

Exhibit A

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
PADUCHAH DIVISION
CASE NO: 5:21-cv-00068-BJB-LLK**

**DANIEL MCNALLY,
Individually and on Behalf of all Others
Similarly Situated,**

PLAINTIFF

VS.

THE KINGDOM TRUST COMPANY

DEFENDANT

DECLARATION OF MARGERY CRAIG CONCERNING: (A) MAILING OF THE CLASS NOTICE AND CLAIM FORM; (B) PUBLICATION OF THE PRESS RELEASE; AND (C) REPORT ON REQUESTS FOR EXCLUSION AND OBJECTIONS

I, Margery Craig, declare as follows:

1. I am a Project Manager at Strategic Claims Services (“SCS”), a nationally recognized class action administration firm. I am over 21 years of age and am not a party to this Action.¹ I have personal knowledge of the facts set forth herein. I have over nineteen years of experience specializing in the administration of class action cases. SCS was established in April 1999 and has administered over five hundred and seventy-five (575) class action cases since its inception.

2. Pursuant to the Order (1) Preliminarily Certifying the Class for Settlement Purposes; (2) Granting Preliminary Approval of Settlement; and (3) Approving Class Notice, dated January 28, 2026 (the “Preliminary Approval Order”), SCS was approved as Claims Administrator and Settlement Administration Account Agent in connection with the Settlement of the above-captioned Action. I submit this declaration in order to provide the Court and the Settling Parties with information regarding the mailing of the Notice of Pendency of Class

¹ All capitalized terms used herein that are not otherwise defined have the meanings ascribed to them in the Settlement Agreement dated November 7, 2025 (the “Settlement Agreement”).

Action, Proposed Class Action Determination, Proposed Settlement of Class Action, Fairness Hearing and Right to Appear (“Class Notice”) and Proof of Claim Form and Release (“Claim Form,” and collectively with the Class Notice, the “Class Notice and Claim Form”) to potential Settlement Class Members, as well as updates concerning other aspects of the Settlement administration process. A copy of the Class Notice and Claim Form is attached as **Exhibit A**.

MAILING OF CLASS NOTICE AND CLAIM FORM

3. SCS received two investor contact lists that were obtained from Class Counsel on January 28, 2026, totaling 351 names and addresses. Pursuant to the Preliminary Approval Order, on February 11, 2026, SCS then mailed the Class Notice and Claim Form to those identified on the investor contact lists.

4. In total, 351 Class Notice and Claim Forms have been mailed to Settlement Class Members.

5. Of the 351 Class Notice and Claim Forms mailed, 42 were returned as undeliverable. Of these, the United States Postal Service provided a forwarding address for one, and SCS immediately mailed another Class Notice and Claim Form to the recipient at the forwarding address. The remaining 41 Class Notice and Claim Forms returned as undeliverable were “skip-traced” to obtain updated addresses, and 24 were re-mailed to updated addresses.

PUBLICATION OF THE PRESS RELEASE

6. SCS issued a Press Release that was published once in *GlobeNewswire* on March 2, 2026, to inform potential Settlement Class Members of the Settlement. A copy of the confirmation of publication is attached hereto as **Exhibit B**.

TOLL-FREE PHONE LINE

7. SCS maintains a toll-free telephone number (1-866-274-4004) for Settlement Class Members to call and obtain information about the Settlement. SCS has promptly responded to each telephone inquiry and will continue to address Settlement Class Member inquiries.

SETTLEMENT WEBPAGE

8. On February 11, 2026, SCS established a webpage for the Settlement on its website at www.strategicclaims.net/McNallyvKingdomTrust. The webpage is accessible 24 hours a day, 7 days a week. The webpage contains the current status; the case deadlines; an online claim filing system; and the important documents such as the Class Notice and Claim Form, the Preliminary Approval Order, and the Settlement Agreement.

REPORT ON EXCLUSIONS AND OBJECTIONS

9. The Class Notice, the Press Release, and the Settlement webpage informed potential Settlement Class Members that written requests for exclusion are to be mailed to SCS such that they are received no later than April 14, 2026. SCS has been monitoring all mail delivered for this case. As of the date of this declaration, SCS has received no exclusion requests.

10. According to the Class Notice, potential Settlement Class Members seeking to object to the Settlement or some part of it must submit their objections to the Court, either by mailing them to the Clerk of the Court or filing them in person at any location of the United States District Court for the Western District of Kentucky, and also email or mail their objections to Class Counsel, no later than April 14, 2026. As of the date of this declaration, SCS has not received any misdirected objections, and SCS has not been notified that an objection was filed.

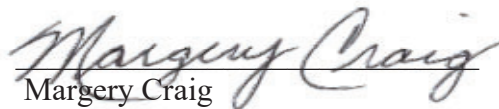
SETTLEMENT ADMINISTRATION ACCOUNT

11. Pursuant to the terms and conditions of the Settlement Agreement, SCS established the Settlement Administration Account at Huntington National Bank as a Qualified Settlement Fund on January 28, 2026.

