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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

IN RE: STIIIZY INC., DATA
BREACH SECURITY
LITIGATION

CASE NO. 2:25-cv-00490-GW-SSC

This Document Relates To:
All Cases

**PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR
FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: October 19, 2026
Time: 8:30 a.m.
Courtroom: 9D, 9th Floor
Judge: Hon. George H. Wu

NOTICE OF MOTION AND MOTION

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on October 19, 2026, at 8:30 a.m., or as soon thereafter as counsel may be heard, in Courtroom 9D, 9th Floor of the United States

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT AND MEMORANDUM IN SUPPORT**
Case No. 2:25-cv-00490-GW-SSC

District Court for the Central District of California, First Street U.S. Courthouse, 350 W 1st Street, Los Angeles, California 90012, the Hon. George H. Wu, presiding, Plaintiffs G.E., Donald Hatch, Bradley Anderson, Daniel Martinez, Lorenzo Montoya, and Elizabeth Orozco-Preza (“Plaintiffs”) hereby do and will move the Court for an Order for final approval of the Settlement and certification of the Settlement Class pursuant to Rules 23(e) and 23(b)(3) of the Federal Rules of Civil Procedure (“Rule(s)”).

In so moving, Plaintiffs respectfully request the Court to enter an order: (1) finally approving the Class Action Settlement Agreement (“Settlement Agreement” or “SA”) as fair, reasonable, and adequate under Rule 23(e); (2) finally certifying the Settlement Class under Rule 23(b)(3); (3) granting Plaintiffs’ Motion for Attorneys’ Fees and Costs and Plaintiffs’ Service Awards; and (4) entering Judgment.

This motion is based upon this Notice, the Memorandum of Points and Authorities, the accompanying and previously submitted declarations, the Settlement Agreement previously filed with the Court (ECF No. 54-3), the arguments of counsel at the hearing of this motion, all papers and records on file in this matter, and any other matters the Court may consider.

Date: September 17, 2026

Respectfully Submitted,

/s/ Yana Hart

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I. INTRODUCTION

Plaintiffs move for final approval of the Class Action Settlement Agreement and Release (“Settlement Agreement” or “SA”), ECF No. 54-3,¹ which resolves this litigation on a class-wide basis. The Parties filed the Settlement Agreement and Plaintiffs’ Unopposed Motion for Preliminary Approval (“MPA”) on April 9, 2026. On May 8, 2026, the Court directed questions and proposed revisions to the documents appended to the Settlement Agreement. Plaintiffs then submitted their revisions and clarification in supplemental briefings, and the Court entered the Preliminary Approval Order (“PAO”) on May 28, 2026, conditionally certifying the Settlement Class, appointing Settlement Class Representatives and Settlement Class Counsel, and approving the notice program. ECF No. 73.

This settlement establishes a non-reversionary \$2,950,000 common fund for the benefit of the Settlement Class Members, together with two years of Credit Monitoring and Identity-Protection Services, valued in retail at \$720 per participating Class Member. Claimants may recover (1) reimbursements of documented losses for up to \$7,500 per individual, or (2) receive a pro rata cash payment, currently estimated to be \$47.39 per non-California Class Member and \$94.78 per California Class Member. Declaration of Elena MacFarland of Eisner Advisory Group, LLC in Connection with Final Approval of Settlement (“EAG Decl.”) ¶ 14. This relief, together with the business-practice commitments described below, represents an excellent resolution of this high-risk, complex litigation.

The Parties also worked diligently and cooperatively to deliver the best Notice practicable to the Settlement Class. The Settlement Agreement provides direct notice via email to Class Members for whom Defendant had email addresses and United

¹ Unless otherwise indicated, the defined terms herein shall have the same definition as set forth in the Settlement Agreement.

1 States Postal Service Mail for whom Defendant had physical mailing addresses.
2 These direct notice efforts reached at least 79.09% of the class. SA ¶ 5.3.3; EAG
3 Decl. ¶ 7. To supplement direct notice, EAG also directed a Supplemental Media
4 Notice, which includes digital banner advertisements and distribution of press
5 releases via PR Newswire and Hispanic Newswire. SA ¶ 5.3.6. EAG also created and
6 monitored a toll-free number with a live operator, and a settlement website to
7 disseminate information to Class Members. *Id.* ¶¶ 5.3.2, 5.3.5. Together, this notice
8 program satisfies due process.

9 The Objection and Opt-Out Deadline was August 26, 2026. EAG Decl. ¶¶ 17-
10 18. Class Members submitted 22,101 valid claims by the deadline, representing
11 6.91% of those who received Direct Notice. *Id.* ¶ 13. Only two individuals requested
12 exclusion, and there are zero objections to the Settlement. *Id.* ¶¶ 17-18.

13 In light of this overwhelmingly favorable response, the valuable benefits
14 obtained for Class Members, and elimination of risk and expense of continued
15 litigation, the Settlement is fair, reasonable, and adequate, and in the best interests of
16 the Class. Plaintiffs respectfully request that the Court: (1) grant final approval of the
17 Settlement, finally certifying the Settlement Class; (2) grant Plaintiffs' Motion for
18 Attorneys' Fees and Costs and Plaintiffs' Service Awards; and (3) enter judgment
19 pursuant to the Settlement Agreement.

20 **II. BACKGROUND**

21 Plaintiffs refer to and adopt herein the recitation of the background facts
22 underlying this matter contained in their Memorandum of Points and Authorities in
23 Support of Unopposed Motion for Preliminary Approval of Class Action Settlement
24 (ECF No. 54-1).

25 On January 17, 2025, Plaintiff G.E., proceeding under a pseudonym, filed *G.E.*
26 *v. STIIZY, Inc.* (Case No. 2:25-cv-00490). Two substantially similar cases followed
27 on January 21, 2025, and January 22, 2025. On April 14, 2025, the Court consolidated
28

1 these matters and appointed Interim Co-Lead Counsel. (ECF No. 28) (the “*G.E.*
2 action”). On May 20, 2025, Defendant removed the related case of *Anderson v.*
3 *Stiiizy, Inc.* (Case No. 2:25-cv-04515, previously 25STCV01219) from the Superior
4 Court of Los Angeles (the “*Anderson* action”). (*Anderson* ECF No. 1), which already
5 consolidated four related state-court actions. On July 3, 2025, the Plaintiffs filed their
6 Consolidated Class Action Complaint (“CCAC”), naming plaintiffs from both *G.E.*
7 and *Anderson* actions. ECF No. 34.

8 The Parties subsequently agreed to mediate the dispute and began engaging in
9 arm’s-length settlement negotiations. ECF No. 74-2, Joint Declaration of Class
10 Counsel in Support of Motion for Attorneys’ Fees and Costs, and Plaintiffs’ Service
11 Awards (“Joint Fee Decl.”) ¶ 10. In advance of mediation, Defendant produced
12 written responses and documents to Plaintiffs’ informal discovery requests. Prior to
13 the mediation, Plaintiffs also began securing multiple bids from competing Claims
14 Administrators to understand the potential costs associated with class notice and
15 related administrative tasks in the event of settlement. *Id.* ¶ 11.

16 On November 21, 2025, the Parties participated in a full-day mediation with
17 Jill R. Sperber, Esq. of Judicate West. ECF No. 74-2 ¶ 12. During mediation, the
18 Parties further learned that Defendant had experienced substantial financial hardship
19 in recent years. After mediation, with Ms. Sperber’s continued oversight, the Parties
20 reached a settlement in principle, subject to review of Defendant’s financial records
21 to confirm representations made during the mediation. Defendant then provided
22 substantial financial records, including audited financial statements confirming
23 constrained financial capacity. The financial condition of Defendant, combined with
24 the risk of non-payment due to Defendant’s financial condition, further reinforced
25 Interim Co-Lead Counsel’s judgment that the Settlement was fair, reasonable, and in
26 the best interest of the Class. After comprehensive negotiations and diligent efforts,
27 including the mediation and subsequent negotiations of Settlement terms, notice
28

1 program and other important material aspects, the Parties finalized the terms and
2 exhibits, and executed the Settlement Agreement on April 1, 2026. *Id.* Following
3 substantial briefing on Plaintiffs' Motion for Preliminary Approval, this Court
4 granted preliminary approval on May 28, 2026 (ECF No. 73).

5 **III. THE SETTLEMENT TERMS**

6 **A. The Settlement Class**

7 Based on Defendant's records, the proposed Settlement Class consists of
8 approximately 404,296 individuals at the time of the Data Security Incident.

9 The **Nationwide Settlement Class** is defined as:

10 All persons whose Private Information was accessed, compromised, or
11 stolen in the Data Security Incident announced by Defendant on January
12 7, 2025.

13 The **California Subclass** is defined as:

14 All persons who were citizens of California when doing business with
15 Defendant, whose Private Information was accessed, compromised, or
16 stolen in the Data Security Incident announced by Defendant on January
17 7, 2025.

18 SA, ¶ 1.8. Excluded from the Class are officers and directors of Defendant,
19 Class Counsel, the Judge presiding over this matter, and any members of the Judge's
20 immediate family and judicial staff. *Id.*

21 The Court granted provisional certification of the Settlement Class for
22 settlement purposes. ECF No. 73, PAO ¶¶ 4, 5. On May 13, 2026, Counsel for
23 Defendant provided EAG with a data file, and after analyzing the file for duplicate
24 and incomplete records, the final Class List was confirmed to contain 404,296
25 Settlement Class Members. EAG Decl. ¶ 4.

26 **B. Settlement Benefits**

27 **1. Monetary Relief**

28 The Settlement provides significant relief to the Class through a non-
reversionary \$2,950,000 common settlement fund. Under the Settlement, all

1 Participating Class Members are eligible to receive (i) for Documented Losses up to
2 \$7,500 per individual, or (ii) a *pro rata* cash payment estimated to be approximately
3 \$47.39 per non-California Claimant and \$94.78 per California Claimant. SA ¶¶ 2.3-
4 2.4; EAG Decl. ¶ 14. Claims for Documented Losses were required to be supported
5 by Reasonable Documentation and such losses had to be reasonably related to the
6 Data Security Incident. SA ¶ 2.3.

7 The amount of each *pro rata* cash payment will depend on the number of
8 Approved Claims and will be equal to each Participating Settlement Class Member's
9 *pro rata* share of remaining Settlement Fund after paying all other expenses and
10 benefits under the Settlement. *Id.* ¶¶ 2.4, 10.3.

11 **2. Credit Monitoring and Identity-Protection Services Benefit**

12 As a further measure of prospective protection, each Class Member had an
13 opportunity to enroll into two years of Credit Monitoring and Identity-Protection
14 Services ("CMIS") with three-bureau credit monitoring. *Id.* ¶ 2.5. The CMIS provides
15 each participating Class Member with various benefits, including credit monitoring
16 and alerts, CyberScan Dark Web monitoring, fully managed identity restoration with
17 access to identity theft specialists, lost wallet assistance, and up to \$1,000,000 in
18 identity theft insurance. *Id.* The CMIS is valued at \$30 per month on the open
19 marketplace, or \$720 for the full 24-month term, for each Participating Class
20 Member.² ECF No. 66, at 3-5. Currently, 9,056 Class Members elected CMIS in
21 addition to their monetary claim. At the market valuation, this represents \$6,520,320
22 in value for the Class.

23
24
25
26
27 ² The costs to the Class for CMIS for 9,056 members are substantially lower,
28 \$90,441.29, which consists of CMIS costs of \$82,590.72 and a vendor setup fee and
sales tax of \$7,850.57.

1 **3. Equitable/Prospective Relief**

2 In addition to monetary relief, Defendant has agreed to, for a period of three
3 years following the Class Settlement, implement certain business practices described
4 in a confidential declaration provided by Defendant to Class Counsel, which will
5 benefit current and future customers of Defendant. SA ¶ 2.6.

6 **4. Release**

7 The release here is narrowly tailored to the Data Security Incident. Upon the
8 effective date, Class Members release only claims “based on, relating to, or arising
9 out of the” incident—the conduct at the core of the consolidated action, and the
10 release expressly excludes bodily injury claims. SA ¶ 1.25. Only the named Plaintiffs
11 agree to the broadest general waiver of unknown claims under Cal. Civ. Code §1542.

12 **5. Class Notice and Claims Administration**

13 The Court appointed EAG as Claims Administrator, with its costs to be paid
14 from the Settlement Fund. ECF No. 73; SA ¶ 5.1. EAG delivered individual notice
15 to the Class by first-class mail and email. EAG Decl. ¶¶ 5-6.

16 After deduplicating files, EAG confirmed the final Class List to contain
17 404,296 Class Members. *Id.* After running the addresses through the USPS’s
18 National Change of Address database, EAG mailed Short Notices to 258,015 Class
19 Members with valid mailing addresses, with 26,527 returned as undeliverable. *Id.*
20 EAG then performed a skip-trace on the returned mail and re-mailed 19,250 Short
21 Notices, with 1,515 of those returned as undeliverable. *Id.* In addition to the direct
22 notice sent via USPS, EAG also sent Short Notice via email to 74,242 Class
23 Members. *Id.* Of those emails attempted for delivery, 3,703 emails were
24 rejected/bounced back as undeliverable. *Id.* EAG believes that the Short Notices
25 reached 319,762 of the 404,296 Class Members for a reach rate of approximately
26 79.09%—significantly more than the Federal Judicial Center Guidelines, which state
27 that a reach rate of 70% is considered a high percentage for a notice campaign. *Id.*

1 Additionally, EAG sent a reminder Email Notice on August 19, 2026, to 68,866 Class
2 Members with a valid email address but who had not yet submitted a claim. *Id.* ¶ 8.

3 EAG established a dedicated Settlement Website,³ which contains information
4 on the Litigation, including a summary of the settlement, important dates and
5 deadlines, contact information for EAG, answers to frequently asked questions,
6 copies of the Settlement and notice documents, Plaintiffs' motion for fees and service
7 awards, and an online Claim Form. *Id.* ¶ 10. EAG also set up a toll-free telephone
8 number that Class Members could call to obtain additional information regarding the
9 settlement through an Interactive Voice Response ("IVR") system and/or through
10 speaking with a live operator. *Id.* ¶ 11. As of September 16, 2026, the IVR system
11 has received 696 calls, and 159 callers have been connected to live operators. *Id.*

12 Finally, EAG implemented a supplemental digital banner notice campaign
13 delivered through the Google Display Network and targeted at potential Settlement
14 Class Members, distributed a press release over PRNewswire's US1 and Hispanic
15 Newslines, and placed the Short Notice in a quarter-page advertisement in the
16 regional print edition of USA Today for four consecutive weeks. *Id.* ¶ 9.

17 **6. Class Members' Favorable Reaction to Class Settlement**

18 The deadline to object or opt-out passed on August 26, 2026, without a single
19 objection; and only two individuals requested exclusion. EAG Decl. ¶¶ 17-18. By the
20 September 10, 2026, Claims Deadline, EAG had received 22,101 valid submissions.
21 *Id.* This equates to a claims rate of approximately 6.91% of those who received Direct
22 Notice, that exceeds the claims rates courts in this Circuit have approved in
23 comparable data breach settlements. *See Carter v. Vivendi Ticketing US LLC*, 2023
24 WL 8153712, at *9 (C.D. Cal., 2023) (approving class action settlement, with a
25 claims rate of 1.6%); *Corona v. Sony Pictures Ent., Inc.*, No. 2:14-cv-9600 (C.D.
26 Cal.) ECF Nos. 145-1 at 11 n.8, 164 at 2 (similar, with a claims rate of 0.7%);
27

28 ³ www.stiiizydatabreachsettlement.com.

1 *Cochran v. Kroger Co.*, No. 5:21-cv-01887, (N.D. Cal.), ECF Nos. 108 at 4-6, 108-
2 1 ¶ 4 (similar, with a claims rate of 2.1%); *Atkinson v. Minted, Inc.*, No. 3:20-cv-
3 03869 (N.D. Cal.), ECF No. 71 at 4 (similar, with a claims rate of 3.5%).

4 Of the 22,101 valid claims received by the deadline, 21,640 requested to
5 receive the Pro Rata Cash Payment, currently estimated at \$47.39 for non-California
6 Class Members and a \$94.78 payment for California subclass members. EAG Decl.
7 ¶ 14. Additionally, 9,056 Class Members elected to receive the CMIS benefit. *Id.* ¶
8 14, Table 3. At CMIS's \$720 retail value per 24-month subscription, that represents
9 \$6,520,320 in additional value delivered to the class. Declaration of Brandon
10 Schwartz, ECF No. 54-12, ¶ 27.

11 **C. Attorneys' Fees and Expenses and Service Awards to Plaintiffs**

12 Settlement Class Counsel have moved the Court for an award of their
13 reasonable attorneys' fees incurred in the Action in an amount not to exceed 25% of
14 the Settlement Fund (\$737,500). Memorandum of Points and Authorities in Support
15 of Plaintiffs' Motion for Attorneys' Fees and Costs, and Plaintiffs' Service Awards
16 ("Fee Motion"), ECF No. 74-1 at 1. Additionally, Settlement Class Counsel seek an
17 order from the Court for reimbursement of a reasonable amount of litigation costs
18 and expenses in the amount of \$31,121.32. *Id.* The total amount requested,
19 \$768,621.32, represents a negative multiplier of approximately 0.97 on Settlement
20 Class Counsel's lodestar as of the filing of the Fee Motion and does not account for
21 all subsequent work by Settlement Class Counsel. *Id.* at 1-2. Finally, Plaintiffs
22 request the Court grant their request for the Service Awards of \$2,500 to each of the
23 Plaintiffs, for a total of \$15,000, in light of their commitment to, and risks taken, in
24 pursuing the Litigation on behalf of the Class. *Id.*, at 1.

1 **IV. LEGAL ARGUMENT**

2 **A. The Court Should Certify the Class for Settlement Purposes**

3 Before assessing the Parties' settlement, the Court should first confirm the
4 underlying Settlement Class meets the requirements of Rule 23. *See Amchem Prods.*
5 *v. Windsor*, 521 U.S. 591, 620 (1997); MANUAL FOR COMPLEX LITIG. § 21.632 (4th
6 ed. 2004). The requirements are well known: numerosity, commonality, typicality,
7 and adequacy—each of which is met here. Fed. R. Civ. P. 23(a); *Ellis v. Costco*
8 *Wholesale Corp.*, 657 F.3d 970, 979–80 (9th Cir. 2011). The Court analyzed at length
9 the requirements under Rule 23(a) and (b) in issuing a preliminary certification. ECF
10 No. 73. All facts bearing upon numerosity, commonality, typicality, adequacy of the
11 class, as well as predominance of common questions and superiority of a class action
12 remain unchanged since Preliminary Approval such that the Court should now certify
13 the Settlement Class for settlement purposes. *See Woodard v. Labrada*, 2023 WL
14 11938015, at *4 (C.D. Cal. Jan. 9, 2023) (reconfirming preliminary approval order
15 certifying settlement classes “for the purpose of final settlement approval”); *Tobin v.*
16 *Ryder Truck Rental, Inc.*, 2021 WL 4945183, at *4 (C.D. Cal., 2021) (finding “all the
17 criteria for class certification remain satisfied, and the Court confirms its order
18 certifying the Settlement Class.”).

19 “Whether to approve a class action settlement is committed to the court’s
20 ‘sound discretion.’” *Woodard*, 2023 WL 11938015, at *2 (quoting *Class Plaintiffs v.*
21 *Seattle*, 955 F.2d 1268, 1276 (9th Cir. 1992)). In assessing whether to grant final
22 approval, the Court analyzes (1) whether the parties have met notice requirements
23 under the Class Action Fairness Act (“CAFA”); (2) whether the notice requirements
24 of Federal Rule of Civil Procedure 23(c)(2)(B) have been satisfied; and (3) whether
25 the proposed settlement is fair, reasonable, and adequate under Rule 23(e)(2). *See*
26 *Ahlman v. Barnes*, 2022 WL 16957837, at *4 (C.D. Cal., 2022).

B. CAFA Notice Requirements are Satisfied

In compliance with CAFA, EAG compiled a notice packet that was mailed on April 17, 2026, and no objections or other responses have been received. EAG Decl. ¶¶ 12, 17-18. This supports final approval. See *Woodard*, 2023 WL 11938015, at *5.

C. Adequate Direct Notice was Effectuated to the Settlement Class

Rule 23(c) requires that the Court directs “the best notice that is practicable under the circumstances, including individual notice to all members who can be identified through reasonable effort.” Fed. R. Civ. P. 23(c)(2)(B); *Eisen v. Carlisle & Jacquelin*, 417 U.S. 156, 173 (1974). Notice must clearly state essential information regarding the settlement, including the nature of the action, terms of the settlement, and class members’ options. See Fed. R. Civ. P. 23(c)(2)(B).

Here, the notice program meets this standard. After providing several clarifying edits to the notice documents, the Court approved the proposed notice program, which EAG implemented thereafter, as described above. See ECF No. 73; EAG Decl. ¶ 4. Direct notice was provided to 319,762 members of the Settlement Class via mail and email. EAG Decl. ¶ 7. Additionally, EAG sent a reminder Email Notice on August 19, 2026, to 68,866 Class Members with a valid email address but who had not yet submitted a claim. *Id.* ¶ 8. EAG implemented the Supplemental Media Notice program described above. EAG represents that through the notice procedures outlined above, 79.09% of the Class Members received direct notice, not taking Supplemental Media Notice into account. *Id.* ¶ 7. See Federal Judicial Center, *Judges’ Class Action Notice and Claims Process Checklist and Plain Language Guide* 3 (2010) (finding 70% to 95% to be reasonable); see also *Schneider v. Chipotle Mexican Grill, Inc.*, 336 F.R.D. 588, 596 (N.D. Cal. 2020) (finding that notice was adequate where it was provided as online ads and notices and reached approximately 72.64% of the settlement class).

D. The Court Should Grant Final Approval of the Settlement

Rule 23(e) provides that a proposed class action may be “settled, voluntarily dismissed, or compromised only with the court’s approval.” Fed. R. Civ. P. 23(e). For a proposed class action to be approved, the Court must determine, after a hearing, that it is fair, adequate, and reasonable. The Ninth Circuit has identified nine factors to consider in analyzing the fairness, reasonableness, and adequacy of a class settlement: (1) the strength of plaintiffs’ case; (2) the risk, expense, complexity, and likely duration of further litigation; (3) the risk of maintaining class action status throughout the trial; (4) the amount offered in settlement; (5) the extent of discovery completed and the stage of the proceedings; (6) the views of counsel; (7) the presence of a governmental participant (not applicable here); (8) the reaction of the class members to the proposed settlement; and (9) whether the settlement is a product of collusion among the parties. *In re Bluetooth Headset Prods. Liab. Litig.*, 654 F.3d 935, 946 (9th Cir. 2011). Each of these factors weighs in favor of approval here.

In applying these factors, the guiding principle for courts remains that settlements of class actions are preferable. *See Franklin v. Kaypro Corp.*, 884 F.2d 1222, 1229 (9th Cir. 1989) (“It hardly seems necessary to point out that there is an overriding public interest in settling and quieting litigation. This is particularly true in class action suits.”). Here, the Court had previously analyzed at length the Rule 23(e) factors, concluding that each was satisfied. ECF No. 73. The relevant factors support the conclusion that the negotiated settlement is fundamentally fair, reasonable, and adequate, and should be finally approved.

1. The Strength of Plaintiffs’ Case

Plaintiffs believe they have a strong case for liability. In particular, Plaintiffs believe ample evidence would have established that Defendant failed to maintain reasonable data security practices, which led directly to the loss of Plaintiffs’ and the Class’s Private Information. Joint Declaration of Proposed Class Counsel in Support

1 of Unopposed Motion for Preliminary Approval of Class Action Settlement (“Joint
2 MPA Decl.”), ECF No. 54-2 ¶ 13. Plaintiffs also believe that if they establish that
3 Defendant’s data security measures were inadequate, Defendant would have been
4 found liable under at least some of the theories of liability pled in the Complaint. *Id.*
5 ¶ 22. However, success is not guaranteed. The actual recovery realized and risks
6 avoided here outweigh the opportunity to pursue potentially more favorable results
7 through full adjudication. *Id.* ¶ 25; *see also Dennis v. Kellogg Co.*, 2013 WL
8 6055326, at *3 (S.D. Cal. Nov. 14, 2013). “Here, as with most class actions, there
9 was risk to both sides in continuing towards trial. The settlement avoids uncertainty
10 for all parties involved.” *Chester v. TJX Companies, Inc.*, 2017 WL 6205788, at *6
11 (C.D. Cal. Dec. 5, 2017). Given the challenges and inherent risks Plaintiffs face with
12 respect to the still evolving claims characteristic of data breach actions, including at
13 class certification, summary judgment, and trial, the substantial benefits of the
14 settlement favor final approval of the Settlement. Joint MPA Decl. ¶ 9.

15 16 **2. The Risk, Expense, Complexity, and Likely Duration of** 17 **Further Litigation**

18 Although Plaintiffs believe their case is strong, substantial risk is inherent in
19 all cases. This case involves a proposed class of approximately 404,296 individuals
20 and a complicated and technical factual background in a relatively novel area: data
21 breach litigation. Although nearly all class actions involve a high level of risk,
22 expense, and complexity—undergirding the strong judicial policy favoring amicable
23 resolutions, *Linney v. Cellular Alaska P’ship*, 151 F.3d 1234, 1238 (9th Cir. 1998)—
24 data breach class actions are particularly risky and complex. *See, e.g., McDaniel v.*
25 *Toshiba Glob. Com. Sols., Inc.*, 2025 WL 3190888, at *6 (C.D. Cal. 2025) (“There
26 are also significant risks associated with class certification, summary judgment, and
27 trial, especially in this data breach case when tying Plaintiff’s alleged injuries to this
28

1 particular data breach may be difficult.”); *In re Anthem Inc. Data Breach Litig.*, 327
2 F.R.D. 299, 315 (N.D. Cal. 2018) (noting that “many of the legal issues presented in
3 [] data-breach case[s] are novel.”).

