

**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.

**KRISTI NOEM**  
119 N Washington Ave  
Pierre, SD 57501,

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 Kristi Noem 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. For many years Kristi Noem has run personal social media accounts. On March 12, 2024 she advertised a product or service without disclosing that she has a financial relationship with that company. She did not let her followers know when he is advertising on behalf of a brand. Travelers United is

taking action to force her to make corrective disclosures on all social media posts where she promotes products or services.

2. Kristi Noem is the Governor of South Dakota and an Instagram, Facebook, Truth Social and X (formerly Twitter) influencer. 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 three 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. The third is through Instagram reels which are a short video, similar to TikTok. Governor Noem has, as of March 12, 2024, 250,000 Instagram followers on her Instagram handle @kristinoem. *The Wall Street Journal's* data from Mediakix points out that with this many followers she could easily earn \$2,000 or more per Instagram post.<sup>1</sup>
3. Kristi Noem is also active on social media on platforms other than Instagram. She has a very active X account (formerly Twitter) where she has 485,500 followers.
4. Kristi Noem is also active on the social media platform Truth Social where she has 969,000 followers.
5. Kristi Noem is also active on Facebook. Noem has 273,000 Facebook followers.
6. Kristi Noem conducts her social media influencing business from South Dakota where she is currently serving as governor.

---

<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>

7. 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 Kristi Noem, have the option on turning off a specific country's viewership.<sup>2</sup> Noem has made her Instagram account accessible to the audience of the United States of America, including the District. Noem's X (formerly Twitter), Facebook and Truth Social account are also viewable from Washington, D.C.
8. 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. Kristi Noem selected to make her Instagram account public.
9. Governor Kristi Noem is the Governor of South Dakota for a living but seems to have taken up work as a social media influencer as of March 12, 2024. It is not uncommon for social media influencers to work part-time as influencers while holding another job.
10. Companies, like Smile Texas, pay influencers, like Kristi Noem, to promote their product or service to her followers. The social media account for Smile Texas and the doctors of Smile Texas with public social media profiles are all viewable from the District.
11. District residents can, like Kristi Noem, fly to Texas to receive treatment from Smile Dental. Encouraging medical tourism is the point of the undisclosed advertisement. Smile Dental has a page devoted to travel information on their website (<https://www.smiletexas.com/travel/>).

---

<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/>

12. Kristi Noem's X, Truth Social, Facebook, Instagram and other social media accounts are used to advertise, market and sell goods and/or services to residents of the District of Columbia.

### **JURISDICTION**

13. This Court has jurisdiction over the subject matter of this case pursuant to D.C. Code § 11-921 and D.C. Code § 28-3905.

14. This Court has personal jurisdiction over the Defendant pursuant to D.C. Code § 13-423(a).

### **PARTIES**

15. 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 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>3</sup> in addition raising concerns about a lack of disclosures in social media influencing.<sup>4</sup> Travelers United filed a case of first impression regarding false claims and

---

<sup>3</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>4</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/>.



lack of advertising disclosures regarding travel social media influencing in the District's Superior Court.<sup>5</sup> Travelers United, based in Washington, D.C. has members who reside in Washington, D.C.

16. Defendant Kristi Noem is a resident of South Dakota where she currently serves as governor of the state. Sitting politicians do not typically work as part-time social media influencers.
17. Defendant Kristi Noem traveled from her home in South Dakota to Texas, the home of Smile Texas, for a medical procedure. In her undisclosed advertisement she talks about travel as an essential part of her visit to Smile Texas.
18. As a social media influencer and politician Kristi Noem is herself a brand and she is promoting a service that benefits her – both physically (a new smile) and financially (she was either paid or received free or reduced cost medical services in exchange for the advertisement). The influencer is the brand has already been successfully argued by Travelers United before in *Travelers United v. Expedition 196, et. al.* Here Smile Texas paid and/or gave free services to the merchant, the influencer Noem, to promote its product to District residents.
19. Medical tourism – traveling from South Dakota to Texas for a dental procedure - is a form of travel. Smile Texas promotes medical tourism on their website. On Smile Texas' website they have a travel page devoted to information for consumers who would travel to Texas for their services (<https://www.smiletexas.com/travel/>). The mission of Travelers United is to improve and enhance travel for consumers across all modes of

---

<sup>5</sup> Taylor Lorenz, *Does traveling to every country count if you don't post on the Internet?*, THE WASHINGTON POST, (last visited March 12, 2024) <https://www.washingtonpost.com/technology/2022/04/13/travel-influencer-lawsuit-cassie-de-pocol/>

travel and that includes consumers interested in medical tourism and those who are watching advertisements about medical tourism.

20. Kristi Noem has, at all relevant times, engaged in trade or commerce in the District by advertising through her X, Truth Social, Facebook, Instagram and other social media platforms, to District consumers.

