

Cause No. 296-04376-07

[REDACTED], PLAINTIFF

VS.

**ADVANTAGE CONFERENCE, LLC
Timothy S. Darnell, individually
Jack M. Weinzierl, individually
James McHugh, individually
Defendants**

**§ IN THE DISTRICT COURT
§
§ 296TH JUDICIAL COURT
§
§
§
§
§
§
§
§ COLLIN COUNTY, TEXAS**

**DEFENDANT'S REQUEST FOR DENIAL OF PETITION FOR
SUMMARY JUDGMENT**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant, Jack M. Weinzierl ("Defendant"), acting in behalf of himself, moves for denial of petition for Summary Judgment - Cause No. 296-04376-07 filed by Plaintiff, **[REDACTED]** ("Plaintiff") in the District Court, 296th Judicial District.

Defendant also request that Dobrott, having no official connection with this case or Company, not be admitted into the hearing.

Defendant at this time is representing himself due to the financial condition caused in large part to the Plaintiff and this continued lawsuit, Pro Se, and begs the leniency of the court for not knowing all legal details and intricacies as to strict form and procedure.

Plaintiff's Motion for Summary Judgment - Response

Defendant strongly denies accusations contained in this Cause as completely unmerited, frivolous, distorted, and categorically untrue. Motion and Plaintiff's affidavit contain blatant lies throughout. Plaintiff has purposely maligned, mischaracterized, distorted, and disparaged the nature of Defendant's character; the business model of Advantage Conferences, LLC (Company); Company's products; Company's promotional messages; Company's method of doing business; Representations of Company to Candidates and Representatives; Company's treatment of Plaintiff; Company's Representatives; along with several other items relating to Defendant for the sole purpose

of harming Defendant, Company, Darnell, and Representatives. Plaintiff is unquestionably seeking unwarranted monetary gain by virtue of constant harassment over the past four years, blatant defamatory postings, and misuse of the judicial system and the District Court as evidenced in this filing against Defendants.

Motion for Summary Judgment

Plaintiff's primary assumption (Section III-1) is the erroneous and insulting assertion that Company is an illegal pyramid scheme. Dobrott has continuously posted this defamatory, incendiary, and gross distortion on hundreds of public postings and an attack website against Company on the Internet.

In all fact, Company is in no way an illegal pyramid scheme. Company is a fully compliant Direct Sales company that advertises and sells printed and digital (Compact Disc, Digital Video Disc) training modules; live Mindset Mentoring Tele-Conferences, Training Webinars, and live Conference events. Chartered in June, 2003, Company has excellent customer service and immediate accessibility and availability for all customers and Representatives from 9:00 AM through 5:00 PM, Monday through Friday.

Regarding the "pyramid" question, Weinzierl was informed that the Company has received full review and scrutiny from the Texas Attorney General's office, in particular the Texas Attorney General Pyramid Division, which upon full investigation gave Company a clean bill of health. Had the Company been in violation of pyramid laws, according to the State Official that called Darnell were and are required by law to shut down and prosecute accordingly. After a thorough investigation, their findings, in the words of the Officer in charge of the Pyramid Division, "Mr. Darnell, you have nothing to be concerned about. In fact, there is no way on this planet that your company is a pyramid." Clearly, there have been no arrests, nor has there been so much as a warning or mention of any problems by the AG's office to Defendant, or about the Company whatsoever.

Dobrott believes that a single characteristic of a Company that is similar to what she's read about "pyramids" automatically makes that company a pyramid. This is simply not reasonable. Virtually any business has features that remotely resemble non-legal entities. Darnell has been a business owner all of his professional life, and would never create a business that could be deemed illegal. There's simply nothing to gain and everything to lose. Professional business people don't go around making the "layman" mistakes that a non-experienced business person is prone to make.

The "pyramid" allegation is one of a myriad of delusional fabrications emanating from the instigator of this lawsuit and one prior lawsuit, Heather Dobrott, whose affidavit was included with Plaintiff's Motion for Summary Judgment. Due to no association or past involvement with the Company or Darnell, other than incessant written/posted attacks, Dobrott has resorted to using other individuals, particularly in this case, the Plaintiff, to attempt to prove a litany of self-fabricated hypotheses and validate her hobby of attacking businesses and individuals on the Internet. Dobrott has also continued to

attack Weinzierl targeting his current colleagues in another company with disparaging posts online and via email. Dobrott is harming Weinzierl's ability to earn a living, as well as worship freely at his church, due to damaging emails sent to his pastoral staff.

In spite of numerous written, packaged and telephonic complaints over the past four years manufactured and delivered to various agencies by Dobrott, there are no legitimate grounds for any of the allegations or accusations whatsoever. Dobrott, has sent multiple packages of so-called evidence, and/or made multiple visits and phone calls to the Texas Department of Insurance, The Federal Trade Commission, The Texas Attorney General, The Better Business Bureau, Defendant's Church, The Allen Police Department, Company Conference locations, and others – all of those actions bragged about in some 2,300 plus web postings containing vulgar, disparaging, and histrionic accusations and allegations against Weinzierl and fellow Defendant, Darnell. Dobrott has, in similar language libeled Darnell's father, a life-long Christian Pastor, and Weinzierl's, brother, also a life-long Christian pastor. Dobrott, according to her own testimony is not a member of a church, nor does she attend a church.

Dobrott even bragged in postings that she was going to visit Darnell's two teen-aged daughters' High School in order to humiliate them in front of their classmates. Amazingly, Dobrott **did indeed visit Darnell's daughters' High School**, but thankfully only got as far as the principal's office.

This lawsuit has been instigated and at least in part, if not fully, paid for by Dobrott, who has no reason or any connection relating to Defendant(s) or Company in any way. She has never been a customer, Representative, or associate of any of the Defendants or Company, yet has made it her self-created mission to, in her words, destroy Darnell and Weinzierl's reputation and put them out of business.

The erroneous and inaccurate nature of her incessant allegations have in fact been proven over and over again, including a legal decision in the first litigated case instigated by Dobrott, where Darnell's charitable foundation was erroneously (and similar to this lawsuit), accused of being fraudulent. Dobrott and Plaintiff characterize all personal and business activities and companies owned by or associated with Darnell and Weinzierl as criminal and fraudulent. Dobrott has issued vile diatribes against several other Direct Sales companies other than Advantage Conferences as well and sees all home business opportunities as "scams." She is entitled to that bias, but she is very wrong and has taken her bias to destructive lengths.

The fact of the matter is that "home-based business", "Direct Sales," aka "Network Marketing" is a \$30.80 Billion dollar (US) industry, with over Seven Million (7,000,000) Americans participating in the United States alone, and Sixty-Seven million (67,000,000) people worldwide, and growing rapidly. More than 300,000 participants in the U.S. are over the age of 65. More than 500,000 participants in the U.S. have some kind of disability.

In addition, some of the greatest names in American business are integrally involved in the Network Marketing, Home-based Business Industry. **Billionaires, Donald Trump, Richard Branson, and Berkshire Hathaway's, Warren Buffett all own Network Marketing companies.**

Direct Sales opportunities, such as offered by Advantage Conferences, LLC, are the only option for countless individuals, and the method of choice for income generation for millions of others. As stated by **former President Bill Clinton**, Direct Sales, in a video posted on March 25, 2009 on YouTube, Direct Sales (aka, Network Marketing) is the epitome of the American spirit. Clinton states, "...you strengthen the economy and our country by offering opportunity to others..."

