STATE OF NORTH CAROLINA

COUNTY OF DURHAM

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
26-CVS-_____

LUKE FARLEY, in his capacity as COMMISSIONER OF LABOR OF THE STATE OF NORTH CAROLINA,

Plaintiff,

v.

CJF AMERICA, INC., D/B/A THE COURTNEY JORDAN FOUNDATION, *and any successors*, COURTNEY JORDAN GROUP, INC., *and any successors,* CJGRPINC FOUNDATION, INC., *and any successors,* COURTNEY JORDAN, NICHOLAS GALLARDO, KRISTEN PICOT, and RHODA HORMENOO.

Defendants.

COMPLAINT

JURY TRIAL DEMANDED

NOW COMES **Plaintiff**, Luke Farley, in his official capacity as Commissioner of Labor of the State of North Carolina, by and through the undersigned counsel, pursuant to the North Carolina Wage and Hour Act, N.C. Gen Stat. § 95-25.1 *et seq*. (the "Act"), to recover unpaid wages and interest thereon, to recover liquidated damages, to enjoin violations of the Act, to restrain the withholding of wages due under the Act, and to recover attorney fees and other costs associated with enforcement of the Act. Plaintiff, on behalf of thirteen (13) employees, complaining of Defendants, CJF America, Inc., d/b/a the Courtney Jordan Foundation, and any successor business entities thereto, Courtney Jordan Group, Inc., and any successor business entities thereto, CJGRPINC Foundation, Inc., and any successor business entities thereto, and Courtney Jordan, Nicholas Gallardo, Kristen Picot, and Rhoda Hormenoo, individually, jointly, and severally, alleges as follows:

GM

Electronically Filed Date: 11/18/2026 9:21 AM Durham Superior Court County Clerk of Superior Court

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff, Luke Farley, is the duly elected Commissioner of Labor for the State of North Carolina, whose office and primary place of business is in Wake County, North Carolina. Pursuant to N.C. Gen. Stat. § 95-25.16, Plaintiff is charged with enforcement of the Act.

2. Pursuant to N.C. Gen. Stat. § 95-25.22(c), the Commissioner of Labor may maintain an action against an employer who violates the provisions of the Act at the request of the employees affected by the employer's violation of the Act. Plaintiff received signed authorizations from thirteen (13) employees of Defendants to assert an action against Defendants on their behalf. Plaintiff received signed authorizations from the following employees:

a. Angela Brigman

b. Asia Brown

c. Cherisse Collins

d. D'Nesha Jones

e. Sydney Jones

f. Blair Huger

g. Courtney Ingram

h. Takiyah Knight

i. June McKithen

j. Erica Medlin

k. Andjelani Mubenga

l. Kendra Pressley

m. Brianna Rivers

3. Pursuant to N.C. Gen. Stat. §§ 95-25.22 and -25.24, Plaintiff has standing to file

this action on behalf of the above-named employees.

4. This court has jurisdiction pursuant to N.C. Gen. Stat. §§ 7A-240 and -243 as the amount in controversy exceeds $25,000.

5. This court has personal jurisdiction over the corporate Defendants as the corporations are non-profit organizations organized under North Carolina law and perform substantial operations in North Carolina.

6. This court has personal jurisdiction over the individual Defendants as the individuals were employed to work in their capacities for the CJF America, and more specifically the summer camp associated with CJF America, which was in Durham, North Carolina.

7. Venue is proper in this court as it is the county in which the summer camp was located.

8. Upon information and belief, Defendants Jordan, Gallardo, Picot, and Hormenoo are of legal age, and are under no legal disability.

COURTNEY JORDAN/THE COURTNEY JORDAN FOUNDATION/COURTNEY JORDAN INC./COURTNEY JORDAN GROUP, INC./CJGRPINC FOUNDATION, INC. (EXHIBIT A)

9. There are multiple websites associated with Jordan, Gallardo, Picot, and Hormenoo that reference "The Courtney Jordan Foundation." Upon information and belief, "The Courtney Jordan Foundation" is not a registered corporation or as an assumed name with the North Carolina Secretary of State.

10. Upon information and belief, The Courtney Jordan Foundation is used interchangeably and indistinguishably by Defendants as the collection or portfolio of Courtney Jordan companies. Hereinafter, all companies will be referred to as the "Enterprise" when referring to any and all companies under this umbrella.

11. Upon information and belief, the parent company of the Enterprise is Courtney

Jordan Group, Inc. (hereinafter "CJ Group"). Courtney Jordan (hereinafter "Jordan") founded the CJ Group on **July 15, 2011**. Jordan noted "Legalzoom.com, Inc." as the incorporator and United States Corporation, Inc., as the registered agent for CJ Group. CJ Group's principal place of business was identified as 214 Moline Street, Durham, NC 27707, and its registered office was listed as 6135 Park South Road, Charlotte, NC 28210.

12. Upon information and belief, Jordan was summarily ejected from 214 Moline Street on **April 18, 2012**.

13. Upon information and belief, Jordan moved to 508 Rippling Stream Road, Durham, NC 27712, thereafter. Upon information and belief, Jordan was summarily ejected again on **March 22, 2013.**

14. Upon information and belief, the CJGRPINC Foundation, Inc., was formed on **July 21, 2015**, under the laws of North Carolina. The CJGRPINC Foundation, Inc., is a dissolved non-profit corporation. The incorporator of CJGRPINC Foundation, Inc., was Mandee Woodard, who now serves as the Executive Vice President of Business Affairs at Neyius, Inc. (another company that is a part of the Enterprise). The street address and registered agent address for CJGRPINC Foundation, Inc., was 801 Gilbert Street, Durham, NC 27701. The purpose of the non-profit corporation was listed to be charitable, educational, and literary.

