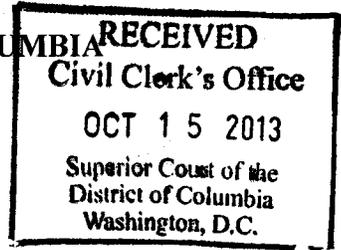


IN THE SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
CIVIL DIVISION



DISTRICT OF COLUMBIA,
a municipal corporation,
441 Fourth Street, N.W.
Washington, D.C. 20001,

Plaintiff,

v.

ULTIMATE EVENTS LLC,
a Nevada corporation,
1455 Pennsylvania Ave. N.W.
Washington, DC 20004,

WILIAM S. LOIRY,
d/b/a UNITED STATES LEADERSHIP FORUM,
d/b/a US LEADERSHIP FORUM, and
d/b/a WORLD LEADERSHIP FORUM,
174 Water Color Way # 262
Santa Rosa Beach, FL 32459,

Defendants.

Civil Action No.: _____

13 - 0006960

COMPLAINT FOR STATUTORY AND EQUITABLE RELIEF

1. Plaintiff, the District of Columbia ("District"), by and through its Attorney General, files this Complaint against Defendant Ultimate Events, LLC ("Ultimate Events") and Defendant William S. Loiry ("Loiry"), d/b/a United States Leadership Forum, US Leadership Forum, and World Leadership Forum, for statutory and equitable relief from Defendants' unlawful and deceptive conduct in promoting and misrepresenting, while not registered to do business in the District of Columbia, conferences to be held in the District of Columbia, including Defendants' failure to honor refund requests from registrants of a postponed

conference. Among other relief, the District seeks an injunction preventing Defendants from doing business in the District of Columbia until Defendants 1) pay restitution owed to registrants, including sponsors, for conferences scheduled to take place in the District of Columbia but postponed or cancelled by Defendants; 2) pay all fees, charges, and penalties arising from their conduct of business in the District of Columbia while unregistered; 3) are duly registered by the District of Columbia Department of Consumer and Regulatory Affairs (“DCRA”) to do business in the District of Columbia; and 4) comply with such further conditions as the Court deems appropriate.

Jurisdiction

2. This Court has jurisdiction over the subject matter of this case pursuant to D.C. Code § 11-921 and §§ 29-105.12 and 29-105.02(f).

3. This Court has personal jurisdiction over all Defendants pursuant to D.C. Code §§ 13-423(a)(1), (a)(3), and (a)(4).

The Parties

4. The District, a municipal corporation empowered to sue and be sued, is the local government for the territory (“D.C.”) constituting the permanent seat of the government of the United States. The District brings this action through its Attorney General pursuant to the Attorney General’s statutory authority, under D.C. Code §§ 29-105.12 and 29-105.02(f), to bring actions to enforce compliance with Title 29 of the D.C. Code.

5. Defendant Ultimate Events is a limited liability company organized, existing, and doing business under and by virtue of the laws of the State of Nevada. Ultimate Events’ corporate status in Nevada is revoked, according to the public records of the Nevada Secretary of State. Ultimate Events was registered by the District to do business as a foreign limited liability company in D.C. from December 8, 2010 until November 14, 2011.

6. Defendant Loiry is domiciled in the State of Florida, and resides at 174 Water Color Way #262, Santa Rosa Beach, FL 32459.

7. United States Leadership Forum, US Leadership Forum, and World Leadership Forum are fictitious business names used by Defendant Loiry while conducting business in D.C. United States Leadership Forum maintains a website at <http://www.leadershipforum.us>, which states it is “an independent organization,” founded in January 2010, that works “to identify solutions to our most critical problems.” World Leadership Forum maintains a website at <http://www.worldleadership.info>, which states it is “an independent public service organization working to identify solutions to our most critical problems.” US Leadership Forum has a Twitter account at @CleanDefense13, which advertises, promotes, and solicits payments for United States Leadership Forum and World Leadership Forum events scheduled to occur in D.C.