Opportunity is not a guarantee, rather it is an option that can save homes, pay bills, and replace lost income from lost jobs. In some cases, it can help a person become financially independent. Success requires hard work and can be hastened by Mentoring and Training on an ongoing basis, which is the crux of the Advantage Conferences product content and reason for its existence. Advantage Conferences purpose is to help people clearly understand exactly how to achieve those important and worthwhile goals, while avoiding as many of the commonly made mistakes as possible.

In the initial lawsuit instigated by Dobrott, the **Judge ruled in Darnell's favor** due to the obvious non-meritorious and inaccurate premise of that suit, again in keeping with the inaccurate distortions of the multitude of allegations that Dobrott and Karelin have consistently alleged over the years. In spite of the judges' ruling in favor of Darnell, debunking Plaintiff's absurd allegation, Dobrott continues to smugly assert that the Foundation is fraudulent, as is evidenced in her affidavit and continuous postings on the Internet.

It is pertinent for this case to note that, according to Dobrott's sworn testimony in a defamation suit against Dobrott, Dobrott is unemployed. She is not only currently unemployed, Dobrott has never had a job in her life – nor has she ever owned or participated in a business of any sort. The allegations and accusations have been emanating incessantly for four years from this person who is ignorant of the nature of business, due to lack of experience and even lack of any involvement in business. Dobrott is someone who, for mostly unexplainable reasons, has targeted Weinzierl, Darnell and Company on virtually a daily basis for four full years.

Darnell will present signed documentation signed by Plaintiff agreeing to principles and rules of conduct and operation of Advantage Conferences, LLC ("Company") Representatives in the original Company/Representative Agreement between Plaintiff and Company, as well as Policies and Procedures Manual applying to all Company Representatives utilized by Defendant, Company and Representatives as agreed-to, legal rules and terms of involvement. These documents set forth the agreed upon, signed (in writing) contracts regarding optional, voluntary and non-required purchase of any and all products offered by Company, including rules pertaining to refund.

Advantage Conferences, LLC makes certain that purchasers of all products understand and agree to the Texas Right of Rescission Law that gives a customer 72 hours (three business days) to request and receive a refund. [REDACTED] was not only aware of the voluntary and optional nature of the purchase, she was also aware of Company's contractual refund policy.

Plaintiff has made multiple contradictory statements regarding her involvement with Company, specifically regarding the issue of her demand for a refund in spite of her signed, contractual agreement regarding refund policy. After initially proffering several other reasons why she was due a refund, Plaintiff finally claimed she was not aware that she would need to fly to the Conference, and was not able to fly for health reasons.

Company's condition of refund required a Conference purchaser's attendance at one of the Conferences, and if an Attendee genuinely felt that the value of the Conference represented by Company was not worth the price, they could then request a refund following attendance. Plaintiff was aware that many Attendees chose to drive to the Conferences from different locations all over the United States and Canada, and that flying was not her only option to go to the events.

Interestingly, upon meeting Dobrott, and at Dobrott's promptings and payment for the flight, Plaintiff was all of a sudden able to fly to Dallas in order to meet with Dobrott regarding Dobrott's plan to litigate and extort monies from the Defendant and Weinzierl. Plaintiff, in complete contradiction to her statements about not being able to fly, was all of a sudden, amazingly, able to fly to Dallas to meet with Dobrott, a fact she conveniently leaves out of her affidavit – a fact that stands in clear contradiction to Plaintiff's affidavit.

Defendant's affidavit asserts that Company claims that Representative can "...make millions of dollars in a 'MATTER OF A FEW MONTHS'". (see III-3) This is an absolutely false assertion, again a fabrication by Plaintiff. As a matter of fact, Company consistently teaches the falsehood of "get rich quick" thinking. This verbiage never appeared in any Company produced nomenclature whatsoever and would never be allowed. Any Representative making any kind of statement remotely similar to this would be sternly instructed to strike such postings or printed materials immediately or **risk certain termination** as a Representative for the Company.

No trainer at Company has ever made any assertion that business or direct sales is "easy". The term, "easy" is literally prohibited from appearing in any Company nomenclature relating to making money in any business, including especially Company's business model. Plaintiff's affidavit goes on to recklessly and erroneously state, "Advantage Conferences promises recruits they can earn these huge incomes part-time (10-15 hours/week) without selling anything or even talking to anybody." Again, this is a total mischaracterization of the Advantage Conferences sales process, and a statement taken out of context at best. The only way a commission is created is from the transaction of a Company product(s) sale. Anybody with any business, sales, or retail

background understands this elementary business rule. It is only by the sale of a product that commissions are derived.

Plaintiff mischaracterizes Company's system, which is streamlined to deliver information to Representative Candidates regarding the Products, the Company, Product benefits, the Pay plan, the Marketing process, the Information system, and other appropriate subjects via printed and recorded information without the Representative having to attempt to deliver initial presentations on their own. Such systems are used by virtually all companies engaged in web commerce now, but Company's was one of the first to implement a system such as this that was beneficial for Representatives and Candidates. That same system not only delivers information about various aspects of the Company, it also enables a Representative to qualify those who were considering starting and running their own business. The system, in effect, gave enough information to assure that only those who felt like they were truly qualified would continue through the process of review of the products and opportunity, thus freeing Company Representatives from cumbersome and time-consuming activities that other direct sales opportunities require, like multiple phone calls to and with all Candidates.

Another surprising distortion reported in Plaintiff's affidavit is, "Advantage Conferences teaches its representatives that if a recruit asks, "what is your product?" that recruit is "not a prospect." (Plaintiff's affidavit, page 4 - #6) This is, as we have learned to expect, a truly ludicrous assertion. Advantage Conferences is and always has been very proud of its unique and powerful products. This statement by Plaintiff is in no way accurate. In fact, the exact opposite of Plaintiff's absurd assertion is true. Any question regarding any of the Company's products is viewed by their Representative as a positive opportunity to discuss the product. As any business owner or sales person knows, a question about a product is a "buying signal", exactly what a sales person wants to see happen! Prospects or Candidates need to be fully informed of all aspects of the program, products, commission plan, etc. Knowledge derived from answers to questions about the products or any aspect of the program helps a Candidate make an informed and more confident decision. Should a "prospect" request product information, this is always considered an excellent question and one that every Representative hopes will happen. For four years, we have constantly been surprised and reminded of the ignorance about business and our particular Company on the part of the Plaintiff and Dobrott, due to ridiculous assertions such as this one.

Again, the affidavit asserts that "Advantage Conferences' Compensation Plan Rewards Recruitment of Representatives, not Retail Sales of the Conference to Non-Participants in the Income Opportunity." The fact is, all sales at Advantage Conferences are "Retail Sales". Commissions are only derived from the sale of the product – not the sale of the opportunity. Plaintiff states that "no retail sales of the conferences have been made to a person not participating in the income opportunity." That statement is patently false, as well as misleading.