15. On **September 10, 2015**, the Vice President of Program Directors for CJ Group filed an amendment with the North Carolina Secretary of State amending CJ Group's purpose as follows:

> "Said organization is organized exclusively for charitable, religious, educational, and scientific purposes, including:
>
> A. Providing assistance and services to members of the public that promote: family value; youth development; criminal record prevention; behavioral health; education; child enrichment; community enrichment; fair housing; community mediation; homeless prevention; disability assistance; and any and all other

public interest concerns that may arise.

B. For the purposes of providing legal aid to be rendered through attorneys at law and through paralegals and non-professional support staff, to or for any individual who may be in need of legal services who may appear indigent and/or worthy thereof of services aligning with the list contained in Section A. Thereby, advancing the cause of justice for all under the law.
C. To advance the knowledge of the law and justice to the general public in an effort to create a more knowledgeable and just society.
D. The making of distributions to organizations under the section 501(c)(3) of the Internal Revenue Code, or corresponding section of any future federal tax code."

16. Upon information and belief, on **December 18, 2015**, Courtney Jordan formed Courtney Jordan, Inc., in Delaware. The Registered agent was listed as Incoor Services, Inc., in Delaware.

17. Upon information and belief, in **September 2016,** Courtney Jordan established the Jordan Family Trust.

18. On **October 13, 2017**, the North Carolina Secretary of State suspended CJ Group for failure to comply with the requirements of N.C. Gen. Stat. § 105-230(a). To remove the suspension, the corporation was required to contact the North Carolina Department of Revenue to correct its deficiency. As of the date of filing this complaint, CJ Group remains suspended per the North Carolina Secretary of State's website.

19. Upon information and belief, on **October 18, 2017**, Jordan was summarily ejected from 5 Sydenham Road, Durham, NC 27713.

20. Upon information and belief, on **January 3, 2023**, CJ Group's business address was 235 E. Raleigh Street, Siler City, NC 27344.

21. **On January 3, 2023**, CJ Group's landlord filed summary ejectment and money owed actions in Chatham County District Court against "Courtney Jordan Group Inc *alias* CJGRPINC" at 235 E. Raleigh Street, Siler City, NC 27344.

22. On **January 9, 2023**, CJGRPINC Foundation, Inc., filed Articles of Dissolution Prior to Commencement of Activities for Nonprofit Corporation. The Articles of Dissolution were signed by Mandee Woodard, whose address was 10030 Green Level Church Road, Suite 802-2055, Cary, NC 27519 (hereinafter "the Green Level Church Road" address).

23. Upon information and belief, CJ Group has two branches of companies: the non-profit subsidiaries and the for-profit subsidiaries. Upon information and belief, at all times relevant to this action, CJ Group comprised, at a minimum, the following companies:

a. Non-profit subsidiaries:

1. CJF America, Inc.
2. CJF Bangladesh
3. CJF Sri Lanka
4. CJF Mozambique

b. For-profit subsidiaries:

1. Venture Beyond Capital/Neyius, Inc.
2. Venbeycap American Holdings
3. Underground Ventures, Inc. d/b/a The Underground Corporation

24. Plaintiff anticipates that additional subsidiaries and shell companies will be discovered through the discovery process.

25. Upon information and belief, at all times relevant to this action, the CJ Group and the multiple companies listed above and others that are yet to be discovered that exist within the Enterprise are alter egos of Courtney Jordan, Nicholas Gallardo, Kristen Picot, and Rhoda Hormenoo.

NON-PROFIT SUBSIDIARIES OF CJF GROUP (EXHIBIT B)

CJF AMERICA, INC.

26. CJF America, Inc., ("CJF America") is a nonprofit corporation organized under the laws of North Carolina on **January 10, 2023**.

27. Upon information and belief, CJF America was created one (1) day after CJGRPINC Foundation, Inc., was dissolved.

28. According to CJF America's website, it is "a dedicated branch of The Courtney Jordan Foundation" that is "committed to the relentless pursuit of empowerment and change. We are not alone in this mission; our global family includes CJF Bangladesh, CJF Sri Lanka, and CJF Mozambique, working in harmony to create brighter, more prosperous tomorrows for communities worldwide." The website also notes: "The Courtney Jordan Foundation, our parent organization, has been an enduring force for good, leaving an indelible mark on countless lives. It is this legacy of transformative change that fuels our passion and drives our purpose, set fourth (sic) by our Founder and Benefactor Entrepreneur Courtney Jordan." Finally, the CJF America website reiterates that "As a part of The Courtney Jordan Foundation, CJF America isn't alone in its quest for change. We are part of a global network that includes CJF Bangladesh, CJF Sri Lanka, and CJF Mozambique, all working in concert to extend the reach of hope and transformation."

29. Upon information and belief, and at all times relevant to this action, CJF America's Registered Agent is **Kristen Picot**.

30. Upon information and belief, and at all times relevant to this action, CJF America's Chief Financial Officer is **Nicholas Gallardo**.

31. CJF America's registered office address is 3511 Shannon Road, 3rd Floor, Durham, NC 27707 (hereinafter "the Shannon Road" location).

32. Upon information and belief, CJF America's registered office address is a Regus coworking office space.

33. CJF America's principal office is at 2634 Durham-Chapel Hill Blvd., Suite 204, Durham, North Carolina (hereinafter "the Durham/Chapel Hill location").

34. Upon information and belief, CJF America has been evicted from the Durham/Chapel Hill location for nonpayment of rent totaling $9,350.01 as of August 31, 2025.

35. Upon information and belief, and at all times relevant to this action, CJF America is a shell company for the Courtney Jordan Group, Inc., and/or DBA "The Courtney Jordan Foundation."

