

NOTICE

IF YOU PURCHASED A HIGH SCHOOL DIPLOMA FROM BELFORD HIGH SCHOOL, A CLASS ACTION LAWSUIT MAY AFFECT YOUR RIGHTS.

A court authorized this notice.

This is not a solicitation from a lawyer.

YOU ARE NOT BEING SUED.

- Purchasers of diplomas from Belford High School (the “Plaintiffs”) filed a lawsuit against Belford High School, its purported accrediting agencies Universal Council for Online Education Accreditation (UCOEA) and International Accrediting Agency for Online Universities (IAAOU), several of Belford High School’s purported administrators and Belford High School’s purported owner, Salem Kureshi, and others (referred to in this notice as “Belford High School”) alleging claims for breach of contract, unjust enrichment and claims under the Racketeer Influenced Corrupt Organizations (RICO) Act. Plaintiffs allege that Belford High School is a complete sham, that its administrators and supposed accrediting agencies are fake, and that Belford High School is not legitimate or accredited. Belford has conceded that it has no building, faculty, administrators or accreditation.
- The Court is allowing the lawsuit to be a class action on behalf of all persons who reside in the United States and who obtained a Belford High School diploma at any time from January 1, 2003 to the present.
- There is no money available now, and no guarantee there will be. However, your legal rights are affected, and you have a choice to make now:

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
DO NOTHING	Stay in this lawsuit. Await the outcome. Give up certain rights. By staying in this lawsuit, you have the possibility of getting money or benefits that may come from this lawsuit or a settlement, but you have the risk that you will not get any money or benefit from the lawsuit. By staying in this lawsuit, you give up any rights to sue Belford High School separately about the same legal claims in this lawsuit. By doing nothing now, you will become a party to this lawsuit and join in the Plaintiffs’ theory for recovery.
ASK TO BE EXCLUDED	Get out of this lawsuit. Get no benefits from it. Keep rights. If you ask to be excluded and money or benefits are later awarded, you won’t share in those. But, you keep any rights to sue Belford High School separately about the same legal claims in this lawsuit.

Your legal rights and these options are explained in more detail in this notice. To ask to be excluded, you must act before **July 1, 2012**. Also, students who wish to get their own lawyer must do so by that same date.

- If you stay in the lawsuit and money or benefits are obtained from Belford High School, you will be notified about how to ask for a share. If you remain in the suit and money or benefits are not obtained from Belford High School, you will be notified of that as well.
- **After reading this notice, if you still have questions, visit:**

WWW.BELFORDCLASSACTION.COM

QUESTIONS? CALL (866)232-6589 OR VISIT [HTTP://WWW.BELFORDCLASSACTION.COM](http://WWW.BELFORDCLASSACTION.COM)

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BASIC INFORMATION

1. Why did I get this notice?

Information gathered in this lawsuit indicates that you may have received a diploma from Belford High School in the past. This notice explains that the Court has allowed, or “certified,” a class action lawsuit that may affect you. You have legal rights and options that you may exercise before the Court holds a hearing. The hearing is to decide the amount of damages to which members of the class are entitled against Belford High School. Judge Mark A. Goldsmith of the United States District Court for the Eastern District of Michigan is overseeing this class action. The lawsuit is known as *Lauber, et al., v. Belford High School, et al*, Civil Action No. 4:09-cv-14345.

2. What is this lawsuit about?

For years, Belford High School has operated websites at www.belfordhighschool.com and www.belfordhighschool.org holding itself out as a legitimate, accredited high school. Belford High School has claimed to have been accredited by UCOEA and IAAOU and represented itself as being an actual school with administrators, employees, instructors and a campus offering legitimate, accredited high school diplomas. Through these representations on its websites, Belford High School has sold thousands of documents to U.S. residents claiming that the documents were legitimate, accredited high school diplomas from an actual school. Despite the claims it made on its websites, Belford High School is not a real school, has never been accredited, and has never had authority to issue high school diplomas. As a result of Plaintiffs’ lawsuit, Belford High School has admitted that it has no administrators and never had any, that its supposed accrediting agencies were fake, that it has no employees and never had any, and that the names of faculty and administrators that appear on the diplomas it sold to thousands of persons around the United States are fake. This lawsuit is about whether U.S. residents who purchased Belford High School diplomas are entitled to damages.

