

# **NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

**Circuit Court for Lake County, Illinois, Chancery Division**

***Wittmeyer, et al. v. Heartland Alliance for Human Needs & Human Rights, Heartland Alliance Health, Heartland Alliance International, LLC, Heartland Housing, Inc., and Heartland Human Care Services, Inc.***

**Case No. 2025LA00000127**

**A Court has authorized this Long Notice (“Notice”). This is not a solicitation from a lawyer.**

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**If You Are a Person Impacted in the Data Breach that Occurred On or About January 26, 2022, You Are Eligible to Receive a Settlement Class Member Benefit from a Class Action Settlement**

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- A Court authorized this Notice, to those that are eligible to receive Settlement Class Member Benefits from a proposed class action Settlement. The Action is titled *Wittmeyer, et al. v. Heartland Alliance for Human Needs & Human Rights, Heartland Alliance Health, Heartland Alliance International, LLC, Heartland Housing, Inc., and Heartland Human Care Services, Inc.*, Case No. 2025LA00000127 and is pending in the Circuit Court for Lake County, Illinois, Chancery Division. The people that filed the class action lawsuit are called Plaintiffs or Class Representatives and the companies they sued are Heartland Alliance for Human Needs & Human Rights, Heartland Alliance Health, Heartland Alliance International, LLC, Heartland Housing, Inc., and Heartland Human Care Services, Inc. (Heartland or Defendants). Defendants deny any wrongdoing whatsoever.

- **Who is a Settlement Class Member?**

All Persons impacted in the Data Breach that occurred on or about January 26, 2022.

Excluded from the Settlement Class are Defendants and their parents or subsidiaries, any entities in which they have a controlling interest, as well as their officers, directors, affiliates, legal representatives, heirs, predecessors, successors, and assigns. Also excluded are any Judge to whom this case is assigned as well as their judicial staff, immediate family members and Settlement Class Members who timely and validly exclude themselves from the Settlement.

- Settlement Class Members under the Settlement Agreement will be eligible to receive one or more of the following:

- ❖ **Compensation for Documented Ordinary Losses:** All Settlement Class Members who submit a Valid Claim, **including necessary supporting documentation**, are eligible for the following documented Ordinary Losses, **not to exceed \$1,000** per Settlement Class Member;

- ❖ **Compensation for Documented Extraordinary Losses for a Victim of Actual Identity Theft:** All Settlement Class Members who were the victim of actual documented identity theft and submit a Valid Claim, **including necessary supporting documentation**, are eligible for the following compensation for Extraordinary Losses, **not to exceed \$5,000** per Settlement Class Member, for proven monetary loss as a

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result of actual identity theft;

- ❖ **Reimbursement for Lost Time:** Settlement Class Members are also eligible to receive reimbursement for up to **three (3) hours of lost time** that they attest they spent responding to issues raised by the Data Breach (calculated **at the rate of \$22.50 per hour**), but only if they spent at least one full hour dealing with the Data Breach.

**AND**

- ❖ **Identity Theft Protection and Credit Monitoring** – Settlement Class Members may submit a Claim to accept **two (2) years of three bureau credit monitoring services**. Defendants will pay for the monitoring services separate and apart from other Settlement Class Member Benefits.

Defendants shall not be required to provide double payment for the same loss or injury that was reimbursed or compensated by any other source. No payment shall be made for emotional distress, personal/bodily injury, or punitive damages, as all such amounts are not recoverable.

- To obtain more information visit **www.heartlanddatasettlement.com** or call **(833) 890-5635**.

**Please read this Notice carefully. Your legal rights will be affected, and you have a choice to make at this time.**

	<b>Summary of Legal Rights</b>	<b>Deadline(s)</b>
<b>Submit a Claim Form</b>	The only way to receive a Settlement Class Member Benefit from the Settlement.	Submitted or postmarked on or before <b>October 30, 2025</b> .
<b>Exclude Yourself by Opting Out of the Settlement Class</b>	Receive no benefit from the Settlement. This is the only option that allows you to keep your right to bring any other lawsuit against Defendants relating to the Data Breach.	Mailed and postmarked on or before <b>September 30, 2025</b> .
<b>Object to the Settlement and/or Attend the Final Approval Hearing</b>	You can write the Court about why you agree or disagree with the Settlement or the Application for Attorneys' Fees, Costs, and Service Awards. The Court cannot order a different settlement. You can also ask to speak at the Final Approval Hearing on <b>November 19, 2025 at 9:00 a.m. CT.</b> about the fairness of the Settlement, with or without your own attorney.	Mailed and postmarked on or before <b>September 30, 2025</b> .

