

June 24, 2025



SETTLEMENT AGREEMENT

RE: Expansion Capital Group, LLC

Balance: \$169,006.00

Reference Number:

Dear I

This company is the servicing and collection agent for Expansion Capital Group, LLC ("ECG"). This letter will set out the terms by which our client will accept a settlement of your account.

Our client agrees that it will not pursue legal action on your account provided you pay as set forth in this letter. You agree to pay ECG the sum of \$117,955.00. This amount will be paid with an initial payment in the amount of \$20,000.00 on or before June 27, 2025. Thereafter, payments in the amount of \$6,850.00 are due on the 27th of every successive month until the settlement amount is paid in full. Cash, cashier's checks, and money orders are accepted forms of payment and must be mailed to AMA Recovery Group, LLC at 3131 Eastside St., Suite 350, Houston, TX 77098. You may also pay by wire or direct deposit into our Wells Fargo client trust account. Instructions to pay in this manner are enclosed.

Once all payments are made as described in the paragraph above, ECG will close your account as settled and cease all collection efforts. However, if payment is not received on or before the day it is due, the agreement and terms provided for in this letter will terminate without notice and the full balance under the original agreement will be due, less amounts received pursuant hereto.

continued on next page





Further, you agree that venue for any litigation arising out of this agreement and/or your underlying contract with ECG is in Harris County, Texas for all intents and purposes.

Regards,

By: Michael S. Kelleher, Esq.

Corporate Counsel

AGREED TO:

	7/7/2025	
Individually and as authorized agent for	Date	
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Encl.: Direct Deposit and Wiring Instructions