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18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA

20 Jeff Pokorny and Larry Blenn  
21 on behalf of themselves and those similarly  
situated,  
22 Plaintiffs,  
23 v.  
24 Quixtar, Inc., James Ron Puryear Jr., Georgia  
Lee Puryear, and World Wide Group, L.L.C.,  
25 Britt Worldwide L.L.C., American Multimedia  
26 Inc., Britt Management, Inc., Bill Britt and  
Peggy Britt,  
27 Defendants.

CASE NO. \_\_\_\_\_  
COMPLAINT AND DEMAND FOR JURY TRIAL  
CLASS ACTION

FILED

JAN 10 2007

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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Filing

MC

C 07 0201

BOIES, SCHILLER & FLEXNER LLP  
OAKLAND, CALIFORNIA

**CLASS ACTION COMPLAINT**

1  
2 Plaintiffs Jeff Pokorny and Larry Blenn on behalf of themselves and those similarly  
3 situated, sue defendants Quixtar, Inc. ("Quixtar"), Ron Puryear, Georgia Lee Puryear, World  
4 Wide Group, L.L.C., Britt Worldwide L.L.C., American Multimedia Inc., Britt Management,  
5 Inc., Bill Britt and Peggy Britt, and allege as follows:  
6

7 **Nature of Action**

8 1. This is an action to recover damages caused by defendants' operation of a  
9 pyramid scheme. This pyramid scheme is fraudulent because it induces individuals to invest in  
10 products and marketing tools and to recruit new victims into the scheme with the false promise  
11 of enormous profits. The pyramid scheme here consists of two separate, but related  
12 businesses: Quixtar, Inc., a multilevel marketing business, and the "Kingpins Corporations,"  
13 which are a group of businesses that sell purported motivational materials and services to  
14 distributors of Quixtar's products. New entrants into the pyramid scheme are effectively  
15 required to invest money to buy products from Quixtar and "tools and functions" from the  
16 "Kingpin Corporations." Because Quixtar distributors (euphemistically referred to as  
17 "Independent Business Owners" (or "IBO's" by Quixtar)) most often do not sell products to  
18 consumers who are not also distributors, they can obtain a return on their investment in the  
19 Quixtar program only by recruiting new distributors who will then buy products (and recruit  
20 more distributors who will buy products), which purchases result in "bonuses" to the recruiting  
21 distributor.

22 **Type of Action**

23 2. This is an action brought, on behalf of a national class of distributors, pursuant  
24 to the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1961 *et seq.* ("RICO")  
25 and, on behalf of a California class of distributors, pursuant to the California Business and  
26 Professions Code §§ 17200, *et seq.* and 17500, *et seq.*  
27  
28

Parties

1  
2           3.       Plaintiff Jeff Pokorny ("Pokorny") is, and at all material times was, an  
3 individual who resides in the county of Alameda, in the state of California. Pokorny entered  
4 into a Registration Agreement with Amway and became an Amway distributor on or about  
5 October 1994. He later became a Quixtar distributor when the Amway organization launched  
6 Quixtar, at which time all Amway distributors in the United States were converted to Quixtar  
7 distributors. While a distributor, Pokorny was in the World Wide DreamBuilders' "line of  
8 sponsorship" run by defendants Ron Puryear and Georgia Lee Puryear. Pokorny operated his  
9 Quixtar distributorship under the name "Pokorny Enterprises."

10  
11           4.       Plaintiff Larry Blenn ("Blenn") is, and at all material times was, an individual  
12 who resides in the county of San Joaquin, in the state of California. Blenn entered into the  
13 Quixtar Registration Agreement with Quixtar and became a Quixtar distributor on or about  
14 January 2005. While a distributor, Blenn was in the World Wide DreamBuilders' "line of  
15 sponsorship" run by defendants Ron Puryear and Georgia Lee Puryear. Blenn operated his  
16 Quixtar distributorship under the name "Blenn Enterprises."

17  
18           5.       Defendant Quixtar, Inc. ("Quixtar") is, and at all relevant times was, a  
19 corporation organized under the laws of the state of Virginia, with its principal place of  
20 business in the state of Michigan, and doing business regularly throughout the United States,  
21 including in the state of California. Quixtar transacts its business in the Northern District of  
22 California in accordance with 18 U.S.C. § 1965(a) and (b) and California Code of Civil  
23 Procedures § 410.10. Quixtar is the successor-in-interest of the Amway Corporation  
24 ("Amway"), which did business in the state of California and in this District.  
25

26           6.       Defendant World Wide Group, L.L.C. ("World Wide Group") is, and at all  
27 relevant times was, a corporation organized under the laws of the state of Washington, with its  
28

1 principal place of business in the state of Washington and doing business regularly in the state  
2 of California. World Wide Group transacts its business in the Northern District of California in  
3 accordance with 18 U.S.C. § 1965(a) and (b) and California Code of Civil Procedure § 410.10.  
4 Defendant World Wide Group is in the “tools and functions” business and sells its products to  
5 distributors, including plaintiff. World Wide Group also does business under the name of  
6 World Wide Dream Builders.  
7

8 7. Defendant Ron Puryear is, and at all relevant times was, an individual residing  
9 in the county of Spokane, in the state of Washington. Defendant Ron Puryear is an owner of  
10 World Wide Dream Builders and/or World Wide Group and individually does business in  
11 California. Ron Puryear transacts his business and promotes the World Wide Dream Builders  
12 “line of sponsorship,” as explained further herein, in the Northern District of California in  
13 accordance with 18 U.S.C. § 1965(a) and (b) and California Code of Civil Procedure § 410.10.  
14

15 8. Defendant Georgia Lee Puryear is, and at all relevant times was, an individual  
16 residing in the county of Spokane, in the state of Washington. Defendant Georgia Lee Puryear  
17 is an owner of World Wide Dream Builders and/or World Wide Group, which does business  
18 throughout the state of California and individually does business in California. Georgia Lee  
19 Puryear transacts her business and promotes the World Wide Dream Builders “line of  
20 sponsorship,” as explained further herein, in the Northern District of California in accordance  
21 with 18 U.S.C. § 1965(a) and (b) and California Code of Civil Procedure § 410.10.  
22

23 9. Defendant Britt Worldwide L.L.C. (“Britt Worldwide”) is, and at all relevant  
24 times was, a corporation organized under the laws of the state of Washington, with its principal  
25 place of business in the state of Washington and doing business regularly throughout the state  
26 of California. Defendant Britt Worldwide is the upline “line of sponsorship” to defendants  
27 World Wide Group, Ron Puryear and Georgia Lee Puryear. In other words, defendants World  
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