4 Moreover, the path to a class-wide monetary judgment remains uncertain,
5 particularly in the area of damages. *McDaniel*, 2025 WL 3190888, at *6. The
6 damages methodologies remain largely untested in a disputed class certification
7 setting and in front of a jury. *See Hashemi v. Bosley, Inc.*, 2022 WL 2155117, at *7
8 (C.D. Cal. 2022) (explaining that “data breach class actions are a relatively new type
9 of litigation and that damages methodologies in data breach cases are largely untested
10 and have yet to be presented to a jury”). As in any data breach case, establishing
11 causation on a class-wide basis also remains uncertain.

12 Each risk, by itself, could impede the successful prosecution of these claims at
13 trial and in an eventual appeal—which would result in zero recovery to the Class.
14 Therefore, this factor favors approval. “Regardless of the risk, litigation is always
15 expensive, and both sides would bear those costs if the litigation continued.” *Paz v.*
16 *AG Adriano Goldschmied, Inc.*, 2016 WL 4427439, at *5 (S.D. Cal. 2016).

17 **3. The Risk of Maintaining Class Action Status Through Trial**

18 The Court’s PAO analyzed the requirements of Rule 23, found the
19 requirements satisfied, and conditionally certified the Settlement Class. Nothing has
20 changed that would affect the Court’s ruling on class certification. For the reasons
21 stated in the MPA and the PAO, the Court’s certification of the Settlement Class for
22 settlement purposes only should be affirmed.

23 **4. Amount Offered in Settlement**

24 A settlement should stand or fall on the adequacy of its terms. *In re MRV*
25 *Communs., Inc. Derivative Litig.*, 2013 WL 2897874, at *4 (C.D. Cal., 2013) (citing
26 *In re Corrugated Container Antitrust Litig.*, 643 F.2d 195, 211 (5th Cir. 1981)). The
27 settlement here reflects an excellent result in light of the challenges that come with
28

data breach litigation. Specifically, the settlement provides substantial relief to Class Members who submit valid Claim Forms in the form of CMIS and monetary benefits. See SA ¶¶ 2.3-2.5. The settlement also involves significant business practice enhancements for Defendant's data security system, which will help to protect the Settlement Class's Private Information going forward. *Id.* ¶ 2.6. The \$2,950,000 settlement fund, excluding the non-cash benefit, represents a recovery of approximately \$7.30 per Settlement Class Member,⁴ which is on the higher end of recoveries in data breach class actions, as can be seen from the following chart of representative cases:

Case Title	No. of Class Members	Settlement Fund	Amount Per Class Member
<i>Mendoza v. Crystal Bay Casino</i> , No. 3:23-cv-00092 (D. Nev.)	92,950	\$675,000	\$7.26
<i>In re Kannact, Inc.</i> , No. 6:23-cv-1132 (D. Ore.)	109,210	\$700,000	\$6.40
<i>In re Blackhawk Network Data Breach Litig.</i> , No. 22-cv-07084-CRB (N.D. Cal.)	165,727	\$985,000	\$5.94
<i>Gaston v. FabFitFun, Inc.</i> , No. 2:20-cv-09534-RGK-E, 2021 WL 3362028, at *7–8 (C.D. Cal. Apr. 2, 2021).	441,000	\$625,000	\$1.42

Moreover, the non-cash benefits of 24 months of CMIS made available to every Settlement Class Member, and substantial business practice changes to further protect Plaintiffs' and Class Members' Private Information moving forward,

⁴ Per capita amount is calculated by dividing the total settlement amount by the total number of class members, before deducting litigation costs, administration costs, and attorneys' fees. In this case, it would divide the common fund (\$2,950,000) by the total number of Class members (404,296).

1 represent substantial additional benefits to the Class. Considering that this is an
2 unsettled area of law fraught with the risk that the Class would not be certified and
3 that Plaintiffs would not succeed at trial, the present settlement represents an
4 excellent, as well as a fair, reasonable, and adequate compromise of Plaintiffs' and
5 the Settlement Class Members' claims. Joint MPA Decl. ¶¶ 18-20.

6 The benefits to the class are on par with, if not better than, those offered in the
7 above cases, as all Settlement Class Members are receiving substantial benefits,
8 including reimbursement for: (i) Documented Losses up to \$7,500; (ii) a *Pro Rata*
9 *Cash Payment* estimated to be approximately \$47.39 per non-California Claimant
10 and \$94.78 per California Claimant (based on current claims rate); and (iii) 24 months
11 of CMIS, which includes: (a) up to \$1,000,000 of identity theft insurance coverage;
12 and (b) three-bureau credit monitoring providing notice of changes to the
13 Participating Settlement Class Member's credit profile. SA ¶¶ 2.3-2.5.

14 Because the settlement here is similar to other settlements that courts,
15 including those in this district, have approved, this factor reflects that the settlement
16 is fair. *See Calderon v. Wolf Firm*, 2018 WL 6843723, at *8 (C.D. Cal., 2018)
17 (comparing class settlement with other settlements in similar cases).

18 **5. The Extent of Discovery Completed and the Stage of** 19 **Proceedings**

20 Before entering into settlement discussions on behalf of class members,
21 counsel should have "sufficient information to make an informed decision." *Linney*,
22 151 F.3d at 1239. Here, Plaintiffs gathered all of the information that was available
23 regarding Defendant and the Data Security Incident—including publicly available
24 documents concerning announcements of the Data Security Incident and notice of the
25 Data Security Incident to its customers. Joint Fee Decl. ¶¶ 6-7. Additionally,
26 Defendant provided informal discovery, including detailed data and information
27
28

1 regarding the nature and circumstances of the data breach, how it occurred, the
2 categories of data impacted, the size and composition of the class, as well as other
3 information relevant to Defendant's liability, defenses, and the scope of damages. *Id.*
4 Settlement Class Counsel's experience in similar types of privacy and data protection
5 practices provided substantive knowledge to enable Class Counsel to represent
6 Plaintiffs' and Class Members' interests without expending significant time and
7 money to come up to speed on the subject area. *Id.* ¶ 19. "[T]he efficiency with which
8 the Parties were able to reach an agreement need not prevent this Court from granting
9 . . . approval." *Hillman v. Lexicon Consulting, Inc.*, 2017 WL 10434013, at *4 (C.D.
10 Cal., 2017). Accordingly, Plaintiffs made a decision fully informed about the
11 strengths and weaknesses of this case.

12 **6. The Experience and Views of Counsel**

13 Settlement Class Counsel initiated this lawsuit after Defendant announced the
14 Data Security Incident, which impacted approximately 404,296 individuals.
15 Settlement Class Counsel have substantial experience litigating complex class cases
16 of various types, including data breach cases such as this one. *See* Joint MPA Decl.
17 ¶¶ 29-32. Having worked on behalf of the Class since the Data Security Incident was
18 first announced, evaluated the legal and factual disputes, and dedicated significant
19 time and resources to this litigation, Settlement Class Counsel fully endorse the
20 settlement. *Id.* ¶¶ 13-14. A great deal of weight is accorded to the recommendation
21 of counsel, who are most closely acquainted with the facts of the underlying
22 litigation. *See, e.g., Nat'l Rural Telecomm. Coop. v. DirecTV, Inc.*, 221 F.R.D. 523,
23 528 (C.D. Cal. 2004). Therefore, this factor supports approval.
24
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1 **7. The Reaction of the Class Members to the Proposed**
2 **Settlement**

3 The deadline to object or opt-out was August 26, 2026. In response to 319,762
4 Class Members likely reached, only two individuals have requested exclusion, and
5 zero objections have been filed. EAG Decl. ¶¶ 17-18. “It is established that the
6 absence of a large number of objections to a proposed class action settlement raises
7 a strong presumption that the terms of a proposed class settlement action are
8 favorable to the class members.” *Nat’l Rural Telecomms. Coop.*, 221 F.R.D. at 529;
9 4 NEWBERG ON CLASS ACTIONS, § 11:48 (4th ed. 2002) (“Courts have taken the
10 position that one indication of the fairness of a settlement is the lack of or small
11 number of objections [citations omitted]”).

12 **8. Lack of Collusion among the Parties**

13 The Parties negotiated a substantial, multifaceted settlement, as described
14 above. The Parties did not discuss or negotiate the amount of Attorneys’ Fees and
15 Expenses Award counsel would seek or any Service Awards to Plaintiffs, and there
16 is no agreement by Defendant to not oppose any motion for Fees, Expenses, or
17 Service Awards. SA ¶¶ 9.1-9.2. The Parties negotiated the Settlement Agreement
18 during numerous and periodic arm’s-length negotiations, including a full-day
19 mediation with an experienced and highly qualified mediator, Jill Sperber, Esq., of
20 Judicate West. Joint MPA Decl. ¶¶ 8-9. Furthermore, Settlement Class Counsel are
21 well versed in handling data breach class actions such as this one and fully understand
22 the values recovered in similar cases. *Id.* ¶¶ 20-21. Thus, the Court can be assured
23 that the negotiations were not collusive.

24 **9. The Settlement Treats Settlement Class Members Equitably**

25 Finally, under Rule 23(e)(2)(D), the court must confirm that the settlement
26 treats all class members equitably. Courts should consider “whether the
27 apportionment of relief among class members takes appropriate account of
28

1 differences among their claims, and whether the scope of the release may affect class
2 members in different ways that bear on the apportionment of relief.” Fed. R. Civ. P.
3 23(e), advisory comm.’s note (2018). In deciding whether this factor weighs in favor
4 of approval, a Court must determine whether the Settlement “improperly grant[s]
5 preferential treatment to class representatives or segments of the class.” *Hudson v.*
6 *Libre Tech. Inc.*, 2020 WL 2467060, at *9 (S.D. Cal., 2020) (quoting *In re Tableware*
7 *Antitrust Litig.*, 484 F. Supp. 2d 1078, 1079 (N.D. Cal. 2007)).

8 Here, all Settlement Class Members benefit from the same relief, with the only
9 difference being that California Class Members receive a higher pro rata payment
10 than those outside of California. This is based on the additional statutory claims
11 available only to California Class Members, such as the California Consumer Privacy
12 Act (“CCPA”) or the California Confidentiality of Medical Information Act
13 (“CMIA”), both of which provide statutory damages for those who were subject to a
14 data breach, but are only available to be pled on behalf of the California Subclass.
15 For California residents, the CCPA provides for statutory damages of \$100 to \$750
16 per Class Member, and the CMIA nominal damages of \$1,000 per Class Member.
17 Cal. Civ. Code §§ 56.36(b)(1), 1798.150(a)(1)(A). This treatment is still equitable
18 since it simply recognizes the increased value of California Subclass member claims
19 due to the additional statutory causes of action. *See McDaniel*, 2025 WL 3190888, at
20 *2 (holding that treating California sub-class differently than other states based on
21 their release of statutory claims was appropriate, as was allocating more of the
22 Settlement fund to class members with documented out-of-pocket injuries). Plaintiffs
23 seek Court approval, as explained in detail in Plaintiffs’ Fee Motion, of a service
24 award of \$2,500 to each Plaintiff, which aligns with awards granted in similar cases,
25 is presumptively reasonable, and does not call into question Plaintiffs’ adequacy or
26 the validity of the Settlement. Therefore, this factor also weighs in favor of approval.
27
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1 As such, the relevant factors support the conclusion that the negotiated
2 settlement is fundamentally fair, reasonable, and adequate, and should be finally
3 approved.

4 **E. The Court Should Affirm Its Appointment of Settlement Class**
5 **Counsel and Class Representatives**

6 Under Rule 23, “a court that certifies a class must appoint class counsel . . .
7 [who] must fairly and adequately represent the interest of the class.” Rule
8 23(g)(1)(B). In making this determination, courts generally consider the following
9 factors: (1) proposed class counsel’s work in identifying or investigating potential
10 claims; (2) proposed counsel’s experience in handling class actions or other complex
11 litigation, and the types of claims asserted in the case; (3) proposed class counsel’s
12 knowledge of the applicable law; and (4) proposed counsel’s resources committed to
13 representing the class. Rule 23(g)(1)(A)(i)–(iv); 4 NEWBERG AND RUBENSTEIN ON
14 CLASS ACTIONS § 13:48 (6th ed. 2022).

15 The Court should affirm its appointment of Clarkson Law Firm and Cotchett
16 Pitre & McCarthy as Settlement Class Counsel. Here, Settlement Class Counsel has
17 successfully steered this matter through the hard-fought negotiations and this
18 settlement approval process, and they have proven themselves capable of
19 representing the Class and producing significant results. Moreover, Class Counsel
20 has significant experience in consumer class litigation and especially in privacy
21 litigation. ECF No. 73. Additionally, this Court should affirm its conditional
22 appointment of Plaintiffs as Class Representatives. Plaintiffs have represented the
23 Class admirably and have at all times assisted Settlement Class Counsel in
24 prosecuting this matter as was necessary—as is evidenced by the outcome here. *Id.* ¶
25 7.
26
27
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1 **V. CONCLUSION**

2 For these reasons, Plaintiffs respectfully request this Court grant Plaintiffs'
3 Motion for Final Approval and enter the proposed final judgment and order consistent
4 with the terms of the Settlement in this case.
5

6 Date: September 17, 2026

Respectfully Submitted,

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 11-6.2

The undersigned, counsel of record for Plaintiffs, certifies that this brief contains 5,700 words, which complies with the word limit of L.R. 11-6.1.

By: /s/ Yana Hart
Yana Hart

CERTIFICATE OF SERVICE

I hereby certify that on September 17, 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

By: /s/ Yana Hart
Yana Hart

1
2
3 **THE UNITED STATES DISTRICT COURT**
4 **CENTRAL DISTRICT OF CALIFORNIA**

5 IN RE: STIIIZY INC., DATA
6 BREACH SECURITY LITIGATION,

Master File No.: 2:25-cv-00490-GW-SSC

7 This Document Relates To:
8 *All cases*

**DECLARATION OF ELENA
MACFARLAND OF EISNER
ADVISORY GROUP, LLC IN
CONNECTION WITH FINAL
APPROVAL OF SETTLEMENT**

1 I, Elena MacFarland, hereby declare and state as follows:

2 1. I am a Senior Manager at Eisner Advisory Group, LLC (“EAG” or
3 “EisnerAmper”), the Claims Administrator appointed by the Court in the above-
4 captioned action (the “Action”) pursuant to the Order Granting Preliminary
5 Approval of Class Action Settlement entered May 28, 2026 (ECF 73, ¶ 11) (the
6 “Preliminary Approval Order”). Except as otherwise noted, the matters set forth in
7 this Declaration are based upon my personal knowledge and the information
8 provided by other experienced employees working under my supervision.

9 2. EAG’s duties as Claims Administrator include implementing the
10 Court-approved Notice Plan; establishing and maintaining the Settlement Website
11 and a dedicated toll-free hotline; receiving and tracking requests for exclusion and
12 objections; receiving, reviewing, validating, and adjudicating claims, including
13 fraud detection and de-duplication; corresponding with Class Members; and,
14 following final approval, distributing Settlement benefits.

15 3. This Declaration reports on the status of the notice program and
16 claims administration as of September 16, 2026.

17 **NOTICE PROGRAM AS IMPLEMENTED**

18 4. The Preliminary Approval Order directed that Defendant provide
19 Class Member information to EAG no later than June 2, 2026, and set June 27,
20 2026, as the Notice Date on which EAG was to commence Class Notice (ECF 73,
21 ¶¶ 9, 18). Defendant timely provided EAG with the Direct Notice List, and EAG
22 commenced the Notice Program by the Court-ordered Notice Date. After
23 processing, de-duplication, and address hygiene, the Direct Notice List identified
24 404,296 Class Member records. EAG implemented the Notice Plan described in
25 the *Declaration Regarding Notice Plan and Settlement Administration* filed April
26 9, 2026 (ECF 54-12), consisting of direct email notice, direct mail postcard notice,
27

1 a supplemental digital banner campaign, a press release, publication notice under
2 the California Consumer Legal Remedies Act, a Settlement Website, and a
3 dedicated toll-free hotline.

4 5. **Direct Email Notice.** EAG transmitted the Email Notice to all Class
5 Members for whom a facially valid email address appeared in the Direct Notice
6 List. Before sending the Email Notice, EAG performed an email hygiene and
7 verification process designed to protect the integrity of the email campaign and
8 maximize deliverability. The process included deduplication, syntax validation,
9 misspelled domain detection and correction, domain and risk validation. Email
10 addresses for 74,242 Class Member records passed the hygiene and verification
11 process. As of September 16, 2026, EAG had sent 74,242 Email Notices (18.36%
12 of the Class), of which 70,539 (17.45%) were successfully delivered and 3,703
13 (0.92%) were returned as bounced or otherwise undeliverable. A copy of the Email
14 Notice is attached as **Exhibit A**.

15 6. **Direct Mail Notice.** EAG coordinated and caused the Postcard
16 Notice to be mailed via USPS First Class Mail to all Class Members for whom a
17 mailing address was available, and no valid email address existed, or whose Email
18 Notice was returned as undeliverable. Prior to mailing, all mailing addresses were
19 checked against the National Change of Address (NCOA) database maintained by
20 the United States Postal Service. In addition, the addresses were certified via the
21 Coding Accuracy Support System (CASS) to ensure the quality of the zip code and
22 verified through Delivery Point Validation (DPV) to verify the accuracy of the
23 addresses. As of September 16, 2026, a total of 258,015 Postcard Notices were
24 mailed (63.82% of the Class), of which 26,527 (6.56%) were returned as
25 undeliverable. EAG performed skip tracing on returned mail and re-mailed 19,250
26 Postcard Notices (4.76% of the Class). Of the re-mailed notices, 1,515 (0.37%)
27

Postcard Notices were returned as undeliverable. A copy of the Postcard Notice is attached as **Exhibit B**.

7. Through the Notice procedures outlined above, EAG attempted to send direct notice to 328,554 (81.27%) of Class Members for whom a facially valid email address or mailing address was available in the Direct Notice List. As of September 16, 2026, the direct notice reached a total of 319,762 (79.09%) Class Members¹. Table 1 below provides an overview of dissemination results and reach statistics for direct notice to Class Members.

Table 1: Notice Dissemination Statistics (as of September 16, 2026)		
Description	Volume of Class Members	Percentage of Class Members
Class Members	404,296	100.0%
Email Notice		
Total Email Notices Sent	74,242	18.36%
(-) Total Email Notices Bounced/Undeliverable	3,703	0.92%
(=) Total Email Notices Delivered	70,539	17.45%
Initial Notice Mailing		
Total Notices Mailed	258,015	63.82%
(-) Total Notices Returned as Undeliverable	26,527	6.56%
Supplemental Notice Mailing		
Total Notices Re-Mailed	19,250	4.76%
(-) Total Re-Mailed Notices Returned as Undeliverable	1,515	0.37%
Direct Notice Program Reach		
(+) Received Email Notice	70,539	17.45%
(+) Received Mailed Notice	249,223	61.64%
(=) Received Direct Notice	319,762	79.09%

8. **Direct Reminder Email Notice.** On August 19, 2026, in consultation with Settlement Class Counsel, EAG caused a reminder Email Notice (“Reminder Email Notice”) to be sent to Class Members with a deliverable email address who

¹ A Class Member is considered “reached” by direct notice if a Notice mailed to the Class Member has not been returned by the USPS as undeliverable or, if a Notice mailed to the Class Member was returned by the USPS as undeliverable, a subsequent Notice was mailed to an alternative mailing address for the Class Member and was not returned.

1 had not yet submitted a claim. Ultimately, the Reminder Email Notice was
2 successfully delivered to 68,866 (17.03%) Class Members.

3 **SUPPLEMENTAL MEDIA NOTICE**

4 9. Consistent with the Notice Plan, EAG implemented a supplemental
5 digital banner notice campaign delivered programmatically through the Google
6 Display Network and contextually targeted to adults twenty-one years of age and
7 older who have demonstrated an interest in cannabis dispensaries, with
8 approximately 75% of impressions geotargeted to California and the remaining
9 impressions targeted nationally. In total, 18,319,133 impressions were generated
10 during the campaign, consisting of 13,249,264 California impressions and
11 5,069,869 National impressions. Screenshots of the digital banner are attached as
12 **Exhibit C**. EAG also distributed a press release over PRNewswire's US1 and
13 Hispanic Newslines, which together reach more than 20,000 media outlets in the
14 United States; and, to satisfy the notice requirements of the California Consumer
15 Legal Remedies Act, placed the Short Notice as a quarter-page advertisement in
16 the CA/NV/AZ/NM regional print edition of USA Today once a week for four
17 consecutive weeks. A copy of the press release in English and Spanish as well as
18 the visibility report are attached as **Exhibit D**. A copy of the Short Notice as it
19 appeared in each edition of USA Today is attached as **Exhibit E**.

20 10. **Settlement Website and Toll-Free Hotline.** EAG established and
21 continues to maintain a dedicated Settlement Website
22 (www.stiiizydatabreachsettlement.com). Through the September 10, 2026 Claims
23 Deadline, the Settlement Website permitted Class Members to download the Claim
24 Form (English and Spanish versions were available) for print and mailing, and
25 allowed Class Members to submit Claim Forms electronically. The Settlement
26 Website continues to host the Short Form Notice, Long Form Notice, Exclusion
27

1 Request Form, Settlement Agreement, Consolidated Complaint, preliminary
2 approval papers, Plaintiffs' Motion for Attorneys' Fees, Costs, and Service
3 Awards and the supporting papers as well as a Spanish translation of the Long
4 Form Notice. As of September 16, 2026, the Settlement Website has received
5 2,878,233 page views and 696,244 unique visitors.

6 11. EAG also maintains a dedicated toll-free hotline, which is available
7 twenty-four hours per day, seven days a week. Class Members can call and interact
8 with an interactive voice response ("IVR") system that provides important
9 Settlement information. The toll-free number also offers the ability to speak with
10 a live operator if calling Monday through Friday between the hours of 9:00 a.m.
11 and 6:00 p.m. US Central Time, or to leave a voicemail to address specific
12 questions or requests and receive a call back. As of September 16, 2026, the toll-
13 free hotline has received a total of 696 calls, including 159 live operator calls and
14 89 voicemails.

15 12. **CAFA Notice.** On April 17, 2026, pursuant to 28 U.S.C. §1715,
16 EAG, on behalf of the Defendant, caused notice of this settlement and related
17 materials to be sent to the Attorneys General of applicable states and the Attorney
18 General of the United States. As of September 16, 2026, EAG has not received any
19 objection from any Attorney General. Copy of the CAFA Notice and service list
20 are attached as **Exhibit F**.

21 **CLAIM ACTIVITY**

22 13. The deadline for Class Members to submit a claim was September 10,
23 2026. As of September 16, 2026, EAG has received a total of 330,267 claim
24 submissions, of which 22,101² claims have been determined to be valid,
25

26 ² Include 458 submissions with identified claim deficiencies. Claimants will be provided an
27 opportunity to provide additional information to cure the defect before the claim is approved or
28 deemed invalid.

representing 6.91% of Class Members reached by the Direct Notice. Table 2 below provides summary statistics of claim submissions received. Table 3 below provides a summary of approved claims and estimated awards by category as of September 16, 2026. Class Members who sought reimbursement for Documented Losses and provided insufficient supporting documentation will be issued an Award Letter explaining EAG's determination and providing an opportunity to cure the identified defect. Class Members whose Documented Loss claim is ultimately denied or whose total losses are less than the *pro rata* amount will be awarded the *pro rata* payment amount.

14. If the Court awards Attorneys' Fees, Costs, and Service Awards as requested in the Plaintiffs' Motion for Attorneys' Fees, Costs, and Plaintiffs' Service Awards, filed on August 12, 2026 (ECF No. 74), factoring in the costs of notice and settlement administration, the cost of providing CMIS, and the number of claims approved to date, EAG estimates for the *pro rata* payment to be approximately \$47.39 per non-California Class Member and \$94.78 per California Class Member. The *pro rata* payment may increase or decrease depending on claim deficiencies cured, and as EAG continues to receive and analyze claims.

Table 2: Claims Statistics	
Description	Volume (#)
Total Claims Received	330,267
(-) High Confidence Fraud	291,314
(-) Suspicious Claims	2,536
(-) Duplicate Claims	1,951
(-) Not a Class Member	12,365
(=) Net Valid Claims	22,101

Table 3: Approved Claims Summary	
Category	Value
Class Administrative Costs	\$ 313,741.56
Number of California Subclass Claims	15,527

Number of Non-California Class Member Claims	6,113
Total Number of <i>Pro Rata</i> Cash Payment Claims	21,640
Net Fund [\$2,950,000 - \$737,500 (attorney fees) – \$31,121.32 (litigation costs) - \$15,000 (service awards) - \$313,741.56 (administration costs)]	\$1,852,637.12
Total California Subclass <i>Pro Rata</i> Claims, Estimated at \$94.78 (\$) [2x Base Payment]	\$1,471,649.06
Total Non-California Class <i>Pro Rata</i> Claims, Estimated at \$47.39 (\$) [Available <i>Pro Rata</i> /(NonCA Member Shares + 2x CA Member Shares)]	\$289,695.07
Total <i>Pro Rata</i> Cash for California Recipients [15,527 x \$94.78]	\$1,471,649.06
Total <i>Pro Rata</i> Cash for Non-California Recipients [6,113 x \$47.39]	\$289,695.07
Total <i>Pro Rata</i> Cash Payment Claims (\$)	\$1,761,344.13
Number of Documented Loss Claims	3
Total Documented Losses (\$)	\$845.62
Number of CMIS Claims	9,056
Cost of CMIS per enrollee	\$9.12
Total CMIS Claims Cost to Settlement Fund (\$)	\$90,441.29 ³
Total (\$)	\$1,852,631.04

15. ***Fraud Procedures and Analysis.*** To combat rampant fraud in class action settlements and protect the interests of valid claimants, EAG employs a cutting-edge, three-tiered defense strategy that combines industry-leading technologies with human oversight. EAG’s first line of defense is an advanced machine learning supported Web Application Firewall (“WAF”). This WAF is continuously updated in real time based on insights from the global network, ensuring proactive protection against emerging threats. The second tier of EAG’s defense utilizes sophisticated AI algorithms to detect and mitigate bot and scripted

³ Includes vendor setup fee and sales tax of \$7,850.57.

