

**From:** Braz, Madison <Madison.Braz@partner.vermont.gov>  
**Sent:** Friday, October 4, 2019 3:05 PM  
**To:** derek@sevendaysvt.com  
**Subject:** RE: PRA Request

Dear Derek Brouwer,

Please see the attached file in response to your public records act request dated October 2, 2019.

Sincerely,

Madison Braz

**THOMAS J. DONOVAN, JR.**  
ATTORNEY GENERAL

**JOSHUA R. DIAMOND**  
DEPUTY ATTORNEY GENERAL

**SARAH E. B. LONDON**  
CHIEF ASST. ATTORNEY  
GENERAL



**ADDRESS REPLY TO:**  
**CONSUMER ASSISTANCE PROGRAM**  
109 State Street  
Montpelier, Vt 05609  
website: ago.vermont.gov/cap  
e-mail: ago.cap@vermont.gov

**STATE OF VERMONT**  
**OFFICE OF THE ATTORNEY GENERAL**  
**PUBLIC PROTECTION DIVISION**  
TEL: 1-800-649-2424  
FAX: (802) 304-1014

October 4, 2019

*Via email to [derek@sevendaysvt.com](mailto:derek@sevendaysvt.com).*

Derek Brouwer  
*Seven Days*

Re: Public Records Request

Dear Derek Brouwer,

I write in response to your Public Records Act request dated October 2, 2019, a copy of which is enclosed for your convenience (PRA-CAP002).

Attached you will find the documents pertaining to your request.

Some material in the records has been redacted consistent with the obligations of this office under the Access to Public Records Act to protect individual privacy. In particular, we have redacted personal information of third parties to protect personal privacy of persons, particularly vulnerable persons, involved in the process. See *Trombley v. Bellows Falls Union High School Dist. No. 27*, 160 Vt. 101, 110 (1993).

Under 1 V.S.A. § 318(c)(1), you have a right to appeal from any denial of access. Such appeal should be in writing.

Sincerely,

A handwritten signature in black ink, appearing to read 'Madison Braz', written over a long horizontal line.

Madison Braz  
Consumer Assistance Program  
Office of the Attorney General  
State of Vermont

**From:** Derek Brouwer <[derek@sevendaysvt.com](mailto:derek@sevendaysvt.com)>  
**Sent:** Wednesday, October 2, 2019 10:27 AM  
**To:** Curtis, Christopher <[Christopher.Curtis@vermont.gov](mailto:Christopher.Curtis@vermont.gov)>  
**Subject:** chain-distributor schemes

Hi Christopher,

I hope you're well. I'm reporting on a Vermont individual with ties to a well-known ponzi scheme. I understand Vermont also has a state law pertaining to "chain distributor schemes," sometimes known as multi-level or network marketing.

-Are you able to discuss the state's law, and what it's been interpreted to encompass?  
-Do you know of any prosecutions in the last 10 years under the statute?

I'd also like to request any CAP complaints the state has received naming Valentus, Zeek, Trudy Gilmond or Kellie King.

Feel free to give me a call with any questions. I'm at 802-999-3347.

Thanks,  
Derek

--

// SEVEN DAYS //  
:: Derek Brouwer  
:: Staff Writer  
:: <http://sevendaysvt.com>  
:: desk: 802-865-1020 x23  
:: mobile: 802-999-3347

Fax: [REDACTED]

Date: 5/30/12

Re: Attached (3) documents

Name: DR. Blight  
[REDACTED]

Williamstown, VT  
05679

Phone: [REDACTED]

Email: [REDACTED]

<b>Received at CAP</b>
MAY 31 2012
Complaint #:
Date Scanned:

this scheme is being passed around  
 state employees. My research shows  
 that it is a "pyramid scheme". I  
 know of many people ready to jump  
 on board but want your opinion.

Hotmail - [Redacted]

Windows Live™ Hotmail (67) Messenger (0) SkyDrive | MSN

Hotmail

Inbox (67)

Folders

Junk (699)

Drafts (5)

Sent

Deleted (235)

New folder

Quick views

Documents

Flagged

Photos

Shipping updates (1)

New category

Messenger

7 invitations

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Fwd: Re: Hi Pat!



