

Jorden Hollingsworth
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02/11/2025

Via Certified Mail & Email

Maged Boutros
DRVM, LLC
411 E Bonneville Ave, Las Vegas, NV
Las Vegas, NV 89101

Final Demand for Payment – Wage Theft, Payroll Misclassification, and Compliance Violations

Dear Maged,

I am issuing this letter on the advice of legal counsel as a final attempt to resolve my claims before escalating this matter to arbitration, litigation, and regulatory enforcement. While arbitration may be the designated process for recovering unpaid wages, the broader legal concerns regarding payroll misclassification, tax compliance, and corporate misrepresentation require immediate attention to avoid further exposure to state and federal scrutiny.

Additionally, this case has direct ties to multiple corporate entities, including Fabian VanCott, QRIB Intermediate Holdings, Chattem, Inc., Zena, and Sanofi, increasing the risk of regulatory investigations and reputational damage. If this proceeds to arbitration or government review, corporate payroll practices and compliance will be under significant scrutiny, further exposing all entities involved.

Furthermore, if this matter escalates further, discovery will likely reveal that DRVM LLC generated revenue but failed to remit payments to state agencies, while simultaneously creating AMJ Services LLC to continue the same business operations. This will raise serious questions about whether corporate assets were commingled, payroll obligations were avoided, and financial fraud was committed through improper entity structuring.

Personal Liability of Maged Boutros Under Oregon Law (ORS 60.645)

Under ORS 60.645, members of a dissolved LLC can be held personally liable when the company continues to operate post-dissolution. DRVM LLC, listed on my paystubs, was revoked in Oregon but continued hiring and paying employees despite its dissolution. Because of this, I have legal grounds to hold Maged Boutros personally liable for the company's outstanding obligations. If arbitration proceeds, I will be required to name him individually. If legal action becomes necessary, it may extend to fraudulent misrepresentation in business operations.

Payroll Misclassification & Wage Law Violations

Through my investigation, I have uncovered corporate discrepancies suggesting payroll misrepresentation, financial mismanagement, and tax compliance issues, including:

- ✔ **Misclassification of Commissions as Hours Worked** – My paystubs falsely classify commissions as “hours worked”, overstating reported hours in payroll systems. This has led to minimum wage and overtime violations and incorrect reporting to ADP, tax agencies, and state labor departments, creating potential tax fraud and compliance risks. Whether intentional or not, this misrepresentation is a legal violation that may subject the company to regulatory penalties and payroll audits.
- ✔ **Employer Misrepresentation & Entity Swapping** – DRVM LLC continued hiring and issuing paystubs after its revocation, falsely presenting itself as an active entity. Meanwhile, AMJ Services LLC was registered immediately after DRVM LLC's revocation, yet DRVM continued issuing paystubs under its name.
- ✔ **Onboarding Paperwork Discrepancies** – My onboarding paperwork references ‘DR DEMO LLC’, an entity that does not legally exist in Oregon or Nevada.
- ✔ **Payroll Tax Withholding Concerns** – If DRVM LLC was dissolved, it is unclear where my payroll tax withholdings were remitted. If taxes were withheld but not properly reported, this could constitute payroll tax fraud.
- ✔ **Corporate & Financial Connections** – The company's headquarters at 411 E Bonneville Ave, Las Vegas, NV is directly linked to Fabian VanCott, QRIB Intermediate Holdings, Chattem, Inc., Zena, and Sanofi, raising serious concerns about financial structuring, payroll legitimacy, and tax reporting.
- ✔ **Potential Financial Fraud & Commingling of Assets** – The formation of AMJ Services LLC immediately after DRVM LLC's dissolution, while continuing the same business operations, strongly suggests that company funds and assets were transferred between entities to avoid financial obligations. If this matter proceeds to discovery, financial records will likely reveal that revenues were generated under DRVM LLC but not remitted to state agencies, while AMJ Services LLC was set up as a successor entity to carry on business operations. If so, this may constitute corporate fraud, improper asset transfers, and payroll tax evasion.

There are significant inconsistencies regarding the identity of my actual employer, calling into question the validity of the arbitration agreement. My onboarding paperwork references “DR Demo, LLC,” while my arbitration agreement was signed under “DRVM, LLC”, an entity dissolved in Oregon for over a year. A dissolved entity cannot enforce arbitration, making the agreement potentially void.

Additionally, Velma Veras, who signed the agreement, does not appear to be an officer of DRVM, LLC. If she represents AMJ Services, LLC or another entity, then the arbitration

agreement lacks proper authority and is unenforceable. If arbitration is pursued, I will challenge its validity and demand full discovery to determine which entity was truly responsible for my employment and payroll. While arbitration may be argued, I fully intend to proceed with court action, as the enforceability of the arbitration agreement is in question due to corporate misrepresentation and the dissolution of DRVM LLC.

Further, payroll appears to have been processed by AMJ Services, LLC, which was never disclosed in any employment documentation, raising concerns about corporate misrepresentation and payroll transparency.

Liability of Maged Boutros & Attempted Reinstatement

Reinstating DRVM LLC now will not erase past violations. Under ORS 60.645, members of a dissolved LLC remain personally liable for business activities conducted while the company was inactive. Since DRVM LLC continued hiring and paying employees post-dissolution, this constitutes unauthorized business activity, making Maged Boutros personally liable for its obligations.

If reinstatement occurs in response to this demand, it may be viewed as an attempt to conceal corporate noncompliance, further strengthening claims of fraudulent business practices and regulatory evasion. Additionally, if payroll funds were processed from a state where AMJ Services or DRVM LLC were not properly registered, this could add further legal violations related to state tax compliance.

Unpaid Wage Calculation & Legal Violations

1. Personal Liability of Maged Boutros (ORS 60.645)

- DRVM LLC is no longer a legal entity under ORS 60.701, yet it continued transacting business.
- Under ORS 60.645, members of a dissolved LLC may be held personally liable for ongoing business operations.

2. Unpaid Wages & Penalty Wages (ORS 652.140 & ORS 652.150)

- My final wages were not paid in full upon termination on 12/12/2024, triggering penalty wages of \$335 per day for up to 30 days (\$10,050 in penalties).

3. Minimum Wage & Overtime Violations (ORS 653.025, ORS 653.055, & FLSA 29 U.S.C. § 207)

- My paystubs misrepresent my total hours worked due to payroll misclassification.
- Under FLSA and ORS 653.261, I am entitled to overtime pay at 1.5x the regular rate.
- Based on my calculations, I am owed \$9,189.25 in unpaid wages, and under ORS 653.055, I am entitled to double damages, totaling \$18,378.50.

To resolve this matter without escalation, I demand:

- ## Final Opportunity for Resolution

- **Filing a formal arbitration demand through JAMS.**

- Please respond in writing by 02/17/2025 to confirm your intent to resolve this matter.

~~[REDACTED]~~