36. Upon information and belief, at all times relevant to this action, CJF America, Inc. has the following subsidiaries and/or shell companies under its umbrella:

a. Blue Brooke Inc.

b. StartUP Siler, LLC./StartUP Fund

c. Azteca Elite Inc.

d. Supercharged Inc.

e. Chatham County Hispanic Coalition, Inc.

f. Cornerstone America

g. Cornerstone Scholars Academy LLC

h. Tags Off LLC

i. Mayfield Ragland Center, Inc.

j. Elysian Therapeutics LLC

k. Elysian Wellness

(*sic*)

BLUE BROOKE INC.

37. Upon information and belief, Blue Brooke Inc. (hereinafter "Blue Brooke") is an active, domestic, non-profit corporation formed under North Carolina law on **January 12, 2023**, three (3) days after CJGRPINC Foundation, Inc., was dissolved. The Incorporator and registered agent are listed as **Kristen Picot**. The Articles indicate that the corporation is a charitable or religious corporation as defined in N.C. Gen. Stat. §55A-1-40(4). The street address and registered agent's office address is listed as "116 E Raleigh St. Num 192, Siler City, NC 27344" (hereinafter "the 116 Raleigh" location). The incorporator attached to the filing a document that included paragraphs related to "The Dissolution Clause" and "The Limitation of Activities Clause."

STARTUP SILER, LLC. / STARTUP FUND (*sic*)

38. StartUP Siler, LLC., (hereinafter "StartUP Siler") is an administratively dissolved limited liability company formed on **January 13, 2023**, four (4) days after CJGRPINC Foundation, Inc., was dissolved. CJF America is listed as the Member/Organizer of the company. The Articles of Organization also notes that CJF America's address was 3600 N. Duke Street, Suite 1, Durham, NC 27704 (hereinafter the "Duke Street" address).

39. Upon information and belief, the Duke Street address is a shopping center.

40. The registered agent was noted as Mackenzie Robinson. Mackenzie Robinson and **Kristen Picot** were named as Corporate Officers.

41. Upon information and belief, the company's street address was listed as "235 E Raleigh Street, Siler City, NC 27344" (hereinafter the "235 Raleigh Street" address), which was the address that was the subject of the summary ejectment action the CJ Group landlord filed on **January 3, 2023**.

42. According to StartUP Siler's website, "StartUP Siler is A Major Initiaive Of CJF

America, Inc. Which Is The US Giving Arm Of The Courtney Jordan Foundation." (*sic*). **Kristen Picot** is listed as the Executive Director of the company as one of the "core" team members. Dillon Brooks (Neyius) is listed as an Advisor.

43. According to a November 5, 2023, announcement post, "StartUP Siler is Now The StartUP Fund." (sic). It further states that, "StartUP Siler is a $20 million investment fund aimed at revitalizing economically disadvantaged rural communities."

44. On September 3, 2024, the North Carolina Secretary of State notified StartUP Siler that their annual report was due. **On November 20, 2024**, StartUP Siler was administratively dissolved due to the company's failure to file an annual report.

45. Upon information and belief, StartUP Fund is not a registered company with the North Carolina Secretary of State.

AZTECA ELITE INC. (*sic*)

46. Upon information and belief, Azteca Elite Inc. (hereinafter "Azteca") is an active, domestic, non-profit corporation formed under North Carolina law on **January 17, 2023**, eight (8) days after CJGRPINC Foundation, Inc., was dissolved. The Articles of Incorporation indicate that the corporation is a charitable or religious corporation as defined in NCGS §55A-1-40(4). The incorporator, registered agent, and President of Azteca were listed as **Nicholas A Gallardo**. Azteca's street address was listed as 1024 Mebane Oaks Road, Suite 1004, Mebane, NC 27302 (hereinafter the "Mebane Oaks" address). Attached to the filing was the exact same document that was attached in Blue Brooke's, incorporation, which included paragraphs related to "The Dissolution Clause" and "The Limitation of Activities Clause."

47. Upon information and belief, Azteca has no website or any physical presence.

SUPERCHARGED INC. (*sic*)

48. Upon information and belief, Supercharged Inc. (hereinafter "Supercharged") is an active, domestic, non-profit corporation formed under North Carolina law also on **January 17, 2023**, eight (8) days after CJGRPINC Foundation, Inc., was dissolved. The Articles of Incorporation indicate that the corporation is a charitable or religious corporation as defined in N.C. Gen. Stat. § 55A-1-40(4). The incorporator, registered agent, and President of Supercharged were listed as **Nicholas A. Gallardo**. Supercharged's street address was listed as the 116 Raleigh location, the same address as Blue Brooke. Attached to the filing was the exact same document attached in Blue Brooke, Inc.'s, incorporation, which included paragraphs related to "The Dissolution Clause" and "The Limitation of Activities Clause."

CHATHAM COUNTY HISPANIC COALITION INC. (*sic*)

49. Upon information and belief, Chatham County Hispanic Coalition Inc. (hereinafter "CCHC") is an active, domestic, non-profit corporation formed under North Carolina law also on **January 17, 2023**, eight (8) days after CJGRPINC Foundation, Inc., was dissolved. The Articles of Incorporation indicate that the corporation is a charitable or religious corporation as defined in N.C. Gen. Stat. § 55A-1-40(4). The incorporator, registered agent, and President of CCHC was listed as **Nicholas Gallardo**. CCHC's street address was listed as the 116 Raleigh location, the same address as Blue Brooke and Supercharged. Attached to the filing was the exact same document that was attached in Blue Brooke's and Supercharged's Articles of Incorporation, which included paragraphs related to "The Dissolution Clause" and "The Limitation of Activities Clause."

