

Lauren Wolfe
D.C. Bar No. 1048660
Travelers United
2833 Alabama Ave SE Unit 30736
Washington, DC 20020
Telephone: 202-713-9596
Email: lauren.wolfe@travelersunited.org
Counsel for Plaintiff

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

Travelers United,

Plaintiff,

v.

Expedition 196, LLC, et al.,

Defendants.

Case Number 2022 CA 003089 B
Judge: Neal Kravitz

**PLAINTIFF'S SUBPOENA TO MARRIOTT INTERNATIONAL, INC.
FOR PRODUCTION OF DOCUMENTS**

© 2011 Blackwell Publishing Ltd *Journal of Internal Medicine* 270: 101–110

1. $\frac{1}{2}$ 2. $\frac{1}{3}$ 3. $\frac{1}{4}$ 4. $\frac{1}{5}$ 5. $\frac{1}{6}$ 6. $\frac{1}{7}$ 7. $\frac{1}{8}$ 8. $\frac{1}{9}$ 9. $\frac{1}{10}$ 10. $\frac{1}{11}$ 11. $\frac{1}{12}$ 12. $\frac{1}{13}$ 13. $\frac{1}{14}$ 14. $\frac{1}{15}$ 15. $\frac{1}{16}$ 16. $\frac{1}{17}$ 17. $\frac{1}{18}$ 18. $\frac{1}{19}$ 19. $\frac{1}{20}$ 20. $\frac{1}{21}$ 21. $\frac{1}{22}$ 22. $\frac{1}{23}$ 23. $\frac{1}{24}$ 24. $\frac{1}{25}$ 25. $\frac{1}{26}$ 26. $\frac{1}{27}$ 27. $\frac{1}{28}$ 28. $\frac{1}{29}$ 29. $\frac{1}{30}$ 30. $\frac{1}{31}$ 31. $\frac{1}{32}$ 32. $\frac{1}{33}$ 33. $\frac{1}{34}$ 34. $\frac{1}{35}$ 35. $\frac{1}{36}$ 36. $\frac{1}{37}$ 37. $\frac{1}{38}$ 38. $\frac{1}{39}$ 39. $\frac{1}{40}$ 40. $\frac{1}{41}$ 41. $\frac{1}{42}$ 42. $\frac{1}{43}$ 43. $\frac{1}{44}$ 44. $\frac{1}{45}$ 45. $\frac{1}{46}$ 46. $\frac{1}{47}$ 47. $\frac{1}{48}$ 48. $\frac{1}{49}$ 49. $\frac{1}{50}$ 50. $\frac{1}{51}$ 51. $\frac{1}{52}$ 52. $\frac{1}{53}$ 53. $\frac{1}{54}$ 54. $\frac{1}{55}$ 55. $\frac{1}{56}$ 56. $\frac{1}{57}$ 57. $\frac{1}{58}$ 58. $\frac{1}{59}$ 59. $\frac{1}{60}$ 60. $\frac{1}{61}$ 61. $\frac{1}{62}$ 62. $\frac{1}{63}$ 63. $\frac{1}{64}$ 64. $\frac{1}{65}$ 65. $\frac{1}{66}$ 66. $\frac{1}{67}$ 67. $\frac{1}{68}$ 68. $\frac{1}{69}$ 69. $\frac{1}{70}$ 70. $\frac{1}{71}$ 71. $\frac{1}{72}$ 72. $\frac{1}{73}$ 73. $\frac{1}{74}$ 74. $\frac{1}{75}$ 75. $\frac{1}{76}$ 76. $\frac{1}{77}$ 77. $\frac{1}{78}$ 78. $\frac{1}{79}$ 79. $\frac{1}{80}$ 80. $\frac{1}{81}$ 81. $\frac{1}{82}$ 82. $\frac{1}{83}$ 83. $\frac{1}{84}$ 84. $\frac{1}{85}$ 85. $\frac{1}{86}$ 86. $\frac{1}{87}$ 87. $\frac{1}{88}$ 88. $\frac{1}{89}$ 89. $\frac{1}{90}$ 90. $\frac{1}{91}$ 91. $\frac{1}{92}$ 92. $\frac{1}{93}$ 93. $\frac{1}{94}$ 94. $\frac{1}{95}$ 95. $\frac{1}{96}$ 96. $\frac{1}{97}$ 97. $\frac{1}{98}$ 98. $\frac{1}{99}$ 99. $\frac{1}{100}$ 100. $\frac{1}{101}$ 101. $\frac{1}{102}$ 102. $\frac{1}{103}$ 103. $\frac{1}{104}$ 104. $\frac{1}{105}$ 105. $\frac{1}{106}$ 106. $\frac{1}{107}$ 107. $\frac{1}{108}$ 108. $\frac{1}{109}$ 109. $\frac{1}{110}$ 110. $\frac{1}{111}$ 111. $\frac{1}{112}$ 112. $\frac{1}{113}$ 