

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION

**TRAVELERS UNITED**  
2833 Alabama Ave SE #30736  
Washington, D.C. 20020,

Plaintiff,

v.

**CASSANDRA DE PECOL**  
23823 Malibu Road Suite 50 – 427  
Malibu, CA 90265  
Defendant.

Civil Action No. **2022 CA 001194 B**

AND

**EXPEDITION 196, LLC**  
23823 Malibu Road Suite 50 – 427  
Malibu, CA 90265  
Defendant.

**COMPLAINT FOR VIOLATIONS OF THE  
CONSUMER PROTECTION PROCEDURES ACT**

Travelers United brings this action pursuant to D.C. Code § 28-3905 for injunctive relief and statutory damages against both Cassandra De Pecol and her LLC, Expedition 196, for violations of the District’s Consumer Protection Procedures Act (“CPPA”), D.C. Code § 28-3901, et seq. In support of its claims, Travelers United states as follows:

**INTRODUCTION**

1. This is a misleading and deceptive advertising case. Since 2017, Cassandra De Pecol has claimed to be the first woman to travel to every country in the world, or some variation of that claim, to promote herself for financial enrichment even though Cassandra De Pecol was not the first woman to visit every country in the world, no one certified her as the first woman to visit every country in world and multiple women have proof that they traveled to every country in the world many years before De Pecol. In addition to the misleading and deceptive claims related to being the “first woman to travel to every country,” De Pecol very rarely discloses that she is being paid to advertise for certain brands on her social media platforms and she writes reviews for hotels on review platforms without disclosing she is likely being paid by the hotel. Additionally, De Pecol wrote five-star reviews for her own book sold on Amazon without disclosing it was her leaving the reviews. She also claims to have affiliations she does not actually have in order to attract more social media followers and thus sell to more consumers. Travelers United brings this action to force Cassandra De Pecol, and the LLC where she runs her business, to stop her misleading and deceptive claims relating to travel accomplishments in addition to compelling her to properly disclose when she is advertising on behalf of a brand and to make corrective disclosures on all social media posts with promoted product.
2. Cassandra De Pecol is an influencer who lives in the Los Angeles, California area. An influencer is a social media personality who posts photos and content in addition to pitching and advertising products amongst those photos and content. Instagram is a Meta owned social media platform where people can post photos in two ways. The first is where people can post individual photos that stay on the social media personality’s

account forever unless deleted. The second way to post photos on Instagram is through Instagram stories which, unless saved to their account, disappear within 24 hours. De Pecol has, as of March 13, 2021, 516,000 Instagram followers on her Instagram handle @cassiedepecol. *The Wall Street Journal's* data from Mediakix points out that with this many followers she likely earns between \$5,000 to \$25,000 per Instagram post.<sup>1</sup>

Instagram is De Pecol's most popular social media platform.

3. Cassandra De Pecol is also active on social media on platforms other than Instagram. She has a Facebook account, a YouTube account, a Twitter account, a Snapchat account and an active TikTok account. As of March 7, 2022, DePecol is followed by 61,000 people on Facebook, De Pecol has 28,000 subscribers on YouTube, defendant has 7,342 followers on Twitter and 208,400 followers on TikTok. TikTok is a social media platform used to share short-form videos. TikTok is owned by the Chinese company ByteDance.
4. Cassandra De Pecol conducts her social media influencing business through Expedition 196 LLC. The LLC is based in Malibu, California.
5. Instagram is a social media platform that is visible throughout the world, unless blocked by the local government. People with a high number of followers, such as De Pecol, have the option on turning off a specific country's viewership.<sup>2</sup> De Pecol has made her Instagram account accessible to the audience of the United States of America, including the District.

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<sup>1</sup> Susan Kapner and Sharon Terlep, Online Influencers Tell You What to Buy, Advertisers Wonder Who's Listening: Billions are paid to social-media personalities to pitch products in an influencer economy riddled with deceit, *THE WALL STREET JOURNAL*, (Oct. 20, 2019), <https://www.wsj.com/articles/online-influencers-tell-you-what-to-buy-advertisers-wonder-whos-listening-11571594003>

<sup>2</sup> Ivan Mehta, Instagram Is Testing Geo-Restriction For Stories and Posts, *THE NEXT WEB* (Sep. 20, 2018), <https://thenextweb.com/apps/2018/09/20/instagram-is-testing-geo-restriction-for-stories-and-posts/>

6. Instagram accounts can be public or private. Many regular people decide to make their Instagram accounts private to keep their photos between a limited number of people they have selected to share the photos with. Influencers, however, are in the business of getting their follower count as high as possible and this is only possible with a public account. Cassandra De Pecol selected to make her Instagram account public.
7. De Pecol promotes products on her social media pages for a living. She has worked to promote products such as Quest Nutrition bars, websites from Go Daddy and Venus razors (owned by Proctor & Gamble). Those brands in turn repeat De Pecol's false claims and promote her on their brand social media channels. The social media accounts for Go Daddy, Quest Nutrition and Venus are all viewable from the District.
8. Other companies, such as Marriott International, Inc. are likely giving Cassandra De Pecol free hotel rooms or are paying her to stay at their properties. De Pecol often posts on her social media accounts flattering photos of the properties, tags her location to the properties, and yet she never posts if these stays were gifted or if she was paid to post the photos. This lack of clarity is harmful to a consumer. These posts link back to a hotel's Instagram page which then is linked to the hotel and a booking can be made. The social media posts at Marriott International properties are viewable in the District. Defendant often leaves five star reviews for these properties on hotel review platforms without disclosing that she got a free stay or was paid to stay at these hotels.
9. De Pecol also wrote a book published by Lioncrest publishing that is available for purchase through Amazon and Barnes & Noble online. The book contains travel claims that are misleading and deceptive and have never been confirmed by any travel or record setting organization. The cover of the book contains a quote from Conde Nast Travel



though Conde Nast Travel later removed De Pecol from the article. De Pecol never updated her book cover. Amazon and Barnes & Noble websites are used to advertise and sell goods to residents of the District. Travelers United believes defendant has written five-star reviews for her own book on Amazon without disclosing it was her leaving the review.

10. De Pecol has a shop page on her website ([www.cassiedepecol.com/shop/](http://www.cassiedepecol.com/shop/)) which she uses to directly sell items to residents on the District. On this page available for purchase is a signed children's book that she is featured in, various mobile presets to improve photos, merchandise like hoodies and tank tops and her signed book. Mobile presets are predefined photo settings that brighten photos and slightly alter colors.<sup>3</sup> They are commonly sold by influencers.

11. De Pecol's Instagram and other social media accounts are used to advertise, market and sell goods to residents of the District of Columbia.

### **JURISDICTION**

12. This Court has jurisdiction over the subject matter of this case pursuant to D.C. Code § 11-921 and D.C. Code § 28-3905.

13. This Court has personal jurisdiction over the Defendant pursuant to D.C. Code § 13-423(a).

### **PARTIES**

14. Plaintiff is a nonprofit public interest organization for the purpose of promoting interests and rights of consumers empowered to sue and be sued. The mission of Travelers United

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<sup>3</sup> Jo Piazza, *If You Build It, They Will Come*, UNDER THE INFLUENCE PODCAST, (March 4, 2021) <https://open.spotify.com/episode/67Rtv0Hfcq0pm7KCFcKMnU>.

is to improve and enhance travel for consumers across all modes of travel. Travelers United has been instrumental in advocating against misleading and deceptive advertising federally and locally in the District. Travelers United has met with the DC Council and their staff regarding the issue. Nationally, Travelers United has worked and met with members of Congress, the National Association of Attorneys General, other national consumer advocacy groups and the Federal Trade Commission (FTC) educating, alerting and advocating against false, deceptive and misleading claims from social media influencers<sup>4</sup> in addition raising concerns about a lack of disclosures in social media influencing<sup>5</sup> Travelers United, based in Washington, D.C. and Virginia, has members who reside in Washington, D.C.

15. Defendant Cassandra De Pecol is a resident of Malibu, California who runs Expedition 196 LLC, also based in Malibu, California. Cassandra De Pecol sometimes goes by the name of Cassie De Pecol. Defendant owns and manages a portfolio of social media influencing streams that are used to advertise goods throughout the United States including to residents of the District. She sells various items on her website which she also advertises through her social media accounts. She conducts business through her LLC, Expedition 196, based in Malibu, California at 23823 Malibu Road Suite 50 – 427.
16. Cassandra De Pecol and Expedition 196 have, at all relevant times, engaged in trade or commerce in the District by advertising through her Instagram account, and other social media platforms, to District consumers. Her book has been for sale, at all relevant times, where it has engaged in trade or commerce in the District, through Amazon and Barnes &

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<sup>4</sup> Travelers United, *Paid Influencers Are Not Disclosing Their Partnerships*, TRAVELERS UNITED BLOG (Sep 28, 2021) <https://www.travelersunited.org/paid-influencers-are-not-disclosing-their-partnerships/>.

<sup>5</sup> Travelers United, *Who is the social media sheriff of Instagram?* TRAVELERS UNITED BLOG (March 2, 2022) <https://www.travelersunited.org/social-media-sheriff-of-instagram-facebook/>.

Noble's website, to District consumers. She also sells clothing, mobile presets and a signed version of a children's book of which she is featured on her website where it engages in trade or commerce with District residents through her website.

**CASSANDRA DE PECOL'S DECEPTIVE ADVERTISING PRACTICES**  
**Defendant's Practice of Misleading and Deceptive Travel Accomplishments**

17. This action was commenced after years of Cassandra De Pecol falsely claiming to be the first woman to travel to every country in the world, despite not having accomplished that feat, and after years of having people point this out to her and multiple news articles on the subject that were corrected. Despite this, she continues to make false and misleading statements regarding her travel accomplishments in order to gain more followers and profit from those followers. Then, when she does advertise to those followers, 68% of the time (see appendix) she does not disclose that she is advertising on behalf of a brand.
18. Cassandra De Pecol is the first Instagram influencer to claim that she is the first woman to travel to every country. Her logic seems to come from the idea, "If a tree falls in a forest but it wasn't captured on Instagram with someone with hundreds of thousands of followers, did it happen?" Travelers United asserts that there is a world beyond Instagram with incredible travel accomplishments. Just because something did not happen on Instagram, it does not mean that it did not happen.
19. Influencers are defined by the American Bar Association as "any person with credibility who can influence the opinions or purchase decisions of others."<sup>6</sup> When asked to describe

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<sup>6</sup> Mark Goodrich and Jason Howell, *Influencers: What Every Brand and Legal Counsel Should Know*, THE AMERICAN BAR ASSOCIATION, (last visited May 1, 2021) [https://www.americanbar.org/groups/intellectual\\_property\\_law/publications/landslide/2018-19/september-october/influencers/](https://www.americanbar.org/groups/intellectual_property_law/publications/landslide/2018-19/september-october/influencers/).

an influencer in the HBO Documentary *Fake Famous*, Taylor Lorenz, a reporter of internet culture, described them as “somebody who is half entrepreneur and half celebrity.” Hana Hussein, a social media manager, described an influencer in the documentary as “anyone who has access to a large following whether it is real or fake and they are able to promote themselves or brands.”<sup>7</sup>

20. The higher someone’s follower count is on social media, the more that social media star can charge to “influence” their followers. Influencing is big business. The *Harvard Business Review* reported that “in 2018, 19% of all U.S. consumers – including 36% of those aged under 25 – purchased a product or a service because a social media influencer recommended it.”<sup>8</sup> On the *Under the Influence* podcast by Jo Piazza, she reports that “brands are going to bring in more than 10 billion dollars from Instagram this year, 15 billion by 2022. It’s a multi-billion dollar industry.”<sup>9</sup>

21. The goal of influencing on Instagram, and other social media platforms, is to get as many followers and as much engagement (people liking and commenting on posts, people watching their Instagram stories) as possible. That shows to a brand that a certain influencer has a loyal and engaged following who will listen to what products said influencer recommends. Companies pay influencers big money to advertise on behalf of their brands. Kim Kardashian has reported earning up to one million dollars per

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<sup>7</sup> FAKE FAMOUS (Nick Bilton, 2021)

<sup>8</sup> Alice Audrezet and Karine Charry, *Do Influencers Need To Tell Audiences They’re Getting Paid*, HARVARD BUSINESS REVIEW, August 29, 2019, <https://hbr.org/2019/08/do-influencers-need-to-tell-audiences-theyre-getting-paid>

<sup>9</sup> Jo Piazza, *A More Perfect Mother*, UNDER THE INFLUENCE PODCAST, (February 4, 2021) <https://open.spotify.com/episode/67Rtv0Hfcq0pm7KCFcKMnU>.

Instagram post<sup>10</sup> while her sister Kylie Jenner is reportedly earning 1.2 million dollars per Instagram post. Cristiano Ronaldo, the soccer star who happens to be the most followed person on Instagram, commands \$975,000 per Instagram post.<sup>11</sup> Very large sums of money are paid by brands to influencers to have them promote products on Instagram and other forms of social media. “Lives that can be monetized”<sup>12</sup> summarizes Jo Piazza on her podcast *Under the Influence*. But what happens when the main claim behind that monetized Instagram life is a lie? Travelers United asserts that lying about one’s travel accomplishments for the purpose of growing one’s social media following so that one has a more successful influencer business to sell products to followers is a violation of the District’s CPPA.

22. De Pecol has her posted rates available online in her media kit from 2018.<sup>13</sup> A more recent media kit is not publicly online but after years of deceptive and misleading claims related to travel, her follower count has only grown and she is likely to be able to charge rates much higher than the ones she posted in 2018. Below are her rates page from her 2018 media kit:

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<sup>10</sup> Alicia Brunker, *Kim Kardashian Says She Makes More Money on Instagram Than for an Entire Season of KUWTK*, IN STYLE, October 18, 2020, <https://www.instyle.com/celebrity/kim-kardashian-makes-more-money-on-instagram-than-kuwtk>

<sup>11</sup> BBC, *How much does Kylie Jenner earn on Instagram?* WWW.BBC.CO.UK, (July 26, 2019) <https://www.bbc.co.uk/newsround/49124484>.

<sup>12</sup> Jo Piazza, *A More Perfect Mother*, UNDER THE INFLUENCE PODCAST, (February 4, 2021) <https://open.spotify.com/episode/67Rtv0Hfcq0pm7KCFcKMnU>.

<sup>13</sup> Cassie De Pecol Media Kit, [https://marmont-web-production.s3.amazonaws.com/uploads/media\\_kits/5612f8031bfa211de505e3e2/33b00109-dcbf-44d4-9278-a19cd431f934-2018+Media+Kit.pdf](https://marmont-web-production.s3.amazonaws.com/uploads/media_kits/5612f8031bfa211de505e3e2/33b00109-dcbf-44d4-9278-a19cd431f934-2018+Media+Kit.pdf) (last visited March 7, 2022).

# CASSIE DE PECOL

Author | Influencer | Record Holder | Keynote Speaker | Filmmaker

Los Angeles | New York | 28 Years Old

Cassie De Pecol is a Los Angeles based Author, Speaker and Content Creator best known for being the first woman on record to travel to every country in the world, awarding her two Guinness World Record titles with honorable recognition in the National Women's History Museum.

Through her carefully curated social media platforms, Cassie has grown her online presence to over 550,000 in a matter of two years due to her consistent media attention from her achievements. Her audience knows her best for sharing her experiences through travel, photography, fitness, fashion, and products that she firmly believes in. Her Instagram account alone receives over 1 million impressions weekly.

Setting Cassie apart from the rest is her passion and ability to secure media attention for the brands she works with. With her upcoming trip to space with Virgin Galactic, book launch in the summer of 2018, 501(c)3 Her International Inc., as well as documentary, merchandise, and app launch, Cassie maintains close ties with the media and loves to see her partners audiences grow substantially through her works.

[www.cassiedepocol.com](http://www.cassiedepocol.com)

## SOCIAL MEDIA RATES

\$4,500

Instagram Post

\$2,500

Instagram Story (24-48 hours)

\$3,000 / day

Influencer Event

\$6,500

YouTube Video

\$7,000

Cross-Platform All Social (20k+)

\$3,000 / hour

Event Appearance

## SPEAKING RATES

(in addition to business class transport & accommodation)

\$12,000

Keynote (maximum 15 College Age Students)

\$18,000

Corporate Events

## BLOG RATES

\$1

/ word

Excluding to Expansion 10k

\$75

/ word

General Review (travel, Transportation, Experience)

\$1,250

/ hour

Your Blog Article posted to: [cassiedepocol.com](http://cassiedepocol.com)

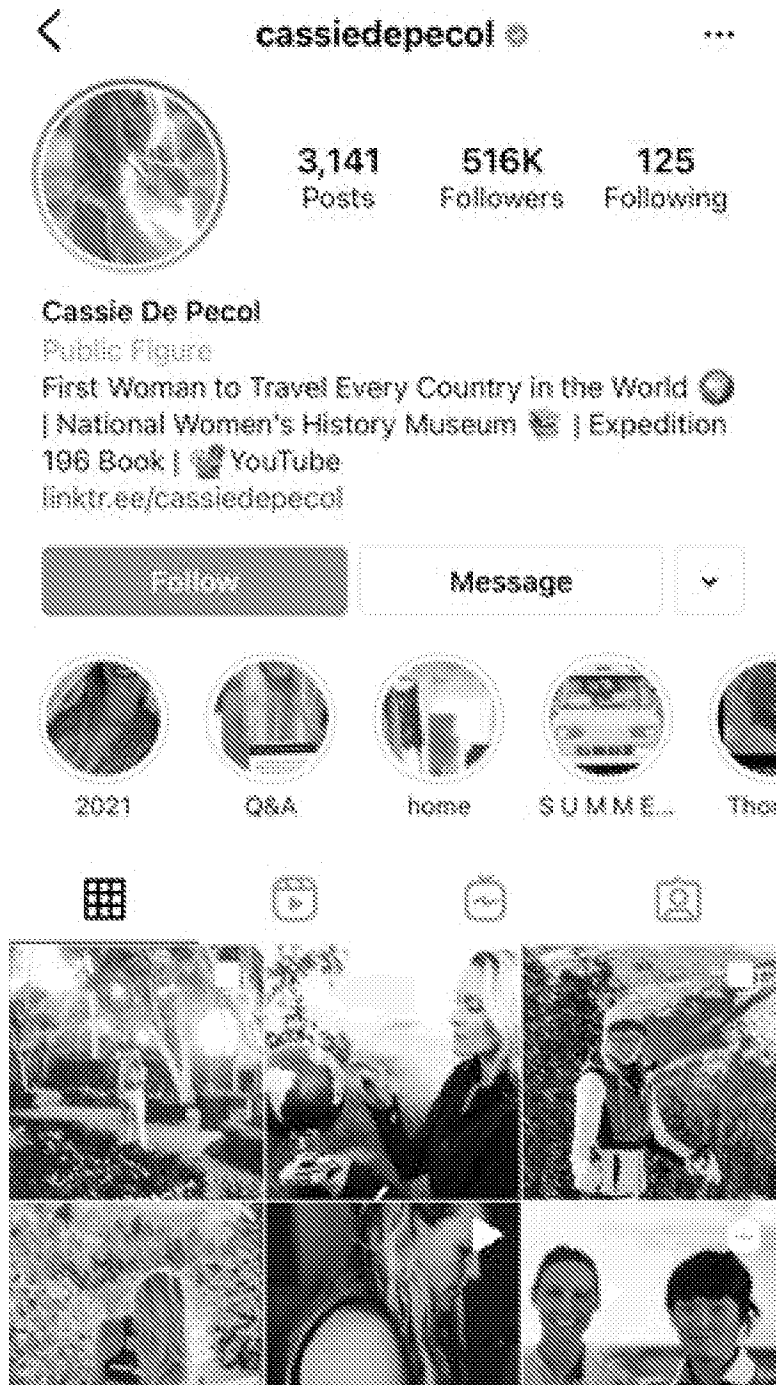
\*Package rates available upon request

Here defendant states that she charges a brand \$4,500 to post one Instagram post. She charges \$2,500 to post one Instagram story. She charges \$6,500 to make a YouTube video. She charges \$7,000 to post across all of her social media and she charges \$3,000 to show up for event appearances. Defendant states that her speaking rates, which do not include her required business class transportation and accommodation, are \$18,000 for corporate events and \$12,000 for non-profit institutions. Jo Piazza reports that there is a by post baseline for how much influencers get paid per post and that is “\$100 per 10,000 followers.”<sup>14</sup> De Pecol’s rates line up with that baseline.

23. The first line in defendant’s Instagram bio is “First Woman to Travel to Every Country in the World.” Defendant is not the first woman to travel to every country in the world. This is a misleading and deceptive claim in violation of the District’s CPPA. Defendant uses this deceptive claim to acquire more followers who she can then advertise and sell goods to. Below is a screenshot of defendant’s Instagram page as of March 18, 2021:

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<sup>14</sup> Jo Piazza, *A More Perfect Mother*, UNDER THE INFLUENCE PODCAST, (February 4, 2021) <https://open.spotify.com/episode/67Rtv0Hfcq0pm7KCFcKMnU>.



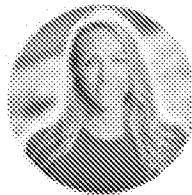
24. The first line in Defendant's TikTok page is "First Woman to Travel to Every Country."

Defendant is not the first woman to travel to every country. Below is defendant's TikTok page as of March 6, 2022:





cassiedepecol



@cassiedepecol

343

Following

208.4K

Followers

2.5M

Likes

Follow



First Woman to Travel Every Country 🌍  
Vids from EVERY COUNTRY on my YouTube 📺

<https://youtube.com/c/CassieDePecol>

Q&A



25. There are many women who traveled to every country on Earth before Cassandra De Pecol. Because there is no certifying organization of “firsts” in travel, no one can be for sure who the first woman to visit every country is. The Travelers Century Club (TCC) is an American-based social organization for extremely well-traveled people that has been around since 1954. The Travelers’ Century Club has an official list of countries and territories that it uses to promote travel across the world. Currently there are 329 countries and territories on the list<sup>15</sup> but depending on international politics certain countries and territories are removed, renamed or combined and the list is updated fairly regularly.
26. The Travelers Century Club (TCC) requires that people have traveled to at least 100 of the TCC-recognized countries and territories before joining the club. Spouses and partners who have traveled to fewer countries and territories may join as well. The TCC is a social club, not a certifying organization of travel, but Travelers United had conversations with multiple members and they explained that someone who is not able to show they traveled to 100 countries could potentially be thrown out of the club. Since this is the only social club devoted to extreme travel, many of the women in the club obviously knew each other and talked amongst each other about travel tips since 1954. Among TCC members, Dorothy Pine is wildly regarded as probably the first woman to have traveled to every country.<sup>16</sup> Her accomplishments were noted by the Colorado State

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<sup>15</sup> Traveler’s Century Club, *Countries & Territories*, <https://travelerscenturyclub.org/countries-and-territories> (last visited March 7, 2022).

<sup>16</sup> Bob Pine, *Wanderlust Brings Distinction: Pair May Be Most Traveled On Planet*, LAWRENCE JOURNAL-WORLD, March 26, 2006, [https://www2.ljworld.com/news/2006/mar/26/wanderlust\\_brings\\_distinction\\_pair\\_may\\_be\\_most\\_tra/](https://www2.ljworld.com/news/2006/mar/26/wanderlust_brings_distinction_pair_may_be_most_tra/).

Legislature in 2006.<sup>17</sup> She passed away in 2011. A *Boulder Daily Camera* obituary of Pine from August 17, 2011 notes “Dorothy and Robert became the first couple in the world to have visited each of the world’s 192 recognized countries...Dorothy is also recognized as the first woman to have achieved this milestone.”<sup>18</sup> Dorothy Pine did not have an Instagram account. Travelers Century Club members stressed that there obviously could have been other women who were not TCC members in America, and women in other countries, who did this before Dorothy Pine but who never sought any press or attention for their accomplishments.

27. Dorothy Pine traveled with her husband. The Colorado State Legislature recognized her for their accomplishments together. The first woman in America to travel to every country somewhat independently of her husband seems to be widely regarded by TCC members as Audrey Walsworth. According to TCC members, Walsworth and Pine finished their travels to every country at around the same time.

28. Audrey Walsworth is currently 87 years old and is from Marceline, Missouri. She does not have an Instagram account. Her family owns Walsworth Publishing Co.<sup>19</sup> which, according to Bloomberg “offers printing, mailing, and distribution services for catalogs, yearbooks, books, newsletters, brochures and other print media.” Coming from a family that has been extremely successful<sup>20</sup> in making books, yearbooks, newsletters, brochures

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<sup>17</sup> Janice Lintz, Is The Media Spreading Fake News? THE HUFFINGTON POST, May 24, 2017, [https://www.huffpost.com/entry/is-the-media-spreading-fake-news\\_b\\_59209876e4b0e8f558bb2716](https://www.huffpost.com/entry/is-the-media-spreading-fake-news_b_59209876e4b0e8f558bb2716).

<sup>18</sup> The Daily Camera, Dorothy May Pine, WWW.DAILYCAMERA.COM, <https://www.dailycamera.com/2011/08/17/dorothy-may-pine/> (last visited April 28, 2021).

<sup>19</sup> Dun & Bradstreet, D&B Business Directory: Walsworth Publishing Company, Inc., WWW.DNB.COM, [https://www.dnb.com/business-directory/company-profiles.walsworth\\_publishing\\_company\\_inc.a9658937db83765eb0efdf74d9e85ed7.html](https://www.dnb.com/business-directory/company-profiles.walsworth_publishing_company_inc.a9658937db83765eb0efdf74d9e85ed7.html) (last visited April 28, 2021).

<sup>20</sup> Bloomberg Walsworth Publishing Co Inc, WWW.BLOOMBERG.COM, <https://www.bloomberg.com/profile/company/6566336Z:US> (last visited April 28, 2021).

and catalogs for a living, she is an avid collector of documents, souvenirs, photos and proof of her travels. Audrey Walsworth states that she has not just been to all 193 United Nations recognized countries, she has completed the entire TCC list of countries and territories as of 2018.<sup>21</sup> She has received press for her accomplishments including a 2013 profile in the *Columbia Daily Tribune* with the headline “On Top of the World: An Interest in People and Cultures Led Audrey Walsworth to Become The Only Woman to Visit Every Country.”<sup>22</sup> Many members of the TCC traveled with Walsworth to some of the most remote places on earth and they stated that they believe she has extensive proof and documentation of all of her travels. Walsworth confirmed this with Travelers United and invited anyone who wanted to see her documented proof of travel accomplishments to her home.

29. Travelers Century Club (TCC) members believe there are likely somewhere between 10 to 30 women who visited every UN recognized country by 2017. TCC members were stressed there could be far more in countries outside of the United States and who did not seek press for their accomplishments.
30. One particular woman from another country with this accomplishment is Nina Sedano of Germany. Nina Sedano is currently 56 years old and she finished her travels to all 193 UN recognized countries by 2011. Nina Sedano does not have an Instagram account. Nina Sedano stresses that she is the only woman in the German speaking world to have visited all 193 countries. She wrote a book about her travels to every country that

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<sup>21</sup> Meg Jerrard, *Meet Audrey, The World's Most Well Traveled Woman*, SOLO FEMALE TRAVELERS CLUB (last visited March 2, 2022) <http://www.solofemaletravelers.club/most-traveled-woman/>

<sup>22</sup> Karyn Spory, *Audrey Walsworth, led by curiosity, only woman to visit every country*, COLUMBIA DAILY TRIBUNE, (June 13, 2013), <https://www.columbiatribune.com/article/20130616/News/306169870>.

remained on the German best seller list for 60 weeks.<sup>23</sup> Sedano has been interviewed twice about her travels by the *Frankfurter Allgemeine Zeitung*. The *Frankfurter Allgemeine Zeitung* is a highly regarded paper in Germany. In 2016 the Sunday edition won the title of “European Newspaper of the Year” from the European Newspaper Awards.<sup>24</sup> Sedano has appeared extensively in the German press. Nina Sedano is German and holding up to the stereotypes of her country, she has kept meticulous records of all of her travels including holding on to all 10 passports she has used. These have been shown to press and even photographed in newspaper articles.<sup>25</sup> Sedano already has shown her proof of travels to German press and she has also volunteered to show it to anyone who is interested in seeing it. Nina Sedano has verified her documented travels to all 193 UN recognized countries with NomadMania,<sup>26</sup> the only general travel verification website currently in existence.

31. NomadMania confirmed with Travelers United that Nina Sedano has traveled to all 193 United Nations countries. NomadMania is a nonprofit that started in 2012. They are the “only place where highly ranked travelers are verified, to ensure their travel claims are valid while at the same time being the authority on the people who have been to every country.”<sup>27</sup> They require actual proof of travel to be verified as having traveled to all countries. NomadMania has a posted user guide which states:

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<sup>23</sup> NomadMania, *Nina Sedano*, WWW.NOMADMANIA.COM, <https://nomadmania.com/interviews/29> (last visited March 7, 2022).

<sup>24</sup> Susanne Hermann, *European Newspaper Award Das sind die besten Zeitungen Europas*, W&V (last visited April 28, 2021), [https://www.wuv.de/specials/premium\\_erlebnis\\_print/das\\_sind\\_die\\_besten\\_zeitungen\\_europas](https://www.wuv.de/specials/premium_erlebnis_print/das_sind_die_besten_zeitungen_europas).

<sup>25</sup> Kitty Pohl, *Nina Sedano: Zuhause bei der meistgereisten Frau Deutschlands*, TOP MAGAZIN FRANKFURT, (April 28, 2021), <https://www.top-magazin-frankfurt.de/redaktion/panorama/nina-sedano-zuhause-laendersammlerin-frankfurt-nordend/>.

<sup>26</sup> NomadMania, *Nina Sedano*, WWW.NOMADMANIA.COM, <https://nomadmania.com/profile/6800> (last visited March 7, 2022).

<sup>27</sup> NomadMania, *Scholarships*, WWW.NOMADMANIA.COM, <https://nomadmania.com/scholarships.html> (last visited March 7, 2022).