50. On September 4, 2026, **Nicholas Gallardo** filed a Statement of Change of Registered Office and/or Registered Agent with the North Carolina Secretary of State changing

the registered agent to Dru Scot Allen.

51. Also on **January 17, 2023**, CJ Group's landlord voluntarily dismissed its summary ejectment and money owed actions against "Courtney Jordan Group Inc *alias* CJGRPINC" for the 235 Raleigh Street address that StartUP Siler used as the company's street address.

CORNERSTONE AMERICA

52. Upon information and belief, at all times relevant to this action, Cornerstone America, whose website advertises it is a "Division of CJF America, Inc.," is not a registered corporation with the North Carolina Secretary of State.

53. Cornerstone America's website indicates that it was designed by "Monster Fruit Creative, a part of Neyius Media, LLC."

CORNERSTONE SCHOLARS ACADEMY LLC (*sic*)

54. Upon information and belief, Cornerstone Scholars Academy LLC (hereinafter "CSA") is an active, though not current, domestic limited liability company formed on **May 15, 2024**. CSA's President and registered agent is **Kristen Picot**. CSA's Senior VP of Finance is **Nicholas Gallardo**. The Chairman of the Board is listed as **Courtney Jordan**.

55. CSA's Articles of Organization list the Organizers as CJF America, Inc., and Neyius Media, LLC. Both organizer-company's business addresses are listed as 1801 Fayetteville Street 19855c, Durham NC 27707.

56. Upon information and belief, 1801 Fayetteville Street, Durham, NC 27707 is the address for North Carolina Central University (hereinafter "the NC Central" address). Upon information and belief, there is no physical location for "19855c".

57. CSA's street address listed on the Articles of Organization is 437 Mount Bethel Church Street, Roxboro, NC 27573 (hereinafter the "Mount Bethel" address).

58. On August 6, 2025, Kristen Picot filed an Annual Report with the Secretary of State's office updating CSA's street and mailing addresses to "118 S Main St, Ste A, Roxboro, NC 27573-4766" (hereinafter "the Roxboro" address).

59. Upon information and belief, CJF America signed a lease with Downey Investments, LLC, to pay $2,500 per month for the Roxboro address. CJF America paid March and April rent but failed to pay May through August 2025 rent. CJF America was summarily ejected from this location in October 2025.

TAGS OFF LLC

60. Upon information and belief, Tags Off LLC (hereinafter "Tags Off") is an administratively dissolved, domestic limited liability company formed under North Carolina law on **August 22, 2024**. The principal office address and registered office address were listed at 2800 Durham Road, Roxboro, NC 27573. The organizers listed in the Articles of Organization are CJF America, Inc., of the Shannon Road location, and Neyius Media, LLC, of the NC Central address. Tags Off's Company officials were listed as **Kristen Picot** as an authorized signatory and **Nicholas Gallardo** as Chief Financial Officer. The addresses for both Picot and Gallardo were the NC Central address.

61. Tags Off was administratively dissolved on November 14, 2025, for failing to file its annual reports.

MAYFIELD RAGLAND CENTER, INC.

62. Upon information and belief, Mayfield Ragland Center, Inc., (hereinafter "Mayfield Ragland") is an active, domestic, non-profit corporation incorporated in North Carolina on **October 8, 2024**. The initial registered agent is listed as **CJF America** at the NC Central address. CJF America is also listed as the incorporator at the NC Central address. The address of

the principal office of the corporation is listed as the Mount Bethel address associated with CSA. **Kristen Picot** is listed as Secretary and **Rhoda Hormenoo** is listed as the Executive Director. Kristen Picot signed on behalf of CJF America as its President. Attached to the filing was the exact same document that was attached in Blue Brooke's, Supercharged's, and CCHC's Articles of Incorporation, which included paragraphs related to "The Dissolution Clause" and "The Limitation of Activities Clause."

63. CJF America's website touts that Mayfield Ragland was a "recent initiative in Roxboro, North Carolina" that provides a "dedicated space featuring a computer lab, a reading room, gaming areas, and mentorship support, the center is a safe, welcoming environment where young people can learn, explore, and grow. It is also a place where job training, STEM education, and community health resources come together to support residents holistically."

64. **Kristen Picot** filed a Statement of Change of Principal Office as Mayfield Ragland's secretary on **August 11, 2025**. The principal office location was changed from the Mount Bethel location to the Roxboro address associated with CSA, from which CSA would be summarily ejected in October 2025.

ELYSIAN THERAPEUTICS LLC (*sic*)

65. Upon information and belief, Elysian Therapeutics LLC (hereinafter "Elysian") is an active, though not current, domestic company formed on **March 31, 2025**. The organizer indicated on the Articles of Organization is CJF America at the NC Central address. **Courtney Jordan** signed as Organizer and Executive Chairman of the Board on behalf of CJF America. Elysian's managers are listed as **Nicholas Gallardo**, **Courtney Jordan**, **Kristen Picot**, and Samuel Williams. **Nicholas Gallardo** is also Elysian's registered agent.

66. The Articles of Organization indicate that Elysian does not have a principal office.

67. All managers' addresses, the registered office address, and registered mailing address of Elysian are listed at the NC Central address.

68. Upon information and belief, United States healthcare providers are assigned a 10-digit identification number to be used by CMS for use in HIPAA-standard electronic transactions. This identification number is called a National Provider Identifier or "NPI". Upon information and belief, Elysian's NPI is 1396531125. The online NPI database registry indicates that **Rhoda Hormenoo** is the Senior Vice President of Operations of Elysian.

69. Upon information and belief, at all times relevant to this action, Elysian is a medical provider of counseling services.