113. $\frac{1}{114}$ 114. $\frac{1}{115}$ 115. $\frac{1}{116}$ 116. $\frac{1}{117}$ 117. $\frac{1}{118}$ 118. $\frac{1}{119}$ 119. $\frac{1}{120}$ 120. $\frac{1}{121}$ 121. $\frac{1}{122}$ 122. $\frac{1}{123}$ 123. $\frac{1}{124}$ 124. $\frac{1}{125}$ 125. $\frac{1}{126}$ 126. $\frac{1}{127}$ 127. $\frac{1}{128}$ 128. $\frac{1}{129}$ 129. $\frac{1}{130}$ 130. $\frac{1}{131}$ 131. $\frac{1}{132}$ 132. $\frac{1}{133}$ 133. $\frac{1}{134}$ 134. $\frac{1}{135}$ 135. $\frac{1}{136}$ 136. $\frac{1}{137}$ 137. $\frac{1}{138}$ 138. $\frac{1}{139}$ 139. $\frac{1}{140}$ 140. $\frac{1}{141}$ 141. $\frac{1}{142}$ 142. $\frac{1}{143}$ 143. $\frac{1}{144}$ 144. $\frac{1}{145}$ 145. $\frac{1}{146}$ 146. $\frac{1}{147}$ 147. $\frac{1}{148}$ 148. $\frac{1}{149}$ 149. $\frac{1}{150}$ 150. $\frac{1}{151}$ 151. $\frac{1}{152}$ 152. $\frac{1}{153}$ 153. $\frac{1}{154}$ 154. $\frac{1}{155}$ 155. $\frac{1}{156}$ 156. $\frac{1}{157}$ 157. $\frac{1}{158}$ 158. $\frac{1}{159}$ 159. $\frac{1}{160}$ 160. $\frac{1}{161}$ 161. $\frac{1}{162}$ 162. $\frac{1}{163}$ 163. $\frac{1}{164}$ 164. $\frac{1}{165}$ 165. $\frac{1}{166}$ 166. $\frac{1}{167}$ 167. $\frac{1}{168}$ 168. $\frac{1}{169}$ 169. $\frac{1}{170}$ 170. $\frac{1}{171}$ 171. $\frac{1}{172}$ 172. $\frac{1}{173}$ 173. $\frac{1}{174}$ 174. $\frac{1}{175}$ 175. $\frac{1}{176}$ 176. $\frac{1}{177}$ 177. $\frac{1}{178}$ 178. $\frac{1}{179}$ 179. $\frac{1}{180}$ 180. $\frac{1}{181}$ 181. $\frac{1}{182}$ 182. $\frac{1}{183}$ 183. $\frac{1}{184}$ 184. $\frac{1}{185}$ 185. $\frac{1}{186}$ 186. $\frac{1}{187}$ 187. $\frac{1}{188}$ 188. $\frac{1}{189}$ 189. $\frac{1}{190}$ 190. $\frac{1}{191}$ 191. $\frac{1}{192}$ 192. $\frac{1}{193}$ 193. $\frac{1}{194}$ 194. $\frac{1}{195}$ 195. $\frac{1}{196}$ 196. $\frac{1}{197}$ 197. $\frac{1}{198}$ 198. $\frac{1}{199}$ 199. $\frac{1}{200}$ 200. $\frac{1}{201}$ 201. $\frac{1}{202}$ 202. $\frac{1}{203}$ 203. $\frac{1}{204}$ 204. $\frac{1}{205}$ 205. $\frac{1}{206}$ 206. $\frac{1}{207}$ 207. $\frac{1}{208}$ 208. $\frac{1}{209}$ 209. $\frac{1}{210}$ 210. $\frac{1}{211}$ 211. $\frac{1}{212}$ 212. $\frac{1}{213}$ 213. $\frac{1}{214}$ 214. $\frac{1}{215}$ 215. $\frac{1}{216}$ 216. $\frac{1}{217}$ 217. $\frac{1}{218}$ 218. $\frac{1}{219}$ 219. $\frac{1}{220}$ 220. $\frac{1}{221}$ 221. $\frac{1}{222}$ 222. $\frac{1}{223}$ 223. $\frac{1}{224}$ 224. $\frac{1}{225}$ 225. $\frac{1}{226}$ 226. $\frac{1}{227}$ 227. $\frac{1}{228}$ 228. $\frac{1}{229}$ 229. $\frac{1}{230}$ 230. $\frac{1}{231}$ 231. $\frac{1}{232}$ 232. $\frac{1}{233}$ 233. $\frac{1}{234}$ 234. $\frac{1}{235}$ 235. $\frac{1}{236}$ 236. $\frac{1}{237}$ 237. $\frac{1}{238}$ 238. $\frac{1}{239}$ 239. $\frac{1}{240}$ 240.