Advantage Conferences Products and Training Contents' focus is on helping Christian Entrepreneurs operate business more effectively and thereby improve their

bottom line profitability. The main change that a person needs to make in their life to increase their income is in their improved understanding about business, while dispelling common myths about the nature of money, business, leadership, productivity, profitability, and about people who are successful. Virtually all product purchasers choose to become a Representative, based on the relatively small extra charge of \$59.95, as well as for several other poignant reasons.

- a. The cost to enroll, at \$59.95 is relatively small, relative to a conference purchase, and gives the enroller access to Company training and communication to which conference or product purchasers (alone) would not have access.
- b. The \$59.95 enrollment fee added to a \$9,995.00 purchase is a sensible purchase decision. Most purchasers feel that they would be better served by including the Representative enrollment option in addition to a conference purchase.
- c. Tax Deduction: The conference, or any other Advantage Conferences product purchase, including the enrollment cost, may be tax deductible as a business expense. As always, we defer from offering direct advice at this point by telling purchasers to consult their tax attorney or CPA. From a dollars and cents perspective, a tax deductible purchase translates into an approximate 30% savings by the purchaser (more or less depending on the individual's tax bracket) versus that amount being taxable. If a person is not a Representative, that taxability or non-taxability status might or might not be claimed depending on their tax professional's opinion.
- d. Hundreds of Representatives (President's Interview, enrollment forms and \$59.95 required) have chosen not to purchase the conference. Others chose to purchase products other than the Conference, but not the Conference. Others chose to not purchase any product at all, but rather to enroll only. Those Representatives were and have been treated on an equal footing with anyone choosing to purchase any product or combination of products. Non-purchasers also had/have the opportunity to participate in earnings just as those who determined that the purchase option was right for them. To this day Advantage Conferences has Representatives who have been with the Company since its inception that have never purchased a Conference – dedicated and loyal Representatives that love the Company, the Products, and the opportunity. They've never purchased the conference, and while clearly understanding that that purchase is an option, have never felt pressured to do so.
- e. Congruence – the subject matter and content at Advantage Conferences is focused on being successful - creating greater income and financial stature as an entrepreneur. The way to become successful is to offer excellent value to more and more people as time goes on. Virtually all the other training

available on this subject is New Age (“The Secret”, “Law of Attraction”, Eastern Mysticism, or secular, devoid of Christian and Biblical discussion, which makes Company’s content unique in the marketplace, with few exceptions (especially in our earlier years). Many Christians don’t want to mention or proclaim Christ in the marketplace, and similarly, don’t want to discuss business or money (profits in particular) in Christian circles. We believe that genuine faith in Christ should be part and parcel to a person’s life, including in the course of doing business in the marketplace. Money is not evil. The love of money leads to problems, as Scripture so well teaches. Many Christians have hang-ups with money and profits, and part of Advantage Conferences training is to deal with fears and misgivings about profits, money, greed, leadership, and business in general. The Christian Millionaires that Advantage Conferences bring in are excellent examples of how one can often serve Christ to a greater degree due to access to greater resources, men and women who don’t lose their faith, but strengthen it while experiencing uncommon financial success.

The point of this section is to say that, it would be incongruent for a person to immerse themselves in the content, experiences, service and benefits provided by Advantage Conferences, and then not share the product(s), impact and process available at Company with other people. We encourage the profits that results from sales, and don’t have a problem with promoting products and services which are genuinely valuable to other people. In order to share this concept with someone else and be paid for it, one needs to be a Representative and have the Representative contract signed and accepted by the Company in order to officially represent the product and opportunity, and be compensated for the referral.

- f. Advantage Conferences teaches Christians to be aware of entrepreneurial opportunity and extensions from primary business endeavors that present themselves in the course of operating their primary business. A person desiring the product, but not wanting to be able to legally promote the Company’s opportunity aspect, would not be common sensical to most people.
- g. **Advantage Conferences does not need a single new Representative in order to create sales.** A pyramid requires new members constantly and if it ever stops, and all pyramids do stop by virtue of being shut down by law enforcement agencies, the newest “members” to come in lose their money.
- h. **Advantage Conferences sells products that the public wants and needs.** Pyramids do not have real products.

Advantage Conferences is proud of many of their Conference Attendees who were inspired by their involvement with Advantage Conferences, and re-directed in their business approach in a positive way due to the Mentoring that

they experienced on the ongoing Mindset Tele-Mentoring Calls and live Conferences. Mentoring provides a freshness and third-party stimulus that can truly help those who are stuck or frustrated with their business. The Tele-Mentoring Calls and the Conferences are both life-changing events to those who are seeking change. If a person is highly skeptical, derogatory, and belittling in their demeanor, mindset, language, and lifestyle as Ms. Dobrott has demonstrated over the last four years, they would never be able to understand the value of our content and training, which is one of the reasons she has such a distorted view of Company. Weinzierl personally attended live conferences over a 3 year period.

(Page 6 of Plaintiff Affidavit -#8) Again, another erroneous statement: Affidavit states: "Advantage Conferences entices recruits with the prospect of earning over \$1,000,000.00 in just 28 weeks as a result of the "Miraculous Power of 2." While earnings can be significant, no Representative has ever been told that they would earn over a million dollars in 28 weeks. That is another purposed distortion by Plaintiff, encouraged by Dobrott, and obviously Plaintiff's counsel. Affidavit purposely leaves out extensive information that was presented in writing and on recorded and live calls that explain the necessity of work, engagement in training, attendance on phone calls and training calls, and that earnings vary widely from Representative to Representative. Every single individual is a totally unique circumstance. Each has a different level of acumen and each will work at varying degrees of attention, duration, with differing levels of marketing and advertising budgets, and different levels of competence and effectiveness. Some Reps work full-time, but most work part-time; and some do absolutely nothing – each level of involvement is a personal decision on the part of each Representative.

(page 7 of Plaintiff Affidavit - #9) Plaintiff again distorts Company's stance on product purchases and takes statements out of context all attempting to denigrate and discredit Defendants and Company. In a live call training entitled, "Commitment", one of literally hundreds of Training Calls since 2003, the content discussed successful, long-term marriages versus those that ended in divorce. The training emphasized the concept of "Commitment" being key to successful relationships and marriages. Throughout all relationships, including marriage, couples will experience good times and bad times. Commitment means that couples will stay in a relationship, even amidst and especially in hard times, in order for the individuals to experience a successful marriage. Darnell, who conducted that training, noted that people who commit to their marriages are the ones who are more likely to stay married and report higher satisfaction levels. Those who don't fully commit to their marriage often end up divorced. The lesson to learn is that one should commit to their marriage at all costs.

The training proceeded to talk about commitment as regards employment. In a job, if one is not committed to showing up to work over the long term, their employment status with that company would definitely be in jeopardy. In fact, if

one doesn't show up for work, that is a circumstance not unlike employment or job suicide – that person would assuredly lose their job.

