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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

JORDEN HOLLINGSWORTH,

Case No. 3:25-cv-2308-SB
(Jury Trial Requested)

Plaintiff,

v.

SANOFI-AVENTIS US LLC; CHATTEM INC.;
QUTEN RESEARCH INSTITUTE LLC; AMJ
SERVICES LLC; STEVEN S. DICKERT, in his capacity as Trustee of BASIL
MANAGEMENT TRUST

Defendants.

**COMPLAINT FOR FRAUD, FRAUDULENT CONCEALMENT, CIVIL
CONSPIRACY, ALTER EGO LIABILITY, AND SUCCESSOR LIABILITY**

I. INTRODUCTION

1. This action began as a routine claim for approximately \$637.15 in unpaid wages. When the nominal employer listed on Plaintiff's paystub—DRVM LLC—failed to pay, Plaintiff examined public records to determine what entity was responsible.

2. That examination revealed that DRVM LLC was a dissolved shell with no lawful existence in the states where it operated. Its registered address, 411 East Bonneville Avenue in Las Vegas, served as the common hub for a network of interrelated entities—including MK Marketing LLC, Zena Nutrition LLC, and Basil Management Trust—that shared officers, ownership, and operational functions.

3. Further investigation traced operational and financial control upstream to multinational pharmaceutical leader Sanofi-Aventis U.S. LLC and its subsidiaries Chattem Inc. and Quten Research Institute LLC. These entities funded the nationwide payroll, supplied the products, and directed the demonstrator workforce, all while using the Nevada shells as conduits that concealed their role as the true employers. Plaintiff, a verified whistleblower, disclosed this structure to federal authorities. The IRS Whistleblower Office has assigned active claim numbers specifically for Sanofi, Chattem, and Quten, and Plaintiff is a complainant in a pending Taxpayer First Act retaliation proceeding before the Department of Labor.

4. Confronted with this discovery, Defendants did not clarify the corporate structure. Instead, they initiated a coordinated, multi-state campaign to retroactively activate the very shell entities Plaintiff had exposed, while simultaneously telling arbitration panels, this Court, and federal agencies that the case involved nothing more than a settled, minor wage dispute with DRVM LLC.

5. Plaintiff alleges that Sanofi-Aventis U.S. LLC itself—acting through its wholly-owned subsidiary Chattem Inc., its acquired entity Quten Research Institute LLC, and the Nevada-based Direct Demo Entities—directed, integrated, funded, and benefited from the multi-layered enterprise structure described in this Complaint. Following Sanofi’s 2023 acquisition of Quten, corporate filings, payroll records, and entity transfers reflect that Sanofi assumed operational control, incorporated the Bonneville-based entities into its corporate footprint, and maintained the same concealed employer structure under which Plaintiff and thousands of similarly situated workers were paid. Although certain day-to-day functions were carried out through subsidiaries and trust-owned LLCs, Plaintiff alleges that these entities acted at the direction of, for the benefit of, and as instrumentalities of Sanofi, which exercised ultimate

authority over payroll funding, product-line operations, and the corporate integrations that continued the structure after acquisition.

6. This lawsuit therefore addresses the fraud and obstruction that followed the initial wage claim: the deliberate concealment of employer identity, the issuance of false wage and tax documents through defunct entities, and the attempt to litigate through a shell to avoid accountability for the enterprise that controlled the work.

7. Defined Terms.

For purposes of this Complaint, the following defined terms apply:

- "Upstream Controllers" refers collectively to Defendants Sanofi-Aventis U.S. LLC, Chattem Inc., Quten Research Institute LLC, AMJ Services LLC, and Steven S. Dickert, as Trustee of the Basil Management Trust.
- "Direct Demo Entities" refers collectively to the Nevada-based limited liability companies used as the nominal employer of record, including but not limited to DRVM LLC, MK Marketing LLC, DRC DEMO LLC, and DR DEMO LLC.
- "Enterprise" refers to the single, unified business operation conducted by the Upstream Controllers through the instrumentality of the Direct Demo Entities and related corporate structures as alleged herein.

II. JURISDICTION AND VENUE

8. This Court has subject-matter jurisdiction under 28 U.S.C. § 1332(a). Plaintiff is a citizen of Oregon. Defendants Sanofi-Aventis U.S. LLC, Chattem Inc., Quten Research Institute LLC, AMJ Services LLC, and Steven S. Dickert, as Trustee of Basil Management Trust, are citizens of Delaware, New Jersey, Tennessee, and Nevada, respectively, and none maintains its principal place of business in

Oregon.¹ The amount in controversy exceeds \$75,000, exclusive of interest and costs, as reflected by the financial, tax, and legal injuries alleged herein.

9. This Court has personal jurisdiction over each Defendant because they directed employment and operational activities toward Oregon.² Plaintiff was engaged to work in Oregon warehouse locations; received wages, employment documents, and work-related communications in Oregon; and the alleged resulting impacts occurred within this District. Defendants' suit-related conduct establishes a substantial connection with this forum.³

10. Defendants deliberately availed themselves of Oregon law by funding and directing payroll for Oregon-based work; issuing employment and tax documents into the state; assigning supervisors and product inventory for Oregon locations; and maintaining a registered agent and corporate filings in Oregon for the nominal employer entity DRVM LLC. These contacts gave rise directly to the claims alleged here.

11. Venue is proper under 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to this action occurred within this District, including Plaintiff's employment, receipt of paystubs and W-2 forms, reliance on employer representations, and the resulting financial, tax, and legal injuries. Defendants' use of an Oregon address to maintain DRVM LLC's registration further supports venue.

12. Venue is also proper because Defendants' out-of-state conduct—including the multi-state registration of DRVM LLC and the dissemination of employment documents—was

¹ See *Hertz Corp. v. Friend*, 559 U.S. 77, 92–93 (2010) (holding a corporation's principal place of business is its "nerve center," or the place where its officers direct, control, and coordinate its activities).

² See *Walden v. Fiore*, 571 U.S. 277, 284 (2014) (requiring that "the relationship between the defendant and the forum State ... arise out of contacts that the defendant himself creates with the forum")

³ See *Ford Motor Co. v. Montana Eighth Jud. Dist. Ct.*, 592 U.S. 351, 362 (2021) (holding specific jurisdiction exists when a suit "aris[es] out of or relate[s] to the defendant's contacts with the forum").

directed toward and had effects within Oregon.⁴

13. Exercising jurisdiction over these Defendants is consistent with traditional principles of fair play and substantial justice.⁵

III. PARTIES

Plaintiff – Jorden Hollingsworth

14. Plaintiff Jorden Hollingsworth is an Oregon resident and a verified whistleblower with the IRS, SEC, and Department of Labor. He was employed as a W-2 product demonstrator inside Oregon Costco warehouses, where he sustained direct financial, tax, and legal injuries as a result of Defendants’ concealed multi-entity enterprise, payroll manipulation scheme, and coordinated misrepresentations across multiple judicial and administrative forums.

Defendant - Sanofi-Aventis U.S. LLC

15. Defendant Sanofi-Aventis U.S. LLC (“Sanofi”) is a Delaware limited liability company with its principal place of business of 55 Corporate Dr. Bridgewater, New Jersey, and is the U.S. subsidiary of the global pharmaceutical corporation Sanofi S.A. Following its 2023 acquisition of the Quten Research Institute, Sanofi assumed direct operational, financial, and managerial control over the associated demonstrator program. It funded the program's payroll, directed its upstream operators, and integrated the preexisting network of shell entities, which resulted in the concealment of the true employer and the evasion of wage, tax, and regulatory obligations.

⁴ See *Yamashita v. LG Chem, Ltd.*, 62 F.4th 496, 502–03 (9th Cir. 2023) (holding venue proper under 28 U.S.C. § 1391(b)(2) where a “substantial part” of the events giving rise to the claim occurred in the district, including where defendant’s out-of-state conduct was “expressly aimed” at the forum and caused foreseeable effects there).

⁵ See *Atl. Marine Constr. Co. v. U.S. Dist. Ct.*, 571 U.S. 49, 62 n.6 (2013) (noting that the doctrine of *forum non conveniens* and the venue-transfer statute, 28 U.S.C. § 1404(a), preserve the application of “traditional notions of fair play and substantial justice” underlying the personal-jurisdiction inquiry).

Defendant - Chattem Inc.

