

August 11, 2023

**VIA FEDERAL EXPRESS**

Mr. Patrick Stoica  
497 Greene Ave, Apt 3  
Brooklyn, NY 11216

Mr. Patrick Stoica  
1383 Mohawk Dr.  
Lawrenceville, GA 30043

**Re: Defamation Against Mission Lane**

Dear Mr. Stoica,

This law firm represents Mission Lane LLC ("Mission Lane"). It has come to Mission Lane's attention that you are intentionally publishing false and misleading information about Mission Lane and certain employees via the website, [linktr.ee/missionlanetruth](http://linktr.ee/missionlanetruth) (the "Website"), and other articles authored by you. While Mission Lane supports fair competition, and even welcomes constructive criticism as it seeks to provide the best possible experience for its customers and employees, it cannot ignore when individuals spread falsehoods about Mission Lane and mislead the public.

Your false and misleading statements, *without any substantiation for such claims*, are causing damage to Mission Lane and to its employees' personal and professional character and cross the line into unlawful and defamatory statements. Under applicable law, it is unlawful to intentionally make untrue statements, whether written or oral, that harm a person's or business's reputation, especially when such statements impute any kind of fraud, dishonesty, misconduct, incapacity, unfitness or want of any necessary qualification in their profession, trade or business. *Martin v Daily News, L.P.*, 2009 N.Y. Misc. LEXIS 3858, 2009 NY Slip Op 31603; *Four Star Stage Light v Merrick*, 56 AD2d 767, 768 (1st Dept 1977). Indeed, courts recognize statements "that tend to injure another in his or her trade, business or profession," constitute defamation per se and are assumed to have caused harm. *Liberman v. Gelstein*, 80 N.Y.2d 429, 434-35 (N.Y. 1992).

Examples of such intentional statements published by you that constitute defamatory or action statements include the following:

Statement #1 – Published Article (published at [deprogramming.substack.com/p/mission-lane-11-years-of-social-washing](https://deprogramming.substack.com/p/mission-lane-11-years-of-social-washing))

You claim “Why does Mission Lane sound like they whiteboard ways to steal from the poor...”

This statement is false and defamatory and made with the clear intention to harm Mission Lane’s reputation. Wording your statement as a question does not change the underlying fact that you accuse Mission Lane of criminal and unlawful activity, without any basis or substantiation. *Davis v. Boenheim*, 998 N.Y.S.2d 131 (2014). Accordingly, your statement is clearly actionable.

Statement #2 – Website ([linktr.ee/missionlanetruth](https://linktr.ee/missionlanetruth))

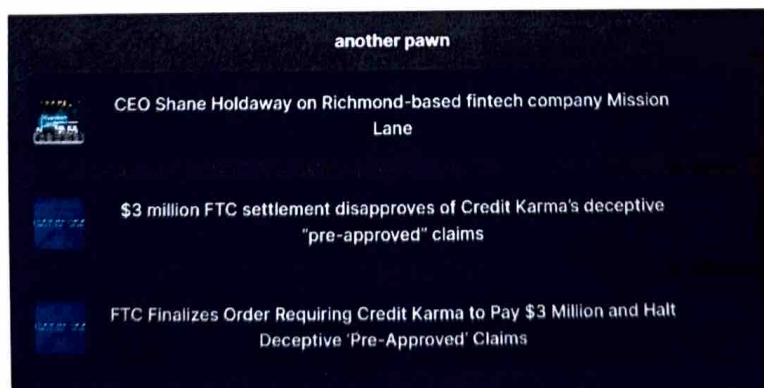
You claim that Mission Lane and Mr. Shane Holdaway are “another pawn”

The above statement is false and defamatory. Your website falsely describes Mission Lane as a part of “fintech scheme” in which you allege “a long lane for 3 shady exits.” Immediately following this information, you refer to “another pawn” and Mission Lane and Mr. Holdaway and clearly imply that Mission Lane and Mr. Holdaway are involved in a purported scheme. You similarly state that “Why does Shane Holdaway avoid the names and origins in interviews” in your article. Your statements falsely imply that Mission Lane and Mr. Holdaway participate in deceptive behavior, and impute fraud, dishonesty, and/or misconduct on Mission Lane and Mr. Holdaway, again without any basis or substantiation. These statements clearly intend to disparage Mission Lane and Mr. Holdaway’s professional reputation, and are clearly actionable.

Statement #3 – Website ([linktr.ee/missionlanetruth](https://linktr.ee/missionlanetruth))

You falsely imply that Mission Lane is responsible for Credit Karma’s FTC Settlement for Pre-Approved Claims

Your website implies that Mission Lane is involved in a purported “fintech scheme.” In your section named “another pawn,” you publish links to a video about Mission Lane followed closely by two articles referring to a matter between the FTC and Credit Karma.



It is clear that you intentionally used the content to mislead a reader into believing that Mission Lane is in some way involved in, or responsible for, the matter between the FTC and Credit Karma. Despite neither of two linked articles in any way mentioning or referring to Mission Lane, nor with any basis or substantiation to do so. Through such misleading attempt at affiliation, you impute misconduct on Mission Lane in an intentional effort to harm Mission Lane's reputation. Such misleading content is also actionable.

Mission Lane takes the protection of its reputation very seriously. It cannot let your false and misleading statements go unchallenged. Accordingly, Mission Lane demands the following:

1. That you remove each of the statements listed above (and any similar statements) from your website, published articles, and any other publications that you have authored;
2. That you provide a full listing of any additional publications made by you that contain the same or similar false and/or misleading statements about Mission Lane and/or its employees, correct such publications, and provide confirmation that such publications have been corrected; and
3. That you immediately cease and forever desist in making any further false and/or misleading statements about Mission Lane and/or its employees.

**You must provide a full response to us within ten (10) days from the date of this letter.** If we do not receive written assurance in that time of your agreement to the above demands, we will have no choice but to escalate the matter. We hope such action will not be necessary and look forward to your full cooperation.

This demand is made without prejudice to any of Mission Lane's rights or claims under applicable law, all of which are hereby expressly reserved.

Sincerely,



Christopher J. Forstner, Esq.