

**BEFORE THE UNITED STATES DEPARTMENT OF LABOR
OFFICE OF ADMINISTRATIVE LAW JUDGES**

In the Matter of:

JORDEN HOLLINGSWORTH,

Case No: 2025-TAX-00022

Complainant,

v.

DRVM LLC, et al,

Respondents.

_____ /

PETITIONER'S INITIAL DISCLOSURES

Complainant Jorden Hollingsworth, appearing pro se, submits these Initial Disclosures pursuant to the Notice of Docketing issued by Chief Administrative Law Judge Stephen R Henley on November 14th, 2025, and in accordance with 29 CFR § 18.50. Petitioner provides these disclosures based on the information reasonably available to him at this time and reserves the right to amend or supplement them pursuant to the rules of procedure.

I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

A. The Petitioner

Jorden Hollingsworth

Phone - _____/Email – Jordentimothy11@gmail.com

Subjects of Knowledge:

- IRS and SEC whistleblower filings

- events occurring after the issuance of IRS whistleblower claim numbers.
- interactions with respondents in arbitration and federal court
- employer identity history
- timeline of entity reactivations
- JAMS procedures and communications
- documentation of digital content removals that occurred after his protected whistleblower activity.

B. Individuals with Knowledge of Events Relevant to This Proceeding

1. Stephen M Scott, Esq

Fisher Phillips LLP

560 SW Tenth Ave, Suite 450

Portland, Oregon 97205

smscott@fisherphillips.com

Subjects of Knowledge:

- filings submitted on behalf of DRVM LLC
- arbitration communications
- statements relating to employer identity
- events occurring after IRS whistleblower filings
- objections filed in federal court related to IFP and procedural matters

2. Maged Boutros

Is associated with, or has control over, DRVM LLC, Basil Management Trust, and AMJ Services LLC, based on business records and communications.

Subjects of Knowledge:

- DRVM structure
- HR communications
- payroll practices
- business registrations and entity status changes

3. Ashraf Boutros

Is associated with, or has control over, Quten Research Institute LLC, DRVM LLC, Basil Management Trust, and MK Marketing, based on business records and communications.

Subjects of Knowledge:

- corporate relationship among Quten Research Institute LLC, DRVM LLC, AMJ Services LLC
- entity filings and reactivations
- shared addresses including Bonneville Avenue

4. Senior Corporate Leadership of Sanofi

Paul Hudson

Chief Executive Officer, Sanofi

Sanofi Global Headquarters, 46 Av. de la Grande Armée, 75017 Paris, France

Subjects of Knowledge:

As the Chief Executive Officer and the top decision-maker for the entire corporation, Paul Hudson possesses unique and non-delegable knowledge of Sanofi's highest-level strategic direction. His testimony and documents under his control are necessary to discover:

- The corporate understanding of, and strategic response to, the significant financial and reputational threat posed by Petitioner's IRS and SEC whistleblower filings.

- The rationale and business purpose behind corporate structural decisions and the reactivation of entities following the protected activity.
- His knowledge of the concurrent federal litigation and the corporation's overall posture towards Petitioner's claims.
- His ultimate authority over, and approval of, the legal strategy executed by outside counsel, including the Fisher Phillips law firm, in all proceedings involving the Petitioner. This goes directly to the corporation's motive and intent in its post-whistleblower litigation conduct.

Alexandra Roger

Global Head of Legal Corporate & Finance

Sanofi Global Headquarters, 46 Av. de la Grande Armée, 75017 Paris, France

Subjects of Knowledge:

As the Global Head of Legal, Alexandra Roger is the ultimate authority for all legal matters within Sanofi worldwide. She is a critical witness because she personally orchestrated or directly supervised the legal strategy Petitioner is challenging. Her knowledge is essential to discover:

- The specific direction, oversight, and coordination she provided to the Fisher Phillips law firm in formulating and executing the legal tactics used against Petitioner across multiple forums (JAMS arbitration, federal court, DOL). This includes strategy regarding arbitrator selection, procedural delays, and challenges to service of process.
- The legal advice provided to the corporation regarding its obligations in response to the whistleblower disclosures.

- Internal communications and legal analyses concerning the corporate relationships between Sanofi, Chattem, and Quten Research Institute LLC, which go to the heart of the employer identity dispute.
- Her direct role in managing and approving the legal budget and strategy that resulted in the specific retaliatory litigation conduct alleged in this proceeding.

