evidence. *See Mahoney v. Adirondack Pub. Co.*, 71 NY2d 31, 39 (1987) (citing *Bose Corp. v. Consumers Union*, 466 US 485, 511 n. 30 (1984)).

Where a plaintiff's proof of actual malice rests largely on his own self-serving statements, it improper for a court to find they have met their burden. *See Zeitlin*, 197 NYS3d at 213 (“We also reject plaintiff’s allegations of actual malice...[which] rest largely on his own statements.”); *InkMango*, 2024 NY Slip Op 51533(U), 4-5 (“Therefore, plaintiff has failed to allege by clear and convincing evidence that defendants knowingly lied or purposefully avoided the truth.”). Spector offers nothing to suggest Lefkowitz had any doubts about the truthfulness of Plaintiff’s alleged sexual misconduct or knew that it was false. In fact, Lefkowitz read the “Goonboss_” account and observed Spector’s conduct with women – he has no doubt that every opinion or statement everyone said about him in this complaint is not just true, but somewhat downplays the truth.

Notably, anyone who knew Spector would think that he really *was* a creep or a sexual predator. One need only look at his tweets about “gooning” or black men, immigrants, or the mentally disabled, or about degrading women in order to sleep with them. “Gooning” (prolonged masturbation) outside one’s ex’s abode is textbook sexual predation, as would preying on Brazilian women, or photographing someone’s daughter at the gym.

Spector may also fairly be called a “rapist” for encouraging his date to get drunk so she would sleep with him. (Ex. 13). *See, e.g.*, Penal Law § 130.00(6) (“‘Mentally incapacitated’ means that a person is rendered temporarily incapable of appraising or controlling his conduct owing to the influence of a narcotic or intoxicating substance administered to him without his consent, or to any other act committed upon him without his consent.”); *see also State v. Massey*, 476 P3d 420 (Kan. Ct. App. 2020) (even apparent kissing back by inebriated victim did not invalidate rape conviction); *Commonwealth v. Blache*, 450 Mass 583, 591-92 (2008). It is not

inaccurate to call Spector a creep, sexual predator, or rapist. He brags about being one. No one could think more negatively about Spector based on anything Lefkowitz said than they would based upon what Spector has said and done. It did not expose him to “*any further* public contempt, ridicule, aversion or disgrace, or evil opinion of him in the minds of right-thinking persons, or deprivation of friendly intercourse in society.” *Dykstra v. St. Martin’s Press LLC*, 2020 NY Slip Op 31813(U), 13 (Sup. Ct. N.Y. Cty. May 19, 2020) (emphasis in original; quotation marks omitted). Any employer knowing he was “@goonboss_” or observing Spector would have a negative view of him and would have fired him. No injury is traceable to Lefkowitz.

3.2.2 Defamation *Per Quod* Does Not Survive Scrutiny

As to the First Cause of Action, Plaintiff essentially alleges that, at some point, Lefkowitz made statements asserting or implying that Spector operated the “Murray Hill Guy” account. (Ex. 1 at ¶37). Once more, this claim fails per *Dillon, supra*, and CPLR 3016(a) for failure to plead the specifics of the statements. However, even if the statements were properly pleaded and were a knowingly false statement of fact, they would not be defamatory. “Whether particular words are defamatory presents a legal question to be resolved by the court in the first instance and if not reasonably susceptible of a defamatory meaning, they are not actionable and cannot be made so by a strained or artificial construction. Generally, a written statement may be defamatory if it tends to expose a person to hatred, contempt or aversion, or to induce an evil or unsavory opinion of him in the minds of a substantial number of the community.” *Golub*, 89 NY2d at 1076. There is nothing inherently defamatory about being called the operator of the “Murray Hill Guy” account. To the contrary, Plaintiff alleges the account had “popularity” and garnered “advertising and brand deals” (Ex. 1 at ¶17) and that it “continued to grow in popularity” (*Id.* at ¶19; *see also* ¶21 (referencing the “growing popularity of the ‘Murray Hill Guy’ account”)). Nothing in the allegations suggest that being known as the operator of the “Murray Hill Guy” account would tend

to expose anyone generally to hatred, contempt, or aversion; it is complimentary, not defamatory. In fact, Spector wanted to be known as “Murray Hill Guy,” publicly claiming he was one of the individuals who operated the account. (Ex. 2 at ¶¶13-14).

Additionally, Plaintiff must show proximate causation of his alleged injuries. *See, e.g., Weiss v. Nolan*, 2014 NY Slip Op 31304(U), 4 (Sup. Ct. N.Y. Cty. May 19, 2014). Proximate causation “traditionally been understood to mean ‘[a] cause that directly produces an event and without which the event would not have occurred’ (Black’s Law Dictionary 213 [7th ed 1999])[.]” *Giuffrida v. Citibank Corp.*, 100 NY2d 72, 80 (2003). Here, beyond merely conclusory statements, Plaintiff fails to allege any facts connecting any of the statements to any alleged harm. Notably, Plaintiff only asserts he lost his job “[o]n or about X date” (Ex. 1 at ¶31)(emphasis added) “due to recent events” (*id.*) none of which are identified as having been due to anything Lefkowitz did. Nor are any other alleged damages shown to have been directly produced by anything Lefkowitz did. They are just as likely caused by Spector’s own postings. For example, on March 24, 2025, published a Tweet “How to masturbate at work without getting caught: a thread 1/27 [thread spool emoji]” (Ex. 3). Or his tweet that “New York is literally the epicenter of femininity and weakness. Even the slightest display of aggression can land you a great job or hot girlfriend” (Ex. 11). Or that one of the best places to “goon” is an “investor meeting” (Ex. 18). Any one of those would have gotten him fired (let alone the racist, homophobic, and misogynist tweets). Absent special damages, a claim of defamation *per quod* cannot proceed.

3.3 The IIED Claim is Improper

Spector claims Lefkowitz said mean things on the Internet, but this is not sufficient for IIED. “[A] cause of action alleging intentional infliction of emotional distress has four elements: (i) extreme and outrageous conduct; (ii) intent to cause, or disregard of a substantial probability of causing, severe emotional distress; (iii) a causal connection between the conduct and injury;

and (iv) severe emotional distress.” *Taggart v. Costabile*, 131 AD3d 243, 249 (2d Dept. 2015) (internal citation and quotation marks omitted). Plaintiff fails to meet these elements.

There is no “extreme” or “outrageous” conduct. To be actionable, the conduct alleged “must consist of more than mere insults, indignities, and annoyances; rather, it must exceed all bounds usually tolerated by decent society.” *Leibowitz v. Bank Leumi Tr. Co.*, 152 AD2d 169, 182 (2d Dept. 1989). Lefkowitz allegedly called Spector his “enemy” (Ex. 1 at ¶68(a)). That is a mere insult and indignity. Lefkowitz allegedly said that Spector would “face a doxx” and would be “destroy[ed]” (Ex. 1 at ¶68(b)). This is merely an annoyance. There is no right to eternal anonymity. Lefkowitz had no duty to protect Spector’s identity. What people try to nefariously call “doxxing” is no different than a modern-day phone book, letting you know who is speaking. Moreover, attempting to punish Lefkowitz for publishing truthful information would violate the First Amendment. *See, e.g., Bartnicki v. Vopper*, 532 US 514, 527-282 (2001). And, since he had a First Amendment right to “doxx,” it follows that saying he *might* “doxx” is similarly protected.

As to allegedly impersonating Spector (Ex. 1 at ¶68(c)), such is a mere indignity; *Saturday Night Live* is replete with impersonators. Neither is portraying Spector as the operator of “Murray Hill Guy” extreme or outrageous (Ex. 1 at ¶68(d)). As Spector admitted, it is a popular account. Nor was Defendant the first—all of this information had previously been published by Luke Buchhagen. (*Id.* at ¶10). And, while there are vague conclusory allegations as to “alleged harassment of women and others” (*Id.* at ¶68(d)), Spector offers no facts to show either that there was such harassment or that being the “Murray Hill Guy” would have associated him with such harassment. As for “participating in, causing, and/or amplifying” the alleged doxxing (Ex. 1 at ¶68(e)), actual doxxing is not actionable and it is First Amendment-protected speech, as noted

above, and the Complaint conspicuously omits saying what Lefkowitz is alleged to have done. Further, to the extent it consists of retweets, such is protected under 47 U.S.C. § 230.

