IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA
Sandra Reyes v. TA Fintech Inc. d/b/a TradeAlgo,
Case No. 2026-001915-CA-01

If (from February 24, 2022 through February 24, 2026) you received more than one text message, within any 12-month period, from TradeAlgo, selling its products or services after opting out, or while your number was listed on the National Do Not Call Registry ("DNC"), you could get a payment from a class action settlement.

A state Court authorized this Notice. This is not a solicitation from a lawyer.

- Defendant TA Fintech Inc. ("TradeAlgo") has agreed to make available up to $5,250,000 (the "Settlement Fund") to pay Settlement Class Members who submit valid Claim Forms, as well as Notice and Administrative Costs, any Attorneys' Fees and Expenses awarded by the Court, and any Service Awards approved for the Class Representatives. Eligible persons ("Settlement Class Members") who file a valid Claim Form will receive up to $50.10 per Settlement Class Member. Settlement Class Members may only submit one Claim Form to receive a Claim Settlement Payment.
- TradeAlgo is a fintech services company headquartered in New York.
- The Settlement resolves a lawsuit involving allegations that Settlement Class Members received text messages sent by or on behalf of TradeAlgo within any 12-month period after the person communicated that they did not wish to receive text messages by replying to the messages with a "stop" or similar opt-out instruction, or while their telephone numbers were listed on the DNC Registry, in alleged violation of the Telephone Consumer Protection Act ("TCPA") and/or the Florida Telephone Solicitation Act ("FTSA"). TradeAlgo denies all allegations of wrongdoing in the lawsuit. As part of the proposed Settlement, TradeAlgo does not admit to any wrongdoing and continues to deny the allegations against it. The Court has not decided who is correct.
- Your legal rights are affected whether you act, or do not act. Read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:	
SUBMIT A CLAIM FORM BY JANUARY 25, 2027	This is the only way to receive a Claim Settlement Payment. Give up the right to ever be part of any other lawsuit against TradeAlgo about the telemarketing legal claims released in this lawsuit.
EXCLUDE YOURSELF BY DECEMBER 9, 2026	Get no payment. This is the only option that allows you to be part of any other lawsuit against TradeAlgo about the telemarketing legal claims released in this lawsuit.
OBJECT BY DECEMBER 9, 2026	Write to the Court explaining why you do not like the Settlement.
ATTEND A HEARING ON JANUARY 8, 2027	Ask to speak in Court about the fairness of the Settlement.
DO NOTHING	Get no payment. Give up the right to ever be part of any other lawsuit against TradeAlgo about the telemarketing legal claims released in this lawsuit.

BASIC INFORMATION

The purpose of this Notice is to let you know that a proposed Settlement has been reached in the above class action lawsuit. You have legal rights and options that you may act on before the Court decides whether to approve the proposed Settlement. Because your legal rights will be affected by this Settlement, it is extremely important that you read this Notice carefully. This Notice summarizes the Settlement and your legal rights under it.

In a class action, one or more people, called class representatives, sue on behalf of people who have similar claims. All of these people are a class, or class members. One court resolves the issues for all class members, except those who exclude themselves from the classes. Here, the Class Representatives allege that TradeAlgo violated the TCPA and FTSA by sending more than one text message, from February 24, 2022 through February 24, 2026, within any 12-month period concerning TradeAlgo's products and services to cellular telephone numbers after its customers had opted out from receiving such solicitations or while their telephone numbers were listed on the DNC Registry and they did not provide their consent to be contacted. The Court has certified three classes for settlement purposes only (the "Settlement Classes"). The Honorable Robert Watson of the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (the "Court") oversees this class action. TradeAlgo denies that it did anything wrong and denies that this lawsuit should be certified as a class action in litigation. The Court has not decided who is correct.

THE SETTLEMENT

The Court did not decide in favor of Plaintiff or TradeAlgo on TradeAlgo's alleged liability under the TCPA and FTSA. Instead, both sides agreed to a settlement of the legal claims in the complaint to avoid the cost of a trial and the risk and uncertainty of proceeding forward in the lawsuit, and to provide compensation for Settlement Class Members. The Class Representatives and Class Counsel believe that the Settlement is in the best interests of the Settlement Classes.

