

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**If you answered one or more prerecorded telephone calls between  
November 8, 2019, and October 25, 2023, from Citizens Disability, LLC,  
a class action lawsuit may affect your rights.**

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

- A lawsuit has been filed against Citizens Disability, LLC (“Citizens Disability”) claiming it placed prerecorded telephone calls through a platform to individuals who did not give their prior express written consent. Citizens Disability denies any wrongdoing and is vigorously defending the lawsuit.
- If you filled out a form on GrantsAssistanceForYou.com and answered one or more prerecorded calls from Citizens Disability, LLC, between November 8, 2019, and October 25, 2023, then a class action lawsuit may affect your rights.
- The Court has not yet decided whether Citizens Disability did anything wrong. There is no money available now and no guarantee that there will be. Your legal rights are affected, however, and you now have a choice to make, as described below.

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT</b>		<b>DEADLINE</b>
<b>DO NOTHING</b>	Stay in this lawsuit. Await the outcome. Give up certain rights. By doing nothing, you automatically keep the possibility of getting money or benefits that may come from a trial or settlement. You will give up any rights to separately sue Citizens Disability for the legal claims involved in this lawsuit and will be bound by any judgment or settlement in this lawsuit.	N/A
<b>ASK TO BE EXCLUDED</b>	Get out of this lawsuit. Receive no money or benefits from it. Keep your right to sue separately. If you ask to be excluded and money or benefits are later awarded, you will not get any money or benefits. You will keep your right to separately file a lawsuit against Citizens Disability for the same legal claims asserted in this lawsuit.	Postmarked by <b>DECEMBER 29, 2024.</b>

- Your options are explained in this Notice. To ask to be excluded, you must act before December 29, 2024. To remain a part of this lawsuit, you do not need to do anything.
- If you do nothing, and if this lawsuit is not resolved before trial, the Plaintiffs’ lawyers must prove the legal claims against Citizens Disability at trial. If money or benefits are obtained from Citizens Disability, you will then be notified about how to potentially receive a share.

**Questions? Go to [www.CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com)  
or call 1-888-884-7716**

## BASIC INFORMATION

### 1. Why is this Notice being provided?

The Court authorized this Notice to inform you that the Court has certified (or, allowed to proceed), a class action lawsuit that may affect you. You have legal rights and options that you may exercise, as described in this Notice. Chief Judge K. Michael Moore of the United States District Court for the Southern District of Florida is presiding over this lawsuit. The lawsuit is called *Shutler v. Citizens Disability, LLC*, Civil Action No. 2:23-cv-14337-KMM-RMM.

### 2. What is this lawsuit about?

This lawsuit claims that Plaintiff Michael Shutler, and other persons nationwide, answered one or more prerecorded telephone calls where Citizens Disability's only lead source for the person called was GrantsAssistanceForYou.com. The lawsuit alleges that Citizens Disability violated the federal Telephone Consumer Protection Act, 47 U.S.C. § 227 ("TCPA"), because that law prohibits placing prerecorded calls to people without their prior express written consent.

### 3. What is a class action and who is involved?

In a class action, a person called the "Class Representative," (in this case, Michael Shutler), sues on behalf of a group (or groups) of people who have similar legal claims. The people collectively are called a "Class," and each person is called a "Class Member." The individual who sues—and all of the Class Members—are called the "Plaintiffs." The entity or company they sue, (in this case, Citizens Disability), is called the "Defendant." In a class action lawsuit like this one, the Court resolves the issues and legal claims in the lawsuit for all Class Members, **except** for those who exclude themselves from the Class.

Additional information about the Court's reasons for allowing this lawsuit to proceed as a class action is available in the Court's Memorandum Opinion and Order, dated September 9, 2024, which is available at [www.CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com) in the Court Documents section.

## THE LEGAL CLAIMS IN THE LAWSUIT

### 4. What are the Plaintiff's legal claims in this lawsuit?

The legal claims that are made by Plaintiff in this lawsuit are described above in the answer to Question 2. For additional information, you may read a copy of Plaintiff's Class Action Complaint, available at [www.CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com) in the Important Documents section.