<b>Do Nothing</b>	You will not receive any Settlement Class Member Benefit from this class action Settlement, but will remain a Settlement Class Member and be bound by the releases.	N/A
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- Your rights and options as a Settlement Class Member – **and the deadlines to exercise your rights** – are explained in this Notice.
- The Court still will have to decide whether to approve the Settlement. Settlement Class Member Benefits will be made available only if the Court approves the Settlement and after any possible appeals are resolved.

### What This Notice Contains

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## BASIC INFORMATION

### 1. Why is there a Notice?

The Court authorized this Notice because you have a right to know about the Settlement, and all of your options, before the Court decides whether to give Final Approval to the Settlement. This Notice explains the nature of the Action that is the subject of the Settlement, the general terms of the Settlement, and your legal rights and options.

Judge Luis A. Berrones of the Circuit Court for Lake County, Illinois, Chancery Division is overseeing this case captioned as *Wittmeyer, et al. v. Heartland Alliance for Human Needs & Human Rights, Heartland Alliance Health, Heartland Alliance International, LLC, Heartland Housing, Inc., and Heartland Human Care Services, Inc.*, Case No. 2025LA00000127. The people who brought the lawsuit are called the Class Representatives. The companies being sued, Heartland Alliance for Human Needs & Human Rights, Heartland Alliance Health, Heartland Alliance International, LLC, Heartland Housing, Inc., and Heartland Human Care Services, Inc., are called Heartland or the Defendants.

### 2. What is the Action about?

The Action alleges that on or about January 26, 2022, an unknown and unauthorized criminal actor gained access to Heartland's computer systems and accessed certain files containing sensitive and/or personal information about certain individuals including, depending on the individual, names, Social Security Numbers, dates of birth, driver's license numbers, financial account numbers, medical and health information, or other sensitive records.

Defendants deny any wrongdoing whatsoever. No court or other judicial body has made any judgment or other determination that Defendants have done anything wrong.

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

In a class action, one or more people called "Class Representatives" or "Plaintiffs" sue on behalf of all people who have similar claims. Together, all of these people are called a "Settlement Class," and the individuals are called "Settlement Class Members." One court resolves the issues for all Settlement Class Members, except for those who exclude themselves from the Settlement Class.

### 4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiffs or Defendants. Instead, both sides agreed to the Settlement. The Settlement avoids the cost and risk of a trial and related appeals, while providing benefits to Settlement Class Members. The Class Representatives appointed to represent the Settlement Class, and the attorneys for the Settlement Class, Class Counsel, think the Settlement is best for all Settlement Class Members.

## WHO IS IN THE SETTLEMENT?

### 5. How do I know if I am part of the Settlement?

You are affected by the Settlement and potentially a Settlement Class Member if you are a Person impacted in the Data Breach, that occurred on or about January 26, 2022.

Excluded from the Settlement Class are Defendants and their parents or subsidiaries, any entities in which they have a controlling interest, as well as their officers, directors, affiliates, legal representatives, heirs, predecessors, successors, and assigns. Also excluded are any Judge to whom this case is assigned as well as their judicial staff, immediate family members and Settlement Class Members who timely and validly exclude themselves from the Settlement.

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

If you are not sure whether you are included in the Settlement, you may call **(833) 890-5635** with questions. You may also write with questions to:

Wittmeyer v. Heartland  
c/o Kroll Settlement Administration LLC  
P.O. Box 225391  
New York, NY 10150-5391

### **THE SETTLEMENT CLASS MEMBER BENEFITS–WHAT YOU GET IF YOU QUALIFY**

#### **7. What does the Settlement provide?**

The Settlement provides the following Settlement Class Member Benefits available to Settlement Class Members who submit Valid Claims: (a) Compensation for Documented Ordinary Losses, up to \$1,000 per Settlement Class Member, with supporting documentation; (b) Compensation for Documented Extraordinary Losses for a victim of actual identity theft not to exceed \$5,000 per Settlement Class Member, with supporting documentation; (c) Reimbursement for Lost Time for up to three (3) hours of lost time spent responding to issues raised by the Data Breach (calculated at the rate of \$22.50 per hour); and (d) Identity Theft Protection and Credit Monitoring – Settlement Class Members may submit a Claim to accept two (2) years of three bureau credit monitoring services.

