

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

If Global Credit & Collection Corporation sent you a collection letter that made representations about reporting a settlement to the IRS, you may benefit from this class action settlement.

The case is titled Leon Lopez v Global Credit and Collection Corporation and Galaxy Portfolios, LLC, Case No. 17-cv-427 (“Litigation”). A Federal Court authorized this notice. This is not a solicitation from a lawyer.

**THIS IS A NOTICE OF A SETTLEMENT OF A CLASS ACTION LAWSUIT.
THIS IS NOT A NOTICE OF A LAWSUIT AGAINST YOU.**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
COMPLETE A CLAIM FORM TO RECEIVE A PORTION OF SETTLEMENT PROCEEDS	If you wish to receive a portion of the class settlement proceeds, you must complete and return the claim form on or before December 17, 2018 .
EXCLUDE YOURSELF	You will receive no benefits, but you will retain your legal claims against the Defendants.
OBJECT	Write to the Court explaining why you don’t like the settlement. You may also appear at the fairness hearing.
GO TO A HEARING	Ask to speak in Court about the fairness of the settlement.
DO NOTHING	If you do nothing, you will receive no benefits from the settlement and will not retain your legal claims against the Defendants.

1. Why did I get this notice?

You are receiving this notice because you were identified as a person to whom Global Credit and Collection Corporation sent a collection letter similar to the collection letter received by the plaintiff in this case.

2. What is the lawsuit about?

This lawsuit claims that Global Credit and Collection Corporation and Galaxy Portfolios, LLC violated the Fair Debt Collection Practices Act, (“FDCPA”), 15 U.S.C. §1692 *et seq.* by sending letters attempting to collect upon a debt which made false representations about reporting forgiveness of the debt to the IRS.

3. Why is this a class action?

In a class action, one or more people called Class Representatives (in this case, Leon Lopez), sue on behalf of a group (or a “Class”) of people who have similar claims regarding the collection letters allegedly used by Defendants in an attempt to collect a debt.

4. Why is there a settlement?

To avoid the cost, risk, and delay of litigation, the parties reached a settlement agreement as to Plaintiff’s and the Class’s claims in the Litigation.

5. How do I know if I am a part of the settlement?

According to Defendants’ records, you are a class member.

YOUR BENEFITS UNDER THE SETTLEMENT

6. What can I get from the settlement?

Only if you timely and properly complete the claim form attached hereto will you be entitled to a *pro rata* share of the Class Recovery. The Class Recovery will be \$28,125.00. If all 6,250 class members return a claim form, which is unlikely, and decide to remain in the class, you will receive approximately \$4.50. If 10% of the class members return a claim form, you will receive approximately \$45.00. If only 1% of the class members return a claim form, you will receive approximately \$450. No class member is eligible to receive more than one check.

7. When will I receive these benefits?

You will receive these benefits approximately 45-60 days after the Court enters a Final Approval Order. This estimation is premised on the assumption that no objections are received.

**QUESTIONS? CALL 312-917-4504 TO CONTACT CLASS COUNSEL’S OFFICE
PLEASE REFER TO SETTLEMENT #32498**

8. I want to be a part of the settlement and receive these benefits. What do I do?

Timely and properly submit the claim form attached hereto.

9. What am I giving up to receive these benefits?

By staying in the class, all of the Court's orders will apply to you, and you give Defendants a "release". A release means you cannot sue or be part of any other lawsuit against Defendants about the claims or issues in the case.

10. How much will the Class Representative receive?

Plaintiff Lopez brought two separate claims in this case. One claim was brought as an individual claim (only on behalf of Plaintiff) and the other was the class claim (which you share with Plaintiff). Under the terms of the Agreement, Plaintiff Lopez will receive a payment which includes his damages for both the claims and an incentive award for acting as the class representative. The total payment to Plaintiff Lopez will be \$2,000, which is subject to the Court's Approval.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to receive the benefits of the settlement, but you want to keep your legal claims against the Defendants, then you must take steps to exclude yourself from this settlement.

11. How do I get out of the settlement?

To exclude yourself from the settlement, you must send a letter by mail stating that you want to be excluded from *Leon Lopez v Global Credit and Collection Corporation and Galaxy Portfolios, LLC*, Case No. 17-cv-427 (N.D. IL.) Be sure to include your name, address, telephone number, and your signature. You must mail your exclusion request so that it is postmarked **no later than December 17, 2018**, to:

**Cassandra P. Miller (32498)
Edelman, Combs, Lattuner & Goodwin, LLC
20 S. Clark St., Suite 1500
Chicago, IL 60603**

12. If I exclude myself, do I still receive benefits from this settlement?

No, you will not receive anything resulting from the settlement, but you will have the right to sue Global Credit and Collection Corporation and Galaxy Portfolios, LLC over the claims raised in the Litigation, either on your own or as a part of a different lawsuit. If you exclude yourself, the time you have in which to file your own lawsuit (called the "statute of limitations") will begin to run again. You will have the same amount of time to file the suit that you had when this case was filed.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in this case?