Other examples were used which led to the importance of commitment to one's business. Lack of commitment to a business is indeed business suicide. In our type of business, direct sales, a person has an option to purchase the product, or not purchase the product. If an individual has the wherewithal to purchase a product, then they should make that positive decision. If they can't afford the product – any product, then they should not purchase that product – plain and simple. Regardless, the Company does not coerce a person into buying anything. In fact, the Company has turned down many people from becoming Representatives, based on their not being a good fit for that role (Representative) with the Company, even when it was clear that they had funding to purchase the conference and/or the enrollment.

With that being said, having, owning, and experiencing a product that a person represents will always be beneficial to their ability to represent the product and opportunity with more knowledge, expertise and enthusiasm. There is no question that it is better to personally experience one's choice of products, than attempting to represent a product without personally experiencing firsthand it's benefits. That fact is obvious to any business person. But even so, it is a business concept that should be discussed from time to time.

It is a business fact that, in order to successfully promote a product, regardless of whatever product it might be, first-hand, personal knowledge of that product will be beneficial to whoever chooses to promote that product. That simple concept applies to every company and every product, including Advantage Conferences product(s). If you are going to sell Buicks, then you would do a much better job of promoting and selling, by owning and driving a Buick and not some other brand.

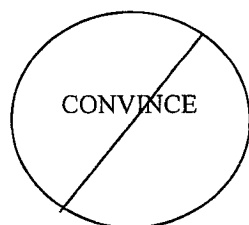
If a person has the funds to purchase for example a \$100.00 product, or any product at any price point that they intend to represent, but shies away from making that commitment, then that lack of commitment will not bode well for the future success of that representative. Any business person or entrepreneur of any significant experience knows this fact, and would reasonably conjecture that, given other factors being equal, less success for that particular person would be likely. Less success would even be predictable. In the event that a Representative is not able to make a product purchase, if that Representative can somehow make a deep and genuine commitment to promoting their product, then they will predictably be successful. In either case, choosing to purchase is better, but "Commitment", with or without a purchase, is essential.

What would be disingenuous on the part of Advantage Conferences training would be for the company to not address this issue and simply ignore the fact that commitment to one's business and personal product knowledge wouldn't

make a difference. The fact of the matter is, both commitment and personal product knowledge (gained by personal use) do increase the likelihood of success, while failure to commit to one's business, and failure to embrace a product on the part of a Representative would be predictably inhibitive to their success. These concepts are basic, simple business realities that Tim Darnell did not invent. Most people, even non-business people understand this concept intuitively, and without need for much explanation. Advantage Conferences unapologetically teach business principles such as these, routinely, because they need to be discussed and understood.

To somehow create the allusion that we're guilting, inducing, or pressuring people into purchasing is absolute nonsense, and shows total ignorance of business and sales. Individuals that come into our business, especially those that have passed the President's Interview are all adults and are capable of making their own mature decisions. Mentors at Advantage Conferences rarely ask which product, if any, a Candidate Representative is planning on purchasing. In fact, the Company's Candidates need to *convince us* that they are capable of being here, are qualified to be here, and that they are teachable, willing to learn, and genuinely desire to create more income, regardless of what product they do or don't purchase, and regardless of what business they desire to represent. For instance, if a Candidate cannot effectively enunciate "why" they want to be a Representative for Company, and/or cannot properly enunciate "what they are looking to accomplish," that person would not be a match with Company philosophy and would therefore not be a good candidate for the company's mentoring/training, or for a Rep-ship with Company.

Company training routinely talks about not convincing anybody of anything, especially a purchase decision at Advantage Conferences. "Those convinced against their will are of the same opinion still" is a phrase the company Representatives hear constantly. The company routinely uses the graphic image of the word "convince" within a circle and a diagonal line – no convincing and certainly never anything close to "hard selling" at all is taught or tolerated.



A Millionaire Mindset is exactly what it implies – one must think in terms of changing their life financially in order for this to be a fit for them. They can eventually learn to think more like millionaires. They can eventually learn to think in terms of greater income amounts. If that is not their genuine desire, then they can simply stay with their former or current job or business along with their current income level. Part of the company's service is to bring in guest Christian Millionaire Mentors on Tele-mentoring Calls and live Conferences, thereby

offering our Attendees an in-depth understanding of how those highly successful people think. As has been demonstrated time after time, Millionaires do indeed think differently and process financial and business matters differently from those who think in terms of, say, \$40,000.00 a year. The Mindset of successful Entrepreneurs and Business Owners is virtually 180 degrees different from those who are employed - and light years different from those who have never even had a job – one of the main reasons Dobrott has levied her campaign against us for years. She thinks differently than business owners, entrepreneurs and certainly Millionaire entrepreneurs think. We don't put her down for thinking that way, but she has publically demonized and castigated our Company and Representatives for years because she doesn't understand what we stand for or how we think. She sees things in a totally different light from how entrepreneurs, business owners, and millionaires see things. She sees things completely different from Darnell and Weinzierl who operate as Christ-centered business men – another fact she has mocked, demonized and denigrated for years.

From the Company's perspective, Advantage Conferences provides an environment that is frank and factual about business and success. Many, many people hold mythical ideas about money and those who have become highly successful. One of those common, mistaken concepts held by the public sector that is discussed and taught at Company is "short-term thinking", versus long-term thinking. In a microwave, "pop-a-pill" society, long term thinking is somewhat uncommon – and actually more of a novel notion. The fact is, nobody who is in business that we are aware of uses the term, "get rich quick". That is a fallacy in thinking and terminology used and enunciated by non-business people who aren't in business, and therefore simply don't understand business. Long-term persistence is fully necessary for success as an Entrepreneur and for an Advantage Conferences Representatives as well. Amateurs see a home business and immediately enunciate knee-jerk terms, like "get rich quick scheme" and "pyramid" – very, very common and always by those who are ignorant of our industry.

The multiple dramas incessantly created and perpetuated by both the Plaintiff, and especially her associate, Dobrott, could only be concocted by someone unaware of how we do business or how successful business people think about legitimate business. Their assumptions are delusional, highly dramatic, and simply not factual. That ignorance of business has been manifested in horrible, defamatory postings and accusations for some four full years at this point, with all kinds of names and crude, derogatory descriptions of Defendants levied by Plaintiff and her cohort(s).

(page 7 of Plaintiff Affidavit - #10)

The Plaintiff is incorrect in her statement that Weinzierl participated in these pre-purchase conversations with the Plaintiff. It is also important to note that the person who introduced the Plaintiff to Advantage Conferences and who

was her main point of contact and company representative, is not named in this case, a one Doug VanDeventer.

(page 12 - section 12a): Advantage Conferences is in no way a pyramid scheme. That fact is known by industry professionals, including the determining and most important decision-making body, the Texas Attorney General's Office, specifically the Pyramid Division, according to Darnell. At Advantage Conferences, Representatives make income by virtue of successfully creating transactions, period. One can pile people into a business, but if no sales are made, money will not be made.

12b: The product is offered to the public primarily on the Internet, as public a venue as exists.

12c: Advantage Conferences offers a product, a pay plan, and a commission whereby someone, regardless of who they were, has the opportunity to create sales that generated \$7,000.00. They could do it once, and they could do it over and over again. Also, at their volition, individuals could quit, and they could make no money at all. Their ability to make money or not make money was/is in their hands. If they were predisposed to negative attitudes, drama-creation, and the blame game, then they could thereby choose to not be successful. All of these are options available to any and all people participating in business. Company teaches to work on and avoid negative thinking, blaming others, and creating stories about other people or companies without full information, including getting to know and talking to those that they might be inclined to demonize. These are basic principles – fundamentals taught at Company on a consistent basis.