ELYSIAN WELLNESS

70. Upon information and belief, at all times relevant to this action, Elysian Wellness, whose website (https://elysianhc.org/) uses "Elysian," "Elysian Wellness," and "Elysian Therapeutics" interchangeably, is not a registered corporation with the North Carolina Secretary of State.

71. Elysian Wellness's website indicates that it was designed by "Monster Fruit Creative."

COMPANIES AND NON-PROFITS FORMED BEFORE CJF AMERICA WAS FORMED (EXHIBIT C)

72. Upon information and belief, the following companies, though formed before CJF America was formed, were formed after CJ Group, and Plaintiff alleges they may be part of the Enterprise to shield Defendants' assets. Plaintiff asserts this list is not exhaustive and may include companies and non-profits that have not yet been discovered:

a. Brookie Makes, LLC

b. Marley's Friends, Inc.

c. Kristen Picot, LLC

d. Prosperity North Carolina, Inc.

BROOKIE MAKES, LLC

73. Upon information and belief, Brookie Makes, LLC, (hereinafter "Brookie") is an administratively dissolved, domestic, limited liability company formed under North Carolina law on **May 14, 2021**.

74. The Registered Agent for Brookie is listed as Stephen Dennis.

75. The registered agent office address is listed as the Green Level Church Road location, which was subsequently used as the location of Mandee Woodard, the individual who dissolved the CJGRPINC Foundation, Inc.

76. The principal office location is listed as the Duke Street address, which was later used as the principal place of business address for CJF America in its Articles of Organization.

77. Brookie's Articles of Organization list as organizers Jared Picot of the Duke Street location; VenBeyCap American Holdings, Inc., of 248 Chapman Road, Newark DE 19702 (hereinafter the "Chapman Road" address); and Lauryn-Grace B. Picot-Jordan of the Duke Street location.

78. The company officials are listed as Jared Christian Picot as Vice President and Lauryn-Grace B. Picot-Jordan as member. Upon information and belief, both officials are related to Picot and/or Jordan.

79. VP Jared Picot's address is listed as the Duke Street address and Owner Picot-Jordan's address is listed as the Chapman Road address. Upon information and belief, this location is an office building in Delaware.

80. Upon information and belief, Picot-Jordan was a minor at the time Brookie Makes,

LLC, was formed.

MARLEY'S FRIENDS, INC.

81. Upon information and belief, Marley's Friends, Inc., (hereinafter "Marley's Friends") is a current, domestic non-profit corporation incorporated under North Carolina law on **January 18, 2022**. The registered agent is **Kristen Picot**. The registered agent address is listed as the 116 Raleigh Street address, which is the address that is also associated with Blue Brooke, Supercharged, and CCHC. The principal office location is also listed as this address. The Incorporator is listed as **Kristen Picot**, and her address is listed as the 235 Raleigh Street address that is associated with StartUP Siler. The Executive Director of Marley's Friends is listed as **Kristen Picot**. Attached to the filing was the exact same document that was attached in Blue Brooke's, Supercharged's, CCHC's, and Mayfield Ragland's Articles of Incorporation, which included paragraphs related to "The Dissolution Clause" and "The Limitation of Activities Clause." The Articles of Incorporation indicate that the corporation is a charitable or religious corporation as defined in N.C. Gen. Stat. § 55A-1-40(4).

KRISTEN PICOT, LLC

82. Kristen Picot, LLC, (hereinafter the "Picot LLC") is an administratively dissolved, domestic, limited liability company formed under North Carolina law on **March 3, 2022**. The Articles of Incorporation indicate that the corporation has an educational purpose.

83. The Registered agent is listed as **Kristen Picot**.

84. The Articles of Organization identifies as Organizers Marley's Friends, Inc., of the 116 Raleigh Street location and The Underground Corporation of 600 N. Broad Street Suite 3604, Middletown, DE 19709.

85. **Kristen Picot** is named as the sole managing member of Picot LLC and her

business address is listed as the 116 Raleigh Street address, which is also associated with Blue Brooke, Supercharged, CCHC, and Marley's Friends.

86. Stephen Dennis, who was also the Registered Agent for Brookie, signed the Articles of Organization as an Organizer on behalf of The Underground Corporation as the Acting CEO.

87. Upon information and belief, "The Underground Corporation" in fact refers to Underground Ventures, Inc., a Delaware corporation formed on **February 1, 2022**.

PROSPERITY NORTH CAROLINA, INC.

88. Prosperity North Carolina, Inc., (hereinafter "Prosperity") is an active, domestic, non-profit corporation incorporated under North Carolina law on **May 5, 2022**. The registered agent is Stephen Dennis, who was also the registered agent for Brookie and Picot LLC.

89. The registered agent address, incorporator address, and principal office address are all listed as the Mebane Oaks address, which is also associated with Azteca.

FOR-PROFIT SUBSIDIARIES OF CJF GROUP (EXHIBIT D)

90. Upon information and belief, the following companies comprise the for-profit branch of CJ Group:

a. Venture Beyond Capital/Neyius, Inc.

b. Venbeycap American Holdings

c. Underground Ventures, Inc. d/b/a The Underground Corporation

91. Upon information and belief, Neyius, Inc., is the top tier of the for-profit arm of the CJ Group. *See* https://neyius.com/about-us/.

92. According to the Neyius website, "Neyius, headquartered in London, UK, is a global family office and diversified enterprise with operations spanning 17 countries and

subsidiaries across technology, manufacturing, hospitality, and philanthropy. Neyius manages equity stakes, strategic growth and portfolio companies."

