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**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

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**PLAINTIFF'S SUBPOENA TO VIRGIN GALACTIC  
FOR PRODUCTION OF DOCUMENTS**

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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 Plaintiff's Subpoena to Virgin Galactic: Cassandra De Pecol claims that she will be the first sponsored astronaut of Virgin Galactic's. She uses this claim in her author biography on Amazon where she sells her book, she uses this claim in her YouTube biography and she often posts about her being the first sponsored astronaut of Virgin Galactic's on Instagram and TikTok to her hundreds of thousands of followers.

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](mailto:lauren.wolfe@travelersunited.org)

## **DOCUMENTS REQUESTED**

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

Please produce all documents, emails, phone call records, etc. between Cassandra De Pecol and/or Expedition 196, LLC and Virgin Galactic

Cassandra De Pecol stated that Virgin Galactic told her over the phone that she would be the first sponsored astronaut. Produce any records or documentation of that alleged phone call.

Please produce any cease and desist letters that Virgin Galactic sent to Cassandra De Pecol and/or Expedition 196, LLC

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

Thank you for your help in this matter.

Dated on February 6, 2024

Respectfully submitted,

/s/ Lauren Wolfe

Lauren Wolfe

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IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION

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

AND

<b>EXPEDITION 196, LLC</b>	)
23823 Malibu Road Suite 50 – 427	)
Malibu, CA 90265	)
Defendant.	)

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**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/>.

### **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