12. On February 9, 2026, \$10,000 was deposited into the Settlement Administration Account by WAO Fintech LLC and the remaining \$990,000 was deposited into the Settlement Administration Account by the Kingdom Trust Company on February 25, 2026 per the terms of the Settlement Agreement.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 30th day of March 2026, in Media, Pennsylvania.


Margery Craig

NOTICE OF PENDENCY OF CLASS ACTION, PROPOSED CLASS ACTION DETERMINATION, PROPOSED SETTLEMENT OF CLASS ACTION, FAIRNESS HEARING AND RIGHT TO APPEAR

A Federal Court authorized this notice. This is not a solicitation from a lawyer.

McNally v. The Kingdom Trust Company
Case No. 5:21-cv-0068

United States District Court for the Western District of Kentucky

If you invested money in or through the William Jordan Fund Scheme (as defined below) and suffered a loss, then the proposed settlement of a class action lawsuit may affect your rights.

- This Notice explains what the class action is about, what the Settlement will be if it is approved by the United States District Court for the Western District of Kentucky, what benefits you may receive under the Settlement, and what to do if you want to (i) object to the Settlement; or (ii) not participate in the Settlement and instead “opt out” of the Class Action.¹ These rights and options—**and the deadlines to exercise them**—are explained in this notice.
- The Court still has to decide whether to approve the Settlement. The relief provided to Settlement Class Members will be provided if the Court approves the Settlement and after appeals, if any, are resolved in favor of the Settlement. Please be patient.
- **Your legal rights may be affected whether you act or do not act. Please read this Notice carefully because it explains decisions you must make and actions you must take now.**

Your Legal Rights And Options In This Settlement	
DO NOTHING	You will <u>not</u> receive the benefits conferred by the Settlement, but you will be bound by any orders or judgment relating to the Settlement approved by the Court.
SUBMIT A CLAIM FORM ONLINE OR POSTMARKED NO LATER THAN APRIL 14, 2026	The Claims Administrator will evaluate your claimed loss. If it is determined to be valid, you will receive benefits conferred by the Settlement. You will be bound by any orders or judgment relating to the Settlement approved by the Court.
EXCLUDE YOURSELF (OPT-OUT)	You will be not be entitled to benefits under the Settlement. This is the only choice that will allow you to sue The Kingdom Trust Company on your own regarding the claims discussed in this notice. An exclusion request must be in writing and received on or before April 14, 2026 .
OBJECT TO THE SETTLEMENT	You can write to the Court about why you do not agree with any aspect of the Settlement. An objection must be in writing, and filed or received on or before April 14, 2026 .

BASIC INFORMATION

1. Why did I get this notice and what is this lawsuit about?

A class action lawsuit, entitled *McNally v. The Kingdom Trust Company*, was brought in the United

¹ Unless otherwise stated, all capitalized terms used herein have the meanings defined in the Settlement Agreement.

States District Court for the Western District of Kentucky against Defendant, The Kingdom Trust Company (“Defendant” or “Kingdom Trust”), on behalf of persons and entities who invested in a purported Ponzi scheme (the “William Jordan Fund Scheme”) operated by William Jordan (“Jordan”), and who lost money thereby. According to the class action complaint (“Complaint”), Jordan, acting as an advisor and fiduciary for investors through his businesses William Jordan Investments, Inc. and WJA Asset Management, LLC, placed the investors’ money in several investment funds Jordan organized and controlled (the “WJA Funds”), ostensibly to profitably invest such money in real estate, private equity, and other securities. The investment funds at issue are described below in Who is in the Settlement? Unfortunately, investors in the William Jordan Fund Scheme lost money when the scheme ultimately collapsed.

The Complaint was brought against Defendant Kingdom Trust, as the WJA Funds’ custodian and trustee. It alleged that Kingdom Trust aided and abetted the William Jordan Fund Scheme by knowingly allowing the commingling of investor funds and facilitating improper transfers between funds, and that it committed its own fraud and violated the Kentucky Securities Act by sending statements containing fraudulent investment valuations to WJA Fund investors. Kingdom Trust denies the claims. For more detailed information on the allegations, you may review a copy of Plaintiffs’ Complaint at www.strategicclaims.net/McNallyvKingdomTrust.

The Parties have now settled this lawsuit (the “Settlement”), and a Claims Administrator has issued this Notice.

This Notice also informs you of the Court’s preliminary certification of a Class, as defined below, for purposes of the Settlement, and the effect of that certification decision.

The Court ordered this Notice because the proposed Settlement may apply to you, and you have a right to know about it and all your options before the Court decides whether to approve the Settlement.

2. Why is this a class action and who is involved?

In a class action, one or more people called “Class Representatives” sue on behalf of other people who have similar claims. All those people together are the “Class” or “Settlement Class Members.”

The Court preliminarily certified a Class consisting of: all persons or entities who invested money in or through the William Jordan Fund Scheme (as defined below), and suffered a loss.

