

September 20, 2022

STATEMENT CONCERNING COMPLAINT FILED BY CURTIS JACKSON (p/k/a 50 CENT)

Curtis Jackson, III (p/k/a 50 Cent) is one of the greatest entertainers of the 2000s and is a brilliant businessperson. As such, Mr. Jackson should know that he does not have a valid claim against Angela Kogan or her successful Perfection Plastic Surgery & MedSpa, based in Sunny Isles Beach, Florida.

Mr. Jackson seems to not recall the true underlying facts. To refresh his memory, Mr. Jackson received services from Perfection Plastic Surgery & MedSpa. Mr. Jackson and Ms. Kogan agreed that, instead of Mr. Jackson paying for the services, Mr. Jackson would take a picture with Ms. Kogan that she was permitted to display on her personal and business social media accounts. Witnesses were present when this arrangement was entered into and when the picture was captured.

Ms. Kogan's policy is to not disclose the services that her clients receive, but she affirms that Perfection Plastic Surgery & MedSpa never provided penile enhancement treatment to Mr. Jackson. She has never stated otherwise, either publicly or privately. Instead, Ms. Kogan merely thanked Mr. Jackson for stopping by Perfection Plastic Surgery & MedSpa with social media posts published in February 2020.

Mr. Jackson was aware of the posts. He understood that he received the benefit of services from Perfection Plastic Surgery & MedSpa in exchange for taking the photograph with Ms. Kogan and providing Ms. Kogan and her business with the right to publish what was captured.

It was not until a website called *The Shade Room* published an article, written by Matthew McNulty on August 17, 2022, that an issue arose. Mr. Jackson apparently takes great issue with the graphic that was created and used by *The Shade Room*. However, instead of filing claims against the author who wrote the article and/or the website that published it, Mr. Jackson has decided to smear Ms. Kogan's name and the name of her business without cause. The article's subject was Ms. Kogan. The article did not state that Mr. Jackson received a penis enhancement, nor did it include any commentary from Ms. Kogan stating same. Instead, Mr. McNulty accurately reported, in an article that also addressed penis enhancement procedures, that Ms. Kogan's extensive clientele of celebrities includes 50 Cent.

To be clear, our clients used the photograph with Mr. Jackson's consent. Additionally, our clients never provided the photograph to *The Shade Room*, and *The Shade Room* embedded the photograph on the article without our clients' knowledge or consent. Furthermore, our clients never falsely implied that Mr. Jackson was their client. He received services from, and thus was a client of, Perfection Plastic Surgery & MedSpa. Finally, Ms. Kogan never insinuated that she or her business provided a penile enhancement treatment to Mr. Jackson. Our clients did not take a single action to cause any damage to Mr. Jackson's professional or personal reputation and will vigorously defend against the frivolous claims that have been publicly filed against them and their thriving business.

/s/ Darren Heitner
Darren Heitner, Esq.

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