

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

*Guidotti v. Legal Helpers Debt Resolution, LLC, Global Client Solutions, LLC,  
Rocky Mountain Bank and Trust, et al.* Case No. 11-CV-01219 (D.N.J.)

**If, as a New Jersey resident, you received debt resolution services and also maintained a special purpose or dedicated bank account, a class action settlement may affect your rights.**

*A federal court authorized this notice. You are not being sued. This is not a solicitation from a lawyer.*

- A settlement has been reached between Plaintiff Dawn Guidotti (“Plaintiff”) and two Defendants, Global Client Solutions, LLC (“Global”) and Rocky Mountain Bank & Trust (“RMBT”), in a class action lawsuit claiming that Legal Helpers Debt Resolution, LLC, Eclipse Servicing, Inc., Global, Legal Services Support Group, LLC, JG Debt Solutions, LLC, RMBT, Lynch Financial Solutions, Inc., Jem Group, Inc., Century Mitigations, LP, Legal Helpers PC, Thomas G. Macey, Jeffrey J. Aleman, Jason E. Searns, Jeffrey Hyslip, Thomas M. Nicely, Joel Gavalas, Amber N. Duncan, Harry Hedaya, Douglas L. McClure, Michael Hendrix, and Stephen Chaya (collectively, “Defendants”) violated New Jersey state law. The lawsuit claims that Defendants charged illegal fees in connection with the provision of debt resolution services without a license. Global and RMBT deny all allegations of wrongdoing. The settlement doesn’t decide who is right, but rather is a compromise to end the lawsuit and avoid the uncertainties and costs associated with a trial.
- You are included in the class if, while a resident of New Jersey, you received debt resolution services and also opened and used a special purpose or dedicated bank account with Global between March 3, 2005 and October 26, 2016. The settlement class definition is listed below.
- If the Court approves the settlement, settlement class members who submit complete, valid, and timely claims will receive a check in the amount of \$55.00.
- Please read this notice carefully. Your legal rights are affected whether you act, or don’t act.

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>	
<b>SUBMIT A CLAIM FORM</b>	This is the only way to receive a payment.
<b>EXCLUDE YOURSELF</b>	You will receive no payment, but you will retain any rights you currently have to sue Global or RMBT about the issues the settlement covers in this case.
<b>OBJECT</b>	Write to the Court explaining why you don’t like the settlement.
<b>ATTEND A HEARING</b>	Ask to speak in Court about the fairness of the settlement.
<b>DO NOTHING</b>	You will receive no payment under the settlement and give up your rights to sue Global or RMBT about the issues covered by the settlement in this case.

These rights and options—**and the deadlines to exercise them**—are explained in this notice.

**BASIC INFORMATION**

**1. What is this notice and why should I read it?**

A Court authorized this notice (“Class Notice”) to let you know about a proposed settlement with the Global and RMBT. You have legal rights and options that you may act on before the Court decides whether to approve the proposed settlement. This Class Notice explains the lawsuit, the settlement, and your legal rights.

Judge Jerome B. Simandle of the United States District Court for the District of New Jersey is overseeing this class action lawsuit. The case is called *Guidotti v. Legal Helpers Debt Resolution, LLC, et al.*, Case No. 11-CV-01219 (D.N.J.) The person who filed the lawsuit, Dawn Guidotti, is the Plaintiff. The companies and individuals she sued, including Global and RMBT, are called the Defendants.

**2. What is a class action lawsuit?**

A class action is a lawsuit in which one or more plaintiffs—in this case, Dawn Guidotti—sue on behalf of a group of people who have similar claims. Together, this group is called a “Class” and consists of “Class Members.” In a class action, the Court resolves the issues for all class members, except those who exclude themselves from the class.

**THE CLAIMS IN THE LAWSUIT AND THE SETTLEMENT**

**3. What is this lawsuit about?**

This lawsuit claims that Defendants violated New Jersey law, including New Jersey’s Debt Adjustment Act, by rendering debt adjustment services without a license and by charging illegal fees for such services. Global and RMBT deny these allegations, including that either ever engaged in any such services. The Court has not decided whether Global or RMBT did anything wrong. The settlement is a compromise to end the lawsuit and avoid the uncertainties and costs associated with a trial. The settlement is not an admission

QUESTIONS? CALL 1-866-658-0389 OR VISIT [WWW.NEWJERSEYSETTLEMENT.COM](http://WWW.NEWJERSEYSETTLEMENT.COM)

or finding of wrongdoing by Global or RMBT. More information about the lawsuit, including a copy of the Second Amended Class Action Complaint, can be found on the settlement website at [www.NewJerseySettlement.com](http://www.NewJerseySettlement.com).

#### 4. Why is there a Settlement?

The Court has not decided whether the Plaintiff or Global and RMBT should win this case. Instead, Plaintiff and Global and RMBT have agreed to a settlement. That way, they can avoid the uncertainty and expense of a trial. Plaintiff, on behalf of herself and class members (“Class Representative”), and her attorneys (“Class Counsel”) believe that the settlement is in the best interests of the class members.