16. Defendant Chattem Inc. is a Tennessee corporation with its principal place of business in Chattanooga, Tennessee. Although headquartered in Tennessee, Chattem is a wholly-owned subsidiary of Sanofi-Aventis U.S. LLC, and its corporate filings list Sanofi's headquarters at 55 Corporate Drive, Bridgewater, New Jersey as the parent-company address. Chattem functioned as the Enterprise's HR nerve center, including issuing HR communications from Tennessee, coordinating payroll-related functions, and serving as a point of organizational control within the structure that obscured the identity of the true employer, thereby affecting Plaintiff's ability to obtain accurate information and exercise his legal and whistleblower rights.

Defendant – Quten Research Institute LLC

17. Defendant Quten Research Institute LLC ("Quten") is a Delaware limited liability company with a principal operational address of 10 Bloomfield Avenue, New Jersey. Quten was co-founded by Ashraf Boutros and Deepak Chopra and created the demonstrator workforce program and its underlying corporate structure. Following its acquisition by Sanofi in 2023, Quten operates within Sanofi's consumer health division. The brand Qunol and the corporate entity QRIB Intermediate Holdings LLC are part of this integrated Quten structure. Public records indicate that Quten managed the operational aspects of the national demonstrator program, including scheduling and training, which were administered through a series of Nevada-based corporate entities designated as the employer of record.

Defendant – AMJ Services LLC

18. Defendant AMJ Services LLC is a Nevada limited liability company with its principal place of business listed as 411 East Bonneville Avenue, Las Vegas, Nevada. Within the operational structure, AMJ managed the shipping and fulfillment of Qunol and Zena/VitaMina Labs products to the Enterprise's workforce. AMJ also issued human resources communications, managed payroll routing, and was a party to representations made in related administrative and judicial proceedings.

Defendant – Steven S. Dickert, as Trustee of Basil Management Trust

19. Steven S. Dickert, a Utah resident, serves as the trustee of Basil Management Trust, a Nevada business trust. Public filings identify Dickert as the Trust's trustee, and the Trust he controls appears as the managing entity for numerous corporate entities, including several identified as Direct Demo Entities, all sharing the 411 East Bonneville Avenue address. Following a series of corporate reinstatements in 2025, the Trust became the listed manager for these entities. The Trust has also been listed as the managing entity for other entities affiliated with Sanofi.

Collective Enterprise Allegations

20. Plaintiff alleges that Defendants Sanofi, Chattem, Quten, AMJ, and Steven S. Dickert as Trustee operated as a single, unified enterprise. They were bound together by common management, centralized control, a unified business purpose, commingled payroll funding, and deep trust integration. The function of this unified structure was the concealment of the true employer, resulting in the evasion of wage and tax liability, the misrepresentation of facts to regulators and tribunals, and the obstruction of Plaintiff's legal and whistleblower rights.

21. The downstream entities that appears on the Enterprises's employee's paychecks—including DRVM LLC, MK Marketing LLC, DRC LLC, and DRC DEMO LLC were instrumentalities, alter egos, or shields used by the Upstream Controllers.

22. The wrongful conduct alleged herein was executed by the Upstream Controllers, who used the Direct Demo Entities as instrumentalities of their single, unified Enterprise. Each Defendant participated in, directed, or benefited from this structure, and each is therefore liable for the acts of the others under principles of agency, alter-ego liability, and single enterprise liability. Defendants meet Oregon's test for piercing the corporate veil.⁶

IV. FACTUAL BACKGROUND

A. Plaintiff's Employment and Initial Wage Dispute

23. Plaintiff Jorden Hollingsworth worked as an in-store product demonstrator from October 15, 2024, to December 12, 2024, under the assumption he was employed by a company called Direct Demo.

24. Plaintiff conducted demonstrations inside Costco warehouses in Oregon, selling products from two brands:

- Zena Nutrition, and
- Qunol.

25. At the outset of his employment, Plaintiff was not aware of Sanofi, Chattem, Quten, AMJ Services LLC, or any upstream controlling entity. He was only aware of the products he was engaged to demonstrate in stores.

⁶ See *Amfac Foods, Inc. v. Int'l Systems & Controls Corp.*, 294 Or. 94, 108–09, 654 P.2d 1092, 1101 (1982) (establishing that piercing the corporate veil under Oregon law requires showing “(1) that the corporation is influenced and governed by the person asserted to be its alter ego, (2) that there is such unity of interest and ownership that the separate personalities of the corporation and the individual no longer exist, and (3) that adhering to the fiction of separate existence would promote injustice or perpetrate a fraud”).

26. Plaintiff's employment ended on December 12, 2024.

27. After termination, Plaintiff identified a small unpaid wage issue. Plaintiff sent a written notice on December 15, 2024, to the company's listed contacts:

- hr@directdemo.net
- payroll@directdemo.net

28. The wage issue was small and could have been resolved easily. Because the matter remained uncorrected, statutory penalties began accruing under Oregon law.

29. On January 4, 2025, Plaintiff sent another written notice advising the company of the outstanding unpaid wages and the applicable statutory penalties.

30. On January 8, 2025, a payment of approximately \$637.15 was deposited into Plaintiff's checking account, but no penalties were included. Plaintiff sent another written notice advising that the payment did not satisfy the wage claim and will be filing with BOLI.

31. On the same day, Plaintiff received an email, instructing him to call regarding the outstanding issue. The email was sent from an address using the directdemo.net domain and was signed by an individual identifying himself as "Collins Coltharp." The signature block included the name "AMJ LLC" alongside "Direct Demo" branding.

32. Plaintiff called the Tennessee telephone number provided in the email and recorded the conversation. During the call, Collins Coltharp represented himself as an HR contact for the workforce and referenced the "AMJ" entity.

33. During the call, Collins Coltharp stated:

"You know, I just started payroll here, not long ago, so I'm still trying to figure out the different jurisdiction and you know what we're legally required to do."

34. This raised concern regarding whether any functioning HR department existed for Direct Demo or DRVM.

35. During the recorded call, Plaintiff informed Collins Coltharp that Oregon wage laws required timely payment of all earned wages and provided a deadline of January 10, 2025, for payment. Coltharp acknowledged that a violation had occurred and that penalties were owed. The discussion then concerned the amount of penalties due.

36. Following this call, an email exchange ensued. On January 10, 2025, Coltharp communicated that he needed to consult his "leadership." Later that day, at the deadline Plaintiff had set, statutory penalties for the unpaid wages totaled approximately \$10,687.15. Defendants offered Plaintiff \$1,000 to settle the entire wage and penalty claim, contingent on signing an agreement that would waive legal recourse. Plaintiff declined this offer.

37. Plaintiff initiated a wage claim with the Oregon Bureau of Labor and Industries (BOLI). At that time, the matter involved only the unpaid wage issue, and Plaintiff had not yet discovered the concealed corporate structure behind the Direct Demo operations. Upon that discovery, Plaintiff withdrew the BOLI claim on February 5, 2025.

B. Plaintiff's Discovery of the Enterprise Structure

38. After Defendants failed to correct the unpaid wages and statutory penalties by the January 10, 2025 deadline, Plaintiff began searching publicly available information to determine which entity was responsible for payroll and compliance.

39. Plaintiff reviewed the information listed on his ADP wage statements, which identified DRVM LLC as the employer and listed 411 East Bonneville Avenue, Las Vegas, Nevada as the company's address.

40. Plaintiff then searched the Oregon Secretary of State business registry. The records showed that DRVM LLC's Oregon registration had been revoked, and was not authorized to transact business in Oregon at any point during Plaintiff's employment.⁷

41. The revoked Oregon filing identified Maged Boutros as the sole listed officer or manager of DRVM LLC.⁸

42. The listed registered agent for DRVM LLC in Oregon was Vilma Veras, at the address 535 S.W. Maple St., Hillsboro, Oregon 97123, which is a mobile home park.

43. Corporate records confirm DRVM LLC's authority to conduct business in Oregon was revoked on January 4, 2024. This revocation proves that DRVM LLC was a legally defunct shell entity throughout Plaintiff's entire employment from October to December 2024.

Consequently, every wage statement, onboarding document, and employment record issued to Plaintiff was predicated on a fraudulent corporate facade with no legal capacity to employ him.

44. These findings raised significant concerns about whether DRVM LLC was ever a real employer and whether another undisclosed entity had been controlling payroll and operations.

45. After reviewing DRVM LLC's revoked status, Plaintiff examined his onboarding documents and accessed the general Direct Demo employee dashboard for additional employer information. When logging in, the website displayed the message "Welcome to MK Marketing Team."

⁷ See Exhibit C, Oregon Secretary of State Business Registry Records for DRVM LLC (showing revocation of authority effective January 4, 2024).

