



March 4, 2023

**VIA EMAIL (LAUREN.WOLFE@TRAVELERSUNITED.ORG)  
& FIRST-CLASS U.S. MAIL**

Lauren Wolfe, Esq.  
Travelers United  
2833 Alabama Ave SE, #30736  
Washington, DC 20020

**DEMAND TO CEASE AND DESIST**

**Re: *Travelers United v. Cassandra De Pecol, et al*  
2022 CA 003089 B**

Dear Ms. Wolfe:

I am writing this letter to follow up to our March 1, 2023 telephone call. During our call, I told you that we, on Cassandra De Pecol's behalf, have prepared, among other filings, a counterclaim against Travelers and a third-party complaint against *you personally* due to your repeated false and defamatory statements about Ms. De Pecol (too numerous to cite here) and your continued, malicious interference with Ms. De Pecol's business contracts and relationships. Ms. De Pecol's claims will include defamation, tortious interference with contract or business expectancy, intentional or negligent infliction of emotional distress, etc. Ms. De Pecol will be seeking actual and punitive damages well in excess of \$500,000 and injunctive relief, enjoining Travelers and you from engaging in future tortious conduct against Ms. De Pecol and her company. What is more, once we file the third-party complaint *against you personally*, we will move to disqualify you as Travelers' counsel because you will then be a party to the litigation.

During our telephone call, I also told you that given Travelers' agreement to early mediation, Ms. De Pecol has agreed to wait until after mediation to file her counterclaim against Travelers and her third-party complaint against *you personally*. PLEASE BE ADVISED, however, that if we do not settle the case in mediation, Ms. De Pecol has directed us to immediately file the counterclaim and third-party complaint. During our call, you agreed not to (1) make false and defamatory public statements about Ms. De Pecol and (2) refrain from contacting any third parties regarding Ms. De Pecol, including the media, her sponsors, business partners, affiliates, etc.

**Lauren Wolfe, Esq.**

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PLEASE BE FURTHER ADVISED that per our agreement, Ms. De Pecol requests and indeed HEREBY DEMANDS that you and travelers CEASE AND DESIST making false and defamatory statements about Ms. De Pecol and contacting Ms. De Pecol's sponsors, business partners, affiliates, etc. or interfering with her business relationships. If either Travelers or you fail to cease and desist, Ms. De Pecol has instructed us to forgo or cancel the mediation and to mount a vigorous and unrelenting offense against Travelers and *you personally*.

I remain optimistic that the parties will be able to settle the case during mediation, and I would strongly urge Travelers to give due consideration to settlement in lieu of the costly, yearslong litigation that will follow unless Travelers agrees to a settlement.

I remain, very sincerely yours,

/s/

Albert Wilson Jr.

cc: Cassandra De Pecol