With respect to the photograph and “Bitches love an alpha male. Murray Hill Fitness coming soon” claim (Ex. 1 at ¶68(f)), once again, this is a mere insult of Plaintiff’s physique. While Plaintiff asserts it somehow capitalized on other narratives, Plaintiff offers no facts to demonstrate this. Taunting Plaintiff (Ex. 1 at ¶68(g)) in a tweet that was only online for approximately 30 minutes (Ex. 2 at ¶34) is, again, a mere insult and indignity that is not actionable.

Further, the allegations of Ex. 1 at ¶¶68(d), (e), and (f), are repetitive of the defamation claims. “[I]t is long settled that publication of a single, purportedly false or defamatory article regarding a person does not constitute extreme and outrageous conduct as a matter of law.” *Bement v. N.Y.P. Holdings, Inc.*, 307 AD2d 86, 92 (1st Dept. 2003); *Smigo v. N.Y.P. Holdings, Inc.*, 2010 NY Slip Op 30556(U), ¶10 (Sup. Ct. N.Y. Cty. Mar. 17, 2010). Moreover, it is not extreme or outrageous to characterize Spector, who promotes masturbating at work, on an aunt’s foot, and outside an ex’s residence, or of getting a girl drunk to have sex with her, as a creep, predator, rapist, or sex offender.

Plaintiff fails to meet the remaining elements. There are only conclusory allegations of intent to harm; to the contrary, Plaintiff highlights that Lefkowitz allegedly thought Plaintiff would “enjoy” it and it would be “good” for him. (Ex. 1 at ¶68(g)). Further, Plaintiff has a significant causation problem—he lost his job, which is his own/the employer’s fault, and others are alleged to have engaged in conduct for which Plaintiff claims the same damages (Sixth Cause of Action). Plaintiff offers no facts that demonstrate proximate causation. As to damages, Plaintiff makes generic allegations of “anxiety, humiliation, fear, mental anguish” and other undisclosed “psychological and emotional injuries” (Ex. 1 at ¶71). Self-diagnosed “stress and anxiety” without

any consultation with a mental health professional and the absence of a formal diagnosis does not rise to the severity required by law. *Navarro v. Fed. Paper Bd. Co.*, 185 AD2d 590, 594 (3d Dept. 1992); *see also Cusimano v. United Health Servs. Hosps., Inc.*, 291 AD3d 1149, 1153 (3d Dept. 2012) (rejecting IIED claim for lack of medical substantiation).

3.4 Lefkowitz was Not Negligent

For his seventh cause of action, Spector claims that Lefkowitz was negligent by allegedly stating or implying that Spector operated the “Murray Hill Guy” account, impersonated Plaintiff, “fostering, amplifying, and participating in the ‘doxxing’” and not correcting allegedly false narratives. (Ex. 1 at ¶84). None of this constitutes negligence.

To claim negligence, “a plaintiff must demonstrate (1) a duty owed by the defendant to the plaintiff, (2) a breach thereof, and (3) injury proximately resulting therefrom. Thus, a threshold issue that the court must resolve is whether the defendant owed a legally recognized duty to the plaintiff.” *Ferreira v. City of Binghamton*, 38 NY3d 298, 308 (2022) (cleaned up). Here, Plaintiff invents a vague duty not to misidentify Plaintiff as the operator of the account, to not disseminate or encourage the lawful dissemination of his identity, and to not expose him to reputational and economic harm. (Ex. 1 at ¶82). These are not duties cognizable under law and, absent duty, there can be no breach or proximate causation. Further, as discussed above, Spector’s own postings are what damaged his reputation—they expose him as a creep, predator, rapist, and sex offender. Even if there were a duty, giving an honest opinion based on Spector’s tweets and behavior is no breach.

Moreover, this is a recast defamation claim. “The facts alleged by plaintiff are, in essence, inseparable from the tort of defamation and, as such, plaintiff is relegated to any remedy that would have been available on that basis.” *Butler v. Del. Otsego Corp.*, 203 AD2d 783, 785 (3d Dept. 1994). The First Department rejects Plaintiff’s attempts: a “defamation cause of action is not transformed into one for negligence merely by casting it as such.” *Sprecher v. Thibodeau*, 148

AD3d 654, 655 (1st Dept. 2017) (cleaned up); *see also Rakofsky v. Wash. Post*, 39 Misc. 3d 1226(A) (Sup. Ct. N.Y. Cty. Apr. 29, 2013). Similarly, as in *Sprecher*, the “negligence claim additionally fails because the alleged false statements were made to third parties, not to plaintiff directly, and plaintiff did not rely on them.” 148 AD3d at 655. Here, Spector is complaining solely about statements to third parties, without reliance by Spector.

3.5 The NIED Claim Cannot Proceed

For his ninth cause, Plaintiff alleges negligent infliction of emotional distress for the statement that Spector operated the “Murray Hill Guy” account, participated in so-called “doxxing”, and associated Plaintiff with the accusations of harassment. (Ex. 1 at ¶¶96-97). This is meritless.

“A cause of action for negligent infliction of emotional distress generally requires [the] plaintiff to show a breach of duty owed to [him or] her which unreasonably endangered [his or] her physical safety, or caused [him or] her to fear for [his or] her own safety.” *A.M.P. v Benjamin*, 201 AD3d 50, 57 (2d Dept. 2021) (citations and internal quotation marks omitted); *see also Goradze v. Itskovich*, 2025 NY Slip Op 34829(U), 10 (Sup. Ct. N.Y. Cty. Dec. 12, 2025). Again, Lefkowitz owed no generalized duty to Spector and, further, Plaintiff’s safety was never in danger and any claimed fear was unreasonable. Nor could there be any breach by Lefkowitz when it was Spector’s own tweets that expose him as a creep, predator, rapist, and sex offender.

Further, “a claim to recover for negligent infliction of emotional distress cannot be asserted where, as here, it is essentially duplicative of other tort causes of action.” *Aykac v. City of N.Y.*, 2022 NY Slip Op 33639(U), 16 (Sup. Ct. N.Y. Cty. Oct. 20, 2022); *see also Reeves*, 232 AD3d at 15-16 (holding that “claims for negligent and intentional infliction of emotional distress were correctly dismissed as duplicative of his defamation claims”).

3.6 Fees Should be Awarded

Because this is a frivolous SLAPP suit with no substantial basis in law and is not supported by a substantial argument for the extension, modification, or reversal of existing law, Lefkowitz is entitled to attorneys' fees and costs for this motion. CPLR 3211(g); CVR § 70-a(1)(a). He may also file a separate action to recover compensatory and punitive damages for the wrongful filing of this lawsuit. *Id.*

4.0 CONCLUSION

This Court should dismiss Plaintiff's Complaint in the entirety, with prejudice, awarding fees and costs under the Anti-SLAPP law.

Dated: March 25, 2026.

/s/ Jay M. Wolman
Jay M. Wolman
jmw@randazza.com
RANDAZZA LEGAL GROUP, PLLC
Office Address:
353 Ocean Avenue, Suite 4E
Brooklyn, NY 11226
Mailing Address:
100 Pearl Street, 14th Floor
Hartford, CT 06103
Tel: 702-420-2001
Fax: 305-437-7662

Marc J. Randazza (*pro hac vice* pending)
ecf@randazza.com
RANDAZZA LEGAL GROUP, PLLC
30 Western Avenue
Gloucester, MA 01930
Tel: 702-420-2001

Attorneys for Defendant

CERTIFICATION OF WORD COUNT

Pursuant to Rule 202.8-b of the Uniform Civil Rules for the Supreme Court I certify that the within Memorandum contains 6,778 words excluding the parts of the document that are exempted by Rule 202.8-(b). This document therefore complies with Rule 202.8-(a) which establishes a word limit of 7000 words. This certificate was prepared in reliance on the word count function of the word processing system (Microsoft Word) used to prepare this document.

Dated: March 25, 2026.

/s/ Jay M. Wolman
Jay M. Wolman

Exhibit 1

Complaint
(NYSCEF Doc. No. 2)

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

-----X
ERIC SPECTOR,

Plaintiff,

VERIFIED COMPLAINT
Index No.:

-against-

ROBERT LEFKOWITZ, JOHN DOE, AND
JANE DOE

Defendants.

