

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

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**KENNETH D. BELL, in his capacity as court-appointed  
Receiver for Rex Venture Group, LLC d/b/a  
ZeekRewards.com,**

**Plaintiff,**

**vs.**

**TODD DISNER, in his individual capacity and in his  
capacity as trustee for Kestrel Spendthrift Trust;  
TRUDY GILMOND; TRUDY GILMOND, LLC;  
JERRY NAPIER; DARREN MILLER; RHONDA  
GATES; DAVID SORRELLS; INNOVATION  
MARKETING, LLC; AARON ANDREWS; SHARA  
ANDREWS; GLOBAL INTERNET FORMULA, INC.;  
T. LEMONT SILVER; KAREN SILVER; MICHAEL  
VAN LEEUWEN; DURANT BROCKETT; DAVID  
KETTNER; MARY KETTNER; P.A.W.S. CAPITAL  
MANAGEMENT LLC; LORI JEAN WEBER; and a  
Defendant Class of Net Winners in  
ZEEKREWARDS.COM;**

**Defendants.**

Civil Action No. 3:14-cv-91

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**RECEIVER’S MOTION FOR CLASS CERTIFICATION**

Kenneth D. Bell, as the Receiver for Rex Venture Group, LLC (“Receiver” or “Plaintiff”), and through his undersigned counsel, respectfully moves this Court to certify a defendant class in this action pursuant to Federal Rules of Civil Procedure 23(a) and (b)(1)(A) and (B). The requested class is comprised of all persons or entities who were Net Winners (i.e. received more money than they paid) in the ZeekRewards Ponzi and/or pyramid scheme of more than one thousand dollars (\$1,000) (the “Net Winner Class”). As described in detail in the

Receiver's Memorandum of Law in Support of Receiver's Motion for Class Certification, class certification is particularly appropriate in this action because there are approximately 9,400 class members whose liability rests on the central question of whether the Receiver may recover funds fraudulently transferred to the Net Winner Class in connection with the ZeekRewards scheme. The Receiver will notify the Net Winner Class of this motion by email and publication on the public website maintained by the Receiver ([www.zeekrewardsreceivership.com](http://www.zeekrewardsreceivership.com)).

WHEREFORE, the Receiver respectfully requests that this Court certify the Net Winner Class for all appropriate purposes, appoint one or more of the individual defendants in this action as class representatives, approve the Receiver's precertification notification to the proposed class and enter such other and further orders as may be necessary to effect the proper administration of the Net Winner Class.

Dated: July 30, 2014

Respectfully submitted,

/s/ Irving M. Brenner

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 30, 2014, I electronically filed the foregoing **RECEIVER'S MOTION FOR CLASS CERTIFICATION** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record. The Receiver also will email a copy of this motion to the proposed class members and publish a copy of the motion on the Receiver's public website [zeekrewardsreceivership.com](http://zeekrewardsreceivership.com).

This the 30<sup>th</sup> day of July, 2014.

s/ Irving M. Brenner  
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