



## Gross Law Group, P.A.

4408 DELWOOD LN, SUITE 14, PANAMA CITY BEACH, FL 32408  
2084 MEADOWLANE AVE, WEST MELBOURNE, FL 32904  
PHONE: 850-783-4800 OR 321-321-1441 • WWW.GROSSLAW.COM

May 5, 2026

### *Via Email and Certified Mail*

Sean Kelly  
221 New Holland Pike,  
Lancaster, PA 17601

Relentless, Inc., d/b/a Unhappy Franchisee  
P.O. Box 10232  
Lancaster, PA 17605  
UnhappyFranchisee@Gmail.com

### **Re: Cease and Desist - Defamatory Publications Concerning Keith Gross (Florida Jurisdiction)**

*Mr. Kelly and Relentless,*

I represent Keith Gross, a resident of Panama City Beach, Bay County, Florida, and a candidate for the United States House of Representatives for Florida's 2nd Congressional District.

This letter serves as formal notice and demand that you and Relentless, Inc., d/b/a Unhappy Franchisee (collectively, "you") immediately cease and desist from publishing, republishing, or otherwise disseminating false and defamatory statements concerning Mr. Gross, and that you take prompt corrective action as set forth below.

### **Florida jurisdiction and harm in Florida**

Your publications were accessible in Florida and caused injury to Mr. Gross in Florida, including in his congressional district in the Northern District of Florida, where he resides and where he first suffered reputational injury. Mr. Gross's claims will be pursued in Florida, and absent immediate compliance, he is prepared to file suit in the Federal Court in and for the Northern District of Florida.

### **Defamatory publications at issue**

Your GoFundMe fundraising page titled truth for veterans: protecting military families included a section designated #grossinjustice targeting Mr. Gross. That page states, in substance, that Mr. Gross has millions of dollars to spend on



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campaigns and asks, "*Where did he get the millions of dollars,*" while soliciting funds for a "*factual, documented report revealing what voters need to know.*" These statements were published publicly and were accessible to voters in Florida.

In addition, statements from your fundraising page and/or related publications were republished by Florida Politics in an article titled *watchdog blogger accuses Keith Gross of being part of a franchise scheme hurting Florida veterans.*

### **Falsity and defamatory assertions**

Your publications falsely mislead readers to believe that Mr. Gross obtained campaign funding through improper, illegal, or corrupt means and falsely assert involvement in franchise schemes harming Florida veterans. In fact, Mr. Gross is not involved in any franchise schemes and has no ownership in any of the brands referenced in your materials, and he is not personally involved in the representation of DonutNV or related franchise matters.

### **Your admissions and failure to cure**

On April 21, 2026, you acknowledged in writing, "*to be clear: I never accused you of being part of a franchise scheme that's hurting Florida veterans*" and further stated "*the fundraising page was created before I knew your law firm was representing DonutNV.*" Despite these acknowledgments, the defamatory statements have not been removed and no adequate correction or retraction has been issued. In fact, you have continued to ramp up and generate new articles and even use AI imaging to depict Mr. Gross shredding an NDA.

### **Demands**

Accordingly, you are hereby directed to take the following actions immediately:

1. Cease and desist from publishing or republishing any statements that directly or indirectly assert or imply that Mr. Gross engaged in wrongdoing, corruption, fraud, illegality, or "schemes" harming veterans, including insinuations regarding improper campaign funding.
2. Remove the #grossinjustice content and any other content referencing Mr. Gross from the GoFundMe page and from Unhappy Franchisee (including any posts, updates, captions, tags, metadata, and social media promotions) that convey the defamatory assertions described above.
3. Publish a prominent correction and retraction that:



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- states you do not accuse Mr. Gross of being part of any franchise scheme harming Florida veterans; and
  - clarifies that your prior fundraising language should not be understood to mislead the reader to think Mr. Gross is involved in illegal or improper campaign financing.
4. Preserve evidence (litigation hold): preserve all documents and electronically stored information relating to Mr. Gross, including drafts, edits, analytics, IP logs, communications with Florida Politics, GoFundMe records, donor communications, internal messages, and all materials reflecting the creation, publication, promotion, and readership of the statements at issue.
  5. Provide written assurances by (deadline: May 15 at 5 p.m. ET) confirming compliance with the above, identifying each URL/location where content was removed or corrected, and confirming that no further republication will occur.

### **Notice of claims and intent to proceed**

Your conduct has caused harm to Mr. Gross's reputation and campaign. If you do not comply fully by the deadline above, Mr. Gross will proceed with filing and pursuing claims, including defamation (libel), defamation per se, and related causes of action.

Nothing in this letter is a complete statement of Mr. Gross's claims, rights, or remedies, all of which are expressly reserved.

Sincerely,

Robert Vinson, Esq.  
rvinson@grosslaw.com  
paralegal@grosslaw.com  
*Attorney for Keith Gross*