3. What is a class action and who is involved?

In a class action lawsuit, one or more people called “Class Representatives” (in this case Elizabeth Lauber and Jaime Yanez) sue on behalf of other people who have similar claims. The people together are a “Class” or “Class Members.” Those who sued—and all the Class Members like them—are called the Plaintiffs. Those they sued (in this case Belford High School and its owner) are called the Defendants. One court resolves the issues for everyone in a Class—except for those people who choose to exclude themselves from the Class.

4. Why is this lawsuit a class action?

The Court decided that this lawsuit can be a class action because it meets the requirements of Federal Rule of Civil Procedure 23, which governs class actions in federal courts. More information about why the Court is allowing this lawsuit to be a class action is in the [Court’s Order Certifying the Class](#), which is available at WWW.BELFORDCLASSACTION.COM.

THE CLAIMS IN THE LAWSUIT

5. What does the lawsuit complain about?

In the lawsuit, the Plaintiffs say that they paid for legitimate, accredited high school diplomas that Belford High School held itself out to offer, but that they were harmed because Belford High School is not legitimate or accredited. You can read the Plaintiffs’ [Third Amended Class Action Complaint](#) at WWW.BELFORDCLASSACTION.COM.

6. How does Belford High School answer?

Belford High School agreed to the entry of a default against it for violating the Federal Rules of Civil Procedure in its defense of the case. Belford High School now admits that it has never had any accreditation, that the employees and faculty it claimed to have never actually existed, and the names and signatures that appear on its diplomas are fake. The default establishes as a matter of law that all the allegations made against Belford High School by the Plaintiffs in the Third Amended Class Action Complaint, are deemed true.

7. Has the Court decided who is right?

Because the Court entered a default against Belford High School, the allegations in Plaintiffs’ Third Amended Complaint are deemed true. On April 6, 2012, the Court entered a default judgment against Belford High School ruling that Belford High School is liable to Plaintiff and members of the class.

8. What are the Plaintiffs asking for?

The Plaintiffs are asking the Court to order Belford High School to pay Plaintiffs and members of the class money damages to compensate them for any harm suffered through Belford High School’s sale of fake high school diplomas.

9. Is there any money available now?

No money or benefits are available now because the Court has not yet entered a final judgment against Belford High School and because it is not known whether any assets will be available from Belford High School or another source to pay a judgment. There is

no guarantee that money or benefits ever will be obtained. If they are, you will be notified about how to ask for a share.

WHO IS A CLASS MEMBER?

You need to decide whether you are affected by this lawsuit.

10. Am I part of the Class?

Judge Goldsmith decided that any U.S. resident who obtained a Belford High School diploma at any time from January 1, 2003 to the present is a member of the Class.

11. Who is included?

The Class includes all persons who reside in the United States and who have obtained a Belford High School diploma at any time from January 1, 2003 to the present.

12. Are any Belford High School Diploma Holders Not Included In The Class?

If you are not a United States resident who obtained a Belford High School diploma between January 1, 2003 and the present, you are not included.

13. I'm still not sure if I am included.

If you are not sure whether you are included, you can get free help at WWW.BELFORDCLASSACTION.COM, or by calling the phone number or writing to the address listed in question 23.

YOUR RIGHTS AND OPTIONS

You have to decide whether to stay in the case or ask to be excluded before the hearing, and you have to decide this now.

14. What happens if I do nothing at all?

You don't have to do anything now if you want to keep the possibility of getting money or benefits from this lawsuit. If you qualify to be a member of the Class, by doing nothing you will be staying in that Class. If you stay in and the Plaintiffs obtain money or benefits, either as a result of a judgment or settlement or other actions, you will be notified about how to apply for a share (or how to ask to be excluded from any settlement). Keep in mind that if you do nothing now, regardless of whether the Plaintiffs win or lose at the hearing, you will not be able to sue, or continue to sue, Belford High School—as part of any other lawsuit or legal proceeding—about the same legal claims that are the subject of this lawsuit. This means that if you do nothing, you may only be able to sue for claims other than those raised in this lawsuit. By doing nothing, you will become a party to this lawsuit and join in the Plaintiffs' theory for recovery. You will also be legally bound by all of the Orders the Court issues and judgments the Court makes in this class action.

