

**OFFICE OF DASH AND ASSOCIATES**

ONE LIBERTY PLAZA  
165 BROADWAY  
23<sup>RD</sup> FLOOR  
NEW YORK CITY, NEW YORK, 10006

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TELEPHONE: (877) 709-1472

FACSIMILE: (888) 994-9958

**CONFIDENTIAL AND PRIVILEGED**

**To:** [REDACTED]  
**From:** Maria Palacios, Esq.  
**Re:** Cease and Desist  
**Date:** July 11, 2023  
**Comments:** See Enclosed.

The enclosed contains privileged and confidential information intended only for the use of the addressee named above. If you are not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination or copy of this letter is strictly prohibited. If you have received this in error, please notify us immediately via email and return the original copies to us at the above address via U.S. Mail. Thank you.

DANIEL SWEENEY, ESQ.  
Under contract

CHRISTOPHER RAY, ESQ.  
MA & NH  
Under contract

DAVID GOULD, ESQ.  
Under contract

AMBER BARGER, ESQ.  
Under contract

AL MARMERO, ESQ.  
Under contract

REBECCA LARSON, ESQ.  
Under contract

LUIGI CINIGLIO, ESQ.  
Under contract

MARIA PALACIOS, ESQ.  
not admitted to New York bar  
Under contract

ANTHONY CAMPBELL, ESQ.  
not admitted to New York bar  
Under contract

FILE NUMBER:  
0001883-MP

THE OFFICE OF  
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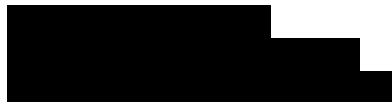
SETTLEMENTS CONTACT  
SETTLEMENTS@DASHATONELIBERTY.COM  
ADMINISTRATION AND SETTLEMENTS

**DASH & ASSOCIATES**  
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165 BROADWAY  
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NEW YORK CITY, NY, 10006

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[www.dashatoneliberty.com](http://www.dashatoneliberty.com)

July 11, 2023

Via Certified Mail - Signature Required



**Re: Yourpath for Adult Learners  
Cease and Desist; Intent to Sue**

Dear Ms. [REDACTED]:

Our office has been retained by the above-referenced business, Yourpath for Adult Learners, in connection with defamation claims against you.

It is our understanding that you were formerly enrolled in an online education course with our Client and that you were formally terminated on or about June 21, 2023, for unacceptable conduct.

In retaliation of being terminated, you posted a negative and disparaging review on google, causing undue damage to our Client's reputation.

Be advised that your enrollment contract specifically states, in relevant part: "I understand that I am prohibited from writing reviews about the program unless authorized in writing by YOURpath." Your post is clearly a violation of the contract and you shall be liable for any damages caused by a breach of same.

Consider this letter a last pursuit attempt demanding that you remove the google review within 48 hours of receiving this letter and that you cease and desist from spreading false and damaging statements against our Client. No further payments are

due from you concerning the program, given that you comply with this letter and separate amicably.

Please note that this letter constitutes a notice of intent to sue and any and all documents, including electronically stored communications, relating to my client and any potential claims my client may have, should be preserved to every extent possible.

Very truly yours,



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MARIA PALACIOS, ESQ.

Maria.palacios@dashatoneliberty.com

(877) 709-1472 ext. 1511

UNDER CONTRACT

CC: *Yourpath for Adult Learners*