1 browser traffic, effectively distinguishing between legitimate and malicious
2 activities to prevent attacks like credential stuffing in real time. These algorithms
3 compare data across all active case websites allowing us to identify patterns and
4 bad actors across tens of millions of website interactions. Our third and most
5 comprehensive line of defense involves a team of dedicated fraud prevention
6 specialists who employ a proprietary, multifaceted approach. This includes AI-
7 powered fuzzy matching to identify abnormal patterns indicative of fraud, digital
8 fingerprint verification, and comprehensive monitoring of suspicious IPs and
9 domains across all cases. By leveraging technology, we ensure that our fraud
10 mitigation practices not only meet but exceed industry standards.

11 16. ***High Confidence and Suspicious Fraud Claims.*** Through the
12 procedures outlined above, EAG and its partners identified 293,850 total
13 submissions that display known characteristics of automated claim submissions
14 and other indicators of abuse or contain indicators that suggest the claim is likely
15 fraudulent. High Confidence Fraud claims consist of submissions with indicators
16 that include but are not limited to instances where the same IP address appears up
17 to 3,070 times, claims identified by the AI algorithm as verified bot submissions,
18 and/or the IP is registered to a foreign Internet Service Provider. Suspicious claims
19 consist of submissions that exhibit similar characteristics as High Confidence
20 Fraud claims and that are identified by the AI algorithm as likely bot submissions.
21 Based on my experience and detailed review of claims flagged as Suspicious and
22 High Confidence Fraud, such submissions appear to be invalid and not from Class
23 Members and should be denied.

24 **REQUESTS FOR EXCLUSION AND OBJECTIONS**

25 17. The deadline for Class Members to submit a request to be excluded
26 from the Settlement was on August 26, 2026. As of September 16, 2026, EAG has
27

1 received two (2) requests for exclusion from the Settlement Class. Copies of those
2 requests have been provided to Counsel for the Parties. A list of Class Members
3 who requested exclusion from the Settlement is attached as **Exhibit G**.

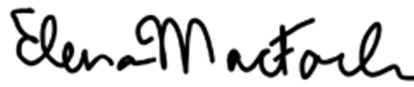
4 18. The deadline for Class Members to object to the Settlement was on
5 August 26, 2026. As of September 16, 2026, EAG has received no objections to
6 the Settlement, to Class Counsel's application for attorneys' fees and expenses, or
7 to the requested Service Awards.

8 **NOTICE AND ADMINISTRATION COSTS**

9 19. As of the date of this Declaration and based on the current number of
10 claims received, EAG has incurred \$263,864.51 in notice and administration fees
11 and costs, and EAG estimates that total notice and administration costs through the
12 completion of the administration will be \$313,741.56.

13 **CERTIFICATION**

14 I, Elena MacFarland, declare under the penalty of perjury that the foregoing
15 is true and correct. Executed on this 17th day of September, 2026, in Baton Rouge,
16 Louisiana.

17 
18

19 Elena MacFarland
20
21
22
23
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EXHIBIT A

Email Notice

Notice of Class Action Settlement – STIIIZY Inc. Data Breach Security Litigation
STIIIZY Data Breach Claims Administrator <notice@pnclassaction.com>
Reply-To: <info@stiiizydatabreachsettlement.com>

Class Member ID: {{ClassMemberID}}

If You Received This Notice, You Have Been Identified as an Individual Whose Personal Information May Have Been Affected by a Data Security Incident Involving STIIIZY Inc.

A court authorized this notice. This is not a solicitation from a lawyer.

This notice is only a summary of the key Settlement terms. A full copy of the Settlement Agreement and Long Form Notice are available on the Settlement Website at www.StiiizyDataBreachSettlement.com or by calling 1-855-907-2590.

What is this lawsuit about? This is a Court-authorized Class Notice of a proposed Settlement in a class action lawsuit, *In Re: STIIIZY Inc. Data Breach Security Litigation*, No. 2:25-cv-00490 (“Action”), pending in the U.S. District Court for the Central District of California. The Settlement will resolve a lawsuit brought on behalf of persons who allege STIIIZY, Inc. (referred to as “STIIIZY” or “Defendant”) committed legal violations in connection with an October 2024 data breach where certain information was stolen from Defendant’s servers (the “Data Security Incident”). STIIIZY denies these allegations, denies violations of any law, and denies all liability.

Who is a Class Member? The Class includes all persons whose personally identifiable information or private health information (collectively “Private Information”) was accessed, compromised, or stolen in the Data Security Incident announced by Defendant on January 7, 2025. There is also a subclass that includes all persons who were residents of California when doing business with Defendant, whose Private Information was accessed, compromised, or stolen in the Data Security Incident announced by Defendant on January 7, 2025.

What are the benefits? **Important: You must submit a claim to receive any monetary benefit or credit monitoring. If you do nothing you will receive nothing – but you will still be bound by this Settlement.**

The Settlement provides the following benefits:

- **Credit Monitoring and Insurance Services:** All Class Members may elect, in addition to the Documented Losses or Pro Rata Cash Fund Payment compensation options, to receive two years of Credit Monitoring, Fraud Consultation, and Identity Theft Restoration Services, which will include (i) up to \$1 million dollars of identity theft insurance coverage and (ii) three-bureau credit monitoring.
- **Pro Rata Cash Fund Payment:** If you do not wish to submit documentation, you may instead elect to receive a Pro Rata Cash Payment by submitting a timely and valid Claim Form. **No documentation is required.**
- **Compensation for Documented Losses:** Class Members may submit a claim for Documented Losses up to seven-thousand and five-hundred dollars (\$7,500) per individual. Defendant will pay valid and timely submitted claims for the following: unreimbursed costs, expenses or charges incurred addressing or remedying identity theft, fraud, or misuse of personal information and/or other issues reasonably traceable to the Data Security Incident upon submission of an approved claim and supporting documentation. If you intend to claim these benefits, you must file your claim online or mail in the claim form available on the settlement website.
- **Business Practice Changes:** Defendant has also agreed to make certain business practice changes that will enhance its cybersecurity system to better protect customer data in the future.

How to file a claim. To receive benefits, you must submit a Claim Form online or by mail. Claim Forms are available at www.StiiizyDataBreachSettlement.com and must be submitted or postmarked **by September 10, 2026. If you do not submit a Claim Form, you will not receive Settlement benefits.**

What are my other options?

Do Nothing: If you do nothing, you remain in the Settlement. You give up your rights to sue but you will not get any compensation as a Class Member. **You must submit a Claim Form if you wish to receive Settlement benefits and will not receive Settlement benefits if you do not do anything.**

Exclude Yourself: You can get out of the Settlement and keep your right to sue about the claims in this Action, but you will not get any compensation from the Settlement. You must submit a Request for Exclusion to the Claims Administrator **by August 26, 2026.**

Object: You can stay in the Settlement but tell the Court why you think the Settlement should not be approved. Your written objection must be submitted **by August 26, 2026.**

Detailed instructions on how to file a Claim Form, exclude yourself, or object can be found on the Settlement Website at www.StiiizyDataBreachSettlement.com.

Attend a hearing: The Court will hold the Final Approval Hearing on **October 19, 2026 at 8:30 a.m. PT**, to consider whether the proposed Settlement is fair, reasonable, and adequate, to consider Plaintiff's Counsel's Fees and Expenses amount for attorneys' fees not to exceed \$737,500 plus reasonable expenses, estimated at \$30,000, and request a Service Award of \$2,500 for each Class Representative (\$15,000 total), and to consider whether and if it should be approved. The date and time of the hearing may change without further notice. Please check the Settlement Website to confirm that date has not changed and for a Zoom link to remotely attend the hearing. You may attend the hearing, with your own attorney, at your own expense, but you do not have to.

This is only a summary. For additional information, including a copy of the Settlement Agreement and other documents, visit the documents section of the Settlement Website or contact class counsel at 1-858-351-3077 or stiiizydb@clarksonlawfirm.com. You may also contact the Claims Administrator to update your address or contact information by visiting the Settlement Website at www.StiiizyDataBreachSettlement.com or call 1-855-907-2590.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

Stiiizy Data Breach Claims Administrator
P.O. Box 1868
Baton Rouge, LA 70821

[Unsubscribe](#) - [Unsubscribe Preferences](#)

EXHIBIT B

Postcard Notice

What is this lawsuit about? This is a Court-authorized notice of a proposed Settlement in a class action lawsuit, *In Re: STIIIZY, Inc. Data Breach Security Litigation*, No. 2:25-cv-00490 (“Action”), pending in the U.S. District Court for the Central District of California. The Settlement will resolve a lawsuit brought on behalf of persons who allege STIIIZY, Inc. violated the law in connection with an October 2024 data breach (the “Data Security Incident”). STIIIZY denies these allegations, denies violations of any law, and denies all liability.

Who is a Class Member? The Class includes all persons whose personally identifiable information or private health information was compromised in the Data Security Incident. There is also a subclass that includes all persons resident in California when doing business with STIIIZY.

What are the benefits? The Settlement provides the following benefits:

- **Pro Rata Cash Fund Payment:** Receive your share of the Settlement Fund. No documentation required. California class members receive twice the payment of other class members. You may also claim CMIS benefit discussed below.
- **Credit Monitoring and Insurance Services (“CMIS”):** All Class Members may elect to receive two years of Credit Monitoring, Fraud Consultation, and Identity Theft Restoration Services, which will include (i) up to \$1 million dollars of identity theft insurance coverage and (ii) three-bureau credit monitoring.
- **Compensation for Documented Losses:** Instead of the pro rata payment, you may claim reimbursement of up to \$7,500 for out of pocket costs reasonably related to the data breach, with supporting documentation. You may choose one cash option (pro rata or compensation for documented losses) but not both. If your Documented Loss claim is denied, you will automatically receive the pro rata. To claim documented loss benefits, you must file your claim online or mail in the claim form available on the settlement website. **Do not submit claims for Documented Losses using this postcard.**
- **Business Practice Changes:** Defendant will enhance its cybersecurity system to better protect customer data in the future.

How to file a claim. You must file a Claim Form online at www.StiiizyDataBreachSettlement.com, or by mail to the Claims Administrator’s address below, postmarked by **September 10, 2026**.

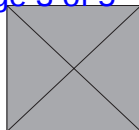
What are my other options? If you do nothing, you get nothing. You give up your rights to sue but you will not get any compensation. If you do not submit a Claim Form, you will not receive Settlement benefits. Exclude Yourself: You can get out of the Settlement and keep your right to sue about the claims in this Action, but you will not get any compensation from the Settlement. You must submit a Request for Exclusion to the Claims Administrator by **August 26, 2026**. **Object:** You can stay in the Settlement but tell the Court why you think the Settlement should not be approved. Your written objection must be submitted by **August 26, 2026**. Detailed instructions on how to object can be found on the Class Notice found on the Settlement Website. The Court will require only substantial compliance with objection requirements. The requirement to object in writing may be excused upon a showing of good cause. **Attend a hearing:** The Court will hold the Final Approval Hearing on **October 19, 2026 at 8:30 a.m. PT**, to consider whether: (1) the proposed Settlement is fair, reasonable, and adequate, (2) whether to approve Plaintiff’s Counsel’s request for Fees and Expenses not to exceed \$737,500 plus expenses estimated at \$30,000, and the request for Service Awards of \$2,500 for each Class Representative. The date and time of the hearing may change without further notice. Please check www.StiiizyDataBreachSettlement.com to confirm the date and for a Zoom link to remotely attend the hearing. You may attend the hearing, with your own attorney, at your own expense, but you do not have to.

This is only a summary. For additional information, including a copy of the Settlement Agreement and other documents, visit the Settlement Website, call the number below, or contact class counsel at 1-858-351-3077 or stiiizydb@clarksonlawfirm.com.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

Stiiizy Data Breach Claims Administrator
P.O. Box 1868
Baton Rouge, LA 70821

#1101



Court Approved Legal Notice



**This is an important notice
about a class action lawsuit.**

ELECTRONIC SERVICE REQUESTED

CLASS MEMBER ID: [Notice ID]
[FIRST NAME] [LAST NAME]
[ADDRESS1]
[ADDRESS2]
[CITY] [STATE] [ZIP]

Claim Form — Class Member ID: [Notice ID]

In Re: STIIZY Inc. Data Breach Security Litigation #1102

Claims must be postmarked or submitted online no later than September 10, 2026.

[FIRST NAME] [LAST NAME]

[ADDRESS1] [ADDRESS2]

[CITY], [STATE] [ZIP]

VISIT THE SETTLEMENT
WEBSITE BY SCANNING
THE PROVIDED QR CODE

QR
Code

All class members can submit a claim form online at www.StiizyDataBreachSettlement.com or the QR Code above. If you are seeking only Credit Monitoring and Insurance Services and/or a Pro Rata Cash Fund Payment, you can complete and mail this Claim Form back to the Claims Administrator. Claims for Documented Losses must be submitted using the claim form available on the settlement website or online.

Credit Monitoring and Insurance Services

1. Would you like to sign up for credit monitoring and insurance services? **Yes** ☐ **No** ☐ (check a box)

Pro Rata Cash Fund Compensation

1. Would you like to choose the *pro rata* cash fund payment? **Yes** ☐ **No** ☐ (check a box)
2. Were you a California resident when doing business with STIIZY? **Yes** ☐ **No** ☐ (check a box)

Select one of the following payment methods: ☐ *PayPal ☐ *Venmo ☐ *Zelle ☐ *Virtual Prepaid Card ☐ Check

* Provide the email or phone number for your PayPal, Venmo, or Zelle account, or an email address for the Virtual Prepaid Card.

Instead of Documented Losses, Class Members may elect to receive a *pro rata* cash fund payment. If you were a California resident when doing business with STIIZY, your *pro rata* cash fund payment will be double. The actual amounts of these payments will be adjusted up or down on a *pro rata* basis.

The Claims Administrator may contact you for additional information. If you fail to respond, or the information that you provide cannot be verified, you may not receive the benefits that you have requested. **By signing my name below, I swear and affirm that the information included on this claim form is true and accurate, and that I am completing this Claim Form to the best of my personal knowledge.**

Signature: _____ Date (mm/dd/yyyy): _____

Return Mailing Address/Updated Contact Information
1103

Class Member ID: [claim Id]

BRM

Stiiizy Data Breach Claims Administrator
P.O. Box 1868
Baton Rouge, LA 70821

EXHIBIT C

Digital Banner

Life | Wellness

DeeperDive BETA Ask USA TODAY anything

How was the algae treated after the pool reopened? → How has religious rhetoric influenced recent Iran war dis



How modern medicine evolved over 250 years

HEALTH AND WELLNESS 9:00 a.m. ET June 26



She came out at as trans at 9 years old. What happened next?

HEALTH AND WELLNESS 10:25 a.m. ET June 26



'Toy Story 5' reignites controversial screen time debate. Why it matters

HEALTH AND WELLNESS 10:06 a.m. ET June 26



At this 'Toy Story 5' viewing, families talked about screens

HEALTH AND WELLNESS 6:03 a.m. ET June 26

Advertisement

PERFECT ONE
FOCUS
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Cleansing...
\$22

available at

Life's final chapter: Making the most of time, money in your senior years

HEALTH AND WELLNESS 5:01 a.m. ET June 26

Asthma is treatable. Know the signs and when to get help

HEALTH AND WELLNESS 5:00 a.m. ET June 26

Supreme Court sides with weedkiller Roundup. MAHA isn't happy

HEALTH AND WELLNESS 4:08 p.m. ET June 25

The surprising invention this teen came up with to help his grandparents

HEALTH AND WELLNESS 9:40 a.m. ET June 25

Advertisement

Did you receive notice from STIIIZY that your personal information may have been affected by a data breach in October 2024, or do you believe you were affected? A class action settlement may entitle you to money.

LEARN MORE

We're always working to improve your experience. Let us know what you think.

[POLITICS](#)[SCIENCE & HEALTH](#)[CULTURE](#)[BUSINESS](#)[NEWSLETTER ▾](#)[✔ REMOVE ADS](#)[📄 BILL TRACKER ▾](#)[ABOUT MARIJUANA MOMENT ▾](#)

DEA Will Highlight Testimony On Marijuana's Medical Benefits In Rescheduling Hearing, New Filing Shows

The Drug Enforcement Administration (DEA) has revealed in a new filing for the cannabis rescheduling hearing set to start on...



POLITICS / 2 hours ago

Marijuana Moment Takes Ask For Rescheduling Hearing Livestreaming Directly To DEA Head After Judge Says He Won't Consider Request



POLITICS / 3 hours ago

Marijuana Opponents Preview Arguments For Next Week's Rescheduling Hearing In New Filings



POLITICS / 19 hours ago

DEA Defends Stance That Synthetic Cannabis Compound HHC Is Federally Banned In Response To Industry Lawsuits



POLITICS / 23 hours ago

Massachusetts Advocates Launch Campaign To Defeat Marijuana Legalization Rollback Ballot Initiative

Did you receive notice from STIIIZY that your personal information may have been affected by a data breach in October 2024, or do you believe you were affected? A class action settlement may entitle you to money.

[LEARN MORE](#)

Advertisement

Did you receive notice from STIIIZY that your personal information may have been affected by a data breach in October 2024, or do you believe you were affected? A class action settlement may entitle you to money.

LEARN MORE

Daily Forecast

San Diego, California · as of 11:48 AM EDT

Day	Conditions	Low	High	Wind
Today	 2% Partly Cloudy	63°	72°	11 mph → W
Sat 27	 6% Cloudy	64°	72°	10 mph → WSW
Sun 28	 12% AM Clouds/PM Sun	63°	69°	11 mph → WSW
Mon 29	 3% Mostly Sunny	63°	69°	10 mph → SW
Tue 30	 5% AM Clouds/PM Sun	63°	69°	11 mph → WSW
Wed 01	 4% AM Clouds/PM Sun	61°	69°	10 mph → W
Thu 02	 5% Mostly Sunny	62°	70°	11 mph → WNW
Fri 03	 5% Partly Cloudy	63°	71°	11 mph → WNW
Sat 04	 5% Mostly Sunny	64°	72°	10 mph → WNW
Sun 05	 5% Partly Cloudy	65°	72°	11 mph → WNW

Advertisement

mintmobile

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\$15 /MO

SHOP NOW

\$45 upfront payment for 3-mo. plan (\$15/mo. equiv.) req'd. Taxes & fees extra. First 3 mos. only. See terms.

Air Quality Index

Moderate

Air quality is acceptable; however, for some pollutants there may be a moderate health concern for a very small number of people who are unusually sensitive to air pollution.

53

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WWE

NBA

Bundesliga

Temas

Calendario de boxeo

Fórmula 1: 2026

Celebridades en el deporte

Ranking libra por libra

Personaliza ESPN

Crear una cuenta

Entrar

Fantasy

Football

Béisbol

Básquetbol

WNBA



La Fábrica de Sueños de ESPN revela el abuso generalizado en las inferiores de Argentina

6h



Fábrica de sueños: el lado cruel del imperio del futbol argentino

Una investigación sobre las inferiores del futbol argentino que produjo a los vigentes campeones del mundo reveló que está plagado de explotación

5h • Steve Fainaru | ESPN.com

México

MÉXICO, RUMBO A LOS 16VOS

MUNDIAL 2026

Ver Todo

TITULARES

Mets despiden al mánager Carlos Mendoza

Posible XI de Argentina-Jordania; Messi, al banco

ESPN: Sistema de desarrollo del futbol argentino, plagado de explotación

Man City ficha a Elliot Anderson por cifra récord

USMNT se estrella contra Turquía; pierde invicto

Mundial: Fechas, sedes, cruces y qué debes saber

Mundial: Mexicana debutó como árbitra central

¿Recibió una notificación de STIIIZY indicando que sus datos personales podrían haberse visto afectados por una violación de datos ocurrida en octubre de 2024 o cree haberse visto afectado? Un acuerdo de demanda colectiva podría darle el derecho a recibir dinero.

APRENDE MÁS

Los videos más vistos

5:27

¿Qué rival le conviene a México en la siguiente ronda del Mundial 2026?

4:16

¿Ecuador es el peor rival posible para México?

Copa Mundial 2026


BOTOX
onabotulinumtoxinA
CHRONIC MIGRAINE



Full Product Information, including Boxed Warning and Medication Guide

Approved Use and Important Safety Information, including Boxed Warning

BOTOX® prevents headaches in adults with chronic migraine, 15 or more headache days a month, each lasting 4 hours or more. It is not approved for adults with migraine



Declaración sobre los peligros de la playa



EL TIEMPO HOY

VIERNES, 26 DE JUNIO

 Intervalos de sol brillante **Máxima: 66°**

 Esta noche: Parcialmente nublado esta noche, seguido de nubes bajas al final del día. **Mínima: 56°**

CLIMA ACTUAL

8:49 AM



57°
F
RealFeel® 58°

Tonalidad RealFeel™	55°
Viento	OSO 7 mph
Ráfagas de viento	14 mph
Calidad del aire	Excelente

Mayormente nublado
[MÁS DETALLES >](#)



¿Recibió una notificación de STIIIZY indicando que sus datos personales podrían haberse visto afectados por una violación de datos ocurrida en octubre de 2024 o cree haberse visto afectado?

Un acuerdo de demanda colectiva podría darle el derecho a recibir dinero.

APRENDE MÁS

MIRANDO HACIA EL FUTURO

Mañana por la tarde hará viento.

ACCUWEATHER AHORA



Noticias principales

NOTICIAS DEL TIEMPO

Aumenta el número de muertos en Venezuela tras dos terremotos consecutivos.

Hace 1 hora



HURACÁN

La formación de una cúpula de calor en la construcción



¿Recibió una notificación de STIIIZY indicando que sus datos personales podrían haberse visto afectados por una violación de datos ocurrida en octubre de 2024 o cree haberse visto afectado? Un acuerdo de demanda colectiva podría darle el derecho a recibir dinero.

APRENDE MÁS

MINUTO A MINUTO: Terremotos en Venezuela Corte Suprema y TPS Acuerdo de EE.UU. con Irán Tabla de goleadores del Mundial Mundial 2026

Las víctimas mortales por los terremotos en Venezuela ascienden a 589



Los equipos de rescate trabajan durante la crítica "ventana de oro" de hasta 72 horas posteriores al sismo

Impacta tu Mundo: Cómo ayudar a los afectados por los terremotos en Venezuela

Los terremotos de Venezuela en mapas y gráficos



ANÁLISIS: La Venezuela de Delcy Rodríguez está tan golpeada que la presidenta no puede rechazar la ayuda ni de amigos ni de enemigos



ANÁLISIS: Es probable que los problemas de corrupción en Venezuela hayan contribuido a la construcción deficiente de los edificios



Tras decisión de la Corte Suprema sobre el TPS, más de un millón de inmigrantes lucharán por permanecer en EE.UU.

La reacción airada de Samuel Alito ante Sonia Sotomayor pone de relieve las tensiones en la Corte



John Bolton se declaró culpable. Aquí por qué el caso no se desmoronó antes de llegar a este punto



EXCLUSIVO CNN: Empresa que trabajó en renovación del estanque reflectante rechazó retomar el proyecto con Trump por "inviabile"



Juez del caso del homicidio de Charlie Kirk declara al fiscal en desacato y mantiene la pena de muerte sobre la mesa



Apagones, racionamiento y prohibición de campamentos de verano: Ucrania ataca Crimea para presionar a Rusia

En Colombia, los venezolanos se organizan contra reloj para hacer llegar ayuda a familiares y amigos

Entre el miedo, la pérdida y la espera angustiante: "Dormimos en el carro"

El Tesoro de EE.UU. levanta temporalmente algunas sanciones a Venezuela para que pueda recibir ayuda por los terremotos

La visita de Trump al Capitolio termina en una discusión a los gritos con el republicano Bill Cassidy

El rey Carlos no vivirá en el Palacio de Buckingham tras costosa reforma

¿Qué les espera a las personas que están en EE.UU. bajo el TPS tras la decisión de la Corte?

Venezuela vivió su noche más negra tras los sismos: "Tuve que tirarme al suelo para clamar a Dios"

EN ESPAÑOL

En Español Deportes Entretenimiento EEUU California Internacional México Más

ANUNCIO

¿Recibió una notificación de STIIZY indicando que sus datos personales podrían haberse visto afectados por una violación de datos ocurrida en octubre de 2024 o cree haberse visto afectado? Un acuerdo de demanda colectiva podría darle el derecho a recibir dinero.

