

NOTICE

IF YOU PURCHASED A HIGH SCHOOL DIPLOMA FROM BELFORD HIGH SCHOOL, YOU COULD GET A PAYMENT FROM A CLASS ACTION SETTLEMENT.

A court authorized this notice.

This is not a solicitation from a lawyer.

- The net proceeds from a \$250,000 settlement will be used to pay claims of U.S. residents who obtained a Belford High School diploma at any time between January 1, 2003 and January 23, 2012.
- The settlement resolves claims brought on behalf of the certified Class of Plaintiffs in this action against Pitko, Inc., Tullow, Inc., Mivvel, Inc., Lateral Designs, Inc., IT Device Pro, Inc. and Payment Profs, Inc. (referred to in this Notice as the “Garnishee Defendants”) who Plaintiffs asserted held money belonging to Belford High School or that was taken from Class Members in connection with the Belford High School fraud.
- Court-appointed lawyers for the Class will ask the Court for reimbursement of costs, as well as an attorney fee award of approximately 30.6% of the net settlement fund for litigating the case, and obtaining and negotiating the settlement.
- The two sides disagree on how much money could have been won if the Class won at trial.
- Your legal rights are affected whether you act or don’t act. Read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:	
SUBMIT A CLAIM FORM	The only way to get a payment.
OBJECT	Write to the Court about why you don’t like the settlement.
GO TO A HEARING	Ask to speak in Court about the fairness of the settlement.
DO NOTHING	Get no payment. Give up rights.

- These rights and options – **and the deadlines to exercise them** – are explained in this notice.
- The Court in charge of this case still has to decide whether to approve the settlement. Payments will be made if the Court approves the settlement and after appeals are resolved. Please be patient.
- **After reading this notice, if you still have questions, visit:**

WWW.BELFORDCLASSACTION.COM

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BASIC INFORMATION

1. Why did I get this notice?

Information gathered in this lawsuit indicates that you are a Class Member in the Certified Class of individuals who obtained a diploma from Belford High School at any time between January 1, 2003 and January 23, 2012.

The Court sent you this notice because you have a right to know about a proposed settlement of some of the claims in a class action lawsuit, and about all of your options, before the Court decides whether to approve the settlement. If the Court approves the settlement and after objections and appeals are resolved, an administrator appointed by the Court will make the payments that the settlement allows.

This notice explains the lawsuit, the settlement, your legal rights, what benefits are available, who is eligible for them and how to get them.

The Court in charge of this case is the United States District Court for the Eastern District of Michigan and the case is known as *Lauber, et al, v. Belford High School, et al*, Civil Action No. 4:09-cv-14345. The people who sued are called Plaintiffs and the companies they sued, including Belford High School and Belford University, are called the Defendants.

2. What is this lawsuit about?

For years, websites at www.belfordhighschool.com and www.belfordhighschool.org held out Belford High School as a legitimate, accredited high school. In 2012, a judgment was entered finding that Belford High School was a fraud, that it is not a real school, was never accredited and never had authority to issue high school diplomas. As a result of Plaintiffs' lawsuit, Belford High School 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 were fake. This Judgment found that U.S. residents who purchased Belford High School diplomas are entitled to damages related to the amount paid for their fake diploma.

After the judgment was entered, lawyers for the Class tried to locate money belonging to Belford High School or one of the other Defendants to pay the judgment. The lawyers for the Class located money in accounts held in the names of the Garnishee Defendants that the lawyers believed actually belonged to Belford High School. The lawyers for the Class took steps to try to secure this money for the Class. The Garnishee Defendants and their lawyers opposed this and do not believe that the money belonged to Belford High School.

3. Why is this lawsuit a class action?

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." One court resolves the issues for everyone in a Class – except for those people who choose to exclude themselves from the Class. Judge Mark Goldsmith is in charge of this class action. More information about why the Court allowed this lawsuit to be a class action is in the Court's Order Certifying the Class, which is available at WWW.BELFORDCLASSACTION.COM.

