

A FEDERAL COURT ORDERED THIS NOTICE. THIS IS NOT A SOLICITATION FROM A LAWYER.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Ridenour and Halem v. Multi-Color Corporation and Sterling Infosystems, Inc. (the "Lawsuit")
Civil Action No. 2:15-cv-41**

NOTICE OF CLASS ACTION SETTLEMENT

AUTOMATIC PAYMENT CLASS

You have received this notice because records indicate that you were the subject of a background check prepared by Sterling Infosystems, Inc. ("Sterling"), provided to a third party between January 29, 2013 and October 31, 2016, and that contained at least one criminal record. You disputed to Sterling the criminal record(s) in your report, and Sterling amended your report as a result of your dispute.

Your legal rights will be affected by the Settlement of this Lawsuit. Please read this notice carefully. It explains the Lawsuit, the Settlement, and your legal rights, including the process for receiving a settlement check, excluding yourself from the Settlement, or objecting to the Settlement.

If you live, or previously lived, in Virginia there is also a second part of the Settlement that may affect your rights. If Sterling's records indicate you are or were a Virginia resident about whom it provided to a third party a consumer report containing criminal record information between February 15, 2010 and October 31, 2016, you will receive a second notice packet explaining how to participate in that settlement. You could be a member of both of these settlement classes.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

IF YOU DO NOTHING	If the Court approves the Settlement and you do nothing, you will receive a cash payment of a pro-rata payment of a settlement fund created for the Class – estimated to be between \$20 and \$85. You will not be able to sue Sterling for any claims under the Fair Credit Reporting Act except that you will retain the right to bring an individual claim for any alleged inaccuracy of reports Sterling issued about you.
IF YOU EXCLUDE YOURSELF FROM THE SETTLEMENT	Get out of this Lawsuit. Get no benefits from it. Keep your rights. If you ask to be excluded, you won't receive any money from the Settlement. But, you keep any rights to sue Sterling separately about the same legal claims in this Lawsuit that you otherwise would have had. No attorney will represent you unless you hire your own attorney.
IF YOU OBJECT	You may write to the Court and tell it what you don't like about the Settlement. You will remain a part of the Class and will share in the Settlement. The Court will consider your views when deciding whether the Settlement is fair.

ADDITIONAL INFORMATION ABOUT THE LAWSUIT, THE SETTLEMENT, AND YOUR RIGHTS IS ON THE SETTLEMENT WEBSITE, www.SterlingVirginiaSettlement.com. You can call (757) 930-3660 or (703) 424-7730, or write to the Class Counsel, Leonard A. Bennett, Consumer Litigation Associates, P.C., 763 J. Clyde Morris Blvd., Suite 1-A, Newport News, VA 23601, or by e-mail at len@clalegal.com. PLEASE, DO NOT CALL THE COURT OR STERLING'S COUNSEL REGARDING THIS SETTLEMENT.

1. Why did I receive this notice?

You are a member of the Automatic Payment Settlement Class and are affected by the Settlement because Sterling's records indicate that you were the subject of a consumer report prepared by Sterling and that contained criminal information that was sold to a third party between January 29, 2013 and October 31, 2016. Thereafter you directly or indirectly disputed such criminal record information contained in your consumer report, which resulted in an amendment to the criminal record information contained in the report.

Specifically, for the purposes of settlement only, the Court has provisionally certified a Settlement Class defined as follows:

All natural persons residing in the United States (including all territories and other political subdivisions of the United States) (i) who were the subject of a consumer report sold by Sterling on any platform of Sterling to a third party from January 29, 2013 through October 31, 2016, (ii) whose report contained a criminal record, (iii) who then directly or indirectly disputed such criminal record contained in their consumer report with Sterling, and (iv) whose dispute resulted in an amendment to the criminal record of their report.

If you fall within the foregoing Settlement Class definition, you will be an Automatic Payment Settlement Class Member unless you exclude yourself from the Settlement Class.

A Court authorized the notice because you have a right to know about a proposed settlement of this class action lawsuit and about all of your options before the Court decides whether to give “final approval” to the settlement.

2. What is this lawsuit about?

Plaintiffs Jeffrey Scott Ridenour and Amin Halem were required by their prospective employers to submit to a background check as a condition of employment. Sterling prepared consumer reports for Mr. Ridenour and Mr. Halem for these employers. Plaintiffs each claimed that the consumer report prepared about him contained inaccurate or incomplete criminal information. Mr. Halem disputed the accuracy of the information in his report, and Sterling changed his report as a result of his dispute.

Plaintiffs sued Sterling because they believe that Sterling violated the Fair Credit Reporting Act (FCRA), a federal law. The FCRA requires Sterling to provide notice to a consumer when it furnishes a report to an employer that contains a criminal record item, or otherwise maintain strict procedures to ensure its reports are complete and up to date. 15 U.S.C. § 1681k(a).

