

**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

**NOTICE OF CLASS CERTIFICATION**

**If You Bought the LetsGoBrandon Coin,  
You May be a Member of a Certified Class**

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

- A class action lawsuit is pending in the United States District Court for the Middle District of Florida (the “Court”) against James Koutoulas and LGBCoin, LTD (the “Defendants”). The lawsuit alleges that Defendants violated U.S. Securities laws by unlawfully offering the sale of unregistered LetsGoBrandon Coin (“LGBCoin”) securities.
- The Court decided that this lawsuit should proceed as a class action on behalf of a group of people and entities that may include you. The Class consists of all persons who purchased LGBCoin between November 2, 2021, and March 15, 2022.

**If you are a member of the Class, your legal rights will be affected by this case whether you act or do not act. Read this notice carefully.**

**YOUR LEGAL RIGHTS AND OPTIONS WITH REGARD TO THIS SETTLEMENT**

<b><i>Do Nothing</i></b>	<b>Stay in the lawsuit. Await the Outcome. Share in possible benefits. Give up certain rights.</b> By doing nothing, you are choosing to stay in the Class. You will be permitted to share in any recovery that may result from this class action, but you will give up your
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	rights to sue Defendants in a separate lawsuit for the claims made in this class action. In addition, you will be bound by past and any future court rulings on, or settlement of, the claims against Defendants.
<b><i>Ask to be Excluded</i></b>	<b>Get out of this lawsuit. Get no benefits. Keep your rights.</b> If you opt out of the Class (meaning you state in writing that you do not want to be included in this lawsuit), you will not be entitled to any recovery that may result from this class action and you will not be bound by any past or future rulings in this lawsuit. You will be free to pursue your own claims against Defendants on your own or as part of a different lawsuit.

These rights and options, and the deadlines to exercise them, are explained in further detail later in this Notice.

**Further Information:** Lead Plaintiffs are represented by Aaron Zigler of Zigler Law Group, LLC, 308 Jefferson St., Ste. 333, Chicago, IL 60661, (312) 535-5995, [aaron@ziglerlawgroup.com](mailto:aaron@ziglerlawgroup.com) and Sean T. Masson, Esq. of Scott+Scott Attorneys At Law LLP, The Helmsley Building, 230 Park Avenue, 17th Floor, New York, NY 10169, 212-223-6444 [smasson@scott-scott.com](mailto:smasson@scott-scott.com). Further information regarding the Action, the Settlement, and this Notice may be obtained by contacting Class Counsel or the Settlement Administrator at: [LGBCoinCryptoAction.com](http://LGBCoinCryptoAction.com).

### **BASIC INFORMATION ABOUT THE LAWSUIT**

#### **1. Why did I receive this Notice?**

Records indicate that you may have purchased LGBCoins between November 2, 2021, and March 15, 2022. You have legal rights and options that you may exercise. Judge Paul G. Byron of the United States District Court for the Middle District of Florida is overseeing this class action. The case is known as Eric DeFord, *et al* v. James Koutoulas, *et al*, Case No. 6:22-cv-652-PGB-DCI (the “Action” or “Lawsuit”).

#### **2. Why is this lawsuit called a “class action”?**

A class action is a type of lawsuit in which similar claims of a large number of individuals or entities are prosecuted together, which allows for the efficient and consistent resolution of common claims among a group of persons in a single proceeding. In a class action, the court appoints one or more people, known as the Class Representatives, to sue on behalf of all people with similar claims, commonly known as the Class Members. A class action allows the claims of all class members to be heard even though the amount involved may not be large enough for the individual class member to incur the expense of bringing his or her own action. The Court here has certified the lawsuit as a class action for the purposes of this settlement and has appointed Eric De Ford, Sandra Bader, and Shawn Key (the “Lead Plaintiffs”) as the class representatives and the

law firms of Zigler Law Group, LLC and Scott+Scott Attorneys at Law, LPP as Class Counsel.

3. What is this lawsuit about and what has happened?

This Lawsuit alleges that between November 2, 2021, and March 15, 2022 (the “Class Period”), James Koutoulas and LGBCoin, LTD violated the federal securities laws by engaging in an unlawful offer and sale of unregistered securities (in the form of LGBCoins). Specifically, Lead Plaintiffs assert a claim under Section 12(a)(1) (15 U.S.C. §77l(a)(1)) of the Securities Act of 1933, (the “Securities Act”).

Defendants deny these allegations against them. Defendants do not believe that LGBCoin constitutes a security, but instead, Defendants assert that LGBCoin is a meme coin dedicated to conservative advocacy. As such, Defendants contend they are not subject to any portion of the Securities Act of 1933.

Lead Plaintiffs commenced this Action on April 1, 2022, filed an Amended Complaint on June 6, 2022, filed a Second Amended Complaint on July 19, 2022, and filed a Third Amended Complaint on April 14, 2023. Defendants filed motions to dismiss the Third Amended Complaint, and the Court issued an Order ruling on the motions to dismiss on March 29, 2024. In the Order ruling on the motions to dismiss, several of the then-Defendants were dismissed and, as a result, Defendants James Koutoulas and LGBCoin, LTD became the only remaining Defendants in this case.

On July 22, 2024, Lead Plaintiffs filed a Motion for Class Certification, Appointment of Class Representatives, and Appointment of Class Counsel. On March 28, 2025, the Court entered an order granting the motion, certifying this case as a class action, appointing Lead Plaintiffs as representative of the Class, and appointing Class Counsel as representatives of the Class. The Court directed Lead Plaintiffs and Defendants to prepare a proposed notice to the Class Members, which was later approved by the Court.