“In order for a visit to qualify as valid for nomadmania.com, a ‘minimal’ visit is required. Nomadmania.com defines a minimal visit as:

...In the case of airports, this needs to be beyond the airport area entirely, while for train transport, a minimal visit involves a reasonable distance beyond the train station itself.”<sup>28</sup>

NomadMania makes it very clear with their visit guidelines that someone who lands at an airport, walks around the airport for forty-five minutes, and then re-boards a plane to leave without ever exiting the airport area did not visit the country. Defendant has never had her travels verified with NomadMania.

32. In addition to NomadMania, another travel tracking group is called Most Traveled People. Most Traveled People (MTP) is similar to an online Travelers Century Club where people can communicate and talk online about extreme travel accomplishments. They, like Travelers Century Club and NomadMania, have their own list of unique travel destinations far beyond the 193 UN recognized countries. They, like NomadMania, allow people to confirm their travels with the community. Travelers who register are free to list their accomplishments themselves and are only removed from the site if people in the community raise concerns about the accomplishments being listed. In their frequently asked questions the MTP website states:

“What happens if someone is lying and checks more boxes than they’ve actually traveled?

Normally, another member will notice and report the offending member, who may claim to have been to many extraordinarily difficult places, but has never met or heard of before by other top members of the community. MTP Admin will contact the offending member and ask for more details, including proof, of the difficult claims, and will usually suspend the account in the

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<sup>28</sup> NomadMania, *Visit Guidelines*, WWW.NOMADMANIA.COM, <https://nomadmania.com/instructions/guidelines> (last visited April 28, 2021).

meantime. If no satisfactory proof is forthcoming, the account is deleted.”<sup>29</sup>

Defendant never registered or documented her travels with Most Traveled People.

33. Defendant had her travels registered with Guinness World Records (GWR). GWR has offices in London, New York, China, Japan and the United Arab Emirates.<sup>30</sup> De Pecol set out to break the GWR record for “Fastest time to travel to all sovereign nations.” This is a speed record. The person attempting the feat must visit every country in a very short amount of time. It is an impressive logistical feat. Guinness World Records, however, has a very different set of rules for what constitutes a visit to a country than travel certification websites like NomadMania.
34. De Pecol noted that she was originally going for one Guinness World Record. Somehow this one record became two. “Fastest time to travel to all sovereign nations” and a new category for “Fastest time to travel to all sovereign nations – female.” Why did Guinness add a new category to this? Likely because Guinness is in the business of certifying records. The more records there are to certify, the more money they get. De Pecol outlined this certification process on her YouTube channel where she details that one needs to pay \$800 to certify each record and another \$600 if one wants a record expedited.<sup>31</sup> So if there are two records instead of one, GWR gets twice as much money. *Vox* wrote an article titled “Guinness World Records is no longer just a company. It’s a branded experience.” The article goes on to say “What do you do when all the good

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<sup>29</sup> Most Traveled People, *FAQ*, [HTTPS://MTP.TRAVEL](https://mtp.travel/faq), <https://mtp.travel/faq> (last visited March 7, 2022).

<sup>30</sup> Guinness World Records, *Our Company*, [WWW.GUINNESSWORLDRECORDS.COM](http://WWW.GUINNESSWORLDRECORDS.COM), <https://www.guinnessworldrecords.com/about-us/our-company> (last visited April 28, 2021).

<sup>31</sup> Cassie De Pecol, *200+ Countries in 18 Months | How I Proved Being the Fastest Person to Travel Every Country*, YouTube (Dec. 12, 2020), <https://www.youtube.com/watch?v=rgltTyH5Wr0&t=623s>.

world records have been set? Hire Guinness to help you invent some new ones.”<sup>32</sup> John Oliver on *Last Week Tonight* had almost half of an episode criticizing Guinness World Records on this.<sup>33</sup> The point is clear. This is a company whose survival depends on certifying records. Even so, Guinness World Records was very clear that it never certified Cassie De Pecol as the first woman to visit every country. De Pecol went for the speed record. Her record was quickly broken by another American woman, Taylor Demonbreun.<sup>34</sup>

35. Guinness World Records has their own unique set of rules for their record for the fastest time to visit all sovereign countries. They state that a participant cannot spend more than 14 days in one country. They state that the person cannot rent their own car or travel by private jet or private boat. They also have uniquely lax interpretations of what constitutes a visit to currently difficult to get to countries. Why do they have these lax rules for what constitutes a country visit? Probably because, again, they are in the business of certifying as many records as possible and the more people that attempt to certify these records, the better it is for business. For example, given the current ban on using an American passport to enter North Korea, GWR currently counts a visit from South Korea, entering the blue houses in the Demilitarized Zone (DMZ) as a visit to North Korea.<sup>35</sup> Without ever having been processed through North Korean immigration, one can count this as a visit to North Korea per Guinness World Records rules. Another interesting example is

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<sup>32</sup> Phil Edwards, *Guinness World Records is no longer just a book company. It's a branded experience.*, Vox, (Mar. 6, 2015), at 1.

<sup>33</sup> Last Week Tonight, *Gurbanguly Berdimuhamedov: Last Week Tonight with John Oliver (HBO)*, YouTube (Aug. 12, 2019), <https://www.youtube.com/watch?v=-9QYu8LtH2E>.

<sup>34</sup> Fastest Time To Visit All Sovereign Countries (Overall) Taylor Demonbreun, (Last visited March 6, 2022), <https://www.guinnessworldrecords.com/world-records/461033-fastest-time-to-visit-all-sovereign-countries-overall>.

<sup>35</sup> Lexie Alford (@lexielimitless), Instagram, (June 1, 2019) [https://www.instagram.com/p/ByL--\\_9HPf4/](https://www.instagram.com/p/ByL--_9HPf4/)



that they currently count a visit to the Golan Heights in Israel as a visit to Syria.<sup>36</sup> The United States recognizes the Golan Heights as Israel so Guinness World Records is clearly using their own geographic determinations to determine country visits that greatly differ from those of the United States government.<sup>37</sup>

36. In addition to loosening the rules of what counts as a visit for more difficult to reach countries, Guinness World Records rules state that a country visit can be as simple as exiting a plane, walking around the airport, never leaving the airport property and boarding the plane again.<sup>38</sup> In 2017, defendant admitted to doing this five times.<sup>39</sup> By 2021, she admitted to doing this fifteen times.<sup>40</sup> Given defendant's questionable assertions around other claims, it is highly possible she did this far more than 15 times. Another American in the well-traveled community and a Norwegian traveler with a blog coincidentally rode on a plane with her from Tuvalu, an island nation in the South Pacific.

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<sup>36</sup> Arikoglu, Lale and Meredith Carey. *How I Visited Every Country in the World: Jessica Nabongo on Setting Records*. CONDE NAST TRAVELER, (Jan 29, 2020), <https://www.cntraveler.com/story/how-i-visited-every-country-in-the-world-jessica-nabongo-on-setting-records>.

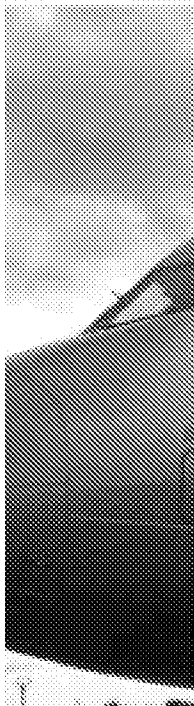
<sup>37</sup> Vanessa Romo, *Trump Formally Recognizes Israeli Sovereignty Over Golan Heights*, NPR, (March 25, 2019) <https://www.npr.org/2019/03/25/706588932/trump-formally-recognizes-israeli-sovereignty-over-golan-heights>.

<sup>38</sup> Trek with Taylor, *The Stressful Country*, WWW.TREKWITHTAYLOR.COM, <https://www.trekwithtaylor.com/travel-blog/afghanistan> (last visited March 7, 2022).

<sup>39</sup> Megan Lee and Erin Oppenheim, *Cassie De Pecol: The Fastest (AND 1st!) Woman to Visit Every Country in the World*, WWW.GOABROAD.COM, <https://www.goabroad.com/articles/interview-cassie-depecol-expedition-196> (last visited March 7, 2022).

<sup>40</sup> How To Travel the ENTIRE world for \$10,000 | Cassie De Pecol, *The Iced Coffee Hour*, <https://www.youtube.com/watch?v=oT87g2qQVOA> (last visited March 7, 2022).

gates@fiji-airways.com.fj - 2015/05/05 10:00:00



The day we were leaving the island waiting for the plane, a girl stumbled into the departure lounge. I asked her who she was as I hadn't seen her on the island the days before, she mentioned she just arrived with the same flight we were leaving with. She was also going back with the same flight. This was Cassandra de Pecol, a girl from Connecticut, US that were on a expedition around the world to become the fastest person to travel to all the countries in the world. When entering Tuvalu she had noticed it's particularly when I was there just, she is about to become the fastest person to travel to all the countries in the world. She was on the flight back to Fiji, 3 extreme travelers sharing stories and tips. The center got smaller by the minute.



Cassandra de Pecol, Jontac, Porgrove and me at Funafuti Int Airport.

De Pecol here in Tuvalu, likely knowing her “first woman to visit every country” claim would be known to be untrue by another American extreme travelers, stuck to the truth when introducing herself which was that she wanted to become the fastest person to travel to all the countries in the world. Here she spent about 45 minutes in Tuvalu.

37. Travelers United reached out to Fiji Airways, the only commercial airline that flies into Tuvalu. Fiji Airways explained that their flights into Funafuti Airport, the capital of Tuvalu, arrive at 10:35am and depart generally at noon. When asked if one could simply exit the plane, get a passport stamped and get back on the flight they said it was possible but it would mean being on the ground in Tuvalu for under an hour. A Norwegian man, Hans Petter Stølsvik, who was leaving Tuvalu that day, wrote on his blog:

The day we were leaving the island waiting for the plane, a girl stumbled into the departure lounge. I asked her who she was as I hadn't seen her on the island the days before, she mentioned she just arrived with the same flight we were leaving with. She was also going back with the same flight. This was Cassandra de Pecol, a girl from Connecticut, US that were on a expedition around the

world to become the fastest person to travel to all the countrys in the world.<sup>41</sup>

Cassandra De Pecol landed in Tuvalu, entered the airport, then walked outside back onto the tarmac to return on the same flight that she just got off of. She saw nothing else of the country. This qualifies as a country visit per Guinness World Records rules but it does not qualify as a visit per NomadMania, the travel verification website.

38. Recognizing that these sort of extremely quick airport turnarounds did not portray the image of someone who is well traveled, defendant seems to have exaggerated some of these tales. Her Guinness World Records profile writes “In spending anywhere from one single day to two weeks in a country, Cassie faced...”<sup>42</sup> but in many countries it is clear she didn’t spend a day. She didn’t even spend an hour.
39. Travelers United encourages all forms of travel. Whether someone wants to fly hundreds of miles to a remote South Pacific island nation only to turn around and leave within the hour or whether someone wants to road trip to Vegas to eat at every single buffet on the Las Vegas Strip. Everyone should be able to determine how they personally want to travel and should do what works best for them. They should not, however, make misleading and deceptive claims about those travels for financial profit in violation of the law.
40. Defendant was awarded TWO Guinness World Records of “Fastest time to visit all sovereign countries” and “Fastest time to visit all sovereign countries – Female” in

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<sup>41</sup> Hans Peter Stølsvik, *Tuvalu - paradise on earth, may 2016! GO BY STØLSVIK*, <https://www.gobystolsvik.com/destination/tuvalu-paradise-on-earth-may-2016/> (Last visited March 7, 2022).

<sup>42</sup> Kristen Stephenson, *Monday Motivation: Around the world in 559 days*, GUINNESS WORLD RECORDS, (March 31, 2017), <https://www.guinnessworldrecords.com/news/2017/3/monday-motivation-around-the-world-in-558-days-467537>.

March 2017. This is a speed record awarded to the person who has the fastest time to visit every country per the unique country visit standards of Guinness World Records. The record states that she visited all sovereign nations in one year and 193 days or 558 days. De Pecol also says that she visited an additional three countries, the reason for naming her LLC Expedition 196. Five hundred and fifty-eight (the number of days of her trip as certified by GWR) divided by 196 countries (the number of countries De Pecol claims to have visited) is 2.84 days. This means that defendant actually spent 2.84 days in each country, likely much less in many cases, to make this record. This is not even factoring in travel time which to reach some South Pacific island nations or other hard to get to countries can be a day of travel itself, if not more. It is unquestionably an impressive logistical achievement but De Pecol did not settle for truthful claims of participating in this as a race; rather she wanted to be portrayed as someone who spent time in these countries, likely because that would be better for her business of travel influencing. Basic math makes it clear she did not spend much time at all in these countries. In talking with Go Abroad Travel, she said in 2017 “I averaged around 6 days per country.”<sup>43</sup> She did not average six days per country, as she spent less than 2.84 days per country according to her own record. If she had actually visited each of 196 countries for six days each it would have taken 1,176 days or 3.22 years. That’s a big difference in how long she is telling people she spent in each country and the time the actual record shows of how long she spent in each country.

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<sup>43</sup> Kristen Stephenson, *Monday Motivation: Around the world in 559 days*, GUINNESS WORLD RECORDS, (March 31, 2017), <https://www.guinnessworldrecords.com/news/2017/3/monday-motivation-around-the-world-in-558-days-467537>.

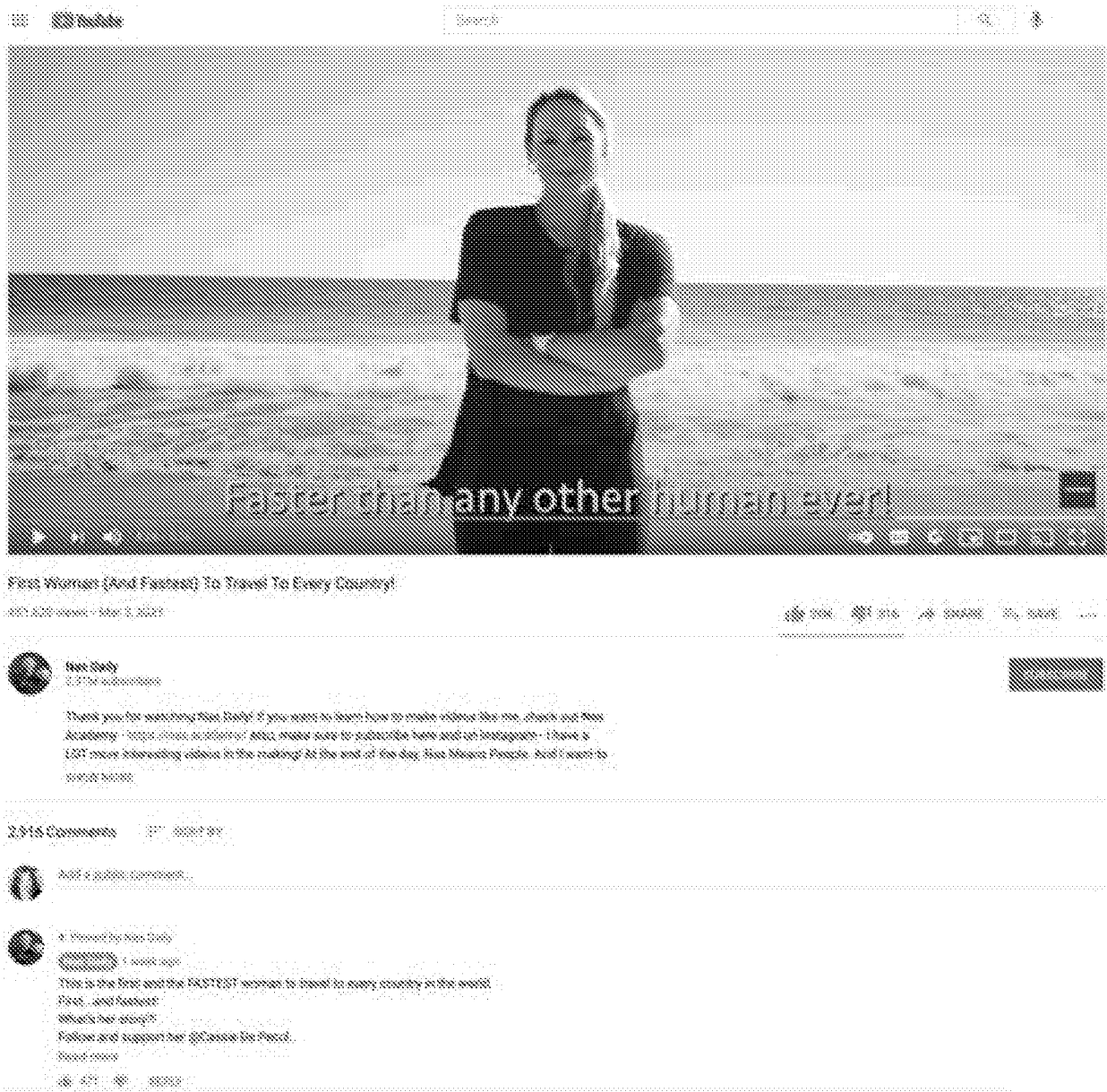
41. Defendant held the Guinness World Records for “Fastest time to visit all sovereign nations” and “Fastest time to visit all sovereign countries – Female” until they were broken the following year on December 7, 2018 by Taylor Demonbreun.<sup>44</sup> Taylor Demonbreun holds the titles to the day of this filing
42. Defendant does not solely make false and misleading statements about her claim to be the first woman to travel to every country, she makes deceptive and misleading statements regarding these Guinness World Records as well. Her Twitter biography<sup>45</sup> notes that she is a “2x Guinness World Records Holder” as does her website. Defendants records were broken in 2018 by Demonbreun. She recently produced a video with Nas Daily.<sup>46</sup> Nas Daily is a popular YouTube channel that has 7.05 million subscribers. The video featuring defendant was released on March 3, 2021 and was titled “First Woman (And Fastest) to Travel to Every Country!” and as of March 5, 2022 has 690,247 views. De Pecol is neither the first woman, nor the fastest, to travel to every country. Demonbreun currently holds the title for the “fastest time to visit all sovereign countries – female” and “fastest time to visit all sovereign countries (overall)” but she is not once mentioned in the video De Pecol made with Nas Daily. Below is a screenshot of the YouTube video.

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<sup>44</sup> Kristen Stephenson, *From Iran to Iceland: One woman’s adventure to visit every country in the world in 18 months*, GUINNESS WORLD RECORDS, (June 10, 2019), <https://www.guinnessworldrecords.com/news/2019/6/from-north-korea-to-canada-one-womans-adventure-to-visit-every-country-in-the-w-576793>.

<sup>45</sup> Cassie De Pecol, *Twitter*, WWW.TWITTER.COM, <https://twitter.com/cassiedepecol> (last visited April 29, 2021).

<sup>46</sup> Nas Daily (Nuseir Yassin), *YouTube*, WWW.YOUTUBE.COM, <https://www.youtube.com/watch?v=vF4QHQCUIs> (last visited March 7, 2021).



Does the truth matter though? Travelers United asserts that it does and that promoting false information in an effort to acquire more Instagram and TikTok followers, who defendant can then advertise and sell product to, is misleading and deceptive and in violation of the District’s Consumer Protection Procedures Act. This video launched Cassie De Pecol’s Instagram account from about 505,000 followers on February 13, 2021

to 516,000 followers by March 15, 2021. According to Jo Piazza's Instagram baseline per post reporting, the Nas Daily video helped De Pecol get more than an additional 10,000 followers which is the equivalent of earning yet another \$100 per Instagram post.

43. Travelers United asserts that defendant has a history of feeding misleading and deceptive false information to reporters in an attempt to get positive press and grow her social media following so that she can increase her work as a social media influencer. She has purposefully released press releases with false information in order to gain positive press. The more followers she has, the more people she can advertise and sell goods to. In one of defendant's press releases from February 9, 2016, she headlines the release: "Great Story Happening in NYC This Week: First Woman to Travel to All Countries to Speak at NYU."<sup>47</sup> The press release says it comes from defendant's LLC, Expedition 196. The

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<sup>47</sup> PR News, *Great Story Happening in NYC This Week: First Woman to Travel to All Countries to Speak at NYU*, WWW.PR.COM, <https://www.pr.com/press-release/657494> (last visited April 29, 2021).

press release is pictured below:



A screenshot of defendant's misleading and deceptive press release sent to reporters on February 9, 2016.

44. Defendant has asserted to the press that she is the first woman to travel to every country in the world, the first American woman to travel to every sovereign nation, the youngest American to travel to every sovereign nation, the first documented woman to travel to every sovereign nation and the first woman to travel alone to every nation. None of these



claims were ever certified by Guinness World Records nor were they ever certified by any travel organization. Defendant likely told Nas Daily that she was the fastest woman to travel to every country in the world when she has not had that distinction since 2018. The Guinness World Records website clearly states the record belongs to Taylor Demonbreun. Nas Daily, like many reporters before him, likely trusted the information defendant provided and did no research to verify defendant's claims. Nas Daily should have known better. Nas Daily is not just one guy with a camera. Nuseir Yassin, who founded Nas Daily, is a Harvard educated man, and his content company that made this video employs over fifty people.<sup>48</sup>

45. If a man with a Harvard education and a staff of fifty was duped, imagine the consequences of what happens when a freelance reporter gets a press release about one of defendant's self-claimed achievements and just wants to write a nice soft piece on women's travel accomplishments. De Pecol worked fastidiously to obtain as much press as possible. Contacting press was likely a serious part of that effort given the amount of press she received.
46. De Pecol has received press in NBC News / Today Show, ABC News / Good Morning America, TravelPulse, Virgin Atlantic blog, Women's Wear Daily (WWD), Fox Business, Men's Global, The Telegraph, Sports Illustrated, Cosmopolitan, Inside Edition, Travel + Leisure, Red Bull blog, Lonely Planet, Huffington Post, Teen Vogue, Emirates Woman, The Weather Channel, The Independent, Experience Life, Uproxx, Seeker, The Daily Mail, CNN, The Straits Times, CNN Travel, Men's Journal, Forbes, Business Insider, The Points Guy, WGN9 Chicago News, Indy 100, A Plus, CT Post, Popsugar,

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<sup>48</sup> Nas Daily, LinkedIn, WWW.LINKEDIN.COM, <https://www.linkedin.com/company/nasdaily1/> (last visited April 29, 2021).

CTV News, Refinery29, US Weekly, Thrive Global, Thrillist, Money, Belle Mag, The Inertia, The Evening Standard, Equinox blog, Runner's World, Time, Travel Weekly, Ripley's Believe It Or Not, Citybase blog, Conde Nast Traveler, Yoga Matters, Elle, Treehugger, My Modern Met, Thrive Global, Tour Radar, Headline News / CNN, The New York Times, Gentside UK, Marie Claire, LifeHacker, WBUR News, Yahoo Finance, The Times of India, Deadline, Seeker, The Mirror UK and The Daily Mail. The vast majority of this press was extremely positive and unfortunately most of this press contained one of her misleading or deceptive claims of being the "first woman" or the "first documented woman" to travel to every country.

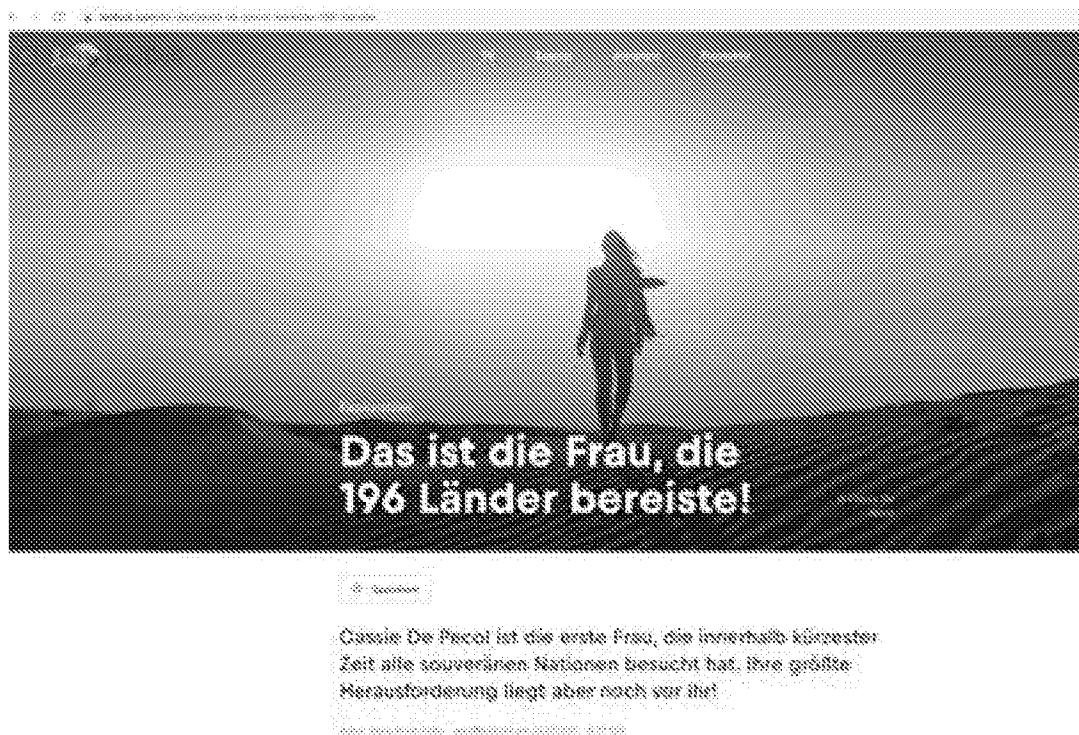
47. Though De Pecol did get significant press in the English-speaking world, and a bit in the Spanish and French speaking world, there is one language where she received no press for being the first woman to every country – German. Nina Sedano's original book, detailing her travels to every country, debuted in 2014 and sat on the German bestseller list for 60 weeks. Sedano has been featured in numerous press stories in the German speaking world regarding her travels to every country. Germans love travel and spend more on foreign travel than any other nation.<sup>49</sup> Sedano's books were a hit in a travel loving country and her books detailing her travels to every country on earth would be known to anyone writing about travel in the German language. Red Bull, the popular energy drink, is headquartered in Fuschl am See, Austria. People speak German in Austria. Red Bull wrote an article about defendant for their blog and interestingly, the German and English versions are significantly different.

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<sup>49</sup> 'Humourless and nude': The truth about German holidaymakers, *The Telegraph*, (February 28, 2017), <https://www.telegraph.co.uk/travel/destinations/europe/germany/articles/german-tourists-the-stereotypes-and-the-truth/>.



The English version of the Red Bull blog (above)



The German version of the Red Bull blog (above)

The English text reads “(Title) On Record: First Woman to Travel to 196 Countries (Text) Cassie De Pecol became the first and fastest woman to visit every sovereign nation in the world, but her biggest challenge is still ahead.”<sup>50</sup> However, the German version reads “(Title) This is the woman, who visited 196 Countries! (Text) Cassie De Pecol is the first woman, who visited every sovereign nation in such a short amount of time but her biggest challenge is still ahead.”<sup>51</sup> The German version is correct, the English version is not.

48. When defendant ended her trip in February 2017 she appeared on CNN,<sup>52</sup> NBC,<sup>53</sup> and Headline News<sup>54</sup> with claims of being the first woman to travel to every country (see screenshots below). She got press pieces in outlets like Forbes,<sup>55</sup> Popsugar,<sup>56</sup> Travel + Leisure,<sup>57</sup> all claiming the same. Significant press from much of the world echoed the “first woman to travel to every country” claim. That claim certainly did not come from Guinness World Records, so it clearly originated from defendant. After the “first woman” claim was very poorly received online in early February, defendant later seemed to

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<sup>50</sup> Mary Anne Potts, *On Record: First Woman to Travel to 196 Countries*, Red Bull (July 7, 2017), <https://www.redbull.com/us-en/first-female-travel-every-country-world-record>.

<sup>51</sup> Mary Anne Potts, *Das ist die Frau, die 196 Länder bereiste!*, Red Bull (July 7, 2017), <https://www.redbull.com/de-de/cassie-de-pecol-bereiste-196-laender>.

<sup>52</sup> First Woman to Travel to Every Country, CNN, <https://www.cnn.com/videos/us/2017/02/10/first-woman-to-travel-to-every-country-cassie-depecol-orig.cnn> (last visited March 10, 2022).

<sup>53</sup> TODAY - YouTube, *Cassie De Pecol is the First Woman to Travel Solo to Every Country on Earth* | TODAY, <https://www.youtube.com/watch?v=E9Ik7zxLe2Y> (last visited March 10, 2022).

<sup>54</sup> Michaela Pereira, *Twitter*, WWW.TWITTER.COM, <https://twitter.com/Michaela/status/832673986374799361> (last visited April 29, 2021).

<sup>55</sup> Laura Begley Bloom, *A 27-Year-Old Just Became The Fastest Woman To Visit Every Country*, FORBES, (Feb 14, 2017) <https://www.forbes.com/sites/laurabegleybloom/2017/02/14/a-27-year-old-just-became-the-first-woman-to-visit-every-country-on-earth/>.

<sup>56</sup> Kathryn M., *Meet the Woman Who Visited Every Country Across the Globe - and Broke 2 World Records!* POPSUGAR, <https://www.popsugar.com/news/First-Woman-Travel-Every-Country-World-44554495>.

<sup>57</sup> Cailey Rizzo, *27-year-old Becomes First Woman to Visit Every Country in the World*, TRAVEL + LEISURE, <https://www.travelandleisure.com/trip-ideas/cassie-de-pecol-first-woman-visit-every-country> (last visited April 29, 2021).

switch occasionally to the “first documented women” claim which, again, the travel community strongly disputed and was never certified by Guinness World Records or any record or travel organization.



NBC News correspondent Jenna Bush Hager introducing the Cassie De Pecol story on March 14, 2017.<sup>58</sup> The NBC News banner states that De Pecol is the “first woman to travel to every country in the world.” De Pecol is not the first woman to travel to every country in the world.

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<sup>58</sup> *Meet Cassie De Pecol, first woman on record to travel alone to every country in the world*, TODAY, (March 14, 2017), <https://www.today.com/video/meet-cassie-de-pecol-first-woman-on-record-to-travel-alone-to-every-country-in-the-world-897455683591>.



Headline News correspondent Michaela Pereira tweets out to watch the story about the “FIRST woman to visit every country in the world.” Defendant is not the first woman to visit every country in the world.