Plaintiff

FOIA b 7 - DOD CASE FILES

Defendant

[illegible]

COUNTRY OF THE ADDRESS

© 2004 Blackwell Publishing Ltd, *Journal of Internal Medicine* 255: 103–110

1. $\frac{1}{2}$ 2. $\frac{1}{2}$ 3. $\frac{1}{2}$ 4. $\frac{1}{2}$ 5. $\frac{1}{2}$ 6. $\frac{1}{2}$ 7. $\frac{1}{2}$ 8. $\frac{1}{2}$ 9. $\frac{1}{2}$ 10. $\frac{1}{2}$

Please see attached documents

Electronic

3/24/2024

9:00am EST

PREMISES	DATE	TIME
----------	------	------

Lauren Wolfe, Attorney for Plaintiff

2/6/2024

Lauren Wolfe, Travelers United, 2833 Alabama Ave SE, Unit 30736, Washington, D.C. 20020

Abstract

Case Number: 2022 CA 003089 B

Court Date:

PROOF OF SERVICE

Served	Date	Time	Place
--------	------	------	-------

Served on (Print Name)	Title
------------------------	-------

MANNER OF SERVICE (attach the return receipt if service was made by registered or certified mail) I served the subpoena by delivering a copy to the named person as follows:

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the District of Columbia that I am at least 18 years of age and not a party to the above entitled case and that the foregoing information contained in the Proof of Service is true and correct.

Executed on

Date

Signature of Server

Address of Server

Super. Ct. Civ. R. 45(c) and (d):

(c) PROTECTING A PERSON SUBJECT TO A SUBPOENA; ENFORCEMENT.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents, electronically stored information, or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court must quash or modify a subpoena that:

(i) fails to allow reasonable time to comply;

(ii) requires a person who is neither a party nor a party's officer to travel more than 25 miles from where that person resides, is employed, or regularly transacts business in person—except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place to the place of trial;

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information;

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or

(iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 25 miles to attend trial.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(d) DUTIES IN RESPONDING TO A SUBPOENA.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation materials must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

Summary of the Case: Travelers United, a non-profit focused on consumer protection in travel, has sued influencer Cassandra De Pecol and her LLC, Expedition 196, for allegedly (1) making the false claim that she is the first sponsored astronaut of Virgin Galactic's (2) allegedly making the false claim that she is the first woman to travel to every country and for allegedly (3) failing to disclose her material connections to brands in her many social media posts promoting brands and products. Defendants Cassandra De Pecol and her LLC, Expedition 196, deny these allegations. The case has been filed in D.C. Superior Court.

Summary of the Subpoena to Marriott International, Inc: Travelers United has sent a subpoena to Marriott International, Inc. to better understand the material connections between Marriott properties and defendant(s). Travelers United is seeking all documents related to the material connections between defendants stay at any Marriott family property (Edition, The Ritz-Carlton, The Luxury Collection, St. Regis, W Hotels, JW Marriott, Marriott, Sheraton, Marriott Vacation Clubs, Delta, Westin, Le Meridien, Renaissance Hotels, Autograph Collection Hotels, Tribute Portfolio, Design Hotels, Gaylord Hotels, Courtyard, Four Points, Springhill Suites, Fairfield, AC Hotels-Marriott, A Loft, Moxy, Protea Hotels, City Express by Marriott, Four Points Express by Sheraton, Residence Inn, Towneplace Suites, Element, Homes and Villas by Marriott Bonvoy, Apartments by Marriott Bonvoy, Marriott Executive Apartments) from 2015 to 2023.

