

**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

**SUMMARY NOTICE OF CLASS CERTIFICATION**

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

This Notice is addressed to the members of the following Class of Persons:

ALL PERSONS WHO PURCHASED LETSGOBRANDON COINS (“LGBCOIN”) BETWEEN NOVEMBER 2, 2021 AND MARCH 15, 2022 (THE “CLASS PERIOD”)

**Your Rights May Be Affected**

This is a Summary Notice. The full Court-ordered Notice may be obtained online at [www.LGBCoinCryptoAction.com](http://www.LGBCoinCryptoAction.com).

This Action was filed on April 1, 2022, and subsequently amended multiple times with the final amendment on April 14, 2023. This Action was brought by Plaintiffs Eric De Ford, Sandra Bader, and Shawn Key (“Plaintiffs”) against James Koutoulas and LGBCoin, LTD (collectively, “Defendants”). The claims against all Defendants other than Mr. Koutoulas and LGBCoin, LTD have been dismissed.

Plaintiffs allege that between November 2, 2021, and March 15, 2022 (the “Class Period”), Defendants violated the federal securities laws by engaging in the

unlawful sale of unregistered securities in violation of Section 12(a)(1) of the Securities Act of 1933.

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.

On March 28, 2025, the Court ordered that this Action be certified as a class action, that Eric De Ford, Sandra Bader, and Shawn Key be appointed Class Representatives, and that Zigler Law Group, LLC 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 be appointed Class Counsel. The Court subsequently approved that this Summary Notice be sent to all members of the Class.

The Court will exclude from the Class all members of the Class who wish to be excluded.

To be excluded from the Class, each member **must** make a **written** request to be excluded. Such a request must contain the following information: (i) your name; (ii) your address; (iii) your telephone number; (iv) a signed statement confirming that you want to opt out of the class; (v) the wallet address you used to purchase LGBCoins during the Class Period; and (vi) the name and case number of this Action, "*Eric De Ford, et al v. James Koutoulas, et al*, Case No. 6:22-cv-00652-PGB-DCI". All requests for exclusion must be sent to the Notice Administrator at the address provided below. Exclusion requests must be postmarked no later than February 11, 2026. Subject to the Court's discretion, this will be the only opportunity a Class member will have to be excluded from the Class.

Additional information about this Class Action, including a copy of the full Court-ordered Notice, can be found at [www.LGBCoinCryptoAction.com](http://www.LGBCoinCryptoAction.com) or by contacting the Notice Administrator:

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