WHO ARE MEMBERS OF THE SETTLEMENT CLASSES?

You may be in one or more of the following "Settlement Classes":

> **TCPA "STOP" Class**: From February 24, 2022 through February 24, 2026, all persons in the United States who (1) were sent more than one text message by or on behalf of Defendant within any 12-month period; (2) regarding Defendant's goods or services, to said person's cellular telephone number; and (3) where the person communicated to Defendant that they did not wish to receive text messages by replying to the messages with a "stop" or similar opt-out instruction.
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> **FTSA "STOP" Class**: From February 24, 2022 through February 24, 2026, all persons in Florida who (1) were sent more than one text message by or on behalf of Defendant; (2) regarding Defendant's goods or services, to said person's cellular telephone number; and (3) after the person texted Defendant with the message "stop" at least 15 days prior to the text message sent by or on behalf of Defendant.
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> **TCPA "DNC" Class**: All persons in the United States who from February 24, 2022 through February 24, 2026 (1) were sent a text message by or on behalf of Defendant; (2) more than one time within any 12-month period; (3) where the person's telephone number had been listed on the National Do Not Call Registry for at least thirty days; (4) for the purpose of selling Defendant's products and services; and (5) for whom Defendant claims (a) it did not obtain prior express written consent, or (b) it obtained prior express written consent in the same manner as Defendant claims it supposedly obtained prior express written consent to call the Plaintiff.

If you received Notice regarding this Settlement via email or postcard, it is because your number was texted by TradeAlgo and therefore you may be a member of one or more of the Settlement Classes. If you have questions about whether you are in the Settlement Classes, you may call **(833) 319-1315** or visit **www.TradeAlgoTCPASettlement.com** for more information.

THE SETTLEMENT BENEFITS – WHAT YOU GET

TradeAlgo agrees to make up to $5,250,000 available to (i) pay Settlement Class Members who submit valid Claim Forms; (ii) pay Notice and Administrative Costs; (iii) pay Attorneys' Fees and Expenses awarded to Class Counsel; and (iv) and any Service Awards approved for the Class Representatives. Settlement Class Members who submit a timely, valid, complete, and verified Claim Form will receive a Claim Settlement Payment of **up to $50.10** per Settlement Class Member for members of each of the Settlement Classes. Settlement Class Members may only submit one Claim Form to receive a Claim Settlement Payment. If the Settlement Fund is insufficient to pay $50.10 for each Settlement Class Member for all approved Claims, the per-person amount will be uniformly reduced on a *pro rata* basis so that the total of all payments, together with any Court-approved Attorneys' Fees and Expenses, Notice and Administrative Costs, and any Service Awards, does not exceed the Settlement Fund. In other words, your Claim Settlement Payment could decrease depending on the number of valid Claim Forms Settlement Class Members submit and the amount of the Settlement Fund available to pay Claims. If, after all distributions are made, any money remains in the Settlement Fund, then the Administrator will return the remaining money in the Settlement Fund to TradeAlgo.

HOW YOU GET A PAYMENT – SUBMITTING A CLAIM FORM

To qualify for Claim Settlement Payment, you must submit a valid Claim Form by **January 25, 2027**. There are multiple ways to submit a Claim Form. You may submit a Claim Form online by going to the Settlement Website at **www.TradeAlgoTCPASettlement.com** and following the directions found there. Claim Forms must be submitted online no later than **11:59 p.m. ET on January 25, 2027**. A copy of the paper Claim Form can be downloaded from the Settlement Website. You may also request a copy be mailed to you by calling the Administrator at **(833) 319-1315**. Read the instructions on the Claim Form carefully, fill out the form, sign it, and mail it **postmarked** no later than **January 25, 2027**.

The Court will hold a Final Approval Hearing at **9:00 a.m. ET,** on **January 8, 2027**, to decide whether to approve the Settlement. If the Settlement is approved, appeals may still follow. It is always uncertain whether these appeals can be resolved and resolving them can take more than a year. No payments will be made until the Court approves the Settlement at the Final Approval Hearing and all appeals are final. Please be patient.

