

## LEGAL NOTICE

***Robert W. Clough, II v. Revenue Frontier, LLC, et al.,***  
**No. 1:17-cv-00411-PB (D. NH)**

A class action settlement has been proposed in this lawsuit pending in the U.S. District Court for the District of New Hampshire (“Court”).

This case claims that Supreme Data Connections, LLC and its principal, William Adomanis, violated the Telephone Consumer Protection Act by causing text messages to be sent to cell phones advertising tax relief services using an automatic telephone dialing system, and that Revenue Frontier is vicariously liable for the calls. Defendants deny they did anything wrong.

Who Is Included? If you received this notice, records in the case indicate that you are a member of the Settlement Class, which includes: “(1) All persons in the United States who are the users or subscribers of the approximately 18,937 cellular telephones identified in Anya Verkhovskaya’s report, [the expert witness retained by plaintiff] (2) to which cellular telephone numbers a text message was sent (3) using the SDC Messaging Application, employing the Sendroid software (4) within four years of the filing of the complaint.”

Please do not call the Judge or the Clerk of the Court.  
They cannot give you advice on your options.

**PLEASE READ THIS NOTICE**

Tax Relief Text TCPA Settlement  
Settlement Administrator  
c/o A.B. Data, Ltd.  
P.O. Box 173026  
Milwaukee, WI 53217

First-Class  
Mail  
US Postage  
Paid  
Permit #\_\_

[NoticeID Barcode]

Postal Service: Please do not mark barcode

NoticeID #####

«First1» «Last1»

«CO»

«Addr2»

«Addr1»

«City», «St» «Zip»

«Country»

**Summary of the Settlement:** Revenue Frontier and W4, LLC have agreed to establish a Settlement Fund of \$2,100,000 to pay Class Members (including certain members who make valid and timely claims); pay any incentive award to the class representative, Mr. Clough; pay attorneys' fees and costs; and pay settlement notice and administration costs. The Court has preliminarily approved this Settlement. Plaintiff will request up to \$25,000 as an incentive award, and up to \$700,000 in attorneys' fees, plus costs of \$50,894.49. Any remaining monies from uncashed settlement checks may be redistributed or paid to the National Consumer Law Center or other non-profit organization. This is a summary notice only; additional details can be found at [www.TaxDebtTextTCPA.com](http://www.TaxDebtTextTCPA.com) or by calling 1-877-829-4146.

**Can I Get Money from the Settlement?** Yes, if you received this notice by postal mail, you do not need to do anything to receive a *pro rata* cash award, the amount of which depends on how many people make approved claims. Class Members who received texts on more than one cell phone may submit one claim per cell number. Class Counsel estimate that the amount of the cash award may be about \$50 to \$60. If you did not receive this notice by postal mail, then you need to complete a claim form available at [www.TaxDebtTextTCPA.com](http://www.TaxDebtTextTCPA.com) so that the class action administrator can determine whether you are eligible to receive a cash payment.

**Do I Have a Lawyer?** Yes. The Court appointed attorneys with Phillips Law Office, PLLC, Broderick Law, P.C., The Law Office of Matthew P. McCue, and CW Law Group, P.C. as Class Counsel. The lawyers will be paid from the Settlement Fund. You may enter an appearance in the case through your own attorney if you so desire.

**What Should I Do?** Class Members have three options: **(1) Do Nothing** If you received this notice via mail, you are automatically entitled to a share of the Settlement Fund and a check will be mailed to you by the Settlement Administrator. If the Settlement is approved, you will not have the right to sue separately for damages of \$500 per text, or \$1,500 per text made willfully. **(2) Remain a Class Member but object** to the Settlement. Instructions for objecting are available at [www.TaxDebtTextTCPA.com](http://www.TaxDebtTextTCPA.com). Objections and supporting documents must be sent to Class Counsel and Defense Counsel and filed with the Court by August 10, 2020. You may pay for and be represented by a lawyer who may send the objection for you. **(3) Exclude yourself** from the Settlement Class by mailing a request to the Settlement Administrator (not the Court). You must state in writing your name, address, the cell number at which Supreme Data or Mr. Adomanis texted you, and that you want to be excluded from this Settlement. Exclusions must be signed and postmarked no later than August 10, 2020.

**Scheduled Hearing:** The judge scheduled a hearing for September 9, 2020, at 2:00 p.m., in Courtroom 4 of the U.S. District Court, District of New Hampshire, 55 Pleasant St., Concord, NH 03301, regarding whether to give final approval to the Settlement, including the amounts of any attorneys' fees, costs, and Class Representative award. The hearing may be changed without notice. **It is not necessary for you to appear at this hearing, but you may attend at your own expense.**

**For more information:** Visit: [www.TaxDebtTextTCPA.com](http://www.TaxDebtTextTCPA.com); Call: 1-877-829-4146; or write to: Tax Relief Text TCPA Settlement, Settlement Administrator, c/o A.B. Data, Ltd., P.O. Box 173026, Milwaukee, WI 53217.