Cassandra De Pecol also uses the name Cassie De Pecol.

Instagram: @cassiedepecol

TikTok: @cassiedepecol

Facebook: facebook.com/CassieDePecol

The first six pages of the complaint are included in this document.

Here is a link to the entire complaint: <https://www.travelersunited.org/wp-content/uploads/2022/08/CDPEx196Lawsuit-compressed-1.pdf>

Please produce the documents by March 24, 2024.

If you have any questions, please feel free to reach out to Travelers United Counsel Lauren Wolfe at lauren.wolfe@travelersunited.org

DOCUMENTS REQUESTED

The request for the production of documents is related to documents from 2017 to 2024

On April 1, 2017 and April 7, 2017 Cassandra De Pecol promoted the The Luxury Collection in an Instagram post from Sun Siyam Iru Fushi.

- Please provide all documentation about Cassandra De Pecol and her material connections between the Sun Siyam Iru Fushi
- Please provide all documentation about Cassandra De Pecol and her material connections between the Luxury Collection
- If Cassandra De Pecol received a free stay at this hotel, when did she receive that stay, how long was the stay and what was the retail value of that stay
- If Cassandra De Pecol was paid to stay at this hotel, please provide documentation about the amount that Cassandra De Pecol was paid
- Please provide documentation about De Pecol's expected posting on social media as a result of this stay

On July 28, 2018 and July 29, 2018 defendant posted Instagram photos promoting The Vail Marriott Mountain Resort.

- Please provide all documentation about Cassandra De Pecol and her material connections between The Vail Mountain Resort
- If Cassandra De Pecol received a free stay at this hotel, when did she receive that stay, how long was the stay and what was the retail value of that stay
- If Cassandra De Pecol was paid to stay at this hotel, please provide documentation about the amount that Cassandra De Pecol was paid
- Please provide documentation about De Pecol's expected posting on social media as a result of this stay

On August 7, 2018, August 8, 2018 and August 16, 2018 and August 24, 2018 Cassandra De Pecol posted on Instagram promoting the Four Seasons Denver.

- Please provide all documentation about Cassandra De Pecol and her material connections between the Four Seasons Denver
- If Cassandra De Pecol received a free stay at this hotel, when did she receive that stay, how long was the stay and what was the retail value of that stay
- If Cassandra De Pecol was paid to stay at this hotel, please provide documentation about the amount that Cassandra De Pecol was paid
- Please provide documentation about De Pecol's expected posting on social media as a result of this stay

On August 9, 2018 and August 10, 2018 Cassandra De Pecol posted on Instagram promoting the Renaissance Boulder Flatiron.

- Please provide all documentation about Cassandra De Pecol and her material connections between the Renaissance Boulder Flatiron
- If Cassandra De Pecol received a free stay at this hotel, when did she receive that stay, how long was the stay and what was the retail value of that stay
- If Cassandra De Pecol was paid to stay at this hotel, please provide documentation about the amount that Cassandra De Pecol was paid
- Please provide documentation about De Pecol's expected posting on social media as a result of this stay

On August 12, 2018 Cassandra De Pecol promoted The Art Hotel on Instagram. She posted again about the hotel on August 14, 2018.

- Please provide all documentation about Cassandra De Pecol and her material connections between the Art Hotel
- If Cassandra De Pecol received a free stay at this hotel, when did she receive that stay, how long was the stay and what was the retail value of that stay
- If Cassandra De Pecol was paid to stay at this hotel, please provide documentation about the amount that Cassandra De Pecol was paid
- Please provide documentation about De Pecol's expected posting on social media as a result of this stay

On August 3, 2018 and August 4, 2018 Cassandra De Pecol promoted on Instagram promoting the Ritz Carlton Orlando.

- Please provide all documentation about Cassandra De Pecol and her material connections between the Ritz Carlton Orlando.
- If Cassandra De Pecol received a free stay at this hotel, when did she receive that stay, how long was the stay and what was the retail value of that stay
- If Cassandra De Pecol was paid to stay at this hotel, please provide documentation about the amount that Cassandra De Pecol was paid
- Please provide documentation about De Pecol's expected posting on social media as a result of this stay

Twice on December 13, 2018 Cassandra De Pecol promoted The Ritz-Carlton Lake Tahoe on Instagram.

- Please provide all documentation about Cassandra De Pecol and her material connections between the The Ritz-Carlton Lake Tahoe.