15. Why would I ask to be excluded?

If you already have your own lawsuit against Belford High School and want to continue with it, you need to ask to be excluded from the Class. If you do not want to recover damages from Belford High School on a theory that your Belford High School diploma is not real, you need to ask to be excluded from the Class. If you exclude yourself from the Class—which also means you remove yourself from the Class, sometimes called “opting-out” of the Class—you won't get any money or benefits from this lawsuit even if the Plaintiffs obtain them as a result of a judgment, or from any settlement (that may or may not be reached) between Belford High School and the Plaintiffs. However, you may then be able to sue or continue to sue Belford High School. If you exclude yourself, you will not be legally bound by the Court's rulings in this class action.

If you start your own lawsuit against Belford High School after you exclude yourself, you'll have to hire and pay your own lawyer for that lawsuit, and you'll have to prove your claims. If you do exclude yourself so you can start or continue your own lawsuit against Belford High School, you should talk to your own lawyer soon, because you may not be able to bring claims after a certain date.

16. How do I ask the Court to exclude me?

To ask to be excluded, you must send an “Exclusion Request” in the form of a letter by mail, stating that you want to be excluded from *Lauber v. Belford High School*. Be sure to include your name and address, and sign the letter. You must mail your Exclusion Request postmarked by **July 1, 2012** to: Belford Class Action, 6895 Telegraph Road, Bloomfield Hills, MI 48301.

THE LAWYERS REPRESENTING YOU

17. Do I have a lawyer in this case?

The Court decided that attorneys Thomas Howlett and Dean Googasian of The Googasian Firm, P.C., of Bloomfield Hills, Michigan, are qualified to represent you and all Class Members. The law firm is referred to as "Class Counsel." They are experienced in handling similar cases. More information about these lawyers, the law firm, their practices, and their experience is available at www.googasian.com.

18. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you will have to pay that lawyer. For example, you can ask him or her to appear in Court for you if you want someone other than Class Counsel to speak for you. If you choose to hire your own lawyer, the lawyer must file an appearance with the Court on your behalf, by **July 1, 2012**.

19. How will the lawyers be paid?

If Class Counsel get money or benefits for the Class, they will ask the Court for fees and expenses. You won't have to pay these fees and expenses. If the Court grants Class Counsel's request, the fees and expenses would be either deducted from any money obtained for the Class or paid separately by Belford High School.

THE HEARING

The Court may hold a hearing to decide what damages Class Members are entitled to.

20. How and when will the Court decide who is right?

The judge in charge of the case has ruled that Belford High School is liable to Plaintiffs for damages, and will decide Class Members' damages at a hearing unless the damages are determined otherwise. The hearing may be held in the United States District Court for the Eastern District of Michigan, Federal Building & U.S. Courthouse, 600 Church Street, Flint, MI 48502, in the Courtroom of the Honorable Mark A. Goldsmith. The Court has not set a date for the hearing. During the hearing, the Judge may hear arguments and evidence to help reach a decision about the amount of damages Belford High School owes Class Members. There is no guarantee that the Plaintiffs will win, or that they will get any money for the Class if they win.

21. Do I have to come to the hearing?

You do not need to attend the hearing. Class Counsel will present the case for the Plaintiffs and members of the class. You or your own lawyer are welcome to come at your own expense.

22. Will I get money after the hearing?

If the Plaintiffs obtain money as a result of the hearing or a settlement, you will be notified about how to participate. We do not know how long this will take or whether the Plaintiffs will obtain any money for the class.

GETTING MORE INFORMATION

23. Are more details available?

Visit the website, WWW.BELFORDCLASSACTION.COM, where you will find the Court's Order Certifying the Class and the Third Amended Class Action Complaint that the Plaintiffs submitted. You may also call (866) 232-6589, e-mail belfordlawsuit@googasian.com or write to: Belford Class Action, 6895 Telegraph Road, Bloomfield Hills, MI 48301 for further information.

DATE: April 30, 2012