

UNITED STATES DISTRICT COURT,
WESTERN DISTRICT OF WISCONSIN

**If You Received a Text Message from Goldco Direct LLC, You May Be Entitled to a Payment
from a Class Action Settlement**

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

- A Settlement¹ has been reached in a class action lawsuit about whether Goldco Direct LLC (“Defendant”) sent marketing text messages to telephone numbers after being asked to stop in violation of the Telephone Consumer Protection Act (“TCPA”). Defendant denies the allegations and any wrongdoing. The Court has not decided who is right.
- **The Settlement offers payments to Settlement Class Members who file valid Claims.**
- **Your legal rights are affected whether you act or do not act. Read this Notice carefully.**

Summary of Your Legal Rights and Options in this Settlement		Deadline
SUBMIT A CLAIM FORM	If you are a member of the Settlement Class, you must submit a completed Claim Form to receive a payment. If the Court approves the Settlement and it becomes final and effective, and you remain in the Settlement Class, you will receive your payment by check. You can submit a claim online at www.GoldcoTCPASettlement.com.	April 10, 2026
EXCLUDE YOURSELF	You may request to be excluded from the Settlement and, if you do, you will receive no benefits from the Settlement. You can exclude yourself online at www.GoldcoTCPASettlement.com.	February 25, 2026
OBJECT TO THE SETTLEMENT OR ATTEND A HEARING	Write to the Court if you do not like the Settlement. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing.	February 25, 2026
DO NOTHING	You will not receive a payment if you fail to timely submit a completed Claim Form, and you will give up your right to bring your own lawsuit against Defendant about the Claims in this case.	

- 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. If it does, and after any appeals are resolved, benefits will be distributed to those who submit qualifying Claim Forms. Please be patient.

WHAT THIS NOTICE CONTAINS

¹ Capitalized terms herein have the same meanings as those defined in the Settlement Agreement, a copy of which may be found online at the Settlement Website.

**QUESTIONS? CALL (833) 647-8970 OR VISIT
WWW.GOLDCOTCPASETTLEMENT.COM**

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BASIC INFORMATION

1. Why is there a Notice?

A court authorized this Notice because you have a right to know about a proposed Settlement of a class action lawsuit known as *Summerton v. Goldco Direct LLC* in the United States District Court, Western District of Wisconsin, and about all of your options before the Court decides whether to give Final Approval to the Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights.

Hon. William M. Conley a Judge and Hon. Magistrate Judge Anita Marie Boor are overseeing this case. The persons who sued, Plaintiff Jan Summerton is called the “Plaintiff.” Goldco Direct LLC is called the “Defendant”.

2. What is this litigation about?

The lawsuit alleges that Defendant sent more than one marketing text message to Plaintiff’s wireless telephone number within a 12-month period after Plaintiff asked Defendant to stop doing so in violation of the Telephone Consumer Protection Act, and seeks actual and statutory damages under the TCPA on behalf of the named Plaintiff and a class of all individuals in the United States.

Defendant denies each and every allegation of wrongdoing, liability, and damages that were or could have been asserted in the litigation and that the claims in the litigation would be appropriate for class treatment if the litigation were to proceed through trial.

The Plaintiffs’ Complaint, Settlement Agreement, and other case-related documents are posted on the Settlement Website, www.GoldcoTCPASettlement.com. The Settlement resolves the lawsuit. The Court has not decided who is right.

3. What is the TCPA?

The Telephone Consumer Protection Act (commonly referred to as the “TCPA”) is a federal law that restricts the use of marketing related text message calls.

4. Why is this a class action?

In a class action, one person called the “Class Representative” (in this case, Plaintiff) sue on behalf of themselves and other people with similar claims.

All of the people who have claims similar to the Plaintiff are Settlement Class Members, except for those who exclude themselves from the class, among others.

5. Why is there a settlement?

The Court has not found in favor of either Plaintiff or Defendant. Instead, both sides have agreed to a settlement. By agreeing to the Settlement, the parties avoid the costs and uncertainty of a trial, and if the Settlement is approved by the Court, Settlement Class Claimants will receive the benefits described in this Notice. Defendant denies all legal claims in this case. Plaintiff and her lawyers think the proposed Settlement is best for everyone who is affected.

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WHO IS PART OF THE SETTLEMENT?

6. Who is included in the Settlement?

The Settlement includes all persons who received more than one marketing text message on their telephone from Defendant within a 12-month period after having first asked Defendant to stop sending them text messages. Specifically, the Settlement Class is defined as:

All persons in the United States who, during the four years prior to the filing of this case (1) received more than one text message from Defendant or anyone on Defendant's behalf during any 12-month period; (2) after requesting to not receive text messages from Defendant by responding with a "stop" or "unsubscribe" request; (3) whose number was listed on the National Do-Not-Call Registry when the messages were received; and (4) who did not re-opt in to receive text messages prior to receipt of the text messages.