4. Why is there a settlement?

The Court did not decide in favor of Plaintiffs or the Garnishee Defendants on the issue whether any money in the possession of the Garnishee Defendants belonged to Belford High School. The Plaintiffs think they could have won at trial. The Garnishee Defendants think the Plaintiffs would not have won anything from a trial. But there was no trial. Instead, both sides agreed to a settlement. That way, they avoid the cost of a trial and the people affected will get compensation. The Class Representatives and Class Counsel think the settlement is best for all Class Members.

WHO IS IN THE SETTLEMENT?

To see if you will get money from this settlement, you first have to decide if you are a class member.

5. How do I know if I am part of the settlement?

Judge Goldsmith decided that any U.S. resident who obtained a Belford High School diploma at any time from January 1, 2003 to January 23, 2012 is a member of the Class.

6. 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 January 23, 2012, you are not included. If you did not purchase a Belford High School diploma, but instead purchased another diploma such as a Belford University diploma, you are not a Class Member and you are not included in the Class.

7. 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 20. Or you can fill out and return the claim form to see if you qualify.

THE SETTLEMENT BENEFITS – WHAT YOU GET

8. What does the proposed settlement provide?

The proposed settlement generates a Partial Settlement Fund of \$250,000. These funds are currently being held by Class Counsel in an account for the benefit of the Class.

In the initial Class Notice sent by the Court, Class Members were advised that “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.” In accordance with these terms, Class Counsel are requesting that the Court grant a request for expenses and fees to be deducted from the money they obtained for the Class.

Class Counsel have paid more than \$64,000 in out-of-pocket costs on behalf of the Class in pursuing the case since the time the case was filed in 2009. These costs have been incurred for the expenses of litigating the case and include court filing costs, the costs of transcripts and deposition expenses, travel expenses, duplication of documents, legal research costs and other out-of-pocket expenses paid by Class Counsel. Class Counsel will be asking the Court to reimburse \$64,000 in expenses from the Partial Settlement Fund. Additional expenses will be incurred in connection with the administration of the settlement if approved, and Class Counsel will be asking the Court to approve an additional \$16,000 to cover the expense of a Claims Administrator who will review claim forms and calculate the amount each Class Member is to receive from the Net Settlement Fund. Class Counsel will be asking the Court for an award of \$52,000 in attorney fees, which is approximately 30.6% of the Partial Settlement Fund less these expenses. Class Counsel have spent more than 1,500 attorney hours litigating against Belford High School and the Garnishee Defendants since this case began in 2009. If the Court approves the request for costs and fees, there will be \$118,000 in a Net Settlement Fund for distribution to the Class.

9. How much will my payment be?

Your share of the Net Settlement Fund of \$118,000 will depend on the number of valid claim forms that Class Members send in, how much Class Members paid in connection with their Belford High School diploma, and how much you paid in connection with your Belford High School diploma. Here’s how it works:

Class Members wishing to obtain a share of the Net Settlement Fund will need to submit a claim form indicating the amount that they paid in connection with their Belford High School diploma. The Claims Administrator will total all the amounts paid by Class Members and then determine what percentage of that amount was paid by each Class Member submitting a timely valid claim form. The Claims Administrator will then calculate each claimant’s share of the Net Settlement Fund. The maximum payment that any Class Member will receive is the amount they paid in connection with their Belford High School diploma. If there are any funds remaining in the Net Settlement Fund after payment of claims, those funds will be used as the Court later directs. It is unlikely that you will get a payment for the entire amount you paid. The number of claimants who send in claims varies widely from case to case.

HOW YOU GET A PAYMENT – SUBMITTING A CLAIM FORM

10. How can I get a payment?

To qualify for a payment, you must send in a claim form. A claim form is attached to this Notice. You may also get the claim form on the internet at WWW.BELFORDCLASSACTION.COM. Read the instructions carefully, fill out the form, include all the documents and information the form asks for, sign it, and mail it postmarked no later than **June 12, 2017**.

11. When would I get my payment?

The Court will hold a hearing on **July 10, 2017**, to decide whether to approve the settlement. If Judge Goldsmith approves the settlement after that, there may be appeals. It's always uncertain whether these appeals can be resolved, and resolving them takes time, perhaps more than a year. Information about the progress of the settlement will be posted at WWW.BELFORDCLASSACTION.COM. Please be patient.