-----X

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.
The Ment Law Group, PC
Attorney for the Plaintiff
229 West 36th Street
New York, NY 10018
Telephone: (860) 969-3200
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

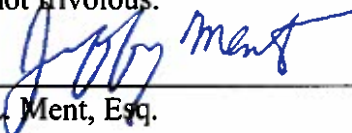
Defendants,

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
ERIC SPECTOR,

Index No.:

**VERIFICATION OF
PLAINTIFF**

Plaintiff,

-against-

ROBERT LEFKOWITZ, JOHN DOE,
AND JANE DOE

Defendants,


-----X

STATE OF CONNECTICUT) SS: Hartford
)
COUNTY OF 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

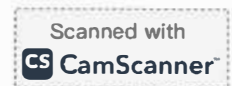


Exhibit 2

Affidavit of Robert Lefkowitz

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

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

AFFIDAVIT OF ROBERT LEFKOWITZ

I, Robert Lefkowitz, hereby declare:

1. I am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty. I have knowledge of the facts set forth herein, and if called as a witness, could and would testify thereto.
2. I am a Defendant in the above-captioned matter.
3. In early 2025, Eric Spector (“Spector”) initially contacted me on the social media platform X (formally Twitter) using the account “@Goonboss_”.
4. Spector and I began messaging through X f/k/a Twitter. *See Composite Exhibit 23*, a true and correct copy of certain direct messages between Spector and myself on that platform.
5. Spector and I moved our conversations to iMessage. *See Composite Exhibit 23*, a true and correct copy of certain direct messages between Spector and myself on that platform.
6. Spector and I eventually began meeting socially in person. These meetings primarily consisted of us attending parties and nightlife venues in New York City.

7. During these in person meetings:
 - a. Spector often displayed intense or aggressive behavior when interacting with others, particularly women;
 - b. several friends of mine (including women) who were present commented that Spector's behavior made them uncomfortable, and they did not enjoy when I brought Spector to social gatherings; and
 - c. at times Spector made explicit sexual comments toward women that caused them to become offended or uncomfortable; and
 - d. I observed Spector getting women drunk so he could have sex with them.
8. When incidents like this would occur, I would distance myself from the situation.

Despite this, I continued interacting with Spector periodically.

9. When Spector and I interacted, Spector would send me content ideas and screenshots related to dating that he thought could be posted on the "Murray Hill Guy" account.

10. For example, on July 8, 2025, Plaintiff prompted me to make certain posts to grow the account and have him "lead a movement that takes down bitches like the opposite of those anti-men female Facebook groups". See **Exhibit 22**, a true and correct copy thereof.

11. Based on my observations, Spector admired the popularity of "Murray Hill Guy" and always tried to become as popular or viral.

12. During this time, our one-on-one interactions were generally not confrontational. We had a fun and engaging friendship.

13. In May 2025, Spector and I attended an event related to the New York social media community.

14. During that event we both jokingly referred to ourselves as "Murray Hill Guy"

when introducing each other. We did this as part of the running joke surrounding the anonymous nature of the account.

15. Spector would frequently claim to be “Murray Hill Guy.”

16. In June 2025 when Spector, his roommate, several friends, and myself were out together socially, Spector began acting aggressively towards people in the venue, particularly when interacting with women.

17. Due to the uncomfortable situation Spector was creating, my friends and I decided to leave the venue.

18. Spector responded very angrily when we left without him.

19. Our relationship became strained following this incident.

20. Later that summer, Spector sent me a screenshot from a dating application and suggested posting it on the “Murray Hill Guy” social media account stating he believed it would be humorous content.

21. I posted the screenshot and it became viral online.

22. The individual in the screenshot later expressed she was upset about the post, and, at Spector’s request, the post was subsequently deleted.

23. Following this viral post, several anonymous social media accounts began posting Spector’s photograph and claiming he was associated with the “Murray Hill Guy” account.

24. These accounts were not controlled by me and were circulated independently.

25. During this time, I was also tagged in posts that included my name, photograph, and sometimes references to my employer.

26. Following these events, Spector began contacting me in a more aggressive manner both in person and over the phone.

27. Several times, Spector stated that if I did not publicly identify myself as the operator of the “Murray Hill Guy” account there would be “consequences.”

28. These conversations occurred during heated arguments and sometimes included joking or sarcastic exchanges.

29. The “Murray Hill Guy” account is a satirical and anonymous social media account. Part of the running joke of this account involved posts implying multiple people ran the account.

30. At all relevant times, Spector knew of and participated in this running joke.

31. Around September 2025, an account named “Degen CPA” began harassing me online by:

- a. posting photographs of me;
- b. tagging my friends in posts;
- c. contacted members of my family;
- d. posted my home address online;
- e. threatened me;
- f. created fabricated messages allegedly from my mother; and
- g. made inappropriate statements.

32. This harassment continued for several months.

33. The individual behind the account appeared to have connections with Spector including online interactions and real-life meetings.

34. As of March 6, 2026, the day I was served this lawsuit, the “Degen CPA” account deleted all X posts directed at me.

35. During the time period Spector claims I allegedly caused him emotional distress:

- a. Spector continued contacting me regularly without any complaint of

emotional distress; and

b. Spector asked to meet socially on several occasions without any accusation I caused him distress.

36. Spector attempts to claim I taunted him (Exhibit 1 at ¶ 68(f)); however, the X post in question was only up for half an hour.

37. At that point I was not comfortable socializing with Spector and began distancing myself.

38. I did not attempt to cause Spector to lose his job.

39. I have no knowledge of the circumstances surrounding Spector’s termination.

40. I have no knowledge that any of my posts contributed to any investigation into Spector by his employer or termination of his employment.

41. My employer was contacted on two occasions regarding the “Murray Hill Guy” account. We discussed the boundaries regarding what contact was appropriate. I was never informed who made those complaints.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 3/25/26

[Signature]
Robert Lefkowitz

On this 25 day of March, 2026, before me, the undersigned notary public, Robert Lefkowitz personally appeared, proved to me through satisfactory evidence of identification, which were ND license, to be the person who signed the preceding or attached document in my presence and who swore or affirmed to me that the contents of the documentary truthful and accurate to the best of his knowledge and belief.

[Signature]
Notary Public




Exhibit 3

@goonboss Tweet
March 24, 2025

Wayback Machine https://twitter.com/goonboss_/status/1904272318727156181 Go FEB 24 MAR 2024 2025 2026 About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#)

 **Goon Lord**
@goonboss_

How to masturbate at work without getting caught: a thread

1/27 🗨️

Mon Mar 24 2025 16:41:15 GMT-0400 (Eastern Daylight Time)

Exhibit 4

@goonboss Tweet

March 24, 2025

Wayback Machine https://twitter.com/goonboss_/status/1904297097706291381 Go FEB 24 MAR 2024 2025 2026 APR About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#)


 **Marvin**
@goonboss_
If you unfollow me I'm coming to your house
Mon Mar 24 2025 18:19:42 GMT-0400 (Eastern Daylight Time)

Exhibit 5

@goonboss Tweet

March 24, 2025

INTERNET ARCHIVE Wayback Machine https://twitter.com/goonboss_/status/1904251628271579175 Go FEB 24 MAR 2024 2025 2026 About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#)

 **Goon Lord**
@goonboss_

Going up to Brazilian women and saying "Hey beautiful, your greencard prince has arrived" wish me luck

Mon Mar 24 2025 15:19:02 GMT-0400 (Eastern Daylight Time)

Exhibit 6

@goonboss Tweet

March 24, 2025

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

 **Marvin**
@goonboss_

Had sex with my son's girlfriend. Thank god she took the pill



Mon Mar 24 2025 18:45:32 GMT-0400 (Eastern Daylight Time)

Exhibit 7

@goonboss Tweet

March 25, 2025

INTERNET ARCHIVE https://twitter.com/goonboss_/status/1904616350187745304 Go FEB 25 MAR APR 2024 2025 2026 About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#)

 **Marvin**
@goonboss_

If you aren't willing to fuck your son's girlfriend, you don't have what it takes to make it in today's world

Tue Mar 25 2025 15:28:18 GMT-0400 (Eastern Daylight Time)

Exhibit 8

@goonboss Tweet

March 25, 2025

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#)



Marvin
@foonboss_

Driving is a Y chromosome activity

Tue Mar 25 2025 13:49:02 GMT-0400 (Eastern Daylight Time)

Exhibit 9

@goonboss Tweet
March 28, 2025

INTERNET ARCHIVE https://twitter.com/goonboss_/status/1905669715579515189 Go FEB 28 MAR APR 2024 2025 2026 About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#)