Unless you submit a Request for Exclusion, you will remain in the Settlement Class(es) as a Settlement Class Member. That means you cannot sue, continue to sue, or be part of any other lawsuit against TradeAlgo regarding any text messages received from TradeAlgo from February 24, 2022, through February 24, 2026, including, but not limited to, claims asserted in the lawsuit or arising out of the facts and circumstances asserted in the lawsuit. If the Settlement is approved and becomes final and not subject to appeal, then you and all Settlement Class Members will release all "Released Claims" against all "Released Parties." It also means that all of the Court's orders will apply to you and legally bind you. The Settlement Agreement (available at **www.TradeAlgoTCPASettlement.com**) describes the legal claims you are releasing (the "Released Claims") and against whom you are releasing legal claims ("Released Parties") in detail, so read it carefully. To summarize, the Releases include, but are not limited to, TCPA and FTSA claims arising out of or related to any text messages received from TradeAlgo during the Class Period, including claims related to text messages sent to telephone numbers on the National Do Not Call Registry, text messages sent after opt-out requests, and any other federal or state telemarketing laws.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want a payment from this Settlement, but you want to keep the right to sue or continue to sue TradeAlgo, then you must take steps to remove yourself from the Settlement Classes. This is called excluding yourself—or is sometimes referred to as "opting out" of the Settlement Classes. To submit a Request for Exclusion from the Settlement, you must send a letter saying that you want to be excluded from the *Sandra Reyes v. TA Fintech Inc. d/b/a TradeAlgo,* Case No. 2026-001915-CA-01, Settlement. Your request must also include: (1) your name, address and telephone number; (2) your current phone number and any telephone number(s) at which you received a text message from TradeAlgo; (3) a statement that you wish to be excluded from the Settlement Class(es) in this lawsuit; and (4) your signature. You must mail your Request for Exclusion, **postmarked** no later than **December 9, 2026,** to the address below:

Reyes v. TA Fintech Inc. d/b/a TradeAlgo
c/o Kroll Settlement Administration LLC
ATTN: Requests for Exclusion
P.O. Box 5324
New York, NY 10150-5324

You cannot exclude yourself on the phone or by fax or email. If you ask to be excluded, you will not get a Claim Settlement Payment, and you cannot object to the Settlement. You will not be legally bound by anything that happens in this lawsuit. Mass Requests for Exclusion are not allowed.

THE LAWYERS REPRESENTING YOU

The Court has appointed Christopher Berman of Shamis & Gentile, P.A., Scott Edelsberg of Edelsberg Law, P.A., Garrett Berg of Garrett Berg Law, P.A., and Christopher Gold of Gold Law, PA to represent you and other Settlement Class Members. These lawyers are called Class Counsel. You will not be personally charged by these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense. Class Counsel will ask the Court to approve payment of up to 30% ($1,575,000) of the $5,250,000 Settlement Fund. This payment will compensate Class Counsel for investigating the facts, litigating the lawsuit, and negotiating the Settlement. Class Counsel also will request a Service Award of up to $5,000 for each of the named Plaintiffs to compensate for the time and effort in pursuing this lawsuit on behalf of the Settlement Classes. The Court may award less than these amounts.

OBJECTING TO THE SETTLEMENT

If you are a Settlement Class Member and do not exclude yourself from the Settlement Class(es), you may object to the Settlement if you do not like any part of it. You may give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must file a written objection with the Court and mail a copy to the Administrator. The written objection must contain information sufficient to allow the parties to confirm that you are a member of the Settlement Class(es), including:

1) The case name and number: *Sandra Reyes v. TA Fintech Inc. d/b/a TradeAlgo,* Case No. 2026-001915-CA-01;
2) Your full name, address, telephone number, and personal signature;
3) Information sufficient to confirm that you are a Settlement Class Member, including the telephone number at which you received a text message from TradeAlgo;
4) A statement of your specific objections, and a detailed statement of the factual and legal basis for such objections;
5) The identity of all witnesses, including the witness's name and address, and a summary of such witness's proposed testimony and documents that you would like the Court to consider;
6) The name and contact information of any attorney you intend to have assert your objections before the Court;
7) A statement identifying the number of class action settlements you and/or your attorney objected to in the last five years, listing those cases by case name and number, and a copy of any orders related to or ruling on the objection(s); and
8) A statement indicating whether you and/or your attorney(s) intend to appear at the Final Approval Hearing. If your attorney intends to appear at the Final Approval Hearing, they must enter a written Notice of Intention to Appear by Counsel with the Clerk of the Court no later than the date set by the Court in its Preliminary Approval Order and include the full caption and case number of each previous class action case in which such counsel has represented an objector. If you are represented by counsel and your counsel intends to speak at the Final Approval Hearing, the written objection must include a detailed statement of the specific legal and factual basis for each and every objection, and a detailed description of any and all evidence you may offer at the Final Approval Hearing, including copies of any and all exhibits that you may introduce at the Final Approval Hearing.