The Court’s class certification decision means that Settlement Class Members who wish to receive the benefit of the Settlement must remain in the Class. However, those Settlement Class Members will also be bound by any judgement in this Action, including the Release (explained here). In other words, a Settlement Class Member who chooses to remain in the Class and accept the benefits of the Settlement will forgo the right to bring their own separate lawsuit against any of the Released parties with a lawyer of their choosing at their own expense. Settlement Class Members who do not want to remain in the Settlement Class need to exclude themselves (“opt-out”) from the Class as explained in Section 13 below.

At the Fairness Hearing, the Court will consider, among other things, whether the Class should be certified permanently.

3. Why is there a settlement?

The Court did not decide in either Plaintiffs’ or Kingdom Trust’s favor and will not do so if the proposed Settlement is approved. The Settlement will end all the claims against Kingdom Trust in the Action and avoid the uncertainties and costs of further litigation and any further trial.

Plaintiffs have agreed to a Settlement of this Action after considering, among other things: (1) the benefits to Plaintiffs and the proposed Settlement Class under the terms of the Settlement Agreement; (2) the risks,

costs, and uncertainty of continued, protracted litigation, as well as the difficulties and delays inherent in such litigation; (3) whether or not Plaintiffs would be able to collect on a judgement (i.e., Kingdom Trust's ability to pay) if Plaintiffs prevailed at trial; and (4) the desirability of consummating the Settlement Agreement promptly in order to provide effective relief to Plaintiffs and the proposed Class.

The proposed Settlement does not suggest that Kingdom Trust has or has not done anything wrong, or that Plaintiffs and the proposed Class would or would not win their case if it were to go to trial.

WHO IS IN THE SETTLEMENT

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

You are a Settlement Class Member if you, on behalf of yourself or an entity you own, invested in the William Jordan Fund Scheme and suffered a loss as a result of that investment.

The William Jordan Fund Scheme means the alleged Ponzi scheme perpetrated by William Jordan through the WJA Funds, as well as TD REO Fund, LLC. The WJA Funds include:

- 5827 Winland Hills Drive Development Fund, LLC
- Alabama Housing Fund, LLC
- CA Express Fund, LLC
- CA See Jane Go Fund, LLC
- CA Whirl Fund, LLC
- Equity Indexed Managed Fund, LLC
- PMB Managed Fund, LLC
- Prosper Managed Fund, LLC
- TD Opportunity Fund, LLC
- Urban Produce Fund, LLC
- Whirl Fund, LLC
- WJA Express Fund, LLC
- WJA Real Estate Opportunity Fund I, LLC
- WJA Real Estate Opportunity Fund, II, LLC
- WJA Secure Real Estate Fund, LLC
- WJA Secure Income Fund, LLC

If you are not sure whether you qualify as a Settlement Class Member, you can contact the Claims Administrator by email at info@strategicclaims.net, toll-free at (866) 274-4004, visit the website at www.strategicclaims.net/McNallyvKingdomTrust, or by mail at *McNally v. The Kingdom Trust Company*, c/o Strategic Claims Services, P.O. Box 230, 600 N. Jackson Street, Suite 205, Media, PA 19063.

WHAT YOU GET FROM THE SETTLEMENT

5. What does the Settlement provide?

The Settlement Agreement provides that Kingdom Trust will create a fund of \$1 million, called the "Settlement Fund," that will be used to pay:

- (a) payments to Settlement Class Members who submit timely, valid, and approved Claim Forms;
- (b) Claims administration costs, including, but not limited to, notice and administration costs and any escrow and banking fees ("Notice and Administrative Expenses");
- (c) payments to Class Representatives for any Service Awards as ordered by the Court; and

(d) payments to Class Counsel for attorney's fees and litigation costs as ordered by the Court ("Attorneys' Fees and Expense Award").

After deducting from the Settlement Fund any Court-approved payments to Class Representatives and Class Counsel for an Attorneys' Fees, Expenses, and Service Award, and the Notice and Administrative Expenses (the "Net Cash Settlement Amount"), Settlement Class Members will be paid from the Settlement Fund in an amount equal to the Settlement Class Member's proportionate share of the Net Cash Settlement Amount, relative to the total dollar amount on the Settlement Class Member's completed and validated Claim Form, up to the full dollar amount of the Settlement Class Member's validated Claim Form, as explained under § 6. The Plan of Allocation, below.

In return for the benefits in this Settlement, and if the Settlement is implemented, all Settlement Class Members will release Kingdom Trust from the claims discussed in the Settlement, and this Action will be dismissed with prejudice, among other terms.

6. The Plan of Allocation

At this time, it is not possible to determine how much any individual Settlement Class Member might receive from the Settlement.