 **Marvin**
@goonboss_
When gay Mormons soak it's called mudding
Fri Mar 28 2025 13:14:00 GMT-0400 (Eastern Daylight Time)


Exhibit 10

@goonboss Tweet

March 28, 2025

INTERNET ARCHIVE https://twitter.com/goonboss_/status/1905507597802741886 Go FEB 28 APR 2024 2025 2026 About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#)

 **Marvin**
@goonboss_

The cure for depression is going to the gym and befriending the biggest, blackest dude there

Fri Mar 28 2025 02:29:48 GMT-0400 (Eastern Daylight Time)

Exhibit 11

@goonboss Tweet

March 30, 2025

Wayback Machine | https://twitter.com/goonboss_/status/1906508370892177601 | Go | FEB 31 2024 | MAR 2025 | APR 2026 | About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#)

 **Marvin**
@goonboss_

New York is literally the epicenter of femininity and weakness. Even the slightest display of aggression can land you a great job or hot girlfriend

Sun Mar 30 2025 20:46:31 GMT-0400 (Eastern Daylight Time)

Exhibit 12

@goonboss Tweet
March 31, 2025

Internet Archive Wayback Machine https://twitter.com/goonboss_/status/1906815173676974229 Go FEB 31 2024 MAR 2025 APR 2025 About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).



Marvin
@goonboss_

MFs will vape and rail lines of coke and then complain about seed oils. Shit pisses me off, u about to seed-dis dick crammed down your throat

Mon Mar 31 2025 17:05:38 GMT-0400 (Eastern Daylight Time)

Exhibit 13

@goonboss Tweet

March 31, 2025

INTERNET ARCHIVE https://twitter.com/goonboss_/status/1906826130041995597 FEB 31 APR 2024 2025 2026  [1 capture](#) 31 Mar 2025   [About this capture](#)

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#)



Marvin
@goonboss_

Next time you're on a date, encourage the chick to get a strong cocktail and then order a sparkling water for yourself.

Make her feel bad for being a dumb alcoholic: self esteem will drop and so will her pants

Mon Mar 31 2025 17:49:11 GMT-0400 (Eastern Daylight Time)

Exhibit 14


@goonboss Tweet

March 31, 2025

INTERNET ARCHIVE | https://twitter.com/goonboss_/status/1906844929902477501 | Go | FEB 31 | APR | 2024 2025 2026 | About this capture

Wayback Machine | 1 capture | 31 Mar 2025

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).



Marvin
@goonboss_

If you are in med school but still a virgin, it's time to switch to gynecology. Game is game.

Mon Mar 31 2025 19:03:53 GMT-0400 (Eastern Daylight Time)

Exhibit 15

@goonboss Tweet

April 3, 2025

INTERNET ARCHIVE https://twitter.com/goonboss_/status/1907655459948957755 Go **APR 03** 2025

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

 **Marvin**
@goonboss_

@JohnBummit Is it worse being retarded or 3% black?

 **John Bummit, PhD.**
@JohnBummit

I am half first gen btw. My mom pulled up to America and somehow bought two houses off of McDonalds salary and gave birth to a retard.

Thu Apr 03 2025 00:38:23 GMT-0400 (Eastern Daylight Time)

Thu Apr 03 2025 00:44:38 GMT-0400 (Eastern Daylight Time)

Exhibit 16

@goonboss Tweet

April 3, 2025

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).


Marvin
 @foonboss_

@biggritsmcgee Untrue


Sasha "Sweet Grits" Fierce, MBA
 @biggritsmcgee

@foonboss_ Gay is okay!

Thu Apr 03 2025 18:29:50 GMT-0400 (Eastern Daylight Time)

Thu Apr 03 2025 18:30:09 GMT-0400 (Eastern Daylight Time)

Exhibit 17

@goonboss Tweet

April 4, 2025

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

 **Marvin**
@goonboss_

@JMan_316 Which gym do your daughters use btw?

 **J**
@JMan_316

This guy needs to be mass reported. This dude needs serious help. Taking pictures of women in the gym for fun without their knowledge. <https://t.co/ZAeo8CYZxt>

Fri Apr 04 2025 13:17:38 GMT-0400 (Eastern Daylight Time)

Fri Apr 04 2025 16:20:05 GMT-0400 (Eastern Daylight Time)

Exhibit 18

@goonboss Tweet

April 4, 2025

Wayback Machine https://twitter.com/goonboss_/status/1908182238266536166 Go **APR 04** 2025

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

 **Marvin**
@goonboss_

Best places to goon:

- childhood bedroom
- outside ex's place (bush or tree)
- Whole Foods bathroom
- Aunt's foot
- Triple XS diabetic tube sock
- investor meeting
- DMV license update pic

Fri Apr 04 2025 11:37:52 GMT-0400 (Eastern Daylight Time)

Exhibit 19

@goonboss Tweet

April 5, 2025

Wayback Machine | https://twitter.com/goonboss_/status/1908538192724185135 | Go | MAR | APR 05 | MAY | 2024 | 2025 | 2026 | About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#)

 **Marvin**
@goonboss_

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

Sat Apr 05 2025 11:12:18 GMT-0400 (Eastern Daylight Time)

Exhibit 20

@goonboss Tweet

April 13, 2025

Internet Archive Wayback Machine https://twitter.com/goonboss_/status/1911526322070827046 Go MAR APR 13 MAY 2024 2025 2026 About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#)

 **Marvin**
@goonboss_
If you insult me, I'm insulting you back.
If you insult me and run away, I'm chasing you down and fucking you.
Sun Apr 13 2025 17:06:04 GMT-0400 (Eastern Daylight Time)

Exhibit 21

Composite Exhibit Tweets Between Parties

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).



Marvin
@goonboss_

Alcoholics by NYC neighborhood:


East Village: Cries after two beers, drunk texts situationship from last summer

West Village: Cries after two espresso martinis, calls daddy for a cash infusion (just a small 10k)

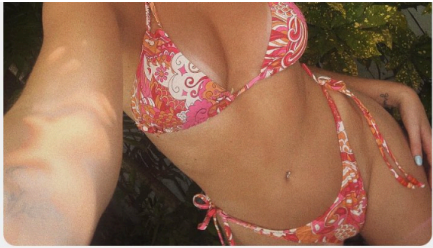
Murray Hill: yells at, beats girlfriend. Then takes her to Nobu

Sun Apr 13 2025 17:13:43 GMT-0400 (Eastern Daylight Time)

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).


 **Marvin**
@goonboss_

@MurrayHillGuy1 Be the reason she deletes hinge forever



My most irrational fear

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

 **Murray Hill Guy**
@MurrayHillGuy1

What's the move chat? <https://t.co/VaT2qsRs5z>

Sun Apr 13 2025 20:23:34 GMT-0400 (Eastern Daylight Time)

Sun Apr 13 2025 20:33:41 GMT-0400 (Eastern Daylight Time)

Internet Archive Wayback Machine https://twitter.com/goonboss_/status/1906810487721099691 Go FEB 31 2025 APR 2025 About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

 **Marvin**
@goonboss_

@MAGAHunter2025 @MurrayHillGuy1 I do too, which is why we need to protect them from misuse (no whales)

 **Johnny Vegas**
Johnr @MAGAHunter2025

@goonboss_ @MurrayHillGuy1 I have no words here....I live for yoga pants.

Mon Mar 31 2025 16:43:19 GMT-0400 (Eastern Daylight Time)

Mon Mar 31 2025 16:47:01 GMT-0400 (Eastern Daylight Time)

Internet Archive Wayback Machine https://twitter.com/goonboss_/status/1906841419051859999 Go  FEB 31 2025 

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).



Marvin
@goonboss_

@realmhillguy They're physical demonstrations, come to my office and I'll show you

 **Real Murray Hill Guy**
@realmhillguy

@goonboss_ Where is part 2 and 26?

Tue Mar 25 2025 15:48:34 GMT-0400 (Eastern Daylight Time)

Mon Mar 31 2025 18:49:56 GMT-0400 (Eastern Daylight Time)

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).



