NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Dinkel, et al., v. American Consumer Credit Counseling, Inc.
Case No. 2581CV02933
Superior Court of Middlesex County, Massachusetts

IF YOU WERE SENT NOTICE THAT YOUR PRIVATE INFORMATION MAY HAVE BEEN IMPACTED IN THE JANUARY 2025 AMERICAN CONSUMER CREDIT COUNSELING, INC. DATA INCIDENT,
A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS, AND ENTITLE YOU TO SETTLEMENT BENEFITS.

A court has authorized this notice. This is not a solicitation from a lawyer.
You are not being sued.
Please read this Notice carefully and completely.

- A Settlement has been reached with American Consumer Credit Counseling, Inc. ("ACCC" or "Defendant") in a proposed class action lawsuit. This case involves a January 2025 cybersecurity incident in which a criminal third party gained unauthorized access to certain of Defendant's employee email accounts (the "Data Incident"). The PII of certain individuals may have been impacted in the Data Incident. This information may have included name; Social Security number; driver's license number; financial account number; and/or payment card information.

- The lawsuit is called *Dinkel, et al., v. American Consumer Credit Counseling, Inc.*, Case No. 2581CV02933. It is pending in the Superior Court of Middlesex County, Massachusetts (the "Litigation").

- ACCC denies that it did anything wrong, and denies all claims, allegations, and liability. The Court has not made a determination that ACCC did anything wrong.

- The parties have agreed to settle the lawsuit (the "Settlement") to avoid the costs and risks, disruptions, and uncertainties of continuing the Litigation.

- You have been identified as a Settlement Class Member, and you may be entitled to benefits under the Settlement.

- Your rights are affected whether you act or don't act. ***Please read this Notice carefully and completely.***

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	The only way to receive benefits or payments from this Settlement is by submitting a valid and timely Claim Form. The fastest way to submit your Claim Form is online at www.ACCCSettlement.com. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator. You may also call or email the Settlement Administrator to receive a paper copy of the Claim Form.	**Submitted, emailed, or postmarked by September 16, 2026**
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	You may object to it by writing to the Court about why you don't like the Settlement. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you may also file a claim for Settlement Benefits.	**August 17, 2026**
DO NOTHING	You are automatically part of the Settlement. If you do nothing, you will not receive benefits or payments from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant or the Released Parties related to the Released Claims.	No Deadline

- These rights and options—**and the deadlines to exercise them—**are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement.

WHAT THIS NOTICE CONTAINS

Basic Information

1. Why was this Notice issued?

The Superior Court of Middlesex County, Massachusetts, authorized this Notice. You have a right to know about the proposed Settlement of this class action lawsuit, and about all of your options, before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is called *Dinkel, et al., v. American Consumer Credit Counseling, Inc.*, Case No. 2581CV02933. It is pending in the Superior Court of Middlesex County, Massachusetts. The people that filed this lawsuit are called the "Plaintiffs" (or "Class Representatives") and the company they sued, American Consumer Credit Counseling, Inc., is called the "Defendant."

2. What is this lawsuit about?

This lawsuit alleges that, in January 2025, Defendant became aware of a cybersecurity incident involving a criminal third party gaining unauthorized access to certain of Defendant's employee email accounts. These files may have contained personal information such as name; Social Security number; driver's license number; financial account number; and/or payment card information.

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals are called the "Plaintiffs" or "Class Representatives." Together, the people included in the class action are called a "Class" or "Class Members." One court resolves the lawsuit for all Class Members. In this Settlement, the Class Representatives are Veronica Hicks and Justin Dinkel. Everyone included in this Action are the Class Members.

4. Why is there a Settlement?

The Court did not decide whether the Plaintiffs or the Defendant are right. Both sides have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Class Members to receive benefits from the Settlement. The Plaintiffs and their attorneys think the Settlement is best for all Class Members.

Who is in the Settlement?

5. Who is included in the Settlement?

The court has defined the Class this way: "All individuals residing in the United States whose PII was potentially compromised in the Data Incident experienced by Defendant, including all those who received notice of the Data Incident." In this sentence, PII means Personally Identifiable Information.