12. What am I giving up to get a payment?

By taking a payment you are giving up the right to try to get money from any of the Garnishee Defendants for what Belford High School owes the Class. The Stipulation of Settlement, available at WWW.BELFORDCLASSACTION.COM, describes exactly the legal claims that you give up as part of this partial settlement.

THE LAWYERS REPRESENTING YOU

13. 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.

14. 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 **June 12, 2017**.

OBJECTING TO THE PROPOSED SETTLEMENT

You can tell the Court that you don't agree with the settlement or some part of it.

15. How do I tell the Court that I don't like the settlement?

If you are a Class Member, you can object to the settlement if you don't like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must send a letter saying that you object to the settlement of *Lauber v. Belford High School*. Be sure to include your name, telephone number, your signature, and the reasons you object to the settlement. Mail the objection to the following three addresses postmarked no later than **June 12, 2017**:

Court

Clerk of the Court
U.S. District Court
Eastern District of Michigan
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd
Detroit, MI 48226

Class Counsel

Belford Class Action
6895 Telegraph Road
Bloomfield Hills, MI 48301

Garnishee Defendants Counsel

Todd Holleman, Esq.
Miller Canfield
150 West Jefferson
Suite 2500
Detroit, MI 48226

THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the settlement and payments of expenses and attorneys' fees. You may attend and you may ask to speak, but you don't have to.

16. When and where will the Court decide whether to approve the settlement?

The Court will hold a Fairness Hearing at **3:00 p.m.** on **July 10, 2017** at the United States District Court for the Eastern District of Michigan, Theodore Levin United States Courthouse, 231 W. Lafayette Blvd., Detroit, MI 48226, in the Courtroom of the Honorable Mark A. Goldsmith. At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. Judge Goldsmith will listen to people who have asked to speak at the hearing. The Court may also decide whether to approve the request for costs and attorney fees. After the hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take.

17. Do I have to come to the hearing?

No. Class Counsel will answer questions Judge Goldsmith may have. But, you are welcome to come at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

18. May I speak at the hearing?

If you are a Class Member, you may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter saying that it is your "Notice of Intention to Appear in *Lauber v. Belford High School*." Be sure to include your name, address, telephone number, and your signature. Your Notice of Intention to Appear must be postmarked no later than **June 12, 2017**, and be sent to the Clerk of the Court, Class Counsel, and Defense Counsel at the three addresses in question 15. If you wish to be heard in opposition to the settlement or the request for attorney fees or costs, you must include a written statement that indicates the basis for your opposition along with any supporting documentation. You cannot speak at the hearing if you excluded yourself or if you have not sent the Notice described in this paragraph.

IF YOU DO NOTHING

19. What happens if I do nothing at all?

If you do nothing, you will get no money from this settlement and you will be giving up the right to try to get money from any of the Garnishee Defendants for what Belford High School owes the Class.

GETTING MORE INFORMATION

20. Are more details available?

This notice summarizes the proposed settlement. You may obtain more details by visiting the Class website, WWW.BELFORDCLASSACTION.COM, where you will find the Stipulation of Settlement, the Court's Order Certifying the Class and the Third Amended Class Action Complaint that the Plaintiffs submitted, along with more information about the settlement including answers to common questions about the settlement, a claim form, plus other information to help you determine whether you are a Class Member and whether you are eligible for a payment. Information regarding the rights you are giving up in connection with submitting a claim can also be found there. You may also call (844) 320-4304, e-mail belfordclassaction@googasian.com or write to: Belford Class Action, 6895 Telegraph Road, Bloomfield Hills, MI 48301 for further information.

DATED: March 2017

QUESTIONS? CALL (844) 320-4304 OR VISIT WWW.BELFORDCLASSACTION.COM

RESPONSE DEADLINE:

**MUST BE POSTMARKED
NO LATER THAN
JUNE 12, 2017**

Belford Class Action Claims
PO Box 6878
Broomfield, CO 80021
1-844-320-4304

CLAIM FORM BY AFFIDAVIT

If you are a U.S. resident and you purchased a Belford High School diploma at any time from January 1, 2003 to January 23, 2012, you are a "Class Member" and you may be entitled to a share in the settlement proceeds. If you did not purchase a Belford High School diploma, but purchased another diploma such as a Belford University diploma, you are not a "Class Member" and you are not eligible to seek a share of settlement proceeds.