Marvin
@goonboss_

@realmhillguy Grab her phone and check her time spent on insta



Real Murray Hill Guy
@realmhillguy

Co worker said she's too busy to workout this whole week... it's only Monday

Mon Mar 31 2025 17:26:23 GMT-0400 (Eastern Daylight Time)

Mon Mar 31 2025 18:53:52 GMT-0400 (Eastern Daylight Time)

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

 **Marvin**
@goonboss_

@callmelex @MurrayHillGuy1 Are you trans btw?

 **AV**
@callmelex

@MurrayHillGuy1 +

- how do you define respect in a relationship?
- how do you handle difficult convos/moments?
- how do you feel about compromise in a relationship?
- how do you show affection?
- how do you balance your work, personal life, and relationships?

Mon Mar 31 2025 18:20:38 GMT-0400 (Eastern Daylight Time)

Mon Mar 31 2025 19:00:08 GMT-0400 (Eastern Daylight Time)

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).


Marvin
 @goonboss_

@realmhillguy Stop showering and start sitting near her


Real Murray Hill Guy
 @realmhillguy

@goonboss_ She will tell HR on me if when say hello...

(This was overheard in the office)

Mon Mar 31 2025 19:02:46 GMT-0400 (Eastern Daylight Time)

Mon Mar 31 2025 19:10:49 GMT-0400 (Eastern Daylight Time)

Internet Archive Wayback Machine https://twitter.com/goonboss_/status/1906851609423806854 Go  FEB 31 2025 

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).



Marvin
@goonboss_

@ChadJacob256211 @MurrayHillGuy1 Totally agree. But devil's advocate - maybe he was offering to help her be cleaner?



ChadJacob
@ChadJacob256211

@MurrayHillGuy1 You are disgusting

Mon Mar 31 2025 19:27:02 GMT-0400 (Eastern Daylight Time)

Mon Mar 31 2025 19:30:25 GMT-0400 (Eastern Daylight Time)

Internet Archive Wayback Machine https://twitter.com/goonboss_/status/1906854685148913665 Go FEB 31 2025 APR 2025 About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

 **Marvin**
@goonboss_

@realmhillguy She needs to have her pussy sewed up

 **Real Murray Hill Guy**
Real @realmhillguy

@goonboss_ Dude I have been saying this for weeks!

Mon Mar 31 2025 19:16:16 GMT-0400 (Eastern Daylight Time)

Mon Mar 31 2025 19:42:39 GMT-0400 (Eastern Daylight Time)

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

 **Marvin**
@goonboss_

@MurrayHillGuy1 What if she's all of these but her family is loaded and she has daddy issues?

 **Murray Hill Guy**
@MurrayHillGuy1

Automatic block if she...

- Owns more than 1 cat
- Has sleeve tattoo
- Loves the movie Saltburn
- Only does Pilates
- Has a gay best friend
- Follows DegenCPA
- Vegan (but not when drinking)
- Makes over \$150K
- texts in lowercase
- Not close with father
- BMI or age over 24

Tue Apr 01 2025 14:06:11 GMT-0400 (Eastern Daylight Time)

Tue Apr 01 2025 14:10:39 GMT-0400 (Eastern Daylight Time)

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON.](#)

Marvin @goonboss_

@realhillguy These two GOTTA release the tape already

carl marks @lethalrejection · 20m
Texting men who are older but have their autocaps off



Murray Hill Guy @MurrayHillGuy1 · 1m
Automatic block if she...

- Owns more than 1 cat
- Has sleeve tattoo
- Loves the movie Saltburn
- Only does Pilates
- Has a gay best friend
- Follows DegenCPA
- Vegan (but not when drinking)
- Makes over \$150K
- texts in lowercase
- Not close with father
- BMI or age over 24

Real Murray Hill Guy @realhillguy

I swear these two are married this can't be real lol
<https://t.co/wrABG7MBpw>

Tue Apr 01 2025 14:07:44 GMT-0400 (Eastern Daylight Time)

Tue Apr 01 2025 15:44:44 GMT-0400 (Eastern Daylight Time)

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

Marvin
@goonboss_

@MurrayHillGuy1 Beta move. You need to grab her hand and twirl her - Latinas like dominant men

Murray Hill Guy
@MurrayHillGuy1

I just went up to a Latina girl at Whole Foods, didn't say a word, and just showed her this, assuming she doesn't speak English.


She cracked up, was blushing, said she speaks English, and I got her number.

Use any random language. <https://t.co/a0HmzWKTmW>


Tue Apr 01 2025 17:51:02 GMT-0400 (Eastern Daylight Time)

Tue Apr 01 2025 17:55:10 GMT-0400 (Eastern Daylight Time)

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON.](#)

 **Marvin**
@goonboss_

@MurrayHillGuy1 Which neighborhood is filming?

 **Murray Hill Guy**
@MurrayHillGuy1

NYC neighborhood porn category equivalents:

- West Village - Gay
- East Village - Teen
- Murray Hill - Cuckhold
- Upper East - Milf
- Times Square - BBC
- Williamsburg - Midget Scat
- Fidi - Bondage
- Hell's Kitchen - BDSM
- Bushwick - Tranz
- Upper West - Family Roleplay
- Soho - Fingering

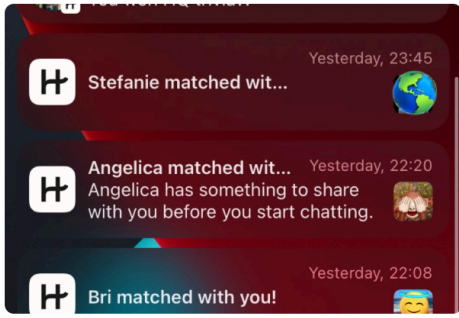
Tue Apr 01 2025 19:31:34 GMT-0400 (Eastern Daylight Time)

Tue Apr 01 2025 19:34:00 GMT-0400 (Eastern Daylight Time)

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

Marvin
@goonboss_

@MurrayHillGuy1 She's not under age, don't freak out. Probably just has aids or something.



Yesterday, 23:45
Stefanie matched wit...

Yesterday, 22:20
Angelica matched wit...
Angelica has something to share with you before you start chatting.

Yesterday, 22:08
Bri matched with you!

< **Angelica** ⚙️

Chat / Profile

Yesterday 16:29

Report

Your reason is private

- I'm not interested in this person
- Profile is fake, spam, or scammer
- Inappropriate content
- Underage or minor
- Off-Hinge behavior
- Someone is in danger

Murray Hill Guy
@MurrayHillGuy1

What the hell could she possible have to share? Tf is this update.

Blocked and reported for underage <https://t.co/YBuJ1pCaQ>

Tue Apr 01 2025 21:00:05 GMT-0400 (Eastern Daylight Time)

Tue Apr 01 2025 21:01:06 GMT-0400 (Eastern Daylight Time)

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

Marvin
@goonboss_

@MurrayHillGuy1 Steal him back ASAP

Murray Hill Guy
@MurrayHillGuy1

Back in 2019, my ex and I rescued a dog together...during our breakup, she kept the dog.

At the dog park today, I SWEAR I saw the dog with some stranger (no ex), and he stared back at me. Our eyes locked for what felt like forever (2 seconds), and it brought back many great

Wed Apr 02 2025 11:52:11 GMT-0400 (Eastern Daylight Time)

Wed Apr 02 2025 11:58:35 GMT-0400 (Eastern Daylight Time)

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

 **Marvin**
@goonboss_

@MurrayHillGuy1 You can find some nice, desperate women AND a delicious meal at the soup kitchen 🍲

 **Murray Hill Guy**
@MurrayHillGuy1

Best places to pick up women in NYC:

- Dog Park
- Solidcore
- Sweetgreen lunch
- Bagel shops Sunday am
- WeWork
- CVS pharmacy
- Wholefoods
- 34th and 3rd st (personal)
- Subway (1/3/4/6)
- Bryant Park
- West side highway
- JFK airport
- Planned Parenthood off Bleecker Street

Wed Apr 02 2025 14:05:47 GMT-0400 (Eastern Daylight Time)

Wed Apr 02 2025 14:07:36 GMT-0400 (Eastern Daylight Time)

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

Marvin
@goonboss_

@MurrayHillGuy1 They hate you because you speak the truth



Murray Hill Guy
@MurrayHillGuy1

It's so sad when these expired women (>24) lash out
<https://t.co/lACo7XTjzx>

Wed Apr 02 2025 17:02:58 GMT-0400 (Eastern Daylight Time)

Wed Apr 02 2025 17:05:19 GMT-0400 (Eastern Daylight Time)

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

 **Marvin**
@goonboss_

@MurrayHillGuy1 No. Never give up on your dreams. Your outcomes follow your efforts.

