

**If You Have or Had an Account with One Nevada Credit Union,  
You May be Eligible for a Payment from a Class Action Settlement.**

*A federal court authorized this notice. This is not a solicitation from a lawyer.*

- A \$600,000 Settlement has been reached with One Nevada Credit Union (“One Nevada”) in a lawsuit alleging that One Nevada violated the Fair Credit Reporting Act (“FCRA”) by accessing consumer credit reports to conduct “Account Review Inquiries” of One Nevada customers. One Nevada denies any liability or wrongdoing. The Court has not decided which side is right.
- Consumers on certain One Nevada accounts may be eligible for a payment from the Settlement Fund.
- If the below criteria are met, you may be entitled to receive payment from the Settlement Fund:
  - You were a member of One Nevada on or after September 13, 2011; AND
  - You timely submit a Claim Form.
- Your legal rights are affected whether you act or don’t act. Please read this notice carefully.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
<b>SUBMIT A CLAIM FORM FOR A PAYMENT</b>	By submitting a Claim Form, Settlement Class Members will be eligible to receive payments based on One Nevada Account Review Inquiries.
<b>EXCLUDE YOURSELF</b>	Get no benefits from the Settlement. This is the only option that allows you to participate in any other lawsuit against One Nevada about the claims in this case.
<b>OBJECT</b>	Write to the Court if you don’t like the Settlement.
<b>GO TO A HEARING</b>	Ask to speak in Court about the fairness of the Settlement.
<b>DO NOTHING</b>	You will not receive a payment, and you will give up your right to participate in further litigation against One Nevada about the claims in this case.

- These rights and options – **and the deadlines to exercise them** – are explained in this notice.
- The Court in charge of this case still has to decide whether to approve the Settlement. If it does, and any appeals are resolved, benefits will be distributed to those who qualify. Please be patient.

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## BASIC INFORMATION

### 1. Why is there a notice?

A Court authorized this notice because you have a right to know about the 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. This notice explains the lawsuit, the Settlement, and your legal rights.

Judge Gloria M. Navarro of the United States District Court for the District of Nevada is overseeing this case. This litigation is known as *Smith v. One Nevada Credit Union*, D. Nev. Case No. 2:16-cv-02156-GMN-NJK. The person who sued is called the “Plaintiff.” One Nevada is the “Defendant.”

### 2. What is this litigation about?

The lawsuit concerns whether One Nevada accessed consumer credit reports to conduct Account Review Inquiries of One Nevada customers (*see* Question 6).

The complaint in the lawsuit is posted on the website [www.CUFCRASettlement.com](http://www.CUFCRASettlement.com) and contains all of the allegations and claims asserted against One Nevada. One Nevada denies any liability or wrongdoing.

### 3. What is an Account Review Inquiry?

An Account Review Inquiry means a request by One Nevada for an individual’s Consumer Report (as defined in the FCRA, 15 U.S.C. § 1681a(d), including, without limitation, credit reports, credit scores, and other information derived from a consumer report). This definition excludes prescreening inquiries made by One Nevada pursuant to the “firm offer of credit or information” provision of the FCRA, 15 U.S.C. § 1681b(c)(1)(B), and excludes inquiries made by One Nevada for collection of a debt due and owing to One Nevada which has not been discharged in bankruptcy.

### 4. Why is this a class action?

In a class action, one or more people called “Class Representatives” (in this case, a One Nevada account holder) sue on behalf of themselves and other people with similar claims. Together, all the people with similar claims (except those who exclude themselves) are members of a “Settlement Class.”

### 5. Why is there a Settlement?

The Court has not decided in favor of the Plaintiff or One Nevada. Instead, both sides have agreed to a Settlement. By agreeing to the Settlement, the Parties avoid the costs and uncertainty of a trial, and Settlement Class Members receive the benefits described in this notice. The proposed Settlement does not mean that any law was broken or that One Nevada did anything wrong. One Nevada denies all claims in this case. The Class Representative and his lawyers think the proposed Settlement is best for everyone who is affected.

## WHO IS PART OF THE SETTLEMENT?

If you received notice of the Settlement by a postcard addressed to you, then you are a Settlement Class Member. But even if you did not receive a postcard, you may be a Settlement Class Member, as described below.

### 6. Who is included in the Settlement?

You are a member of the Settlement Class if you were a member of One Nevada on or after September 13, 2011.

### 7. What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are in the Settlement Class, or have any other questions about the Settlement, visit the Settlement website at [www.CUFCRASettlement.com](http://www.CUFCRASettlement.com) or call the toll-free number, 1-866-545-7418. You may also send questions to the Settlement Administrator at [info@CUFCRASettlement.com](mailto:info@CUFCRASettlement.com) or One Nevada FCRA Settlement, c/o KCC Class Action Services, P.O. Box 404091, Louisville, KY 40233-4091.