#### WHO’S INCLUDED IN THE SETTLEMENT?

#### 5. How do I know if I am in the Settlement Class?

Pursuant to the Settlement Agreement and Release (“Settlement”), you are a member of the Settlement Class if your name appears in Global’s records and you opened a special purpose or dedicated account administered by Global between March 3, 2005 and October 26, 2016, which was opened while you were a resident of New Jersey.

#### THE SETTLEMENT BENEFITS

#### 6. What does the Settlement provide?

Global has agreed to pay \$55.00 to each member of the Settlement Class who paid or transferred monies into their Global special purpose or dedicated account or paid fees or costs out of such account and who submits a valid and timely claim, with all requisite information and documentation.

#### HOW TO GET BENEFITS

#### 7. How do I make a claim?

The Claims Deadline is **May 1, 2018**.

The Settlement creates a claims process, pursuant to which the only way to obtain benefits of the Settlement is by submitting a valid Claim Form, postmarked or filed online no later than the Claims Deadline. A Claim Form is enclosed herewith with pre-paid return postage and may be found on the settlement website, [www.NewJerseySettlement.com](http://www.NewJerseySettlement.com). Only one Claim Form per special purpose or dedicated bank account may be submitted.

The Claim Form requires you to provide basic contact information, including your name and current address, as well as one form of additional information. The Claim Form **must** be signed by you, and you **must** include with your completed Claim Form the information and/or documentation requested therein.

Global may object to a claim submitted by a class member who has not, in fact, paid or transferred monies into their Global special purpose or dedicated account or, in fact, paid out of that account any fees and costs. The class member may then submit documentation demonstrating that he/she did pay or transfer monies into the Global special purpose or dedicated account or did pay out of that account any fees and costs. Unless the class member does so, Global’s objection to the claim shall be final and the claim dis-approved.

#### 8. When will I get my payment?

The hearing to consider the fairness of and to approve the Settlement is scheduled for **May 30, 2018 at 10:00am EST** (“Final Fairness Hearing”). If the Court approves the Settlement, eligible members of the Settlement Class whose claims were approved by the Settlement Administrator will receive their check for \$55.00. Unless a party appeals any aspect of the order approving the Settlement, it is expected that all checks will be mailed within 90 days of the date of the order approving the Settlement.

All checks will expire and become void 90 days after they are issued. Any un-cashed checks issued to Settlement Class members, as well as any unclaimed funds remaining after payment of all Approved Claims, all Settlement Administration Expenses, the Fee Award to Class Counsel, and the incentive award to the Class Representative shall be returned to Global.

#### THE LAWYERS REPRESENTING YOU

#### 9. Do I have a lawyer in this case?

The Court has appointed lawyers from the firms Polino and Pinto, P.C. and Carl D. Poplar, P.A. to represent you as “Class Counsel.” Class Counsel can be reached by calling 1-856-727-1777.

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

You don’t 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 for that lawyer. For example, you can ask your lawyer to appear in Court for you if you want someone other than Class Counsel to represent you.

**11. How will the lawyers be paid?**

Class Counsel will ask the Court for attorneys' fees and expenses of up to \$2,000,000 and will also request an award of \$10,000 for the Class Representative (Dawn Guidotti). The amount awarded to Class Counsel, to the extent it does not exceed \$2,000,000, and to the Class Representative, to the extent it does not exceed \$10,000, will be paid by Global. The Court will determine the proper amount of any attorneys' fees and expenses to award Class Counsel and the proper amount of any awards to the Class Representative. The Court may award less than the amounts requested.

**YOUR RIGHTS AND OPTIONS**

**12. What happens if I do nothing at all?**

If you do nothing, you will receive no payment under the Settlement, you will be in the Settlement Class, and if the Court approves the Settlement, you will also be bound by all orders and judgments of the Court. Unless you exclude yourself, you won't be able to start a lawsuit or be part of any other lawsuit against Global or RMBT for the claims or legal issues being resolved by this Settlement.

**13. What happens if I ask to be excluded?**

If you exclude yourself from the Settlement, you will receive no payment under the Settlement. However, you will not be in the Settlement Class. You will keep your right to start your own lawsuit against Global or RMBT. You will not be legally bound by the Court's judgments related to the Settlement Class and Global and RMBT in this class action.

**14. How do I ask to be excluded?**

You can ask to be excluded from the Settlement. To do so, you must send a letter stating that you want to be excluded from the Settlement in *Guidotti v. Legal Helpers Debt Resolution, LLC, et al.*, Case No. 11-CV-01219. Your letter must also include (1) your name and current address, (2) if possible, your special purpose or dedicated bank account number, (3) a statement that you wish to be excluded from the Class, (4) the caption for this case, and (5) your signature. Your exclusion request must be postmarked no later than **March 30, 2018**, and must be mailed to:

Guidotti v. Legal Helpers Debt Resolution  
c/o Settlement Administrator  
P.O. Box 404017  
Louisville, KY 40233-4017

You can't exclude yourself on the phone or by email.