### 5. What does Citizens Disability say about the Plaintiff's legal claims?

Citizens Disability denies that it did anything wrong or violated any law. Specifically, it claims that it did not make the calls. It also claims that if it did make any of the calls, it had prior express written consent to call each person. You can read a copy of Citizens Disability's Answer to Plaintiff's Class Action Complaint, which is available at [www.CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com) in the Court Documents section.

### 6. Did the Court decide who is right?

The Court has not decided whether Plaintiff or Citizens Disability is correct or who is the winning party. By certifying the Class and issuing this Notice, the Court is not suggesting whether Plaintiff will win or lose this lawsuit. Unless the lawsuit settles, the Plaintiff must prove his legal claims at a trial or through legal motions to recover money or damages.

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## **7. What is Plaintiff asking for?**

The Plaintiff is asking the Court to award each Class Member monetary damages of \$500 per each prerecorded call answered from Citizens Disability from November 8, 2019, to October 25, 2023. If Plaintiff proves that, and further proves that Citizens Disability “willfully” or “knowingly” violated the TCPA, he will ask for up to \$1,500 per each prerecorded call answered by a Class Member. The Plaintiff is also asking the Court to enter an Order prohibiting Citizens Disability from violating the TCPA in the future.

## **8. Is there money available at this time?**

No money or benefits are available now because the Court has not decided whether Citizens Disability did anything wrong, and the Plaintiff and Defendant have not settled the lawsuit. There is no guarantee that money or benefits will ever be obtained. If they are, you will be notified about what has been awarded and how to receive an award.

## **WHO IS IN THE CLASS**

## **9. Am I part of the Class?**

The Class certified by the Court consists of the following individuals:

All people in the United States (1) who answered one or more prerecorded calls from Citizens, (2) made from the Pipes.ai calling platform, (3) between November 8, 2019, and October 25, 2023, (4) and at the time of the call Citizens’ only lead source for the person called was GrantsAssistanceForYou.com.

You are a Class Member if you are in the United States and you answered one or more prerecorded calls from Citizens Disability made from the Pipes.ai calling platform between November 8, 2019, and October 25, 2023, and, at the time of the call, Citizens Disability’s only lead source for you was GrantsAssistanceForYou.com.

You were identified as a potential Class Member because your telephone number appeared in Citizens Disability’s call records. You likely received an email notifying you of this lawsuit. If you did not receive an email, you may still be part of the Class if your telephone number appears in Citizens Disability’s records. You may be able to obtain your telephone bill and/or records from your telephone carrier, but you do not need to submit that information at this time. If you have any questions about how to obtain this information, or if you are still not sure if you are included in the Class, you may visit [www.CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com) or call the Class Action Administrator at 1-888-884-7716. You may also receive free help by calling the lawyers in this lawsuit at the telephone number listed under Question 19 below.

## **YOUR RIGHTS AND OPTIONS**

You have a choice to make now about whether to stay in the Class or ask to be excluded before the trial.

## **10. What happens if I do nothing?**

If you are a Class Member, by doing nothing you will remain in the Class. If you stay in the Class and the Plaintiff/Class Representative obtains money or benefits as a result of any trial or settlement of this lawsuit, you will be notified about how to apply for a share (or how to ask to be excluded from any settlement). If you are a member of the Class and you do nothing now, regardless of whether the Plaintiff/Class Representative wins or loses in legal motions or at trial, you will not be able to file your own lawsuit, or continue to separately sue, Citizens Disability—as part of any other lawsuit—about the same legal claims that are the subject of this lawsuit. This means that if you do nothing, you may not be able to sue Citizens Disability for the TCPA violations related to the prerecorded calls you may have answered between November 8, 2019, and October 25, 2023. You will also be legally bound by all of the Orders the Court issues and judgments the Court may make hereafter in this class action.

