

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

ERIC DE FORD, et al,

Plaintiffs,

v.

JAMES KOUTOULAS, et al.,

Defendants.

Case No. 6:22-cv-652-PGB-DCI

**DECLARATION OF AARON M. ZIGLER IN SUPPORT OF PLAINTIFFS’
MOTION FOR APPROVAL OF THE PROPOSED CLASS NOTICE PLAN**

I, Aaron M. Zigler, declare as follows:

1) I am an attorney duly admitted to practice in the States of Illinois, Missouri, California, and New York and I am the founding member of Zigler Law Group, LLC, which represents Lead Plaintiffs in the above-captioned action. I have personal knowledge of the matters stated herein. If called as a witness, I could, and would, competently testify to the matters stated herein. This declaration is submitted in support of the Motion for Approval of the Proposed Class Notice Plan.

2) On March 28, 2025, the Court entered an order certifying the following class: “All persons who, between November 2, 2021, and March 15, 2022, purchased LGBCoin.”

3) Following the March 28, 2025 Order, Class Counsel sought and obtained quotes from four vendors with experience notifying class members of a pending securities lawsuit involving cryptocurrency and digital assets. Class Counsel diligently reviewed and evaluated the proposals from each vendor.

4) Upon review, Class Counsel believe the Angeion Group, LLC, is the most desirable organization to serve as Notice Administrator to assist in disseminating the notices and processing requests for exclusion from the Class.

5) Class Counsel have prepared two proposed Notices to Class Members to advise them of the lawsuit and the relevant information a Class Member would need to understand and exercise their rights.

6) A copy of the proposed Summary Notice is attached hereto as Exhibit 1, while a copy of the longer-form Notice is attached hereto as Exhibit 2. Both forms of Notice individually and the two forms combined satisfy due process requirements and comply with the requirements of Rule 23 of the Federal Rules of Civil Procedure.

7) In consultation with the Angeion Group, Class Counsel propose a notice plan whereby Class Members are provided the Summary Notice via the following methods: (1) email to the address provided by Defendants or by

cryptocurrency exchanges that potential class members used to purchase LGBCoin; (2) publication of the summary notice in PR Newswire, as well as made available on the DTC Electronic Legal Notice system; (3) publication of the longer-form Notice on a website to be established by the Administrator as well as on the websites of Class Counsel; (4) publication on social media, specifically on <http://www.reddit.com/r/LGBCoin>; (5) publication of the Summary Notice by Defendants on social media platforms/channels that are accessible to Defendants but not Plaintiffs, including but not limited to Telegram and Discord channels; (6) publication of the Summary Notice on the LGBCoin website at www.letsgobrandon.com; and, (7) notice directed by first class mail to Class Members whose mailing addresses are available where there is not an email address associated with a particular transaction or where the notice email is returned as undeliverable.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: April 11, 2025

By:



Aaron M. Zigler