

Jorden Hollingsworth

[REDACTED]

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Date: September 12, 2025

Office of Administrative Law Judges

Re: Hollingsworth v. DRVM LLC — Objections to Secretary's Findings

Dear Judge,

I am filing my formal Objections to the Secretary's Findings in this matter under the Taxpayer First Act (TFA). I respectfully request that this case proceed to a hearing.

OSHA's determination framed this case as if it ended with my termination by DRVM LLC in December 2024. But DRVM was dissolved during my employment, and the real protected activity, my IRS whistleblower filings, did not begin until **April 28, 2025**, when the IRS formally assigned claim numbers to Sanofi, Chattem, and Quten. From that point forward, retaliation escalated.

Since April 28, 2025, I have experienced repeated, targeted retaliation: hostile sanction filings, an undisclosed \$7,795.50 deposit made mid-arbitration to obstruct relief, badmouthing in federal filings, sanction language to pay the other parties attorneys fees for pursuing relief, removals from online platforms after naming the IRS respondents, and escalating efforts to damage my credibility. These are not ordinary litigation tactics. They are direct attempts to punish me for engaging with the IRS.

The Taxpayer First Act was designed for exactly this, protecting whistleblowers from retaliation aimed at silencing them once they report fraud to the government. OSHA's findings did not apply that standard.

I have timestamped evidence of each retaliatory act, and I will present it at hearing. This is not a dispute with a dissolved shell company; it is a case of systemic retaliation tied directly to protected IRS filings.

For these reasons, I respectfully ask that this matter proceed to a full hearing before your Honor.

Thank you for your time and consideration.

Respectfully,

Jorden Hollingsworth

A black rectangular redaction box covering the signature of Jorden Hollingsworth.

Date: September 12, 2025

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I hereby certify that on **September 12, 2025**, I served a copy of the foregoing *Objections to the Secretary's Findings* in the matter of *Hollingsworth v. DRVM LLC* et al by the following methods:

- Email to counsel for Respondent DRVM LLC, Fisher Phillips LLP, [Stephen M. Scott: **smscott@fisherphillips.com**]; Attorney for DRVM LLC in **Hollingsworth v. Sanofi-Aventis US et al. Case No. 3:25-cv-01342-AB**
- Mailed by United States Postal Services to DRVM LLC, **411 E Bonneville Ave STE 440, Las Vegas, NV 89101**;
- Email to James D. Wulff, Regional Administrator, OSHA San Francisco Region, at **osha-sfo-wb@dol.gov**.

Respectfully submitted,

/s/ Jorden Hollingsworth
Jorden Hollingsworth
Pro Se Petitioner

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Date: September 12, 2025

Jorden Hollingsworth

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UNITED STATES DEPARTMENT OF LABOR
OFFICE OF ADMINISTRATIVE LAW JUDGES

In the Matter of:

Jorden Hollingsworth,
Complainant

v.

DRVM LLC, Quten Research Institute LLC, Chattem Inc, Sanofi-Aventis US
Respondents

Case No. 301059686

Date: September 12, 2025

OBJECTIONS TO SECRETARY'S FINDINGS

Complainant Jorden Hollingsworth respectfully submits these Objections to the Secretary's Findings dated September 9, 2025, pursuant to 29 C.F.R. Part 1989, and requests a hearing before an Administrative Law Judge.

I. INTRODUCTION

The Secretary's Findings conclude that Complainant's claim under the Taxpayer First Act (TFA), 26 U.S.C. § 7623(d), is untimely and fails to state a prima facie case of retaliation.

Specifically, the Findings state that *Complainant's allegations did not make a prima facie showing* and that *Complainant's cited examples of adverse actions are not material*. Both conclusions are legally and factually incorrect.

The Findings narrowly frame the alleged retaliation as related to termination of employment, while ignoring the operative statutory timeline and the post-termination retaliation that arose only after the IRS formally assigned whistleblower claim numbers. The record shows multiple adverse actions, occurring after **April 28, 2025**, that easily meet and exceed the Burlington Northern materiality standard.