 **Murray Hill Guy**
@MurrayHillGuy1

You will move to the suburbs.

You will have three kids & 2 dogs.

You will have a vegetable garden.

You will drive a Honda Civic to your desk job.

You will run a 5K with family on Thanksgiving.

You will vacation in Florida twice a year.

You will live an average life.

Wed Apr 02 2025 18:51:03 GMT-0400 (Eastern Daylight Time)

Wed Apr 02 2025 18:56:58 GMT-0400 (Eastern Daylight Time)

Internet Archive | https://twitter.com/goonboss_/status/1907822692184506421 | Go | MAR | APR 03 | MAY | 2024 | 2025 | 2026 | About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

 **Marvin**
@goonboss_

@MurrayHillGuy1 What if you still look young at 30? Could pull early 20s, then

 **Murray Hill Guy**
@MurrayHillGuy1

Here's the most important advice for my younghead followers:

If you can marry a normal girl before 30, do it.

After that, the pickings get slim.


In your 30s, even looking for girls 3-4 years younger, many have lost their mind and bodies by their late 20s.

Thu Apr 03 2025 10:01:01 GMT-0400 (Eastern Daylight Time)


Thu Apr 03 2025 11:49:10 GMT-0400 (Eastern Daylight Time)

Internet Archive Wayback Machine https://twitter.com/goonboss_/status/1907834701806547121 Go | MAR | APR 03 | MAY | 2024 | 2025 | 2026 | About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

 **Marvin**
@goonboss_

@realmhillguy Anyone hit this? Better question is who hasn't

 **Real Murray Hill Guy**
@realmhillguy

Going on a date tonight. Anyone hit this before?
<https://t.co/hmngwWBnOX>

Thu Apr 03 2025 12:35:47 GMT-0400 (Eastern Daylight Time)

Thu Apr 03 2025 12:36:53 GMT-0400 (Eastern Daylight Time)

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON.](#)

Marvin
@goonboss_

@MurrayHillGuy1 Don't know these. I only go to Phoebes

NYC Bar Tier List

S	
A	
B	
C	
D	

Murray Hill Guy
@MurrayHillGuy1

OFFICIAL NYC BAR RANKINGS 🍷🍷 <https://t.co/Pxh6nzY1Mm>

Thu Apr 03 2025 15:16:05 GMT-0400 (Eastern Daylight Time)

Thu Apr 03 2025 15:17:12 GMT-0400 (Eastern Daylight Time)

Internet Archive Wayback Machine https://twitter.com/goonboss_/status/1907875268674596949 1 capture 3 Apr 2025

Go | MAR | APR 03 | MAY | 2024 | 2025 | 2026 | About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

 **Marvin**
@goonboss_

@MurrayHillGuy1 Nearly 30 🤔🤔

 **Murray Hill Guy**
@MurrayHillGuy1

@goonboss_ Say you're under 21 without saying it
Thu Apr 03 2025 15:17:40 GMT-0400 (Eastern Daylight Time)

Thu Apr 03 2025 15:18:05 GMT-0400 (Eastern Daylight Time)

Internet Archive Wayback Machine https://twitter.com/goonboss_/status/190792425772023974 1 capture 3 Apr 2025

Go | MAR | APR 03 | MAY | 2024 | 2025 | 2026 | About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

 **Marvin**
@goonboss_

@MurrayHillGuy1 I love going out with trans girls. Just two bros hanging out.

 **Murray Hill Guy**
@MurrayHillGuy1

New match > cute face > nice body > 5'4 NYC > into sports and fitness > job at big 4 \$ > nice smile > scroll through rest of profile > "I'm trans, hope you're ok with that!"

blocked

Thu Apr 03 2025 18:29:11 GMT-0400 (Eastern Daylight Time)

Thu Apr 03 2025 18:32:45 GMT-0400 (Eastern Daylight Time)

Internet Archive Wayback Machine https://twitter.com/goonboss_/status/1907933974774833165 Go APR 03 2025

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).



Marvin
@goonboss_

@primadonnaleo24 @MurrayHillGuy1 Name checks out.



primadonna leo
@primadonnaleo24

@MurrayHillGuy1 just unmatched her. why be rude, its pretty cool of her to be upfront about it on her profile instead of not telling people at all.

Thu Apr 03 2025 19:10:15 GMT-0400 (Eastern Daylight Time)

Thu Apr 03 2025 19:11:21 GMT-0400 (Eastern Daylight Time)

Wayback Machine https://twitter.com/goonboss_/status/1908269741179121958 Go **APR 04** 2025

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

 **Marvin**
@goonboss_

@MurrayHillGuy1 Shoulda made some pledge suck you off after all that

 **Murray Hill Guy**
@MurrayHillGuy1

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 an Indian chick

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

Fri Apr 04 2025 17:23:22 GMT-0400 (Eastern Daylight Time)

Fri Apr 04 2025 17:25:34 GMT-0400 (Eastern Daylight Time)

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

 **Marvin**
@goonboss_

@MurrayHillGuy1 What if she vapes?

 **Murray Hill Guy**
@MurrayHillGuy1

If her apartment has LED lights, a Stanley cup, no bed frame, and a vision board full of quotes from Pinterest... she's gonna ruin your life, but it'll be fun.

Sun Apr 13 2025 16:58:10 GMT-0400 (Eastern Daylight Time)

Sun Apr 13 2025 17:00:31 GMT-0400 (Eastern Daylight Time)

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON.](#)



Marvin
@goonboss_

@JamesLavery45



Marvin
@goonboss_

I'm just trying to stretch and this chick comes over and completely invades my personal space. Why are gym people so weird? <https://t.co/gUiNSRJSRC>

Sun Apr 13 2025 15:21:56 GMT-0400 (Eastern Daylight Time)

Sun Apr 13 2025 15:22:25 GMT-0400 (Eastern Daylight Time)

Internet Archive Wayback Machine https://twitter.com/goonboss_/status/1911500938562720182 Go | MAR APR 13 MAY | 2024 2025 2026 | About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).



Marvin
@goonboss_

@MurrayHillGuy1 I told her to take a seat



Murray Hill Guy
@MurrayHillGuy1

@goonboss_ Did you ask her to move?

Sun Apr 13 2025 15:24:18 GMT-0400 (Eastern Daylight Time)

Sun Apr 13 2025 15:25:12 GMT-0400 (Eastern Daylight Time)

Internet Archive Wayback Machine https://twitter.com/goonboss_/status/1911524927699640466 Go | MAR 13 APR 13 MAY 2024 2025 2026 About this capture

This is a page generated by the Internet Archive's Wayback Machine from Twitter/X post data. [Display JSON](#).

 **Marvin**
@goonboss_

@MurrayHillGuy1 What if she vapes?

 **Murray Hill Guy**
@MurrayHillGuy1

If her apartment has LED lights, a Stanley cup, no bed frame, and a vision board full of quotes from Pinterest... she's gonna ruin your life, but it'll be fun.

Sun Apr 13 2025 16:58:10 GMT-0400 (Eastern Daylight Time)

Sun Apr 13 2025 17:00:31 GMT-0400 (Eastern Daylight Time)

Exhibit 22

DMs Between Parties

July 8, 2025

13:25



39



Marvin

Unencrypted



Jul 8, 2025

New style post 17:43



@i x.com



F it 17:59

Savage af

You're gonna get more heat, but you might grow a ton from posts like this 18:02

She's famous 18:02

Honestly, we need someone like you to lead a movement that takes down bitches like the opposite of those anti-men female Facebook groups