**KRISTI NOEM’S DECEPTIVE ADVERTISING PRACTICES**  
**Defendant’s Practice of Misleading and Deceptive Advertising**

21. This action was commenced after Kristi Noem posted an undisclosed advertisement for Smile Texas on her personal social media accounts. Influencers are defined by the American Bar Association as “any person with credibility who can influence the opinions or purchase decisions of others.”<sup>6</sup> When asked to describe an influencer in the HBO Documentary *Fake Famous*, Taylor Lorenz, a reporter of internet culture, described them as “somebody who is half entrepreneur and half celebrity.” Hana Hussein, a social media manager, described an influencer in the documentary as “anyone who has access to a large following whether it is real or fake and they are able to promote themselves or brands.”<sup>7</sup>

22. The higher someone’s follower count is on social media, the more that social media star can charge to “influence” their followers. Influencing is big business. The *Harvard Business Review* reported that “in 2018, 19% of all U.S. consumers – including 36% of

---

<sup>6</sup> Mark Goodrich and Jason Howell, *Influencers: What Every Brand and Legal Counsel Should Know*, THE AMERICAN BAR ASSOCIATION, (last visited May 1, 2021) [https://www.americanbar.org/groups/intellectual\\_property\\_law/publications/landslide/2018-19/september-october/influencers/](https://www.americanbar.org/groups/intellectual_property_law/publications/landslide/2018-19/september-october/influencers/).

<sup>7</sup> FAKE FAMOUS (Nick Bilton, 2021)

those aged under 25 – purchased a product or a service because a social media influencer recommended it.”<sup>8</sup> On the *Under the Influence* podcast by Jo Piazza, she reports that “brands are going to bring in more than 10 billion dollars from Instagram this year, 15 billion by 2022. It’s a multi-billion dollar industry.”<sup>9</sup>

23. The goal of influencing on Instagram, and other social media platforms, is to get as many followers and as much engagement (people liking and commenting on posts, people watching their Instagram stories) as possible. That shows to a brand that a certain influencer has a loyal and engaged following who will listen to what products said influencer recommends. Companies pay influencers big money to advertise on behalf of their brands. Kim Kardashian has reported earning up to one million dollars per Instagram post<sup>10</sup> while her sister Kylie Jenner is reportedly earning 1.2 million dollars per Instagram post. Cristiano Ronaldo, the soccer star who happens to be the most followed person on Instagram, commands \$975,000 per Instagram post.<sup>11</sup> Very large sums of money are paid by brands to influencers to have them promote products on Instagram and other forms of social media. “Lives that can be monetized”<sup>12</sup> summarizes Jo Piazza on

---

<sup>8</sup> Alice Audrezet and Karine Charry, *Do Influencers Need To Tell Audiences They’re Getting Paid*, HARVARD BUSINESS REVIEW, August 29, 2019, <https://hbr.org/2019/08/do-influencers-need-to-tell-audiences-theyre-getting-paid>

<sup>9</sup> Jo Piazza, *A More Perfect Mother*, UNDER THE INFLUENCE PODCAST, (February 4, 2021) <https://open.spotify.com/episode/67Rtv0Hfcq0pm7KCFcKMnU>.

<sup>10</sup> Alicia Brunker, *Kim Kardashian Says She Makes More Money on Instagram Than for an Entire Season of KUWTK*, IN STYLE, October 18, 2020, <https://www.instyle.com/celebrity/kim-kardashian-makes-more-money-on-instagram-than-kuwtk>

<sup>11</sup> BBC, *How much does Kylie Jenner earn on Instagram?* WWW.BBC.CO.UK, (July 26, 2019) <https://www.bbc.co.uk/newsround/49124484>.

<sup>12</sup> Jo Piazza, *A More Perfect Mother*, UNDER THE INFLUENCE PODCAST, (February 4, 2021) <https://open.spotify.com/episode/67Rtv0Hfcq0pm7KCFcKMnU>.

her podcast *Under the Influence*. Jo Piazza reports that there is a by post baseline for how much influencers get paid per post and that is “\$100 per 10,000 followers.”<sup>13</sup>

24. Kristi Noem posted an undisclosed advertisement for Smile Texas on March 12, 2024 on her social media accounts. The following video was placed on Kristi Noem’s Facebook, X, Truth Social, Instagram page, Instagram Stories and Instagram reels. The caption “I love my new family at Smile Texas! The video says it all, and I am so grateful for their help fixing my smile for me.” The text is followed by a smile emoji, a hands up emoji and another smile emoji. There is no disclosure that this is an advertisement or that she received any free or discounted medical procedures in exchange for this social media advertisement.

25. The text of the undisclosed Smile Dental advertisement that Kristi Noem reads is:

“Well, Hi, I’m Kristi Noem. I’m the Governor of South Dakota and had the opportunity to come to Smile Texas to fix my teeth which has been absolutely amazing. For years I have needed to have an adjustment to my teeth from a biking accident. And they have been absolutely phenomenal. Years ago I was out bike riding with all of my kids when they were little and had a biking accident and knocked out all of my front teeth. And so several years ago I did a consultation here at Smile Texas and did it here by Zoom but could never quite find the time um and recently got the chance to work with Dr. Davis, Dr. Dooley has always been fantastic to me too, but the team here was remarkable and finally gave me a smile that I can be proud of and confident in and that really is a gift that I think is going to be incredibly special to have. You know I think that I chose the team here at Smile Texas because they are the best, first of all, I studied a lot of the work that they had done and talked to a lot of people that had been here but also because they were so kind. They wanted to make sure that I was happy with my smile. Not only that the bite was correct and that I liked the shape, the color, but that it was going to work for me for the rest of my life and it was something that I could be proud of so for them, they care about people and that they are happy more than they are fixing something to get by. They want it to be perfect and for me, if you are going to go through a process like this, that means a lot to have someone that cares that much about the work that they do. Well for me, I realize that the job that I am in, I spent my whole life farming and ranching, riding horses, chasing cows and then got into government and politics where everything is