II. TIMELINESS UNDER THE TAXPAYER FIRST ACT

1. The Secretary's Findings incorrectly apply a December 31, 2024 termination date as the trigger for timeliness analysis. This date was incorrect in totality.
2. Under the TFA, the statute protects whistleblowers after they engage in protected activity, in this case, filing IRS whistleblower submissions.
3. The IRS formally assigned claim numbers to Sanofi, Chattem, and Quten Research Institute on **April 28, 2025**. Protections don't begin until this day. Retaliation began immediately thereafter and continues to this day.
4. Acts of retaliation post-IRS notification are within 180 days of the complaint filed **August 13, 2025**. Thus, the complaint was timely.

III. RETALIATION ANALYSIS

The Secretary's Findings incorrectly limit retaliation to termination and conclude that the adverse actions identified are not material. This misstates the law. Retaliation under the TFA is broad: it includes any action that would dissuade a reasonable person from whistleblowing to the IRS. *Burlington N. & Santa Fe Ry. Co. v. White*, 548 U.S. 53 (2006).

Following IRS notification, Respondents engaged in multiple, factually documented retaliatory acts:

- **False filings in arbitration and federal court:** Respondents filed papers filled with sanction language and personal attacks designed to intimidate and silence Complainant. These were not legitimate defenses, but eight-page personal attacks against a federally protected IRS whistleblower.
- **Obstruction of arbitration:** On July 1, 2025, a secret \$7,795.50 deposit was made mid-proceeding on to disrupt case flow and obstruct relief. No settlement agreement. No explanation. Approximately 64 days after IRS involvement on April 28, 2025.
- **Online suppression:** Complainant's posts and accounts were repeatedly removed from multiple platforms immediately after naming Sanofi, Chattem, and Quten in IRS whistleblower filings.
- **Public badmouthing and disparagement:** Respondents escalated personal attacks in legal filings and public forums to undermine credibility.
- **Federal court conduct:** While this case is live in federal court, Respondents have submitted premature filings containing false claims and sanction language. These filings are on the federal docket as of now and represent retaliation in its clearest form: billion-dollar corporations attempting to punish a federally protected whistleblower through reputational and procedural attacks.

Federal Case: Hollingsworth v. Sanofi-Aventis US et al Case No. 3:25-cv-01342-AB

These are not minor disagreements. They are material, adverse actions that would dissuade a reasonable person from pursuing IRS whistleblower claims. Complainant has timestamped evidence of each retaliatory act, including deposits, filings, online removals, and reputational attacks, all occurring after April 28, 2025. This evidence will be presented at hearing.

IV. STATUS OF DRVM LLC

The Findings improperly frame DRVM LLC as the sole “employer.” In fact:

1. DRVM LLC was dissolved/revoked during Complainant's employment.

2. Despite this, DRVM continued issuing W-2s and paychecks while revoked, conduct that is itself unlawful.

3. IRS whistleblower claim numbers were issued to Sanofi, Chattem, and Quten, not DRVM, demonstrating that DRVM was merely a pass-through shell.

4. Retaliation must therefore be viewed in the context of the larger Sanofi structure, not limited to a dissolved entity with no independent existence.

V. CONCLUSION

The Secretary's Findings misapplied the statutory timeline, misstated the scope of retaliation, and failed to account for multiple adverse actions that clearly meet the Burlington Northern materiality standard.

Complainant's claim is timely under the TFA, and substantial evidence shows post-IRS retaliation designed to obstruct and punish whistleblowing. In arbitration, online, and in active federal court proceedings.

For these reasons, Complainant respectfully requests:

1. That the Administrative Law Judge reject the Secretary's Findings;
2. That this matter proceed to hearing, with both parties permitted to present evidence; and
3. That the scope of retaliation be properly evaluated against the full Sanofi/Chattem/Quten structure, not limited to DRVM LLC.

Respectfully submitted,
/s/Jorden Hollingsworth
Jorden Hollingsworth
Pro Se Petitioner

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Date: September 12, 2025