93. Upon information and belief, Venture Beyond Capital/Neyius, Inc., is further fragmented as follows (and hereinafter collectively, "the Neyius subsidiaries"):

d. Neyius Group

e. Neyius Media

f. Neyius Textiles

g. Neyius Hotel Group

h. The Neyius Corporation

i. Nervyra

94. Upon information and belief, Neyius Media, LLC, (hereinafter "Neyius Media") is deeply rooted and involved in the non-profit subsidiaries.

95. Upon information and belief, Neyius Media is a domestic company formed under North Carolina law on **March 15, 2022**. As of the date of this filing, Neyius Media is administratively dissolved.

96. Neyius Media's Chief Executive Officer is listed as Dillion (sic) Brooks, 600 N. Broad Street, Suite 5 #3604, Middletown, Delaware 19709. Upon information and belief, 600 N. Broad Street, Suite 5 #3604, Middletown, Delaware 19709 is associated with the "Underground Corporation," which was also used to incorporate Kristen Picot, LLC, referenced above.

97. Neyius Media's Chairman of the Board/CFO is listed as **Courtney Jordan** at the NC Central address.

98. Upon information and belief, the Neyius subsidiaries are further fragmented into additional companies, one of which is Monster Fruit Creative, which is noted on multiple

Enterprise websites as the creator of the website.

INDIVIDUALS

COURTNEY JORDAN

99. Upon information and belief, and at all times relevant to this action, Courtney Jordan was a resident of Durham, North Carolina.

100. Upon information and belief, Courtney Jordan holds the following positions associated with the Enterprise:

a. Founder – CJ Group

b. Chairman of the Board – CSA

c. Manager – Elysian

NICHOLAS GALLARDO

101. Upon information and belief, and at all times relevant to this action, Nicholas Gallardo was a resident of Siler City, North Carolina.

102. Upon information and belief, Nicholas Gallardo holds the following positions associated with the Enterprise:

a. Chief Financial Officer – CJF America

b. Managing Partner – StartUP Fund

c. Chief Financial Officer – Tags Off

d. Senior VP of Finance – CSA

e. President –

i. Azteca

ii. Tags Off

iii. Supercharged

iv. CCHC

f. Manager – Elysian

g. Registered Agent –

i. Elysian

ii. Azteca

iii. Tags Off

iv. Supercharged

v. CCHC

KRISTEN PICOT

103. Upon information and belief, at all times relevant to this action, Kristen Picot (hereinafter "Picot") was a resident of Garner, North Carolina.

104. Upon information and belief, Kristen Picot holds the following positions associated with the Enterprise:

a. President – CJF America

b. President – CSA

c. Executive Director – StartUP Siler

d. Secretary – Mayfield Ragland

e. Executive Director – Marley's Friends

f. Manager – Elysian

g. Managing Member – Picot LLC

h. Registered Agent –

i. CJF America

ii. CSA

iii. Blue Brooke

iv. Marley's Friends

i. Authorized Signatory – Tags Off

RHODA HORMENOO

105. Upon information and belief, at all times relevant to this action, Rhoda Hormenoo (hereinafter "Hormenoo") was a resident of Timberlake, NC.

106. Upon information and belief, Rhoda Hormenoo holds the following positions with the Enterprise:

a. Assistant Vice President of Special Programs – CJF America

b. Executive Director – Mayfield Ragland

c. Senior Vice President of Operations – Elysian

FACTS

107. At all times relevant to this action,

a. The individuals listed in paragraph 2 were "employees" (hereinafter collectively the "Employees") of Defendants as defined by N.C. Gen. Stat. § 95-25.2(4);

b. CJF America was an "employer" of the Employees as defined by N.C. Gen. Stat. § 95-25.2(5);

c. Jordan was an "employer" of the Employees as defined by N.C. Gen. Stat. § 95-25.2(5) as he is the founder of CJF America;

d. Gallardo was an "employer" of the Employees as defined by N.C. Gen. Stat. § 95-25.2(5) as he acted directly in the interest of CJF America in relation to the Employees;

e. Picot was an "employer" of the Employees as defined by N.C. Gen. Stat. § 95-25.2(5) as she acted directly in the interest of CJF America in relation to the Employees.

f. Hormenoo was an "employer" of the Employees as defined by N.C. Gen. Stat. § 95-25.2(5) as she acted directly in the interest of CJF America in relation to the Employees.

108. Jordan, Gallardo, Picot, and Hormenoo managed CJF America, directed CJF's financial affairs, supervised CJF's employees, had the authority to hire and fire CJF's employees, had the authority to determine the amounts of wages paid to the Employees for the work they performed for CJF, and had the authority to determine whether wages were paid to the Employees for the work they performed for CJF.

109. Beginning in June of 2025, Plaintiff began receiving complaints that thirteen (13) of Defendants' employees had not been paid all wages accrued to those employees.

110. Plaintiff conducted multiple investigations and determined the following:

a. Ms. Angela Arrindell Brigman was hired as an "Executive Assistant" for Defendants. Ms. Brigman did not receive wages for the time she worked for Defendants from June 2, 2025, through June 13, 2025. Defendants confirmed that Ms. Brigman is entitled to $3,461.53 in wages that she has not received.

b. Ms. Asia Brown was hired as a camp counselor for Defendants. Ms. Brown did not receive wages for the time she worked for Defendants from June 23, 2025, through July 21, 2025. Defendants confirmed that Ms. Brown is entitled to $1,541.02 in wages she has not received.

c. Mr. Blair Huger was hired as a "Youth Program Coordinator" for Defendants. Mr. Huger did not receive wages for the time he worked for Defendants from June 9, 2025, through October 15, 2025. Defendants confirmed that Mr. Huger is entitled to $6,346.15 in wages that he has not received.