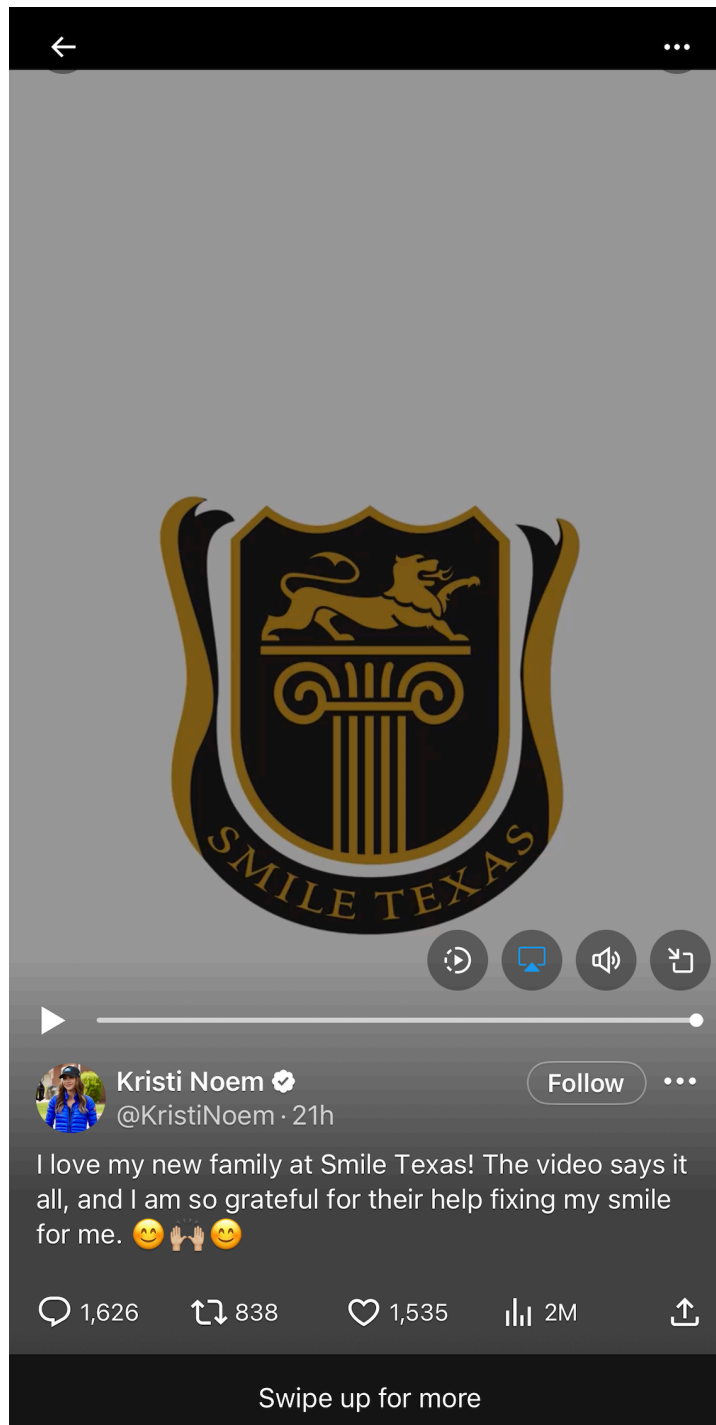
---

<sup>13</sup> Jo Piazza, *A More Perfect Mother*, UNDER THE INFLUENCE PODCAST, (February 4, 2021) <https://open.spotify.com/episode/67Rtv0Hfcq0pm7KCFcKMnU>.

speaking and interviews and giving speeches. I want when people look at me to hear the words that I say and not be distracted by something I am wearing or how I look or even my appearance. I want them to focus on my thoughts and ideas and what we can do to make this country better. For me being able to have a confident smile and be my teeth be something that is not a distraction but actually is appealing to people will be helpful because I think that it will make sure that we are focused on really the right points that I want to make and make sure that that confidence shines through. I love it. I love that my bite is better. That my teeth are a better shape. That they feel better in my mouth and that I can be confident when I smile at people and know that they can actually appreciate and see the kindness in my face and the love that I have for them. Also my schedule is kind of crazy and very busy. I remember I got a phone call from Jenell that said that we can actually do this if you are willing to fly in. My husband and I flew down to Houston. Got here at 2 o'clock in the morning and did an appointment that very next week. Then they quickly got the teeth constructed and back and I came back just seven days later and had the final install done and the work completed. It was amazing to me how flexible this team was with my schedule and they are that way with everyone. Made it work with me and my team so that we could make sure that the entire process was done not rushed. But that I also was able to get back on the road and back home to South Dakota as quick as possible. When they first showed me with a mirror my new teeth I started to cry. I think it's because I had an uncle that's an orthodontist. He did braces on all of his nieces and nephews. Everyone. Except for me. And I remember being a little girl and having him say your teeth just aren't bad enough. Even from that time I knew my teeth were not perfect. That they were okay but they were not bad enough to fix. It's just been something that I've always thought and hoped that someday I could address it and have a confident smile. When they showed me my beautiful new teeth I hugged Dr. Davis and thanked him and started to cry because he really does care about the work that he does. To make sure that it's perfect and it means a lot to me that something as small as your smile really can change the world. Peoples first impressions of you are important. I want people to know how much I enjoy seeing them and how much I love being with people. And the fact that he gave me the smile to do that now. I will be eternally grateful. It has been a gift to be here at Smile Texas."