⁸ Maged Boutros has served as a long-standing high-level executive at the Quten Research Institute. He is the son of Ashraf "Peter" Boutros, the Institute's CEO and co-founder. This relationship is relevant to the scheme alleged herein, as it provided Maged Boutros with the access, influence, and apparent authority necessary to facilitate the fraudulent conduct.

46. The footer of the dashboard identified MK Marketing, and the training section contained instructional videos labeled with MK Marketing branding. The product demonstration in the videos also identified MK Marketing as the presenting entity.

47. The employee handbook available on the dashboard was titled “MK Marketing Employee Handbook” and listed Mike (Maged) Boutros as the Chief Executive Officer. This matched the format of the handbook Plaintiff received during onboarding, which had been titled “Direct Demo” or “DR Demo.”

48. The name DRVM LLC did not appear anywhere on the employee dashboard, the training materials, or the handbook. The only onboarding document that referenced DRVM LLC was the arbitration agreement, where DRVM LLC appeared as the nominal employer for dispute-resolution purposes.

49. The website did not provide any corporate phone number, individual HR contact, or email address associated with DRVM LLC. Instead, the dashboard and materials presented MK Marketing and Direct Demo interchangeably, while the company listed on Plaintiff’s paystubs—DRVM LLC—was absent from all operational and employee-facing documentation other than the arbitration agreement.

50. After reviewing the DRVM LLC revocation in Oregon and the presence of MK Marketing throughout the employee dashboard, Plaintiff understood that the operation involved more than one entity and began researching to determine the identity of his actual employer.

51. Plaintiff searched the Nevada Secretary of State database using the address that appeared on his paystubs, 411 East Bonneville Avenue, Las Vegas, Nevada, and found that multiple entities associated with his employment—including MK Marketing LLC, DRVM LLC, and “Direct Demo” variations—listed this same address as their principal place of business.

52. A basic online search of “411 East Bonneville Avenue” revealed that the address corresponds to the law firm Fabian & Clendenin, which serves as the registered office for hundreds of Nevada LLCs. Many of these LLCs, based on public filings, have no other identifiable business location or operational presence.

53. Plaintiff located the Nevada filing history for MK Marketing LLC, which was formed on November 11, 2013, and dissolved on November 30, 2021. The records identified Maged Boutros and Ashraf Boutros as officers of the entity.

54. Plaintiff then reviewed the Nevada records for DRVM LLC, which was formed on June 6, 2021, just months before the dissolution of MK Marketing LLC in November 2021. The records listed Basil Management Trust as the entity holding ownership or control of DRVM LLC. This led Plaintiff to research Basil Management Trust within the Nevada registry.

55. The Nevada filings for Basil Management Trust and related entities revealed numerous LLCs and trusts listing the same officers repeatedly, including Ashraf Boutros, Maged Boutros, Deepak Chopra, and attorneys acting as signatories or managers on various filings.⁹

56. Each of these entities—MK Marketing, DRVM LLC, Basil Management Trust, and additional connected LLCs—listed 411 East Bonneville Avenue as their principal address or registered office.

57. Plaintiff further noted that Nevada corporate records showed address changes for several entities associated with the same officers. Their listed addresses were updated to locations including 55 Corporate Drive, Bridgewater, New Jersey—the corporate headquarters of Sanofi, where Chattem Inc. is listed as a manager—and to 10 Bloomfield Avenue, New Jersey,

⁹ See Exhibit A, Table 2 (listing entities associated with the Basil Management Trust and 411 East Bonneville Avenue address, and identifying their common officers, controllers, and representatives).

the address of QRIB Intermediate Holdings LLC, which is associated with Quten. These changes linked the Bonneville Avenue entities to the upstream corporate parents of the products Plaintiff had demonstrated.¹⁰

58. During the same Nevada registry searches, Plaintiff located Zena Nutrition LLC, the company associated with the Zena-branded products Plaintiff had demonstrated in Costco stores. Zena Nutrition LLC also listed 411 East Bonneville Avenue, Las Vegas, Nevada as its principal business address. The Nevada filing identified Ashraf Boutros as an officer.

59. Plaintiff then searched for additional entities associated with the Zena product line and located VitaMina Labs, the company identified as producing Zena products such as Super Greens and Liquid Collagen. VitaMina Labs likewise listed 411 East Bonneville Avenue as its Nevada address.

60. The records for VitaMina Labs showed an additional associated address: 15 Vela Way, Edgewater, New Jersey, which corresponded to the Boutros Family Foundation. This indicated that entities connected to the Zena product line used both the Bonneville address and the Vela Way address associated with the Boutros family.

61. These findings showed that companies controlling or producing a nationally sold retail product line—Zena—were registered to the same law-firm address at 411 East Bonneville Avenue, alongside the entities appearing on Plaintiff’s paystubs and onboarding documents.

62. Plaintiff further noted that Quten Research Institute LLC, the distributor of the Qunol products he demonstrated, was co-founded by Ashraf Boutros and Deepak Chopra, the same individuals appearing across the Bonneville-linked entities. Public information showed that Quten had been acquired by Sanofi in 2023.

¹⁰ See Exhibit A, Table 3 (listing entities, including MAK Digital LLC and QNB LLC, that are registered at Sanofi-affiliated addresses including 55 Corporate Drive and 10 Bloomfield Avenue).

63. The repeated appearance of the same officers—including Ashraf Boutros, Maged Boutros (who is listed as a sales and marketing executive for Quten), and Deepak Chopra—and the same principal address, 411 East Bonneville Avenue, across MK Marketing, DRVM LLC, Zena Nutrition, VitaMina Labs, Basil Management Trust, and related entities indicated that multiple companies connected to Plaintiff's work were registered to, or administered from, the same location.

64. These discoveries were the first indication to Plaintiff that his employment had not been with a single company but was instead connected to multiple entities registered to the same address, operated by the same individuals, and associated with the product lines he had demonstrated. This marked the point at which Plaintiff first understood that the matter involved a potential fraudulent structure extending beyond his individual wage issue.

C. Common Operational Hub at 411 East Bonneville Avenue

1. Shared Officers, Managers, and Trust Ownership

65. Public records show that the entities associated with Plaintiff's work—including DRVM LLC, MK Marketing LLC, MMB Marketing LLC, DRC Demo LLC, Zena Nutrition LLC, VitaMina Labs LLC, AMJ Services LLC, and Basil Management Trust—listed 411 East Bonneville Avenue, Las Vegas, Nevada as their principal business address or registered office.

66. The same 411 East Bonneville Avenue address appeared on Plaintiff's ADP wage statements, onboarding materials, and the Nevada corporate filings for multiple entities connected to the workforce.

67. Entities operating from the 411 East Bonneville address included: 1) companies issuing wage statements, such as DRVM LLC; 2) companies appearing on employee-facing platforms, such as MK Marketing LLC; 3) companies associated with the Zena product line,

such as Zena Nutrition LLC and VitaMina Labs LLC; 4) companies associated with Qunol product distribution; 5) companies holding intellectual property or marketing assets, such as MAK Digital LLC and MAK Media LLC; and 6) multiple trust-administered LLCs associated with the same officers.

68. The repeated use of the same address across these varied entities—spanning payroll, product brands, intellectual-property holding companies, marketing entities, and trust-controlled LLCs—indicated that 411 East Bonneville Avenue functioned as the central administrative hub for the entities connected to the demonstration workforce.

69. The public filings identify Ashraf (“Peter”) Boutros, Maged (“Mike”) Boutros, and Deepak Chopra as officers, managers, or signatories on numerous entities registered at 411 East Bonneville Avenue. These individuals were also listed as founders, executives, or affiliated persons of companies connected to the Qunol and Zena product lines.

70. Many of the same entities were organized, owned, or controlled through Basil Management Trust, which appeared in Nevada filings as the member, manager, trustee, or organizing party for multiple LLCs associated with the demonstration workforce. Basil Management Trust acted as the holding entity for DRVM LLC and was also connected to other entities registered at the 411 address.

71. Additional filings showed that attorneys or legal representatives associated with the 411 East Bonneville Avenue law firm signed formation documents or amendments for several of these entities, appearing as authorized managers, officers, or filing agents across a range of LLCs connected to the workforce.

72. Several entities registered under Basil Management Trust—including DMC Enterprises LLC, MKGP Partners LLC, MMB Marketing LLC, and others—also listed the same

officers as DRVM LLC, MK Marketing LLC, and the Zena-related entities, indicating common management across entities performing different business functions.

73. The recurring appearance of the same officers, the same controlling trust (Basil Management Trust), and the same filing agents created a consistent pattern of centralized ownership and administration across the entities connected to Plaintiff's employment.

