
William H. Pandos Lawsuit Conduct

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Hello Lavery, Selvaggi & Cohen staff. I'm emailing you today for an important reason. I bought a certified pre owned car from Johnson Cadillac and was scammed during the process. Being the type of person I am, not liking getting scammed by somebody, wanting to help others not get caught in the same scam and not being scared to do something; I made a 100% truthful website called BADCADILLAC.COM detailing my experience with them. This website, although truthful, puts Johnson Cadillac in a VERY uncomfortable spotlight and that's where your law firm came in.

Mr. Johnson spoke with William H. Pandos about handling this and obviously after Mr. Pandos "fully investigated" all Mr. Johnson's claims, "explored every possible defense" with Mr. Johnson, "developed a tailored strategy" with Mr. Johnson and "provided an unbiased assessment of the risks and rewards" to Mr. Johnson; they came to the conclusion it was a good idea to send me a cease and desist letter on 8/8/25 COMMANDING me to stop all unlawful conduct, telling me to remove OFFENDING CONTENT from the website and threatening a lawsuit in state court in 48 hours if I didn't comply.

In that first cease and desist letter he says I "present a fabricated tale" of my interactions with Johnson Cadillac, that I "falsely framed them" and made "false statements", so in other words calling me a liar and threatening me with a lawsuit in state court if I don't comply with his demands. I didn't take the website down because I wasn't lying, but 48 hours came and went with NOTHING from Mr.

Pandos. It took 17 days but on 8/25/25 Mr. Pandos filed a VERIFIED complaint in Warren County Superior Court while on the same day filing an Order to Show Cause thereby invoking the courts jurisdiction AND emergency processes. The Verified Complaint clearly stated Pandos was the designated TRIAL attorney, that he Demanded a JURY TRIAL, certified NO other arbitration was contemplated and told the court that the case was PROPERLY LAID in Warren County State Court. Doesn't get more specific than that about who the person is, where they want to be and what the path going forward they want is.

On 8/27/25 the judge denied Mr. Pandos Order and told him the matter was "to proceed in normal course". Instead of proceeding in "normal course" and serving me the lawsuit, Mr. Pandos made another attempt at scaring me with a second cease and desist letter concerning BADCADILLAC.COM, its related content and continued threats of court action.

On 9/2/25, after not flinching, I was finally served and although, not being an attorney, I figured out how to answer the complaint. Knowing that the website is all completely true and that Johnson Cadillac was guilty of what I said there; I also figured out how to file counterclaims as well. I immediately sent out safe harbor notices to Mr. Pandos knowing the lawsuit against me was frivolous but was ignored. I also sent out discovery as well to Mr. Pandos to prove my case but was ignored there too.

Mr. Pando's actions were obviously a scare tactic that didn't work and so on 10/8/25 Mr. Pandos filed a motion to dismiss my complaint and NOW compel arbitration. The judge ruled in my favor to keep the case in state court and identified 7 Cole factors to justify this, stating the obvious that Mr. Pandos waived his right to arbitration already. That was pretty clear from his actions so far and what he actually stated in his VERIFIED complaint.

Knowing that I wasn't lying and the fact that Mr. Pando's lawsuit against me was baseless and a scare tactic; I filed a lawsuit against him and the law firm. If Mr. Pandos wasn't already scared and overwhelmed after the failed attempts to scare ME and getting exposed then he was TERRIFIED now! He not only had to

rely on Mr. Moscagiuri handling some of his filings but he made claims I “stalked” him to discover where he worked when its written on his website bio he works at the college; he claimed I “weaponized” this information when all I did was tell the truth; he claimed I “falsely” accused him of misconduct when the matter speaks clearly for itself and believe it or not he brought in an unrelated domestic violence case he was a victim of and claimed that I have “terrorized (him in) similar ways”, that this conduct has caused him to “suffer severe anxiety”, “emotional distress” and claims to be “RETRAUMATIZED”. I’d never heard of Mr. Pandos prior to HIM coming after ME with a summons and lawsuit stating he wanted to punish me “to the fullest extent of the law”, telling me my “money, wages and property could be seized” and telling me he wanted to fight this out in STATE COURT. The fact that I’m NOT a lawyer, had to figure out how to answer this on my own and I’m not crying about anxiety, emotional distress or being traumatized, begs to ask the question; Why is Mr. Pandos REALLY RETRAUMATIZED?

The judge dismissed my complaint against Pandos and his law firm though because everything derived from actions in the Johnson case, etc., etc. but having Pandos make all these statements was quite telling.

With the Johnson case though, Mr. Pandos was definitely nervous being as now his clients might actually get held accountable and so he filed an appeal immediately and unfortunately almost 8 months later since I was first served, the appellate court ruled it was JUST to send the case to an arbitrator and if the arbitrator wants then they can send the case back to state court. What a waste of time this is; But If what I wrote was so “defaming”, caused “interference of business relations”, “caused the loss of business gains” and “caused actual monetary and reputational damages” then why 8 months later has he not acted and punished the lying, good for nothing defamer to the fullest extent of the law like he promised and like his client deserves? Because you can’t do that when the other party has been telling the truth the entire time.

This begs to ask the question; How can a lawyer send someone 2 cease and desist emails threatening a lawsuit in state court, actually file a VERIFIED

complaint in state court, file an order to show cause further invoking the court's jurisdiction AND using its emergency processes, tell the court they are the designated TRIAL attorney, Demand a JURY TRIAL, certify that there is NO other action or arbitration, have a plaintiff VERIFY in that complaint that everything that was said was true under punishment of law and then when the opposing party shows up and starts litigating, the other lawyer cries foul, claims wrong forum and brings in an unrelated domestic violence lawsuit they were involved in claiming "stalking", "harassment " and that now they suffer from "severe anxiety", "emotional distress", and are now "RETRAUMATIZED "? I know EXACTLY how and I'm linking the filing I submitted to explain it all so it can be read.

The moral of this story is— See Pandos Harass someone, See Pandos Harass someone more, See Pandos LIE to the court multiple times, See Pandos get RETRAUMATIZED.

****DON'T BE A PANDOS****

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