The video finishes with an image of a logo for Smile Texas.

26. The undisclosed advertisement posted by Governor Kristi Noem for Smile Texas ends with a Smile Texas logo. A screenshot of the end of the advertisement is below:




The final image on Kristi Noem's undisclosed Smile Texas advertisement

27. The following is a screenshot of the undisclosed advertisement for Smile Texas on Kristi Noem's Facebook account.

 **Kristi Noem**  21h · 

I love my new family at Smile Texas! The video says it all, and I am so grateful for their help fixing my smile for me. 😊🙌😊



  467

222 comments 31 shares

28. The following is a screenshot of the undisclosed advertisement for Smile Texas on Kristi Noem's Truth Social account.

**TRUTH.**

Email or username

P



Home

Discover

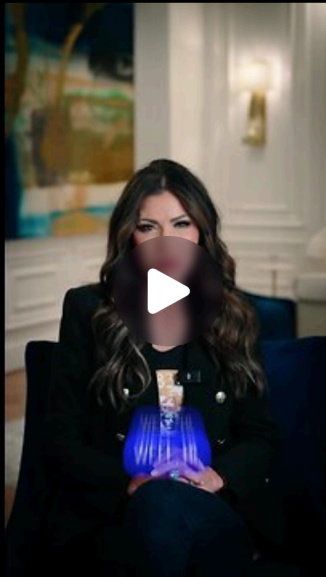
**Truth Details**

63 replies

Trending

**Kristi Noem**   
@KristiNoem

I love my new family at Smile Texas! The video says it all, and I am so grateful for their help fixing my smile for me. 🥰🙌🥰