Under the proposed Plan of Allocation, the Claims Administrator will first calculate each Settlement Class Member's Alleged Loss (the "Recognized Claim" or "Recognized Alleged Loss"). The Plan of Allocation seeks to distribute the Net Cash Settlement Amount fairly to those Settlement Class Members who filed timely, valid Claim Forms and suffered economic loss as a result of their investments in the William Jordan Scheme. Calculations made under the Plan of Allocation are not intended to be estimates of, or indicative of, the amounts that Settlement Class Members might have been able to recover after a trial. Nor are those calculations intended to be estimates of the amounts that will be paid to Authorized Claimants under the Settlement. Computations under the Plan of Allocation are only a method to weigh the claims of Claimants against one another for the purposes of making pro rata allocations of the Net Cash Settlement Amount. To the extent that there are sufficient funds in the Net Cash Settlement Amount, each Authorized Claimant will receive a payment equal to their Alleged Loss. If there are not sufficient funds in the Net Cash Settlement Amount to pay the total Alleged Losses of all Authorized Claimants, then each Authorized Claimant's payment will be their *pro rata* share, as defined below.

PROPOSED PLAN OF ALLOCATION

The Alleged Loss shall mean the principal amount each Authorized Claimant invested in the William Jordan Fund Scheme less any amounts received in return, including payments such as interest, redemptions, or any amounts received in the WJA Bankruptcy.

By way of example, if an Authorized Claimant invested \$100 in the William Jordan Fund Scheme, received \$20 in interest payments on their investment, and in addition, recovered \$10 through the WJA Bankruptcy, their Alleged Loss would be \$70 ($\$100 - \$20 - \$10 = \70).

The Claims Administrator will then calculate each Authorized Claimant's recovery under the Settlement by multiplying the Net Cash Settlement Amount by a fraction, (a) the numerator of which is the Authorized Claimant's Alleged Loss and (b) the denominator of which is the sum of each and every Authorized Claimant's Alleged Loss ("*pro rata* share").

The Plan of Allocation is not a part of the condition of approval of the Settlement. Under the Settlement Agreement, the Net Cash Settlement Amount may be distributed in accordance with the proposed Plan of Allocation or such other plan as the Court may approve.

Defendant is not entitled to get back any portion of the Settlement Fund once the Court's order or

judgment approving the Settlement becomes Final. Defendant shall not have any liability, obligation, or responsibility for the administration of the Settlement, the disbursement of the Net Cash Settlement Amount, or the Plan of Allocation.

The Net Cash Settlement Amount will not be distributed unless and until the Court has approved the Settlement and a plan of allocation, and the time for any petition for rehearing, appeal, or review, whether by certiorari or otherwise, has expired.

7. How can I get a cash payment?

You must submit a valid and timely Claim Form to receive a cash payment from the Net Cash Settlement Amount.

To submit a Claim, you must submit a Claim Form, and supporting documentation if needed, using either the attached Claim Form or using the online claims module at www.strategicclaims.net/McNallyvKingdomTrust.

If you do not complete and submit a completed Claim Form and Form W-9, as well as supporting documentation for the investments claimed on your Claim Form, you will not receive any payments under the Settlement.

A Claim Form with Form W-9 is attached to this Notice. You may also obtain a Claim Form and a Form W-9 by visiting www.strategicclaims.net/McNallyvKingdomTrust. Please read the instructions carefully, fill out the forms completely and accurately, and submit the forms and any documents, as applicable. Claim Forms and Form W-9s must be submitted online at www.strategicclaims.net/McNallyvKingdomTrust by 11:59 p.m. ET on April 14, 2026 or postmarked no later than April 14, 2026.

8. When would I receive my benefits?

Once the deadlines for opting out and objecting to the Settlement set forth below have passed, the Court will hold a Fairness Hearing on April 28, 2026 to decide whether to approve the Settlement.

The Court must finally approve the proposed Settlement before any payments can be made. The Court will grant its approval only if it finds that the proposed Settlement is fair, reasonable and adequate. In addition, the Court's order may be subject to appeals. It is always uncertain whether these appeals can be resolved, and resolving them takes time, sometimes more than a year. Finally, there remains a possibility that this Settlement may be terminated for other reasons. You may visit www.strategicclaims.net/McNallyvKingdomTrust for updates on the progress of the Settlement. Please be patient.

9. What am I giving up for these benefits?

In exchange for the benefits described in this Notice, and if the Court grants Final Approval of the Settlement, all Settlement Class Members who do not opt out of the Settlement are giving up (also called "releasing") their right to sue The Kingdom Trust Company and the other Releasees for claims related to the William Jordan Fund Scheme (the "Released Claims").

Released Claims means any and all Claims of or by the Settlement Class Members, as against the Releasees, that were asserted, could have been asserted, or could in the future be asserted, arising from, based on, or relating to allegations in the Class Action.

Released Claims do not include any claims you may have in the WJA Bankruptcy action.

If you remain in the Settlement Class, you will be enjoined and barred from initiating or continuing any lawsuit or other proceeding against The Kingdom Trust Company and the other Releasees if those claims are included among those released in the Settlement.

As part of this Settlement, the Court has preliminarily enjoined all Settlement Class Members and/or their representatives (who do not timely exclude themselves from the Class) from maintaining, commencing, prosecuting, or pursuing any Released Claim against The Kingdom Trust Company (or against any of their related parties or affiliates).