~~_____~~ came to Advantage Conferences to create income. She qualified at the MMC-I level as quickly, if not more quickly, than hundreds of people prior to, or after, her involvement. She was already successful and had already earned her first commission. Rather than staying the course, she regrettably, and against our counsel, unadvisedly quit. Quitting is never the answer. It is, however, the sure way to lose money in any enterprise. We repeatedly urged her to regain her composure and not quit, but she refused to listen or engage in civil dialogue. If a person were to purchase a restaurant, and things didn't go exactly the way they imagined in the beginning (and they never do), they cannot walk away or quit without losing some or all of their capital. Personal decisions must be honored by the person making the decision. If they dishonor their own decisions, then they are the ones culpable for their decisions and negative outcomes.

12d: Non-factual statement, lie, on the part of the Plaintiff once again. Nobody has ever stated or even thought/considered that anybody would make millions of dollars in "a matter of a few months." No guarantees of any sort, certainly none involving quick time frames have ever been made. Furthermore, the only guarantee in any business is that if one quits, they are guaranteed to lose.

The Company offers a great opportunity with a tremendous upside, conceptualized and formatted to fairly benefit cooperative, engaged Representatives. The potential at Advantage Conferences is better than many direct sales opportunities, but the statements included in Plaintiff's statements are simply not part of our nomenclature or discussion. This is once again a lie and fabrication on the part of the plaintiff and her counsel.

12e: Again, the company's emphasis had always been on helping people learn how to develop greater income. If someone can't see themselves making greater income, the reality is that they certainly will not create greater income. On the other hand, what is another realistic option is that an individual can start a business and stay committed to it. Being committed, cooperating, and staying upbeat gives a person the opportunity to make money in any business of their own volition. What is also realistic is that some people choose not to commit to their own business or the Company by their own volition. What is also realistic is that some people choose to quit - of their own volition. In any business, including Company, when either of those things happen, against Company's counsel and training, then the outcome is that that particular individual will NOT make extra income in any amount, and is not entitled to any income in any amount. It is not the Company's obligation to reward anybody anything when they voluntarily join and then voluntarily quit. Quitting is not a wise financial decision, and it is in no way advised - yet the option of quitting is a Representative's prerogative.

12f: Advantage Conferences Information System does the initial work for their Representatives. That way they don't spend hours on the phone recruiting, convincing, and selling as with other systems. Company's system of delivering the initial information to Candidates is spelled out very clearly in the literature and in the trainings as to when and where the Rep comes into the picture. This section's premise, as with virtually every aspect of all of Plaintiff's assertions, is a mischaracterization of the company's process and Company, designed to denigrate, as usual.

12g: Advantage Conferences product is directed toward business owners and helps people think like business owners, not employees, and not think of themselves as people who are broke, desperate, or victims. The focus is success. The focus is placed on developing a Millionaire Mindset, not a \$50.00 or \$100.00 mindset. While some of our products provide commissions in lower denominations, a primary concept with the Company is to think in terms of bigger dollar amounts like successful entrepreneurs and millionaires do. It is a focus also on removing limitation thinking that average individuals grow up with, to which they have been conditioned - problematic, non-resourceful thinking that successful entrepreneurs learn to eliminate.

12j: For a very brief period of time, and only after Company had submitted an application to join the BBB, paid the enrollment fee, and shook the BBB representative's hand after the transaction had been completed - upon receiving

his words of welcome and congratulations, Darnell assumed the company were members. At that point, Darnell put a “BBB” phrase in the signature of his personal e-mail address. Nobody thought enough of that membership to even announce it. The only reason application was made was to not have to explain to one or two people each month why membership in the BBB wasn’t important. To somehow characterize this event as a lie is a distortion, as usual, on the part of Plaintiff. Darnell had been a member of that organization in years past, and found it to be non-consequential either way. Company had chosen to not be a member for many years. Membership in the BBB was an insignificant detail of very little importance at all for the Company’s operation, and indeed was, and is still seen as a negative by many, many independent business people - not the assumed positive view that the public generally maintains. Within moments of learning that there was an issue with membership, Darnell simply deleted the BBB verbiage from Darnell’s personal e-mail signature.

13: Trainings consisted of 6-8 training calls each week. One of hundreds of diverse subjects pertinent to generic business and the AC business would be “how to grow one’s business.” Unbeknownst to a non-business person is that business growth does have benefits – one of which is addition, eventually multiplication, and in some cases, exponential financial growth. Growth and profits are somehow demonized by some people, and particularly non-business people who think of business and money as not good, and even evil. The company does not teach that money and business are evil. The company does not teach that “profit” or “income” are evil words or concepts. Indeed, as Plaintiff has stated, creating income and improving her retirement were the reasons she enrolled in Advantage Conferences. Yet, by rejecting her involvement, which she or any Rep is fully at liberty to do, she, of her own volition rejected income that could have resulted. Due to her decision, she opted to lose the opportunity to create income that she was well on her way to accomplishing. Plaintiff had actually created income as fast or faster than some of top earning Reps of all time, yet rejected that income by virtue of quitting.

Furthermore, we were proud of the Company’s federally registered compensation structure. Unlike other plans that are designed to pad the pockets of the Company, the Reverse MarginSM plan allows a person like the Plaintiff and other Company Representatives to create incomes that other plans simply do not.

14: The Company would not tell anybody that it is a pyramid when it is anything but a pyramid.

16. Points presented by Plaintiff are categorically inaccurate and completely untrue. Company relies on signed, legal contracts that assert our agreed upon obligations; and the Company will produce witnesses with first-hand knowledge of the inaccuracies contained therein - sworn testimonies that controvert Plaintiff’s concocted, negative observations and allegations against Defendants jointly and severally.

Affidavit of [REDACTED]

6. This is absolutely false and a lie. Nobody can predict when another person is going to make a sale. Darnell has never stated this under any circumstance. No promises and no guarantees are made “when” somebody will create a transaction. Regarding the \$100,000.00 income “promise” – again a total fabrication and statement taken out of context. Should a Representative want to make that amount, they would want to visualize that amount or any amount they seriously desire. That does not translate into, “I promise you will make that amount or any amount.” There are hundreds of other statements regarding details of marketing efforts made in a discussion such as this that describe with clarity what Representatives need to do as regards work and effort. Nobody walks into any business and is carte blanche told they’re going to make any amount in a commissioned pay plan, especially without taking into account their personal level of involvement, marketing commitment, lead generation, and effort. This statement by Plaintiff is insulting, disingenuous, and bears absolutely no resemblance to Company’s representations and methodologies.
7. Insulting and disingenuous again. The Company does a **visualization exercise** that has people (adults) to imagine having a successful business with multiple sales. This is another childish statement on the part of Plaintiff. Income, athletic, and business coaches use visualization exercises universally. They are designed to help people imagine high performance accomplishment, versus the constraining and limiting thoughts that keep people at a given performance and/or income plateau.
8. If a person wants to make a purchase, they rarely have money sitting in a bank account. Few entrepreneurs when desiring to start a business or making a purchase, ever have money lying around under a mattress. They have to be resourceful and the methods of finding funding vary, but certainly could include some of the sources mentioned in this section.
9. What people is the Plaintiff referring to? Although technically, Weinzierl personally had a business valued at a \$1 million+ at the time, nobody claimed to be millionaires other than the Mentor Entrepreneurs we have brought in to speak at the Millionaire Mindset Conferences (now Mindset Mentoring Conferences).
10. Advantage Conferences original model was to have smaller conferences with 30 or less Attendees. It became apparent with the reception by the market that it would be less costly and more prudent for the Company to have larger conferences with less frequency. Plaintiff’s assertion that “All the speaker’s names and the business they were in were withheld until one arrived at the conference. This information was withheld deliberately so people had to