2. Product-Line Corporate Structure: Zena, VitaMina Labs, MK Marketing, Qunol, and AMJ Services

74. Public filings show that the entities responsible for the product lines Plaintiff demonstrated in Costco—specifically Zena Nutrition and Qunol—were tied to the same officers, addresses, and corporate structures as the entities issuing Plaintiff's wage statements and onboarding documents.

75. Nevada Secretary of State records list Zena Nutrition LLC as a company registered at 411 East Bonneville Avenue, Las Vegas, Nevada, the same address used by DRVM LLC, MK Marketing LLC, MMB Marketing LLC, DRC Demo LLC, and other entities associated with the demonstration workforce. The filing identified Ashraf Boutros as an officer.

76. Employee-facing materials, including the onboarding handbook, dashboard interface, and training videos available to Plaintiff, displayed MK Marketing branding and included demonstration videos for both Zena and Qunol products. These materials did not reference DRVM LLC, the entity listed on Plaintiff's wage statements.

77. Public information and corporate filings show that AMJ Services LLC—also registered at 411 East Bonneville Avenue—served as the fulfillment and shipping entity for the Zena and Qunol product lines. AMJ Services' filings identify the same officers and agents appearing across other Bonneville-registered entities, and its shipping and logistics role

connected the product-line companies directly to the entities associated with Plaintiff's payroll and onboarding materials.

78. Public information further shows that Quten Research Institute LLC—the distributor of Qunol products—was co-founded by Ashraf Boutros and Deepak Chopra, the same individuals appearing as officers across the Bonneville-registered entities and product-related LLCs.

79. Quten Research Institute LLC was acquired by Sanofi in 2023. Following the acquisition, some entities associated with the Qunol product line and registered at the Bonneville address began to reflect updates in their filings linking them to Sanofi or its subsidiary, Chattem Inc., including updated addresses and officers.

3. Origins and Continuity of the Enterprise (2013–2025 Shell Rotation)

80. Public records reflect that the entities associated with Plaintiff's employment did not originate during the period of his work in 2024, but traced back more than a decade. In 2013, MK Marketing LLC was formed in Nevada by individuals who also held executive or ownership roles at Quten Research Institute LLC, including Ashraf Boutros and Deepak Chopra. MK Marketing appears as the earliest known entity associated with the demonstrator workforce later operating under multiple names.

81. After MK Marketing's formation, Nevada records show a succession of similarly structured entities—including MMB Marketing LLC, DRC Demo LLC, and DRVM LLC—that appeared at different points over the next twelve years. These entities shared overlapping officers or managers and were registered to the same principal address at 411 East Bonneville Avenue, Las Vegas, Nevada.

82. Throughout this period, several of these entities were dissolved, revoked, or inactive in Nevada or other states where they appeared on wage statements or employee-facing documents. Despite these lapses, successor entities with substantially similar names, officers, and addresses appeared in subsequent years, reflecting an ongoing rotation of companies performing the same functions.

83. Nevada business filings show that the Direct Demo Entities were organized, owned, or later transferred through Basil Management Trust. Basil Management Trust appeared repeatedly as a member, manager, trustee, or controlling party for these entities registered at 411 East Bonneville Avenue.

84. Additional filings indicate that trusts associated with the same individuals served as organizers or owners of other entities located at the Bonneville address. These trusts appeared in formation documents, amendments, and annual filings for companies involved in payroll, marketing, brand ownership, and product distribution.

85. The continuity in officers, trust ownership, and the shared Bonneville address over a twelve-year period shows that the Direct Demo Entities formed a sequence of companies used for similar purposes associated with the same workforce and product lines.

86. Public records further show that the same officers present in the earliest entities, including Ashraf Boutros and Maged Boutros, continued to appear in filings for entities created or updated through 2024. These later entities include those associated with the Zena product line, Quten Research Institute LLC, and the trust-controlled entities registered at the Bonneville address.

87. The rotation of entities—combined with overlapping officers, recurring trust ownership, and the consistent use of the 411 East Bonneville address—reflected an ongoing

operational structure that persisted from 2013 through 2025 and included the entities appearing on Plaintiff's paystubs and onboarding documents.

4. Unified Payroll Structure and Commingling of Wages, Commissions, and Hours

88. Payroll for the nationwide demonstrator workforce was processed through ADP under the names of various Direct Demo Entities, including DRVM LLC. This occurred during periods when entities like DRVM LLC were dissolved, inactive, or unregistered in states where demonstrators worked. The entities listed on the payroll had no listed officers, human resources personnel, or functional business operations. The upstream controllers directed which entity name was used in the ADP system without notifying employees of these changes.

89. On the backend, ADP received combined compensation inputs from entities operating at 411 East Bonneville Avenue, Las Vegas, Nevada, including amounts attributable to demonstrations of Qunol products and Zena/VitaMina Labs products. These inputs were transmitted as a single merged dataset, rather than as separate wage and commission categories or by product line.

90. The merged entries were funded by the upstream controllers—Sanofi, Chattem, and Quten—who directed the demonstrator program and supplied the products being sold. Although employees understood Zena and Qunol to be unrelated brands, their compensation for both product lines was pooled into the same lump-sum employer input processed through DRVM LLC's ADP profile.

91. ADP then converted the combined sales and commission data into artificial "hours worked." As a result, paystubs regularly reflected inflated hour totals that did not correspond to the hours actually worked. For example, Plaintiff's paystub for the period

including the week of November 29, 2024 listed 216 hours, although Plaintiff did not work 216 hours during that period.¹¹

92. On the employee-facing paystub, wages and commissions appeared to be separated and itemized, creating the impression that compensation was properly categorized and that Zena and Qunol represented distinct business lines. However, the backend merging of these inputs meant that ADP treated the compensation as a single block of earnings funded by the same controllers, masking the sources of payment and obscuring the payroll structure.

93. This payroll structure resulted in the following:

(a) The entity listed as the employer on wage documents was separate from the entities funding the payroll;

(b) Compensation for work on separately owned product lines (Zena and Qunol) was commingled and reported as a single stream;

(c) The entity named on the documents, such as DRVM LLC, was often not in active corporate standing;

(d) Earnings from different brands were not segregated in wage reporting; and

(e) Wage statements and W-2 forms reflected hours calculated from sales units rather than actual time worked.

94. The merging of commissions and hours, and the pooling of product-based compensation into single employer inputs at 411 East Bonneville Avenue, is a material component of Plaintiff's federal whistleblower submissions. These facts reflect the existence of a unified enterprise structure directing payroll, reporting, and labor operations across the two product lines and the entire demonstrator workforce.

¹¹ See Exhibit E, Representative Paystubs and ADP Records (showing the conversion of sales/commission data into reported hours, including the paystub reflecting 216 hours for the period ending November 29, 2024).

5. Integration into Sanofi, Chattem, and Quten Following the 2023 Acquisition

95. Public information shows that in 2023, Sanofi-Aventis U.S. LLC acquired Quten Research Institute LLC, the company responsible for the Qunol product line that Plaintiff demonstrated inside Costco warehouses. Following the acquisition, entities associated with the Qunol brand and the demonstration workforce began to reflect updates in their corporate records linking them to Sanofi and its subsidiary Chattem Inc.

96. After the acquisition, Nevada filings for several entities registered at 411 East Bonneville Avenue—including entities connected to Qunol, Zena Nutrition, and trust-controlled LLCs—reflected amendments, officer additions, or address updates identifying Sanofi’s headquarters at 55 Corporate Drive, Bridgewater, New Jersey or Quten Research Institute’s address at 10 Bloomfield Avenue, New Jersey.

97. Entities that had previously been organized or controlled through Basil Management Trust began to appear in filings showing transfers, updated managers, or new addresses associated with Sanofi or Chattem. These updates occurred between 2023 and 2024 and involved entities holding product-related intellectual property, digital marketing assets, or functions related to the distribution of Qunol and Zena products.

98. Nevada records show that companies including MAK DIGITAL LLC, MAK MEDIA LLC, MAK NUTRITION LLC, TPD IP LLC, QPD IP LLC, and QNB IP LLC—entities associated with marketing, branding, or intellectual property for the product lines Plaintiff demonstrated—were among those that underwent changes in filings after the acquisition, including updates reflecting Sanofi- or Chattem-linked addresses.

99. The filing history shows that entities originally organized at the 411 East Bonneville address and controlled through Basil Management Trust were incorporated into the broader Sanofi corporate structure after the 2023 transaction, with new corporate addresses and officers associated with Sanofi and Chattem appearing in state records beginning in 2024.