#### **8. What Settlement Class Member Benefits are available under the Settlement?**

Settlement Class Members that submit a valid and timely Claim Form may select one or more of the following Settlement Class Member Benefits:

- a. ***Compensation for Documented Ordinary Losses:*** All Settlement Class Members who submit a Valid Claim, including necessary supporting documentation, are eligible for the following documented Ordinary Losses, not to exceed \$1,000 per Settlement Class Member that were incurred as a result of the Data Breach:
  - (i) unreimbursed bank fees;
  - (ii) long distance phone charges;
  - (iii) cell phone charges (only if charged by the minute);
  - (iv) data charges (only if charged based on the amount of data used);
  - (v) postage;
  - (vi) gasoline for local travel;
  - (vii) unreimbursed losses due to fraud or identity theft; and
  - (viii) any other charge or loss fairly traceable to the Data Breach between January 26, 2022, and the commencement of the Notice Program.

- b. Compensation for Documented Extraordinary Losses for a Victim of Actual Identity Theft:** All Settlement Class Members who were the victim of actual documented identity theft and submit a Valid Claim, including necessary supporting documentation, are eligible for the following compensation for Extraordinary Losses, not to exceed \$5,000 per Settlement Class Member, for proven monetary loss as a result of actual identity theft if:

(i) the loss is an actual, documented, and unreimbursed monetary loss; (ii) the loss was more likely than not caused by the Data Breach; (iii) the loss occurred between January 26, 2022, and the commencement of the Notice Program; (iv) the loss is not already covered by one or more of the normal reimbursement categories; and (v) the Settlement Class Member made reasonable efforts to avoid, or seek reimbursement for, the loss, including and not limited to exhaustion of all available credit monitoring insurance and identify theft insurance.

- c. Reimbursement for Lost Time:** Settlement Class Members are also eligible to receive reimbursement for up to three (3) hours of lost time that they attest they spent responding to issues raised by the Data Breach (calculated at the rate of \$22.50 per hour), but only if they spent at least one full hour dealing with the Data Breach.

**AND**

- d. Identity Theft Protection and Credit Monitoring** – Settlement Class Members may submit a Claim to accept two (2) years of three bureau credit monitoring services. The services shall provide three-bureau monitoring for all Valid Claims and shall include (1) identity theft insurance (with a \$1,000,000 policy limit); (2) real-time credit monitoring services; and (3) access to fraud resolution agents. Settlement Class Members will need to enroll to receive this benefit. Defendants will pay for the monitoring services separate and apart from other Settlement Class Member Benefits.

Defendants shall not be required to provide double payment for the same loss or injury that was reimbursed or compensated by any other source. No payment shall be made for emotional distress, personal/bodily injury, or punitive damages, as all such amounts are not recoverable.

### **HOW DO YOU SUBMIT A CLAIM?**

#### **9. How do I get a Settlement Class Member Benefit?**

To receive a Settlement Class Member Benefit, you must complete and submit a Claim Form online at **[www.heartlanddatasettlement.com](http://www.heartlanddatasettlement.com)** or by mail to Wittmeyer v. Heartland, c/o Kroll Settlement Administration LLC, P.O. Box 225391, New York, NY 10150-5391. Read the Claim Form instructions carefully, fill out the Claim Form, provide the required documentation, and submit online by **October 30, 2025**, or by mail **postmarked by October 30, 2025**.

**TO RECEIVE AN ELECTRONIC OR ACH PAYMENT FOR YOUR VALID CLAIM, YOU  
MUST FILE A CLAIM FORM ONLINE AT  
[WWW.HEARTLANDDATASETTLEMENT.COM](http://WWW.HEARTLANDDATASETTLEMENT.COM)**

#### **10. When will I get my Settlement Class Member Benefit?**

The Court will hold a Final Approval Hearing on **November 19, 2025, at 9:00 a.m. CT** to decide whether to approve the Settlement. If the Court approves the Settlement, there may be appeals from that decision and resolving them can take time. It also takes time for all of the Claim Forms to be processed. Please be patient. Settlement payments and Credit Monitoring will begin after the Settlement has obtained Court approval and the time for all appeals has expired.