04:50

138 ReTruths 960 Likes

Mar 11, 2024, 11:41 PM

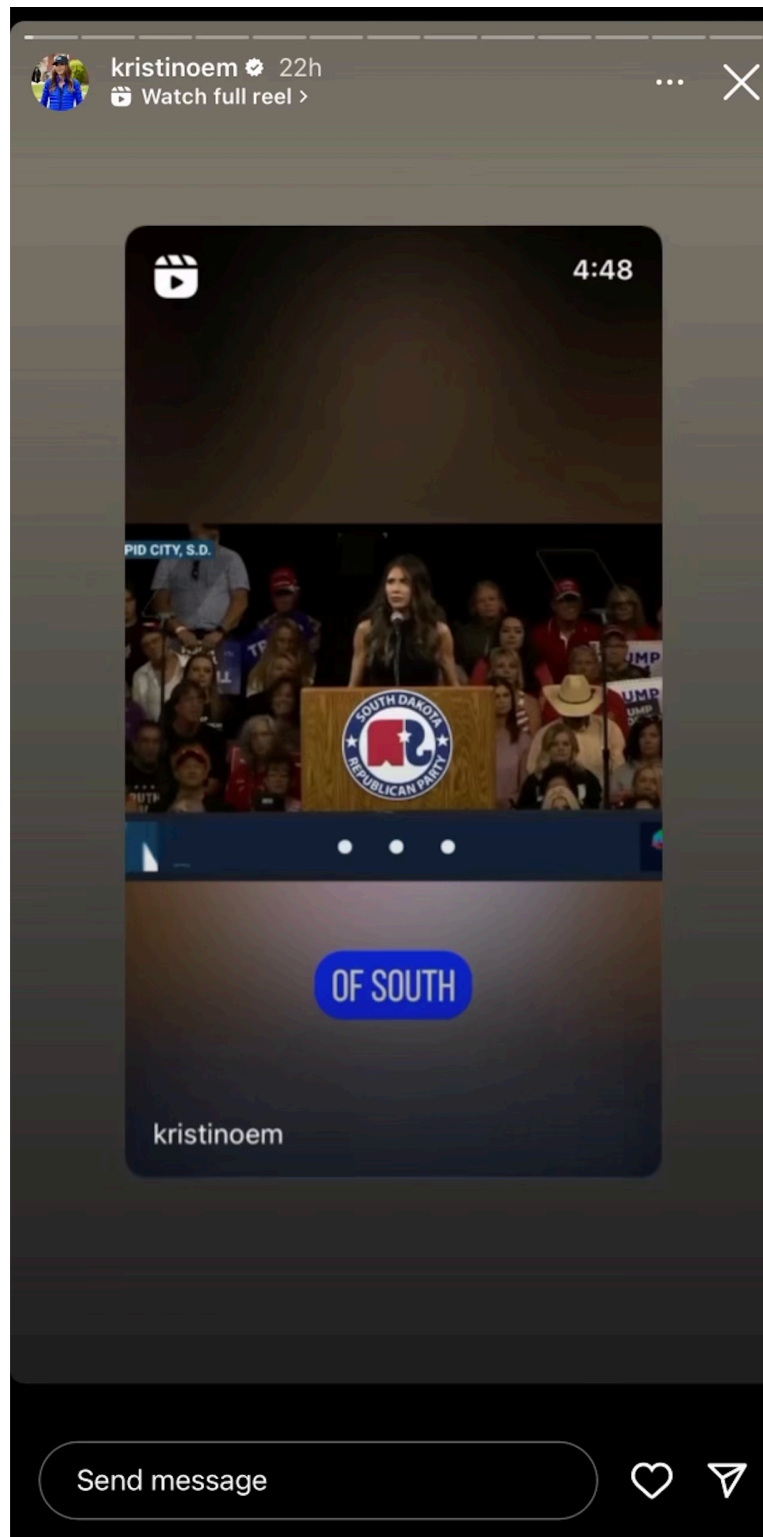
Reply

ReTruth

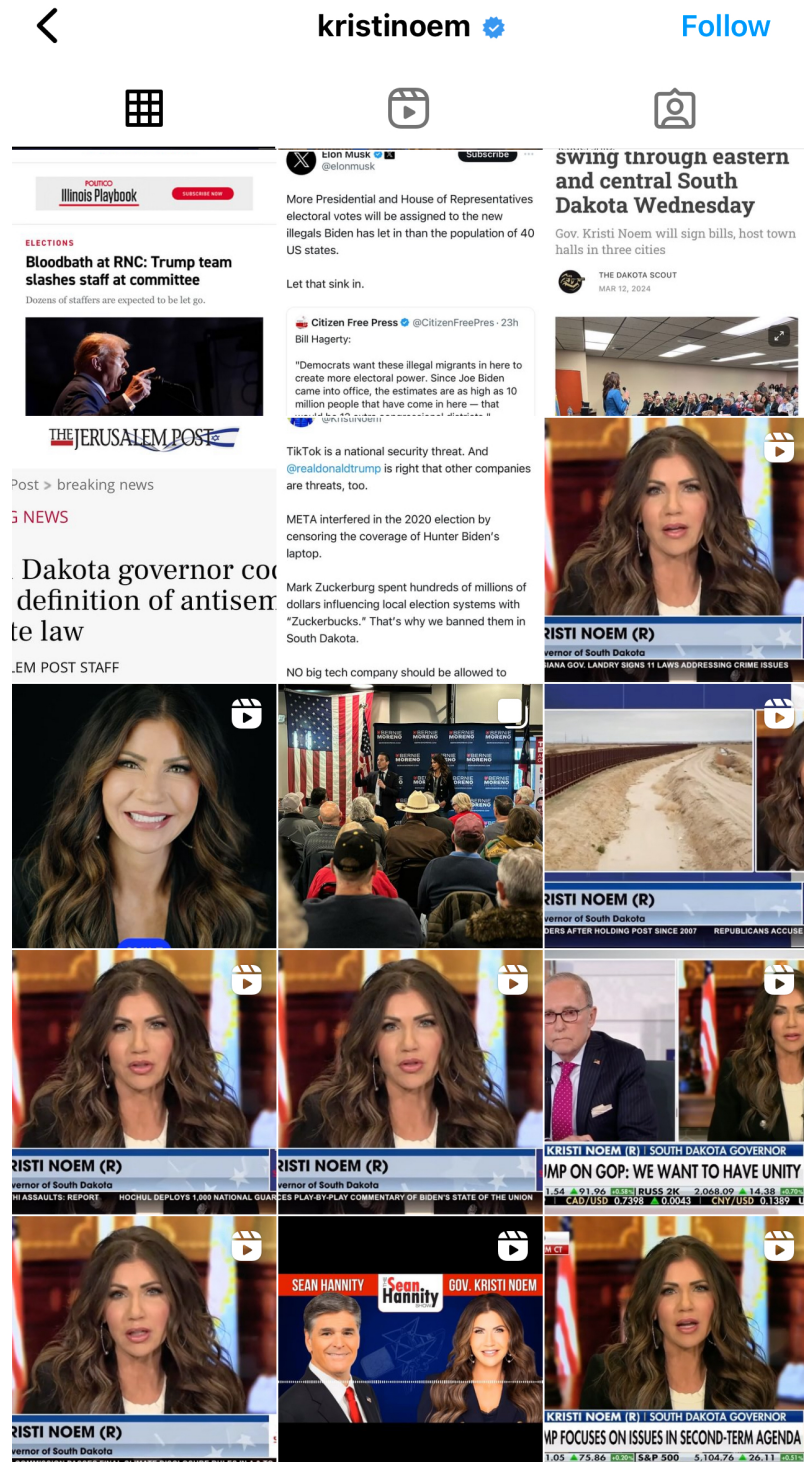
Like



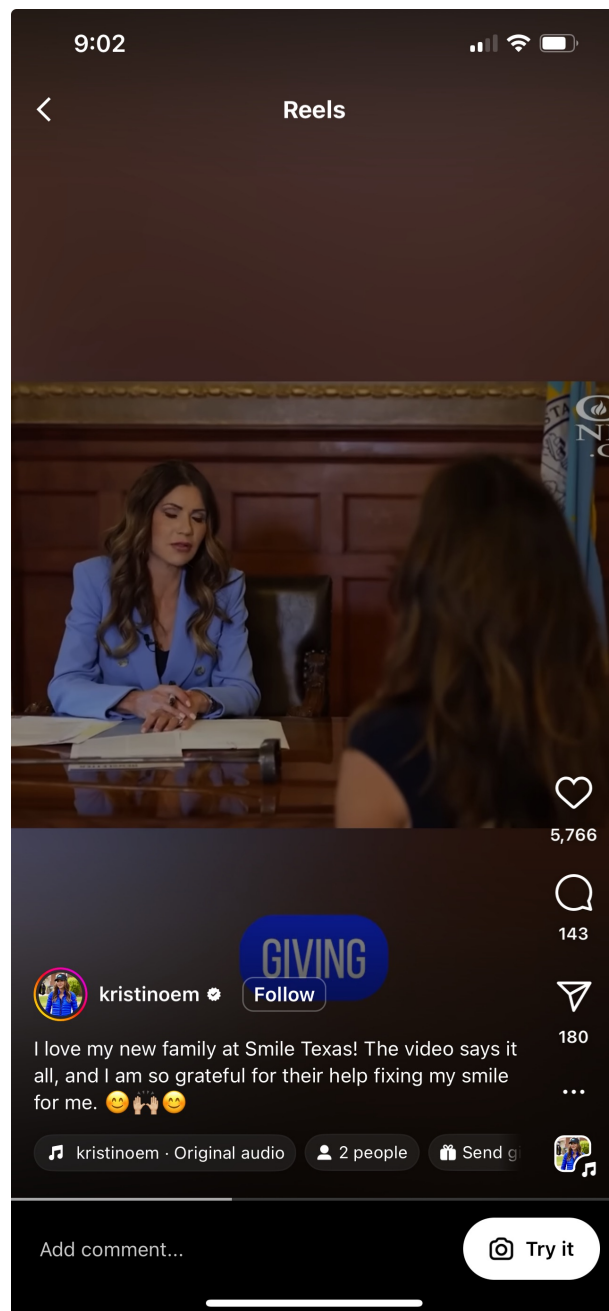
29. The following is a screenshot of the undisclosed advertisement for Smile Texas on Kristi Noem's Instagram stories.