100. These post-acquisition updates occurred alongside the continued registration of the Bonneville-based entities, the rotation of demonstrator-related LLCs, and the activity of trusts connected to the same officers who appeared in earlier filings for MK Marketing LLC, MMB Marketing LLC, DRC Demo LLC, and DRVM LLC.

101. The sequence of filings reflects that, following Sanofi's acquisition of Quten Research Institute LLC, entities associated with product lines demonstrated by Plaintiff and companies historically connected to the Bonneville address began to integrate into Sanofi's and Chattem's corporate footprint through updated addresses, officers, and administrative filings.

6. Summary of the Unified Enterprise Structure

102. Taken together, the public records described above reflect a unified operational structure in which (1) numerous entities connected to Plaintiff's work shared the same principal address at 411 East Bonneville Avenue; (2) the same officers, managers, and trust administrators appeared repeatedly across filings for those entities; (3) the product-line companies responsible for Zena, VitaMina Labs, MK Marketing, and Qunol operated from that same address and listed the same individuals as officers; (4) the entities that appeared over a twelve-year period—including MK Marketing LLC, MMB Marketing LLC, DRC Demo LLC, and DRVM LLC—formed a continuous sequence of companies performing similar functions with overlapping control; and (5) after Sanofi's 2023 acquisition of Quten Research Institute LLC, several entities associated with the product lines and the Bonneville address began to appear in filings reflecting

updated corporate addresses or affiliations linked to Sanofi and Chattem. These records show an interconnected group of entities with shared addresses, officers, and trust ownership spanning more than a decade and encompassing the companies that issued Plaintiff's wage statements, maintained employee materials, and held the product brands he demonstrated.

103. After Plaintiff began identifying inconsistencies in his wage statements, onboarding materials, and the corporate records of the entities associated with his work, public filings across multiple states reflected a series of actions by the same entities and individuals described above. These actions occurred immediately after Plaintiff's January 2025 notices and continued throughout his arbitration, whistleblower, and federal proceedings. The timing, sequence, and scope of these filings form the basis of the post-discovery conduct described in the following section.

D. Initiation of Arbitration and Immediate Corporate Activity

1. Arbitration Demand and Initial Uncovering of the Shell Structure

104. While Plaintiff was reviewing wage statements, onboarding documents, and public records, he initiated a JAMS arbitration to resolve the narrow wage-and-penalty issue that remained outstanding as of January 2025. On February 19, 2025, Plaintiff filed an arbitration demand in JAMS Case No. 5160000821, naming DRVM LLC, AMJ Services LLC, and individual manager Maged Boutros based on DRVM LLC's dissolved status and lack of limited-liability protection.

105. On February 26, 2025, Plaintiff amended the arbitration demand to name the Upstream Controllers and other entities connected to the operational structure, identifying the real parties in interest.

106. At this time, Plaintiff discovered that DRVM LLC—the entity listed on his paystubs as his employer—was not merely inactive: it had no registration in nearly every state in

which the nationwide demonstration workforce operated, despite functioning as the nominal employer of thousands of workers inside Costco warehouses nationwide.

2. First Wave of Activations (Beginning January 10, 2025)

107. On January 10, 2025—the same day Plaintiff issued his written deadline regarding unpaid wages—public records reflected the first wave of DRVM LLC activations. These were not reinstatements from prior existence in most jurisdictions; rather, they appeared as first-time foreign registrations in states where DRVM LLC had never previously existed.¹²

108. These initial filings occurred immediately following Plaintiff’s January 10 notice and appeared across states where Plaintiff never found any historical record of DRVM LLC, despite DRVM appearing as the employer on paystubs for a nationwide Costco workforce.

3. Second Wave of Activations (Following February Arbitration Filings)

109. After Plaintiff filed his arbitration demand on February 19, 2025, and amended it on February 26, 2025, a second wave of DRVM LLC filings appeared in additional states. As with the first wave, these were largely new registrations in jurisdictions where DRVM LLC had not existed at any time during the enterprise’s nationwide operations.

110. These February–March filings expanded DRVM LLC’s footprint into states where it had never been authorized to conduct business during the period it purportedly employed demonstrators. No corresponding operational explanation appears in public records for the timing or sequence of these new foreign registrations.¹³

4. Third Wave of Activations (Following April 8 Whistleblower Submissions)

¹² The first wave of DRVM LLC reinstatements and registrations after Plaintiff’s notice included filings in Alaska (January 10, 2025), Idaho (January 13, 2025), Iowa (January 13, 2025), and Indiana (January 14, 2025). See Exhibit A, Table 1.

¹³ This second wave of registrations included filings in Michigan (March 20, 2025), Minnesota (March 20, 2025), Mississippi (March 21, 2025), Missouri (March 21, 2025), and Montana (March 21, 2025).

111. On April 8, 2025, Plaintiff submitted whistleblower disclosures to the IRS, SEC, and DOL identifying inconsistencies between payroll entities, corporate records, and the product-line companies.

112. In the weeks following these submissions, a third wave of DRVM LLC filings appeared across multiple states. This wave again consisted primarily of first-time foreign registrations in jurisdictions where DRVM LLC had not existed prior to Plaintiff's disclosures.

113. This third wave included the reinstatement of DRVM LLC in Oregon—the state where Plaintiff worked—despite DRVM LLC's Oregon registration having been revoked during Plaintiff's period of employment. The reinstatement transferred authority from the listed officer, Maged Boutros, to Basil Management Trust, and changed the registered office from a residential trailer-park address back to the 411 East Bonneville address used by the related entities.¹⁴

5. May 28, 2025 Multi-State Cluster and Concurrent MAK Digital Transfer

114. On May 28, 2025, public records showed the largest single-day set of DRVM LLC filings across the country. This activity included numerous new foreign registrations and updates submitted on the same date, reflecting the most extensive wave of filings during the entire period.

115. On the same day—May 28, 2025—Basil Management Trust executed the transfer of MAK Digital LLC, an entity connected to marketing and digital assets for the product lines Plaintiff demonstrated, out of the trust and into direct Sanofi control.¹⁵

¹⁴ See Exhibit C, *Oregon Secretary of State Filing (showing the reinstatement of DRVM LLC and transfer of its management to the Basil Management Trust on April 25, 2025)*.

¹⁵ See Exhibit D, *Corporate Transactions Dated May 28, 2025 (including (1) the Basil Management Trust's filing to register DRVM LLC as a foreign entity in Delaware, and (2) the Trust's execution of the transfer of MAK Digital LLC into the corporate structure of Sanofi's Opella division at 21 South Street, Morristown, New Jersey 07960)*.

116. The concurrence of DRVM LLC's largest multi-state activation event with the transfer of MAK Digital LLC mirrored the broader timing pattern of entity activity occurring after Plaintiff's wage notices, arbitration filings, and whistleblower submissions.

E. Multi-Forum Obstruction and Contradictory Representations

1. Arbitration Begins as a Simple Wage Dispute

117. What began as a routine arbitration over a small unpaid-wage issue became increasingly difficult to advance. After Plaintiff filed an arbitration demand on February 19, 2025 naming DRVM LLC, AMJ Services LLC, and manager Maged Boutros, counsel from GSRM contacted Plaintiff stating they represented DRVM LLC. The JAMS dashboard reflected GSRM as counsel for DRVM LLC, AMJ Services LLC, and Maged Boutros at that time.

118. After Plaintiff amended the arbitration demand on February 26, 2025 to include the Upstream Controllers pursuant to the third-party clause in the arbitration agreement, GSRM declined to continue representing AMJ Services LLC and Maged Boutros, despite previously appearing for them, and despite the entities being part of the same group of companies. No explanation was provided.

2. Plaintiff Gives Notice the Dispute Involves the Broader Structure

119. On April 6, 2025, Plaintiff sent a settlement letter stating that the matter could no longer be resolved as a small wage claim, identifying broader structural issues and estimating potential nationwide impact. Plaintiff informed Defendants that if they did not appear through appropriate counsel by April 8, 2025, he would amend the arbitration demand to reflect the full scope of the alleged conduct and would submit whistleblower disclosures to federal agencies.

120. On April 8, 2025, Plaintiff submitted whistleblower filings to the IRS, SEC, and Department of Labor. On April 9, 2025, Plaintiff informed Defendants of the submissions.¹⁶

3. Appearance of Multiple Law Firms for the Same Entity

121. On April 14, 2025, Fisher Phillips LLP filed a notice of appearance on behalf of DRVM LLC in the JAMS arbitration—an entity already represented by GSRM. The two firms appeared unaware of each other's involvement.

