

NOTICE TO CEASE AND DESIST

From: Travelers United

Date: November 23, 2022

This letter has been served as notice of your unlawful publication of false claims by an Instagram influencer related to the promotion of your product.

IF YOU DO NOT CEASE ADVERTISING THIS CLAIM A LAWSUIT WILL BE COMMENCED AGAINST YOU. If you do not comply with this cease and desist letter by January 20, 2022, a lawsuit will be filed in Washington, D.C. seeking monetary damages as well as pursuing all available legal remedies for your lack of fact checking a commercial advertisement.

Calm, a meditation app, is valued at over a billion dollars. They have the resources to fact check the claims of the people reading content on the app. Clearly, in the case of Cassie De Pecol, they did not. On their app consumers can listen to a reading of De Pecol which is described as “Join Cassie, the first woman on record to travel to every country in the world, as she explores the tranquil serenity of Antarctica.”



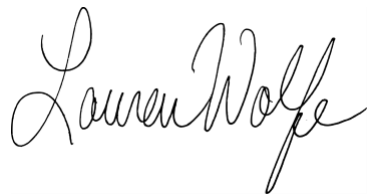
Cassandra De Pecol is not the first woman on record to travel to every country in the world. This is a misleading and deceptive claim being used by a social media influencer to get bigger brand deals. Lying about accomplishments on your app in order to sell a product is a violation of the District Consumer Protection Procedures Act. On July 11, 2022 Travelers United filed a lawsuit against Cassie De Pecol and her LLC, Expedition 196 for violating the District Consumer Protection Procedures Act.

Travelers United is a non-profit travel focused consumer advocacy group. De Pecol ignored and belittled the accomplishments of the many women who went before her in order to become a successful travel Instagram influencer. She lied about her accomplishments to press and companies to get bigger brand deals and more followers on Instagram. It is a violation of the law for you to repeat her claims in promoting your own product. For details about our case, please visit: <https://www.travelersunited.org/de-pecol-case-documents/>.

The text of this particular reading should read “Join Cassie as she explores the tranquil serenity of Antarctica.” Please remove “the first woman on record to travel to every country in the world.” Please also remove any voice recordings of this claim as well. Let us know when you have made this change.

If you do not comply with this cease and desist letter by January 20, 2022, a lawsuit will be filed in Washington, D.C. seeking monetary damages as well as pursuing all available legal remedies for your lack of fact checking in the advertisement of your products.

Sincerely,

A handwritten signature in black ink that reads "Lauren Wolfe". The signature is written in a cursive, flowing style.

LAUREN WOLFE
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