49. Stefan Krasowski founded a popular Facebook group for people who have traveled to every country and those who aspire to travel to every country. According to *The New*

*York Times*, Krasowski is a points and miles expert.<sup>59</sup> His blog is called *Rapid Travel Chai*. He is currently a member of the Travelers Century Club (TCC) board.<sup>60</sup> As he personally knows women like Audrey Walsworth who traveled to every country well before February 2017, he was concerned by the press he was seeing regarding De Pecol. On February 15, 2017, he tweeted “The Women Who Have Traveled to Every Country in the World (Media Fact-Checking Guide)” and included a link to his blog<sup>61</sup> The following are images from that blog post:



Here one can see the claims made by De Pecol as of February 15, 2017. None of the claims were verified by anyone in the traveling community, Guinness World Records or any travel certification organization.

<sup>59</sup> Jamie Lauren Keiles, *The Man Who Turned Credit-Card Points Into An Empire*, THE NEW YORK TIMES, (January 5, 2021), <https://www.nytimes.com/2021/01/05/magazine/points-guy-travel-rewards.html>.

<sup>60</sup> Travelers Century Club, WWW.TRAVELERSCENTURYCLUB.COM, <https://travelerscenturyclub.org/> (last visited March 7, 2022).

<sup>61</sup> Stefan Krasowski, *The Women Who Have Traveled To Every Country in the World (Media Fact-Checking Guide)*, RAPID TRAVEL CHAI, (February 15, 2017) <https://rapidtravelchai.boardingarea.com/women-traveled-every-country-world/>.

## Why Are So Many of the Most Traveled People in the World Up in Arms?

What has gotten so many travelers upset, particularly female travelers, is the claim 'First Documented Woman to Travel to Every Sovereign Nation' seems to deliberately dismiss the pioneering female travelers who have preceded Ms. DePecol in this achievement.

Rather than a 'on the shoulders of giants approach' and celebrate her crowning as youngest American to visit every country, the apparent intent, and definite result, is that the media have construed that into, 'The First Woman to Travel to Every Country.'

Krasowski highlights here that De Pecol is intentionally working to dismiss the female travelers who went before her.

That major news outlets such as CNN did not perform a simple search of other women who have completed this quest is a sad commentary on the state of media. That it was fed to them by Ms. DePecol, indeed touted and amplified in her Press Room, does not speak highly of her. She is billed as such for her upcoming appearance at the Women's Travel Fest, an event one assumes would want to recognize pioneering female travelers.

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Ms. DePecol's website makes no statement as to what she determines to be 'documented' and on what basis she excludes other women. Several acquaintances of mine, all involved in the traveler verification organizations mentioned below, have attempted to contact her for clarification in this area and have not received adequate response.

And here one can see that Krasowski believes, like Travelers United, that De Pecol was specifically feeding news organizations deceptive and misleading claims that she was the first woman to travel to every country, then walking back if anyone corrected her to "first documented" even though she was unable to define what that meant with Krasowski. As he notes in his blog, none of his contacts in the travel verification organizations certified any of her claims.

After tweeting out this information, De Pecol first tweeted back at him multiple times

stating, in three tweets, "If there's a woman who has traveled to every country and who



has the proof to show it, I'd love to see and I'd be very proud of them. But as of now, there's none."<sup>62</sup> Audrey Walsworth and Nina Sedano both told Travelers United that they had reached out to defendant. Defendant knew of their existence and purposefully ignored them despite this misleading tweet.<sup>63</sup>

50. After she posted the above three tweets, and many others, she blocked Krasowski on Twitter. She never joined his Facebook group, by far the most popular Facebook group dedicated to people who have traveled to every country in the world. She then responded to women who were tweeting about how De Pecol is not the first woman to travel to every country stating on twitter "never claimed to be the first woman but the first "documented" woman. A.K.A. Proof to back it up"<sup>64</sup>



Here defendant states she never claimed she was the first woman, but the first "documented" woman. Information on her own website at the time promoted her as the first woman to travel to every country and she promoted stories that simply said first woman to the top of her press room. Only when people dispute her claims, does she come out with modifiers such as "documented." Defendant continues this misleading and deceptive behavior today.

<sup>62</sup> Stefan Krasowski, *The Women Who Have Traveled To Every Country in the World (Media Fact-Checking Guide)*, RAPID TRAVEL CHAI, (February 15, 2017), <https://rapidtravelchai.boardingarea.com/women-traveled-every-country-world/>.

<sup>63</sup> Rick Gazarian and Lee Abbamonte, *Lee Abbamonte - 193 countries ... and the North and South Pole!* GLOBAL GAZ, (last visited April 29, 2021) <https://globalgaz.com/lee-abbamonte-193-countries-north-south-pole/>.

<sup>64</sup> Cassie De Pecol, *Twitter*, WWW.TWITTER.COM, <https://twitter.com/cassiedepocol/status/833151503938486272> (last visited March 7, 2022).

51. After Krasowski's post went up, another popular travel blogger followed with another similar piece. Gary Leff, who runs the *View from the Wing* blog and was named a Top Travel Expert by *Conde Nast Traveler*, wrote on his blog February 17, 2017 "FAKE NEWS: Cassie DePecol Not Actually First Woman to Travel to Every Country in the World?" He wrote that when he saw defendant get an incredible amount of press for being the first woman to visit every country in the world, he simply didn't believe it as it seemed unbelievable that a woman hadn't done this yet. He wrote how indeed it was not correct to write that she was the first woman to visit every country. The piece then goes on to echo what Krasowski wrote on *Rapid Travel Chai* and state that "there is no need for her achievement to diminish the accomplishments of other women who have come before her."<sup>65</sup>
52. Slightly after these posts went on the internet, the Women's Travel Fest occurred in New Orleans from March 3-5, 2017. Defendant was a featured speaker with her claim of being the "First Documented Woman to Visit Every Country in the World." Travelers United spoke with people who attended the event. They stated that it was pointed out to De Pecol at the event that defendant was not the first woman to travel to every country documented or not. Defendant allegedly appeared upset, left and has never returned to a travel conference.
53. De Pecol continued to relentlessly push the "first documented woman to travel to every country" narrative to reporters even though not one person in the well-traveled American

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<sup>65</sup> Gary Leff, *FAKE NEWS: Cassie DePecol Not Actually First Woman to Travel to Every Country in the World?* VIEW FROM THE WING, <https://viewfromthewing.com/fake-news-cassie-depecol-not-actually-first-woman-travel-every-country-world/> (last visited April 29, 2021).

community or any third-party organization had confirmed defendant's claim. On April 24, 2017 she made *Forbes* update an article about her. *Forbes* writes:

"4/24/17 Update: This headline of this story was changed to reflect that Cassie De Pecol was the first "woman on record" to visit every country on earth. De Pecol clarified her achievement in the following statement: "I am the 'first woman/female on record' and 'first documented woman/female' to have traveled to every Sovereign Nation. The key facts in my statements being 'on record' and 'documented.' I collected copious amounts of legitimized evidence from every Sovereign Nation I visited during my travels and submitted that evidence to Guinness World Records to break two records: the first for 'Fastest Time to Travel to All Sovereign Countries;' and the second for 'Fastest Time to Travel to All Sovereign Countries (female)' I am unaware that any other female has documented her travels to every Sovereign Nation, let alone with the rapidity with which I accomplished the feat. Guinness World Records is also unaware of any other female who has documented her similar travels (otherwise they would not have given me the two awards)." <sup>66</sup>

As previously stated, De Pecol was well aware of the female travelers who went before her. Walsworth and Sedano both said that they contacted De Pecol. De Pecol ignored their accomplishments so she could push her own false narrative to gain more social media followers and be more successful as an influencer. Guinness World Records explicitly stated that this was not a record for the first female to visit every country but rather that this was an award for quickest travel to every country by speed.<sup>67</sup> Sedano and Walsworth both stated to Travelers United that they did not travel for speed, they traveled to see each country. Since they were never in a speed contest to race through the world's airports, they never would have paid Guinness World Records to certify their travels. Sedano did, however, have her travels verified by third-party travel verification site

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<sup>66</sup> Laura Begley Bloom, *A 27-Year-Old Just Became The Fastest Woman To Visit Every Country*, FORBES, (April 29, 2021) <https://www.forbes.com/sites/laurabegleybloom/2017/02/14/a-27-year-old-just-became-the-first-woman-to-visit-every-country-on-earth/>.

<sup>67</sup> Janice Lintz, *Is The Media Spreading Fake News?*, THE HUFFINGTON POST, (April 29, 2021) [https://www.huffpost.com/entry/is-the-media-spreading-fake-news\\_b\\_59209876e4b0e8f558bb2716](https://www.huffpost.com/entry/is-the-media-spreading-fake-news_b_59209876e4b0e8f558bb2716).

NomadMania. De Pecol never had her travel verified by NomadMania, likely because she would not be able to certify her travels with them as they do not count airport visits as a visit to the country.

54. Travelers United spoke with dozens of well-traveled people, people who work in extreme travel and members of the TCC, NomadMania and Most Traveled People before filing this complaint. Travelers United could not find one well-traveled American who believed that De Pecol was the first woman or the first documented woman to travel to every country. People in the extreme travel world expressed concern that since defendant was the first woman who ever was bold enough to publicly lie to the press about her travel accomplishments, she was able to block out anyone that disputed any of her claims on social media. This allowed her to echo her false claims on Instagram where, because of her large following the press and public seemed to believe the claims as if they were the truth. The well-traveled people Travelers United spoke with noted that De Pecol had been making claims about being the “first woman” or the “first documented woman” for quite a while despite numerous people in the travel community correcting her since 2015. In 2015, before she started her travels, defendant went to the World Domination Summit, a conference, stood on stage and declared she would be the first documented woman to every country,<sup>68</sup> a claim that was already impossible because it had already been accomplished. Since then people in the travel community said they had attempted to correct her in person, via email or online through social media. She blocked anyone on social media who disagreed with her, ignored emails or responded with insults back. De Pecol responded to people who tried to correct her or point out the women who went

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<sup>68</sup> World Domination Summit, *Cassie De Pecol 2018 Speaker*, <https://world domination summit.com/speaker/cassie-de-pecol> (last visited March 8, 2022).

before her by calling them haters or saying they were jealous. She wrote on August 31, 2017 at 3:05pm on Twitter “The hate that I receive from fellow travelers and bloggers = fuel to my fire to live the best life possible.”<sup>69</sup> About an hour later at 4:35pm she wrote “I’m not giving them credit individually, but rather as a whole, describing them as the meaningless ants at which they are.”<sup>70</sup> Fifteen minutes later she wrote “They need to know their worth, which is nothing”<sup>71</sup> She then wrote “They’re envious of my achievements and miserable that they can’t compete.”<sup>72</sup>

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<sup>69</sup> Cassie De Pecol, Twitter, (Aug 31, 2017 3:05 PM), <https://twitter.com/cassiedepecol/status/903332881224712192>.

<sup>70</sup> Cassie De Pecol, Twitter, (Aug 31, 2017 4:35 PM), <https://twitter.com/cassiedepecol/status/903355682627371008>.

<sup>71</sup> Cassie De Pecol, Twitter, (Aug 31, 2017 4:50 PM), <https://twitter.com/cassiedepecol/status/903359442900492288>.

<sup>72</sup> Cassie De Pecol, Twitter, (Aug 31, 2017 4:21 PM ), <https://twitter.com/cassiedepecol/status/903352142257201152>.

← Tweet



Cassandra De Pecol  
@cassiedepocol

...

The hate that I receive from fellow travelers and bloggers = fuel to my fire to live the best life possible.  
#takeheed #riseabove 🌟

3:06 PM · Aug 31, 2017 · Twitter for iPhone

1 Retweet 20 Likes



Cassandra De Pecol @cassiedepocol · Aug 31, 2017

...

Replying to @DPerisR

I'm not giving them credit individually, but rather as a whole, describing them as the meaningless ants at which they are. 🐜



Cassandra De Pecol @cassiedepocol · Aug 31, 2017

...

Replying to @DPerisR

They need to know their worth, which is nothing. If they judge others. You wouldn't let a killer get away with murder, would you?



Cassandra De Pecol @cassiedepocol · Aug 31, 2017

...

They're envious of my achievements and miserable that they can't compete. Envy is a sad, sad thing.



55. Defendant then went to the press saying people were being mean to her online.<sup>73</sup>

Travelers United has no doubt that some people were likely being cruel online for no reason as that is an unfortunate situation for women who participate in social media,

<sup>73</sup> Kirrily Schwarz, *Cassie de Pecol has travelled to every country on Earth, but questions are being asked*, NEWS.COM.AU, <https://www.news.com.au/travel/travel-updates/travel-stories/cassie-de-pecol-has-travelled-to-every-country-on-earth-but-we-have-some-questions/news-story/618c87cee38b4ff3ae55b57feecf89e1> (last visited March 8, 2022).

however looking through Twitter today most of the tweets from 2017 that are currently visible are people telling her that she was not the first woman to travel to every country, questioning why she spent such little time in each country or wondering why she was trying to spread a message of sustainability when she was racing around the world on airplanes. All legitimate questions that the defendant clearly did not want to answer.

56. Defendant claimed she had friends in the extreme travel community and insinuated they supported her claims. In one email, later published online, defendant wrote “I’m friends with Lee [Abbamonte], and many other men who have been to every country...”<sup>74</sup> That is quite contrary to what Abbamonte himself said. Lee Abbamonte is an American travel blogger and influencer who has traveled to every country and who has almost completed the entire TCC list.<sup>75</sup> He currently has an Instagram account with 92,600 followers. He has been active in the extreme travel community for over a decade. Abbamonte was asked about defendant in March of 2017 on the Counting Countries podcast hosted by Ric Gazarian. This is what Abbamonte had to say:

“Before she started this... I got an email from her back in like, I guess it was 2015, I don’t even know, I still have it, and she was telling me what she wanted to do... I’ve never spoken to her but I have emailed her both before and after. You know it’s funny before she told me she was going to become the, uh, first woman to go to every country and I rem – I still have the email, I actually emailed her back, there has been at least three or four that have done it, and I know a couple of them and I never actually got a response after that email back in 2015... Then she got a lot of press... along the way I think she rubbed a lot of people the wrong way and she handled things poorly and she would become defiant and kind of attack people and then she would block people if they would call her out on social media... I think, uh, she might of gotten a little drunk on the attention and maybe overstated what

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<sup>74</sup> Janice Lintz, *Is The Media Spreading Fake News?*, THE HUFFINGTON POST, (April 29, 2021) [https://www.huffpost.com/entry/is-the-media-spreading-fake-news\\_b\\_59209876e4b0e8f558bb2716](https://www.huffpost.com/entry/is-the-media-spreading-fake-news_b_59209876e4b0e8f558bb2716).

<sup>75</sup> Lee Abbamonte, *List of all the countries in the world*, WWW.LEEABBAMONTE.COM, <https://www.leeabbamonte.com/list-of-all-the-countries-in-the-world> (last visited April 29, 2021).

she did with the first woman thing. Now she is saying first documented women which to me is kind of even worse to be honest because it is disingenuous at best and at worst it is completely false.”<sup>76</sup>

57. Defendant continues to make misleading and deceptive statements that she has a Guinness World Record for being the first woman to travel to every country on her multiple social media channels. Guinness World Records never gave her a record for being the first woman to visit every country. Here are just three examples. One from 2017 on Twitter<sup>77</sup>, one from 2019 on Twitter<sup>78</sup> and the later from 2021 on TikTok.<sup>79</sup>

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<sup>76</sup> Rick Gazarian and Lee Abbamonte, *Lee Abbamonte - 193 countries ... and the North and South Pole!* GLOBAL GAZ, (last visited April 29, 2021) <https://globalgaz.com/lee-abbamonte-193-countries-north-south-pole/>.

<sup>77</sup> Cassie De Pecol, *Twitter*, WWW.TWITTER.COM, <https://twitter.com/cassiedepecol/status/832054218072666113> (last visited April 29, 2021).

<sup>78</sup> Cassie De Pecol, *Twitter*, WWW.TWITTER.COM, (Feb 2, 2019 3:10AM), <https://twitter.com/OnThisDayShe/status/1091609730521407488>.

<sup>79</sup> Cassiedepecol, Comment to *Welcome to 196 countries TikTok*, TIKTOK (April 29, 2021, 8:28 PM) <https://vm.tiktok.com/ZMex4LCT5/>.



← Tweet



**Forbes** @Forbes · Feb 15, 2017

This 27-year-old is the first woman to visit every country on earth  
[on.forbes.com/8Q128pNhj](http://on.forbes.com/8Q128pNhj)



29



471



678



**Camacho, D. I.** @diegocamacho · Feb 15, 2017

how can we possible know she's the first?



1



3



**Cassandra De Pecol**

@cassiedepocol

Replying to @diegocamacho and @Forbes

**Guinness world records**

8:20 PM · Feb 15, 2017 · Twitter for iPhone



This is a deceptive tweet on Twitter from February 15, 2017. Forbes later issued four corrections related to this one article.

← Tweet

Cassandra De Pecol Retweeted



On This Day She  
@OnThisDayShe

#otd in 2017 Cassandra de Pecol set two world records: the fastest person, and the first documented woman, to visit all 196 sovereign countries in the world. Her trip, for the Intl Institute of Peace Through Tourism, took a year & 193 days.  
[edition.cnn.com/travel/article...](http://edition.cnn.com/travel/article...) @cassiedepecol

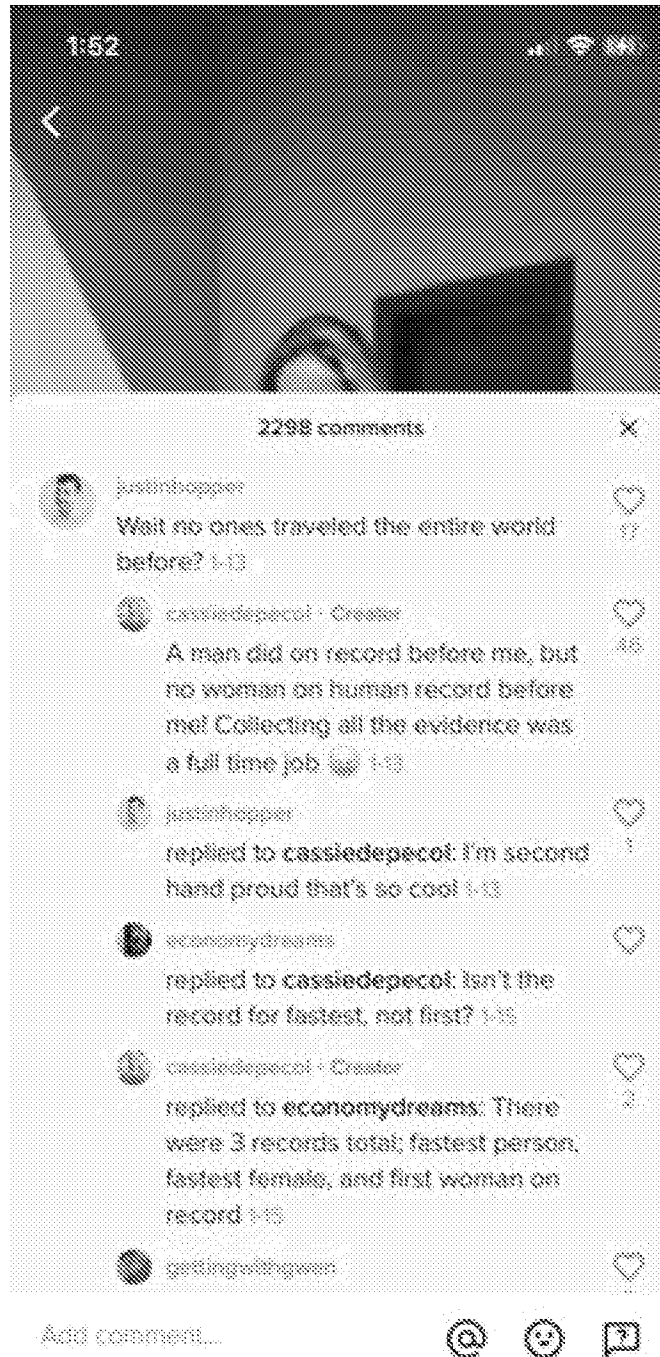


3:10 AM · Feb 2, 2018 · Twitter Web Client

20 Retweets · 1 Quote Tweet · 85 Likes

This is a deceptive Tweet defendant retweeted on February 2, 2019<sup>80</sup> that says she has a world record for “the first documented woman to visit all 196 sovereign countries in the world.” Defendant does not have a world record as the first documented women to visit all 196 sovereign countries.

<sup>80</sup> Cassie De Pecol, *Twitter*, WWW.TWITTER.COM, (Feb 2, 2019 3:10AM), <https://twitter.com/OnThisDayShe/status/1091609730521407488>.



This is her deceptive response to a TikTok comment on January 15, 2021.<sup>81</sup> She never received a Guinness World Record for being the “first woman on record.”

<sup>81</sup> Cassiedepecol, Comment to *Welcome to 196 countries TikTok*, TIKTOK (April 29, 2021, 8:28 PM) <https://vm.tiktok.com/ZMex4LCT5/>.

58. On May 22, 2017, Janice Lintz, an attorney, Travelers Century Club (TCC) member and journalist wrote a piece for *The Huffington Post* titled “Is The Media Spreading Fake News?” Lintz wrote “We seem to live in a world where someone can declare something and the claim becomes a headline.”<sup>82</sup> The piece details the women who have actually traveled to every country on earth long before De Pecol and the problems of media outlets parroting De Pecol’s claims. Guinness World Records confirmed to Lintz that they never certified De Pecol as the first woman to travel to every country. Guinness, through Sofia Rocher, Public Relations Coordinator for Guinness World Records North America, Inc., stated:

“One of the requirements for categories to be recognized as Guinness World Records titles is that the record needs to be breakable. Therefore, a record for the first woman to visit every country would not be recognized by our company since it wouldn’t be breakable by other individuals.”

59. *The Huffington Post* piece details how Lintz asked De Pecol questions she viewed as challenging which was different than the other puff pieces journalists wrote about Defendant. De Pecol did not like being asked tough questions. While the piece was being written, De Pecol legally threatened Lintz via email stating “You should not go forward with anything having to do with me unless and until the matter is resolved to my satisfaction. You should not communicate with me, but rather, direct any and all further communications to Attorney Grimes, copying the other members of his firm. Cassie.”<sup>83</sup>

60. Defendant aggressively pursued press, sending them misleading and deceptive information about her being the first woman to travel to every country, pushing the

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<sup>82</sup> Janice Lintz, *Is The Media Spreading Fake News?*, THE HUFFINGTON POST, (April 29, 2021) [https://www.huffpost.com/entry/is-the-media-spreading-fake-news\\_b\\_59209876e4b0e8f558bb2716](https://www.huffpost.com/entry/is-the-media-spreading-fake-news_b_59209876e4b0e8f558bb2716).

<sup>83</sup> Janice Lintz, *Is The Media Spreading Fake News?*, THE HUFFINGTON POST, (April 29, 2021) [https://www.huffpost.com/entry/is-the-media-spreading-fake-news\\_b\\_59209876e4b0e8f558bb2716](https://www.huffpost.com/entry/is-the-media-spreading-fake-news_b_59209876e4b0e8f558bb2716).

stories that promoted her as the “first woman to travel to every country” to the top of her list of news stories on her website and threatening press when they wrote anything negative about her. A TravelPulse columnist wrote on February 22, 2017, that defendant’s claims to have visited 196 sovereign nations means that she hasn’t traveled to places like Antarctica and highlighting how “even Ms. De Pecol hasn’t been everywhere.” De Pecol did not travel to Antarctica as part of her race to every country for Guinness World Records. An interesting editor’s note at the top suggests De Pecol strongly did not like the suggestion that she hadn’t been everywhere. De Pecol got TravelPulse to issue the following Editor’s Note:

“In writing this column, the author misidentified some facts about Cassie De Pecol after about her exploits and failing to confirm with her directly. It was never the purpose of this column to attack Ms. De Pecol nor minimize her considerable efforts, but simply to point out even the most well-traveled among us have destinations and experiences to search out. We’d like to thank her for reaching out to TravelPulse in order to correct the matter. Both the author and the editorial staff would like to sincerely apologize and encourage our readers to not only check out Cassie’s website/blog but also to follow in her footsteps by getting out there and seeing the world for yourselves.”<sup>84</sup>

61. After Lintz’ *Huffington Post* piece came out, numerous news stories were corrected. The “First Woman” claims were often replaced by the actual Guinness World Record of “Fastest Woman” and “Fastest Person to visit all sovereign nations,” a legitimate and accurate correction. Travelers United finds it very unfortunate that De Pecol did not just stick to her true and very impressive legitimate claim of being at the time the fastest woman – and person – to travel to every country according to Guinness World Records. De Pecol unfortunately warped her legitimate claim into misleading and deceptive claims in an attempt to erase women’s history for her own financial benefit.

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<sup>84</sup> Brian Major, *A First Time for Everything*, TRAVELPULSE, February 20, 2017, <https://www.travelpulse.com/opinions/column/a-first-time-for-everything.html>.

62. Some news outlets at the time, however, instead of correcting their stories accurately to the “fastest person to visit all countries” unfortunately instead added one of De Pecol’s commonly used modifiers to her original claim of being the first woman. NBC News updated their De Pecol piece to “Meet Cassie De Pecol, first woman on record to travel alone to every country in the world.” Guinness World Records never certified her as the first woman to travel alone to every country in the world. No travel organization certified that De Pecol traveled to every country alone. Travelers Century Club, Most Traveled People and NomadMania all told Travelers United that NBC News never contacted them to verify this claim. Nina Sedano, the German woman who wrote a best-selling book about traveling to every country before De Pecol even began her trip, also said NBC News never contacted her. Before filing this complaint, Travelers United spoke with dozens of extremely well-traveled Americans and people who worked in the American travel industry to ask where this NBC News claim could have originated from. No one knew. So where was NBC News getting this information from? The only source of this information was likely De Pecol herself.

63. Defendant, by May 2017, was getting criticism for her “first woman to travel to every country” claim, in addition to her “first documented woman to travel to every country claim” so to some outlets it appears she spun to “first woman on record to travel alone to every country on earth” with the alone being the new modifier. Merriam-Webster Dictionary defines alone as “separated from others.”<sup>85</sup> Defendant’s social media posts certainly do not suggest she was separated from others in her travels. In a TikTok video posted on February 27, 2021, she states “The border crossing from Israel to Palestine was

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<sup>85</sup> Merriam-Webster, *Alone*, WWW.MERRIAM-WEBSTER.COM, <https://www.merriam-webster.com/dictionary/alone> (last visited April 29, 2021).

a really sad, scary and time-consuming experience to endure as a foreigner, let alone as a local Palestinian. I entered with my friend who was a Palestinian.”<sup>86</sup> In addition to traveling with friends, she talks about using guides and staying with hosts. The concept of generally traveling solo as a woman may be shocking to some, but not to the women who already traversed the globe well before defendant. Nina Sedano, the German woman who has traveled to every country, had her travels certified by a travel organization and wrote three books about her world travels, was interviewed by the *Frankfurter Allgemeine Zeitung* in 2014. They asked “Sie reisen alleine. Warum?” (You travel alone. Why?) She responds, “Wenn man mit einem Partner reist, konzentriert man sich ja meist aufeinander. Alleine lernt man überall und standing Leute kennen.” (When you travel with a partner, you concentrate on each other. Traveling alone allows you to meet people everywhere.”)<sup>87</sup>

64. Aside from defendant admitting she traveled with others in her social media posts, certain countries such as Bhutan, Turkmenistan and North Korea forbid people traveling on an American passport from entering alone. Travelers United reached out to Koryo Tours, one of the largest providers of tours to North Korea, and asked them about defendant’s claims. Koryo’s General Manager, Simon Cockerell, stated that in terms of American travel to North Korea between 2010 and 2017 “travel alone wasn’t possible, and nothing solo or unplanned at all.”<sup>88</sup>

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<sup>86</sup> Cassie De Pecol, *Palestine Part 2*, TIKTOK, (April 29, 2021, 9:08 PM), <https://vm.tiktok.com/ZMeBTyvLG/>.

<sup>87</sup> *In Frankfurt ist am meisten los*, FRANKFURT ALLGEMEINE ZEITUNG, June 23, 2014, <https://www.faz.net/aktuell/gesellschaft/menschen/nina-sedano-hat-fast-200-laender-der-erde-bereist-12958926-p2.html>.

<sup>88</sup> Travelers United, *Who is the social media sheriff of Instagram?* TRAVELERS UNITED BLOG (March 2, 2022) <https://www.travelersunited.org/social-media-sheriff-of-instagram-facebook/>.

65. Though it was not possible to travel as an American alone to every country between 2015 to 2017, defendant likely asserted that she did to gain press and get more Instagram followers. What she likely did do is travel generally solo, joining up with friends, hosts, guides and tours when it was convenient or necessary. Women like Nina Sedano, however, did that long before her, and Sedano's accomplishments were even noted in major press such as the *Frankfurter Allgemeine Zeitung*.<sup>89</sup> Before Sedano, Walsworth traveled independently, often meeting up with friends or groups along the way, and long before the convenience of the internet.
66. Defendant clearly wanted to create a narrative that she was doing something uniquely dangerous that no woman had done before. Defendant likely calculated that made a better narrative for obtaining social media followers than simply being honest about setting an impressive record in traveling to every country the fastest. Yet many women had traveled across the world before and solo. There is an incredible amount of misinformation and over-exaggeration of the dangers of travel in defendant's social media posts. In the first North Korea video she posted on TikTok, she stated in the comments she "almost did not get out" of North Korea.<sup>90</sup> In the video itself, she says "I'm a US citizen and I traveled alone the same year Otto Warmbier was detained. I went through a tour agency in Beijing, one of only two at the time offering tours to US citizens." Simon Cockerell of Koryo tours told Travelers United that there were somewhere between twenty to thirty tour companies in Beijing that Americans could have joined to go to North Korea between 2010 and 2017. He stressed, though, no American was going alone, as they were

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<sup>89</sup> Friederike Haupt, *Reise um die Welt in 30 Jahren*, FRANKFURTER ALLGEMEINE ZEITUNG, (Aug 10, 2011), <https://www.faz.net/aktuell/rhein-main/frankfurt/192-staaten-bereist-reise-um-die-welt-in-30-jahren-11110084.html>.