APRENDE MÁS

Titulares de Hoy



La Guaira, Venezuela

LO ÚLTIMO: Ministro de Salud de Venezuela dice que unas 235 personas murieron en sismos



Uruguay pelea por su vida ante España en Guadalajara



Columna: Lumumba Vea, el hombre que une a México, Colombia y el Congo



La última milla, el paraíso de las familias mexicanas

Últimas Noticias



Austria, con ‘peligro por calor’, pone a prueba el duelo Hamilton-Antonelli por el título de F1

La lucha por el título de la Fórmula 1 se está convirtiendo en la batalla definitiva entre juventud y experiencia.



Los dieciseisavos del Mundial toman forma:



La árbitra histórica del Mundial



Carlo Ancelotti toma ritmo mientras Brasil se



La emotiva celebración de Sebastián



EXHIBIT D

Press Release

News in FocusBusiness & MoneyScience & TechLifestyle & HealthPolicy & Public InterestPeople & Culture

Your Personal Information May Have Been Affected by a Data Security Incident Involving STIIIZY Inc.

USA - English

NEWS PROVIDED BY
Stiiizy Claims Administrator →
Jun 26, 2026, 10:00 ET

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LOS ANGELES, June 26, 2026 /PRNewswire/ – The following notice is being issued by the Court approved Claims Administrator and has been authorized by the U.S. District Court for the Central District of California, in *In Re: STIIIZY Inc. Data Breach Security Litigation*, No. 2:25-cv-00490 ("Action").

What is this lawsuit about? This is a Court-authorized Class Notice of a proposed Settlement in a class action lawsuit. The Settlement will resolve a lawsuit brought on behalf of persons who allege STIIIZY, Inc. (referred to as "STIIIZY" or "Defendant") committed legal violations in connection with an October 2024 data breach where certain information was stolen from Defendant's servers (the "Data Security Incident"). STIIIZY denies these allegations, denies violations of any law, and denies all liability.

Who is a Class Member? The Class includes all persons whose personally identifiable information or private health information (collectively "Private Information") was accessed, compromised, or stolen in the Data Security Incident announced by Defendant on January 7, 2025. There is also a subclass that includes all persons who were residents of California when doing business with Defendant, whose Private Information was accessed, compromised, or stolen in the Data Security Incident announced by Defendant on January 7, 2025.

What are the benefits? Important: You must submit a claim to receive any monetary benefit or credit monitoring. If you do nothing you will receive nothing – but you will still be bound by this Settlement.

The Settlement provides the following benefits:

- **Credit Monitoring and Insurance Services:** All Class Members may elect, in addition to the Documented Losses or Pro Rata Cash Fund Payment compensation options, to receive two years of Credit Monitoring, Fraud Consultation, and Identity Theft Restoration Services, which will include (i) up to \$1 million dollars of identity theft insurance coverage and (ii) three-bureau credit monitoring.
- **Pro Rata Cash Fund Payment:** If you do not wish to submit documentation, you may instead elect to receive a Pro Rata Cash Payment by submitting a timely and valid Claim Form. **No documentation is required.**
- **Compensation for Documented Losses:** Class Members may submit a claim for Documented Losses up to seven-thousand and five-hundred dollars (\$7,500) per individual. Defendant will pay valid and timely submitted claims for the following: unreimbursed costs, expenses or charges incurred addressing or remedying identity theft, fraud, or misuse of personal information and/or other issues reasonably traceable to the Data Security Incident upon submission of an approved claim and supporting documentation. If you intend to claim these benefits, you must file your claim online or mail in the claim form available on the settlement website.
- **Business Practice Changes:** Defendant has also agreed to make certain business practice changes that will enhance its cybersecurity system to better protect customer data in the future.

How to file a claim. To receive benefits, you must submit a Claim Form online or by mail. Claim Forms are available at www.StiiizyDataBreachSettlement.com and must be submitted or postmarked by **September 10, 2026. If you do not submit a Claim Form, you will not receive Settlement benefits.**

What are my other options?

Do Nothing: If you do nothing, you remain in the Settlement. You give up your rights to sue but you will not get any compensation as a Class Member. **You must submit a Claim Form if you wish to receive Settlement benefits and will not receive Settlement benefits if you do not do anything.**

Exclude Yourself: You can get out of the Settlement and keep your right to sue about the claims in this Action, but you will not get any compensation from the Settlement. You must submit a Request for Exclusion to the Claims Administrator by August 26, 2026.

Object: You can stay in the Settlement but tell the Court why you think the Settlement should not be approved. Your written objection must be submitted by August 26, 2026.

Detailed instructions on how to file a Claim Form, exclude yourself, or object can be found on the found on the Settlement Website.

Attend a hearing: The Court will hold the Final Approval Hearing on October 19, 2026 at 8:30 a.m. PT, to consider whether the proposed Settlement is fair, reasonable, and adequate, to consider Plaintiff's Counsel's Fees and Expenses amount for attorneys' fees not to exceed \$737,500 plus reasonable expenses, estimated at \$30,000, and request a Service Award of \$2,500 for each Class Representative (\$15,000 total), and to consider whether and if it should be approved. The date and time of the hearing may change without further notice. Please check the Settlement Website to confirm that date has not changed and for a Zoom link to remotely attend the hearing. You may attend the hearing, with your own attorney, at your own expense, but you do not have to.

This is only a summary. For additional information, including a copy of the Settlement Agreement and other documents, visit the documents section of the Settlement Website or contact class counsel at 1-858-351-3077 or stiiizydb@clarksonlawfirm.com. You may also contact the Claims Administrator to update your address or contact information by visiting the Settlement Website or call 1-855-907-2590.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

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LOS ÁNGELES, 26 de junio de 2026 /PRNewswire-HISPANIC PR WIRE/ -- La siguiente notificación es emitida por el administrador de reclamaciones aprobado por el Tribunal y fue autorizada por el Tribunal de Distrito de EE. UU. para el Distrito Central de California, en el caso: *Litigio por violación de la seguridad de los datos de STIIIZY Inc.*, n.º 2:25-cv-00490 (la "Demanda").

¿De qué trata esta demanda? Esta es una notificación colectiva autorizada por el Tribunal sobre un acuerdo propuesto en una demanda colectiva. El acuerdo resolverá una demanda presentada en nombre de personas que alegan que STIIIZY, Inc. (denominado "STIIIZY" o el "Demandado") cometió violaciones a la ley en relación con una violación de datos en octubre de 2024, en la que cierta información fue robada de los servidores del Demandado (el "Incidente de Seguridad de Datos"). STIIIZY niega estas acusaciones, niega haber violado ninguna ley y rechaza toda responsabilidad.

¿Quién es miembro del colectivo? El colectivo incluye a todas las personas cuya información de identificación personal o información privada de salud (colectivamente la "Información Privada") fue accedida, comprometida o robada en el Incidente de Seguridad de Datos anunciado por el Demandado el 7 de enero de 2025. También hay una subclase que incluye a todas las personas que eran residentes de California cuando hacían negocios con el Demandado, y cuya Información Privada fue accedida, comprometida o robada en el Incidente de Seguridad de Datos anunciado por el Demandado el 7 de enero de 2025.

¿Cuáles son los beneficios? Importante: debe presentar una reclamación para recibir algún beneficio monetario o monitoreo de crédito. Si no hace nada, no recibirá nada, pero seguirá estando vinculado por este acuerdo.

El acuerdo proporciona los siguientes beneficios:

- Servicios de monitoreo de crédito y seguros:** todos los miembros del colectivo pueden elegir, además de las opciones de compensación por pérdidas documentadas o pago prorrateado de fondos en efectivo, recibir dos años de servicios de monitoreo de crédito, consulta de fraude y restablecimiento por robo de identidad, que incluirán (i) hasta \$1 millón de dólares de cobertura de seguro contra el robo de identidad y (ii) monitoreo de crédito por parte de tres agencias.
- Pago prorrateado de fondos en efectivo:** si no desea enviar documentación, puede optar por recibir un pago prorrateado en efectivo presentando un formulario de reclamación válido y dentro del plazo establecido. **No se requiere documentación.**
- Compensación por pérdidas documentadas:** los miembros del colectivo pueden presentar una reclamación por pérdidas documentadas de hasta siete mil quinientos dólares (\$7,500) por persona. El Demandado pagará las reclamaciones válidas y presentadas dentro del plazo establecido por los siguientes conceptos: costos, gastos o cargos no reembolsados en los que se haya incurrido para hacer frente o subsanar el robo de identidad, el fraude o el uso indebido de información personal u otros problemas que puedan atribuirse razonablemente al Incidente de Seguridad de Datos, previa presentación de una reclamación aprobada y de la documentación de respaldo. Si tiene la intención de reclamar estos beneficios, debe presentar su reclamación en línea o enviar por correo el formulario de reclamación disponible en el sitio web del acuerdo.
- Cambios en las prácticas comerciales:** el Demandado también acordó realizar ciertos cambios en las prácticas comerciales que mejorarán su sistema de ciberseguridad para proteger mejor los datos de los clientes en el futuro.

Cómo presentar una reclamación. Para recibir los beneficios, debe presentar un formulario de reclamación en línea o por correo. Los formularios de reclamación están disponibles en [www.StiiizyDataBreachSettlement.com](#) y deben presentarse o tener matasellos con fecha, a más tardar, del **10 de septiembre de 2026. Si no presenta un formulario de reclamación, no recibirá beneficios del acuerdo.**

¿Cuáles son mis opciones?

No hacer nada: si no hace nada, permanecerá en el acuerdo. Usted renuncia a sus derechos de demandar, pero no recibirá ninguna compensación como miembro del colectivo. **Debe presentar un formulario de reclamación si desea recibir beneficios del acuerdo; si no hace nada, no los recibirá.**

Excluirse: usted puede salirse del acuerdo y conservar su derecho a interponer una demanda en relación con las reclamaciones en esta Demanda, pero no obtendrá ninguna compensación del acuerdo. Debe presentar una solicitud de exclusión al administrador de reclamaciones a más tardar el 26 de agosto de 2026.

Presentar una objeción: puede permanecer en el acuerdo y, al mismo tiempo, informar al Tribunal por qué considera que no debería aprobarse dicho acuerdo. Su objeción por escrito debe presentarse a más tardar el 26 de agosto de 2026.

Instrucciones detalladas sobre cómo presentar un formulario de reclamación, excluirse o presentar una objeción se pueden encontrar en el sitio web del acuerdo.

Asistir a una audiencia: el Tribunal celebrará la audiencia de aprobación definitiva el 19 de octubre de 2026 a las 8:30 a. m., hora del Pacífico, para determinar si el acuerdo propuesto es justo, razonable y adecuado; para determinar el monto de los honorarios y gastos de abogados del demandante en cuanto a honorarios de los abogados que no excedan los \$737,500 más gastos razonables, estimados en \$30,000, y solicitar una adjudicación por servicio de \$2,500 para cada representante del colectivo (\$15,000 en total), y para determinar si debe aprobarse o no. La fecha y hora de la audiencia pueden cambiar sin previo aviso. Consulte el sitio web del acuerdo para confirmar que la fecha no ha cambiado y para obtener un enlace de Zoom para asistir a la audiencia de forma remota. Puede asistir a la audiencia, acompañado de su propio abogado y por cuenta propia, pero no está obligado a hacerlo.

Este es solo un resumen. Para obtener información adicional, incluida una copia del acuerdo de conciliación y otros documentos, visite la sección de documentos del sitio web del acuerdo o comuníquese con el abogado del colectivo llamando al 1-858-351-3077 o escribiendo a [stiiizydb@clarksonlawfirm.com](#). También puede comunicarse con el administrador de reclamaciones para actualizar su dirección o información de contacto visitando el sitio web del acuerdo o llamando al 1-855-907-2590.

POR FAVOR, NO LLAME POR TELÉFONO AL TRIBUNAL NI A LA SECRETARÍA DEL TRIBUNAL PARA INFORMARSE SOBRE ESTE ACUERDO O SOBRE EL PROCESO DE RECLAMACIONES.

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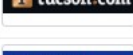
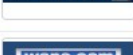
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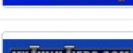
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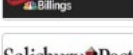
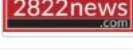
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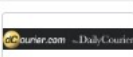
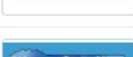
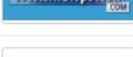
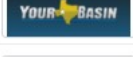
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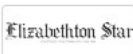
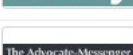
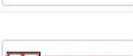
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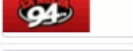
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	Cache Valley Media Group [Logan, UT] ↗	99,068	US	English	Newspaper	Media & Infor...
	KSNF/KODE [Joplin, MO] ↗	98,517	US	English	Broadcast Med...	Media & Infor...

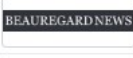
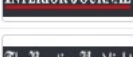
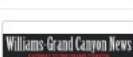
	WEHT/WTWV [Evansville, IN]	↗	98,105	US	English	Broadcast Med...	Media & Infor...
	Missoulian, Missoula, Montana	↗	93,028	US	English	Newspaper	Media & Infor...
	WDHN-TV ABC [Webb, AL]	↗	87,433	US	English	Broadcast Med...	Media & Infor...
	KXMA/KXMB [Bismark, ND]	↗	84,418	US	English	Broadcast Med...	Media & Infor...
	Porterville Recorder, Porterville, California	↗	74,987	US	English	Newspaper	Media & Infor...
	Porterville Recorder, Porterville, California	↗	74,987	US	English	Newspaper	Media & Infor...
	KLST/KSAN [San Angelo, TX]	↗	72,461	US	English	Broadcast Med...	Media & Infor...
	WBGH/WIVT [Binghamton, NY]	↗	68,977	US	English	Broadcast Med...	Media & Infor...
	Santa Maria Times, Santa Maria, California	↗	68,342	US	English	Newspaper	Media & Infor...
	WFFF-TV FOX 44 / WVNY-TV ABC-22 [Colchester, VT]	↗	68,041	US	English	Broadcast Med...	Media & Infor...
	WFXR [Roanoke, VA]	↗	67,972	US	English	Broadcast Med...	Media & Infor...
	KULR-8, Billings, Montana	↗	67,781	US	English	Newspaper	Media & Infor...
	Salisbury Post	↗	67,645	US	English	Newspaper	Media & Infor...
	QuadCities WHBF-TV CBS-4 / KLJB-TV FOX-18 [Rock Island, IL]	↗	67,367	US	English	Broadcast Med...	Media & Infor...
	WNCT [Greenville, NC]	↗	65,012	US	English	Broadcast Med...	Media & Infor...
	KWKT-TV FOX-44 / KYLE-TV MyNetworkTV [Woodway, TX]	↗	64,846	US	English	Broadcast Med...	Media & Infor...
	WTWO-TV NBC-2/WAWV-TV ABC-38 MyWabashValley [Terre Haute IN]	↗	64,115	US	English	Broadcast Med...	Media & Infor...
	Arizona Daily Sun, Flagstaff, Arizona	↗	62,951	US	English	Newspaper	Media & Infor...
	Myhighplains	↗	62,518	US	English	Broadcast Med...	Media & Infor...
	Taos News, Taos, New Mexico	↗	62,349	US	English	Newspaper	Media & Infor...
	KLRT-TV FOX-16 [Little Rock, AR]	↗	61,833	US	English	Broadcast Med...	Media & Infor...
	WBRE/WYOU [Wilkes-Barre, PA]	↗	57,524	US	English	Broadcast Med...	Media & Infor...
	Napa Valley Register, Napa, California	↗	57,325	US	English	Newspaper	Media & Infor...
	Napa Valley Register, Napa, California	↗	57,325	US	English	Newspaper	Media & Infor...
	Valdosta-Daily Times	↗	56,577	US	English	Newspaper	Media & Infor...
	Gillette News Record, Gillette, Wyoming	↗	55,567	US	English	Newspaper	Media & Infor...
	The Union, Grass Valley, California	↗	55,269	US	English	Newspaper	Media & Infor...
	News Miner, Fair	↗	53,028	US	English	Newspaper	Media & Infor...
	News Miner, Fair	↗	53,028	US	English	Newspaper	Media & Infor...

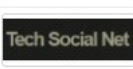
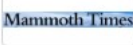
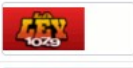
	KGWN-TV CBS-5 [Greeley, CO]	↗	51,928 US	English	Broadcast Med...	Media & Infor...
	American Press ↗		51,591 US	English	Newspaper	Media & Infor...
	KDAF-TV CW-33 [Dallas, TX] ↗		50,429 US	English	Broadcast Med...	Media & Infor...
	The Davis Enterprise, Davis, California ↗		48,802 US	English	Newspaper	Media & Infor...
	Business Chief ↗		48,338 UK	English	Online News S...	Business Serv...
	Ironton Tribune ↗		47,823 US	English	Newspaper	Media & Infor...
	The Daily Courier [Prescott Valley, AZ] ↗		46,618 US	English	Newspaper	Media & Infor...
	TMCnet ↗		45,927 US	English	Trade Publica...	Tech
	The News-Review, Roseburg, Oregon ↗		43,698 US	English	Newspaper	Media & Infor...
	Helena Independent Record, Helena, Montana ↗		41,081 US	English	Newspaper	Media & Infor...
	KREX/KFQX/KGJT [Grand Junction, CO] ↗		40,916 US	English	Broadcast Med...	Media & Infor...
	KARD/KTVE [West Monroe, LA] ↗		40,774 US	English	Broadcast Med...	Media & Infor...
	KMID/KPEJ [Odessa, TX] ↗		40,538 US	English	Broadcast Med...	Media & Infor...
	Elko Daily Free Press, Elko, Nevada ↗		40,522 US	English	Newspaper	Media & Infor...
	Columbia Gorge News, Hood River, Oregon ↗		39,983 US	English	Newspaper	Media & Infor...
	Appeal-Democrat, Marysville/Yuba City, California ↗		39,939 US	English	Newspaper	Media & Infor...
	Appeal-Democrat, Marysville/Yuba City, California ↗		39,939 US	English	Newspaper	Media & Infor...
	The Daily Leader ↗		39,701 US	English	Newspaper	Media & Infor...
	Daily Republic, Fairfield, California ↗		39,359 US	English	Newspaper	Media & Infor...
	Chino Valley Champion, Chino, California ↗		39,114 US	English	Newspaper	Media & Infor...
	NCWLIFE, Wenatchee, Washington ↗		38,268 US	English	Newspaper	Media & Infor...
	Aspen Daily News, Aspen, Colorado ↗		38,022 US	English	Newspaper	Media & Infor...
	Casper Star-Tribune [Casper, WY] ↗		37,783 US	English	Newspaper	Media & Infor...
	Imperial Valley Press, El Centro, California ↗		37,220 US	English	Newspaper	Media & Infor...
	Imperial Valley Press, El Centro, California ↗		37,220 US	English	Newspaper	Media & Infor...
	Capital Press ↗		36,261 US	English	Newspaper	Media & Infor...
	Antelope Valley Press, Palmdale/Lancaster, California ↗		35,693 US	English	Newspaper	Media & Infor...
	Mountain Democrat, Placerville, California ↗		35,335 US	English	Newspaper	Media & Infor...
	Winchester Sun ↗		34,701 US	English	Newspaper	Media & Infor...

PHL17 PHL 17 WPHL [Philadelphia, PA] 34,627 US	English English Broadcast Med... Broadcast Med...	Media & Infor... Media & Infor...	Case 2:25-cv-00490-GW-SSC Document 78-4 Filed 09/17/26 Page 10 of 30 Page ID #:1122		Las Vegas Optic, Las Vegas, New Mexico 33,482 US English Newspaper	
THE SENTINEL THE SENTINEL Hanford Sentinel, Hanford, California 32,536 US	English Newspaper	Media & Infor... Media & Infor...				
MONTANA STANDARD MONTANA STANDARD Montana Standard, Butte, Montana 32,276 US	English Newspaper	Media & Infor... Media & Infor...				
6 KPVI NEWS THAT WORKS FOR YOU KPVI News 6, Pocatello, Idaho 32,060 US	English Newspaper	Media & Infor... Media & Infor...				
INFORMN NY INFORMN NY WWTI-TV ABC-50 [Watertown, NY] 31,421 US	English Broadcast Med...	Media & Infor... Media & Infor...				
Lodi News-Sentinel, Lodi, California 31,405 US	English Newspaper	Media & Infor... Media & Infor...				
LOMPOC RECORD LOMPOC RECORD Lompoc Record, Lompoc, California 31,216 US	English Newspaper	Media & Infor... Media & Infor...				
Times-News, Twin Falls, Idaho 31,107 US	English Newspaper	Media & Infor... Media & Infor...				
Gazette-Times Gazette-Times Gazette-Times, Corvallis, Oregon 30,100 US	English Newspaper	Media & Infor... Media & Infor...				
Tracy Press Tracy Press Tri-Valley Times, Pleasanton, California 29,809 US	English Newspaper	Media & Infor... Media & Infor...				
THE UNION DEMOCRAT THE UNION DEMOCRAT The Union Democrat, Sonora, California 29,302 US	English Newspaper	Media & Infor... Media & Infor...				
810 NEWS 810 NEWS Big Country News Connection, Spokane, Washington 27,738 US	English Newspaper	Media & Infor... Media & Infor...				
Roswell Daily Record Roswell Daily Record Roswell Daily Record, Roswell, New Mexico 26,464 US	English Newspaper	Media & Infor... Media & Infor...				
SWX LOCAL Sports SWX LOCAL Sports SWX Local Sports, Montana 26,434 US	English Newspaper	Media & Infor... Media & Infor...				
WKBN 27 WKBN 27 WYTV-TV ABC-33 [Youngstown, OH] 25,035 US	English Broadcast Med...	Media & Infor... Media & Infor...				
West Valley View West Valley View West Valley View, Avondale AZ 24,657 US	English Newspaper	Media & Infor... Media & Infor...				
State Journal State Journal The State Journal 24,335 US	English Newspaper	Media & Infor... Media & Infor...				
CAL O NEWS CAL O NEWS Cal OES News, Sacramento, California 22,831 US	English Newspaper	Media & Infor... Media & Infor...				
THE MINER THE MINER Kingman Miner, Kingman AZ 22,691 US	English Newspaper	Media & Infor... Media & Infor...				
THE OXFORD EAGLE THE OXFORD EAGLE The Oxford Eagle 21,955 US	English Newspaper	Media & Infor... Media & Infor...				
The Farmville Herald The Farmville Herald The Farmville Herald 21,919 US	English Newspaper	Media & Infor... Media & Infor...				
UNION-RECORDER UNION-RECORDER Union-Recorder 21,610 US	English Newspaper	Media & Infor... Media & Infor...				
THE PRESS THE PRESS The Press, Brentwood, California 21,129 US	English Newspaper	Media & Infor... Media & Infor...				
DESERT REVIEW DESERT REVIEW The Desert Review, El Centro, California 20,316 US	English Newspaper	Media & Infor... Media & Infor...				
DAILY NEWS DAILY NEWS Mohave Daily News, Bullhead City, AZ 20,073 US	English Newspaper	Media & Infor... Media & Infor...				
Democrat-Herald Democrat-Herald Albany Democrat-Herald, Albany, Oregon 20,054 US	English Newspaper	Media & Infor... Media & Infor...				
TEHACHAPI NEWS TEHACHAPI NEWS Tehachapi News, Tehachapi, California 18,842 US	English Newspaper	Media & Infor... Media & Infor...				
Portal de Financas 18,581 Brazil	English Online News S...	Financial Financial				
Tryon Daily Bulletin Tryon Daily Bulletin The Tryon Daily Bulletin 17,967 US	English Newspaper	Media & Infor... Media & Infor...				

	Prescott Times, Prescott AZ ↗	17,346	US	English	Newspaper	Media & Infor...
	Ravalli Republic, Hamilton, Montana ↗	17,206	US	English	Newspaper	Media & Infor...
	WMI Central.com, Iron Mountain, Michigan ↗	17,087	US	English	Newspaper	Media & Infor...
	Idaho County Free Press, Grangeville, Idaho ↗	16,440	US	English	Newspaper	Media & Infor...
	The Daily Titan, Fullerton, California ↗	16,328	US	English	Newspaper	Media & Infor...
	Hi-Desert Star, Yucca Valley, California ↗	16,238	US	English	Newspaper	Media & Infor...
	Elizabethton Star ↗	16,055	US	English	Newspaper	Media & Infor...
	Gilbert Sun, Gilbert AZ ↗	16,043	US	English	Newspaper	Media & Infor...
	Fairfield Sun Times, Fairfield, Montana ↗	15,702	US	English	Newspaper	Media & Infor...
	Yuma Sun, Yuma AZ ↗	14,449	US	English	Newspaper	Media & Infor...
	Yuma Sun, Yuma AZ ↗	14,449	US	English	Newspaper	Media & Infor...
	Picayune Item ↗	13,874	US	English	Newspaper	Media & Infor...
	Port Arthur News ↗	13,519	US	English	Newspaper	Media & Infor...
	CNYhomepage ↗	13,411	US	English	Broadcast Med...	Media & Infor...
	Pasadena Weekly, Pasadena, California ↗	13,317	US	English	Newspaper	Media & Infor...
	The Advocate-Messenger ↗	13,006	US	English	Newspaper	Media & Infor...
	Los Angeles Downtown News, Los Angeles, California ↗	12,320	US	English	Newspaper	Media & Infor...
	Santa Ynez Valley News, Santa Ynez Valley, California ↗	12,251	US	English	Newspaper	Media & Infor...
	Americus Times-Recorder ↗	10,835	US	English	Newspaper	Media & Infor...
	Record Gazette, Banning, California ↗	10,609	US	English	Newspaper	Media & Infor...
	BocaLista ↗	10,594	Puerto Rico	Spanish	Online News S...	Multicultural...
	Cala Academy ↗	10,489	US	Spanish	Online News S...	Multicultural...
	California Business Journal ↗	10,335	US	English	Online News S...	Tech
	L'Observateur ↗	10,271	US	English	Newspaper	Media & Infor...
	Sunnyside Sun, Sunnyside, Washington ↗	10,016	US	English	Newspaper	Media & Infor...
	Ledger Dispatch, Jackson, California ↗	9,850	US	English	Newspaper	Media & Infor...
	The Post-Searchlight ↗	9,850	US	English	Newspaper	Media & Infor...
	Fontana Herald News, Fontana, California ↗	9,731	US	English	Newspaper	Media & Infor...
	The Daily News ↗	9,668	US	English	Newspaper	Media & Infor...
	Mega TV ↗	9,526	US	Spanish	Broadcast Med...	Multicultural...
	VCR Reporter, Ventura County, California ↗	9,412	US	English	Newspaper	Media & Infor...