The Settlement Class excludes the following: (1) the trial judge presiding over this case; (2) Defendant, as well as any parent, subsidiary, affiliate, or control person of Defendant, and the officers, directors, agents, servants, or employees of Defendant; (3) any of the Released Parties; (4) the immediate family of any such person(s); and (5) any Settlement Class Member who has timely opted out of this proceeding.

7. What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are in the Settlement Class or have any other questions about the Settlement, visit the Settlement Website at www.GoldcoTCPASettlement.com or call the toll-free number, (833) 647-8970. You also may send questions to the Settlement Administrator at Goldco Direct LLC TCPA Settlement c/o Settlement Administrator, P.O. Box 25226 Santa Ana, CA 92799.

THE SETTLEMENT BENEFITS

8. What does the Settlement provide?

To fully settle and release claims of the Settlement Class Members, Defendant has agreed to pay \$2,000,000 (the "Gross Settlement Fund" or "GSF"). The Gross Settlement Fund will also be used to pay for notice and administration costs of the Settlement, attorneys' fees and expenses incurred by counsel for the Settlement Class, and a service award for Plaintiff. Each Settlement Class Member who submits a timely, valid, correct and verified Claim Form by the Claim Deadline in the manner required by this Agreement, making all the required affirmations and representations, shall be sent a Claim Settlement Check by the Administrator equal to their pro rata share of any funds available from the Gross Settlement Fund after all attorneys' fees and expenses, all Notice and Administration Costs, and any Service Award have been paid. Class Claimants will be sent their Claim Settlement Payments to the address they submitted on their Claim Form within 60 days following the Effective Date.

9. How do I file a Claim?

If you qualify for a payment, you must complete and submit a valid Claim Form. You may download a Claim Form at the Settlement Website, www.GoldcoTCPASettlement.com, or request a Claim Form by calling the Settlement Administrator at the toll-free number below. To be valid, a Claim Form must be completed fully and accurately and submitted timely. One claim is allowed per telephone number.

You must submit a Claim Form by U.S. mail to You also may send questions to the Settlement Administrator at Goldco Direct LLC TCPA Settlement c/o Settlement Administrator, P.O. Box 25226 Santa Ana, CA 92799, through the Settlement Website www.GoldcoTCPASettlement.com, or send it

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by email to info@GoldcoTCPASettlement.com and it must be postmarked by April 10, 2026. The deadline to file a Claim online or by email is 11:59 p.m. PST on April 10, 2026.

Please read the Claim Form carefully and provide all the information required. Only one Claim Form may be submitted per telephone number.

10. When will I receive my check?

Payments in the form of a check to Settlement Class Members will be made only after the Court grants Final Approval to the Settlement and after any appeals are resolved (see “Final Approval Hearing” below). If there are appeals, resolving them can take time. Please be patient.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want benefits from the Settlement, and you want to keep the right to sue or continue to sue Defendant on your own about the legal issues in this case, then you must take steps to get out of the Settlement. This is called excluding yourself—or it is sometimes referred to as “opting out” of the Settlement Class.

11. How do I get out of the Settlement?

If you do not want to be part of the Settlement, you must formally exclude yourself from the Settlement. This is called a Request for Exclusion, and is sometimes also called “opting out.” If you opt out, you will not receive Settlement benefits or payment. However, you will keep any rights you may have to sue Defendant on your own about the legal issues in this case.

If you exclude yourself, you are telling the Court that you do not want to be part of the Settlement. You will not be eligible to receive any Settlement benefits if you exclude yourself.

The deadline to exclude yourself from the Settlement is February 25, 2026.

To be valid, your Request for Exclusion must have the following information:

1. the name of the Litigation: *Summerton. v. Goldco Direct LLC*, Case No. 3:23-cv-00238-WMC pending in the United States District Court for the Western District of Wisconsin;
2. Your full name, mailing address, telephone number and email address;
3. Personal signature; and
4. The words “Request for Exclusion” or a clear and similar statement that you do not want to participate in the Settlement.

You may only exclude yourself – not any other person

Mail your Request for Exclusion to the Settlement Administrator at the following address: Goldco Direct LLC TCPA Settlement c/o Settlement Administrator, P.O. Box 25226 Santa Ana, CA 92799 or submit your Request for Exclusion online at www.GoldcoTCPASettlement.com.

Your Request for Exclusion must be submitted, postmarked or emailed by February 25, 2026.

12. If I do not exclude myself, can I sue Defendant for the same thing later?

No. Unless you exclude yourself, you give up the right to sue Defendant or any of the Released Parties for the claims that the Settlement resolves. You must exclude yourself from this Settlement Class in order to pursue your own lawsuit.

13. What am I giving up to stay in the Settlement Class?

Unless you opt out of the Settlement, you cannot sue or be part of any other lawsuit against Defendant or the Released Parties about the issues in this case, including any existing litigation, arbitration, or proceeding. Unless you exclude yourself, all of the decisions and judgments by the Court will bind you.

The Settlement Agreement is available at www.GoldcoTCPASettlement.com. The Settlement Agreement provides more detail regarding the Releases and describes the Released Claims with specific descriptions in necessary, accurate legal terminology, so read it carefully. You can talk to the law firms representing the Settlement Class listed in Question 15 at no charge to you, or you can, at your own expense, talk to your own lawyer if you have any questions about the Released Claims or what they mean.