Upon final approval of the Settlement, Plaintiffs and The Kingdom Trust Company will ask the Court to make this injunction permanent (the “Complete Bar Order”). All Settlement Class Members will be bound by this permanent injunction.

The Settlement Agreement is available at www.strategicclaims.net/McNallyvKingdomTrust and provides more detail regarding the Release.

THE LAWYERS AND PLAINTIFFS REPRESENTING YOU

10. Do I have a lawyer in this case?

The Court has decided that the lawyers at Rosca Scarlato LLC and McCarthy Lebit Crystal & Liffman Co., LPA are qualified to represent you and all Settlement Class Members. These lawyers have been designated as Class Counsel for the Settlement based on a determination that they are capable and experienced in handling complex class actions.

You can contact Class Counsel at:

Alan L. Rosca ROSCA SCARLATO LLC 3401 Enterprise Parkway Suite 340-311 Beachwood, OH 44122 arosca@rscounsel.law	Paul J. Scarlato ROSCA SCARLATO LLC Four Tower Bridge, 200 Barr Harbor Drive Suite 400 W. Conshohocken, PA 19428 pscarlato@rscounsel.law	Hugh D. Berkson MCCARTHY LEBIT CRYSTAL & LIFFMAN 1111 Superior Avenue East Suite 2700 Cleveland, OH 44114 hdb@mccarthylebit.com
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11. How will the lawyers be paid?

Class Counsel will ask the Court to approve an Attorneys’ Fees and Expense Award, which is to be paid from the Settlement Fund. The Court may award less than the requested amount. Class Counsel expects to apply for an award of fees not to exceed 33 1/3% of the Settlement Fund and expenses not to exceed \$20,000. Class Counsel must file their request for attorneys’ fees and costs by March 30, 2026. A copy of Class Counsel’s request for attorneys’ fees and costs will be posted on the Settlement website once it has been filed.

12. Will the Class Representatives get anything?

Class Counsel will petition the Court for a Service Award, to be paid from the Settlement Fund, for each of the Class Representatives, Daniel McNally and Daniel Brager, in the amount of \$15,000 each. The purpose of such award, if any, shall be to compensate the Class Representatives for efforts undertaken by them on behalf of the Class. Class Counsel must file their request for a Service Award by March 30, 2026. A copy of Class Counsel’s request for a Service Award will be posted on the Settlement website once it has been filed.

EXCLUDING YOURSELF FROM THE SETTLEMENT

13. How do I opt out of the Settlement?

If you want to be able to sue The Kingdom Trust Company for the claims that are covered by the Release in this Settlement, you must exclude yourself from the Class. This process is also sometimes referred to as “opting out.”

To exclude yourself from the Settlement, you must submit a request to opt out to the Claims Administrator. The request to opt out must: (a) identify the case name, *McNally v. The Kingdom Trust Company*; (b) identify the name and address of the person requesting exclusion; (c) be personally signed by the person requesting exclusion; and (d) contain a statement that indicates a desire to be excluded from the Settlement Class, such as “I hereby request that I be excluded from the proposed Settlement Class in the Action.” Your request to opt out must be received no later than April 14, 2026, (the “Opt-Out Deadline”) and must be mailed to:

McNally v. The Kingdom Trust Company
c/o Strategic Claims Services
600 N. Jackson St., Ste. 205
P.O. Box 230
Media, PA 19063

If you ask to be excluded, you will **not** receive any Settlement benefits, and you **cannot** object to the Settlement.

However, if your request for exclusion is late or deficient, you will still be considered a part of the Settlement Class, you will be bound by the Settlement and by all other orders and judgments in this lawsuit, and you will not be able to participate in any other lawsuits based on the claims in this case.

OBJECTING TO THE SETTLEMENT

14. How do I tell the Court I do not like the Settlement?

If you remain in the Settlement Class, you can tell the Court you do not agree with the Settlement or some part of it.

You can ask the Court to deny approval by filing an objection. You cannot ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court denies approval, no Settlement payments will be sent out and the lawsuit will continue. If that is what you want to happen, you must object.

Any objection to the proposed Settlement must be in writing. If you file a timely written objection, you may, but are not required to, appear at the Fairness Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney.

All written objections and supporting papers must (a) clearly identify the case name and number (*McNally v. The Kingdom Trust Company*, Case Number 5:21-cv-00068), (b) be submitted to the Court either by mailing them to the Clerk of the Court, United States District Court, Western District of Kentucky, Clerk’s Office, 601 W. Broadway, Room 106, Gene Snyder United States Courthouse, Louisville, KY 40202 or by filing them in person at any location of the United States District Court for the Western District of Kentucky, and (c) be filed or received on or before April 14, 2026 (the “Objection Date”).

