

ATTACHMENT A  
SCHACTER DECLARATION

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE: TELEXFREE SECURITIES LITIGATION

MDL No. 4:14-md-2566-TSH

This Document Relates to:

ALL CASES

DECLARATION OF ERIC A. SCHACHTER IN SUPPORT OF MOTION FOR FINAL  
APPROVAL OF SETTLEMENTS WITH DEFENDANTS JOSEPH CRAFT AND CRAFT  
FINANCIAL SOLUTIONS, INC., BASE COMMERCE, LLC, SYNOVUS BANK, AND  
CERTAIN RELATED PARTIES

I, Eric A. Schachter, declare:

1. I am a Vice President with A.B. Data, Ltd. ("A.B. Data"). I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.
2. I make this declaration in connection with Plaintiffs' Motion for Final Approval of Settlements with Defendants Joseph Craft, Craft Financial Solutions, Inc., Base Commerce, LLC, Synovus Bank, and Certain Related Parties and in compliance with the terms of the Settlement Agreements.
3. On April 8, 2020, the Court approved the selection of A.B. Data to serve as Claims Administrator for the settlement agreements. The Court directed A.B. Data to provide notice to the Settlement Class and Stephen Darr, the bankruptcy trustee, of the settlements reached with Joseph Craft, Craft Financial Solutions, Inc., Base Commerce, LLC, Synovus Bank, and certain related individuals following preliminary approval of those settlements.

4. On April 16, 2020, A.B. Data commenced sending the approved Class Notice to potential Class Members via email utilizing a list of class member email addresses received from the related TelexFree bankruptcy proceedings. A true and correct copy of the Class Notice is attached hereto as Exhibit 1.

5. Stephen Darr, the bankruptcy trustee, was also sent the Class Notice.

6. A.B. Data implemented certain best practices to avoid SPAM and junk filters and maximize deliverability, such as: not including any attachments to the email; avoiding certain words and phrases likely to trigger filters; and staggering the emails in tranches to maximize deliverability.

7. A.B. Data sent the class notice to 930,629 email addresses. Of these, approximately 635,000 emails were successfully delivered on the first attempt.

8. Any email not successfully delivered after the first attempt was resent to the same email address a few days later. Of these second-round emails, approximately 110,000 were successfully delivered.

9. Of the 930,629 email address, 184,561 emails were ultimately undeliverable.

10. On April 16, 2020, A.B. Data implemented a toll-free telephone number, (877) 829-4140, with an automated interactive voice response system to assist potential class members in understanding the terms of the settlements and their rights. Callers have the option to speak with a live operator during business hours if they need further help. As of the date of this declaration, the toll-free telephone number has received 474 calls from potential class members, of which 193 spoke with a live operator.

11. On April 16, 2020, A.B. Data implemented a case-specific website for this matter at [www.telexfreesettlement.com](http://www.telexfreesettlement.com). The website featured a summary version of the class notice on

the homepage, a link to download pdf versions of the full class notices and related court documents, a list of important dates, and contact information for A.B. Data and Lead Counsel. As of the date of this declaration, the website has received 51,352 total hits.

12. The postmark deadline to object to the settlements was May 22, 2020. A.B. Data received four objections. These objections are attached hereto as Exhibit 2.

13. The postmark deadline for class members to be excluded from the settlements was May 22, 2020. A.B. Data received nine requests for exclusion. These requests for exclusion are attached hereto as Exhibit 3. Although the Class Notice directed that requests for exclusion be mailed to A.B. Data's P.O. Box, six of the nine requests for exclusion that we received were submitted via email.

14. The following individuals requested to be excluded from the settlements:

Kwikook Kim	Maria Emilia Sacchetto Moss
Gabriel Nicolae Serdin	Winicius Janones Martinelli
Neuzira Maria Mendes Rosa	Stefano Camoni
Linda Vanni	Baldi Silvia
Rivieccio Lucia Rafaela	

15. On June 19, 2020, at Mr. Bonsignore's direction, I provided copies of all objections and requests for exclusion to counsel for the Settling Defendants via email.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 7<sup>th</sup>, 2020 in Milwaukee, WI



Eric S. Schachter