To: donna blight  
HSN

Beading frenzy | designer sale

Hurry! Last Chance to Save an Extra 15...

Portrait Bundle

Last Chance! Memorial Day Deals End at...

Lost a message? When you recover deleted messages, we bring back as many as we can. Learn more...  
had told me in time, you can make a lot of money at this...  
312 messages asked anything our yet? Page 5 of 9 | Go to

----- Forwarded message from Rebecca Baker -----

Date: Sat, 26 May 2012 09:43:55 -0400  
From: Rebecca Baker  
Reply-To: Rebecca Baker  
Subject: Re: Hi Pat!  
To: [Redacted]

I totally understand the confusion and skepticism! So far, I am seeing a lot of progress which is why it is so exciting! I am currently earning around \$6 per day which doesn't sound like a lot but multiply that by 30 days and it's \$180 per month. And if it keeps progressing like it has been, I could see that doubling and doubling in no time! Right now I am taking all that I make and putting it into building my business so there is not any real profit yet once I get going I will take earnings for myself.

Here is a link to a webinar that explains how this business works in more detail:  
<http://www.yougetpaidtoadvertise.com/beckybl031/Webinar.aspx>

The best way to see how it works is to join for free and watch points grow. Keep me posted on whatever you decide. Have you listened in on any of the conference calls?

Hope you are well. Did you hear Aimee is getting married today? Wow. I can't believe it, I hope she is happy!

Talk to you soon!

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<http://sn132w.snt132.mail.live.com/?ru=inbox>

5/30/2012

Hotmail - [Redacted]

Windows Live™ Hotmail (67) Messenger (0) SkyDrive | MSN

Hotmail

Inbox (67)

Folders

Junk (699)

Drafts (5)

Sent

Deleted (235)

New folder

Quick views

Documents

Flagged

Photos

Shipping updates (1)

New category

Messenger

7 invitations

Loading...

New Reply Reply all Forward Delete Junk Mark as Move to Categories

Fwd: location of company

Beyond the Rack

Lawrence Hamilton

To Bob Blight, donna blight

eHarmony Specials

Save big on shipping - Get your message

Re: reply

Your Extasia Order

This Friday! eHarmony's Memorial Day...

Lost a message? When you recover deleted messages, we bring back as many as we can. Learn more

----- Forwarded message from Rebecca Baker -----

Page 9 of 9 | Go to

312 messages

Date: Mon, 14 May 2012 12:36:53 -0400

From: Rebecca Baker

Reply-To: Rebecca Baker

Subject: location of company

To: [Redacted]

About Us

Zeekier and ZeekRewards are owned by Rex Venture Group LLC, a subsidiary of Lighthouse America, US (NV) company. The company established on June 24, 1997 and adopted the d/b/a Lighthouse later that year.

Our headquarters is located in the beautiful town of Lexington USA on the I-85 corridor connection Charlotte and Raleigh. Rex Venture Group, LLC is a Nevada-based limited liability company that got started and has operated as a company in good standing for 14 years under the d.b.a Lighthouse America.

ZeekRewards provides a world-class Affiliate Services Department dedicated web server farm, operated and maintained by Interne Dynamo, Inc is located in Miami, Florida, USA.

----- End forwarded message -----

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5/30/2012



Hotmail -

Windows Live™ Hotmail (67) Messenger (0) SkyDrive | MSN

**Received at CAP**  
MAY 31 2012  
Complaint #:  
Date Scanned:

Hotmail

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Folders

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New | Reply Reply all Forward | Delete Junk Mark

**Fwd: Watch this!!**

To donna blight, Bob Bright  
**eHarmony Specials**

Save big on shipping - See how to messages

Re: reply

Your Extasia Order

**This Friday! eHarmony's Memorial Day...**

Lost a message? When you recover deleted messages, we bring back as many as we can. Learn more here.