You must also **email or mail** the objection and any supporting papers **on or before April 14, 2026** to Class Counsel. If by email, to: arosca@rscounsel.law **and** hdb@mccarthylebit.com. If by mail to: Alan Rosca, ROSCA SCARLATO LLC, 3401 Enterprise Parkway, Suite 340-311, Beachwood, OH 44122,

and Hugh Berkson, McCARTHY LEBIT CRYSTAL & LIFFMAN CO., LPA, 1111 Superior Avenue, Suite 2700, Cleveland, OH 44114.

All written objections must include the name, address, telephone number of the Settlement Class Member objecting and, if represented by counsel, of his/her counsel; the basis for objection; and a statement of whether he/she intends to appear at the Fairness Hearing, either with or without counsel.

THE COURT'S FAIRNESS HEARING

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

The Court will hold a Fairness Hearing on April 28, 2026 at 2 p.m., which is subject to change, at the United States District Court for the Western District of Kentucky, Gene Snyder U.S. Courthouse, 601 W. Broadway, Room 106, Louisville, KY 40202, before the Honorable Benjamin Beaton, United States District Judge. At this hearing, the Court will consider whether to finally certify the Class, and whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court may also decide how much to pay Class Counsel and the Class Representatives pursuant to the Attorneys' Fees, Expenses, and Service Award Application, and for Notice and Administrative Expenses. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take. The Fairness Hearing may be postponed without further notice to the Class. If you plan to attend the hearing, you should check www.strategicclaims.net/McNallyvKingdomTrust or the Court's PACER site at <https://ecf.kywd.uscourts.gov>, to confirm that the date has not been changed.

16. Do I have to come to the hearing?

No. Class Counsel will represent you and will answer any questions Judge Beaton may have. But you are welcome to come at your own expense. If you send a comment (including an objection), you do not have to come to the Court to talk about it. As long as you submitted it on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

GETTING MORE INFORMATION

17. Are there more details about the Settlement?

This Notice summarizes the proposed Settlement. For the precise terms and conditions of the Settlement, please see the Settlement Agreement available at www.strategicclaims.net/McNallyvKingdomTrust.

You may also obtain this information by contacting the Claims Administrator toll-free at (866) 274-4004, Class Counsel at Rosca Scarlato LLC at (888) 998-0530, by accessing the Court docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.kywd.uscourts.gov>, or by visiting the Office of the Clerk for the United States District Court for the Western District of Kentucky at 601 W. Broadway, Room 106, Gene Snyder United States Courthouse, Louisville, KY 40202 during business hours.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
PADUCAH DIVISION
CASE NO: 5:21-cv-00068-BJB-LLK**

**DANIEL MCNALLY,
Individually and on Behalf of all Others
Similarly Situated,**

PLAINTIFF

VS.

THE KINGDOM TRUST COMPANY

DEFENDANT

PROOF OF CLAIM AND RELEASE

Deadline for Submission: April 14, 2026

IF YOU 1) INVESTED IN THE ALLEGED PONZI SCHEME (THE “WILLIAM JORDAN FUND SCHEME”) PERPETRATED BY WILLIAM JORDAN (“JORDAN”), THROUGH THE WJA FUNDS OR THE TD REO FUND, LLC AND 2) SUFFERED LOSSES, YOU MAY BE A SETTLEMENT CLASS MEMBER AND YOU MAY BE ENTITLED TO SHARE IN THE SETTLEMENT PROCEEDS.

“WJA FUNDS” MEANS THE PRIVATE INVESTMENT FUNDS FOUNDED BY WILLIAM JORDAN BETWEEN 2010 AND 2016, THROUGH WHICH JORDAN RAISED MONEY FROM HIS CLIENTS. THE WJA FUNDS INCLUDE:

- 5827 WINLAND HILLS DRIVE DEVELOPMENT FUND, LLC
- ALABAMA HOUSING FUND, LLC
- CA EXPRESS FUND, LLC
- CA SEE JANE GO FUND, LLC
- CA WHIRL FUND, LLC
- EQUITY INDEXED MANAGED FUND, LLC
- PMB MANAGED FUND, LLC
- PROSPER MANAGED FUND, LLC
- TD OPPORTUNITY FUND, LLC
- URBAN PRODUCE FUND, LLC
- WHIRL FUND, LLC
- WJA EXPRESS FUND, LLC
- WJA REAL ESTATE OPPORTUNITY FUND I, LLC
- WJA REAL ESTATE OPPORTUNITY FUND, II, LLC
- WJA SECURE REAL ESTATE FUND, LLC
- WJA SECURE INCOME FUND, LLC

TD REO FUND, LLC MEANS THE CALIFORNIA LIMITED LIABILITY COMPANY FORMED BY JORDAN AS A FORECLOSURE MANAGEMENT FUND TO MANAGE THE DEFAULTED TRUST DEEDS HELD IN JORDAN’S PRIVATE INVESTMENT FUNDS.