14. If I exclude myself, can I still get a payment?

No. You will not get a payment from the Gross Settlement Fund if you exclude yourself from the Settlement.

THE LAWYERS REPRESENTING YOU**15. Do I have a lawyer in the case?**

The Court has appointed the following lawyers as “Class Counsel” to represent all members of the Settlement Class.

Michael Eisenband, Esq.
Eisenband Law, P.A.
515 E Las Olas Blvd. Suite 120
Fort Lauderdale, Florida 33301

Manuel S. Hiraldo, Esq.
Hiraldo P.A.
401 E. Las Olas Boulevard, Suite 1400
Ft. Lauderdale, Florida 33301

You will not be charged for these lawyers. If you want to be represented by another lawyer, you may hire one to appear in Court for you at your own expense.

16. How will the lawyers be paid?

Class Counsel intend to request up to 33.3% of the Settlement Fund for attorneys’ fees plus their out-of-pocket expenses incurred in the litigation. The fees and expenses awarded by the Court will be paid out of the Gross Settlement Fund. The Court will decide the amount of fees and expenses to award.

Class Counsel will also request a Service Award of up to \$7,500 to the Plaintiff for her service as Class Representative on behalf of the whole Settlement Class. Any Service Award will be paid out of the Gross Settlement Fund.

OBJECTING TO THE SETTLEMENT

17. How do I tell the Court if I 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 cannot object if you have excluded yourself from the Settlement.

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

1. the name of the Litigation: *Summerton. v. Goldco Direct LLC*, Case No. 3:23-cv-00238-WMC, pending in the United States District Court for the Western District of Wisconsin;
2. your full name, mailing address, telephone number, and email address;
3. a clear description of all the reasons you object; include any legal support, such as documents, you may have for your objection;
4. if you have hired your own lawyer to represent you at the Final Approval Hearing, provide their name and telephone number;
5. 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;
6. if you plan on calling witnesses or submitting documents at the Final Approval Hearing, provide a full list of both;
7. 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 February 25, 2026. You must also send a copy of the objection to the Settlement Administrator, Class Counsel, and counsel for Defendants.

Clerk of Court	Settlement Administrator
United States District Court Western District of Wisconsin Clerk of Court Joel Turner 120 N. Henry St., Rm. 320 Madison, WI 53703	Goldco Direct LLC TCPA Settlement c/o Settlement Administrator P.O. Box 25226 Santa Ana, CA 92799
Class Counsel	Counsel for Defendant
Manuel Hiraldo, Esq., Hiraldo, PA 401 East Las Olas Boulevard Suite 1400, Fort Lauderdale, FL 33301	Paul A. Rigali, Larson LLP, 555 South Flower Street, 30th Floor, Los Angeles, CA 90071.

18. What is the difference between objecting and asking to be excluded?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself. Excluding yourself is telling the Court that you do not want to be part of the Settlement. If you exclude yourself, you have no basis to object to the Settlement because it no longer affects you.

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THE FINAL APPROVAL HEARING

The Court will hold a hearing to decide whether to approve the Settlement and any requests for fees and expenses (“Final Approval Hearing”).

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

The Court has scheduled a Final Approval Hearing on March 26, 2026 at 11:00 a.m. at 120 N. Henry St., Rm. 320 Madison, WI 53703. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check www.GoldcoTCPASettlement.com for updates. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will also consider the requests by Class Counsel for attorneys’ fees and expenses and for a Service Award to the Class Representative. If there are objections, the Court will consider them at that time. After the hearing, the Court will decide whether to approve the Settlement. It is unknown how long these decisions will take.

20. Do I have to attend the hearing?

No. Class Counsel will answer any questions the Court may have. But you are welcome to attend the hearing at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you submitted your written objection on time to the proper addresses and it complies with all the other requirements set forth above, the Court will consider it. You may also pay your own lawyer to attend the hearing, but it is not necessary.

21. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, your timely filed objection must include a statement of whether you intend to appear at the Final Approval Hearing and copies of any papers, exhibits, or other evidence that you will present to the Court in connection with the Final Approval Hearing (*see* Question 17 above).

You cannot speak at the hearing if you exclude yourself from the Settlement.

IF YOU DO NOTHING

22. What happens if I do nothing at all?

If you are a Settlement Class Member and do nothing, meaning you do not file a timely Claim, you will not get benefits from the Settlement. Further, unless you exclude yourself, you will be bound by the judgment entered by the Court.

GETTING MORE INFORMATION

23. How do I get more information?

This Notice summarizes the proposed Settlement. You are urged to review more details in the Settlement Agreement. For a complete, definitive statement of the Settlement terms, refer to the Settlement Agreement at www.GoldcoTCPASettlement.com. You also may write with questions to the Settlement Administrator at Goldco Direct LLC TCPA Settlement c/o Settlement Administrator, P.O. Box 25226 Santa Ana, CA 92799 or call the toll-free number, (833) 647-8970.

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