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) Defendant; (2) Defendant's affiliates, parents, subsidiaries; (3) any entity in which Defendant has a controlling interest; (4) any of Defendant's officers or directors; (5) any successors; (6) any judge who adjudicates this case, including their staff and immediate family; and (7) any person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding or abetting the criminal activity occurrence of the Data Incident, or who pleads *nolo contendere* to any such charge.

If you are not sure whether you are a Class Member, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@ACCCSettlement.com
- Call toll free, 24/7: (833) 421-7260
- By mail: ACCC Data Incident Settlement
  c/o Settlement Administrator
  P.O. Box 25226
  Santa Ana, CA 92799

You may also view the Settlement Agreement at www.ACCCSettlement.com.

The Settlement Benefits

7. What does the Settlement provide?

ACCC has agreed to pay for a number of different benefits, as described below. All Class Members may enroll in three years of **Credit Monitoring** services from one bureau and payments from **one** of two **cash payment** categories:

Category 1: Select one or more of the following benefits:		**Category 2**: Alternative Cash Payment
• Documented Out-of-Pocket Losses • Compensation for Lost Time	***OR***	• Receive a one-time $45.00 cash payment

Credit Monitoring. All Class Members are eligible to enroll in three years of CyEx Financial Shield Complete. This comprehensive service comes with $1 million of financial fraud insurance, and includes monitoring for:

- fraud or identity theft
- unauthorized financial transactions
- high-risk financial transactions

If anything suspicious happens, you will be able to talk to a fraud resolution agent to help fix any problems.

CASH PAYMENTS. You may claim payments from *either* Category 1 or Category 2.

Category 1

Documented Out-of-Pocket Losses. If you incurred actual, documented out-of-pocket losses traceable to the Data Incident, you may submit a claim, not to exceed **$3,500.00**. The losses must have occurred between January 27, 2025, and September 16, 2026.

This benefit covers out-of-pocket expenses like:

- losses because of identity theft or fraud
- fees for credit reports, credit monitoring, or freezing and unfreezing your credit
- cost to replace your IDs
- postage to contact banks by mail

You need to send documented proof, like bank statements or receipts, to show how much you spent or lost. You can also send notes or papers you made yourself to explain or support other proof, but those notes or papers alone are not enough to make a valid claim. Your proof or notes should show that your expenses were because of the Data Incident.

You cannot claim a payment for expenses that have already been reimbursed by a third party.

Compensation for Lost Time. Class Members who spent time responding to the Data Incident may claim up to four hours, at $20.00 per hour, for a maximum of **$80.00**.

You must have spent the time on tasks related to the Data Incident. Some examples include things like:

- changing your passwords
- investigating suspicious activity in your accounts
- researching the Data Incident

You must briefly describe how you spent this time.

Category 2

Alternative Cash Payment. Instead of the benefits in Option A, you may claim a one-time cash payment for **$45.00**.

You do not have to provide any proof or explanation to claim this payment.

If you have questions about these benefits, you can ask for free help any time by contacting the Settlement Administrator at:

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- Call toll free, 24/7: (833) 421-7260
- By mail: ACCC Data Incident Settlement
  c/o Settlement Administrator
  P.O. Box 25226
  Santa Ana, CA 92799

8. What claims am I releasing if I stay in the Class?

If you stay in the class, you won't be able to be part of any other lawsuit against Defendant or the Released Parties for any of the Released Claims. The "Releases" section of the Settlement Agreement (Section VIII) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at www.ACCCSettlement.com.

Submitting a Claim Form for a Settlement Benefits

9. How do I submit a claim for a Settlement benefit?

The fastest way to submit your Claim Form is online at www.ACCCSettlement.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

ACCC Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, (833) 421-7260, by email info@ACCCSettlement.com, or by U.S. mail at the address above.

10. Are there any important Settlement payment deadlines?

If you are submitting a Claim Form online, you must do so by **September 16, 2026**. If you are submitting a claim by U.S. mail, the completed and signed Claim Form, including supporting documentation, must be postmarked no later than **September 16, 2026**.

11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on October 8, 2026 (***see* Question 18)**. If the Court approves the Settlement, there may be appeals. We do not know if appeals will be filed, or how long it will take to resolve them if they are filed.

Settlement payments will be distributed if the Court grants final approval, and after any appeals are resolved.

The Lawyers Representing You

12. Do I have a lawyer in the case?

Yes, the Court has appointed attorney Casondra Turner of Milberg, PLLC, to represent you and other Class Members ("Class Counsel").