YOU MUST COMPLETE AND SUBMIT THIS PROOF OF CLAIM AND RELEASE FORM (“CLAIM FORM”) IN ORDER TO BE ELIGIBLE FOR ANY SETTLEMENT BENEFITS. YOU MUST EITHER COMPLETE AND SUBMIT THE ELECTRONIC VERSION OF THIS CLAIM FORM BY 11:59 P.M. ET ON APRIL 14, 2026 AT WWW.STRATEGICCLAIMS.NET/MCNALLYVKINGDOMTRUST **OR** COMPLETE AND SIGN THIS CLAIM FORM AND MAIL IT BY FIRST CLASS MAIL, POSTMARKED NO LATER THAN APRIL 14, 2026, TO THE CLAIMS ADMINISTRATOR AT THE FOLLOWING ADDRESS:

McNally v. The Kingdom Trust Company
c/o Strategic Claims Services
P.O. Box 230
600 N. Jackson Street, Suite 205
Media, PA 19063
Fax: (610) 565-7985
Email: info@strategicclaims.net

FAILURE TO SUBMIT YOUR CLAIM FORM BY APRIL 14, 2026 WILL SUBJECT YOUR CLAIM TO REJECTION AND MAY PRECLUDE RECEIPT OF ANY MONEY IN CONNECTION WITH THE SETTLEMENT OF THIS ACTION. DO NOT MAIL OR DELIVER YOUR CLAIM FORM TO THE COURT OR TO ANY OF THE PARTIES OR THEIR COUNSEL AS ANY SUCH CLAIM WILL BE DEEMED NOT TO HAVE BEEN SUBMITTED. SUBMIT YOUR CLAIM FORM ONLY TO THE CLAIMS ADMINISTRATOR.

CLAIMANT’S STATEMENT

1. I (we) invested money in or through the William Jordan Fund Scheme through the WJA Funds and/or TD REO Fund, LLC, and suffered losses. (Do not submit this Claim Form if you did not invest in the William Jordan Scheme described above).
2. By submitting this Claim Form, I (we) state that I (we) believe in good faith that I am (we are) a Settlement Class Member as defined above and in the Notice Of Pendency Of Class Action, Proposed Class Action Determination, Proposed Settlement Of Class Action, Fairness Hearing And Right To Appear (the “Notice”), or am (are) acting for such person(s); that I am (we are) not a Defendant in the Class Action or anyone excluded from the Settlement Class, as defined in the Notice; that I (we) have read and understand the Notice; that I (we) believe that I am (we are) entitled to receive a share of the Net Cash Settlement Amount, as defined in the Notice; that I (we) elect to participate in the proposed Settlement described in the Notice; and that I (we) have not filed a request for exclusion. (If you are acting in a representative capacity on behalf of a Settlement Class Member [e.g., as an executor, administrator, trustee, or other representative], you must submit evidence of your current authority to act on behalf of that Settlement Class Member. Such evidence would include, for example, letters testamentary, letters of administration, or a copy of the trust documents.)
3. I (we) consent to the jurisdiction of the Court with respect to all questions concerning the validity of this Claim Form. I (we) understand and agree that my (our) claim may be subject to investigation and discovery under the Federal Rules of Civil Procedure, provided that such investigation and discovery shall be limited to my (our) status as a Settlement Class Member(s) and the validity and amount of my (our) Claim. No discovery shall be allowed on the merits of the Action or Settlement in connection with processing of the Claim Form.

4. I (we) have set forth where requested below all relevant information with respect to each investment in the William Jordan Fund Scheme through the WJA Funds and/or TD REO Fund, LLC. I (we) agree to furnish additional information to the Claims Administrator to support this Claim Form if requested to do so.
5. I (we) have enclosed photocopies of the documents evidencing each investment in the William Jordan Fund Scheme through the WJA Funds and/or TD REO Fund, LLC in support of my (our) claim. (IF ANY SUCH DOCUMENTS ARE NOT IN YOUR POSSESSION, PLEASE OBTAIN A COPY OR EQUIVALENT DOCUMENTS BECAUSE THESE DOCUMENTS ARE NECESSARY TO VERIFY AND PROCESS YOUR CLAIM.)
6. I (we) understand that the information contained in this Claim Form is subject to such verification as the Claims Administrator may request or as the Court may direct, and I (we) agree to cooperate in any such verification. (The information requested herein is designed to provide the minimum amount of information necessary to process most simple claims. The Claims Administrator may request additional information as required to efficiently and reliably calculate your Recognized Claim. In some cases, the Claims Administrator may condition acceptance of the claim based upon the production of additional information)
7. Upon the occurrence of the Court's approval of the Settlement, as detailed in the Notice, I (we) agree and acknowledge that my (our) signature(s) hereto shall effect and constitute a full and complete release by me (us) and my (our) respective past or present parents, predecessors, successors, current and former affiliates, divisions, business units, joint ventures, subsidiaries, assigns, any entities in which I (we) have or had a controlling interest or that have or had a controlling interest in him, her, or it, and any other person or entity (including any governmental entity) claiming by or through, on behalf of, for the benefit of, derivatively for, or their respective past and present officers, directors, employees, officials, members, partners, and attorneys, ("Releasors"), of all Released Claims as defined in the Settlement Agreement and Notice.