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or call 1-888-884-7716**

## 11. Why would I ask to be excluded?

If you already have filed, or want to file, your own lawsuit against Citizens Disability for the same types of prerecorded calls it made during the same time period, and want to continue pursuing your individual lawsuit, you need to ask to be excluded from the Class. If you exclude yourself from the Class—sometimes referred to as “opting out” of the Class—you will not get any money or benefits from this lawsuit if any are awarded or obtained as a result of the trial, legal motions, or from any settlement (that may or may not be reached) in this lawsuit between Plaintiff/Class Representative and Citizens Disability. However, you will be able to continue to pursue your own lawsuit, or separately file your own lawsuit, against Citizens Disability for the calls that are at issue in this lawsuit. If you exclude yourself from the Class, you will not be legally bound by the Court’s judgments in this lawsuit. If you start your own lawsuit against Citizens Disability after excluding yourself from this Class, you will need to hire and pay your own lawyer for your lawsuit (if needed), and you will need to prove your individual legal claim(s).

## 12. How do I ask to be excluded from the Class?

To exclude yourself from the Class, you must mail a written request for exclusion stating that you want to be excluded from *Shutler v. Citizens Disability, LLC*, Civil Action No. 2:23-cv-14337-KMM-RMM.

Your request for exclusion must include the following:

- 1) Your name and address
- 2) The telephone number that answered the prerecorded calls at issue in this lawsuit
- 3) Your signature

Your exclusion request must be **mailed** to the Class Action Administrator at the following address **postmarked by December 29, 2024**:

*Shutler v. Citizens Disability, LLC*  
EXCLUSIONS  
Class Action Administrator  
P.O. Box 2850  
Portland, OR 97208-2850

**You cannot opt out (exclude yourself) by telephone or by email.**

## THE LAWYERS REPRESENTING YOU

## 13. Do I have a lawyer in this lawsuit?

The Court has appointed a team of lawyers from the law firm LawHQ, P.C. to represent the Class. They are called “Class Counsel.” They are experienced in handling similar class action lawsuits and legal claims.

## 14. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf in this lawsuit and was appointed by the Court to do so. If you want someone else to represent you in this lawsuit, you may hire your own lawyer, at your own expense.

## 15. How will Class Counsel be paid?

If Class Counsel obtains money or benefits for the Class, they may ask the Court for attorneys’ fees and expenses. You will not have to pay these fees and expenses. If the Court grants such a request by Class Counsel, the fees and expenses typically would be deducted from any money obtained for the Class or paid separately by Citizens Disability.

## THE TRIAL

### 16. How/when will the Court decide who is right in this lawsuit?

If the lawsuit is not decided through legal motions or settled, Class Counsel will have to prove Plaintiff's and the Class's legal claims at a trial. The trial will be held at the United States District Courthouse, 101 South U.S. Highway 1, Ft. Pierce, Florida. A trial date has been scheduled for **April 7, 2025, at 9:00 a.m. EST**. During the trial, a jury or the judge will hear all of the evidence to reach a decision about whether the Plaintiff or Citizens Disability is right about the claims in the lawsuit. There is no guarantee that the Plaintiff will win or that any money or benefits will be awarded to the Class Members.

### 17. Do I need to come to the trial?

You do not need to attend the trial. During the trial, Class Counsel will present the case for the Plaintiff and Citizens Disability will present its defenses. You are welcome to attend at your own expense.

### 18. Will I get money after the trial?

If the Plaintiff obtains money or benefits as a result of the trial or a settlement, you will be notified about how the money or benefits will be distributed to the Class Members and provided with information regarding your options at that time. Currently, we do not know if any benefits will be available or how long this process will take.

## GETTING MORE INFORMATION

### 19. Where can I get more information?

The website [www.CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com) contains several Court documents containing additional information about the case. This website will be updated with the most current information about the lawsuit as it becomes available.

You may also get additional information by calling toll-free at 1-888-884-7716, or by writing to:

*Shutler v. Citizens Disability, LLC*  
Class Action Administrator  
P.O. Box 2850  
Portland, OR 97208-2850

You may also call Class Counsel at 1-866-710-2484 if you have further questions.

**PLEASE DO NOT CALL THE COURT REGARDING THIS NOTICE.**

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or call 1-888-884-7716**