You must file the objection with the Court no later than **December 9, 2026**.

Clerk of the Court
Re: *Sandra Reyes v. TA Fintech Inc. d/b/a TradeAlgo*
Case No. 2026-001915-CA-01
Osvaldo N. Soto Miami-Dade Justice Center
20 NW 1st Avenue
Miami, FL 33128

Also, you must send your objection to the Administrator **postmarked** no later than **December 9, 2026**, at:

Reyes v. TA Fintech Inc. d/b/a TradeAlgo
c/o Kroll Settlement Administration LLC
ATTN: Objections
P.O. Box 5324
New York, NY 10150-5324

Objecting simply means telling the Court that you do not like something about the Settlement. You can object only if you stay in the Settlement Classes. Excluding yourself from the Settlement Classes is telling the Court that you do not want to be part of the Settlement Classes. If you exclude yourself, you have no basis to object because the lawsuit no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

The Court will hold the Final Approval Hearing on **January 8, 2027**, at **9:00 a.m. ET**, before the Honorable Robert Watson of the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, via Zoom teleconference, at the Osvaldo N. Soto Miami-Dade Justice Center, 20 NW 1st Ave., Courtroom 13-B, Miami, FL 33128. The purpose of the hearing is for the Court to determine whether the Settlement is fair, reasonable, adequate, and in the best interests of the Settlement Classes. At the hearing, the Court will hear any objections and arguments concerning the fairness of the proposed Settlement, including those related to the amount requested by Class Counsel for Attorneys' Fees and Expenses and Service Awards to the Class Representatives. After the hearing, the Court will decide whether to approve the Settlement. It is unknown how long these decisions will take.

Note: The date and time of the Final Approval Hearing is subject to change by Court Order. Any changes will be posted on the Settlement Website, **www.TradeAlgoTCPASettlement.com**.

DO I HAVE TO ATTEND THE FINAL APPROVAL HEARING?

No. Class Counsel will answer any questions the Court may have. But you are welcome to attend the hearing at your own expense. If you send an objection, you do not have to attend the hearing to talk about it. As long as your written objection was filed by the deadline, and meets the other criteria described above and in the Settlement Agreement, the Court will consider it. You may also pay a lawyer to attend, but you do not have to. If you do not exclude yourself from the Settlement Classes, you may ask the Court for permission to speak at the hearing concerning any part of the proposed Settlement Agreement. If you filed an objection and intend to appear at the hearing, you must state your intention to do so in your objection. To speak, you must state that in your objection. Be sure to include your name, address, telephone number, that you are a Settlement Class Member, and your signature. You cannot speak at the hearing if you exclude yourself.

IF YOU DO NOTHING

If you do nothing, you will get no money from this Settlement. Unless you exclude yourself, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against TradeAlgo about the legal issues released in this lawsuit.

GETTING MORE INFORMATION

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement, which is available for review on the Settlement Website at **www.TradeAlgoTCPASettlement.com**. For more information, you may call toll-free **(833) 319-1315**, write to *Reyes v. TA Fintech Inc. d/b/a TradeAlgo*, c/o Kroll Settlement Administration LLC, P.O. Box 5324, New York, NY 10150-5324, or visit the Settlement Website at **www.TradeAlgoTCPASettlement.com**, where you will find answers to common questions about the Settlement, a Claim Form, and other information to help you determine whether you are a member of the Settlement Classes.

PLEASE DO NOT CONTACT THE COURT, THE JUDGE, OR TRADEALGO WITH QUESTIONS ABOUT THE SETTLEMENT OR CLAIMS PROCESS.