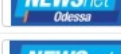
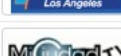
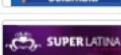
	Taft Midway Driller, Taft, California [link]	8,396	US	English	Newspaper	Media & Infor...
	The Argonaut, Los Angeles, California [link]	8,964	US	English	Newspaper	Media & Infor...
	Exponent, Montana State University, Bozeman, Montana [link]	8,902	US	English	Newspaper	Media & Infor...
	WNTZ [Alexandria, LA] [link]	8,881	US	English	Broadcast Med...	Media & Infor...
	The Panolian [link]	8,429	US	English	Newspaper	Media & Infor...
	Moorpark Acorn, Moorpark, California [link]	8,404	US	English	Newspaper	Media & Infor...
	Chae-Koosta News, Pablo, Montana [link]	8,274	US	English	Newspaper	Media & Infor...
	All Tech Magazine [link]	8,185	Global	English	Magazine	Tech
	CreditRiskMonitor [link]	8,107	US	English	Financial Dat...	Financial
	Davie County Enterprise Record [link]	7,913	US	English	Newspaper	Media & Infor...
	Village Life, El Dorado Hills, California [link]	6,664	US	English	Newspaper	Media & Infor...
	Estes Park News, Estes Park, Colorado [link]	6,593	US	English	Newspaper	Media & Infor...
	Middlesboro News [link]	6,422	US	English	Newspaper	Media & Infor...
	American Chamber of eCommerce [link]	6,370	US	English	Online News S...	Business Serv...
	American Chamber of eCommerce [link]	6,370	US	English	Online News S...	Business Serv...
	NewsBlaze US [link]	6,329	US	English	Online News S...	Media & Infor...
	La Nueva 94 FM [link]	6,253	Puerto Rico	Spanish	Broadcast Med...	Multicultural...
	Orange Leader [link]	6,198	US	English	Newspaper	Media & Infor...
	WLAX-TV FOX 28/45 [La Crosse, WI] [link]	6,182	US	English	Broadcast Med...	Media & Infor...
	UrbanGeekz [link]	6,004	US	English	Online News S...	Tech
	Chandler News, Chandler, AZ [link]	5,991	US	English	Newspaper	Media & Infor...
	The Daily Independent, Ridgecrest, California [link]	5,783	US	English	Newspaper	Media & Infor...
	Sierra County Sentinel-KCHS [Truth or Consequences, NM] [link]	5,616	US	English	Newspaper	Media & Infor...
	Clearwater Tribune, Orofino, Idaho [link]	5,611	US	English	Newspaper	Media & Infor...
	Queen Creek Tribune, Queen Creek AZ [link]	5,593	US	English	Newspaper	Media & Infor...
	Coronado Eagle & Journal, Coronado, California [link]	5,311	US	English	Newspaper	Media & Infor...
	The Brewton Standard [link]	5,059	US	English	Newspaper	Media & Infor...
	Kodiak Daily Mirror, Kodiak, AK [link]	4,824	US	English	Newspaper	Media & Infor...
	Wickenburg Sun [link]	4,746	US	English	Newspaper	Media & Infor...
	Tucson Lifestyle, Tucson, AZ [link]	4,714	US	English	Newspaper	Media & Infor...

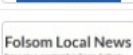
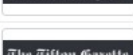
	Redlands Community News, Redlands, California	↗	4,649 US	English	Newspaper	Media & Infor...
	CW7 Arizona [Phoenix, AZ]	↗	4,565 US	English	Broadcast Med...	Media & Infor...
	Buffalo Bulletin, Buffalo, Wyoming	↗	4,336 US	English	Newspaper	Media & Infor...
	Trinity Journal, Weaverville, California	↗	4,258 US	English	Newspaper	Media & Infor...
	The Charlotte Gazette	↗	4,145 US	English	Newspaper	Media & Infor...
	Chewelah Independent, Chewelah, Washington	↗	4,125 US	English	Newspaper	Media & Infor...
	St. Claire News-Aegis	↗	3,965 US	English	Newspaper	Media & Infor...
	IT Tech Pulse by Demand Media BPM	↗	3,837 US	English	Online News S...	Tech
	Rio Grande Sun, Espanola, New Mexico	↗	3,753 US	English	Newspaper	Media & Infor...
	Delta Wind, Bethel AK	↗	3,723 US	English	Newspaper	Media & Infor...
	Big Bear Grizzly, Big Bear Lake, California	↗	3,705 US	English	Newspaper	Media & Infor...
	Kenbridge Victoria Dispatch	↗	3,695 US	English	Newspaper	Media & Infor...
	Desert News, Apple Valley, California	↗	3,657 US	English	Newspaper	Media & Infor...
	Claiborne Progress	↗	3,635 US	English	Newspaper	Media & Infor...
	The Community Voice, Rohnert Park, California	↗	3,589 US	English	Newspaper	Media & Infor...
	Beauregard News	↗	3,461 US	English	Newspaper	Media & Infor...
	Arcadia News, Phoenix AZ	↗	3,205 US	English	Newspaper	Media & Infor...
	The Interior Journal	↗	3,087 US	English	Newspaper	Media & Infor...
	Prentiss Headlight	↗	3,078 US	English	Newspaper	Media & Infor...
	Inyo Register, Bishop, California	↗	3,067 US	English	Newspaper	Media & Infor...
	La Zeta 93.7 FM	↗	2,958 Puerto Rico	Spanish	Broadcast Med...	Multicultural...
	El Zol 106.7 FM	↗	2,957 US	Spanish	Broadcast Med...	Multicultural...
	Castro Valley Forum [San Leandro, CA]	↗	2,806 US	English	Newspaper	Media & Infor...
	Latin Business Today	↗	2,589 US	English	Online News S...	Multicultural...
	Latin Business Today	↗	2,589 US	English	Online News S...	Multicultural...
	Latin Business Today	↗	2,589 US	Spanish	Online News S...	Multicultural...
	Jessamine Journal	↗	2,557 US	English	Newspaper	Media & Infor...
	City Sun Times, Scottsdale AZ	↗	2,485 US	English	Newspaper	Media & Infor...
	Imperial Valley Weekly [El Centro, CA]	↗	2,472 US	English	Newspaper	Media & Infor...
	Williams-Grand Canyon News [Williams, AZ]	↗	2,447 US	English	Newspaper	Media & Infor...
	Digital Conquer	↗	2,353 Global	English	Online News S...	Tech

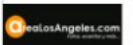
	Zeta 92.3 FM ↗	2,295 US	Spanish	Broadcast Med...	Multicultural...
	Cordele Dispatch ↗	2,211 US	English	Newspaper	Media & Infor...
	Palos Verdes Peninsula News, Palos Verdes Estates, Californi ↗	2,158 US	English	Newspaper	Media & Infor...
	WyoToday, Riverton, Wyoming ↗	2,113 US	English	Newspaper	Media & Infor...
	Tech Social Net ↗	2,033 US	English	Online News S...	Tech
	KHMT/KSVI [Billings, MT] ↗	1,937 US	English	Broadcast Med...	Media & Infor...
	Mountain News, Lake Arrowhead, California ↗	1,872 US	English	Newspaper	Media & Infor...
	The Sheet News, Mammoth Lakes, California ↗	1,804 US	English	Newspaper	Media & Infor...
	Discover Our Coast, Astoria, Oregon ↗	1,761 US	English	Newspaper	Media & Infor...
	Foresthill Messenger, Foresthill, California ↗	1,743 US	English	Newspaper	Media & Infor...
	Times of San Diego ↗	1,676 US	English	Newspaper	Media & Infor...
	Winters Express, Winters, California ↗	1,194 US	English	Newspaper	Media & Infor...
	Magnolia State Live ↗	1,193 US	English	Newspaper	Media & Infor...
	The Gazette, GTG Gazette, Grant City, Missouri ↗	1,183 US	English	Newspaper	Media & Infor...
	Leesville Leader ↗	1,150 US	English	Newspaper	Media & Infor...
	Quiza Me ↗	1,145 US	Spanish	Online News S...	General
	NEWSNet Michigan ↗	1,103 US	English	Broadcast Med...	Media & Infor...
	ChineseWire ↗	1,004 US	English	Online News S...	Media & Infor...
	Ashland Town News ↗	986 US	English	Newspaper	Media & Infor...
	Green & White Sheet, Tucson, AZ ↗	941 US	English	Newspaper	Media & Infor...
	Washington City Paper [Washington, DC] ↗	922 US	English	Newspaper	General
	Holladay Journal ↗	911 US	English	Newspaper	Media & Infor...
	Wyoming Press Association, Casper, Wyoming ↗	896 US	English	Newspaper	Media & Infor...
	Jornal Web Digital ↗	866 Brazil	Spanish	Online News S...	General
	The Gazette-Democrat, Anna, Illinois ↗	865 US	English	Newspaper	Media & Infor...
	The Gazette-Democrat, Anna, Illinois ↗	865 US	English	Newspaper	Media & Infor...
	La Ley 107.9 FM ↗	815 US	Spanish	Broadcast Med...	Multicultural...
	Fayetteville Connect ↗	810 US	English	Newspaper	Media & Infor...
	West Jordan Journal ↗	796 US	English	Newspaper	Media & Infor...
	City News Vegas, Las Vegas, Nevada ↗	783 US	English	Newspaper	Media & Infor...
	The Chillicothe Hometown Voice ↗	775 US	English	Newspaper	Media & Infor...

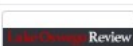
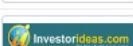
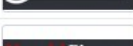
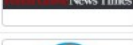
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	RSW Living Magazine [external link] [Sanibel, FL]	765	US	English	Newspaper	Media & Infor...
	NEWSnet Augusta [external link]	734	US	English	Broadcast Med...	Media & Infor...
	MyCaliforniaNews.com [external link]	729	US	English	Online News S...	Media & Infor...
	Energía, Industria, Comercio y Minería [external link]	698	US	Spanish	Online News S...	Multicultural...
	Chester County Press [external link]	692	US	English	Newspaper	Media & Infor...
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	Sugar House Journal [external link]	675	US	English	Newspaper	Media & Infor...
	El Perico [external link]	668	US	English	Online News S...	Multicultural...
	El Perico [external link]	668	US	Spanish	Online News S...	Multicultural...
	The Davis Journal [external link]	662	US	English	Newspaper	Media & Infor...
	Midvale Journal [external link]	656	US	English	Newspaper	Media & Infor...
	Columbia Business Monthly [external link]	650	US	English	Newspaper	Media & Infor...
	Lake Oconee Breeze [external link]	648	US	English	Newspaper	Media & Infor...
	Gaby Natale [external link]	645	US	Spanish	Online News S...	Multicultural...
	Sandy Journal [external link]	640	US	English	Newspaper	Media & Infor...
	Norfolk & Wrentham News [external link]	640	US	English	Newspaper	Media & Infor...
	My Utah News, Salt Lake City, Utah [external link]	615	US	English	Newspaper	Media & Infor...
	LatinEQUIS [external link]	609	US	English	Online News S...	Multicultural...
	La Familia de Broward [external link]	607	US	Spanish	Magazine	Multicultural...
	IT News Online [external link]	598	India	English	Trade Publica...	Tech
	Medway & Millis News [external link]	593	US	English	Newspaper	Media & Infor...
	KLXS-FM 95.3 [external link]	558	US	English	Broadcast Med...	Media & Infor...
	MB News [external link]	551	US	English	Newspaper	Media & Infor...
	New Mexico Press Association, Albuquerque, New Mexico [external link]	544	US	English	Newspaper	Media & Infor...
	Natick Town News [external link]	543	US	English	Newspaper	Media & Infor...
	Hopedale Town News [external link]	538	US	English	Newspaper	Media & Infor...
	The Clemmons Courier [external link]	537	US	English	Newspaper	Media & Infor...
	Herriman Journal [external link]	526	US	English	Newspaper	Media & Infor...
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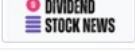
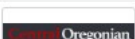
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	Bluegrass Live ↗	512	US	English	Newspaper	Media & Infor...
	WZZS-FM 106.9 La Número Uno / WTMY-AM 1280 La Número Uno ↗	506	US	Spanish	Broadcast Med...	Multicultural...
	West Valley City Journal ↗	493	US	English	Newspaper	Media & Infor...
	Franklin Town News ↗	492	US	English	Newspaper	Media & Infor...
	NEWSnet Buffalo ↗	489	US	English	Broadcast Med...	Media & Infor...
	South Salt Lake Journal ↗	477	US	English	Newspaper	Media & Infor...
	City Journals ↗	470	US	English	Newspaper	Media & Infor...
	Cape Coral Living Magazine ↗	458	US	English	Newspaper	Media & Infor...
	Murray Journal ↗	413	US	English	Newspaper	Media & Infor...
	Holliston Town News ↗	413	US	English	Newspaper	Media & Infor...
	KBEW-AM 1560 / KBEW-FM 98.1 COUNTRY [Blue Earth, MN] ↗	411	US	English	Broadcast Med...	Media & Infor...
	eNews Park Forest ↗	387	US	English	Newspaper	Media & Infor...
	VYRE Business News Global ↗	381	US	English	Online News S...	Business Serv...
	VYRE Business News Global ↗	381	US	English	Online News S...	Business Serv...
	VYRE Business News Global ↗	381	US	English	Online News S...	Business Serv...
	Cottonwood Heights Journal ↗	380	US	English	Newspaper	Media & Infor...
	Millcreek Journal ↗	374	US	English	Newspaper	Media & Infor...
	Taylorville Journal ↗	370	US	English	Newspaper	Media & Infor...
	Norwood Town News ↗	364	US	English	Newspaper	Media & Infor...
	Taos News ↗	363	US	English	Newspaper	Media & Infor...
	KZZI-FM 95.9 ↗	349	US	English	Broadcast Med...	Media & Infor...
	CBS Lake Charles ↗	348	US	English	Newspaper	Media & Infor...
	The Demopolis Times ↗	338	US	English	Newspaper	Media & Infor...
	Bonita & Estero Magazine ↗	318	US	English	Newspaper	Media & Infor...
	Hattiesburg.com ↗	300	US	English	Online News S...	Media & Infor...
	The Dam 94.3-FM ↗	300	US	English	Broadcast Med...	Media & Infor...
	Forefront Media News ↗	290	US	English	Online News S...	Media & Infor...
	Cheap Fun Things To Do ↗	290	US	English	Online News S...	Travel & Leis...
	Middletown Life Magazine ↗	290	US	English	Print Media	Media & Infor...
	Univision Minnesota ↗	289	US	Spanish	Broadcast Med...	Multicultural...
	West Virginia Latino News ↗	277	US	Spanish	News & Inform...	Multicultural...

	Techleaderspov.com		276	US	English	Online News S...	Tech
	Case 2:25-cv-00490-GW-SSC Document 78-4 Filed 09/17/26 Page 17 of 30		ID #:1129				
	KYNT-AM 1450	🔗	274	US	English	Broadcast Med...	Media & Infor...
	Janus Web3	🔗	273	US	English	Blog	Cryptocurrenc...
	Ahora News (New Jersey)	🔗	270	US	Spanish	Newspaper	Multicultural...
	Black Radio Network	🔗	265	US	English	News & Inform...	Media & Infor...
	The Pioneer	🔗	259	US	English	Newspaper	Media & Infor...
	NEWSnet Austin	🔗	257	US	English	Broadcast Med...	Media & Infor...
	NEWSNet Tampa	🔗	246	US	English	Broadcast Med...	Media & Infor...
	Montana Latino News	🔗	243	US	Spanish	News & Inform...	Multicultural...
	Ismael Cala Foundation	🔗	242	US	Spanish	Online News S...	Multicultural...
	NEWSnet Jacksonville	🔗	239	US	English	Broadcast Med...	Media & Infor...
	TDS Magazine	🔗	230	US	English	Magazine	Tech
	NEWSnet Nashville	🔗	229	US	English	Broadcast Med...	Media & Infor...
	NEWSnet Fresno	🔗	223	US	English	Broadcast Med...	Media & Infor...
	NEWSNet San Antonio	🔗	209	US	English	Broadcast Med...	Media & Infor...
	NEWSnet Boise	🔗	207	US	English	Broadcast Med...	Media & Infor...
	NEWSnet Hawaii	🔗	205	US	English	Broadcast Med...	Media & Infor...
	Univision Kansas City	🔗	205	US	Spanish	Broadcast Med...	Multicultural...
	NEWSNet Salt Lake City	🔗	202	US	English	Broadcast Med...	Media & Infor...
	NEWSNet Odessa	🔗	201	US	English	Broadcast Med...	Media & Infor...
	NEWSnet Minneapolis	🔗	201	US	English	Broadcast Med...	Media & Infor...
	KQRQ-FM 92.3	🔗	201	US	English	Broadcast Med...	Media & Infor...
	Draper Journal	🔗	195	US	English	Newspaper	Media & Infor...
	Gulf & Main Magazine	🔗	186	US	English	Newspaper	Media & Infor...
	NEWSnet Detroit	🔗	183	US	English	Broadcast Med...	Media & Infor...
	NEWSnet Atlanta	🔗	181	US	English	Broadcast Med...	Media & Infor...
	NEWSNet Sports	🔗	180	US	English	Online News S...	Media & Infor...
	NEWSnet Los Angeles	🔗	180	US	English	Broadcast Med...	Media & Infor...
	Mi Ciudad Tampa Bay	🔗	174	US	Spanish	Online News S...	Multicultural...
	KDAM-FM 94.3	🔗	173	US	English	Broadcast Med...	Media & Infor...
	Z106.3 FM	🔗	172	US	English	Broadcast Med...	Media & Infor...
	KCCR-FM 95.3 [Pierre, SD]	🔗	171	US	English	Broadcast Med...	Media & Infor...
	NEWSnet Columbia	🔗	171	US	English	Broadcast Med...	Media & Infor...
	SuperLatina TV	🔗	167	US	Spanish	Blog	Multicultural...

	KCCR-AM 1240 [Pierre, SD]	🔗	165	US	English	Broadcast Med...	Media & Infor...
	NEWSnet Anchorage	🔗	163	US	English	Broadcast Med...	Media & Infor...
	Needles Desert Star, Needles, California	🔗	162	US	English	Newspaper	Media & Infor...
	NEWSnet Monterey	🔗	159	US	English	Broadcast Med...	Media & Infor...
	Times of the Islands	🔗	157	US	English	Newspaper	Media & Infor...
	NEWSnet Louisville	🔗	153	US	English	Broadcast Med...	Media & Infor...
	NEWSNet Waco	🔗	150	US	English	Broadcast Med...	Media & Infor...
	South Valley Journal	🔗	150	US	English	Newspaper	Media & Infor...
	NEWSNet Pittsburgh	🔗	147	US	English	Broadcast Med...	Media & Infor...
	NEWSNet Norfolk	🔗	147	US	English	Broadcast Med...	Media & Infor...
	TheStreet	🔗	146	Global	English	Financial New...	Financial
	NEWSnet Columbus	🔗	130	US	English	Broadcast Med...	Media & Infor...
	Folsom Local News [Folsom, CA]	🔗	118	US	English	Online News S...	Media & Infor...
	Harlan Enterprise	🔗	106	US	English	Newspaper	Media & Infor...
	Tifton Gazette	🔗	105	US	English	Newspaper	Media & Infor...
	FACE Magazine	🔗	103	US	English	Newspaper	Media & Infor...
	Newsradio KOTA [Rapid City, SD]	🔗	91	US	English	Broadcast Med...	Media & Infor...
	Business Class News	🔗	91	US	English	Blog	Media & Infor...
	Boreal Community Media	🔗	78	US	English	Newspaper	Media & Infor...
	Colorado Cannabis Times [Denver, CO]	🔗	74	US	English	Newspaper	Media & Infor...
	NEWSnet Las Vegas	🔗	74	US	English	Broadcast Med...	Media & Infor...
	NEWSnet St. Louis	🔗	62	US	English	Broadcast Med...	Media & Infor...
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	NEWSNet Quincy	🔗	62	US	English	Broadcast Med...	Media & Infor...
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	NEWSNet Orlando	🔗	62	US	English	Broadcast Med...	Media & Infor...
	NEWSnet Myrtle Beach	🔗	62	US	English	Broadcast Med...	Media & Infor...
	Transporte, Logística & Comercio Internacional	🔗	61	US	Spanish	Newspaper	Multicultural...
	Southwest Daily News	🔗	58	US	English	Newspaper	Media & Infor...
	California Latino News	🔗	57	US	Spanish	News & Inform...	Multicultural...
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Case 2:25-cv-00490-GW-SSC Document 78-4 Filed 09/17/26 Page 19 of 30 Page ID #:1131					
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	NEWSNet Santa Barbara [link]	15 US	English	Broadcast Med...	Media & Infor...
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	QuietFluence [link]	Not Available US	English	Business/Comp...	Tech
	Your Oregon News [link]	Not Available US	English	Newspaper	Media & Infor...
	Woodburn Independent [link]	Not Available US	English	Newspaper	Media & Infor...
	Wilsonville Spokesman [link]	Not Available US	English	Newspaper	Media & Infor...
	Wheatland Sun [link]	Not Available US	English	Newspaper	Media & Infor...
	West Linn Tidings [link]	Not Available US	English	Newspaper	Media & Infor...
	Wallowa County Chieftain [link]	Not Available US	English	Newspaper	Media & Infor...
	Valley Times [link]	Not Available US	English	Newspaper	Media & Infor...
	Thomasville Times-Enterprise [link]	Not Available US	English	Newspaper	Media & Infor...
	The Outlook, Gresham, Oregon [link]	Not Available US	English	Newspaper	Media & Infor...
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	Territorial Dispatch [link]	Not Available US	English	Newspaper	Media & Infor...
	Stock Option News [link]	Not Available Global	English	Online News S...	Financial
	Seaside Signal [link]	Not Available US	English	Newspaper	Media & Infor...
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	Redmond Spokesman [link]	Not Available US	English	Newspaper	Media & Infor...
	Racine County Eye [link]	Not Available US	English	Newspaper	Media & Infor...
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	Nano Cap Stock Picks [link]	Not Available Global	English	Online News S...	Financial
	Parish News [New Orleans, LA] [link]	Not Available US	English	Newspaper	Media & Infor...
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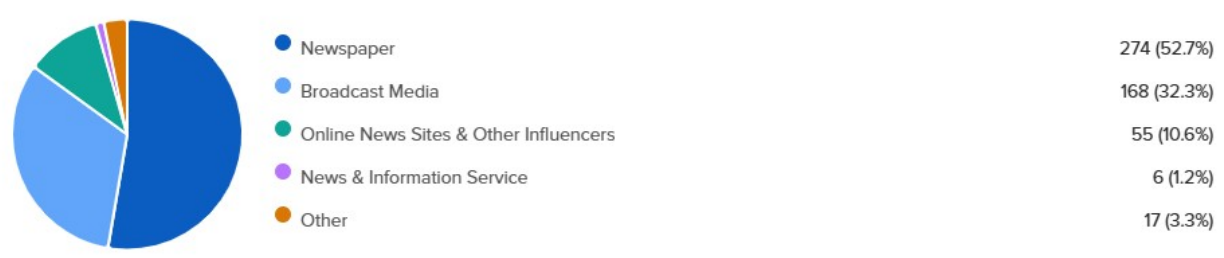
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	Magnificent Seven Stocks ↗	Not Available	Global	English	Online News S...	Financial
	The Madras Pioneer ↗	Not Available	US	English	Newspaper	Media & Infor...
	Lake Oswego Review ↗	Not Available	US	English	Newspaper	Media & Infor...
	The La Grande Observer ↗	Not Available	US	English	Newspaper	Media & Infor...
	InvestorIdeas ↗	Not Available	Global	English	Online News S...	Financial
	Hillsboro Tribune ↗	Not Available	US	English	Newspaper	Media & Infor...
	Hermiston Herald ↗	Not Available	US	English	Newspaper	Media & Infor...
	Herald Pioneer ↗	Not Available	US	English	Newspaper	Media & Infor...
	Gridley Herald ↗	Not Available	US	English	Newspaper	Media & Infor...
	GoInvest.com ↗	Not Available	Global	English	Online News S...	Financial
	Global Corporate Giants ↗	Not Available	Global	English	Online News S...	Financial
	Forest Grove News-Times ↗	Not Available	US	English	Newspaper	Media & Infor...
	Eye on Dunn County ↗	Not Available	US	English	Newspaper	Media & Infor...
	EV Stock Picks ↗	Not Available	Global	English	Online News S...	Financial
	Estacada News ↗	Not Available	US	English	Newspaper	Media & Infor...