30. The following is a screenshot of the undisclosed advertisement for Smile Texas on Kristi Noem's Instagram page.



31. The following is a screenshot of the undisclosed advertisement for Smile Texas on Kristi Noem's Instagram reels.



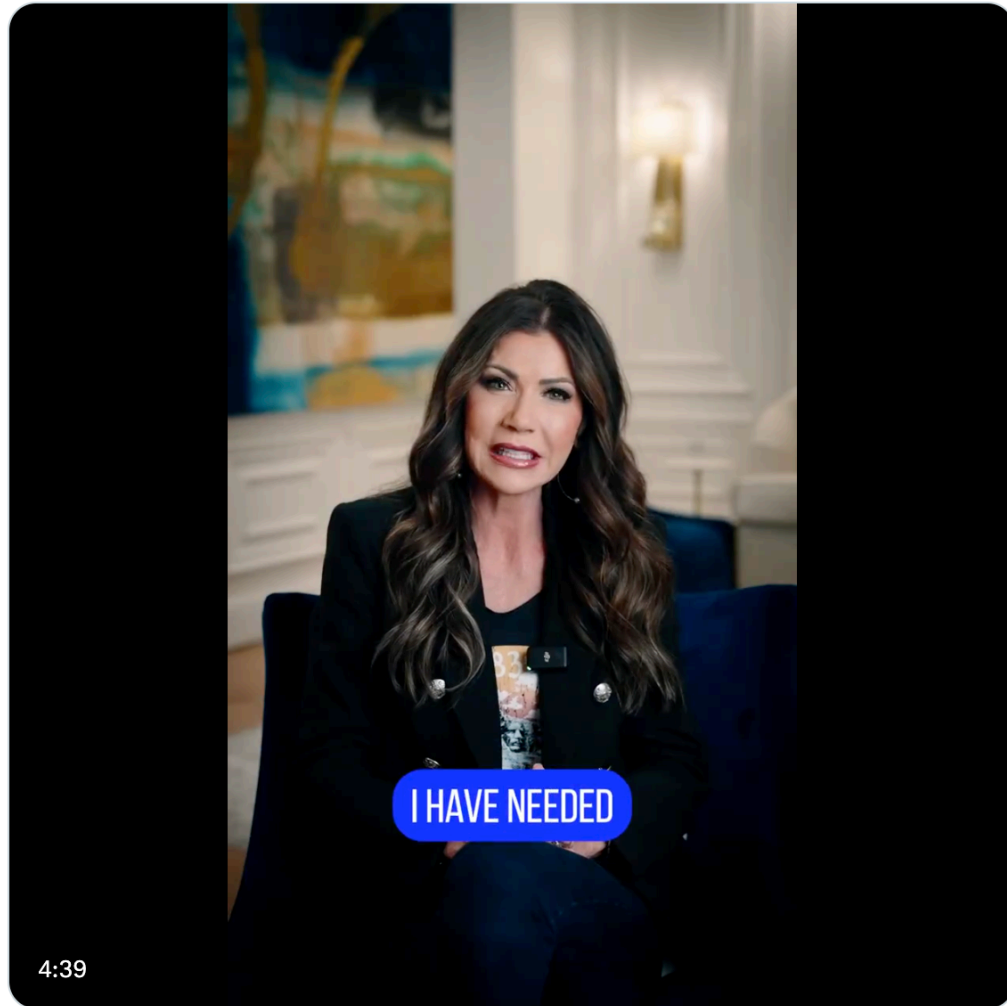
32. The following is a screenshot of the undisclosed advertisement for Smile Texas on Kristi Noem's X account.



