

**If you answered one or more prerecorded telephone calls between November 8, 2019 and October 25, 2023 from Citizens Disability, LLC, you may be able to receive a cash payment from a class action settlement.**

**A Federal Court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.**

A Settlement has been reached in a class action lawsuit against Citizens Disability LLC (“Citizens Disability”). The Plaintiff alleges Citizens Disability placed prerecorded telephone calls through a platform to individuals who did not give their prior express written consent. Citizens Disability denies any wrongdoing.

You are a Settlement Class member if you are a person in the United States who (1) answered one or more prerecorded calls from Citizens Disability, (2) made from the Pipes.ai calling platform, (3) between November 8, 2019, and October 25, 2023, and (4) at the time of a call, Citizens Disability’s only lead source for the person called was GrantsAssistanceForYou.Com.

If you are a Settlement Class member, you may submit a timely and valid Claim Form to receive a pro rata (a legal term meaning equal share) cash payment.

**This Notice may affect your rights. Please read it carefully.**

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT</b>		<b>DEADLINE</b>
<b>SUBMIT A CLAIM FORM</b>	The only way to get a cash payment is to submit a timely and valid Claim Form.	Submitted or Postmarked by <b>MAY 22, 2025</b>
<b>EXCLUDE YOURSELF</b>	Get no Settlement benefits. Keep your right to file your own lawsuit against Defendant about the legal claims in this case.	Postmarked by <b>MARCH 17, 2025</b>
<b>OBJECT TO THE SETTLEMENT</b>	Stay in the Settlement, but tell the Court why you do not agree with the Settlement. You will still be bound by the Settlement if the Court approves it.	Filed by <b>MARCH 17, 2025</b>
<b>DO NOTHING</b>	Get no Settlement benefits. Be bound by the Settlement.	

These rights and options –and the deadlines to exercise them—are explained in this Notice.

The Court in charge of this lawsuit must decide whether to approve the Settlement and the requested attorneys’ fees and expenses. No cash payments will be provided to Settlement Class members unless the Court approves the Settlement and it becomes final.

## BASIC INFORMATION

### 1. Why is this Notice being provided?

The Court authorized this Notice because you have the right to know about the Settlement of this class action lawsuit and about all of your rights and options before the Court decides whether to grant final approval to the Settlement. Chief Judge K. Michael Moore of the United States District Court for the Southern District of Florida is presiding over this lawsuit. The lawsuit is called *Shutler v. Citizens Disability LLC*, Civil Action No. 2:23-cv-14337-KMM-RMM.

### 2. What is this lawsuit about?

This lawsuit alleges that Plaintiff Michael Shutler, and other persons nationwide, answered one or more prerecorded telephone calls where Citizens Disability's only lead source for the person called was GrantsAssistanceForYou.com. The lawsuit alleges that Citizens Disability violated the federal Telephone Consumer Protection Act, 47 U.S.C. § 227 ("TCPA"), because that law prohibits placing prerecorded calls to people without their prior express written consent.

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

In a class action, a person called the "Class Representative," (in this case, Michael Shutler), sues on behalf of a group (or groups) of people who have similar legal claims. The people collectively are called a "Settlement Class," and each person is called a "Settlement Class member." The individual who sues—and all of the Settlement Class members—are called the "Plaintiffs." The entity or company they sue, (in this case, Citizens Disability), is called the "Defendant." In a class action lawsuit like this one, the Court resolves the issues and legal claims in the lawsuit for all Settlement Class Members, **except** for those who exclude themselves from the Settlement Class.

Additional information about the Court's reasons for allowing this lawsuit to proceed as a class action is available in the Court's Memorandum Opinion and Order, dated September 9, 2024, which is available at [www.CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com) in the Court Documents section.

## THE LEGAL CLAIMS IN THE LAWSUIT

### 4. What are the Plaintiff's legal claims in this lawsuit?

The legal claims that are made by the Plaintiff in this lawsuit are described above in the answer to Question 2. For additional information, you may read a copy of Plaintiff's Class Action Complaint, available at [www.CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com).

### 5. What does Citizens Disability say about the Plaintiff's legal claims?

Citizens Disability denies that it did anything wrong or violated any law. Specifically, it claims that it did not make the calls. It also claims that if it did make any of the calls, it had prior express written consent to call each person. You can read a copy of Citizen Disability's Answer to Plaintiff's Class Action Complaint, which is available at [www.CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com).

### 6. Did the Court decide who is right?

The Court has not decided whether the Plaintiff or Citizens Disability is correct. Instead, the Plaintiff and Defendant have agreed to a settlement to avoid the risk, cost, and time of continuing the lawsuit.