4. What is the current status of the lawsuit?

On March 28, 2025, the Court certified this lawsuit as a Class Action. The Court has scheduled a Final Pretrial Conference for February 17, 2026, at 3:00 p.m. in Courtroom 4B of the Middle District of Florida. A jury trial is scheduled for the trial term beginning on March 2, 2026. All deadlines in this Notice are subject to change by the Court.

5. What are the Class Representatives asking for?

The Class Representatives are asking for money to compensate Class Members for damages caused by Defendants’ conduct, as well as pre-judgment and post-judgment interest and their reasonable attorneys’ fees and costs.

6. Is there any money available now?

No. If the Class receives any money, whether from a settlement or through the enforcement of a judgment, you will receive additional notice.

## **DETERMINING IF YOU ARE A MEMBER OF THE CLASS**

### **7. How do I know if I am a Class Member?**

You are a member of the Class if you purchased LGBCoins during the period from November 2, 2021, and March 15, 2022, inclusive, unless you are specifically excluded as provided below.

### **8. Who is not included in the Class?**

Some people are excluded from the Class by definition. They include: (1) Defendants; (2) Defendants' affiliates, agents, employees, officers, and directors; (3) Plaintiffs' counsel and Defendants' counsel; and (4) Judge Byron, his staff, and any member of his immediate family.

### **9. If I am not sure whether I am included in the Class, is there someone I can contact?**

If you are uncertain about whether you are included in the Class, you may contact Class Counsel or the Settlement Administrator at the address and telephone number listed on Page 2 of this Notice.

### **10. What are my options as a Class Member at this point?**

You must decide whether to stay in the Class or opt out of the Class.

### **11. What happens if I choose to stay in the Class?**

If you stay in the Class, you will be permitted to share in a recovery, if any, that may occur in this Action. But you give up any rights to sue Defendants separately about the same legal claims in this lawsuit. You also will be legally bound by all Orders the Court issues and Judgments the Court makes in this Action, even if there is no recovery.

### **12. How do I stay in the Class?**

You do not have to do anything at this time to stay in the Class.

### **13. What happens if I opt out of the Class?**

If you opt out of the Class (by stating in writing that you do not want to be included in the Class in this Action), you will give up the right to participate in any recovery that may occur, but you will keep any rights you may currently have to sue Defendants regarding the legal claims at issue in this lawsuit. You also will not be bound by the Orders the Court issues and Judgments the Court makes in this Action.

14. How do I opt out of the Class?

If you do not want to remain a member of the Class and wish to opt out, **you must send** a written “Request to Opt Out” to the Notice Administrator so it is received no later than February 11, 2026. Your written request must include:

- o Your name, address, and telephone number;
- o A signed statement confirming that you want to opt out of the Class;
- o The wallet address you used to purchase LGBCoins during the Class Period; and
- o The case name and number, “*Eric DeFord, et al v. James Koutoulas, et al*, Case No. 6:22-cv-652-PGB-DCI”

Your Request to Opt Out must be sent to the following address:

LGBCoin Class Action  
Attn: Exclusions  
P.O. Box 58220  
Philadelphia, PA 19102

15. What happens if I do nothing at all?

By doing nothing, you are choosing to stay in the Class. You don’t have to do anything now if you want to stay in the Class. If you stay in the Class and the Class Representative obtains money or benefits, you will be notified about how to apply for a share. Regardless of whether the Plaintiffs win or lose at trial, you will not be able to sue—or continue to sue Defendants as part of any other lawsuit—about the same legal claims that are the subject of this Action. You will also be legally bound by all Orders the Court issues and Judgments the Court makes in this Action.

**THE LAWYERS REPRESENTING YOU**

16. As a Class Member, do I have a lawyer representing my interests in this case?

Yes. The Court has appointed lawyers to represent the Class and the Class Members. These lawyers are called Class Counsel. The following lawyers are representing the Class:

Aaron M. Zigler, Esq.  
**ZIGLER LAW GROUP, LLC**  
308 S. Jefferson Street | Suite 333  
Chicago, IL 60661  
Tel: 312-673-8427  
www.ZiglerLawGroup.com

Sean T. Masson, Esq.  
**SCOTT+SCOTT ATTORNEYS AT LAW LLP**  
The Helmsley Building

230 Park Avenue, 17th Floor  
New York, NY 10169  
Tel.: 212-223-6444  
www.scott-scott.com

17. How will the lawyers be paid, and will the Class Representatives receive compensation?

To date, Class Counsel have not received any payment for their services in conducting this Action on behalf of the Lead Plaintiff and the Settlement Class, nor have Class Counsel been paid for their expenses.

If recovery is obtained for the Class, Class Counsel will request that the Court grant an award of attorneys' fees and expenses to be paid from the recovery or by Defendants. Class Counsel may also ask the Court to approve reasonable incentive awards for the Class Representatives. If approved, these fees and expenses and incentive awards will either be paid from the recovery obtained for the Class or separately by Defendants.

18. Should I get my own lawyer?

You do not need to hire your own lawyer. However, you are welcome to hire your own lawyer at your own expense. If you hire a lawyer to speak for you or to appear in Court, your lawyer must file a Notice of Appearance.

### **GETTING MORE INFORMATION**

19. Where do I get more information?

Complete copies of the Court filings and rulings are available on <https://pacer.uscourts.gov/>, or by writing to Class Counsel at the addresses provided above. ***Please do not contact the Court or Judge Byron.***