<sup>90</sup> Cassie De Pecol, *North Korea*, TIKTOK, (April 29, 2021 9:36 PM), <https://vm.tiktok.com/ZMcSeL6WA/>.



all joining an organized tour group. Defendant made two TikTok videos and three YouTube videos about her travels to North Korea that included claims like a guard telling her “We are coming for you America.”<sup>91</sup> The videos contain significant misinformation about how Americans were allowed to travel around North Korea at the time. The internet, however, loves North Korea content.<sup>92</sup> Travelers United is concerned that people in the business of content creation, who use their videos to acquire more and more social media followers, so they can then turn to advertise and sell goods to those followers, should be truthful with their statements because these statements are the first step in acquiring new people to sell things to. The Nas Daily video that was released March 3, 2021 on YouTube opens by saying “This is the first woman in the world to visit every single country alone. Yes! Every single country by herself – including North Korea!”<sup>93</sup>

67. Defendant clearly has a history of producing her own content that is inaccurate and she also has a history providing press misleading and deceptive claims about her travels. Additionally, Travelers United is concerned because she provided misleading, deceptive and false statements about her travel goals when she was seeking funding for sponsorships to begin her travels. She knew unquestionably at the time that she was not the first woman to travel to every country<sup>94</sup> when she began her trip in 2015. De Pecol was widely profiled for raising \$188,000 from sponsors for her trip.<sup>95</sup> Unfortunately,

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<sup>91</sup> Cassie De Pecol, *North Korea Part Two*, TIKTOK, (April 29, 2021 9:39 PM), <https://vm.tiktok.com/ZMeSe4rty/>

<sup>92</sup> Jonathan Kaiman, *We went to North Korea. You asked hundreds of questions. Here’s what we found.*, THE LOS ANGELES TIMES, April 18, 2017, <https://www.latimes.com/world/asia/la-fg-north-korea-answers-20170428-htmlstory.html>.

<sup>93</sup> Nas Daily (Nuseir Yassin), *YouTube*, WWW.YOUTUBE.COM, <https://www.youtube.com/watch?v=vF4QHQCuu1s> (last visited April 29, 2021).

<sup>94</sup> Rick Gazarian and Lee Abbamonte, *Lee Abbamonte - 193 countries ... and the North and South Pole!* GLOBAL GAZ, (last visited April 29, 2021) <https://globalgaz.com/lee-abbamonte-193-countries-north-south-pole/>.

<sup>95</sup> Cailey Rizzo, *Cassie De Pecol Becomes First Woman To Visit Every Country*, YAHOO! FINANCE (February 13, 2017) <https://finance.yahoo.com/news/cassie-pecol-becomes-first-woman-180217401.html>.

according to her own website, she obtained that money through misleading and deceptive statements saying that she would be the “first woman to travel to every country.”

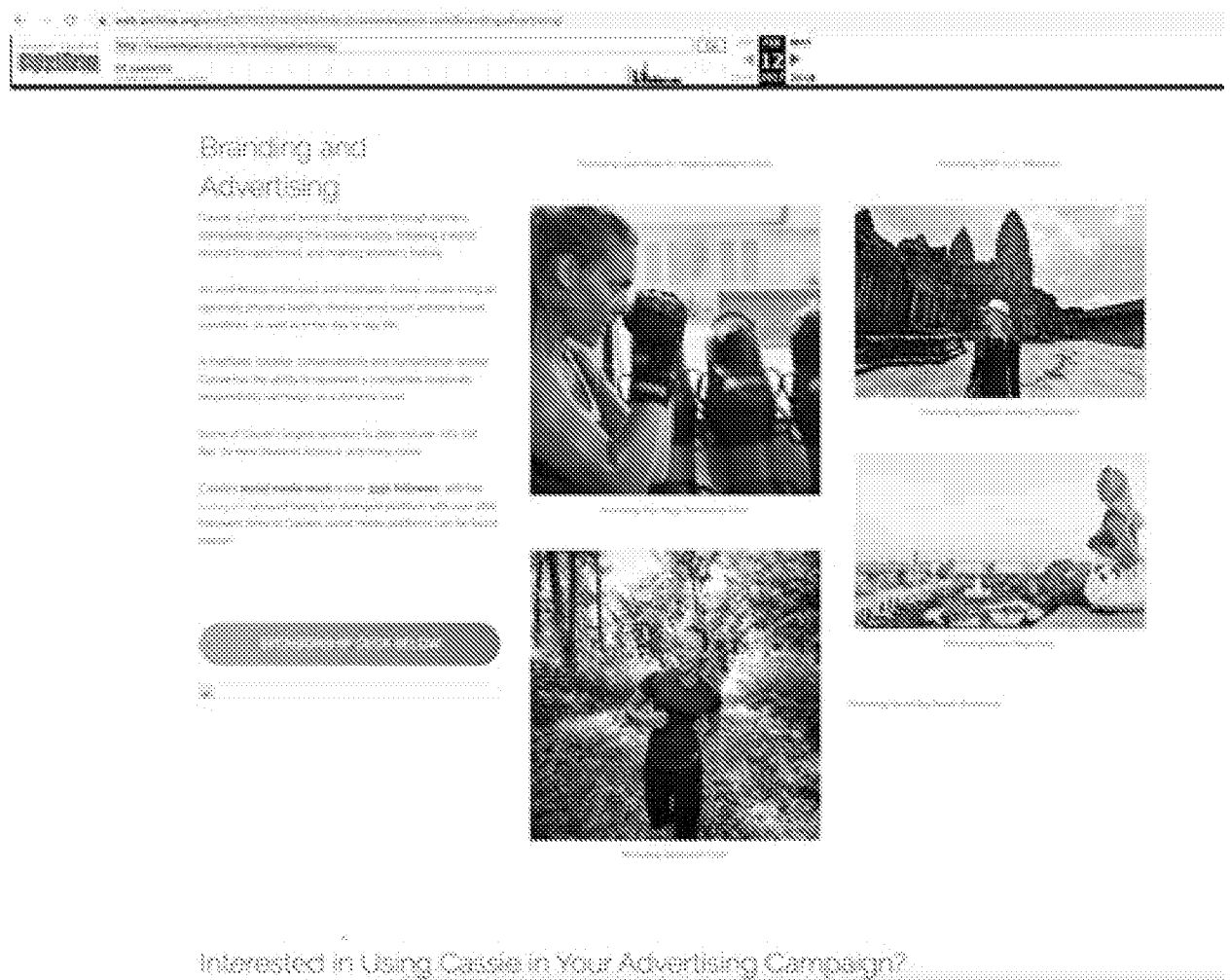
Defendant lied to her investors and sponsors in order to receive money for her trip.

68. Recently defendant was the featured guest on popular YouTube show, *The Iced Coffee Hour*. The show features Graham Stephan and Jack Selby as they talk to guests about topics related to money. Graham Stephan has 3.71 Million YouTube subscribers and is a popular social media figure on many channels, particularly YouTube, where he talks about money, investments, real estate, cars, Bitcoin, etc. De Pecol was featured on the September 6, 2020 episode of *The Iced Coffee Hour* with the headline “How to travel the ENTIRE world for \$10,000 | Cassie De Pecol.”<sup>96</sup> On the show, De Pecol tells of how she personally saved \$10,000 for her trip but managed to get \$188,000 by reaching out to investors and sponsors. Stephan showed her book, which states the misleading and deceptive claim, on the table for the entire interview. At 48:47 in the interview, Stephan asks “How do you get sponsors and investors?” and later at 49:14 asks “What is the return on investment?” Defendant answers “for a lot of these investors just honestly, to be completely honest, they wanted to give to a young girl who was going after like a humanitarian thing who didn’t have any money and who was working really hard...it was a philanthropic thing. Also I was like I will promote you like I’ll, and they were like NO I’m a private investor.” And Stephan jokes “NO. YOU DO NOT MENTION MY NAME EVER. NO PAPERWORK.” Unfortunately for defendant, there is documentation of what De Pecol was promoting to these people by what was listed on her website at the time. She was seeking money, sponsors and brand partnerships by making misleading

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<sup>96</sup> The Iced Coffee Hour, *How to travel the ENTIRE world for \$10,000 | Cassie De Pecol*, YouTube (Sept. 6, 2020), <https://www.youtube.com/watch?v=oT87g2qQVOA>.

and deceptive statements that she would be “the first woman to travel to every country in the world.” As archived and still accessible on the WayBack Machine website (a site that archives websites across the internet), De Pecol’s branding and advertising page appeared as the following on February 12, 2017:



69. Were someone to click on the sponsorship deck, they would see the following image:

# GUINNESS RECORD HOLDER, TRIATHLETE CASSIE DE PECOL

Having traveled 196 countries alone over the course of 1.5 years, Cassie has nearly broken the Guinness World Record for 'Fastest Female to Every Sovereign Nation' (breaking the previous male record in 1/2 the time!), while also being the First Woman to travel to every country in the world. An Ironman Triathlete and risk taker, traveling to countries such as Syria, Yemen and North Korea alone as a 27 year old, blonde American woman, she is releasing a book on Expedition 196, a short film, and a TV series. Here are just a few of her sponsors and branding agreements:

**BRAND AMBASSADOR**

Travel, Fitness, Women's Achievement, Nature Expeditions, Clothing

**WANT TO MANAGE CASSIE?**

**GET IN TOUCH!**

**SPECS**  
Age: 27  
Height: 5'7"  
Weight: 145

**E-MAIL, URL, PHONE**  
+1 203 739 9185  
info@expedition196.com  
www.expedition196.com

**WORK ADDRESS**  
Expedition 196, LLC  
100 Main St N #349  
Southbury, CT, 06488

Defendant very clearly here makes misleading, deceptive and fraudulent statements that she is “the First Woman to travel to every country in the World” hoping to attract brand partnerships and sponsors. She also claims to have traveled to North Korea alone as an American woman. This was not possible.

70. De Pecol obtained sponsors and big money based off of her main deceptive and misleading claim of being the first woman to visit every country, and those sponsors often repeat her false and misleading claims. These brands obviously think they are promoting women's achievement along with their own brand and they do not realize that De Pecol has worked incredibly hard to erase other women's accomplishments for her own financial benefit. Being an influencer is a relatively new job that exists due to the surge in social media use in the past ten years. De Pecol does not have any recent known employment other than promoting products on her social media channels in exchange for money. It is in her financial best interest to get her follower count as high as possible so she can get the biggest brand deals possible. Defendant has clearly exaggerated and lied about her travel accomplishments in violation of the CPPA. Every brand that repeats those claims is also in violation of the CPPA.

71. Red Bull makes a popular energy drink. They also sponsor many adventure athletes. It is unclear what De Pecol's financial relationship with Red Bull is. The German website for Red Bull featuring De Pecol noted that she went to every country the fastest (see paragraph 47) yet the English, French and Portuguese Red Bull blogs claimed she was the first woman to travel to every country. Red Bull then promoted their Cassie De Pecol story on their social media. Cassie De Pecol retweeted the stories from Red Bull France (in French),<sup>97</sup> Red Bull Portugal (in Portuguese),<sup>98</sup> Red Bull Ireland<sup>99</sup> and Red Bull UK.<sup>100</sup> Not surprisingly, De Pecol never tweeted the Red Bull story in German. The

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<sup>97</sup> Red Bull France, Twitter (Jul 26, 2017 12:15 PM), <https://twitter.com/RedBullFrance/status/890244250855776256>

<sup>98</sup> Red Bull Portugal, Twitter (August 3, 2017 6:00 AM), <https://twitter.com/redbullPOR/status/893048825660805121>

<sup>99</sup> Red Bull Ireland, Twitter (Jul 26, 2017 9:09 AM), <https://twitter.com/redbullIRE/status/890197262579769344>

<sup>100</sup> Red Bull UK, Twitter (Jul 19, 2017 6:04 AM), <https://twitter.com/RedBullUK/status/887614000460115972>

German Red Bull story was the only one that was correct. It did not anything about her being the first woman to every country, it only mentioned that she was the fastest person to every country. Clearly the German speakers at Red Bull knew De Pecol's claim was not true and they did not publish it. These Red Bull tweets were all viewed from the District. To knowingly lie in advertisements in order to attempt to impress more potential customers is a violation of the District's CPPA.



De Pecol retweeted this Red Bull UK tweet titled "Meet @CassieDePecol – the first woman to travel to 196 countries..." De Pecol is not the first woman to travel to 196 countries.

72. *Women's Wear Daily* wrote on January 30, 2018 "Venus Adds Facial Hair Removal to its Women's Assortment The first woman to travel to all 196 countries, Cassie De Pecol, is joining Venus as an ambassador to help introduce three new items retailers expect will jolt the women's hair removal business."<sup>101</sup> Again, De Pecol is not the first woman to travel to all 196 countries. This is a misleading and deceptive claim being used here to sell Venus hair removal products in violation of the District Consumer Protection Procedures Act.



Cassie De Pecol's Instagram post from February 13, 2018 promoting Venus razors.

<sup>101</sup> Faye Brookman, *Venus Adds Facial Hair Removal to its Women's Assortment*, WWD - Women's Wear Daily, (January 30, 2018), <https://wwd.com/beauty-industry-news/body-care/venus-adds-facial-hair-removal-11131913/>.

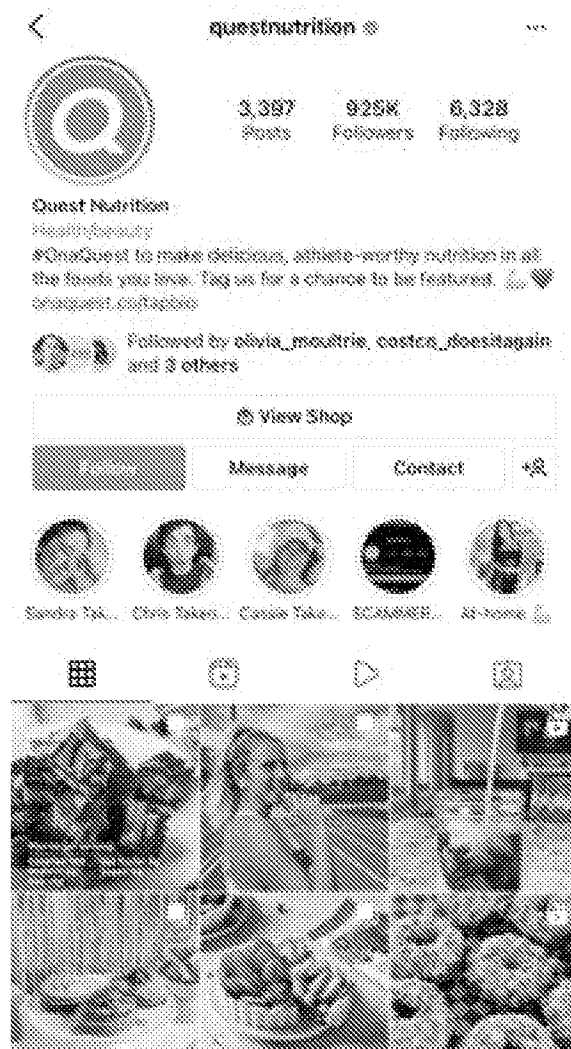


Venus promoted De Pecol on its brand's Instagram page on March 8, 2018 (above) as well as on February 14, 2018, February 2, 2018, March 25, 2018, April 24, 2018 and May 21, 2018. Many of these posts contain a link to De Pecol's Instagram account.

73. Quest Nutrition is a protein and energy bar company. Cassie De Pecol was hired by Quest as an influencer. She did a takeover of the official Quest Nutrition Instagram account



(@questnutrition) where they saved her stories at the top of their brand's page. She states "Hi Everyone! My name is Cassie De Pecol and I'm the first woman on record to travel every country in the world... I am so excited to be working with Quest for On a Quest." She uses the Quest Instagram account to show her eating Quest nutrition bars and gives customers a coupon code.



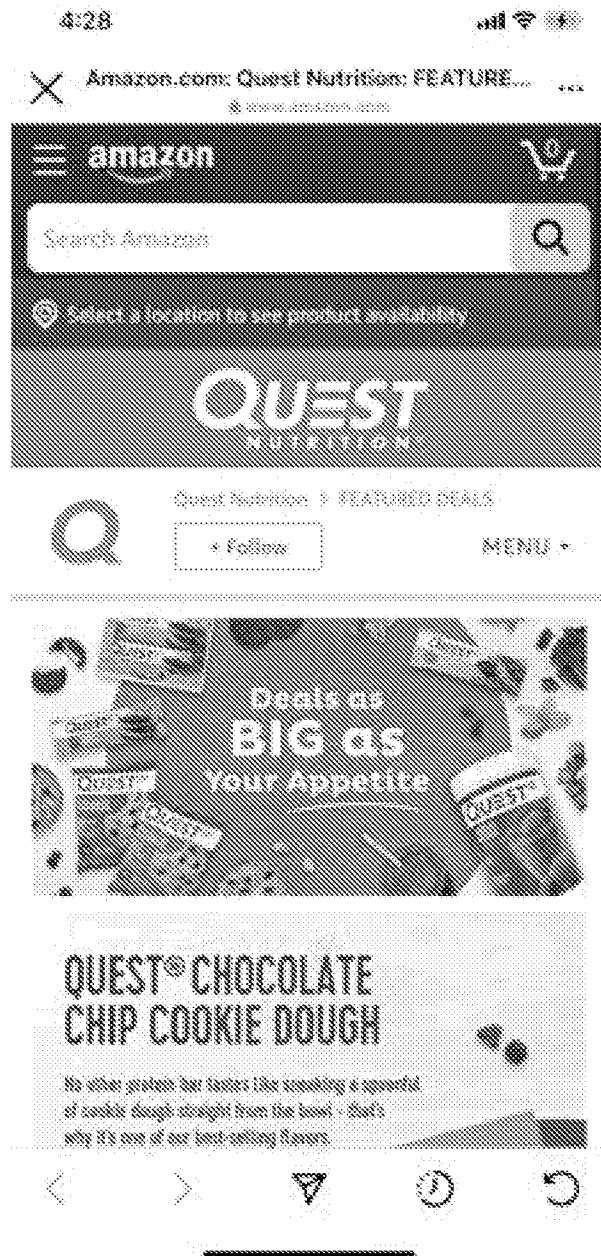
Quest Nutrition's official brand Instagram page (@questnutrition) has a Cassie Takeover on its saved Instagram stories. There De Pecol repeats her false claim that she is the first woman on record to travel every country in the world and she is shown using and promoting Quest products.

74. De Pecol further promoted Quest products on her Instagram account (@cassiedepecol).

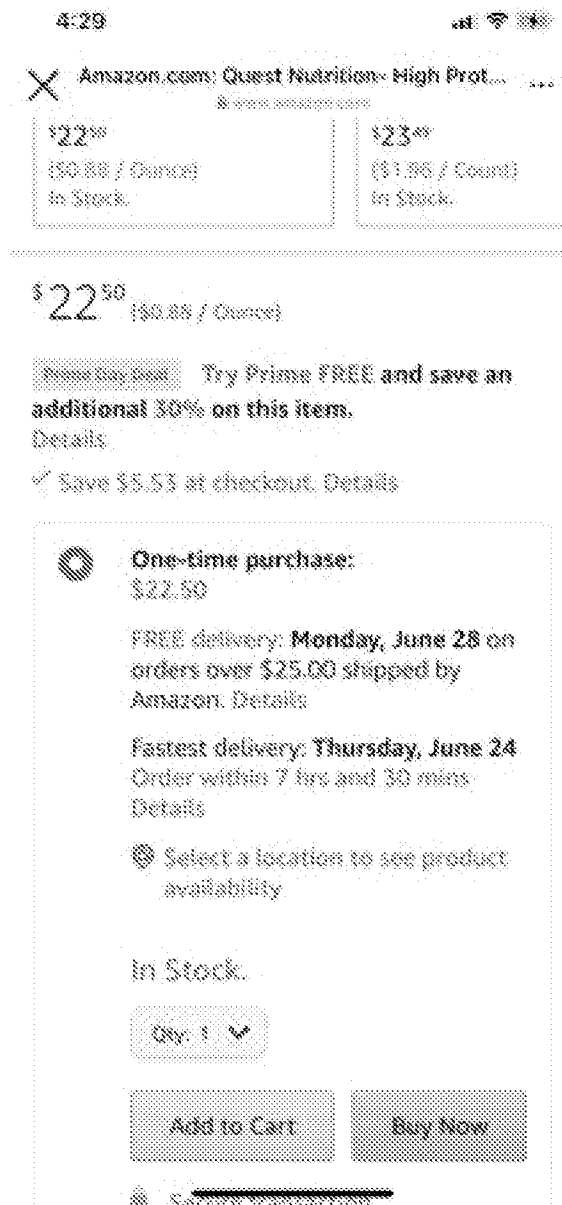
De Pecol put a link directly to Quest products in her Instagram account on June 21, 2021. Counsel for Travelers United, who lives and works in the District, was able to use her own personal Instagram account to click on De Pecol's Instagram link to Quest bars promotion on Amazon where she purchased the bars from Quest's Amazon page and had them sent to her house in the District. She spent \$10.22 after Prime Day discounts on the linked product – Quest Nutrition – High Protein, 2.12 Ounce Bars, 12 Count. These Instagram links, which can be the creation of people with totally fake claims, can clearly be used to influence and directly impact the sale of products in the District. These Quest protein bars, that the company promoted as being used by the “first woman on record to travel every country in the world” were not in fact used by the actual first woman on record to travel to every country in the world and thus were sold in violation of the District's CPPA.



Cassie De Pecol used her Instagram stories to promote the sale of Quest Nutrition products on June 21, 2021. Nowhere does she note that this is an advertisement or that she is getting free product or paid in exchange for this post.



A consumer in the District on June 21, 2021 could use De Pecol's link directly from her Instagram story to be taken to this Quest Nutrition page on Amazon.



That link would then take a consumer to purchase Quest bars on Amazon. Counsel for Travelers United was able to successfully purchase these bars using De Pecol's link on June 21, 2021 and have them delivered to her house in Washington, D.C.

75. De Pecol has likely either worked for or been given many free stays by Marriott

International, Inc. Again, this is highly unclear because she does not post if she is paid or being given a free stay when she promotes the hotel on her social media. Marriott

International, Inc. is a hotel company with 7,642 properties around the world. The

Marriott headquarters is in Bethesda, Maryland. Many residents of the District work at or

stay at Marriott hotels. On October 21, 2021 and October 14, 2021 she posted on Instagram from The Ritz-Carlton, Denver. On October 5, 2021, July 26, 2021 and July 22, 2021 she posted from El Mangroove Hotel, Autograph Collection. On October 25, 2019 she posted from the Boulder Marriott. On September 14, 2019, September 12, 2019 and September 11, 2019 she posted from The Ritz-Carlton, Bachelor Gulch. On December 13, 2018 (twice) and December 11, 2018 she posted from The Ritz-Carlton, Lake Tahoe. On November 4, 2018 she posted from The Ritz-Carlton Orlando, Grande Lakes. On August 9, 2018 and August 10, 2018 she posted from the Renaissance Boulder Flatiron Hotel. On March 18, 2018, March 1, 2018, February 28, 2018 and February 26, 2018 she posted from The Ritz-Carlton Half Moon Bay. On, November 8, 2019 she posted on her blog a four-paragraph review of how amazing the Boulder Marriott is.<sup>102</sup> All of these are Marriott International Hotels. In each of these posts, she talks about how great the hotel is, she tags the hotel as her location and she usually posts numerous photos of the hotel. These posts do not say they are an advertisement. Defendant does not say if she is being gifted these rooms. Consumers are obviously unlikely to know if this is an advertisement, which it likely is, because defendant and Marriott do not mention anything about these posts being advertised, sponsored or gifted. This is a violation of FTC influencer guidelines and it is a violation of the District's CPPA.

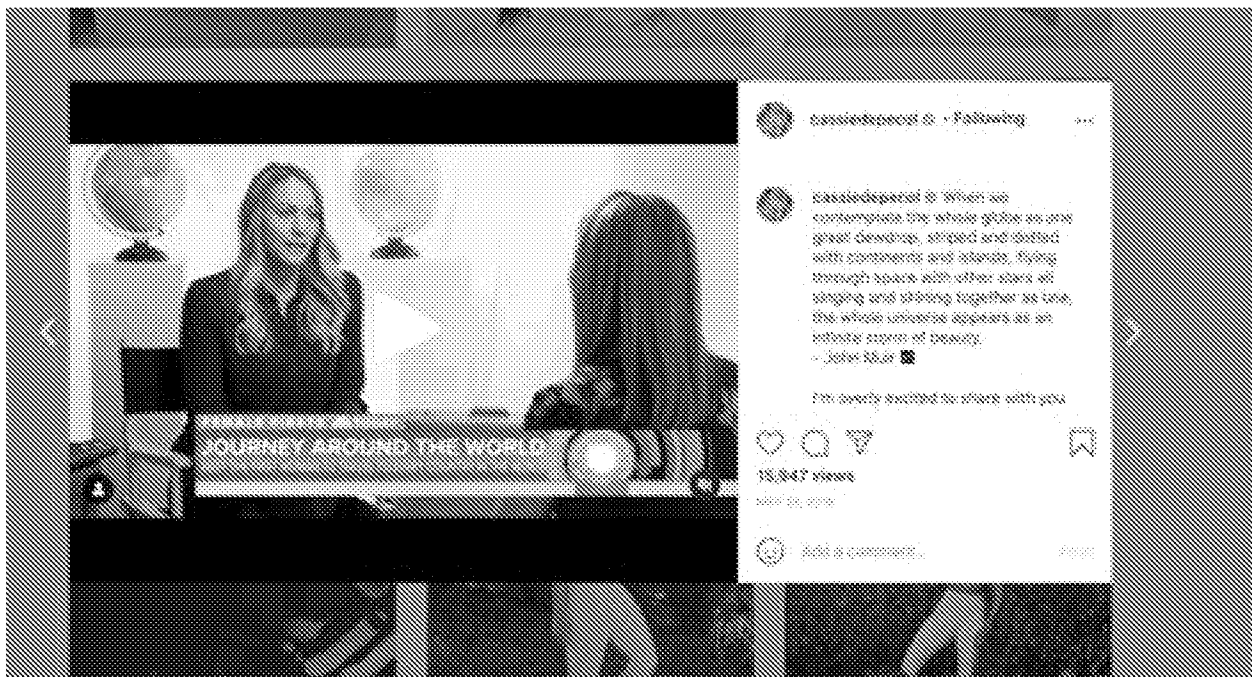
76. These brands, like much of the press before, are either doing no fact-checking or are purposefully ignoring the truthful information such as Lintz' *Huffington Post* article that prominently exist online, clearly going into elaborate detail about how defendant is not the first woman to travel to every country. The brands want to sell the message of

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<sup>102</sup> Cassie De Pecol. *Boulder Marriott*, (November 8, 2019), <https://cassiedepecol.com/boulder-marriott/>.

women's empowerment and defendant seems like someone who will sell that message on behalf of their brand, regardless of whether or not her claims are true. In 2019, De Pecol produced four video ads for Go Daddy. Go Daddy is a publicly traded internet domain registrar and web hosting company headquartered in Scottsdale, Arizona. Go Daddy revenue for 2019 was 2.988 billion dollars. They clearly have enough money for lawyers and fact checkers to review the advertisements they are releasing, but either those people were never called in to review De Pecol's content or her content was purposefully ignored. Go Daddy knew or should have known to have lawyers and fact checkers review influencer created content to make sure it was factual and compliant with advertising laws; however they clearly in the case of defendant never had anyone review the content. On May 28, 2019, De Pecol posted a video she made for Go Daddy, to her Instagram, Facebook and Twitter accounts. According to her rates in paragraph 22, cross-posting one post to all of her social media channels cost Go Daddy \$7,000. Defendant made four video ads with Go Daddy so likely she made at least \$28,000 according to her own posted rates. As mentioned previously, defendant intensely clung to media that declared her the first woman to travel to every country, even if those articles were later corrected, altered or completely taken down. In this Go Daddy ad, she used footage, and framed the still photo, to the original NBC News footage whose banner state "Meet the first woman to travel to every country in the world." NBC News removed this banner after Lintz's article and updated their piece in May 2017. She knew the NBC News piece had been corrected two years before to remove her claim of being the first woman but she intentionally saved and used the removed footage from the original clip with her false claim of being the "First woman to travel to every country in the world" in 2019. She

clearly thought she could get away with pushing this deceptive claim, using retracted footage, in a Go Daddy ad. Go Daddy released the advertisement on their own social media channels as well which were all visible to residents of the District. Making deceptive and misleading advertisements, purposefully using old news footage that was since corrected, for the purpose of selling products is a violation of DC's CPPA.