OUTLET		AUDIENCE	LOCATION	LANGUAGE	SOURCE TYPE	INDUSTRY
 ESG Stock Info ↗	ESG Stock Info	Not Available	Global	English	Online News S...	Financial
 The News Courier ↗	The News Courier	Not Available	US	English	Newspaper	Media & Infor...
 Energy Stock Info ↗	Energy Stock Info	Not Available	Global	English	Online News S...	Financial
 East Oregonian ↗	East Oregonian	Not Available	US	English	Newspaper	Media & Infor...
 Dividend Stock News ↗	Dividend Stock News	Not Available	Global	English	Online News S...	Financial
 Dalton Daily Citizen ↗	Dalton Daily Citizen	Not Available	US	English	Newspaper	Media & Infor...
 The Daily Astorian ↗	The Daily Astorian	Not Available	US	English	Newspaper	Media & Infor...
 The Cullman Times ↗	The Cullman Times	Not Available	US	English	Newspaper	Media & Infor...
 Columbia County Spotlight ↗	Columbia County Spotlight	Not Available	US	English	Newspaper	Media & Infor...
 Chinook Observer ↗	Chinook Observer	Not Available	US	English	Newspaper	Media & Infor...
 Central Oregonian ↗	Central Oregonian	Not Available	US	English	Newspaper	Media & Infor...
 Idaho Enterprise ↗	Idaho Enterprise	Not Available	US	English	Newspaper	Media & Infor...
 Blue Mountain Eagle ↗	Blue Mountain Eagle	Not Available	US	English	Newspaper	Media & Infor...
 The Bulletin ↗	The Bulletin	Not Available	US	English	Newspaper	Media & Infor...
 Beaverton Valley Times ↗	Beaverton Valley Times	Not Available	US	English	Newspaper	Media & Infor...
 Baker City Herald ↗	Baker City Herald	Not Available	US	English	Newspaper	Media & Infor...
 Augusta Business Daily ↗	Augusta Business Daily	Not Available	US	English	Newspaper	Media & Infor...
 The Auburn Sentinel ↗	The Auburn Sentinel	Not Available	US	English	Newspaper	Media & Infor...
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 ADR Stock Picks ↗	ADR Stock Picks	Not Available	Global	English	Online News S...	Financial

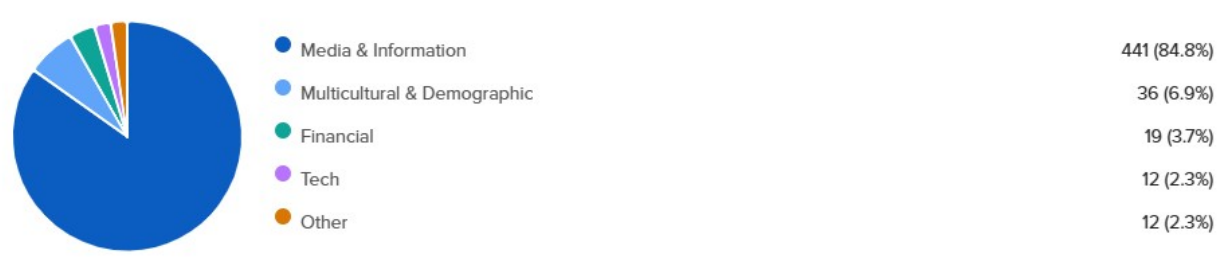
Pickup over time



Pickup by source type



Pickup by industry



Release traffic

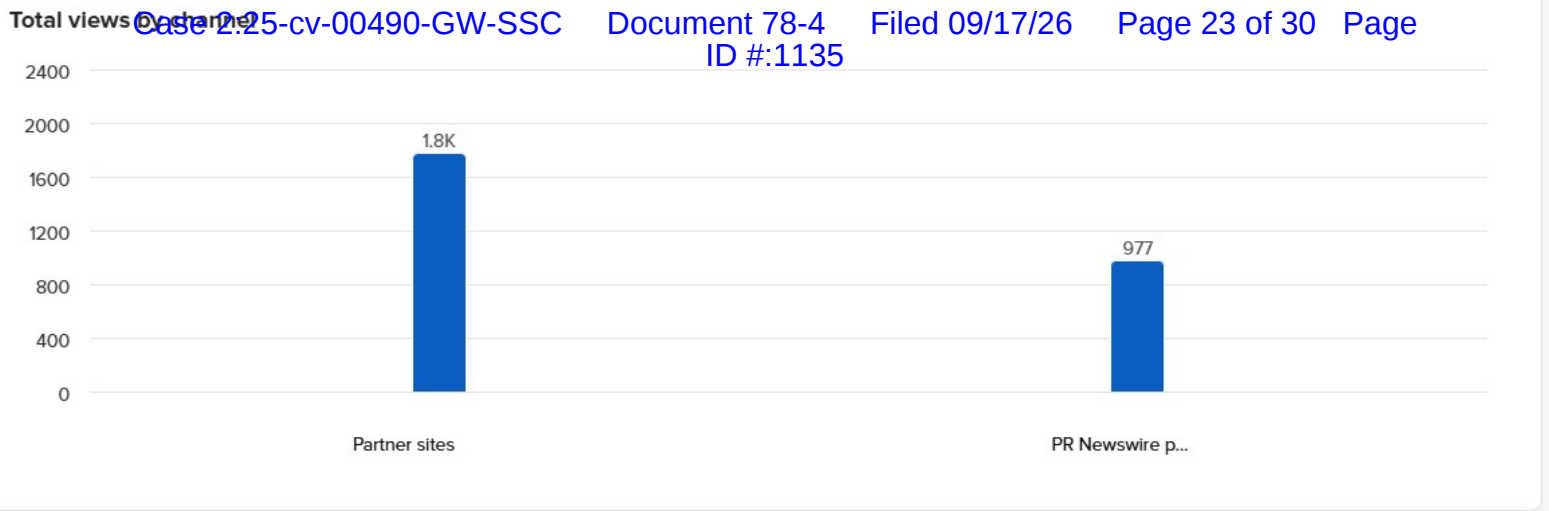
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2,753	5,572

Multimedia traffic

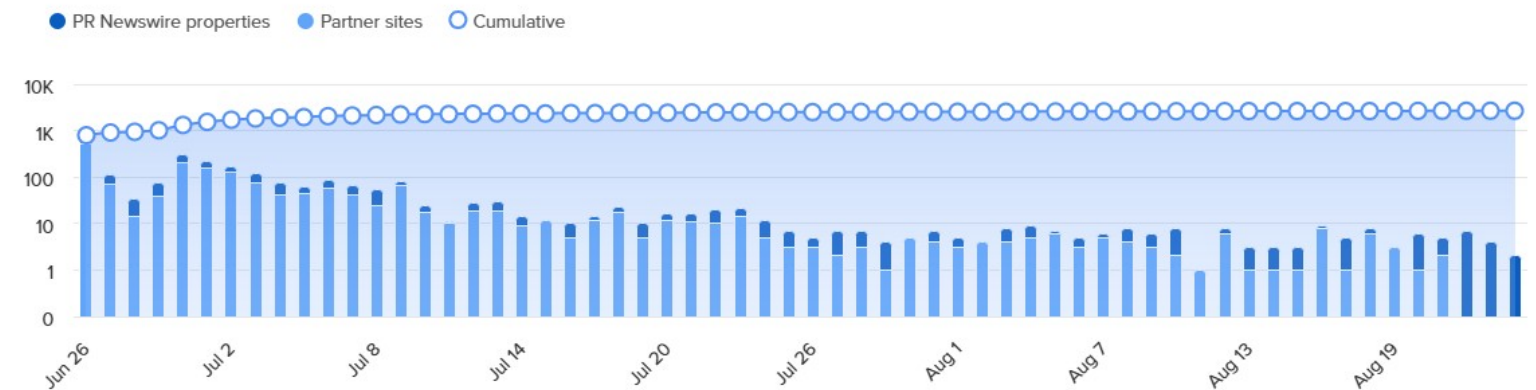
Views	Web crawler hits
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Image views are total number of unique human views of this image, showing its reach.

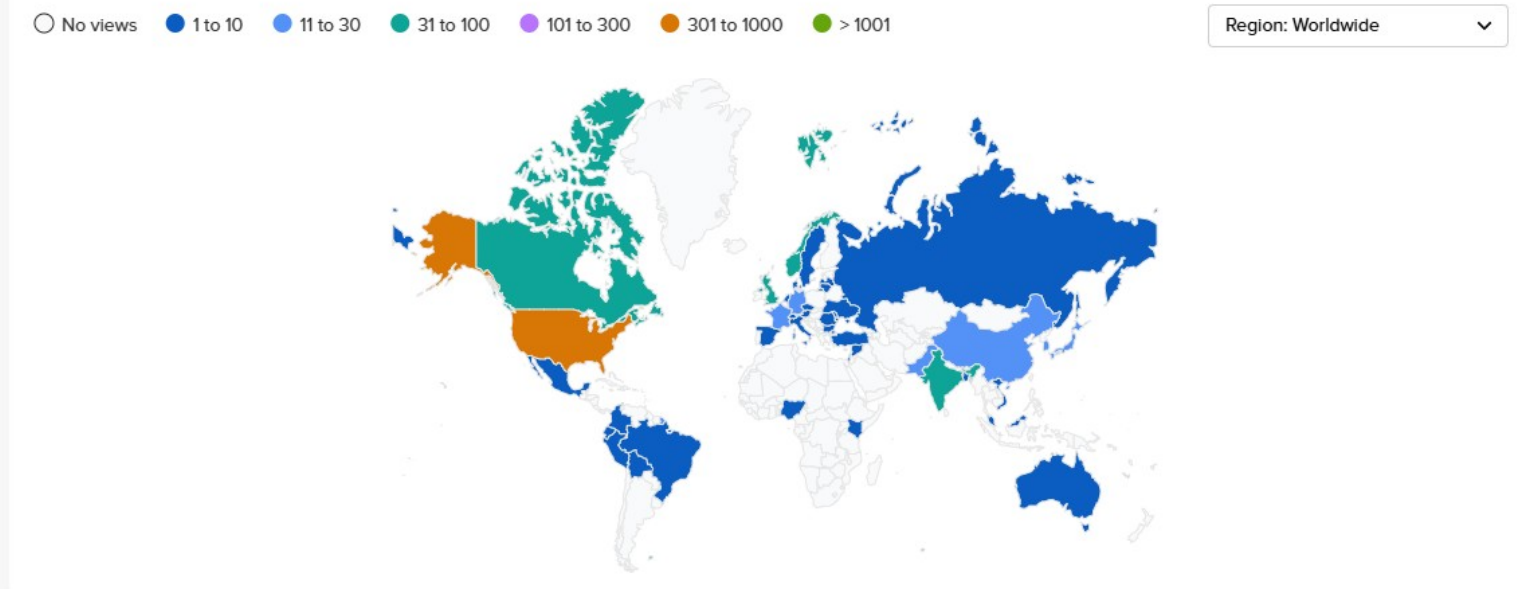
Web crawler hits are total number of times spiders/bots accessed this release, improving its visibility.



Total views over time



Total views by location

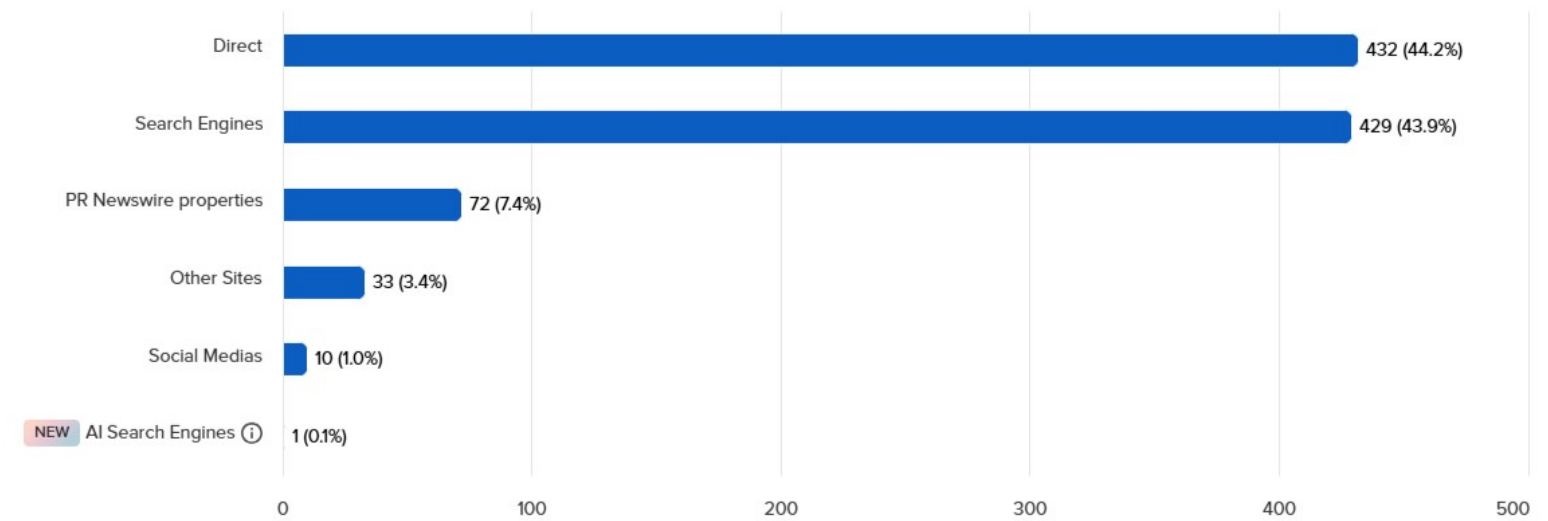


Device views on PR Newswire properties



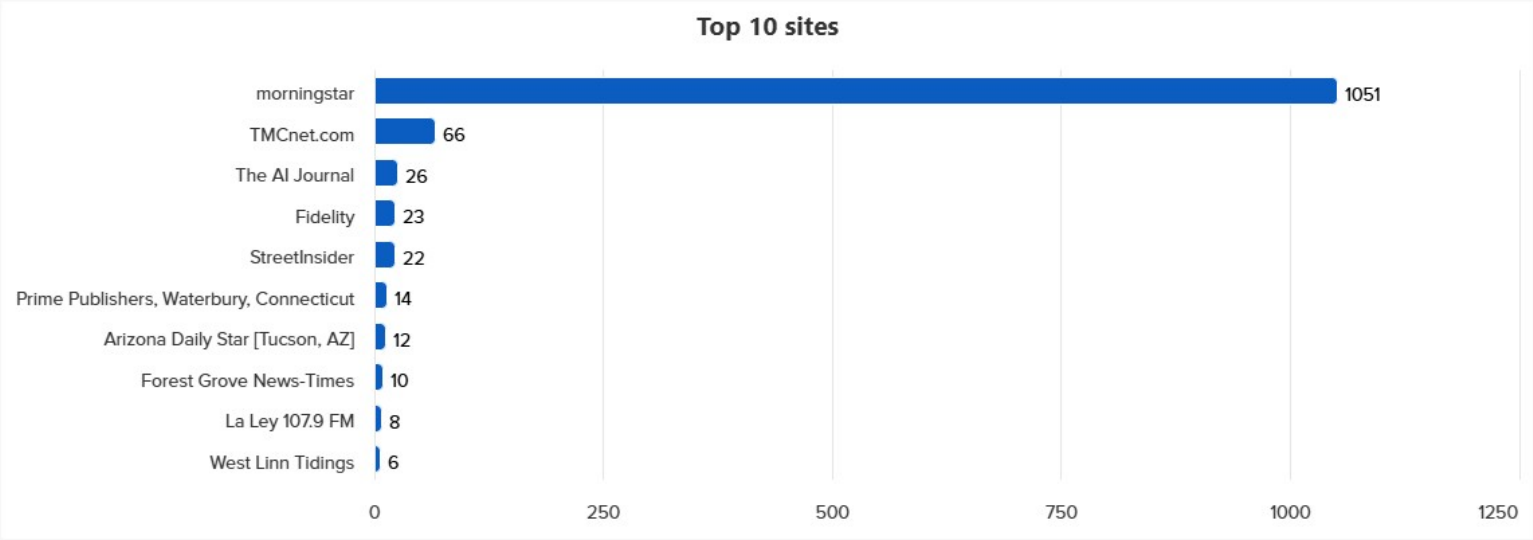
Traffic sources

Shows how viewers found your release



Source Type	Source	Instances
Direct		432
▼ Search Engines (5)		429
Search Engines	google	404
Search Engines	duckduckgo	17
Search Engines	bing	4
Search Engines	brave	3
Search Engines	yahoo	1
▼ AI Search Engines (1)		1
AI Search Engines	openai	1
▼ PR Newswire properties (1)		72
PR Newswire properties	prnewswire.com	72
▼ Social Medias (2)		10
Social Medias	twitter	9
Social Medias	reddit	1
▼ Other Sites (10)		33
Other Sites	morningstar.com	21
Other Sites	com.google.android.googlequicksearchbox	3
Other Sites	prnewswire.com.	2
Other Sites	links.streem.com.au	1
Other Sites	jetsli.de	1
Other Sites	yahoo.com	1
Other Sites	notifiedcrm.lightning.force.com	1
Other Sites	app.prnewswire.com	1
Other Sites	themoneyoverview.com	1
Other Sites	iris.prnewswire.com	1
Total		977

Shows the number of views on the top 10 partner sites



Audience

Total Potential A...JournalistsAP News Outlets

93,247,864521900

Journalist

Note: If you need the full journalist list, please use Copy PNG or Download PNG.

OUTLET	COUNTRY	BY INDUSTRY	MEDIA TYPE	VIEW COUNT
Accion Labs	India	Auto, Consumer Products, Entertainment, Environment, Healthcare, Media, Technology	Blogger, Consumer Periodicals, Content Creator, Influencer, Newspaper, Radio	4
NEWSDESK USA	United States of America	Broadcast, Media, Public Issues	Content Creator, Wire Service	4
Prodwrks	India	Features, Other, Technology	Other	4
PR	Malaysia	Technology	Other	4
Political Markup	United States of America	Broadcast, Entertainment, Features, Financial Services, General Business, Media, Public Issues	Blogger, Content Creator, Freelance/Writer, Influencer, Video content Creator	4
PixelBloom	Brazil	Healthcare	Radio	4
PitchBook	United States of America	Financial Services	Newspaper	4
On Tap Publishing	Kenya	Entertainment	Content Creator	4
Okinawa Marine	Japan	Broadcast, Environment, Features, Financial Services, Media, Public Issues, Technology, Transport, Travel	Content Creator, Freelance/Writer, Newspaper, Wire Service	4
Next Dimension Story	United Kingdom	Other	Other	4
NewsRx	United States of America	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Content Creator	4
NewsRise	Malaysia	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Freelance/Writer, Newspaper, Radio, Wire Service	4
NewsNation	United States of America	Travel	Television	4
News Aktuell	Switzerland	Other	Wire Service	4
Public Affairs HQ	United States of America	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Blogger, Content Creator, Other	4
New York 1 News	United States of America	Other	Television	4
Neowin	India	Technology	Freelance/Writer	4
Nawae Pakistan	Pakistan	Public Issues	Content Creator	4

National News Syndicate	United States of America	Technology	Freelance/Writer, Trade Periodicals	4
Monsenews	United States of America	Media	Video Content Creator	4
MNM Services	United States of America	Consumer Products, Features, Financial Services, General Business, Public Issues, Technology	Blogger, Content Creator, Freelance/Writer	4
McKnight's	United States of America	Healthcare, Technology	Freelance/Writer	4
Los Angeles Daily Journal/Southern ...	United States of America	Broadcast, Entertainment, Healthcare, Other, Public Issues, Transport, Travel	Freelance/Writer, Newspaper, Other	4
london juice company	United Kingdom	Consumer Products	Consumer Periodicals	4
Lobib ApS	Denmark	Travel	Blogger	4
Legal Support World	United States of America	Other	Blogger, Freelance/Writer	4
Prophotoshopexpert	United States of America	Other	Freelance/Writer	4
Randall-Reilly Publishing Co.	United States of America	Transport	Trade Periodicals	4
KrazzyMag	India	Auto, Entertainment, Financial Services, Healthcare, Media, Sports, Technology, Travel	Blogger, Content Creator, Other	4
Tech Trailblazers	United Kingdom	Features, Other, Technology	Blogger	4
WSAZ	United States of America	Financial Services	Television	4
WJET/WFXP/Nexstar Broadcasting	United States of America	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Financial Services, General Business, Healthcare, Media, Public Issues, Sports, Technology, Transport, Travel	Blogger, Newspaper, Television	4
Webaffinity	Pakistan	Technology	Blogger	4
Waste Advanage Magazine	United States of America	Auto, Energy, Environment, General Business, Heavy Industry, Technology, Transport	Trade Periodicals	4
Void Media	United States of America	Public Issues	Freelance/Writer	4
TVWNews India	India	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Newspaper	4
Thirteen Stories Publishing	United States of America	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Content Creator, Freelance/Writer	4
The Weather Channel	United States of America	Broadcast, Energy, Environment, General Business, Media, Public Issues, Travel	Television	4
The Vibe Out Media Outlet	United States of America	Technology	Video content Creator	4
The Review Ballerina	United States of America	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Blogger	4
The Community Press	Canada	Auto, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Public Issues, Sports, Technology, Transport, Travel	Content Creator, Newspaper	4
Supermoney.com	United States of America	Energy, Environment, Financial Services, General Business, Healthcare	Freelance/Writer	4
Record Gazette	United States of America	Entertainment, General Business, Media, Public Issues	Newspaper	4
Student	India	Heavy Industry	Other	4
STEWAWEL News & Information	United States of America	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Content Creator, Radio, Television, Wire Service	4
StateScoop	United States of America	Features, Other, Technology	Other	4
speniz	United States of America	Auto	Blogger	4
SOXO Radio	United States of America	Entertainment, Media	Blogger, Freelance/Writer, Radio	4
Soap Opera Network / ErrolLewis.com	United States of America	Auto, Broadcast, Consumer Products, Entertainment, Features, General Business, Media, Other, Sports, Technology, Travel	Blogger, Content Creator, Freelance/Writer, Newspaper, Other, Television	4
SiriusXM	United States of America	Sports	Television	4
SingularityNET	United States of America	Features, Financial Services, Healthcare, Technology	Blogger	4
Sing Tao Daily Toronto Edition 多伦...	Canada	Other	Newspaper	4
Scot Scoop	United States of America	Features	Newspaper	4
Salmde	United States of America	Healthcare	Blogger, Freelance/Writer	4
Right Symbol LLC	United States of America	Sports, Technology, Travel	Content Creator	4
LE DIPLOMATE MEDIA	France	Media	Content Creator	4
Kinnegat Times News	United States of America	Other	Newspaper	4

Kingsport Times-News	United States of America	Other	Newspaper	4
African American Leadership Network	United States of America	Technology	Other	4
cision	United States of America	Auto	Blogger	4
Dia'ani TV I Miami	United States of America	Broadcast, Features, Media	Blogger, Content Creator, Freelance/Writer, Influencer, Podcaster, Radio, Television, Video content Creator	4
Delion	Canada	Environment, Financial Services, General Business, Other, Technology	Blogger, Newspaper	4
Daily evening Newspaper	Pakistan	Public Issues	Newspaper	4
Cybernews	Lithuania	Consumer Products, Technology	Content Creator	4
Cutter Consortium, Data Analytics &...	United States of America	Financial Services, Healthcare, Technology	Blogger, Content Creator, Freelance/Writer, Trade Periodicals	4
Corporate Counsel Business Journal	United States of America	Energy, Environment, Financial Services, General Business, Healthcare, Public Issues, Technology	Blogger, Newspaper, Trade Periodicals, Video content Creator	4
Cognizant	India	Auto, Broadcast, General Business, Technology	Blogger, Freelance/Writer	4
CNBC-TV18	India	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Content Creator	4
CleverCrumb	India	Entertainment, Financial Services, Healthcare, Other, Public Issues, Sports, Technology, Travel	Blogger, Other	4
Cision (PR Newswire)	United States of America	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Blogger, Consumer Periodicals, Content Creator, Freelance/Writer, Newspaper, Other, Radio, Television, Trade Periodicals, Wire Service	4
CISION	India	Sports, Technology	Newspaper	4
Cision	India	Academe, Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Multicultural, Other, Public Issues, Sports, Technology, Transport, Travel	Blogger, Newspaper, Television	4
EarlyBird	United States of America	Technology	Freelance/Writer	4
Chemical Processing	United States of America	Energy, Environment, General Business, Heavy Industry, Technology	Trade Periodicals	4
CHANTELLEW	Monaco	Financial Services, General Business, Public Issues	Blogger	4
Cert Center Canada	Canada	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Blogger, Consumer Periodicals, Content Creator, Freelance/Writer, Influencer, Newspaper, Other, Podcaster, Radio, Television, Trade Periodicals, Video content Creator, Wire Service	4
CBC	Canada	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Radio	4
Caudex Medical Communications	United States of America	Healthcare	Other	4
CanGlobal Media	Canada	Auto, Broadcast, Entertainment, Features, General Business, Heavy Industry, Media, Public Issues, Technology, Transport, Travel	Blogger, Consumer Periodicals, Content Creator, Freelance/Writer, Newspaper, Radio, Television	4
C4 Trends	United States of America	Healthcare, Media, Technology	Trade Periodicals	4
Basex, Accura Media Group, Freque...	United States of America	Auto, Technology, Travel	Trade Periodicals	4
AtmosEsp	United States of America	Entertainment, Media	Other	4
ALM Global	United States of America	Technology	Content Creator, Trade Periodicals	4
ALM	United States of America	Other	Newspaper	4
Al Khair Charity Group	Syria	Broadcast, Consumer Products, Entertainment, Environment, Features, Financial Services, Healthcare, Media, Other, Public Issues	Blogger, Content Creator, Freelance/Writer, Other	4
dot.LA	United States of America	Auto, Consumer Products, Entertainment, Features, Financial Services, General Business, Healthcare, Media, Technology, Transport	Consumer Periodicals, Content Creator	4
Economic Review	Pakistan	Auto, Energy, Features, Financial Services, Media, Public Issues, Sports	Freelance/Writer, Newspaper, Trade Periodicals	4
Journalist	United States of America	Travel	Video content Creator	4
EL PAIS	United States of America	Consumer Products, Energy, Entertainment, Financial Services, General Business, Media, Technology, Transport, Travel	Newspaper	4
ETM...	Turkey	Auto, Entertainment, Financial Services, Technology	Content Creator	4

IT Business Podcast	Turkey	Auto, Entertainment, Financial Services, Technology	Content Creator	4
indirentalz.com	India	Consumer Products	Blogger	4
Inc42	India	Auto, Consumer Products, Energy, Financial Services, General Business, Healthcare, Technology	Newspaper	4
Houston Chronicle	United States of America	Features	Newspaper	4
HomeArtsContentandCopywriting.co...	United States of America	Consumer Products, Environment, Features, Other, Travel	Other	4
heart & soul	United States of America	Entertainment, Healthcare, Travel	Consumer Periodicals, Content Creator, Radio	4
GLD LLC	United States of America	Travel	Influencer	4
GHEP, Rock and Art Culture magazin...	Canada	Energy, Environment, Features, Healthcare, Media, Public Issues, Technology	Freelance/Writer, Newspaper, Other	4
Gaceta UNAM	Mexico	Environment, Features, Healthcare, Media, Public Issues, Sports, Travel	Content Creator, Newspaper	4
Futurride	United States of America	Auto, Transport	Blogger, Content Creator, Trade Periodicals	4
Future Citizen News	United States of America	Financial Services, General Business, Other, Public Issues, Technology	Blogger, Newspaper	4

Associated Press Outlet

OUTLET NAME	LOCATION	STATE	CITY	SOURCE TYPE	AUDIENCE
C-SPAN	US	DC	Washington	Television	86,200,000 Subscribers
Scribd, Inc.	US	CA	San Francisco	Aggregator	43,531,670 Visitors per Month
FoxNews.com	US	NY	New York	Online	32,516,438 Visitors per Month
CBS News Radio	US	NY	New York	Radio	30,000,000 Broadcast Audience
New York Times Digital	US	NY	New York	Newspaper	29,886,442 Visitors per Month
Apple Inc.	US	CA	Cupertino	Organization/Company	29,709,459 Visitors per Month
CNBC.com	US	NJ	Englewood Cliffs	Online	26,089,260 Visitors per Month
CBSnews.com	US	NY	New York	Online	26,080,671 Visitors per Month
abcnews.com	US	NY	New York	Online	24,167,779 Visitors per Month
U.S. News & World Report	US	DC	Washington	Magazine	23,945,529 Visitors per Month

Engagement

Click-throughs

833

Click-throughs: 833

Number of times your release sent visitors to the pages you linked to.