312 messages check out these sites and let me know what you think. I'm in Goko. Baker from the office got me looking at this as a source of employment income. It sounds confusing to me, but appears to really be legitimate. Seems that this company is getting and stronger all the time and has become the latest rage in money. Becky seemed really excited about it and has already started to make a little money.. I guess the more you put into this, the more you can make. Anyway look at all these e-mails/video's etc that Becky has sent me and let me know if you think it will pay off for us. Love you, Mcm

----- Forwarded message from Rebecca Baker -----

Date: Mon, 14 May 2012 11:15:37 -0400  
From: Rebecca Baker  
Reply-To: Rebecca Baker  
Subject: Watch this!!  
To: [Redacted]

<https://www.yougetpaidtoadvertise.com/Zeek101.aspx>

If you're interested go to [www.beckybl031.zeekrewards.com](http://www.beckybl031.zeekrewards.com) to sign up. You can sign up for free just to see how it works then upgrade if you decide if you want to sign as a silver, gold, or diamond affiliate.

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Also, you can check out the links I posted on facebook or you can listen to a conference call/ web conference which takes place

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<http://sn132w.snt132.mail.live.com/?rru=inbox>

5/30/2012

From: Cadmin  
Sent: Saturday, June 02, 2012 3:20 PM  
To: [REDACTED]  
Subject: Pyramid Scheme Inquiry

Dr. Blight,

Thank you for your inquiry to the Consumer Assistance Program. We will include the emails you have provided as in informational complaint. As such, the information will be available for the Attorney General's Office to review for six years.

I researching information about this business, it appears the business claims to offer a penny auction as well as a multi-level marketing program. You may wish to share with your friends and coworkers that there are a few areas of concern. The Federal Trade Commission issued an alert, outlining the cautions of Penney Auctions. As a newer type of auction, there are many areas that consumers generally do not understand about the auction bidding process. Here is a link to the alert:  
<http://www.ftc.gov/bcp/edu/pubs/consumer/alerts/alt041.shtm>

The other area of concern is that pyramid schemes are often disguised by the guise of multi-level marketing programs. In pyramid schemes, most of the individuals recruited end up losing money. Pyramid schemes work by promising persons an opportunity to make money and incur incentives by recruiting others into the program, and then others do the same, creating an endless chain of recruitment. Participants usually spend more than they receive and eventually drop out. –Ultimately losing any funds invested. Here is more detailed information on how Pyramid Schemes work:  
<http://www.ftc.gov/speeches/other/dvimf16.shtm>

I looked online and it appears that Vermont Human Resources offers more information as to state employees' internet use policies relative to pyramid schemes. You may consider contacting Human Resources for additional information about the policy. Here is a link to their website:  
[http://humanresources.vermont.gov/sites/dhr/files/pdf/policies\\_procedures/DHR-Policy\\_Manual.pdf](http://humanresources.vermont.gov/sites/dhr/files/pdf/policies_procedures/DHR-Policy_Manual.pdf)

Thank you for your inquiry and best of luck.

Thanks,

Crystal Grewe  
Consumer Advisor

Vermont Attorney General's Office  
Consumer Assistance Program  
146 University Place  
Burlington, VT 05405  
(802) 656-3183  
(802) 656-1423 (FAX)  
[www.uvm.edu/consumer](http://www.uvm.edu/consumer)



Sent: Wednesday, July 25, 2012 10:16 PM  
To: consumer@uvm.edu  
Subject: Butler Consumer Complaint Form

Below is the result of your feedback form. It was submitted by  
( [REDACTED] ) on Wednesday, July 25, 2012 at 22:15:54

---

email: [REDACTED]

Name: Karen L. Butler

Street: [REDACTED]

City: Randolph

State: VT

ZIP: 05060

Phone: [REDACTED]

Senior: No

Irene: No

Business Name: Rex Venture Group, LLC Trading AS Lighthouse America Zeek  
Rewards

Business Street: 803 W. Center Street

Business City: Lexington

Business State: NC

Business ZIP: 27292

Business Phone: 1-647-995-5532

Complaint: I got a notification letter in the mail today (7/25/12)saying I won \$56,000. Letterhead reads "Reliable Research and Marketing Sweekstakes, Inc." Enclosed was a real looking check for \$3500.00 "to assist me" in paying the processing and insurance fees which they asked me to send them \$2500.00 to cover. Printed postage on envelope makes it appear it is from Canada. I realized right away this is a scam and decided to report it.