### **7. Why is there a Settlement?**

The Plaintiff and Defendant do not agree about the legal claims made in this lawsuit. The lawsuit has not gone to trial, and the Court has not decided in favor of the Plaintiff or Defendant. Instead, Plaintiff and Defendant have agreed to settle the lawsuit. The Plaintiff, Defendant, and their lawyers believe the Settlement is best for all Settlement Class members because of the benefits available to Settlement Class members and the risk and uncertainty associated with continuing the lawsuit.

## **WHO IS INCLUDED IN THE SETTLEMENT CLASS**

### **8. Am I part of the Settlement Class?**

The Settlement Class includes:

All people in the United States (1) who answered one or more prerecorded calls from Citizens, (2) made from the Pipes.ai calling platform, (3) between November 8, 2019 to October 25, 2023, (4) and at the time of the call Citizens' only lead source for the person called was GrantsAssistanceForYou.com.

People with a telephone number that appeared in Citizens Disability's call records are potential Settlement Class members and will be notified of this Settlement.

If you did not receive a notice by email or mail regarding the Settlement, you may be part of the Settlement Class if your telephone number appears in Citizens Disability's records. You may be able to obtain your telephone bill and/or records from your telephone carrier, but you do not need to submit that information at this time. If you have any questions about how to obtain this information, or if you are still not sure if you are included in the Settlement Class, you may visit [www.CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com) or call the Class Action Administrator at 1-888-884-7716. You may also receive free help by calling Class Counsel, the lawyers in this lawsuit at the telephone number listed in the answer to Question 28 below.

### **9. Are there exceptions to being included in the Settlement?**

Yes. Excluded from the Settlement Class are Defendant, including any of their parents, subsidiaries, affiliates or controlled persons, as well as their officers, directors, agents, servants, and employees, and the immediate family members of such persons and the judges and staff of the United States District Court for The Southern District of Florida.

## **SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY**

### **10. What does the Settlement provide?**

As a result of the Settlement, Citizens Disability has agreed to create a Settlement Fund of \$320,000.

If you are a Settlement Class member and you submit a timely and valid Claim Form, you may be eligible to receive a pro rata (a legal term meaning equal share) cash payment of the Settlement Fund

after the following items are deducted from the Settlement Fund: attorneys' fees and expenses awarded by the Court, and costs and expenses associated with class notice and administration of the Settlement.

The actual amount paid to each Settlement Class Member who submits a timely and valid Claim Form will not be determined until after the Claim Form filing deadline has passed. The actual amount each participating member of the Settlement Class will receive may be more or less depending on the number of Settlements Class Members who submit timely, valid claims. Cash payments will not be provided to Settlement Class Members unless and until the Court approves the Settlement and it becomes final.

#### **11. What am I giving up by staying in the Settlement Class to receive a cash payment?**

Unless you exclude yourself (opt out), you will remain in the Settlement Class. If the Settlement is approved and becomes final, all Court orders and any judgments will apply to you and legally bind you. You will not be able to sue, continue to sue, or be part of any other lawsuit against the Released Parties about the legal issues in this lawsuit that are released by this Settlement. The specific rights you are giving up are called "Released Claims."

#### **12. What are the Released Claims?**

Section 17 of the Settlement Agreement describes the Releases, Released Claims, and Released Parties, in necessary legal terminology, so please read those sections carefully. The Settlement Agreement is available at [www.CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com). For questions regarding the Releases or Released Claims and what the language in the Settlement Agreement means, you can also contact Class Counsel listed in Question 23 for free, or you can talk to your own lawyer at your own expense.

### **HOW TO GET BENEFITS FROM THE SETTLEMENT**

#### **13. How do I make a claim for a cash payment?**

You must submit a timely and valid Claim Form for a cash payment described in Question 10. Your Claim Form must be submitted online at [www.CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com) by **MAY 22, 2025**, or mailed to the Class Action Administrator at the address on the Claim Form, **postmarked** by **MAY 22, 2025**. Claim Forms are also available by calling 1-888-884-7716 or by writing to:

*Shutler v. Citizens Disability, LLC*  
Class Action Administrator  
P.O. Box 2850  
Portland, OR 97208-2850

#### **14. What happens if my contact information changes after I submit a Claim Form?**

If you change your mailing address or email address after you submit a Claim Form, it is your responsibility to inform the Class Action Administrator of your updated information. You may notify the Class Action Administrator of any changes by writing to:

*Shutler v. Citizens Disability, LLC*  
Class Action Administrator  
P.O. Box 2850  
Portland, OR 97208-2850

**15. When will I receive my cash payment?**

If you file a timely and valid Claim Form, cash payments will be provided by the Class Action Administrator after the Settlement is approved by the Court and becomes final.