attend the Conference.” This statement is truly too ridiculous to warrant a response. The speakers were in virtually every case and by design, unknown to the public, yet highly successful in a variety of sectors. Other companies bring in “Brand” speakers who are highly accomplished presenters, usually authors. Company’s model was and is designed to find common, ordinary individuals who have had success in, for the most part, non-glamorous industries – industries such as plumbing, for example. Nobody was victimized by knowing or not knowing who the speakers were going to be.

Years later, prior to the sixth MMC, Company posted names and backgrounds of the upcoming speakers to great detriment due to Dobrott’s decision to call all of them to tell them that, among other incendiary and derogatory accusations, they might be sued if they appeared at our conference. At the last minute, three of the speakers pulled out which was designed by Dobrott to cause damage to Company and the event. This act and other similar acts on the part of Dobrott constitute tortuous interference with contractual relations.

11. This assertion is another lie by Plaintiff. There were no provisions or special designations for “International Reps” at the time of Plaintiff’s involvement. Although not surprising, this is the first the Defendant has heard of this angle of rationalization from Plaintiff.
12. TM marks were edited on a portion of the website at the advice of the company’s attorneys. Marks are there to protect Company’s intellectual property from competitor companies. Company relied on a former “common law” approach to placing marks that now requires application and lengthy processing periods.
13. See item 12j under first section responses.
14. Plaintiff contacted Weinzierl stating that she had negative prospects and someone referencing negative posts on scam.com by Plaintiff’s friend, Heather Dobrott. Plaintiff was told to just delete negative responses, as the product and business opportunity are simply not a good fit for everyone.
15. See McHugh’s response
16. – 20 Plaintiff paints herself as completely incompetent, as having no mental capacities, and as an utter victim, totally coerced with no culpability, control, or common sense whatsoever. In her President’s Interview, she presented herself as smart, competent, and clear about all aspects of the program. She indeed was successful here and could quite conceivably have created enough commission to recoup the cost of the conference in virtual record time relative to other Reps had she not quit of her own volition. She should be thankful that her sponsor, McHugh, worked diligently to help her earn qualified status

at the MMC-I level with “his” prospects and not hers. Few Representatives if any received that kind of support and help.

21. Darnell and the Company stands by the statement that these commissions were/are possible, realistic and were made by multiple individuals – who didn’t quit their business. The System was powerfully constructed, Representative-friendly, and effective. Had Plaintiff not quit and become so belligerent to Defendants, she too could have experienced income with her home business. Plaintiff’s cohort, Dobrott, began doing everything in her power to convince Reps to quit, and if Plaintiff is a victim of anything, it is falling prey to such a negative influence as Dobrott. Dobrott has been prodigious in her postings and complaints, self-promotion and meddling with business to which she has no connection. Again, she had/has no legitimate connection to Company, Defendant, Darnell, McHugh, or any other Representative or Company staff members in any way, whatsoever. Those postings by Dobrott, including a defamatory, derogatory, highly speculative website were designed to malign and damage our reputations collectively and individually, and she indeed did tangibly damage to the Company’s ability to provide product effectively and conduct business effectively.
22. In stark contrast to what Plaintiff asserts, she did attend several trainings and we have a very positive, happy, unsolicited, and voluntary testimonial from Plaintiff, stating that she loved the training, and was receiving great value and support from Darnell, Weinzierl, and several other Representatives, which was her public statement and indeed the truth. Darnell was and has always been available for e-mail exchange, personal telephone dialogue, three-way calls with her, and any of her Candidates, and any kind of help she requested. He has trained regularly on multiple calls every week. Additionally, Darnell did indeed speak with Plaintiff, as did Weinzierl personally on multiple occasions prior to Karelin’s meltdown.
23. This statement is absurd, shifting all the blame to anybody and everybody but the person who caused the loss of income, Plaintiff herself. Plaintiff’s strategy is to demonize Darnell, Weinzierl, and McHugh as monsters who have no compassion and no business scruples. That is a complete mischaracterization designed only for her to attempt to extort hundreds of thousands of dollars from those who did nothing but try to help her. Had Plaintiff heeded the pleas of Darnell, Weinzierl, and several top leaders at AC, she would have listened, regained her composure and been able to succeed after an excellent start. Her defamatory, vile, and profane e-mails to Darnell and Weinzierl are indicative of behavior that served to harm everyone concerned, but most of all, herself.

Affidavit of Heather Dobrott

Ms. Dobrott has no connection to the Company from the standpoint of being a past customer, vendor, employee, romantic relationship – or anything that constitutes her right to attach herself to Defendants. She delights in brutalizing and maligning others consistently – in particular Darnell and Weinzierl and Defendants will produce boxes of postings to the court that show this to be true - the shocking, demeaning and inaccurate language that comprises angry, almost daily assaults on so many people. It is truly hard to imagine anyone that lives their life and treats others in the malicious and consistently derogatory way that she has for years and continues to do.

As with the case that she instigated with Judy Sterling against Darnell's Foundation, **Defendant(s) request the Judge and Court that Dobrott not be allowed in these proceedings.** She was not allowed (asked to leave) in the courtroom by the Judge in the previous case. Dobrott is an outside, unconnected to Advantage Conferences belligerent that simply seeks to destroy reputations and intrude on the lives and businesses of well-meaning, law-abiding, high integrity business people. She has hurt hundreds of existing Representatives who have been dependent on and hopeful in Advantage Conferences to produce income for their families, but because of the plethora of negative postings found in Google and Yahoo searches, they found it next to impossible to attract business. She has stopped hundreds of Representatives from proceeding forward with the products and services that Advantage Conferences offers to the public.

Dobrott has metaphorically yelled "fire" in the movie theater in close enough proximity (public, high-ranking Internet postings in the search engines in particular) that everyone considering going to the theater or in the theater hears and is alarmed and frightened. Unlike her, they don't see or smell a fire, but just to play it safe, they stay away from Darnell, Company, Weinzierl and all Advantage Conferences Representatives, a fact in which she absolutely delights and boasts.