**Kristi Noem** ✓  
@KristiNoem



I love my new family at Smile Texas! The video says it all, and I am so grateful for their help fixing my smile for me. 😊🙌😊



11:30 PM · Mar 11, 2024 · 2M Views

💬 1.6K

↻ 841

❤️ 1.5K

🔖 203



33. The background of the undisclosed advertisement is clearly that of Smile Texas. It seems that Governor Kristi Noem filmed this advertisement at Smile Texas. They likely professionally produced the advertisement. Smile Texas regularly works with influencers

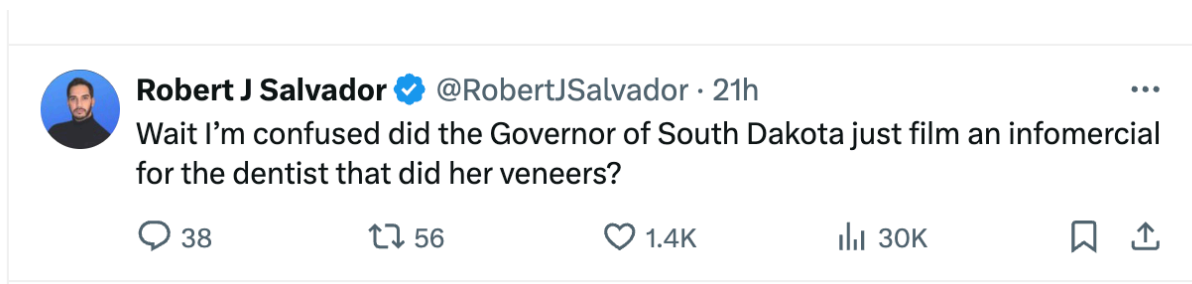
in promoting their products and services. Travelers United was unable to find any proper disclosure of influencer advertising on Smile Texas' social media accounts. The Kristi Noem Smile Texas advertisement was also placed on Smile Texas' social media accounts. Smile Texas promotes their services as medical tourism. On their own social media page and on their own website (<https://www.smiletexas.com/travel/>), they list hotels consumers can stay at while they get work done at Smile Texas.



Above is an Instagram story of someone showing off the interior of Smile Texas. This is the same background as the Governor Kristi Noem Smile Texas advertisement.



34. Someone with a very busy job does not take time off of that job to make a free advertisement for medical services in another state. There are many dentists and cosmetic dentists in South Dakota. No one with an extremely important job in the South Dakota would fly to Texas to receive dental treatment and then sit in that office and film an advertisement without some form of compensation. Kristi Noem acted here as an influencer. She likely either received free dental care in exchange for this advertisement, discounted dental care in exchange for this advertisement or she was paid and received free dental care for the advertisement. Unfortunately Noem did not mark this as an “Ad” or “Advertisement” when posting so she is participating in an unfair and deceptive practice.
35. Consumers of social media and followers of Kristi Noem replied with comments that questioned what was going on with this undisclosed advertisement. The social media commentary seems focused on the confusion of why an influencer, here Governor Kristi Noem, would be able to post an advertisement on social media without the necessary Federal Trade Commission requirement of disclosing that the post is an advertisement by writing Ad, Advertisement or Sponsored. The following comments were posted on X (formerly Twitter):



 **Brian Stephens**  @brianstephens00 · 10h ...

You're legally required to add the [#ad](#)

   2  305  

 **Ashley St. Clair**  @stclairashley · 7h ...



Kristi Noem: the dental care in the state I run is so piss poor that I did a brand deal for one in Texas

 12  5  99  4.7K  







 **Stephen Horn**  @stephenehorn · 10h ...



How much did you get paid for this ad?

 1   12  700  







 **Kenny Howard**  @God\_winsforever · 13h ...

Why is a sitting governor doing an influencer ad for a dental office?

  5  48  1.5K  

 **Yaakov Strasberg**  @YaakovStras · 17h ...

Why on earth is the governor of South Dakota advertising for the company that put in her veneers and is based in Texas?!

  1  37  1.5K  



- **Underground**    @shannon4t76 · 7h ...

A governor should never be doing ads for a company.

   3  145  
- **BowTiedRad**  @BowTiedRad · 13h ...

I'm to the right of Ben Shapiro but gotta call out my side when they deserve it. This is strange

 1   10  649  
- **Beka**  @beka45458 · 1h ...