8. Loiry is the founder and Chairman of United States Leadership Forum, the Chairman and managing member of Ultimate Events, and the Chairman of the World Leadership Forum.

Defendants Are Not Registered to Do Business in D.C.

9. As a limited liability company organized under the laws of Nevada, Defendant Ultimate Events is a foreign filing entity that must register to do business in D.C. under Title 29 of the D.C. Code. District law requires Ultimate Events to register to do business in D.C. and to maintain its registration by filing a biennial report. D.C. Code §§ 29-102.11, 29-105.02-03, 29-105.11(a)(2), 29-105.11(c). Because it failed to file a biennial report with DCRA that was due in June 2011, DCRA revoked Ultimate Events’ registration as of November 14, 2011, at which point its authority to do business in D.C. ceased.

10. Defendant Loiry's fictitious business names United States Leadership Forum, World Leadership Forum and US Leadership Forum are not registered as trade names in D.C. They are not corporate entities organized under the laws of the District. If they are corporate entities formed in another jurisdiction, they are not registered to do business in D.C. as required by D.C. Code §§ 29.105.02-03.

Defendants Are Doing Business in D.C.

11. Defendant Loiry has been conducting business in D.C. as United States Leadership Forum or US Leadership Forum, while unregistered to do business in D.C., since approximately January 2010, and as World Leadership Forum since at least 2011. Loiry, and his agents, associates, and employees, have used and continue to use the names United States Leadership Forum, World Leadership Forum, or US Leadership Forum to promote, advertise, publicize, and solicit payments for conferences, trade shows, and other events that have or purportedly have occurred or will or purportedly will occur in D.C. ("D.C. events").

12. Defendants have promoted, under the name United States Leadership Forum, an event titled either the American Energy Security Summit or the American Energy Summit (hereafter the "American Energy Summit"). Defendants were seeking payments for attendance at the American Energy Summit until approximately September 13, 2013, and were advertising, until approximately September 25, 2013, that the event would occur in D.C. Defendants have received at least \$27,740.00 in registration and sponsorship fees for the American Energy Summit from at least five companies.

13. United States Leadership Forum's website at <http://www.leadershipforum.us> and US Leadership Forum's Twitter account at @CleanDefense13 collectively identify at least eight conferences, summits, briefings, or events that have purportedly occurred in D.C. since January

2010. The United States Leadership Forum website contains photographs that purport to be of speakers from certain of these D.C events, and contains partial lists of registrants for three of the D.C. events. According to the website and the @CleanDefense13 Twitter account, United States Leadership Forum “organized” or “convened” these events.

14. World Leadership Forum was, until approximately September 13, 2013, promoting and seeking payments for an event titled the World Energy Summit, which was advertised as purportedly scheduled to occur in D.C. on September 27, 2013.

15. World Leadership Forum’s website at <http://www.worldleadership.info> identifies two events that it organized and held in D.C. in 2011. The website contains photographs that purport to be of speakers from these two events.

16. For United States Leadership Forum events, Defendants have charged registration fees ranging from \$195 to \$995, and sponsorship fees ranging from \$2,000 to \$12,750. For World Leadership Forum events, Defendants have charged registration fees ranging from \$395 to \$995.

17. Defendant Ultimate Events has been conducting business in D.C. while unregistered to do so since November 14, 2011.

18. Sponsors of United States Leadership Forum events receive invoices and contracts on the letterhead of United States Leadership Forum. The invoices direct that payment be made to Ultimate Events, United States Leadership Forum’s “events management firm.” Ultimate Events also receives and processes credit card payments made by sponsors or registrants of Defendants’ D.C. events, using a Washington D.C. address as its business address.

19. Ultimate Events is the entity that contracts with venues for meeting space for Defendants' D.C. events, on the occasions when Defendants actually enter into firm contracts for locations for their D.C. events.