- If Cassandra De Pecol received a free stay at this hotel, when did she receive that stay, how long was the stay and what was the retail value of that stay
- If Cassandra De Pecol was paid to stay at this hotel, please provide documentation about the amount that Cassandra De Pecol was paid
- Please provide documentation about De Pecol's expected posting on social media as a result of this stay

On September 11, 2019, September 12, 2019 and September 14, 2019 Cassandra De Pecol promoted The Ritz Carlton Bachelor Gulch on Instagram.

- Please provide all documentation about Cassandra De Pecol and her material connections between the The Ritz-Carlton Bachelor Gulch
- If Cassandra De Pecol received a free stay at this hotel, when did she receive that stay, how long was the stay and what was the retail value of that stay
- If Cassandra De Pecol was paid to stay at this hotel, please provide documentation about the amount that Cassandra De Pecol was paid
- Please provide documentation about De Pecol's expected posting on social media as a result of this stay

On October 25, 2019 Cassandra De Pecol promoted The Boulder Marriott on Instagram.

- Please provide all documentation about Cassandra De Pecol and her material connections between The Boulder Marriott
- If Cassandra De Pecol received a free stay at this hotel, when did she receive that stay, how long was the stay and what was the retail value of that stay
- If Cassandra De Pecol was paid to stay at this hotel, please provide documentation about the amount that Cassandra De Pecol was paid
- Please provide documentation about De Pecol's expected posting on social media as a result of this stay

On October 29, 2019, October 30, 2019 and November 4, 2019 Cassandra De Pecol promoted The Embassy Suites Boulder on Instagram.

- Please provide all documentation about Cassandra De Pecol and her material connections between The Embassy Suites Boulder
- If Cassandra De Pecol received a free stay at this hotel, when did she receive that stay, how long was the stay and what was the retail value of that stay
- If Cassandra De Pecol was paid to stay at this hotel, please provide documentation about the amount that Cassandra De Pecol was paid

- Please provide documentation about De Pecol's expected posting on social media as a result of this stay

On March 12, 2020 Cassandra De Pecol promoted the Delta Marriott on Instagram.

- Please provide all documentation about Cassandra De Pecol and her material connections to The Delta Marriott
- If Cassandra De Pecol received a free stay at this hotel, when did she receive that stay, how long was the stay and what was the retail value of that stay
- If Cassandra De Pecol was paid to stay at this hotel, please provide documentation about the amount that Cassandra De Pecol was paid
- Please provide documentation about De Pecol's expected posting on social media as a result of this stay

On October 14, 2021 Cassandra De Pecol posted a TikTok promoting her stay at The Ritz-Carlton.

(<https://www.tiktok.com/@cassiedepecol/video/7019050145916505349>)

- Please provide all documentation about Cassandra De Pecol and her material connections to The Ritz-Carlton
- If Cassandra De Pecol received a free stay at this hotel, when did she receive that stay, how long was the stay and what was the retail value of that stay
- If Cassandra De Pecol was paid to stay at this hotel, please provide documentation about the amount that Cassandra De Pecol was paid
- Please provide documentation about De Pecol's expected posting on social media as a result of this stay

Please provide any further documentation related to the material connections between Marriott International, Inc. and Cassandra De Pecol and/or her LLC, Expedition 196.

Dated on February 6, 2024

Respectfully submitted,

/s/ Lauren Wolfe

Lauren Wolfe

LAUREN WOLFE (D.C. Bar # 1048660)
Counsel, Travelers United
2833 Alabama Ave SE #30736
Washington, D.C. 20020

Telephone: 202-713-9596
Email: lauren.wolfe@travelersunited.org

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION

TRAVELERS UNITED)	
2833 Alabama Ave SE #30736)	
Washington, D.C. 20020,)	
)	
Plaintiff,)	
)	Civil Action No. _____
v.)	
)	
CASSANDRA DE PECOL)	
23823 Malibu Road Suite 50 – 427)	
Malibu, CA 90265)	
Defendant.)	

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.¹ 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.² De Pecol has made her Instagram account accessible to the audience of the United States of America, including the District.

¹ 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>

² 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/) 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.³ 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

³ 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 influencers⁴ in addition raising concerns about a lack of disclosures in social media influencing.⁵ 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 &

⁴ 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/>.

⁵ 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/>.

Certificate of Service

On this day of February 6, 2024, I served the foregoing on all counsel of record via eFile DC.

Respectfully submitted,

/s/ Lauren Wolfe

Lauren Wolfe

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