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PART I: CLAIMANT INFORMATION

Beneficial Owner's Name (First, Middle, Last):		
Joint Beneficial Owner's Name (First, Middle, Last):		
Representative's Name (First, Middle, Last):		
Address:		
City:	State:	ZIP:
Foreign Province:	Foreign Country:	
Day Phone:	Evening Phone:	
Email:		
Social Security Number (for individuals):	OR	Taxpayer Identification Number (for estates, trusts, corporations, etc.):

Specify one of the following:

- IRA
- Joint Tenancy
- Employee
- Individual
- Other _____ (please explain)

PART II: SCHEDULE OF TRANSACTIONS IN THE WJA FUNDS AND/OR TD REO FUND, LLC

Investments:

A. Separately list each and every investment in the WJA Funds and/or TD REO Fund, LLC, and provide the following information (*must be documented*):

Name of Fund	Investment Amount	Do You Still Hold The Investment? (Y or N)	If You Do Not Still Hold The Investment, Describe What You Did With It

KINGDOM TRUST

Sales:

B. Separately list each and every sale or disposition in the WJA Funds and/or TD REO Fund, LLC, and provide the following information (*must be documented*):

Name of Fund	Date	Amount Received

Interest, Dividends or Other Return on Investment:

C. Separately list each and every payment you received from the WJA Funds and/or TD REO Fund that represents a payment for interest, dividends, or other return on investment (such as a redemption payment, return of principal, etc.), and provide the following information (*must be documented*):

Name of Fund	Date	Amount Received

Amounts Received From Bankruptcy Proceedings:

D. Separately list each and every payment you received from the bankruptcy proceedings filed by WJA Asset Management, LLC in the United States Bankruptcy Court for the Central District of California, under the master file Case No. 8:17-bk-11996, or any related bankruptcy proceeding filed by the WJA Funds, and any other entity related to William Jordan.

Date	Amount Received

If additional space is needed, attach separate, numbered sheets, giving all required information, substantially in the same format, and print your name and Social Security or Taxpayer Identification number at the top of each sheet.

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PART III: SUBSTITUTE FORM W-9

Request for Taxpayer Identification Number:

Enter taxpayer identification number below for the Beneficial Owner(s). For most individuals, this is your Social Security Number. The Internal Revenue Service (“I.R.S.”) requires such taxpayer identification number. If you fail to provide this information, your claim may be rejected.

Social Security Number (for individuals)	or	Taxpayer Identification Number (for estates, trusts, corporations, etc.)
_____		_____

YOU MUST READ AND SIGN THE CERTIFICATION BELOW. FAILURE TO SIGN THE CERTIFICATION MAY RESULT IN A DELAY IN PROCESSING OR REJECTION OF YOUR CLAIM

PART IV: CERTIFICATION

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the I.R.S. that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the I.R.S. has notified me (us) that I am (we are) no longer subject to backup withholding.

NOTE: If you have been notified by the I.R.S. that you are subject to backup withholding, please strike out the language that you are not subject to backup withholding in the certification above.

UNDER THE PENALTIES OF PERJURY UNDER THE LAWS OF THE UNITED STATES, I (WE) CERTIFY THAT ALL OF THE INFORMATION I (WE) PROVIDED ON THIS PROOF OF CLAIM AND RELEASE FORM IS TRUE, CORRECT AND COMPLETE.

Signature of Claimant (If this claim is being made on behalf of Joint Claimants, then each must sign):

(Signature)

(Signature)

(Capacity of person(s) signing, e.g., beneficial purchaser(s), executor, administrator, trustee, etc.)

Check here if proof of authority to file is enclosed.
(See Item 2 under Claimant’s Statement)

Date: _____

**ACCURATE CLAIMS PROCESSING TAKES A
SIGNIFICANT AMOUNT OF TIME.
THANK YOU FOR YOUR PATIENCE.**

Reminder Checklist:

1. Please sign and date the certification above. If this Claim Form is submitted on behalf of joint claimants, then both claimants must sign.
2. Remember to attach supporting documentation, if available.
3. DO NOT send originals of any supporting documentation; please only send copies. Supporting documentation submitted with your Claim Form will NOT be returned to you.
4. Keep a copy of everything you submit for your records, including your Claim Form.
5. If you desire an acknowledgment of receipt of your mailed Claim Form, please send it Certified Mail, Return Receipt Requested.
6. If you move or change your address, telephone number, or email address after submitting this Claim Form, please notify the Claims Administrator of the relevant changes. NOTE: Failure to submit updated information to the Claims Administrator may result in the Claims Administrator's inability to contact you regarding issues with your claim or deliver payment to you.

McNally v. The Kingdom Trust Company
c/o Strategic Claims Services
600 N. Jackson Street, Suite 205
Media, PA 19063

IMPORTANT LEGAL NOTICE – PLEASE FORWARD

Margery Craig

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Regards,

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Release Distribution Confirmation

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