122. During this time, DRVM LLC remained unregistered in Oregon, where Plaintiff had worked. On April 25, 2025, DRVM LLC's Oregon registration was reinstated, changing the listed officer from Maged Boutros to Basil Management Trust, and updating the registered office from a residential address to the 411 East Bonneville address.

123. On April 28, 2025—the same day Plaintiff received IRS claim numbers for Sanofi, Chattem, and Quten—GSRM withdrew from the JAMS arbitration without explanation, leaving Fisher Phillips as the only appearing counsel for DRVM LLC.¹⁷

4. Defaults Across Forums

124. All respondents were properly served under JAMS Rules by early March 2025. Despite proper service, no entity other than DRVM LLC appeared. AMJ Services LLC, Maged Boutros, Ashraf Boutros, Deepak Chopra, Quten Research Institute LLC, Chattem Inc., and Sanofi-Aventis U.S. LLC did not file appearances or responses.

5. Delays in Paying Retainer Fees and Difficulty Advancing Arbitration

¹⁶ Plaintiff's April 8, 2025 whistleblower submissions were made to the IRS, SEC, FTC, and the Department of Labor's Office of Inspector General. Plaintiff also submitted a supplemental filing to the SEC on October 29, 2025, notifying the agency that Defendants' October 27, 2025 Form 10-K omitted disclosure of the ongoing legal proceedings and Plaintiff's whistleblower filings.

¹⁷ See Exhibit B, IRS Whistleblower Office Referral Letter Dated April 28, 2025 (assigning claim numbers to Sanofi, Chattem, and Quten, and not to DRVM LLC).

125. Arbitration could not proceed because DRVM LLC, through Fisher Phillips, delayed payment of the required retainer. Plaintiff filed a Motion under JAMS Rule 6(e) requesting that the arbitration move forward because the responding party had not participated.

126. In his motion, Plaintiff nominated an arbitrator with expertise in artificial intelligence and emerging technologies, consistent with JAMS Rule 15(b).

127. JAMS notified the parties it would issue a final request for payment and would close the case if no retainer was paid. The next day, Defendants paid the retainer and filed an opposition to Plaintiff's arbitrator nomination.

128. Because the parties could not agree on an arbitrator, JAMS indicated that the agreement required the Court to appoint one if the parties reached an impasse.

6. July 1, 2025: Arbitrator Impasse and Unexplained Deposit

129. On July 1, 2025, Plaintiff informed Defendants he would seek court appointment of an arbitrator unless the parties agreed on specific qualifications under JAMS Rule 15(b) within 48 hours.

130. Hours later on July 1, 2025, Plaintiff received an unexplained deposit of approximately \$6,130.10 from DRVM LLC into his checking account. No notice, paystub, or explanation accompanied the payment, and it had not been disclosed in arbitration.

131. Plaintiff froze the account and uploaded the banking record to the JAMS dashboard. Plaintiff stated he would still agree to proceed in arbitration without filing in federal court if the parties reached agreement on arbitrator qualifications.

132. On July 2, 2025, Fisher Phillips agreed to the arbitrator qualification criteria under JAMS Rule 15(b), including the need for expertise in artificial intelligence and emerging technologies, thereby keeping the selection process within the arbitration forum.

7. Continued Delay in Arbitrator Appointment

133. During July 2025, Plaintiff repeatedly followed up seeking an arbitrator list consistent with the qualifications both parties had agreed to.

134. On July 25, 2025, JAMS issued an arbitrator strike-and-rank list. None of the proposed arbitrators had qualifications in artificial intelligence, emerging technologies, or whistleblower matters, despite those qualifications being the basis for resolving the earlier impasse.

135. Plaintiff requested correction within 48 hours. When no corrected list was provided, Plaintiff filed a petition to compel arbitration in federal court, seeking court appointment of an arbitrator under the agreement.

8. Proceedings in Federal Court

136. Plaintiff filed the petition to compel arbitration on July 31, 2025, with an application to proceed in forma pauperis. Before the court ruled on that application, Fisher Phillips filed a response on August 14, 2025. The response characterized the matter as a resolved \$637.15 wage claim, asserted Plaintiff was acting in bad faith and abusing the court's and arbitrator's jurisdiction, omitted reference to Plaintiff's federal whistleblower filings and IRS claim numbers, and represented that the various corporate entities named were unrelated.

137. On July 16, 2025, Fisher Phillips filed an answer in the arbitration on behalf of DRVM LLC. This filing stated that DRVM LLC had paid Plaintiff \$637.15 and that no penalties were owed. The filing did not reference the \$6,130.10 deposit made to Plaintiff's account on July 1, 2025.

138. Subsequently, in a response filed in this Court on August 14, 2025, Fisher Phillips asserted for the first time that the July 1, 2025 deposit rendered Plaintiff's claims moot, arguing the \$6,130.10 payment exceeded the \$637.15 referenced in the arbitration.¹⁸

139. Plaintiff's IFP application was granted and service was ordered on all nine respondents. The U.S. Marshals successfully served 6 of the nine; only Chattem Inc. and Sanofi-Aventis U.S. LLC remained unserved after multiple attempts.

9. Ex Parte Communication and Docket Correction

140. On September 2, 2025, Fisher Phillips sent an ex parte communication to the Court, from which Plaintiff was excluded, attempting to narrow the scope of the case. The Court did not act on this communication. In a subsequent order dated September 4, 2025, the Court stated only that DRVM LLC had already filed a response and that no further response from DRVM LLC was required until other named respondents appeared.

141. Deadlines passed without appearances from the non-DRVM respondents. Only Deepak Chopra, represented by Miller Nash, filed a motion to dismiss, stating he had no involvement and describing the case as a simple wage dispute.

142. On September 19, 2025, Fisher Phillips filed a notice of appearance for AMJ Services LLC—after months of stating AMJ was unrelated—and moved to “correct the docket” for all respondents under the DRVM LLC caption. The motion interpreted the Court's September 4 order as eliminating the requirement for any other respondent to appear.

10. October 13, 2025 Address Modification

¹⁸ In its August 2025 filing before this Court, Fisher Phillips represented the July 1, 2025 transaction as a payment of \$7,795.00. Plaintiff alleges this figure constitutes the \$6,130.10 deposit with the addition of estimated tax withholdings.

143. On October 13, 2025, the principal office address for DRVM LLC on file with the State of Oregon was changed from 411 East Bonneville Avenue, Las Vegas, to 2275 Corporate Circle, Suite 220, Henderson, Nevada 89074, the new office location of the law firm Fabian & Clendenin APC. Oregon was the only state where DRVM LLC's principal place of business was updated to this new address.

144. This was the first address change for DRVM LLC after more than a decade of continuous listing at 411 Bonneville, the address appearing on Plaintiff's paystub and the central hub for the enterprise entities identified in Plaintiff's disclosures.

145. After the modification, the new Henderson address appeared on DRVM-related filings and on current employee pay materials, replacing the 411 Bonneville address mid-litigation.

146. No explanation was provided for the change.

11. Resulting Court Order and Procedural Posture

147. On November 24, 2025, the Court issued an order resolving Plaintiff's Petition to Compel Arbitration. The Court compelled arbitration solely against DRVM LLC and solely on the limited unpaid-wage-and-penalty dispute described in the original arbitration demand.¹⁹

148. The Court determined that because none of the other respondents—Sanofi-Aventis U.S. LLC, Chattem Inc., Quten Research Institute LLC, AMJ Services LLC, or the individual respondents—were signatories to the arbitration agreement, they could not be compelled to arbitrate under the petition. The order noted that a petition to compel arbitration

¹⁹ See Exhibit F, *Order Compelling Arbitration, Hollingsworth v. Sanofi-Aventis US et al.*, No. 3:25-CV-01342-AB (D. Or. Nov. 24, 2025).

was not the proper procedural vehicle for pursuing alter ego or piercing claims against non-signatory entities.

149. The Court therefore limited the compelled arbitration to a single respondent—DRVM LLC, a revoked shell without officers or operations—and left all other issues and entities for adjudication in this Court.

150. The Court’s order confirms that the remaining claims in this action—including fraud, fraudulent concealment, alter-ego liability, civil conspiracy, multi-forum obstruction, and issues arising from Plaintiff’s federal whistleblower submissions—cannot be resolved in arbitration and proceed exclusively here.