In publically accessible documents, Dobrott has called Darnell names such as: Charles Manson, Hitler, David Koresh, the Anti-Christ, a criminal, a bumbling buffoon, incompetent, no Christian, a scam artist, a Con Man, a blathering idiot, a child and the list goes on and on. She has stated on multiple occasions beginning in 2005 that "Darnell is going out of business." "Darnell operates out of his bathroom." *See document provided by Darnell, "(Tiny sampling of) Dobrott quotes posted on the Internet and available to the public)* This type of language and much worse has appeared in over 2,300 posts and counting. *See also box of postings (partial).*

On page 2 of Dobrott's affidavit, she states, "As time went on a number of representatives from Advantage Conferences contacted me." It is interesting when Weinzierl posted on scam.com asking for anyone who felt they were misled or harmed at Advantage Conferences, that he did not receive even one response over a several month period.

Dobrott has solicited and encouraged contact from Advantage Conferences Representatives on her blogs for years. She has constantly spoken of the Company's

imminent closing and failure, constantly denigrated Defendant's character, evil intentions, fraudulent business structures, and lack of intelligence which created fear among a handful of existing Representatives. Eventually Candidates, Customers and Prospects were able to see Dobrott's filth whenever Googling Defendants' names, and Company name. Her wild conjectures and histrionic interpretations of everything involving Darnell, Weinzierl, and Company as being evil and fraudulent created a cloud around an otherwise excellent business and social environment. You can do a google search on Jack Weinzierl and can see the harm her postings are doing to his reputation and business.

"They had been terribly harmed financially and emotionally by this venture and I had a number of them sending me what they had related to their involvement in Advantage Conferences." Company's Treasures for the Kingdom Foundation was established to help any of our Representatives who had fallen on hard times. We were able to help many Reps avert eviction and we helped multiple "in need" individuals and families by way of the Treasures for the Kingdom Foundation. By the time Dobrott had posted hundreds of postings about the Foundation, too, being illegal and fraudulent, donations dropped and the very people that Dobrott seems so concerned according to her affidavit about were not given much needed funds that we had been able to collect and distribute in prior years. This inability to give on our part is directly attributable to Dobrott's constant, voracious attacks on every aspect of our Company and Representatives.

Dobrott references, "an impressive article..." written by Craig Malisow, of the Houston Press. The article was laced with profanity and vulgarity, including the "F..." word – not at all impressive, but rather filled with anti-business, anti-corporate slurs and smug, demeaning, belittling comments about Darnell, our distinguished Millionaire Mentor panel, who are truly some of the top respected Christian businesspeople in the country, whose names we'll leave out of this affidavit for their protection. Malisow made fun of Darnell ruthlessly, as well as Darnell's Pastor father, Dr. David Darnell, along with Dr. Darnell's powerful presentation, and literally mocked the scripture that Dr. Darnell was using in his 40 minute devotional and Scriptural study. Dr. Darnell has a PhD from Duke University Divinity School and is an internationally published and recognized author and commentator. He is not a businessman. According to Dobrott, Dr. Darnell is a "conniving scammer," among many, many other derogatory names.

Impressive? Access the Houston Press's Twitter site and here is their current bio:

- Bio Houston's premiere alternative weekly. We might f**k with you. Katharine Shilcutt (@she_eats) tweeting.

Pull up another top five Google listing and we see: The *Houston Press* gives readers something they don't get anywhere else around here -- a close-up, behind-the-scenes look at what's really going on where they live. From the irreverent "Hair Balls" column to in-depth investigative and feature stories and entertainment coverage that includes probing of Houston's late-night club haunts by the "Nightfly," the Press looks to

scratch whatever itch its readers have. And now it's added its own blog, *HouStoned*, available 24/7 at www.houstonpress.com.

This is a counter-culture, drug and sex laced paper that could never appreciate what Company and Defendants stand for and promulgate. There was not a single word of praise or report of any good that Company or Defendants have done, and we are certain that that kind of "journalism," in solid stead with Dobrott, never will. The more lewd and negative the articles are in this publication, the more papers they sell.

In stark contrast, here are unsolicited responses Company received yesterday alone. This is not fabricated. They are unedited, and not a single comment was asked for or encouraged. The date and time stamps are on the postings. This is typical of the responses the Company receive constantly with hundreds of testimonials archived – many are multiple pages about the impact of what Company has done in peoples' lives.

1. This message was right on time for me. Thanks and may God bless and keep you and yours.



Ertha M Johnson said this on [September 2, 2009 at 2:47 pm](#) |

2. Thank you God bless



Min. Verlinh Meade said this on [September 2, 2009 at 3:07 pm](#) |

3. Tim Awesome what I needed to hear. God Bless.



Sylvia Shusher said this on [September 2, 2009 at 3:19 pm](#) |

4. Kindly continue to send the Footsteps of Faith Messenger. It has been a great blessings.

God bless you



alfred said this on [September 2, 2009 at 3:32 pm](#) |

5. YES! I want to keep receiving the Footsteps devotionals! I've missed them coming to my in-box and didn't know where they'd gone. Please do keep sending them.



Diza said this on [September 2, 2009 at 3:37 pm](#) |

6. thank you so much brother Tim for untiring work sharing the word of God into my life, the word has been blessing me with tremendous blessings. GOD BLESS YOU



RODRIGO LIMPOT said this on September 2, 2009 at 5:00 pm |

7. beautiful blog, mine's terrible, but got the info out
Nowrichman.blogspot.com 2 min. video



Tom said this on September 2, 2009 at 7:28 pm |

8. This was so uplifting Tim .



Larkin Pfeffer said this on September 2, 2009 at 9:04 pm |

Page 3: The BBB shows one consumer complaint against Advantage Conferences. In late 2005, coinciding with Dobrott's postings that were beginning to appear, they did "question" and scrutinize Company, yet never reached a conclusion from what they termed, their "ongoing investigation" of Advantage Conferences. It has been four years, and Company has not been contacted by or in communication with the BBB in years, nor is Company aware of any real, tangible investigation whatsoever. The Texas Attorney General's office, experts in pyramid law, was able to conduct their investigation and render a favorable conclusion for the Company from their investigation in less than a week's time.

The BBB has shown a bias against Network Marketing and Direct Sales Companies in case after case. After incorrectly posting that Darnell was the current president of a company he had officially resigned from more than two years prior to their posting, verifiable with a simple search of the Texas Secretary of State's website, Company had no choice but to litigate in order for them to correct their statement. Prior to litigation, Company had repeatedly requested the corrections, while showing full, available to the public documentation to the contrary of their post. BBB finally mitigated their language sufficiently.

Page 4: We will be glad to bring a representative of the BBB into the courtroom to refute what Dobrott asserts: "From the Better Business Bureau case court documents Advantage Conferences as adjudicated to be a pyramid scheme." Again, a distorted outcome of that litigation.

Dobrott "calculate(s) a 98% loss rate for the representatives." Ms. Dobrott is an expert in so many areas, and we see now that accounting is one of her strengths. Since she views Company as a money making "scheme" only, she constantly leaves out the central premise of a PRODUCT. Company has delivered powerful products and services

for seven years now. The value of those products and services have constantly been described in nothing less than glowing terms by those using them. Since neither Plaintiff, nor Dobrott have used the product, their mention of the product is blatantly missing.