Loss: \$0

Relief Requested: Find these scheming theives and bring them to justice!

Found By: friend

---

PRA-CAP008

2019-10-04



McGuireWoods LLP  
201 North Tryon Street  
P.O. Box 31247 (28231)  
Charlotte, NC 28202  
Phone: 704.343.2000  
Fax: 704.343.2300  
www.mcguirewoods.com

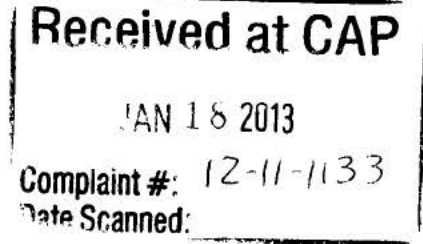
Matthew J. Hoefling  
Direct: 704.343.2054

McGUIREWOODS

mhoefling@mcguirewoods.com  
Direct Fax: 704.444.8884

January 14, 2013

Jonathan Oppenheim, Consumer Advisor  
Office of Attorney General of Vermont  
Consumer Assistance Program  
146 University Place  
Burlington, VT 05405



Re: Rex Ventures Group, LLC

To [REDACTED]

On August 17, 2012, Ken Bell of my firm was appointed receiver of Rex Ventures Group, LLC d/b/a Zeekrewards.com by the Honorable Graham Mullen, United States District Court Judge for the Western District of North Carolina. As a result of the appointment, we now represent the interests of Rex Ventures Group and therefore I am responding on behalf of the company to the letter submitted by your office on November 26, 2012, complaint no. 12-11-1133 (Theodore C. Palmer). As receiver, we are working diligently to recover company assets, wind down operations, and ultimately, address claims made by investors of Rex Ventures Group, among other responsibilities. We anticipate the process will take months, if not longer. Given our recent appointment and the complexities involved, we are not at this time in a position to respond more fully to your letter or to the complaints set forth therein.

Should you have any questions going forward regarding Rex Ventures Group or the ongoing legal proceedings, I recommend that you contact either the Securities Exchange Commission or the United States Attorney's Office for the Western District of North Carolina, per the contact information below. You may also visit the receivership website at [zeekrewardsreceivership.com](http://zeekrewardsreceivership.com) for updates and developments.

Brian M. Privor  
U.S. Securities and Exchange Commission  
100 F. Street, N.E.  
Washington, DC 20549  
202.551.4645

January 14, 2013  
Page 2

Mark O'Dulio  
U.S. Attorney's Office - Western District of North Carolina  
227 West Trade St., Suite 1650  
Charlotte, NC 28202  
704.344.6222

Sincerely,



Matthew J. Hoefling  
On behalf of Ken Bell, Receiver

Sent: Monday, November 19, 2012 7:57 PM  
To: consumer@uvm.edu  
Subject: Palmer Consumer Complaint Form

Below is the result of your feedback form. It was submitted by  
( [REDACTED] ) on Monday, November 19, 2012 at 19:57:21

---

email: [REDACTED]

Name: Theodore c Palmer

Street: [REDACTED]

City: Hinesburg

State: VT

ZIP: 05461

Phone: [REDACTED]

Senior: No

Irene: No

Business Name: rexventure group

Business State: NC

Business Phone: closed

Business E-mail: rexventuregroud@gmail.com

Complaint: On 6/22/12 I purchased [REDACTED] worth of bids from zeekrewards through a local affiliate in which they also made the same purchase . With the promise of nearly 2% daily return on money in my account . On or around 8/17/12 the SEC siezed all assets and appointed a receiver to investigation. It has been almost three months with no details . There are several people I know that made the same or smaller purchase so I am very surprised that this is the first complaint . I would like to see the AG represent all the vermonters that are out hundreds of thousands of dollars to make sure we are reimbursed .

Loss: [REDACTED]

Relief Requested: [REDACTED]

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