

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

BRENDA NIXON, individually, and on behalf
of all others similarly situated,

Plaintiff,

v.

GRANDE COSMETICS, LLC,

Defendant.

Civil No. 1:22-cv-06639

**SECOND SUPPLEMENTAL
DECLARATION OF STEVEN
WEISBROT OF ANGEION GROUP, LLC
RE: CLAIM FORM SUBMISSIONS**

I, Steven Weisbrot, Esq., declare under penalty of perjury as follows:

1. I am the President and Chief Executive Officer at the class action notice and settlement administration firm Angeion Group, LLC (“Angeion”). I am fully familiar with the facts contained herein based upon my personal knowledge.
2. My credentials were provided to this Court in the previously filed Declaration of Steven Weisbrot, Esq. re: Angeion Group Qualifications and Proposed Notice Plan (“Notice Plan Declaration”) (Dkt. No. 25-5).
3. The purpose of this declaration is to provide the Parties and the Court with an update regarding the ongoing claims processing and fraud detection work performed subsequent to my declaration filed on March 7, 2024 (“Weisbrot Decl.”) (Dkt. No. 52-1).

Overview

4. Angeion previously reported that a total of 176,038 claims were preliminarily identified as facially valid, pending final audits and review, including a full assessment of each claim’s validity, a review for duplicative submissions, and a final fraud determination review. *Id.* at ¶ 7.
5. Since March 7, 2024, Angeion has worked with its strategic partner, ClaimScore, to continue the online claims review and verification process. The collaborative review was

performed under Angeion’s supervision and at its direction. As explained in greater detail below, this ongoing review has identified invalid online claims and additional indicia of fraud, resulting in the number of presumptively valid online claims being reduced from 176,038 to 109,402. An additional 11,981 hard copy claims have been received and are pending review (*i.e.*, have not yet been validated).

6. We have requested that counsel submit this declaration under seal, as the following information discusses our proprietary fraud detection efforts, which if disclosed to the public, undermines our ability to combat fraudulent claims.

Final Review Findings

7. As stated above, Angeion and ClaimScore’s combined efforts identified 66,636 additional claims that are invalid and/or have indicia of fraud. The additional invalid/fraudulent claims are a multi-factorial result, *i.e.*, no single metric explains all of the additional fraud or invalidity, which are described in greater detail below.

8. To aid in combating the ever-evolving technological sophistication in the manner and methods used to submit fraudulent claims, we [REDACTED]

[REDACTED]

9. [REDACTED]

¹ [REDACTED]

[REDACTED].

10. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

11. [REDACTED]
[REDACTED]

- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

- [REDACTED]
[REDACTED]
[REDACTED]

- [REDACTED]
[REDACTED]
[REDACTED]

- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

12. In addition to the combined fraud review efforts discussed above, we also further analyzed

the information provided on the claim form (and other claim filing details) to: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Fraud Review Conclusion

13. The combined fraud review efforts performed by Angeion and ClaimScore utilized state-of-the-art proprietary technology combined with time-intensive review to identify and confirm the sophisticated fraud techniques discussed herein. The identification of these additional fraudulent claims further safeguards and maintains the integrity of the Settlement Fund, ensuring that only bona fide and legitimate Class Members received benefits from this Settlement.

Estimated Award Amounts

14. As referenced in ¶ 5 above, as a result of the fraud review efforts, the total number of presumptively valid claims is 109,402, which includes the claims that are pending final manual review of submitted documentation. If all 109,402 claims are ultimately determined to be valid, the estimated amount that valid claimants will receive is approximately \$29.81 per valid claim, which represents an approximate increase of \$12.55 per valid claim.³

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

Dated: April 3, 2024


STEVEN WEISBROT

² [REDACTED]

³ The estimated amount is subject to change pending the review results of the 11,981 additional hard copy claims referenced in paragraph 5 herein.