12. Multi-Forum Inconsistencies and Obstruction Across Arbitration, Federal Court, and the Department of Labor

151. By mid-2025, Plaintiff’s legal matters were pending simultaneously in three different forums, each addressing a distinct issue:

- JAMS Arbitration — the narrow unpaid-wage/penalty dispute;
- Federal Court — Plaintiff’s petition to compel arbitration and respective respondents’ obligations; and
- Department of Labor — retaliation claims under the Taxpayer First Act based on Plaintiff’s April 2025 IRS whistleblower disclosures.

152. Across these three forums, Defendants presented materially different narratives regarding (1) the employer’s identity, (2) the nature of the dispute, and (3) the July 1, 2025 deposit, resulting in no single tribunal receiving a consistent account of the underlying facts.

F. Inconsistent Representations Across Arbitration, Federal Court, and The Department of Labor

1. Arbitration: DRVM LLC as the Sole Employer and a “Small Wage Claim”

153. In arbitration, Defendants stated that DRVM LLC was the sole employer, that the dispute involved only an unpaid-wage balance of “\$637.15,” and that DRVM had already resolved the matter. DRVM’s July 16, 2025 arbitration filing did not disclose the July 1, 2025 deposit, did not identify any corporate officer, and did not reference Plaintiff’s IRS or SEC whistleblower submissions.

154. After Plaintiff amended the arbitration to include third-party entities based on the agreement’s third-party clause, Defendants did not appear for any upstream entity. All filings were routed exclusively through DRVM LLC, despite its dissolved status and absence of lawful corporate officers.

2. Federal Court: Defaults, Docket Maneuvers, and a Different Explanation of the Deposit

155. In federal court, Defendants described the matter as only a “\$637.15 wage claim,” and Fisher Phillips represented that DRVM had paid \$7,795 on July 1, 2025, arguing the wage claim was moot. This amount differed from the representation made in arbitration.

156. The Court ordered all nine respondents to be served. Six respondents never appeared. Defendants later filed ex parte communications and docket-correction motions that interpreted the Court’s September 4 order as eliminating all deadlines for the non-DRVM respondents.

157. The combination of defaults, partial appearances, and conflicting explanations regarding representation resulted in no upstream entity—Sanofi, Chattem, Quten, AMJ Services, or the beneficiaries of Basil Management Trust—appearing in the federal proceeding, preventing the Court from receiving information about the enterprise structure or the entities identified in Plaintiff’s whistleblower filings.

3. Department of Labor: Retaliation Framed as a Termination Dispute, and a Third

Version of the Deposit

158. In the Department of Labor proceeding, Defendants, while litigating through DRVM LLC, have stated that the adverse action was Plaintiff's December 2024 termination by DRVM LLC. This characterization differs from Plaintiff's position that the actionable retaliation stems from events following his April 2025 whistleblower disclosures regarding Sanofi, Chattem, and Quten.²⁰

159. In their initial disclosure, Defendants stated that the July 1, 2025 deposit constituted "proof of payment," a characterization not made in either arbitration or federal court.²¹

160. Defendants also identified Steven Dickert—trustee of Basil Management Trust—as the "CFO" of DRVM LLC, marking the first time any officer had been identified for DRVM in any forum after nearly a year of litigation. Basil Management Trust and Dickert are the same trust-and-trustee combination that created, managed, or appeared on corporate filings for several of the Sanofi-affiliated entities within the 411 E. Bonneville structure.

4. Combined Effect: No Forum Received a Complete or Consistent Account

161. As a result of the differing representations in arbitration, federal court, and the Department of Labor, no single forum received a consistent account of:

- the identity of the employer;
- the role of Sanofi, Chattem, and Quten;

²⁰ The Department of Labor docketed the Taxpayer First Act retaliation proceeding, *Hollingsworth v. DRVM LLC et al.*, on November 14, 2025, and subsequently ordered the parties to serve initial disclosures.

²¹ Defendants made this assertion through counsel, Fisher Phillips LLP, in initial disclosures served on Plaintiff dated December 5, 2025. See Exhibit G

- the nature and purpose of the July 1 deposit;
- the structure and control of the Direct Demo Entities; or
- the relationship between DRVM LLC, Basil Management Trust, AMJ Services, and the upstream entities.

162. Each forum was presented with a different explanation of the dispute, causing the wage claim to proceed in arbitration through a once revoked shell, the whistleblower retaliation claim to proceed through the same shell in the Department of Labor, and the broader enterprise-wide fraud and concealment allegations to proceed exclusively in this Court.

G. Effect of Multi-Forum Inconsistencies and Why the Remaining Claims Proceed in Federal Court

163. The events described above resulted in a situation where each forum received only a partial and inconsistent version of the underlying facts, leaving no tribunal able to assess the full scope of the enterprise, the identity of the employer, or the conduct that followed Plaintiff's whistleblower disclosures.

164. In arbitration, the matter was confined—by Defendants' representations and by the limits of the agreement—to an unpaid-wage dispute involving only DRVM LLC, a dissolved shell entity with no officers, no operations, and no capacity to address or disclose information concerning the upstream controllers.

165. In the Department of Labor, retaliation was framed by Defendants as a dispute concerning Plaintiff's December 2024 termination, rather than actions that occurred after Plaintiff's April 2025 IRS whistleblower submissions. The entity responding—DRVM LLC—was not the taxpayer identified in Plaintiff's IRS disclosures and was not the entity whose main practices were the subject of the IRS, SEC, or federal claims.

165. In federal court, defaults, conflicting appearances, and docket-correction motions prevented any response from the upstream entities—Sanofi, Chattem, Quten, AMJ Services, or the executives—and directed all activity through DRVM LLC. As a result, the Court did not receive information concerning the multi-layered structure, trust transfers, or the waves of state activations that occurred after Plaintiff’s protected activity.

166. Because the arbitration agreement governs only wage claims and binds only DRVM LLC, and because the Department of Labor proceeding addresses only retaliation under the Taxpayer First Act, neither forum can adjudicate the enterprise-level allegations concerning fraud, concealment, alter-ego liability, coordinated shell-entity use, or multi-forum inconsistencies. Defendants have further complicated these proceedings by offering materially different explanations in each tribunal—including in a congressionally mandated whistleblower proceeding where a dissolved shell entity was positioned to appear in place of the protected employers—thereby obscuring the facts and undermining the very federal whistleblower protections Congress enacted.

167. Accordingly, the remaining claims—arising from the alleged enterprise structure, the concealment of the employer’s identity, the issuance of false wage and tax documents, the use of dissolved and unregistered entities across multiple states, the waves of corporate reactivations following Plaintiff’s protected activity, and the conflicting accounts presented in three tribunals—proceed exclusively in this Court. The Defendants’ shifting representations across arbitration, federal court, and the Department of Labor have created a fragmented factual landscape that only this Court is positioned to evaluate comprehensively.

168. This action therefore addresses conduct and injuries that neither the wage arbitration nor the Department of Labor proceeding can remedy, including fraud, fraudulent

concealment, civil conspiracy, alter-ego liability, and the overarching enterprise structure that spanned more than a decade. The pattern of inconsistent statements and procedural maneuvering—including the use of a dissolved shell entity to appear in a Taxpayer First Act proceeding where federal whistleblower protections apply to Sanofi, Chattem, and Quten—underscores why the claims in this Complaint require judicial resolution beyond the narrow confines of arbitration or administrative review.

V. CAUSES OF ACTION

COUNT I – FRAUD

(Against Sanofi-Aventis U.S. LLC, Chattem Inc., Quten Research Institute LLC, AMJ Services LLC, Steven S. Dickert, and the Direct Demo Entities)

169. Plaintiff realleges paragraphs 1–168.

170. Defendants, acting jointly and through the Direct Demo Entities, represented that DRVM LLC, MK Marketing LLC, MMB Marketing LLC, and DRC Demo LLC were Plaintiff’s employer and the entities responsible for payroll, tax reporting, and compliance.

171. These representations appeared in onboarding documents, paystubs, W-2s, wage statements, and payroll portals issued to Plaintiff.

172. At the time these representations were made, DRVM and the other Direct Demo Entities were dissolved, revoked, or unregistered in most states where the workforce operated and did not possess officers, employees, HR personnel, or facilities to perform employer functions.

173. Defendants Sanofi, Chattem, Quten, and AMJ Services LLC funded and directed payroll; supervised scheduling, training, and operations; managed product distribution; and exercised day-to-day control over the workforce.

174. Plaintiff relied on the employer designations appearing on wage and tax documents in performing work, reporting income, and evaluating employment rights.

175. The employer designations and payroll records were material to Plaintiff's understanding of who employed him and who bore responsibility for wages, taxes, and legal compliance.