C. Individuals with Knowledge of Procedural History

1. JAMS Representatives

Amy Thornton, and others to be identified

Subjects of Knowledge:

- arbitration case records
- deposit timelines
- arbitrator list creation
- communications and agreements regarding AI and emerging technology qualified arbitrators
- JAMS's actions and communications following the parties' objections.

2. United States Marshals Service Personnel

Subjects of Knowledge:

- attempts to serve Sanofi Aventis and Chattem Inc
- Returned Service documents

D. Individuals with Knowledge of Petitioner's Damages

1. Mindy Hollingsworth (Petitioner's mother)

Resides with Petitioner. Address and phone number available upon request.

Subjects of Knowledge (expected testimony will include):

- Daily, firsthand observations of Petitioner's emotional distress, anxiety, and changes in mood and behavior from April 2025 to present.
- Noticeable changes in Petitioner's sleep patterns, including difficulty resting and frequent late-night anxiety following litigation deadlines, filings by respondents, and entity-related developments.
- Observable physical signs of stress, including reduced appetite, fatigue, and episodes where Petitioner appeared visibly overwhelmed after receiving litigation-related communications.
- Declines in Petitioner's ability to maintain normal routines or responsibilities during periods of heightened legal activity.
- General deterioration in Petitioner's emotional stability following IRS whistleblower confirmations and subsequent procedural events in arbitration, federal court, and DOL proceedings.

2. Savannah Espinosa (Petitioner's partner)

Resides with Petitioner. Address and phone number available upon request.

Subjects of Knowledge (expected testimony will include):

- Daily observations of Petitioner's emotional distress, including visible anxiety, tearfulness, and difficulty concentrating during the relevant period.
- Instances where Petitioner appeared shaken, withdrawn, or unable to engage in normal activities shortly after litigation developments such as arbitrator roster issues, service disputes, entity reactivations, or social-media content removals.
- Observable physical indicators of stress, such as restlessness, reduced appetite, and visible tension during periods following major procedural events.

- Significant change in Petitioner's overall motivation, energy level, and engagement in daily life beginning shortly after the IRS whistleblower claim numbers were issued and continuing throughout the ongoing litigation.
- Ability to correlate Petitioner's changes in emotional condition with specific litigation events identified in the timeline exhibits disclosed in Section II.

II. DOCUMENTS AND TANGIBLE THINGS

Petitioner may use the following documents, filings, communications, and records to support his claims.

1. Whistleblower Filings and Confirmations

- IRS Whistleblower Office confirmation dated April 28th, 2025
- IRS correspondence reflecting claim referral activity dated June 26th, 2025
- SEC whistleblower submission confirmation dated April 8th, 2025
- Notice of False Claims to federal authorities

2. Corporate and Entity Evidence

- records showing reactivation of dissolved entities following IRS whistleblower filings
- records showing registrations of DRVM nationwide after IRS whistleblower filings
- multi-state reactivation documents for entities tied to Quten Research Institute LLC, DRVM LLC, and AMJ Services LLC
- filings showing shared address at 411 E. Bonneville Avenue
- corporate documents for Sanofi-Aventis, Chattem Inc, and Quten Research Institute LLC
- documents showing relationship between Ashraf Boutros, Maged Boutros, Quten Research Institute LLC and Qunol, Zena Nutrition, and Chattem Inc

3. Arbitration Records and Procedural Sequence

- original arbitration demand
- JAMS notices of nonpayment
- evidence that Respondents paid the JAMS retainer only after repeated follow-up communication regarding the outstanding fee
- Respondents' prompt rejection of Petitioner's arbitrator nomination.
- JAMS communication stating both parties must agree or federal court may appoint the arbitrator
- 48 hour deadline set by Petitioner regarding AI qualified arbitrator selection
- Respondents \$6,130 undisclosed deposit to Petitioner's checking account within the stated period
- evidence that Respondents paid a \$6,130 undisclosed deposit only after receiving Petitioner's notification of intent to file in federal court and within a 48-hour deadline set by that notification.
- Respondents written agreement to AI and emerging technology qualifications
- The approximately one-month period between the payment of a undisclosed deposit and the issuance of a new arbitrator roster by JAMS.
- The final arbitrator roster, which contained zero arbitrators whose JAMS profile reflected experience in AI, emerging technology, whistleblower and retaliation law, healthcare fraud, or tax fraud investigation.
- written objection to the list
- Petitioner's written qualification analysis of each arbitrator
- communications regarding substitution of counsel including GRSM withdrawal from representing AMJ Services and Maged Boutros