Click-throughs

URL	VIEWS
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Shares: 0

Break down of the types of sharing your release generated

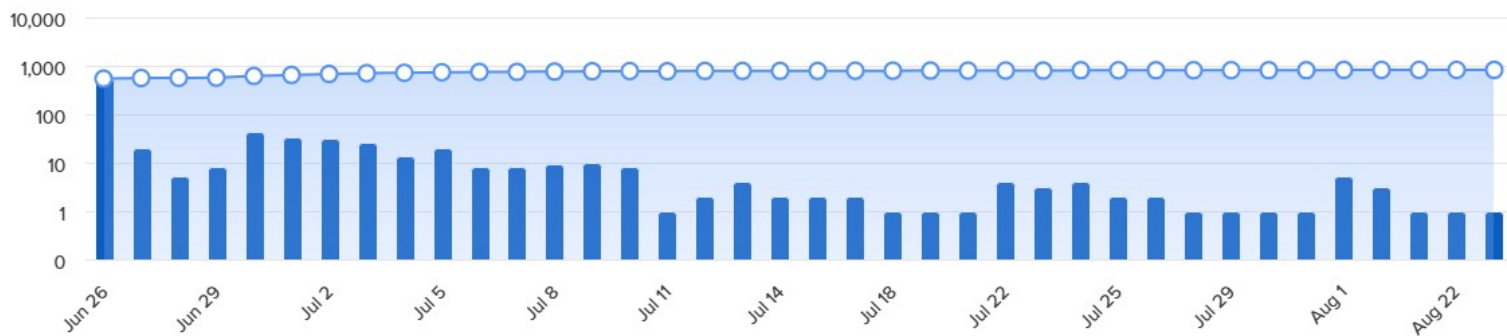
Shares

TYPE OF SHARES

SHARES

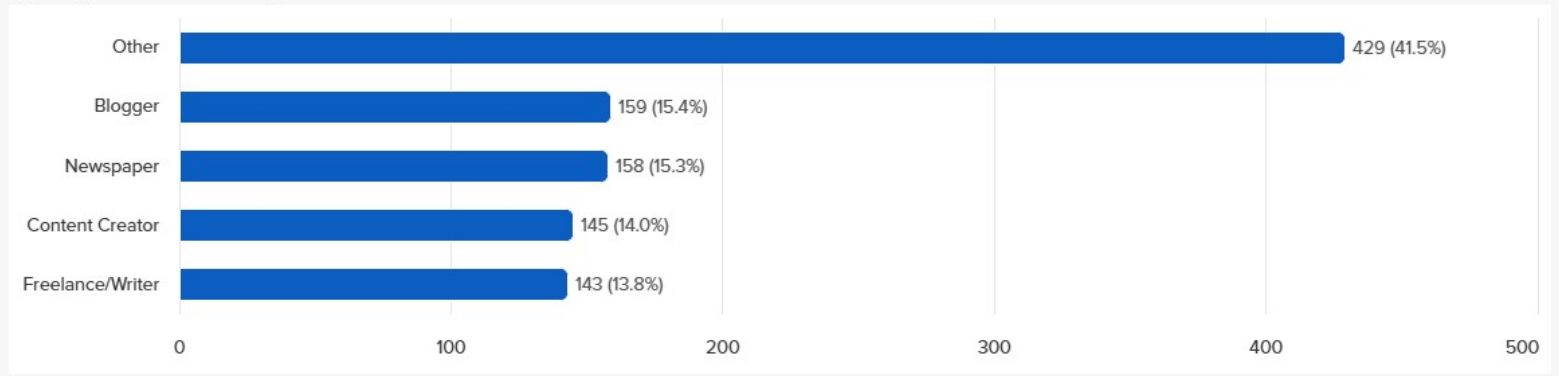
Engagement over time

Click-throughs Downloads Shares Cumulative



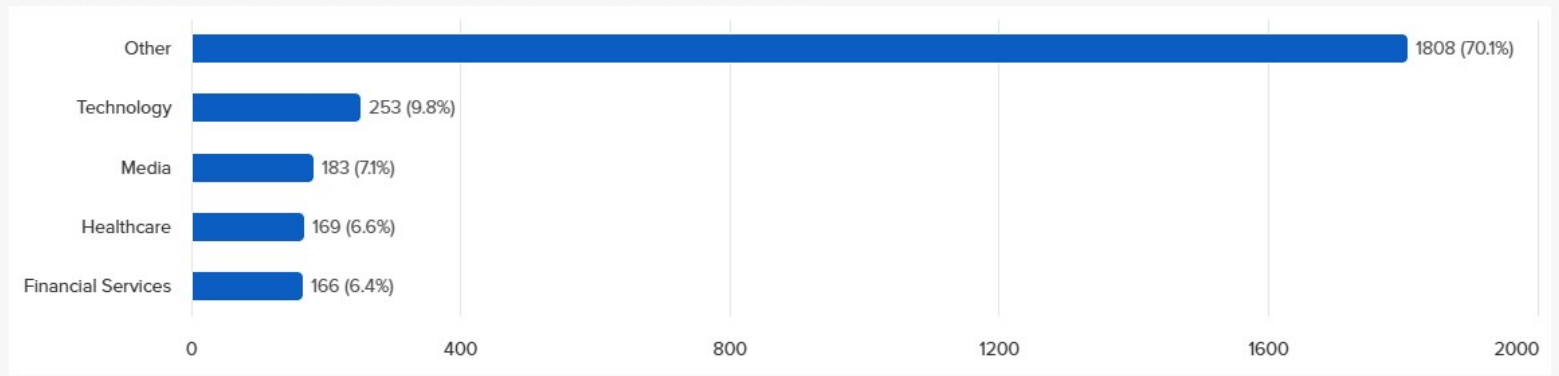
Type

Types of journalists who access your release the most, sourced from PR Newswire for Journalists



Industry

Industries that journalists access your release the most, sourced from PR Newswire for Journalists



Location

Locations where journalists access your release the most, sourced from PR Newswire for Journalists

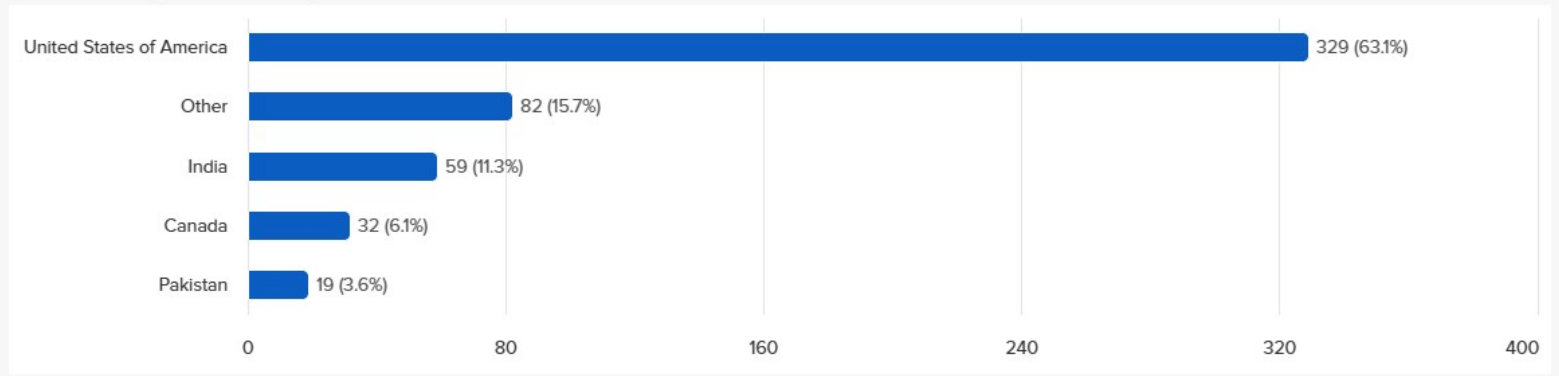


EXHIBIT E

Short Notice

Judge strikes down Pentagon press escort requirement

Policy raised First Amendment questions

BrieAnna J. Frank
USA TODAY

A federal judge on June 30 blocked the Pentagon from enforcing its policy requiring journalists to be escorted through the premises at all times.

In his opinion, U.S. District Judge Paul Friedman said the country’s founders “believed that the nation’s security requires a free press and an informed people and that such security is endangered by governmental suppression of political speech.”

“As our country celebrates its 250th anniversary this very week, that principle must not be abandoned now,” he wrote.

The legal battle started when the Pentagon implemented a press policy in October 2025 that said journalists who “solicit” information not approved for public release could lose press access to the building. Experts told USA TODAY at the time that the policy raised First Amendment questions but said courts would ultimately have to decide if the policy was unconstitutional.

The New York Times first sued over the matter in December. Friedman blocked the Pentagon from implementing the policy in March, which prompted the Department of War, formally the Department of Defense, to establish an interim policy that shuttered journalists’ longtime workspace and required the press to be escorted through the building.

Pentagon spokesperson Sean Parnell said at the time that a “new and improved press workspace will be established in an annex facility outside the Pentagon, but still on Pentagon grounds, and will be available when ready.” Press freedom groups condemned the revamped policy and accused the Pentagon of violating the judge’s order.

Friedman concurred in an April 9 ruling, saying the Pentagon “invoked slightly different language to achieve that same unconstitutional result.”

The New York Times filed a second lawsuit in May, saying the escort requirement was “unreasonable because

it imposes significant burdens on reporters’ newsgathering” and “wholly unnecessary in view of the long history and tradition of unescorted press access.”

Friedman wrote in his June 30 opinion that The New York Times was likely to succeed in arguing that the escort requirement violates the First Amendment in part through being retaliatory.

He said Pentagon officials’ public statements about mainstream news outlets – including Secretary Pete Hegseth’s remark comparing what he called the “legacy Trump-hating press” to biblical “Pharisees” – are “powerful evidence of the Department’s retaliatory motive” in implementing the policy.

Parnell said the Pentagon would appeal the decision in a June 30 post on X.

“Unescorted access to the Pentagon allowed journalists to observe activity patterns and develop relationships that contributed to repeated unauthorized disclosures of operational plans and intelligence,” he said. “The court’s order effectively restores that risky environment at a time when protecting our military’s secrets is more critical than ever.”

New York Times spokesperson Charlie Stadlander said Friedman’s order “reaffirms the First Amendment rights of the press to cover the Pentagon without restrictions designed to prevent the public from knowing what the military is doing.”

“We are pleased that the district court has, once again, put a stop to the Department’s continued unconstitutional efforts to restrict independent reporting about the Pentagon,” Theodore J. Boutrous, Jr. of Gibson Dunn, the law firm representing The New York Times in the case, said. “The Department’s Interim Policy, including its ‘escort requirement,’ is exactly what the district court found it to be: retaliation against the Times for exercising its First Amendment rights.”

USA TODAY’s coverage of First Amendment issues is funded through a collaboration between the Freedom Forum and Journalism Funding Partners. Funders do not provide editorial input.

More than half a million stolen in ATM ‘jackpotting’ scheme

Jeanine Santucci
USA TODAY

Four men stole more than half a million dollars from Connecticut ATMs and have been charged in federal court, authorities said.

The robberies unfolded in August 2025, according to the U.S. Attorney’s Office for the District of Connecticut. The men conspired to steal cash from at least nine ATMs that month in a “jackpotting” scheme, which involves “using specialized hardware and malware that forces an ATM to dispense its stored cash,” prosecutors said in a June 29 press release.

Euclides Moreno Itanare, 28, of Raleigh, North Carolina; Willian Ricardo Flores, 49, of New York City; Alberto Jose Freitas Arvilla, 41, of New York City; and Luis Jose Freitas Arvilla, 38, of Lynn, Massachusetts, were arrested on June 25 and charged with interstate transportation of stolen property and conspiracy. They are all Venezuelan nationals, prosecutors said.

At least nine ATMs in southern Connecticut were targeted between Aug. 8 and Aug. 18, 2025, according to a criminal complaint. One of the ATMs had a recently installed software patch that prevented the men from stealing any cash, but a total of \$529,220 was taken from the eight others, investigators said in the complaint. An ATM in Fairfield, Connecticut, at a rest area off Interstate 95 had the highest total stolen, at \$136,000, the complaint said.

If convicted, the men face up to 10 years in federal prison for the interstate transportation of stolen property charges and up to five years for the conspiracy charges. USA TODAY has reached out to the Office of the Federal Public Defender for the District of Connecticut for comment.

How ‘jackpotting’ worked

According to investigators in the

criminal complaint, the men carried out a similar pattern at each of the ATMs they hit in the scheme, as seen on surveillance videos.

First, Alberto Freitas Arvilla would unplug the ATM and use a bezel key to open its hood, while Luis Freitas Arvilla stood watch. Alberto Freitas Arvilla inserted a card into a computer component of the ATM, then plugged the ATM back in and turned it on, then left the area.

Itanare, Flores and Luis Freitas Arvilla would then take turns appearing to approach the ATM, insert a card and enter a PIN, withdraw cash, and then repeat the process. They would sometimes change clothes to “avoid suspicion when approaching the same ATM multiple times for extended periods,” investigators wrote in the complaint. They would continue the process for up to several hours at each location, according to the complaint.

More than \$500,000 stolen

What was stolen from each ATM in Connecticut targeted by the men, according to the criminal complaint:

- Aug. 8, 2025: \$23,200 at Cumberland Farms convenience store in Milford
- Aug. 8, 2025: No loss at Cumberland Farms in Ansonia because of a software patch that prevented this type of theft
- Aug. 14, 2025: \$136,000 at an I-95 rest area in Fairfield
- Aug. 15, 2025: \$66,400 at an I-95 rest area in Branford
- Aug. 16, 2025: \$42,020 at an I-95 rest area in Madison
- Aug. 16, 2025: \$84,000 at an I-95 rest area in Madison
- Aug. 17, 2025: \$61,600 at an I-95 rest area in Darien
- Aug. 18, 2025: \$58,400 at an I-95 rest area in Darien
- Aug. 18, 2025: \$57,600 at an I-95 rest area in Darien



Rep. Thomas Kean Jr., R-NJ, arrives at the U.S. Capitol with his wife, Rhonda Kean, on June 30. ANNA MONEYMAKER/GETTY IMAGES

GOP lawmaker explains his four-month absence

Zachary Schermele
USA TODAY

WASHINGTON – After four months away from his taxpayer-funded job in Congress, Rep. Thomas Kean Jr. finally revealed the reason behind his absence.

In a June 30 speech on the floor of the House of Representatives, the Republican lawmaker said he was hospitalized several months ago and diagnosed with depression. He said his doctors recommended that he remain hospitalized and explained it would be the “fastest way to recover.”

“Asking for help is not a weakness,” he said. “It is a strength.”

Kean did not offer more specific details about his hospitalization. He said that many people don’t fully appreciate the severity of depression, one of the most common mental health disorders affecting millions of Americans. The depression rate among U.S. adults has remained at historic highs in recent years, sitting at more than 18% in the most recent Gallup poll.

“Until you experience it yourself, it is difficult to fully understand how powerful this illness can be,” Kean said.

The congressman, who represents New Jersey’s 7th Congressional Dis-

trict and is the son of a former Garden State governor, missed more than 140 votes since March. USA TODAY’s repeated attempts to reach him during his absence were unsuccessful.

“Like many people, I believed that I could simply push through,” he said. “But I agreed to follow my doctors’ recommendations.”

The lawmaker is facing a tough general election in November. The nonpartisan Cook Political Report shifted its outlook last November for the race from Republican to a toss-up. The Democrat running to replace him, former Navy helicopter pilot Rebecca Bennett, has already hammered his voting record. So has the national Democratic Party.

“Career politician Tom Kean Jr. has never been more vulnerable,” Democratic Congressional Campaign Committee spokesperson Eli Cousin said in a May statement.

Republican House Speaker Mike Johnson, who was in touch with Kean during his absence, has consistently defended the congressman. The GOP leader said he hoped Kean’s speech about his “health condition” would help clarify his absence.

“If it were me, I would have been more specific about that, and I encouraged him to be,” Johnson said. “It will be understandable to you.”

LEGAL NOTICE

Your Personal Information May Have Been Affected by a Data Security Incident Involving STIIZY Inc.

A court authorized this notice. This is not a solicitation from a lawyer.

This notice is only a summary of the key Settlement terms. A full copy of the Settlement Agreement and Long Form Notice is available on the Settlement Website at www.StiizyDataBreachSettlement.com or by calling 1-855-907-2590.

What is this lawsuit about? This is a Court-authorized Class Notice of a proposed Settlement in a class action lawsuit, *In Re: STIIZY Inc. Data Breach Security Litigation*, No. 2:25-cv-00490 (“Action”), pending in the U.S. District Court for the Central District of California. The Settlement will resolve a lawsuit brought on behalf of persons who allege STIIZY, Inc. (referred to as “STIIZY” or “Defendant”) committed legal violations in connection with an October 2024 data breach where certain information was stolen from Defendant’s servers (the “Data Security Incident”). STIIZY denies these allegations, denies violations of any law, and denies all liability.

Who is a Class Member? The Class includes all persons whose personally identifiable information or private health information (collectively “Private Information”) was accessed, compromised, or stolen in the Data Security Incident announced by Defendant on January 7, 2025. There is also a subclass that includes all persons who were residents of California when doing business with Defendant, whose Private Information was accessed, compromised, or stolen in the Data Security Incident announced by Defendant on January 7, 2025.

What are the benefits? Important: You must submit a claim to receive any monetary benefit or credit monitoring. If you do nothing you will receive nothing – but you will still be bound by this Settlement.

The Settlement provides the following benefits:

- **Credit Monitoring and Insurance Services:** All Class Members may elect, in addition to the Documented Losses or Pro Rata Cash Fund Payment compensation options, to receive two years of Credit Monitoring, Fraud Consultation, and Identity Theft Restoration Services, which will include (i) up to \$1 million dollars of identity theft insurance coverage and (ii) three-bureau credit monitoring.
- **Pro Rata Cash Fund Payment:** If you do not wish to submit documentation, you may instead elect to receive a Pro Rata Cash Payment by submitting a timely and valid Claim Form. No documentation is required.
- **Compensation for Documented Losses:** Class Members may submit a claim for Documented Losses up to seven-thousand and five-hundred dollars (\$7,500) per individual. Defendant will pay valid and timely submitted claims for the following: unreimbursed costs, expenses or charges incurred addressing or remedying identity theft, fraud, or misuse of personal information and/or other issues reasonably traceable to the Data Security Incident upon submission of an approved claim and supporting documentation. If you intend to claim these benefits, you must file your claim online or mail in the claim form available on the settlement website.
- **Business Practice Changes:** Defendant has also agreed to make certain business practice changes that will enhance its cybersecurity system to better protect customer data in the future.

How to file a claim. To receive benefits, you must submit a Claim Form online or by mail. Claim Forms are available at www.StiizyDataBreachSettlement.com and must be submitted or postmarked by **September 10, 2026. If you do not submit a Claim Form, you will not receive Settlement benefits.**

What are my other options?

Do Nothing: If you do nothing, you remain in the Settlement. You give up your rights to sue but you will not get any compensation as a Class Member. **You must submit a Claim Form if you wish to receive Settlement benefits and will not receive Settlement benefits if you do not do anything.**

Exclude Yourself: You can get out of the Settlement and keep your right to sue about the claims in this Action, but you will not get any compensation from the Settlement. You must submit a Request for Exclusion to the Claims Administrator by August 26, 2026.

Object: You can stay in the Settlement but tell the Court why you think the Settlement should not be approved. Your written objection must be submitted by August 26, 2026.

Detailed instructions on how to file a Claim Form, exclude yourself, or object can be found on the found on the Settlement Website.

Attend a hearing: The Court will hold the Final Approval Hearing on October 19, 2026 at 8:30 a.m. PT, to consider whether the proposed Settlement is fair, reasonable, and adequate, to consider Plaintiff’s Counsel’s Fees and Expenses amount for attorneys’ fees not to exceed \$737,500 plus reasonable expenses, estimated at \$30,000, and request a Service Award of \$2,500 for each Class Representative (\$15,000 total), and to consider whether and if it should be approved. The date and time of the hearing may change without further notice. Please check the Settlement Website to confirm that date has not changed and for a Zoom link to remotely attend the hearing. You may attend the hearing, with your own attorney, at your own expense, but you do not have to.

This is only a summary. For additional information, including a copy of the Settlement Agreement and other documents, visit the documents section of the Settlement Website or contact class counsel at 1-858-351-3077 or stiizydb@clarksonlawfirm.com. You may also contact the Claims Administrator to update your address or contact information by visiting the Settlement Website or call 1-855-907-2590.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

1-855-907-2590

www.StiizyDataBreachSettlement.com

ABC: FCC ‘chilling speech’ before election

Network, agency spar over equal time rule

BrieAnna J. Frank
USA TODAY

ABC accused the Federal Communications Commission of “chilling speech ahead of the ... 2026 general election” in a July 6 legal filing submitted as part of an ongoing proceeding related to the commission’s equal time rules.

The FCC initiated an “enforcement action” against the Disney-owned ABC in February after state Rep. James Talarico, D-Texas, appeared on “The View” while running in the state’s Democratic U.S. Senate primary.

FCC Chairman Brendan Carr has characterized the matter as a procedural issue, saying ABC hadn’t submitted the proper paperwork declaring an appearance by a political candidate that would open the window for an opposing candidate to request “comparable time and placement.” Commissioner Anna Gomez, whom former President Joe Biden

appointed in 2023, however, has accused the FCC of engaging in partisan politics to support President Donald Trump’s objectives.

The FCC began accepting public input as to whether “The View” should be exempt from the requirement to offer equal broadcast opportunities to political candidates in May. More than 50,000 comments had been filed by late June, when ABC launched an on-air campaign to encourage public participation in the matter.

ABC has maintained that the exemption the FCC granted “The View” in 2002 should remain in place, saying in its July 6 filing that the program “has not materially changed” since then.

The filing said the “overwhelming majority” of public comments supported ABC but also responded to counterpoints raised by commenters who opposed an exemption for the show.

To those who criticized “The View” for being what they described as “opinion-driven,” for example, the network said denying an exemption based on perspective would be an unconstitu-

tional “prototypical content- or viewpoint-based restriction.”

As for concerns about the ratio of right-leaning to left-leaning guests on the show, ABC said the notion of establishing a “government-approved ideological quota” in the name of balance would be “not a regulatory standard, but a surveillance regime.”