If you are a Class Member, you must complete and submit this form in order to be eligible for any settlement benefits. You must send the completed, signed form by first class mail, postmarked no later than **June 12, 2017**, to the following address:

Belford High School Class Action Claims
PO Box 6878
Broomfield, CO 80021

If you do not send in a signed, completed claim form to this address postmarked no later than **June 12, 2017**, your claim will be rejected and you will not receive any money in connection with the settlement. Do not send your claim to the Court or to any other address.

SECTION A. CLAIMANT INFORMATION

Class Member's Current Name

Class Member's Name On Belford High School Diploma (if different)

Street Address

City

State

Zip

Telephone number

E-mail

SECTION B – INFORMATION NECESSARY TO DETERMINE PAYMENT AND BENEFITS

You must provide certain information in order for the Claims Administrator to determine your eligibility for a payment from the settlement.

Approximate Date of Diploma Purchase: ___/___/____

Amount Paid: \$_____ (if you paid more than \$249 for your diploma you must attach evidence to support)

Attach a copy of your Belford High School diploma. If you are unable to attach a copy of your Belford High School diploma, attach evidence explaining why you are unable to do so.

HOW THE CLAIMS PROCESS WORKS

1. In order to receive any money or benefits from this settlement, you must submit a valid claim by June 12, 2017.
2. After you submit a claim you will receive a notice that your claim has been received.
3. The notice will contain the Claims Administrator's determination whether your claim is valid and your "Claim Amount," which is the number that will be used to determine the amount of your settlement payment. Your "Claim Amount" will be \$249 unless you provide evidence that you paid more or less than \$249 for your Belford High School diploma.
4. If you disagree with the determination whether your claim is valid or the amount you paid for the Belford High School diploma, you must write the Claims Administrator to dispute the determination and you must explain why you believe the determination is wrong. You must include documentation to support your explanation. If you do not dispute your "Claim Amount," this amount will be used to determine your share of the Net Settlement Fund. The Claims Administrator will be the final arbiter of all disputes relating to claims, claim amounts and the total amount of claims.
5. The Claims Administrator will determine the Total Claim Amount, which is the amount of all the claims and will determine what percentage your Claim Amount is of the Total Claim Amount. You will receive your share of the Total Claim Amount. Your payment will not exceed the amount you paid for your Belford High School diploma.
6. The Claims Administrator will determine what your payment will be and will mail you a payment check. This check will be mailed only if the Court approves the settlements and after any appeals are resolved. This may take time, so please be patient.

SECTION C – CERTIFICATION

By signing and submitting this claim form and pursuant to 28 U.S.C. §1746, I declare the following are true, correct and complete and I agree to the following terms and release of claims:

1. I have read and understand the Class Notice and I believe that I am a member of the Class and that I am entitled to a share of the Settlement Fund.
2. I understand that I will receive a notice from the Claims Administrator once my claim is received and that this notice will state the determination whether my claim is valid and my "Claim Amount." I understand that my payment will be determined using this amount unless I submit a letter disputing this determination pursuant to instructions provided in the notice and the Claims Administrator agrees to change the amount. I understand that the decision of the Claims Administrator as to the validity of my claim, the amount I paid, and my "Claim Amount" is final.
3. I understand that the information that I provide on this form is subject to verification, and I agree to cooperate with verification efforts by the Claims Administrator, Class Counsel or the Court.
4. I consent to the jurisdiction of the United States District Court for the Eastern District of Michigan with respect to any and all questions concerning the settlement, this lawsuit, or the validity of this Claim Form.
5. I understand that no one has offered me tax advice about the tax consequences of any payment or benefits received in connection with my claim and that it is my responsibility to determine any such consequences.
6. I understand that by submitting this claim I am barred from asserting, prosecuting, commencing, instigating or participating in the commencement, maintenance or prosecution of any action or other proceeding, in any forum, asserting any Settled Claims against any Released Persons as those terms are defined in the Stipulation of Settlement.

I declare under penalty of perjury that the foregoing is true and correct and I certify that all of the information I provided on this Claim Form By Affidavit is true, complete and accurate.

Signature of Claimant

Date