#### **11. What am I giving up as part of the Settlement?**

Defendants and its affiliates will receive a release from all claims that could have been or that were brought against Defendants relating to the Data Breach. Thus, if the Settlement becomes Final and you do not exclude yourself from the Settlement, you will be a Settlement Class Member and you will give up your right to sue Defendants' respective past or present parents, subsidiaries, divisions, and related or affiliated entities, and each of its and their respective predecessors, successors, directors, officers, principals, shareholders, partners, members, employees, agents, attorneys, insurers, and reinsurers, and includes, without limitation, any Person related to any such entity who is, was or could have been named as a defendant in this Action, other than any Person who is found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding or abetting the criminal activity occurrence of the Data Breach or who pleads *nolo contendere* to any such charge, and any other Person acting on Defendants' behalf, in its capacity as such and assigns of each of them as well as covered entities associated with the Data Breach. These releases are described in Section 6 of the Settlement Agreement, which is available at **[www.heartlanddatasettlement.com](http://www.heartlanddatasettlement.com)**. If you have any questions, you can talk to the law firms listed in **Question 15** for free or you can talk to your own lawyer.

### **EXCLUDING YOURSELF FROM THE SETTLEMENT**

If you do not want to be part of the Settlement, then you must take steps to exclude yourself from the Settlement Class. This is sometimes referred to as "opting out" of the Settlement Class.

#### **12. If I exclude myself, can I get a Settlement Class Member Benefit from this Settlement?**

No. If you exclude yourself, you will not be entitled to receive any benefits from the Settlement.

#### **13. If I do not exclude myself, can I sue the Related Entities for the same thing later?**

No. Unless you exclude yourself, you give up any right to sue Defendants and any other Related Entities for any claim that could have been or was brought relating to the Data Breach. You must exclude yourself from the Settlement to start your own lawsuit or to be part of any different lawsuit relating to the claims in this case.

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

To exclude yourself, send an opt-out request or written notice of intent to opt-out that says you want to be excluded from the Settlement. The opt-out request must include the following information:

- the name of the Action: *Wittmeyer, et al v. Heartland Alliance for Human Needs & Human Rights, Heartland Alliance Health, Heartland Alliance International, LLC,*

*Heartland Housing, Inc., and Heartland Human Care Services, Inc.*, Case No. 2025LA00000127, pending in the Circuit Court for Lake County, Illinois;

- your full name;
- current address;
- personal signature; and
- the words “Request for Exclusion” or a clear and similar statement that you do not wish to participate in the Settlement.

All Settlement Class Members who submit valid and timely notices of their intent to opt-out from the Settlement Class shall not receive any Settlement Class Member Benefits or be bound by the terms of the Settlement Agreement. Settlement Class Members who submit valid and timely notices of their intent to opt-out waive any right to object to this Settlement. All Settlement Class Members who do not opt-out of the Settlement Class shall be bound by the terms of the Settlement Agreement. You must mail your opt-out request to the Settlement Administrator **postmarked by September 30, 2025**, to:

Wittmeyer v. Heartland  
c/o Kroll Settlement Administration LLC  
P.O. Box 225391  
New York, NY 10150-5391

### **OBJECTING TO THE SETTLEMENT**

#### **15. How do I tell the Court that I do not like the Settlement?**

You can tell the Court that you do not agree with the Settlement, and/or Application for Attorneys’ Fees, Costs, and Service Awards or some part of it by objecting to the Settlement. Objections must be filed with the Clerk of the Court and copies served on Class Counsel and Defendants’ Counsel at the addresses listed below, postmarked by **no later than September 30, 2025**.

<b>Clerk of the Court</b>	<b>Defendants’ Counsel</b>	<b>Class Counsel</b>
18 N County Street Waukegan, IL 60085	Ruth E. Goldwater McCoy Jon Kardassakis Lewis Brisbois Bisgaard & Smith LLP 550 West Adams Street, Suite 300 Chicago, Illinois 60661  Jon P. Kardassakis Lewis Brisbois Bisgaard & Smith LLP 633 West 5 <sup>th</sup> Street, Suite 4000 Los Angeles, CA 90071	Tyler J. Bean of Siri & Glimstad LLP 745 Fifth Avenue, Suite 500 New York, NY 10151

For an objection to be considered by the Court, the objection must include all of the following:

**Questions? Go to [www.heartlanddatasettlement.com](http://www.heartlanddatasettlement.com) or call (833) 890-5635**



- i) the objector's full name, address, telephone number, and e-mail address (if any);
- ii) information identifying the objector as a Settlement Class Member, including proof that the objector is a member of the Settlement Class (e.g., copy of notice, copy of original notice of the Data Breach);
- iii) a written statement of all grounds for the objection, accompanied by any legal support for the objection the objector believes applicable;
- iv) the identity of any and all counsel representing the objector in connection with the objection;
- v) a statement as to whether the objector and/or his or her counsel will appear at the Final Approval Hearing;
- vi) the objector's signature and the signature of the objector's duly authorized attorney or other duly authorized representative (along with documentation setting forth such representation); and
- vii) a list, by case name, court, and docket number, of all other cases in which the objector and/or the objector's counsel has filed an objection to any proposed class action settlement within the last three years.