**15. If I don't exclude myself, can I sue Global and RMBT later?**

No. Unless you exclude yourself, you give up any right to sue Global and/or RMBT for the claims being resolved by this Settlement.

**16. If I exclude myself, can I get anything from this Settlement?**

No. If you exclude yourself, do not submit a Claim Form to ask for a payment.

**17. How do I object to the Settlement?**

If you do not exclude yourself from the Settlement Class, 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 deny approval by filing an objection. To object, you must **file** a letter or brief with the Court stating that you object to the Settlement in *Guidotti v. Legal Helpers Debt Resolution, LLC, et al.*, Case No. 11-CV-01219 no later than **March 30, 2018**. Your objection should be sent to the United States District Court for the District of New Jersey at the following address:

Clerk of the United States District Court for the District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets, Room 1050  
Camden, NJ 08101

The objection must be in writing and include the case name *Guidotti v. Legal Helpers Debt Resolution, LLC, et al.*, Case No. 11-CV-01219. Your objection must be personally signed and include the following information: (1) your name and current address, (2) the specific grounds for your objection, (3) all arguments, citations, and evidence supporting your objection, including copies of any documents you intend to rely on, (4) a statement that you are a member of the Settlement Class, (5) if possible, your special purpose or dedicated bank account number, (6) the name and contact information of any and all attorneys representing you, advising, or in any way assisting you in connection with the preparation or submission of your objection or who may profit from the pursuit of your objection, and (7) a statement indicating whether you (or your counsel) intend to appear at the Final Fairness Hearing. If you are represented by a lawyer, he or she must file an appearance or seek *pro hac vice* admission to practice before the Court and must file your objection on CM/ECF.

In addition to filing your objection with the Court, you must send copies of your objection and any supporting documents to both Class Counsel and Global and RMBT's lawyers at the addresses listed below:

Class Counsel	Global and RMBT's Counsel
Joseph M. Pinto Polino and Pinto, P.C. 720 East Main Street, Suite 1C Moorestown, NJ 08057 -and- Carl D. Poplar Carl D. Poplar, P.A. 1010 Kings Hwy, Suite #A Cherry Hill, NJ 08034	Richard W. Epstein Meredith H. Leonard Greenspoon Marder LLP 200 East Broward Blvd., Suite 1800 Ft. Lauderdale, FL 33301

**18. What's the difference between objecting and excluding myself from the Settlement?**

Objecting simply means telling the Court that you don't like something about the Settlement. You can object only if you stay in the Settlement Class. Excluding yourself from the Settlement Class is telling the Court that you don't want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

**THE COURT'S FAIRNESS HEARING**

**19. When and where will the Court hold a hearing on the fairness of the Settlement?**

The Court will hold the final fairness hearing at **May 30, 2018 at 10:00am EST** before the Honorable Jerome B. Simandle in Courtroom 4A of the Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, New Jersey 08101. The purpose of the hearing is for the Court to determine whether the Settlement is fair, reasonable, and adequate, and in the best interests of the Class. At the hearing, the Court will hear any objections and arguments concerning the fairness of the proposed Settlement, including those related to the amount requested by Class Counsel for attorneys' fees and expenses and the incentive award to the Class Representative.

**Note:** The date and time of the fairness hearing are subject to change by Court order. Any changes will be posted at the settlement website, [www.NewJerseySettlement.com](http://www.NewJerseySettlement.com) or through the Court's online docket search at [www.ecf.njd.uscourts.gov](http://www.ecf.njd.uscourts.gov).

**20. Do I have to come to the hearing?**

No. Class Counsel will answer any questions the Court may have. But you are welcome to come to the hearing at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as your written objection was filed or mailed on time and meets the other criteria described in the Settlement, the Court will consider it. You may also pay a lawyer to attend, but you don't have to.

**21. May I speak at the hearing?**

Yes. If you do not exclude yourself from the Settlement Class, you may ask the Court for permission to speak at the hearing concerning any part of the proposed Settlement. If you filed an objection (*see* question 17 above) and intend to appear at the hearing, *you must state your intention to do so in your objection.*

**GETTING MORE INFORMATION**

**22. Where can I get additional information?**

This notice summarizes the proposed Settlement. For the precise terms and conditions of the Settlement, the Settlement Agreement is available at [www.NewJerseySettlement.com](http://www.NewJerseySettlement.com), or you may contact Class Counsel at 1-856-727-1777, or you may find it through the Court's online electronic full case docket search at [www.ecf.njd.uscourts.gov](http://www.ecf.njd.uscourts.gov), or you may visit the office of the Clerk of the United States District Court for the District of New Jersey Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Room 1050, Camden, NJ 08101, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

**PLEASE DO NOT CONTACT THE COURT, THE JUDGE, OR GLOBAL OR RMBT  
WITH QUESTIONS ABOUT THE SETTLEMENT OR CLAIMS PROCESS.**