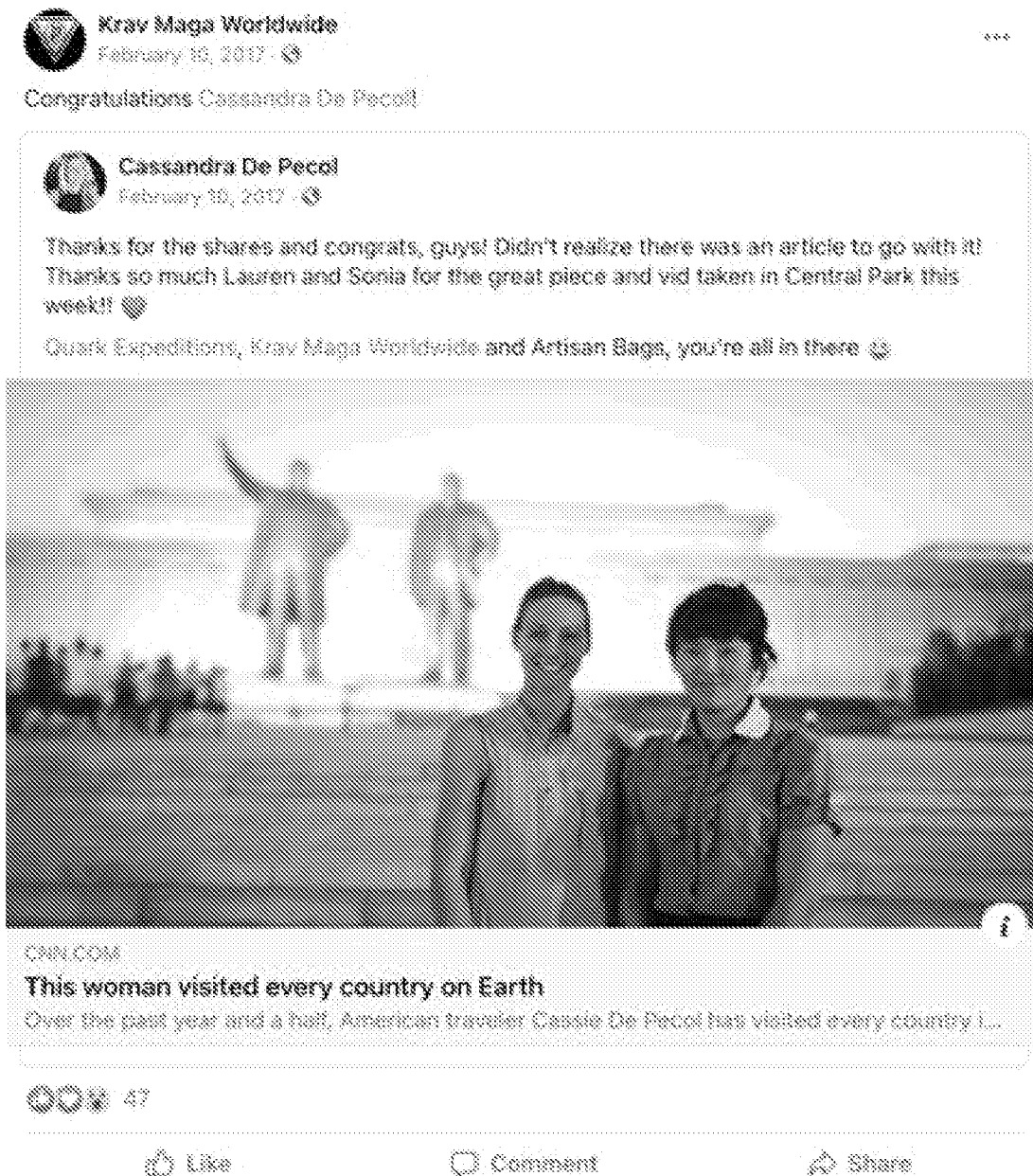


Defendant purposefully framed the old, rather than corrected, NBC story in a Go Daddy ad. The “Meet the first woman to travel to every country in the world” banner was removed by NBC in May 2017, yet defendant used it in this Go Daddy advertisement in May 2019.

77. De Pecol attempted to feature her sponsors in the press as much as possible without any mention of the relationship in the news pieces. Quark Expeditions sponsored defendant's trip to Antarctica. Krav Maga and Artisan Bags also sponsored her. She was able to get all three of them in the CNN piece shown below which claims she is the first woman to visit every country on earth. None of these relationships were made clear and whether she



was being paid by, or received gifts from the sponsors was not mentioned. The inaccurate CNN video is still unfortunately running



Defendant worked to make sure the companies that paid her ended up in her misleading and deceptive press pieces. The CNN piece does not disclose she had relationships with any of these companies.

78. Defendant not only lied to investors and sponsors by telling them she was the first woman to travel to every country on earth when she was not, but she also misled and

deceived press even years on about her accomplishments. De Pecol's consistent false travel claims may be viewed as some as a trivial issue but they negatively impact serious discussions in America today. De Pecol was unfortunately interviewed for a *New York Times* piece titled "Adventurous. Alone. Attacked" that profiled women traveling alone and the challenges they face. Most women in the piece report being sexually assaulted though De Pecol does not. The piece reads "For Cassie DePecol, 29, ... traveling alone means having a long list of precautions. The Connecticut-born activist practices Krav Maga, an Israeli self-defense technique. She carries a GPS tracker"... "Some of these might sound extreme," she said. "But I attribute having safely traveled to 196 countries alone to these specific procedures." Interestingly, they are also the products of two companies that sponsored defendant (see image in paragraph 69). De Pecol was paid by Krav Maga International as well as Spot LLC, which makes GPS trackers. De Pecol is essentially telling readers – use my sponsors and you won't be raped. As defendant stated in her 2018 press kit (see paragraph 22), "setting Cassie apart from the rest is her passion and ability to secure media attention for the brands she works with." Clearly even when the topic is sexual assault, defendant does not stop promoting the brands that are paying her.

79. *The New York Times* never disclosed to readers that these companies paid De Pecol, as it is highly likely De Pecol never disclosed this to *The New York Times*. Interestingly – and importantly – this entire piece's coverage of De Pecol shows that even the American paper of record<sup>103</sup> had a hard time distinguishing what amongst De Pecol's self-aggrandizing claims was true and what was false. The paper updated and corrected its

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<sup>103</sup> Britannica, *The New York Times*, (last visited April 29, 2021 10:15 PM) <https://www.britannica.com/topic/The-New-York-Times>.

story several times from the original. On March 25, 2019 at 8:56pm EST it originally read “For Cassie DePecol, 29, who in 2017 claimed the title of the first woman to visit every country.”<sup>104</sup> Two days later on March 27, 2019 at 1:19pm EST that line was changed to “For Cassie DePecol, 29, who in 2017 claimed the Guinness World Record as the first woman on record to travel to every country.”<sup>105</sup> By 4:12pm EST on April 2, 2019 it was changed yet again to “For Cassie De Pecol, 29, who holds the Guinness World Record for ‘the fastest time to visit all sovereign countries.’” With this update, a correction was issued. Both the correction and the final claim of De Pecol’s are still false. The final description of De Pecol is “For Cassie De Pecol, 29, who holds the Guinness World Record for ‘the fastest time to visit all sovereign nations,’ ...” but by the time this article came out in March 25, 2019, Taylor Demonbreun had that record. The correction, issued on April 2, 2019, states: “An earlier version of this article referred incorrectly to Cassie DePecol’s Guinness World Record. It is for the fastest time to visit all sovereign nations, not merely the first woman on record to travel to all countries.” The merely needs to be stricken from the correction. De Pecol has no record, at all, despite her numerous assertions and insinuations that she does, about being the first woman on record to travel to all countries. Allowing a woman, who is known among the traveling community to make misleading and deceptive statements to be included in such an article creates a dangerous narrative for American women. Women do unfortunately have unique issues while traveling and one is being attacked and assaulted. Those stories

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<sup>104</sup> The Way Back Machine, *The New York Times - Adventurous, Alone, Attacked*. WWW.ARCHIVE.ORG/, (last visited May 1, 2021)  
<https://web.archive.org/web/20190325205645/https://www.nytimes.com/2019/03/25/travel/solo-female-travel.html>.

<sup>105</sup> The Way Back Machine, *The New York Times - Adventurous, Alone, Attacked*. WWW.ARCHIVE.ORG/, (last visited May 1, 2021)  
<https://web.archive.org/web/20190327041042/https://www.nytimes.com/2019/03/25/travel/solo-female-travel.html>.

should be believed. Quoting a woman who is known to lie in telling her travel story is dangerous.

80. If *The New York Times* can be deceived, clearly anyone can. Why have so many reporters and brands fallen for her claim? Because the claim sells. People want to read soft, uplifting stories of female accomplishment. Clearly little to no fact-checking is done for these articles because this is not perceived as hard news. De Pecol knows how to work the press and how to take great photos, which the press use to get eyeballs on their articles. With more eyes on the articles, the press can sell more advertisements. Defendant's Instagram handle is often included in the press stories. In fact, her Instagram photos are often embedded directly in online stories. The people who read those stories then follow De Pecol on Instagram where she then works to influence her followers to buy certain brands and products, though she almost never discloses what brands are paying her to do so.

81. Defendant has a long history of elaborating and making up claims in order to gain attention. In 2013 she was a contestant on the Discovery Channel reality show *Naked and Afraid*. She was left for three weeks on the Panamanian coast with a man, Forrest Galante, and needed to survive. She did not do well. Forrest Galante did however and he went on to have a successful career as a conservationist and television personality. He is now the host of the Animal Planet's *Extinct or Alive* and the Discovery Channel's *Mysterious Creatures with Forrest Galante*.<sup>106</sup> Galante was asked about his experience on *Naked and Afraid* in a Reddit Ask Me Anything (AMA) and stated "I think Cassie really wanted to challenge herself and take a stab at being a TV personality... I recall one

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<sup>106</sup> Discovery (<https://www.discovery.com/dnews/mysteries-of-the-abandoned-returns-to-science-channel/mysterious-creatures-with-forrest-galante-myth-animals-adventure-animal-planet-discovery-plus>)

of our first nights together and Cassie told me all about how ‘famous’ some of the other survivalists had become and how she had researched them all, but when I asked her about the research she had done on survival or Panama, It was nonexistent. To this day I also believe Cassie has a slightly delusional sense of self accomplishment.”<sup>107</sup>

82. Cassie De Pecol wrote a book published by Lioncrest publishing whose title is:

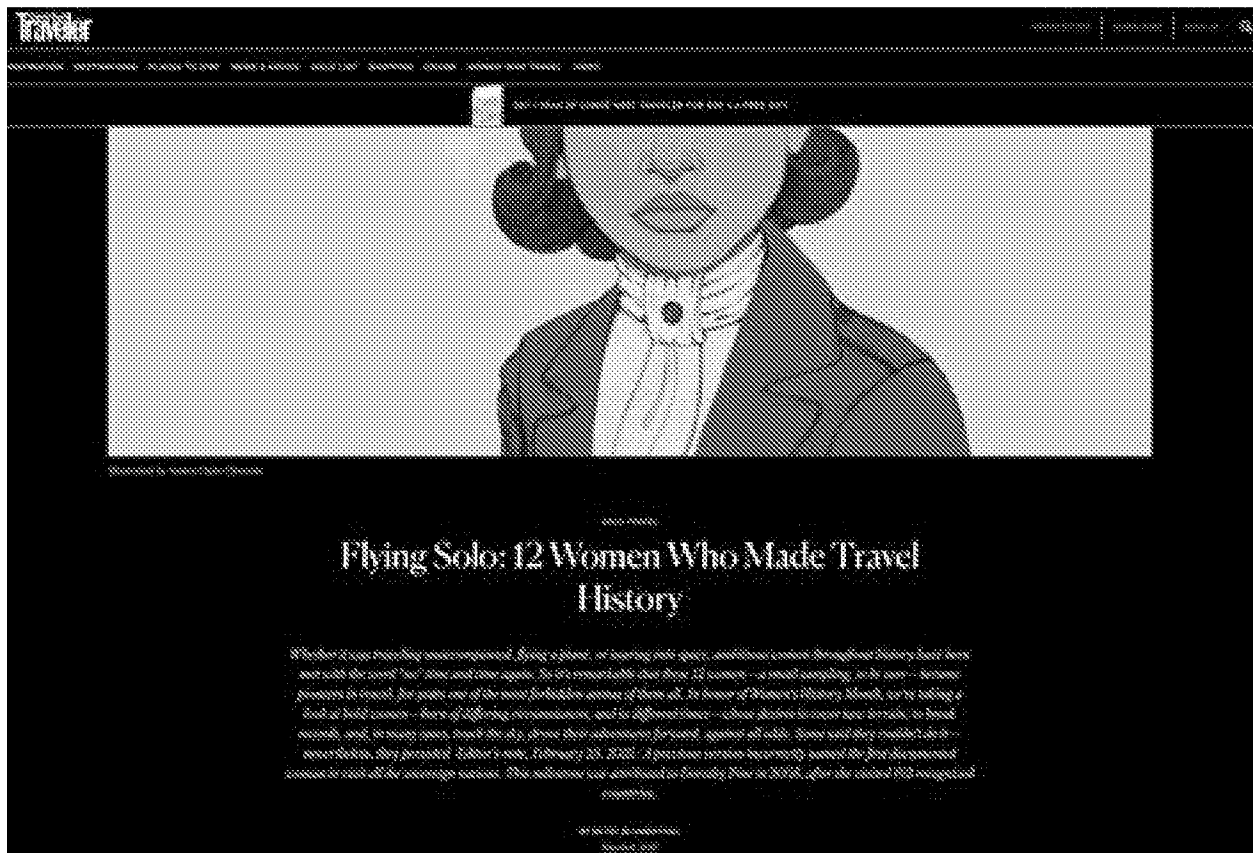
Expedition 196: A Personal Journal from the First Woman on Record to Travel to Every Country in the World. Travelers United reached out to Lioncrest publishing ten times to inquire what fact-checking was done for this book. They never responded. The cover has a quote that says ““They said she couldn’t do it, but..” – Conde Nast Traveler.” This quote was originally from a *Conde Nast Traveler* article called “Flying Solo: 12 Women Who Made Travel History” and the article included De Pecol when originally published in 2017. De Pecol, however, had any mention of her scrubbed from the article on February 23, 2021 when the piece was updated with a note “A previous version incorrectly named the first documented woman to visit all sovereign nations. This milestone was attributed to Dorothy Pine in 2005, after she visited 192 recognized countries.”<sup>108</sup> There is now no mention of De Pecol in the article yet the quote remains on the cover of defendant’s book. This book is for sale online through Amazon and Barnes & Noble online. The book is advertised and sold through those channels to residents of the District. The false claims in this book, including a featured cover quote from a

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<sup>107</sup> ForrestGallante, Comment to Question on *Discovery Channel survivalist Forrest Galante from Naked and Afraid here, ask me anything*. REDDIT (May 2, 2014, 10:24am), [https://www.reddit.com/r/IAmA/comments/23b7tp/discovery\\_channel\\_survivalist\\_forrest\\_galante/](https://www.reddit.com/r/IAmA/comments/23b7tp/discovery_channel_survivalist_forrest_galante/).

<sup>108</sup> Betsy Blumenthal, *Flying Solo: 12 Women Who Made Travel History*, CONDE NAST TRAVEL, (March 8, 2017), <https://www.cntraveler.com/gallery/amelia-earhart-women-who-made-travel-history>.

magazine article that removed any mention of De Pecol, show that this book is deceptive and misleading and in violation of the District Consumer Protection Procedures Act.



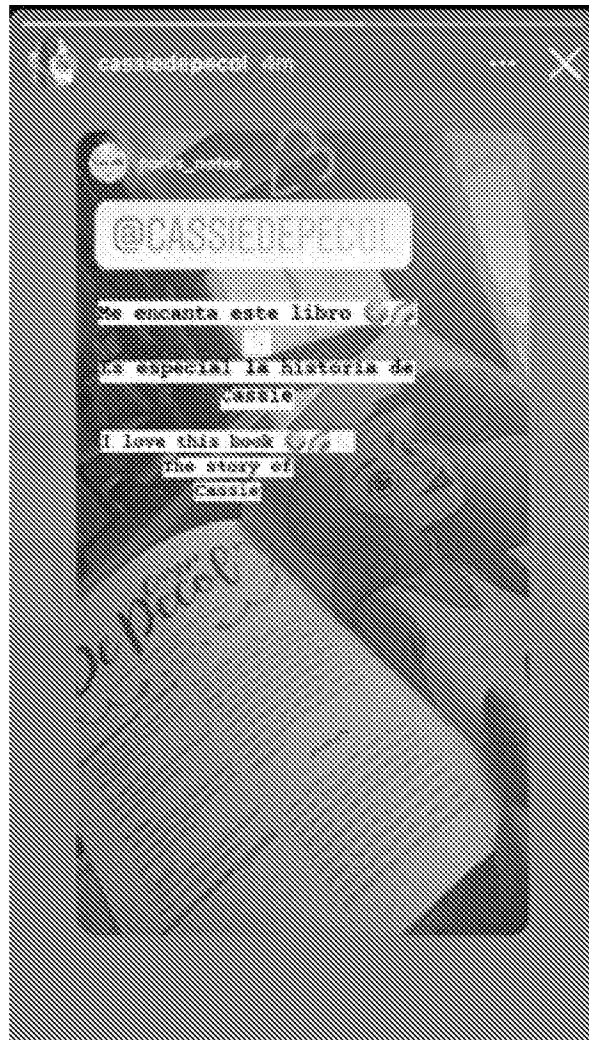
The only quote on the cover of defendant's book is from this *Conde Nast Traveler* article that was updated to remove any mention of De Pecol. Defendant never removed the quote from the cover of her book.

83. Defendant is featured in a Spanish language children's book that she sells signed versions of on her website. The book is called "Las Chicas van donde Quieren 25 Aventureras que Cambriaron el Mundo" which translates to English as "Girls Can Reach as Far as They Want 25 Adventurers Who Changed the World." Spanish is spoken by 8.8% of District residents.<sup>109</sup> The unsigned version this Spanish language children's book is

<sup>109</sup> Hamutal Bernstein, Julia Gelatt, Devlin Hanson and William Monson, *Ten Years of Language Access in Washington, DC, URBAN INSTITUTE*, (April 2014) <https://ohr.dc.gov/sites/default/files/dc/sites/ohr/publication/attachments/Language%20Access%20in%20Washington%20DC%200408%20final.pdf>.

available for sale to District residents through Amazon. A signed version by defendant is available for sale to District residents directly on defendant's website. On page 108 of the book, after giving a bit of history about the Travelers Century Club, it states:

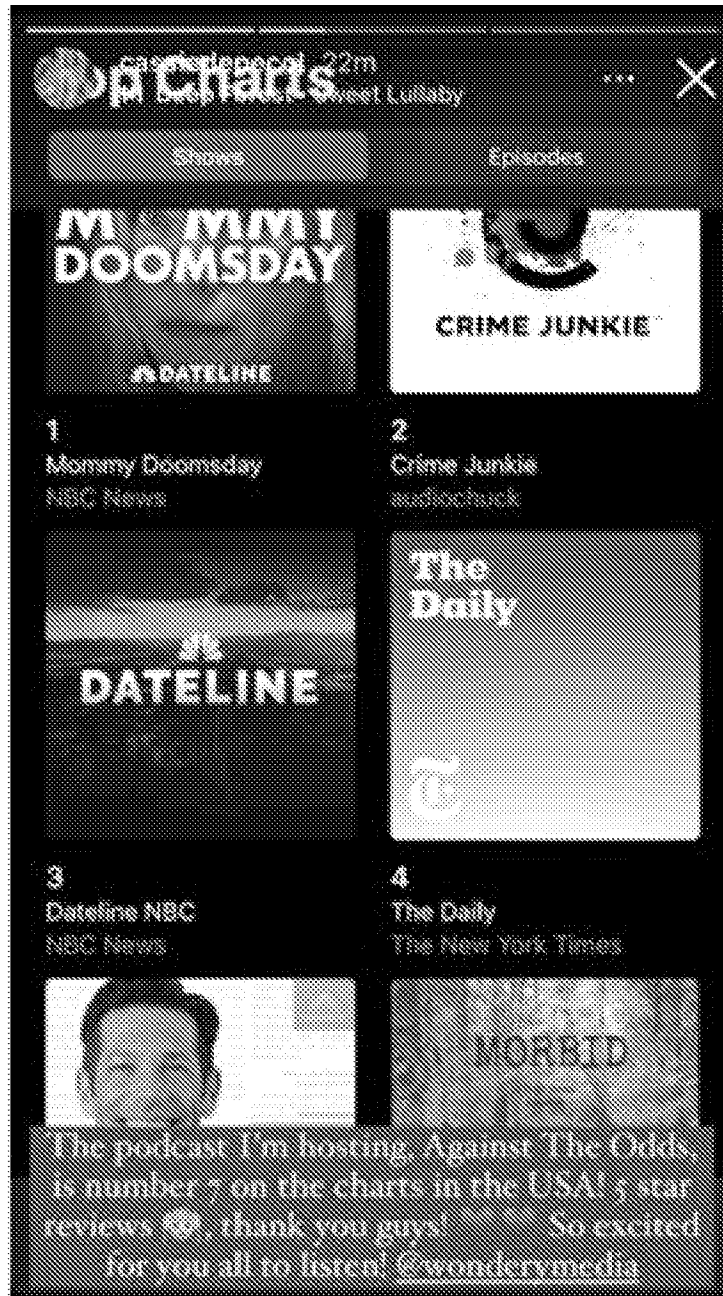
“Cassie De Pecol no solo puede formar parte del Traveler's Century Club, sino que podrida fundar su propio club, porque Cassie ha visitado mas de 100 paises, si los ha visitado todos, y se convirtio en la primera mujer de la historia en conseguirlo.” This translates as “Cassie De Pecol can not only be a part of the Traveler's Century Club, she can found her own club, since Cassie has visited more than 100 countries, she has visited them all!, and she became the first woman in history to do so.” Again, defendant was not the first woman in history to visit every country. De Pecol promoted this book on her Instagram stories on March 25, 2021. Defendant knowingly promoted a book with deceptive information on her Instagram page in order to personally profit in violation of the District's CPPA.



Defendant's Instagram story from March 25, 2021 where she promotes the book *Las Chicas van donde Quieren* 25 *Adventureras que Cambiaron el Mundo*.

84. Defendant is currently the host of a podcast called “Against the Odds” offered by Wondery podcasts. The podcast says it “will share thrilling stories of survival.” The defendant boasted in her Instagram stories on February 28, 2021 (see below). “The podcast I’m hosting *Against the Odds*, is number 7 on the charts in the USA!”

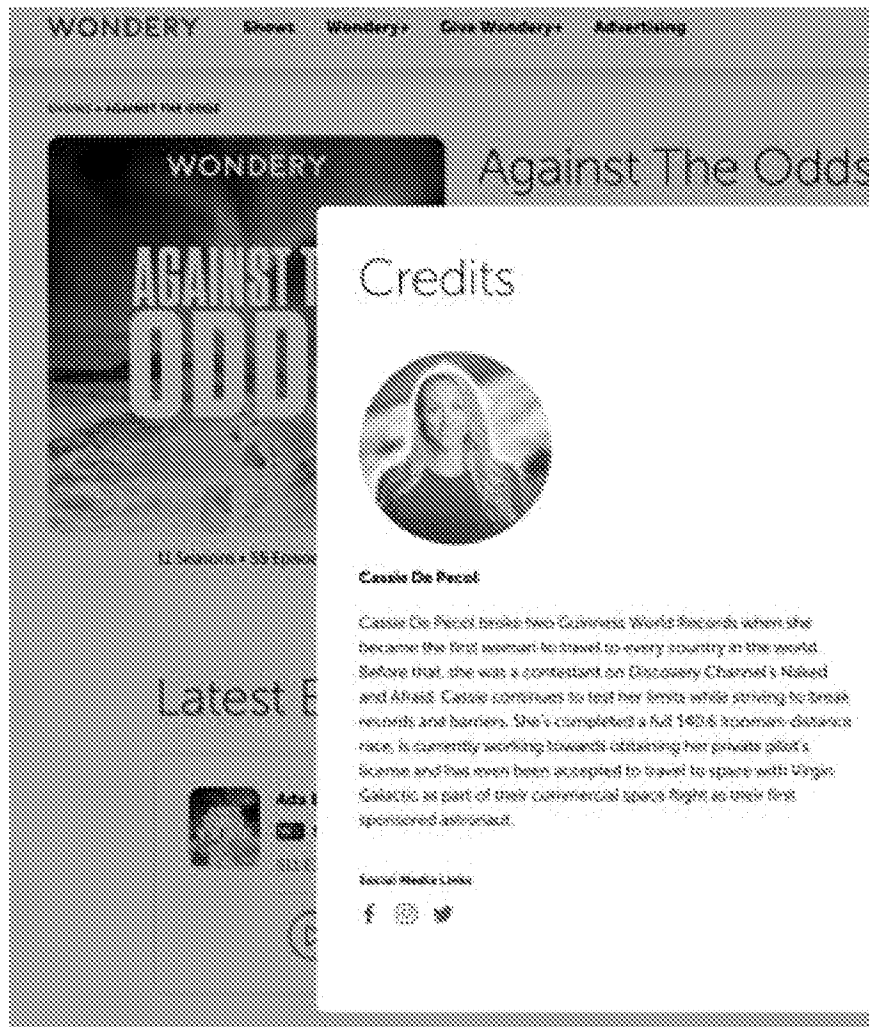




Cassie De Pecol's biography on the Wondery podcast's page states:

"Cassie De Pecol broke two Guinness World Records when she became the first woman to travel to every country in the world. Before that, she was a contestant on Discovery Channel's Naked and Afraid. Cassie continues to test her limits while striving to break records and barriers. She's completed a full 140.6 Ironman-distance race, is currently working towards obtaining her private pilot's license and has even been accepted

to travel to space with Virgin Galactic as part of their commercial space flight as their first sponsored astronaut.”<sup>110</sup>



Above is a screenshot of De Pecol's biography on Wondery. De Pecol is not the first woman to travel to every country in the world. Virgin Galactic did not confirm that De Pecol had any relationship with the company.

Again, defendant never received a Guinness World Record for the first woman to travel to every country. Defendant is not the first woman to travel to every country. De Pecol was cast as a participant on the reality show *Naked and Afraid*. Travelers United did reach out to Ironman, which confirmed that De Pecol actually did complete a full 140.6

<sup>110</sup> *Against the Odds*. WWW.WONDERY.COM, (last visit March 7, 2022) <https://wondery.com/shows/against-the-odds/>.

Ironman-distance race; however Travelers United also reached out to both Virgin Galactic's press and American government relations team who would not confirm or deny that De Pecol had any relationship with the company whatsoever. Wondery advertises on its podcasts. The podcast and the advertisements on the podcast are available for District residents to listen to from the streaming platforms Wondery+ app, Amazon Music and Apple Podcasts, among others. Making false statements, in an attempt to attract more listeners to have more ears to sell more advertisements to, is a violation of the District Consumer Protection Procedures Act.

85. On Season One, Episode Six of the Wondery podcast "Against the Odds," De Pecol reads out an advertisement for Noom, a weight loss program, on the podcast. At the 15:18 minute mark in the podcast, she says "it wasn't until I was 24 that I decided to do my trip around the world, which the expedition around the world was more kind of career focused, and less adventure focused, I was looking to break two Guinness World Records, for the fastest person to travel to every country in the world and also become the first woman on record to travel to every country in the world." Again, she won two Guinness World Records and both were for being the fastest person to travel to every country in the world. She never won a Guinness World Record for being the first woman on record to travel to every country in the world. That is a made-up claim of defendant's that she uses to promote herself on social media, to get more gigs like this Wondery podcast which she then uses to promote herself further with false claims with the goal of getting more social media followers that she can advertise and sell goods to. Wondery's website and all of its podcasts are accessible to residents of the District.

86. Defendant's relentless use of her misleading and deceptive claim of being the first woman to visit every country is at the top of her most prominent social media platforms. She continues to this day to push the news stories that are still unfortunately up and have not been corrected about her being the first woman to visit every country, instead of the news stories that are accurate. Wondery is pushing out the first woman to every country narrative yet again today in 2022, even though the traveling community seems to have clearly pointed out this was not true in 2017. A very quick Google search would show that these claims of De Pecol's are not true however it is to the benefit of Wondery to promote De Pecol's claims as if they are true. She has a large social media following and thus can hypothetically bring in more listeners who Wondery can use to then sell advertisement spots, like to Noom. There has thus far been extremely limited enforcement of Instagram influencer's false claims so there is little incentive for these companies to stop this behavior. Travelers United hopes this complaint encourages an end to this misleading, deceptive and illegal behavior.

87. Wondery shows that it not only is ignoring the truth, but it is promoting this lie. A Deadline article basically repeated Wondery's online biography of De Pecol. The article, titled "Wondery Launches Adventure Survival Podcast" states "De Pecol broke two Guinness World Records when she became the first woman to travel to every country in the world." Again, De Pecol did not win a Guinness World Record for being the first woman to travel to every country in the world. It seems either De Pecol or the Wondery

press team are feeding journalists false information about De Pecol's accomplishments.<sup>111</sup>

88. Below are just a few examples of defendant making the misleading, deceptive and untrue statement that she is the first woman to visit every country since 2020:



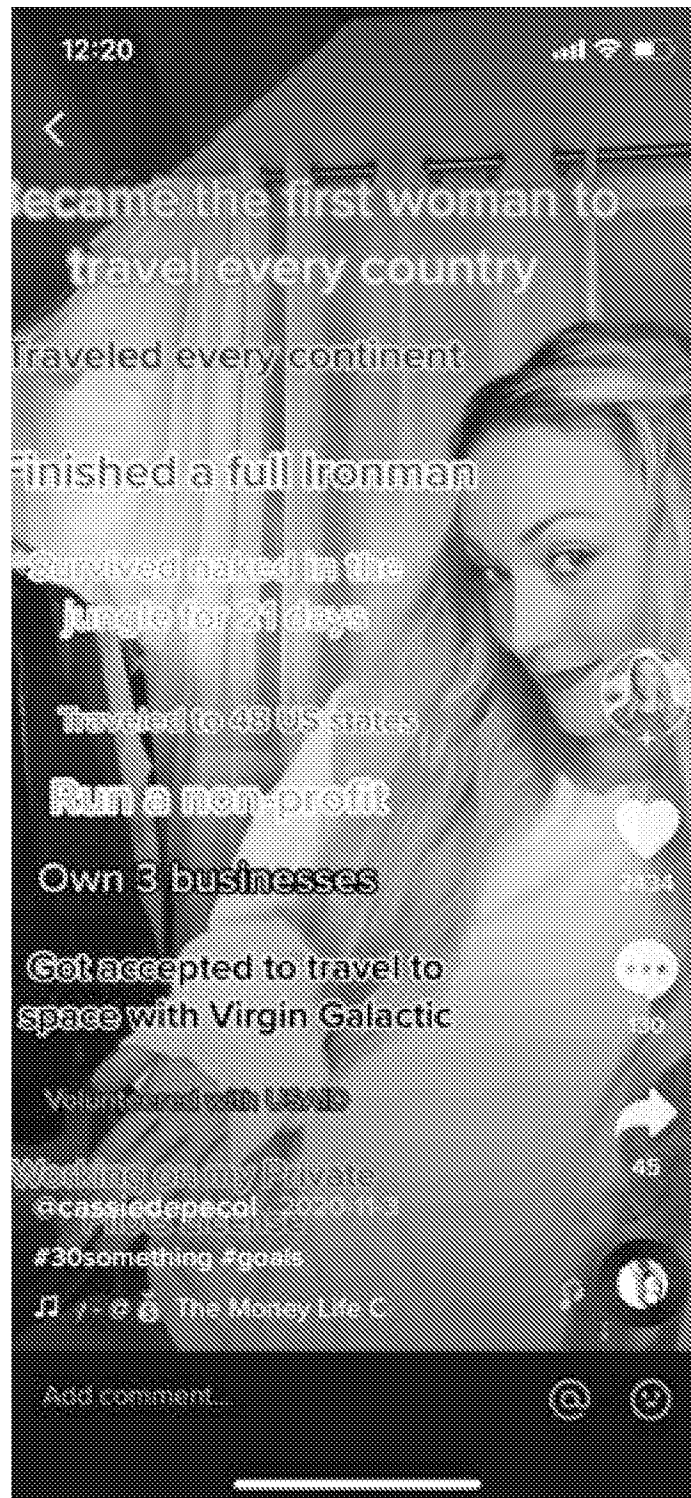
Again, De Pecol did not win a Guinness World Record for becoming the first woman to travel to every country in the world. Still on December 11, 2020 she told that to a reporter for Sheerluxe who put these false claims online.