## THE SETTLEMENT BENEFITS

### 8. What does the Settlement provide?

If the Settlement is approved and becomes final, it will provide benefits to Settlement Class Members. One Nevada will pay \$600,000 to a Settlement Fund to make payments to eligible Settlement Class Members, as well as to pay for the Class Counsel’s fees, costs and expenses incurred by Class Counsel the costs of notice and to administer the Settlement, and a service payment to the Class Representative who initiated the lawsuit (*see* Question 18). If there are any funds remaining in the Settlement Fund after payments are made to Settlement Class Members, any remaining funds will be distributed to a nonprofit organization or organizations agreed upon by Class Counsel and One Nevada and approved by the Court.

**9. How much will my payment be?**

The Settlement Fund – less those amounts paid to Class Counsel and the Class Representative, and the costs of notice and administering the Settlement – will be distributed in equal amounts to each Settlement Class Member who files a valid claim.

**10. When will I receive my payment?**

Settlement Class Members who submit valid claims will receive their payments, by check, only after the Court grants final approval to the Settlement and after any appeals are resolved (*see* “The Final Approval Hearing” below). If there are appeals, resolving them can take time. Please be patient.

**11. What am I giving up to stay in the Settlement Class?**

Unless you exclude yourself from the Settlement, you will be a Settlement Class Member and be bound by the Settlement. This means that you can’t sue One Nevada in court, or bring a claim against One Nevada through the arbitration process, or be part of any other lawsuit or arbitration against One Nevada for any claim based on the same factual basis as those resolved by this Settlement. (Arbitration is a process between consumers and businesses that uses a neutral person to resolve a dispute.) If you do not exclude yourself, the Settlement Agreement and all decisions by the Court will bind you.

The Settlement Agreement is available at [www.CUFCRASettlement.com](http://www.CUFCRASettlement.com) and describes the claims that you give up if you remain in the Settlement.

**HOW TO RECEIVE A PAYMENT**

**12. How can I receive a payment?**

To receive a payment, you must submit a claim. You can submit a claim online or by mail. You can view and print a paper Claim Form at [www.CUFCRASettlement.com](http://www.CUFCRASettlement.com). For any Claimant who did not receive the Mail Notice, they must submit an attestation that, to the best of the Claimant’s knowledge, the Claimant fits within the Settlement Class. The Claimant must provide a One Nevada account number so that the event can be verified by One Nevada.

Paper claims must be mailed to:

One Nevada FCRA Settlement  
c/o KCC Class Action Services  
P.O. Box 404091  
Louisville, KY 40233-4091

Claims must be postmarked or uploaded to the website no later than **January 24, 2019**.

**13. How will my claim be decided?**

After you submit your claim, the Settlement Administrator will confirm whether you are a Settlement Class Member and therefore entitled to a payment. If your application is incomplete or does not establish that you are entitled to a payment, the Settlement Administrator will notify you to correct any problems with your claim. If you do not correct the problems, your claim will be denied.

The Settlement Agreement, available at [www.CUFCRASettlement.com](http://www.CUFCRASettlement.com), provides more detail on how claims will be decided.

**EXCLUDING YOURSELF FROM THE SETTLEMENT**

If you don’t want benefits from the Settlement, and you want to keep the right to sue or proceed in arbitration against One Nevada about the legal issues in this case, then you must take steps to get out of the Settlement. This is called excluding yourself – or it is sometimes referred to as “opting out” of the Settlement Class.

**14. How do I exclude myself from the Settlement?**

To exclude yourself from the Settlement, you must send a letter or other written document by mail to the Settlement Administrator. Your request must include:

- Your name and address;
- A statement that you want to be excluded from the One Nevada Settlement in *Smith v. One Nevada Credit Union*, Case No. 2:16-cv-02156-GMN-NJK; and
- Your signature.

You must mail your exclusion request, postmarked no later than **January 24, 2019**, to One Nevada FCRA Settlement, c/o KCC Class Action Services, P.O. Box 404091, Louisville, KY 40233-4091. You cannot ask to be excluded on the phone, by email, or at the website.

**15. If I do not exclude myself, can I sue One Nevada for the same thing later?**

No. Unless you exclude yourself, you give up the right to sue One Nevada for any claims based on the same factual basis as those resolved by this Settlement. You must exclude yourself from the Settlement Class in order to maintain your own lawsuit.

**16. If I exclude myself, can I still get a payment?**

No. You will not get a payment if you exclude yourself from the Settlement.

**THE LAWYERS REPRESENTING YOU**

**17. Do I have a lawyer in the case?**

The Court has appointed the following lawyers as Class Counsel to represent all Settlement Class Members. They are:

Abbas Kazerounian, Esq. KAZEROUNI LAW GROUP 245 Fischer Avenue, Suite D1 Costa Mesa, CA 92626 Tel. (800) 400-6808	David H. Krieger, Esq. HAINES & KRIEGER, LLC 8985 S. Eastern Avenue, Suite 350 Henderson, NV 89123 Tel. (702) 880-5554
Michael Kind, Esq. KAZEROUNI LAW GROUP 6069 S. Fort Apache Rd., Suite 100 Las Vegas, NV 89148 Tel. (800) 400-6808	

You will not be charged for contacting these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

**18. How will the lawyers be paid?**

Class Counsel intend to request up to 30% of the Settlement Fund for attorneys' fees and expenses of prosecuting the class action. The fees and expenses awarded by the Court will be paid out of the Settlement Fund. The Court will decide the amount of fees to award. Class Counsel will also request that a service payment of up to \$5,000 be paid from the Settlement Fund to the Class Representative for his service as representative of the whole Settlement Class.