Since she views the Company as “a get rich scheme,” Company is a failure because people don’t get wealthy immediately. The fact is, hundreds of Company Representatives have received commission checks. In 2006 more than half of Company roster received at least one check. Company has several superstars, and also a list of people who did virtually nothing productive to build their businesses. Some quit on the five yard line, just as they were about to reap the rewards of their efforts. Business requires time, a point of training discussed constantly in our trainings and by our Mentors. But all experienced an extremely debilitating factor, and that was the voluminous postings by Dobrott, which, like a cancer inhibited Representatives from being able to function effectively. We will bring case study after case study to the trial that will testify to that fact. If Ms. Dobrott is concerned with a percentage that she feels is inadequate, she can look in the mirror and at the boxes of postings that made their way into the public sector and poisoned the futures of hundreds of Company Representatives.

Page 4: “...stranger owned life insurance program of Advantage Conferences, that had no policies written and representatives out thousands and tens of thousands in expected commissions that never materialized.” According to Dobrott, everything she looks at is fraud, victimization and loss. Advantage Conferences was approached by one of the very top insurance agents in the world about Premium Financed Life Insurance. Nobody, unless they purposely want to denigrate a person, group of people, and all companies associated with them would call the product, “stranger owned.” The product represented one of the largest asset classes in the economy, insurability of senior citizens. This was our first introduction to life insurance and we were impressed with the product. There were more than 132 companies nationwide that offered the product at the time. Several of our Representatives, including Darnell and Weinzierl, went through training and licensing.

One agent, again, the same person who sued Company’s Foundation, a former employee and subsequent accomplice to Dobrott, Judy Sterling, believed that she was due a large amount of commissions even though she made no sales. The premise is so ludicrous, it simply doesn’t deserve comment.

The company eventually found that they would do better to broaden our range of insurance products. Accordingly, the Company sought training from several professional insurance trainers for more universally sold products across a larger age span, including Permanent Life, Term, and Annuities.

Page 6: Weinzierl filed Chapter 7 bankruptcy due in large part to the damage that was done to his reputation, business and income from the allegations and postings from Plaintiff and more specifically, Dobrott. One can do a quick Google search and Jack Weinzierl and see what every potential business partner and potential employer sees, doing such a search. Dobrott’s claims that Weinzierl continued to promote himself as a

Millionaire Mentor after his bankruptcy filing and dismissal are absurd. In fact, Weinzierl lost his home to foreclosure and was forced to relocate September 1, 2009, due in large part to this 4 year long smear campaign by Dobrott. Dobrott's statement that Weinzierl cried of his desperate poverty is also another complete fabrication. Although Weinzierl was emotional at his bankruptcy meeting, Weinzierl wished to reaffirm his home to attempt to make good on a commitment, but to no avail. Yes, Dobrott did in fact post all of these bankruptcy documents purely for more public humiliation of Weinzierl and to damage Weinzierl and his business efforts further.

1. Dobrott has used Karelin, alleviating her from having to put her own name on the lawsuit, because she has no relationship with Defendants and Company other than a four year campaign to smear and denigrate every aspect of Defendant's lives, business, families, and professional activities.

2. Company has a signed contract with Karelin that stipulates exactly the terms of involvement and the terms of her voluntary purchase. This contract protects both the purchaser and the vendor, Advantage Conferences. Company has honored their role in the contracts and expects the Plaintiff to honor her contracts as well.

3. Company is not an illegal pyramid. We respectfully request that appropriate law enforcement agencies make those determinations, not an unemployed blogger who does Google searches.

4. Treasures for the Kingdom is indeed a viable and legal entity, as has been proven so in a court case instigated by Dobrott already.

5. Businesses are in desperate need of some form of regulation and protection from individuals who flaunt their "free speech rights" to mercilessly wage smear campaigns in the name of consumer protection, using faulty research, to which Dobrott admitted to under oath, with no recourse available to the business.

6. Company and Defendants have conducted honorable and indeed, exemplary business in the Direct Sales industry, including their initial promotional materials and the way they treat individuals. Statements taken out of context do not accurately represent thoughts and messages conveyed in the same and accompanying documents.

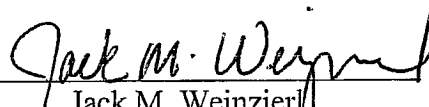
7. The Plaintiff's lawsuit is meritless and is simply an attempt to extort money for the Plaintiff, Plaintiff's counsel and Dobrott.

8. While Darnell and Weinzierl have compassion for anyone doing business with them, even if they choose to quit, when a Representative or former Representative shows no regard for their advice about what to do, but rather chooses to go in the opposite direction, that is not to his/her advantage. If they disregard their advice and counsel, yet still blame Defendants, Defendants cannot be held liable for their poor choice. Defendants cannot "make" a Representative make the right decisions.

Associates/Representatives who quit must be culpable for their actions, and the results of those actions.

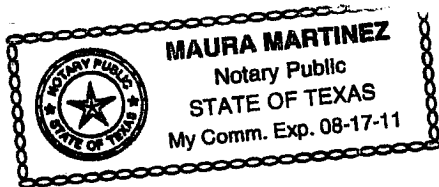
9. Weinzierl had no prior communication with the Plaintiff before the Plaintiff made her purchase decision.

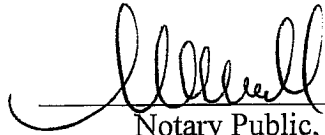
Further, Affiant Sayeth Not.



Jack M. Weinzierl

Subscribed and sworn to before me this 4th day of September, 2009 to which
witness my hand and official seal.





Notary Public, in and for the
State of Texas

LAW OFFICE OF

FOSTER & FOSTER, P.C.

ATTORNEYS AND COUNSELORS AT LAW
2701 N. DALLAS PARKWAY, SUITE 540
PLANO, TEXAS 75093
(972) 991-1606 TELEPHONE
(972) 673-0440 FACSIMILE

THOMAS J. FOSTER
SUSAN JOHNSON FOSTER

E-MAIL fostertj@flash.net
www.fosterlegal.com

August 11, 2009

Clerk of the 296th Judicial District Court
P.O. Box 578
McKinney, TX 75070

Re: Zena M. Karelin vs. Advantage Conferences, LLC, Timothy S. Darnell,
Individually, Jack M. Weinzierl, Individually, and James McHugh,
Individually.; Cause No. 296-04376-07

Dear Clerk:

Enclosed please find the original and one copy of Plaintiff's Motion for Summary Judgment. Please file Plaintiff's Motion for Summary Judgment, conform the Fiat, and return a filed-marked copy to the undersigned in the enclosed self-addressed stamped envelope. Thank you for your assistance in this matter.

Sincerely yours,



Thomas J. Foster

cc: **VIA CMRRR#70031680000271554335**

Advantage Conferences, LLC
c/o Timothy S. Darnell
1513 Home Park Drive
Allen, TX 75002

VIA CMRRR#70031680000271554366

Timothy S. Darnell
1513 Home Park Drive
Allen, TX 75002

VIA CMRRR#70031680000271554342

James McHugh
17215 Bradgate Ave.
Cleveland, OH 44111

VIA CMRRR#70031680000271554359

Jack M. Weinzierl
891 Wagner Way
Lantana, TX 76226