

NOTICE TO CEASE AND DESIST

From: Travelers United

Date: November 10, 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 December 31, 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.

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." Cassandra De Pecol is not the first woman to travel to all 196 countries. This is a misleading and deceptive claim being used by an Instagram influencer to get bigger brand deals. Lying about accomplishments 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 Instagram influencer. She lied about her accomplishments to press and companies to get bigger brand deals and more followers on Instagram. This is a violation of the law. For details about our case, please visit: <https://www.travelersunited.org/de-pecol-case-documents/>

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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.

By **Faye Brookman** January 30, 2018, 9:00am



Cassie De Pecol has been named a Venus ambassador. CEDRIC ANGELES



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This article can be accessed at <https://wwd.com/beauty-industry-news/body-care/venus-adds-facial-hair-removal-11131913/>

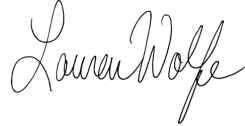
Gillette Venus part of Procter & Gamble. Procter & Gamble (P&G) is a publicly traded company with earnings of about \$10 billion dollars annually. P&G has the resources to fact check the truth of their advertising claims.

Venus (@gillettevenus) posted Instagram photos of De Pecol using their products on February 2, 2018, February 14, 2018, March 8, 2018, March 25, 2018, April 14, 2018 and May 21, 2018. Cassie De Pecol (@cassiedepecol) posted Instagram photos of herself for Venus on February 1, 2018, February 13, 2018, March 29, 2018 and April 5, 2018.

Venus likely brought on De Pecol by believing De Pecol's claim that she was the first woman to travel to every country when she was not. P&G should consider hiring fact checkers and lawyers to work in their advertising department. Somehow Venus got this claim repeated in a major publication likely due to sending out a press release with false information. Travelers United recommends all De Pecol content be removed from Venus promotion and an apology issued. P&G should honor the history and accomplishments of women who traveled across the world long before De Pecol.

If you do not comply with this cease and desist letter by December 31, 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
Counsel for Travelers United

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