d. Ms. D'Nesha Jones was hired as a "Youth Program Coordinator" for Defendants. Ms. Jones did not receive wages for the time she worked for Defendants from June 9, 2025, through July 9, 2025. Defendants confirmed that Ms. Jones is entitled to $4,583.00 in wages that she has not received.

e. Ms. Sydney Jones was hired as an "Executive Director" for Defendants. Ms. Jones did not receive wages for the time she worked for Defendants from June 2, 2025, through July 30, 2025. Defendants confirmed that Ms. Jones is entitled to $19,061.52 in wages that she has not received.

f. Ms. Erica Medlin was hired as the "Executive Director" for Defendants. Ms. Medlin did not receive wages for the time she worked for Defendants from June 9, 2025, through July 31, 2025. Defendants confirmed that Ms. Medlin is entitled to $10,000.00 in wages that she has not received.

g. Ms. Cherisse Collins was hired as an "Assistant Vice President" for Defendants. Ms. Collins did not receive wages for the time she worked for Defendants from May 14, 2025, through July 9, 2025. Defendants confirmed that Ms. Collins is entitled to $26,960.00 in unpaid wages.

h. Ms. Courtney Ingram was hired as an "Program Coordinator" for Defendants. Ms. Ingram did not receive wages for the time she worked for

Defendants from June 9, 2025, through June 23, 2025. Defendants confirmed that Ms. Ingram is entitled to $853.56 in wages that she has not received.

i. Ms. Takiyah Knight was hired as an "Executive Director" for Defendants. Ms. Knight did not receive wages for the time she worked for Defendants from June 2, 2025, through June 15, 2025. Defendants confirmed that Ms. Knight is owed $2,120.46 in unpaid wages.

j. Ms. June McKithen was hired as an "Executive Director" for Defendants. Ms. McKithen did not receive wages for the time she worked for Defendants from June 9, 2025, through July 18, 2025. Defendants confirmed that Ms. McKithen is entitled to $8,076.92 in wages that she has not received.

k. Ms. Andjelani Mubenga was hired as a "Program Manager" for Defendants. Ms. Mubenga did not receive wages for the time she worked for Defendants from June 9, 2025, through July 7, 2025. Defendants confirmed that Ms. Mubenga is entitled to $2,230.76 in wages that she has not received.

l. Ms. Kendra Pressley was hired as a "Program Manager" for Defendants. Ms. Pressley did not receive wages for the time she worked for Defendants from June 9, 2025, through July 7, 2025. Defendants confirmed that Ms. Pressley is entitled to $4,132.33 in wages that she has not received.

m. Ms. Brianna Rivers was hired as a camp counselor for Defendants. Ms. Rivers did not receive wages for the time she worked for Defendants from June 23, 2025, through July 21, 2025. Defendants confirmed that Ms. Rivers is entitled to $1,804.27 in wages that she has not received.

n. Additional details and findings regarding these employees and their wages owed are included in Exhibit E as if incorporated herein.

111. On numerous dates between July and August 2026, Plaintiff sent Defendants, via certified mail and email notification, letters stating a determination had been made that Defendants owed the Employees unpaid wages and offered Defendants the opportunity to be heard and providing notice of administrative appeal pursuant to N.C.G.S. § 95-25.22(g) and 13 NCAC 12 .0604.

112. Defendants acknowledged that the Employees in paragraph 2 are entitled to unpaid wages. *See* Exhibit E.

FIRST CAUSE OF ACTION
(VIOLATION OF THE NORTH CAROLINA WAGE & HOUR ACT)

113. Plaintiff reasserts the allegations of Paragraphs 1 through 112 above and incorporates them fully by reference as if contained herein.

114. Defendants failed to pay the Employees all wages due to them as those wages became due, in violation of N.C. Gen. Stat. § 95-25.6.

115. Defendants failed to pay the Employees all wages due to them on or before the next regular pay day after the discontinuation of their employment with Defendants, in violation of N.C. Gen. Stat. § 95-25.7.

116. Defendants owe the Employees an amount in unpaid wages of $91,171.52.

117. Defendants violated the Act by not paying the wages owed to the Employees.

118. The Employees are entitled to receive interest while Defendants refused to pay the Employees their back wages, and that the interest shall accrue weekly until all wages are paid in full.

119. As of the date of the filing of this complaint, interest had accrued in the amount of

$9,292.47.

120. As of the date of this filing, Defendants have not paid wages due/back wages to any of the Employees.

121. Plaintiff has exhausted all available administrative remedies to recover these unpaid wages from Defendants.

122. Pursuant to N.C. Gen. Stat. § 95-25.24, Plaintiff is entitled to injunctive relief enjoining Defendants from violating the Act and withholding wages due under the Act to the Employees.

123. Pursuant to N.C. Gen. Stat. § 95-25.22(a) and (c), Plaintiff is entitled to an award of $91,171.52, the amount of unpaid wages due from Defendants to Employees, plus the total accrued interest as the date each amount first came due, and ongoing interest as it accrues until Defendants pay the Employees' wages in full.

124. In addition, pursuant to N.C. Gen. Stat. § 95-25.22(a1), Plaintiff is entitled to liquidated damages in an amount equal to the amount due from Defendants in the preceding paragraph.

125. Pursuant to N.C. Gen. Stat. § 95-25.22(d), this Court may also award reasonable attorney's fees to Plaintiff. In the event of a default judgment, Plaintiff is entitled to, and this Court should order, attorney's fees in the amount of $300.00 to be paid by Defendants.

126. Pursuant to N.C. Gen. Stat. §95-25.22(d), this Court may award Plaintiff costs and fees for this action to be paid by the Defendants.

