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August 8, 2025

[REDACTED]

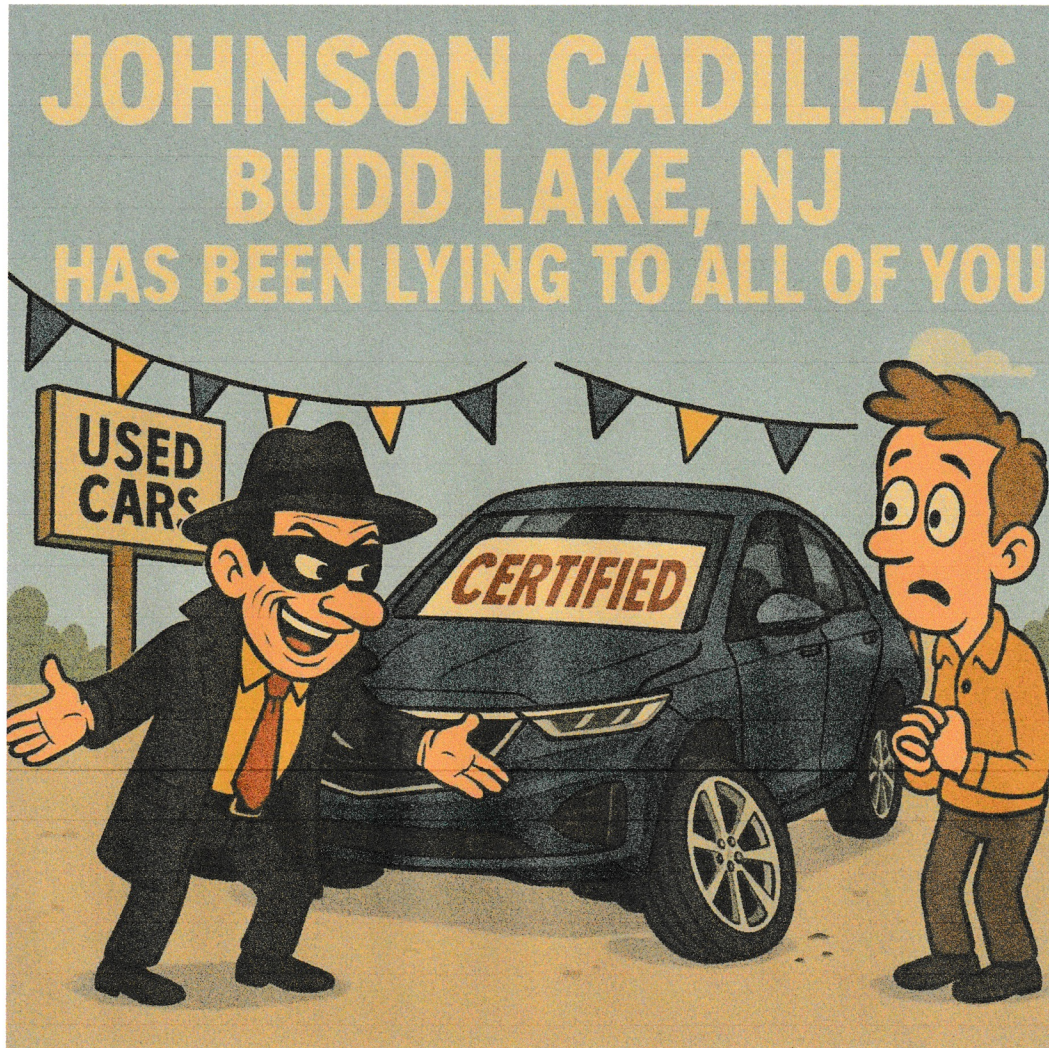
IMMEDIATE CEASE AND DESIST

Dear Mr. [REDACTED]

Please be advised that this office has been retained to represent Johnson Automotive Group concerning your ongoing tortious interference with its business opportunities, as well as your defamation of the business and its individual employees. You are commanded to immediately cease and desist all unlawful conduct, and to remove all offending content from your website badcadillac.com. If you fail to do so within 48 hours of receipt of this correspondence, I have been directed to initiate a lawsuit against you in the Superior Court of New Jersey without further notice, and to pursue injunctive, compensatory, and punitive relief to the fullest extent allowed by law.

Just recently, my client was made aware of your website badcadillac.com, where you present a fabricated tale of your interactions with the Johnson Automotive Group and its employees, falsely framing them as **"CONNING LIARS"**, **"SCAM ARTISTS"**, **"LYING SCUMBAGS"**, **"UNTRUSTWORTHY"**, **"HURTFUL"**, and falsely stating that **"THEY MUST'VE LIED TO AND THEREFORE SCAMMED HUNDREDS IF NOT THOUSANDS**

OF PEOPLE”, among many other defamatory and vile statements. You refer to individual employees as “CUNT”, “PRICK”, “PIECE OF SHIT”, “JERKOFF”, among many other viciously derogatory terms.



[Cartoon art with defamatory messaging posted on badcadillac.com]

You write these scathing false reviews despite never even having consummated a business dealing with Johnson Automotive Group. As you are certainly aware, you considered purchasing a used vehicle from Johnson Automotive Group in or about March 2024 and made a \$10,000.00 down payment in furtherance of same. When you expressed your dissatisfaction with the vehicle, Johnson Automotive Group was committed to righting the situation, by immediately accepting the

return of your vehicle and promptly refunding your \$10,000.00 deposit. You were made whole and were released from any obligation to purchase the vehicle. Notwithstanding, since that time, you have engaged in coordinated and purposeful conduct to damage the Johnson Automotive Group brand – you have even begun distributing business cards directing people to your website badcadillac.com.

The law of the State of New Jersey steadfastly protects businesses in the pursuit of their business dealings. Tortious interference with a business relationship occurs when a third party intentionally disrupts an existing or prospective business relationship, causing financial harm to the other party. Additionally, defamation occurs when someone makes a false statement of fact about another person or entity to a third party, which harms their reputation.

Your tortious conduct has caused and continues to cause actual damage to the Johnson Automotive Group and its individual employees whom you have defamed. Accordingly, you are commanded to immediately cease and desist all unlawful conduct, and to remove all offending content from your website badcadillac.com within 48 hours of receipt of this correspondence, or else a lawsuit will be filed against you in the Superior Court of New Jersey without further notice.

Please be guided accordingly.

Truly yours,

/s/ William H. Pandos

William H. Pandos

cc: John Johnson, III (*Via E-mail*)