The Court has named the law firm of Edelman, Combs, Lattuner & Goodwin, LLC as Class Counsel. You will not be charged for these lawyers; however, they will receive a payment from the Defendants in an amount to be determined by and approved by the Court and as set forth below in Paragraph 14. If you want to be represented by your own lawyer, you may hire one at your own expense. If you choose to hire your own lawyer, he or she must file an appearance by **January 8, 2019**.

14. How will the lawyers be paid?

Subject to the Court's approval, Defendants will pay Class Counsel, Edelman, Combs, Lattuner & Goodwin, LLC a total of \$20,190.00, as attorneys' fees and costs incurred with respect to the Plaintiff and the Class' claims. This payment will be made in addition to the Class Recovery and will not reduce the amount that you or any other class member are entitled to receive from the settlement.

CLASS COUNSEL'S VIEWS ABOUT THE SETTLEMENT

15. Is this a fair settlement?

Class Counsel believes that this settlement is fair. The claims asserted on behalf of the class against Defendants are under the FDCPA. The FDCPA is a federal statute which provides for both individual actions and class actions. In an individual action, the person bringing the suit may recover (i) any actual damages suffered; and (ii) statutory damages of between \$0 and \$1,000.00. (Plaintiff's complaint did not allege actual damages on behalf of the class). In a class action, the maximum possible recovery is (i) any actual damages suffered by the class members and (ii) the lesser of 1% of the Defendant's net worth or \$500,000.00. The Court, in its discretion, may award anything up to the maximum amount to a prevailing party. In either an individual or class action, the person bringing the suit can also recover attorneys' fees and the expenses of prosecuting the suit, if it is successful. Based upon the financial information that Defendants provided to Class Counsel and the nature of the claims alleged, Class Counsel believes this is a fair and reasonable settlement.

16. What is the Defendant's view of this settlement?

As stated above, by settling this lawsuit, Global Credit and Collection Corporation and Galaxy Portfolios, LL are not admitting that they did anything wrong. Defendants expressly deny the claims asserted by the Plaintiff and deny all allegations of wrongdoing and liability.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the settlement or some part of it.

17. How do I tell the Court that I do not like the Settlement?

If you are a class member, you can object to the settlement. In order to object to the settlement or any part of the settlement, you must send a letter stating that you object and the reasons why you think the Court should not approve the settlement. You must include the name and number of the case: *Lopez v. Global Credit and Collection Corp. and Galaxy Portfolios, LLC*, Case No. 17-cv-427 (N.D. Ill.), your name, address, telephone number, and your signature. If you are objecting to the settlement, you may also appear at the fairness hearing (explained below in answer to question no. 18). You must mail your objection so that it is postmarked no later than **December 17, 2018** to:

**Clerk of the Court
United States District Court for the Northern District of Illinois,
219 South Dearborn Street,
Chicago, IL 60604**

You must also send a copy of your objection to these attorneys:

**Cassandra P. Miller (32498)
Edelman, Combs, Lattuner &
Goodwin, LLC
20 S. Clark St., Suite 1500
Chicago, IL 60603**

**Brian Ledebuhr
Vedder Price PC
222 N. LaSalle St., Suite 2300
Chicago, IL 60601**

THE FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the settlement. You may attend if you wish, but you are not required to do so.

18. Where and when is the fairness hearing?

The Court will hold a fairness hearing on **January 9, 2019** at **10:00am** in the courtroom of Judge Manish S Shah, Room 1919 of the United States District Court for the Northern District of Illinois Eastern Division, Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604. The purpose of the hearing will be for the Court to determine whether the proposed settlement is fair, reasonable, and adequate, and in the best interests of the class, and to determine the appropriate amount of compensation for Class Counsel. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the proposed settlement.

YOU ARE **NOT** REQUIRED TO ATTEND THIS HEARING TO BENEFIT FROM THIS SETTLEMENT. The hearing may be postponed to a later date without notice.

GETTING MORE INFORMATION – CONTACT:

**Cassandra P. Miller (32498)
Edelman, Combs, Lattuner & Goodwin, LLC
20 S. Clark St., Suite 1500
Chicago, IL 60603
(312) 917-4504
info@edcombs.com
www.edcombs.com**

Lopez v Global
Class-Settlement.com
PO Box 9009
Hicksville, NY 11802-9009

CLAIM FORM

Leon Lopez v. Global Credit and Collection Corp. and Galaxy Portfolios, LLC, Case No. 17-cv-427 (N.D. Il.)

I WISH TO CLAIM MY PORTION OF THE SETTLEMENT FUND IN THIS CASE:

Name: _____

Mailing Address: _____

City / State / Zip: _____

I submit this Claim Form under penalty of perjury and swear that I received the above-described letter.

SIGNATURE: _____

If your name or address is different from what appeared on the envelope please provide the correct information below:

Name: _____

Mailing Address: _____

City / State / Zip: _____

THIS CLAIM FORM MUST BE RETURNED BY DECEMBER 17, 2018 TO:

Lopez v. Global
Class-Settlement.com
PO Box 9009
Hicksville, NY 11802-9009