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

Objecting is telling the Court that you do not like the Settlement or parts of it and why you do not think it should be approved. You can object only if you are a Settlement Class Member. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class and do not want to receive any benefit from the Settlement.

### **THE LAWYERS REPRESENTING YOU**

#### **17. Do I have a lawyer in this case?**

Yes. The Court appointed Tyler J. Bean of Siri & Glimstad LLP, as Class Counsel to represent the Settlement Class in Settlement negotiations. If you want to be represented by your own lawyer, you may hire one at your own expense.

#### **18. How will the Class Counsel be paid?**

Class Counsel intends to request a combined award of attorneys' fees and costs not to exceed \$300,000. Any such award would compensate Class Counsel for investigating the facts, litigating the case, and negotiating the Settlement and will be the only payment to them for their efforts in achieving this Settlement and for their risk in undertaking this representation on a wholly contingent basis. Defendants shall pay any attorneys' fees, costs, and/or Service Awards separate and apart from any Settlement Class Member Benefits provided to Settlement Class Members and Settlement Administration Costs.

Class Counsel also intends to request Service Awards in the amount of \$2,500 to each Class Representative. These payments will not in any way reduce the consideration being made available to the Settlement Class.

Any attorneys' fees, costs and Service Award payments must be approved by the Court. The Court may award less than the amounts requested.

## THE COURT'S FINAL APPROVAL HEARING

### 19. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing on **November 19, 2025 at 9:00 a.m. CT**, at the Circuit Court of Lake County, Illinois, County Department, Chancery Division, as ordered by the Court. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are timely and valid objections, the Court will consider them and will listen to people who have asked to speak at the hearing if such a request has been properly made. The Court will also rule on the Application for Attorneys' Fees, Costs, and Service Awards payments. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take. The hearing may be moved to a different date or time without additional notice, so Class Counsel recommends checking the Settlement Website **[www.heartlanddatasettlement.com](http://www.heartlanddatasettlement.com)**, or calling **(833) 890-5635**.

### 20. Do I have to attend the hearing?

No. Class Counsel will represent the Settlement Class to the Court. You or your own lawyer are welcome to attend at your expense, but you are not required to do so. If you send an objection, you do not have to visit the Court to talk about it. As long as you filed your written objection on time with the Court and mailed it according to the instructions provided in **Question 15**, the Court will consider it.

### 21. 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 file an objection according to the instructions in **Question 15**, including all the information required. Your objection must be **mailed** to the Clerk of the Court, Class Counsel and Defendants' Counsel, at the mailing addresses listed above, **postmarked by no later than September 30, 2025**.

## IF YOU DO NOTHING

### 22. What happens if I do nothing?

If you do nothing, you will not receive any Settlement Class Member Benefits from this Settlement. If the Settlement is granted Final Approval and becomes Final, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendants or the other Related Entities based on any claim that could have been or that was brought relating to the Data Breach.

## ADDITIONAL INFORMATION

### 23. How do I get more information?

This Notice summarizes the Settlement. More details are in the Settlement Agreement itself. A copy of the Settlement Agreement is available at **[www.heartlanddatasettlement.com](http://www.heartlanddatasettlement.com)**. You may also call the Settlement Administrator with questions or to receive a Claim Form at **(833) 890-5635**.

**24. What if my contact information changes or I no longer live at my address?**

It is your responsibility to inform the Settlement Administrator of your updated information. You may do so at the address below, calling toll-free **(833) 890-5635** or at the Contact page of the Settlement Website:

Wittmeyer v. Heartland  
c/o Kroll Settlement Administration LLC  
P.O. Box 225391  
New York, NY 10150-5391

**PLEASE DO NOT CONTACT THE COURT, CLERK OF THE COURT OR CLASS  
COUNSEL FOR INFORMATION ABOUT THE CLASS ACTION SETTLEMENT**