The entire article has twelve Instagram photos of De Pecol's with the last line of the article being "Follow @CassieDePecol on Instagram"<sup>112</sup>

<sup>111</sup> Peter White, *Emilia Fox True Crime Show; Wondery Survival Story; Rooster Teeth Slate, 'Valentine's Day in Hell' & Erika Alexander Reparations Series – Podcast Roundup*, DEADLINE, (February 11, 2021), <https://deadline.com/2021/02/emilia-fox-wondery-rooster-teeth-valentines-day-in-hell-erika-alexander-1234692423/>

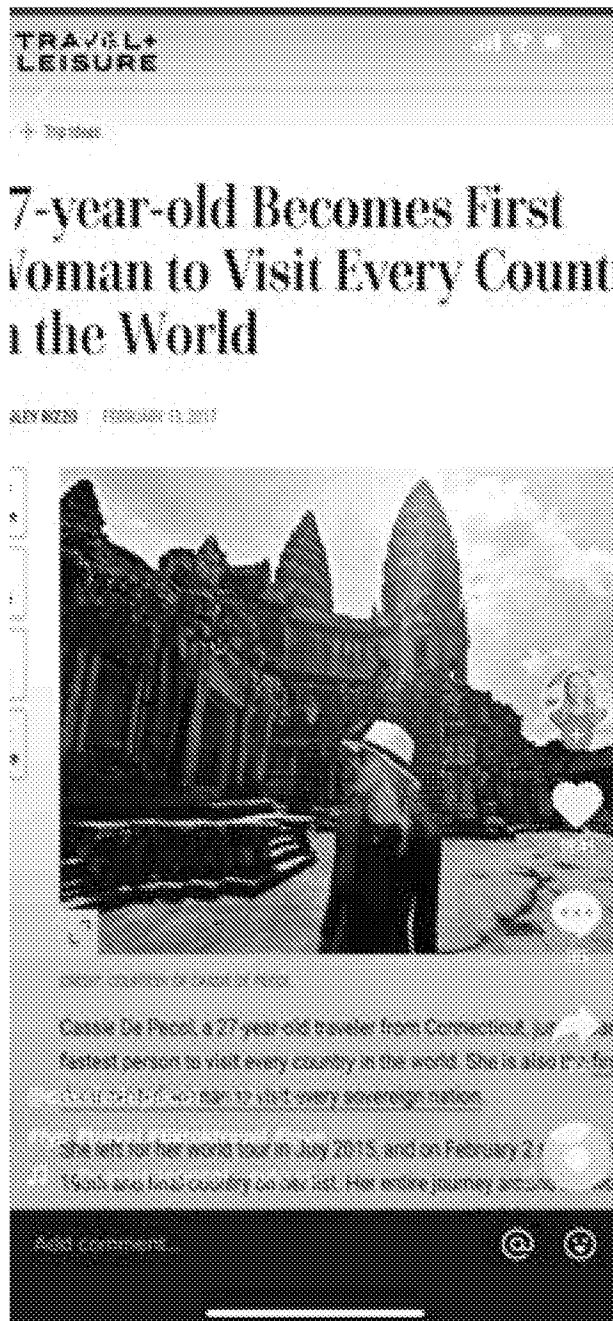
<sup>112</sup> Sherri Andrew, *My Life As an Explorer: Cassie De Pecol*, SHEERLUXE, (December 11, 2020), <https://sheerluxe.com/culture/travel/my-life-explorer-cassie-de-pecol>.





This is from a TikTok video defendant posted on November 3, 2020.<sup>114</sup> The first line she makes the misleading, deceptive and untrue statement that she “became the first woman to travel every country”

<sup>114</sup> Cassiedepecol, TIKTOK, (November 3, 2020), <https://www.tiktok.com/@cassiedepecol/video/6891017693613280517>.



This is from a TikTok video defendant posted on May 7, 2021.<sup>115</sup> The only press piece she shows is a Travel + Leisure article titled “27-year-old Becomes First Woman to Visit Every Country in the World.”

This is one of the only remaining articles on the web claiming that she is the first woman to visit every country without one of her also false modifiers of “on record” or “alone” so she prominently uses this one in her recent videos. De Pecol is not the first woman to visit every country in the world.

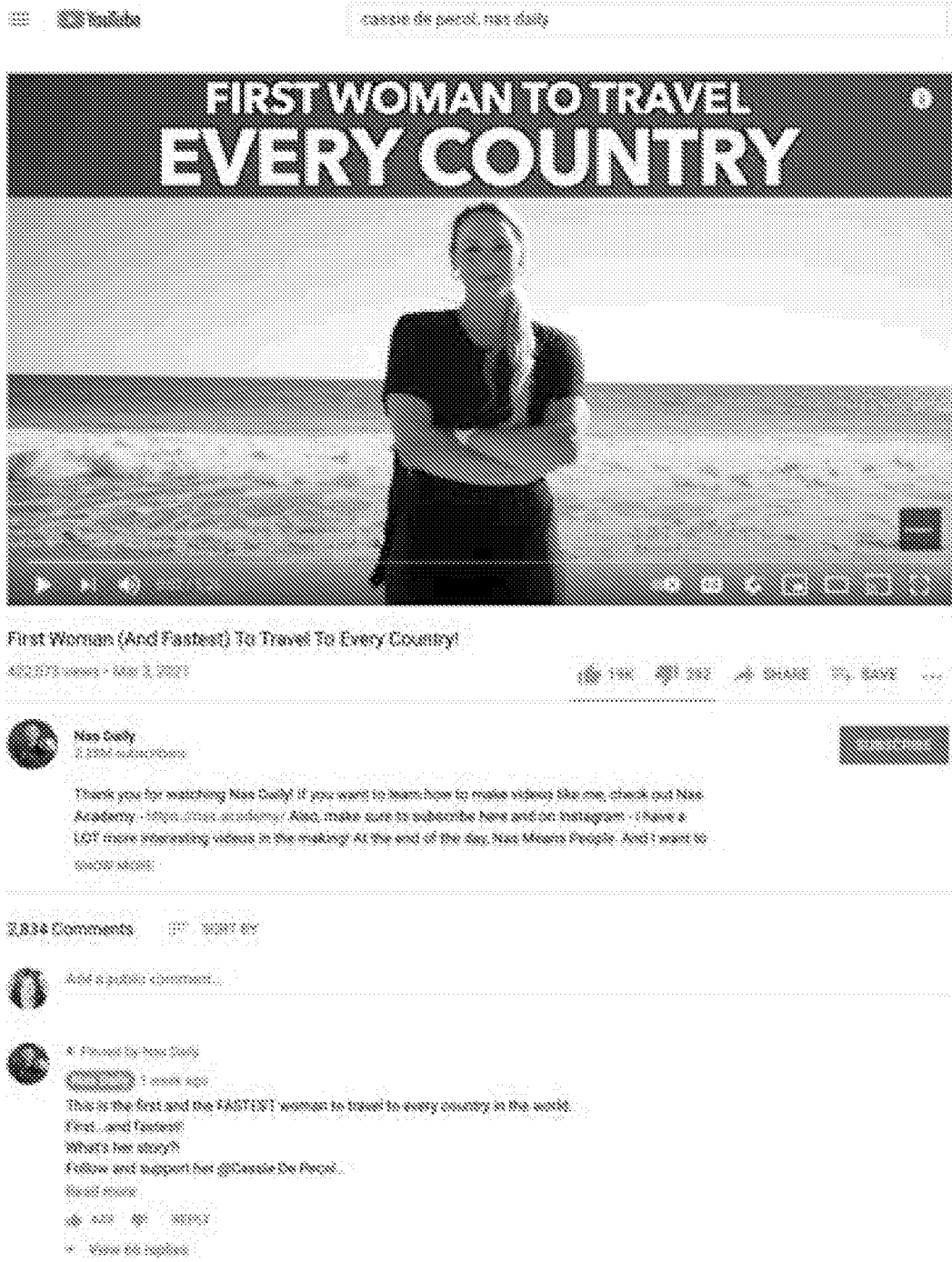
<sup>115</sup> Cassiedepecol, TIKTOK, (May 7, 2021), <https://www.tiktok.com/@cassiedepecol/video/6959711642619874565>





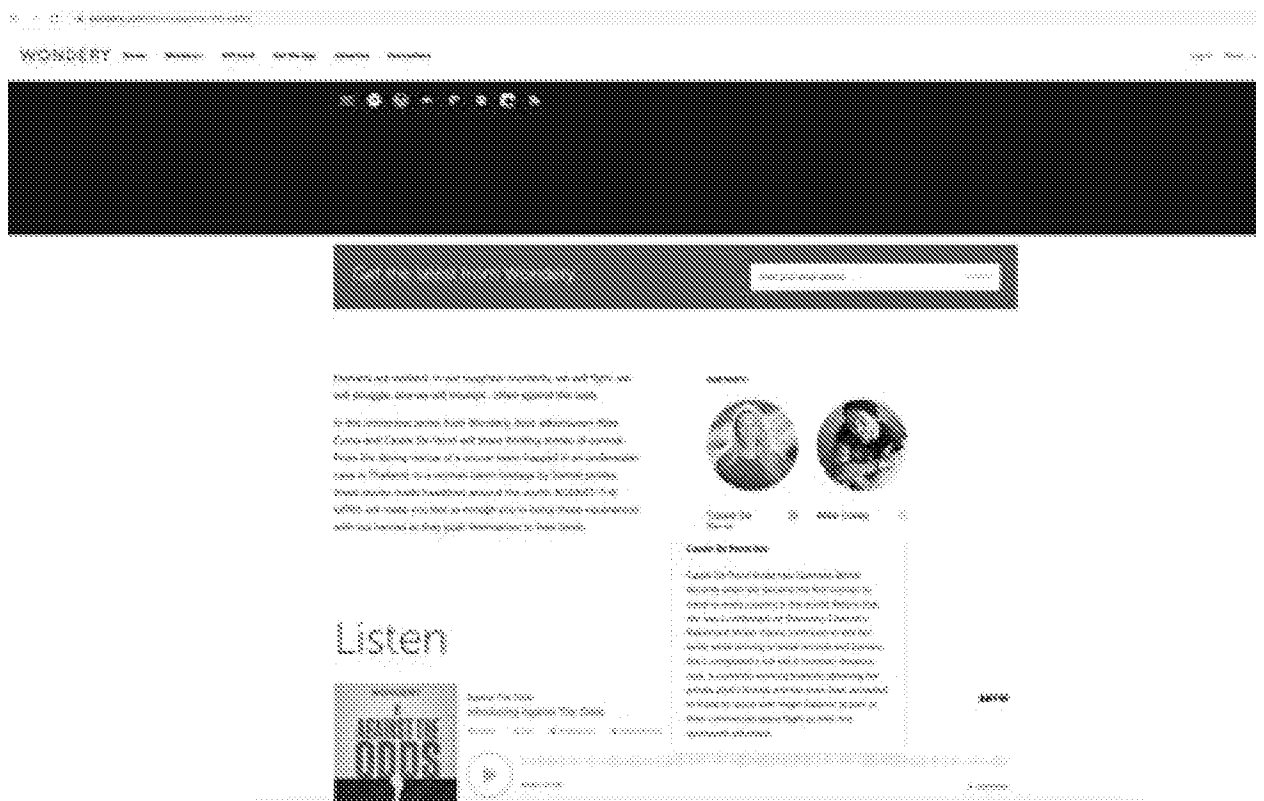
This is from a TikTok video defendant posted on March 31, 2021.<sup>116</sup> Again, the only press piece she shows is a Travel + Leisure article titled “27-year-old Becomes First Woman to Visit Every Country in the World.” This is one of the only remaining articles on the web claiming that she is the first woman to visit every country so she uses this one to promote her false claim. De Pecol is not the first woman to visit every country in the world.

<sup>116</sup> Cassiedepecol, TIKTOK, (March 3, 2021), <https://www.tiktok.com/@cassiedepecol/video/6945903932887682309>.



Nas Daily posted this YouTube video of De Pecol to his popular YouTube channel on March 3, 2021.<sup>117</sup> The video contains numerous false claims by De Pecol. The video is inaccurately titled “First Woman (And Fastest) To Travel to Every Country.”

<sup>117</sup> Nas Daily (Nuseir Yassin), *YouTube*, WWW.YOUTUBE.COM, <https://www.youtube.com/watch?v=vF4QHQCuu1s> (last visited March 6, 2022).



Wondery podcasts started a podcast featuring De Pecol as a host in February 2021. Her Wondery bio<sup>118</sup> falsely states that “Cassie De Pecol broke two Guinness World Records when she became the first woman to travel to every country in the world.” They also say she has been accepted to travel to space with Virgin Galactic. Virgin Galactic would not confirm to Travelers United that they had any relationship with De Pecol.

<sup>118</sup> Wondery, <https://wondery.com/shows/against-the-odds/>, (last visited March 6, 2022).

← Tweet

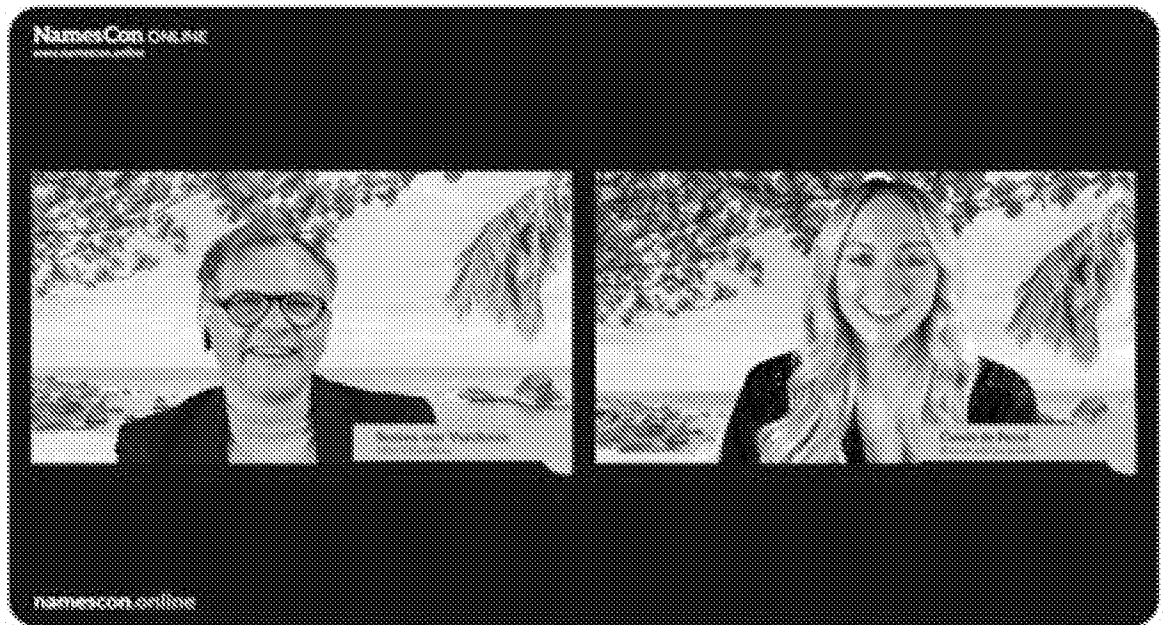
🔄 Cassandra De Pecol Retweeted



**Soeren von Varchmin**  
@svvarchmin

...

@NamesCon Crowd: even if you would have been travelled to all @ICANN meetings ever happened, this is nothing compared to what @cassiedepecol did. She is the first female to travel to all 196 countries! Watch our fireplace chat today at 6h45pm CET (12h45pm EST) at @NamesCon



7:28 AM · Jan 28, 2021 · Twitter Web App

De Pecol was a featured speaker at Names Con, a web domain name conference. Again, using her speaking rates posted in paragraph 13, she likely earned \$18,000 for this speech. They inaccurately tweeted<sup>119</sup> that she is the first female to travel to all 196 countries and she retweeted it. De Pecol has never once corrected anyone on Twitter by saying she is not actually the first woman to travel to every country nor has she ever acknowledged the women who went before her on any social media platform.

<sup>119</sup> Soeren von Varchim, TWITTER (January 28, 2021 7:28 AM), <https://twitter.com/svvarchmin/status/1354768284961415171>.

89. Though defendant has known since 2015 that she would never be the first woman to visit every country, she ignored this fact and simply released press releases, sought funding and generated as much press and as many followers as possible insisting that she was the first woman to travel to every country. Defendant defrauded investors and sponsors, she sought to erase women's history for her own financial benefit, and she has continued to give press misleading statements about her travels or awards, and yet her social media following keeps growing. Defendant seeks to write American women like Audrey Walsworth and Dorothy Pine out of history by ignoring their incredible accomplishments of independent travel that happened decades ago. Defendant cannot show her face at travel conferences because she knows the attendants are aware that her claims are not true, so defendant found an incredible niche of getting multi-thousand dollar speaking gigs at conferences in the tech industry that are overwhelmingly male. Men in these spaces have long underestimated women<sup>120</sup> so it's not surprising to Travelers United to see that these men think so little of women that they honestly think 2017 was the first time a woman went to every country. Travelers United believes defendant has had a toxic impact in the travel space, that she has engaged in behavior that is clearly in violation of the DC's CPPA and that she should be judged to the full extent of the law.

### **CASSANDRA DE PECOL'S DECEPTIVE ADVERTISING PRACTICES**

#### **Defendant's Practice of Misleading and Deceptive Disclosures**

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<sup>120</sup> Emily Chang, BROTOPIA (2018).

90. Defendant, as described in paragraphs 10 through 89 above, has a long history of making misleading, deceptive and untrue statements relating to her being the first woman to travel to every country in the world. She also, unfortunately, has a history of not disclosing when she is being paid to advertise on behalf of brand. Defendant often posts on behalf of brands on her social media channels and she almost never has disclosures that follow the FTC influencer guidance of 2017<sup>121</sup> or 2019.<sup>122</sup> Additionally, she is potentially just making up sponsorships she does not actually have to make herself seem more adventurous, interesting and appealing to brands. In addition to the lack of disclosures and potentially making up sponsorships, defendant does not disclose that she has a paid relationship with businesses when she leaves five-star reviews for them on websites such as TripAdvisor. Furthermore, defendant has created at least one account, with another name, to leave reviews and responses for reviews on Amazon to defend her book. The creation of fake reviews for self-promotion and financial enrichment is a violation of Section Five of the FTC Act and of the District's CPPA.

91. Defendant rarely discloses she has a relationship with a brand. The FTC clearly states "If you endorse a product through social media, your endorsement message should make it obvious when you have a relationship ("material connection") with the brand."<sup>123</sup> Of

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<sup>121</sup> Lesley Fair, *Three FTC Actions of Interest to Influencers*, FEDERAL TRADE COMMISSION, (September 7, 2017) <https://www.ftc.gov/news-events/blogs/business-blog/2017/09/three-ftc-actions-interest-influencers>.

<sup>122</sup> *FTC Releases Advertising Disclosures Guidance for Online Influencers*, FEDERAL TRADE COMMISSION, (November 15, 2019) <https://www.ftc.gov/news-events/press-releases/2019/11/ftc-releases-advertising-disclosures-guidance-online-influencers>.

<sup>123</sup> *Disclosures 101 For Social Media Influencers*, FEDERAL TRADE COMMISSION, (November 15, 2019) <https://www.ftc.gov/tips-advice/business-center/guidance/disclosures-101-social-media-influencers>.

92. De Pecol's unclear relationship with a brand is uniquely confusing to her followers who do not know if she is truthfully sharing a real experience of hers or if she is being paid to promote content from certain brands. Or, even odder, if she is just totally making stuff up to make her adventures seem more appealing to gain more followers and to be a more successful, and profitable, influencer. On April 5, 2018 she posted the following Instagram post about Virgin Galactic's successful test flight.



Galactic as part of their commercial space flight, as their first sponsored astronaut.”<sup>124</sup>

She produced an advertisement for GoDaddy that was posted on YouTube on May 28, 2019 that is titled “I’M GOING TO SPACE” and in that video she states “I applied to travel to space on a commercial spaceflight and in 2017 was accepted.”<sup>125</sup> On her Amazon biography page, she states she “has been invited to travel into space with Virgin Galactic.”<sup>126</sup> This claim she further repeated on her Wondery podcast biography where she states that she has been “accepted to travel to space with Virgin Galactic as part of their commercial spaceflight as their first sponsored astronaut.”<sup>127</sup> Travelers United reached out to Virgin Galactic’s press team and American government relations. Neither would confirm that De Pecol had any relationship or sponsorship with the company. There have been no press releases or acknowledgement of an influencer commercial space flight from Virgin Galactic. The lack of knowing if this claim is true, at all, is exceptionally concerning. If she has no relationship with the company, this is deceptive advertising and self-promotion to acquire followers to influence and promote products based on a claim that is completely made up. Journalist Taylor Lorenz wrote in *The Atlantic* an article titled “Rising Instagram Stars Are Posting Fake Sponsored Content.”<sup>128</sup> The article details how Instagram influencers are promoting content that looks sponsored where in reality the influencers have no relationship with the brand. Lorenz writes in the

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<sup>124</sup> Cassie De Pecol, *About*, WWW.CASSIEDEPECOL.COM, <https://cassiedepecol.com/about/> (last visited May 1, 2021).

<sup>125</sup> Cassie De Pecol, I’M GOING TO SPACE, YouTube (May 28, 2019) <https://www.youtube.com/watch?v=9t7kiBPDSOM&t=5s>.

<sup>126</sup> Cassie De Pecol, WWW.AMAZON.COM, [https://www.amazon.com/Cassie-De-Pecol/e/B07DSCQRMX/ref=ntt\\_dp\\_epwbk\\_0](https://www.amazon.com/Cassie-De-Pecol/e/B07DSCQRMX/ref=ntt_dp_epwbk_0) (last visited May 1, 2021).

<sup>127</sup> *Against the Odds*, WWW.WONDERY.COM, (last visit May 1, 2021) *Against the Odds*, WWW.WONDERY.COM, (last visit May 1, 2021) *Against the Odds*, WWW.WONDERY.COM, (last visit May 1, 2021), <http://wondery.com/shows/against-the-odds/>.

<sup>128</sup> Taylor Lorenz, *Rising Instagram Stars Are Posting Fake Sponsored Content*, THE ATLANTIC, (December 18, 2018), <https://www.theatlantic.com/technology/archive/2018/12/influencers-are-faking-brand-deals/578401/>.



article “many have adopted a new strategy: Fake it until you make it.” The article points out that making up sponsorships does not explicitly violate any current FTC influencer guidance. That is true. Making up sponsored partnerships in order to seem more adventurous so that one gets more followers and thus more brand deals does, however, violate the District’s CPPA. Pretending one has sponsors when one does not, is a violation of CPPA’s §28-3904 unfair or deceptive practices subsection b. The subsection states: “(b) represents that the person has a sponsorship, approval, status, affiliation, certification, or connection that the person does not have.”

93. Defendant’s history of leaving positive reviews for hotels that are paying her is problematic. Possibly every five-star review defendant has left on her TripAdvisor platform seems to be from a hotel who either gave her a free stay or paid her to stay with them. Because defendant rarely discloses the relationship between the business she is promoting on her social media channels, it is unclear if she is simply getting free stays at these nice hotels or if these hotels are paying her to promote them. These reviews are a violation of Section 5 of the FTC Act (15 USC §45). The Federal Trade Commission in 2009 updated the FTC Guide Concerning the Use of Endorsements and Testimonials in Advertising to emphasize that ““material connections” (sometimes payments or free products) between advertisers and endorsers – connections that consumers would not expect – must be disclosed.”<sup>129</sup> The guide also “clearly states that both advertisers and

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<sup>129</sup> *FTC Publishes Final Guides Governing Endorsements, Testimonials*, FEDERAL TRADE COMMISSION, (October 5, 2009) <https://www.ftc.gov/news-events/press-releases/2009/10/ftc-publishes-final-guides-governing-endorsements-testimonials>.

endorsers may be liable for false or unsubstantiated claims made in an endorsement -- or for failure to disclose material connections between the advertiser and the endorser.”<sup>130</sup>

94. Defendant left a five star review on TripAdvisor for La Serena Villas in Palm Springs, California in September 2020.



On her Instagram account she posted three static posts tagged to the location of La Serena Villas using the same photos that she posted on TripAdvisor.

<sup>130</sup> *FTC Publishes Final Guides Governing Endorsements, Testimonials*, FEDERAL TRADE COMMISSION, (October 5, 2009) <https://www.ftc.gov/news-events/press-releases/2009/10/ftc-publishes-final-guides-governing-endorsements-testimonials>



She tagged La Serena Villas in Instagram on each post and mentioned the hotel with its handle in the comments. These three Instagram posts were cross posted on Twitter.

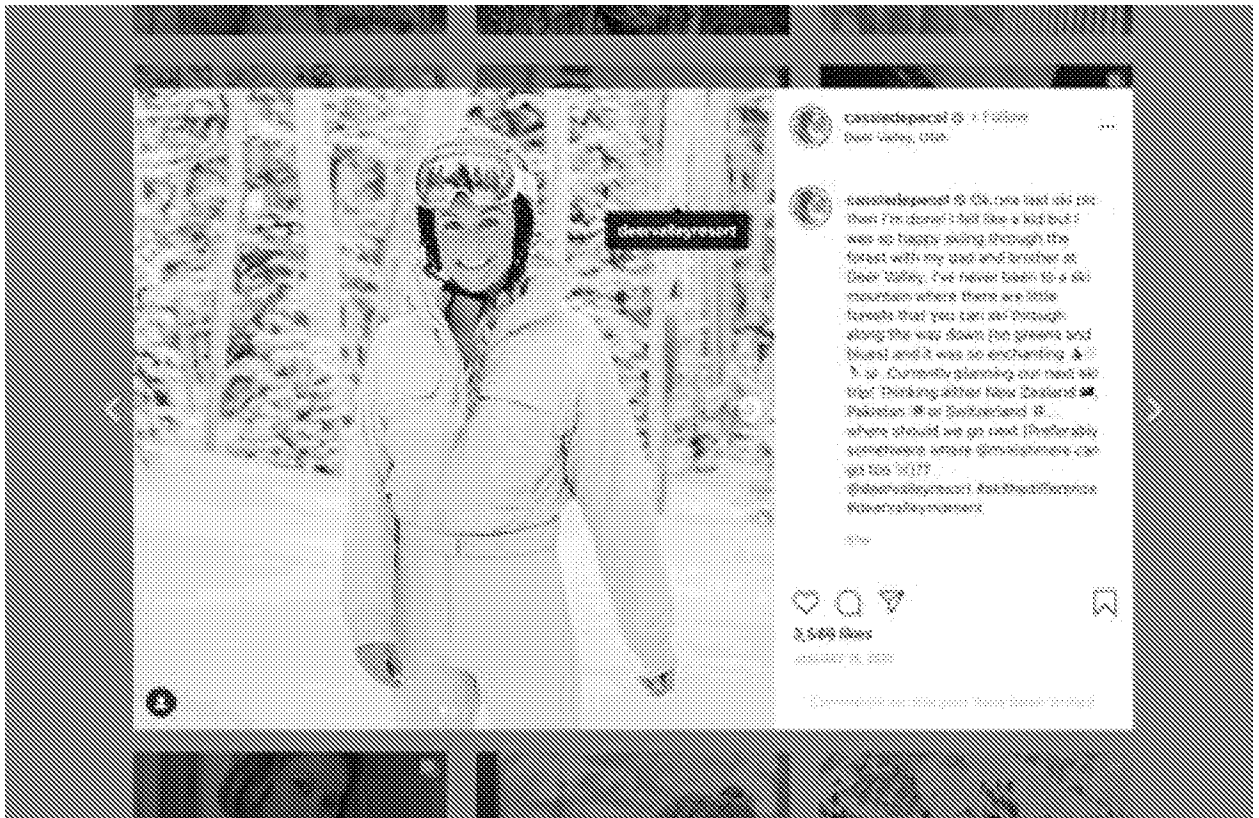


She never mentions any paid relationship yet there highly likely was one. She then left a two-star review for another hotel in Palm Springs, the Avalon Hotel and Bungalow. Though Travelers United does not know who is paying defendant and when, defendant herself makes it pretty clear that she leaves five-star reviews for hotels that pay her. This hotel didn't pay, and it never ended up on her Instagram, so this hotel gets a two-star

review. Then in January 2020, defendant leaves a five-star review for Deer Valley Ski Resort. Interestingly, this is the only review on TripAdvisor where she notes a relationship with the resort so she clearly knew she should have been making disclosures as she did in this one instance.

[illegible]

This is the one TripAdvisor review where she states at the beginning “In the honor of transparency and ethics, it’s worth nothing that I partnered with Deer Valley this year on my visit.” She never mentions this in any other TripAdvisor review. This shows she clearly knows she should disclose a paid relationship but for some reason the only time she does is here.



Defendant had four Instagram posts, many with multiple photos, where she talks about her trip to Deer Valley. Not one of them mentions a paid relationship, partnership or sponsorship between defendant and Deer Valley.