Oh 18:02

Yeah I know 18:02



Jul 9, 2025

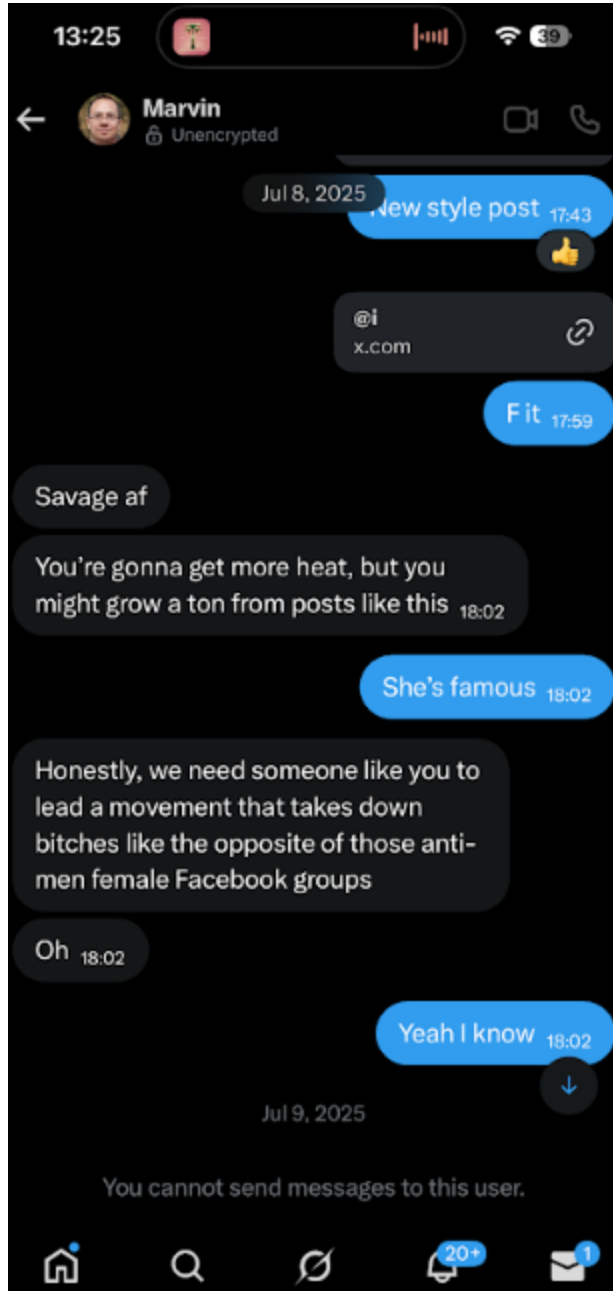
You cannot send messages to this user.