13. Should I get my own lawyer?

You will not be charged for Class Counsel's services. If you want your own lawyer, you may hire one at your expense.

14. How will Class Counsel be paid?

Class Counsel will ask the court to approve $225,000.00 as reasonable attorney's fees and costs of litigation. If approved, these fees and costs will be paid by Defendant.

Class Counsel will also ask for Service Award payments of $4,000.00 for each of the Class Representatives, not to exceed $8,000.00. Any approved Service Awards will also be paid by Defendant.

Objecting to the Settlement

15. How do I tell the Court if I like or do not like the Settlement?

If you are a Class Member and do not like part or all of the Settlement, you can object to it. Objecting means telling the Court your reasons for why you think the Court should not approve the Settlement. The Court will consider your views.

You must provide the following information for the Court to consider your objection:

(1) the name of the Litigation: *Dinkel, et al., v. American Consumer Credit Counseling, Inc.,* Case No. 2581CV02933, pending in the Superior Court of Middlesex County, Massachusetts;

(2) your full name, mailing address, telephone number, and email address;

(3) information that proves that you are a Class Member (such as a notice you have received);

(4) a clear description of all the reasons you object; include any legal support, such as documents, you may have for your objection;

(5) if you have hired your own lawyer to represent you for this objection, provide their name, bar number, and contact information;

(6) if you have hired your own lawyers, also provide their background and experience, how much they expect to charge, and how they calculated that number;

(7) if you or your lawyer have objected in any other cases in the past five years, list the names, courts, and civil action numbers for each of those cases;

(8) whether or not you or your lawyer would like to speak at the Final Approval Hearing;

(9) if you plan on calling witnesses or submitting documents at the Final Approval Hearing, provide a full list of both; and

(10) your signature (or, if you have hired your own lawyer, your lawyer's signature).

For your objection to be valid, it must meet each of these requirements.

To be considered by the Court, you must file your complete objection with the Clerk of Court by **August 17, 2026**. You must also send a copy of the objection to the Settlement Administrator, Class Counsel, and counsel for Defendants.

Clerk of the Court	Settlement Administrator
Clerk of the Court 200 Trade Center Dr. Woburn, MA 01801	ACCC Data Incident Settlement c/o Settlement Administrator P.O. Box 25226 Santa Ana, CA 92799

Class Counsel	Counsel for Defendants
Casondra Turner **MILBERG, PLLC** 260 Peachtree Street NW, Suite 2200 Atlanta, GA 30303	Sean B. Solis **BAKER & HOSTETLER LLP** 1801 California Street, Suite 4400 Denver, CO 80202 James H. Rollinson **BAKER & HOSTETLER, LLP** Key Tower 127 Public Square, Suite 2000 Cleveland, OH 44114

The Final Approval Hearing

16. When is the Final Approval Hearing?

The Court will hold a final approval hearing on **October 8, 2026 at 2:00 p.m. Eastern Time** by video teleconference via Zoom. The Zoom link will be posted on the settlement website.

At the final approval hearing, the Court will decide whether to approve the Settlement. The Court will also decide whether to approve Class Counsel's request for attorneys' fees and costs and whether to award Service Award payments to the Class Representatives. The Court will also consider any objections to the Settlement.

If you are a Class Member, you or your lawyer may ask permission to speak at the hearing at your own cost (***See* Question 16**).

The location, date, or time of this hearing may change without further notice. Please check www.ACCCSettlement.com for updates.

17. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish, but you do not have to.

If you file an objection, you do not have to come to the Final Approval Hearing to talk about it; the Court will consider it as long as it was filed on time. You may also pay your own lawyer to attend, but you do not have to.

If I Do Nothing

18. What happens if I do nothing at all?

If you do nothing, you will not receive any benefits from this Settlement.

You will also give up the rights described in **Question 8**.

Getting More Information

19. How do I get more information?

This Notice is a summary of the proposed Settlement. The full Settlement Agreement and other related documents are available at the Settlement Website, www.ACCCSettlement.com.

If you have additional questions, you can ask for free help any time by contacting the Settlement Administrator at:

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- Call toll free, 24/7: (833) 421-7260
- By mail: ACCC Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, 200 Trade Center Dr., Woburn, MA 01801.

DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING THIS SETTLEMENT