**OBJECTING TO THE SETTLEMENT**

**19. How do I tell the Court if I do not like the Settlement?**

If you are a member of the Settlement Class, you can object to any part of the Settlement, the Settlement as a whole, Class Counsel's requests for fees and expenses, and/or the service payment to the Class Representative. To object, you must submit a letter that includes the following:

- The name of the litigation;
- Your name, address, and telephone number and, if you did not receive the mailed notice, documents to demonstrate that you are a Settlement Class Member;
- An explanation of the basis upon which you claim to be a Settlement Class Member;
- The reasons you object to the Settlement, along with any supporting materials;
- The identity of all counsel who represent you and which, if any, will appear at the Final Approval Hearing on your behalf;
- A statement regarding whether you will appear and/or testify at the Final Approval Hearing (and any other person who will be called to testify regarding your objection); and
- Your signature (an attorney's signature is not sufficient).
- A list of all other objections to other class settlements and consideration paid to resolve them.

The requirements to object to the Settlement are described in detail in Section 7 of the Settlement Agreement in paragraphs 50-52. You must electronically file with the Court or mail your objection to each of the following four addresses, and your objection must be postmarked by **January 24, 2019**:

Clerk of the Court  
U.S. District Court  
for the District of Nevada  
333 Las Vegas Blvd. South  
Las Vegas, NV 89101

Abbas Kazerounian, Esq.  
KAZEROUNI LAW GROUP  
245 Fischer Avenue, Suite D1  
Costa Mesa, CA 92626  
Tel. (800) 400-6808

David H. Krieger, Esq.  
HAINES & KRIEGER, LLC  
8985 S. Eastern Ave., Suite 350  
Henderson, NV 89123  
Tel. (702) 880-5554

Michael Kind, Esq.  
KAZEROUNI LAW GROUP  
6069 S. Fort Apache Rd, Suite 100  
Las Vegas, NV 89148  
Tel. (800) 400-6808

**20. What is the difference between objecting and asking to be excluded?**

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement *only if you do not exclude yourself*. Excluding yourself is telling the Court that you do not want to be part of the Settlement. If you exclude yourself, you have no basis to object to the Settlement because it no longer affects you.

**THE FINAL APPROVAL HEARING**

The Court will hold a hearing to decide whether to approve the Settlement and any requests for Class Counsel's fees and expenses, as well as for the service payment to the Class Representative. You may attend and you may ask to speak, but you don't have to do so.

**21. When and where will the Court decide whether to approve the Settlement?**

The Court has scheduled a Final Approval Hearing on **March 5, 2019** at 11:00 a.m. at the United States District Court for the District of Nevada, Las Vegas Courthouse, located at 333 Las Vegas Blvd. South, Courtroom 7D, Las Vegas, Nevada 89101. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check [www.CUFCRASettlement.com](http://www.CUFCRASettlement.com) for updates. At this hearing the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will also consider a request by Class Counsel for attorneys' fees and expenses. If there are objections, the Court will consider them at that time. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

**22. Do I have to attend the hearing?**

No. Class Counsel will answer questions the Court may have. But you are welcome to attend the hearing at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as you submitted your written objection on time, to the proper addresses, and it complies with the other requirements described in the Settlement Agreement, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

**23. May I speak at the hearing?**

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must comply with the requirements in Question 19 above. You cannot speak at the hearing if you exclude yourself from the Settlement.

**GETTING MORE INFORMATION**

**24. How do I get more information?**

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement. For a complete, definitive statement of the Settlement terms, refer to the Settlement Agreement at [www.CUFCRASettlement.com](http://www.CUFCRASettlement.com). You may also write with questions to the Settlement Administrator at One Nevada FCRA Settlement, c/o KCC Class Action Services, P.O. Box 404091, Louisville, KY 40233-4091 or call the toll-free number, 1-866-545-7418.

**Instructions on how to access the case docket via PACER or in person at any of the Court's locations:**

The Complaint, Settlement Agreement, and this notice may be viewed at the United States District Court for the District of Nevada, Las Vegas Courthouse, located at 333 Las Vegas Blvd. South, Las Vegas, Nevada 89101, or the documents may be accessed online through the Court's electronic filing system via PACER ([www.pacer.gov](http://www.pacer.gov)).

The Case Management/Electronic Case Filing (CM/ECF) system is the Federal Judiciary's comprehensive case management system for all bankruptcy, district and appellate courts. CM/ECF allows courts to accept filings and provide access to filed documents over the Internet. The system also offers instantly updated dockets and immediate online access to new filings, which can be downloaded and printed directly from the court system. For more information, please go to <http://ecf.nvd.uscourts.gov>.

For in-person review, in order to view or retrieve documents in any format, you may access the PACER system on one of the terminals in the Records Section of any Clerk's Office location, where you may search party names to obtain a case number.

A valid government-issued picture identification card may be needed to view a paper case file or docket.