“The First Amendment does not permit the government to sit in an editor’s chair,” the filing said.

Gomez concurred July 7 on X: “You don’t have to like their coverage to see the danger here,” she wrote. “Handing government the power to decide what’s newsworthy and which guests to feature is a threat to press freedom, no matter which party is in charge.”

The filing also accused the FCC of targeting “daytime and late-night television – programs perceived as unfriendly to the current administration – while leaving untouched the vast landscape of talk radio, where candidates routinely appear without their opponents.”

In a separate matter, the FCC in April ordered the Disney-owned ABC to file li-

cense renewals for its eight television stations by late May – years ahead of schedule. The order said the commission was investigating “possible violations of the Communications Act of 1934 and the FCC’s rules.”

Disney said its “record demonstrates our continued qualifications as licensees under the Communications Act and the First Amendment and are prepared to show that through the appropriate legal channels.”

An FCC spokesperson said “ABC should focus on complying with its public interest obligations, rather than misleading the public about them” in a July 7 email to USA TODAY.

The network in its filing said “there is nothing ‘misleading’ about alerting the public that the proceeding could impinge on a broadcaster’s editorial discretion over who appears on its programming.”

USA TODAY’s coverage of First Amendment issues is funded through a collaboration between the Freedom Forum and Journalism Funding Partners. Funders do not provide editorial input.

Texas orders cleanup of thousands of turbine blades

Court rules on illegal dumping by company

Mateo Rosiles
USA TODAY NETWORK

A Texas court has granted the state a temporary injunction to prevent wind turbine recycling companies from accepting shipments of wind turbine blades and requires them to begin the cleanup of two West Texas facilities where blades have been discarded illegally.

Texas Attorney General Ken Paxton announced Tuesday that his office obtained a temporary injunction against Global Fiberglass Solutions, Inc. and other affiliated entities. The injunction also requires the company to clean up thousands of discarded turbine blades at two facilities in Sweetwater, Texas.

“No new wind turbine blade ship-

ments will be accepted at these illegal sites and the defendants are now legally required to begin cleaning up the thousands of discarded blades they irresponsibly abandoned in Sweetwater,” Paxton said in a statement.

“We will not allow Texas land to be used as an illegal dumping ground.”

The injunction comes after Paxton sued Global Fiberglass Solutions in February, alleging that the wind turbine recycling company failed to properly dispose of the waste and instead created a stockpile of more than 3,000 wind turbine blades and parts.

These stockpiles, according to Paxton’s office, created unpermitted, illegal disposal sites that have affected the land and threaten nearby communities. The lawsuit is scheduled to be heard on Sept. 13, 2027.

USA TODAY reached out to Global Fiberglass Solutions for comment, but has not heard back.



A wind turbine blade awaits recycling at Global Fiberglass Solutions in Sweetwater, Texas, in 2021.
RONALD W. ERDRICH/USA TODAY NETWORK

What does the injunction do?

The injunction stipulates a timeline.

- **June 10:** Global Fiberglass Solutions must stop accepting shipments of wind turbine blades and stop disposing of them.

- **30 days after June 10:** Global Fiberglass Solutions must deposit a bond of at least \$3.5 million with the Texas Commission on Environmental Quality as financial assurance.
 - **180 days after June 10:** The company must obtain all necessary permits from TCEQ to process the blades at its facilities, then process and remove the blades.
 - **Or identify a secondary TCEQ-approved waste disposal facility that can properly accept, process, and dispose of the blades.**
 - **270 days after June 10:** The company must remove 25% of the blades.
 - **One year after June 10:** The company must remove 50% of the blades.
 - **460 days after June 10:** The company must remove 75% of the blades.
 - **550 days after June 10:** The company must remove all the blades.
- Mateo Rosiles is Texas Connect reporter for USA TODAY Network*



30M+
People Served



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White House report targets Smithsonian

It says history museum promotes ‘radical’ agenda

Christopher Cann
USA TODAY

WASHINGTON – Tensions between the Trump administration and the Smithsonian Institution have escalated after a White House report accused the National Museum of American History of promoting a “radical, activist ideology.”

In the days after the report was released, historians rallied around the museum, Smithsonian leadership criticized the report, and visitors – including some supporters of President Donald Trump – told USA TODAY they saw little evidence of a radical agenda at the museum.

The 162-page report, released July 4 by the White House Domestic Policy Council, is part of the Trump administration’s ongoing review of the Smithsonian, which includes 21 museums and the National Zoo.

The report accuses the museum of overemphasizing such themes as racism and inequality and says its leaders steered from historical scholarship toward social justice advocacy.

It also argues that the museum’s exhibits fail to sufficiently highlight American achievements and instead “teach disdain and inspire disgust of our great country.”

The Smithsonian Institution has not publicly addressed the claims, but in an email obtained by USA TODAY, Smithsonian Secretary Lonnie Bunch told staff the report was “not a fair characterization of the work and totality” of the American history museum.

More than a dozen people who visited the museum on July 9 said it gave a fair and nuanced portrayal of the country.

Meanwhile, the Organization of American Historians, the nation’s largest group of U.S. history scholars, backed the Smithsonian and condemned the report as an attempt to “turn back the clock.”

The White House has stood behind the report. In a statement, Vince Haley, director of the White House Domestic Policy Council, said: “No American wants the Smithsonian’s National Museum of American History to be a system of ideological activism. Unfortunately, the report demonstrates that is exactly what the Smithsonian’s flagship museum has become.”

demning the report as “part of an ongoing and multi-pronged assault by the Trump administration against accurate and evidence-based history in American public life.”

Suse Anderson, program head of museum studies at George Washington University, said the report lacks merit and that the authors “cherry picked a handful of examples that seek to paint the museum’s normal and legitimate practices as nefarious and inappropriate.”

The museum is a leader in its field, Anderson said, and the report is another front in the administration’s larger effort to “undermine the museum field’s independence and its mission to tell diverse, inclusive stories.”

Dean Sobel, museum studies professor at the University of Denver, said he’s “extremely concerned” about the administration interfering with the work of curators and academics rooted in sound research and scholarship.

The White House report is “not grounded in an understanding of what museums really do,” Sobel said. “We don’t tell stories simply, we tell them with all their complexities.”

Founded in 1846, the Smithsonian is a public-private partnership established by Congress. It’s not governed by the executive branch but rather a 17-member Board of Regents that includes Vice President JD Vance, Supreme Court Chief Justice John Roberts, six members of Congress and nine members of the public.

But while Trump cannot direct the Smithsonian as he would an executive-branch agency, he has shown a willingness to exert an enormous amount of pressure to overhaul the institution.

The White House has ordered a review of exhibits and public-facing materials and has publicly urged the institution to make changes. In an executive order, Trump called on Vance to work with Congress to prohibit spending on programs that “degrade shared American values, divide Americans by race or promote ideologies inconsistent with federal law.”

Last year, Kim Sajet stepped down from her role directing the National Portrait Gallery after Trump said he fired her for being “a highly partisan person, and a strong supporter of DEI.” Before Sajet stepped down, the Smithsonian released a statement asserting that only its secretary and board can make such decisions, not the president.

“All personnel decisions are made by and subject to the direction of the secretary, with oversight by the board,” the institution said at the time. Nevertheless, Sajet opted to step aside, saying the move was in the best interest of the institution.

But despite intense pressure from the White House, no large-scale changes to museum exhibits or placards have occurred. In July 2025, the National Museum of American History removed references to Trump from an exhibit on presidential impeachment but later restored them, though with some slight changes to the text.

White House report centers on American history museum

Since returning to office, Trump has sought has sought to reshape cultural institutions to his liking. Last year, Trump signed an executive order directing the Smithsonian to remove what he called “divisive, race-centered ideology.” He then ordered a comprehensive review of the institution and effectively forced out the director of one of its flagship museums, citing her support for diversity, equity and inclusion initiatives and what he called her partisan views.

The new report from the White House centers on the National Museum of American History and says it overemphasizes themes of racism, oppression and inequality. It accuses the museum of framing the Pilgrims as colonizers, Thanksgiving as a day of mourning, and the European settlement of America as a “profound unsettling.”

The report argues that the museum downplays America’s founding, noting the absence of major exhibits devoted to the founding fathers or key events of the American Revolution.

It further criticizes the museum’s programs and exhibits addressing race, immigration and gender identity, contending they prioritize advocacy over traditional historical interpretation.

“Smithsonian Institution, and the National Museum of American History in particular, under its current leadership and current interpretive ideology, cannot be trusted to tell America’s story honestly and in a way that is inspiring, unifying, and worthy of our great republic,” the report concludes.

The Smithsonian Institution has not directly responded to the White House’s allegations.

In his email to Smithsonian staff, Bunch said the institution’s work is “driven by scholarship, accuracy, and an uncompromising commitment to telling the fullness of America’s story.”

He added that the Smithsonian will remain steadfast in its commitment to “nonpartisanship, independence, accuracy, and integrity.”

What are historians saying?

The Organization of American Historians issued a scathing statement con-



Visitors walk through an exhibit, “American Democracy: A Great Leap of Faith,” at the Smithsonian National Museum of American History in Washington, DC, in 2025. ELIZABETH FRANTZ/REUTERS

“This is American history, whether you like it or not,” said Joey Richardson, 67, a retired paper mill worker from Texas. He toured the museum while on a trip with his grandson, who is attending a youth leadership conference hosted by the conservative Turning Point USA.

Rebecca Thapa, a sixth grade teacher from Tulsa, Oklahoma, said the report’s claims are “not anywhere close to reality.” She said she finds it “disheartening” that the White House described the museum’s exhibits and programming as skewed and dishonest. “Everything we saw was really positive.”

Wendy Kiesman, 53, of Wells, Maine, said she would like to have seen a larger emphasis placed on the founding fathers’ accomplishments, echoing a top complaint in the report. But she also said she wouldn’t scale back any descriptions about Alexander Hamilton and Benjamin Franklin owning slaves, which were criticized by the White House. “We need to learn from our his-

tory,” said Kiesman, a self-described Trump supporter. “I don’t think I would change that aspect of it.”

Walking out of the museum, George Jones, 47, said he felt proud of his nation’s history. He especially enjoyed the museum’s culture wing, which highlights American achievements in film and music with cultural artifacts including Dorothy’s ruby slippers from “The Wizard of Oz” and Archie Bunker’s chair from the 1970s sitcom “All in the Family.”

Jones, who visited the museum with his teenage son, said the exhibits describing darker periods in American history such as the transatlantic slave trade and the forced displacement of Native Americans gave him perspective on how much progress the country has made since its founding 250 years ago.

“In many ways, we are a country that moved past those things,” he said. “We still have struggles, but slavery ended and that should be celebrated.”

Contributing: Thao Nguyen

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Tates face new claims of rape and choking

Brothers are fighting U.K. extradition request

Kim Hjelmgard
and Nick Penzenstadler
USA TODAY

Newly unsealed court documents revealed violent allegations of rape, choking and hitting women against divisive internet personalities Andrew and Tristan Tate.

The social media influencers remain in custody in Florida as they challenge an extradition request from the United Kingdom, where the brothers are accused of sexual and physical abuse, including rape and sex trafficking. They deny all the allegations and their attorney has claimed, without offering supporting details, that the arrests were politically motivated.

The federal filings, unsealed late on July 20, detail complaints made by three women to British officials against both brothers. Two of the women – one who met Andrew Tate, 39, through a webcam business and another who met him on a dating app – accused him of rape and assault in incidents in the U.K. dating to 2014 and 2015. Another woman accused Tristan Tate, 38, of rape and assault during a long-term relationship that began in 2012. The women alleged they often were choked by the brothers, sometimes to the point of passing out, before being raped.

One of the alleged victims said she had consensual sex with Andrew Tate in 2014 after meeting him on a dating app. Later, when he visited her home in Manchester, England, he pinned her down while they had sex. She alleged she was not able to breathe and “afraid he would not stop and was going to kill her,” according to the filings.

One woman says Andrew Tate put her in “a chokehold, which prevented her from breathing and caused her to lose consciousness.” Another woman alleged Tristan Tate would choke her unconscious, then slap her awake.

The women were not named in the court documents.

U.S. Magistrate Lauren Louis set a hearing for July 27 to consider whether the prominent members of the so-called manosphere meet the conditions for ex-



Tristan and Andrew Tate deliver a statement to the media in Romania, near Bucharest, on March 22, 2025. INQUAM PHOTOS/EDUARD VINATORU/VIA REUTERS

tradition after they appeared in a federal court in Miami on July 20. If they do, Secretary of State Marco Rubio has the power to halt any such extradition. They are not eligible for bail.

The State Department did not respond to a request for comment about Rubio’s potential intervention.

Records show Andrew and Tristan Tate were being held at the Federal Detention Center in downtown Miami.

The Tate brothers promote fitness, lifestyle and get-rich-quick advice alongside a toxic blend of misogynistic and anti-feminist rhetoric while insisting they respect women. Their exhortations to get rich quick, drive fast cars and aggressively treat women as property are followed by millions of people online.

Joseph McBride, a defense attorney who represents the Tate brothers, told reporters outside the courthouse in Miami that the case “feels political” and he vowed to fight against the extradition request.

“They’ve never done nothing wrong,” McBride said. “They shouldn’t be extradited for crimes they did not commit.”

Without offering further explanation, McBride claimed that the Tates’ case was closely connected to former British Prime Minister Keir Starmer’s recent resignation. He also argued that the brothers’ arrest shortly after meeting “friends in Washington, DC,” was not merely coincidental.

Andrew Tate has been a highly vocal supporter of President Donald Trump.

ing actual bodily harm and 19 additional charges for offenses relating to indecent images of a child and extreme pornography.

Tristan Tate is being prosecuted on one count of sexual assault, two counts of rape and three counts of arranging or facilitating trafficking for sexual exploitation.

The fresh charges were announced by the United Kingdom’s Crown Prosecution Service on July 18 shortly before U.S. Marshals arrested the brothers.

Those charges are in addition to 21 earlier charges in the U.K. following allegations made by four British women against Andrew Tate, a dual U.S.-British citizen who was living in England and in the early stages of launching an adult webcam business, from 2013 to 2015.

Tristan Tate is not a defendant in the earlier cases brought by the four British women, which include rape and human trafficking allegations that Andrew Tate also denies.

The total number of charges against both brothers now stands at 59.

In one of the earlier cases against Andrew Tate, unsealed in British court documents in April 2025, two women accused him of strangling them so often and with such force that they developed red spots in their eyes, indicating bleeding capillaries. One of the women who alleged she was strangled also accused him of rape, whipping her with a belt and pointing a gun in her face.

“I’m just debating whether to rape you or not,” Andrew Tate said to one of the women who brought the earlier suit, according to the court filings.

Tate had his hand around her neck as he posed the question. He later raped her, the filings say. Tate denied all the allegations in that case and all the others, according to court filings.

British prosecutors say they have witness statements, electronic messages and photographs that corroborate the allegations against the Tates.

In a 2019 YouTube video, cited in the earlier filings as evidence of Andrew Tate’s behavior toward women, he tells his viewers, “choke her so she can barely (expletive) breathe. Tell her she’s yours forever. They’re going to believe it. You can program them.”

Contributing: Bart Jansen, Will Carless.

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EXHIBIT F

CAFA Notice

**EAG Gulf Coast, LLC**

8550 United Plaza Blvd.

Suite 1001

Baton Rouge, LA 70809

T 225.922.4600

F 225.922.4611

www.eisneramper.comVIA U.S. MAIL

Date: April 17, 2026

To: All "Appropriate" Federal and State Officials Per 28 U.S.C. § 1715

Re: CAFA Notice for the proposed Settlement in the *In re: Stiizy Inc., Data Breach Security Litigation*: 2:25-cv-00490-GW-SSC, pending in the United States District Court for the Central District of California.

Pursuant to Section 3 of the Class Action Fairness Act of 2005 ("CAFA"), 28 U.S.C. § 1715, Defendant Stiizy Inc. hereby notifies you of the proposed settlement filed on April 09, 2026 in the above-captioned action (the "Action"), currently pending in the United States District Court for the Central District of California, (the "Court"). Defendant denies all material allegations in the Consolidated Class Action Complaint, and all prior complaints, denies wrongdoing of any kind, denies liability on any claims asserted, and further specifically denies liability for all statutory, common law, and contract-related claims alleging it had inadequate data security or failed to properly protect any personal data or respond appropriately to the Incident.

Defendant addresses the eight items required by 28 U.S.C. § 1715(b) below, and all exhibits are available for review on the enclosed CD:

1. 28 U.S.C. § 1715(b)(1) – a copy of the complaint and any materials filed with the complaint and any amended complaints.

The Class Action Complaint is available as **Exhibit A**, the Consolidated Class Action Complaint is available as **Exhibit B**.

2. 28 U.S.C. § 1715(b)(2) – notice of any scheduled judicial hearing in the class action.

A hearing on Plaintiffs' Unopposed Motion for Preliminary Approval is scheduled for May 11, 2026 at 8:30am (Pacific Time) before the Honorable George H. Wu, United States District Court Judge for the Central District of California. There are no other scheduled judicial hearings at this time.

3. 28 U.S.C. § 1715(b)(3) – any proposed or final notification to class members.

Copies of the proposed E-mail Notice, Short-Form Notice and Long-Form notice are available as **Exhibits C, D, and E**, respectively. These include information about how to opt out of the class and not be bound by the settlement in this case.

EAG Gulf Coast, LLC is a subsidiary of Eisner Advisory Group LLC. "EisnerAmper" is the brand name under which EisnerAmper LLP and Eisner Advisory Group LLC and its subsidiary entities provide professional services. EisnerAmper LLP and Eisner Advisory Group LLC are independently owned firms that practice in an alternative practice structure in accordance with the AICPA Code of Professional Conduct and applicable law, regulations and professional standards. EisnerAmper LLP is a licensed CPA firm that provides attest services, and Eisner Advisory Group LLC and its subsidiary entities provide tax and business consulting services. Eisner Advisory Group LLC and its subsidiary entities are not licensed CPA firms.

**EAG Gulf Coast, LLC**

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Baton Rouge, LA 70809

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4. 28 U.S.C. § 1715(b)(4) – any proposed or final class action settlement.

The Settlement Agreement is available as **Exhibit F**.

5. 28 U.S.C. § 1715(b)(5) – any settlement or other agreement contemporaneously made between class counsel and counsel for defendant.

There is no settlement or other agreement contemporaneously made between class counsel and counsel for defendant.

6. 28 U.S.C. § 1715(b)(6) – any final judgment or notice of dismissal.

The Court has not entered a final judgment.

7. 28 U.S.C. § 1715(b)(7) – (A) If feasible, the names of class members who reside in each State and the estimated proportionate share of the claims of such members to the entire settlement to that State’s appropriate State official; or (B) if the provision of the information under subparagraph (A) is not feasible, a reasonable estimate of the number of class members residing in each State and the estimated proportionate share of the claims of such members to the entire settlement.

A count of the number of Settlement Class Members by state is available as **Exhibit G**. The Settlement provides for a \$2,950,000 Settlement Fund. Settlement Class Members may submit a claim for reimbursement for Documented Losses of up to \$7,500 or a pro rata cash fund payment, subject to a pro rata increase or decrease based on total claims filed. In addition, Settlement Class Members may elect to enroll in two years of Credit Monitoring and Insurance Services.

8. 28 U.S.C. § 1715(b)(8) – any written judicial opinion relating to the materials described in 28 U.S.C. § 1715(b) subparagraphs (3) through (6).

The Court has not issued any relevant opinions or orders at this time.

If you have any questions about this notice, the Action, or the enclosed materials, please contact the undersigned below.

Sincerely,

A handwritten signature in black ink that reads "Ryan Aldridge".

Ryan Aldridge

Ryan.Aldridge@eisneramper.com

Eisner Advisory Group, LLC (“EAG”) as *Settlement Administrator*



CAFA Notice Service List							
In re: STIIIZY Inc. Data Breach Security Litigation, Case No. 2:25-cv-00490-GW-SSC (United States District Court, Central District of California)							
Name1	Name2	Address1	Address2	Address3	City	State	Zip
Office of the Attorney General		1031 W. 4th Avenue, Suite 200			Anchorage	AK	99501-1994
Office of the Attorney General		501 Washington Avenue	PO Box 300152		Montgomery	AL	36104
Office of the Attorney General		323 Center Street, Suite 200			Little Rock	AR	72201-2610
Office of the Attorney General		2005 N Central Ave			Phoenix	AZ	85004-2926
Office of the Attorney General	CAFA Coordinator, Consumer Law Section	455 Golden Gate Avenue, Suite 11000			San Francisco	CA	94102
Office of the Attorney General		Ralph L. Carr Colorado Judicial Center	1300 Broadway, 10th Floor		Denver	CO	80203
Office of the Attorney General		165 Capitol Avenue			Hartford	CT	06106
Office of the Attorney General		441 4th Street NW, Suite 1100S			Washington	DC	20001
United States Office of the Attorney General	US Department of Justice	950 Pennsylvania Ave, NW			Washington	DC	20530-0001
Office of the Attorney General		820 North French Street	6th Floor		Wilmington	DE	19801
Office of the Attorney General		The Capitol	PL-01		Tallahassee	FL	32399-1050
Office of the Attorney General		40 Capitol Square SW			Atlanta	GA	30334
Department of the Attorney General		425 Queen Street			Honolulu	HI	96813
Office of the Attorney General		Hoover State Office Building	1305 East Walnut Street		Des Moines	IA	50319
Office of the Attorney General		954 West Jefferson Street, 2nd floor	PO Box 83720		Boise	ID	83720-0010
Office of the Attorney General		100 West Randolph Street			Chicago	IL	60601
Office of the Attorney General		Indiana Government Center South	302 West Washington Street, 5th Floor		Indianapolis	IN	46204
Office of the Attorney General		120 SW 10th Ave, 2nd Floor			Topeka	KS	66612-1597
Office of the Attorney General		700 Capitol Avenue, Suite 118			Frankfort	KY	40601-3449
Office of the Attorney General		PO Box 94005			Baton Rouge	LA	70804
Office of the Attorney General	ATTN: CAFA Coordinator/General Counsel's Office	One Ashburton Place			Boston	MA	02108
Office of the Attorney General		200 St. Paul Place			Baltimore	MD	21202
Office of the Attorney General		6 State House Station			Augusta	ME	04333
Office of the Attorney General		G. Mennen Williams Building	525 West Ottawa Street	PO Box 30212	Lansing	MI	48909
Office of the Attorney General		445 Minnesota Street, Suite 1400			St Paul	MN	55101-2131
Office of the Attorney General		Supreme Court Building	207 West High Street		Jefferson City	MO	65102
Office of the Attorney General		Walter Sillers Building	550 High Street, Suite 11		Jackson	MS	39201
Office of the Attorney General		Justice Building Third Floor	215 North Sanders		Helena	MT	59601
Office of the Attorney General	ATTN: Consumer Protection	114 West Edenton Street			Raleigh	NC	27603
Office of the Attorney General		State Capitol	600 East Boulevard Avenue, Dept. 125		Bismarck	ND	58505
Office of the Attorney General		2115 State Capitol	PO Box 98920		Lincoln	NE	68509
Office of the Attorney General		33 Capitol Street			Concord	NH	03301
Office of the Attorney General		RJ Hughes Justice Complex	25 Market Street	PO BOX 080	Trenton	NJ	08625-0080
Office of the Attorney General	ATTN: Farrah Diaz, Paralegal	201 3rd St NW, Suite 300			Albuquerque	NM	87102
Office of the Attorney General		Old Supreme Court Building	100 North Carson Street		Carson City	NV	89701
Office of the Attorney General		The Capitol			Albany	NY	12224-0341
Office of the Attorney General		State Office Tower	30 East Broad Street, 14th Floor		Columbus	OH	43215
Office of the Attorney General		313 NE 21st Street			Oklahoma City	OK	73105
Office of the Attorney General	Oregon Department of Justice	1162 Court Street NE			Salem	OR	97301-4096
Office of the Attorney General		16th Floor, Strawberry Square			Harrisburg	PA	17120
Office of the Attorney General		PO Box 9020192			San Juan	PR	00902-0192
Office of the Attorney General	ATTN: Lisa Pinsonneault/CAFA Notice	150 South Main Street			Providence	RI	02903
Office of the Attorney General		PO Box 11549			Columbia	SC	29211-1549
Office of the Attorney General		1302 E. Highway 14, Suite 1			Pierre	SD	57501-8501
Office of the Attorney General and Reporter		PO Box 20207			Nashville	TN	37202
Office of the Attorney General		Capitol Station	PO Box 12548		Austin	TX	78711-2548
Office of the Attorney General		Utah State Capitol Complex	350 North State Street, Suite 230		Salt Lake City	UT	84114-2320
Office of the Attorney General		202 North Ninth Street			Richmond	VA	23219
Office of the Attorney General		109 State Street			Montpelier	VT	05609
Office of the Attorney General		1125 Washington Street SE	PO Box 40100		Olympia	WA	98504-0100
Office of the Attorney General	Wisconsin Department of Justice	PO Box 7857			Madison	WI	53707-7857
Office of the Attorney General		State Capitol	Building 1, Room E-26		Charleston	WV	25305
Office of the Attorney General		Kendrick Building	2320 Capital Avenue		Cheyenne	WY	82002

EXHIBIT G

Exclusions

Exclusion Requests				
<i>In Re: STIIIZY Inc. Data Breach Security Litigation, Case No. 2:25-cv-00490-GW-SSC</i>				
Count	First Name	Last Name	State	Submission Date
1	Michael	Spielvogel	GA	7/24/2026
2	Anthony	Zabielski	CT	7/26/2026