Then in August 2018 she left a five-star TripAdvisor review for the St Julien Hotel and Spa in Boulder, Colorado. The TripAdvisor review mentions no paid relationship between defendant and the hotel. Defendant at the time posted three separate Instagram posts tagged at the location of the St Julien Hotel & Spa. These three Instagram posts do say at the top “Paid partnership with stjulienhotel.” It is great that she disclosed this, but without mention that this is an ad prominently at the beginning of the text, it still violates the FTC guidelines for influencers. Of the three Instagram posts, in only one of them at the very end after a significant amount of text, does the defendant state “Thanks to the @stjulienhotel for gifting me with this reflective mountain view and wonderful stay.” However, this is confusing -- was

the stay gifted (meaning she was given a free stay) or was she paid to stay and promote the hotel which the “Paid Partnership with stjulienhotel” at the top of the post suggests.



Then in August 2018 she left a five-star review for Sonnenalp in Vail, Colorado.

Defendant posted two Instagram photos from the Sonnenalp Hotel Vail. One post of defendant's at the Sonnenalp Hotel Vail received 8,456 likes on Instagram.<sup>131</sup> No paid relationship is disclosed anywhere in the posts. Then in July 2018 she left a five-star TripAdvisor review for Vail Marriott Mountain Resort in Vail, Colorado. She posted two Instagram photos from the Vail Marriott Mountain resort. No paid relationship is disclosed anywhere in the posts. In August 2018 she left a five-star TripAdvisor review

<sup>131</sup> Cassiedepecol, WWW.INSTAGRAM.COM, <https://www.instagram.com/p/BI--C7kA7IH/> (last visited May 1, 2021).

for the Viceroy Snowmass. She posted three Instagram posts from the Viceroy Snowmass. No paid relationship is discussed anywhere in the posts. In July 2018 she left a five-star review for The Little Nell. She posted once on Instagram with her location tagged to The Little Nell and mentioning The Little Nell in the post.<sup>132</sup> No paid relationship is disclosed in the post. In June 2018 she left a five-star TripAdvisor review for Vintners Resort. She was at Vintners Resort as part of a Visit Santa Rosa promotion.<sup>133</sup> No paid relationship is disclosed in the post. In June 2018 she left a five-star review for Sanara Tulum in Tulum, Mexico. She posted on Instagram four times from the Sanara Hotel in Tulum.<sup>134</sup> She also shows her stay at this hotel in a TikTok video posted by defendant on September 12, 2020.<sup>135</sup> No paid relationship is discussed on Instagram or TikTok. In September 2016 she left a five-star TripAdvisor review for the Soneva Fushi in the Maldives. Defendant posted on Instagram three times tagging her location at the Soneva Fushi Maldives.<sup>136</sup> No paid relationship is mentioned in any of the posts. Defendant later posted a TikTok video on February 13, 2021 calling the Soneva Fushi the “Best Hotel in the World.” There is no mention of a paid relationship in the TikTok video. All of these reviews are up as of the filing of this complaint.

95. Amazon reviews, just like TripAdvisor reviews, also need very clear disclosure if there is a financial benefit by the person leaving the review. Defendant released a book,

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<sup>132</sup> Cassiedepecol, WWW.INSTAGRAM.COM, <https://www.instagram.com/p/BltbppHglGx/> (last visited May 1, 2021).

<sup>133</sup> Cassiedepecol, WWW.INSTAGRAM.COM, <https://www.instagram.com/p/Bkjjb7AAAXu/> (last visited May 1, 2021).

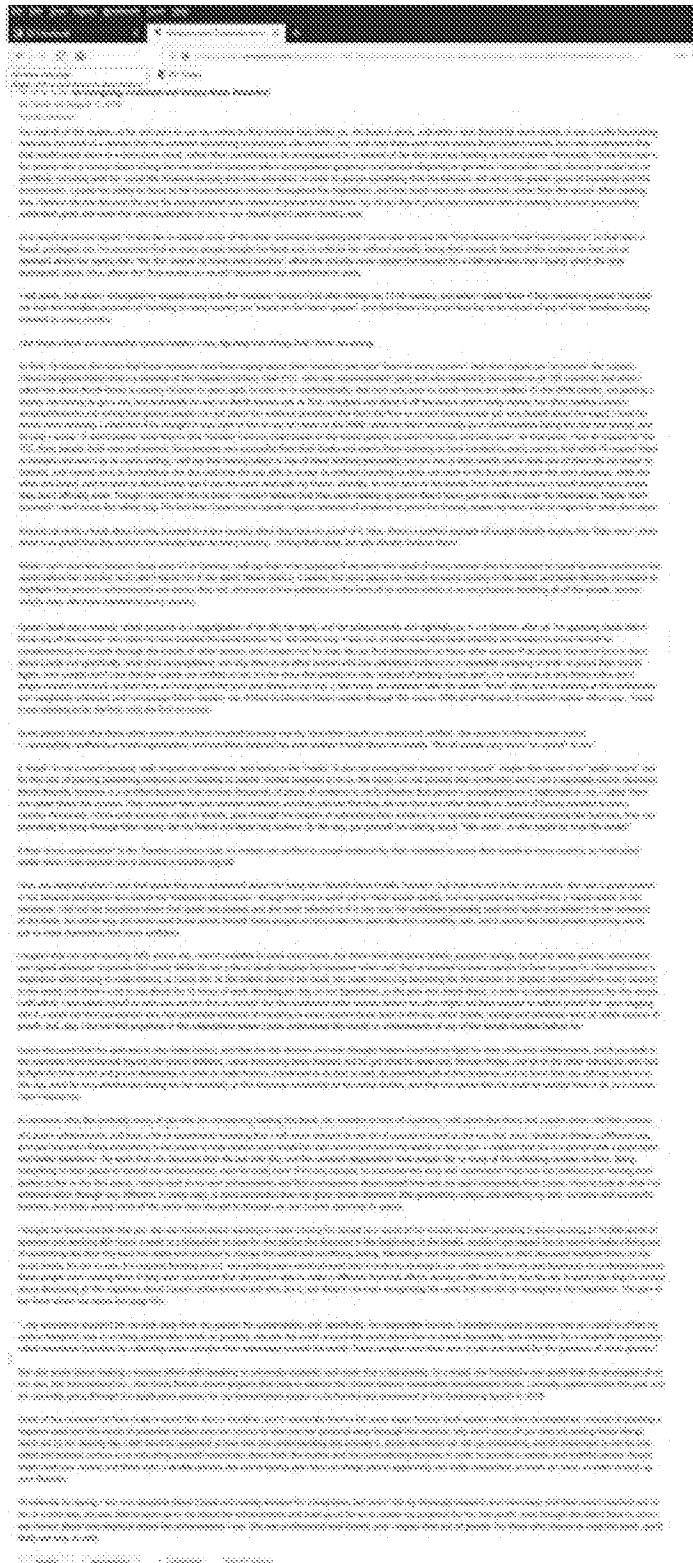
<sup>134</sup> Cassiedepecol, WWW.INSTAGRAM.COM, <https://www.instagram.com/p/BkGiulCgA2F/> (last visited May 1, 2021).

<sup>135</sup> Cassiedepecol, WWW.TIKTOK.COM, <https://vm.tiktok.com/ZMeANBggF/> (last visited May 1, 2021).

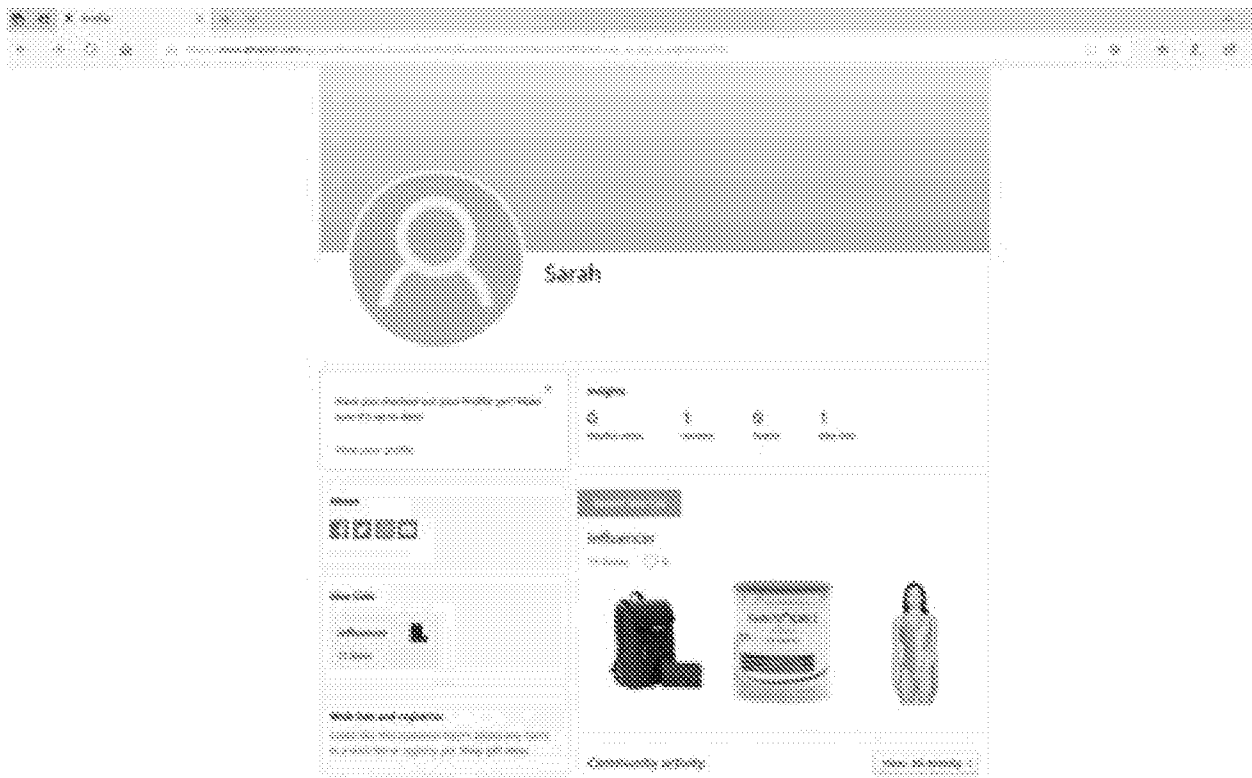
<sup>136</sup> Cassiedepecol, WWW.INSTAGRAM.COM, <https://www.instagram.com/p/BINQ-zsjiq4/> (last visited May 1, 2021).

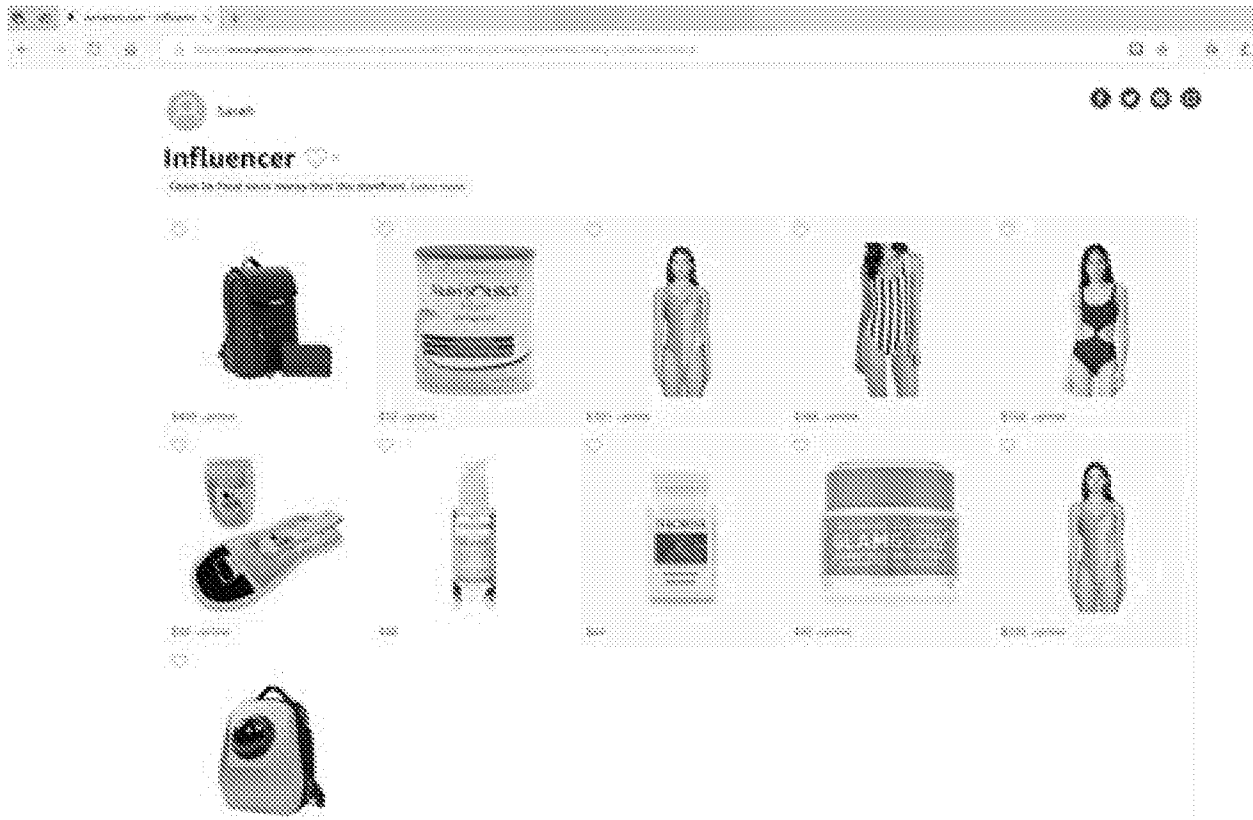


published by Lioncrest publishing on Amazon and Barnes & Noble online. The book entitled “Expedition 196: A Personal Journal from the First Woman on Record to Travel to Every Country in the World” is only available for sale online, so the online reviews are very important for the sale of the book. Not surprisingly, multiple people in the well-traveled community left her one-star reviews stressing yet again, that defendant is not the first woman to visit every country. One one-star review went into detail naming all of the women who went before defendant and citing the previous articles from Janice Lintz and Stefan Krasowski that detailed how defendant had a history of making false claims. The day after that one-star review was left a twenty paragraph five-star review was left by someone named Sarah, who Travelers United asserts is clearly defendant. The Amazon review is below:



Defendant seems to have been creating multiple Amazon accounts to leave five-star reviews for her book. This particular 20 paragraph review insults the TCC, belittles Nina Sedano, talks about a quote from TravelPulse (that's the publication that defendant forced to issue the long editor's note after one columnist said she hadn't been everywhere shown in paragraph 60), compares Cassie De Pecol to Serena Williams, notes feeling envious of Cassie De Pecol's achievements and praises how much money De Pecol was able to raise for her trip. Though this account was from someone who registered for Amazon under the name of Sarah, the Amazon account was registered as an Influencer with Amazon affiliate links where it states "Cassie De Pecol earns money from this storefront." Then it has the links to products that De Pecol has promoted on her Instagram account.

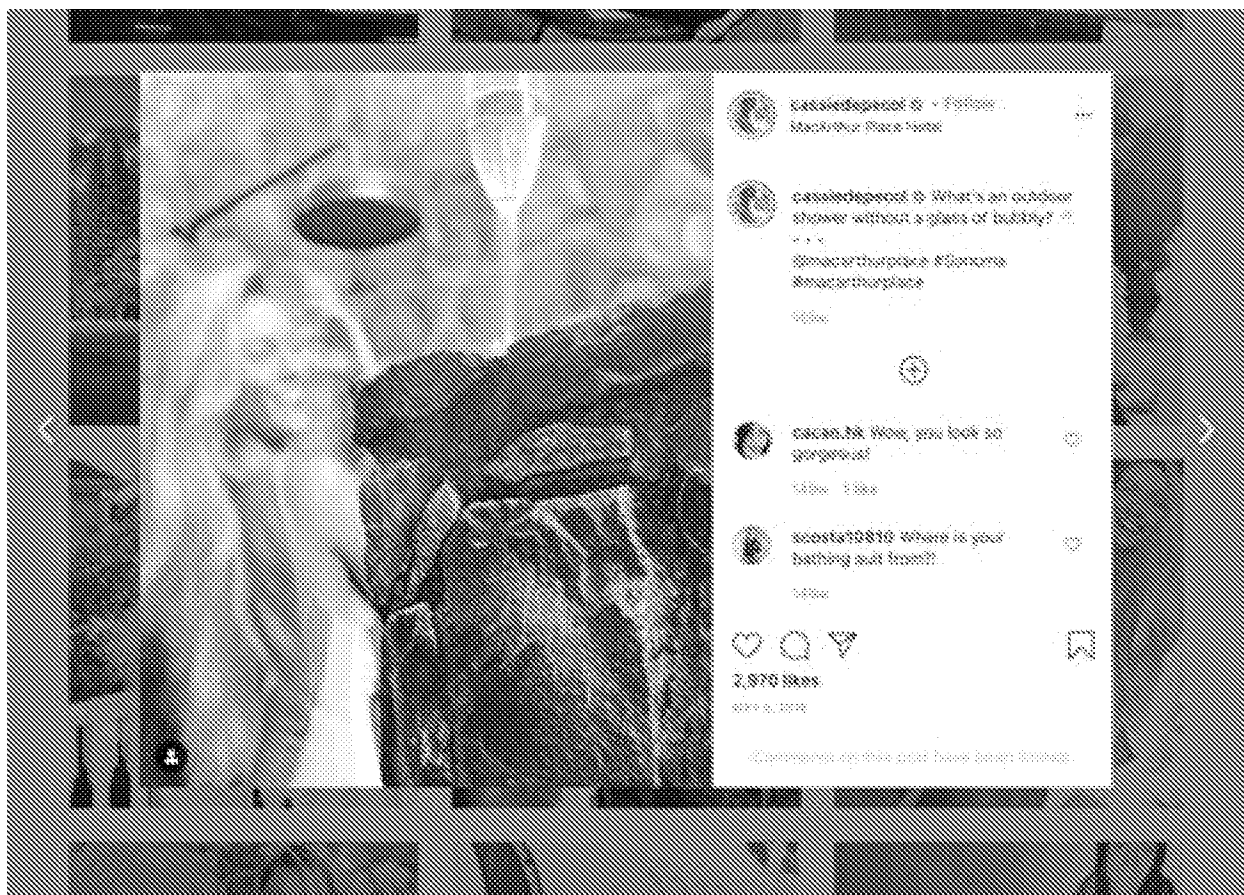




These are products that De Pecol herself is trying to sell to the followers of her Instagram account. Through affiliate links, here linked through an account she set up as Sarah, the money clearly comes back to defendant as the Amazon page itself notes. The multi-colored bathing suit pictured here she wears on Instagram, with a post on both May 5, 2018<sup>137</sup> and July 1, 2018.<sup>138</sup> Nowhere in either post does she disclose a financial connection between herself and selling the bathing suit to her followers. The May 5, 2018 post is below:

<sup>137</sup> Cassie De Pecol, INSTAGRAM (May 5, 2018), <https://www.instagram.com/p/BiaAPJOnUCd/>

<sup>138</sup> Cassie De Pecol, INSTAGRAM (July 1, 2018), <https://www.instagram.com/p/BksUPkZAHhv/>



There are other Amazon accounts created at the time that seem suspiciously similar to the writing of Sarah, who is likely defendant, that are also leaving five-star reviews on defendant's book. Leaving reviews for one's own book violates both Amazon terms and conditions, DC's CPPA and FTC Section Five. Amazon did remove many of these reviews, including the one left by "Sarah," by the time of this filing

**CAUSE OF ACTION**  
**(Violations of the District of Columbia Consumer Protection Procedures Act)**

96. The allegations of paragraphs 1 through 95 are re-alleged as if fully set forth here.
97. The CPPA is a remedial statute that is to be broadly construed. It establishes an enforceable right to truthful information from merchants about consumer goods and services that are or would be purchased, leased, or received in the District of Columbia §28-3901(c).
98. Travelers United has standing to bring this Count under §28-3905(k)(1)(D)(i) “Subject to sub-paragraph (ii) of this subparagraph, a public interest organization may, on behalf of the interests of a consumer or a class of consumers, bring an action seeking relief from the use by any person of a trade practice in violation of a law of the District if the consumer or class could bring an action under subparagraph (A) of this paragraph for relief from such use by such person of such practice.” Travelers United is a public interest organization, with members in the District, that has done significant advocacy work against deceptive advertising across the travel industry, both locally in DC and on the federal level. Deceptive and misleading advertising is a trade practice in violation of a law of the District.
99. Cassandra De Pecol’s claims of being the first woman to travel to every country is a misrepresented characteristic under §28-3904(a), as she was not the first woman to travel to every country, but is claiming she is to gain more followers on social media in order to get more money from brands in her work as an influencer. The “first woman to visit every country” claim exists for defendant to get more press and thus more social media followers, not to provide any truth about her actual accomplishments. With more

followers, she has more people to sell goods to including goods to residents of the District of Columbia. With more followers, she has more people to sell goods to including goods to residents of the District of Columbia. Additionally, if De Pecol is making up sponsorships, as she is perhaps doing with Virgin Galactic, that is a violation of §28-3904(b) as that is a misrepresented sponsorship.

100. Cassandra De Pecol's claims of being the first woman to travel to every country is a misrepresented certification under §28-3904(b) as she was not the first woman to travel to every country, but is claiming she is to gain more followers on social media in order to get more money from brands in her work as an influencer. Additionally, if De Pecol is making up sponsorships, as she is perhaps doing with Virgin Galactic, that is a violation of §28-3904(b) as De Pecol is representing that she has a sponsorship that she does not have.

101. Cassandra De Pecol's claim of being the first woman to travel to every country is an instance of her misrepresenting as to a material fact which has a tendency to mislead under §28-3904(f), as she was not the first woman to travel to every country, but is claiming she is in to gain more followers on social media in order to get more money from brands in her work as an influencer. Additionally, Traveler's United asserts that defendant misrepresents a material fact which has a tendency to mislead under §28-3904(f) when she advertises products online through her social media channels without disclosing she received money to show those products.

102. Cassandra De Pecol and her LLC, Expedition 196, knew and should have known that reasonable consumers she was advertising to without disclosure may believe she just liked a certain product and may purchase that product accordingly, without realizing that she was being paid to promote a product. Consumers were deceived by the lack of disclosures.

103. Cassandra De Pecol's claims, which she also makes on her Expedition 196 website, of being the first documented woman to travel to every country claim is a use of innuendo or ambiguity as to a material fact under 28-3904(f-1); which has a tendency to mislead as defendant usually tries to imply that Guinness World Records, or some other document certifying organization, certified her claim of being the first documented woman to every country when it did not. No travel certification organization or records company certified Cassandra De Pecol is the first documented woman to visit every country. Multiple other women have documents proving that they went to every country long before De Pecol. There is only one organization that world travelers can currently use to certify travels to every country and that is NomadMania. De Pecol was never certified as having visited every country by NomadMania. Defendant's fifteen airport turnarounds do not count as a country visit per NomadMania rules. Seeing as her travels make her ineligible to be verified by NomadMania, she certainly has not been documented by them as either traveling to every country or as the first woman to do so.

104. Cassandra De Pecol and her LLC, Expedition 196, disparage the goods, services, or business of another by false or misleading representations of material facts as it relates to her claim of being the "first woman to travel to every country" in violation of §28-3904(g). De Pecol has refused to acknowledge the women who went before her and often has said that they have no proof of their travels when in fact they have extensive documented proof, these women have offered proof of their travels to some of the most serious news organizations in the world. Nina Sedano, who lives in Germany, wrote a book that was published in German in 2014 about her travels to every country. She has since written two additional books. Sedano's books are available for purchase through



Amazon to residents of the District. Counsel for Travelers United was able to use the American Amazon website to purchase Sedano's book and have it directly delivered to her Kindle at her home in the District. German is, after Spanish, French, and Amharic/Ethiopian, the fourth most common language spoken in the District.<sup>139</sup> Sedano often shows her passports and proof of travel to German press. De Pecol has diligently worked to belittle the accomplishments and documentation of Nina Sedano, who sells books based on her accomplishments of having traveled to all 193 UN countries well before defendant. Defendant must be compelled to stop implying or stating that other women do not have documented proof of their travels when in fact they do.

105. Additionally, Cassandra De Pecol and her LLC, Expedition 196, disparage the goods, services, or business of another by false or misleading representations of material facts as it relates to her claim of being the "first documented woman to travel to every country" in violation of §28-3904(g). Defendant has purposefully ignored the existence of NomadMania as a travel certification option likely because their rules of what counts as a visit to a country mean that defendant herself has not been to every country. Defendant purposefully told press that this organization did not exist, and falsely stated that no organization that validated travel accomplishments existed other than Guinness World Records when she highly likely knew that NomadMania did exist. The extreme travel community is small. According to NomadMania's own posted rules they would not document De Pecol as having visited every country due to all of her airport visits.

Women, though not defendant, have been documented as visiting every country on

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<sup>139</sup> Hamutal Bernstein, Julia Gelatt, Devlin Hanson and William Monson, *Ten Years of Language Access in Washington, DC, URBAN INSTITUTE*, (April 2014) <https://ohr.dc.gov/sites/default/files/dc/sites/ohr/publication/attachments/Language%20Access%20in%20Washington%20DC%200408%20final.pdf>.

NomadMania. There is a general travel certification website and it's called NomadMania. Defendant often asserts the only one that exists is Guinness World Records (GWR) even though the only two world travel claims that can be established through GWR are "Fastest time to every sovereign nation", which defendant held from 2017-2018, and "Youngest person to visit every sovereign nation." GWR does not document and certify the travels of regular people who want to travel to every country.

### **Prayer for Relief**

WHEREFORE, Travelers United respectfully requests this Court enter a judgment in its favor and grant relief against Defendant, as follows:

- (a) Permanently enjoin and restrain Defendant, pursuant to D.C. Code § 28-3905(k)(2)(D), from engaging in conduct determined to be in violation of the CPPA;
- (b) Permanently enjoin Defendant from advertising without disclosing that she is advertising in addition to permanently enjoining Defendant to cease from falsely claiming to be the first woman to travel to every country as well as corrective advertising to her 311 existing Instagram posts and fifteen TikToks that contain undisclosed advertisements;
- (c) Order the Defendant to pay statutory damages to Travelers United pursuant to D.C. Code § 28-3905(k)(2)(A), for each and every violation of the CPPA proven at trial;
- (d) Order the Defendant to pay punitive damages in an amount to be determined at trial, pursuant to D.C. Code § 28-3905(k)(2)(C);
- (e) Award Travelers United the costs and reasonable attorneys' and expert fees for its investigation and this action, pursuant to D.C. Code § 28-3905(k)(2)(B); and

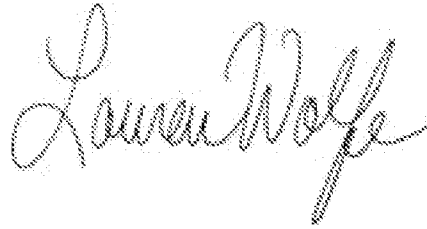
(f) Grant such further relief as the Court deems just and proper.

**Jury Demand**

Travelers United demands a trial by jury.

Respectfully submitted,

Dated: March 15, 2021

A handwritten signature in cursive script that reads "Lauren Wolfe". The signature is written in dark ink and is positioned to the right of the date.