Exhibit 23

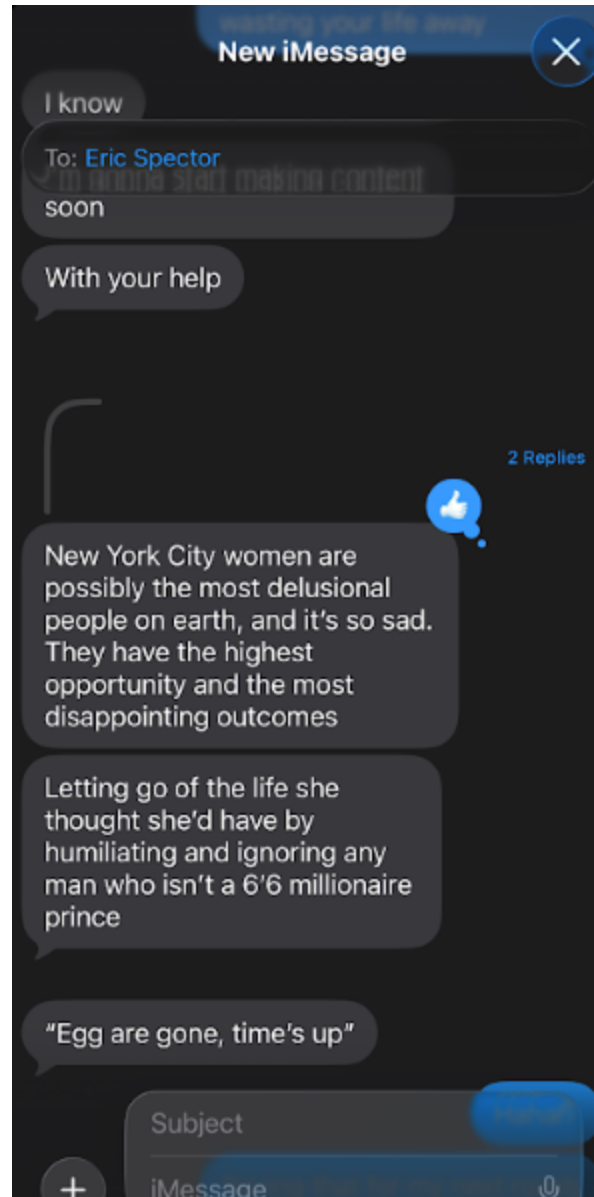
Composite Exhibit DMs Between Parties

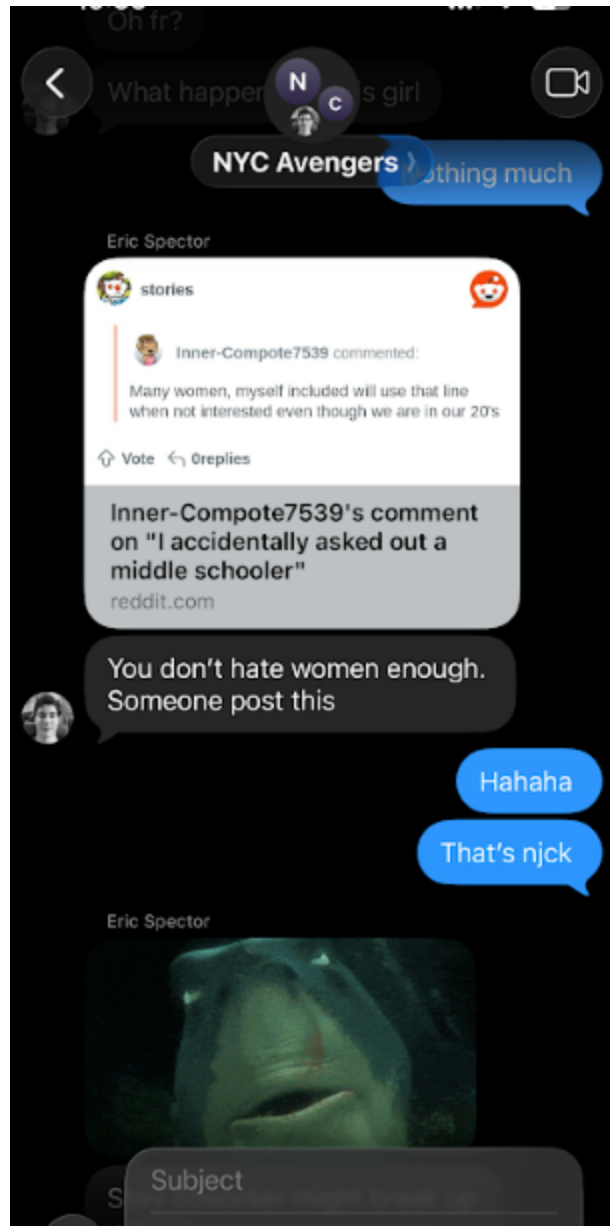


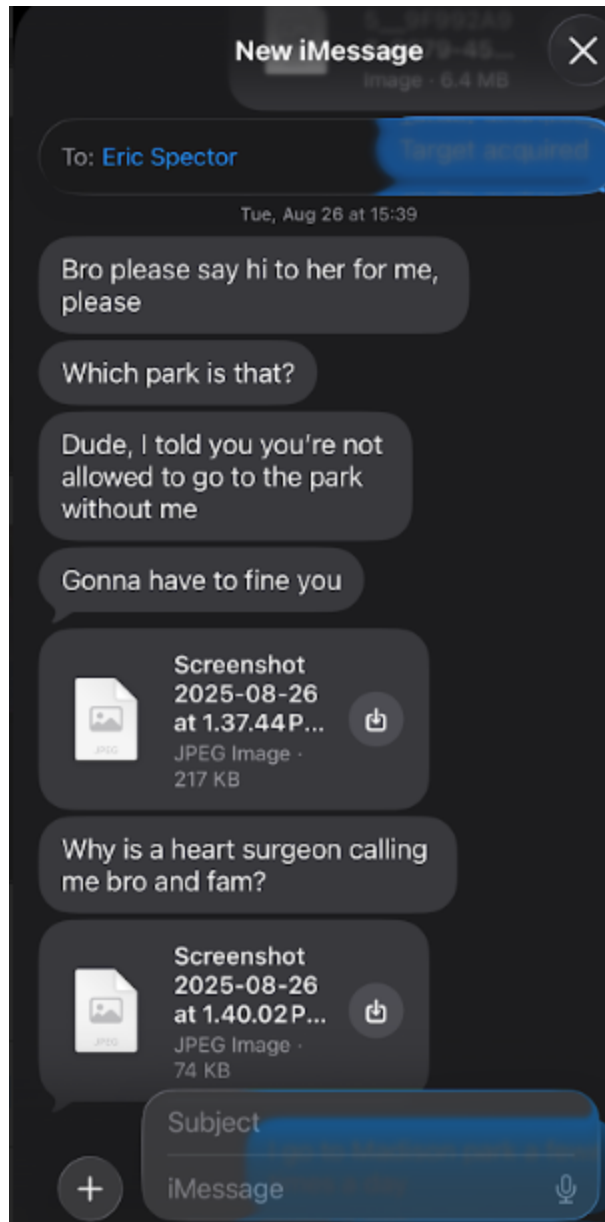


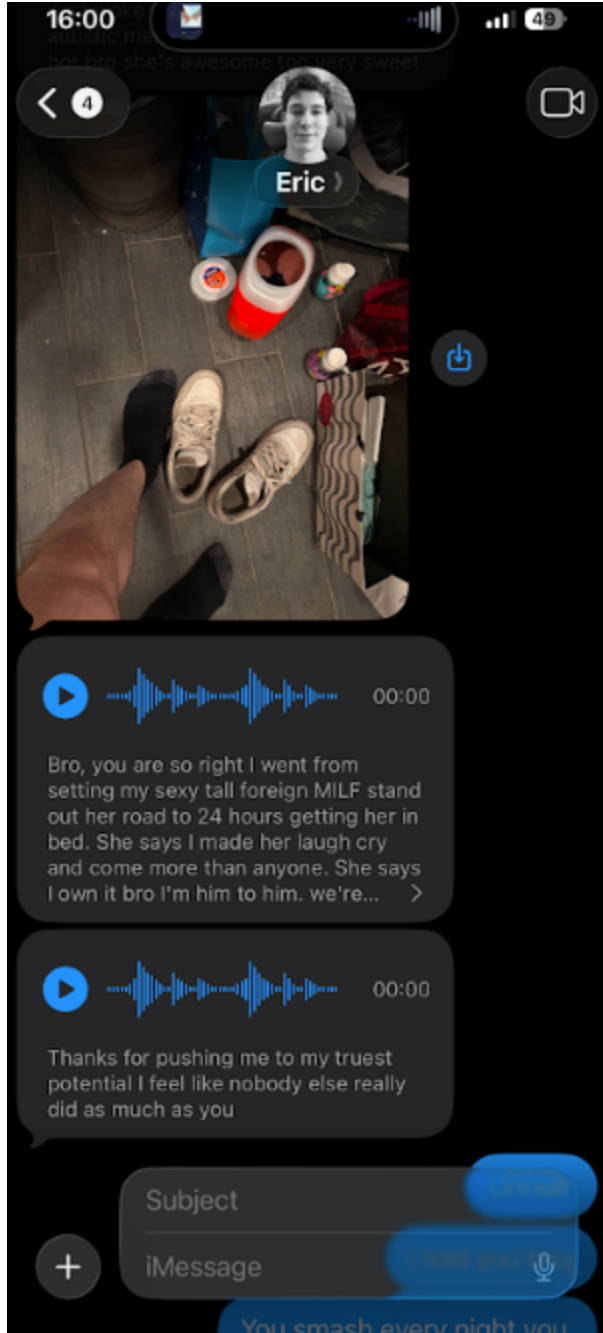


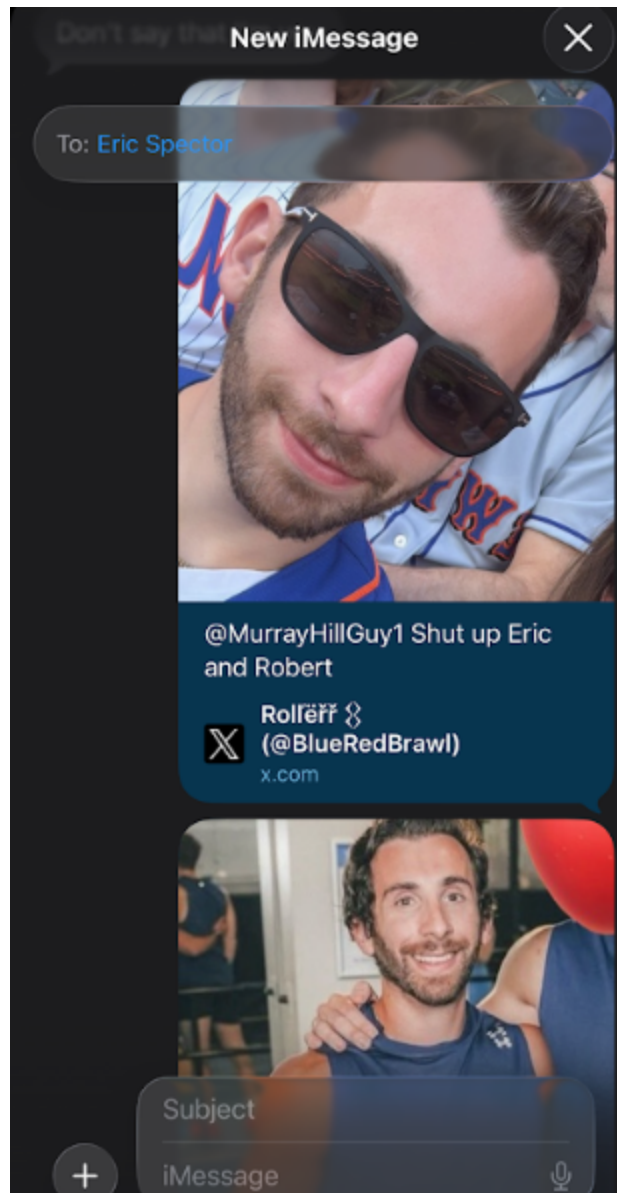














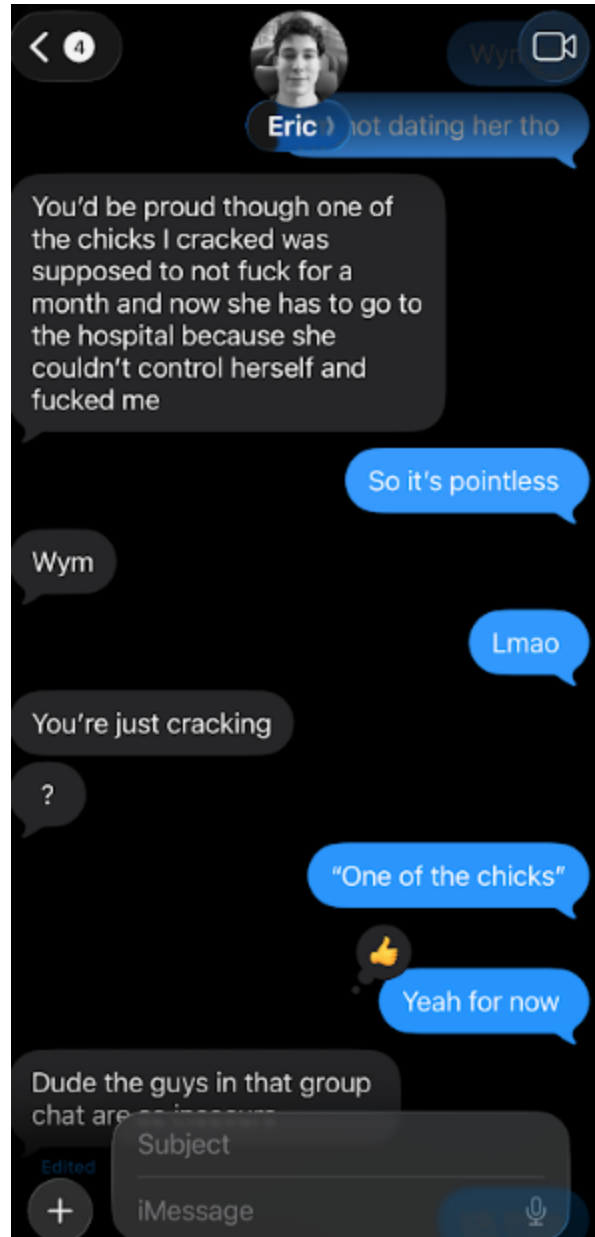


Exhibit 24

@Chucky365787 Tweet