It may take time for the Settlement to be approved and become final. Please be patient and check [www. CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com) for updates. The Settlement Website is your best source of up to date information.

**YOUR RIGHTS AND OPTIONS**

You have a choice to make now about whether to stay in the Settlement Class or ask to be excluded from the Settlement Class.

**16. What happens if I do nothing?**

If you are a Settlement Class member, by doing nothing you will remain in the Settlement Class and you will not receive a cash payment. If you are a Settlement Class member and you do nothing, you will not be able to file your own lawsuit, or continue to separately sue, Citizens Disability—as part of any other lawsuit—about the same legal claims that are the subject of this lawsuit. This means that if you do nothing, you may not be able to sue Citizens Disability for the TCPA violations related to the prerecorded calls you may have answered between November 8, 2019, and October 25, 2023. You will also be legally bound by all Orders the Court issues and judgments the Court may make in this lawsuit.

**17. Why would I ask to be excluded?**

If you already have filed, or want to file, your own lawsuit against Citizens Disability for the same types of prerecorded calls it made during the same time period, and want to continue pursuing your individual lawsuit, you need to ask to be excluded from the Settlement Class. If you exclude yourself from the Settlement Class—sometimes referred to as “opting-out” of the Settlement Class—you will not get any money or benefits from this lawsuit. However, you will be able to continue to pursue your own lawsuit, or separately file your own lawsuit, against Citizens Disability for the calls that are at issue in this lawsuit. If you exclude yourself from the Settlement Class, you will not be legally bound by the Court’s judgments in this lawsuit. If you start your own lawsuit against Citizens Disability after excluding yourself from the Settlement Class, you will need to hire and pay your own lawyer for your lawsuit, and you will need to prove your individual legal claim(s).

### **18. How do I ask to be excluded from the Settlement Class?**

To exclude yourself from the Settlement Class, you must mail a written request for exclusion stating that you want to be excluded from *Shutler v. Citizens Disability, LLC*, Case No. 2:23-cv-14337-KMM-RMM.

Your request for exclusion must include:

- 1) your name and address,
- 2) the telephone number that answered the prerecorded calls at issue in this lawsuit, and
- 3) your personal physical signature.

Your exclusion request must be **mailed** to the Class Action Administrator at the following address **postmarked** by **MARCH 17, 2025**:

*Shutler v. Citizens Disability, LLC*  
EXCLUSIONS  
Class Action Administrator  
P.O. Box 2850  
Portland, OR 97208-2850

**You cannot opt out (exclude yourself) by telephone or by email.**

“Mass” or “class” requests for exclusion filed by third parties on behalf of a “mass” or “class” of Settlement Class members or multiple Settlement Class members where the request for exclusion hasn’t been signed by each and every individual Settlement Class Member will not be allowed.

### **19. If I exclude myself from the Settlement Class, can I get anything from the Settlement?**

No. If you exclude yourself, you will not be able to receive a cash payment, but you will not be bound by the Settlement or any judgment in this lawsuit. You can only get a cash payment if you stay in the Settlement and submit a timely and valid Claim Form.

### **20. If I do not exclude myself from the Settlement Class, can I sue Citizens Disability for the same thing later?**

No. Unless you exclude yourself, you give up any right to sue any of the Released Parties for the legal claims this Settlement resolves and Releases relating to the lawsuit. You exclude yourself from this lawsuit to start or continue with your own lawsuit or be part of any other lawsuit against the Released Parties regarding the legal claims in this lawsuit. If you have a pending lawsuit, speak to your lawyer in that case immediately.

## **OBJECTING TO THE SETTLEMENT**

### **21. How do I tell the Court that I do not like the Settlement?**

If you are a Settlement Class member, you can tell the Court you do not agree with all or any part of the Settlement.

To object, you must file timely written notice with the Court as provided below no later than **MARCH 17, 2025**, with copies sent to Class Counsel and Defendant’s Counsel postmarked by **MARCH 17, 2025**, stating you object to the Settlement in *Shutler v. Citizens Disability, LLC*, Case No. 2:23-cv-14337-KMM-RMM.