LAUREN WOLFE (D.C. Bar # 1048660)  
Counsel, Travelers United

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## Appendix

### Defendant's Instagram Posts

Date	Post ID	Caption	Location	Tagged	Comments	Likes
2017-01-01	1000000000000000	Happy New Year!	Los Angeles, CA		10	10
2017-01-02	1000000000000001	Good morning!	Los Angeles, CA		5	5
2017-01-03	1000000000000002	Beautiful day!	Los Angeles, CA		8	8
2017-01-04	1000000000000003	Feeling good!	Los Angeles, CA		12	12
2017-01-05	1000000000000004	Love this city!	Los Angeles, CA		15	15
2017-01-06	1000000000000005	Amazing view!	Los Angeles, CA		20	20
2017-01-07	1000000000000006	Great day!	Los Angeles, CA		18	18
2017-01-08	1000000000000007	Happy Monday!	Los Angeles, CA		10	10
2017-01-09	1000000000000008	Beautiful sunset!	Los Angeles, CA		25	25
2017-01-10	1000000000000009	Good night!	Los Angeles, CA		12	12
2017-01-11	1000000000000010	Happy Tuesday!	Los Angeles, CA		15	15
2017-01-12	1000000000000011	Beautiful day!	Los Angeles, CA		18	18
2017-01-13	1000000000000012	Great view!	Los Angeles, CA		22	22
2017-01-14	1000000000000013	Love this city!	Los Angeles, CA		20	20
2017-01-15	1000000000000014	Amazing sunset!	Los Angeles, CA		28	28
2017-01-16	1000000000000015	Good night!	Los Angeles, CA		15	15
2017-01-17	1000000000000016	Happy Wednesday!	Los Angeles, CA		18	18
2017-01-18	1000000000000017	Beautiful day!	Los Angeles, CA		20	20
2017-01-19	1000000000000018	Great view!	Los Angeles, CA		25	25
2017-01-20	1000000000000019	Love this city!	Los Angeles, CA		22	22
2017-01-21	1000000000000020	Amazing sunset!	Los Angeles, CA		30	30
2017-01-22	1000000000000021	Good night!	Los Angeles, CA		18	18
2017-01-23	1000000000000022	Happy Thursday!	Los Angeles, CA		20	20
2017-01-24	1000000000000023	Beautiful day!	Los Angeles, CA		22	22
2017-01-25	1000000000000024	Great view!	Los Angeles, CA		28	28
2017-01-26	1000000000000025	Love this city!	Los Angeles, CA		25	25
2017-01-27	1000000000000026	Amazing sunset!	Los Angeles, CA		32	32
2017-01-28	1000000000000027	Good night!	Los Angeles, CA		20	20
2017-01-29	1000000000000028	Happy Friday!	Los Angeles, CA		22	22
2017-01-30	1000000000000029	Beautiful day!	Los Angeles, CA		25	25
2017-01-31	1000000000000030	Great view!	Los Angeles, CA		30	30
2017-02-01	1000000000000031	Love this city!	Los Angeles, CA		28	28
2017-02-02	1000000000000032	Amazing sunset!	Los Angeles, CA		35	35
2017-02-03	1000000000000033	Good night!	Los Angeles, CA		22	22
2017-02-04	1000000000000034	Happy Saturday!	Los Angeles, CA		25	25
2017-02-05	1000000000000035	Beautiful day!	Los Angeles, CA		28	28
2017-02-06	1000000000000036	Great view!	Los Angeles, CA		32	32
2017-02-07	1000000000000037	Love this city!	Los Angeles, CA		30	30
2017-02-08	1000000000000038	Amazing sunset!	Los Angeles, CA		38	38
2017-02-09	1000000000000039	Good night!	Los Angeles, CA		25	25
2017-02-10	1000000000000040	Happy Sunday!	Los Angeles, CA		28	28
2017-02-11	1000000000000041	Beautiful day!	Los Angeles, CA		30	30
2017-02-12	1000000000000042	Great view!	Los Angeles, CA		35	35
2017-02-13	1000000000000043	Love this city!	Los Angeles, CA		32	32
2017-02-14	1000000000000044	Amazing sunset!	Los Angeles, CA		40	40
2017-02-15	1000000000000045	Good night!	Los Angeles, CA		30	30
2017-02-16	1000000000000046	Happy Monday!	Los Angeles, CA		32	32
2017-02-17	1000000000000047	Beautiful day!	Los Angeles, CA		35	35
2017-02-18	1000000000000048	Great view!	Los Angeles, CA		40	40
2017-02-19	1000000000000049	Love this city!	Los Angeles, CA		38	38
2017-02-20	1000000000000050	Amazing sunset!	Los Angeles, CA		45	45
2017-02-21	1000000000000051	Good night!	Los Angeles, CA		35	35
2017-02-22	1000000000000052	Happy Tuesday!	Los Angeles, CA		38	38
2017-02-23	1000000000000053	Beautiful day!	Los Angeles, CA		40	40
2017-02-24	1000000000000054	Great view!	Los Angeles, CA		45	45
2017-02-25	1000000000000055	Love this city!	Los Angeles, CA		42	42
2017-02-26	1000000000000056	Amazing sunset!	Los Angeles, CA		50	50
2017-02-27	1000000000000057	Good night!	Los Angeles, CA		40	40
2017-02-28	1000000000000058	Happy Wednesday!	Los Angeles, CA		42	42
2017-02-29	1000000000000059	Beautiful day!	Los Angeles, CA		45	45
2017-03-01	1000000000000060	Great view!	Los Angeles, CA		50	50













## Defendant's TikToks

Date	Topic	Source	Link
May 8, 2021	Travel	Officer Travel + Leaning Article that says "17-year-old Bahraini First	<a href="https://www.tiktok.com/@officertravel/video/6933071745428188783">https://www.tiktok.com/@officertravel/video/6933071745428188783</a>
May 4, 2021	Traveling Back	None	<a href="https://www.tiktok.com/@officertravel/video/6933055595598513211">https://www.tiktok.com/@officertravel/video/6933055595598513211</a>
May 3, 2021	One Valley	None	<a href="https://www.tiktok.com/@officertravel/video/6933049223281335458">https://www.tiktok.com/@officertravel/video/6933049223281335458</a>
May 1, 2021	Car Robbery	None	<a href="https://www.tiktok.com/@officertravel/video/6932738135323885734">https://www.tiktok.com/@officertravel/video/6932738135323885734</a>
April 2, 2021	Monday Ad	This is an ad for her Monday podcast	<a href="https://www.tiktok.com/@officertravel/video/6931949467254812141">https://www.tiktok.com/@officertravel/video/6931949467254812141</a>
March 21, 2021	Suburban to Thelens	"I became the first woman on record to travel to every country"	<a href="https://www.tiktok.com/@officertravel/video/6931707353881862222">https://www.tiktok.com/@officertravel/video/6931707353881862222</a>
March 20, 2021	Travel	"I just got to SA... the first woman on record to travel to every country"	<a href="https://www.tiktok.com/@officertravel/video/6931524114462488782">https://www.tiktok.com/@officertravel/video/6931524114462488782</a>
March 18, 2021	Turkmenistan	None	<a href="https://www.tiktok.com/@officertravel/video/6931318151815118182">https://www.tiktok.com/@officertravel/video/6931318151815118182</a>
March 15, 2021	Turkmenistan	None	<a href="https://www.tiktok.com/@officertravel/video/69311457356838382">https://www.tiktok.com/@officertravel/video/69311457356838382</a>
March 8, 2021	Japan	None	<a href="https://www.tiktok.com/@officertravel/video/6930702131346717182">https://www.tiktok.com/@officertravel/video/6930702131346717182</a>
March 4, 2021	Serbia	None	<a href="https://www.tiktok.com/@officertravel/video/693042112121212182">https://www.tiktok.com/@officertravel/video/693042112121212182</a>
March 3, 2021	Serbia	None	<a href="https://www.tiktok.com/@officertravel/video/6930402112121212182">https://www.tiktok.com/@officertravel/video/6930402112121212182</a>
March 2, 2021	Palestine	None	<a href="https://www.tiktok.com/@officertravel/video/693037110718781444222">https://www.tiktok.com/@officertravel/video/693037110718781444222</a>
February 27, 2021	Palestine	"I arrived with my friend who was a Palestinian"	<a href="https://www.tiktok.com/@officertravel/video/693024848212482">https://www.tiktok.com/@officertravel/video/693024848212482</a>
February 26, 2021	Palestine	None	<a href="https://www.tiktok.com/@officertravel/video/693023848212482">https://www.tiktok.com/@officertravel/video/693023848212482</a>
February 24, 2021	Grenada	None	<a href="https://www.tiktok.com/@officertravel/video/693020212121212182">https://www.tiktok.com/@officertravel/video/693020212121212182</a>
February 20, 2021	Grenada	None	<a href="https://www.tiktok.com/@officertravel/video/693019421071878144222">https://www.tiktok.com/@officertravel/video/693019421071878144222</a>
February 19, 2021	Tanzania	None	<a href="https://www.tiktok.com/@officertravel/video/693018421071878144222">https://www.tiktok.com/@officertravel/video/693018421071878144222</a>
February 17, 2021	Antarctica	"I traveled to Antarctica then came with Quarantined"	<a href="https://www.tiktok.com/@officertravel/video/6930171812121212182">https://www.tiktok.com/@officertravel/video/6930171812121212182</a>
February 16, 2021	Antarctica	This trip was paid for by Quarantined but she never mentions it	<a href="https://www.tiktok.com/@officertravel/video/6930161812121212182">https://www.tiktok.com/@officertravel/video/6930161812121212182</a>
February 13, 2021	Hotel Recommendation	"If I could tell you one hotel to visit in your life, it would be this one."	<a href="https://www.tiktok.com/@officertravel/video/6930151812121212182">https://www.tiktok.com/@officertravel/video/6930151812121212182</a>
February 11, 2021	Italy	None	<a href="https://www.tiktok.com/@officertravel/video/6930141812121212182">https://www.tiktok.com/@officertravel/video/6930141812121212182</a>
February 10, 2021	Saudi Arabia	None	<a href="https://www.tiktok.com/@officertravel/video/6930131812121212182">https://www.tiktok.com/@officertravel/video/6930131812121212182</a>
February 9, 2021	Saudi Arabia	None	<a href="https://www.tiktok.com/@officertravel/video/6930121812121212182">https://www.tiktok.com/@officertravel/video/6930121812121212182</a>
February 8, 2021	Saudi Arabia	None	<a href="https://www.tiktok.com/@officertravel/video/6930111812121212182">https://www.tiktok.com/@officertravel/video/6930111812121212182</a>
February 7, 2021	Mongolia	None	<a href="https://www.tiktok.com/@officertravel/video/6930101812121212182">https://www.tiktok.com/@officertravel/video/6930101812121212182</a>
February 6, 2021	Liba	None	<a href="https://www.tiktok.com/@officertravel/video/6930091812121212182">https://www.tiktok.com/@officertravel/video/6930091812121212182</a>
February 5, 2021	Democratic Republic of Congo	None	<a href="https://www.tiktok.com/@officertravel/video/6930081812121212182">https://www.tiktok.com/@officertravel/video/6930081812121212182</a>
February 4, 2021	Budapest Food	None	<a href="https://www.tiktok.com/@officertravel/video/6930071812121212182">https://www.tiktok.com/@officertravel/video/6930071812121212182</a>
February 3, 2021	Iranian	Iranian photos, Quarantined photos, Yoga coffee shop from AZ	<a href="https://www.tiktok.com/@officertravel/video/6930061812121212182">https://www.tiktok.com/@officertravel/video/6930061812121212182</a>
January 27, 2021	Iran	Danesh hotel	<a href="https://www.tiktok.com/@officertravel/video/6930051812121212182">https://www.tiktok.com/@officertravel/video/6930051812121212182</a>
January 26, 2021	Cuba	None	<a href="https://www.tiktok.com/@officertravel/video/6930041812121212182">https://www.tiktok.com/@officertravel/video/6930041812121212182</a>
January 25, 2021	Italy	None	<a href="https://www.tiktok.com/@officertravel/video/6930031812121212182">https://www.tiktok.com/@officertravel/video/6930031812121212182</a>
January 24, 2021	Italy	None	<a href="https://www.tiktok.com/@officertravel/video/6930021812121212182">https://www.tiktok.com/@officertravel/video/6930021812121212182</a>
January 23, 2021	Pakistan	None	<a href="https://www.tiktok.com/@officertravel/video/6930011812121212182">https://www.tiktok.com/@officertravel/video/6930011812121212182</a>
January 21, 2021	Iranian	Video claim "On February 2, 2021 I finished my Guinness World Book	<a href="https://www.tiktok.com/@officertravel/video/6929991812121212182">https://www.tiktok.com/@officertravel/video/6929991812121212182</a>
January 20, 2021	Somalia	Peace Hotel mentioned but it is not mentioned that they sponsored it	<a href="https://www.tiktok.com/@officertravel/video/6929981812121212182">https://www.tiktok.com/@officertravel/video/6929981812121212182</a>
January 19, 2021	Shuzen	None	<a href="https://www.tiktok.com/@officertravel/video/6929971812121212182">https://www.tiktok.com/@officertravel/video/6929971812121212182</a>
January 18, 2021	Neel and Aftab	None	<a href="https://www.tiktok.com/@officertravel/video/6929961812121212182">https://www.tiktok.com/@officertravel/video/6929961812121212182</a>
January 17, 2021	Travel	None	<a href="https://www.tiktok.com/@officertravel/video/6929951812121212182">https://www.tiktok.com/@officertravel/video/6929951812121212182</a>
January 16, 2021	Afghanistan	None	<a href="https://www.tiktok.com/@officertravel/video/6929941812121212182">https://www.tiktok.com/@officertravel/video/6929941812121212182</a>
January 15, 2021	Afghanistan	Video claim "In 2015 I traveled to Afghanistan on a mission where I"	<a href="https://www.tiktok.com/@officertravel/video/6929931812121212182">https://www.tiktok.com/@officertravel/video/6929931812121212182</a>

January 05, 2021	Playing for Travel	None	<a href="https://www.954.com/2021/01/05/playing-for-travel/">https://www.954.com/2021/01/05/playing-for-travel/</a>
January 14, 2021	North Korea	None	<a href="https://www.954.com/2021/01/14/north-korea/">https://www.954.com/2021/01/14/north-korea/</a>
January 15, 2021	North Korea	"I am a US citizen and I traveled alone."	<a href="https://www.954.com/2021/01/15/north-korea-i-am-a-us-citizen-and-i-traveled-alone/">https://www.954.com/2021/01/15/north-korea-i-am-a-us-citizen-and-i-traveled-alone/</a>
January 11, 2021	Face cover	"First woman on United to travel to every country in the world"	<a href="https://www.954.com/2021/01/11/face-cover-first-woman-on-united-to-travel-to-every-country-in-the-world/">https://www.954.com/2021/01/11/face-cover-first-woman-on-united-to-travel-to-every-country-in-the-world/</a>
December 13, 2020	Car Backpack	De Pless is known to promote affiliate links in this car backpack	<a href="https://www.954.com/2020/12/13/car-backpack/">https://www.954.com/2020/12/13/car-backpack/</a>
November 18, 2020	Passports	None	<a href="https://www.954.com/2020/11/18/passports/">https://www.954.com/2020/11/18/passports/</a>
November 5, 2020	My Vision There	"So you are almost 40? Yes. And you've never been married? No. A"	<a href="https://www.954.com/2020/11/05/my-vision-there/">https://www.954.com/2020/11/05/my-vision-there/</a>
October 24, 2020	Car	None	<a href="https://www.954.com/2020/10/24/car/">https://www.954.com/2020/10/24/car/</a>
September 02, 2020	Mexico	Beach - Tucson hotel with different. This time sponsored De Pless	<a href="https://www.954.com/2020/09/02/mexico/">https://www.954.com/2020/09/02/mexico/</a>
September 02, 2020	Her YouTube Channel	None	<a href="https://www.954.com/2020/09/02/her-youtube-channel/">https://www.954.com/2020/09/02/her-youtube-channel/</a>
September 02, 2020	Sea	"I went on a brand trip there" (meaning her) but she never mentions	<a href="https://www.954.com/2020/09/02/sea/">https://www.954.com/2020/09/02/sea/</a>
September 02, 2020	Antarctica	Her trip to Antarctica was sponsored, she never mentions this Beach	<a href="https://www.954.com/2020/09/02/antarctica/">https://www.954.com/2020/09/02/antarctica/</a>
September 02, 2020	Fig	None	<a href="https://www.954.com/2020/09/02/fig/">https://www.954.com/2020/09/02/fig/</a>
September 02, 2020	Car	None	<a href="https://www.954.com/2020/09/02/car/">https://www.954.com/2020/09/02/car/</a>
September 02, 2020	Pool	None	<a href="https://www.954.com/2020/09/02/pool/">https://www.954.com/2020/09/02/pool/</a>
September 02, 2020	Car	None	<a href="https://www.954.com/2020/09/02/car/">https://www.954.com/2020/09/02/car/</a>
September 02, 2020	Cherry First Woman on Travel	Cherry First Woman on Travel + Leisure / Business Insider piece in the tab	<a href="https://www.954.com/2020/09/02/cherry-first-woman-on-travel/">https://www.954.com/2020/09/02/cherry-first-woman-on-travel/</a>
September 02, 2020	North Korea	None	<a href="https://www.954.com/2020/09/02/north-korea/">https://www.954.com/2020/09/02/north-korea/</a>
September 02, 2020	Pumpkin	None	<a href="https://www.954.com/2020/09/02/pumpkin/">https://www.954.com/2020/09/02/pumpkin/</a>
September 02, 2020	Learning	Garmin watch prominently displayed in video with no mention of spec	<a href="https://www.954.com/2020/09/02/learning/">https://www.954.com/2020/09/02/learning/</a>
September 02, 2020	Car	None	<a href="https://www.954.com/2020/09/02/car/">https://www.954.com/2020/09/02/car/</a>
August 11, 2020	Antarctica	Sponsored Trip by Quark Expeditions and no mention of that	<a href="https://www.954.com/2020/08/11/antarctica/">https://www.954.com/2020/08/11/antarctica/</a>
November 08, 2019	Car	affiliatetravel.com used when goes back to a Boston meeting camp	<a href="https://www.954.com/2019/11/08/car/">https://www.954.com/2019/11/08/car/</a>
November 22, 2019	Beach	None	<a href="https://www.954.com/2019/11/22/beach/">https://www.954.com/2019/11/22/beach/</a>
November 22, 2019	Nature	None	<a href="https://www.954.com/2019/11/22/nature/">https://www.954.com/2019/11/22/nature/</a>
November 22, 2019	Dubai	None	<a href="https://www.954.com/2019/11/22/dubai/">https://www.954.com/2019/11/22/dubai/</a>
November 22, 2019	Trip	None	<a href="https://www.954.com/2019/11/22/trip/">https://www.954.com/2019/11/22/trip/</a>
November 21, 2019	Wegins	None	<a href="https://www.954.com/2019/11/21/wegins/">https://www.954.com/2019/11/21/wegins/</a>
November 21, 2019	Wegins	None	<a href="https://www.954.com/2019/11/21/wegins/">https://www.954.com/2019/11/21/wegins/</a>
November 21, 2019	Flying	None	<a href="https://www.954.com/2019/11/21/flying/">https://www.954.com/2019/11/21/flying/</a>
November 21, 2019	Flaming the advertisement	Not enough disclosure for a video. See on video Beach. "Shooting i	<a href="https://www.954.com/2019/11/21/flaming-the-advertisement/">https://www.954.com/2019/11/21/flaming-the-advertisement/</a>
November 21, 2019	Car	None	<a href="https://www.954.com/2019/11/21/car/">https://www.954.com/2019/11/21/car/</a>
November 20, 2019	Training	None	<a href="https://www.954.com/2019/11/20/training/">https://www.954.com/2019/11/20/training/</a>
November 20, 2019	Foot	None	<a href="https://www.954.com/2019/11/20/foot/">https://www.954.com/2019/11/20/foot/</a>
November 20, 2019	Training	None	<a href="https://www.954.com/2019/11/20/training/">https://www.954.com/2019/11/20/training/</a>
November 20, 2019	Flying	affiliatetravel used as a back tag which seems to go back to a carpool	<a href="https://www.954.com/2019/11/20/flying/">https://www.954.com/2019/11/20/flying/</a>
November 20, 2019	Car	Walmart is mentioned in the footage which seems to go back	<a href="https://www.954.com/2019/11/20/car/">https://www.954.com/2019/11/20/car/</a>
November 15, 2019	Passports	affiliatetravel is mentioned in the footage which seems to go back	<a href="https://www.954.com/2019/11/15/passports/">https://www.954.com/2019/11/15/passports/</a>



SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION Civil Actions Branch  
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001  
Telephone: (202) 879-1133 • Website: [www.dccourts.gov](http://www.dccourts.gov)

TRAVELERS UNITED

Vs.

C.A. No. 2022 CA 001194 B

EXPEDITION 196, LLC et al

**INITIAL ORDER AND ADDENDUM**

**Pursuant to D.C. Code § 11-906 and District of Columbia Superior Court Rule of Civil Procedure**  
**("Super. Ct. Civ. R.") 40-I, it is hereby ORDERED as follows:**

(1) This case is assigned to the judge and calendar designated below. All future filings in this case shall bear the calendar number and the judge's name beneath the case number in the caption.

(2) Within 60 days of the filing of the complaint, plaintiff must file proof of service on each defendant of copies of (a) the summons, (b) the complaint, and (c) this Initial Order and Addendum. The court will dismiss the claims against any defendant for whom such proof of service has not been filed by this deadline, unless the court extended the time for service under Rule 4(m).

(3) Within 21 days of service (unless otherwise provided in Rule 12), each defendant must respond to the complaint by filing an answer or other responsive pleading. The court may enter a default and a default judgment against any defendant who does not meet this deadline, unless the court extended the deadline under Rule 55(a).

(4) At the time stated below, all counsel and unrepresented parties shall participate in a remote hearing to establish a schedule and discuss the possibilities of settlement. Counsel shall discuss with their clients **before** the hearing whether the clients are agreeable to binding or non-binding arbitration. **This order is the only notice that parties and counsel will receive concerning this hearing.**

(5) If the date or time is inconvenient for any party or counsel, the Civil Actions Branch may continue the Conference **once**, with the consent of all parties, to either of the two succeeding Fridays. To reschedule the hearing, a party or lawyer may call the Branch at (202) 879-1133. Any such request must be made at least seven business days before the scheduled date.

No other continuance of the conference will be granted except upon motion for good cause shown.

(6) Parties are responsible for obtaining and complying with all requirements of the General Order for Civil cases, each judge's Supplement to the General Order and the General Mediation Order. Copies of these orders are available in the Courtroom and on the Court's website <http://www.dccourts.gov/>.

**Chief Judge Anita M. Josey-Herring**

Case Assigned to: Judge SHANA FROST MATINI

Date: March 22, 2022

Initial Conference: **REMOTE HEARING - DO NOT COME TO COURTHOUSE**  
**SEE REMOTE HEARING INSTRUCTIONS ATTACHED TO INITIAL ORDER**

9:30 am, Friday, June 17, 2022

Location: Courtroom 517

500 Indiana Avenue N.W.

WASHINGTON, DC 20001

## ADDENDUM TO INITIAL ORDER AFFECTING ALL MEDICAL MALPRACTICE CASES

D.C. Code § 16-2821, which part of the Medical Malpractice Proceedings Act of 2006, provides, "[a]fter action is filed in the court against a healthcare provider alleging medical malpractice, the court shall require the parties to enter into mediation, without discovery or, if all parties agree[,] with only limited discovery that will not interfere with the completion of mediation within 30 days of the Initial Scheduling and Settlement Conference ('ISSC'), prior to any further litigation in an effort to reach a settlement agreement. The early mediation schedule shall be included in the Scheduling Order following the ISSC. Unless all parties agree, the stay of discovery shall not be more than 30 days after the ISSC."

To ensure compliance with this legislation, on or before the date of the ISSC, the Court will notify all attorneys and *pro se* parties of the date and time of the early mediation session and the name of the assigned mediator. Information about the early mediation date also is available over the internet at <https://www.dccourts.gov/pa/>. To facilitate this process, all counsel and *pro se* parties in every medical malpractice case are required to confer, jointly complete and sign an EARLY MEDIATION FORM, which must be filed no later than ten (10) calendar days prior to the ISSC. D.C. Code § 16-2825 Two separate Early Mediation Forms are available. Both forms may be obtained at [www.dccourts.gov/medmalmediation](http://www.dccourts.gov/medmalmediation). One form is to be used for early mediation with a mediator from the multi-door medical malpractice mediator roster; the second form is to be used for early mediation with a private mediator. Plaintiff's counsel is responsible for eFiling the form and is required to e-mail a courtesy copy to [earlymedmal@dcsc.gov](mailto:earlymedmal@dcsc.gov). Unrepresented plaintiffs who elect not to eFile must either mail the form to the Multi-Door Dispute Resolution Office at, Suite 2900, 410 E Street, N.W., Washington, DC 20001, or deliver it in person if the Office is open for in-person visits.

A roster of medical malpractice mediators available through the Court's Multi-Door Dispute Resolution Division, with biographical information about each mediator, can be found at [www.dccourts.gov/medmalmediation/mediatorprofiles](http://www.dccourts.gov/medmalmediation/mediatorprofiles). All individuals on the roster are judges or lawyers with at least 10 years of significant experience in medical malpractice litigation. D.C. Code § 16-2823(a). If the parties cannot agree on a mediator, the Court will appoint one. D.C. Code § 16-2823(b).

The following people are required by D.C. Code § 16-2824 to attend personally the Early Mediation Conference: (1) all parties; (2) for parties that are not individuals, a representative with settlement authority; (3) in cases involving an insurance company, a representative of the company with settlement authority; and (4) attorneys representing each party with primary responsibility for the case.

No later than ten (10) days after the early mediation session has terminated, Plaintiff must eFile with the Court a report prepared by the mediator, including a private mediator, regarding: (1) attendance; (2) whether a settlement was reached; or, (3) if a settlement was not reached, any agreements to narrow the scope of the dispute, limit discovery, facilitate future settlement, hold another mediation session, or otherwise reduce the cost and time of trial preparation. D.C. Code § 16-2826. Any Plaintiff who is unrepresented may mail the form to the Civil Actions Branch at [address] or deliver it in person if the Branch is open for in-person visits. The forms to be used for early mediation reports are available at [www.dccourts.gov/medmalmediation](http://www.dccourts.gov/medmalmediation).

Chief Judge Anita M. Josey-Herring

## Civil Remote Hearing Instructions for Participants

The following instructions are for participants who are scheduled to have cases heard before a Civil Judge in a **Remote Courtroom**

### Option 1: (AUDIO ONLY/Dial-in by Phone):

Toll 1 (844) 992-4762 or (202) 860-2110, enter the Meeting ID from the attachment followed by #, press again to enter session.

- Please call in no sooner than 5 minutes before your scheduled hearing time. Once you have joined the session, please place your phone on mute until directed otherwise. If you should happen to get disconnected from the call, please call back in using the phone number and access number provided and the courtroom clerk will mute your call until the appropriate time.*

If you select **Option 2** or **Option 3** use the **Audio Alternative**

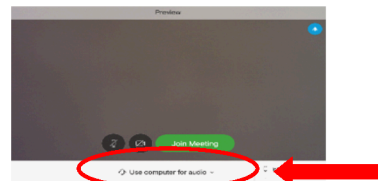
### Option 2: (LAPTOP/ DESKTOP USERS 1):

Open Web Browser in Google Chrome and copy and paste following address from the next page:  
<https://dccourts.webex.com/meet/XXXXXXXXXX>

### Option 3: (LAPTOP/ DESKTOP USERS 2):

Open Web Browser in Google Chrome and copy and paste following address  
<https://dccourts.webex.com> Select **Join**, enter the Meeting ID from the next page

**AUDIO ALTERNATIVE:** Instead of automatically using **USE COMPUTER FOR AUDIO**, select **CALL-IN** and follow the **CALL-IN** prompt window. Use a cell phone or desk phone. You will be heard clearer if you **do not** place your phone on **SPEAKER**. It is very important that you enter the **ACCESS ID #** so that your audio is matched with your video.



### Option 4: (Ipad/SMART PHONE/TABLET):

- Go to App Store, Download WebEx App (Cisco WebEx Meetings)
- Sign into the App with your Name and Email Address
- Select Join Meeting
- Enter address from the next page: <https://dccourts.webex.com/meet/XXXXXXXXXX>
- Click join and make sure your microphone is muted and your video is unmuted (if you need to be seen). If you only need to speak and do not need to be seen, use the audio only option.
- When you are ready click "Join Meeting". If the host has not yet started the meeting, you will be placed in the lobby until the meeting begins.

**For Technical Questions or issues Call: (202) 879-1928, Option #2**

Superior Court of the District of Columbia  
Public Access for Remote Court Hearings  
(Effective August 24, 2020)

**The current telephone numbers for all remote hearings are: 202-860-2110 (local) or 844-992-4726 (toll free).** After dialing the number, enter the WebEx Meeting ID as shown below for the courtroom. Please click a WebEx Direct URL link below to join the hearing online.

Audio and video recording; taking pictures of remote hearings; and sharing the live or recorded remote hearing by rebroadcasting, live-streaming or otherwise are not allowed

Division	Courtroom	Types of Hearings Scheduled in Courtroom	Public Access via WebEx	
			WebEx Direct URL	WebEx Meeting ID
Auditor Master	206	Auditor Master Hearings	<a href="https://dccourts.webex.com/meet/ctbaudmaster">https://dccourts.webex.com/meet/ctbaudmaster</a>	129 648 5606
Civil	100	Civil 2 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	<a href="https://dccourts.webex.com/meet/ctb100">https://dccourts.webex.com/meet/ctb100</a>	129 846 4145
	205	Foreclosure Matters	<a href="https://dccourts.webex.com/meet/ctb205">https://dccourts.webex.com/meet/ctb205</a>	129 814 7399
	212	Civil 2 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	<a href="https://dccourts.webex.com/meet/ctb212">https://dccourts.webex.com/meet/ctb212</a>	129 440 9070
	214	Title 47 Tax Liens; and Foreclosure Hearings	<a href="https://dccourts.webex.com/meet/ctb214">https://dccourts.webex.com/meet/ctb214</a>	129 942 2620
	219	Civil 2 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	<a href="https://dccourts.webex.com/meet/ctb219">https://dccourts.webex.com/meet/ctb219</a>	129 315 2924
	221	Civil 1 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	<a href="https://dccourts.webex.com/meet/ctb221">https://dccourts.webex.com/meet/ctb221</a>	129 493 5162
	318	Civil 2 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	<a href="https://dccourts.webex.com/meet/ctb318">https://dccourts.webex.com/meet/ctb318</a>	129 801 7169
	320		<a href="https://dccourts.webex.com/meet/ctb320">https://dccourts.webex.com/meet/ctb320</a>	129 226 9879

400	Judge in Chambers Matters including Temporary Restraining Orders, Preliminary Injunctions and Name Changes	<a href="https://dccourts.webex.com/meet/ctb400">https://dccourts.webex.com/meet/ctb400</a>	129 339 7379
415	Civil 2 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	<a href="https://dccourts.webex.com/meet/ctb415">https://dccourts.webex.com/meet/ctb415</a>	129 314 3475
516		<a href="https://dccourts.webex.com/meet/ctb516">https://dccourts.webex.com/meet/ctb516</a>	129 776 4396
517		<a href="https://dccourts.webex.com/meet/ctb517">https://dccourts.webex.com/meet/ctb517</a>	129 911 6415
518		<a href="https://dccourts.webex.com/meet/ctb518">https://dccourts.webex.com/meet/ctb518</a>	129 685 3445
519		<a href="https://dccourts.webex.com/meet/ctb519">https://dccourts.webex.com/meet/ctb519</a>	129 705 0412
JM-4		<a href="https://dccourts.webex.com/meet/ctbjm4">https://dccourts.webex.com/meet/ctbjm4</a>	129 797 7557
A-47	Housing Conditions Matters	<a href="https://dccourts.webex.com/meet/ctba47">https://dccourts.webex.com/meet/ctba47</a>	129 906 2065
B-52	Debt Collection and Landlord and Tenant Trials	<a href="https://dccourts.webex.com/meet/ctbb52">https://dccourts.webex.com/meet/ctbb52</a>	129 793 4102
B-53	Landlord and Tenant Matters including Lease Violation Hearings and Post Judgment Motions	<a href="https://dccourts.webex.com/meet/ctbb53">https://dccourts.webex.com/meet/ctbb53</a>	129 913 3728
B-109	Landlord and Tenant Matters	<a href="https://dccourts.webex.com/meet/ctbb109">https://dccourts.webex.com/meet/ctbb109</a>	129 127 9276
B-119	Small Claims Hearings and Trials	<a href="https://dccourts.webex.com/meet/ctbb119">https://dccourts.webex.com/meet/ctbb119</a>	129 230 4882