Defendants' Business Practices Have Led to Requests for Refunds for Their D.C. Events, Which Defendants Have Refused to Honor

20. In addition to promoting and collecting payments for D.C. events while unregistered to do business in D.C., Defendants have provided registrants for these D.C. events, including sponsors, and the public with misleading and inaccurate information regarding the D.C. events. This information has been material to the decisions of registrants to sign up for the D.C. events, to make payments to Defendants, and not to request refunds from Defendants.

21. Defendants have misrepresented the identity of registrants for the American Energy Summit and the size of the event. The United States Leadership Forum website identified 36 businesses and government agencies that purportedly are registered for the American Energy Summit. At least one of the listed businesses is not registered to attend or sponsor the event, and other listed businesses have requested that Defendants remove their names from the list of registrants. Defendants have not corrected the list of registrants on the website.

22. Defendant Loiry and his agent have misrepresented to registrants that the American Energy Summit would occur at the Walter E. Washington Convention Center. In fact, Defendants have never executed a contract to hold the event at the Convention Center or at any other venue.

23. In July 2013, Defendants rescheduled the American Energy Summit to October 28-30, 2013. Since then, Defendants have not identified a specific location for the American Energy Summit. Since changing the scheduled date, Defendants have informed registrants and

the public that Defendants are planning for participation by hundreds of government, military, and business leaders at the event. However, the specific venue in D.C. that Defendants recently sought to use for the event would have accommodated, at most, 90 people.

24. Defendants have routinely delayed providing, or have failed to provide altogether, information about the American Energy Summit to registrants, including sponsors. Sponsors of the American Energy Summit have repeatedly, and unsuccessfully, requested exhibitor agreements, detailed agendas, and lists of speakers and presentations for the event.

25. Defendants unilaterally change the dates of their D.C. events and “transfer” sponsorship and registration fees to the new dates or to different D.C. events, without honoring refund requests from registrants, including sponsors. This practice has led to complaints and repeated refund requests from registrants.

COUNT I – DOING BUSINESS WHILE UNREGISTERED

26. The District realleges Paragraphs 1 through 25 as if fully set forth herein.

27. Defendants have conducted, and are conducting, business in D.C. in violation of D.C. Code §§ 29.105.02-03.

COUNT II – FAILURE TO FILE BIENNIAL REPORT

28. The District realleges Paragraphs 1 through 25 as if fully set forth herein.

29. Defendant Ultimate Events has failed to file a biennial report with DCRA, in violation of D.C. Code § 29-105.11.

COUNT III – MISREPRESENTATIONS

30. The District realleges Paragraphs 1 through 25 as if fully set forth herein.

31. Defendants' misrepresentations regarding their D.C. events have harmed registrants and justify equitable relief for these registrants, including rescission of transactions, pursuant to D.C. Code § 29-105.12.

PRAYER FOR RELIEF

WHEREFORE, the District of Columbia respectfully requests that this Court:

- a. Enjoin Defendants, and all others acting in concert or participation with any of the Defendants, from doing business in the District of Columbia, until Defendants:
 - i. pay restitution owed to registrants of Defendants' D.C. events;
 - ii. pay all fees, penalties, and charges due and owing relating to conduct of business in D.C. while unregistered to do so;
 - iii. are duly registered by DCRA to do business in the District of Columbia;
and
 - iv. comply with such further conditions as the Court deems appropriate.
- b. Order rescission of transactions affected by Defendants' misrepresentations regarding their D.C. events.
- c. Grant such further equitable relief as the Court deems just and proper.
- d. Award the District, pursuant to D.C. Code 29-105.02(f), all fees, penalties, and charges due and owing by Defendants in connection with their conduct of business in D.C. while unregistered to do so.

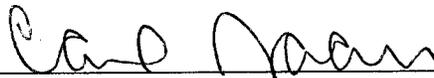
Respectfully submitted,

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Public Interest Division



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Dated: October 15, 2013

Attorneys for the District of Columbia