To file an objection, you cannot exclude yourself from the Settlement Class. Your objection must include all of the following information:

- 1) Your full name, address, telephone number(s), and email address (if any);
- 2) The specific grounds for the objection, accompanied by any legal support for the objection known to you as the objector or your own lawyer;
- 3) The number of times you have objected to a class action settlement within the five (5) years preceding the date that you file the objection, the caption of each case in which you have made such objection, and a copy of any orders related to or ruling upon your prior objections that were issued by the trial and appellate courts in each listed case;
- 4) The identity of any lawyers representing you in connection with the objection (if any);
- 5) The number of times in which your lawyer or your lawyer's law firm have objected to a class action settlement within the five (5) years preceding the date of the filed objection, the caption of each case in which your lawyer or the firm has made such objection and a copy of any orders related to or ruling upon your lawyer's or the lawyer's law firm's prior objections that were issued by the trial and appellate courts in each listed case in which your lawyer's counsel and/or lawyer's law firm have objected to a class action settlement within the preceding (5) years;
- 6) A list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any); and
- 7) Your signature as the objector (an attorney's signature is not sufficient).

To be timely, written notice of an objection including all of the information above must be filed with the Court by **MARCH 17, 2025**.

<b>COURT</b>	<b>CLASS COUNSEL</b>	<b>DEFENDANT'S COUNSEL</b>
U.S. District Court for the Southern District of Florida Wilkie D. Ferguson, Jr. U.S. Courthouse Attn: Judge K. Michael Moore <i>Re: Objection in Shutler v. Citizens Disability LLC</i> 400 North Miami Avenue Miami, FL 33128	The HQ Firm, P.C. Attn: Brittany Clark, Esq. 299 S. Main St. #1300 Salt Lake City, UT 84111	Troutman Amin LLC Attn: Jenniffer Cabrera, Esq. 1825 NW Corporate Blvd - Suite 100 Boca Raton, Florida 33431

If you fail to comply with the requirements for objecting as detailed above, you will waive and forfeit any rights you may have to appear separately and/or to object to the Settlement, and you will be bound by all the terms of the Settlement and by all proceedings, orders, and judgments entered in the lawsuit.

**22. What is the difference between objecting and asking to be excluded (or opting out)?**

Objecting is simply telling the Court you do not like something about the Settlement or the requested attorneys' fees and costs. You can object only if you stay in the Settlement Class (meaning you do not opt out of the Settlement). Opting out of the Settlement, also known as asking to be excluded from the Settlement, is telling the Court you do not want to be part of the Settlement Class or the Settlement. If you opt out, you cannot also object to the Settlement.

## THE LAWYERS REPRESENTING YOU

### 23. Do I have a lawyer in this lawsuit?

The Court has appointed a team of lawyers from the law firm The HQ Firm, P.C. to represent you and the Settlement Class for this Settlement. They are called “Class Counsel.” They are experienced in handling similar class action lawsuits and legal claims.

### 24. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf in this lawsuit, and the Court appointed Class Counsel to do so. If you want someone else to represent you in the lawsuit, you may hire your own lawyer at your own expense.

### 25. How will Class Counsel be paid?

You will not personally pay Class Counsel. Class Counsel will file a motion asking the Court to award attorneys’ fees in an amount equal to 30% of the Settlement Fund before any other deduction and costs of up to \$106,000 of the Settlement Fund. If this is awarded by the Court, the attorneys’ fees and costs will be paid from the Settlement Fund. The Court may also award less than the amounts Class Counsel asks for.

Class Counsel’s application for the attorneys’ fees and costs will be made available on the Settlement Website at [www. CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com).

## THE FINAL APPROVAL HEARING

### 26. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing on **JUNE 3, 2025, at 11:00 a.m. EST** before the Honorable K. Michael Moore at the United States District Court for the Southern District of Florida, Wilkie D. Ferguson, Jr. United States Courthouse, 400 North Miami Avenue, Miami, Florida 33128. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate, and will decide whether to approve the Settlement and Class Counsel’s application for the attorneys’ fees and costs.

**Note:** The date and time of the Final Approval Hearing are subject to change without further notice to the Settlement Class. The Court may also decide to hold the hearing via video conference or by telephone. You should check the Settlement Website [www. CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com) for updates and to confirm the date, time, and format of the Final Approval Hearing has not changed.

### 27. Do I need to attend the Final Approval Hearing?

You do not need to attend the Final Approval Hearing. Class Counsel will represent you there and will answer any questions the Court may have. You are welcome to attend at your own expense.



## GETTING MORE INFORMATION

### 28. Where can I get more information?

This Notice summarizes the proposed Settlement. Complete details about the Settlement are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at [www.CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com). The Settlement Website will be updated with the most current information about the lawsuit as it becomes available.

You may get additional information by visiting [www.CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com), calling toll-free at 1-888-884-7716, or by writing to:

*Shutler v. Citizens Disability, LLC*  
Class Action Administrator  
P.O. Box 2850  
Portland, OR 97208-2850

You may also call Class Counsel at 1-866-710-2484 if you have further questions.

**PLEASE DO NOT CALL THE COURT REGARDING THIS NOTICE**