Sterling has denied all claims and allegations of wrongdoing asserted in the Lawsuit and contends that it acted lawfully and in compliance with the FCRA. Notwithstanding that Sterling denies liability and any alleged unlawful conduct, Sterling has decided it is in its best interest to settle the Lawsuit to avoid the burden, expense, risk and uncertainty of continuing the Lawsuit.

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

In a class action lawsuit, a person who is called a “Class Representative” (in this case, Jeffrey Scott Ridenour and Amin Halem) sues on behalf of other people who have similar claims. The people together are a “Class” or “Class Members.” The persons who sued – Mr. Ridenour and Mr. Halem – are called the Plaintiffs or the Named Plaintiffs. The company they sued (Sterling) is called the Defendant. One court resolves the issues for everyone in the Class – except for those people who choose to remove themselves from the Class.

4. What does the settlement provide?

You are entitled to an automatic cash payment if you do not exclude yourself from the Settlement. Sterling has agreed to create a settlement fund of \$5,900,000 that will be divided between this Class automatically, and also with members of the Virginia-only class who return an Opt-In Claim Form.

5. How much money will I receive?

The amount of money paid to each class member will be a *pro rata* (equal) distribution from the Settlement Fund, without any cap on the payment. The amount you will receive will depend on how many Class Members can be found, how many exclude themselves, and the number of Virginia-only class members who return forms. Your payment will first be reduced by the Court-approved attorneys’ fees and expenses to Class Counsel, any necessary administrative fees, and Service Awards for Mr. Ridenour and Mr. Halem.

If every possible class member claimed a payment, and taking into consideration Court-approved attorneys’ fees, administrative fees and expenses, your payment could be as low as \$20.00. However, if only 5% of Virginia class members return a claim form, the expected recovery would be about \$85.00.

6. What am I giving up to get a benefit or stay in the settlement class?

If you do not exclude yourself from the Settlement and if the Settlement is approved, you will not be allowed to sue Sterling on any of the claims that are settled. You will release all claims you may or could base on violation of the FCRA or any other federal, state or local law, statute, regulation or common law, that involve a consumer report prepared by Sterling that contained at least one public record. However, you will not release the right to file an individual civil action (as contrasted with another class action) to pursue an individual claim for actual damages under 15 U.S.C. § 1681e(b) based on alleged inaccuracies in any consumer report that Sterling provided about you.

The formal release language and description of the Released Parties are included in the formal Settlement Agreement, which is available on the Settlement website, www.SterlingVirginiaSettlement.com.

7. How do I exclude myself from the settlement?

You may “opt out” or completely exclude yourself from the settlement as explained below.

REQUESTS FOR EXCLUSION THAT ARE NOT POSTMARKED ON OR BEFORE June 16, 2017, WILL NOT BE HONORED.

If you exclude yourself, you should promptly consult your own attorney about your rights, as the time to file an individual lawsuit is limited.

You can opt out by completing the form at the end of this Notice, or by sending a written request for exclusion to the Settlement Administrator at: Exclusion Requests – *Ridenour and Halem v. Multi-Color Corporation and Sterling Infosystems, Inc.*, Civil Action No. 2:15-cv-41, Ridenour and Halem v. Multicolor Corp and Sterling Infosystems, Inc., c/o Settlement Administrator – EXCLUSION REQUEST, P.O. Box 23648, Jacksonville, FL 32241-3648. Your written request must include your original signature, current postal address, and a specific statement that you want to be excluded from the Settlement Class. Opt Outs must be postmarked no later than June 16, 2017.

You will not receive any monetary payments from the Settlement if you exclude yourself.

8. Do I have a lawyer in this case and how will the lawyers be paid?

The Class Representatives retained **Leonard A. Bennett, Susan M. Rotkis, and Craig C. Marchiando**, Consumer Litigation Associates, P.C., 763 J. Clyde Morris Blvd., Suite 1-A, Newport News, VA 23601; **Kristi Kelly and Andrew Guzzo**, Kelly & Crandall, PLC, 4084 University Dr. #202a, Fairfax, VA 22030; **James A. Francis and David A. Searles**, Francis & Mailman, P.C., 100 South Broad Street, Suite 1902, Philadelphia, PA 19110; and **Scott Surovell**, Surovell Isaacs Peterson & Levy, PLC, 4010 University Drive, Second Floor, Fairfax, VA 22030, to represent them. In connection with the preliminary approval of the Settlement, the Court appointed these attorneys to represent you and other Class Members. Together, the lawyers are called Class Counsel. You will not be separately charged by these lawyers for their work on the case. If you want to be represented by your own lawyer, you may hire one at your own expense.