My goodness... an influencer. Smh

    55  
- **Yasmine Mary, ARNP-FNP-C**  @yazzy1967 · 15h ...

What fresh hell is this? Are you advertising?

 1  3  76  2.6K  
- **Tai M**  @TaaifMehadi · 10h ...

Nice AD

   1  289  
- **Jimmy McCambridge**  @JimmyMack0320 · 20h ...

It's not a gift if you have to promote them to pay for it.

 2   3  170  



36. Governor Kristi Noem is a smart woman who knew that laws apply to advertising disclosure on social media. Even if she wanted to say she did not know that laws applied to ads on social media, this was clearly pointed out to her after she posted. Many consumers in the comments pointed out that she should have written “Ad” or “Advertisement” to be legally compliant but she never fixed any of her posts promoting Smile Texas. Travelers United would like to make clear this lawsuit is merely a lawsuit over the lack of advertising disclosure. Governor Kristi Noem has had many accomplishments in office and Travelers United hopes that after correcting her social media posts she continues to do her job of making her great state even better.

**CAUSE OF ACTION**  
**(Violations of the District of Columbia Consumer Protection Procedures Act)**

37. The allegations of paragraphs 1 through 36 are re-alleged as if fully set forth here.
38. The CPPA is a remedial statute that is to be broadly construed. It establishes an enforceable right to truthful information from merchants about consumer goods and services that are or would be purchased, leased, or received in the District of Columbia §28-3901(c).
39. Travelers United has standing to bring this Count under §28-3905(k)(1)(D)(i) “Subject to sub-paragraph (ii) of this subparagraph, a public interest organization may, on behalf of the interests of a consumer or a class of consumers, bring an action seeking relief from the use by any person of a trade practice in violation of a law of the District if the consumer or class could bring an action under subparagraph (A) of this paragraph for relief from such use by such person of such practice.” Travelers United is a public interest organization, with members in the District, that has done significant advocacy work against deceptive advertising across the travel industry, both locally in DC and on the federal level. Deceptive and misleading social media advertising is a trade practice in violation of a law of the District.
40. The District’s Consumer Protection Procedures Act §28-3901(d) states “in construing the term ‘unfair or deceptive practice’ due consideration and weight shall be given to the interpretation by the Federal Trade Commission and the federal courts of the term “unfair or deceptive act or practice,” as employed in section 5(a) of An Act to create a Federal Trade Commission, to define its powers and duties, and for other purposes, approved September 26, 1914 (38 Stat. 719; 15 U.S.C. § 45(a)).” The Federal Trade Commission

(FTC) has long had guides concerning the use of endorsements and testimonials in advertising.<sup>14</sup> The Federal Trade Commission’s 2019 “Disclosures 101 for Social Media Influencers” clearly states that “simple and clear language” should be used such as “advertisement,” “ad” and “sponsored” to disclose when a social media post is an advertisement.<sup>15</sup>

41. Kristi Noem’s claims related to her undisclosed advertisement for cosmetic dental work out of state is a misrepresentation of material fact which has a tendency to mislead §28-3904(e) and fail to state a material fact if such failure tends to mislead §28-3904(f) when she advertises products and services online through her social media channels without disclosing she received money to show those products.
42. Kristi Noem knew and should have known that reasonable consumers she was advertising to without disclosure may believe she just liked a certain product and may purchase that product accordingly, without realizing that she was being paid to promote a product. Consumers were deceived by the lack of disclosure.

### **Prayer for Relief**

WHEREFORE, Travelers United respectfully requests this Court enter a judgment in its favor and grant relief against Defendant, as follows:

- (a) Permanently enjoin and restrain Defendant, pursuant to D.C. Code § 28-3905(k)(2)(D), from engaging in conduct determined to be in violation of the CPPA;

---

<sup>14</sup> FEDERAL TRADE COMMISSION 16 CFR Part 255 Guides Concerning the Use of Endorsements and Testimonials in Advertising, (last visited March 12, 2024) <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-publishes-final-guides-governing-endorsements-testimonials/091005revisedendorsementguides.pdf>

<sup>15</sup> Disclosures 101 for Social Media Influencers – The Federal Trade Commission (last visited March 12, 2024) [https://www.bulkorder.ftc.gov/sites/bulkorder.ftc.gov/files/publications/1001a\\_influencer\\_guide\\_508.pdf](https://www.bulkorder.ftc.gov/sites/bulkorder.ftc.gov/files/publications/1001a_influencer_guide_508.pdf)

- (b) Permanently enjoin Defendant from advertising on social media without disclosing that she is advertising;
- (c) Order the Defendant to pay statutory damages to Travelers United pursuant to D.C. Code § 28-3905(k)(2)(A), for each and every violation of the CPPA proven at trial;
- (d) Order the Defendant to pay punitive damages in an amount to be determined at trial, pursuant to D.C. Code § 28-3905(k)(2)(C);
- (e) Award Travelers United the costs and reasonable attorneys' and expert fees for its investigation and this action, pursuant to D.C. Code § 28-3905(k)(2)(B); and
- (f) Grant such further relief as the Court deems just and proper.

**Jury Demand**

Travelers United demands a trial by jury.

Respectfully submitted,

Dated: March 13, 2024

/s/ 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