176. Plaintiff suffered financial, tax, and legal harms, including issuance of inaccurate wage and tax documents, reliance on incorrect employer information, delays in wage payments, and the inability to identify or contact a responsible employer.

COUNT II – FRAUDULENT CONCEALMENT

(Sanofi-Aventis U.S. LLC, Chattem Inc., Quten Research Institute LLC, AMJ Services LLC,
Steven S. Dickert)

177. Plaintiff realleges paragraphs 1–176.

178. Defendants concealed the identity of the entities funding, directing, and controlling the workforce by routing all payroll and employment records through dissolved or unregistered shell entities.

179. Defendants did not disclose that payroll for Qunol and Zena products was commingled and funded through lump-sum inputs processed through DRVM's ADP account.

180. Defendants did not disclose the unified operational hub at 411 East Bonneville Avenue, where the Direct Demo Entities, related intellectual-property entities, and Zena Nutrition were registered.

181. Defendants did not disclose the role of Basil Management Trust in owning and transferring the entities holding liabilities and assets.

182. Defendants had superior access to this information and exclusive control over corporate filings, trust records, payroll systems, and address changes.

183. Plaintiff could not have discovered the concealed facts during his employment because DRVM, AMJ, and MK Marketing presented themselves as independent employers on all documentation.

184. Plaintiff suffered harm as a result of relying on incomplete and inaccurate information regarding employer identity, payroll accuracy, and legal accountability.

COUNT III – CIVIL CONSPIRACY

(Against All Defendants)

185. Plaintiff realleges paragraphs 1–184.

186. Defendants agreed and acted jointly to structure, operate, and maintain a multi-entity enterprise through the Direct Demo Entities to conceal the identity of the entities exercising control over the workforce.

187. The agreement is evidenced by shared addresses, identical officers, coordinated entity formations and reinstatements, unified payroll inputs, and synchronized corporate activity.

188. Defendants undertook overt acts in furtherance of the agreement, including issuing wage and tax documents through dissolved entities, reactivating DRVM LLC during litigation, transferring entities into and out of trusts, and presenting inconsistent explanations across forums.

189. Plaintiff suffered harm resulting from the coordinated acts undertaken by the Defendants.

COUNT IV – ALTER-EGO / PIERCING THE CORPORATE VEIL

(Against Sanofi-Aventis U.S. LLC, Chattem Inc., Quten Research Institute LLC, AMJ Services LLC, Steven S. Dickert)

191. Plaintiff realleges paragraphs 1–190.

192. DRVM LLC, MK Marketing LLC, MMB Marketing LLC, and DRC Demo LLC lacked independent officers, employees, capitalization, or business operations.

193. Upstream controllers Sanofi, Chattem, Quten, AMJ Services LLC, and Steven S. Dickert as Trustee of Basil Management Trust, exercised complete domination and control over these entities' finances, payroll, HR functions, and operational decisions.

195. Funds for wages, commissions, and operational expenses originated from upstream controllers and were processed through DRVM's payroll account.

196. The Direct Demo Entities did not maintain separate financial records or independent business activity and served only as nominal employers on paystubs and tax documents.

197. Adherence to the corporate form would sanction a fraud or injustice by permitting the upstream controllers to avoid liability for wages, tax reporting, and employer obligations.

COUNT V – SUCCESSOR LIABILITY

(Against Sanofi-Aventis U.S. LLC, Chattem Inc., Quten Research Institute LLC)

198. Plaintiff realleges paragraphs 1–197.

199. Following Sanofi's 2023 acquisition of Quten, corporate filings show transfers of entities, intellectual property, and product-line companies from Basil Management Trust and related entities into Sanofi or its subsidiaries.

200. Sanofi and Chattem continued the same business operations, workforce structure, and payroll funding as Quten and the Direct Demo Entities.

201. The operational structure, workforce control, supply chain, and payroll practices remained integrated and unchanged after the acquisition.

202. Successor liability applies because the successor entities continued the business enterprise without interruption and retained the operational structure giving rise to Plaintiff's injuries.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff Jorden Hollingsworth respectfully requests that judgment be entered in his favor and against Defendants Sanofi-Aventis U.S. LLC, Chattem Inc., Quten Research Institute LLC, AMJ Services LLC, Steven S. Dickert as Trustee of Basil Management Trust, and all other Direct Demo Entities named herein, jointly and severally, and that the Court grant the following relief:

1. Declaratory Relief

A. A declaration that, during the period relevant to this Complaint, Plaintiff was jointly employed by the upstream controller Defendants (including Sanofi-Aventis U.S. LLC, Chattem Inc., Quten Research Institute LLC, and AMJ Services LLC) and the Direct Demo Entities, and that the shell entities appearing on Plaintiff's wage and tax documents acted as their instrumentalities and alter egos.

B. A declaration that Defendants' conduct, as alleged herein, constitutes fraud, fraudulent concealment, civil conspiracy, and alter-ego misuse of corporate form.

C. A declaration that DRVM LLC, MK Marketing LLC, MMB Marketing LLC, DRC Demo LLC, and related Direct Demo Entities were undercapitalized, lacked independent operations, and were used to conceal the identity of the true controlling entities.

2. Compensatory and Consequential Damages

An award of compensatory damages in an amount to be proven at trial, including but not limited to:

A. Economic losses arising from the issuance of false or inaccurate wage statements, W-2s, and tax documents;

B. Losses, expenses, and out-of-pocket costs incurred in attempting to identify a responsible employer, correct payroll inaccuracies, and protect Plaintiff's legal and tax position;

C. Any unpaid wages, penalties, or wage-related amounts that remain owing to Plaintiff to the extent not fully resolved or remedied in other proceedings; and

D. Consequential damages flowing from Defendants' fraudulent and concealed enterprise structure and multi-forum conduct.

3. Restitution and Disgorgement

An order requiring Defendants to make restitution and to disgorge any unjust enrichment obtained through:

A. The use of dissolved, revoked, or unregistered entities as nominal employers;

B. The commingling and concealment of wages, commissions, and hours through unified payroll inputs; and

C. The continued operation of the enterprise structure that concealed the identity of the entities funding and controlling the workforce.

4. Punitive / Exemplary Damages

An award of punitive and/or exemplary damages in an amount sufficient to punish and deter Defendants and others from engaging in similar fraud, concealment, and misuse of shell entities and trust structures.

5. Equitable and Injunctive Relief

A. An order requiring Defendants to provide a full accounting of:

- all entities that funded, processed, or reported Plaintiff's wages and commissions;

- all corporate, trust, and address changes affecting those entities during the period relevant to this Complaint; and
 - all payments, wage statements, and tax documents issued in Plaintiff's name.
- B. An order requiring Defendants to reissue and/or correct Plaintiff's wage statements, W-2s, and related tax documents to accurately reflect:
- the true employing and controlling entities; and
 - the correct characterization and amounts of wages, commissions, and hours attributed to Plaintiff.
- C. A permanent injunction prohibiting Defendants from:
- using dissolved, revoked, or unregistered entities as nominal employers for purposes of issuing wage and tax documents; and
 - using shell entities or trust arrangements in a manner that conceals the identity of the true employer or controlling entities with respect to Plaintiff.
- D. To the extent permitted by law, such further equitable relief as is necessary to unwind or neutralize the effects of the enterprise structure alleged in this Complaint as it pertains to Plaintiff.

6. Alter-Ego / Veil-Piercing Relief

An order piercing the corporate veil of DRVM LLC, MK Marketing LLC, MMB Marketing LLC, DRC Demo LLC, and related Direct Demo Entities and holding Sanofi-Aventis U.S. LLC, Chattem Inc., Quten Research Institute LLC, AMJ Services LLC, Steven S. Dickert as Trustee of Basil Management Trust, and any other appropriate upstream entities liable for the obligations and misconduct alleged herein.

7. Successor Liability Relief

A determination that Sanofi-Aventis U.S. LLC, Chattem Inc., and Quten Research Institute LLC are liable as successors for the obligations and liabilities of entities whose operations, assets, and workforce they continued, including entities associated with the Direct Demo enterprise structure relevant to Plaintiff's claims.

8. Pre- and Post-Judgment Interest

An award of pre-judgment and post-judgment interest at the maximum rates allowed by law on all monetary relief awarded.

9. Costs and Fees

An award of Plaintiff's costs of suit, including filing fees, service costs, expert-witness expenses, and, to the extent permitted by law, reasonable attorneys' fees and litigation expenses.

10. Further Relief

Such other and further legal or equitable relief as the Court may deem just and proper under the circumstances.

VII. JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

Respectfully submitted,

Dated: December 11, 2025

s/ Jorden Hollingsworth

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