Class Counsel will ask the Court for an award of attorneys’ fees and costs of an amount not to exceed 33% of the Settlement Fund to be paid by Sterling, which Sterling has agreed not to oppose. However, the Court may ultimately award less than the amount requested. The costs of this notice to you and the costs of administering the settlement are paid by Sterling and will not reduce the settlement received by class members, unless such administration costs exceed \$200,000. Additionally, the Class Representatives will ask the Court to approve a payment to Jeffrey Ridenour and Amin Halem in an amount not to exceed \$5,000 each, as a service award for their efforts and time expended in prosecuting this case. However, the Court may ultimately award less than this amount or nothing at all.

9. How do I tell the court that I do not like the settlement?

If you are a Settlement Class Member and do not exclude yourself from the Settlement, you can object if you think any part of the Settlement is unfair, unreasonable, and/or inadequate. If you choose to object, you can and should explain the detailed reasons why you think the Court should not approve the Settlement. The Court and Class Counsel will consider your views carefully. To object, you must send a letter stating that you object to the Settlement in the *Ridenour and Halem v. Multi-Color Corporation and Sterling Infosystems, Inc.* case. Be sure to include (1) the name of this Lawsuit, *Ridenour and Halem v. Multi-Color Corporation and Sterling Infosystems, Inc.*, Civil Action No 2:15-cv-41; (2) your full name, current address and telephone number; (3) a sentence stating that to the best of your knowledge, you are a member of the settlement class; and (4) the factual basis and legal grounds for the objection to the Settlement. Mail this Objection to the Court at the address below so that it is postmarked no later than June 16, 2017. Objections to the Class Counsel’s attorneys’ fees or the requested service awards may be supplemented up to seven (7) days after the filing of a motion for such fees or awards to address additional information or materials in that motion.

**Clerk of the Court
United States District Court
600 Granby Street
Norfolk, VA 23510**

There are additional requirements necessary for your attorney if you retain one. These requirements are stated in the Settlement Agreement and Preliminary Approval Order available at www.SterlingVirginiaSettlement.com.

ADDITIONAL INFORMATION ABOUT THE LAWSUIT, THE SETTLEMENT, AND YOUR RIGHTS IS ON THE SETTLEMENT WEBSITE, www.SterlingVirginiaSettlement.com. You can call (757) 930-3660 or (703) 424-7730, or write to the Class Counsel, **Leonard A. Bennett**, Consumer Litigation Associates, P.C., 763 J. Clyde Morris Blvd., Suite 1-A, Newport News, VA 23601, or by e-mail at len@clalegal.com.

PLEASE DO NOT CALL THE COURT, THE CLERK, OR STERLING’S COUNSEL REGARDING THIS SETTLEMENT.

Exclusion-Request – Ridenour and Halem v. Multi-Color Corporation and Sterling Infosystems, Inc. Civil Action No. 2:15-cv-41

RECEIVE NO SETTLEMENT BENEFITS

(If you choose this option, you will not receive a settlement check)

To exclude yourself from the Settlement, you must either complete the attached Exclusion Request, selecting “I do not want to be part of the Class in *Ridenour and Halem v. Multi-Color Corporation and Sterling Infosystems, Inc.*, Civil Action No. 2:15-cv-41” where indicated, or send a letter stating that you want to be excluded from the Settlement of the *Ridenour and Halem v. Multi-Color Corporation and Sterling Infosystems, Inc.*, case. Be sure to include: (1) the name of the Lawsuit, *Ridenour and Halem v. Multi-Color Corporation and Sterling Infosystems, Inc.*, No. 2:15-cv-4; (2) your name; (3) your address; (4) your signature, and (5) a specific statement that you want to be excluded from the Settlement in *Ridenour and Halem v. Multi-Color Corporation and Sterling Infosystems, Inc.*

You must mail your Exclusion Request so that it is postmarked no later than June 16, 2017 to:

Settlement Administrator, Exclusion Request, P.O. Box 23648, Jacksonville, FL 32241-3648

EXCLUSION REQUEST

Ridenour and Halem v. Multi-Color Corporation and Sterling Infosystems, Inc., Civil Action No. 2:15-cv-41

FILL OUT AND RETURN THIS FORM ONLY IF YOU WISH TO EXCLUDE YOURSELF FROM THE SETTLEMENT. IF YOU WISH TO PARTICIPATE IN THE SETTLEMENT AND RECEIVE A SETTLEMENT CHECK, DO NOT RETURN THIS FORM.

I do not want to be part of the Class in *Ridenour and Halem v. Multi-Color Corporation and Sterling Infosystems, Inc.*, Civil Action No. 2:15-cv-41

Full Name: _____

Current Address: _____

Signature: _____