127. The corporate and individual defendants are jointly liable for the unpaid wages as "Employers" under the Act.

SECOND CAUSE OF ACTION
(PIERCING THE CORPORATE VEIL AGAINST ALL INDIVIDUAL DEFENDANTS)

128. Plaintiff reasserts the allegations of Paragraphs 1 through 127 above and incorporates them fully by reference as if contained herein.

129. Upon information and belief, the individual defendants completely controlled the operation and management of CJF America. Upon information and belief, the individual defendants made all the decisions regarding the operation of CJF America, and more specifically, the summer camp run by CJF America.

130. Upon information and belief, the individual defendants operate CJF America as if they were mere extensions of the individual defendants.

131. Upon information and belief and incorporating all facts set forth in this complaint, CJF America has not obeyed the corporate forms.

132. Upon information and belief and incorporating all facts set forth in this complaint, CJF America was insufficiently capitalized to carry out its allegedly intended businesses.

133. Upon information and belief, CJF America was formed for the improper purpose as a shield against liabilities for employee wages.

134. The employees were harmed by CJF America's failure to pay their wages.

135. The individual defendants have treated the assets of CJFGRPINC Foundation, Inc., CJF Group, CJF America, and any subsidiaries as their own individual assets.

136. The individual defendants have operated not only CJFGRPINC Foundation, Inc., CJF Group, and CJF America but also all the companies listed in this complaint as mere extensions of the Individual Defendants.

137. The individual defendants are individually liable for the debts and obligations of CJF America and all its subsidiaries.

THIRD CAUSE OF ACTION
(DISREGARD OF CORPORATE ENTITY OF AFFILIATED COMPANY AGAINST COURTNEY JORDAN, INC., CJ GROUP, VENTURE BEYOND CAPITAL/NEYIUS, INC., VENBEYCAP AMERICAN HOLDINGS, AND UNDERGROUND VENTURES, INC. D/B/A THE UNDERGROUND CORPORATION)

138. Plaintiff reasserts the allegations of Paragraphs 1 through 137 above and incorporates them fully by reference as if contained herein.

139. Upon information and belief, the four individual Defendants in this action are intertwined in a web of companies that all relate to Courtney Jordan and the "foundation." Each of the companies in this complaint, except Brookie Makes (which presumably includes family members of Picot) and Prosperity (which includes an Enterprise associate and an Enterprise address), involve at least two of the four individual defendants and use addresses associated with the Enterprise.

140. Upon information and belief, according to multiple websites for Enterprise, the CJF companies (America, Bangladesh, Sri Lanka, and Mozambique) comprise the non-profit wing of the Enterprise while Venture Beyond Capital/Neyius, Inc.; Venbeycap American Holdings; Underground Ventures, Inc. d/b/a The Underground Corporation comprise the for-profit wing of the Enterprise.

141. Upon information and belief, Defendants have excessively fragmented the Enterprise to shield itself and its assets from civil actions. This is further evidenced by the fact that none of the addresses associated with the Enterprise are owned by the subsidiary companies or individual defendants. All business and registered agent addresses are associated with rental properties. Defendants have been evicted from at least three of the addresses listed as principal places of business and/or registered agent addresses. The address Mr. Jordan listed as his home address in the pending criminal actions against him is for a home he rents in Durham County. Even the car Mr. Jordan and Mr. Gallardo were using when they were arrested was borrowed from an

acquaintance.

142. Upon information and belief, and at all times relevant to this action, the individual defendants controlled the affiliated companies' obligations such that CJF America, Courtney Jordan Foundation, CJFGRPINC Foundation, Inc., CJ Group, and any and all subsidiaries had no separate will or existence of its own.

WHEREFORE, Plaintiff prays that the Court:

1. Adjudge that Defendants violated the Act, and that Defendants are jointly and severally liable for all unpaid wages and other relief, as prayed for herein;

2. Pursuant to N.C. Gen. Stat. § 95-25.24, prevent Defendants from further violating the Act and enjoin Defendants from withholding all wages due to the Employees;

3. Pursuant to N.C. Gen. Stat. § 95-25.22, order that Plaintiff have and recover of Defendants the total amount of wages and interest due to the Employees;

4. As required by N.C. Gen. Stat. § 95-25.22(a1), order that Plaintiff have and recover of Defendants liquidated damages is an amount equal to the wages due to the Employees;

5. Pursuant to N.C. Gen. Stat. § 95-25.22(a), order that Plaintiff have and recover of Defendants interest, at a rate of 8% per annum, on those unpaid wages from the date all wages became due until those wages are paid in full;

6. Order that Plaintiff have and recover of Defendants Plaintiff's reasonable attorney's fees or, in the event of default judgment, Plaintiff's attorney's fees in the amount of $300.00 as required by N.C. Gen. Stat. § 95-25.22(d);

7. Order that Plaintiff have and recover of Defendants Plaintiff's costs pursuant to N.C. Gen. Stat. § 95-25.22; and

8. Award such other relief as the Court deems proper.

This the 18th day of November 2026.

Respectfully submitted,

LUKE FARLEY
Commissioner of Labor

/s/ Kathleen P. Dunn
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VERIFICATION

Kisha Scotton, being first duly sworn, deposes and says that she is the Administrator of the Wage and Hour Bureau, North Carolina Department of Labor; that she has read the foregoing complaint and the allegations contained herein, which are based on the investigation conducted by her Bureau, and the same are true and correct to the best of her knowledge, information and belief.

Kisha Scotton
Administrator
Wage and Hour Bureau
N.C. Department of Labor

Sworn to and subscribed before me
This the 17th day of NOV, 2026.

Notary Public
My Commission Expires:
03/28/2029

CARLA ROSE NOTARY PUBLIC WAKE COUNTY, N.C.