- JAMS dashboard logs showing removal of parties from dashboard only after GRSM reduced representation
- evidence of JAMS procedural delays following IRS filings

4. Federal Court Records and Procedural History

- federal petition to compel appointment of arbitrator under title 9 United States Code § 5
- assignment of case number 3-25-cv-01342-AB
- respondents' pre-filing before IFP determination
- objections filed by respondents during IFP evaluation
- docket entries showing five default deadlines for Maged Boutros, Quten Research Institute LLC, Marie-Laurie Boutros, AMJ Services LLC, and Ashraf Boutros
- three unsuccessful attempts by the U.S. marshals to serve Sanofi-Aventis and Chattem Inc
- motion by DRVM to correct docket for all respondents
- responses and sur-replies filed by Petitioner
- filings describing undisclosed deposits
- notice of SEC omission regarding reporting of the lawsuit
- timeline documentation submitted in federal proceedings

5. Employment and Payroll Records

- paystubs listing DRVM LLC as employer
- onboarding documents listing DRVM LLC
- timekeeping screenshots
- HR emails including those signed under the AMJ name
- communications reporting late payments

- evidence of multi entity payroll practices across states from additional workers

6. Communications Evidence

- email, text, and messages concerning retaliation employer identity or post IRS events
- communications that demonstrate Respondents were aware of Petitioner's whistleblower activity.
- communications showing chain of events around deposit deadlines, arbitrator objections, and service disputes

7. Social Media and Digital Platform Documentation

- screenshots of social media removals after Petitioner referenced IRS, SEC, and DOL involvement
- platform notices showing takedowns
- timestamps of deleted or restricted content
- records showing altered visibility of posts mentioning respondents or related entities

8. Public Documents, Timeline, and Compiled Exhibits

- all publicly available records about the entities
- detailed event timelines compiled by Petitioner
- exhibits created to map the sequence from April 28 to present
- materials summarizing procedural changes across arbitration, federal court, and OSHA DOL

9. Respondents' Filings Concerning Petitioner

Petitioner identifies filings submitted by Respondents in federal court and in arbitration proceedings that contain statements regarding Petitioner's credibility, characterizations of Petitioner's whistleblower activity, and assertions relating to the nature and scope of this dispute.

These filings include materials containing Respondents' characterizations of the underlying dispute, statements disputing Petitioner's conduct, and descriptions of Petitioner that are relevant to the issues of motive and intent in this proceeding. Petitioner may rely on these filings to show the sequence of events, the content of respondent assertions, and the context of representations made to the federal court and to JAMS.

10. Concurrent Federal Court Proceedings

Petitioner also identifies the ongoing federal court matter in *Hollingsworth v Sanofi-Aventis US et al, Case No. 3-25-cv-01342-AB*, as relevant concurrent proceedings. Filings, orders, service attempts, defaults, objections, IFP related activity, and procedural developments in that case may contain information Petitioner may use in this proceeding. Petitioner includes the federal action to provide full transparency regarding parallel whistleblower related litigation occurring at the same time as this Department of Labor matter.

III. COMPUTATION OF DAMAGES

Petitioner seeks all relief available under the Taxpayer First Act. Damages will be refined after discovery.

A. Emotional and Psychological Harm

- stress, anxiety, and emotional distress following events occurring after IRS and SEC filings
- distress caused by the burden of navigating complex, multi-forum legal processes.
- personal effects arising from digital content removals related to protected activity

B. Interference with Whistleblower Activity

- burdens created in pursuing IRS and SEC filings

- burdens and obstacles encountered due to procedural and administrative events in the associated arbitration and federal court proceedings.

C. Litigation Related Harm

- time and effort diverted to respond to legal filings and procedural developments
- burdens and time expended in resolving disputes concerning the identity of his employer.

D. Personal and Reputational Harm

- effects on Petitioner's sense of personal safety and wellbeing
- stress resulting from ongoing multi-forum litigation activity
- effects of respondents' statements and characterization of Petitioner contained in arbitration and federal court filings

Petitioner reserves the right to amend damage computations as discovery clarifies the scope of events.

IV. INSURANCE AGREEMENTS

Petitioner is not aware of any insurance policy that may cover any judgment.

V. RESERVATION OF RIGHTS

Petitioner reserves the right to amend or supplement these Initial Disclosures in accordance with orders of the Administrative Law Judge.

Respectfully submitted,

Dated November 20th, 2025

/s/Jorden Hollingsworth
Jorden Hollingsworth

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Jordentimothy11@gmail.com